
MEMORANDUM

April 21, 2020

To: Governors' Offices
From: Bill McBride, Executive Director
Re: Steps to Address Food and Financial Insecurity for Individuals and Families in Response to the COVID-19 Pandemic

Summary

This memo looks at what system level changes governors are making to address food and financial insecurity, including support for affected workers, as a result of COVID-19. This memo is part of an NGA checklist that provides considerations for governors in preparing for, responding to, and recovering from, the spread of the virus. It is not intended to be an exhaustive list, but rather to highlight key steps that states may consider to protect public health and address other consequences, and offer resources to support state actions. Readers are also encouraged to review NGA resources on [unemployment insurance during COVID-19](#) and relevant [Coronavirus Aid, Relief, and Economic Security Act \(CARES Act, P.L. 116-136\) provisions summaries](#).

The Importance of Addressing Food and Financial Insecurity

In the short-term, workers may be unable to go to work either due to being exposed to coronavirus, sick and quarantined, or having their workplaces closed or operating with reduced staff per state, local, and/or federal guidance. Children of all ages are being sent home from childcare and schools in many states, leaving them without access to nutrition programs. Further, many students at postsecondary institutions are dependent upon their school for access to food; temporary campus closures across the country may make it difficult or impossible for students to access these benefits.

It is also expected that unemployment rates will be significantly higher over the long-term as the economy enters recession. As governors consider immediate action in support of workers impacted by COVID-19, they should also consider what groundwork they can lay in terms of resources and regulations to ensure that an increasing number of unemployed individuals receive the necessary relief. This memo considers steps governors can take to alleviate food and financial insecurity as a result of COVID-19.

Addressing Food Insecurity

1. **Expand Access to Youth Nutrition Programs:** The USDA has [issued](#) guidance granting flexibility across several nutrition programs to support schools and communities in providing meals to children in areas experiencing school closures in response to COVID-19. The Families First Act includes a general provision that allows the Department of Agriculture to approve state plans to provide emergency Supplemental Nutrition Assistance Program (SNAP) assistance to households with children who would otherwise receive free or reduced-price meals from their school. In order to be eligible, the child's school must be closed for no less than 5 consecutive days. In addition, states may wish to seek additional flexibility to:

- Allow non-congregate feeding during emergency school closure to reduce exposure of children and families to COVID-19. [Washington](#) received approval of this waiver from USDA FNS;
 - Eliminate the area eligibility requirement for Summer Food Service Program (SFSP) and Seamless Summer Option (SSO) for emergency school closures. This waiver would allow schools in areas not designated as high need to offer meals to students under the Emergency School Closure provision of the SFSP/SSO programs.
 - Request approval to substitute certain WIC food package items with similar items when WIC approved foods are unavailable.
 - See all [approved child nutrition program waivers here](#).
 - See an [FAQ on State and District Response to COVID-19 Outbreak](#) as it relates to continued distribution of food for students who qualify for Free and Reduced Lunch.
2. **Increase Access to and Use of SNAP Benefits:** To minimize economic and social disruption and bolster program countercyclical impacts, consider increasing access to and use of SNAP benefits. As a note, low income seniors participate in SNAP at approximately 50 percent the rate of other populations. States should consider how to ensure that low-income older adults receive targeted attention during this pandemic, including clear information about eligibility, medical deductions, and easy access to phone or video-based one-on-one assistance in the application and renewal process.
- Governors may consider requesting from USDA a waiver on the restriction on use of SNAP for hot meals in restaurants in order to supplement the local economy and address potential foodstuffs shortages.
 - **Louisiana** Governor Edwards sent a [letter](#) to President Trump requesting this waiver.
 - Governors can additionally take actions to:
 - Reduce the state-required paperwork needed to prove eligibility;
 - Increase the length of time in which recipients would not have to resubmit evidence of eligibility;
 - Redetermine eligibility associated with asset limits (which are state, rather than federally determined);
 - Use the categorical eligibility option to offer households with *gross* incomes above 130 percent of the poverty line (up to 200 percent of poverty in a few states), but *disposable* income below the poverty line, access to SNAP. This option favors low-income households with modest incomes and high living expenses to qualify for SNAP after demonstrated need, as well as those who may not traditionally qualify due to savings up to \$3,251;
 - In addition to the mandated exemptions from the SNAP time limit, states have additional flexibility to set their own exemption criteria and exempt up to 15% of their caseload from the time limit. States should consider taking advantage of this full exemption, and target application of these exemptions to high-risk populations;
 - Assess all state-administered benefit programs to determine which programs require an in-person interview for eligibility (re)certification and consider waiving all applicable state requirements for those at highest risk.

