For more than 42 years, the Capital Area Food Bank has served as the backbone of the region’s hunger relief infrastructure. Throughout this time, we have responded to several crises—none more significant than COVID-19. In FY21, the Food Bank distributed 75,451,812 million meals to food insecure clients throughout our service area. Based on the recent example of the Great Recession, the Food Bank expects to see elevated levels of need for years to come. The policy recommendations below represent practical and impactful interventions that can be enacted in 2022 to build upon our distribution efforts and reduce food insecurity among our 448,500 clients in our service area.

**Improve Client, Agency, and Food Bank Experience Through The Emergency Food Assistance Program**

The Emergency Food Assistance Program (TEFAP) is a federal program administered by USDA to help alleviate food insecurity through the provision of free emergency food assistance. Through the program, USDA purchases a variety of surplus agricultural commodities and distributes funds to states based on various metrics of need. States lean heavily on food banks to oversee the delivery and administration of commodities to smaller, recipient agencies throughout their respective regions. Of the 200 Feeding America food banks, the Capital Area Food Bank is one of only six with three states in its service area. Thus, we are held to vastly different approaches and requirements by state, for the same federal program.

Based on our experience administering this program across three states, and after discussions with other Feeding America food banks, we recommend policymakers amend the program to make it more streamlined, accessible, and beneficial for clients for food banks and agencies.

**Streamline Administrative Requirements**

States have a significant amount of latitude to oversee, audit, and monitor TEFAP administration by food banks and participating agencies. However, based on our conversations with several food banks across the country, this degree of latitude results in widely different programmatic requirements, deadlines, technologies, and outcomes across the country. We request Congress set standards for reporting, site reviews, and audits that are streamlined and uniform across all states.

**Increase Client Access**

TEFAP’s authorizing language and commensurate federal regulations require states to ensure that beneficiaries are “needy.” Each state takes its own approach to assessing whether a client fits this criterion, often calculating overall percentage of poverty threshold or enrollment in social safety net programs; this equates to varying degrees of eligibility across states, for the same federal program. We request Congress disallow proxies for need beyond client self-declaration. Additionally, we request USDA discontinue allowing states to collect government identification, limit the number of times a client can receive TEFAP in a given timeframe, and restrict programmatic access to clients’ resident county or state.

**Diversify Commodity Offerings and Allow for Food Bank Input**

Food banks have very little autonomy over the types and quantities of food provided for distribution. This can make administration difficult, given that food banks are consistently adhering to nutrition ratio standards, ordering for a range of cultures and dietary needs, and offering a range of products to supplement other services and food items. We request USDA incorporate practices to diversify commodity offerings to reflect the cultural and dietary needs of clients.
The American Rescue Plan enhanced the federal Child Tax Credit (CTC) for nearly 66 million U.S. children; roughly 90% of American children have benefited from advance monthly payments enabling parents to afford basic necessities. Since March 2021, it is estimated the enhanced CTC will have reduced the number of children experiencing poverty by more than 40%.

**Permanently Enact the Child Tax Credit**

We request Congress enact the CTC enhancements as a permanent fixture of anti-poverty and anti-hunger interventions.

In the last ten years, the Capital Area Food Bank has distributed **415,314,827 meals** to food insecure clients in Maryland, Virginia, and the District of Columbia.

**Modernize SNAP Eligibility Standards**

SNAP has proven to be one of the most effective anti-hunger programs in the United States. Since the start of the pandemic, the federal government has reevaluated the benefit mechanism (Thrifty Food Plan) that determines overall monthly household SNAP allocations—resulting in a permanent average benefit increase of more than 21%. This modernization resulted in the most significant benefit increase in program history. Thus, we believe SNAP eligibility standards should also be updated. Despite the program’s success, the government can modernize eligibility rules to better respond to the needs of groups who are often excluded from participation:

**College Students**

In late 2018, the Government Accountability Office estimated that more than 30% of college students struggle with food insecurity, and that more than 2 million at-risk students potentially eligible for SNAP are not utilizing benefits. These figures suggest that an estimated 127,000 college students in our region were struggling with food insecurity before the pandemic. Currently, students enrolled half-time or more are not eligible for SNAP unless they meet specific exemptions.

**We request eligibility is amended to allow for greater participation among college students enrolled half-time or more.**

**Working Adults without Children**

In most instances, adults between the ages of 18 and 49 who do not have children and are not disabled are limited to SNAP benefits for only three months within a three-year timeframe if they are not working or participating in a workforce training program of at least 20 hours a week. This three-month time limit on SNAP benefits disqualifies many who are searching for work or willing to participate in a qualifying work or job training program. Although this rule was suspended in March 2020, many of our clients struggled to meet this requirement in normal times.

**We request this rule is permanently repealed so that the country continues to invest in a more equitable recovery.**

**Expand Women, Infants, and Children Program Eligibility to Age 6**

Women, Infants, and Children (WIC) serves as a lifeline for low-income families by providing nutritious foods, nutrition education, breastfeeding support, and referrals to health care and social services for pregnant women, new mothers, infants, and young children. The program supports a healthy foundation up until age 5, at which point policymakers presume children will begin to receive breakfast and lunch at public schools. For some children, however, this creates a gap in coverage between their fifth birthday and their enrollment in kindergarten.

**We request that Congress close this “WIC gap” by extending eligibility to age 6.**

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