

Testimony on Food Insecurity in Pennsylvania

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Senate Minority Policy Committee

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Good morning, Chairwoman Muth, Senator Schwank, Senator Tartaglione, and Senator Street, committee members and staff. My name is Scott Cawthern, and I serve as the Acting Deputy Secretary for the Office of Income Maintenance (OIM) in the Department of Human Services (DHS). On behalf of Acting Secretary Snead, I would like to thank you for the opportunity to testify today regarding food insecurity in Pennsylvania. Food security is a core social determinate of health, one of the many factors outside of a person's immediate medical condition and genetics that drives health outcomes. My testimony will focus on the role that DHS had played in mitigating food insecurity during the pandemic through the operation of the Supplemental Nutrition Assistance Program (SNAP) operated in partnership with federal United States Department of Agriculture (USDA), Food and Nutrition Service and the role DHS can play going forward to ensure that all Pennsylvanians, particularly children, have enough food on the table to ensure a healthy citizenry.

Before the COVID-19 pandemic, approximately 1.53 million Pennsylvanians experienced chronic hunger on a regular basis, with nearly half a million of them being children. But during the early months of the pandemic, the food insecurity rate in Pennsylvania is estimated to have increased from 11.1 percent in 2018 to more than 33 percent in March 2020, per researchers at the Pennsylvania State University Social Science Research Institute.¹ In addition, data from the U.S. Census Bureau indicated that in Pennsylvania, 11.3 percent of adults live in a household "where there was either sometimes or often not enough to eat in the last 7 days."² As a result of COVID-19, many households saw an increase in food consumption, a shortage of food available at their local food sources, a decrease in income, or some combination of all three.

Due to the public health crisis, many schools engaged in virtual learning during the spring of 2020 and continued to do so during fall and winter classes. In addition, at various points since the Governor's disaster declaration was first issued in March 2020, Pennsylvania counties have been in various states of opening. Due to the need for extended periods of social distancing and self-isolation (especially during the initial phase of the pandemic), children who would otherwise be accessing meals at school were at home for extended periods to prevent spread, thus increasing the overall demand within households for food. Schools were able to provide grab-and-go meals to help meet this need, but depending on parents' and families' jobs and circumstances, they may not have been able to regularly use this option.

While children lost access to alternative means of food service, older adults also saw similar reductions in available resources. Many programs that provide services and assistance to elderly or disabled households also had to shutter their services during the initial waves of the COVID-19 response. Meals on Wheels America found that nearly all local Meals on Wheels programs were experiencing increased demand, with new meal requests for some programs doubling from March 1, 2020 to May 7, 2020.³ As a high-risk population, many elderly citizens have taken special care to avoid grocery stores and other congregate settings as much as possible to

¹ <https://covid-19.ssri.psu.edu/articles/food-insecurity-pennsylvania-during-covid-19-pandemic>

² https://www.census.gov/data-tools/demo/hhp/#/?measures=FIR&s_state=00042&mapPeriodSelector=&mapAreaSelector=st&s_metro=

³ <https://www.mealsonwheelsamerica.org/learn-more/national/press-room/news/2020/05/07/new-survey-data-demand-on-meals-on-wheels-national-network-swells-and-wait-lists-grow-due-to-covid-19-pandemic>

minimize the chance of contracting COVID-19. The Secretary of Health's worker safety order⁴ required businesses to designate a specific time for high-risk and elderly persons to use the business at least once every week if there is a continuing in-person customer-facing component, such as at grocery stores. The order also encouraged use of online ordering by providing delivery or pick up options. While many grocery stores have gone above and beyond to provide options and alternatives, the hours specifically for seniors are limited and often very early in the day, thus making the window of safer shopping difficult to access.

Many public transportation options also had to close or significantly reduce their availability as a result of distancing concerns. For households who rely on public transportation, this translates to limited options for purchasing groceries and forces households to prioritize proximity over affordability. While Pennsylvania has joined the online purchasing pilot, this option can still be burdensome to low-income households because they must still find the extra money in their tight budgets to afford the delivery fees, for which SNAP benefits cannot be used, and most local supermarkets do not participate.

