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FARM BILL RECOMMENDATIONS

ALLIANCE TO END HUNGER
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About Alliance to End Hunger

The Alliance to End Hunger's vision is to end hunger in the United States and around the world in this generation. To achieve this, the Alliance unites diverse sectors to address today's hunger and malnutrition needs and to solve the root causes of hunger at home and abroad. We are a diverse coalition of over 100 members including corporations, non-profits, universities, individuals, agriculture organizations, healthcare providers, foundations and faith-based organizations – all working together in the fight against hunger and malnutrition. See a list of our [member organizations](#) at the end of this document.

The Alliance develops innovative partnerships between its members; political commitment from policymakers; and connections among groups working to end hunger domestically and internationally. In the U.S., we partner with over 70 organizations in 33 states working end local hunger through the Hunger Free Communities Network™.

Conflict, climate shocks, the ongoing impacts of COVID-19, and the rising costs of living have resulted in an unprecedented global food and nutrition crisis. A record 349 million people across 79 countries are facing acute food insecurity – up from 287 million in 2021. In the United States, 33.8 million are impacted by food insecurity. Congress has a critical opportunity this year to alleviate hunger through the reauthorization of the Farm Bill.

Alliance member organizations developed these recommendations through an extensive consensus building process.

Our Vision for the Farm Bill

The past few years have severely impacted our food systems and have tried our safety net and emergency response to hunger and malnutrition in the United States and around the world. Our community must approach the Farm Bill as fundamental to ending hunger and malnutrition, building a sustainable food system from farm to plate, and ensuring equitable outcomes for people and communities.

COVID-19 radically changed our understanding of food systems and hunger in the United States, but it also showcased the incredible success that nutrition and other safety net programs can have in meeting crises head-on. The Supplemental Nutrition Assistance Program (SNAP), The Emergency Food Assistance Program (TEFAP) and other pandemic-related measures successfully limited increases in food insecurity across the U.S. However, as pandemic-era supports come to an end, household budgets are still feeling the strain of high food prices and inflation. Further, food systems – from farming, to distribution, to retail, are still recovering.

Internationally, all corners of the earth were disrupted by the same effects of COVID as the United States, with similar disruptions to food systems and government responses to food insecurity. Even before the pandemic, rates of hunger were climbing due to violent conflict, political and economic upheaval, and shocks from drought, floods, typhoons, and other weather-related events. The Farm Bill contains provisions that have been proven to save lives and improve livelihoods. It is imperative that the emergency response funding for Food for Peace Title II be defended, and the development funds under the program be modernized and expanded. Nutrition support for children and communities is also critical. The McGovern-Dole Food for Education Program not only helps schools in poor communities,

but also empowers families to ensure their girls can receive an education. Now, with the war in Ukraine complicating food and nutrition insecurity across the globe, it is crucial that we sufficiently defend and expand every tool in our toolkit.

The past few years have displayed both the challenges we are facing and the opportunities we can seize. If we approach the Farm Bill as an anti-hunger bill, as a nutrition bill, and as a bill fighting for the basic needs of all, this Congress can achieve phenomenal progress towards eliminating hunger and poverty everywhere.

Domestic Programs

Supplemental Nutrition Assistance Program (SNAP)

SNAP provides a monthly benefit to supplement the food budgets of the country's lowest income households. The majority (over 80%) of SNAP households include children, the elderly or people with disabilities. In FY2022, 41.2 million people participated in SNAP with an average monthly benefit per person of \$230.01.^{i,ii} SNAP has been shown to promote long-term positive health and economic outcomes, especially among those who receive SNAP during childhood.ⁱⁱⁱ There is strong evidence that SNAP is immensely effective in alleviating food insecurity by helping households afford adequate and nutritious foods.

By redeeming their benefits at approved retailers, SNAP recipients help to stimulate the economy. According to USDA, SNAP "provides assistance to more low-income households during an economic downturn or recession and to fewer households during an economic expansion, serving as an automatic stabilizer to the economy." Further, USDA estimates SNAP spending increases Gross Domestic Product (GDP) by a multiplier of 1.54. Meaning, an increase of \$1 billion in SNAP benefits in a slowing economy increases GDP by \$1.54 billion and supports 13,560 additional jobs, including nearly 500 agricultural jobs.^{iv}

Maintain SNAP's Effectiveness and Reach

Maintain increased SNAP benefits resulting from USDA's reevaluation of the Thrifty Food Plan

The Thrifty Food Plan is USDA's estimated cost of groceries needed to provide a healthy, economical diet for a family of four. It is the benchmark used to calculate annual SNAP benefits.^v In the 2018 Farm Bill, Congress directed USDA to update the Thrifty Food Plan taking into account current food prices, consumption patterns, food composition data and the latest dietary guidance.^{vi} The resulting update raised maximum SNAP benefits by 21 percent and the average SNAP benefit from about \$4.25 per person per day to \$5.45.^{vii}

The Thrifty Food Plan update, the first such reevaluation in the basis for the SNAP benefit in 45 years, has lifted an estimated 2.4 million SNAP beneficiaries out of poverty, including more than 1 million children.^{viii} It reduces the severity of poverty for another estimated 20.5 million people, including 6.2 million children.^{ix} Moreover, the update brought the Thrifty Food Plan in line with dietary guidelines and better reflects the food choices commonly consumed by U.S. households, while still requiring recipients to economize their selections.^x

Preserve broad based categorical eligibility (BBCE)

Federal law provides two avenues to qualify for SNAP eligibility.^{xi} The first is through meeting SNAP's federal eligibility requirements.^{xii} The second is through BBCE, which confers automatic SNAP eligibility

to individuals eligible for other federal low-income aid programs.^{xiii} BBCE allows states to expand SNAP eligibility by raising the program's limit for gross income from 130 percent to 200 percent of the federal poverty guidelines and by waiving the program's typical asset tests.^{xiv}

