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August 7, 2020

The Honorable Nancy Pelosi  
U.S. House of Representatives  
Washington, DC 20510

The Honorable Mitch McConnell  
U.S. Senate  
Washington, DC 20510

The Honorable Kevin McCarthy  
U.S. House of Representatives  
Washington, DC 20510

The Honorable Chuck Schumer  
U.S. Senate  
Washington, DC 20510

Dear Speaker Pelosi, Minority Leader McCarthy, Majority Leader McConnell, and Minority Leader Schumer:

The COVID-19 pandemic has imprinted significant and enduring changes in how children, families, and communities access the basic nutritional supports needed to lead healthy and thriving lives. As the bipartisan membership association representing state and local public human services agencies that administer Supplemental Nutrition Assistance Program (SNAP), the American Public Human Services Association (APHSA) has witnessed the agility in which agencies have adapted systems and services to respond to unprecedented economic disruption and the resulting rise in food insecurity caused by the pandemic. The challenges we face are not going away anytime soon and as SNAP agencies are asked to transition stopgap solutions into longer-term strategies, we must equip them with the tools and resources needed to ensure families impacted by the pandemic can put food on the table.

Informed by our membership of SNAP administrators and human services leaders across all 50 states, APHSA is pleased to share this letter highlighting the SNAP policy solutions and implementation considerations that are vital to support a robust and equitable economic recovery for our country.

### **Increase Minimum and Maximum SNAP Benefits**

The economic toll of the pandemic has led to rising hunger throughout the country. As our economy experienced an unprecedented 32.9% decrease in GDP in the second quarter of 2020 and left over thirty million people unemployed,<sup>1</sup> food insecurity has disproportionately hit home among displaced workers and exacerbated racial and ethnic disparities; more than one-quarter of families experiencing

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<sup>1</sup> U.S. Department of Commerce, Bureau of Economic Analysis. *Gross Domestic Product, 2<sup>nd</sup> Quarter 2020 (Advance Estimate) and Annual Update*. July 30, 2020. <https://www.bea.gov/news/2020/gross-domestic-product-2nd-quarter-2020-advance-estimate-and-annual-update>

employment disruptions are struggling to afford food and food insecurity rates among Black and Hispanic adults are double that of white adults.<sup>2</sup>

The Families First Coronavirus Response Act (FFCRA) provided much needed flexibility for states to temporarily raise SNAP benefits for all recipients to the maximum benefit amount. However, nearly 40% of households receiving SNAP were already at the maximum benefit level and saw no increase in food assistance as a result of this change. These households have the lowest income, highest rates of food insecurity, and face systemic barriers in taking part in the country's economic recovery. In the meantime, the already rising cost of food has steepened further in recent months due to shocks in supply and demand on the food system from COVID-19.<sup>3</sup> The inability of current SNAP benefits to respond to these challenges is evidenced by the fact that 98% of food banks reported an increase in demand for food assistance and nearly 60% reported reduced inventory when the pandemic first hit.<sup>4</sup>

We must confront the inequities in our policies to support people's basic needs and promote economic mobility. And we know that SNAP benefits are one of the fastest and most effective ways to inject money into local economies. As the COVID-19 pandemic continues to threaten the economic and public health of low-income communities, increasing the maximum SNAP benefit by 15% and the minimum benefit to \$30 through the duration of the economic downturn demonstrates Congress' commitment to promoting opportunity and equity for all Americans.

### **Simplify, Extend, and Expand Pandemic EBT**

The Pandemic EBT (P-EBT) program has been a lifeline for millions of children left without access to free and reduced price meals when schools closed in the spring, and human services agencies are committed to continue meeting the nutritional needs of children while schools remain closed or in modified schedules. The challenges faced adapting a school-based meals program into a benefit card delivery system for millions of children new to human services agencies in a matter of weeks was enormous; both in the up front processes of identifying eligible children and issuing benefits, and in the on-going process of managing and updating benefits over time. And while human services agencies stepped up to meet this need, the unexpected cost of administering this program at a time when there are significant budget shortfalls has placed even further strain on state and local systems.

