

January 5, 2015

Governor-elect Tom Wolf
Wolf Transition Committee
PO Box 22717
Philadelphia, PA 19110

Dear Governor-elect Wolf,

As representatives of organizations working each day to fight hunger and poverty in communities across the Commonwealth, we congratulate you on your election as Governor of Pennsylvania. Together we have prepared the enclosed document: "Meeting Pennsylvania's Hunger Challenge: A Briefing Paper for Governor-elect Wolf." We hope you will give our recommendations full consideration as you and your team develops your agenda.

You recently noted that one of the first steps you will take as Governor is to identify Pennsylvania's challenges. We assure you that food insecurity is a significant obstacle for millions of Pennsylvanians. Roughly one in seven Pennsylvania residents— more than 1.8 million people— are at risk of hunger. For our children, the challenge is even greater, with one in five experiencing food insecurity.

We agree that Pennsylvania must identify good people and develop diverse teams to address its challenges, including tackling hunger. To do so, we ask that you reinvigorate the Inter-Agency Council on Food and Nutrition with representation from your office and each administrative department responsible for food and nutrition programs, as well as non-profit and community representatives. We will help inform the Council, which should meet regularly and work cooperatively to improve government food distribution and nutrition programs, as well as promote public-private partnerships to fight hunger in Pennsylvania.

Fighting hunger is a critical underpinning to educational success, job creation, and improving the Commonwealth's economy. Helping families to access healthy foods is vital to a child's academic success. Children cannot learn well if they are hungry, and parents cannot stabilize their family if they are deciding whether to pay for food, rent, or heat.

Easing administrative barriers and improving participation in federal nutrition programs, including the Supplemental Nutrition Assistance Program (SNAP, formerly Food Stamps) and a wide-range of child nutrition programs, is important to the well-being of Pennsylvanians and will bring untapped federal dollars to our economy. Take SNAP as an example: in FY 2013-14 it provided more than \$2.5 billion in benefits to low-income families in Pennsylvania, which families spent at food retailers across the state, generating an additional \$4.2 billion in economic activity. We were very pleased that in your campaign you indicated a willingness to eliminate the SNAP asset test, an

unnecessary hurdle that slows access to benefits for thousands of eligible families. We fully support this policy change.

Furthermore, good nutrition supports good health. Your plans to bring full Medicaid expansion to the Commonwealth brings tremendous potential not only for better quality of life for millions of Pennsylvanians who will now be eligible for comprehensive health-care, but also for lowering medical costs over time. Better health and lower health-care costs can only be sustainably achieved if Pennsylvanians are able to readily access nutritious foods and maintain a healthy diet.

We are confident that your vision for Pennsylvania's future will inspire action for the common good. We look forward to meeting with you and/or members of your administration in the coming months to discuss our recommendations and are happy to provide additional details as needed. Our organizations are looking forward to partnering with you and your administration to ensure all Pennsylvanians have the food they need to lead healthy lives.

Sincerely,

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Meeting Pennsylvania's Hunger Challenge

A Briefing Paper for Governor-elect Tom Wolf

December 2014

I. The Magnitude of Food Insecurity and Hunger in Pennsylvania

Household Food Security in the United States, 2013, released in September 2014 by the United States Department of Agriculture's Economic Research Service, reveals that hunger (officially known as very low food security) and food insecurity have continued to remain at elevated levels in Pennsylvania households following the Great Recession. Very low food security (defined as involuntarily going without food due to not being able to afford it) affected 4.8% of Pennsylvania households in 2011-13; up from 3.4% during the 2005-07, prior to the onset of the economic recession. According to the study, 11.9% of Pennsylvania households were food insecure – lacking access to sufficient food to meet their nutritional needs.

Map the Meal Gap 2014, released in April 2014 by Feeding America, found similarly high levels of food insecurity among individuals in Pennsylvania. The only study available that provides county-level estimates of food insecurity in the United States, *Map the Meal Gap 2014* found that in 2012, 14.3% of people across the Commonwealth were food insecure, including 20.6% of all Pennsylvania children.

