



Written Testimony
Submitted to the Committee on Agriculture, Nutrition and Forestry
United States Senate

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Dear Chairman Roberts, Ranking Member Stabenow, and distinguished members of the Senate Committee on Agriculture, Nutrition and Forestry,

Thank you for hosting a 2018 Farm Bill Field Hearing in Michigan and for the opportunity to provide written comments.

We are a network of over 30 pediatricians, researchers, and non-partisan policy experts who have committed our professions to working alongside families that are food insecure to understand the issues and challenges they face, the potential they have, and the conditions necessary for their success.

Our Michigan colleague, Dr. Katherine Alaimo, Associate Professor, College of Agriculture and Natural Resources, Michigan State University, joins us in writing these comments. Through her nutrition research program, she works side-by-side with Michigan urban agriculture organizations, community gardeners, and school nutrition advocates, and has had the privilege to teach over 10,000 Michigan undergraduate students in her classrooms.

Children's HealthWatch is a nonpartisan research and policy endeavor focuses on economic hardship and child health that has been on the front lines of pediatric care for over 19 years. We identify ways to improve children's health in America by informing policies that address and alleviate economic hardships. Our work consists of epidemiological research where we interview the caregivers of young children in emergency departments and primary care clinics in Baltimore, Boston, Minneapolis, Littler Rock, and Philadelphia. Since 1998, we have interviewed over 80,000 caregivers and analyzed those interviews to determine the impact of public policies on the health and development of America's youngest children.

Since 2005, **The Center for Hunger-Free Communities** has sought solutions to poverty based on science and the human experience through carrying out research alongside low income families participating in SNAP and other assistance programs. With a two generation focus, we focus on childhood adversity and economic hardship, and seek to intervene through trauma-informed social services, empirical research, and evidence based policy making to unlock family potential and improve our public assistance programs.

These comments are in two parts concerning: 1) the Supplemental Nutrition Assistance Program (SNAP), and 2) Urban Agriculture and Community Gardening.

1. Supplemental Nutrition Assistance Program (SNAP)

As a group focused on health, we recognize that the Supplemental Nutrition Assistance Program (SNAP) is an important medicine, like a vaccine. Vaccines prevent illness in the immediate and long term and they protect the community as a whole. Decades of research, including our own, demonstrates that SNAP is an effective tool for reducing food insecurity and hunger and improving health across the lifespan, beginning during pregnancy and early childhood. ¹⁻³

Adequate prenatal nutrition is critical to the development of children's bodies and brains, and sets their course for life. Children born to mothers who experience even moderate levels of food insecurity during pregnancy are more likely to be born prematurely, have fetal growth retardation, and may be predisposed to chronic diseases.⁴⁻⁶

The first few years of a child's life are marked by the most rapid brain and body growth of a child's entire lifetime – including dramatic changes in cognitive, linguistic, social, and emotional development and in self-regulation, setting the stage for school readiness and adult wellbeing and success. ⁷ Our research shows that, just as during the prenatal period, young children in food-insecure families are more likely to be in poor health, to be hospitalized, and less likely to meet developmental milestones. ^{8,9} Food insecurity is also a serious risk factor for long-term poor health among older children, including higher odds of chronic conditions, asthma, and worse mental health, including aggression and thoughts and attempts of suicide. ^{10,11} The association between food insecurity and poor mental health results from an inherent biological response to food deprivation. Clearly, food insecurity is extremely serious – when America's teenagers in food insecure homes are contemplating or trying to commit suicide, we must take notice and be attentive to their needs.

Serious health consequences are also prevalent among adults. For instance, food insecurity and inadequate SNAP benefit amounts at the end of the month are both related to diabetic complications requiring medical treatment and hospitalization. ^{12,13}

Even college students are not immune to the damage of food insecurity. In Dr. Alaimo's Michigan State University Introduction to Human Nutrition course, 15% of students report food insecurity. A national study of 33,000 students at 70 community colleges in 24 states found that two-thirds of community college students are food insecure. College students who are hungry cannot focus in class. Food insecurity among college students in associated with not being able to afford textbooks, missing class, and dropping classes. Most college students are not eligible for SNAP.

