

Testimony of the CUNY Urban Food Policy Institute before
The Committee on Immigration, jointly with the Committee on General Welfare and the Committee
on Health

The Impact of the Proposed “Public Charge” Rule on NYC, November 15, 2018

Good afternoon. I am Nicholas Freudenberg, Distinguished Professor of Public Health at the City University of New York Graduate School of Public Health and Health Policy and the Director of the CUNY Urban Food Policy Institute. Our Institute provides evidence, policy analysis and advocacy and assistance to other organizations to help solve urban food problems. I am honored to testify today at this oversight hearing convened by the Committees on Health, Immigration, and General Welfare to assess the impact of the proposed change in rules regarding the “public charge” determination for non-citizens.

While the proposed change in rules has the potential to produce a variety of negative health, social and economic consequences, my testimony will focus on its potential impact on food security for immigrant families and communities in New York City.

And while this hearing is focused on the proposed change in the public charge rule, it is important to note that the White House and Congressional Republicans have enacted or proposed other changes that could worsen food insecurity here in New York City. These include proposed cuts in SNAP funding, new work requirements for SNAP beneficiaries, more aggressive enforcement of immigration rules, and a concerted campaign to raise the level of fear among immigrants. Because each of these changes has the potential to exacerbate the negative impact of the others, in my testimony today, I will discuss the cumulative consequences of this cascade of proposed changes rather than only those of the public charge rule.

Why is food security important to New York City? A robust body of public health evidence demonstrates the negative consequences of food insecurity and hunger on children, families and communities. Compared to food secure individuals, those experiencing food insecurity are at higher risk of behavioral and cognitive problems, coronary heart diseases, diabetes, hypertension, depression, physical inactivity and poor health status. Food insecurity is also associated with overweight and obesity since those with inadequate resources for food are more likely to choose less expensive calorie dense but nutrient poor foods. Food insecure learners of all ages, from preschool to college, are less likely to achieve academic success than their food-secure peers. The health and social consequences of these food-insecurity related conditions impose human, economic and social costs on our city and our society. Food insecurity is also a moral problem. It is one of the most dire and traumatic consequences of poverty and a daily reminder of inequality.

A [report](#) the CUNY Urban Food Policy Institute published last June, *Expanding Immigrant Access to Food Benefits in New York City: Defining Roles for City and State Government*, based on a survey of frontline staff and interviews with leaders of food security and immigrant serving organizations in New York City, found widespread belief that the many policy changes on immigration and food benefits were leading immigrants to disenroll or avoid participation in food benefit programs for which they were eligible. These changes led some immigrant families to stop coming to food pantries or SNAP (and even WIC, which is not part of the proposed changes) enrollment centers for fear of encountering immigration agents. Even before the proposed public charge rule was officially announced, many immigrants were deciding to forego food benefits. Since about one million New York City immigrants live in so called mixed-status households, where some family members are citizens and others are not, these fears extend to US citizens.

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 the last three years, New York City has made progress in reducing the number of food insecure individuals, due in part to municipal and state policy changes and in part to the strong economy of the last three years. But with the proposed changes in public charge rules and other cuts to immigrant food benefits, New York City now risks seeing a rise in food insecurity. Considering that foreign-born New Yorkers now contribute more than twenty percent of the city's total GDP, increase in food insecurity among this population will also have adverse consequences for the city's economy and prosperity.

As a longtime New York City resident, I remember well the early 1980s when President Reagan ended federal support for creating new affordable housing. Prior to that time, homelessness was a modest problem affecting mostly older men with drug and alcohol problems. Afterwards, homelessness spread to women and children, families, young people and the numbers continued to grow. In some ways, the decision to end federal support for affordable housing was a fundamental cause of four decades of an affordable housing crisis. This crisis contributed to the city's epidemics of tuberculosis and crack cocaine and it made it more difficult to control the spread of HIV. The long shadows of federal policy decisions and the inability of the city and state to devise solutions at a scale needed to reverse the problem has cost the city billions of dollars, buckets of tears, and untold pain and suffering.

In my opinion, New York City now faces a comparable crisis. An increase of food insecurity and hunger, whether due to changes in food or immigration policy, loss of federal funding for other safety net programs, or further increases in income inequality, could precipitate a surge of health and social problems. To reduce this risk, New York City and State legislators can embrace what we in public health call the "precautionary principle", the belief that it is better to act with compelling albeit uncertain evidence than to wait for the bodies to pile up. City and state legislators can develop local and state responses to reduce food insecurity and its federal

policy-induced rise now—or they can wait until we see the health, educational and social consequences of rising food insecurity and leave it to our children and grandchildren to pay the costs.

In the coming weeks, our Institute, in consultation with several food security and immigrant serving organizations, will propose a set of policy and funding recommendations that will enable an immediate response to the threat of growing food insecurity. Possible policy options include:

1. Add incentives or discounts for healthy foods to IDNYC, the New York City municipal identification card
2. Increase the number of trusted community sites (e.g., churches, schools, community agencies) where immigrant and others food insecure families can pick up food
3. Expand support for emergency food programs to use mobile technology to schedule visits or deliver food to users' homes to allay immigrants' fears about frequenting public places
4. Strengthen the infrastructure for distributing and storing healthy food in programs that serve food to vulnerable populations
5. Enable community organizations to expand education and outreach to ensure that all New Yorkers know about the food programs for which they are eligible, including School Food, WIC and other food programs not restricted by immigration status
6. Launch educational campaigns against stigmatization of the food insecure or immigrants
7. Support providers serving immigrant populations to supplement federally-supported benefits for non-citizen family members (e.g., Summer meals to the parents and older and younger siblings of school children eligible for this federal program).

As the city's immigrant population becomes more vulnerable and afraid of using public benefits, city and state officials can strengthen and enforce vigorously other policies that support their economic well-being — from enforcement of wage laws to access to affordable housing — that will also enable immigrants to feed their households.

Ultimately, New York City government – and the civil society groups, health professionals and researchers in this room today – face an important choice. We can together acknowledge that NYC faces a potential food security crisis and commit to making the funding, policy and programmatic practice decisions that will avert that crisis. Or we can decide that the evidence of a crisis is not yet strong enough, delay action, hope for solutions from Washington or Albany –and risk contributing to a decade of growing food insecurity and hunger in New York City. I urge you to make the right choice and we commit the resources of our Institute to help make the informed decisions that will avert that outcome.

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