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NATIONAL COMMISSION ON HUNGER

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**Respectfully submitted by:
Hunger Solutions New York**

Good Morning, my name is Linda Bopp, Executive Director of Hunger Solutions New York. I'd like to thank all the members of the National Commission on Hunger, particularly the three Commissioners with us today, Commissioner Chilton, Commissioner Doar, and Commissioner Sykes, for the important work you each do individually and for your collective work to address food insecurity and hunger in the United States.

I would be remiss if I did not acknowledge Commissioner Sykes for his unique role in founding Hunger Solutions New York, formerly the Nutrition Consortium of New York State, and for his role in developing the legislation that created the Nutrition Outreach and Education Program; New York State's SNAP outreach, education and application assistance program as well as outreach and education for the School Breakfast and Summer Food Service Programs.

The work of this Commission is critical given the prevalence of food insecurity and very low food security in the nation and in New York State. Very low food security, the topic on which Hunger Solutions New York was asked to focus, is an indication that there has been an involuntary reduction in quantity and quality of food, and disordered eating patterns such as skipping meals or not eating for a whole day.

According to the USDA's most recent data, in 2013, 14.3% of US households experienced food insecurity and of those, 5.6% experienced very low food security. New York State's rates were close to the national average at 14% and 5.2%, respectively. It is important to note that food insecurity in New York State has increased by 4% over the 2001-2003 (average), and very low food security has increased by 2.1% over the 2001-2003 (average). Both are statistically significant increases.

Nearly 21% of US households with children were food insecure sometime over 2010-11 (average) and in 10% of all households with children, one or more of the children were food insecure at some time during the year. In 1.0% of households with children, one or more child experienced very low food security – where children were hungry, skipped a meal, or did not eat for a whole day because there was not enough money for food. In addition, three quarters of households with food-insecure children had one or more adult in the labor force, either full time (60 percent) or part time (15 percent).

Also of concern is that among NYS's older adults in 2012 3% were "facing hunger" which equates to USDA's Very Low Food Security measure. These statistics illustrate that people are struggling from cradle to grave. All of these statistics require urgent attention and speak to the necessity, and timeliness, of this Commission.

Hunger Solutions New York, formed in 1985 as the Nutrition Consortium of New York State is a statewide non-profit organization. Our mission is to alleviate hunger for all New Yorkers. Our goal is to maximize participation in the federal nutrition assistance *entitlement* programs by all who are eligible.

We pursue our goal by promoting: awareness of hunger in communities; awareness of programs that address hunger; public policies that contribute to ending hunger; and public awareness of the economic, educational, and health benefits that accrue to individuals, families, households and communities as a result of nutrition assistance programs. These efforts improve the health and well-being of New Yorkers while boosting local economies throughout the state.

Hunger Solutions New York manages the statewide Nutrition Outreach and Education Program (NOEP). NOEP is one of the largest SNAP outreach, education and application assistance programs in the country and is a nationally recognized model for such. In 2013, the Food Research and Action Center (FRAC) awarded Hunger Solutions New York with the first "Innovation in SNAP Outreach" Award for NOEP's exemplary and innovative work to connect veterans and military families to SNAP benefits.

NOEP is a unique model that combines statewide information, education and technical assistance for several nutrition assistance programs with community-based services. At the community level, NOEP Coordinators provide outreach, education, and application assistance to potentially eligible SNAP households. In addition, NOEP Coordinators work closely with households throughout the SNAP application and benefit determination process to eliminate barriers to participation and/or an appropriate determination. NOEP Coordinators also conduct outreach and education for the School Breakfast and Summer Food Service Programs and refer clients to the full spectrum of nutrition assistance programs available to them.

Currently, NOEP services are provided by 74 NOEP Coordinators in 56 counties through 52 community-based organizations that enter into contracts with Hunger Solutions New York. Using the average of the three years July 1, 2011 – June 30, 2014, on an annual basis, NOEP provided the following:

**Nutrition Outreach and Education Program
(NOEP)
Annual Average for three years 2011-2014**

NOEP Targets	Annual Average for years(2011-2014)
Provide SNAP Info directly through Face to Face Contacts	178,734
SNAP Prescreenings	58,516
Household Enrolled in SNAP	28,563
Federal SNAP Dollars into NYS <i>*based on \$274 avg monthly benefit & 9 month avg time spent on SNAP</i>	\$ 70,435,536
Special Populations Served	
Disabled	5,222
Immigrants	9,115
Homeless	720
Veterans and Military Families	1,515
College Students	991
Seniors	13,660
Children	19,631

The SNAP benefits received by these households enabled hungry New Yorkers to feed themselves and their families as well as strengthen small businesses, local grocers, and New York's farmers.

