

Statement by MAZON: A Jewish Response to Hunger

On

The Recommendations of the Military Compensation and Retirement Modernization Commission
Regarding the Family Subsistence Supplemental Allowance Program

Submitted by:

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MAZON: A Jewish Response to Hunger

March 23, 2015

About MAZON

MAZON: A Jewish Response to Hunger is a national nonprofit organization working to end hunger among people of all faiths and backgrounds in the United States and Israel

MAZON, which means “food” in Hebrew, was the first national organization to rally the American Jewish community around the issue of hunger, and remains the only national Jewish organization dedicated exclusively to that same cause.

Since its founding in 1985, MAZON has established itself as a leader in the national anti-hunger movement. MAZON founded and continues to chair NAHO (National Association of Hunger Organizations) and participates in a number of other anti-hunger and interfaith coalitions. It also works in close collaboration with interfaith agencies of all denominations to advocate on behalf of hungry families nationwide.

MAZON works to ensure that hungry people have access to the resources they need to survive while simultaneously striving to develop and advance long-term solutions that will end hunger once and for all. It employs a holistic approach to accomplishing its mission, which it demonstrates through its three interrelated strategies: Strategic Initiatives, Partnership Grantmaking and Education and Advocacy.

Central components of MAZON's mission are:

- **To provide for people who are hungry while at the same time advocating for other ways to end hunger and its causes**
- **To educate and raise the consciousness of the Jewish community regarding its obligation to alleviate hunger and its causes**

In 2013, the Board of Directors of MAZON: A Jewish Response to Hunger voted unanimously to make addressing military hunger one of its two education and advocacy priorities for at least the next five years. Following that decision, the Board and staff of MAZON have invested significant time and resources to gather information and insights from across the country about the ways in which food insecurity is felt among military families and the underlying causes for it.

Certification of Non-Receipt of Federal Funds

Pursuant to the requirements of House Rule XI, MAZON: A Jewish Response to Hunger has not received any federal grant or contract during the current fiscal year or either of the two previous fiscal years.

Statement About MCRMC Recommendations for the FSSA Program

As members of the House Armed Services Committee consider responses to the recommendations made in the final report of the Military Compensation and Retirement Modernization Commission (MCRMC), MAZON: A Jewish Response to Hunger would like to call your attention to the simplistic and inadequate recommendation to eliminate the Department of Defense's Family Subsistence Supplemental Allowance (FSSA) program where SNAP is available. Rather than explore vital and viable solutions for military families who struggle to put food on the table, MCRMC has offered a response that is both non-responsive and does nothing to affect the persistent problem of food insecurity among military families.

While we appreciate the work of MCRMC to research the issue of food insecurity among military families and agree with its assessment that FSSA is badly flawed, we strongly disagree with the Commission's recommendations to sunset the FSSA program domestically and instead direct military families toward participation in the SNAP program. The MCRMC report fails to consider the unique challenges for military households that are forced to rely on government safety net programs and the impact on those who fall through the cracks of these programs.

Far too many military families in need find themselves ineligible for both the FSSA and SNAP programs or qualify for an insufficient benefit amount, due in large part to the inclusion of the Basic Allowance for Housing Benefit as countable income in the determination of program eligibility. The only alternative now is for the many thousands of military families in need to resort to emergency assistance through food pantries that operate distribution programs on or near military installations across the country. At Camp Pendleton alone, four separate emergency distribution programs operate on base to offer monthly food packages exclusively to active duty military families in need. Surely we can do better for those who sacrifice so much for our country.

Raising the base rates of pay for junior enlisted personnel would be the most direct solution to this problem, though the costs of such action would be high and politically challenging. Action to sunset the FSSA program domestically without adjusting the SNAP eligibility criteria for military families (excluding the BAH benefit as income) will do nothing to address the current intolerable situation of far too many military families turning in desperation to food pantries to feed their children.

As an alternative to salary increases, MAZON: A Jewish Response to Hunger believes that several simple steps can and will transform the Department of Defense's Family Subsistence Supplemental Allowance (FSSA) program, going a long way toward meeting the military's obligation to those who serve our country. A few straightforward changes will ensure that the program lives up to its promise and make FSSA far more effective, efficient and, most important, wholly supportive of our military personnel without rancor or stigma. MAZON urges Congress to take action immediately to investigate the unaddressed problem of food insecurity among military families, make recommendations to regularly collect necessary data to understand the scope and characteristics of the problem, and implement reforms needed to transform the broken FSSA program so that it effectively addresses the issue.

The FSSA program was created with the stated goal of ending participation by members of the United States military in the Supplemental Nutrition Assistance Program administered by the U.S. Department of Agriculture. The FSSA program has failed to meet that simple goal, as is reflected by a comparison of historical participation numbers for SNAP and FSSA:

Year	Program		DIFFERENCE
	FSSA	SNAP (FY)	
2000	-	1000	-
2001	610	-	-
2002	755	1000	245
2003	647	n/a	-
2004	639	n/a	-
2005	523	n/a	-
2006	271	n/a	-
2007	261	n/a	-
2008	328	3000	2672
2009	245	3000	2755
2010	513	1000	487
2011	516	5000	4484
2012**	421	2000	1579
2013**	285	not yet available	-

Sources: Annual Characteristics of SNAP (Food Stamp) Households Report, 2000-2012, table A-25
 Information above for Army, Air Force and Navy is reported by the Defense Finance and Accounting Service (DFAS).
 Marine Corps and Coast Guard data is reported by the Service.
 * In FY2010, the maximum allowance increased from \$500 to \$1100/month.
 **In 2012, DFAS reports transitioned from Fiscal Year (FY) to Calendar Year (CY).
 n/a= this was not reported on these years

The recent and staggering report that a substantial number of households with a member in active duty military service turn to food banks or food pantries for help only magnifies the severe failure of both the FSSA and SNAP programs in addressing the need that persists among some military families. To continue to ignore these failures or pretend that the problem does not exist or isn't "significant" is an insult to the values of our country. It also weakens our military and fails the proclaimed commitment of our armed services to "take care of our own."

