

**Testimony of Jen Jenkins  
Policy Advocate  
Legal Aid Society of the District of Columbia**

**Before the Committee on Human Services  
Council of the District of Columbia**

**Public Hearing Regarding:**

**Bill 24-0600  
“Give SNAP a Raise Amendment Act of 2022”**

**April 28, 2022**

The Legal Aid Society of the District of Columbia<sup>1</sup> submits the following testimony in support of Bill 24-0600, the Give SNAP a Raise Amendment Act of 2022.<sup>2</sup> This measure would increase local SNAP benefits generally as well as increase the minimum SNAP benefit amount a household could receive. This measure would have a considerable impact on the 70,480 people in the District who face hunger – with 19,250 of them being children.<sup>3</sup>

As the pandemic and its effects linger, Legal Aid applauds the Council for considering a bill to increase SNAP benefit amounts to address the inadequacy of current SNAP allotments for low-income families. Further, as a proud member of the Fair Budget Coalition, we note that the

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<sup>1</sup> The Legal Aid Society of the District of Columbia was formed in 1932 to “provide legal aid and counsel to indigent persons in civil law matters and to encourage measures by which the law may better protect and serve their needs.” Legal Aid is the oldest and largest general civil legal services program in the District of Columbia. Over the last 90 years, Legal Aid staff and volunteers have been making justice real – in individual and systemic ways – for tens of thousands of persons living in poverty in the District. The largest part of our work is comprised of individual representation in housing, domestic violence/family, public benefits, and consumer law. We also work on immigration law matters and help individuals with the collateral consequences of their involvement with the criminal justice system. From the experiences of our clients, we identify opportunities for court and law reform, public policy advocacy, and systemic litigation. More information about Legal Aid can be obtained from our website, [www.LegalAidDC.org](http://www.LegalAidDC.org), and our blog, [www.MakingJusticeReal.org](http://www.MakingJusticeReal.org).

<sup>2</sup> The Give SNAP a Raise Amendment Act of 2022, as introduced on January 3, 2022 (Bill 24-0600).

<sup>3</sup> Feeding America, What Hunger Looks Like in District Of Columbia, <https://www.feedingamerica.org/hunger-in-america/district-of-columbia-#:~:text=In District Of Columbia, 70,480,of them 19,250 are children.&text=face hunger.,to meet their food needs>

funding of this bill is included in the Fair Budget Coalition's FY23 Fair Budget Platform,<sup>4</sup> and urge the Council to take action on this legislation as soon as possible.

Legal Aid is deeply invested in ensuring that SNAP recipients receive an increase in their SNAP allotments because a significant percentage of our clients rely on the SNAP program to feed themselves or their families. For years, Legal Aid has been invested in both individual and systemic advocacy for SNAP beneficiaries. In 2022, two out of every five households that Legal Aid served reported receiving SNAP benefits, and we believe that number could be higher. In calendar year 2021, 82 individuals contacted Legal Aid for help with SNAP benefit problems.

Legal Aid's systemic work has also made a significant difference in the SNAP program. During the first year of the pandemic, Legal Aid and our pro bono partners at Alston & Bird sued the Trump administration on behalf of two SNAP beneficiaries to stop a proposed rule that would have ended SNAP benefits for nearly 700,000 adults who could not meet the proposed (unrealistic) work requirements.<sup>5</sup> Following this cruel proposed policy, the Trump Administration deployed pandemic food programs with federal emergency legislation, but as those programs wind down District residents will be thrown into greater food insecurity.<sup>6</sup>

### **Current SNAP Benefits Fail to Keep Washingtonians Food Secure**

The District's SNAP benefit amounts, which are based on the USDA's food plans model, are inadequate for many SNAP beneficiaries. The USDA has developed four food plans intended to estimate the cost of a nutritious diet across various price points—the Thrifty, Low-Cost, Moderate-Cost, and Liberal Food Plans, but these plans fail to factor in variables such as ease of access to grocery stores and local costs of food.<sup>7</sup> The Thrifty Food Plan (TFP), the basis for all SNAP benefits, is the lowest dollar amount of the four plans and is the basis for the District's

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<sup>4</sup> The Fair Budget Coalition, An Act of Justice, Budget Platform FY23, 24, *available at*: [https://fairbudget.org/wp-content/uploads/2022/03/Fair-Budget-Coalition-Budget-Platform-FY23\\_An-Act-of-Justice.pdf](https://fairbudget.org/wp-content/uploads/2022/03/Fair-Budget-Coalition-Budget-Platform-FY23_An-Act-of-Justice.pdf).