Pennsylvania also has higher food costs than other states. The result is that the value of the maximum SNAP benefit is lower in purchasing power than many other parts of the country. In 2010, the SNAP maximum benefit covered less than 65 percent of the cost of the Thrifty Food plan, except in the northwest corner of the state, where it reached 65 to 70 percent.⁵

In addition to SNAP, many low-income families also turn to other possible sources for food, such as food banks and pantries. With COVID-19 forcing many businesses to close for a period, many families that saw a reduction in income also turned to food banks and pantries for assistance. In normal times, food banks and pantries rely on donations from local residents, restaurants, or grocery stores. With the mitigation efforts put into effect to combat COVID-19, many donations were reduced or stopped, and charitable food programs even paused in-kind donations. This resulted in the local food banks and pantries having to shift their operational model while also experiencing a dramatic increase in demand from more families affected by the pandemic and rapid change to our economy and overall way of life. The Feeding Taskforce worked to supplement the work of these partners by coordinating the distribution of approximately 5.1 million meals. These meals were a combination of fresh family style meals prepared through our partnership with Operation BBQ Relief and shelf stable meals purchased from the Defense Logistics Agency.

While early in the pandemic food banks and pantries had lower quantities of food available to distribute, the price of food at grocery stores rose, especially with issues related to food chain supply throughout the country. From July 2019 to July 2020, food prices have increased by 4.1 percent,⁶ including an increase of 3.09 percent during the first two months of the recession. The cost of eating at home rose faster between February and April 2020 than any other two-month period in the past 30 years.⁷ Pennsylvania has seen higher consumer spending than the national

⁴ <https://www.governor.pa.gov/wp-content/uploads/2020/04/20200415-SOH-worker-safety-order.pdf>

⁵ <https://www.sciencedirect.com/science/article/pii/S0167629619304151>

⁶ <https://www.ers.usda.gov/data-products/food-price-outlook/summary-findings/>

⁷ <https://www.reuters.com/article/us-health-coronavirus-usa-prices/how-covid-19-affected-u-s-consumer-prices-in-march-idUSKCN21S20H?il=0>

average. As of May 10, overall consumer spending in the state had decreased by 13.3 percent from January 24 but spending on groceries had increased by 30.1 percent.⁸

This increase in food consumption and loss of food access is compounded even further when also faced with a reduction in income. From March 15, 2020 through September 5, 2020, Pennsylvania had 2,100,739 unemployment claims filed.⁹ In addition, the unemployment rate in Pennsylvania increased from 4.7 percent in February 2020 to 13.7 percent in July 2020, and prior to passage of the Consolidated Appropriations Act, 2021, unemployment compensation was counted as income that precluded individuals from qualifying for food assistance, even if their overall income was reduced.¹⁰

Further, as the USDA has acknowledged, as incomes rise, households spend more money on food, but it represents a smaller overall budget share.¹¹ The inverse is also true. While a reduction in income causes households to spend less on food, the overall percentage of their income that is being spent for food increases. While low-income households receiving close to the maximum SNAP benefit allotment may not have seen as large of a reduction in income, many still saw some reduction in income, but with little additional SNAP benefit provided. This effectively served to punish these households for not earning enough income prior to the health emergency, while households that had higher incomes and were therefore receiving less SNAP benefits were granted additional SNAP benefits to bring them up to the maximum. Forty percent of SNAP households – effectively our lowest income SNAP recipients – got no additional SNAP funds each month.

Pennsylvania requested additional emergency allotments for those that had received none prior because they already received the maximum SNAP benefit and for those who had received emergency allotments but whose allotments were not at least 50 percent of the maximum benefit amount. These households had been denied additional payments due to the United States Department of Agriculture’s Food and Nutrition Service guidance and interpretation of the language in the FFCRA. Fortunately, this inequity was rectified through a federal settlement which allows for payments of these additional benefits for Pennsylvanians. In addition, the Biden administration has recently amended its guidance and, going forward, is allowing all SNAP recipients to receive a minimum emergency allotment of \$95 including those households receiving the maximum benefit amount. Pennsylvania will be able to continue requesting emergency allotments each month as long as both state and federal disaster declarations remain in effect.

The SNAP maximum benefit, however, is not enough on a per meal basis to cover the cost of food in every county in Pennsylvania, based on the amount of the maximum benefit in

⁸ <https://www.hks.harvard.edu/centers/mrcbg/programs/growthpolicy/real-time-economics-new-platform-track-impacts-covid-19-people>

⁹ <https://www.uc.pa.gov/COVID-19/Pages/UC-Claim-Statistics.aspx>

¹⁰ <https://www.bls.gov/eag/eag.pa.htm>.