Other key findings from this report include:

- Nearly 1.83 million Pennsylvanians – 1 in 7 – are at risk of hunger.
- Nearly 563,000 children under the age of 18 in Pennsylvania – 1 in 5 – are at risk of hunger.
- Food insecurity exists in every single county throughout Pennsylvania – ranging from a low of 9.5% of the population in Chester County to a high of 22.1% of the population in Philadelphia County. (For more information, see Appendix 1). Child food insecurity persists at elevated rates in all 67 counties in Pennsylvania – ranging from a low of 14.6% in both Chester and Montgomery Counties to a high of 25.7% in Fayette County. (For more information, see Appendix 2).

Finally, data released in February 2013 by the Food Research and Action Center in the report *Food Hardship in America 2012* found that Pennsylvanians continue to be plagued by hunger. The data in this report is based on responses reported to the Gallup organization as part of the Gallup-Healthways Well-Being Index. The data in the report revealed that 16.5 % of Pennsylvania households answered “yes” when asked if there had been times in the year when they did not have enough money to buy food that they or their family needed.

II. The Impact of Hunger on Children

Although food insecurity is harmful to any individual according to data compiled by Feeding America, it can be particularly devastating among children due to their increased vulnerability and the potential for long-term complications.

Infancy & Development: Children growing up in food-insecure households are more susceptible to poor health and stunted development from the earliest stages of life.

- Pregnant women who experience food insecurity are more likely to experience birth complications than women who are food secure.
- Inadequate access to food during pregnancy has been shown to increase the risk for low birth weight in babies.
- Food insecurity has also been linked with delayed development, poorer attachment, and learning difficulties in the first two years of life.

Health Concerns: Numerous studies have found that food insecurity is associated with health problems for children that may hinder their ability to function normally and participate fully in school and other activities.

- Children who are food insecure are more likely to require hospitalization.
- Children who are food insecure may be at higher risk for chronic health conditions, such as anemia and asthma.
- Children who are food insecure may have more frequent instances of oral health problems.
- Food insecurity among young children is associated with poorer physical quality of life, which may prevent them from fully engaging in daily activities such as school and social interaction with peers.

Behavioral Challenges: Children who experience food insecurity may be at higher risk for behavioral issues and social difficulties.

- Food insecure children may be at greater risk of truancy and school tardiness.
- When they are in school, children who are food insecure may experience increases in an array of behavior problems including: fighting, hyperactivity, aggression, anxiety, mood swings, and bullying.

III. The Impact of Hunger on Older Pennsylvanians

The Spotlight on Senior Health: Adverse Health Outcomes of Food Insecure Older Americans research project, published by Feeding America and the National Foundation to End Senior Hunger, found that food insecurity among individuals age 60 and older living in the United States has a negative impact on seniors' health, nutrition, and overall well-being. Specifically, according to this publication, food insecure seniors are at increased risk for chronic health conditions. In particular, food insecure seniors are:

- 60 percent more likely to experience depression,

- 53 percent more likely to report a heart attack,
- 52 percent more likely to develop asthma, and
- 40 percent more likely to report congestive heart failure.

In addition, the study found that food insecure seniors are 22% more likely to experience limitations in their activities of daily living (ADLs), which are those fundamental activities, such as eating, dressing, and bathing, that individuals typically can perform independently.

IV. Pennsylvania's Efforts to Fight Hunger

While the federal government must play the primary role in assuring food security for all Americans, we urge your administration to make every effort to:

- Remove barriers and ease access to federal nutrition programs;
- Increase the Commonwealth's investment in emergency food, as well as support private charitable hunger relief efforts, and
- Work to create the political will to improve public policies and programs to end hunger.