As I mentioned earlier, it is through the NOEP Coordinators, as well as our statewide work, efforts with partner agencies, and efforts with neighboring states that we learn about, and learn from, communities' and clients' experiences with food insecurity.

I'd like to share a couple examples of the clients we have learned about through NOEP and their unique circumstances.

We learned about a 61-year-old woman, we'll call her Ellen, who was living in subsidized housing and had just returned from the hospital after being ill with pneumonia. Ellen was still recovering and was home bound with no car. Ellen contacted the NOEP Coordinator after Ellen's neighbor explained to Ellen that the NOEP Coordinator had helped her. Given Ellen's circumstances, the NOEP Coordinator scheduled a home visit. Upon meeting Ellen, the NOEP Coordinator was alarmed at how frail Ellen was. As the NOEP Coordinator said, "she looked so frail, I thought she was going to die by the next day." The NOEP Coordinator noticed that there were only two pieces of furniture in the apartment. After talking for a few minutes, the NOEP Coordinator asked if she could check to see what food Ellen had available. Ellen agreed and the NOEP Coordinator found that the refrigerator was completely empty, and the only food in the whole apartment was one can of spam in the cabinet.

The NOEP Coordinator immediately went to her agency and returned that same day with food from her agency's food pantry. When the NOEP Coordinator returned, she sat with Ellen and completed a SNAP application. The NOEP Coordinator also referred Ellen to several food pantries in the local area, and made sure Ellen could arrange a ride to one of the food pantries. The NOEP Coordinator also made a referral to the Office for the Aging and recommended that Ellen be considered for a home companion aid.

Ellen was approved for expedited SNAP benefits meaning she received her initial SNAP benefits within 5 days. Ellen has been receiving SNAP benefits for approximately 6 months and has fully recovered from pneumonia. Ellen told the NOEP Coordinator that when they met, Ellen was at the lowest point in her entire life.

We also learned about a grandmother who had to take in and raise three of her grandchildren, all teenage boys. Even though she was working full time, she could not afford to feed them. She applied for, and is now receiving, SNAP benefits which allows her to better afford the nutritious foods that she and her grandsons need.

An injured veteran was unable to work, and afraid of the "system" and reaching out for help. After talking with a NOEP Coordinator, he decided to take a chance and apply for SNAP benefits, given that he could not afford meals for himself. Once he was approved and was able to purchase nutritious foods at the local grocer, he had the faith to apply for Social Security Benefits and seek help at the Veteran's Administration. He is now able to live a more dignified, independent life.

A family of five relocated to Saratoga County for a work opportunity. Unfortunately, soon after arriving, the company closed and the father ended up losing this job. He got a part-time job right away at Lowe's. They live in a rural setting, so while her husband was at work, his wife had no access to a car. They were struggling to pay for their food and rent. The family applied for SNAP, and received benefits. This allowed them to afford the nutritious foods they needed, and pay their rent. The father got a second part time job, and now they receive a smaller amount of SNAP benefits. He continues to look for full time employment.

For every example of the New Yorkers NOEP serves, there are thousands more. Every person who finds themselves in need of assistance has a unique situation from which we learn so much about what works and what does not work in our society's safety net.

Among the many lessons we have learned from our direct experience and learning from others are the following:

We have learned that USDA's nutrition assistance programs are successful in boosting nutrition, health, learning, and household stability. In particular, SNAP plays a critical role in alleviating poverty and food insecurity and in improving dietary intake, weight status, health, and well-being especially when benefits are closer to adequate. For example, the temporary increase in SNAP benefit levels from the 2009 American Recovery Reinvestment Act (ARRA) helped reduce the food insecurity rate by 2.2 percentage points and reduce very low food security by 2.0 percentage points between December 2008 (pre-ARRA) and December 2009 (about eight months post-ARRA) (Nord & Prell, 2011). In addition, two years after the temporary ARRA boost, young children in households receiving SNAP benefits were significantly more likely to be "well" than children from non-participating low-income households; such a difference was not observed prior to the benefit boost (March et al., 2011).