BBCE provides flexibility to states to cover additional food insecure households through SNAP and streamline their participation. Additionally, BBCE allows states to lift their SNAP gross income threshold and reduce benefits gradually so working families are not deterred from seeking job promotions out of fear that a small earnings increase will threaten their SNAP benefits—the “cliff effect.”^{xv} It also allows states to waive asset thresholds so beneficiaries can begin to save and build long-term financial stability.^{xvi} Moreover, BBCE simplifies the SNAP application process and lowers “churn,” which occurs when SNAP households stop participating in SNAP and then reapply soon after, creating additional labor for state workers and benefit gaps for SNAP beneficiaries.^{xvii} In the past, since children in households that receive SNAP are categorically eligible for free school meals, USDA has warned that eliminating BBCE would result in more than 500,000 children losing access to school meals.^{xviii}

Protect food choice options for SNAP recipients

Currently, SNAP benefits may be used to purchase most food and drink products except for alcohol and prepared foods.^{xix} As a program that is intended to supplement food budgets, SNAP recipients need more choices to meet their dietary needs, not less. While most Americans are falling short eating according to the Dietary Guidelines for Americans^{xx}, research indicates that SNAP and non-SNAP households have similar food purchase patterns.^{xxi} In addition many low-income families live in food swamps and food deserts making fresh vegetables and produces out of reach for many families. Therefore, efforts to improve nutritional choices should be broad-based, address root causes and not limited to SNAP recipients because of biased assumptions about their eating patterns.

Prevent Unnecessary Loss of SNAP Benefits

Improve EBT Card Technology to avoid benefits theft

The Consolidated Appropriations Act, 2023 (Omnibus) addressed increased reports of SNAP benefits theft through EBT card skimming^{xxii} in two major ways. First, it directed the USDA to issue guidance to states about prevention, including effective security options for EBT card technology, and directed states to implement these security features by December 2023. Second, it allows federal funds to be used for states to reimburse skimming victims.

To avoid future skimming schemes, the technology in EBT cards should be upgraded to chips rather than magnetic strips that are easier to clone. Additionally, the consumer protections available to credit and debit card holders should be extended to EBT card holders.

Eliminate the three-month time limit on SNAP participation for able-bodied adults without dependents (ABAWDs)

Currently, adults ages 18-49, who are subject to the general work requirements and who do not have dependents, and are not pregnant, are considered ABAWDs. ABAWDs cannot receive SNAP benefits for more than three months within a three-year period unless the individual meets the ABAWD work requirement or is otherwise exempt. State agencies have some flexibility in applying this rule.^{xxiii} This policy prevents people from receiving food assistance just when they need it most. In addition, it disproportionately impacts Black, Indigenous and people of color who are more likely to face labor market discrimination and have higher rates of unemployment.

All eligible individuals should be able to access adequate nutrition through SNAP regardless of their ability to obtain employment. Research indicates that the time limit decreases SNAP participation among individuals but does not substantially increase work or earnings.^{xxiv} This punitive practice should be ended. Further, no additional time limits should be imposed on SNAP recipients. SNAP benefits will end at the completion of the certification period, unless the recipient can demonstrate continuing compliance with eligibility rules. The Improving Access to Nutrition Act of 2023 would eliminate three-month time limits on SNAP eligibility for certain working-age adults who cannot document sufficient hours of work, advancing this goal.

Eliminate the “benefits cliff”

A benefits cliff is created when a small increase in income or assets causes a household to exceed eligibility thresholds, lose all SNAP benefits, and experience an overall decrease in total income. The amount of SNAP benefits a household receives is partially determined using a sliding scale. As a household’s *net income* increases, the amount of benefits received by that household decreases. However, when the amount of a household’s *gross income* or *total assets* increases by even \$1 over the program limits, the household becomes ineligible and loses all SNAP benefits. This often results in a greater overall loss than the increase in income. When a household experiences the benefits cliff, the minimal increase they receive in income may not be enough to offset the loss of public benefits.^{xxv} Thus, accepting modest wage increases may make households *worse off* financially and deter them from saving money to help prevent future financial hardships.

This negative impact disproportionately impacts low-income families of color, particularly those led by single women and those with African American or Latino children.^{xxvi} Further, if a household loses SNAP benefits, they may experience an extended benefits cliff by losing access to other public benefits such as utility rate discounts and automatic eligibility for free school meals for children within the household.^{xxvii} A mechanism should be in place to step down SNAP benefits commensurate with increases in income when households reach the program’s income limits.

Expand SNAP’s Purchasing Power

Provide access to hot and prepared foods at SNAP retailers

SNAP benefits currently cannot be used to purchase hot and prepared foods in supermarkets.^{xxviii} This arbitrary restriction limits options for additional nutritious foods, is based on unrealistic expectations of families’ cooking time and excludes options for those without traditional cooking facilities. The previously introduced, SNAP PLUS Act of 2021 would permanently eliminate this prohibition, allowing for the purchase of “prepared foods fit for immediate consumption and hot foods” with SNAP benefits.^{xxix}

Increase Access to SNAP

For active-duty military, exclude the basic allowance for housing as income for the purpose of qualifying for SNAP

According to the Department of Defense, 24% of active duty servicemembers are food insecure. Experts have warned such food insecurity can negatively affect military readiness, retention, and recruitment.^{xxx} Yet, thousands of families are ineligible for assistance because their basic allowance for housing (BAH) is counted as income for the purposes of qualifying for SNAP. The BAH is not counted as income for any other nutrition or economic support program. Congress should address this error and make it easier for

military families to access SNAP by treating it consistently with other nutrition programs. Legislative efforts like the Military Family Nutrition Access Act (S.347) will do just that.

For veterans, lower VA disability rating needed to qualify for SNAP work requirement exemptions

Veteran participation in SNAP remains low for a variety of reasons. One reason is that the disability rating system at the VA is not in line with the disability requirements for exemption from SNAP work requirements. The previously introduced Feed Hungry Veterans Act would lower the VA disability rating needed for Veteran SNAP applicants to be exempt from work requirements.

