

The White House
1600 Pennsylvania Avenue, N.W.
Washington, DC 20500

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Submitted via email to WHHungerHealth@hhs.gov

To the Biden-Harris Administration:

On behalf of the millions of service members, veterans, and families the undersigned organizations serve, we write to share our feedback to the questions posed in the White House Conference on Hunger, Nutrition, and Health: Toolkit for Partner-Led Convenings.

Winning the fight against hunger will require support at all levels of the public and private sectors. The organizations contributing to this letter participate in either the Military Family Advisory Network's (MFAN) [Military Family Food Insecurity Coalition](#) or [Combat Military Hunger Task Force](#) and consist of industry-leading companies, subject matter experts, food relief groups, military family advocates, and nonprofit organizations – all with a vested interest in combatting military hunger and identifying long-term solutions for military and veteran food insecurity.

We respectfully request that you consider the following when outlining the strategy to end hunger in America at the conference later this year:

1. Remove Basic Allowance for Housing (BAH) rates in calculations for SNAP or other food-related benefits. We are not looking to reinvent the wheel. When there are existing services and programs in place to provide support to military families, it is the intention of the coalition to drive awareness and access to those programs. The Supplemental Nutrition Assistance Program (SNAP) is one such resource that already exists to help low-income families provide food for their families. However, military families who are food insecure are often ineligible for SNAP benefits because their BAH is counted as income rather than the military subsidized housing allowance that it is. Compounding the confusion, as reported by the Government Accountability Office, the Department of Defense did not collect accurate data to evaluate the actual housing costs in many locations.

For a military family worried about putting food on the table to be told they “make too much money” to qualify for assistance is a problem that needs to be addressed in the fight against military family food insecurity. By removing BAH from calculations made to determine food-related benefits like SNAP, military families will have access to the same relief as their civilian counterparts.

2. Better compensate military personnel and boost economic security. Military pay and benefits have not kept pace with civilian counterparts. At the time of this letter, Congress' efforts have included a proposed minimum 4.6% raise for uniformed and civilian personnel, rising to 7% for most active duty personnel; attempts to expand the basic needs allowance in

both the HASC and SASC versions of the FY23 National Defense Authorization Act (NDAA); an additional \$600M in the HASC defense bill to bolster pay; and targeted pay and inflation bonuses.

But more needs to be done. Military families should not find themselves struggling to put food on the table or a roof over their heads. The pandemic and its aftermath have exacerbated deeply rooted challenges that families have faced for years. The inflation rate is close to 8%. We know that too many families are unable to make ends meet, creating second- and third-order effects on force readiness and the ability to maintain an all-volunteer force.

Similarly, we must address the economic security of military families – which includes looking at how BAH is calculated, supporting military spouse employment, and expanding childcare services for military families.

3. Strengthen child nutrition programs. Many organizations around the country, including those signed-on to this letter, have gone to great lengths to ensure that the closures and/or reduced hours of schools across the country due to the COVID-19 pandemic have not taken away access to meals for military children. But pandemic or not, access to child nutrition resources and supplemental meals — made possible by programs like the National School Lunch Program, Summer Feeding Programs, and the Special Supplemental Program for Women, Infants, and Children (WIC) — provide vitally important food support to military families.

We recommend that the administration prioritize the Child Nutrition Reauthorization, which has not been revised since the Healthy, Hunger-Free Kids Act of 2010. The landscape for child nutrition programs, both in terms of policy recommendations and access to services, is not the same as it was in 2010 and military children – all children – deserve child nutrition programs that reflect what we now know about their needs, particularly in these unusual times.

In some locations, there are satellite WIC offices on base and commissaries that are authorized as WIC- approved vendors. In these places, families are not only receiving assistance close to home, but they are also benefiting from engagement with community partners, which can reduce loneliness. We recommend that child nutrition programs be co-located on military installations. Co-locating services on base brings access to these resources and community connection to the families that need them. Furthermore, it communicates the message that the military encourages and supports their use.