We have learned that federal nutrition assistance programs reduce poverty: SNAP kept 381,000 people out of poverty in NYS from 2009-2012, including 162,000 children. SNAP has an especially pronounced impact on poverty among the poorest families with children: close to half (45 percent) of SNAP participants are children, and SNAP benefits are targeted to the poorest households. In 2013, SNAP kept 1.3 million children out of "deep poverty" (incomes below half of the poverty line, or roughly \$9,800 for a family of three). Additionally, SNAP kept 2.8 million people of all ages out of deep poverty.

We have learned that very low food security is likely to occur in households facing multiple hardships such as financial, health, and social hardships. We have learned that very low food security is more prevalent in households with certain characteristics such as households with children headed by a single woman, women living alone, men living alone, Black, non-Hispanic, and Hispanic households. However, the highest prevalence of very low food security is among households with incomes below 185% of the federal poverty line meaning inadequate financial resources is the overwhelming cause of very low food security.

We have learned that people need access to services and education about the service's existence. We have learned that outreach paired with application assistance and efforts to reduce barriers to participation yields better results for individuals than outreach alone. The SNAP application process is incredibly complex. Without application assistance and individualized assistance to eliminate barriers, the hardest to serve, often those suffering very low food security, do not complete the process and/or might not receive the appropriate benefit.

We have learned that SNAP's complexity results in multiple local and individual barriers. NOEP Coordinators identify and resolve approximately 200 local and individual barriers each year including application, participation and documentation barriers; budgeting errors; barriers that apply to special populations like seniors, students and non-citizens; work requirement barriers; EBT card barriers; and recertification barriers. The existence of these barriers demonstrates the complexity of the SNAP and the need for NOEP-like services, especially for very low food secure households.

We have learned that SNAP's countercyclical design worked perfectly during the recession; participation went up and now that the economy is slowly recovering, participation is going down.

We learned that it is critical to ensure SNAP is available to people as quickly as possible when they experience food insecurity to keep them from falling into very low food security.

We have learned that current SNAP allotments do not get people through the month. The inadequacy of benefits results in added strain on the emergency food system.

We have learned that the current method of decreasing benefits for every additional dollar earned creates a "cliff," perpetuates very low food security and results in a disincentive to work.

Nutrition assistance programs help reduce the gap between low wages and basic family needs. They are also an important work support intended to help families stay healthy and move towards economic independence. However, just when some families become more self-sufficient by earning even a modest increase in income, their progress can lead to termination of benefits. This creates a gap between basic expenses and total family resources. Families suffer a substantial net loss by earning more, and struggle, yet again, to buy groceries. In the policy world, this is called the "cliff effect"—it shows that rather than a steady climb to economic independence, families "fall off a cliff" when they try to climb higher.

SNAP recipients are pushed out of the program once they start to earn more money. Food insecurity among children was more likely for households that had left SNAP during the previous year than for those currently receiving benefits. This finding suggests that some households left the program even though their economic resources were not yet adequate to meet their food needs.

We have learned that penalizing people who are unable to find work can have devastating effects and increases very low food security. We have learned this from our neighbors in Vermont and Maine. In Vermont, approximately 4,500 unemployed childless adults, referred to as Able-Bodied Adults Without Dependents (ABAWDs) lost their SNAP benefits on February 1, 2014. Few were able to find work. Even fewer were able find qualifying volunteer opportunities called "work for benefits" in Vermont. For those that did, they struggled to navigate the paperwork burden required to document their volunteer hours at a non-profit. Job training programs through the Vermont Department of Labor were not made available to participants until July and August, six months after most participants lost benefits. Vermont was not well prepared for the return of the work rules and time limits. Computer programming was not in place; work training programs were not developed; forms were not created; and staff, community organizations, and participants were not given sufficient time to learn the rules and requirements and prepare.

Between January and March of 2015, 9,000 people have lost SNAP benefits due to the return of the ABAWD rules in Maine. This includes over 1,000 veterans. Many of those who lost their SNAP benefits are actually working but if they can't get at least 20 hours a week from their employer or find a second job, then they lose their SNAP benefit. Training programs are scarce. The Main Department of Health and Human Services created only 1,000 short term

training slots to serve the nearly 9,000 individuals that have already been affected by this limit. Even worse, these slots are only available to people within 30 miles of Portland, Lewiston, Augusta and Bangor. Non-profit agencies throughout the state have been overwhelmed by people who want to volunteer; they don't have the resources to meet the demand.

