

Campaign for a Hunger-Free New York Public Policy Priorities for 2019

Hunger Solutions New York is a statewide non-profit organization dedicated to alleviating hunger. We are a caring and informed voice for hungry New Yorkers. We promote:

- Awareness of hunger in your community;
- Awareness of programs that address hunger;
- Full participation in federal nutrition assistance entitlement programs for all who are eligible;
- Public policies that contribute to ending hunger; and
- Public awareness of the economic, social, health, and educational benefits of nutrition assistance programs.

These efforts improve the health and well-being of New Yorkers while boosting local economies across the state.

Hunger Solutions New York maintains that it is a governmental responsibility to ensure that all New Yorkers are able to secure adequate food and nutrition. While New York's public policy response to hunger includes a number of federal and state nutrition assistance programs, many New Yorkers still struggle with hunger – 10.7% according to USDA (USDA, 2018) - striking at the heart of New Yorkers' health and well-being. Hunger Solutions New York regards this as an unacceptable reality and presents its public policy agenda to improve the nutrition assistance safety net.

FEDERAL PRIORITIES

Supplemental Nutrition Assistance Program (SNAP): The nation's largest federally-funded nutrition assistance entitlement program must be protected, strengthened and streamlined to maximize its impact on hunger. New efficiencies and the provision of adequate resources will enable the program to meet the needs of struggling individuals and families and preserve SNAP's ability to respond in times of economic downturn or disaster. Through legislation and USDA administrative changes, action can and should be taken to:

1. Maintain the core principles and integrity of SNAP:
 - a) Monitor and respond to rule-making for the 2018 Farm Bill.
 - b) Keep intact the federal commitment to pay 100% of SNAP benefits.
 - c) Ensure that states are not allowed to privatize SNAP or remove SNAP's merit staffing requirement.
 - d) Do not expand SNAP's work requirements to new populations, impose stricter requirements or impose more harsh penalties.
 - e) Ensure that fees are not imposed on retailers who accept SNAP.
2. Expand the number of people who are eligible to participate in SNAP:
 - a) Maintain state flexibility to utilize "expanded categorical eligibility" to waive the asset test and set gross income tests.
 - b) Prevent further restrictions to ABAWD time limit rule (i.e., prevent adding new populations, tightening requirements, or limiting state flexibility to issue waivers).
 - c) Retain the long-standing definition of Public Charge as it relates to SNAP and other nutrition assistance programs.

- d) Clarify the legal definition of the military's Basic Allowance for Housing so it will not be counted as income when determining eligibility for SNAP.
3. Maintain and increase the adequacy of benefits provided through SNAP:
- a) Improve the adequacy of monthly SNAP allotments by using USDA's Low Cost Food Plan in place of the Thrifty Food Plan when calculating SNAP benefit amounts.
 - b) Maintain minimum benefit allotments.
 - c) Prevent the imposition of a cap on benefit allotments for larger households.
 - d) Maintain state flexibility to provide a nominal LIHEAP benefit to the neediest low-income households, in order to maximize benefit allotments.
 - e) Maintain state flexibility to determine and set annual Standard Utility Allowances.
 - f) Allow all SNAP households to deduct their actual shelter costs as part of SNAP budgeting.
 - g) Implement a Standard Medical Deduction.
 - h) Maintain food choice for SNAP recipients, and prioritize incentives to purchase more produce.
 - i) Ensure that SNAP recipients can use their EBT cards at Farmers Markets using a cellular-based redemption system.

Child Nutrition Programs: The core principles and integrity of child nutrition entitlement programs, specifically the National School Lunch Program (NSLP), School Breakfast Program (SBP), Summer Food Service Program (SFSP), and Child and Adult Care Food Program (CACFP), should be maintained, and any effort to limit program effectiveness and resources through block-granting should be rejected. The core principles and integrity of the Special Supplemental Nutrition Program for Women, Infants and Children (WIC) should also be maintained. Through federal administrative and legislative changes, action can and should be taken to:

- 1. Reauthorize Child Nutrition and WIC programs with timely and comprehensive legislation that ensures access to meal programs for all eligible children. The authorization for these federally-funded child nutrition programs expired in September 2015 and is currently being maintained through a Continuing Resolution.