As Governor, you have a critical role in solving food insecurity by clearly articulating the Commonwealth's commitment to ending hunger and by drawing attention to the scope, causes, and solutions, raising awareness and expanding the engagement of organizations in both the public and private sectors. At the same time, you have the opportunity to create the methods and means to build a food secure state. In support of this effort, we encourage the governor to:

- Establish by law a permanent **Inter-Agency Council on Food and Nutrition** and mandate that representatives of executive branch departments with responsibility for food and nutrition programs (Aging, Agriculture, Community and Economic Development, Education, Health, and Human Services) actively participate in the discussions of the Council and regularly review and present recommendations to the Governor on charitable and government food distribution and improving government food and nutrition programs.
- Appoint a **cabinet level advisor** to oversee and coordinate the Commonwealth effort to end hunger and food insecurity, coordinate the work of state departments and agencies, and enlist the active engagement of other public and private sector leaders.
- Mandate the development and release of an annual **comprehensive report on hunger and food insecurity** to describe, quantify, and assess the state government's efforts and track progress.

- Require all relevant state departments to “**cross-market**” all **low-income support programs** in communications with potentially eligible populations and coordinate anti-hunger programs to enhance the efficiency and effectiveness of these communications
- Include anti-hunger policies and appropriations as priorities on the state’s **federal legislative agenda** and in its engagement with Pennsylvania’s Congressional Delegation and with national inter-governmental associations.

V. Pennsylvania’s Administration of Federal Nutrition Programs: Maximizing Participation

The most effective federal nutrition programs are entitlement programs, allowing entities and individuals who qualify for participation to receive the benefits if sought after. These programs include the Supplemental Nutrition Assistance Program (SNAP, formerly known as food stamps) and an array of child nutrition assistance programs including the National School Lunch Program, the School Breakfast Program, the Child and Adult Care Feeding Program (CACFP), and the Summer Food Service Program (SFSP). In addition, the Special Supplemental Food Program for Women, Infants, and Children (WIC) which, while not an entitlement, has thus far been funded at a level adequate to reach current PA participants.

- A. The Supplemental Nutrition Assistance Program (SNAP):** SNAP serves as the foundation of America’s national nutrition safety net. It is the nation’s first line of defense against food insecurity, helping millions of low-income Americans put food on the table and providing benefits that are timely, targeted, and temporary. SNAP responds quickly to changes in need, with enrollment growing in response to increases in poverty and unemployment and SNAP benefits phasing out as participants get back on their feet. SNAP benefits are targeted at our most vulnerable citizens, with more than 82% of benefits going to households with children, an elderly person, or someone who is disabled. In addition to providing assistance to our most vulnerable citizens, SNAP benefits also provide a boost to local economies. According to Mark Zandi, Chief Economist of Moody’s Analytics, every one dollar of SNAP benefits that is spent generates an estimated \$1.73 in economic activity.

Leveraging federal dollars that help families, communities and businesses and maximizing SNAP participation is a key way to fight hunger in Pennsylvania. . More than 1.8 million Pennsylvanians depend on this program, most to afford an adequate nutritious diet; however, data from the U.S. Department of Agriculture shows that based on available estimates of those eligible but not enrolled, in the 2014 Pennsylvanians missed out on approximately \$110 million in SNAP benefits, and the Commonwealth on \$190 million in economic activity such benefits would have generated. As a result, additional efforts must be employed across the Commonwealth to conduct SNAP education and outreach to reach

those eligible individuals who are not yet participating in the program. In addition, research suggests that simplifying the enrollment process and eligibility requirements has the potential to increase participation rates significantly.

Recommendations for SNAP policies that should be supported and implemented at the state level:

- 1. Eliminate the SNAP Asset Test.** In May 2012, despite the fact that SNAP now boasts a fraud rate of less than 1%, Pennsylvania Department of Public Welfare (DPW) Secretary Gary Alexander reinstated the SNAP asset test, citing the need to root out waste, fraud, and abuse. The result is a test that prevents low-income people with modest resources from receiving food assistance and discourages saving, which is critical in helping families transition from poverty to self-sufficiency.