Provide a pathway for the successful transition from NAP to full participation in SNAP in U.S. territories

The U.S. territories of Puerto Rico, American Samoa, and the Commonwealth of the Northern Mariana Islands do not have access to SNAP.^{xxxii} Instead, these territories are enrolled in the Nutrition Assistance Program (NAP).^{xxxiii} Both programs have the goal of providing food assistance to low-income U.S. citizens.^{xxxiii} However, SNAP and NAP differ in their funding structures.^{xxxiv} SNAP is an entitlement program, ensuring all who qualify have access to its benefits,^{xxxv} whereas NAP is funded by block grants that offer fixed amounts of federal funds that must be reauthorized annually.^{xxxvi}

From an equity perspective, Puerto Rico, American Samoa, and the Commonwealth of the Northern Mariana Islands contain thousands of U.S. citizens who are not provided the same nutritional assistance as their counterparts in U.S. states.^{xxxvii} Annual funding for NAP does not cover all of the U.S. citizens who would be eligible for nutrition assistance in these territories and extends only reduced assistance to recipients.^{xxxviii} This practice discriminates against residents of U.S. territories, most of whom are people of color.^{xxxix} Allowing territories full participation in SNAP would provide increased nutrition assistance to thousands of low-income Americans and ensure federal support without delays during economic or natural crises.^{xl}

Previously introduced bills, Equitable Nutrition Assistance for the Territories Act in the Senate^{xli} and House^{xlii} would have ensured that Puerto Rico, American Samoa, and the Commonwealth of the Northern Mariana Islands would have access to SNAP benefits.^{xliii} The previously introduced Closing the Meal Gap Act of 2021^{xliv} would allow U.S. citizens in Puerto Rico, American Samoa, and the Northern Mariana Islands to participate in SNAP.^{xlv} Also, Puerto Rico Nutrition Assistance Fairness Act of 2022 would set out a process to enable U.S. citizens in Puerto Rico to participate in SNAP.^{xlvi}

Ensure Equity within SNAP

Repeal of the lifetime ban on individuals with a past felony drug conviction from receiving SNAP

Current law imposes a lifetime ban on SNAP benefits for anyone with a previous drug-related felony conviction unless a state chooses to remove or modify the ban.^{xlvii} This ban should be repealed as a matter of fairness as it disproportionately impacts Black and Latino households. The previously introduced Making Essentials Affordable and Lawful (MEAL) Act in the House^{xlviii} and Senate^{xlix} would end the ban on past drug felons receiving SNAP benefits. This has also been named as a priority in the 2022 National Hunger, Nutrition and Health Strategy.¹

Establish a mechanism for SNAP beneficiaries to equitably participate in program design, planning, and evaluation

Centering the participant experience is key to improving SNAP and making it responsive to community needs. SNAP program participants have raised the importance of being treated respectfully and recommend caseworkers employ a "trauma-informed approach." According to a report by CLASP,

“Experiencing poverty, racism, discrimination, marginalization, and the many other consequences of economic insecurity in this country is often traumatizing.” SNAP program participants also speak to the importance of SNAP agencies valuing their perspectives and engaging in community feedback and consultation. We support their recommendations calling for SNAP administrators to “gather input directly from SNAP recipients on the agency’s effectiveness, its customer service, and asset-based language,” as well as, “conduct mandatory and ongoing unconscious bias training for workers in their agency.”^{li}

Ensure that halal and kosher dietary guidelines are being met by products approved for SNAP

It is critically important that individual’s dietary needs, whether religious, medical or cultural, are met through federal nutrition programs. USDA should work with SNAP retailers to ensure that a wide array of halal and kosher products, including animal protein options are made available through SNAP. Further, faith leaders should be consulted to ensure that community needs are being met. Additionally, USDA should work with appropriate third-party certifying bodies to verify halal and kosher products to ensure community trust.

Strengthen the collection and disaggregation of data within SNAP

Data related to the SNAP program is managed by the Census-FNS-ERS Joint Project, a “long-term cross-agency effort to acquire administrative data from States, for statistical and research purposes, on USDA food assistance programs.”^{lii} According to USDA, “the project leverages those data through linkages to surveys conducted by the Census Bureau and to other administrative data files.”^{liii} Data on food insecurity currently contains significant gaps, particularly in disaggregated racial and ethnicity data on the impact of health and anti-hunger programs.^{liv} As a report issued by Bread for the World Institute in 2019 noted, “collecting this data and making it accessible to researchers is key to ensuring that programs reach all communities and that the United States is making progress toward racial equity and food security.”^{lv}

Allow for Tribal self-administration of SNAP

SNAP provides benefits to 24% of American Indian and Alaska Native households.^{lvi} Operation of federal food assistance programs are consistent with Indian self-determination and self-governance, a cornerstone of federal-Tribal relations.^{lvii} Despite this, Tribal governments continue to seek authority to take control of the administration of SNAP in order to improve food access and efficiency of the program. If SNAP was Tribal self-administered, this would allow for tribes to promote incorporate culturally competent food and nutrition materials, promote traditional foods, destigmatize the program, and making sure the program is administered in a culturally competent manner.

There is no current mechanism to allow for this, but proposed Senate bipartisan legislation, the SNAP Tribal Food Sovereignty Act, would permit Tribes to enter into bilateral agreements with the USDA and self-administer SNAP.^{lviii}

The Emergency Food Assistance Program (TEFAP)

TEFAP is a federal program that supports food banks, food pantries, and other emergency feeding organizations by supplementing the diets of low-income individuals through a variety of USDA-purchased nutritious, high-quality commodities. Local organizations and community action agencies directly provide nutritious foods to low-income households for consumption or for the use of preparing and serving meals in a congregate setting. In 2020, an estimated 8.7 million households obtained

emergency food from a food bank, food pantries, or churches: an increase of 4.4% from the previous year.^{lix} According to an ERS analysis, 55.9% of households using emergency feeding organizations were food insecure in 2020, and roughly half of these households experienced very low food security.^{lx} In addition, emergency feeding organizations may serve as a safety net for food insecure households who are ineligible for or do not participate in other federal food assistance programs, such as SNAP.

Include additional mandatory funding for TEFAP in recognition of the high need

TEFAP supports the emergency feeding network by distributing domestically grown USDA foods for use by emergency feeding organizations, including soup kitchens, food recovery organizations, and food banks, which work to distribute the foods directly to low-income households. TEFAP also provides administrative funds to defray State and local costs associated with the transportation, processing, storage, and distribution of USDA Foods. The allocation of both Federal food and administrative grants to States is based on a formula that considers unemployment levels and the number of persons with income below the poverty level.

As Americans face higher costs for food, food banks have seen an increase in people relying on their foods. Over 53 million people visited charitable food assistance programs in 2021. In a 2022 survey, Feeding America reports 90% of food banks reported seeing increased or steady demand for services amid record food price increases.