First and foremost, MAZON recommends a fundamental reframing of the FSSA program. Rather than aiming to end participation in SNAP by military families, the clear goal of the FSSA program should be to eliminate food insecurity among active duty, reserve, and National Guard households.

To accomplish that goal, we urge you to implement the following FSSA reforms immediately:

I. FSSA must be converted from its current individual application-based delivery system to automatic enrollment.

While a substantial majority of enlisted personnel will not qualify for nor use FSSA benefits, those who do require support should receive those benefits in a streamlined and efficient manner. The current application process requires those in need to go through their chain of command. That creates serious barriers to FSSA participation including shame, stigma, and fear of retribution. In addition, many personnel potentially eligible for the FSSA program do not even know it exists. By contrast, successful examples of automatic program notification or enrollment based on income and household size can be found among USDA-administered programs, which can serve as a model for FSSA. The low participation numbers for the FSSA program are a clear indicator of its failure to effectively meet the level of need that exists.

II. The Department must adopt new FSSA qualification standards that are appropriate for the scope of need and consistent with those for many other federal assistance programs.

To better meet the needs of all military households that encounter food insecurity and to take into account the unique lifestyle challenges for military families, MAZON recommends providing FSSA benefits to households with incomes at or under 185% of the Federal Poverty Level. This eligibility threshold is consistent with many other federal assistance programs, including the WIC program that is currently utilized by many military families.

III. As FSSA eligibility is adjusted to serve every military household at risk of food insecurity, the Department should also restructure the benefit approach and amounts.

Rather than employing an income supplement aimed at bringing the household income above 130% of the Federal Poverty Level, MAZON recommends targeting FSSA benefits for only food purchases, as SNAP does. SNAP also delivers support in the form of an EBT card, an efficiency we recommend. To maximize the objective of FSSA in enabling the purchase of nutritious foods to support good fitness and health, MAZON recommends that the FSSA benefit level be correlated to the USDA's Moderate-Cost Food Plan (by law the Department sets the amount of the Basic Allowance for Subsistence benefit between the Moderate and Liberal Food Plan rates determined by the USDA).

IV. The Department should eliminate the use of housing allowances as a factor in determining eligibility for FSSA benefits.

Counting this allowance as "income" treats our troops differently than the civilian population, for whom the value of housing assistance subsidies and benefits are not

counted as income in the determination of eligibility for SNAP. In addition, this policy establishes an unnecessary barrier to adequate nutritional support, as is validated by the personal stories collected by MAZON that are enclosed with this letter and by the fact that significant numbers of military families turn to food pantries for assistance when they fall through the cracks of safety net programs.

These reforms will not only ensure a military force that is fully fit and able to serve, they will also provide the framework with which the Department of Defense can accurately and regularly monitor the need for FSSA within the ranks. Having accurate and timely information about nutritional challenges in our armed forces will enable the Department's leadership to properly measure, identify and eradicate the problem with maximum efficiency. MAZON urges an immediate change in policy to require states to share with the Department of Defense data about SNAP eligibility and participation and food insecurity as a necessary component to understanding and addressing this issue.

MAZON is confident that you agree that no member of the armed forces should ever have to worry about the sustenance necessary to do his or her job or feed their families. Frankly, this is the most basic responsibility any military organization must meet. It is time to address and eliminate the problem once and for all.

Abby J. Leibman, President and CEO
MAZON: A Jewish Response to Hunger

Abby J. Leibman is the President & CEO of MAZON: A Jewish Response to Hunger, a national nonprofit organization working to end hunger among people of all faiths and backgrounds.

As a leading advocate for women's rights and social justice, Ms. Leibman has worked with and led some of California's most prominent nonprofit organizations, including the California Women's Law Center, which she co-founded and directed for 12 years. Prior to founding the California Women's Law Center, Ms. Leibman was the Directing Attorney/Community Programs for Public Counsel, where she developed and then directed its Child Care Law Project and managed its project providing pro bono transactional assistance to nonprofit organizations. She also has a distinguished record of community leadership including: the Board of Directors for Jewish Family Service of Los Angeles, the Board of California Women Lawyers, the Court and Community Outreach Task Force of the California Judicial Council, Women Lawyers' Association of Los Angeles and as President of the California Children's Council. She served as chair of the West Hollywood Human Services Commission, a member of the Los Angeles Mayor's Advisory Committee on Child Care, a member of the Women's Advisory Council to the Los Angeles Police Commission. Ms. Leibman has taught courses on advocacy, justice and civil rights as adjunct faculty at UCLA and American Jewish University. She has a J.D. from Hastings College of Law and graduated magna cum laude from UC San Diego with a B.A. in Political Science