As plans for school reopenings are released, it is clear that millions of children throughout the country will still face barriers to access free and reduced price meals through traditional school settings in the fall. Furthermore, parents of young children who have been unable to safely access free and reduced

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<sup>2</sup> Elaine Waxman, Poonam Gupta, and Michael Karpman. *More Than One in Six Adults Were Food Insecure Two Months into the COVID-19 Recession*. Urban Institute. July 18, 2020.

<https://www.urban.org/research/publication/more-one-six-adults-were-food-insecure-two-months-covid-19-recession>

<sup>3</sup> Robert Johansson. *Another Look at Availability and Prices of Food Amid the COVID-19 Pandemic*. U.S. Department of Agriculture, Economic Research Service. May 28, 2020. <https://www.usda.gov/media/blog/2020/05/28/another-look-availability-and-prices-food-amid-covid-19-pandemic>

<sup>4</sup> Feeding America. *Feeding America Network Faces Soaring Demand, Plummeting Supply Due to COVID-19 Crisis*. April 8, 2020. <https://www.feedingamerica.org/about-us/press-room/soaring-demand-plummeting-supply>

price meals in child care settings since the start of the pandemic have gone without any financial relief to replace the nutritional supports their children would otherwise be receiving while in care. APHSA urges Congress to extend and expand authority for P-EBT through the upcoming school year so children continue to have their nutritional needs met while access to school and child care remain limited. In exercising this authority, Congress should consider the following steps to simplify the administration of P-EBT so human services agencies have the tools needed to deliver food benefits to eligible families as quickly and efficiently as possible.

- *Adjust Definition of School Closures* – The original P-EBT language in FFCRA did not foresee the possibility of modified school schedules where children may not be receiving breakfast or lunch each day of the school week. Congress should authorize P-EBT benefits for the upcoming school year both when schools are closed (i.e., fully virtual) and on modified schedules (i.e., in-person learning for limited hours or certain days). When establishing this authority, Congress should establish clear criteria for classifying a school as closed or on modified schedule for the purposes of P-EBT eligibility.
- *Establish Standard Benefit Levels for Modified School Schedules* – Congress should prescribe or grant states discretion to establish a standard per day benefit amount for children in modified school schedules. Human services agencies do not have the data necessary to issue customized benefit amounts to students based on the specific number of meals missed while in a modified school schedule or to track which students opt for virtual learning when hybrid schedules are available. Requiring states to establish mechanisms to collect this level of information would result in excessive costs and delays in benefit issuances that would be counter to the objective of the program to provide rapid relief to keep children fed.
- *Grant States Discretion to Establish Eligibility and Benefits for Children in Specified Regions* – Whereas decisions on school closures last spring generally were made statewide, school reopenings will differ this fall within different school districts. The ability for human services agencies to establish eligibility and benefit level determinations across different school districts adds significant complexity to the administration of P-EBT. Congress should give human services agencies broad discretion to work in consultation with their education agency counterparts to establish what benefit type (virtual vs. partial reopening benefit) will be used on a regional basis to try and reflect school reopening plans as accurately as possible. Should school reopening statuses change within the school year, agencies should only be expected to adjust regional eligibility and benefit determinations periodically in time intervals that reflect operational realities.
- *Provide States Options to Address Unmet Need of Child Care-Eligible Children* – States should be given options in how to address nutritional needs of young children facing barriers to accessing free and reduced price meals in child care. This could be done through providing a supplemental benefit to SNAP recipients with children under six equivalent to the average value of meals missed in child care. Congress should also provide states the option to issue P-EBT benefits to non-SNAP recipients that participate in means-tested programs at or below the income threshold for free and reduced price meals and for which reliable data is available for automatic enrollment.

