



Food Research & Action Center’s Transition Recommendations “This is the Time to Heal in America,” and It Begins With Addressing Hunger

INTRODUCTION

“Hunger today isn’t about scarcity — it’s about a massive failure in leadership. This moment demands an effective leader who can implement bold solutions ...”

— [Biden Campaign Website](#)

Now — with our nation in the throes of the COVID-19 crisis — is the moment for President-elect Biden to lead by building the political and public will to end hunger in America. The dual economic and health crises being driven by COVID-19 have ushered in unprecedented levels of food insecurity and widened the preexisting disproportionate rates among Black, Latinx, and Native American communities.

In his acceptance speech, President-elect Biden laid out key priorities for the nation, including ending the pandemic with its attendant harms to health and the economy, creating a strong economy with jobs that provide a fair wage, bringing the nation together, and addressing the structural racism that has plagued our country for centuries and has contributed to increasing inequality in opportunity, income, and assets. President-elect Biden also has often acknowledged how too many Americans are struggling to put food on the table.

Ensuring that no one in America goes hungry is foundational to health, education, national security, and economic priorities. It is essential that we work towards a more equitable society where there is no limit to what anyone can achieve.

There is a clear pathway for ending hunger in America and important reasons for doing so. Food insecurity is not just morally repugnant, it causes a range of profound harms. It also injures health, learning, productivity, employment, and equality of opportunity.

This document provides a roadmap for the Biden-Harris Administration to address hunger in America. It sets forth the harms of food insecurity, summarizes the strengths of the federal nutrition programs, and concludes with high-priority recommendations for administrative and legislative asks that need to be taken to reduce hunger and poverty.

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THE HARMS OF FOOD INSECURITY

Food insecurity and poverty have serious health repercussions across the lifespan, negatively impacting the ability of children to develop and learn, as well as fueling costly and chronic health conditions, costing the nation many [tens of billions of dollars](#) each year. An explosion of [research](#) has provided more and more evidence that food insecurity is linked to costly chronic diseases and unfavorable medical outcomes, including diabetes, hypertension, poor mental health, iron deficiency, poor disease management, cost-related medication underuse, and increased health care utilization and costs.

Prior to COVID-19, despite a continued period of national economic growth and declining unemployment, tens of millions of people struggled to put food on the table. These unacceptable rates of food insecurity disproportionately hit Black and Latinx households. The [U.S. Department of Agriculture \(USDA\) Economic Research Service](#) reported that in 2019 7.9 percent of White households, 15.6 percent of Hispanic households, and 19.1 percent of Black households struggled with hunger. Additionally, households outside metropolitan areas (more rural areas) are experiencing considerably deeper struggles with food insecurity compared to those in metropolitan areas.

Despite substantial, but ultimately inadequate, government interventions through the Families First Coronavirus Response Act, CARES Act, and other policies, COVID-19 has deepened America's hunger crisis and exacerbated preexisting disproportionate rates. Not surprisingly, those households that lack food access are the same families that face inequities in housing, employment, and education.

FRAC's recent report, [Not Enough to Eat: COVID-19 Deepens America's Hunger Crisis](#), showed that between 26–29 million adults living in the U.S. reported that members of their households sometimes or often did not have enough to eat during the first few months of the COVID-19 pandemic. Other key findings included the following:

- Black and Latinx households, women, and children have been particularly hit hard during the pandemic;
- in 38 states and the District of Columbia, more than 1 in 10 adults with children said they did not have enough to eat;
- more than 1 in 5 Black and Latinx adults with children reported they sometimes or often did not have enough to eat in July 2020 — double that of White and Asian households;
- 28 percent of respondents with incomes below \$25,000 per year reported not having enough to eat, up from 11 percent in 2018;
- 21 percent of those who lost their jobs during the pandemic reported not having enough to eat; and
- workers also experienced a lack of access to food as 13 percent of employed individuals on the financial brink, due to household income losses or expected losses, reported not having enough to eat.

Immediate action, including leveraging the multiple benefits of the federal nutrition programs, can support the growing number of struggling households that are missing out on the nutrition they need for their health and well-being.

THE BENEFITS OF THE FEDERAL NUTRITION PROGRAMS

The federal nutrition programs are among our nation's most important, proven, and cost-effective public interventions, and they must be bolstered if our nation is to eliminate hunger and weather the pandemic. Leveraging the federal nutrition programs to address hunger also supports other Biden priorities that focus on human needs, like affordable health care, child care, and job creation, all of which can bring the nation together.

The Supplemental Nutrition Assistance Program (SNAP), School Breakfast Program, National School Lunch Program, Afterschool Nutrition Programs, Summer Nutrition Program, Child and Adult Care Food Program (CACFP), the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), Older Adult Nutrition Programs, Commodity Assistance, and the Food Distribution Program on Indian Reservations (FDPIR) are widely available interventions to improve the health and well-being of people struggling with hunger and poverty. Tens of millions of people use these programs each year. Because the federal nutrition programs — with the exception of WIC, Older Adult Nutrition Programs, the Nutrition Assistance Program for Puerto Rico, FDPIR, and some of the Commodity Assistance Programs — are entitlement programs, they can readily be scaled up and strengthened to help growing numbers of families put food on the table.

Broad, Bipartisan Support Before and During the COVID-19 Pandemic

Bipartisan support for the federal nutrition programs continues in Congress. This support creates opportunities to help low-income people in ways that may not be available through other policies and programs at federal or state levels. [Food insecurity is not an isolated or concentrated phenomenon](#) in the U.S.; it impacts every state, county, and community. Unfortunately, every member of Congress has constituents who struggle against hunger, and those struggles have only deepened and widened with COVID-19.