- Conduct media campaigns to recruit eligible households.
3. **Work with Postsecondary Institutions to Ensure Students can Still Access Food During Closures:** Nearly 40 percent of postsecondary students polled in a [recent study by the Hope Center](#) indicated they were food insecure in the previous month. These students are often dependent on institution-led programs that provide them with access to food. As institutions close or move to online learning, these students may no longer have access to these programs. As such, governors have an opportunity to work with institutions to ensure students are able to access food during this closure period. Below are some examples of ways governors can respond to this crisis:
- Governors can provide guidance to institutions as they work to plan for student hardships.
 - In **New Jersey**, the Office of the Secretary of Higher Education released a [Guide for New Jersey Institutions of Higher Education](#) on March 11, 2020, which provided a section that urges institution to consider the material hardships of students that may result from institution closures. They recommend that institutions discuss alternative plans and appropriate accommodations for students for whom campus is their primary residence.
 - **Colorado** also provided a [Planning for Institutions of Higher Education](#) document that instructs institutions to develop and/or review their emergency operations plans, and consider including guidance related to students who depend on housing and food services.
 - Governors may request a waiver to remove student eligibility criteria for SNAP.
 - **Pennsylvania** Governor Wolf requested a [waiver](#) to waive the requirement that students who are enrolled in a higher education institution at least half-time also work 20 hours per week. The Wolf Administration also requested to waive requirements that students who do not meet eligibility restrictions are not included in their household's SNAP eligibility. This would ensure that low-income households have access to additional SNAP benefits if a student enrolled in a higher education institution is unexpectedly home due to coronavirus closures.
 - See all approved [state COVID-19 SNAP waivers here](#).
 - Work with local food banks to ensure food access for students.
 - Share with students, faculty, and staff where they can access food. The impacts of COVID-19 may increase the amount of people who need access to these resources. Include information about basic needs prominently on COVID-19 resource pages.
 - On March 15, 2020, UC Riverside provided an [update](#) to students that communicated information about housing and meal plans. UC Riverside provided gift cards to grocery stores.
 - Monitor and notify institutions of changes in SNAP eligibility that may increase accessibility of benefits for college students, and support students in applying for SNAP.
 - Other helpful resources:
 - Supporting Students During COVID-19: <https://hope4college.com/supporting-students-during-covid19/>



- Webinar – Meeting Students Basic Needs and Keeping them
Enrolled: <https://hope4college.com/2865-2/>

