



July 15, 2022

Interagency Planning Task Force
White House Conference on Hunger, Nutrition, and Health
Biden-Harris Administration

Via Email

To Whom It May Concern:

Based on our commitment to improving food security and our collective experiences as elected officials and organizational leaders in Maryland, Virginia, and the District of Columbia; we're writing to share priorities for the upcoming White House Conference on Hunger, Nutrition, and Health.

More background on the [Food and Agriculture Regional Member \(FARM\) Policy Committee](#) at the Metropolitan Washington Council of Governments (COG) that we currently lead, and the following priorities, can be found in an attachment to this letter. In this attachment, we also provide a weblink to our comprehensive assessment of healthy food access policies in our region,

The following national strategy priorities reflect the positions of the FARM Committee:

- 1. Guarantee universal, healthy school meals for all.** Providing universal free school meals for all children will improve access to nutritious meals, in turn improving children's capacity to learn. FARM has expressed its support for universal free school meals on multiple occasions.
- 2. Increase SNAP benefits and reduce barriers to enrolling and maintaining benefits.** The Supplemental Nutrition Assistance Program (SNAP) provides a vital source of support to many of our region's most vulnerable residents. Additional emergency allotments have been critical to assisting many in avoiding severe food insecurity.
- 3. Prioritize lived experience in strategies to end hunger and improve nutrition and health.** Hunger and food insecurity are solvable problems. We appreciate and commend the conference's stated intention and interest in centering lived experience in strategies to end hunger and improve nutrition and health. We are eager for the feedback on ways to do this to be considered from our local jurisdictions, such as from the Fairfax County Emergency Food Strategy Team and Fairfax Food Council.
- 4. Support BIPOC farmers and small farmers to broaden access to healthy, local food and increase supply chain resilience.** The COVID-19 pandemic disrupted global and local food supply chains, highlighting the fragility and importance of our food system as a national security issue. A diverse local and regional food system, supported by a robust farming community of farmers identifying as Black, Indigenous and People of Color (BIPOC) and of small farmers, is essential to the resilience of the United States.
- 5. Improve online SNAP.** Although SNAP is "interoperable" between states and allows participants in our region to cross state lines for greater choice and convenience - crucial in a region as interconnected as ours - online SNAP is not currently allowed across state lines. We urge USDA to establish a pilot program to move toward interoperability for online SNAP, and to continue to make other specific improvements to this program as enumerated in Attachment 1.

6. **Expand the use of Medicaid reimbursement for nutritious foods.** There are several food as medicine programs in DC, MD, and VA, including the Produce Prescription Program (Produce Rx) coordinated by DC Greens in partnership with several DC health clinics, medical providers, and Giant. We recommend action to encourage states to seek Medicaid waivers which would make programs like Produce Rx a coverable expense.
7. **Provide flexible forms of cash assistance.** Several jurisdictions in our region are piloting Guaranteed Basic Income Programs to put resources directly into the hands of those who are most vulnerable, trusting that they know how to best meet their needs when they have the means to do so. The federal government should implement its own pilot.
8. **Fast track eWIC solutions for farmers markets and other changes to continue to improve access to healthy, local and regional food.** With the move from paper checks to eWIC, WIC customers are no longer able to use their WIC Vegetables and Fruit Cash-Value Checks (CVC) at farmers markets. Technological changes to federal benefit distribution and redemption need to consider all eligible points of sale prior to implementation. A fix is urgently needed for eWIC.
9. **Lead by example: Connect federal workers to local, healthy food to support health, wellness, and drive food system transformation.** The federal government has a vast office and installation footprint across the country. Tasking agencies to develop Workplace Community Supported Agriculture Programs could have a meaningful impact on local and regional food systems, demonstrate leadership by example, and promote healthy eating.

We hope these priorities will be incorporated into the national strategy presented at the conference and would welcome an opportunity to meet with you to share additional insights from our experience. Achieving some of our priorities will require Congressional buy-in and approval. In these cases, we hope the strategy shared in September will map out how to attain this.

We are eager to participate in the conference and bring its outcomes back to our FARM Committee.