<sup>5</sup> Legal Aid Society of D.C., 2020 Annual Report, Protecting the Safety Net, *available at*: <https://2020legalaid.report/protecting-the-safety-net/>

<sup>6</sup> See Katie Lobosco, Biden Administration Winds Down Trump's Pandemic food box Program, *available at*: <https://www.cnn.com/2021/05/12/politics/usda-farmers-to-families-food-box/index.html>

<sup>7</sup> See Steven Carlson & Joseph Llobrera et al., Center on Budget and Policy Priorities, More Adequate SNAP Benefits Would Help Millions of Participants Better Afford Food, (July 15, 2021), *available at*: <https://www.cbpp.org/research/food-assistance/more-adequate-snap-benefits-would-help-millions-of-participants-better-#:~:text=WOULD HELP M...-,More Adequate SNAP Benefits Would Help Millions of Participants Better Afford Food,-UPDATED>

SNAP benefit amounts.<sup>8</sup> The TFP was created as an emergency restricted diet during the Great Depression and as a result, does not provide enough nutrition.<sup>9</sup> Moreover, the TFP is based on national cost averages, but food in D.C. is more expensive than in much of the country.<sup>10</sup> Even though there were some recent increases in the TFP, there is still a great need for an increase in SNAP benefits for Washingtonians.<sup>11</sup>

At a minimum, District residents need the increase in SNAP benefits that this measure proposes. The current average SNAP benefit in DC is \$142 per person per month, roughly \$4.50 a day.<sup>12</sup> SNAP is supposed to be supplemental to a household's food budget, but for many of the District's SNAP beneficiaries, it makes up *most or all* of their food budget, making the current TFP based allotment grossly inadequate to meet families' needs.<sup>13</sup> Making matters worse, insufficient SNAP assistance forces families to resort to less healthy options in order to stay within their limited budgets. Seventy percent of households served by Capital Area Food Bank, the District's largest hunger relief organization, reported "purchasing inexpensive, unhealthy" food as a common coping strategy for inadequate food resources.<sup>14</sup>

The lack of appropriate food resources for District households has serious health implications. For example, food insecurity can be devastating for children, who stand to benefit the most from increasing SNAP benefits. According to D.C. Hunger Solutions, the struggle to afford enough food is almost twice as high in households with children in the District as in households without

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<sup>8</sup> The Thrifty Food Plan (TFP) is the basis for all SNAP recipients, Bill 24-0600 would increase the SNAP benefit amount through supplemental local funds to the Low-Cost Food Plan.

<sup>9</sup> See Committee on Examination of the Adequacy of Food Resources and SNAP Allotments & Food and Nutrition Board; Committee on National Statistics et al., Supplemental Nutrition Assistance Program: Examining the Evidence to Define Benefit Adequacy (2013) *available at*: <https://www.ncbi.nlm.nih.gov/books/NBK206907/>

<sup>10</sup> Kate Coventry, DC Fiscal Policy Institute, DC Fails to Invest in Vital Health and Income Support Programs Despite Moment of Great Need, (Dec. 9, 2021) *available at*: <https://www.dcfpi.org/all/dc-fails-to-invest-in-vital-health-and-income-support-programs-despite-moment-of-great-need/>

<sup>11</sup> *See id.*

<sup>12</sup> Food Research and Action Center, District of Columbia, Profile of Hunger, Poverty, and Federal Nutrition Program, *available at*: [https://frac.org/research/resource-library/state-of-the-states-profiles?post\\_type=resource&p=4483&state=District%20of%20Columbia](https://frac.org/research/resource-library/state-of-the-states-profiles?post_type=resource&p=4483&state=District%20of%20Columbia).

<sup>13</sup> Feeding America, What Hunger Looks Like in District Of Columbia, <https://www.feedingamerica.org/hunger-in-america/district-of-columbia-:~:text=In District Of Columbia, 70,480,of them 19,250 are children.&text=face hunger.,to meet their food needs>.

<sup>14</sup> Capital Area Foodbank, Hunger in Our Region, <https://www.capitalareafoodbank.org/hunger-in-our-region/>

children.<sup>15</sup> Food insecure children are more likely to experience stomach aches, headaches, colds, ear infections, and fatigue.<sup>16</sup> They are sick more often, recover more slowly, and are more likely to be hospitalized.<sup>17</sup> The majority of national research has studied the impacts of food insecurity on children and found that food insecurity is associated with increased risks of some congenital disabilities, anemia, lower nutrient intakes, cognitive problems, aggression and anxiety.<sup>18</sup> Food insecurity is also associated with higher risks of being hospitalized and poorer general health and with having asthma, behavioral problems, depression, suicide ideation, and worse oral health.<sup>19</sup> These devastating costs of allowing food insecurity to prevail in the District demonstrate the urgency and necessity of this bill.

