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## **Written Testimony: Impact of Proposed Public Charge Determination Rule Change on Hunger and Food Banks**

Submitted by Thomas Reynolds, CEO Northwest Harvest

Northwest Harvest is a statewide food justice organization, focused on creating more equitable food access for low-income people in Washington state. We provide nutritious food to 375 food pantries, meal programs, and high need schools and operate the Cherry Street Food Bank here in Seattle which serves over 5,000 visitors each week.

Northwest Harvest has an ambitious goal: we want to cut hunger in Washington in half by 2028. We know that we can't do this work alone—government nutrition assistance programs are a crucial support for struggling individuals and families. In our state, 1 in 8 Washingtonians rely on SNAP to help them buy food from grocery stores, farmers markets, and farm stands. Half of all babies in our state are born to families that are eligible for the WIC program. In 2017, 42% of all Washington students were eligible for a free or reduced-price school meal. All of these programs are necessary to feed hungry families: they provide food in situations and at times of the day or week when help from the food bank is not available. Efforts to limit participation in these programs do not reduce need—they merely shift more of the work onto the shoulders of the private sector.

But the private sector cannot substitute for SNAP and other nutrition assistance programs. Unlike food banks, SNAP is an economic generator. According to USDA, every \$1.00 of SNAP benefits spent generates \$1.79 in economic activity in the local economy, purchasing food for families in need and supporting jobs in the grocery, agriculture, and food transportation and storage industries. This proposed rule change will have a chilling effect on participation in SNAP for immigrant households with U.S. citizen born children who are eligible for this assistance. Families will go hungry, jeopardizing their health and safety because they fear that asking for assistance will be used against them. This will harm all of us: decreased spending of SNAP will result in a loss of jobs in those industries and when these families go hungry, their children will struggle with learning and adults may suffer health problems that prevent them from working.

These families will also lose out on the wonderful opportunities in our state that are helping people on SNAP eat healthier and attain gainful employment. Our state is a leader in the nation in our work that maximizes the spending of SNAP on fruits and vegetables at a large grocery store chain and at 87 farmers markets, thanks to the USDA Food Insecurity and Nutrition Incentive (FINI) grant. FINI provides bonuses for these purchases, boosting the spending power of SNAP to help SNAP recipients buy more nutritious fruits and vegetables and boosting revenue for retailers and growers. Participation in SNAP also helps recipients access our state's SNAP Employment and Training Program, which has been cited as a national model, combining case management, education classes at community colleges, and onsite job training and support to move people off SNAP and into good paying jobs.

But if immigrant families opt out of participating in SNAP, then they won't have access to these programs that will help improve their health and their abilities to move off public assistance to find jobs with self-sufficient wages.

We have seen first hand how the proposed rule change for public charge determination has this chilling effect on immigrant communities. One of our partners, the University District Food Bank, reported that when a draft of this rule was first leaked to the press earlier this year, three former clients, each with at least one immigrant member in their households, called to ask to be removed from their client services system. One of these households has U.S. citizen born children, and no one from the family had been to the food bank in quite a while because the parents had successfully found work. That family is a testament to how nutrition assistance helps our newest neighbors through a temporary rough patch until they can attain lawful employment and get the best start to settling into a new homeland while contributing to our communities.

We are deeply concerned that should this rule take effect, the result will mean that more immigrant families will drop out of the government programs for which they are lawfully eligible and drive up the need for food bank services-- if families even feel safe enough to come to us for help. This would not be sustainable for the private sector. Bread for the World has found that if it took 20 bags of food to feed a hungry family, only one of those bags is provided by alone. The rest of that support comes from SNAP, WIC, school meals, and other government programs.

When we say that charity cannot pick up the slack, we speak with authority: Northwest Harvest does not use government funding for our food distribution services. We rely entirely on private, individual and foundation support. Economic experts have projected that private resources for nonprofits will likely go down as the changes to federal tax law that disincentivize individual giving and estate planning gifts take effect. Food banks may very well end up having to shut their doors because they cannot meet the increased need for services with limited and dwindling private resources.

We urge OMB and this Administration to reverse course: this proposed rule change will only increase hunger and poverty, not just for immigrant families but for all of us.