Congress should reauthorize and increase mandatory funding for TEFAP food purchases to \$500 million per year, adjusted for inflation. This would double the annual amount of funding for TEFAP entitlement commodities set by the farm bill. Congress should also reauthorize and increase discretionary funding for TEFAP storage and distribution to \$200 million per year. Additionally, Congress should reauthorize \$15 million per year in discretionary funding for TEFAP infrastructure grants.^{lxi}

Increase Self-Administration of TEFAP for Tribes

A recent study that analyzed hunger data among Native American households found that low food security households reported that they rarely had access to healthy foods, run out of money for groceries several times year, and depend on federal food assistance.^{lxii} The recent coronavirus pandemic revealed gaps in federal feeding systems, and many Tribal communities began searching for additional food assistance from sources, such as TEFAP. TEFAP is a program that fills the gap when households are ineligible for SNAP, finished their monthly SNAP benefit, or in the significant case for Native Americans, have received their monthly FDPIR food package and are ineligible to participate in SNAP and FDPIR in the same month. Although many states have approved Tribal citizens that are recipients of TEFAP foods, Indian Tribal Organizations (ITOs) are not allowed to enter into direct agreements with USDA to distribute TEFAP foods. Since ITOs are not states, they cannot operate as state agencies for the purpose of TEFAP.

Most TEFAP foods are not traditionally consumed by Native American communities. Enabling Tribes to self-administer TEFAP would allow for Tribes to serve their citizens more directly and acquire culturally appropriate foods. In addition, allowing Tribal Nations to administer TEFAP would better equip them to respond to future crisis affecting food systems.^{lxiii} TEFAP should be amended to provide Tribal Nations with the authority to partner with local and regional food banks and administer their own emergency food management programs.

Expand the list of Kosher and Halal animal protein options to the list of TEFAP foods

When servicing TEFAP, it is crucial to consider a participant's cultural and religious food practices. Participants that follow a kosher or halal diet may not be able to accept all the items available through TEFAP food packages. There is currently a limited list of certified kosher and halal food items that are available through TEFAP, especially but not limited to protein options. Halal- and kosher-observant households face limited protein options through TEFAP, including peanut butter, canned pink salmon, and fresh eggs.^{lxiv} Many kosher- and halal-observant households still grapple with general consumption of kosher and halal foods due to unavailability and inaccessibility of local kosher and halal food retailers and kosher and halal stores that accept food assistance benefits. When kosher and halal options are available, households face higher food prices.

Some USDA foods are certified kosher and halal by an established certifying authority. For halal, implementing legislation and third-party oversight is critical to ensuring that a product is truly halal and to building trust and confidence amongst Muslim consumers. This ensures that the halal claim adheres to established halal standards and guidelines. Like accredited kosher, gluten-free, and organic certification processes, halal must be implemented as a total compliance program across the supply chain. It is essential that the USDA work with qualified third-party oversight bodies to verify halal products. It is also important for local organizations to consult with Jewish and Muslim leaders on culturally and religiously sensitive dietary options to ensure that specific community needs are being met.

Halal is a sacred value for Muslims and is integral to their spiritual preservation. Halal consumers have provided testimonials on the choices they must make: eating food that conflicts with their religious and spiritual values or preserving their sacred values and forgoing food security. These testimonies confirm that even low-income Muslims will forego access to food to preserve their faith. In times of economic difficulties and food scarcity, households face having to change their dietary habits to alternatives that do not align with their religious and cultural beliefs. TEFAP should promote cultural competence through providing culturally important food options that adequately meet the faith-based dietary guidelines of individuals who observe kosher and halal. Moreover, this issue aligns with the National Strategy on Hunger, Nutrition, and Health priority of understanding and addressing the gaps in meeting the needs of low-income individuals and families seeking cultural foods including identifying options and expanding access to foods suitable for kosher and halal-observant communities.^{lxiv}

Commodity Supplemental Food Program (CSFP)

CSFP supplements the diets of low-income persons at least 60 years of age with nutritious USDA commodity foods that are distributed by local food banks or local sponsors. It is a critical nutrition program that delivers up to 736,110 food packages each month to seniors with an income at or below \$16,744.^{lxv} Although CSFP food packages do not supply a complete diet, its food packages are designed to supplement necessary sources of nutrients that are typically lacking in the diets of seniors with low food security, including protein, iron, zinc, and vitamins B-6 and B-12. It also helps low-income seniors stretch their monthly food dollars. CSFP serves 619,000 seniors with incomes at or below 130% of the Federal Poverty Line and helps vulnerable seniors choose between food and other basic needs.^{lxvi} Some communities deliver the food package directly to the participant's home, which is a key program feature for seniors with limited mobility.

Increase access to the program through the addition of a healthcare deduction

A senior is eligible for CSFP if their income is at or below 130 percent of the Federal Poverty Line with a few deductions for income and social security taxes, insurance premiums and bonds. There is currently not a healthcare deduction for CSFP eligibility. Seniors face eligibility barriers when their Medicare payments for health services are included in income determination. Medicare payments are deducted before the senior receives their benefits and are not directly available to the senior.^{lxvii} Despite this, they are included as income when determining CSFP eligibility. Adding a healthcare deduction will increase access to CSFP for many in-need seniors that do not meet requirements under current income eligibility provisions.

Expand food access for seniors through home delivery of CSFP

The COVID-19 pandemic brought America's hunger crisis to the forefront while exacerbating the various barriers to food access that exist for far too many families. In response, organizations providing food assistance created innovative service models to get meals to those in need. One of those models that can be a long-term solution to help end hunger was expanded use of home delivery of CSFP food packages. CSFP recipients are low-income and many have little to no means of transportation.^{lxviii} CSFP is a program of last resort for low-income seniors who may not qualify for other forms of nutrition assistance. Providing home delivery for CSFP food packages removes barriers to access -- like lack of reliable transportation or mobility restrictions -- and ensures that seniors who are homebound still have their nutrition needs met. It also improves the experience of the program for recipients by increasing convenience and reducing risk of stigma. Together, these benefits can help make the program more accessible to potential recipients and help states reach more of their CSFP caseload. However, adequate funding is a barrier for state agencies and local CSFP operators looking to initiate or expand home delivery options for recipients since existing administrative funds are often already fully utilized for other operations. Congress should authorize a grant program to provide additional funding to state and local CSFP agencies to carry out projects that expand home delivery to recipients facing barriers to access.

