



July 28th, 2022

To the White House Conference Committee on Hunger, Nutrition, and Health:

Thank you for the opportunity to provide comments aimed at shaping the content and strategy of the White House's Conference on Hunger, Nutrition, and Health in September 2022. Our comments are influenced by the years of expertise in pursuing our mission to end hunger here in our community across Eastern Massachusetts, in addition to feedback from listening sessions we held with our food distribution partners and clients we serve to capture real-life expertise and solutions of those living with food insecurity, volunteers, employees of food pantries and other supporting services.

About The Greater Boston Food Bank and Eastern Massachusetts Network

The Greater Boston Food Bank (GBFB) is the largest hunger-relief organization in New England and among the largest food banks in the country. GBFB operates in the nine counties of Eastern Massachusetts, encompassing 190 cities and towns. These nine counties—Barnstable, Bristol, Dukes, Essex, Middlesex, Nantucket, Norfolk, Plymouth, and Suffolk—include the entirety of the Greater Boston region from the New Hampshire Border, as far west as Worcester and down through the Cape and islands. As the food bank feeding Eastern Massachusetts, GBFB distributes the equivalent of nearly 100 million healthy meals annually through a network of 600 dedicated food distribution community partners, including food pantries, homeless shelters, human services organizations, and mobile markets at k-12 schools, colleges, community health centers, and senior centers. GBFB also has a Nutrition Team which provides nutrition education and programming as well as SNAP Outreach and application assistance.

A member of the national Feeding America network, GBFB's mission is to end hunger here and remains committed to the belief that access to healthy food is a basic human right regardless of an individual's circumstances. Through policy, partnerships, and providing free, nutritious, and culturally responsive food, GBFB is committed to addressing the root causes of food insecurity while promoting racial, gender, and economic equity in food access.

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Since early 2020, the number of individuals that GBFB food distribution partners report serving each month rose to over 600,000, which is 120% more people seeking help than pre-pandemic. The state of hunger has grown in the Commonwealth due to the economic impact of the COVID-19 pandemic and the already existing disparities among our most vulnerable citizens. A recently published statewide report published by GBFB, "[Opportunities to Improve Food Equity and Access in Massachusetts](#)," indicates that as many as **one in three people in Massachusetts experienced food insecurity at some point in 2021**. With food supply chain disruptions, inflation at an all-time high driving a cost-of-living crisis, and Massachusetts consistently ranking among the most expensive states for groceries, we are experiencing greater need with limited resources across our communities than ever before. During the pandemic, we saw how the flexibility of nutrition waivers and expanded access to federal nutrition and economic programs improved access and equity, despite increases in need. We must leverage this opportunity to elevate the voices of those facing food insecurity through policy solutions that remove barriers to access and increase efficiencies in the enrollment and delivery of services, benefiting clients and our government.

Themes from the Eastern Massachusetts Community

The Greater Boston Food Bank is providing comments on behalf of our Eastern Massachusetts community focusing on three conference pillars: *Improve Food Access and Affordability*, *Integrate Nutrition and Health*, and *Enhance Nutrition and Food Insecurity Research*. In addition to our expertise in working to end hunger in our community over the last four decades, we wish to express the insights, perspectives, and recommendations collected over the course of two listening sessions, and multiple written and video-recorded comments with GBFB partners agencies and clients who utilize our services. Top concerns and themes include:

1. High Level of Need

Our recent statewide study showed as many as 1 in 3 people found themselves food insecure at some point last year. Food pantry use among those experiencing food insecurity increased from 27% in 2019 to 46% in 2021, indicating that more of those in need were receiving assistance from our network partners. Just in the last few months, our partners have been reporting even higher numbers of clients seeking their services, the most they have seen over the last two years of the pandemic, putting more demand on our food bank.