School Breakfast Program:

- 1. Protect and maintain the school nutrition standards in SBP and NSLP in reauthorization.
- 2. Increase the SBP and NSLP reimbursement rates for meals served to align with new meal pattern regulations that have caused increased costs for meal providers beyond the additional six cents they currently receive for following the regulations.
- 3. Provide a higher per-meal school breakfast reimbursement rate for schools adopting breakfast after the bell models to incentivize districts to utilize these methods to increase SBP participation and financial support for potential associated start-up costs.
- 4. Eliminate the reduced-price copayment in both the SBP and NSLP, and implement a corresponding increase in reimbursements to schools, thereby removing a significant financial barrier for low-income families.
- 5. Increase the number of low-income children who are directly certified for free school meals by virtue of their participation in other means-tested programs:
 - a) Require school districts to certify all categorically eligible children directly.
 - b) Require states to incorporate Temporary Assistance to Needy Families and Food Distribution Program on Indian Reservations data into current data matching systems.
 - c) Require schools to formalize coordination with homeless liaisons, migrant education coordinators, Head Start program coordinators, and local foster care agencies.
 - d) Extend categorical eligibility to children in all military households that receive the Family Subsistence Supplemental Allowance for free meals to be directly certified.
- 6. Protect and maintain the Community Eligibility Provision (CEP) at its current threshold of 40% Identified Student Percentage for eligibility.

7. Reinstate flexibility for states to allow schools to adopt CEP for the next school year beyond the June 30 deadline.

Child & Adult Care Food Program

1. Streamline access:
 - a) Align the eligibility requirement with the Department of Education's Title 1 and 21st Century Community Learning Center programs by improving the area eligibility test to allow child care providers to receive the higher Tier I CACFP reimbursement if 40% of children in the neighborhood are eligible for free or reduced-price meals.
2. Streamline/simplify administration to improve program access:
 - a) Establish a "provision 2" option that would align CACFP with NSLP, streamlining paperwork and maximizing access to technology for parents, programs, and sponsors.
 - b) Extend area eligibility to child care centers in CACFP.
 - c) Reauthorize a representative work group to guide CACFP paperwork reduction efforts.
3. Maximize program effectiveness:
 - a) Ensure the CACFP reimbursement rates for meals and snacks served aligns with new meal patterns that strengthen the nutritional quality of meals and snacks, to sustain providers' viable participation.
 - b) Restore CACFP child care centers' and homes' option to serve a third meal to children in their care for 8 hours or more.

Summer Food Service Program

1. Streamline access:
 - a) Align the eligibility requirement with the Department of Education's Title 1 and 21st Century Community Learning Center programs by expanding the SFSP area eligibility threshold from 50% of students qualifying for free or reduced-price school meals to 40% of students qualifying for free or reduced-price school meals.
2. Streamline/simplify administration to improve program access:
 - a) Allow local government agencies and private non-profit organizations to feed children year-round through the SFSP.
3. Maximize program effectiveness:
 - a) Increase flexibility and explore other options to provide nutrition support to children with limited access to congregate feeding models outside of school.
 - i. Implement a Summer EBT for children qualified for free/reduced price school meals.
 - ii. Provide funding for start-up grants for mobile meals and other innovative strategies for rural and other hard-to-reach communities.
 - iii. Give funding priority for federal grants to programs that sponsor/operate all eligible child nutrition programs.
 - iv. Allow all SFSP sites the option of serving a third meal.

Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)

1. Provide state option to raise cutoff age from 5 to 6 with the exception of children participating in full-day kindergarten.
2. Provide state option to certify infants for two year eligibility periods.
3. Provide state option to certify postpartum mothers for two year eligibility periods.
4. Strengthen WIC vendor rules to assure access for WIC participants.
5. Reauthorize the WIC Farmers Market Nutrition Program.
6. Authorize \$25 million annually in WIC MIS and EBT system development.
7. Emphasize the importance of implementing EBT by the 2020 deadline.