¹¹ <https://www.ers.usda.gov/data-products/ag-and-food-statistics-charting-the-essentials/food-prices-and-spending/>

comparison to prices in the state.¹² While the USDA adjusts the maximum benefit amount on an annual basis, it does so in a retroactive manner by adjusting the benefit based on the increase in food prices determined by the Consumer Price Index. However, this annual determination of the maximum benefit amount is already three months out of date when implemented and becomes even more out of date over the course of the year.

Per information provided by the United States Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation (ASPE), 42 percent of households reported being food insufficient. ASPE cites the source of this information as “*ASPE tabulations of the COVID Impact Survey (April through June 2020), the Census Household Pulse Survey (July 16-July 21, 2020), and ASPE tabulations of the December 2018 Current Population Survey Food Security Supplement.*” The 42 percent is based on householders responding in the affirmative to the statement, “The food we bought just didn’t last and we didn’t have money to buy more.” (Ghertner, Robin and Suzane Macartney. What Happens After CARES? Projections of Poverty and Program Eligibility from the COVID-19 Pandemic and Economic Recession. The National Governors Association and the American Public Human Services Association. 27 Aug. 2020. Webinar).

Individuals experiencing food insecurity are more likely to have poorer health and to have chronic conditions that are often better managed with a nutritious diet, which make individuals significantly more susceptible to a worse prognosis if they contract COVID-19. A recent study of nonelderly adults with household incomes below 200 percent of the federal poverty level showed that food-insecure households had a statistically significant 21 percent higher risk of clinical hypertension than food secure households.¹³ The risk of clinical diabetes was 50 percent higher among adults living in food-insecure households compared with their food secure counterparts, another statistically significant result. For those already diagnosed with diabetes, control of the disease was worse when the household was also food insecure. Finally, other studies have demonstrated that individuals with chronic conditions like diabetes pay more out-of-pocket costs to manage their disease, potentially creating a negative feedback loop that makes affording food even more difficult.¹⁴ This interplay between food insecurity and chronic conditions is problematic during normal times, but during a pandemic, it can have calamitous effects. The Centers for Disease Control has identified diet-related conditions, such as hypertension and diabetes, as causing individuals to be at increased risk for severe illness or death from COVID-19.¹⁵ Indeed, early epidemiologic studies have demonstrated that those with diabetes and COVID-19 were more likely to be admitted to an intensive care unit or to die, and the risk of death is even higher in those with uncontrolled diabetes.¹⁶

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https://www.urban.org/sites/default/files/publication/96661/how_far_do_snap_benefits_fall_short_of_covering_the_cost_of_a_meal_2.pdf

¹³ Seligman HK, Laraia BA, Kushel MB. Food insecurity is associated with chronic disease among low-income NHANES participants. *J Nutr.* 2010; 140(2):304-10.

¹⁴ Bernard DM, Banthin JS, Encinosa WE. Health care expenditure burdens among adults with diabetes in 2001. *Med Care.* 2006; 44:210-5.

¹⁵ Centers for Disease Control and Prevention. “People with Certain Medical Conditions.” Updated September 11, 2020. Available from: <https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/people-with-medical-conditions.html#diabetes>

¹⁶ Williamson E, Walker AJ, Bhaskaran K et al. “Factors associated with COVID-19 related hospital death in the linked electronic health records of 17 million adult NHS patients.” *J Chem Inf Model.* 2019; 53:

Feeding America reported a significant impact on food insecurity due to the pandemic. Food banks have reported a 65 percent increase in demand. Feeding America also reports that there has been an increase of over 634,000 newly food insecure individuals in the state and that 64 of the 67 counties in Pennsylvania now have a food insecurity rate above 13 percent and that 32 counties have rates in excess of 16.5 percent.¹⁷

Pennsylvania responded to these challenges. Between March 29, 2020 and April 3, 2021, Pennsylvania food banks report having:

- Served **29,794,709** (duplicated) individuals total
- Served **about 551,700** individuals per week
- Provided **263,588,480** pounds of food.

This is incredible work that has undoubtedly helped thousands of Pennsylvania families make ends meet. But the charitable food network has always served as a supplement to the SNAP program. There is no charitable food network infrastructure that would come even close to meeting the needs of Pennsylvania families if SNAP benefits were not available. For every meal provided by a Feeding Pennsylvania food bank, the SNAP program provides nine.