"We are now serving 500 families per week, up from about 40 to 80 families per week this time pre-pandemic. We feed 500 families in the hour and 45 minutes that we're open every week. Which has far surpassed what we've ever seen, and these numbers aren't going to go down any time soon." - **Food pantry coordinator, Revere MA**

"Demand has risen dramatically in recent years, most especially in the past 12 months. For FY21, our pantry served 6,616 clients, and in FY22, we served 12,534 clients - almost double the demand in just one year. Cost of living, particularly costs for housing, gas, utilities, and food, is a major contributor to this

trend. Many new clients come to us having never accessed a food pantry before because they cannot feed themselves and their families without assistance.” - Food pantry volunteer, Medway MA

2. Inflation and High Cost of Living

Inflation has risen to its highest point in over 40 years. Everyone is feeling the pinch of food, gas, and astronomically high costs of living, but those who have already been struggling with food insecurity or were on the brink are feeling it harder right now. Despite some economic gains, the individuals living on the edge of poverty can't afford such a drastic change in costs of living, and our federal nutrition and economic benefits need to be able to respond to shifts in the economy. Eighty-five percent of GBFB's Elevating Voices listening session participants cited "Inflation and rising food costs" in their top three root causes of hunger and poverty that need to be addressed in order to help people facing hunger. Additionally, statewide data shows that 24% of first-time food pantry users cited rising costs of healthcare as a primary driver for visiting food pantries last year.¹

Inflation, the evolving labor market, and federal nutrition policy inaction continue to pinch GBFB and our partners, too. In FY22, GBFB is seeing a nearly 15% (up from 11% earlier in the fiscal year) increase in average food pricing compared to FY21 due to a variety of reasons including standard price adjustments, inflation driving cost increases, and supply chain disruptions. According to the Bureau of Labor Statistics, the cost of groceries (food at home) rose 12.2% in the last 12 months, the largest increase since 1979. Fuel costs for GBFB's fleet of trucks have increased by as much as 70%, with no end in sight.

“The rising cost of everything is hitting families hard. It's a hierarchy of needs: do I put food on the table, do I pay my rent, my utilities. I need gas to get to work and to pick up groceries. Even with a good job, I just can't get ahead right now—my benefits aren't enough.” - Food pantry client from Roslindale, MA

“One of the things I'm concerned about is the price of fresh food. It's creating a cyclical dependence on quick, cheap meals, bringing up another generation of people who rely on quick and fattening meals instead of fresh and healthy foods.” - Food pantry client and volunteer from Medford, MA

3. Infrastructure and Capacity Restraints

Our agency partners are struggling to meet the demand for emergency food in their communities. Based on our partner agency monthly reporting, network food pantries may have served an average of nearly 600,000 people per month over the last year, the most we have seen in GBFB history. This is more than twice the number of people that our partner agencies reported serving before the pandemic.

Despite unprecedented demand, many pantries do not have sufficient food storage capabilities, especially for perishable goods, and face limitations on how much food they can receive, store, and distribute. Infrastructure investments such as forklifts, refrigeration, and small trucks or trailers that can make multiple stops would optimize operational capacity and lessen the burden on physical operations

¹ [GBFB Food-Access Report22 FINAL 6.6.22-1.pdf](#)

of running a food pantry. Despite Massachusetts establishing a \$24 million Food Security Infrastructure Grant (FSIG) program² to address the food system in the Commonwealth (which some smaller pantries were unable to access due to the matching fund requirement) and GBFB infusing nearly \$3.3 million into our network and over \$1.9 million specifically through Community Investment grants since the beginning of the pandemic to address these capacity issues, many partners continue to feel the strain given space or infrastructure restraints.

What's more, labor is a major concern. Pantries are often run by volunteers and operate with fewer staff than is needed to efficiently serve more than double the volume of people that visited our network partners last year. Transportation is a major barrier and the demand for more home-bound delivery programs has increased, particularly among seniors and disabled, but the labor and infrastructure does not exist to support these needs from the community. GBFB is currently experiencing a shortage of Class A and Class B drivers as well as warehouse workers, and competition for this skilled labor is high.