Addressing Financial Insecurity

- 1. Increase Access to Unemployment Compensation:** The U.S. Department of Labor (DOL) has [provided guidance](#) around flexibility for providing unemployment compensation for individuals affected by COVID-19 through the existing Unemployment Insurance (UI) system. [Unemployment Insurance Program Letter No. 10-20 – “Unemployment Compensation (UC) for Individuals Affected Coronavirus Disease COVID-19”]. This guidance encourages governors to:
 - Consider allowing flexibility for eligibility for state unemployment insurance (UI) funds for individuals who have to quarantine, even if their place of employment is not closed.
 - See [Washington’s](#) provisions to provide flexibility and greater approval authority to their state agency that administers the UI program
 - See [Montana’s](#) proposed amendment to state UI law on benefit eligibility.
 - The CARES Act establishes emergency sources of unemployment assistance and expands access to the self-employed, including on-demand or “gig” workers, as well as adding additional benefits and additional time. Governors should consider opting into the optional components of the unemployment assistance provisions in the CARES Act.
 - For more information on the unemployment assistance provisions in the CARES Act and related steps governors can take to expand access to and capacity for administering UI, please refer to this NGA [memo](#).
 - Consider expanding state eligibility for the self-employed, including on-demand or “gig” workers, who ordinarily may not qualify or have access to other benefits. This is an option particularly in states that have established a [Self-Employment Assistance \(SEA\)](#) program with US DOL, including establishing eligibility via state law. This is a voluntary program that is active in DE, MI, NH, NY, and OR through which states can pay a SEA allowance, instead of regular UI benefits, to help unemployed workers while they are establishing businesses and becoming self-employed. Participants receive weekly allowances while they are getting their businesses off the ground.
 - See [New Hampshire’s](#) provisions to provide UC eligibility to the self-employed whose work is impacted by COVID-19.
 - States that do not have an active SEA program can establish a program via legislation. See examples of [model legislation](#) from four states.
 - Consider encouraging the use of “[short-time compensation](#)” (STC) or work sharing programs. STC can be an alternative to layoffs for employers experiencing a reduction in available work. Eligible employers may apply for STC programs. Those employees experiencing a reduction in hours are allowed to collect a percentage of their unemployment compensation (UC) benefits to replace a portion of their lost wages. STC programs are administered by state UI agencies. 27 states had STC programs established in law that met federal standards with 26 having operational programs ([Arizona](#), [Arkansas](#), [California](#), [Colorado](#), [Connecticut](#), [Florida](#), [Iowa](#), [Kansas](#), [Maine](#), [Maryland](#), [Massachusetts](#), [Michigan](#), [Minnesota](#), [Missouri](#), [Nebraska](#), [New Hampshire](#), [New Jersey](#), [New York](#), [Ohio](#), [Oregon](#), [Pennsylvania](#), [Rhode Island](#), [Texas](#), Vermont, [Washington](#), and [Wisconsin](#)).



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- Under The [Coronavirus Aid, Relief, and Economic Security \(CARES\) Act](#), the 27 states that have STC compensation programs can now have these programs' benefits to workers 100% federally financed for up to 26 weeks, creating a further incentive for them to promote STC to businesses. Employees that are covered under an STC program will receive, in addition to their partial unemployment, the additional [Federal Pandemic Unemployment Compensation \(FPUC\)](#) \$600 weekly payment. For states without existing programs, the federal government will temporarily finance 50% of the program. The federal government will also provide up to \$100 million in grants to states to implement, improve, and promote STC programs.
 - Consider lessening the time it takes to process a determination on UI claims (typically 5-7 business days).
 - See examples from [Rhode Island](#) and [California](#).
- 2. Increase Awareness of UI Eligibility and Scope:** The CARES Act [expanded access to emergency unemployment benefits](#). It temporarily supplements UI benefit amounts, extends the duration of the benefits, and provides access to workers typically left out of regular UI benefits. Governors can raise awareness in their states on who is eligible for the emergency unemployment benefits and what these expanded benefits are.
- 3. Ensure Access to Temporary Assistance to Needy Families (TANF) Benefits:** The CARES Act offers a clean extension of the TANF block grant through November 30, 2020 and the Administration for Children and Families recently issued an [FAQ document](#) on state flexibilities in TANF administration. Under federal rules, states have broad flexibility to administer the TANF Program, which could provide critical financial assistance to families impacted by COVID-19 due to job loss or a reduction in work hours. Under federal TANF rules, states may set the criteria for “needy,” and can set different income levels for different services. For example, a state may use TANF to support families in which parents are unable to work due to contracting COVID-19, exposure to someone with the disease, because their children’s school or child care provider has closed, or because their own work place has closed.

An immediate coordination that states can take is to ensure that families with low-incomes who are impacted by COVID-19 know how to access safety net programs. Additional actions that many states are seeking include:

- a. Consider extending emergency cash assistance.** During emergencies, states may extend non-recurrent, short term benefits (NRSTs) that (1) respond to a specific crisis, (2) are not intended to meet recurrent needs, and (3) do not extend beyond four months. NRSTs are more flexible than traditional TANF benefits: states may set higher income standards, and they do not trigger typical work requirements and data reporting requirements associated with TANF.
 - [Tennessee](#) extended up to up to two months of emergency cash assistance to families if they were employed as of March 11, 2020 and they lost employment or at least 50% of their earned income as a result of the pandemic. Applicants’ income must not currently exceed 85 percent of the state’s median income in order to be eligible.
- b. Consider relaxing work requirements.** States have the flexibility to grant exemptions to work and job-search requirements for participants who cannot go to work or training activities due to their own illness, the closure of their child’s school or day care, or the closure of their work or training site.



