Good morning Chairwoman Hayes, Ranking Member Bacon, and distinguished Members of the Subcommittee. My name is Daniel R. Giacomi, and I am the Supplemental Nutrition Assistance Program (SNAP) Program Administration Manager for the Connecticut Department of Social Services (DSS). I am honored to appear before you today to offer testimony concerning a stakeholder’s perspective on SNAP.

DSS is the state agency responsible for administering SNAP in Connecticut. We currently provide SNAP assistance to one in ten Connecticut residents – approximately 373,000 individuals in over 217,000 households in all 169 towns. As the SNAP administrator in Connecticut, DSS has first-hand knowledge of the complexities involved in determining eligibility for SNAP as well as creating and implementing SNAP policies, especially in comparison to other means-tested programs. SNAP eligibility is complicated largely because SNAP relies upon multiple eligibility factors and deductions and provides a benefit on a sliding scale rather than a flat grant. This experience informs our perspective on the administration changes to the program in the 2018 Farm Bill. But, more importantly, DSS has first-hand knowledge of how SNAP significantly reduces food insecurity in our state and stimulates local economies—particularly during times of economic downturns—as well as how SNAP improves health outcomes and supports individuals in all aspects of life, by providing essential nutrition to many working families, children, and elderly adults.

We would like to commend Congress for the actions taken in the 2018 Farm Bill and in the ensuing years that gave Connecticut the tools we so critically needed to meet the unprecedented challenges we have faced in recent years. In addition, the temporary flexibilities Congress enacted to increase SNAP benefits and adjust administrative rules early in the public health emergency meant that Connecticut DSS could preserve access to meaningful food assistance benefits for families while operating under the social and economic disruptions we experienced early in the pandemic. As we continue to phase out these flexibilities, Congress’ foresight in the 2018 Farm Bill to direct USDA to update the Thrifty Food Plan is now helping SNAP benefits better keep pace with the rising cost of food in our country. This has undoubtedly supported the health and well-being of millions of Americans, but also was key to supporting local retailers in the economic recovery. SNAP remains one of the most effective tools at our disposal to boost the food industry and broader economy quickly and efficiently. We firmly believe that the actions Congress took were fundamental to SNAP being one of the true success stories of our country’s pandemic response.
Food insecurity in Connecticut, like many states, rose significantly as a result of the COVID-19 pandemic, as evidenced in a report published in September 2021 by our partners at CT Foodshare’s Institute for Hunger & Research Solutions. Results from this study showed an overall 31% increase in food insecurity one year into the pandemic. Food insecurity was also greater in respondent households with children under age 18 (44%) compared to respondent households without a child (24%) and is greater in respondent households with people of color (43%) compared to respondent households where all members are white (26%). Heightened food insecurity is also demonstrated by the volume of applications for SNAP assistance that we have received since the start of the pandemic. During the early days of the pandemic, DSS experienced a high of nearly 4,700 applications arriving weekly, a 330% increase from the number of SNAP applications received weekly in the period directly preceding the start of the pandemic, and we continue to receive over 3,000 applications per week a 176% increase from the number of SNAP applications received weekly in the period directly preceding the start of the pandemic.

**Reflection on the 2018 Farm Bill**

The 2018 Farm Bill has helped state agencies strengthen the impact of SNAP in many ways, both here in Connecticut and nationwide. First, as previously mentioned, the 2018 Farm Bill triggered a review of the Thrifty Food Plan (TFP), the first review in 46 years. For context, when the previous review was undertaken, a loaf of bread was $0.28, a dozen eggs cost $0.77, and milk was $1.40 per gallon. The TFP review resulted in a modest increase in SNAP benefits equating, generally, to between $12 and $16 per person, per month. While this may not seem like an enormous increase to some, it was especially important at a time when the pandemic closed businesses and shut down offices, causing many individuals to lose work, be furloughed, or experience reduced hours, which in turn made them unable to meet their families’ needs. Research from the previously mentioned CT Foodshare report showed that, one year since the onset of the pandemic, approximately one third of Connecticut residents were still experiencing a job disruption, with many changing shopping frequencies or purchasing habits, or relying on SNAP assistance. In addition, of the responses received in this report, 22% of the households indicated that they received SNAP benefits in the three months prior with nearly half of those respondents also said they had to seek additional food assistance, such as going to a food pantry, because their monthly SNAP benefits ran out before they received more. While we continue to make progress recovering from the economic disruption of the pandemic, we now face record inflation placing further strain on the shoulders of families trying to feed their families. The greatest increase in food costs have come in food prepared at home, where costs as of March of this year are 10% more than they were last year. That is why I believe the long-overdue review of the TFP was necessary and timely.