Food Distribution Program on Indian Reservations (FDPIR)

Although Native Americans make up less than 2% of the U.S. population, they suffer from some of the highest rates of food security, diet-related diseases, and socioeconomic challenges.^{lxix} FDPIR provides USDA purchased foods to income-eligible households living on Indian reservations and to Native American households residing in designated areas near reservations or in Oklahoma. For many households, FDPIR is an alternative to the SNAP program because of lack of easy access to SNAP offices or authorized grocery retailers. In 2020, the program served 75,000 Native American adults and children each month.^{lxx} FDPIR is administered by 105 Tribal nations and three state agencies and provides benefits and nutrition education to approximately 278 federally recognized tribes across the U.S.^{lxxi} The 2018 Farm Bill authorized USDA and the Department of the Interior to collaborate on a Self-Determination Demonstration Project to offer greater flexibility in their administration of FDPIR. This empowers Tribal nations by providing them with more options in selecting foods for their food packages that better with their traditional preferences and support indigenous agricultural communities.

End the ban that disallows participants to use FDIPIR and SNAP benefits within the same month. FDIPIR is the only commodity food program that cannot be used in conjunction with SNAP benefits. Removing the statutory prohibition of dual utilization of SNAP and FDIPIR would improve food access and opportunities for Tribal households to feed their families.^{lxxii} FDIPIR recipients should be able to exercise their freedom of choice of food and not be limited to the food options offered in the FDIPIR program. FDIPIR participants have less freedom to choose among foods than their SNAP counterparts. Many FDIPIR participants alter their benefit usage patterns by switching to SNAP when they need to “load up” on food staples that are not offered in FDIPIR food packages or when there are climate and seasonal switching patterns on reservations that may hinder travelling to SNAP food vendors due to climate extremes such as cold, snowy, icy winters or high desert temperatures.^{lxxiii} Neither program provides sufficient food for participants in remote places and by allowing simultaneous usage of FDIPIR and SNAP, these programs can be coalesced to combat food insecurity in Tribal nations.^{lxxiv} Moreover, participants can benefit from the ability to switch between programs as it provides a financial cushion for household economic instability. Native households with fluctuating monthly income may benefit from SNAP in months of low earnings and be better off with FDIPIR in months of higher earnings.^{lxxv} Given the differences in program structure and eligibility, there is a place and need for both programs, and people should be able to access both FDIPIR and SNAP simultaneously.

Increase Self-Administration of FDIPIR for Tribes

The 1975 Indian Self-Determination and Education Assistance Act (P.L. 93-638) provided Indian tribes with greater autonomy and involvement in the direction of services, programs, functions, and activities provided by the federal government.^{lxxvi} Despite this, Indian reservations and communities are granted limited authority over the food assistance program that was created to specifically address high levels of food insecurity among Native American communities. The 2018 Farm Bill expanded a limited form of 638 Authority to FDIPIR and authorized the USDA to enter a limited number of multiyear contracts with Tribal governments to procure domestically grown meat, fish, grains, and fresh produce. The USDA provided \$3.5 million to eight Tribal governments in the U.S. to set up demonstration projects that provided tribes with greater control over the food procurement decisions made for their FDIPIR programs.^{lxxvii} This initiative aimed to strengthen regional Tribal food economies by integrating the purchase of traditional and culturally relevant Native American and Alaska Native foods from USDA-authorized Tribal farmers and producers. This project was the first step to expand self-governance at the USDA.

The Farm Bill should make the FDIPIR 638 Authority permanent and expand it to all Tribal governments administering FDIPIR that would like to enter into an agreement with USDA. As demonstrated in the FDIPIR Self-Demonstration Projects, Tribal nations are empowered to provide culturally appropriate food choices that better align with their dietary preferences to their Tribal members. These projects allow participating tribes to choose foods that align with Tribal dietary preferences. It also allows for Tribal discretion on designing, purchasing, and distributing FDIPIR food. Expanding Section 638 Authority for Tribal Nations supports indigenous cultural economies, improves indigenous health, and combats the high levels of food insecurity among Native Americans.

Allow for more culturally appropriate foods in the FDIPIR food packages

Native foods are of historical and cultural significance to Indian Country that have provided sustenance to their people for centuries. The dietary shift from traditional to commodity foods due to Native

American removal from their lands onto Indian reservations have contributed to the dramatic dietary shift from traditional to commodity foods. This has contributed to the high rates of obesity and chronic-related diseases among Native American populations.^{lxxviii} Native communities continue to call for quality, nutritious foods that are also culturally relevant foods in FDPIR. In a 2016 USDA study, data showed that FDPIR participants wanted programmatic improvements that would curate a more culturally relevant, local, and fresh food package.^{lxxix} There was variance in requests for cultural food items across Indian Country, indicating the need for socially and contextually relevant foods that are reflective of the food preferences of different Tribes. Regionalizing food procurement and distribution ensures more culturally appropriate food access across Indian Country.^{lxxx} Allowing for more culturally appropriate foods to be integrated in FDPIR food packages addresses health equity, ameliorates Native American food security, and enables food sovereignty in Indian Country.

Gus Schumacher Nutrition Incentive Program (GusNIP)

GusNIP, formerly known as the Food Insecurity Nutrition Incentive, is a competitive food incentive program that leverages SNAP to increase nutrition security. The project provides incentives to SNAP participants to increase the purchase of fruits and vegetables by bringing together partners from various parts of the food and healthcare system. The Double-Up Food Bucks program provides fruit and vegetable incentives for SNAP participants at farmers markets, grocery stores, and other SNAP retailers by incentivizing a dollar-for-dollar match. During the coronavirus pandemic, with the increase in food insecurity and Pandemic-EBT dollars, more SNAP households used Double Up Food Bucks than ever before: approximately 759,000 families participated in the program and over 5,500 farmers.^{lxxxi} The Produce Prescription program targets low-income patients who are living with or at risk of diet-related health issues by leveraging medical assistance programs to provide fresh fruits and vegetables “prescriptions” that patients can redeem benefits at on-site markets.

