

Jeff Kleen
Public Policy Advocate
Oregon Food Bank
7900 NE 33rd Dr.
Portland, OR 97211
jkleen@oregonfoodbank.org
(971) 313-8305

Thank you for the opportunity to make recommendations for the National Commission on Hunger. Oregon Food Bank's recommendations center around federal nutrition programs that are critical to the effort of reducing hunger in the United States: the Supplemental Nutrition Assistance Program (SNAP), The Emergency Food Assistance Program (TEFAP) and child nutrition programs.

SNAP

SNAP continues to be very important in our state, with almost 1 in 5 Oregonians relying on the program to help buy food. But our surveys show repeatedly that SNAP benefits are insufficient to make it through the month – typically lasting only two to three weeks. Therefore our strongest recommendation is to increase SNAP benefits by moving benefit determination from the Thrifty Food Plan to the Low-Cost Meal Plan. Alternative steps would be to form an advisory group for the Thrifty Food Plan to be studied, redefined, and re-budgeted as an adequate plan with a higher SNAP allotment amount to purchase it, or an advisory group to update federal poverty levels.

American Indians would benefit from allowing households to receive food from the Food Distribution on Indian Reservations (FDPIR) and SNAP benefits at the same time.

Oregon has been one of the states running the Summer Electronic Benefit Transfer for Children (SEBTC). SEBTC eliminated Very Low Food Security for about one-fifth of the children who would otherwise have experienced it. We recommend continuation of this pilot as a way to address increased summer hunger resulting from lost school and after-school meals and snacks provided during the academic year.

We are concerned about the nutrition outcomes for SNAP participants and feel that USDA could take several steps to increase the purchases of healthful foods – including allowing retailers to issue coupons specifically to SNAP participants for fruit and vegetables, specify amounts of SNAP benefits that go toward the purchase of healthful foods, or implementing a two-track system for sugar-sweetened beverages (SSB) wherein SNAP participants can choose a higher benefit level with purchasing restrictions on SSB or a lower, unrestricted benefit level. USDA can also inform the debate over SNAP purchases by releasing aggregated data on SNAP benefit purchases and making public data on SNAP purchases by broad category and comparing them to purchases by “average” Americans.

USDA can also help de-stigmatize SNAP participants by better differentiating between retailer and participant fraud. Further, USDA should better inform and involve state SNAP programs in fraud reduction, which have limited knowledge of retailer fraud.

TEFAP

TEFAP remains the largest single source of food for Oregon Food Bank, making up almost 20 percent of our food supply. Our recommendations around TEFAP focus on mandatory food purchases, storage and distribution funds, and Section 32 bonus purchases.

Above all, USDA should see TEFAP as an anti-hunger program in addition to an agricultural support program. Purchases should be driven by demand for food assistance in addition to support for the agricultural sector. We recommend USDA creates a retail purchases advisory board for input on timing and type of purchases. Further, we recommend a return to a quarterly rather than the current annual ordering system. The quarterly system allowed food banks to schedule purchases better and manage purchases, funds, and warehouse space more effectively. TEFAP can be further improved by ensuring that purchased foods are in retail-size packaging. This is increasingly important because the number of prepared-meal sites has decreased as organizations shift to shopping-style pantries.

We also recommend aligning TEFAP and CSFP regulations (using TEFAP regulations), and examining state TEFAP distribution models to identify best practices for equitable distribution.

Section 32 bonus buys are another key area for strengthening. Most importantly, the secretary of agriculture should exercise greater authority for more frequent bonus buys (and not revert dollars back to U.S. Treasury). Alternatively, the amount and purchase frequency of bonus purchases could be indexed to poverty or unemployment rates. Similar to mandatory food purchases, an advisory board should provide input on which bonus buys to make (some buys are less suitable for food banks and USDA should pay less for these products). This would help avoid the volatility of purchases, make bonus purchases more predictable, spread out delivery, prevent product from being “one-dimensional” – a lot of one product at the same time, and bring in more retail size packaging (i.e. 10-pound packages are too large).

Several steps can be taken to increase the effectiveness of TEFAP storage and distribution funds. Most importantly, they should receive the fully authorized annual amount of \$100 million and this amount should be made mandatory rather than subject to the whims of the annual appropriations process. It simply isn't smart business practice to have these funds be unpredictable. This amount should also be indexed for fuel/utility/wage inflation. It is also worth considering if the approved use of the funds is too restrictive. Perhaps it should also include capacity-building like food resource development staff. Lastly, the allocation formula should factor in the geographic size of a food bank's service area.

Child nutrition programs

We recommend several changes to the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) to address increased access to healthy foods in all communities by reducing administrative burdens and roadblocks. First, align the WIC-approved food list with the Farmers Market Nutrition Program food list to reduce shopper and farmer confusion, specifically edible blossoms and herbs.

Second, save money by allowing for streamlined contracting with retail grocery stores that have an ownership change at the corporate level. Currently, when ownership changes a state must complete an entire new-store contracting process including an on-site monitoring visit and staff training. Frequently these ownership changes are invisible at the local level with no management or staff changes.

Next, redefine “interactive” training of retail grocery and pharmacy vendors to include e-learning. Lastly, for EBT redemptions at farmers markets and farm stands, allow WIC EBT transactions to be tracked at the market level rather than the current requirement for one-to-one reconciliation to the farmer level. This is the current practice in SNAP EBT and is a significant barrier for WIC EBT.

School meals can be improved by providing a higher rate of school meal reimbursement, taking steps to eliminate food waste for school meal settings, eliminating the reduced-price category (or most ideally, providing universal free breakfast and/or lunch), and encouraging more schools to operate breakfast – whether cafeteria style, grab ‘n go, or breakfast after the bell.

Our recommendations for summer meals include streamlining the Summer Food Service Program (SFSP) for community-based providers by aligning regulations with those of the Child and Adult Care Food Program (CACFP) and waiving the congregate requirement to better meet local needs and address transportation issues among people with low incomes – particularly in rural areas.

We feel it is also worth considering why there are so many programs. Programs could be combined into school-based and out-of-school to streamline both administration and participation in the programs and achieve potential cost savings.

Miscellaneous

Additionally, on a variety of topics, we recommend USDA establishes a periodic (i.e. 10-year) review of the National Commission on Hunger’s work.

Related to community food systems, our CFS team recommends SNAP incentives focused on local food, guarding against the diversion of CFS funds for traditional food banking, a sincere discussion of the limitations of traditional food banking, and scale appropriate regulation for local/regional food processing.

Please contact me if you would like more details or have any questions regarding these recommendations.