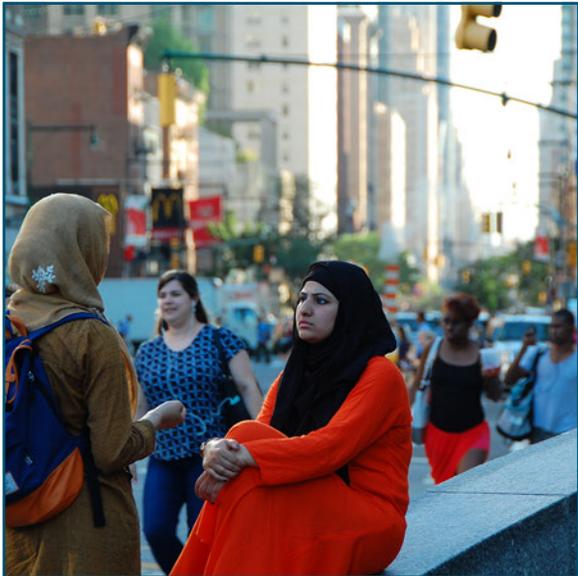


Expanding Immigrant Access to Food Benefits in New York City

Defining Roles for City and State Government

JUNE 2018



EXECUTIVE SUMMARY

For more than 50 years, the Supplemental Nutrition Assistance Program (SNAP), previously known as Food Stamps, has helped millions of Americans to avoid hunger, improve their health and alleviate the consequences of poverty. Two other federal programs have for decades provided similar protections for other populations. Women, Infants, and Children (WIC) offers pregnant women, new mothers and their young children vouchers for healthy food, and School Food provides free meals for school children.

From its earliest days, the United States has debated immigration policy, at times restricting access to certain groups of immigrants and at other times welcoming groups from many nations. Beginning with the passage of the Immigration and Nationality Act Amendments of 1965, the main direction of United States immigration policy was until recently to reduce barriers to immigration and to support family unification. Now those goals have been reversed and recent federal policy changes and proposals seek to discourage immigration.

Today, two American traditions, providing food support for the hungry and welcoming those from other nations, are under concerted attack by President Trump, the Republican majority in Congress, and the Supreme Court. Intensified immigration enforcement, threats to withhold green cards or impose charges on those who have used public benefits like SNAP, and the termination of Deferred Action for Childhood Arrivals (DACA) and other temporary protected status programs have created an unprecedented level of fear among immigrant communities. Separate proposals to restrict SNAP through budget cuts and block grants and to impose new work requirements on recipients further jeopardize the safety net program that protect immigrants and other groups from food insecurity and hunger.

In this report, the CUNY Urban Food Policy Institute examines how the intersection of these two trends—restricting immigration and cutting back food assistance—is affecting immigrants in New York City. Our goal is to provide evidence that can inform New York City and State policy initiatives that can protect and restore the basic American values of feeding the hungry and welcoming immigrants. We also hope to join with others around the country in this effort.

We focus on New York City and State for several reasons. First, New York City has more hungry and food insecure people and more immigrants than any other US city. Reversing more inclusive immigration and food assistance policies will have an especially severe impact on our city and state. Second, New York has a tradition of protecting and expanding these values. As the federal government steps back, our city

and state have the opportunity to step forward, demonstrating to the nation and the world that some Americans still seek to uphold our core values. Third, developing new policy initiatives here sets an example for other cities and states to follow and showcases policy options that can be discussed in the 2018 and 2020 national elections. Fourth, we believe that linking these two issues creates the potential for new, more powerful, and compelling local and national alliances that can advance the moral, health, and economic arguments for food assistance and immigrant inclusion.

This report is based on an online survey of 50 staff from nearly 30 immigrant-serving and anti-hunger groups in the New York area, and in-depth interviews with seven key informants working in those organizations. We also reviewed recent news media, peer-reviewed journal articles, and advocacy group reports to describe characteristics of immigrants, practices of organizations that serve them, and city, state, and federal policies that act as facilitators or barriers to immigrant enrollment in public food programs.

We identified factors that facilitate immigrant access to food benefits at the individual, organizational, and policy levels. These include availability of social networks that connect immigrants to community services, adequate language skills and cultural competency of the staff of immigrant serving and anti-hunger organizations, and sanctuary policies. Barriers at the three levels include immigrants' reluctance to provide personal information to service programs, insufficient organizational outreach and education, and exclusionary public statements and policies.

Several of these factors have been described previously—what is new, however, is the level of fear and anxiety reported among immigrant communities. Individuals interviewed for this report confirmed that many immigrants are reluctant to share personal information and participate in food programs, even if they or their family members continue to be eligible.

Considering these facilitators and barriers, we recommend four strategies for protecting and expanding access to public food benefits for immigrants in New York City. Reliance on food assistance has causes deeply rooted in our society: low wages, lack of employment and other benefits, the high cost of health care and inadequate affordable housing. Many low-income New Yorkers face these challenges, which will increase if the Trump administration succeeds in implementing other aspects of its policy agenda related to taxes, health care, housing, and labor laws. In the long run, taking on these fundamental causes of poverty will benefit both immigrant and native-born New Yorkers. However, the four recommendations below point to steps New York City and State can take now to tackle the more immediate barriers described in this report:

1—Create and expand programs with city and state funding that bring food assistance to immigrants with minimal or no requirement for documenta-

tion. For example, the city and state could supplement federal funding for summer meals for school children to also feed their parents and other family members or add funding to Health Bucks, a program that provides discounts on fruit and vegetables purchases at farmers markets.

2—Develop and expand multi-pronged communications and policy initiatives to reduce stigma against immigrants. To counter stigmatizing messages and policies from federal officials, New York City can promote IDNYC, the identity card available to all New Yorkers; expand sanctuary city protections; and challenge the legality of discriminatory policies. Stigma that isolates immigrants reduces their access to many public benefits, including food.

3—Strengthen the linguistic, cultural, and organizational capacity of community organizations and social service agencies that serve immigrants. To ensure that immigrants can find the help they need to avoid food insecurity, New York City should assist organizations to include the translation, cultural, and other services that enable immigrants to feel safe and get the help they need.

4—Improve outreach, enrollment, and education initiatives of community and public agencies that serve immigrants to ensure that all immigrants are enrolled in food programs for which they are eligible and that they are fully aware of their rights. By developing the capacity of immigrant-serving organizations to conduct active outreach, design user-friendly enrollment, and connect their clients to other community services, New York City can enhance the impact of existing programs. For example, every organization serving immigrants should be promoting the new universal free lunch program and assisting immigrant parents to monitor implementation so their children's needs are met.

While New York City elected officials, activists, and voters will need to continue to advocate for the basic American traditions of feeding the hungry and welcoming immigrants, it seems likely that in the next few years, powerful national forces will continue to oppose such policies. Thus New York has both the obligation and the opportunity to chart new paths in creating city, state and community programs that reaffirm these values.

Acknowledgements

Many individuals and organizations contributed to this report. We thank the 50 individuals from 30 organizations who responded to our survey and the seven leaders of food security and immigrant serving organizations who agreed to be interviewed. Institute staff members who contributed to this report include Nevin Cohen, Anabel Perez-Jimenez, Jan Poppendieck, and Craig Willingham. We thank the Sociological Initiatives Foundation and New York Community Trust for their support for this project. This report reflects the interpretations and opinions of its authors not our funders, employers, or informants.

Suggested Citation

Vignola E, Ruiz-Navarro P, Freudenberg N. Expanding Immigrant Access to Food Benefits in New York City: Defining Roles for City and State Government. CUNY Urban Food Policy Institute, 2018.

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INTRODUCTION

In the last century, the United States has created several public programs that helped the country move from being a nation where hunger and food insecurity were seen as inevitable consequences of poverty, even justified punishment for lack of hard work, to one where preventing hunger was a worthy and attainable goal.

In 2015, the Supplemental Nutrition Assistance Program (SNAP, formerly known as Food Stamps), the largest of those programs, provided benefits to more than 44 million low-income U.S. residents at a cost of about \$70 billion for fiscal year 2015.¹ The Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) offers healthy food to about 7 million women and their young children at a cost of \$5.6 billion.² School Food serves lunches to about 30.5 million school children and breakfasts to about 14 million at a total cost of around \$17 billion.³ In New York City, SNAP provides food benefits to 1.7 million New Yorkers, about 20 percent of the population on average each month.⁴ WIC serves more than 200,000 women and young children in New York City, and School Food offers free lunches and breakfasts to the 1.1 million children enrolled in the city's schools.