"We have more YMCA distribution sites than we have volunteers to pack and distribute food." - client/volunteer from south shore area, MA

"With staff or volunteer burnout, a lack of funding for full-time staff members, and sickness, if one member of the team is unable to work, the whole system is thrown off. We need more funding for full-time staff members, especially people who can lift heavy boxes or bags of food and operate vehicles for food delivery." Food pantry director, Boston MA

"One policy that assisted in our community was subsidized meal programs through the public schools. During the height of the pandemic, families relied upon their schools to provide meals seven days a week. When these programs ended with the 2021-22 school year, our pantry launched a grocery pickup program. This was a significant undertaking for our pantry (which is 100% volunteer staffed), but we saw a need in our community that was no longer being met so we had to step in to help." Food pantry volunteer, Medway MA

"Since staffing has been such an issue at our pantry, we got connected with DoorDash for deliveries. They have a volunteer arm and are really excited to be involved. We started using them for our homebound neighbors program; every Thursday they take on 25-30 deliveries and could probably do more." Food pantry director, West Roxbury MA

4. Food Equity, Access, and Efficiency

Inequities remain prevalent in Massachusetts, with Latinx/Hispanic, Black, and LGBTQ+ individuals, and households with children continuing to disproportionately experience food insecurity.³ Beyond economic hardships, those experiencing food insecurity also report significantly higher levels of

² <https://www.mass.gov/service-details/food-security-infrastructure-grant-program>

³ [GBFB Food-Access Report22 FINAL 6.6.22-1.pdf](#)

perceived everyday discrimination. GBFB network clients and food pantry staff alike recognize the need to reduce stigma and discrimination and increase access to food pantry services in a dignified way.

Our partners are often inadequately staffed to accommodate translation services for the steady number of non-English speaking clients, and face barriers in referring eligible clients to additional social services. Translation services and native-language speakers to support with on-site distribution are needed. Additionally, a consistent barrier to access that we have heard from clients is the burdensome and complicated benefits enrollment process. Often requiring fax machines, printers, in-person interviews, and excessive documentation, the layers of bureaucracy embedded in the enrollment process itself discourage those in need from seeking services. Policy solutions that support streamlined enrollment and delivery of benefits for those seeking food assistance are critically needed to equitably and effectively serve those most in need, while also improving processes within government.

Our communities need more culturally responsive foods, home-delivery options, and enhanced support in enrolling in social benefits. Centering those with lived expertise in food insecurity throughout the decision-making process in food assistance programming and planning must be prioritized.

"I'm a 51-year-old disabled woman; my annual income is \$13,040. I'm very fortunate to receive EBT, SNAP, and HIP benefits. Programs like Community Servings that deliver healthy meals to my door are helpful for my mobility issues. I enjoy being involved in my community and am grateful to serve on the Fairhaven Commission on Disability where I advocate for high-risk individuals who cannot easily access proper nutrition." -Food pantry client, Fairhaven MA

"We need to remove the shame and stigma that surrounds people experiencing food insecurity. I want to see more people with lived experience of navigating complicated social service systems making the decisions in leadership in food access initiatives." -Food pantry volunteer and client, Medford MA

Policy Recommendations

In addition to the following policy priorities, we recommend that all policymakers at the federal, state, and local levels prioritize hunger-relief and anti-poverty policies to alleviate the immediate needs of our community and eliminate the root causes of poverty driving food insecurity. We need solutions that disrupt upstream structural barriers that lead to food insecurity, including investments in affordable public transportation systems, childcare, and housing.

The White House must work with Congress to support the continuation of elevated funding and increased access for U.S. Department of Agriculture (USDA) Food and Nutrition Services (FNS) programs outlined in Child Nutrition Reauthorization (CNR) and the 2023 Farm Bill to prioritize adequate funding, promote equitable access, and remove systemic barriers from federal nutrition programs. Congress has a renewed opportunity to strengthen child nutrition programs through CNR legislation to better reach children and serve families in need. Congress should support policies that increase access to child

nutrition programs, particularly out-of-school time programs that provide meals, educational enrichment, and physical activities at schools, parks, recreation centers, nonprofit organizations, and other sites, in any authorizing legislation. CNR should make permanent the *Keep Kids Fed Act*⁴ including, but not limited to, USDA's summer nutrition waiver authority, meal pattern waivers, and non-cost nationwide waivers. Additionally, the 2023 Farm Bill will enhance additional federal nutrition programming and strengthen the nation's food system while connecting and removing barriers to food for our most vulnerable communities. USDA should invest in national and local agriculture and should incentivize growers to produce and harvest food that the food assistance networks and clients they serve need versus purchasing food the agriculture industry can't sell. This would support a more effective food system and culturally responsive food available to those who struggle to afford the food they need.