In 2016, over 1 million people face losing SNAP benefits including 60,000 veterans, with the elimination of the ABAWD Waiver. Individuals considered ABAWD's are extremely poor. While on SNAP their average income is just 19% of the poverty line for an individual, or \$2,200 on an annual basis. Over 80% have incomes below half of the poverty line, or \$5,835. We need to learn from the recent experiences in Vermont and Maine before similar devastation occurs across the county.

Evidence shows that the circumstances and conditions that lead to food insecurity and very low food security are many, varied, and unpredictable. Evidence also shows that the negative impacts are broad, deep, and can have lifelong effects. Several new research studies are showing a positive association between food insecurity and certain mental health illnesses such as depression, poor sleep outcomes, and suicidal ideation in adults, as well as an association between maternal food insecurity and having a young child with special health care needs.

Today, I will not discuss the circumstances and conditions that result in food insecurity and very low food security nor the negative impacts. Because today we are not focused on prevention. Today, Hunger Solutions New York has been asked to present recommendations that will enable USDA nutrition assistance programs to more effectively reduce *very low food security at the household level*.

It is from all that we have learned that we present the following recommendations to *use existing USDA programs and funds to effectively reduce very low food security at the household level*

Supplemental Nutrition Assistance Program (SNAP) (formerly the Food Stamp Program): The nation's largest federally-funded nutrition assistance program must be strengthened and streamlined to maximize its impact on hunger. New efficiencies and the provision of adequate resources will enable the program to meet the needs of the increasing numbers of struggling individuals and families and preserve SNAP's ability to respond in times of economic downturn or disaster. Through USDA administrative changes, and other federal legislative/administrative opportunities, action should be taken to:

- 1) Maintain the core principals and integrity of SNAP:
 - Protect the entitlement status of SNAP and prevent conversion of the program to a block grant.
 - Provide sufficient funding to USDA and to states to effectively administer SNAP to meet the needs of hungry people and maintain program integrity.
 - Protect and continue to invest in SNAP outreach and education including non-English language outreach
 - Allow outreach funds from all the different benefit programs to be combined to ensure that very low food secure households learn about all the different benefit programs for which they are eligible and integrate outreach and education into

systems with which people with very low food security interact such as health care systems.

2) Streamline/Simplify Program:

- Ensure that recertification periods are no less than six months and eliminate reporting requirements between recertification periods.
- For households with little or no changes (as is often the case, for example, with seniors and people with disabilities), allow recertification without an interview.
- Align program eligibility requirements of all means-tested programs to allow for simplified and unified applications.

3) Increase access to SNAP by eligible individuals:

- Create "child only" cases for non-parental caregivers (e.g., grandparents raising grandchildren).
- Eliminate Able Bodied Adult Without Dependent (ABAWD) rules which cause the most food insecure adults to lose SNAP benefits.

4) Expand the number of people who are eligible to participate in SNAP:

- Eliminate the five-year bar for lawfully present noncitizens.
- Exclude adoption/kinship/foster care subsidies from being counted as income.

5) Maintain and increase the adequacy of benefits provided through SNAP:

- Improve the adequacy of monthly SNAP allotments by using USDA's Low Cost Food Plan in place of the Thrifty Food Plan when calculating SNAP benefit amounts
- Maintain state flexibility to provide a nominal LIHEAP benefit to the neediest low-income households, in order to maximize benefit allotments.
- Remove the cost neutral rule for states implementing a standard medical deduction.
- Introduce incentive programs at farmers' markets, grocery stores and other food vendors to increase buying power for fruits and vegetables, including fresh, frozen and canned produce as well as lightly processed food.
- Provide transitional SNAP benefits, similar to those provided in TANF, to households for whom an increase in income would reduce or eliminate their SNAP benefits.

Child Nutrition Programs: National School Lunch Program (NSLP), School Breakfast Program (SBP), Summer Food Service Program (SFSP), Supplemental Nutrition Program for Women, Infants, and Children (WIC), and Child and Adult Care Food Program (CACFP).

While not direct economic support programs, the indirect benefit of these programs to the financial resources of very low food secure households make them critical in reducing very low food security. In New York State, over 1.5 million students qualify for free and reduced-price school meals and 3 out of 4 public school teachers (76%) say students regularly come to school hungry.

Children in about 70 percent of low-income households with food-insecure children received free or reduced price school meals in 2010-11. Many households received assistance from

multiple programs, although about 31 percent reported receiving only free or reduced-price school meals.