- [Indiana](#) waived job search requirements for TANF applicants.
 - [Florida](#) waived work requirements for TANF recipients.
- c. **Consider streamlining application processes.** States may streamline application processes to expedite eligibility and payment determinations and offering online or telephonic applications to minimize face-to-face contact.
 - d. **Consider extending maximum benefit allotments.** States may increase cash benefit levels for TANF recipients whose income is reduced due to the coronavirus.
 - [Tennessee](#) increased TANF allowances, permitting a family of five that has experienced a job loss assistance of up to \$1,000. The Tennessee Department of Labor is also working with the use of the Unemployment Insurance Trust Fund to allow those who are quarantined or lost their jobs to receive unemployment benefits.
- 4. Increase Access to Paid Sick Leave:** Governors can also consider steps to expand access to paid sick leave through federal, state, and employer resources.
- The Families First Coronavirus Relief Act’s Emergency Paid Sick Leave , as amended by the CARES Act, [provides](#) roughly two weeks of job protected paid sick leave for full-time employees and provides coverage based on average weekly hours worked for part-time employees. It also provides for full wage replacement for self-care, and 2/3 wage replacement for people who have to take time off of work to care for someone else or because they are unable to access childcare due to mandated closures.
 - See [Colorado’s](#) Emergency Rules that require up to four days of paid sick leave for employees being tested for COVID-19 in select industries which include: leisure and hospitality; food services; child care; education, including transportation, food service, and related work at educational establishments; home health, if working with elderly, disabled, ill, or otherwise high-risk individuals and; nursing homes and community living facilities.
 - See [New York's](#) announcement that the state will provide two weeks two full weeks of paid leave for all state workers who are subject to a mandatory or precautionary order of quarantine as a result of the novel coronavirus.
- 5. Improve Housing Stability:** People who are out of work or underemployed due to COVID-19 may experience several challenges in making rent, mortgage or public utility payments. Moreover, people experiencing homelessness are at increased risk of contracting the coronavirus and may have additional health complications that increase their risk of mortality. The CARES Act provided additional funding to the Department of Housing and Urban Development (HUD) in order to keep more Americans stably housed through this crisis. These include \$5 billion for the flexible Community Development Block Grant (CDBG) program, \$4 billion in homeless assistance grants, and additional funding for housing vouchers, public housing, and HUD’s Section 202 housing program for the elderly. There are several actions that governors can consider to support housing stability in their states. These include:
- a. **Consider halting evictions and foreclosures.** In order to slow foreclosures and mitigate homelessness, consider issuing guidance to prevent evictions and maintain utility operation for those who are unable to pay.
 - [Indiana](#) Governor Holcomb issued an [Executive Order](#) temporarily prohibiting evictions and foreclosures.

- The **District of Columbia** is proposing the prohibition of eviction during the state of emergency and that no utility to be turned off due to non-payment during the state of emergency. Information [here](#).
- **Consider expanding emergency rental assistance programs.** Renters who are protected from eviction for a certain time period may be unable to pay their rent and back rent at the closure of eviction protection. Landlords would also be protected from foreclosure through emergency rental assistance.
 - **Colorado** Governor Polis' Executive Order limiting evictions, foreclosures and public utility disconnections also provided \$3 million in emergency rental assistance.
- **Work with the state's Housing Authority and local HUD field offices to secure additional HUD funding.** CARES Act funding may support activities including:
 - Serving people experiencing homelessness through increased shelter capacity, reconfigured shelter space to adhere to physical distancing guidelines, and deliver medical care to people experiencing homelessness;
 - Implementing emergency rental and utility assistance and emergency homeowner assistance programs;
 - Support additional costs faced by affordable housing providers, including providing for cleaning costs and recouping the cost of missed rental payments; and
 - Support special populations, including veterans, youth, seniors, and people with disabilities.
- Additional resource: [COVID-19 and Homelessness: Strategies for Schools, Early Learning Programs, and Higher Education Institutions](#)

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