These food safety net programs, however imperfect in their scope or implementation, have been demonstrated to contribute to outcomes that benefit individual participants and society as a whole. SNAP, for example, reduces food insecurity and hunger, mitigates the consequences of poverty, improves health, and strengthens local economies.⁴ WIC has been shown to contribute to healthier infants, more nutritious diets and better health care for children, and subsequently to higher academic achievement for students.⁵ School food programs reduce food insecurity, improve dietary intake, can reduce obesity rates, and, by meeting children's nutritional needs, contribute to improved school attendance and learning.⁶⁻⁸ With benefits like these, one would think policy makers would be looking to expand and strengthen SNAP, WIC, and school food programs. Instead, these programs face harsh criticism.

Even before the new attacks on food benefits, many food-insecure residents of our city and state lacked access to these food safety net programs. Many are unaware of their eligibility or face obstacles in enrolling. One such group, the focus of this report, is immigrants, defined broadly as people born elsewhere who come to the United States to work, live, or spend extended time. While immigrant access to food benefits has long been the subject of national debate, the election of Donald Trump and a Republican Congress in 2016 has raised a new level of concern. Proposed regulations leaked in February 2018 would add SNAP, WIC, and other forms of government assistance to the list of safety net programs that potentially disqualify an immigrant from becoming a green card holder in the future.^{9,10} This is just one recent example of the wave of

anti-immigrant sentiment that adds new barriers to public benefits for immigrants. Media reports suggest that many immigrants in New York City and around the nation are withdrawing from SNAP, even if some family members continue to be eligible under existing rules.¹¹⁻¹⁴ Others are reluctant even to ask questions about food benefits, fearful that this will put them at risk of deportation or other sanctions. Even though all immigrant students are eligible for school food programs, some seem to fear that its documentation requirements put them at risk of scrutiny by immigration authorities. In addition to the increased stigmatization and harassment of immigrants, threats to restrict SNAP through budget cuts and use a block grant make the issue of food insecurity among immigrants more pressing than before.

This report describes the current eligibility of immigrants for the major national food programs (SNAP, WIC, and School Food) in New York City. It provides answers to the following questions:

1—What policies determine the eligibility of various groups of immigrants for the three major public food programs: SNAP; WIC, and School Food?

2—In what ways have these policies changed—or been perceived to change—since the November 2016 election of Donald Trump and a Republican-controlled Congress?

3—How do the beliefs of immigrants, the practices of organizations that serve them, and the policies of city, state, and federal government related to food benefits for immigrants act as facilitators or barriers to immigrant enrollment in public food programs?

4—What steps can New York City and State take to improve immigrant access to food and reduce the threat of increasing rates of food insecurity and hunger among the city's immigrant populations?

The goal of the report is to encourage a future-oriented local and national conversation on how to prevent increases in hunger and food insecurity among immigrants. More specifically, the CUNY Urban Food Policy Institute and its anti-hunger and immigrant-serving organizational partners hope to encourage city and state policy makers to consider how our region can lead the nation in forging humane, effective, and practical ways to ensure that immigrants and other New Yorkers have access to the food they need to maintain health and function as full members of our society.

In the current political climate, asserting that immigrants have the right to food and to avoid hunger seems like a radical idea. But, as Rebecca Solnit points out in *Hope in the Dark: Untold Histories, Wild Possibilities*, every social advance is first regarded

as naïve or impossible. Who would have imagined in the 1840s that the United States would abolish legal slavery? What mainstream leaders before the end of the 19th century would have accepted that by 1920 women would have the right to vote? Even a decade ago, what political leaders would have predicted that by 2015, the Supreme Court would rule that state-level bans on same-sex marriage were unconstitutional? And finally, more prosaically, who would have predicted five years ago that in 2017, the Mayor, the City Council, and the New York City School Chancellor would agree to make school lunches free for all New York City school children, an idea that had been advanced for more than 20 years?

This report is based on the idealistic premise that all people have the right to the food they need to sustain health. Our aim is to consider the practical steps we can take in New York, starting with the immigrant populations whose access to sufficient food is now in jeopardy. How can we, over time, turn this visionary hope into the mainstream reality that has also seen the end of slavery, women’s vote, gay marriage, and free school lunches?

This report summarizes information collected through an online survey completed by 50 staff from nearly 30 immigrant-serving and anti-hunger groups in the New York area, and in-depth interviews with seven key informants working in those organizations. The survey, conducted in late 2016, asked about barriers and facilitators at three different levels—immigrant beliefs, organizational practices, and policies—for SNAP, WIC, and School Food. The interviews, conducted between June and August 2017, included follow-up questions about informants’ perceptions of facilitators and barriers related to organizational practices, as well as their perception of changes in their immigrant clients’ concerns and willingness to enroll in food programs since the 2016 election. We supplement these two sources with information from news media, peer-reviewed journal articles, and reports written by advocacy groups.

Immigrants in New York City

About 3.2 million immigrants live in New York City, making up 38 percent of the population and 46 percent of its resident labor force.¹⁵ Since 2000, the immigrant population has increased by 12 percent. Many of these immigrants live in “mixed-status” households: almost one third of US-born children under the age of 18 living in New York have at least one parent who is foreign-born. It is estimated that about 575,000 of New York City immigrants lack documentation.¹⁶ Those from the Dominican Republic, China, Jamaica, Mexico, Guyana, and Ecuador, the largest immigrant populations in New York City, comprise approximately 43 percent of the city’s total foreign-born immigrant population. Rates of poverty, a reliable predictor of food insecurity, vary considerably by country of origin: 32 percent of Dominicans, 24 percent of Mexicans, and 22 percent of Chinese immigrants have household incomes below the poverty line, compared to 11 percent of Indian immigrants and 10 percent of Guyanese immigrants.¹⁵

State and city-level data on food insecurity among immigrants are limited, but a 2002 report by the Urban Institute found that 31 percent of immigrants in New York City were food insecure, nearly three times the rate among native-born New Yorkers.¹⁷ More recent data on food insecurity among immigrants in New York City is lacking. However, a 2017 report by Robin Hood estimated that 39 percent of SNAP-eligible immigrants in New York City were not enrolled in SNAP, compared to 26 percent of US-born individuals, suggesting a gap that more aggressive outreach and education could close.¹⁸ Food insecurity is likely to be highest among immigrant groups with the highest poverty rates (Dominican, Mexican, and Chinese immigrants), especially in households with children.

Immigrant Eligibility for Food Benefit Programs

The three major federal food programs discussed in this report—SNAP, WIC, and School Food—rely on a mix of city, state, and federal funding and rule-making, as shown in Table 1.

Table 1. Agencies Involved in Administration and/or Funding of the Three Major Federal Food Programs

PROGRAM	CITY AGENCIES	STATE AGENCIES	FEDERAL AGENCIES	NONPROFIT ORGANIZATIONS
SNAP	Human Resources Administration	Department of Social Services	USDA	Community-based sponsors
WIC	Department of Health and Mental Hygiene	Departments of Health and Social Services	USDA	Clinics and community-based sponsors
School Food	Department of Education	Department of Education	USDA	Nonprofit private schools and residential child care centers

Eligibility for the three programs is determined by two sets of regulations: those that set the income and “asset” eligibility rules for each program, and those related to immigration status. The rules for each program are shown in Table 2. SNAP is unique among the public food programs for having immigration restrictions, but other types of federal assistance, such as Medicaid, Child Health Insurance Program (CHIP), and Temporary Assistance for Needy Families (TANF), are also restricted for certain groups of immigrants. For immigrants, immigrant-serving organizations, and social service agencies, understanding these sometimes complex rules is both a prerequisite and a barrier to enrollment.

