

July 15th, 2021

Office of the Secretary
United States Department of Agriculture

Re: Identifying Barriers in USDA Programs and Services; Advancing Racial Justice and Equity and Support for Underserved Communities at USDA

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To Whom It May Concern:

Thank you for the opportunity to inform the United States Department of Agriculture's (USDA) assessment and plan to advance racial justice and equity at USDA. Please accept these comments on behalf of Children's HealthWatch, a nonpartisan network of pediatricians, public health researchers, and children's health and policy experts committed to improving children's health in America.

[Children's HealthWatch](#) seeks to improve the health and development of young children and their families by informing equitable policies that address and alleviate economic hardships and dismantling systems of institutionalized discrimination and inequity at the root of these hardships. Our work begins with research interviewing caregivers of young children on the frontlines of pediatric care, in urban emergency departments and primary care clinics in five cities: Boston, Minneapolis, Little Rock, Baltimore, and Philadelphia. Since 1998, we have interviewed over 75,000 caregivers of children under four years of age and analyzed those interviews to determine the impact of public policies on the health and development of young children. Based on our extensive research, we understand the harmful health consequences of financial instability, as well as the critical role of federal assistance programs and policies in stabilizing families, improving health, and promoting racial health equity.

In the following comments, Children's HealthWatch responds to questions 4, 5, 6, 7, 8, 9, 10, 12, and 14 under the General Questions section of USDA's notice.

Children's HealthWatch looks forward to promoting equity and improving the health and well-being of children and their families in partnership with the USDA. For questions regarding these comments, please contact Children's HealthWatch: Allison Bovell-Ammon, allison.bovell-ammon@bmc.org, or Charlotte Bruce, charlotte.bruce@bmc.org.

Sincerely,



Stephanie Ettinger de Cuba, PhD, MPH
Executive Director, Children's HealthWatch
Boston, MA



Megan Sandel MD, MPH
Co-Lead Principal Investigator, Children's HealthWatch
Boston, MA



Diana Becker Cutts, MD
Co-Lead Principal Investigator, Children's HealthWatch
Minneapolis, MN



Félice Lê-Scherban, PhD, MPH
Principal Investigator, Children's HealthWatch
Philadelphia, PA



Deborah A. Frank, MD
Principal Investigator and Founder, Children's HealthWatch
Boston, MA



John Cook, PhD, MAEd
Principal Investigator, Children's HealthWatch
Boston, MA



Eduardo Ochoa Jr., MD
Principal Investigator, Children's HealthWatch
Little Rock, AR

Are there USDA policies, practices, or programs that perpetuate systemic barriers to opportunities and benefits for people of color or other underserved groups? How can those programs be modified, expanded, or made less complicated or streamlined, to deliver resources and benefits more equitably?

Several interrelated barriers exist within both the design and implementation of federal nutrition programs that hinder participation and perpetuate inequities among Black, Indigenous, people of color (BIPOC), immigrants, families in rural areas, and other underserved communities. Barriers to participation include language inaccessibility (written and verbal, and inadequate translation or multi-lingual services), technology needs, burdensome application and recertification requirements (e.g. in-person visits and limited location/hours, long wait times on helplines, and frequent recertification periods), and repetitive applications across benefit programs. Combined with programmatic deficiencies including inadequate benefit calculations and complicated and often discriminatory program eligibility and requirements, federal nutrition assistance programs currently fall short of opportunities to further racial health equity. Furthermore, families who work in jobs overrepresented by women, immigrants, and people of color often earn low wages and have incomes that fluctuate based on seasonal earnings and irregular hours.¹ Fluctuations in income not only make it difficult to plan a family budget but can also make it challenging for families to stay connected to nutrition assistance because the family may appear to be over income one month and yet qualify the next. Unpredictable income can also result in reduced or lost benefits when families must report temporary earnings. These burdens and barriers result from inefficient and inequitable program design. In addition to those embedded in the design of programs, several barriers exist that deter participation in critical benefit programs. For example, experiencing discrimination while trying to access a program. These barriers prevent continuous access to evidence-based support, particularly for BIPOC, rural, and immigrant families; for many programs – including entitlement programs, such as the Supplemental Nutrition and Assistance Program (SNAP) – and as a result the programs do not reach all eligible families.

