



STRONGER COMMUNITIES. STRONGER AMERICA.

July 15, 2021

SUBMITTED TO ELECTRONIC DOCKET

Ms. Elizabeth Archuleta
Director, Office of Intergovernmental & External Affairs
U.S. Department of Agriculture
1400 Independence Avenue, SW, Washington, DC 20250

Re: Request for Information: Identifying Barriers in Programs and Services; Advancing Racial Justice and Equity and Support for Underserved Communities, Document ID: USDA-2021-0006-0001

Dear Director Archuleta,

Thank you for the opportunity to comment on how the U.S. Department of Agriculture (USDA) can advance racial justice and equity for underserved communities as part of the Agency's implementation of President Biden's Executive Order 13985.

UnidosUS, formerly the National Council of La Raza, is the nation's largest Latino civil rights and advocacy organization. Along with our Affiliate network of nearly 300 local, community-based organizations in 41 states, the District of Columbia, and Puerto Rico, UnidosUS works to build a stronger America by increasing opportunities for the nation's 58 million Latinos.

Our work includes advancing policies and programs that give more people the tools they need to be healthy and economically secure, including access to nutritious food. UnidosUS has long advocated to strengthen federal nutrition programs, such as the Supplemental Nutrition Assistance Program (SNAP) and the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), to ensure all Latinos who need access to food assistance can receive it.

Background

All children should have the opportunity to live healthy lives. However, too many children continue to lack consistent access to healthy food.

Food insecurity affects 35 million Americans, including 10.7 million children.ⁱ Prior to COVID-19, 17% of Latino children lived in a food-insecure household compared to 10.7% of non-Hispanic white children.ⁱⁱ Since the pandemic started, it is estimated that as many as 47% of Latino

households with children reported being food-insecure, the highest percentage reported for all racial and ethnic groups.ⁱⁱⁱ

Nutrition programs, such as SNAP and WIC, are crucial for reducing food insecurity among Latino children and families. More than 37 million individuals participate in SNAP, including more than 1 in 6 who are Latino.^{iv} More than 40% of WIC participants are Latino women and children.^v

UnidosUS is grateful for USDA's recent actions to address the rising rates of food insecurity due to the pandemic, including increasing benefits for both the Pandemic Electronic Benefits Transfer (P-EBT) Program and SNAP.^{vi} Yet, Latino children and families continue to encounter barriers such as misinformation and immigration-related concerns that prevent them from taking full advantage of benefits available to them.

Through the implementation of EO 13985, USDA can build on the critical gains made under recent federal relief packages to ensure that all children, including Latino children living in mixed-immigrant status households, can access healthy food at school, home, and in the community.^{vii} The following comments focus on areas that align with UnidosUS's work, in partnership with its Affiliates, to promote equitable access to food assistance programs. The comments also build on those recently submitted by UnidosUS (see attached appendix) in response to the Office of Management and Budget (OMB)'s request for information (RFI) on Advancing Racial Equity and Support for Underserved Communities Through the Federal Government.

Below, we provide additional input on the following points that reflect UnidosUS and its Affiliates' work to reduce food insecurity among Latino children and families.

Barriers to participation in federal nutrition programs impede Latino's access

Such barriers include:

- **Limited access to and availability of culturally responsive and linguistically appropriate information.** More than 4 million Latinos are eligible but unenrolled in SNAP.^{viii} In addition, participation in WIC among those eligible for the program has declined over the past decade.^{ix} Limited resources to conduct outreach, lack of awareness of eligibility requirements, and limited information in Spanish-language about federal nutrition programs keep many eligible families from being able to access healthy food.
- **Concerns related to immigration status.** While a vast majority of Hispanic children are citizens (95%), nearly half live in mixed immigrant status households (*i.e.*, with at least one noncitizen parent).^x Eligible families avoid food assistance programs due to concerns related to immigration status, misinformation about the status of the public charge rule, and confusion about their eligibility for program benefits.^{xi} Enforcement and administrative actions under the Trump Administration contributed to a 10% decrease in eligible SNAP enrollment and a concurrent increase in child food insecurity among immigrant families.^{xii}

These barriers contribute significantly to leaving Latino children particularly vulnerable to food insecurity.

- **A wide digital divide.** About 21 million Latinos lack a reliable home internet connection.^{xiii} States like Texas are also requiring SNAP applicants to print out, sign, and upload a form online to authorize navigators, including UnidosUS Affiliates, to assist them with their applications remotely. Limited access to computers, low levels of computer literacy, and limited access to high-speed internet increase barriers to food assistance for Latino families. When many local SNAP offices closed due to the pandemic, many Latino families had trouble accessing or using a computer to complete SNAP applications online or had difficulty using a state’s complex online portal system to upload documents for SNAP applications.
- **Limited transportation.** UnidosUS’s Affiliates who provide direct enrollment assistance to the Latino community for federal nutrition programs, such as SNAP, report that many state and local food distribution sites are inaccessible by public transit.^{xiv} Many of these sites require a car to pick up food to minimize COVID exposure, leaving out families without vehicles. In addition, the hours of operation at food distribution sites are inconvenient for farmworkers, many of whom are Latino who work long hours and are unable to pick up food.

USDA has meaningful opportunities to increase access to federal nutrition programs

The USDA should:

Raise awareness about existing Tri-Agency guidance making clear eligibility for benefits.

