



1133 Nineteenth Street, NW, Suite 400, Washington, DC 20036

T: (202) 682-0100 F: (202) 289-6555 www.aphsa.org

Raquel Hatter, President

Tracy Wareing Evans, Executive Director

National Commission on Hunger

Hearing

How to Ensure Americans Have Access to Sufficient, Healthy Food

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Testimony by

American Public Human Services Association (APHS)

Tracy Wareing Evans, Executive Director

Contact: Larry Goolsby, (202) 682-0100, x239, lgoolsby@aphsa.org



Honorable Commission Members:

Thank you for the opportunity to submit this written testimony on behalf of the American Public Human Services Association (APHSA) in support of our oral testimony on Tuesday, July 14, 2015 at the Commission hearing in Washington, D.C.

The strength and health of families, adults, and communities rest on a broad continuum of widely available conditions and resources as well as individual and family capacities and abilities. These include the means to access proper nutrition, and federal nutrition programs play multiple and important roles in supporting this result. We see the Supplemental Nutrition Assistance Program (SNAP) as a key nutrition support in the array of health and human services that we and our colleagues in other agencies administer. As the largest and most widely available of these programs, SNAP has served to significantly alleviate hunger and poverty for many decades.

Our member agencies are responsible for directly implementing and managing SNAP and a broad array of other health and human services programs, including cash assistance and employment supports, child welfare services, services to the elderly and people with disabilities, and related services and supports to low-income and other populations. APHSA also represents human services program managers across the nation, including those who direct each state's SNAP office and who are organized within APHSA as the American Association of SNAP Directors (AASD).

A number of our members also either administer the Women, Infants and Children Program (WIC), the Children and Adult Care Food Program (CACFP), and sometimes other nutrition programs, or have close relationships to those agencies that do, such as state departments of health or education. They also work closely with the array of nonprofits and other community stakeholders that contribute to supporting the customers of human service agencies and our work of strengthening families and communities.

APHSA's Framework

I will begin with a few words about the framework through which our members see not only SNAP but the wider circle of health and human services programs, services, and partners that often have broad aims similar to SNAP's.

APHSA's *Pathways* initiative, our member-driven proposal for a more effective and outcome-focused human services system, calls for sustainable and meaningful outcomes for individuals and families focused on four impact areas: achieving gainful employment and independence; stronger families, adults, and communities; healthier families, adults, and communities; and sustained well-being of children and youth. We support these outcomes through prevention, early intervention, bridge supports, capacity-building, and sustainability of results. The foundations we require for this work include flexible financing, modern technology infrastructure, a prepared workforce, client engagement, and accountability for the outcomes we seek.

Our views are driven by the need to shape the future of human services programs so that they account for the many changes now taking place in our country – in the economy, social structures, demographics, communications, and



other major sectors that bear directly on our national success and well-being. These broad changes are challenging us to rapidly increase the effectiveness and value of our work. In partnership with communities across the nation, our agencies are already creatively generating solutions for the many needs and concerns in our field through focused leadership, path-breaking partnerships, and new answers to old problems.

We are optimistic about the unprecedented opportunities we have to maintain the best of our current systems while creating a new environment for improved, long-term outcomes for children and families. Some examples of these opportunities include exciting developments in breakthrough technologies, new forms of communication, fresh business process models, and alternative funding support. These new approaches, tools, and relationships are converging to *transform* our work into a system that creates community-wide change and supports meaningful and sustainable outcomes. These dramatic shifts are helping to lift individuals toward independence, add value to communities, strengthen families, and achieve more at less cost – positive changes that benefit us all.

SNAP's Impacts and Potential

APHSA and its members have recently completed a new statement addressing SNAP as part of the *Pathways* initiative. This SNAP statement identified the following core considerations:

- **Nutrition is a key support that is typically separate in structure and administration, yet plays a direct and vital role in building health and capacity.** While each of the federal nutrition programs has an important role, they could be far more effective if they are integrated into the larger framework of health and human service programs so they support and align with critically important health and wellness outcomes.
- **SNAP has contributed significantly to reducing need and to providing important bridge supports** for those affected by job loss and other setbacks. It can respond quickly to recessions, food price inflation, and the changing needs of individuals and job markets. SNAP's benefits flow through the existing retail food system and generate multiplier effects on the broader economy. SNAP's benefit structure must continue to be able to provide this kind of immediate, effective, and sustained response. SNAP is also a key element in preventing "heavier-touch" problems down the road in health, nutrition, family stability, and independence. As the traditional foundation of nutritional and bridge supports across the nation, it has enhanced the effectiveness of other programs with varying benefits and standards, such as Temporary Assistance for Needy Families.
- **While SNAP must retain its current strengths, it can and should become a far more impactful and efficient program.** First, SNAP must become much more effectively aligned with other programs such as those in the area of health. SNAP also must take far greater advantage of new technology and electronic data exchange that can speed the application process, avoid duplication of work for both participants and administrators, connect seamlessly with other programs, strengthen access, and further improve program integrity. SNAP can also substantially strengthen its ability to help participants find success in the workforce through, for example, expansion and refinement of the work engagement pilots authorized in the 2014 farm bill.
- **Any changes that would include block-granting SNAP must avoid problematic elements of other human services block grants** by retaining the current program's responsiveness as outlined above, including rapid adjustments for cost increases and caseload growth; a national floor for benefits; and alignment of state administrative match rates with other major human service programs. Any reductions in SNAP expenditures must be carefully assessed for their impacts on both recipients and the states' ability to meet their needs



properly, as well as the retail food economy. SNAP benefit or administrative match reductions could have a number of undesirable consequences, including diminishing agencies' ability to properly administer this very complex and labor-intensive program.