The above barriers must be addressed to enable families to access programs that support financial stability and promote health across all states and race/ethnicities. Strengthening racial and geographic equity in the design, implementation, and evaluation of SNAP, the Special Nutrition Program for Women, Infants, and Children (WIC), and other child nutrition programs is essential to move toward eliminating inequities and closing persistent disparities in food insecurity and other hardship rates. To achieve this and to deliver resources more equitably, we recommend that USDA implement the following changes and improvements:

- Accommodate the needs working parents and those with time and transportation constraints by extending agency/program office hours, creating alternate locations, and allowing online and phone certifications and training and required educational programs
- Track peak times of in-person, online or telephonic contact and adjust staffing accordingly to decrease wait times for assistance.
- Improve outreach and awareness to ensure that all families receive the benefits for which they are eligible.
 - o Engage in a proactive outreach and public education campaign among immigrants and their families to combat the chilling effect of the 2019 Public Charge Rule.
- Increase availability of interpreter services and provide multi-lingual resources.
- Encourage state agencies to hire local office staff who reflect the racial/ethnic background of the community they serve and/or have participated in government assistance programs such as SNAP and WIC.

- Require trauma-informed, anti-racist, and implicit bias training among staff and build in accountability.
- Encourage state agencies to maintain or transition offices to include co-located and integrated services (e.g. SNAP and WIC offices co-located in health care and child care settings).
- Encourage states to adopt or expand policies and state options that increase access to federal nutrition programs, including:
 - o Adopt or expand Broad Based Categorical Eligibility to reduce cliff effects when family income increases.
 - o Offer transitional benefits for families phasing out of program income eligibility to reduce cliff effects.
 - o Issue benefits remotely onto EBT cards, do not require WIC clients to physically present their EBT cards to receive benefits.
 - o Simplify reporting requirements.
 - o Allow all people eligible for SNAP under Federal requirements to participate in the program, such as formerly incarcerated individuals and those with certain criminal records.
- Improve WIC packages to promote flexibility and allow culturally sensitive food options.
- Strengthen breastfeeding support for WIC recipients of color.

In addition to implementing strategies to remove barriers, USDA should work with Congress to improve federal nutrition assistance programs and promote equity through the following provisions:

- Expand eligibility limits and remove asset limits for federal nutrition programs.
 - o Extend WIC to age 6 (instead of current age 5) to cover children falling into the gap of neither being age-eligible for school and therefore school meals nor eligible for WIC.
 - o Increase WIC certification timeframe for both breastfeeding and non-breastfeeding women to two years postpartum.
 - o Remove limits on savings (i.e. asset tests) and account for temporary income increases (e.g. holiday overtime or seasonal work) and income fluctuations by calculating income over a longer period of time.
 - o Eliminate time limits for unemployed and underemployed adults.
 - o Eliminate the five-year waiting period for lawfully present immigrants.
 - o Expand eligibility through Broad-Based Categorical Eligibility and higher gross income limits.
 - o Eliminate eligibility bans for formerly incarcerated individuals and those with certain criminal records.
- Improve benefit calculations to accurately reflect the real cost of basic needs.
 - o Adopt the Low Cost Food Plan as the basis for calculating SNAP benefits.
 - o Expand the medical deduction to include all family members with health care expenses.
 - o Improve the SNAP benefit calculation to accurately reflect the real cost of housing.
- Increase funding and opportunities for states to implement programs that supplement nutrition program benefits and enable families to access to affordable, healthy, and local produce
- Extend certification periods for all federal nutrition programs.
- Create a more gradual decline in benefits across nutrition assistance programs that avoid an abrupt reduction or loss of benefits and provide a smooth off-ramp for families in the workforce.

To further inform the assessment of and strategy to eliminate systemic barriers in nutrition programs, we strongly recommend that USDA review the Bread for the World report, *Applying Racial Equity to US Federal Nutrition Assistance Programs: SNAP, WIC, and Child Nutrition*.²

Children’s HealthWatch also adamantly recommends that in the process of identifying such barriers and solutions that USDA continually include the perspectives of those with lived expertise and BIPOC and immigrant communities that have been historically and systemically shut out of policy debates. To improve program implementation and coordination, it is essential that people with low incomes that have experience accessing (or attempting to access) assistance programs are placed at the center of these discussions. Furthermore, those who have experienced barriers and those with experience achieving economic mobility through assistance programs should influence and lead these efforts. This will achieve stronger services and better outcomes for all people and is critical for enacting policies and procedures that respond to the realities of families with low incomes. Additional details on strategies to engage people on the ground are outlined in the report mentioned above and described below.

