

**Testimony to National Commission on Hunger**  
**Patricia Baker, Senior Policy Analyst, Massachusetts Law Reform Institute**  
Portland, ME July 30, 2015

Thank you for inviting the Massachusetts Law Reform Institute (MLRI) to provide written comments to the National Commission on Hunger with respect to poverty and food insecurity in the United States. I am a senior policy analyst with MLRI and Chair of the Massachusetts Food SNAP Coalition. MLRI is a statewide advocacy and support center, founded in 1968. Our mission is to represent low-income people, elders, and disabled people working for basic human needs, to defend against policies and actions that marginalize people living in poverty, and to address the root causes of poverty, remove barriers to opportunity, and create a path to economic stability and mobility for low-income individuals, families and communities.

The Massachusetts SNAP Coalition was founded in 2002 by MLRI and Rosie's Place with the goal of improving the state's then woefully low participation in the federal Food Stamp/SNAP program. Since its formation, the Coalition has worked to identify and assist in implementing policies that would remove unnecessary access barriers for seniors, persons with disabilities, children and working families. The SNAP Coalition, chaired by MLRI, includes food pantries and food banks, health care and elder services organizations, faith-based organizations, shelters, job training and community action programs, legal services organizations and SNAP recipients. Many are engaged in SNAP outreach or SNAP E&T services. We meet monthly with representatives of the state SNAP agency and the USDA Food and Nutrition Service where we discuss state and federal policies that impact federal nutrition programs, research on food insecurity, as well as identify systemic or access barriers to federal nutrition programs and make policy recommendations to improve access and reduce administrative inefficiencies.

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The Supplemental Nutrition Assistance Program (SNAP) is the nation's first defense against hunger in the United States and in the Commonwealth of Massachusetts. The SNAP program currently serves 767,000 low income Massachusetts residents,<sup>1</sup> 1 in 8 residents in the Commonwealth. Over 42% of our SNAP households include a senior or person with disability, 61% are families with children or pregnant women.<sup>2</sup> Only 15% of the state's SNAP population receives cash assistance from TANF or the state General Assistance program. Roughly 7% of SNAP households in Massachusetts include a veteran.<sup>3</sup> Based on USDA data for FFY 2014, the average SNAP benefit per household member is currently \$122/month or \$1.36 per meal. In comparing the state's MassHealth (Medicaid) recipient population with SNAP receipt, approximately 400K low income MA residents receive

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<sup>1</sup> Massachusetts Department of Transitional Assistance, SNAP participation data as of April 2015.

<sup>2</sup> USDA SNAP caseload data, FFY 2013.

<sup>3</sup> Center for Budget and Policy Memo, *SNAP Helps Roughly 17 Million Veterans including Thousands in Every State*, November 11, 2014

federally funded MassHealth but not federal SNAP benefits, many of which are likely SNAP eligible.<sup>4</sup>

National research confirms that SNAP is one of the key federal nutrition programs that has been instrumental in reducing food insecurity and malnutrition within the United States. We applaud the work of Commission Member Dr. Deborah Frank and the Boston-based Children's Health Watch team in tracking the impact of SNAP on reducing food insecurity among low income children in the City of Boston and throughout the nation.<sup>5</sup> SNAP has a clear track record of reducing very low food insecurity and improving health outcomes for families with children, pregnant women, parents, seniors, persons with disabilities and all eligible households. Nonetheless, food insecurity persists in the Commonwealth.

While Massachusetts is one of the nation's top IT and health industry hubs, as well as a prime vacation destination like most of New England, the Commonwealth has experienced its share of economic upheaval for its most vulnerable residents, Massachusetts presents an excellent glimpse into the challenges of serving an economically and regionally diverse population with critical federal nutrition benefits and why securing and ensuring a strong nutrition safety net is critical:

- Based on the most recent US Census data for 2013, 11.4% of the MA population lived under 100% of the federal poverty level.<sup>6</sup>
- A recently released Gallup Healthways Poll documented a persistence of food insecurity in MA of nearly 15% between 2012 and 2014.<sup>7</sup> The Gallup Healthways Poll also documents an alarming increase in food insecurity for the Worcester Metropolitan Statistical Area (MSA) from 16.6% in 2012 to 19.6% in 2014, ranking Worcester with the 33<sup>rd</sup> worst food insecurity rate out of 100 top MSAs in the nation.<sup>8</sup>
- A Kaiser Family Foundation analysis of U.S. Census and income data highlights that Massachusetts is one of 9 states where the share of seniors living in poverty Supplemental Poverty Measure (SPM) is twice as large as the official poverty

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<sup>4</sup> Most recent Medicaid data for comparison is published by Kaiser Family Foundation showing Medicaid (MassHealth) caseload of 1.3M compared with SNAP caseload of 877K for December 2013, identifying possible "gap" of 400K potentially SNAP eligible. USDA SNAP participation data for December 2013; Kaiser Family Foundation Medicaid data, December 2013.

<sup>5</sup> Children's Health Watch, The SNAP Vaccine: Boosting Children's Health, February 2012

<sup>6</sup> US Census States; MA population below poverty 2009-2013

<sup>7</sup> [How Hungry is America?](#) Gallup Healthways Wellbeing Index, 2014 data on food hardship for the US, all states and 100 of the country's largest Metropolitan Statistical Areas (MSAs), published by Food Research Action Center.

<sup>8</sup> Gallup Healthways Wellbeing Index. In 2014, the national food hardship rate was 17.2 percent in 2014, with Massachusetts rate at 14.9 percent. The Worcester MSA exceeded the national average at 19.6 percent in 2014. Out of the top 100 MSA, the Worcester MSA's ranking on food hardship in 2014 sank from 58<sup>th</sup> in 2012 to 33<sup>rd</sup> in 2014, within the top third of the MSAs with the most severe food hardship. Massachusetts currently ranks 33 of 50 states, with 14.9 percent reporting they were unable to afford enough food in 2014, a slight -.1% drop from 15.0% in 2012.

measure, e.g. 16% of seniors in the state fell under the Supplemental Poverty Measure versus 8% under the official poverty measure.<sup>9</sup>

- Unemployment on Cape Cod and Western Massachusetts spikes in the “off-season” months – more than half of a calendar year – when revenue from seasonal tourism drops off. The “wintertime” unemployment rate is typically double the state unemployment rate.<sup>10</sup>
- Massachusetts fishing community continues to experienced economic significant hardship from National Oceanic and Atmospheric Administration (NOAA) restrictions on fishing in George’s Bank, Gulf of Maine and key fishing grounds, an industry that was the backbone of the local economy in Gloucester and New Bedford.<sup>11</sup>
- Seasonal farming in Western Massachusetts leaves thousands of our rural families without revenue, and food, in the winter months according to the New England Farmworkers Council and Massachusetts Farm Bureau Federation. Many are families who are also stranded by lack of affordable or public transportation.
- The cost of living in Massachusetts places economic strain on all families, but especially seniors, persons with disabilities and low wage workers. Even at minimum wage earnings, now \$9/hour in Massachusetts, a family of 3 that includes one wage earner working 40 hours/week and two children earns gross income of \$18,720 – which is less than 75% of the federal poverty line before taxes or costs of earning the wages.<sup>12</sup>
- Massachusetts has suffered its share of natural disasters in the past few years requiring federal and/or state’s emergency response as a result of multiple storms including the Western Massachusetts tornadoes of 2011, Hurricane Sandy in January of 2014, Winter Storm Juno in 2015, and many more. Following a number of these storms, impacted areas of the state qualified for Disaster SNAP benefits based on a Presidential Declaration and/or time extensions to provide replacement benefits to existing SNAP recipients whose food loss was caused by extended power outages. At all times, SNAP provided the key ingredient for families to maintain important nutrition benefits during unexpected turbulence.

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<sup>9</sup> Kaiser Family Foundation Poverty Among Seniors Updated Analysis, June 10, 2015

<http://kff.org/medicare/issue-brief/poverty-among-seniors-an-updated-analysis-of-national-and-state-level-poverty-rates-under-the-official-and-supplemental-poverty-measures/>

<sup>10</sup> Bureau of Labor Statistics New England Region/Unemployment Cape Cod and the Islands, January 2015,

[http://www.bls.gov/regions/new-england/news-release/unemployment\\_capecod.htm](http://www.bls.gov/regions/new-england/news-release/unemployment_capecod.htm)

<sup>11</sup> Boston Globe, [Future for Fisherman Bleak under Cod Ban](#), Nov. 12, 2014

<sup>12</sup> \$9/hr x 40 hrs/week is \$360/week or \$18,700/year.