### **Increasing SNAP Would Improve the Lives and Well-being of Washingtonians**

Research shows that more adequate SNAP benefits improve participants' food security, economic security, nutrition, health, and performance in school.<sup>20</sup> For instance, in a Center on Budget and Policy Priorities (CBPP) report, economists found a significantly positive impact of a \$30-per-person increase in monthly SNAP benefits.<sup>21</sup> Moreover, higher SNAP benefit levels are linked to reduced food insecurity, increased grocery spending, greater consumption of many nutritious foods (including vegetables and lean sources of protein), and reduced fast-food consumption. The USDA found similarly positive results during a temporary increase in SNAP benefits as a result of the American Recovery and Reinvestment Act of 2009 (ARRA).<sup>22</sup> The USDA reported that while the ARRA was in place from 2008 to 2009, food expenditures by low-

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<sup>15</sup> D.C. Hunger Solutions, *Hunger in D.C.*, available at: <https://www.dchunger.org/hunger-in-dc/>

<sup>16</sup> *Id.*

<sup>17</sup> *Id.*

<sup>18</sup> Craig Gundersen & James P. Ziliak, *Food Insecurity and Health Outcomes* (2015) available at: <https://www.healthaffairs.org/doi/10.1377/hlthaff.2015.0645> - :~:text=The majority of research examining,9 and aggression and anxiety.

<sup>19</sup> *Id.*

<sup>20</sup> Food Research and Action Program, *Supplemental Nutrition and Access Program*, available at: <https://frac.org/wp-content/uploads/snap-initiatives-to-make-snap-benefits-more-adequate.pdf>.

<sup>21</sup> Patricia M. Anderson & Kristin F. Butcher, Center on Budget and Policy Priorities, *The Relationships Among SNAP Benefits, Grocery Spending, Diet Quality, and the Adequacy of Low-Income Families' Resources* (June 14, 2016) available at: <https://www.cbpp.org/research/food-assistance/the-relationships-among-snap-benefits-grocery-spending-diet-quality-and>.

<sup>22</sup> Pub. L. No. 111-5, 123 Stat. 115 (as amended).

income households increased by about 5.4 percent, and households' food insecurity declined by 2.2 percentage points.<sup>23</sup>

For an extensive list of the benefits of increasing SNAP, Legal Aid recommends that the Committee further review the Food Research Access Center's report called *Initiatives to Make SNAP Benefits More Adequate Significantly Improve Food Security, Nutrition, and Health*.<sup>24</sup>

### **SNAP Increases Complement Strategies for Ending Food Scarcity in the District**

The Committee should consider passing this measure as part of a larger strategy to end hunger in the District.<sup>25</sup> According to the Food Research Access Center, there are eight essential strategies to end hunger which include:

- creating jobs;
- raising wages;
- increasing opportunity and sharing prosperity;
- improving government income support programs for struggling families;
- strengthening SNAP;
- strengthening child nutrition programs;
- targeting supports to especially vulnerable populations;
- expanding and improving participation in federal nutrition programs;
- making sure all families have convenient access to reasonably priced, healthy food;
- and to build political will to address hunger and poverty.<sup>26</sup>

While passing this measure alone will not end the hunger crisis that plagues the District, it will be a step in the right direction.

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<sup>23</sup> Mark Nord & Mark Prell, U.S. Dep't of Agriculture, Food Security Improved the 2009 ARRA Increase in SNAP Benefits, *available at*: <https://www.ers.usda.gov/publications/pub-details/?pubid=44839>.

<sup>24</sup> Food Research Access Center, *Initiatives to Make SNAP Benefits More Adequate Significantly Improve Food Security, Nutrition, and Health*, *available at*: <https://frac.org/wp-content/uploads/snap-initiatives-to-make-snap-benefits-more-adequate.pdf>.

<sup>25</sup> *See* The Road Ahead: 2021 Update on Food Access & Food Security in the District of Columbia, *available at*: [https://dcfoodpolicycouncil.org.files.wordpress.com/2021/12/food-security-progress-report-2021\\_final.pdf](https://dcfoodpolicycouncil.org.files.wordpress.com/2021/12/food-security-progress-report-2021_final.pdf); *see also* Prince of Petworth, "The Need for a New Grocer in the Ward 7 Community is Urgent," *available at*: <https://www.popville.com/2022/01/the-need-for-a-new-grocer-in-the-ward-7-community-is-urgent/>

<sup>26</sup> Food Research & Action Center, *A Plan of Action to End Hunger in America* (2015) *available at*: <https://frac.org/wp-content/uploads/2016/10/plan-to-end-hunger-in-america.pdf>.