NEW YORK STATE PRIORITIES

In support of New York State’s anti-hunger agenda, NYS should ensure “No Wrong Door” policies among all nutrition assistance programs and between those programs and other low-income programs, including the creation of systemic connections that allow secure sharing of application information among agencies to determine eligibility for all means-tested programs. The following administrative and legislative changes are recommended to maximize the number of eligible low-income New Yorkers receiving federal nutrition benefits:

Anti-hunger Prioritization and Programming:

Engage the health and medical community to promote nutrition as an essential component of a healthy life:

1. Increase provider screening for food insecurity among low-income, vulnerable populations.
2. Teach professionals to identify hunger by incorporating training into curricula to recognize signs and symptoms of hunger.
3. New York’s Prevention Agenda and other health planning processes should re-establish hunger as a public health priority, and include the identification of policies and programs for the public health and healthcare systems to address food insecurity as a factor in adverse health outcomes.

Supplemental Nutrition Assistance Program (SNAP): In recent years, New York State has taken many positive steps towards maximizing access to, and participation in SNAP. Additional opportunities are available for the state to reduce hunger by increasing the number of eligible people who receive SNAP benefits through simplifying the application process, creating more efficiency across the state, and improving state-based outreach and education efforts. To this end, New York State should:

1. Improve and expand state-level outreach and education efforts:
 - a) Expand the Nutrition Outreach and Education Program so that it can serve all New York State counties and provide additional services in high-need counties.
 - b) Increase outreach and education to vulnerable populations with low participation.
 - c) Create linkages between Medicaid and SNAP databases to conduct “in-reach” with Medicaid recipients who are currently not receiving SNAP.
 - d) Ensure outreach, education and application assistance through health homes, Federally Qualified Health Centers, and other healthcare practices that serve a large percentage of low-income patients.
2. Streamline/simplify program:
 - a) Adopt uniform rules and ensure uniform enforcement of SNAP across the state.
 - b) Adopt a standard excess medical deduction.
 - c) Simplify the reporting requirements for six- month reporters by removing the periodic reporting requirement.
 - d) Establish a seamless inter-county transfer process for SNAP recipients who move between counties that would maintain eligibility, ensure the continuation of benefits and reduce administrative burdens.
 - e) Establish a 24-month certification period for kinship non-parent caregiver households.
3. Increase access to SNAP by eligible people:
 - a) Allow students at Community Colleges in NYS who are enrolled in a certificate or degree program that is considered a career or technical education program to qualify for SNAP.
 - b) Take maximum advantage of federal ABAWD waivers, grant exceptions, and exemptions, and provide ABAWD individuals with timely, consistent, understandable instructions on compliance.
 - c) Develop an Elderly Simplified Application Project in NYS.

- d) Improve access to SNAP for those individuals leaving prison and re-entering society.
 - e) Monitor the combined application project (NYSNIP) which will provide individualized budgets for SSI live-alones when automatically enrolling them in SNAP.
4. Maintain and increase the adequacy of benefits, and incentivize healthy eating, through SNAP:
- a) Ensure that NYS's short term agreement to provide uninterrupted access for SNAP recipients at Farmers Markets using a cellular-based redemption system is made permanent.
 - b) Maintain food choice for SNAP recipients and support public campaigns that promote healthy eating.
 - c) Continue and expand incentive programs to increase buying power for fruits and vegetables at farmers markets and extend these initiatives to include fresh, canned and frozen produce as well as lightly processed food at other types of SNAP retailers.

Child Nutrition Programs: New York State should pursue existing opportunities to improve the administration and delivery of the National School Lunch Program (NSLP), School Breakfast Program (SBP), Summer Food Service Program (SFSP), the Child and Adult Care Food Program (CACFP), and the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC). Through a combination of administrative and legislative changes, we recommended these actions to increase the number of low-income children receiving federally-funded, free, or reduced-price meals through these programs:

School Breakfast Program

1. Improve upon current school breakfast state law in the following ways:
 - a) Require all schools in which 40% or more students qualify for free and reduced-price school lunch to participate in the SBP.
 - b) Require all schools with 60% or more students qualifying for free or reduced-price meals to offer breakfast at no cost to all students, and a Breakfast after the Bell program with all-student access.
 - c) Allocate funding each year to cover implementation costs in schools newly required to implement, or voluntarily implementing, Breakfast After the Bell service models.
2. Eliminate the reduced-price copayment for school breakfast and lunch, thereby removing a significant financial barrier for low-income families.
3. Establish a state-level policy to ensure local school district wellness policies prioritize maximizing the federal Child Nutrition Programs, as proposed by the Wellness, Equity & Learning Legislation (WELL) campaign
4. Maximize use of Community Eligibility Provision:
 - a) Increase number of eligible schools implementing CEP to expand school breakfast and lunch participation.
 - b) Provide guidance to schools on CEP implementation and its potential impact on state aid and state foundation funding.
 - c) Hold CEP schools harmless from changes to state aid formula as a result of operating a universal school meal program.
 - d) Require all CEP schools to offer an after-the-bell breakfast program with all-student access.
 - e) Ensure NY State Education Department (NYSED) monitors implementation and continues to make improvements to data matching algorithms within the state level Direct Certification Matching Process.

Child and Adult Care Food Program:

1. Improve and expand state-level outreach and education efforts:
 - a) Increase outreach, education, application and claiming assistance to providers with low participation.
 - b) Ensure NYS Department of Health (DOH) regularly assesses, revises if needed, and reports on the use of online CACFP prescreening tool for potential providers.
 - c) Strengthen linkages between Office for Children and Family Services (OCFS) and DOH/CACFP databases to conduct "in-reach" with OCFS providers who are not participating in CACFP.

- d) Create linkages with NYSED and DOH/CACFP databases to conduct “in-reach” with summer meals sponsors and districts that provide afterschool snacks through NSLP.
 - e) Provide supplementary guidance on School Age Child Care (SACC) registration requirements to prepare better afterschool programs seeking to apply for CACFP.
2. Streamline and simplify the administration of CACFP by implementing allowable USDA paperwork reduction recommendations when applicable to NYS.
 3. Require eligible schools hosting space for afterschool enrichment programs or providing extended learning days to provide access to CACFP’s At-Risk Afterschool Snack/Supper Program and/or NSLP snacks.
 4. Require schools and community based organizations receiving funds through OCFS (Advantage After School, Empire State, and Youth Development Program) or NYSED (21st Century Community Learning Centers, Extended School Day/School Violence Prevention) administered afterschool program grants to prescreen for eligibility for, and encourage eligible programs to apply for, CACFP’s At-Risk Afterschool Snack/Supper Program. Provide supplemental assistance and/or payments to current and eligible CACFP providers for training, technical assistance, and administrative compliance, and in recognition of food and administrative costs to provide the program in NYS.
 5. Promote the use of model practices from other states that increase participation and retention, such as:
 - a) Offer alternative meal service models such as the [umbrella model](#), meals in the classroom, and campus model.
 - b) Maximize current sponsor capacity (for both affiliated and unaffiliated sites).
 - c) Provide recorded online training opportunities for potential and new sponsors.
 - d) Provide additional technical assistance throughout the application process and beyond.
 - e) Provide guidance specific to school food authorities to show flexibility in the sponsor application process for these entities.

Summer Food Service Program

1. Require school districts with eligible schools in underserved communities to provide meals to sites, as a sponsor or vendor, for a minimum of 30 days, with increased administrative support from the regulatory agency.
2. Develop a system to promote and connect sites with sponsors in both SFSP and CACFP, including posting information and resources on both agency websites; coordinate, cross-promote and cross train on both programs.
3. Provide supplemental reimbursement for sponsors who include enrichment activities in their meal service and/or provide transportation to underserved areas.
4. Create new funding sources to increase the amount of NYS-grown fruit and vegetables on the menu.
5. Create incentive funding sources to encourage sponsors in good standing to expand their service reach in terms of meal types served, average daily participation, and days of service in underserved areas, weeks of summer and/or school holidays.
6. Ease program administration and operation for sponsors and sites by integrating the use of more technology to increase capacity.