Table 2. Program and Immigration Status Requirements for the Three Major Federal Food Programs

PROGRAM	PROGRAM REQUIREMENTS	IMMIGRATION STATUS REQUIREMENTS
SNAP	<ul style="list-style-type: none"> An adult or household. Applicants must be a resident of the state where they are applying. Applicants must meet in-come eligibility guidelines or receive Medicaid or TANF. 	<ul style="list-style-type: none"> Legal permanent residents (green card holders) are eligible after 5 years of eligible immigration status.* Undocumented immigrants are not eligible, though they may apply for their qualifying US citizen children.
WIC	<ul style="list-style-type: none"> A pregnant woman, an infant or child up to 5 years old; a mother of an infant up to 6 months old or breast-feeding mother with an infant up to 12 months old; a father or caretaker applying for their children. Applicants must be a resident of the state where they are applying. Applicants must meet in-come eligibility guidelines or receive Medicaid, SNAP, or TANF. 	No immigration restrictions
School Food	<ul style="list-style-type: none"> A school-age child in a participating public or nonprofit private school or residential child care center. Applicants must be a resident of the state where they are applying. Applicants must meet income eligibility guidelines or receive SNAP or TANF, unless the school provides free or reduced-price meals to all students under the Community Eligibility Provision or Provision 2. 	No immigration restrictions

* Legal permanent residents with less than 40 qualifying quarters of work are eligible for SNAP after 5 years of eligible immigration status. Legal permanent resident children, refugees and asylees, and certain specific groups of immigrants (including entrants from Cuba, Haiti, those with Iraqi or Afghan special immigration status, and certain Hmong or Highland Laotians) are exempt from the five-year requirement.

While eligibility rules for each program have not changed since President Trump took office, various policy changes and proposals related to immigration enforcement, rules for green card applications, and eligibility for tax credits made by his administration may change immigrant access to food and other public benefits in the coming year. We discuss these changes in the section on policy barriers and in the appendix. Specific information on the health impact and participation rates of eligible immigrants for each program is provided in a previous report published by the CUNY Urban Food Policy Institute.¹⁹

IMMIGRANT KNOWLEDGE, BELIEFS, & VALUES

On the individual and household levels, immigrants' knowledge, beliefs, and values about food benefits, community services, and government agencies influence their access to and use of food benefits. As many immigrants are also low income and people of color, many of their beliefs and attitudes are influenced by their lived experiences at the intersection of these categories. In this section we explore some of the characteristics and values among immigrant individuals and communities that facilitate or deter access to food benefits.

Immigrant-Related Facilitators

—Social networks

Social networks are an important source of information and support for many immigrants. Research shows that large, well-connected immigrant communities can facilitate access to goods, information, and resources.²⁰ Most immigrants, particularly new arrivals, learn about public services through these networks, and are more likely to apply for benefits if they have relatives or friends who participate in programs and have benefited from them. Community leaders we interviewed in Brooklyn and the Bronx noted that word of mouth is often more powerful than formal advertising in transmitting information about food programs to immigrant populations.

—Trust in community organizations

Immigrants who sense that community organizers and program staff are approachable, respectful, and committed to supporting them are more likely to seek services and guidance, including guidance about applying for food benefits. Food pantries and soup kitchens—another source of food for many low-income people—can play a role in encouraging eligible immigrants to enroll in WIC, SNAP, and School Food. As one New York City community organizer explained, a food pantry is not only a place for people to pick up a bag of groceries each week or month. It can also serve as a safe haven, a place to get help without fear. Developing trusting relationships with community organizations that provide food, medical, and other services—and that can provide information and assistance enrolling in public food programs—is particularly important for undocumented migrants and their families, who often work and live their lives under the radar.

—Experience in rights-based organizing

Some immigrants may have participated in social justice organizing in their countries of origin or in the US, which can foster a recognition of the right to food, to social services, to secure work conditions, to freedom from harassment by immigration agents—in short, the right to a dignified life. Experience in rights-based organizing can make immigrants more likely to enroll in public food benefits, especially if their children depend on it. Finding ways to tap into this resource may help organizations serving immigrants to overcome some of the obstacles described in the next section.

Immigrant-Related Barriers

—Language and literacy barriers

Many low-income immigrants have limited English proficiency, limited formal education, and in some cases low levels of literacy. Overall, 49 percent of New York City immigrants over the age of 5 report limited English proficiency. More than 70 percent of Dominicans, Chinese, Mexicans, and Ecuadorians reported such limits.¹⁵ Language and literacy barriers, beyond limiting opportunities for economic advancement, make it harder to find and use information about public programs. Though New York's public agencies offer services in a range of languages, some immigrants speak languages that Human Resources Agency (HRA) staff are not equipped to communicate in, including indigenous languages spoken in Latin America or Africa. Reliable estimates of the size of this population do not exist, but based on 2011-2015 American Community Survey data, HRA provides written documentation in the nine languages spoken by about 83 percent of New Yorkers with limited English proficiency, meaning that 17 percent are not covered by the city's language access policy.^{21,22} As one respondent to our survey said:

“We must also take into account that for many people, Spanish or French is their second language, and that they are native speakers of indigenous languages...also often with limited schooling and low literacy levels.”

One respondent identified two related barriers: limited access to a computer or the internet and low digital literacy can make it difficult to obtain information about food benefits and other social services. In the last several years, New York City has initiated several efforts to make it easier to enroll in SNAP and other public benefits online.²³ While this can help users to reduce waiting time and avoid missing work, it may not benefit all sectors of the population, especially immigrants who may lack the access or knowledge to use such technologies. If fear of encounters with immigration agents deters immigrants from using existing language classes, these problems may worsen.

—*Shame around accepting public benefits*

Some immigrants, like many US-born people, may feel shame at needing public assistance, particularly when our national narrative says that prosperity and success are achieved through hard work. In tightly-knit communities, some may feel embarrassment at having others from their hometown know that they participate in safety net programs. Some noncitizens do not think they match the stereotype of someone on public assistance, and therefore do not consider applying; this perception may be a stronger barrier in rural areas compared to urban areas.^{24,25} Whether or not one feels shame depends in part on availability of and experiences with public services in immigrants' respective countries of origin.

—*Fear of immigration enforcement and distrust in public agencies*

Since the 2016 election, multiple reports indicate a marked increase in fear among immigrant communities, including those with lawful status.¹¹⁻¹⁴ Directors and program coordinators interviewed for this project reported that many new and returning clients have been afraid to share personal information, have refused to sign in during meetings, and have even requested that their records be destroyed. As one staff member of a Manhattan food pantry explained:

“[Since the election] we saw that people wouldn’t want to sign up, and if they signed up, they gave me a bogus date of birth or information. People would say ‘how are you protecting my information?’... We got a lot of calls saying ‘erase my case.’ Also, parents were concerned that if they apply for federal benefits, we are not in control of that information.”

Factors contributing to this growing fear include the expansion of immigration enforcement, termination of the Deferred Action for Childhood Arrivals (DACA) program and other temporary protected status programs, and threats to change the rules around green card eligibility, referred to as “public charge” rules.¹¹⁻¹⁴ The public charge issue in particular (see Box at right) has generated considerable confusion and uncertainty. Sixty percent of survey respondents indicated they thought their clients did not know that under current law, participation in SNAP does not have implications for public charge determinations. However, for some immigrants, distrust in immigration law rather than a misunderstanding of public charge rules is what prevents them from enrolling in public food programs. One survey respondent noted that:

“Immigrants who have green cards can be educated about the public charge issue, and in the past, they accepted that education. However, almost uniformly, they now consider immigration law to be unstable; so many will not take the risk.”

Public Charge Determinations

The US Citizenship and Immigration Services (USCIS) defines a public charge as “an individual who is likely to become primarily dependent on the government for subsistence, as demonstrated by either the receipt of public cash assistance for income maintenance or institutionalization for long-term care at government expense.”²⁶ USCIS makes a public charge determination when an immigrant seeks admission to the US or applies for a green card, not when an immigrant with a green card applies for citizenship. A decision that an applicant is likely to become a public charge can result in denial of the application. Under current law, only government cash assistance (e.g., TANF or state and local cash assistance) and institutionalized long-term care are considered in public charge determinations. Neither SNAP nor Medicaid benefits (except when used for long-term care, e.g., in a nursing home) trigger public charge findings. However, a draft executive order leaked in January 2017 and a separate proposal from the Department of Homeland Security leaked in early 2018 threatened to add other means-tested federal programs to the list considered in public charge determinations.^{9,27} The latest proposal singled out participation in SNAP, WIC, the Children’s Health Insurance Program, and Head Start, as well as receipt of the earned income tax credit, among the additional factors to be considered as possible grounds for a public charge determination.