Investments in nutrition programs, such as temporary emergency SNAP boosts, the Pandemic Electronic Benefit Transfer (P-EBT) program, and child nutrition waivers, have provided much-needed nutrition assistance, especially for children, during the pandemic, but the response remains inadequate.

Profoundly Important Positive Effects on Health

Not only are the federal nutrition programs proven, effective ways to help struggling families access needed nutrition, a growing body of research demonstrates how [SNAP](#) and the [Child Nutrition Programs](#) have a wide range of positive outcomes for health and development. These programs

- reduce food insecurity;
- alleviate poverty;
- improve dietary intake;
- improve health outcomes;
- protect against obesity;
- improve academic achievement and early childhood development;

- encourage healthier eating; and
- increase family economic security.

The positive health effects of the federal nutrition programs are such that the American Academy of Pediatrics' [Transition Plan: Advancing Child Health in the Biden-Harris Administration](#) includes the following recommendations as part of the section that focuses on [secure families](#):

“Invest in policies and programs we know help lift children out of poverty and improve their health. Federal anti-poverty and safety net programs, including those that provide health care (and access to health care through Medicaid and CHIP), early education (such as Head Start and Early Head Start), quality child care, affordable housing and home visiting, as well as critical nutrition assistance programs, like WIC, SNAP, school meals, and summer feeding programs, must be protected and accessible to all families in need.”

Profoundly Important Positive Effects on the Economy

Economists have long agreed that SNAP is one of America's strongest countercyclical tools. Each \$1 in SNAP benefits during an economic downturn generates between \$1.50 and \$1.80 in economic activity. These effects are felt quickly, as low-income families pay for food locally at grocery stores, farmers' markets, and Community Supported Agriculture (CSA). The positive impacts are felt throughout the food chain, from farmers and food producers to truckers, food retailers, and store employees.

Boosts to SNAP benefits also make a difference for [state and local budgets](#). When people can use SNAP benefits to pay for food, they can use other resources to pay for non-food basics that often are subject to sales tax.

Positive Effects for Military Service Members, Veterans, and Their Families

According to the [2019 Military Family Support Programming Survey](#), 1 in 8 of all respondents (across the nation and overseas) indicated they had trouble getting enough food for their families, and 7.7 percent reported experiencing hunger. Concerns regarding the depth of food insecurity among veterans prompted the Veterans Health Administration to begin [screening millions of veterans](#) each year for food insecurity.

The federal nutrition programs have a long history of support from our military leaders. In response to concerns about how many World War II recruits had been rejected for inadequate nutrition, Congress established the National School Lunch Program “as a measure of national security, to safeguard the health and well-being of our nation's children.” (Section 2, 42 U.S.C. 1751). Fortunately, in addition to school meals, federal nutrition programs, like WIC and SNAP, are available today to support millions of our service members and their families. Strengthening these programs could do even more to protect the health and well-being of our military and to ensure that military service members, veterans, and their families do not have to sacrifice their own nutrition when they are already sacrificing so much for our country.

President-Elect Biden Can Build on His Track Record of Strengthening the Federal Nutrition Programs During Difficult Economic Times

President-elect Biden knows firsthand the importance and efficacy of expanding access to and strengthening [SNAP](#) and the other federal nutrition programs during an economic downturn. The Obama-Biden Administration did just that during the Great Recession with profound results. The temporary increase in SNAP benefits from the American Recovery and Reinvestment Act (ARRA) in 2009 not only reduced food insecurity and the depth of [child poverty by 20.9 percent](#), but it also provided a needed boost to the economy.

As such, the President-elect has already signaled his support for [increasing SNAP benefits](#) and other nutrition programs during the pandemic. In the “Expand Food Relief for Hard-Pressed Families and Children” section of the [Biden Plan to Combat COVID-19 and Prepare for Future Global Health Threats](#), the Biden-Harris Administration lays out strategies to put food on the table:

“Expand Food Relief for Hard-Pressed Families and Children: The Biden Plan calls for a health crisis food initiative that addresses both the depth of potential economic hardship for families and the nature of this health crisis. Economic hardship caused by the crisis will stretch family budgets in ways that could reduce needed nutrition. Many students rely on free or discounted meals at schools, which may have to close. The Biden Plan health crisis food initiative will create a federal-state partnership — fully funded by the federal government — that will expand SNAP relief for the duration of the crisis, as well as broaden the type of food relief responses available to states — from supporting food banks across the nation to increased home delivery of food to a broad effort to replace lost school meals. It will adjust current policies that will harshly cut off or deny food benefits to workers unable to find work in this crisis. It will allow schools to submit waiver applications before they are impacted by the crisis, making it easier for them to get permission to provide food even when school is closed.”

Increasing SNAP benefits and improving access to federal nutrition programs will provide a down payment on efforts to address hunger moving forward. As powerful and effective as the federal nutrition programs are in lifting people out of poverty; improving people’s nutrition, health, and well-being; and stimulating the economy; the programs cannot end hunger alone. Ultimately, food insecurity is driven by poverty, joblessness, low and stagnant wages, insufficient support for people with disabilities, inadequate public income programs, structural racism, lack of affordable housing, and other factors. These issues must be addressed, too.

THE AGENDA TO REDUCE HUNGER AND POVERTY

Given all of these strengths, the incoming Biden-Harris Administration should prioritize a range of strategies to reduce hunger that focuses on strengthening the federal nutrition programs, addressing the root causes of hunger and poverty, and promoting equity.

Strengthen SNAP

SNAP is the nation's most important direct defense against hunger. This critical program improves nutrition, health, and well-being while helping families use mainstream systems of commercial food outlets that stimulate the economy.