4. Appoint a singular point of contact with responsibility for food insecurity at DoD. The USDA has a designated position for a Military & Veterans Affairs Liaison. We recommend that a similar role be created at the Department of Defense. Having a single point of contact with ownership of the issue of military family food insecurity at DoD would chart a clear path and area of responsibility within the Pentagon to track and manage this issue from both a programmatic and solution-oriented perspective.

5. Clearly study the breadth of food insecurity beyond who is using SNAP. Many times in the past, and most recently in iterations of the National Defense Authorization Act (NDAA), there have been calls by Congress for more data from DoD regarding food insecurity among the military ranks. We look forward to seeing that information made publicly available soon.

In the Thirteenth Quadrennial Review of Military Compensation (QRMC), SNAP usage among military families was addressed. But, as mentioned previously, barriers to military families accessing SNAP mean that SNAP data alone paints an incomplete picture of the full scope of the problem of military family food insecurity. Future research efforts to quantify this issue need to look more broadly, beginning with an accurate calculation of the number of military families who are actually experiencing food insecurity. It would be our honor to support and advise on the discussions that drive that research.

6. Eliminate the stigma of accessing food assistance. Stigma can easily get in the way of accessing necessary assistance, whether a family is military or civilian. But there are additional challenges to asking for help as a military family. Military families are frequently encouraged to maintain resiliency and make use of existing resources when needed. But we've heard from many of those same families who say they are worried that should their inability to feed their family — their “financial fitness” — be called into question, there might be the risk of lost security clearances and the possibility of jeopardizing a military career.

If the needle is ever to move on military family food insecurity, accessing food support programs should be no different than using any other resource a military family might need. Whether using on-installation food resources or local community providers, military families should continue to be encouraged to seek and receive the assistance they need to make their families whole. Our groups have familiarity with military culture, experience delivering food-related services and programs, and a desire to serve the military community.

7. Leverage existing resources like the Defense Commissary Agency (DeCA or “the commissary”). One of the primary objectives of the commissary is to provide a benefit to service members through savings on groceries. Unfortunately, according to a recent Government Accountability Office report, there is an inherent conflict between being a business that must mark up prices to generate a profit and providing a savings to military families. Stopping the requirement of commissaries to generate a profit would allow the commissary to provide some relief for military families from rising food prices and truly offer a benefit to military families. Additionally, commissaries have a mandated 5% surcharge that is primarily used for renovation and construction of stores. This surcharge should be eliminated. If the commissary is intended to be a benefit for military families, then the funds should be appropriated to support that benefit, not passed on to the military families who are already struggling.

The commissary also offers an opportunity to support military families directly in their communities. The commissary has the potential to offer programs similar to retail grocery chains (e.g., a round up program where the funds are used to support those military families in

need or rewards programs that offer savings on gas). Similarly, expanding the Feds Feed Families (FFF) campaign to be a year-round program, where patrons can purchase pre-boxed products that are given to military service organizations and chaplains to distribute to those in need. The commissary is currently piloting grocery delivery at select installations. Expanding that service to have donated product delivered directly to the homes of those who are struggling, free of charge, is an excellent example of how we could work together to tackle this issue.

8. Promote education on nutrition and budgeting. When it comes to combatting food insecurity, education about the basics of daily nutrition and budgeting are crucial. Military families live busy lives and sometimes need help understanding how to put real food on the table for their families, how to shop for it, how to save money, and what resources are available at the local and national level to assist when they need help. While there are nonprofits offering these kinds of services, a family must seek those out. We can do better by ensuring the DoD is working across departments to provide this support consistently at all bases.

Respectfully,

American Logistics Association
Armed Services YMCA of the USA
Food Lifeline
InDependent
MAZON: A Jewish Response to Hunger
Military Family Advisory Network
Military Resale Small Business Coalition
National Military Family Association
SpartanNash
Tyson Foods
UNC Lineberger Comprehensive Cancer Center