Individual and household-level factors that facilitate access to food benefits include social networks that connect immigrants to community services, trust in local community organizations and public agencies, and experience in social justice causes. Individual and household-level barriers include language and literacy limitations, shame around needing public assistance, fear of immigration authorities, and unwillingness to provide personal information.

ORGANIZATIONAL PRACTICES

This section describes activities, approaches, and practices of immigrant-serving and food security organizations as they either facilitate or hinder immigrant access to food benefits. Many of the successes and challenges noted below build on lessons reported previously by other advocacy groups working on food and immigration justice.^{28,29} However, given the increase in fear described in the previous section of this report, organizations' ability to reach and enroll immigrants through appropriate language and cultural skills, dispel confusion and myths around eligibility, and circumvent requirements for identifying information has become acutely important in the current political climate.

Organizational Facilitators

—Staff language skills, cultural competency, and respect

Adequate language skills and the ability to communicate with immigrants with variable levels of literacy are important facilitators of awareness, enrollment, and continued participation of immigrants in public food programs. This includes providing written materials in multiple languages and using images in addition to text. Caseworkers should be culturally competent and show sensitivity to different cultural views around food and public benefits. Furthermore, providing services in an empathetic, non-discriminatory way fosters trust between service providers and immigrants in need of food assistance, which increases the chances that immigrants will enroll in food programs. A staff member interviewed for this report described how the Manhattan food pantry where she works is set up as a supermarket, with aisles of fresh produce, cans, and dried food where clients can choose what they need. Such settings help make people feel welcome and counter the shame many feel about asking for help, fostering trust in the organization and increasing the chances that immigrants will seek assistance. A staff member at a faith-based organization in Queens observed:

“The more and more distrust that happens to this community, the more and more isolated they're going to become and it's going to be hard on everybody. [...] And the impact on food? Before we just had to open the doors to get people in here. Now we have to sit down, talk to them, talk to their families, go back to their homes and talk to people in their homes, talk to the people in their churches, and say ‘this is okay, it's okay to come here. Here will be safe, you'll be okay.’”

—Education, outreach, and application assistance

Given the confusion surrounding public charge determinations, providing clear, up-to-date information is crucial in helping individuals understand and participate in the public food programs. Conducting ongoing staff trainings related to program and policy updates equips staff with accurate information to communicate to those they serve. Key informants also described the use of different physical locations and virtual platforms to transmit information, for example, posting flyers in hospitals, libraries, and schools, and communicating through news releases, Facebook postings, and advertisements in local newspapers.

Conducting outreach and enrollment at locations expected to be frequented by specific groups of immigrants can increase participation. For example, respondents described leading informational and enrollment sessions at Parent Committee meetings about school food programs. Similarly, providing multiple services in the same setting (for example, running a food pantry and legal clinic within a hospital that serves immigrants) is an efficient way to increase enrollment in various programs, especially if individuals struggle to cover the cost of transportation or cannot take much time off work to attend multiple enrollment appointments—a challenge many low-income people in general face. Once someone is willing to enroll, providing one-on-one assistance with applications, accompanying applicants to appointments at government sites, and helping to obtain documentation required to apply for benefits were cited as important facilitators of participation in public programs. Programs like Single Stop increase access to benefits by offering free, one-stop-shop eligibility screening for local, state, and federal benefits, along with application assistance, case management, and legal and financial counseling for low-income individuals.

Given that known people within the community may be the most credible and trusted sources of information, organizations should consider training or hiring community residents to serve as peer educators and outreach workers.

—Creation of networks with partners, allies, and communities

New York City-based staff described the establishment and use of partner and ally networks to facilitate the work of their individual organizations. For example, neighborhood defense committees can facilitate the spread of information and can also help monitor events at the neighborhood level; networks of staff and immigrants in positions of privilege can provide legal, financial, and technological help to supplement the work of connecting immigrants to public food programs. A staff member at an immigrant-serving organization in Brooklyn said:

“In our outreach for the Latino immigrant community at large, one of the things that we were working toward [was] implementing Comités de Defensa, which are based on a model of people spreading information

in their neighborhoods, equipping leaders to then organize within neighborhoods to [...] establish more networks of communication about what they see in their neighborhoods, if ICE [Immigration and Customs Enforcement] comes to their neighborhood who do they call, and connecting people to hotlines.”

Organizational Barriers

—Language barriers, inadequate cultural competency, and discrimination

Despite the recognition that language skills and cultural awareness are among the top facilitators of immigrant access to benefits, survey respondents and key informants agreed that language and cultural awareness needs in New York City are not being met. Eighty percent of survey respondents reported language barriers as a moderate to major obstacle to SNAP enrollment, and 74 percent reported lack of cultural competency among HRA caseworkers as a moderate to major barrier (Figure 1). Similar issues were reported about WIC: 62 percent of respondents qualified language barriers as a moderate to major obstacle for WIC enrollment, and 44 percent reported lack of cultural competency among HRA caseworkers as a moderate to major barrier. Most respondents agreed that language access services are not provided equally at different HRA offices for immigrant families interested in accessing SNAP, and that HRA is failing to provide written communication services for clients with limited English Proficiency. Furthermore, discriminatory or judgmental attitudes on the part of caseworkers were cited as an ongoing barrier. One survey respondent suggested that:

“Caseworkers should be less judgmental and intrusive when assisting clients in need of crucial services for their survival.”

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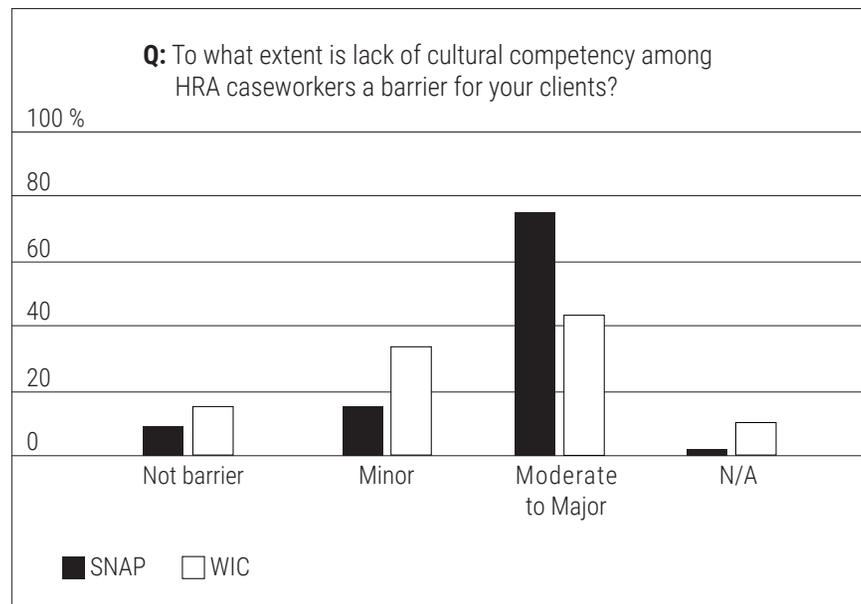
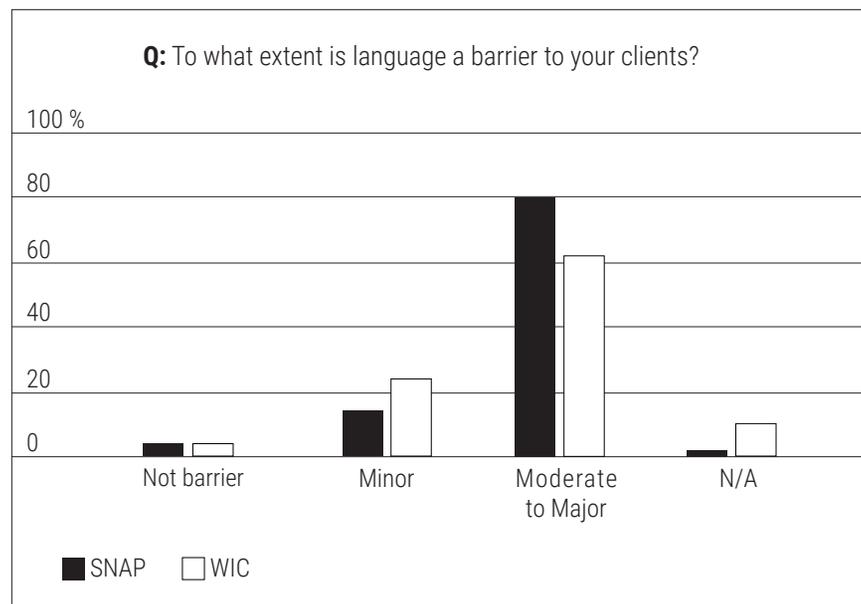


Figure 1. Survey respondents’ assessment of language and inadequate cultural competency among HRA caseworkers as barriers their clients face in accessing SNAP and WIC.