In addition to directly alleviating hunger at a time of significant societal disruption, the modest increase to the SNAP benefit resulting from the TFP review was important for broader economic and public health reasons. Research has shown that when SNAP benefits are increased, food expenditures increase, and when SNAP benefits are decreased, such as after the expiration of the SNAP benefit increase from

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2. [https://www.bls.gov/news.release/cpi.nr0.htm](https://www.bls.gov/news.release/cpi.nr0.htm)
the American Recovery and Reinvestment Act of 2009, food expenditures also decline, decreasing the affordability of a healthy diet.\(^3\) Additionally, it is known that when food insecurity is reduced, people are less likely to suffer from chronic illnesses such as Type 2 Diabetes, hypertension, high cholesterol, and heart and kidney disease. Additionally, “access to [SNAP] in childhood leads to a significant reduction in the incidence of “metabolic syndrome” (obesity, high blood pressure, and diabetes) and, for women, an increase in economic self-sufficiency."\(^4\) Conversely, food insecurity is directly linked to poorer general and mental health.\(^5\) In fact, a study done by the USDA found that, in some cases, the level of a person’s food security was an even greater predictor of chronic illness than income. “Income is significantly associated with only 3 of the 10 chronic diseases — hepatitis, arthritis, and COPD—while food insecurity is significantly associated with all 10.”\(^6\)

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Improving access to nutritious food, in turn, leads to reduced healthcare spending, reduced likelihood of hospital visits, and overall better long-term health outcomes. In research released by USDA, 88% of SNAP participants reported facing at least one barrier to achieving a healthy diet throughout the month, with the most common barrier (reported by 61% of SNAP participants) being the affordability of healthy foods such as lean meat and fresh fruits and vegetables.\(^7\) Increasing families’ ability to afford nutritious food also brings better long-term health outcomes to future generations, as children who receive SNAP have improved health outcomes and higher educational attainment when compared to children not in SNAP households.\(^5\)

The second area of the 2018 Farm Bill that I wish to touch on is the investment and changes in the SNAP Employment and Training (E&T) program. The Connecticut SNAP population is a diverse group with varying degrees of work readiness. In response, DSS’ voluntary SNAP E&T program is designed to help SNAP recipients gain valuable skills needed for self-sufficiency. Connecticut’s SNAP E&T program meets the wide range of work-related services needed by its SNAP participants by offering over 60 short-term vocational programs that are job focused and employer driven. Offerings range from 1-day security guard programs to 2-year associates degrees. In Connecticut, these activities are delivered through diverse partnerships with nonprofit community-based organizations and a private nonprofit college. In addition, in 2018, Connecticut became one of the first states in the nation to partner with every community college within the state’s college and university system, a process that began in 2011 and has become the pillar of our SNAP E&T program. With the flexibilities afforded through the 2018 Farm Bill, we are now exploring additional partnerships in the areas of pre-apprenticeships, apprenticeships and subsidized employment, services that we were unable to offer until the recent Farm Bill Changes. However, because income from participating in these programs would often result in individuals becoming ineligible for SNAP, we are unable to support many participants through their successful completion of job training programs. To help ensure SNAP E&T can be more effective in helping families succeed for the long-term, I urge Congress to revisit ways we can tackle benefit cliffs by disregarding income while households participate in SNAP E&T programs.