How can USDA establish and maintain connections to a wider and more diverse set of stakeholders representing underserved communities?

For strategies to identify systemic inequities, advance equity, and build connections that engage and center experts with lived experience, we recommend USDA employ the Racial Equity Methodology.³ This methodology, developed by Marlysa Gamblin of GamblinConsults (formerly at Bread for the World Institute), includes five stages used to apply a racial equity lens, followed by key questions to consider at each stage to shape the process of gathering and evaluating information. This methodology particularly focuses on understanding the history and disparate impact of a policy/program, and methods to engage experts of color and with lived experience in design and evaluation. In the report, Gamblin highlights the importance of equitable community engagement, and makes particular and critical distinction of the ways in which experts and communities of color with lived experience are involved and credited. In the report, she states:

“Equitable engagement is different from participation. When experts of color are asked for feedback after a project has been designed, but before it is finalized (or, in some cases, even after it is finalized), they are participating. Experts of color do not hold real power in making decisions—for example, about framing how concepts are communicated. Often, there is no requirement or expectation that the project will include the feedback that participating experts of color have given in the final product. Equitable engagement involves experts of color from the beginning and empowers them to drive the conversation at each stage: design/planning, implementation/ execution, and evaluation. Experts of color also have real decision-making power in shaping the narrative, determining who should be at the table, etc. Equitable engagement also gives them appropriate credit for their ideas and work and compensates them for their time.”³

USDA must prioritize equitable engagement of BIPOC, immigrant, and families with low incomes from the beginning and at each stage of design/planning, implementation, and evaluation. Equitable engagement enables real decision-making power in shaping the narrative and determining who should be at the table, compensates people for their time, and gives credit to those involved. Entities of color that directly serve their communities, and other experts of color with lived and/or scholarly expertise, should be assigned to co-lead this process.

Additionally, in research and data collection conducted by USDA, it is critical to build racially and ethnically diverse research teams and examine assumptions, research questions, methodologies, and analytic interpretations and conclusions through an antiracist and equity lens. Furthermore, the composition of research teams must be critically examined in order to actively deconstruct harmful practices within conventionally designed research projects and evaluations.⁴

Please describe USDA programs or interactions that have worked well for underserved communities. What successful approaches to advancing justice and equity have been undertaken by USDA that you recommend be used as a model for other programs or areas?

Supported by a grant from USDA, in combination with state budget allocation, the Healthy Incentives Program (HIP) administered in Massachusetts provides a monthly supplement to families that participate in SNAP to purchase fruits and vegetables from Massachusetts farmers at farmers markets, farm stands, CSAs, and mobile markets.⁵ When families use their EBT card at these retailers, HIP reimburses up to a certain amount (based on household size) immediately back to the card. This program enables families to better afford local, healthy food, while simultaneously supporting farmers – many of whom are of color – and filling geographic gaps in availability of nutritious food options.⁶ For example, mobile markets are placed in areas with limited access to grocers and local produce, often communities of color. USDA’s evaluation of HIP found that people who participated had a higher intake of fruits and vegetables compared to those who did not participate.⁷ USDA can build on this and similar state programs to increase equitable access to healthy food options.

Does USDA currently collect information, use forms, or require documentation that impede access to USDA programs or are not effective to achieve program objectives? If so, what are they and how can USDA revise them to reduce confusion or frustration, and increase equity in access to USDA programs?

Numerous application and recertification hurdles (e.g. in-person visits and limited location/hours, inadequate online and telephonic assistance, frequency of recertification, repetitive applications across benefit programs) limit program accessibility and often result in program drop-off or churn. Multiple application and certification options (i.e. phone, online, and in-person) are necessary to ensure that people are able to access programs regardless of the barriers they face. People with limited access to internet may experience challenges accessing programs or complying with online requirements. In addition, in-person requirements often mean individuals must take time off work – and thus lose wages – in order to visit program offices. In response to COVID-19, waivers granted to state agencies by USDA provided flexibilities in administering SNAP, WIC, and other child nutrition programs and enabled families to more easily apply for and maintain benefits. These waivers reduced burdensome requirements in applying, accessing, and renewing benefits by reducing paperwork and minimizing other barriers such as face-to-face interviews and onerous verification processes. USDA should make recent waivers permanent to provide equitable and streamlined access to assistance programs.