Unfortunately, food insecurity does not affect all Pennsylvanians the same. For Black and Latinx children, the situation is even more dire. The Center on Budget and Policy Priorities reports that “up to 28 percent of children in Black households and up to 23 percent in Latino households live in households where children didn’t eat enough in the last seven days because the household couldn’t afford it, compared to 10 percent of children in white households.”¹⁸ The same article references the long-term consequences of food insecurity, including health problems and behavioral and mental health issues. The consequences of which are lower test scores, reduced likelihood of graduating high school and reduced earnings as adults.¹⁹

The Introduction of Pandemic Electronic Benefit transfer (P-EBT)

To address the loss of access to school lunches due to virtual learning in the state, Congress established the P-EBT to meet the additional challenge of having students home full-time. The P-EBT program was created by the Families First Coronavirus Response Act (FFCRA) to provide students who would normally have received free or reduced-price meals through the National School Lunch Program (NSLP) with funds to cover the meals they missed while being out of school during the pandemic. The benefits are issued to an Electronic Benefits Transfer

1689-1699. Available from: https://www.nature.com/articles/s41586-020-2521-4_reference.pdf?referringSource=articleShare

¹⁷ Feeding Pennsylvania website

<https://feedingpa.org/about/#:~:text=In%20fact%2C%20Feeding%20Pennsylvania%20member,65%20percent%20increase%20in%20demand.&text=Overall%2C%20there%20are%20now%202.04,who%20are%20now%20food%20insecure.> Accessed November 10, 2020.

¹⁸ [Food Assistance in American Rescue Plan Act Will Reduce Hardship, Provide Economic Stimulus | Center on Budget and Policy Priorities \(cbpp.org\)](https://www.cbpp.org/blog/boosting-snap-benefit-increase-would-help-children-in-short-and-long-term)

¹⁹ See Brynne Keith-Jennings, “Boosting SNAP: Benefit Increase Would Help Children in Short and Long Term,” CBPP, July 30, 2020, <https://www.cbpp.org/blog/boosting-snap-benefit-increase-would-help-children-in-short-and-long-term>.

(EBT) account and are treated the same as SNAP benefits. The first round of P-EBT was issued to cover the period of March 16, 2020, through June 12, 2020. The Continuing Appropriations Act, 2021 and Other Extensions Act then extended P-EBT for the 2020-2021 school year. The DHS and Pennsylvania Department of Education (PDE) partnered in issuing P-EBT benefits during the previous school year and are working together again to issue benefits for the current school year.

During the P-EBT issuances for last school year, Pennsylvania issued more than \$360 million in P-EBT benefits to a little over one million children. For this first round of P-EBT, children received a benefit based on when they became eligible for free or reduced-price meals through the NSLP. If they were eligible on March 31, 2020 or before, they received the full amount of \$370.50. If the child became eligible in April 2020, they received \$302.10. If the child became eligible in May 2020, they received \$176.70. And if the child became eligible in June, they received \$57.

For the current school year, changes had to be made to P-EBT because there is not one statewide mandated form of learning for schools. Some schools have operated virtually for much of the school year, while others have been fully in-person during the school year. Still others have operated as a hybrid or blended model, meaning that children are in-person some days and virtual others. Even within this blended model, there are hundreds of variations that schools have used, as each school has operated in the way it feels would best serve its students. For P-EBT, DHS created learning models based on the form of learning for each student: virtual, in-person, or blended. The learning model for each student was based on their type of participation over a one-month period. Pennsylvania then assigned a specific benefit to each instructional model type. A virtual student will receive 100 percent of the benefit for any month they are considered virtual. A blended student will receive 65 percent of the benefit for any month they are considered blended. An in-person student will not receive any benefits for any month they are considered in-person.

Since the school year is required to be 180 school days in length and there are nine months from September through May, Pennsylvania will treat each month as if it had 20 school days for the purposes of issuing P-EBT. This means that a full benefit for a month for a virtual student would be \$136.40 per month and if the student was virtual for the entire school year, they would receive \$1,227.60. A blended student will receive \$88.66 for each month they are considered blended for September through February. Because more schools are starting to resume in-person learning, PDE will be surveying the schools in May to determine whether the 65 percent benefit is still appropriate or if it should be adjusted because children are in school more frequently.

Benefits for the current school year will be issued in three phases and are planned in late Spring and early summer. Based on the number of children that received P-EBT during the previous school year, DHS and PDE estimate that approximately 928,000 children will qualify for P-EBT for the current school year. We estimate that these children will receive approximately \$1 billion in P-EBT benefits spread out through the three phases of issuances.