The event is just the beginning of an opportunity to bring renewed commitment, understanding, and more integrated approaches to eliminating food insecurity and improving health. Again, additional information about COG and FARM's proposed national priorities for the conference strategy are provided as an attachment to this letter.

Please do not hesitate to reach out with any questions.

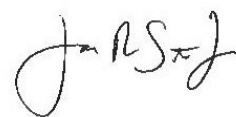
Sincerely,



Mary Cheh
Chair, FARM Committee
District of Columbia



Craig Rice
Vice Chair, FARM Committee
Montgomery County, MD



Jon Stehle
Vice Chair, FARM Committee
City of Fairfax, VA

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C: COG Congressional Delegation
Office of Congressional Representative Jim McGovern

Enc: Attachment 1 - COG, FARM, and National Strategy Priorities Background

Attachment 1. COG, FARM, and National Strategies Priorities Background

COG and FARM

The Metropolitan Washington Council of Governments (COG) is an independent, nonprofit association, with a membership of 300 elected officials from [24 local governments](#), the Maryland and Virginia state legislatures, and U.S. Congress. Every month, more than 1,500 officials and experts connect through COG to share information and develop solutions to the region's major challenges.

The [Food and Agriculture Regional Member \(FARM\) Policy Committee](#) is COG's newest committee and comprised of local elected officials and organizational leaders in food and agriculture from the District of Columbia, Maryland, and Virginia. FARM is charged with making policy recommendations to support a more resilient, connected food and farm economy in metropolitan Washington. Addressing the food insecurity crisis exacerbated by the pandemic is a key focus for our committee.

Recently, FARM released *The Healthy Food Access Policy Compendium for Metropolitan Washington*. It is available at www.mwcog.org/foodpolicy.

This landscape assessment highlights state and local policies supporting food security and healthy food access which have been promulgated over the last decade. It also includes examples of how our local laws have built off, and in many cases, sought to address gaps in many essential federal nutrition programs.

National Strategy Priorities

1. Guarantee universal, healthy school meals for all.

Providing universal free school meals for all children will improve access to nutritious meals, in turn improving children's capacity to learn. FARM has expressed its support for universal free school meals on multiple occasions, most recently asking Congress to include an extension of U.S. Department of Agriculture's (USDA) nationwide waiver authority in the Consolidated Appropriations Act of 2022.

In addition to implementing the Community Eligibility Provision (CEP) in many of our schools, all our jurisdictions – DC, MD, and VA – have taken additional steps to reduce the cost of school meals for low-income families. But we know that many children will continue to fall through the cracks, particularly during the upcoming school year when some of the most important USDA COVID-related waivers expire. Many families will have to prove eligibility for free and reduced meals for the first time in two years.

Universal, healthy school meals should be available to all students throughout the year through federal funding. It should be a seamless experience for students, families, and school food service nutrition staff to participate in and administer meal programs, whether during the regular school year or summer.

We applaud USDA for extending numerous flexibilities during the pandemic which allowed parents and guardians to pick up meals for children, meal service time flexibility, the allowance of non-congregate feeding, and meal pattern flexibility in the child nutrition programs. These flexibilities allowed our schools to continue to serve all children for free without unnecessary restrictions.

These adaptations should be part of the new normal, as should sustained investments and support to schools for increasing local and regional procurement and improving opportunities for BIPOC and small farmers and food producers to participate as suppliers.

2. Increase SNAP benefits and reduce barriers to enrollment and maintaining benefits.

The Supplemental Nutrition Assistance Program (SNAP) provides a vital source of support to many of our region's most vulnerable residents; giving them resources to meet their basic food needs. Working with USDA, our jurisdictions continue to issue Emergency Allotments to SNAP customers, a vital strategy that has kept many of our residents from experiencing severe food insecurity. We urge the federal government to make these higher levels of support more permanent.