Because of the life-long consequences of food insecurity from the time before one is born through adulthood, the American health care system is severely and unnecessarily burdened.

Our research shows that in the United States the health-related costs of food insecurity, including hospitalizations, ambulatory visits, and dental procedures, were \$160 billion in 2014 alone. This is unsustainable and unnecessary. Food insecurity can and should be prevented.

SNAP is our nation's first line of defense in addressing food insecurity. SNAP reduces food insecurity across the board . A recent USDA study found that participating in SNAP for 6 months was associated with a decrease in food insecurity by about 5 to 10 percentage points. SNAP also is an important part of our public health infrastructure. Our research shows this over and again.

Participating in SNAP is associated with:

- children being in good health and less likely to be at risk for developmental delays in early childhood,
- increased consumption of vitamin B, iron, and calcium,
- reduced risk of anemia,
- better academic performance and socioemotional skills among school-age children, and
- fewer reports of child abuse and neglect.

SNAP has long-lasting effects. A longitudinal research study found that those who participated in SNAP in early childhood had a lower risk of adult metabolic syndrome and thus also lower risk of diabetes and cardiovascular disease in adulthood.³ Not only is SNAP associated with better heath across the lifespan, but it promotes success in our workforce. Early participation in SNAP increased the likelihood that women would be economically self-sufficient in adulthood.³ This not only promotes health and wellbeing of our populace, but American economic prosperity. It helps working families, ¹⁸ and it holds up our small rural communities through job creation and economic stimulus.¹⁹

But like a vaccine, it is essential to apply SNAP in the proper dosage and for the necessary length of time in order for it to have the maximal impact on children and families, ensuring their long-term success. The Institute of Medicine found that the SNAP benefit is inadequate to purchase a healthy diet and recommended revisiting the base calculation. Our research shows the dose matters on a very grand scale. Compared to families participating in SNAP when the American Recovery and Reinvestment Act (ARRA) benefit increase was in place, families with young children experienced higher rates of household and child food insecurity when the amount of the SNAP benefit was reduced for all participants in November 2013.

RECOMMENDATIONS

As Congress prepares to reauthorize the Farm Bill, Dr. Alaimo, Children's HealthWatch, and the Center for Hunger-Free Communities recommend the following protections and improvements to SNAP policy based on our research among families with young children. Many of these

recommendations also mirror the recommendations made by the National Commission on Hunger, a bi-partisan commission the submitted their unanimous recommendations to Congress and the USDA in January 2016.²²

SNAP Structure

Congress must protect the existing structure of SNAP. SNAP is a fundamental component of America's public health and economic infrastructure. The structure of SNAP is built to respond when disasters strike or need increases. Any structural changes to the program would harm the people it serves, including low-income families, children, senior citizens, and people with disabilities. Any changes to the structure that will mean cuts to benefits will also result in economic slumps to local communities and working families.

SNAP Calculation

- 1. Raise SNAP Benefits to Match True Cost of a Healthy Diet: Congress should increase the amount of the monthly SNAP benefit by basing it on the calculation for the Low Cost Food Plan. According to the Institute of Medicine, the current SNAP allotment fails to reflect the real cost of a healthy diet. Key to achieving a benefit adequate to purchase healthy food is creating an updated and realistic market basket of foods by setting benefit amounts based on the cost of the USDA Dietary Guidelines for Americans. The current market basket has not been updated for over 10 years. Switching to the Low Cost Food Plan to determine the maximum SNAP benefit would raise the financial value of the benefit, putting a healthy diet within reach for families who receive SNAP.
- 2. Remove the Limit on or Regionally Adjusting Shelter Costs: Congress should improve the calculation of shelter costs. The current SNAP calculation limits the deduction families can take for their shelter costs leading to an inaccurate accounting of the support families need. By rethinking and potentially removing the cap on shelter costs the SNAP calculation would provide a more accurate accounting of families' real expenses, especially in areas with high housing costs.
- 3. Improve Transitional Benefits to Promote Work: Congress should create a more graduated and coordinated decline in benefits across programs. SNAP has a logical phase-down of benefits as income increases. Still, there is evidence that when people abruptly lose all SNAP benefits at the top end of income eligibility, they do not have enough time to adapt to new income realities and may experience food insecurity and worse health despite higher wages. When households leave SNAP for employment that pays sufficiently to end their program eligibility, Congress should allow states to offer an appropriate extension of their SNAP benefits that ensures they do not experience a net