- **All health and human service programs must allow and support the most up-to-date and effective business practices in their administration**, making them a more seamless and efficient element of a person- and family-centered approach. A number of current SNAP laws, regulations, and administrative rulings prevent the program from taking full advantage of advances that would reduce administrative costs, improve customer service, and strengthen program impacts. Certain policies beyond SNAP also have similar impacts, such as those that keep SNAP and other programs from freely using important data bases that could improve administration and access. Similarly, states must have the option to implement horizontally integrated systems (particularly their information technology components) that align and streamline the eligibility and verification processes for SNAP, health, cash assistance, and other human services programs. Such integration will improve access, save administrative expense, improve program integrity, and maximize states' ability to take advantage of extended enhanced federal funding.

Food Insecurity: Current Program Considerations and Recommendations for Improved Access

Turning now to some of the Commission's specific questions, our members – as those who administer SNAP directly at the state and local levels – work closely with those experiencing food insecurity and similar challenges common to families affected by low income and inadequate capacity. Our agencies assess their circumstances, determine eligibility for SNAP benefits, make appropriate referrals to other areas of human services, and often connect with other nutrition programs and their administrators, such as WIC and school meals.

SNAP performs a significant role in addressing food insecurity for the majority of those participating in the program. Those who run short from month to month often have the resources of food banks to which they can turn. However, there are many ways SNAP could have greater reach and impact and fill gaps that remain, including by addressing program complexity, insufficient coordination with other programs, and inadequate use of modern technology. We have the following major recommendations for reducing very low food security.

- **Program simplification** – APHSA has for decades urged simplification of SNAP rules, and proper credit goes to Congress, several Administrations, and the program's stakeholders for reducing complexity in many areas. However, SNAP remains one of the most challenging assistance programs for customers to understand and for agencies to administer, and remains tied to eligibility and verification processes that are more difficult than those in most other major programs.
- **Lack of coordination and interoperability** – While SNAP certainly has some points of focus and service that are different from other human services programs, on the whole it serves many of the same people with the same broad aim of improving their well-being and capacity. By often functioning in isolation, SNAP misses many opportunities to interact with other programs and thus to enhance access and efficiency. One clear example is the inability to take full advantage of the new information systems being implemented for health care, which can connect to SNAP in limited ways but cannot bridge SNAP's differences in definitions of income and households and its approaches to interviewing and verification. Greater interoperability and alignment among these large systems would improve access by enhancing "single-portal" contact and reducing duplication in collecting and verifying case information.



Another rather obvious example cited by many of our members is the inability to even effectively align SNAP and WIC; they note that at the least, pilots should be allowed that test a common eligibility and benefit issuance process for certain households.

- **The “cliff effect”** – Among the most unfortunate results of multi-program disconnects is the so-called “cliff effect,” in which modest increases in income or in a given program’s benefits trigger significant reductions in other programs – a direct result of different approaches to eligibility rules and program philosophy. While SNAP has provisions that help ameliorate some of these concerns, on the whole it and other human services programs have far to go. Among other negative results, the cliff effect is often a significant disincentive to begin working or to increase hours and pay.
- **Modern customer interfaces** – Much of our population, of whatever income level, has long since made the transition to engaging government and other sectors electronically, through personal devices, and without the need for unreasonable paperwork and repetition of data already in the system. SNAP has begun making this transition, and indeed was a pioneer in changing to swipe card benefits nearly a decade and a half ago. But again, it has far to go in allowing simple electronic access, interoperability among related assistance programs, alternatives to face-to-face interviews, and use of the vast amount of electronic data now residing in government systems. Reducing these barriers could enhance single-portal access and eligibility, cut the time and effort to submit verification information, and help the many SNAP participants who must work during normal office hours.
- **Interviews** – The SNAP statute does not address the subject of face-to-face interviews but regulations written in a different era continue to broadly require them. This stands in contrast to other large programs, such as medical assistance, whose requirements are far more flexible and that make far greater use of electronic or phone contacts. With respect to both program alignment and to SNAP alone, states should be allowed the option to utilize face-to-face interviews for SNAP only as necessary to make accurate determinations, maintain program integrity, and assess broader customer concerns and needs.
- **Certification and recertification policy** – SNAP certification policy should also be simplified and aligned with other programs to allow substantial reductions in the current complex and error-prone reporting, processing, and deadline requirements. Certification periods should be lengthened for households whose circumstances are not likely to change, including a state option of up to three to four years for certain stable categories such as those consisting entirely of elderly or disabled members receiving Supplemental Security Income or Medicare Savings Program benefits. The greater access benefits of this approach would be particularly helpful for these groups.
- **Removing barriers to the elderly and other stable groups** – The Combined Application Project (CAP) option allows greatly streamlined SNAP eligibility and participation by Supplemental Security Income recipients, essentially requiring only an additional test for the exact amount of benefits. This is accomplished through linkages between the Social Security Administration and state SNAP IT systems, and is credited with greatly simplifying administration and in improving access for this population – that is, in states where it does exist. Each state must be individually evaluated for CAP participation, and certain models require SSA agreement. This option has been under way since the late 1990s, yet in all this time, only 15 states had been brought into this very effective system as of 2013. We are far overdue to make this a standard national feature of SNAP. Similar arrangements should be promptly tested and implemented for other groups whose household composition and income are likely to be stable, including such approaches as provisional eligibility.