Child Nutrition Reauthorization (CNR) offers a strategic and significant opportunity to strengthen child nutrition programs and ensure they are working effectively and efficiently to reach the most vulnerable, underserved groups of infants, children and youth and provide kids the healthy food they need, every day.

During re-authorization for these federally-funded child nutrition programs which expire in September, federal action can and should be taken to:

All Child Nutrition Programs:

- 1) Maintain the core principles and integrity of all child nutrition programs.
 - Provide sufficient funding to USDA for effective administration of child nutrition programs to meet the needs of hungry children.
- 2) Improve the nutritional quality of meals served, particularly through offering more fresh, frozen and canned fruits and vegetables, and whole grains.

In-School Meals Programs: Schools have a vital role to play in combating low food insecurity. Schools are a critical connection point for parents, families and community members.

Together, the National School Lunch and School Breakfast Programs meet the nutritional needs of children by providing more than half of the nutrients children need each day. However, breakfast programs most schools operate do not meet the need: only about half of the low-income students who rely on a free or reduced-price lunch at school also receive a school breakfast.

- 1) Maintain the core principles and integrity of In-School programs so that schools in low income neighborhoods with limited resources and funding can effectively implement National School Lunch and Breakfast Programs and meet the healthy meal patterns.
 - Increase the SBP and NSLP reimbursement rates for meals served to align with new meal pattern regulations that have caused increased costs for meal providers beyond the additional six cents they receive for following the regulations.
- 2) Increase access to child nutrition programs by low-income children.
 - Encourage the use of the Community Eligibility Provision (CEP) to provide universal free meals in qualifying schools.
 - Expand and increase participation in the School Breakfast Program
 - Provide start-up funds for school districts to start and implement breakfast after the bell programs (i.e. breakfast in the classroom, “grab and go” breakfast service, breakfast after first period) to remove barriers to student’s accessing school breakfast.
 - Require CEP schools to offer breakfast after the bell. CEP schools that offer breakfast after the bell have higher participation rates in school breakfast than CEP schools that do not offer breakfast after the bell.
 - Provide a higher per meal school breakfast reimbursement rate for schools adopting breakfast after the bell models to incentivizes districts to utilize

these methods to increase SBP participation and help with potential associated start-up costs, like additional labor, carts, or items for the classroom.

- Eliminate the reduced-price co-payment and allow free meals to students up to 185% of poverty, thereby removing a significant financial barrier to low-income families.
- Provide more adequate school breakfast funding to high -poverty schools.
 - Increase the “severe need” reimbursement received for each breakfast served to a low-income student by 10 cents.
 - Change the threshold required for schools to qualify for “severe need” funding from 40 percent to 30 percent.
- Require Title I Schools to offer the School Breakfast and National School Lunch Programs to ensure that their low income families have access to nutritious school meals and maximize federal education dollars targeted to high poverty schools.

3) Streamline/simplify child nutrition program administration:

- Improve direct certification to Increase the number of low-income children who are directly certified for free school meals by virtue of their participation in other means-tested programs. This improved cross-certification would do away with unnecessary applications and reduce burdens on schools and parents.
 - a. Require school district to directly certify all categorically eligible children.
 - b. Require states to incorporate TANF and FDPIR data into current data matching systems.
 - c. Require schools to formalize coordination with homeless liaisons, migrant education coordinators, Head Start program coordinators, and local foster care agencies.
 - d. Expand pilot program to directly certify children enrolled in Medicaid.
 - e. Extend categorical eligibility to children in military households that receive the Family Subsistence Supplemental Allowance for free meals and to be directly certified.

Out-of-School Meals Programs:

The SFSP is the largest federal child nutrition program operating during the summertime. All children ages 18 and younger (21 and younger for those with disabilities) may eat summer meals, where available. Thanks to the efforts of 317 sponsors in our state, children and teenagers were able to eat at more than 2,600 locations last July, including parks, pools playgrounds, recreation centers, schools, camps, faith-based/places of worship, housing authorities, libraries and other places in their community with significant concentrations of low-income children.

As USDA states, SFSP provides an opportunity to continue a child's physical and social development while providing nutritious meals during long vacation periods from school. It helps children return to school ready to learn.