Also, as required by the 2018 Farm Bill, Connecticut’s SNAP E&T partners now provide case management services that are unique to SNAP E&T participants and help each participant succeed in their employment and training activities. These services include employability assessments, individualized service plans, progress monitoring, monthly case notes, and coordination with other service providers as well as referrals for Adult Basic Education or other support services that enable the participant to remain engaged in his or her employment or training activity. The on-site case management services identify, and address barriers faced by participants. Providing these additional supportive services and removing barriers supports participants’ completion of their SNAP E&T program and has produced many success stories in the Connecticut E&T program.

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One recent success story involves a 39-year-old enrollee residing in Hartford, Connecticut who was a participant of Capital Workforce Partners’ Integrated Basic Education and Skills Training (BEST Chance) program. The BEST Chance Program is an initiative that provides manufacturing, construction, carpentry, and culinary training for individuals attempting to re-enter the work force after incarceration with an emphasis on 18–24-year-old individuals in the Hartford area. This particular individual registered with the SNAP E&T program’s three-month pre-manufacturing course at Manchester Community College in September 2019, looking for a second chance and hoping to gain self-sufficiency through a new career. After completing training, she began her supervised job search phase and endured multiple rejections due to a previous felony record. In spite of the rejections, she persevered and, with the assistance of the SNAP E&T program and Capital Workforce Partners, continued to look for manufacturing jobs. In April 2020, she secured an employment offer from Boat Works of South Windsor, Inc. despite the uncertain work environment caused by COVID-19. She is making above minimum wage in Connecticut and is hoping that her hard work and perseverance will continue to move her forward in her new profession.

Another such success story involves a young woman living in New Haven County. Having already obtained her bachelor’s degree, she was enrolled in an MBA program and working as a bank teller, both part-time, when she became pregnant with her first child, who was born in March 2016. She transferred to an accelerated MBA program, and her second son was born in 2017. Being both a full-time student and mother to two young children became a challenge, and she had to quit her job and apply for SNAP benefits. She persevered and obtained her MBA in 2018. However, with no recent work history, finding employment in her field was difficult. She finally found employment; first a sales job, and next as an operations manager at Michaels on her way to her “dream Job”: Senior Operations Manager at Amazon. She applied, unsuccessfully, for several Amazon positions that often required Six Sigma Certification, which she did not have. She then remembered and enrolled in Gateway Community College’s SNAP E&T Business Professional and Office Assistant Training Certification program which included Six Sigma White Belt Certification. Through this program, she was hired by Amazon in October 2020 and is currently an Operations Manager II, on her way to her dream job.

It is through this Committee’s funding and support for the SNAP E&T program in the 2018 Farm Bill that these individuals and others like them have been able to achieve goals they once thought unattainable. But SNAP E&T remains a program that is early in its growth and there remains opportunity for us to do more. With additional 100% SNAP E&T funding appropriated by Congress, Connecticut could increase the number of community providers, types of services, and percentage of SNAP participants reached. In addition, there’s more we can do to make work pay and support SNAP participants working in earnest to achieve family-sustaining wages. While our ability to offer apprenticeships and subsidized employment is a critical new tool provided to SNAP E&T programs through the 2018 Farm Bill, many SNAP households would lose their eligibility as a result of participating in such a program. As noted previously, Congress can help mitigate benefit cliffs and support SNAP recipients’ long-term success by excluding income from these SNAP E&T components while participants work towards the goal of self-sufficiency.

A third change made by the 2018 Farm Bill that has been of significant importance during the past 24 months concerns the expanded approval of access to online purchasing for redeeming SNAP benefits. At the beginning of the COVID-19 public health emergency, when families stayed home to help our state stop the spread of the virus, DSS was inundated with phone calls, emails, and letters from individuals across the state looking for ways to safely obtain groceries, particularly for households that included children or elderly individuals as well as those households that included disabled or immunocompromised individuals. The pandemic exacerbated an existing issue for many SNAP households: limited access to transportation and availability of nearby grocery-store options.