decrease in resources. This transition period would help them navigate pay lags and adjust household food budgeting.

4. Eliminate Asset Tests and Raising the Floor for Income Eligibility: Congress should increase eligibility limits and remove asset tests. More than 80% of families with children who receive SNAP include adults who worked in the year prior to or after receiving SNAP. However, many low-income families still struggle to provide enough food for their families even when employed because, in some states, employment puts them over the income limit for SNAP. SNAP calculations should encourage progress toward economic independence, such as savings for emergencies, by removing limits on savings (known as asset tests).

SNAP and People with Disabilities

Congress should allow families of children with special health care needs (SHCN) to qualify for the medical deduction even if they do not meet the strict disability criteria for SSI. SHCN are conditions that require extra care or prescriptions beyond what is normally expected for a child of that age, including conditions that substantially increase family costs like asthma, food allergies, and epilepsy. Households participating in SNAP that have a family member receiving federal or state disability benefits are able to deduct the monthly cost of medical expenses over \$35 from their net income determining SNAP benefit amount. Allowing families of children with SHCN whose health care needs are above average but do not rise to the level of disability benefit eligibility to qualify for the medical deduction would increase the monthly benefit, which would help to offset some of the additional costs faced by families raising a child with SHCN.

SNAP and Veterans

Congress should enact legislation to exclude the Basic Allowance for Housing as income for the determination of SNAP eligibility and benefit levels for families who have an active duty service member. For active military families living off base or in privatized on-base housing, the Basic Allowance for Housing is counted as income in the determination of eligibility for SNAP and may prevent or reduce eligibility for SNAP. This is inconsistent with the way the Basic Allowance for Housing is treated in other government programs. The Basic Allowance for Housing is currently excluded as income for calculating income taxes and eligibility for other programs, including WIC.

SNAP and College Students

Congress should count class credit hours toward work eligibility requirements for greater than half-time college students applying for SNAP, and encourage states to increase outreach for college students. Completing college provides a strong path toward financial self-sufficiency for U.S. youth, and we should be doing all we can to reduce barriers to enrollment. Given the enormous burden of college tuition, students should not have to make the choice between paying for college expenses and food.

SNAP Program and Workforce

Congress should mandate customer service and trauma-informed staff training and infrastructure improvements to improve SNAP application and recertification processes. Although access to participation in SNAP has improved, the relationship between front-line caseworkers and applicants could be more positive and effective. Front-line caseworkers are often a client's first encounter with a system meant to help them; therefore, they have the best opportunity to provide effective and appropriate assistance.

SNAP Recipients are Experts

Congress must learn from current SNAP recipients for SNAP to be optimally effective and efficient. Just as a good business seeks the input and feedback of its customers as a matter of course, as a matter of good business and excellent customer service, SNAP recipients must be considered an important architect of the program. In order to make effective changes in the program, members of Congress and their staff need to meet with and invite testimony from people who participate in SNA, and the USDA should seek regular and meaningful input from those who have participated in their nutrition programs. Participants can provide accurate descriptions of what changes to the program would mean for them and their families in their everyday life.