Very few SNAP applicants and recipients (less than half of one percent) have assets over the current limits – \$5,500 for most households and \$9,000 for elderly/disabled households. Yet all 1.8 million Pennsylvanians who receive SNAP must verify their assets at the time of application and re-certification. This verification requirement deters some households, particularly seniors, from applying for SNAP and creates unnecessary red tape for applicants and recipients. (According to data obtained from DPW by the Philadelphia Inquirer, during the first year of the asset test, 4,000 households lost or were denied benefits because they had too many financial resources. But, during that same time period, 111,000 households were denied benefits because they failed to provide proper documentation for the test).

In addition to deterring and creating unnecessary burdens for applicants, the current SNAP asset test increases the workload for already overburdened caseworkers who don't have the time or resources to perform the most basic aspects of their jobs, and increases the administrative costs incurred by the Commonwealth to carry out these additional tasks.

In October 2013, DPW Secretary Beverly Mackereth indicated that she would revisit the asset test, but has yet to take action. We urge Pennsylvania to follow through with this commitment and join the 36 other states who have exercised the option to eliminate SNAP asset testing.

- 2. Employ “fast track” eligibility strategies to enroll SNAP recipients into expanded Medicaid.**

The federal government said that states may use data matches to identify and enroll SNAP recipients who are not receiving Medicaid, but who are eligible for it. SNAP recipients identified in this manner could confirm that they want Medical Assistance by activating a card sent to them, enrolling in a managed care plan, or checking an “I’d like Medicaid” box on their SNAP application or renewal form. This option will help low-income Pennsylvanians get much needed

medical care, while easing the workload at County Assistance Offices. If implemented, similar strategies could help Medicaid recipients receive (100% federally-funded) SNAP benefits.

3. Improve operations at County Assistance Offices.

Too many needy Pennsylvanians cannot obtain needed SNAP benefits because of County Assistance Office (CAO) bureaucracy. Many are denied despite being eligible, others are unable to renew their benefits, and still more are deterred from applying because processes are needlessly cumbersome. To dramatically improve customer service at the CAOs, DPHS should:

- a. Ensure adequate staff.** The CAOs simply do not have enough staff to do the job well, resulting in lost paperwork and unanswered phone calls. The ratio of CAO staff to cases handled has declined 38% since 2004.
- b. Reduce verification requirements.** The SNAP application process demands too many pieces of verification, that is, paperwork proving each aspect of eligibility. DPHS should rely on online sources rather than pieces of paper, and reduce the amount and type of required paperwork, especially for issues that are rarely reviewed.
- c. Allow interviews on demand.** Households applying for or renewing SNAP benefits must be interviewed, typically by phone. They are sent a notice with a time when the interview will take place, with no opportunity to choose the interview time. If the time is inconvenient, or the worker neglects to call at that time, applicants may be unable to reach anyone at the CAO to reschedule. Instead, the CAO should offer a 10-day window when households can call to be interviewed at their convenience.
- d. Address benefits “churn.”** A large portion of the CAO work is processing applications from people whose benefits were recently terminated, typically due to paperwork issues. Other states are using data to analyze the causes of churn and addressing them systematically.
- e. Improve notices sent to households.** Notices sent to households can be needlessly confusing, causing significant drain on staff time in simply explaining what the notices say. In particular, DPHS’s notices explaining the amount of SNAP benefits do not inform households of what housing expenses are being counted. Further, SNAP renewal notices mislead households into thinking they have more time than they really have to submit the form.

4. Continue Heat and Eat.

The Farm Bill passed in early 2014 significantly cut federal support for Heat and Eat, a program utilized by some states to maximize SNAP participant benefits. New provisions require that to be eligible for Heat and Eat, households must receive a minimum of \$20 in Low Income Home Energy Assistance Program or

LIHEAP (previously, it was as low as \$1). The current Administration blunted the potential negative impacts of the SNAP cuts by continuing Heat and Eat using reserve LIHEAP funds from 2013. This policy should continue so that families already struggling as a result of SNAP benefit cuts made effective in November 2013 are not further harmed by inadequate benefit levels.