Families with low incomes participating in federal nutrition programs also experience challenges in increasing economic mobility due to income and asset limits across programs. These limits often cause churn for families with inconsistent income and cliff effects – when a family’s income increases, but they experience a net loss of resources following benefit reductions or being cut off programs – for families with increasing incomes. Research from Children’s HealthWatch has demonstrated the harm that reduction of benefits and loss of program eligibility impact child health. For example, we have found

that when family's SNAP benefits are reduced or cut off as a result of increased income, children are more likely to be in fair or poor health, to be at risk of developmental delays, and experience hardships such as food insecurity and forgone healthcare.⁸ This is a result of strained resources despite an increase in work income, which forces families to choose between basic needs. The subsequent experience of hardship has significant implications for the health, education, and economic stability of families and children across their lifespan.

Families who earn low wages often have incomes that fluctuate based on seasonal earnings and irregular hours.⁴ However, many federal assistance programs do not adequately account for this in their design or implementation. As a result, families may be cut off from programs intermittently, jeopardizing their health and financial resources as well as a potential cascade of losing access to other public benefits. For example, if a family is cut off from SNAP, they may also lose access to utility rate discounts or automatic certification of school-age children for free school meals. In some states, loss of SNAP participation can also mean a temporary loss of Medicaid benefits, resulting in the need to reapply for Medicaid or other benefits. This churn is costly in time and effort both for families and for state governments.⁹ Moreover the avalanche effect of multiple losses of support can harm the health and well-being of children and adults, especially the youngest children, and their families and threaten the economic stability of entire households. Federal nutrition assistance programs must be re-designed to account for income fluctuations by calculating income over a longer period of time and implementing protections to prevent simultaneous benefit losses.

Further, we know from our interview data that families want to and are often able to work or work more hours; however, the cliff effect across programs can force families to choose between accepting an increase in hours or wages and affording basic needs, further trapping them in a cycle of poverty and preventing them from achieving economic growth and mobility.¹⁰ To address the cliff effect and avoid an abrupt reduction or loss of benefits, a more gradual decline in benefits across assistance programs should be implemented. For example, SNAP has a logical phase-down of benefits as income increases. Still, when people abruptly lose all SNAP benefits at the top end of income eligibility, they may also lose other benefits and do not have enough time to adapt to new income realities and may report that they experience food insecurity despite higher wages. USDA and other agencies could also enable states to offer a temporary extension of benefits at the preexisting level to all households phasing out of assistance programs for employment that pays sufficiently to end their program eligibility. The additional time would help families navigate pay lags and adjust household budgeting. These steps, in concert with others, are necessary to ensure no family is worse off when they work and earn more. This is necessary not only to improve the health and economic status of individual families and children, but to promote economic participation and prosperity across the country.

Within the Child and Adult Care Food Program (CACFP), the USDA can take steps to streamline access for both parents and providers, improve the programs ability to reach families with low incomes and promote equity. Currently, USDA requires proprietary (for-profit) child care centers to certify eligibility for CACFP monthly, even though they do not have more frequent or significant changes in enrollment compared to other child care settings. This creates unnecessary and significant administrative burden for centers, resulting in barriers to participation. USDA should allow for annual certification for proprietary child care centers. USDA can also streamline access by reducing area eligibility for home-based child care centers, or making permanent the COVID-19 waiver eliminating the requirement. This modification is aligned with other evidence-based suggestions to improve access and reduce administrative cost, and would allow greater CACFP eligibility among child care providers.¹¹ This would likely increase participation across low-income communities, particularly in rural areas, and minimize

paperwork and administrative duties. Similarly, research has shown that CEP in school meal programs has had significant success in increasing participation, eliminating administrative burden of processing and verifying applications, and overall reducing administrative costs all without affecting the financial bottom-line of food service operations.¹² Both lowered or eliminated area eligibility threshold for family child care providers and the creation of CEP for child care centers would significantly streamline access to healthy meals for young children, better serve diverse communities, and improve administrative ease of CACFP participation. Children’s HealthWatch also endorses the Food Research & Action Center’s recommendations to streamline program requirements and maximize technology.¹³

Are there data-sharing activities in which USDA agencies should engage, so that repetitive collections of the same data do not occur from one USDA component to the next?