Even in the month prior to COVID-19's onset, SNAP was serving nearly [37 million people](#) across the country — children, parents and unemployed and underemployed adults, older adults, people with disabilities, military veterans, and members of the active duty military, among others. [Research](#) demonstrates the effectiveness of SNAP in alleviating poverty; reducing food insecurity; improving the health, nutrition, and well-being of children, adults, and older adults; reducing health care utilization and costs; and stabilizing the economy during downturns. Indeed, each \$1 in SNAP benefits during economic downturns generates between \$1.50 and \$1.80 in economic activity, and it has positive impacts on state sales tax revenues.

Fundamentally, SNAP's structure is sound, but key improvements are needed to strengthen its impact for eliminating hunger and stimulating our economy during COVID-19 and beyond. People with lived experience with hunger and poverty are among the experts who should be engaged with and at the policy table in designing workable solutions regarding SNAP and so many other parts of the federal landscape. Viewing policies through the lens of health and racial equity will also be an important part of having effective policy solutions that are consistent with the Biden-Harris campaign commitments.

SNAP Administrative Asks

The Biden-Harris Administration immediately should rescind all harmful SNAP rules that change, terminate, impede, or undercut access to SNAP. The key rules that need to be addressed by administrative regulatory action and/or steps in litigation are as follows:

- **SNAP Final Rule** that limits state flexibility to protect certain adults in areas with insufficient jobs who do not document sufficient hours of work or other qualifying activities from a SNAP benefits [three-month time limit](#). Even prior to COVID-19, USDA itself estimated the rule would throw nearly 700,000 adults off of SNAP after three months. While litigation in the U.S. District Court for D.C. has halted that rule, the Trump Administration has continued to oppose the court order. Furthermore, in SNAP and other public benefits programs, such rules should be discussed as a “work reporting rule,” rather than “work requirements,” because the latter implies an individual's willingness to work, which is not relevant for the arbitrary time limit.

- **SNAP Proposed Rule** that [would undermine states' Broad-Based Categorical Eligibility \('Cat EI'\) option](#) to get SNAP to more people working their way up the economic ladder. By USDA's pre-COVID-19 estimates, the rule would eliminate SNAP benefits for 3.1 million individuals and jeopardize free and reduced-price school meals for 1 million children.
- **SNAP Standard Utility Allowance (SUA) Proposed Rule** that would make it harder for tens of thousands of people to afford to heat and eat. By USDA's pre-COVID-19 estimates, that rule would cut SNAP benefits by \$4.5 billion over five years.
- **SNAP Emergency allotments** authorized by the Families First Coronavirus Response Act have not been provided to nearly 40 percent of SNAP households because of USDA's interpretation of that statute and USDA's active opposition to legal challenges to that interpretation. The Biden-Harris Administration should move quickly to revise the current policy and drop the opposition to legal challenges that allow emergency SNAP relief for all SNAP households during COVID-19.
- Additionally, the **public charge rule** that requires consideration of an individual's SNAP participation as a factor in a public charge determination should be rescinded and opposition to court challenges to it abandoned. The public charge Final Rule has instilled fear and confusion that deters immigrant families, particularly families of color and low-income families, from accessing SNAP and other nutrition programs.

USDA can take a range of other SNAP administrative actions to mitigate food hardship and bolster the economy during COVID-19 and beyond. These include leveraging Disaster SNAP (D-SNAP) tools, not only to respond to natural disasters, but also to respond to COVID-19 and any future pandemic. COVID-19 emergency declarations at federal and state levels remain in place across the country, and Declarations of Individual Assistance are available to leverage some benefits, but, so far, not D-SNAP benefits. The Biden-Harris Administration should approve pending and subsequent state requests to implement D-SNAP as a response to COVID-19 conditions. These D-SNAP tools include temporary benefits for people not already participating in SNAP, replacement and supplemental SNAP benefits for those participating in SNAP, hot prepared food waivers, and other flexibilities that adapt SNAP rules during disaster recovery.

Another recommended action is to increase access to SNAP benefits by investments in outreach, application assistance, and technology support. These will be especially helpful for groups and areas of the country where SNAP-eligible people remain unenrolled. Grant opportunities, enhanced administrative funding streams, and technical assistance and guidance from USDA can help move the needle significantly on SNAP benefit access.

In addition, the Biden-Harris Administration should protect against any unintended spillover effects of relief that might undercut eligibility for SNAP eligibility, such as Pandemic Unemployment Compensation or any related overissuances for which later restitution claims would be applicable.

Finally, USDA should make the best use of the SNAP funding streams available, including for SNAP outreach, SNAP Nutrition Education, and SNAP Employment and Training.

SNAP Legislative Asks

- **Boost SNAP benefits to improve participants' health and stimulate the economy.** SNAP benefits do not provide most SNAP households with enough resources to purchase an adequate diet throughout the month. For the duration of COVID-19 and its economic dislocation, the federal government should, as the Obama-Biden Administration and Congress did via ARRA in 2009, enact increases to SNAP benefits. The HEROES Act that the Biden-Harris campaign endorsed would make temporary increases in SNAP maximum benefits by 15 percent and monthly minimum SNAP benefits from \$16 to \$30. ARRA SNAP boosts proved effective both in promoting food security during the depths of the Great Recession and also in hastening the economic recovery that ensued. The Biden-Harris Administration should work with Congress to address any cliff effects when such temporary boosts terminate and when Families First Emergency SNAP allotments end.
- **SNAP benefit increases are needed on a permanent basis.** The Low Cost Meal Plan should replace the outdated Thrifty Food Plan as the basis for calculating SNAP benefits. Closing the Meal Gap bills do that, and other improvements in SNAP benefits have been offered in the Senate by Vice-President Elect Harris (S. 3719) and in the House by Representative Adams (D-NC) and 118 cosponsors (H.R. 1368). USDA also has administrative pathways that could result in a more adequate basis for SNAP benefits, including during 2021–2022 when it conducts the 2018 Farm Bill-mandated review of the Thrifty Food Plan.
- **Other S. 3719 and H.R. 1368 improvements** include eliminating the cap on the SNAP shelter deduction that would help families with children, increasing the SNAP minimum monthly benefit, and making more widely available the SNAP Standard Medical Deduction for older people and people with disabilities.
- **Eliminate Arbitrary Eligibility Barriers and Technology Barriers to SNAP Access.** Arbitrary and harsh eligibility rules undercut access for many people who are struggling to make ends meet, have disparate impacts on particular groups, and are exacerbating racial and health inequities during COVID-19.
 - While there is a temporary suspension of the SNAP time limit during the COVID-19 public health emergency, that should be made permanent.