### **Provide Fiscal Relief for P-EBT and SNAP Implementation**

The administrative burden of launching an entirely new P-EBT program in the midst of unprecedented increases in SNAP caseloads and plummeting state and local budgets has placed enormous financial pressure on human services agencies. The continued demand on SNAP throughout the economic recovery puts state and local decisionmakers in untenable positions to disinvest in the program at a time this could lead to delays in case processing that put families' benefits at risk and raises the likelihood for program errors. Whereas other human services systems have received limited temporarily financial relief through an increase to the Federal Medical Assistance Percentage (FMAP), SNAP programs continue to be responsible for 50% of all program administration costs in addition to bearing the added costs of running the P-EBT program.

This dynamic is simply unsustainable and we urge Congress to make a down payment in the role of SNAP in our economic recovery by investing in the systems responsible for carrying out its mission. This should be done by providing a 100% federal reimbursement of P-EBT administrative costs that human services agencies have been carrying on behalf of children and schools, and providing additional relief for SNAP implementation through a one-time infusion of administrative dollars or a temporary increase to the federal match for program administration.

### **Establish Waivers to Support SNAP Implementation for the Duration of the Pandemic**

As states look ahead to the volume of work states must manage for the remainder of the year while operating under modified business processes, the challenges states face to administer SNAP are anything but normal. These problems stem from both the early impacts of the pandemic as well as lingering effects on SNAP agencies.

- *Rapid Growth in SNAP Enrollment* – In the first three months of the pandemic, SNAP enrollment grew three times faster than any previously recorded period. This flood of applications are due for eligibility reviews in the fall.
- *Double Processing of Cases* – At the same time, eligibility reviews that were temporarily delayed since March are due to be processed in the fall, effectively doubling the number of case reviews states must handle.
- *Increased Case Reporting* – A greater degree of fluctuation in income as states attempt to reopen and adapt to conditions around the pandemic has resulted in a larger workload for SNAP agencies to manage between certification periods. This has a direct impact on staffing and timely processing beyond what is normally absorbed within program operations.
- *Reduced Capacity* – State and local agencies remain at reduced capacity while many staff work remotely in accordance with public health precautions. State budget shortfalls have resulted in hiring freezes and furloughs that further limit staff capacity and have led to local office closures in particularly hard hit areas.
- *Potential Spike in Workload* – On top of these pre-existing issues, human services agencies face another potential surge in cases as Pandemic Unemployment Compensation expires and if P-EBT is extended and expanded for the next year. For many states utilizing integrated eligibility workers



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across programs, time spent on increased SNAP caseloads will be divided across Medicaid open enrollment and the launch of the LIHEAP heating season.

Congress can take immediate action to provide the flexibilities needed for human services agencies to administer SNAP by extending authority and preserving state options to utilize waivers for SNAP interview requirements, certification periods, and simplified reporting beyond the public health emergency. These flexibilities are fundamental to giving states a range of tools that can be adapted to their specific circumstances and business processes that ensures children and families can continue to receive the benefits they need to weather the duration of the pandemic. We commend work in Congress to proactively stave off an operational crisis in SNAP through strategies such as those proposed in the *Emergency SNAP Flexibilities Extension Act (HR 7794)* and encourage the adoption of waiver flexibility language in any future COVID relief package.

### Conclusion

As Congress considers a wide range of proposals on how to leverage SNAP to support a robust and equitable economic resurgence, we urge leaders to consider the insights of state and local human services agencies on the front lines to combat hunger and food insecurity in our communities. We stand in partnership with Congress to inform tested and effective strategies for delivering nutritional supports.

Thank you for your continued dedication to supporting the health and well-being of children and families. Please reach out to Matt Lyons, Director of Policy & Research, at [mlyons@aphsa.org](mailto:mlyons@aphsa.org) to discuss opportunities to work together in the coming days and weeks.

Sincerely,

Tracy Wareing Evans

President and CEO  
American Public Human Services Association

Duke Storen

Chair, APHSA Leadership Council  
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