Add Veterans Farmers Markets to GusNIP

According to the Department of Defense, 24 percent of active duty servicemembers and 11 percent of veterans are food insecure.^{lxxxii} In a Center for Budget Policy and Priorities report, about 1.2 million veterans live in households that participated in SNAP between 2017 to 2019.^{lxxxiii} Veteran farmers markets food programs have been shown to contribute to an improved quality of life for veterans.^{lxxxv}

Veteran Affairs Facilities are currently eligible to participate in produce prescription projects under GusNIP. The program is currently limited in reach and further funding and expansion of this program would increase veterans’ access to fresh produce and address immediate nutrition concerns.

Expand GusNIP to address equity issues

GusNIP is a competitive grant process, and many inequities exist within the program. Like many historic farming pilot programs and subsidies, large-scale farmers have been favored, and small-scale and family farms have not benefitted from federal programs aimed to support the agricultural ecosystem. Successful grantees are often larger, well-established, white-led organizations that have the financial capacity to generate the required matched dollar amount, prepare competitive grant applications, and administer program activities.^{lxxxvi} The match requirement that must be pooled from local resources can create barriers to participation for marginalized communities.^{lxxxvii} Because Black, Latino, and Indigenous farmers are under-represented among farmers and food retail owners, they are also likely under-represented among the farmers and food producers that participate in GusNIP-funded programs. In addition, grants often do not provide sufficient administrative, technical, operating, and infrastructural

support, which may be needed more in lower-resourced organizations and communities. In addition, current funding levels allow issuance of incentives to only a small fraction of SNAP beneficiaries. In order to intentionally support BIPOC farmers, sufficient funds must be available to incentive SNAP beneficiaries to shop for fresh produce at GusNIP-participating local farmers markets and food retail store that will in turn support local farmers and the local economies. Expanding GusNIP in a manner that addresses the root causes of exclusion and under-representation of BIPOC farmers in agriculture and agriculture subsidy programs will increase the support agriculture production from socially-disadvantaged farmers.

Agricultural Programs

We understand the value of a robust agricultural sector to our nation's health and well-being. Within this system, the vitality of America's family farmers and ranchers is critical to a strong food system. Family farmers and ranchers have been particularly impacted by the effects of the pandemic, including supply chain disruptions, labor shortages, climate shocks, inflation and more. The Farm Bill provides a vital opportunity to support family farmers and ranchers through fair and equitable policies that increase resilience in the face of volatility. The Farm Bill further provides an opportunity to support agricultural research to identify new strategies for improving farm productivity and growth.

The various sections of the Farm Bill address interdependent parts of our food system, from production to consumption to research. The Alliance comprises a diverse set of members representing different parts of the food system, and thus have a diverse set of priorities related to other titles. As the National Farmers Union recognized at its 121st Anniversary Convention, "The farm bill is also a food bill. The nutrition title is key to reducing hunger and poverty, and improving food and nutrition security."

The Alliance generally supports National Farmers Union's 2023 Farm Bill recommendations^{lxxxviii} aimed to strengthen the farm safety net, expand conservation and improve equitable access to markets, as well as, Farm Journal Foundation's policies to bolster agricultural research and development.^{lxxxix}

Global Programs

Food for Peace (FFP) Title II

Authorized by the Farm Bill and implemented by USAID's Bureau for Humanitarian Assistance, Food for Peace Title II (FFP) programs provide emergency and long-term development food assistance targeting the most vulnerable populations. Emergency assistance is delivered primarily to communities affected by recurrent natural disasters, conflict, and chronic food insecurity. Development assistance builds on emergency relief efforts to support early recovery and strengthen communities' resilience to shocks. USAID utilizes resources authorized under Title II of the Food for Peace Act and appropriated via annual agriculture appropriations bills to fund emergency and non-emergency food assistance programs worldwide. In Fiscal Year 2022, USAID provided approximately \$2.6 billion in Title II Food for Peace assistance, procuring nearly 1.8 million metric tons of food from the United States and reaching nearly 45 million beneficiaries in 31 countries. Nearly 90 percent of Title II assistance was for emergency

responses, while 10 percent was for nonemergency resilience and food security programs. We support reauthorization of Food for Peace Title II for another five years with robust funding. Current Farm Bill level authorization is \$2.5 billion annually. Current funding level appropriated for Food for Peace is \$1.74 billion in FY2023. Alliance is seeking \$2.0 billion in FY 2024.

Protect the funding level of Food for Peace non-emergency programs

Current law requires no less than \$365 million funding shall go to nonemergency programs (the “safe box”). Alliance supports protecting the funding level for the safe box to support programs which help build resilience in vulnerable communities.

Increase flexibility for non-emergency assistance

Currently Title II Food for Peace requires USAID to utilize U.S. in-kind commodities for non-emergency programming. Reform Food for Peace to increase flexibility for non-emergency services by eliminating commodity requirement in non-emergency programming, increasing cash availability for local and regional procurement and associated services. By making U.S. commodities and option, rather than a requirement, this proposal allows for the most effective form of aid for non-emergency assistance – whether it is U.S. sourced food, food produced or procured locally, or market-based assistance – to save lives, protect livelihoods and strengthen communities’ resilience to chronic challenges and sudden crisis.

McGovern-Dole International Food for Education and Child Nutrition Program

The McGovern-Dole International Food for Education and Child Nutrition Program (McGovern-Dole) helps support education, child development and food security in low-income, food-deficit countries around the globe. The program provides for the donation of U.S. agricultural commodities, as well as financial and technical assistance, to support school feeding and maternal and child nutrition projects. McGovern-Dole marked its 20th anniversary of promoting children’s health and education around the world last year. The McGovern-Dole program has provided over 5.5 billion school meals, benefiting over 31 million school-age children in communities in over 48 countries around the world. Last year the McGovern-Dole Program received \$243 million to support education, child development and food security programs. We support reauthorization of McGovern-Dole for another five years with robust funding.

Increase flexibility for local and regional procurement

Prior to the 2018 Farm Bill, McGovern-Dole did not have a local and regional procurement (LRP) requirement. The 2018 Farm Bill established a program requiring that 10% of McGovern-Dole funds be used for LRP. 2023 Farm Bill proposal is to establish an increased range of 10-20% rather than a target of 10% for LRP. This would provide USDA more flexibility in the McGovern-Dole Program to better take into account the local context, including producer and market capacity. This funding should also be used for capacity-building activities that support local and regional procurement.