2. Urban Agriculture and Community Gardening

Eating fruits and vegetables provides important nutrients and phytochemicals that reduce the risk of chronic diseases such as heart disease, cancer and diabetes. However, there are many distressed communities around the U.S. where low-income residents face multiple challenges acquiring fresh fruits and vegetables such as unemployment, underemployment, and lack of affordable food stores that sell fresh food.

Urban agriculture and community gardening can address and alleviate many of the challenges of marginalized urban areas by capitalizing on the assets that are available, such as vacant land and creativity. For example, Detroit, MI has been conservatively estimated to be 11% vacant

parcels (7.6 square miles), with tremendous potential for food production and job and income generation. One study found that 4,700 jobs & \$20 million increase in tax base could be created annually through a 20% shift to purchasing locally-produced food in Detroit.²³ Another found that up to 76% of vegetables and 41% of fruit currently consumed could be produced if biointensive, storage and season extension techniques were used on the vacant land currently available in Detroit.²⁴ Gardening does not need to be limited to vacant plots. One study estimated that 8%, over 7600 acres, of Philadelphia's residential neighborhoods are bare soil or grass that could be used for gardening.²⁵

Gardens have a high rate of return. Dr. Alaimo conducted a study with the Detroit Garden Resource Program Collaborative, a program of Keep Growing Detroit's network of over 1400 home, school and community gardens, and found that gardeners who weighed the produce they grew produced on average 241 pounds of produce per family worth approximately \$920. Potential revenues for small-scale farms have been estimated to be up to \$78,000 gross sales per quarter acre using permaculture techniques. Last year, growers in the Grown in Detroit program, another program of Keep Growing Detroit, earned \$80,000 through their sales at farmers' markets and other retail and wholesale outlets.

The use of urban agriculture and community gardens as a food security program builds upon one of America's most popular activities. More than a third of US households participate in food gardening. Community garden participation has also seen a dramatic increase recently; from 2008 to 2013, the number of US households participating in a community garden tripled, from one million to three million.²⁸

Dr. Alaimo and other researchers' studies have demonstrated health, social and economic benefits of urban community gardens. In addition to eating fruits and vegetables at more times per day, gardeners are more likely to know and trust neighbors, feel more connected to their neighborhood, be involved in their community, have social support, get to know the police who work in their neighborhood, and spend time with neighborhood children .²⁹⁻³⁵ Community gardens have also been shown to have positive effects on surrounding property values.³⁶ For all these reasons, urban agriculture and community gardens should be encouraged and propagated.

RECOMMENDATIONS

Urban Agriculture Act of 2016

Congress should include text of the Urban Agriculture Act of 2016 in the 2018 Farm Bill. Senator Stabenow has done an excellent job listening to urban constituents' concerns and ideas regarding urban agriculture and we praise her drafting of the Urban Agriculture Act of 2016. We recommend including expanded opportunities for urban farmers to create farm

cooperatives and obtain USDA farm loans and risk management tools, increased education and mentoring for new farmers, funding for research to improve urban agriculture yields while at the same time lowering resource consumption, and technical and financial support for soil remediation. In addition, technical support, outreach and grants should be provided to community organizations that wish to develop community gardens and urban farms especially those that provide fresh food for low-income populations such as families eligible for the SNAP program.

Practitioners are Experts

Parallel to our recommendation for the SNAP program, Congress must learn from current urban agriculture and community gardening practitioners, and urban fresh food program recipients to be optimally effective and efficient. Members of Congress and their staff need to meet with and invite testimony from people who participate in urban agriculture, and the USDA should seek regular and meaningful input from those who have participated in their urban agriculture programs. Likewise, research programs directed at urban agriculture should require partnership with on-the-ground organizations and farm operations.

Thank you and please stay in touch.

In closing, we hope that you consider the evidence and the recommendations made here-in and reach out to any of us among our Network. We have many experts on hand that can speak to every one of these points we make above. We are grateful for your considerations, and look forward to an excellent Farm Bill process that relies of scientific evidence and thoughtful policy responses based on these facts.

Sincerely,

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