- The special rules that prevent many otherwise income-eligible college students from qualifying for SNAP also should be suspended during COVID-19 and lifted permanently.
- As the Biden Plan for Black America recommends, the federal lifetime ban on SNAP benefits for convicted drug felons should be eliminated. The Biden-Harris Administration should promote policies and practices to help all previously incarcerated people who are making a fresh start to be able to access SNAP benefits.
- The five-year bar that disqualifies many lawful permanent residents from receiving SNAP should be rescinded.
- Native and Indigenous communities should be allowed to access SNAP and FDPIR without having to choose only one.

Improve Access Points for SNAP Customers to Obtain Food

The Restaurant Meals Program (RMP) should be expanded to enable more SNAP participants who are 60 years and older, have disabilities, or are homeless to use SNAP to purchase meals from approved restaurants. During COVID-19 and future pandemics, RMP should be allowed for all SNAP participants. This also would assist the restaurant sector that has been hit so hard during COVID-19. Also, as mentioned earlier, USDA should make greater use of hot prepared food waivers.

Forty states have enrolled in an [online purchasing pilot](#) that allows SNAP participants to purchase groceries from eligible retailers and have them delivered to areas with low access to quality foods. More online services are essential for low-income people who have limited mobility (e.g., older adults or people who rely on public transportation) or may not be able to easily access food retail outlets (i.e., “food deserts”).

Invest in Technology and Other Administrative Supports to Promote SNAP Benefit Access

State administration of SNAP is underfunded. Since 1998, most states receive less than 50 percent reimbursement of the costs for SNAP administrative operations. This has undercut their capacity, including for SNAP technology improvements. The Biden-Harris Administration should seek ways to provide greater support, including in any infrastructure package to provide enhanced match-funding for SNAP technology and application assistance initiatives. Such investments may be part of a cross-program strategy to improve access to a range of program support for low-income people. A good example is the approach under the Affordable Care Act (ACA), which provided a 90/10 match for technology, and for which the Obama-Biden Administration OMB allowed a revision to normal cost allocation rules, to allow SNAP technology investments related to ACA technology to benefit from the same enhanced funding match. Such investments can be particularly helpful for underserved areas, including rural areas and other areas with transportation challenges. Enhanced funding streams for SNAP outreach, including for technology support for community group partner application assisters, can help get more eligible people connected with SNAP during COVID-19 and beyond.

Strengthen the Child Nutrition Programs

The child nutrition programs (school lunch and breakfast, afterschool meals and snacks, summer food, WIC, and child care food) are central and essential tools for ending childhood hunger and ensuring positive educational outcomes. These proven programs reduce poverty, prevent obesity, strengthen schools and child care programs, and boost children's health, development, and school achievement. They are among our nation's most important and cost-effective public interventions, and they play an important role as the country recovers from the pandemic. In order to ensure that children can access the benefits of these programs, these programs must be bolstered in important ways.

Child Nutrition Programs: School Nutrition Programs

The School Breakfast Program and the National School Lunch Program provide nutritious meals that support academic achievement, better attendance, and improved student behavior in addition to reducing childhood hunger. Before COVID-19, approximately 22 million children receive free or reduced-price school lunch on an average school day, with school breakfast reaching just over half of the low-income students who participate in school lunch. These programs have tremendous educational benefits and should be protected and strengthened.

School Nutrition Programs Administrative Asks

The Biden-Harris Administration could take a number of steps to ensure access and encourage the reach of the School Nutrition Programs.

- **Explore additional opportunities to expand direct certification** through Medicaid and other programs through its demonstration authority. Direct certification has been a game changer for the School Nutrition Programs by linking eligible children to free school meals, reducing administrative work for school districts, and improving program integrity. The expansion of Medicaid Direct Certification through USDA's demonstration authority during the Obama-Biden Administration has successfully certified millions of additional eligible children for free and reduced-price school meals. Additional states could be added to the Medicaid Direct Certification demonstration, and the demonstration could be expanded to allow direct certification for additional programs to be evaluated. The Biden-Harris Administration also can work with states to improve and expand direct certification for SNAP, FDPIR, and children who are in foster care or who are homeless or migrant.
- **Launch an aggressive campaign to expand the use of the Community Eligibility Provision (CEP)**, which has allowed more than 30,000 high-poverty schools to offer free breakfast and lunch to all students, but more than 44,000 were eligible for the provision in the 2020–2021 school year. The number of eligible schools has likely only grown during the pandemic. The administration could include extending the community eligibility deadlines. The extension of the April 1 deadline, to set a school's Identified Student Percentage, and the June 30 deadline, to adopt community eligibility for the 2020–2021 school year, were critical to supporting more schools adopting community eligibility. Technical assistance and promotion are also needed to make it more widely implemented.