—*Inadequate outreach and education*

Lack of awareness and misinformation on SNAP, WIC, and School Food programs were cited as barriers to participation (Figure 2), suggesting there is room for improvement in outreach and communications activities led by immigrant-serving and food security organizations as well as city agencies. These programs and systems of enrollment are difficult for many native-born people to navigate; language barriers and social isolation associated with immigration status can make it even harder for some immigrants to find accurate information about the services they are eligible for. A staff member at a non-profit in the Bronx observed:

“The whole thing with ‘go online to access HRA,’ things like that I don’t think [are] effective for immigrant families. Or at least immigrant families with low digital literacy, no internet, no access to a computer...and I’m sorry, but calling 311 doesn’t work either. [...] When you tell someone ‘just call 311 and ask about food benefits’, [...] that’s not actually what’s going to work fast.”

—Continues on page 22—

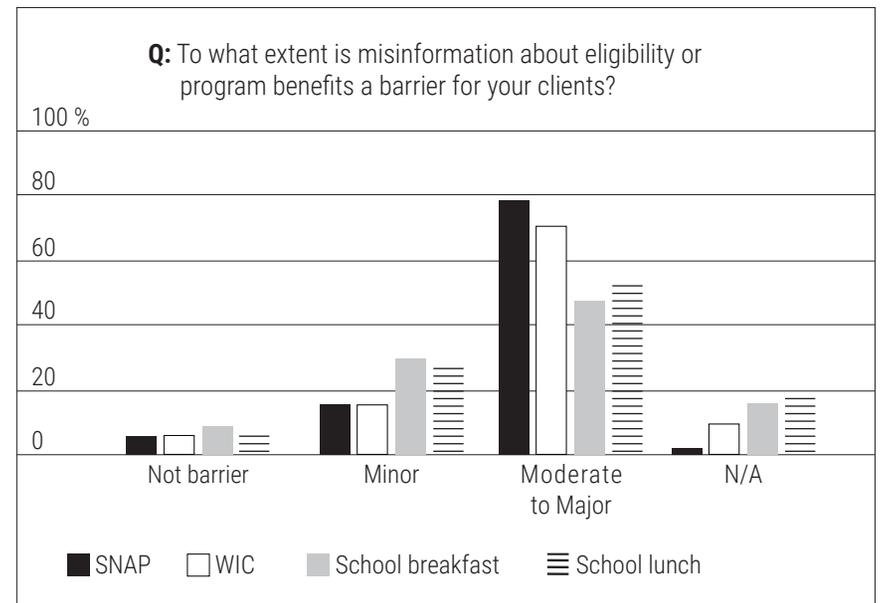
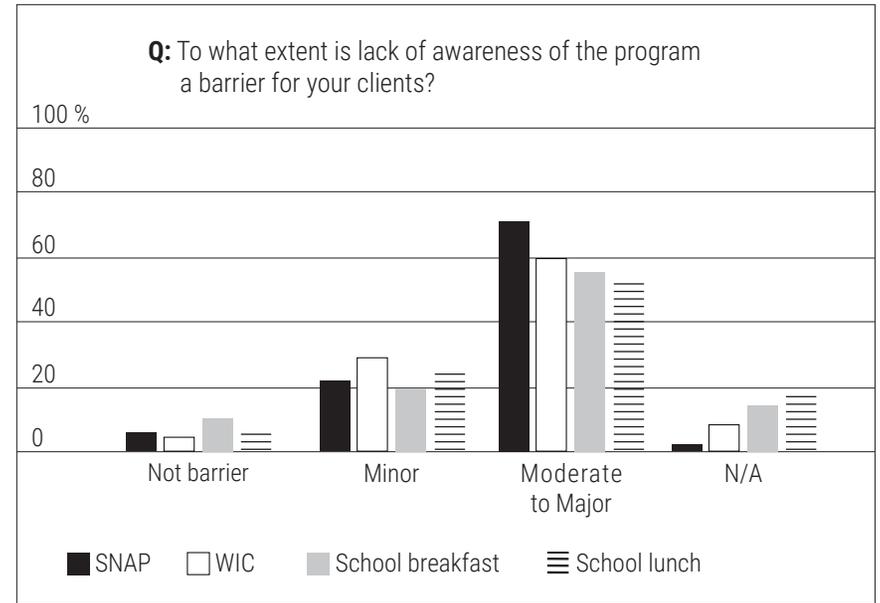


Figure 2. Survey respondents’ assessment of lack of awareness of the program and misinformation about eligibility or program benefits as barriers their clients face in accessing SNAP, WIC, School breakfast, and School lunch.

—Enrollment process

Various aspects of the enrollment process deter people from participating in public programs. Most survey respondents believe their clients consider SNAP benefits worth the effort of applying. However, 76 percent of respondents characterized the administrative burden of the application process, particularly the employer verification letter, as a moderate to major obstacle in SNAP enrollment. Forty-six percent of respondents qualified the physical exam required in WIC enrollment as a moderate to major barrier. Survey respondents also described negative experiences at HRA sites associated with complex bureaucratic procedures as a barrier to enrollment, experiences also reported by non-immigrant households. A survey respondent asked:

“Everything from overcrowding in the waiting area... to long hours of waiting... to technical glitches in the enrollment software... to ill-functioning self-help kiosks... to poorly calculated, and hence, tiny (almost useless) monthly awards... etc. Why would anyone tell their friends to subject themselves to these stresses?”

—Documentation requirements

Given the very real threat of deportation and fear around public charge determinations, the collection of identifying information is a particularly strong barrier preventing many immigrants from enrolling or renewing their participation in food programs for which they or their children are eligible. For example, requesting a social security number on school food enrollment forms, even though it's not required, may deter families from enrolling their children in the school lunch program. Staff members interviewed for this report described some of the steps they are taking to protect clients, such as conducting know-your-rights trainings, but they cited the need for stronger assurances from city officials that personal data related to immigration status will not be shared with Immigration and Customs Enforcement (ICE) agents. One survey respondent noted:

“It is not always possible to convince clients that information submitted during enrollment for these programs will not end up in the hands of immigration authorities, which could make their lives difficult in the future. [...] Although our clients generally trust us to guide them in their quest to overcome poverty, there is simply no ‘proof’ that will convince some of them that government programs are safe for them to enroll in.”

—Characteristics of School Food Programs As Barriers

Several specific characteristics of School Food programs act as barriers to participation.

Survey responses suggest that some parents believe their children do not like the food offered in school and that the parents do not find school lunch culturally appropriate or religiously acceptable (54 percent of respondents qualified this belief as a moderate to major barrier). For some families, getting their children to school before classes start may be a barrier to participation in the school breakfast program, an obstacle that Breakfast After the Bell will address once it is expanded to more schools.³⁰

—Limited collaboration between food security and immigrant-serving organizations.

Finally, the issue of food insecurity among immigrants cuts across two sectors that do not typically work together. As with other sector-specific organizations, food security organizations tend to work with other food security organizations, while immigrant-serving organizations tend to work with other immigrant-serving organizations. The lack of a shared practice and understanding between these two types of organizations is a barrier to effective and coordinated efforts to fight food insecurity among immigrants, especially in context of increasingly limited resources. In considering different approaches to increase enrollment, the majority (between 65 and 75 percent) of survey respondents indicated that strategies involving partnerships between various groups, including anti-hunger and immigrant-serving advocacy and service organizations, the SNAP office, local food pantries, and local school districts, would be very effective, reflecting the potential impact of increased collaboration.