Why are these data points important for the Commission? Because SNAP serves a diverse population in the Commonwealth whose needs for a strong safety net, a nutrition safety net, vary based on the availability of employment, age, the age or disability of our residents, unanticipated personal and statewide crises and more. The SNAP program needs to remain strong and flexible to the ever changing needs of the nation, even as low income families slowly dig their way out of the Great Recession. Indeed, during the 2012 Congressional Farm Bill debates, both U.S Senator John Kerry and U.S. Senator Scott joined forces in supporting an amendment against cutting the SNAP program. Senator Brown declared: *“There are many families throughout the commonwealth and the nation who depend on food stamps to get by in today's tough economy and it is important that this service is available for them,”* Brown said in a statement. *“I strongly support this amendment to keep the food stamp program intact for low income families.”*<sup>13</sup> The SNAP program has long been recognized as vital to our low income communities in the Commonwealth and to the nation.

Toward that end, MLRI offers the following recommendations to the National Commission on Hunger which we believe will address the nutritional needs of low and very low food insecure households in the nation.

First and for most, we urge the Commission to include recommendations to Congress that address the root causes of poverty by:

- supporting an increase the minimum wage and tie it to inflation;
- expanding subsidized employment and training program funding and access to higher education with robust financial aid;
- promoting policies that connect families with more safety net programs (such as subsidized child care and housing) to minimize the “cliff” effect of increased income as families become more economically stable;
- and updating the federal poverty level formula from the 1960’s to recognize current costs of housing, utilities, transportation, health care as well as food.

With respect to the federal SNAP, we urge the Commission to include the following recommendations:

- Strengthen the SNAP program by recommending to Congress to adjust the dollar value of the SNAP program from the Thrifty Food Plan to the Low Cost Meal Plan. The current benefit level is woefully insufficient to address the basic food needs of the nation’s low income residents.
- Lift the SNAP “shelter deduction cap” for all SNAP households. The current cap on shelter deductions artificially limits the actual shelter costs incurred by households, especially in high shelter/high utility cost states across New England.
- Support and expand SNAP Outreach to direct states to reach un-served low income households, including data-driven efforts that target SNAP to low income individuals and families receiving Supplemental Security Income, Medicare Low Income Subsidies, Medicaid, National School Lunch Program reduced price meals, Earned Income Tax Credit, Income-Eligible Child Care and Fuel Assistance. In many

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<sup>13</sup> Masslive.com [June 11, 2014](#), Sen. Scott Brown co-sponsors amendment to save SNAP benefits from cuts proposed in Farm Bill.

cases, these low income households have already verified their financial eligibility for other programs, information already verified by the administering agencies that could provide the basis for efficient SNAP enrollment and targeted SNAP outreach. For states with separate state agencies administering SNAP and Medicaid/healthcare in “silos”, this could be a critical step toward integrated eligibility and administrative efficiencies for key programs.

- Require USDA to revise current SNAP policies that harm low income veterans and military families. This includes amending federal policy to exclude from countable income in SNAP the Base Housing Allowance (BAH) provided to military families to offset housing costs and allowing veterans with pending VA disability determinations to be considered “disabled” for purposes of SNAP eligibility (which disability status allows the veteran to claim unreimbursed medical expenses and uncapped shelter costs as well as remove the gross income test.)
- Promote technology and systems changes that reduce “churning” of SNAP eligibility to keep low income households connected with their SNAP benefits until they become financially ineligible. This could include on-line renewals, text/ VM reminders for SNAP recertifications and interviews, waiver of interviews for key populations. This should also include developing standardized metrics to measure high rates of SNAP “churning” of benefits with fiscal incentives for states that achieve high retention and reduced administrative costs.
- Provide Summer EBT benefits for children in summer months when children out of school and not accessing National School Lunch program.

Thank you for accepting this testimony.