The Continuing Appropriations Act, 2021 and Other Extensions Act Pub. L. No. 116-159 also added an option for P-EBT to be provided to SNAP children in childcare. The Act also modified

the rules for the childcare population to allow any child, age 5 or younger, to be considered enrolled in childcare. DHS submitted and received approval on a state plan to issue benefits to this population. The benefits are issued in three phases, each approximately two weeks after the P-EBT for school children has been issued. The benefit period for this group is from October 1, 2020 through May 31, 2021. An eligible child receives a benefit that matches the schools in the county and any contiguous counties, in which the child resides. If multiple schools are in the county, then the highest benefit would take priority. In other words, if there is a school that is considered virtual and a school considered blended in the county (or any contiguous county), then the child will receive a full virtual benefit. The benefit levels are the same for this group as the P-EBT for school children group. So a child that is in a county with a virtual school would receive \$136.40 for each month that the school is considered virtual and up to \$1091.20 for the entire period, if a school continues to be considered virtual in that county for the full school year.

Based on the number of eligible children, DHS estimates that approximately 223,905 children will qualify for P-EBT under this program. We estimate that these children will receive approximately \$244 million in P-EBT benefits, spread out through the three phases of issuances.

Based on the language within the Continuing Appropriations Act, 2021 and Other Extensions Act, P-EBT can also be issued for the summer months. While states are still waiting for guidance from the USDA's FNS regarding what this summer P-EBT program will entail, many safe assumptions can be made, such as any child that is eligible for NSLP will be eligible for the benefit and it would be treated as a full virtual benefit for each month during the summer, since all schools are closed. Once FNS has provided guidance, DHS and PDE intend to review and pursue these benefits as well, if feasible.

College Student Eligibility

DHS provided testimony on the issue of college students to the House Minority Policy Committee on January 29, 2020. A copy of that testimony has been included as an appendix. In it, we discussed issues with the federal policy and limitations on eligibility for college students. As with other policies, the pandemic only added to the inability for students to access the food assistance needed to help them succeed in their educational pursuit. DHS requested a waiver of the limitations on student access in March of 2020 but that waiver was denied. However, Congress acted as a part of the American Recovery Plan ([American Rescue Plan Act of 2021, Pub. L. No. 117-2](#)) and extended access to students that had an expected family contribution of zero dollars or had been approved for work study even if work study slots were unavailable. DHS supports these changes and would like to see them as permanent eligibility criteria to support college students.

Recommended Changes

Because SNAP is a federal program, most policy changes would require federal action. As stated above, we would like to see the changes to the student eligibility rules become permanent. We also support changes to the base calculation of the SNAP benefit amounts from the Thrifty food plan to at least the Low-cost food plan which is more representative of how people today shop and eat. On the state level, we would like to see more coordination between all the food

systems in the state including the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), SNAP, NSLP, and others to ensure that eligible families are receiving all the food assistance for which they qualify and to ensure that children and families receive the nutrition supports as they grow.

Conclusion

This testimony only discusses a small part of the issue of food insecurity in Pennsylvania and the work that has been done, particularly during the pandemic, to address it. DHS has issued over \$3 billion in additional federal resources through the SNAP emergency payments and the P-EBT programs. We have also accessed available waivers and have issued guidance to our county assistance offices to ensure people have access to the benefits they need for their households. But we know there is more to do to ensure that all families have equitable access. Providing access to address nutritional needs strengthens families, provides better health outcomes, more successful educational and employment outcomes and can reduce poverty. Numerous studies have shown that addressing food insecurity provides reductions in healthcare claims, avoids early delivery and increases infant birth weights. Along with that, providing funds for food purchases has a positive economic impact on communities, supports local farmers and small businesses in communities and neighborhoods across Pennsylvania. DHS is happy to discuss these issues further and is appreciative of this opportunity to provide our testimony today.

Appendix

Testimony on College Hunger

Catherine Buhrig

Bureau of Policy, Director, Office of Income Maintenance

House Minority Policy Committee
January 29, 2020

Good morning, Chairman Sturla, committee members, and staff. I am Catherine Buhrig and I serve as the Director of the Bureau of Policy for the Office of Income Maintenance (OIM) in the Department of Human Services (DHS). On behalf of Secretary Miller and Deputy Secretary Watson, I would like to thank you for the opportunity to testify today regarding Hunger on College Campuses. Food security is a core social determinate of health, one of the many factors outside of a person's immediate medical condition and genetics that drives health outcomes. As a result, my testimony will focus on the role that the DHS can play in campus hunger's mitigation based on existing policy, ways the state may expand its current policies, and actions taken by other states to address this issue.