- **Use USDA’s authority to extend nationwide waivers through September 30, 2021.** The waivers that allow the School Nutrition Programs to operate during a pandemic are set to expire on June 30, 2021. Schools will need these waivers to support program operations through the fiscal year, and any delay in extending them will create confusion and unnecessary concern.
- **Develop and nurture a close partnership with the U.S. Department of Education.** This partnership would help facilitate communications with schools on the promotion of best practices to ensure access to school breakfast and lunch, including adopting innovative school breakfast models, e.g., breakfast in the classroom, and implementing community eligibility.
- **Issue guidance to better address unpaid school meal fees.** School districts are currently required to have a policy, but there are no federal protections for children. The new policy should eliminate any overt identification of children with unpaid school meal fees, and schools should not be allowed to take back food that has already been served to a child. In addition, the work referenced above on community eligibility and direct certification can play an important role in helping to reduce or eliminate school meal debt.
- **Support innovation in school meals programs.** School breakfast serves just over half of the low-income children who participate in school lunch. Breakfast in the classroom and other innovative service models increase participation, making them ideal policies to adopt to ensure every child has the nutrition needed to learn and thrive throughout the school day. Children should be given adequate time to eat breakfast and lunch, which means they should not be rushed to eat or challenged by long lines and short meal periods, or squeezed out of overcrowded lunchtime cafeterias. Cafeteria construction and renovation should be part of the school infrastructure initiative. USDA should do more to enforce federal rules that potable water be available during school meals.
- **Protect and restore the nutrition standards for school meals and other food sold in school.** Healthy school meals are especially important for low-income children who are vulnerable to poor nutrition because of risk factors associated with poverty, including stretched family resources, limited access to healthy and affordable foods, fewer opportunities for physical activity, and greater exposure to obesity-related marketing. Given all of these challenges, providing healthy school meals, limiting unhealthy “competitive foods” in schools, and ensuring a healthy school mealtime environment play important roles in improving the health of low-income children. The most recently proposed rule once again attempts to undermine the healthy meal standards and offers an inadequate time period to respond. The Biden-Harris Administration can take action to get the regulatory process back on track and to focus on the newest Dietary Guidelines for Americans in order to inform healthy nutrition standards. Research shows that the new nutrition standards (prior to the rollbacks by USDA) have had a positive impact on the school nutrition environment, as well as student food selection and consumption, especially for fruits and vegetables.

School Nutrition Programs Legislative Asks

- **Provide school breakfast and lunch at no charge to all students.** The creation of CEP in the Healthy Hunger-Free Kids Act of 2010 has allowed 1 in 3 high-poverty schools to offer free meals to all students. As a result, it has highlighted the value of the approach: all affected students have access to the nutrition they need to succeed in school; less administrative work for school districts; and no unpaid school meals fees. The Biden-Harris Administration has the opportunity to build upon this work by creating a broad vision for universal school meals legislatively. Community eligibility can be used as a vehicle to increase the number of schools offering school meals by increasing the multiplier that determines the school's federal reimbursement to allow more schools to adopt community eligibility. The upcoming child nutrition reauthorization offers an important opportunity to provide free school meals for all.
- **Legislation could allow additional groups of low-income children to automatically receive free school meals,** such as those who have been impacted by the drug and opioid epidemic and are being raised by their grandparents, those who receive Supplemental Security Income (SSI), or those who live in households that participate in the Low-Income Home Energy Assistance Program (LIHEAP).

Because community eligibility uses the percentage of students who are certified for free school meals without an application to determine whether or not a school is eligible and its level of federal reimbursement, these efforts will allow more schools to implement community eligibility in addition to ensuring that our most vulnerable children have access to free school meals.

Out-of-School Time Programs

Afterschool and summer nutrition programs provide nutritious meals to children after school, on weekends, and during school holidays and vacations at sites in low-income communities. The meals help draw children into educational and enrichment programs, and these programs will be critical equity supports as the nation recovers from the pandemic. Afterschool and summer meals reach only a small portion of the low-income children who participate in school lunch, which means that food insecurity goes up during the summer and children miss out on nutritious meals after school, on weekends, and during school holidays.

Out-of-School Time Programs Administrative Asks

- **Use USDA's authority to extend nationwide waivers through September 30, 2021.** The waivers that allow afterschool and summer nutrition programs to operate during a pandemic are set to expire on June 30, 2021. Community-based organizations, local government agencies, and schools will need these waivers to support program operations throughout the fiscal year, and any delay in extending them will create confusion and unnecessary concern.

- **Update the nutrition standards for the Summer Food Service Program**, which is the only federal child nutrition program that operates under nutrition standards set *decades* ago.
- **Work with the U.S. Department of Education and the U.S. Department of Health and Human Services** to bolster the connection between federal funding for afterschool and summer programs and the use of the afterschool and summer meal programs.

Out-of-School Time Programs Legislative Asks

- **Expand access to nutrition in afterschool and summer programs.** These programs are built on afterschool and summer programming, which will be critical as the nation responds to the educational impact that COVID-19 has had on children, particularly low-income children. By combining a large federal investment in afterschool and summer programs with critical improvements, the nutrition programs will support educational equity as well as combat childhood hunger and improve nutrition.
- **Streamline the afterschool and summer nutrition programs** to help increase and expand children's access to meals when school is not in session. For example, schools should be able to provide suppers after school through the school nutrition programs instead of being required to operate CACFP; and summer food sponsors should be able to feed children year-round. In addition, the area eligibility test for afterschool and summer meal sites is 50 percent, and it leaves out too many communities, particularly rural and suburban. The pandemic has highlighted the barrier that this threshold creates, and USDA waived the test so that all communities could provide meals through afterschool and summer nutrition programs. This approach should become standard practice. Start-up grants and transportation grants (especially for programs in rural areas) are also essential.
- **Provide Summer EBT cards to low-income families.** The limited reach of the summer nutrition programs highlights the need for an approach to combat food insecurity, which goes up during the summer when school meals are not available to children who rely on them during the school year. Evaluations of Summer EBT and initial research on P-EBT (which provides the value of school meals on an EBT card to families who lost access to free or reduced-price school meals due to school closures related to COVID-19) shows that this approach helps minimize food insecurity. The program also could provide benefits to cover the meals that families lose access to on school holidays and breaks.