Organizational practices can facilitate or hinder access to food benefits. Organizational factors that facilitate immigrant access to food benefits include adequate language skills and cultural competency of staff, respect on the part of service providers, staff training on program and policy updates, provision of multiple services in one location, application assistance, and the support of ally networks. Many organizational barriers are simply the reverse of the facilitators: inadequate language skills and cultural competency of staff, discrimination among service providers, and insufficient outreach and education. Other barriers relate to burdens of the enrollment process, documentation requirements, certain characteristics of food programs (the type of food and the time it is served), and limited collaboration between food security and immigrant-serving organizations.

CITY, STATE, & FEDERAL POLICIES AND LAWS

There are numerous policies that state and municipal governments can implement to facilitate immigrants' access to the resources they need. However, there are also significant policy barriers that discourage immigrants from utilizing the benefits available to them. In this section we explore strategies involved in shaping the current policy environment and how those strategies influence immigrant communities. We draw on examples from New York as well as from other jurisdictions around the country.

Policy Facilitators

—Sanctuary policies and campaigns

Sanctuary cities and states are jurisdictions that limit their cooperation with ICE agents particularly around local law enforcement and provision of critical services like food, education, and health care. These policies are meant to safeguard immigrant residents, but they are also meant to protect native-born residents, by encouraging everyone to seek essential services regardless of immigration status.³¹ An example of a sanctuary policy is Governor Cuomo's executive order prohibiting state law enforcement agents from asking or sharing information about individuals' immigration status unless investigating criminal activity.³²

Using paid media, social media, and informal communication methods, cities can also create campaigns in partnership with immigrant rights groups that provide some sense of security for immigrants seeking access to services. The You Have Rights New York City campaign, sponsored by the Mayor's Office and the New York City Commission on Human Rights, identifies rights specific to immigrants. The New York City Human Rights Law is unique in including immigration status as an explicit protected status; this protection is not currently offered at the state level. Given many immigrants' concerns about their personal information getting into the wrong hands, it is also important for city and state governments that fund food and other social programs to ensure that their requirements for monitoring the use of funds call for the collection of identifying information only where absolutely necessary. For example, New York City's IDNYC program, which allowed all city residents to acquire a valid ID regardless of immigration status, has a provision allowing for the destruction of its database. This helps protect its information from being used by law enforcement.³³

—Legal aid

Facilitating access to legal aid is another way to protect immigrants and their access to essential services. For example, in April 2017, Governor Cuomo allocated \$10 million to the Liberty Defense Fund, which coordinates a network of advocacy organizations, law firms, and university legal departments to provide free legal services to immigrants across the state, regardless of immigration status.³⁴ Across the country, the state of California allocated \$45 million for immigration services, including deportation defense attorneys, as a way to address strengthened immigration enforcement by federal agencies under President Trump.³⁵ Policies that create, support and maintain meaningful legal resources for immigrants are central to creating an atmosphere of stability that allows community members to feel safe.

—Designated agencies for immigrant affairs

Implementing policies that support immigrants requires that states and municipalities make lasting commitments to work with immigrant communities. One of the best ways to do that is to create an Office of Immigrant Affairs designed to facilitate programs and policies that encourage integration of immigrants into all levels of the community. Cities around the country, including New York, Philadelphia, Baltimore, and Los Angeles, use their offices of immigrant affairs to build bridges to immigrant communities and to craft policies that address the needs of foreign-born residents around a range of issues, including food security, housing and education. Mayors can provide additional power and resources to these offices and use them to connect city and state agencies that work with immigrants. In this way they can adapt outreach and service provision strategies to meet the needs of immigrant communities in the current political climate.

—Litigation

One of the more high-profile ways cities are asserting their support for immigrants is by fighting unjust laws and governmental actions in the courts. For example, Philadelphia, Chicago, San Francisco, and Seattle are suing the Trump administration for its attempt to restrict federal funding to cities and states that adopt sanctuary policies.³⁶ These and other cities are attempting to develop legal strategies that municipalities can use to address some of the more worrisome actions at the federal level. These strategies could perhaps be extended to a focus on access to food and other public services, for example by arguing that federal immigration enforcement activities prevent municipalities from providing public benefits to all who are eligible, as required by state and federal law. Litigation may be a critical tool in protecting immigrant communities around the country.

—Budget allocation

Policies that increase public funding for immigrant-serving programs can also provide some sense of security for low-income immigrant communities. In New York City, former City Council Speaker Melissa Mark-Viverito pledged to expand the role of the Mayor's Office of Immigrant Affairs to better coordinate all city services affecting immigrants.³⁷ As the leader of the Council, she had the power to influence the allocation of funds from the City's budget to help achieve this. Such allocations will be critical for addressing the current need to rethink how local governments deliver service including food benefits, to immigrant populations.

—Policies repurposing or expanding existing resources to benefit immigrants

Policies that repurpose existing programs can also strengthen the safety net for immigrants. SNAP incentive programs at farmers markets like Health Bucks (New York City), Boston Bounty Bucks (Boston), and Fresh Exchange (Portland) are existing vehicles that can be used to address food security issues for immigrant populations. For instance, in New York City, council members can purchase Health Bucks with discretionary funds and distribute them to constituents however they see fit, including providing them without the stipulation that they be used as incentives for SNAP or WIC purchases. Used this way, residents can utilize Health Bucks to purchase fresh produce at farmers markets without needing to enroll in a program. To reduce food insecurity meaningfully, both the funding allocation and the promotional campaigns for Health Bucks would need to be expanded significantly.

—Universal school food policies

For immigrant families, schools are one of the most trusted settings in their community and school food often plays a vital part in establishing food security for children of these families. Policies of universal school breakfast and lunch for the school year and during summer meals programs provide an added resource for families in need, particularly those concerned with sharing their personal information. Allowing every child to access a meal, regardless of their ability to pay, lowers the required administrative engagement for families and helps allay fears that information provided on an application form might be used to assess immigration status. Recently, New York City adopted a policy of universal free school lunch for all students, after doing the same for breakfast in 2003.^{38,39} This type of policy expands the options for reducing food insecurity among immigrant populations. In addition, making sure that all children receive culturally acceptable food can increase uptake. Efforts are currently underway to expand access to kosher and halal foods in school food programs in New York City, another approach that benefits both immigrant and non-immigrant families.⁴⁰

Policy Barriers

—Public statements and policies that promote stigma

The stigmatization of immigrants is not a new phenomenon in the United States. Exclusionary laws have been enacted at numerous points in this country's history, particularly during times of economic crisis or war, including the Chinese Exclusion Act, the 1924 Immigration Act, the 1942 Japanese Internment Executive Order, and "Operation Wetback" in 1954.⁴¹ The rise in anti-immigrant sentiment since the 2016 election is another episode in this nativist history that we must overcome.

Existing challenges that immigrants face in using government benefits have been exacerbated by the anti-immigrant positions of the Trump administration. Since January 2017, the Trump administration has expanded immigration enforcement; terminated the Deferred Action for Childhood Arrivals (DACA) program; rescinded temporary protected status (TPS) for nationals of Nicaragua, Haiti, and Somalia; banned immigrants from select majority-Muslim nations; changed the eligibility rules for certain tax credits previously available to immigrants; and requested the introduction of a question about US citizenship to the 2020 census (Appendix). To date, courts have rejected some discriminatory policies but upheld others.

In two draft executive orders leaked during the first month of the Trump presidency, the administration also threatened to include federal means-tested programs like SNAP among the programs used in public charge determinations, and to pursue the government's existing authorization to seek reimbursement from family members sponsoring an immigrant if they use public programs within a specific period of time. One of the orders recommended the development of a report that quantifies the savings gained by ensuring that undocumented immigrants receive only the public benefits they are eligible for.⁴² The executive orders aim to strengthen already-stringent restrictions on immigrant entry and use of public services, making it difficult to see them as anything more than an effort to score political points and alarm immigrants, and making it less likely that they will access the services they are entitled to.