- **SNAP’s role in supporting work and building capacity** – Support for entering the workforce and retaining gainful employment is a key goal for our agencies and a critical activity that can help move more individuals and families out of poverty. SNAP’s role in this goal could be greatly strengthened if the rules and funding for the SNAP Employment & Training program meshed more seamlessly with other work support efforts and could more easily be made part of a comprehensive employment support effort. The current E&T pilots should shed important light on how SNAP can advance in this critical area, and clearly beneficial impacts from these pilots should be implemented even *before* the pilots have concluded. Additional, similar pilots that can evaluate other strategies to build individual and community capacity should be promptly developed and tested.

Accountability, Program Integrity, and Program Data

APHSA and its members fully support the accountability of human services programs for results that are significant and sustainable, and that return proper value for the public’s investment. SNAP is without question one of the most highly regulated and strictly overseen programs when it comes to such metrics as benefits and timeliness, and this basic emphasis should remain in place. However, both these basics and other equally important program results could be part of a broader and more balanced approach to assessing what SNAP accomplishes. Some ways to accomplish this include the following.

- **Allow states to test alternative success outcomes in lieu of certain current accountability requirements** – There are potentially several ways to evaluate the success of a broader approach within SNAP to documenting progress toward less food insecurity, greater engagement with the workforce, and a greater degree of overall capacity and independence. For example, several of our member agencies are now testing a Self-Sufficiency Index through new means of building evidence and charting progress. Demonstration projects testing SNAP as a strong factor in achieving such *outcomes* should be implemented, with some of the funding and procedures now devoted to *output* compliance repurposed for these broader and far more impactful goals.
- **Testing and implementing other successful innovations** – Modernizing SNAP must include accelerated development of innovative alternatives that improve the program’s impacts and administration, followed by rapid evaluation and prompt implementation of successful improvements. The Employment & Training pilots now under way should be a model for numerous other pilots covering such major program aspects as improvements in nutrition, overall family well-being, and independence; verification and program integrity; and new blended and braided funding models, including partnerships with other programs and sectors. Another example could be pilots that incorporate use of the Modified Adjusted Gross Income (MAGI) and eligibility decisions from health programs to initiate and complete most of the SNAP eligibility process.
- **Food choice** – There is a great deal of interest in, and concern about, food choices that SNAP participants make. Many of our members have for years called for greater attention to the major role SNAP plays in the national problems of inadequate nutritional intake, obesity, early-onset diabetes, and other food-based concerns. Several innovative tests of food choice incentives have been held to assess whether wiser food choices result – including the USDA-funded Healthy Incentives Pilot in Massachusetts and several public-private efforts in Michigan and Minnesota – and more such pilots should be carried out on a frequent basis. Our members believe that proposals to restrict foods that SNAP recipients are allowed to choose have many administrative and policy complications, and are less likely to add to our base of useful knowledge.



- **Program integrity** – As a large and highly visible program, SNAP is properly held to high standards of program integrity and accuracy. SNAP’s program integrity could be further enhanced through additional resources to monitor and control trafficking. States should also have more options to identify and participate in modern eligibility and verification innovations, especially when their payment accuracy rates are already high; while SNAP’s low error rate is remarkable by any standard, achieving that result requires costly and time-consuming demands on staff, training, quality control oversight, and analog-era documentation from customers and employers.

The current SNAP bonus incentive funding for high state performance should not only be retained but ideally expanded; these positive incentives, although very modest in amount, have helped numerous states improve their SNAP program quality and customer service.

- **Knowledge gaps** – Studies of SNAP have generated a vast quantity of data over the years, but too little of it extends beyond program demographics, quality control metrics, and participation numbers. This program – together with many other large human services programs – badly needs more information on how it does, or could, contribute to the sustainable well-being outcomes our members have identified as central to a properly oriented human services system. Rapid and extensive deployment of the kinds of innovation demonstrations cited above could go far toward narrowing this gap, particularly in combination with rapid cycle evaluation results that can be reported and put to use while waiting for longer-term evaluation conclusions.

