

FEDERAL 2023 Policy Agenda



For over 42 years, the Capital Area Food Bank has served as the backbone of the region’s hunger relief infrastructure. In FY22, the Food Bank distributed 52 million meals to neighbors in need across the DMV. However, we know that ending hunger takes more than good food today; advocating for policies and programs that enable long-term food security, financial empowerment, and health equity is an essential aspect of our commitment to building brighter futures. The following policy priorities—informed by data, community partners, and those we serve—represent impactful interventions that the Food Bank will advocate for in 2023 to end hunger and its root causes.



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 the USDA to help alleviate food insecurity through the provision of free emergency food assistance. Through the program, the 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 each state, for the same federal program.

Based on our experience administering this program across three states, and after leading an extensive effort to survey other multi-state food banks across the country, we recommend policymakers amend the program—[via ongoing administrative rulemaking](#) or the upcoming Farm Bill—to make it more streamlined, accessible, and beneficial for neighbors, partner agencies, and food banks.

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 by calculating their 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 that the USDA disallow state collection of government identification and client signatures; remove limits on the number of times a neighbor can receive TEFAP in a given timeframe; and cease restrictions on programmatic access based on collection of full address or proof of residence in a county or state.**

Streamline Administrative Reporting Requirements

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

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. Additionally, although food banks must abide by the administrative and operational requirements put forth by states within the state distribution plan, food banks often have little input into said plan. **We request that the USDA continue to incorporate practices to diversify commodity offerings that reflect the cultural and dietary needs of clients and require requisite food bank input into state distribution plans.**



Modernize SNAP Eligibility Standards

SNAP has proven to be one of the most effective anti-hunger programs in the United States. In 2021, USDA announced a reevaluation of the benefit mechanism (Thrifty Food Plan) that determines overall monthly household SNAP allocations, resulting in a permanent average benefit increase of more than 21 percent. This modernization led to the most significant benefit increase in program history, and as a result, we believe SNAP eligibility standards should also be updated. The government can modernize eligibility rules to better respond to the needs of groups who are often excluded from participation (as recommended in the Biden Administration's National Strategy on Hunger, Nutrition, and Health):

College Students

In late 2018, the Government Accountability Office estimated that more than 30 percent 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 that eligibility be 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 before its suspension. **We request that this rule be permanently repealed in order for the country to continue investing in a more equitable recovery.**

Permanently Enact the Child Tax Credit

Economic empowerment is a critical step toward ending hunger. The American Rescue Plan temporarily enhanced the federal Child Tax Credit (CTC) for nearly 66 million U.S. children; roughly 90 percent of American children benefited from advance monthly payments enabling parents to afford basic necessities like food. Since March 2021, it is estimated the enhanced CTC will have reduced the number of children experiencing poverty by more than 40 percent. Notably, permanent implementation of the CTC is a chief recommendation in the Biden Administration's National Strategy on Hunger, Nutrition, and Health. **We request Congress that enact the CTC enhancements as a permanent fixture of anti-poverty and anti-hunger interventions.**





Provide Universal Healthy School Meals for All

The National School Lunch and School Breakfast Programs provide critical meals for more than 30 million students at schools nationwide. Pandemic-era waivers expanded these programs to provide universal school meals to students regardless of income. These waivers have since expired, taking meals away from millions of students whose families rely on this critical lifeline. The nutritional, educational, and behavioral benefits of providing healthy school meals for all students are clear; higher test scores, better attendance, proper behavior, reduced illness, and increased well-being can all be correlated with access to healthy meals.