Child Nutrition Programs: Early Childhood

The Child and Adult Care Food Program (CACFP) and the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) are crucial nutrition supports for families with young children. FRAC urges the Biden-Harris Administration to take the following administrative and legislative actions to strengthen program access and support participation by underserved children and communities, ensure nutritional

quality, and simplify program administration and operation. These actions should maintain and build upon the critical gains and lessons learned from the success of flexibilities that have been offered during COVID-19.

CACFP

Strengthening CACFP as a vital support for families and caregivers during COVID-19 and in the future is fundamental to the success of President-elect Biden's commitment to the caregiving workforce ([THE BIDEN PLAN FOR MOBILIZING AMERICAN TALENT AND HEART TO CREATE A 21ST CENTURY CAREGIVING AND EDUCATION WORKFORCE](#)).

CACFP helps provide nutritious meals and snacks for eligible children and elderly or disabled adults who are enrolled at participating child care centers, family child care homes, afterschool programs, Head Start programs, adult care centers, and homeless shelters. CACFP ensures that children start good nutrition habits early in life, grow healthy and strong, and are prepared for school by being ready to learn. The program plays a vital role in improving the quality of child care and making it more affordable for many low-income families.

CACFP Administrative Asks

- **Streamline program requirements, reduce paperwork, and maximize technology** to improve program access. This will improve CACFP's ability to reach low-income families and can be accomplished by implementing the following recommendations (which are consistent with the USDA Paperwork Reduction Work Group's [Report to Congress: Reducing Paperwork in the Child and Adult Care Food Program](#)):
 - modernize applications, eliminate enrollment forms, and expand the use of direct certification to all states;
 - support sponsoring organizations' ability to mediate and fix problems through improvements to the serious deficiency process;
 - expand the appeals process to resolve disputes over state-specific requirements;
 - simplify the use of expansion funds for rural and low-income areas; and
 - for fiscal year 2021, allow increased flexibility for carry-over funds.

CACFP Legislative Asks

- **Provide emergency funding to CACFP sponsors, centers, homes, and afterschool programs** to help cover operating-cost deficits that were created by shutdowns, as well as a shift in services, which occurred during COVID-19. This important provision in the HEROES Act is crucial to maintaining the infrastructure and financial viability of program operators and administrators. Since the onset of the COVID-19 pandemic, CACFP meal reimbursements have decreased significantly. Based on FRAC's analysis of the most recent USDA data available, child care providers received \$92.0 million fewer dollars (-29.4 percent) in April 2020 compared to April 2019 ([The Child and Adult Care Food Program Participation and Reimbursement During COVID-19](#)). Child care

providers and sponsors are losing reimbursements that are needed to support fixed costs; this loss contributes to deficits in already overburdened child care budgets and creates instability in the infrastructure for providing child care.

- **Allow child care centers and homes the option of serving an additional meal (typically a snack or supper), as was previously allowed.** Many children are in care for more than eight hours per day as their parents work long hours to make ends meet, so they rely on child care providers to meet a majority of the children's nutritional needs. Previously, child care providers could receive funding for up to three meals and one snack per day. CACFP support should be restored to the full complement of meals that young children need, and to stop short-changing young children at a time when they, and their families, can least afford it.
- **Allow annual eligibility for proprietary (for-profit) child care centers.** Proprietary child care centers are eligible to participate in CACFP if at least 25 percent of the children they serve are living in low-income households. Unfortunately, USDA requires these child care centers to document institutional eligibility *every month* rather than the annual eligibility allowed for other centers and homes. This creates unnecessary and substantial paperwork and administrative burdens. Many of these child care centers are small, independent operations that provide much-needed care and afterschool programs to low-income children in underserved areas.
- **Reduce the CACFP area eligibility test from 50 percent to 40 percent to streamline access to healthy meals for young children in child care.** Area eligibility, the most successful and inclusive CACFP eligibility mechanism, allows family child care homes in low-income areas to automatically receive the highest CACFP reimbursement rates. This "area eligibility" test needs to be expanded to reach more low-income families in rural, suburban, and other areas.
- **Create a CEP for child care centers participating in CACFP.** Child care centers should be allowed to participate in CACFP without collecting income applications or enrollment forms. CEP relies on direct certification and categorical eligibility to establish a claiming percentage instead of income from income applications. This has been a successful mechanism in low-income schools.

WIC

WIC provides low-income nutritionally at-risk pregnant women, postpartum mothers, infants, and children up to 5 years old with nutritious foods, nutrition education, breastfeeding support, and referrals to health care. Strengthening and expanding the WIC program will support the success of President-elect Biden's agenda for women ([THE BIDEN AGENDA FOR WOMEN](#)).

Research shows that WIC improves participants' health and well-being, dietary intake, and birth and health outcomes; protects against obesity; and supports learning and

development. WIC benefits are cost-effective, generating major savings in federal, state, local, and private health care, as well as special education costs. Studies demonstrate that WIC improves the food and economic security of participants by reducing food insecurity, helping to alleviate poverty, and supporting economic stability.