There must be a recognition that addressing hunger will require deep collaboration and coordination between public and private organizations and leaders. U.S. federal agencies, cabinet members, and members of Congress must act together and facilitate and support the same level of cooperation at every level of government and community down to the municipal level.

Specific policy recommendations include:

- **Supplemental Nutrition Assistance Program (SNAP): Protect and Strengthen SNAP's structure, eligibility, and benefits in the 2023 Farm Bill.** Specifically:
 - Congress should support changes to nutrition programs that expand access and funding:
 - SNAP benefits should be set at an adequate level (i.e., based on the Low-Cost Food Plan) for families to purchase sufficient quantities of nutritious foods.
 - Eighty-three percent of respondents to Feeding America's national survey, made up of different demographics and political beliefs, support increasing the income limits for SNAP and increasing the amount of benefits a family receives to reflect the real cost of living and buying groceries.⁵
 - Allow individuals on the cusp of the cutoff, undocumented people, and college students to more easily access SNAP benefits.
 - Provide unified and streamlined enrollment services.
 - Do not limit foods families and individuals can buy with SNAP.
 - Include prepared foods in SNAP's offerings.
 - Increase the number of SNAP-eligible vendors at farmers' markets, summer markets, and farm stands.
 - Remove burdensome enrollment barriers like excessive documentation and in-person interviews.

⁴ <https://www.agriculture.senate.gov/newsroom/dem/press/release/president-signs-the-keep-kids-fed-act>

⁵ [Map the Meal Gap 2022 Report.pdf \(feedingamerica.org\)](#)

- **USDA The Emergency Food Assistance Program (TEFAP) Funding for Food and Infrastructure**
 - TEFAP mandatory funds should be authorized *at least* \$450 million per year in the 2023 Farm Bill to support critical food bank capacity and equipment needs through member-directed spending projects.
 - TEFAP Storage and Distribution Funds should increase to reflect the actual distribution costs needed to \$200 million per year, and should also include “last-mile” storage funds for TEFAP distributing community organizations.
 - TEFAP Infrastructure Grants should remain at \$15 million per year.
 - Make temporary pandemic USDA TEFAP flexibilities permanent:
 - Broaden eligibility from 185% of Federal Poverty Level (FPL) to 250% of FPL (sustain pandemic expansion).
 - Provide more options for flexibility in administering the program, including approval for meal sites or food pantries to distribute food through methods including drive-up, tailgate distribution by food banks, and guidance provided by the local board of health.

- **USDA Commodity Supplemental Food Program (CSFP)**
 - As the sole administrator of CSFP for Massachusetts, GBFB recommends:
 - Eligibility broadened from 130% of FPL to 185% of FPL.
 - Exclude Medicare from consideration as income.
 - Maintain sufficient funding to address increasing food costs while providing nutritious food to seniors.
 - Acknowledging that we are still operating under pandemic conditions, for FY2023 caseload, hold harmless states that did not meet caseload in FY2022.

- **Special Supplemental Nutrition Program for Women, Infants, and Children (WIC):** Extend access to women and children and make permanent the flexibilities that allow for remote enrollment, services, and benefit issuance, and facilitating online ordering.

- **Universal National School Meal Program (NSP) and School Breakfast:** Congress should pass legislation to ensure that every child is fed and ready to learn without worrying about cost or stigma. At the minimum, the reduced-price eligibility category should be eliminated.
 - According to GBFB’s report, *Opportunities to Improve Food Equity and Access in Massachusetts*,⁶ as many as 40% of households with children experienced food insecurity in 2021. Overall, adults with children were twice as likely to use a food pantry in 2021 compared to adults without children. With skyrocketing inflation and the cost of living reaching all-time highs, food pantries are seeing more new families accessing services than ever before.