Thankfully, a move towards online purchasing was already underway at the beginning of the pandemic because the 2014 Farm Bill authorized a pilot program to test online purchasing, and the 2018 Farm Bill moved it towards nationwide implementation. Accordingly, there was already a framework of SNAP-participating vendors who were able to rapidly scale up the online-purchasing pilot such that an estimated 90% of SNAP participants lived in states that had implemented the pilot by June of 2020, including Connecticut.9 In Connecticut, the online purchasing pilot began with three retailers and has since expanded to ten, including both local and national retailers as well as a partnership with a nationwide grocery delivery service. This pilot provided a critical opportunity for states to experiment and modernize services in a way that has proven to be beneficial for clients and for the country’s overall public health. 49 states, as well as the District of Columbia, have now signed on to participate and offer this critical tool to their residents, with the majority having done so by the end of 2020. As access to the pilot expanded during 2020, so did use of online SNAP purchasing. In February 2020, the earliest month for which data is available, households redeemed less than $3 million in SNAP benefits online, accounting for less than 0.1% of all benefits redeemed that month. This value grew exponentially through June 2020, when online SNAP and P-EBT redemptions totaled $154 million, or 1.6% of total redemptions. Online redemptions grew each subsequent month through December 2020 to $246 million—86 times the value in February.9

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However, this pilot is not without its challenges. The biggest being that at the moment participants must pay out of their own pocket for delivery, convenience, or service fees which, over time, may disproportionately impact elderly and disabled individuals and others with mobility barriers. These charges can vary greatly depending on order size, membership or subscription plans, flat rates, etc. In addition, placing an order online is difficult without a bank account or access to credit, because having a debit or credit card apart from a SNAP EBT card is often needed to cover delivery fees and other fees. This issue is exacerbated by the fact that, for the majority of states operating in the pilot, we still do not have the ability to allow our SNAP participants to use any non-SNAP cash funds that they may have associated with their EBT account for these purchases. I urge the committee to direct USDA to establish a demonstration project that explores subsidizing fees fully or partially for purchases made online with SNAP benefits in order to support additional access to online food options for those who are often most in need of those services.

Looking Ahead: The 2023 Farm Bill

The next reauthorization of the Farm Bill presents the opportunity to review the program with the benefit of the lessons learned during the temporary government shutdown of 2019 as well as the COVID-19 pandemic that began in 2020. The experience of administering the program during the shutdown and the pandemic has demonstrated the value and importance of program innovations, some of which should be made permanent, but has also revealed additional steps that could be taken to strengthen the program in the future, making it more resilient in times of greater need and able to include vulnerable groups that have long been overlooked. Significant improvements can and should be considered in areas that would foster innovation,

streamline service delivery, and simplify the administration of the program, as well as ensure its integrity and stability.

- First and foremost, it is critical that we preserve access to Broad-Based Categorical Eligibility (BBCE) and the alignment of services with programs such as TANF and the National School Lunch Program as doing so greatly simplifies access to SNAP especially for working families, seniors, and people with disabilities. BBCE directly benefits nearly 65,000 low-income Connecticut residents, 35% of whom are aged birth – 18, as well as millions of Americans across the vast majority of states that rely on this flexibility. It helps working families by eliminating a “benefit cliff” and lets low-income households accrue savings to avoid debt, prepare for unexpected events, and become self-sufficient. In addition, it reduces the administrative burden on states processing SNAP applications, changes, and renewals which correlates to a direct reduction in SNAP administrative costs per case of which the state and federal government each pay a share.

- Second, we should build upon and make permanent proven demonstration projects, such as the Elderly Simplified Application Project (ESAP) and Combined Application Project (CAP), which streamline access to SNAP for vulnerable households while simultaneously cutting down on administrative expenses and increasing timeliness of case processing. In addition, other means-tested programs such as TANF, Medicaid, or WIC should be looked at to determine whether cross enrollment, or automatic enrollment, would be appropriate and efficient in ensuring individuals receive all of the assistance they need without the burden of filling out multiple applications and providing the same verifications multiple times, again reducing the SNAP administrative costs per case rates.