As noted in the [Biden Administration's National Strategy on Hunger, Nutrition, and Health](#), permanent implementation of universal school meals will take more than just food; investing in the school nutrition workforce, kitchen training and equipment, nutrition education, and heavier reliance on local and regional food systems are also integral components to successful implementation. **We recommend that federal lawmakers prioritize healthy school meals for all as a crucial investment in our country's children, education, and food systems.**



Permanently Implement Non-Congregate Feeding and Other Waivers in Out-of-School Programs

Throughout the pandemic, the USDA implemented a host of waivers to allow for safer, more accessible utilization of federal nutrition assistance programs. However, many waivers have since lapsed, despite heightened need. For CAFB, no expiration has been more disadvantageous than that of the non-congregate feeding waiver for after-school and summer meals. The Food Bank operates the Summer Food Service Program and the Child and Adult Care Food Program, both of which provide meals to students in an out-of-school setting and require participating children to eat their meals on-site. With the non-congregate waiver, kids and families were allowed to access meals in a grab-and-go model. This waiver, alongside waivers allowing parent/guardian pick-up and expanded area eligibility, were instrumental to the accessibility of and participation in meals, as well as to the ease of service on the food bank and our partner distribution sites. With the lapse of the non-congregate feeding waiver, children in the food bank's service area have lost an estimated 3,050 meals and snacks each week, and the opportunity to serve meals at unique sites, like libraries and hospitals, is no longer feasible. **We request that Congress act immediately to implement non-congregate feeding and other flexible service options permanently in federal after-school and summer meal programs to allow for more children to access critical out-of-school meals.**



Modernize and Expand Eligibility to Age 6 in the Women, Infants, and Children Program

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. Additionally, and as a priority of the [Biden Administration's National Strategy on Hunger, Nutrition, and Health](#), the USDA will advance a WIC modernization strategy to increase and ease means of participation, such as expanding online shopping and investing in community-based outreach. **We request that Congress close the "WIC gap" by extending eligibility to age 6 and that the USDA continue investing in the program's modernization strategy.**



Strengthen Client and Food Bank Experience Through the Commodity Supplemental Food Program

The Commodity Supplemental Food Program (CSFP) is a federal program administered by the USDA to supplement the diets of low-income seniors over the age of 60. Through the program, the USDA distributes commodity foods and funds to states. States lean heavily on food banks and other nonprofit food-distributing agencies to oversee the delivery and administration of commodities to seniors.

Based on our experience administering the program in multiple states, we recommend that policymakers amend the program to make it more streamlined, accessible, and beneficial for seniors to receive and food banks to serve:

Increase Income Eligibility Threshold

Federal regulation requires that household income must be at or below 130 percent of the federal poverty guideline in order to be eligible to receive CSFP. Unlike other federal nutrition programs such as SNAP and TEFAP, states are not allowed to set CSFP income guidelines higher than the federally established maximum. **We request that the federal government increase the CSFP income threshold to at least 200 percent or greater of the federal poverty guideline and remove the federally established maximum to allow states to set thresholds as high as they see fit to meet their population's need.**

Extend Client Recertification Period

Seniors participating in the program are required to recertify their income eligibility on an annual basis. However, seniors have some of the least variable incomes of any other population in the country; in fact, many rely on fixed incomes that are below the income eligibility threshold for CSFP. Additionally, participants are also required to undergo a reenrollment process every three years to re-apply for the program. **We request that the recertification period for participation in CSFP be extended to three years, in alignment with the reenrollment process.**



Create Federal Investment and Outlets for Home Delivered, Medically Tailored Meals and Groceries

The COVID pandemic has put unprecedented strain on our healthcare and food systems. A poor diet contributes to COVID risks, especially for those with underlying chronic health conditions, and a growing body of research demonstrates that medically tailored meals can be a cost-effective strategy for improving health outcomes. These meals are designed by a registered dietitian or other nutrition professional and delivered to an individual living with a diet-affected disease like diabetes or congestive heart failure. When included in treatment plans for individuals with complex health conditions, these meals have been shown to reduce overall healthcare costs by 16 percent while significantly reducing the need for hospitalizations, emergency department utilization, and emergency transports.

As of 2016, 62 percent of U.S. adults over the age of 65 were living with one or more chronic conditions. Medicare Parts A and B—covering two-thirds of Medicare enrollees—provide no coverage for medically tailored meals. However, most Medicare beneficiaries currently have no access to medically tailored meal services. **We request that Congress pass the “Medically Tailored Home-Delivered Meals Demonstration Pilot Act of 2021” that would establish a Medicare pilot program to address the critical link between diet, chronic illness, and senior health.**



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