5. Develop a thoughtful approach to SNAP Employment & Training.

The SNAP program includes funding – both 100% federal funds and unlimited 50% matching federal funds - to help recipients obtain jobs or education. This program is underused. The SNAP program should help low-income individuals get the education they need to obtain family-sustaining wages in high-priority occupations by paying tuition at community colleges for short-term programs that are not covered by federal financial aid.

In addition, DPHS should prepare for the likely reinstatement of the federal rule restricting some “able-bodied adults without dependents” (ABAWDs) from receiving more than three months of SNAP benefits in 36 months. This very harsh rule prevents individuals from obtaining SNAP even if they are actively seeking work. Pennsylvania has had a statewide waiver of this rule since 2009 because of high unemployment, but many parts the state are expected to be subject to the rule again in October 2015. Pennsylvania should ensure that all its ABAWDs are offered job training opportunities enabling them to continue to receive SNAP.

B. Child Nutrition Programs

Pennsylvania’s youth relies on child nutrition programs to support their growth and development. From before birth through high school, these programs give children the year-round support they need and provide the healthy foods needed to grow up healthy and prepared for the future.

Recommendations for Child Nutrition Program policies that should be supported and implemented at the state level:

1. School Breakfast Program

During the 2012-13 school year, 780,456 Pennsylvania children were eligible for free or reduced-price (FRP) school meals. During the same time, statewide average daily participation (ADP) among FRP eligible children was 270,332 for school breakfast, compared to 602,717 for school lunch. Thus, on an average day, only 45 low income children participate in school breakfast for every 100 low-income children who participate in school lunch meaning 55% of eligible PA students miss out on school breakfast. This rate places Pennsylvania 39th in the country, well behind the national school breakfast participation average. There are several options a PA Inter-agency Council on Food and Nutrition could explore to further promote, incentivize, and potentially require of schools regarding school breakfast in particular, as it is a vastly under-utilized program.

The Commonwealth should make changes to leverage all of the federal dollars possible to fight hunger in our children's lives. These include:

- Encouraging the use of the "Community Eligibility Provision" (CEP) in eligible school districts and schools.
- Providing administrative support to the second PA School Breakfast Challenge (SBC) which will launch during national school breakfast week (March 2-6, 2015) and run into the 2014-15 school year. In 2013-14 more than 1,000 PA schools took part in the first PA SBC (in 2013-14), which incentivized greater school breakfast participation across the Commonwealth. On average, nearly 9,400 additional students started their day with school breakfast during the challenge period. School food service staff often need help getting support from administration, teachers, and parents, and strong support from the Governor will help to highlight the importance of school breakfast programs.
- Breakfast in the classroom, "grab-n-go," as well as "breakfast after the bell" (so that students do not need to show up to school early), can all be very effective ways to increase participation. School districts and individual schools should be encouraged to adopt different school breakfast serving methods to increase participation.

2. Summer Meals

The Summer Food Service Program (SFSP) and Seamless Summer (an option utilized by providers that supply school-year meals) are critical to providing healthy meals to children in the summer when they do not have access to school meals. The difficulty, both in PA and nationally, is the programs are underutilized. Despite adding 8% more summer feeding sites across Pennsylvania, during summer 2013, fewer than 20% of the low-income Pennsylvania children who ate a school lunch during the school year were reached by summer nutrition programs. Further, many sites do not operate the whole summer, which can leave children without meals for weeks at a time.

Pennsylvania must develop a plan to improve access to summer meals for low-income children throughout the state, particularly in rural and suburban areas where transportation to sites can be a tremendous challenge. As with school breakfast, our proposed Inter-agency Council on Food and Nutrition could explore options to further promote, incentivize, and potentially require participation in the program by entities that receive state dollars to support summer programming.