All of the barriers described throughout this memo are compounded when families are required to complete multiple, repetitive applications and processes across benefit programs. The development of universal and widespread tools for coordination, such as data-sharing through the creation of a common application portal for safety-net programs, is critical to support this effort. Research from Children’s HealthWatch found that families who received housing subsidies, SNAP, and WIC were 72 percent more likely to be housing secure than those who received a housing subsidy alone.¹⁴ Receiving support for two essential expenses – housing and food – likely allowed families to dedicate what they would have spent on those bills to other basic needs, like utilities, health care or child care.¹⁹ These findings in addition to others support the need for and impact of co-enrollment of families in government assistance programs as a mechanism to help families access the most comprehensive coverage and benefits for which they are eligible.¹⁵ Furthermore, leveraging Medicaid expansion infrastructure to enroll patients in multiple programs based on eligibility would improve health and economic security without overburdening clinical delivery systems or state administering agencies.¹⁶

How can USDA use technology to improve customer service? Do you have suggestions on how technology or online services can help streamline and reduce regulatory or policy requirements? What are those technological programs or processes and how can USDA use them to achieve equity for all?

Children’s HealthWatch recommends that USDA utilize technology to streamline access and decrease barriers to participation in the ways outlined above, including to:

- Make permanent COVID-19 waivers to allow online and phone certifications, trainings, education and other remote processes.
- Track peak times of in-person, online or telephonic contact and adjust staffing accordingly to decrease wait times for assistance.
- Improve outreach and awareness to ensure that all families receive the benefits for which they are eligible.
- Coordinate and link data across government agencies (e.g. through the creation of a Common Application).

USDA should also engage in a large outreach and awareness campaign to raise awareness of these options, once implemented. For additional strategies and case studies, we recommend the report *Technology, Data, and Design-Enabled Approaches for a More Responsive, Effective Social Safety Net*.¹⁷

While utilizing technology will allow for better engagement and decreased barriers among many families, USDA must be aware that those with limited access to technology will continue to face difficulties. As such, these options should always be in addition to other mechanisms for program access and delivery. However, one opportunity to address this gap is to make families aware of other assistance programs that provide free or low-cost access to technology. For example, USDA could inform participants of the AT&T access program, which provides discounted Internet service to households that participate in SNAP.^{2,18}

What suggestions do you have for how USDA can effectively assess and measure its outreach and inclusion of underserved groups and individuals?

In assessing outreach and inclusion of underserved populations, USDA must analyze several outcomes and equity metrics. These include program uptake, participation, and churn rate, with particular attention to data disaggregation. Specifically, as stated in the Racial Equity Methodology³ when evaluating program outcomes, agencies must “analyze the outcomes for each racial and ethnic group (e.g. what is the racial and ethnic makeup of the population that this program serves? How does each racial and ethnic group fare with each outcome that is measured—for example, iron levels or food insecurity?)” This recommended methodology states:

“If outcomes are not equal across participants of all races, then there is room to use a strengthened racial equity lens to adjust the inputs to achieve equal outcomes. The way to do this is to put the needs of communities of color at the center of the analysis in order to identify whether or how barriers to equal outcomes are addressed and how these program or policy elements can be improved.”³

Furthermore, agencies should analyze why and how the outcomes of each racial and ethnic group are different. The Racial Equity Methodology states:

“Once racial and ethnic disparities are identified, it is important to respond to the history and other factors that created these divides. Understanding the “why” and “how” behind the data is critical, especially when determining which recommendations are the most culturally sensitive and appropriate in addressing the historical trauma associated with the disparity.”³

Have you made recommendations for improvement in the past to USDA? If so, please list or attach those recommendations.

Children’s HealthWatch has recently submitted comments (linked below) to USDA in response to several proposed regulatory rule changes. This includes:

- [Opposition to rollback of nutrition standards for school meals](#) (re: USDA Docket ID FNS-2020-0038. Restoration of Milk, Whole Grains, and Sodium Flexibilities).
- [Opposition to the standardization of state heating and cooling utility allowances](#) (re: FNS Docket No. FNS-2019-0009. Supplemental Nutrition Assistance Program: Standardization of State Heating and Cooling Standard Utility Allowances).
- Opposition to proposed changes to Broad Based Categorical Eligibility (FNS Docket No. FNS-2018-0037. Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program).
 - o [Comment period 1](#)
 - o [Comment period 2](#)

- [Opposition to changes to SNAP requirement for able-bodied adults without dependents](#) (RIN 0584-AE57. Supplemental Nutrition Assistance Program (SNAP): Requirement for Able-Bodied Adults without Dependents).

¹ Coleman-Jensen A. Working for Peanuts: Nonstandard Work and Food Insecurity across Household Structure. *Journal of Family and Economic Issues*. 2010;32(1):84-97.