WIC Administrative Asks

- **Make permanent the flexibilities that allow for remote enrollment, services, and benefits issuance, and the facilitation of online ordering.** It is time to modernize and streamline the WIC program to enhance the WIC experience. It will be important to use the lessons learned from the success of the flexibilities that were offered through WIC waivers during COVID-19. Parents across the country are universally positive about being able to have WIC enrollment and services via phone, and remote benefit issuance. The successful waiver (dropping the requirement for in-person WIC clinic visits) has allowed participants to complete enrollment and education appointments from a convenient location over the phone. Far less common options for services have included video chats and telehealth systems. USDA should accelerate the progress made toward facilitating online ordering during COVID-19. Online ordering systems help WIC participants easily and conveniently choose the right nutritious WIC foods and avoid embarrassing mix-ups during the check-out process.
- **Fund comprehensive WIC outreach and coordination,** including establishing a WIC community partners outreach program and an initiative to coordinate data in the health care and WIC sectors through technology.
 - Establishing a WIC community partners outreach program, patterned on the successful [SNAP outreach program](#), would fund WIC state agencies to contract with non-WIC community partners to conduct WIC outreach. Effective outreach by community partners can broaden the reach and effectiveness of WIC, which can help overcome barriers to WIC participation, including widespread misconceptions about eligibility, concerns expressed by immigrant families, and limited access to information about WIC benefits and how to apply. WIC outreach needs to serve an increasingly culturally and linguistically diverse population and the new generation of tech-savvy mothers.
 - An initiative to coordinate data in the health care and WIC sectors through the use of technology will pay dividends. It is absolutely essential to streamline the current and often arduous options (fax or fillable PDFs) for health care providers to give patient's health information to WIC. This will help families enroll and maintain participation in WIC by using the assessments (e.g., heights and weights) and blood tests (e.g., for anemia) already completed by their health care providers. In addition, data matching between Medicaid and WIC can be used as an outreach tool to successfully identify eligible but not participating families, and to streamline the income-eligibility process for parents.

- **Update the WIC food package to be consistent with the 2020–2025 Dietary Guidelines for Americans, and maintain the scientific integrity of the WIC food package process.** The WIC food packages were revised in 2007 to align the authorized foods with the latest nutrition science at the time. Research shows that the revised WIC food packages have favorable impacts on dietary intake, breastfeeding outcomes, and obesity rates. In addition, studies suggest an important role for the WIC food package in improving neighborhood food environments, which benefits low-income communities. The new food package revisions should be consistent with the new Dietary Guidelines and National Academy of Science recommendations, including increasing the value of the fruit and vegetable benefits and investing significantly in the children's package.

WIC Legislative Asks

- **Extend WIC certification periods to two years and enrollment for children until their sixth birthdays.** Extending WIC certification to two years will support the health of mothers and children with much-needed WIC benefits, healthy food, nutrition counseling, and referrals to services. The mothers and children who are eligible for the extension struggle with food insecurity and poverty — two conditions that make it difficult to maintain good health, nutrition, and overall well-being. The extension of certification periods and eligibility will help to retain families in WIC, which has been a challenge.

Strengthen Additional Anti-Hunger Programs

Commodity Assistance Programs

Emergency food providers, food banks, and charitable organizations agree that SNAP is the most efficient and effective way to address domestic food insecurity. For every meal provided by the Feeding America network of food banks, SNAP provides nine. In addition to program support for SNAP and the Child Nutrition Programs, commodity assistance programs help fill the gap for families struggling against hunger. Congress has also provided COVID-19 commodity relief through a variety of programs, including through Section 32 and other appropriated programs. These programs will soon expire or funding may be dramatically reduced, which would create a “commodity cliff” for many of our nation's food banks and emergency food providers. Below are just some of the actions that would support commodity assistance programs.

- Increase program funding for **The Emergency Food Assistance Program (TEFAP)**. Nutritious TEFAP commodities are an essential resource for food banks. This year, as the demand for emergency food reaches epic proportions, a reliable and steady stream of nutrient-dense TEFAP commodities is urgently needed. Enhanced TEFAP funding by Congress in COVID-19 relief legislation was critical to help alleviate some of the increased need. As the health and economic fallout from the pandemic continues, additional funding and support for TEFAP is needed in 2021.
- The **Commodity Supplemental Food Program's (CSFP)** nutritious monthly food packages play an important role in addressing the nutritional needs

and combating the poor health conditions often found among low-income older adults who are experiencing food insecurity. CSFP caseloads must be protected and maintained moving into 2021 as the demand and need for food assistance during COVID-19 has grown for this population.

- **FDPIR** is an essential food assistance program that has seen substantial increases in new participants throughout the pandemic. While the CARES Act provided additional funding for FDPIR infrastructure and food purchases, additional administrative flexibilities are still needed for the tribal governments that manage these programs, including the certification and verification of new participants; delivery and packing options; and in allowing local procurement of foods that are traditionally and culturally appropriate for FDPIR. In addition, as mentioned in the [SNAP](#) section, Native and Indigenous communities should be allowed to access SNAP and FDPIR without having to choose only one.

Older Adult Nutrition Assistance Programs

President-elect Biden has signaled his dedication to protecting older Americans, particularly their health ([THE BIDEN PLAN FOR OLDER AMERICANS](#)). [Investing in the nutrition of older adults is a research-backed way to improve health](#). Efforts to increase SNAP access and benefits levels for older adults are essential to improving the nutrition, health, and independence of older adults. These vital programs serve more than 5 million households with a person age 60 and older. The [SNAP](#) section includes additional recommendations that would help older adults, including improvements in the minimum benefit, the Standard Medical Deduction, and the Restaurant Meals Program.

In addition to investments in CSFP, investments in the congregate meals and home-delivered meals programs, which are authorized through the Older Americans Act, are key. The home-delivered meals program and congregate nutrition program, which reached in 2018 more than 870,000 and more than 1.52 million older adults, respectively, are important sources of meals for older adults in many communities around the country. However, funding has remained essentially flat, which has prevented the programs from being able to keep up with the escalating demand for services.

Increased funding is needed for the Older Americans Act nutrition programs. The Biden-Harris Administration should promptly implement the provision of the 2020 Older Americans Act that calls for malnutrition screening for older adults and for connecting older adults to nutrition programs, including SNAP.