For every lunch that an eligible child does not receive, the state and community miss out on \$3.41253 in federal SFSP funding. When added together, millions of dollars are left on the table.

3. The Special Supplemental Food Program for Women, Infants, and Children (WIC).

WIC provides supplemental foods, healthcare referrals, breastfeeding support, and nutrition education for low-income pregnant and postpartum women as well as infants and children up to age five who are found to be at nutritional risk. More than 250,000 Pennsylvanians rely on WIC, including more than 130,000 children and 60,000 infants.

WIC Modernization. Pennsylvania can act today to modernize WIC. The WIC program plays an important role in providing access to wholesome food and related services to women, infants, and children at nutrition risk. In the last Child Nutrition Reauthorization, states were required to modernize the WIC payment process by 2020, to move from paper coupons to an electronic payment method. Nine states have already implemented this change and others are moving to do the same. Pennsylvania should join this group and make WIC more accessible for participants and more efficient for the state.

VI. Strengthening Public-Private Food Assistance Partnerships

Across Pennsylvania, 1 in 7 people are at risk of hunger and may not know where their next meal is coming from. In response, the network of charitable food providers across the Commonwealth collects and distributes grocery products; involves the community as food donors, volunteers, and financial supporters; and collaborates on programs to empower the needy to meet their own nutritional needs. Together with regional food banks, this system includes food pantries, soup kitchens, shelters, food rescue organizations, and other providers. This private charitable system of hunger relief – sometimes referred to as the emergency food assistance network – must remain strong and viable to meet the immediate needs of individuals and families threatened with hunger.

If we are to meet the immediate needs of people in our community challenged by hunger, the private charitable food distribution network must have access to the assistance, support, and resources needed to get more food to more people more frequently. Food banks, food pantries, and other private sector providers must continue to develop the capacity to serve, identify new sources of food, respond to gaps in services and new areas of need, and collaborate with other public and private organizations to meet people's needs. Federal, state, and local governments provide vital funding and administrative services for important food programs. Increased funding should be provided to these programs to help the private charitable network close the significant gap between community needs and available food assistance. These governmental programs work hand-in-hand with the private charitable system and are important in addressing the demands on and the capacity of the private food assistance system. These programs include the State Food Purchase Program, the Emergency Food Assistance Program, the Commodity Supplemental Food Program, the Pennsylvania Agricultural Surplus System, and the Neighborhood Assistance Program.

1. State Food Purchase Program

Pennsylvania's State Food Purchase Program (SFPP) has become an indispensable source of critical resources for food banks, making it possible for them to acquire and distribute millions of pounds of nutritious food. SFPP enables Pennsylvania's private charitable food distribution network to provide nutritionally balanced food packages to low-income families, children, seniors, and others hungry and threatened by hunger. In addition to providing grants to organizations in all 67 counties for the direct purchase of quality foods and nutritional supplements for distribution to Pennsylvanians in need, this program also makes funds available to meet critical transportation and infrastructure requirements and to cover the handling charges associated with accessing federal bonus food commodities through TEFAP (The Federal Emergency Food Assistance Program).

SFPP has been an essential tool for Pennsylvania's food banks and food pantries in the effort to provide for our most vulnerable citizens. The current state budget provides \$17.438 million for SFPP, essentially flat-funding the program for another year. If SFPP funding had kept pace with increases in food prices, the program would need \$25.7 million this fiscal year just to break even. In fiscal year 2015-2016, anti-hunger groups are recommending an appropriation of \$21 million, representing the mid-point between the current funding and what would be required if the SFPP were to make up for the loss of spending power due to food cost inflation since fiscal year 2006-2007.