⁶ [GBFB Food-Access Report22 FINAL 6.6.22-1.pdf](#)

- Federal child nutrition programs provide tremendous relief to families with children. Statewide data estimated that free school meals can save households up to \$1,200 per student every year.
 - The census bureau's household survey demonstrated that during the pandemic, school meals in Massachusetts were the primary source of free food for families.
 - In 2019, 26% of food insecure children were ineligible to receive free or reduced-price school meals in our traditional meal system. This amounts to over 30,000 students who fail to receive the nutrition support they need, as food insecure students receive as much as half of their daily nutrition during the school day. These students and many of those who do qualify for free or reduced-price meals face the twin barriers of cost and stigma.
- **Summer Food Service Program (SFSP):**
 - Bundle meals, deliver and provide grab & go options which would make summer meals the most efficient, and equitable way to feed more children while they are not in school.
 - Streamline regulations for community-based providers so they can feed children year-round through SFSP.
 - Lower the threshold for area eligibility from 50% to 40%.
 - Establish a Summer EBT at \$75 a month.
- **Child and Adult Care Food Program (CACFP):** CACFP provides reimbursements for nutritious meals and snacks to eligible children and adults who are enrolled for care at participating child care centers, day care homes, and adult day care centers. Streamlined enrollment for providers and increased reimbursements are needed to support access to nutrition in early childhood education and adult care centers.
- **USDA Grants:** Increase and expand funding opportunities to states and local communities to address capacity restraints, food supply, equity, and access issues. Examples:
 - In Massachusetts, during the pandemic the state began the **MA Food Security Infrastructure Program (FSIG)** and infused \$56M in grant funding into its local food system in response to increased demands for food assistance needs and food supply chain issues. This program can be replicated and scaled nationally and should prioritize funding to the food assistance system, while also supporting the local food industry.
 - **Massachusetts Emergency Food Assistance Program (MEFAP):** Massachusetts currently funds the four food banks across the state at \$30M for the purchase of food for their 1,000 food distribution partners. This program spends 24% locally on MA-based vendors and 8% on Mass Grown farmers. GBFB's food acquisition team understands the unique purchasing processes and needs of its network partners and has a long history of responsibly managing the purchasing power of its food industry and local partners and connecting food to those who need it most across its trusted and sustainable network.

Local food purchasing within the state should leverage this infrastructure to maximize local funding.^{7,8}

- Grant funding to states aimed to address low-income communities should be encouraged to submit joint proposals with their Feeding America food bank system since they are working with the largest network of sustainable and community-trusted organizations across their states.
 - Good examples that could be continued are the recent TEFAP Reach and Resiliency⁹ and Local Food Purchasing Assistance Cooperative Agreement grants.¹⁰ Portions of these funds allocated to states should be distributed directly to communities to identify the best use based on local needs in their communities, like the CARES and ARPA funding allocations to local communities.
- **Integrate Nutrition and Health:**
 - Scale up Massachusetts Healthy Incentives Program (HIP),¹¹ which was originally established in 2017 through a USDA grant, and provides monthly incentives to SNAP households when they purchase fresh, local fruits and vegetables from MA-based farmers, farmers' markets, farm stands, and CSAs.
 - Ensure that there is adequate funding for this program at the state level to operate year-round by enacting HIP into law.
 - Expand HIP participation to more local vendors and at seasonal markets and farmstands in BIPOC communities.
 - Expand and increase utilization of nutrition education programs like GBFB's [Click 'N Cook](#), an online tool, managed by GBFB's registered dietitians who provide essential nutritional advice and recipe guidance, allowing users to find simple, healthy recipes with ingredients commonly distributed by pantries. The program reflects our food bank's commitment to improving community health with culturally responsive recipes while addressing food insecurity.
 - Incentivize partnerships and support technology investments that connect food bank networks and community health centers through reimbursed referrals and interventions, similar to the 1115 Waiver piloted in Massachusetts with MassHealth and reimbursement for nutrition and housing social determinants of Health.
 - Partner with national organizations such as the Hunger to Health Collaboratory (H2HC: <https://h2hcollaboratory.org/>), an initiative of GBFB, to effectively harness the political will around the connection between food and health and convenes cross-sector stakeholders, advocates for policies and philanthropy, and support critical research.