Bill Emerson Humanitarian Trust

The Bill Emerson Humanitarian Trust (BEHT) was created for times of exceptional needs in response to unanticipated food crises abroad. The Bill Emerson Humanitarian Trust makes funds available, for the purchase of U.S. commodities, to provide emergency humanitarian food assistance in developing countries to alleviate severe hunger and malnutrition in times of famine, conflicts, and other extraordinary circumstances. When a food crisis arises and food aid is not available from other U.S.

government programs, the Secretary of Agriculture may authorize the release of funds from the trust in order to quickly meet immediate needs.

Replenish the BEHT

Last year the BEHT was unprecedentedly depleted due to the global food crisis exacerbated by the war in Ukraine. BEHT was completely drawn down (\$282 million) with emergency food assistance going to Ethiopia, Kenya, Sudan, Somalia, South Sudan and Yemen. The BEHT must be replenished in anticipation for emergencies this year given the continued global food crisis and pressure on the U.S. government for assistance.

Food for Progress

The Food for Progress Program (FFPr) provides for the donation of U.S. agricultural commodities to developing countries and emerging democracies committed to introducing and expanding free enterprise in the agricultural sector. U.S. agricultural commodities donated to recipient countries are sold on the local market and the proceeds are used to support agricultural, economic, or infrastructure development programs. Food for Progress has two principal objectives: to improve agricultural productivity and to expand trade of agricultural products.

Increase the Freight Ceiling

Increase the freight ceiling from \$40 million to \$55 million. The FFPr is funded not with appropriations, but from the Commodity Credit Corporation (CCC). While there is no ceiling on how much the CCC may spend on commodities, there is a limit, however, on what CCC is allowed to spend on freight of \$40 million/year. This has remained unchanged since the program's inception in the 1990's.

Application of Cargo Preference for Food for Progress

Some 20 years ago USDA agreed to settle a lawsuit by applying cargo preference's 50% requirement on a country-by-country basis rather than globally as for all other food aid programs. This has proven to enormously increase costs by necessitating small shipments. Add legislative language stating that cargo preference application for Food for Progress must be the same as for other food aid programs. This increase in program efficiency will save millions of dollars annually.

Nutrition

Increase support for Nutrition throughout International Food Aid Programs

While nutrition is a key component of International Food Aid programs, like Food for Peace Title II and the McGovern-Dole Food for Education Program, it is critical that nutrition be further prioritized in these programs as rates of global hunger and malnutrition continue to rise. Malnutrition is the greatest threat to child survival worldwide, making children more susceptible to deadly infectious disease and contributing to more child deaths, roughly 3 million a year, than AIDS, malaria, and tuberculosis combined. To further support nutrition security, particularly amongst young children and mothers, USAID and USDA FAS should work with each implementing organization to ensure nutrition interventions like breastfeeding counseling or support services, Vitamin A supplementation, prenatal vitamins, and ready-to-use therapeutic foods (RUTFs), are further prioritized and where possible, included, in their implementation plans.

Research

Reauthorization of the Farm Bill Research Title with robust funding for agricultural research activities that support innovation for improving agricultural production and sustainable, safe, nutritious food systems. Support for research programs that fund international research, such as the Foundation for Food and Agriculture Research (FFAR) should be reauthorized, given robust funding, and added to the baseline. Expand authorities within USDA's Foreign Agricultural Service aimed at agricultural development to ultimately reduce the need for emergency food aid.

Climate Adaptation

Advance policies and funding for programs to enhance adaptation measures for small-holder farmers in lower-income countries and communities and help reduce the negative impacts of climate change on food systems. Support small-holder farmers to afford and adopt regenerative practices that help ensure the long-term environmental health of their communities.

List of Alliance Member Organizations*

Corporate

Amazon
American Peanut Council
Bank of America
Cantera Partners
Cargill, Inc.
Corteva Agriscience
DoorDash
GrainPro
Grubhub
Instacart
Nuro
United HealthCare

Non-Profit

1,000 Days
AARP
ACDI/VOCA
A Place at the Table
ARAHA
Association for International Agriculture and Rural
Development (AIARD)
Black Women's Health Imperative
The Breadfruit Institute
CEO Action for Racial Equity
Changing Narratives Africa
Congressional Hunger Center
Cultivating New Frontiers in Agriculture (CNFA)
Edesia
The Farmlink Project
Feeding America
Food Enterprise Solutions
Food Rescue Hero
FoodFinder
Global Child Nutrition Foundation (GCNF)
The Global FoodBanking Network
Global Volunteers
Growing Hope Globally
The Healthy Living Coalition
Helping Hands Community
Helping the Hungry Virtually
IFANCA (Islamic Food and Nutrition Council of
America)
The Hunger Project
Hungry Harvest
InterAction

March of Dimes
Meals on Wheels America
MEANS Database
Meds & Food for Kids
Mercy Without Limits
Move For Hunger
National Farmers Union
National FFA Organization
National WIC Association
One Acre Fund
Opportunity International
The Outreach Program
Penny Appeal USA
Poetry X Hunger
ProMedica
RESULTS
Rise Against Hunger
The Root Cause Coalition
Save the Children
Seed Programs International
Share Our Strength - No Kid Hungry
Souper Bowl of Caring
World Food Program USA

Faith-Based

Bread for the World
Christian Connections for International Health
Church World Service (CWS)
Evangelical Lutheran Church in America (ECLA)
ICNA Relief
Islamic Relief USA
Lutheran World Relief
MAZON - A Jewish Response to Hunger
Partners Worldwide
Society of St. Andrew
World Renew

University

Auburn University
Maxwell | Syracuse University
Walsh University

Foundation

AARP Foundation
Eleanor Crook Foundation
Farm Journal Foundation
SODEXO Stop Hunger Foundation

**Alliance to End Hunger policy priorities are developed through consultation with the Alliance's Advocacy Committee. This letter is signed by the Alliance to End Hunger as an organization and does not necessarily reflect official views of the Alliance's individual members.*