The USDA’s Summer EBT demonstration pilot has shown clear results in reducing very low food security among children, the most severe form of childhood hunger. A rigorous evaluation indicated that Summer EBT for Children:

- Reduced the most severe form of childhood hunger by 33%
- Allowed children to eat more healthfully. Children in the demonstration project ate 13% more fruits and vegetables, 30% more whole grains and 10% more dairy
- Reached 30-75% of children eligible for free and reduced-price school meals

During regular school hours F/R meals go far in ensuring kids have access to nutritious meals – we know that SNAP benefits supplement a family’s food budget, but are not adequate. So many children and teens are in need of nutrition afterschool, on school holidays, and over weekends.

The CACFP’s At-risk Afterschool Snack and Supper component runs during the school year – after school, on weekends, and during school holiday breaks, providing nutritious meals and snacks to kids and teens free of charge.

According to a recent national survey conducted by Share Our Strength, the vast majority of parents (86%) reported that their children go home after school – unsupervised while parents are working - where they frequently eat a snack or meal prior to the family eating dinner.

Nearly 60% of parents reported having tight household budgets, making it difficult to provide food afterschool. A quarter of low-income parents surveyed worry that their children do not have enough to eat between school lunch and breakfast the following day. Parents are interested in free or affordable afterschool activities for their children – mostly tutoring, creative, or recreational activities -- and even more interested in afterschool programs at school that provide healthy food.

After-school providers who serve afterschool meals agree that meals and snacks attract children to out-of-school-time programs and help them stay active and engaged in activities while their parents are working. They also can help students get the nutritious meals they need in a safe, supervised location. For many kids, this is their only opportunity to access a healthy meal after the school day ends.

The afterschool meals component of CACFP is a new and exciting threshold for many of us – too few possible sponsors and sites such as schools, as well as nonprofits, low-income housing, YMCA programs, Parks&Rec, libraries – and more may be eligible to serve nutritious meals and snacks to kids and teens in afterschool enrichment and learning environments.

Out-of-School Time recommendations include:

- 1) Increase access to child nutrition programs by low-income children.
 - Improve the SFSP open-site eligibility threshold from areas where 50% of students qualify for free or reduced-price school meals to areas where 40% of students qualify for free or reduced-price school meals.
 - Increase flexibility and explore other options to provide nutrition support to children during out-of-school time in addition to the congregate feeding model. For example Summer EBT for Children, providing funding for transportation grants for innovative and mobile trucks for rural and other hard-to-reach

communities. Give funding priority for federal grants to programs that sponsor/operate all eligible child nutrition programs.

- Allow SFSP sponsors to serve three meals a day or two meals and a snack.
- Increase participation in CACFP
- Similar to the proposed "Summer EBT" an "Afterschool EBT" would provide equity and allow access to afterschool meals to very low food secure children in locations that do not provide afterschool meals.

2) Streamline/simplify child nutrition program administration.

- Allow local government agencies and private non-profit organizations to feed children year-round through the SFSP.

Senior Nutrition Programs: Seniors Farmers' Market Nutrition Program (SFMNP),

Congregate Meals and Home Delivered Meals

While SNAP helped to nourish over 565,000 older New Yorkers in September 2014, Senior Nutrition Programs authorized by the Older Americans Act and funded through the Administration on Aging serve a vital role in helping older adults maintain health and live in their communities. Congregate Meals and Home Delivered Meals are outside of the USDA's funding and administration, but as our population ages disproportionately with the baby boom generation, we would be remiss if we did not speak of these nutrition programs and how they reduce hunger and food insecurity among older individuals; a population at risk of very low food security.

These Nutrition Programs are targeted to adults age 60 and older who are in greatest social and economic need with particular attention to:

- low income older individuals,
- minority older individuals,
- older individuals in rural communities,
- older individuals with limited English proficiency, and
- older individuals at risk of institutional care

We hope that the Commission will include in its recommendations maintaining the core principle and integrity of senior nutrition programs and ensuring adequate funding levels.

As recommendations are implemented to reduce very low food security through USDA's nutrition assistance programs, benchmarks to measure success should include, at a minimum, poverty rates over time, low and very low food security rates over time, and participation rates in each of the nutrition assistance programs over time. USDA should continue its use of successful mechanisms for accountability that are currently in use.

A possible current gap in knowledge is a more objective measure of low and very low food insecurity. Currently measured by positive responses on a survey to questions indicating food insecurity from different perspectives, perhaps, since evidence points to financial resources as the strongest indicator of food security or lack thereof, financial resources could be used instead of the subjective survey that is currently used, especially in light of evidence that households with the lowest food expenditures tend to under-report food hardship.

Thank you for the opportunity to present our ideas and we wish you success in your efforts.

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