The adjustment to the Thrifty Food Plan last fall was important as it recognizes the increased cost of a healthy diet with a modest increase to SNAP benefits, however, this alone is not sufficient. Prior to the COVID-19 public health emergency, the level of SNAP benefits was often inadequate for SNAP customers, particularly in communities like the Metropolitan Washington region with high costs of living, leading both DC and MD to supplement the minimum monthly benefit with state funds.¹ As the country recovers from COVID-19, experiences inflated food costs, and seeks to address health inequities and hunger, we need a federal commitment to permanently higher SNAP benefit levels.

We also urge the White House and the USDA to do everything in their authority to increase support to states for the administration of the program, including streamlining application requirements, providing flexibility for recertification processes, and increasing program eligibility and participation among eligible immigrants, and their children in mixed-immigration status households. Educational outreach can address the stigma and fear of repercussions from enrolling in nutrition benefit programs, concerns that persist stemming from the proposed Public Charge rule, which deter many residents from receiving critical assistance to feed their families.

3. Prioritize lived experience in strategies to end hunger and improve nutrition and health.

Hunger and food insecurity are solvable problems. We appreciate and commend the conference's stated intention and interest in centering lived experience in strategies to end hunger and improve nutrition and health.

To this end, we would also like to highlight local efforts in our region which are providing feedback to the White House Conference to center lived experiences in their input. Among these are the feedback that will be submitted by:

- The Fairfax County Emergency Food Strategy Team and the Fairfax County Food Council from their survey and June 29th meeting.

¹ Maryland supplements the minimum monthly SNAP benefit for seniors.

- Montgomery County Food Council

Furthermore, we urge this conference to include as a recommendation, a national study on food insecurity and food access among immigrants and refugees which would provide a pathway for community members to identify the challenges they face and opportunities to solve them. Among other outcomes, such a study could be used to create and adjust programs to be more culturally responsive to the needs of diverse communities.

4. Support BIPOC farmers and small farmers to broaden access to healthy, local food and increase supply chain resilience.

The COVID-19 pandemic disrupted food supply chains and highlighted the fragility and importance of our food system as a national security issue. Diversity improves resilience and our food system lacks this on several measures, including who prospers from growing, processing, and selling food.

We are heartened by efforts such as USDA's Local Food Purchase Assistance Cooperative Agreement Program, however, local and regional procurement needs to become a more routine part of federal, state, and local food purchase programs in the near and long-term.

This is also an opportunity to address past discrimination and harm by examining the specific policies and programs that will support farmers identifying as Black, Indigenous and People of Color (BIPOC) and other small farmers.

BIPOC farmers are diverse in their needs and experiences. It is essential that policies and programs to support their increased participation in supplying food for farm-to-school, farm-to-hospital, and other farm-to-table efforts, are crafted separately with their input.

It is with this understanding that one of FARM's Work Groups will be looking at procurement opportunities and barriers in our region. The group will start by examining the experiences and needs of Black farmers descended from slavery, moving on to address barriers faced by farmers of other races and ethnicities, once the work group has learned about and considered specific solutions for Black farmers.

5. Improve online SNAP.

The expansion of the USDA's authorization of online SNAP purchasing in 2020 was an incredibly positive step towards addressing food insecurity nationally and in our region. Online SNAP provides many of our residents, particularly seniors, and those living in low food access neighborhoods without reliable transportation access, with the option to purchase groceries online and have them delivered to their doorsteps.

Yet several challenges have arisen in the implementation of online SNAP. First, although SNAP is "interoperable" between states and allows participants to cross state lines for greater choice and convenience - crucial in a region as interconnected as ours - online SNAP is not currently allowed across state lines. We urge USDA to establish a pilot program with several regional grocers to move toward interoperability for online SNAP.

In addition, many independent and smaller grocers have reported challenges applying for authorization to accept online SNAP and offer home delivery. While online SNAP is an essential service for SNAP customers, we are concerned that in its current form, it could hurt our local economies by driving SNAP dollars away from small, locally owned businesses. Along these lines, there is an opportunity to expand online SNAP to Community Supported Agriculture (CSA) programs. We encourage USDA to improve its processes to work with small businesses, including farms, and to expand access to online SNAP to additional retailers.