2. Pennsylvania Agricultural Surplus System

Act 113 of 2010, signed by Governor Rendell after unanimous passage in both the House and Senate, provided for the establishment of the Pennsylvania Agricultural Surplus System (PASS) to identify sources of surplus agricultural products and coordinate the distribution of surplus foods to the food banks of the Commonwealth. Unfortunately, no funding has been provided since the passage of this legislation. In a 2008 "PASS pilot," 128,740 pounds of Adams County apples (in 3 lb. bags) were distributed by the Central Pennsylvania Food Bank to 42,914 families in 30 counties. The retail value of the apples was \$188,604; the actual cost was just \$41,180. Even a minimal investment of Commonwealth funds to make PASS a reality would yield substantial benefits for both low-income Pennsylvanians and Pennsylvania's agricultural producers.

3. Neighborhood Assistance Program

For more than 25 years, the tax credits made available through the Neighborhood Assistance Program (NAP) have been an effective incentive for Pennsylvania businesses to donate food and funds to food banks throughout the Commonwealth. In the last legislative session, charitable food programs were explicitly added to the program.

VII. State Tax Policy

In the last legislative session, the General Assembly gave serious consideration to replacing property taxes with an increased and expanded sales tax. The proposal included *taxation of food* excluding certain items which are WIC eligible. Pennsylvanians already struggling to make ends meet and feed their families would suffer from the state increasing the cost of their food with a 7% sales tax.

First and foremost, the proposed "WIC fix" would provide little relief since 80-90% of groceries are not WIC eligible; including all meat and poultry products (including beef, pork, lamb, chicken and, turkey), fish and seafood (other than certain types of canned tuna and canned salmon), yogurt, pasta and pasta sauces, dried fruits and vegetables, and nuts. In addition, this approach would invite lawsuits by food manufacturers given the preferential tax treatment of specified products. Furthermore, accurately applying a food tax upon some food products and not others would present significant challenges for retailers, as would monitoring and enforcement by the state administration.

VIII. Advocating for Strong Federal Support of Crucial Anti-Hunger Programs

We believe it is of utmost importance that your Administration give high priority to communicating with the federal government and the Pennsylvania Congressional delegation on food and nutrition policies, including supporting (or opposing) legislation and actively pursuing federal grants and program improvement opportunities.

A. Supplemental Nutrition Assistance Program

While a comprehensive Farm Bill was passed in early 2014 and is not due to be reauthorized until 2019, there is ample reason to believe SNAP will remain a target for cuts. Pennsylvania residents, as well as our state economy, cannot bear additional SNAP cuts following those implemented in November 2013.

Recommendations for SNAP policy that should be supported by the Commonwealth at the federal level:

- 1. Improve Benefit Adequacy:** According to *Map the Meal Gap, 2012*, the average cost of a meal in Pennsylvania is \$2.75. Yet, the average SNAP benefit per person, per meal is only \$1.40. As a result, many SNAP recipients find that their benefits only last them through the third week of the month, leaving recipients scrambling to find enough food – and increasing the burdens on food pantries run by our nation's charities. This data underscores the need for the U.S. Congress to pass legislation adjusting how SNAP benefits are calculated, resulting in benefit levels that more accurately reflect the true cost of obtaining a healthy, nutritious meal.
- 2. Oppose Efforts to Block Grant or Otherwise Cut SNAP Funding:** SNAP helps nearly 2 million low-income Pennsylvanians put food on the table, protecting them from hunger and promoting nutrition. One of the greatest

strengths of SNAP is its ability to respond quickly to changes in need, with enrollment growing in response to need arising from increases in poverty and unemployment or in response to a natural or man-made disaster. Under ongoing proposals to block grant and cut funding levels for SNAP, the program's ability to respond immediately to fluctuations in the economy or other widespread, emergency needs would be lost. Block granting SNAP would eliminate consistent eligibility rules and benefit levels that currently exist across all states to ensure that eligible low-income families are guaranteed food assistance when they fall on hard times, regardless of where they live. Combined with proposed caps and restrictions on SNAP funding, a block grant would require drastic cuts to SNAP benefit levels, restrictions on eligibility, or both. Simply put, proposals to block grant and/or cut funding levels for SNAP would weaken safety net programs for low-income families and lead to an increase in hunger in Pennsylvania.