## **The Committee Must Continue to Monitor and Address Concerns with DHS's Administration of SNAP**

As the debate over this bill proceeds, Legal Aid strongly encourages the Council to closely oversee DHS's SNAP program administration. DHS must administer SNAP benefits efficiently and correctly, so recipients and their children do not unnecessarily face further food insecurity.

Legal Aid has testified for years during Council oversight hearings to advocate for improvements in the administration of SNAP benefits, and many of those problems remain today.<sup>27</sup> As we noted most recently in our FY21-FY22 oversight testimony, Legal Aid's clients' problems range from DHS telling our clients that their recertification was incomplete (despite the clients following the proper protocols) to DHS failing to process new SNAP applications in a timely manner.<sup>28</sup> These issues are exacerbated by language barriers, so Legal Aid maintains "know your rights" guides in English, Spanish, and Amharic so that the community can have a resource to navigate the SNAP program in the event of a language barrier.<sup>29</sup>

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<sup>27</sup> Satcha Robinson, Staff Attorney, Public Benefits Law Unit, Legal Aid Society of the District of Columbia, February 24, 2022 *available at:* <https://www.legalaiddc.org/wp-content/uploads/2022/02/Testimony-before-the-Committee-on-Human-Services-regarding-the-DHS-Satcha-Robinson.pdf>; Marcia Hollingsworth, Senior Staff Attorney, and Carolyn Rumer, Senior Staff Attorney, Public Benefits Law Unit, Legal Aid Society of the District of Columbia, March 1, 2021 *available at:* <https://www.legalaiddc.org/wp-content/uploads/2021/03/Legal-Aid-FY20-FY21YTD-Oversight-Testimony-re-DHS-ESA-Programs-FINAL.pdf>; Carolyn Rumer, Staff Attorney, Public Benefits Law Unit, Legal Aid Society of the District of Columbia, January 29, 2020 *available at:* <https://www.legalaiddc.org/wp-content/uploads/2020/02/Legal-Aid-DHS-Oversight-Testimony-FY19-FY20YTD-ESA-FINAL.pdf>; Carolyn Rumer, Equal Justice Works Fellow Sponsored by Latham and Watkins LLP, Public Benefits Unit, Legal Aid Society of the District of Columbia, March 8, 2018 *available at:* <https://www.legalaiddc.org/wp-content/uploads/2018/03/Legal-Aid-FY17-18-Performance-Oversight-Testimony-re-DHS-Service-Centers-Alliance-SNAP-FINAL.pdf>; Carolyn Rumer, Equal Justice Works Fellow Sponsored by Latham & Watkins LLP, Public Benefits Unit; Chelsea Sharon, Staff Attorney, Public Benefits Unit; Curt D. Campbell, Jr., Staff Attorney, Public Benefits Unit; and Jennifer Mezey, Supervising Attorney, Public Benefits Unit, Legal Aid Society of the District of Columbia, March 15, 2017 *available at:* <https://www.legalaiddc.org/wp-content/uploads/2017/03/CRumer.3.15.17.pdf>.

<sup>28</sup> Satcha Robinson, Staff Attorney, Public Benefits Law Unit, Legal Aid Society of the District of Columbia, February 24, 2022 *available at:* <https://www.legalaiddc.org/wp-content/uploads/2022/02/Testimony-before-the-Committee-on-Human-Services-regarding-the-DHS-Satcha-Robinson.pdf>

<sup>29</sup> Legal Aid Society of D.C., Food Stamps (SNAP) Know Your Rights!, *available at:* <https://www.legalaiddc.org/wp-content/uploads/2022/01/SNAP-KYR-Updated-December-2021.pdf>.

In addition to closely overseeing DHS's administration of the SNAP program, Legal Aid asks that the Council makes certain that DHS applies for the USDA's FY22 Process and Technology Improvement Grant, which opened its application process on April 26, 2022. These grants support efforts by state agencies and their community-based and faith-based partners to develop and implement projects that use technology to improve the quality and efficiency of SNAP operations and processes.<sup>30</sup>

### **Conclusion**

Legal Aid strongly encourages the passage of the Give SNAP a Raise Amendment Act of 2022 and offers its assistance in bringing food equity to the District.

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<sup>30</sup> U.S. Dep't of Agriculture, Food and Nutrition Service, FY 2022 SNAP Process and Technology Improvement Grants, *available at*: <https://www.fns.usda.gov/grant/fy-2022-snap-process-and-technology-improvement-grants>.