Address the Root Causes of Hunger

Investments must be made to address the root causes of hunger and poverty, such as structural racism, if our nation is to end hunger and recapture the soul of America. Families and individuals are working hard, but face numerous challenges outside their control, and these obstacles drive up rates of poverty and hunger. As effective as the nutrition programs are, they cannot end hunger alone when employment falls short,

growth is not shared in an equitable way, and people lack access to housing, health care, sufficient disability benefits, and other needed support systems.

President-elect Biden has already signaled his commitment to prioritizing the following investments that FRAC has identified among the most critical investments to address hunger:

- **create jobs with better wages for low-income workers;**
 - President-elect Biden has committed to “building back better” with an “updated social contract that treats American workers and working families as essential at all times, not just during times of crisis, with higher wages, stronger benefits, and fair and safe workplaces” ([BUILD BACK BETTER: JOE BIDEN’S JOBS AND ECONOMIC RECOVERY PLAN FOR WORKING FAMILIES](#));
- **improve and expand refundable tax credits for low-income families;**
 - President-elect Biden has committed to “Expand the Child Tax Credit to help families through the [COVID-19] crisis” as well as longer-term improvements ([A TALE OF TWO TAX POLICIES: TRUMP REWARDS WEALTH, BIDEN REWARDS WORK](#)); and to “Expand the Earned Income Tax Credit (EITC) to older workers. The EITC is one of the most effective strategies for helping low-wage workers achieve a living wage” ([THE BIDEN PLAN FOR OLDER AMERICANS](#));
- **protect and improve Social Security, Supplemental Security Income (SSI), and pensions for low-income older adults and people with disabilities;**
 - President-elect Biden has committed to “preserve and strengthen Social Security” which is the “the bedrock of American retirement” ([THE BIDEN PLAN FOR OLDER AMERICANS](#)), as well as “to protect the economic security of people with disabilities and increase employment opportunities, Biden will take a holistic approach to SSI, Social Security Disability Insurance (SSDI), Medicaid, and other programs to support people with disabilities” ([THE BIDEN PLAN FOR FULL PARTICIPATION AND EQUALITY FOR PEOPLE WITH DISABILITIES](#));
- **improve other income supports, including affordable housing and health care;**
 - “every American in every zip code should have access to housing that is: affordable ... [and] stable” ([THE BIDEN PLAN FOR INVESTING IN OUR COMMUNITIES THROUGH HOUSING](#)), and to “ensure health care is a right for all, not a privilege for just a few” ([HEALTHCARE](#)).

In pursuing this agenda to create opportunity for all, FRAC urges the Biden-Harris Administration to highlight not only its effects in job creation, health access, affordable housing, and poverty alleviation, **but its anti-hunger impacts as well.**

Promote Equity

President-elect Biden has already pledged that “As President, he will pursue a dedicated agenda to close the racial wealth gap, to expand affordable housing, to invest in Black, Latino, and Native American entrepreneurs and communities, to advance policing and criminal justice reform, and to make real the promise of educational opportunity regardless of race or zip code” ([BUILD BACK BETTER: JOE BIDEN'S JOBS AND ECONOMIC RECOVERY PLAN FOR WORKING FAMILIES](#)).

Successfully addressing hunger in the U.S. includes ensuring that anti-hunger priorities and strategies focus on populations struggling the most, including children, women, people with disabilities, immigrants, older adults, LGBTQ+ people, struggling veterans, returning citizens, people experiencing homelessness, and people residing in rural areas. Black, Latinx, Native American, and Asian and Pacific American households have faced a long history of structural racism that has contributed to disproportionate rates of food insecurity that must be addressed head-on through equitable policies if we are to end hunger in America. It is essential to center the work to address hunger on policies and strategies that most effectively support the groups that are at the highest risk of food insecurity.

Below are some examples of actions that can help abate the disproportionate rates of food insecurity:

- **provide immigrants nutrition program benefits and other basic needs supports;**
 - President-elect Biden has committed to “Reverse Trump’s public charge rule” ([THE BIDEN PLAN FOR SECURING OUR VALUES AS A NATION OF IMMIGRANTS](#)), which would be an essential starting point;
- **improve data collection protocols to capture food insecurity and nutrition program participation rates for people at disproportionate risk;**
 - President-elect Biden has recognized the essential role of data to more fully identify and address inequity, including data on sexual orientation, gender identity, race, and ethnicity; ([THE BIDEN PLAN TO ADVANCE LGBTQ+ EQUALITY IN AMERICA AND AROUND THE WORLD](#); and [THE BIDEN PLAN TO BUILD BACK BETTER BY ADVANCING RACIAL EQUITY ACROSS THE AMERICAN ECONOMY](#));
- **ensure that the federal nutrition programs provide opportunities for the greatest impact and justice for Native American communities;**
 - President-elect Biden has signaled that he will “expand access to healthy foods, while also promoting tribal self-governance” ([BIDEN-HARRIS PLAN FOR TRIBAL NATIONS](#)).

CONCLUSION

The incoming Biden-Harris Administration should give high priority to a range of strategies and recommendations to reduce hunger by expanding and strengthening the federal nutrition programs and investing in other human needs programs that address the root causes of hunger.

A substantial majority of Americans need help at some point to stave off hunger and the other deprivations of poverty. Poverty is a common experience in America; the population of those struggling is not static. They are of all races and ethnicities in all regions of the country, working in many occupations, espousing all political beliefs, and facing a wide variety of struggles and setbacks. The long-term fallout of COVID-19 only will deepen poverty and hunger across the country.

There is no excuse for leaving hungry people in America behind. There is a clear path for eliminating hunger in this country and for creating a healthier, more prosperous, and more equitable society where all people and communities are able to thrive.

President-elect Biden and Vice President-elect Harris can lead us on this path, with FRAC supporting these efforts every step of the way.