Endnotes

- ⁱ USDA, <https://www.fns.usda.gov/pd/supplemental-nutrition-assistance-program-snap>
- ⁱⁱ This benefit amount is higher than the historical average due to inclusion of SNAP Emergency Allotments (a minimum of \$95 per household per month).
- ⁱⁱⁱ Center on Budget and Policy Priorities <https://www.cbpp.org/research/food-assistance/snap-helps-struggling-families-put-food-on-the-table-0#:~:text=Research%20shows%20that%20SNAP%20reduces,who%20receive%20SNAP%20as%20children.>
- ^{iv} USDA, <https://www.ers.usda.gov/topics/food-nutrition-assistance/supplemental-nutrition-assistance-program-snap/economic-linkages/#:~:text=It%20provides%20assistance%20to%20more,automatic%20stabilizer%20to%20the%20economy.>
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- ^{vi} Joseph Llobrera et al., *USDA Announces Important SNAP Benefit Modernization* (2021), <https://www.cbpp.org/research/food-assistance/usda-announces-important-snap-benefit-modernization>.
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- ^{viii} Llobrera et al., *supra* note 3.
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- ^x *Id.*; Press Release, U.S. Department of Agriculture, *USDA Modernizes the Thrifty Food Plan, Updates SNAP Benefits* (Aug. 16, 2021), <https://www.usda.gov/media/press-releases/2021/08/16/usda-modernizes-thrifty-food-plan-updates-snap-benefits>.
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- ^{xiii} *Id.* at 2.
- ^{xiv} Elaine Waxman & Nathan Joo, *How Working Families Are Affected by Restricting Broad-Based Categorical Eligibility for SNAP*, Urb. Inst., 2 (2019), https://www.urban.org/sites/default/files/publication/101027/how_working_families_are_affected_by_restrictin_g_broad-based_categorical_eligibility_for_snap_0.pdf.
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- ^{xvi} *Id.*
- ^{xvii} *Id.*
- ^{xviii} Stabenow, *supra* note 6, at 2; Dottie Rosenbaum, *SNAP's "Broad-Based Categorical Eligibility" Supports Working Families and Those Saving for the Future*, Ctr. on Budget and Pol'y Priorities (2019), <https://www.cbpp.org/research/food-assistance/snaps-broad-based-categorical-eligibility-supports-working-families-and>.
- ^{xix} U.S. Dep't of Agric., *What Can SNAP Buy?* (2021), <https://www.fns.usda.gov/snap/eligible-food-items>.
- ^{xx} <https://www.dietaryguidelines.gov/resources/2020-2025-dietary-guidelines-online-materials/top-10-things-you-need-know-about-dietary#:~:text=Most%20Americans%20still%20do%20not,scores%20can%20improve%20Americans%20health.> See #8.
- ^{xxi} USDA, *Foods Typically Purchased by Supplemental Nutrition Assistance Program (SNAP) Households*, November 2016, <https://www.fns.usda.gov/snap/foods-typically-purchased-supplemental-nutrition-assistance-program-snap-households>.
- ^{xxii} The Federal Bureau of Investigation defines skimming as when a device illegally installed on ATMs, POS terminals, or fuel pumps capture data or record cardholders' PINs to then steal from victims' accounts. See <https://www.fbi.gov/how-we-can-help-you/safety-resources/scams-and-safety/common-scams-and->

[crimes/skimming#:~:text=Skimming%20occurs%20when%20devices%20illegally,then%20steal%20from%20victims'%20accounts.](#)

^{xxiii} First, federal law allows states to exempt up to 12% of their SNAP caseload that would become ineligible for benefits due to the ABAWD time limit. Second, states may apply for waivers to exempt the entire state or certain geographic areas of the state from this rule due to high unemployment rates or an insufficient number of jobs.

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^{xxv} New Hampshire Department of Health and Human Services, *Cliff Effects Final Report* (Sept. 3, 2021), <https://www.dhhs.nh.gov/sites/g/files/ehbemt476/files/documents2/cliff-effects-final-report.pdf>.

^{xxvi} *Id.*

^{xxvii} Stephanie Ettinger de Cuba, *Cliff Effects and the Supplemental Nutrition Assistance Program*, Federal Reserve Bank of Boston (Jan. 17, 2017), <https://www.bostonfed.org/publications/communities-and-banking/2017/winter/cliff-effects-and-the-supplemental-nutrition-assistance-program.aspx>.

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^{xxxi} U.S. Dep't of Agric. Food and Nutrition Serv., *Nutrition Assistance Program (NAP) Block Grants*, <https://www.fns.usda.gov/nap/nutrition-assistance-program-block-grants>.

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^{xxxiii} U.S. Dep't of Agric. Food and Nutrition Serv., *Update to Feasibility Study of Implementing USDA's SNAP in Puerto Rico*, <https://www.fns.usda.gov/snap/update-feasibility-study-implementing-usda-snap-puerto-rico>.

^{xxxiv} *Id.*

^{xxxv} *Id.*

^{xxxvi} *Id.*

^{xxxvii} Martinez, *supra* note 18.

^{xxxviii} *Id.*

^{xxxix} Francis G. Torres, *From NAP to SNAP*, CNE (2022), <https://grupocne.org/2022/09/01/from-nap-to-snap/>; Adriel I. Derieux, *Congress Can't Discriminate Against Puerto Rico*, ACLU (2021), <https://www.aclu.org/news/civil-liberties/congress-cant-discriminate-against-puerto-rico-residents-just-because-they-live-there>.

^{xl} Torres, *supra* note 22; Feeding America, *Farm Bill: Congress Must Protect and Strengthen SNAP and Other Anti-Hunger Programs*, 3 (2022), <https://frac.org/wp-content/uploads/2022-FarmBillPriorities.pdf>.

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^{xliii} *Id.*

^{xliv} S. 2192, 117th Cong. (2021), <https://www.congress.gov/117/bills/s2192/BILLS-117s2192is.pdf>.

^{xlv} *Id.* at 14-20.

^{xlvi} H.R. 5220, 117th Cong. (2021), <https://www.congress.gov/117/bills/hr5220/BILLS-117hr5220ih.pdf>.

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^{xlviii} H.R. 2837, 117th Cong. (2021), <https://www.congress.gov/bill/117th-congress/house-bill/2837>.

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^{lxiii} Native Farm Bill Coalition

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