- We also need to modify and expand the policies around access to SNAP benefits for college students and Veterans with disabilities. With the demographic makeup and rising expenses faced by the college student population as well as increase in Veterans of working-age with a service-connected disability, more should be done to ensure these individuals do not go hungry. In a report published in February 2020, one-third of all respondents at the University of Connecticut reported low or very low food security as measured by items from the USDA’s standard assessment tool. This same report showed that students who are food insecure were more likely to report that they have missed class, missed assignments, and have considered dropping out. In response to the COVID-19 pandemic, The Consolidated Appropriations Act of 2021 temporarily expanded student eligibility to students applying for SNAP benefits who were eligible to participate in a state or federally funded work study, as well as those who have an expected family contribution (EFC) of $0, exemptions not otherwise offered to this population. Through partnerships with our colleges and universities, DSS was able to quickly identify and provide direct outreach to nearly 27,600 students in Connecticut that fit these categories and otherwise may not have been eligible for SNAP benefits. Likewise, in a recent USDA study, it was found that food insecurity was 22.5% higher among disabled working-age Veterans than the

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average for all working-age Veterans. This is significant in that in 2019, over 13 million Veterans were of working age and one of the fastest growing and youngest groups of Veterans—those who served after September 11, 2001—is more likely to have a service-connected disability than Veterans from other service periods.\textsuperscript{12} While DSS does provide support and SNAP outreach assistance in areas such as standdown events, we believe an expansion of SNAP eligibility to more service-connected disabled, elderly and housebound Veterans will help to ensure those individuals have the support and access to food that they deserve.

- **Allow for the purchase of hot/prepared foods outside of the Restaurant Meals Program.** Since the passage of the Food Stamp Act in 1964, Americans’ shopping and eating habits have evolved, and SNAP families need convenience and faster meal-preparation. In addition, the rule, as it is currently interpreted does not consider whether the food will or even can be consumed on premises or taken home to be eaten. This restriction is most harmful to our homeless population that often do not have the means to prepare their foods, as well as those recovering from a natural disaster or event that renders their home uninhabitable and therefore lack convenient access to a kitchen or the ability to heat up foods. These families are among those most in need and most struggle with the ability to utilize their benefits. Instead, they rely upon the ingenuity and kindness of store owners and clerks to resort to loopholes such as the complimentary heating of food after purchase. Also, it was evident at the onset of the pandemic, when grocery stores were struggling to keep shelves stocked, that the inability to purchase hot and prepared foods was a major problem for SNAP participants. Allowing the purchase of hot or prepared foods outside of a fast-food setting, such as the salad bar in grocery stores and supermarkets, or the often talked about rotisserie chicken, would give these individuals and all SNAP recipients the same flexibility that other Americans depend upon.

\textsuperscript{12} https://www.ers.usda.gov/webdocs/publications/101269/err-829.pdf?v=6491.5
Finally, the adaptations made over the past two years in response to the public health emergency have helped us better understand ways we can **adjust program rules to meet the needs of our customers more flexibly**. Opportunities are needed to further test and evaluate innovative approaches to interviews, change reporting, Periodic Report Forms, and telephonic signatures to provide space for states to transition out of the public health emergency leveraging the lessons we have learned. For example, many states already operate Combined Application Projects (CAP), state-demonstration programs that aim to increase SNAP participation among SSI recipients by enrolling them automatically into SNAP. These “demonstration projects” have been operating for 27 years and have proven very successful in increasing food stamp participation among SSI recipients. However, it is severely underutilized with only 17 states having some version of the CAP in place. This should become a regular component of the program with no cost neutrality, a provision in demonstration projects where states have to evaluate data to ensure the project should not cost more than it would have cost to add new participants under the regular SNAP program. In addition, other means-tested programs such as TANF, Medicaid, or WIC should be looked at to determine whether cross enrollment, or automatic enrollment, would be appropriate and efficient in ensuring individuals receive all of the assistance they need without the burden of filling out multiple applications and providing the same verifications multiple times to multiple agencies. This is especially important as state agencies, like many industries, face challenges in recruiting and retaining staff. Collectively, we need to think differently about the way we properly invest in technology and partnerships to ensure we continue to deliver on our core mission while doing more with less.