⁷ <https://www.mass.gov/service-details/massachusetts-emergency-food-assistance-program-mefap>

⁸ <https://www.gbfb.org/what-we-do/advocate/advocacy-priorities/massachusetts-emergency-food-assistance-program-mefap/>

⁹ <https://www.fns.usda.gov/tefap/reach-resiliency-grant>

¹⁰ <https://www.ams.usda.gov/selling-food-to-usda/lfpacap#:~:text=The%20purpose%20of%20this%20program,the%20purchase%20of%20domestic%20local>

¹¹ <https://seureservercdn.net/45.40.145.201/ghl.292.myftpupload.com/wp-content/uploads/2022/03/HIP2022.pdf>

- **Workforce Development and Training (focus on the Food & Logistics Sector):**
 - We recommend a partnership between USDA and the U.S. Department of Labor to explore workforce development solutions in order to maintain resiliency within the system. Job training, k-12 education, and vocational-technical schools focused on the food system, volunteerism, and logistics jobs should be prioritized and promoted.
 - Funding for community ambassadors, prioritize employment opportunities for people with lived expertise.
 - Expand Americorps programming for short-term volunteer programming or implement a national volunteer system and database to connect local nonprofits with their communities similar to the Boston Cares-GBFB website connecting Boston area volunteers with volunteer opportunities at food distribution partners across our region: <https://www.bostoncares.org/gbfb>
 - Pass the Raise the Wage Act of 2021. This bill would increase the federal minimum wage, last raised in 2009, from \$7.25 to \$15 by 2025. Massachusetts increased minimum wage to \$14.25 this year, yet people are still struggling to get ahead of the high cost of living and inflation.

- **Support Families with Children: Child Tax Credit (CTC) and Earned Income Tax Credit (EITC):** Congress should expand and make permanent the Child Tax Credit within the EITC.
 - The temporary expansion and monthly delivery mechanism of the CTC in the American Rescue Plan is a crucial support for families. Even before the pandemic, the CTC and EITC lifted more children above the poverty line (5.5 million) than any other economic support program.
 - Recent research from Children's HealthWatch shows that low-income families with young children receiving CTC payments report higher rates of food security and parents being in excellent or good health than those not receiving payments. Data also show that after the advance CTC expired, there was a 12% increase in food insufficiency in households with children in February 2022.¹²

- **Address College Hunger and Basic Needs on Campus:**
 - Enact the College Student Hunger Act of 2021 to expand the eligibility of students at institutions of higher education to participate in SNAP.
 - Enact the Closing the College Hunger Gap Act of 2021 to support data collection on food and housing insecurity among college students, and to streamline SNAP enrollment for eligible students.

- **Research and Data:** More funding for nutrition and food insecurity research is needed to identify changes in rates of food insecurity and food assistance use, document barriers and

¹² [Childrens-HealthWatch-Preliminary-CTC-findings-vf.pdf \(childrenshealthwatch.org\)](#)

facilitators of food pantry and federal nutrition use and enrollment and develop data-driven recommendations to improve food access and equity.

- Inter-agency collaboration and data-sharing between health, housing, and anti-hunger organizations.
- Invest in and develop technological resources that communicate food access opportunities and document rates of food insecurity and program usage.
- Advance regional maps of food access networks and communicate this resource to clients Research and procure more culturally representative food.

Once again, we are grateful for the opportunity to represent the voices of Eastern Massachusetts food pantries and those who use their services. During COVID-19 we learned many lessons and the universality and funding of programs dramatically impacted our ability to respond. These policy and budget priorities for hunger-relief programs need to be increased, sustainable, and flexible. As the pandemic has greatly impacted food pantries and constituents across the state of hunger across the nation and has been exacerbated by the highest inflation impacting the cost of food, fuel, and basic needs, we hope these insights will guide the White House's conference agenda and policy decisions in order to end hunger together and allow communities to thrive by 2030.

Sincerely,

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