This stigmatization is reinforced through public statements. In June 2017 President Trump held a widely covered political rally in Iowa where he said, "The time has come for new immigration rules, which say that those seeking admission into our country must be able to support themselves financially and should not use welfare for a period of at least five years. And we'll be putting in legislation to that effect very shortly."⁴³ The president neglected to mention that the legislation he proposes is already law. Statements like these create the wrong impression that immigrants are using services that they are not entitled to, which stokes nativist anger and further deters immigrants from the use of public benefits for which they are eligible.

—Cuts to social services

The Trump administration has threatened to reduce or eliminate funding for nonprofit organizations, public programs, and even for entire cities or states in ways that would have repercussions for both immigrants and citizens. For example, in the 2018 and 2019 budgets, Trump proposed eliminating the Community Development Block Grant, which is used in part to fund Meals on Wheels, the nonprofit-run program that brings meals to millions of homebound seniors across the country.^{44,45} The administration has targeted public food programs, including a proposed 21 percent cut to the USDA budget, which would likely reduce school food funding.⁴⁶ Comments from Republican lawmakers and plans outlined in the president's 2019 budget indicate a desire to cut SNAP by closing alleged loopholes, implementing eligibility reforms, and converting

the program to a block grant.^{47,48} In April 2018, the President signed an executive order directing federal agencies to propose work requirements and ways to reduce spending on all social programs, with particular interest in restricting Medicaid and SNAP.^{49,50} In a clear example of the intersection of nativist and anti-safety net sentiment, the order also calls on agencies to outline how they are ensuring that immigrants are not receiving benefits for which they are not eligible. Any new restrictions would add to what was imposed by President Bill Clinton's historic 1996 welfare reform bill, which radically reshaped a number of welfare programs and put strict limits on who could get benefits and how much participants could receive.^{51,52} Scenarios like these sow confusion and fear about what may or may not happen, and appear to be politically motivated rather than designed to solve any real problem.

President Trump has also tried to punish so-called sanctuary cities or states through an executive order that withholds federal funds from those areas.⁵³ Challengers to the order are currently working their way through the courts and there is some indication that the executive order will be blocked by the judiciary.⁵⁴ However, the prospect of losing funds adds to the sense of scarcity and instability that make it harder for public agencies to conduct outreach and provide services effectively. If the citizenship question mentioned above is reintroduced to the 2020 census, the expected increase in undercounting among immigrants could result in less funding for food and other public programs in states and localities with large immigrant populations, such as New York.

—Documentation requirements

As discussed in the two previous sections of this report, the requirement of documentation to enroll in public benefits prevents many immigrants from using services for which they or their children are eligible. This barrier extends to state policies regulating driver's licenses. Many states around the country, including California, Nevada, Maryland, and Connecticut, provide driver's licenses regardless of immigration status.⁵⁵ Though the city's IDNYC was a step in the right direction, New York State does not currently issue driver's licenses to undocumented immigrants. This makes it difficult for many immigrants particularly in rural parts of the state to enroll in food programs and social services.

City, state, and federal policies and laws can facilitate or hinder access to food benefits. Policies and laws that facilitate immigrant access to food benefits include sanctuary city policies, provision of legal aid, creating or strengthening agencies for immigrant affairs, active litigation, budget allocation, incentive programs that expand existing resources, and universal school food policies. Policy barriers include exclusionary public statements and policies, reductions in funding for social services, as well as documentation requirements for enrollment in public programs and driver's licenses.

RECOMMENDATIONS FOR CITY & STATE LEGISLATORS

Since President Trump took office, there has been a whirlwind of threats and successful efforts to both marginalize immigrants and weaken public food programs. The focus of this report has been the potential impact of these two initiatives on New York's immigrant communities. Actions since January 2017 include increased immigration enforcement, termination of DACA, threats to consider SNAP and WIC participation in public charge determinations, proposed cuts to SNAP funding, and a request that additional work requirements be imposed on SNAP and other social programs. One primary consequence of these actions, according to New York-based program staff consulted for this report, has been a steep rise in immigrants' fear and uncertainty about being able to stay in this country. This fear is exacerbating barriers many immigrants already face in using food benefits for which they are eligible, including SNAP, WIC, and school food. This finding is echoed in media and advocacy reports from around the country.

While New York elected officials, activists, and voters will need to continue to advocate for the basic American traditions of feeding the hungry and welcoming immigrants, it seems likely that in the next few years, powerful national forces will continue to oppose such policies. Thus New York has both the obligation and the opportunity to proactively chart new paths in creating city, state, and community programs that reaffirm these values. To tackle the immediate barriers immigrants face in accessing food and food benefits, we recommend the following four broad strategies:

1—Create and expand programs with city and state funding that bring food assistance to immigrants without requirement of documentation.

- The city and state could supplement federal funding for summer meals for school children to also feed their parents and other family members.
- The city and state could encourage more communities to implement the Community Eligibility Provision for school meals, and partner with immigrant-serving organizations to publicize such changes.
- The city and state should expand Health Bucks, the city program to provide subsidies for fruits and vegetables in farmers markets and elsewhere and New York State Food Bucks, a similar state program in western New York State, to increase distribution of these vouchers in immigrant communities.

2—Develop and expand multi-pronged communications and policy initiatives to counter stigmatizing messages and policies against immigrants from federal officials and the media.

- New York City can promote IDNYC, the identity card available to all New Yorkers; expand sanctuary city protections; and challenge the legality of discriminatory policies.
- City and state leaders should give more public attention to the vital role immigrants and members of mixed-status households play in our culture and economy.

3—Strengthen the linguistic, cultural, and organizational capacity of community organizations and social service agencies that serve immigrants to ensure that immigrants can find the help they need to avoid food insecurity.

- The city, state, and coalitions of social service organizations should assess cultural competencies of agency staff and provide ongoing cultural competency trainings to address needs.
- The city, state, and social service agencies should increase access to high-quality interpretation services.

4—Improve outreach, enrollment, and education initiatives of community and public agencies that serve immigrants to ensure that all immigrants are enrolled in food programs for which they are eligible and fully aware of their rights.

- New York City can enhance the impact of existing programs: for example, every organization should be promoting the new universal free lunch program and assisting immigrant parents to monitor implementation, so their children's needs are met.
- The city and state could expand Single Stop-type programs that provide one-stop-shop eligibility screening for public benefits, along with application assistance, case management, and legal and financial counseling for low-income individuals.
- Immigrant serving and anti-hunger organizations should improve and expand outreach and education programs and hire additional trusted members of immigrant communities to carry out these roles.

These recommendations include immigrant-specific strategies, to address the distinct challenges immigrants face in using food benefits, as well as strategies that would benefit low-income people in general, as many of the barriers discussed in this report are not limited to immigrants. Improving programs that benefit the poor in general tends to generate more political support and is also a way to reduce stigma against immigrants. We list additional strategies, along with the facilitators and barriers described in the previous sections of the report, in Table 3.

Reliance on food assistance has causes deeply rooted in our society: low wages, lack of employment and other benefits, the high cost of health care, and inadequate affordable housing. Many low-income New Yorkers face these challenges, which will increase if the Trump administration succeeds in implementing other aspects of its policy agenda related to taxes, health care, housing, and labor laws. In the long run, we need to take on these fundamental causes of poverty in order to address food insecurity effectively. However, these four recommendations point to steps New York City, state and social service agencies can take now to tackle the more immediate barriers described in this report.

We direct these recommendations to both New York City and State for several reasons. First, New York City has more hungry and food insecure people and more immigrants than any other US city. Reversing more inclusive immigration and food assistance policies will have an especially severe impact on our city and state. Second, New York has a tradition of protecting and expanding these values. As the federal government steps back, our city and state have the opportunity to step forward, demonstrating to the nation and the world that some Americans still seek to uphold our core values. Third, developing new policy initiatives here sets an example for other cities and states to follow and showcases policy options that can be discussed in the 2018 and 2020 national elections. While we recognize that social service agencies will need new streams of funding to take on the tasks we suggest, we believe city and state elected officials and philanthropic organizations can be enlisted to provide this support.

Finally, we believe that linking these two issues creates the potential for new, more powerful, and compelling local and national alliances that can advance the moral, health, and economic arguments for food assistance and immigrant inclusion.

We invite city and state policy makers to lead the nation in forging humane, effective, and practical ways to ensure that immigrants and other New Yorkers have access to the food they need to maintain health and function as full members of our society. By acting now, we can avoid the health, economic, human, and moral costs of allowing hunger to increase in our city and state.