At the same time that we focus on common sense approaches to simplifying SNAP, states are committed to maintaining program integrity as a top priority. The public health emergency forced Connecticut to temporarily adapt many of our program rules to ensure families could continue to access their benefits safely and reliably. But through it all, we have continued to prioritize conducting quality control reviews, completing reviews both on the federal and state levels throughout the pandemic, and participating in quarterly trainings with FNS staff in a multitude of QC areas including Able-Bodied Adults Without Dependents (ABAWDs). In fact, we have doubled down on these investments, adding 5 new review staff members in the past year, and resuming a state process on hold since 2016 that requires DSS eligibility supervisors to each review at least 20 SNAP cases each month processed by both new and seasoned staff members to ensure robust case reviews are completed and program integrity remains at the forefront. As we get closer to the end of the public health emergency and approach a new normal in our program operations, we are in a strong position to continue our progress maintaining program integrity as we see it already providing results seen in the USDA’s current posted payment error rates showing Connecticut’s FY2022 error rate well below the national average.

Looking ahead, Congress can assist states in their efforts to promote program integrity by helping equip them with tools that help maintain accuracy and prevent fraud in the program. I applaud Congress for
the investments made in the 2018 Farm Bill to create a National Accuracy Clearinghouse (NAC) that helps states identify and pursue individuals that seek to obtain SNAP benefits in multiple states, a process manually done today via email and faxed requests. The early efforts to scale this project have been promising and Connecticut looks forward to utilizing the lessons learned from the pilot states as we integrate our eligibility system into the NAC as it becomes nationwide. I also urge the Committee to support the USDA in advancing strategies that help states make optimal use of third-party income databases that can quickly identify earned income of SNAP participants, both improving program integrity and streamlining the enrollment process for households. Lastly, as fraudsters find new ways to steal SNAP participants’ benefits through tactics such as identify theft and card cloning or skimming, Congress can help support states with the staffing and technology resources needed to detect, prevent, catch, and enforce penalties against these attempts to defraud the program while ensuring those unknowingly victimized by these individuals or groups do not lose the benefits to which they are entitled.

Conclusion

While the areas above reflect some extremely important areas of the SNAP program, they by no means represent a comprehensive list of programmatic areas or policies that can be implemented or modified to strengthen and improve an essential entitlement utilized by millions of Americans each month. Coming out of the COVID-19 pandemic, during a time when the percentage of the aging workforce continues to grow and the number of individuals leaving the workforce increases, as well as a time where the Farm Bill is up for reauthorization, states and this committee are at an inflection point where we have both tremendous opportunities to modernize and streamline the program to provide more equitable and effective services while also facing the threat of workforce challenges and complex requirements that that threaten to stymie progress.

The actions of this committee through the reauthorization of the Farm Bill in 2023 will play a crucial role in helping to unlock the potential advancements we can make in SNAP in the coming years, modernizing the program and its eligibility requirements while not sacrificing program integrity. It can do so by ensuring regular reviews and updates to the Thrifty Food Plan, continuing to expand the funding flexibility and range of SNAP E&T, modernizing the program by making permanent and providing support for no-cost online purchasing, maintaining the vital program simplification rules that helped us through the pandemic: BBCE, ESAP, expanded student eligibility, and interview/process streamlining, investing in new ways to help states stop more sophisticated electronic fraud techniques, and ensuring durable program stability for this critical part of the social safety net as clearly demonstrated during the program’s success both before and during the pandemic.