While the Biden-Harris Administration reversed the Trump Administration’s public charge rule, the chilling effect stemming from the rule remains. We appreciate USDA’s recent efforts to inform states about the Department of Homeland Security’s (DHS) reversal of the public charge rule.^{xv} Further increasing awareness about the federal Tri-Agency guidance via webinar trainings or technical assistance would clarify for state agencies that applicants who lack a social security number can still apply for benefits on behalf of eligible beneficiaries, such as their U.S. citizen children.^{xvi} We also urge USDA to continue monitoring how state agencies are using the Tri-Agency guidance to see if additional clarifying language is needed in order to ensure that all Latinos eligible for food assistance can receive it.

Strengthen culturally competent and linguistically appropriate outreach

- **WIC.** As noted in our March 19, 2021 letter to USDA, we urge USDA to dedicate a portion of the \$390 million investment made under the American Rescue Plan Act (ARP) for WIC outreach innovation and program modernization to support trusted, community-based organizations (CBOs) that provide culturally responsive and linguistically appropriate outreach to Latino and mixed-immigrant-status households on WIC eligibility and enrollment.

- **SNAP.** Currently, state agencies can receive up to 50% of federal matching funds to create and implement SNAP outreach plans in partnership with community-based partners.^{xvii} We appreciate USDA’s recent memo on priority areas for states to consider as they develop their FY 2022 outreach plans, including encouraging states to partner with trusted community-based organizations that serve immigrant populations.^{xviii} Yet additional funding is needed to capacitate trusted CBOs serving Latino and immigrant communities to provide culturally and linguistically appropriate outreach, education, and enrollment to ensure that all eligible families are aware of and can apply for SNAP. As highlighted in our March 19, 2021 letter to USDA, we urge the Agency to release fully funded competitive SNAP outreach grants previously utilized under the Clinton and Bush Administrations to support outreach to low-income Latino, mixed-immigrant-status families, and other under-participating groups.

- **School meals.** Limited language-access services and outreach today prevent many eligible Latino children from participating in food assistance programs, including the National School Lunch Program (NSLP). More than 3 in 4 of the nearly 5 million English learners (ELs) who attend a public school are Latino.^{xix} Targeting funding to support an intentional, culturally competent public outreach campaign to increase enrollment in the NSLP would also help improve identification of students who would benefit from P-EBT and provide more accurate data on which schools are eligible for the Community Eligibility Provision (CEP) and can provide free school meals. Nearly one in three eligible schools do not participate in CEP.^{xx}

- **P-EBT.** We appreciate USDA’s guidance for states to detail in P-EBT outreach plans how they will serve groups with potential access issues, including children without social security numbers, children who are limited English proficient (LEP), and households without internet access. We urge USDA to continue to monitor the implementation of state P-EBT plans to ensure that all Latino children eligible for P-EBT, including those living in mixed immigrant status families and those who live in households with limited internet access, are able to access healthy food when schools or childcare centers are closed. As noted in our May 25, 2021 memo to USDA, we also urge USDA to raise awareness among state agencies that all families affected by school or childcare closures are eligible for P-EBT, regardless of their immigration status. These changes would help reduce confusion around eligibility for food assistance programs.

USDA should also:

- **Issue guidance on remote application assistance.** Remote enrollment assistance should be accessible regardless of one’s digital access or level of digital literacy. Because many Latino families lack a computer or internet access and thus need assistance to apply remotely, further guidance should be provided on how states must address, in SNAP, WIC, and P-EBT outreach plans, how they will ensure that such families can receive remote application assistance from state outreach partners over the phone and without facing administrative hurdles. State outreach partners, such as community-based

organizations (CBOs), serve as trusted resources for Latino and immigrant communities and could be used by USDA to assist with enrollment.

- **Expand direct certification with Medicaid, WIC, and SNAP.** In 2018, 55% of Latino children were covered by Medicaid/CHIP, compared to lower participation rates in SNAP and the Temporary Assistance for Needy Families (TANF) program.^{xxi} We urge USDA to use its demonstration authority to expand direct certification to Medicaid, WIC, and SNAP to ensure that many more eligible food-insecure children can access food.

USDA can and should maximize opportunities to engage with Latino and immigrant communities

USDA should:

- **Hold recurring meetings with Latino and immigrant-serving organizations.** We thank USDA for the work done thus far in convening stakeholders to discuss outreach strategies targeting underserved communities. We urge USDA to convene meetings on a recurring basis with state and national advocacy organizations that represent and serve Latino and immigrant communities to identify barriers, challenges, and best practices to ensure low-income, food insecure children and families have equitable access to federal nutrition programs.

USDA has the opportunity not only to address the urgent needs of families now, but also to bolster future benefits by taking immediate action to remove barriers and increase participation in federal nutrition programs, such as SNAP.

Investments today to strengthen nutrition assistance programs will help ensure that Latino and mixed-immigrant-status households have access to food and an opportunity for a bright, healthy, and productive future. For further input on ways that federal agencies such as USDA may advance racial justice and equity, please review UnidosUS's recent comments to OMB, attached herein as an appendix.

Thank you for your attention, and should you have any questions or need any further information, please contact Alberto Gonzalez at agonzalez@unidosus.org.

Sincerely,



Eric Rodriguez
Senior Vice President
UnidosUS

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