Table 3. Summary of Facilitators of and Barriers to Immigrant Access to Food Benefits

LEVEL	FACTORS THAT FACILITATE ACCESS TO FOOD BENEFITS	BARRIERS TO ACCESS TO FOOD BENEFITS	POSSIBLE STRATEGIES TO PROMOTE ACCESS TO FOOD BENEFITS AT THIS LEVEL
Immigrant knowledge, beliefs, values	<ul style="list-style-type: none"> • Social networks that connect immigrants to community services • Having family members or relatives receiving food benefits • Immigrant trust in community organizations and local government agencies • Experience in rights-based or social justice community organizing 	<ul style="list-style-type: none"> • Limited knowledge of English or literacy (including digital literacy) • Shame around accepting public benefits • Unwillingness to provide personal information to programs • Fear of becoming a public charge 	<ul style="list-style-type: none"> • Public education and awareness campaigns on availability and eligibility for food benefits and against stigmatization of benefits • Accurate information campaigns on immigration policies and current enforcement practices • Strategies to build social support and community solidarity within immigrant communities and between immigrant and non-immigrant populations • Increased availability and access to ESL classes • (Also see strategies at organizational and policy levels)
Organizational practices	<ul style="list-style-type: none"> • Adequate language skills and cultural competency of staff • Provision of services in empathetic, non-discriminatory way • Provision of information in multiple languages • Staff training on program and policy updates • Conducting outreach, education, and enrollment in multiple settings • Application assistance • Provision of multiple services in one location • Support of partner/ally/community networks 	<ul style="list-style-type: none"> • Inadequate language skills and cultural competency of staff • Discrimination on the part of service providers • Insufficient provision of communication services for Limited English Proficiency clients • Inadequate outreach and education • Aspects of enrollment requirements perceived as burdensome by clients (paperwork, physical exam, long waits, discourteous staff) • Documentation requirements • Characteristics of School Food program (type of food and time it is served) • Limited collaboration between food security and immigrant-serving organizations 	<ul style="list-style-type: none"> • Assessment of staff competencies and training to address needs • Clear policies and enforcement to prevent discrimination • Hiring staff with appropriate language and cultural competencies • Expanded ESL programs • Expanded and improved outreach and education • Increased co-location of services • Policies that reduce client fears of ICE encounters and strengthen protection of personal information • Expanded partnerships between food security and immigrant-serving organizations • (Also see strategies at policy level)
City, state, federal policies and laws	<ul style="list-style-type: none"> • Implementing sanctuary policies • Anti-discrimination policies/campaigns • Protection of immigrant identity • Provision of immigration legal aid • Strengthening public systems/agencies for immigrant affairs • Litigation • Budget allocations • Policies that expand/repurpose public funds for food programs • Universal School Food policies 	<ul style="list-style-type: none"> • Public statements and policies that promote stigmatization and social isolation of immigrants • Reductions in public funding for immigrant serving or anti-hunger nonprofit groups • Funding restrictions to SNAP, WIC and School Food • Cuts in federal funding to sanctuary cities or states • Documentation requirements 	<ul style="list-style-type: none"> • Public statements from elected officials that discredit stigmatization of immigrants, poor people, and food benefit recipients • Immigration policies that reflect American values of inclusion and opportunity • Easing documentation requirements for food benefits and driver's licenses • Expanded public education campaigns on food benefits and eligibility • Development and expansion of policies and programs that bring food to immigrants without extensive documentation requirements (e.g., Health Bucks, Universal Free Lunch, Summer Meals, Emergency Food Programs, etc.)

APPENDIX: TRUMP ADMINISTRATION PROPOSALS & ACTIONS RELATED TO IMMIGRANTS AS OF MAY 2018

Proposed policies

Modification to Department of Homeland Security regulations on public charge determinations (leaked in February and March 2018)

- Threatened to extend the list of programs that qualify an immigrant as a public charge at time of application for a green card to include any government assistance in the form of cash, aid, services, or other relief. Currently, only government cash assistance and institutionalized long-term care are considered in public charge determinations. Programs singled out in the proposal include SNAP, WIC, the Children’s Health Insurance Program, Head Start, and insurance subsidies like those provided by the Affordable Care Act. Receipt of these benefits would weigh against an immigrant applying for a green card, even if the benefits were for their US-citizen children.
- The version leaked in March 2018 would add receipt of the earned income tax credit to the factors considered in public charge determinations.
- Certain benefits would continue to be excluded from public charge determinations, including emergency or disaster relief, receiving free or reduced-price school lunches, and earned benefits such as Medicare and disability insurance.

Executive Order on public charge determination: “Protecting Taxpayer Resources by Entrusting Our Immigration Laws Promote Accountability and Responsibility” (leaked in January 2017)

- Threatened to add federal means-tested programs, which include food programs, to the list of programs that qualify an immigrant as a public charge at time of application for adjustment of status. Currently, only government cash assistance and institutionalized long-term care are considered.
- Threatened to change the way sponsor liability works. Currently, immigrants who enter the country based on the family immigration system

need a family member to sponsor them. The government is authorized to seek reimbursement from the sponsoring family member if the immigrant uses Child Health Insurance Program, Supplemental Security Income, Temporary Assistance for Needy Families, and non-emergency Medicaid within a certain period, but has not acted on this authority in the past. The executive order threatened to exercise this authority and to extend the number of programs for which the government could seek reimbursement.

- Proposed to restrict green cards for “low-skilled,” low-income immigrants.

Signed executive orders and acts

Executive Order on safety net programs: “Reducing Poverty in America by Promoting Opportunity and Economic Mobility” (April 2018)

- Orders federal agencies to propose additional work requirements and ways to reduce spending on all social programs, including Medicaid and SNAP. The order also calls on agencies to outline how they are ensuring that nonqualified immigrants are not receiving benefits for which they are not eligible.

Tax Cuts and Jobs Act (December 2017)

- A little-noticed provision in the overhaul of the tax code adds restrictions on immigrant families’ eligibility for public programs and economic supports such as the Child Tax Credit by requiring the use of a Social Security Number. Previously, immigrant workers without a Social Security Number could use an Individual Taxpayer Identification Number to claim the Child Tax Credit. Most of the 3 million children in low-income families affected by this are US citizens in mixed-status families.

Termination of Temporary Protected Status designation for nationals of Sudan (September 2017), Nicaragua (November 2017), Haiti (November 2017), and El Salvador (January 2018)

- Allows the protected status of 1,000 Sudanese, 59,000 Haitians, 5,300 Nicaraguans, and 200,000 Salvadorans, many of whom have lived in the US for decades following natural disasters or armed conflict in their home countries, to expire, ending their protection from deportation.

Executive Order to terminate the Deferred Action for Childhood Arrival program (September 2017)

- Allows the Deferred Action for Childhood Arrivals (DACA) program to expire on March 5, 2018, allowing up to the 690,000 currently enrolled undocumented immigrants brought to the US as children to lose work authorization and protection from deportation.

Executive Order known as the Muslim ban: “Protecting the Nation from Foreign Terrorist Entry into the U.S.” (January, March, September 2017)

- The latest version suspends the entry of nationals from six majority-Muslim countries and two other countries into the US: Chad, Iran, Libya, Somalia, Syria, Yemen, North Korea, and government officials from Venezuela. Chad was removed from the list in April 2018.

Executive Order on immigration enforcement: “Enhancing public safety in the interior of the US” (January 2017)

- States that “abuse” of public programs makes someone a priority for deportation, defined as “hav[ing] knowingly defrauded the government or a public benefit system”.
- Updates the category of individuals to be prioritized for removal and includes a sanctuary city ban on federal funding. The scope of this order was later narrowed, but cities around the country continue litigation against it.
- Declares that the Privacy Act, which governs the collection and use of individuals’ personally identifiable information by federal agencies, only applies to US citizens and legal permanent residents, even though this has always been the case.

Of all the proposals and actions described above, there have been no official changes with respect to immigrant access to food benefits. However, the tangible increase in immigration enforcement, termination of DACA and various TPS programs, and the “Muslim ban” have increased confusion and fear that make immigrants less likely to seek food and other public benefits.

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