The Scope of Campus Hunger

Growing levels of food insecurity on college campuses are reflective of the extent to which the contemporary college student may not reflect the "traditional" idea of who a student is and how federal and state policy may not have kept up to date with students' needs. Figures from the National Center for First Generation College Success show that 56% of all students in 15-16 academic year had no parent with a bachelor's degree²⁰. A 2019 report from the Institute for Women's Policy Research discovered that 22% of all undergraduates are parents²¹. This complicates the picture that many have of a student population which lives on campus full time, is focused exclusively on their studies and who attends with support from a two-parent household. To the contrary, students today are managing rising costs while simultaneously, seeking a degree which has never been more necessary for long term labor-market success. These students may live off campus, requiring them to compete in costly rental market, and they may be working part or full-time to cover their expenses with minimal support from family members. A 2018 survey from the Wisconsin Hope-Lab indicated that 82% of community college students and 79% of four-year college students were employed or actively seeking employment.²²

Research from the Federal Reserve Bank of New York shows that college degree holders can expect a wage premium of \$30,000 annually or 75% of those with only a high school diploma or equivalent²³, making college completion a key part of becoming a member of the middle class. Given this growing differential, the stakes of degree attainment are so high that students with fewer resources are enduring previously unheard-of levels of deprivation to try and capture the American dream. A 2018 Government Office of Accountability report analyzed data from 7.3 million students living at less than 130% of the FPIG and found that 31% were first generation college students and 25% were single parents. This report included a literature review of 31 studies of college hunger and indicated there was a range of between 9% and 50% food insecurity on campuses but that in 22 of these studies food insecurity was estimated to be above 30% of students surveyed. This review also indicated that food insecurity was often higher

²⁰ <https://firstgen.naspa.org/research-and-policy/national-data-fact-sheets-on-first-generation-college-students/national-data-fact-sheets>

²¹ https://iwpr.org/wp-content/uploads/2019/04/C481_Parents-in-College-By-the-Numbers-Aspen-Ascend-and-IWPR.pdf

²² <https://hope4college.com/wp-content/uploads/2018/09/Wisconsin-HOPE-Lab-Still-Hungry-and-Homeless.pdf>

²³ <https://libertystreeteconomics.newyorkfed.org/2019/06/despite-rising-costs-college-is-still-a-good-investment.html>

among two-year college students (42%) though still prevalent among four-year college students (36%).²⁴

Current Availability of Support

The Supplemental Nutrition Assistance Program (SNAP), formerly known as food stamps, is widely regarded as the nation's leading anti-hunger program. Despite the prevalence of food insecurity among the college student population, there are strict limitations on when a student may qualify for this entitlement, rooted in the outdated conception of what a student looks like. SNAP is a federal program administered by states that helps low-income Pennsylvanians get the food they need to prevent hunger and malnutrition. The United States Department of Agriculture's Food and Nutrition Service (FNS) is the federal agency responsible for the oversight of SNAP, while DHS is the state agency responsible for administering SNAP here in Pennsylvania. Because it is a federal program, the eligibility rules are rooted in federal legislation and regulation. States have some flexibility through the availability of state options and through federal approval of waivers. All SNAP benefits are 100 percent federally funded, SNAP is the largest federal nutrition assistance program and provides the most impact in serving individuals and families with food insecurity across the country. Households receive an Electronic Benefits Transfer (EBT) card which they can use in grocery stores and farmers markets that have been approved by FNS to accept SNAP benefits. The EBT card is used much the same as a credit or debit card. A recipient can use the card at a Point of Sale (POS) device, then enter a Personal Identification Number (PIN) which allows them to pay for allowable food costs. SNAP benefits can only be used towards food for human consumption and seeds or plants that can be used to grow food for personal consumption. SNAP benefits cannot be used towards items such as alcohol, pet food, hot foods, or hot food products prepared for immediate consumption, such as a rotisserie chicken. In addition, SNAP cannot be used towards any nonfood items, like paper products, soap, medicines or tobacco products. SNAP eligibility is determined based on the household's gross income in comparison to the appropriate Federal Poverty Income Guideline (FPIG). With Pennsylvania's current Broad-Based Categorical Eligibility, households that have an elderly or disabled member have an income limit of 200 percent of FPIG, while households without an elderly or disabled member have an income limit of 160 percent of FPIG. For a household of three, this is equal to \$3,556 per month for a household with an elderly or disabled member and \$2,845 per month for a household without an elderly or disabled member. If a household is under the income limit, they receive certain deductions that determine how much in SNAP benefits the household can receive. These deductions include a standard deduction, an earned income deduction, child care deductions, medical expense deductions, and shelter and utility costs. I've taken the time to explain how SNAP works in general because in addition to the information that I've already stated, students are subject to additional eligibility requirements. To be eligible, students must be:

- Under age 18 or age 50 or older
- Considered physically or mentally unfit
- Attending high school
- Responsible for the care of a dependent household member under the age of 6
- Participating in on the job training or a work-study program

²⁴ <https://www.gao.gov/assets/700/696254.pdf>

- Working 20 hours per week
- Receiving TANF benefits
- Enrolled full time in an institution of higher education AND a single parent responsible for the care of a dependent child under age 12
- Enrolled in an institution of higher education in compliance with an Employment and Training (E&T) program.

These conditions make it difficult for college students to qualify for SNAP benefits, even as food insecurity on college campuses continues to grow.

Despite these limitations DHS has taken steps to improve food security the expansion of student SNAP eligibility to community colleges in 2018. The last student eligibility criterion listed above was that the student be enrolled in an institution of higher education and in compliance with an E&T program. Federal regulations specify that to be comparable to a SNAP E&T program for student eligibility purposes, a program must meet three requirements:

- The program must directly enhance the employability of participants;
- The program must be operated by a state or local government; and
- The program must have a focus on low-income households.

As community colleges are government operated are frequently attended by low-income individuals, DHS expanded student eligibility to include students at a community college who are enrolled in a major that falls under the Carl D. Perkins Career and Technical Education Improvement Act of 2006 (Perkins IV) or a major that leads to a career in a High Priority Occupation as defined by the Pennsylvania Department of Labor and Industry. Any students attending a community college at least half-time in a major that meets these requirements may now be SNAP eligible, if they meet the standard SNAP financial and non-financial criteria.

Action Taken by Other States

In recognition of the growing need among college students, Pennsylvania along with many other states, have been looking at ways to address campus food insecurity. In 2010 Massachusetts was one of the first states to confer SNAP eligibility to community college students. This change was key to informing Pennsylvania's own policy change. In 2014 California passed Assembly Bill (AB) 1930 mandated that the California Department of Social Services (CDSS), work with the California Community Colleges, State University system, University of California, the state Workforce Development Board, county human service agencies, and advocates to establish a protocol to identify and verify all potential exemptions to the student eligibility rule. This resulted in a similar but more wide-reaching policy change being enacted that identified a broad swath of programs from across the state that qualified to confer SNAP eligibility and established a protocol to consider new programs which may confer eligibility. AB 1930 was followed by provisions in the 2017 California state budget which dedicated \$7.5 million for the state and Community College Systems to develop student meal credit sharing programs known as Swipe Out Hunger, create campus food pantries, and designate employees to assist students with SNAP enrollment. New Jersey, in 2019 passed AB 4702 which created a \$1 million fund to support campuses in establishing solutions to address hunger.

Future Potential Policy Changes

To improve the well-being of Pennsylvanians and continue our work towards the alleviation of campus hunger DHS is working to release additional policy updates for the Fall semester of 2020

which will again, expand the population of students which may be eligible for SNAP. The department is working with administrators and faculty in the Pennsylvania State System of Higher Education (PASSHE) system to determine programs and program guidelines which could be used to expand the eligibility policy to every PASSHE campus and also state-related and independent colleges and universities, provided the student is participating in a program that meets the three criteria previously discussed: directly enhance employability of recipients; operated by a state or local government; and have a focus on low-income households. The ultimate success of this project will require an ongoing effort to ensure that the department and post-secondary institutions of higher learning continue to engage with each other to identify programs that can confer SNAP eligibility and an ongoing effort to ensure that students are aware that they may be eligible to receive. I look forward to sharing more of the details of this policy change with you in the near future.

Conclusion

In closing, on behalf of DHS, I would like to thank you for your dedication to the citizens of Pennsylvania and for allowing us this opportunity to share our thoughts today.