B. Federal Child Nutrition Programs

Next year Congress will be considering a number of nutrition programs as part of the Child Nutrition Reauthorization (CNR). Programs that will be reauthorized include the *School Breakfast Program, National School Lunch Program, Child and Adult Care Feeding Program, Summer Food Service Program, and the Special Supplemental Food Program for Women, Infants, and Children (WIC)*. These programs address the needs of specific populations, especially children of families with low-incomes and each are important to the overall health and well-being of Pennsylvania's children.

Recommendations for Child Nutrition policies that should be supported by the Commonwealth at the federal level:

- 1. School Meal Nutritional Standards:** At the federal level, there remains a possibility that school meal nutritional standards that have gone into effect recently could be rolled back. Your administration may need to call on the PA federal delegation to keep the improved standards in place. Staff at PDE can speak to the targeted and small changes to the law that may be needed (for instance snack rules are particularly difficult for some schools to navigate, and could be phased in on a slower timeline). However, improved nutrition standards should not be dismantled due to minor tweaks that may be needed.
- 2. Area-Eligibility for Summer Meals:** Currently, federal rules use an overly restrictive area eligibility test to provide reimbursements for summer meals.¹ That test defines a low-income area as one where more than 50% of children are eligible for free or reduced-price (FRP) school meals. Prior to 1981, the level was 33%. High-need rural and suburban areas throughout the Commonwealth have a hard time meeting this 50% requirement since poverty is less concentrated. Congress should lower the

¹ This also impacts after-school meals and the Child and Adult Care Food Program (CACFP)

area eligibility test requirement from 50% to 40% so more communities can serve healthy meals to low-income children. Many communities in PA would benefit from this change

3. **Summer Electronic Benefits Transfer Cards:** The Stop Summer Hunger Act of 2014 (S.2366), based on a USDA pilot project that was launched in 14 demonstration sites in 2011 and 2012, promotes a successful model that should be adopted in CNR. The pilot allowed families living too far from congregate summer feeding sites to receive monthly benefits of \$60 per child in the form of a summer Electronic Benefits Transfer card (EBT), just as SNAP benefits are dispersed. Results from the pilot project in 2012 found that very low food insecurity decreased by 33% for children in participating households. Many areas in PA would benefit from this approach.

C. The Emergency Food Assistance Program (TEFAP) and the Commodity Supplemental Food Program (CSFP)

TEFAP is a means-tested federal program that provides food commodities at no cost to low-income Americans in need of short-term hunger relief through emergency food providers like food banks, pantries, soup kitchens, and shelters. The USDA pays for the costs of processing, packaging, and shipping commodities to each state. The USDA also provides states with funding to assist with the storage, transportation, and distribution of TEFAP commodities. Unfortunately, the funding that is annually appropriated by Congress for this purpose – typically between \$49 and \$50 million – is only half of the \$100 million that Congress is authorized to appropriate. As a result, states and emergency food providers are often forced to divert funding from other programs to pay for the costs associated with storing and distributing TEFAP commodities. If Congress were to appropriate full funding for TEFAP storage and distribution, Pennsylvania would see approximately \$1.8 million in additional funding – funds that could be used by emergency food providers to purchase additional food supplies to feed the more than 2 million unique clients they are currently serving each year. CSFP leverages government buying power to provide nutritious food packages each month to more than 34,000 low-income Pennsylvania seniors with incomes less than 130% of the Federal Poverty Line (approx. \$15,171 for a senior living alone). CSFP will require additional support to expand the program to every state and to more counties within states already served by the program.

IX. Conclusion

Thank you for giving your consideration to these proposals, which grow out of our joint, longstanding work to make sure Pennsylvanians have access to the food they need. We look forward to making a fresh start with your administration to ensure that all residents in the Commonwealth of Pennsylvania receive adequate food and nutrition to lead healthy and productive lives.