² Gamblin M, Brooks C, Bassam Abu Khalaf N. Applying Racial Equity to US Federal Nutrition Assistance Programs: SNAP, WIC, and Child Nutrition. Bread for the World Institute; 2020. Available at <https://www.bread.org/library/applying-racial-equity-lens-end-hunger>

³ Gamblin M. Methodology: Applying a Racial Equity Lens to Anti-Hunger Policies. Bread for the World; 2021. Available at http://files.bread.org/institute/report/racial-equity/report-methodology.pdf?_ga=2.178852899.621679317.1593104854-1534314108.1536929838

⁴ Poblacion A, et al. The State of Hunger in Massachusetts. 2020. Available at <https://childrenshealthwatch.org/wp-content/uploads/CHW-State-of-Hunger-MA-web-101520.pdf>

⁵ Massachusetts Healthy Incentives Program (HIP). Commonwealth of Massachusetts; 2021. Available at <https://www.mass.gov/service-details/massachusetts-healthy-incentives-program-hip>

⁶ Campaign for Healthy Incentives Program Funding. MA Food System Collaborative; 2021. Available at <https://mafoodsystem.org/projects/HIP/>

⁷ Bartlett S, et al. Evaluation of the Healthy Incentives Pilot (HIP): Final Report. Food and Nutrition Service, Office of Policy Support, United States Department of Agriculture; 2014. Available at <https://www.fns.usda.gov/snap/hip/final-evaluation-report>

⁸ Ettinger de Cuba S, Chilton M, Bovell-Ammon A, Knowles M, Coleman SM, Black MM, Cook JT, Cutts DB, Casey PH, Heeren TC, Frank DA. Loss of SNAP is associated with food insecurity and poor health in working families with young children. *Health Affairs*. 2019;38(5):765-73.

⁹ Mills G, Vericker T, Koball H, et al. Understanding the rates, causes, and costs of churning in the Supplemental Nutrition Assistance Program: Final Report. Prepared by Urban Institute for the US Department of Agriculture, Food and Nutrition Service; 2014.

¹⁰ Thomas D. The Cliff Effect: One Step Forward, Two Steps Back-Policy Design as a Disincentive for Economic Mobility. *PublicINReview*. 2013;1(3):34-51

¹¹ Urahn S, et al. Healthier Nutrition Standards Benefit Kids: A health impact assessment of the Child and Adult Care Food Program's updated rules for meals and snacks. A report from The Pew Charitable Trusts and Robert Wood Johnson Foundation; 2017. Available at https://www.pewtrusts.org/-/media/assets/2017/08/kshf_healthier_nutrition_standards_benefit_kids_hia.pdf

¹² Harkness J, Logan C, Shivji A, Nisar H, Connor P. Community Eligibility Provision Evaluation: Year 3 Addendum. Food and Nutrition Service, Office of Policy Support, United States Department of Agriculture; 2015. Available at <https://files.eric.ed.gov/fulltext/ED557894.pdf>

¹³ Child Nutrition Reauthorization: Priorities to Improve and Strengthen Child Nutrition Programs. Food Research & Action Center; 2021. p4. Available at <https://frac.org/wp-content/uploads/CNR-Priorities.pdf>

¹⁴ Ettman L, Ettinger de Cuba S, Sheward R, Sandel M, Coleman S. When 2 + 2 = 5: How co-enrollment in public assistance programs leads to stable housing for America's young children. 2015. Available at https://childrenshealthwatch.org/wp-content/uploads/Co-Enrollment-Brief_FINAL.pdf

¹⁵ Shaw T, Street L, Gonzales S, Rosenbaum D. State innovations in horizontal integration: Leveraging technology for health and human services. Center for Budget and Policy Priorities. 2015. Available at <http://www.cbpp.org/sites/default/files/atoms/files/3-23-15fa.pdf>

¹⁶ Barnidge EK, Stenmark SH, DeBor M, Seligman HK. The Right to Food: Building Upon "Food Is Medicine". *American Journal of Preventive Medicine*. 2020.

¹⁷ Smith C, Soka S. Technology, Data, and Design-Enabled Approaches for a More Responsive, Effective Social Safety Net. 2021. Available at <https://beeckcenter.georgetown.edu/building-a-better-social-safety-net/>

¹⁸ The Access program from AT&T. Available at <https://www.att.com/support/article/u-verse-high-speed-internet/KM1094463/>