6. Expand the use of Medicaid reimbursement for nutritious foods.

FARM strongly believes that nutritious food is crucial to improving health outcomes for residents at risk of or living with chronic and diet-related disease. The *Healthy Food Access Policy Compendium for Metropolitan Washington* includes information on Food as Medicine Programs in DC, MD, and VA. This includes DC's Produce Prescription Program (Produce Rx) open to qualifying DC Medicaid members coordinated by DC Greens in partnership with the DC Department of Healthcare Finance and several local health clinics, healthcare providers, and Giant.

We understand that several state Medicaid agencies have successfully leveraged the Section 1115 Demonstration Waiver to have Produce Rx and other food as medicine programs included as covered treatment options. We hope the White House Conference strategy will include action from the Centers for Medicare & Medicaid Services to encourage more states to pursue this waiver. This could be done by creating a universal waiver for utilization of Produce Rx, and other medically supportive food, as a covered benefit for eligible patients, or by developing clear guidance and templates for applying for a waiver to do so.

7. Provide flexible forms of cash assistance.

Poverty, and a legacy of discriminatory practices and policies, are at the root of food insecurity and a lack of access to healthy food. Navigating tradeoffs and the high costs of things such as childcare, housing, and health care, put pressure on the family's food budget.

Several jurisdictions in our region are piloting Guaranteed Basic Income Programs, providing flexible cash resources to low-income residents, trusting that they know how to best meet their needs when they have the means to do so. One of the pilot programs in our region was born out of a very successful grocery store gift card program during the pandemic. Another pilot program specifically targets pregnant women, with the goal of improving maternal infant health.

We urge the White House to consider opportunities to leverage discretionary funds to support Guaranteed Basic Income pilot programs in support of food access and other basic needs, and to require the establishment of a program participant council to center lived experiences in program deployment.

8. Fast track eWIC solutions for farmers markets and other changes to continue to improve access to healthy, local and regional food.

With the move from paper checks to eWIC, WIC customers are no longer able to use their WIC Vegetables and Fruit Cash-Value Checks (CVC) at farmers markets. This has limited the WIC dollars that can be used at farmers markets to only WIC Farmers Market Nutrition Program (FMNP) dollars.

As an example, at one DC farmers market, the market organization operator has had to turn away WIC families that have used paper WIC checks in the past to purchase fresh fruits and vegetables. They estimate that this will result in a loss of \$80,000 of WIC purchases at this market in 2022. This needs to be addressed urgently, and future technological changes to federal benefit distribution and redemption need to consider all eligible points of sale prior to implementation.

There are other policy changes that could improve access to healthy, local and regional food for low-income residents using federal benefits. For example, USDA's requirement that each farmers market acquire its own license and account with the Food and Nutrition Service (FNS), limits innovation and expansion of healthy food access opportunities. For farmers market organizations that run multiple markets and aspire to support communities with new markets, farm stands, etc., the administrative burden created by this requirement is an impediment to growth.

9. Lead by example: Connect federal workers to local, healthy food to support health, wellness, and drive food system transformation.

For several years, COG has offered a modest, employer-based incentive program to partially subsidize the purchase of a farmer-owned Community Supported Agriculture (CSA) share from our region's farmers. This program was inspired by a program in Baltimore and led COG to work with colleagues across the country to help conceive of what is now the [CSA Innovation Network](#) (CSA-IN). CSA-IN contains our country's leading support organizations for CSA coalitions across the country, including those with experience developing and supporting Workplace CSA Programs.

The federal government has a vast office and installation footprint across the country. Tasking agencies to develop Workplace CSA Programs could have a meaningful impact on local and regional food systems. It would demonstrate leadership by example and promote healthy eating.

While it is essential to prioritize the needs of our country's most vulnerable residents in the overall strategy presented at the White House conference, studies have shown that many Americans do not consume as many fruits and vegetables as they need to. Further, federal employees receive a wide range of compensation. Encouraging federal employees to support the regional farm economy promotes diversity and resilience in the food system which is important to medium- and longer-term food security. BIPOC and small farmers with CSA programs should be highlighted and promoted through these programs.