



FROM FOOD INSECURITY TO FOOD EQUITY:

A Roadmap to End Hunger in Illinois

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WHO WE ARE

Illinois Commission to End Hunger

The Illinois Commission to End Hunger is a public-private partnership composed of stakeholders from across the state dedicated to the belief that no one in Illinois should ever face hunger. The Commission was established by the Commission to End Hunger Act of 2010 with the purpose of developing an action plan to ensure cross-collaboration among government entities and community partners toward the shared goal of ending hunger in Illinois.

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Kate Maehr, Greater Chicago Food Depository, CEO

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BRINGING EQUITY TO FOOD ACCESS: A LETTER FROM THE CO-CHAIRS

Nearly 800,000 people filed new claims for unemployment in Illinois during the initial six weeks after Governor Pritzker's first disaster proclamation in response to COVID-19.¹ At its peak, Illinois's unemployment rate hit 17.2 percent in April 2020.² Many people who already lived paycheck-to-paycheck found themselves without income. Applications for food assistance programs skyrocketed. Food banks across the state struggled to keep up with the rising demand for food assistance. Food pantries in Warren and Henderson counties that typically serve 100 to 200 different families per month served over 800 families in one day on March 16; the line of cars lasted for seven hours. Hunger was prevalent in Illinois before COVID-19, but the pandemic has made hunger and the fragility of many working families more visible.

In addition to creating a sharp increase in hunger, the COVID-19 pandemic has laid bare our country's deep-seated racial inequities, which also permeate Illinois. Both the health and economic impacts of this pandemic disproportionately affect communities of color. At the same time, the uprising in response to the brutal killing of George Floyd and so many other Black men and women at the hands of the police has awakened a passion in our communities to stand up for racial justice. The landscape shifted in 2020, and so must our roadmap if it is to take us where we need to go.

In summer 2020, the Commission engaged stakeholders around the state to identify recommendations for addressing both food insecurity and the root causes of poverty and racial inequity. We engaged people experiencing food insecurity, representatives from community-based organizations, and members of the General Assembly.

What was clear from those conversations is that Illinois needs a multi-year plan for both short-term recovery and long-term resilience. It was also clear that we must address racial inequity in all of our work if we are to achieve our goal of equitable food access. This critical input informs our new Illinois Roadmap to End Hunger, which outlines an ambitious strategy to not only respond to the increased need for food assistance during the pandemic but to advance solutions that build the system better than it was before.

In the short term, Illinois can make meaningful progress against hunger by better connecting people to food programs and promoting equitable access to food. This report maps out a three-part strategy for leveraging technology, harnessing innovation, and strengthening collaboration. Through specific, actionable recommendations, we provide a roadmap for reducing hunger in Illinois.

In the long run, ending hunger requires that we address the root causes of poverty and racial inequity. Communities of color and rural communities often lack equitable access to quality education, jobs, housing, and health services. Any solution to food insecurity must also include strategies that support equitable economic outcomes. Thus, this Commission will also work with the Commission on Poverty Elimination and Economic Security to advance strategies to reduce poverty and promote economic opportunity.

Just as important as what we do is how we do it. By involving those most affected by food insecurity in meaningful ways at all stages of this process, we can better ensure that we are tackling the most important problems, implementing the most effective solutions, and evaluating the results based on real experiences.

The Illinois Commission to End Hunger is committed to working with stakeholders across the state to make the changes that are needed to reduce hunger in Illinois. This roadmap is not only a blueprint for ending hunger in our state, it is a call to action for individuals, organizations, and policymakers to work on this solvable issue. We invite all Illinoisans to join us on the journey to advance this Roadmap to End Hunger in Illinois.



Sol Flores

A handwritten signature in black ink that reads "Sol Flores".

Deputy Governor,
State of Illinois



Kate Maehr

A handwritten signature in black ink that reads "Kate Maehr".

CEO, Greater Chicago
Food Depository

WHERE WE ARE NOW AND WHY

“At one point everyone is going to need help — doesn’t matter what walk of life, you just never know when you’re going to be in that situation.”

— Zully, former client and current volunteer,
DuPage Township Food Pantry



FOOD INSECURITY IS AT HISTORIC LEVELS

Before the COVID-19 pandemic, efforts to reduce hunger had been making progress. While we still fell short of our goal to eliminate hunger, research documented an encouraging downward trend in food insecurity over the last ten years.

The pandemic and its devastating impact on our economy have reversed those positive trends. This is mostly due to record unemployment, which happened in record time.^{3,4}

In April 2020, Illinois posted its highest monthly unemployment rate since the Bureau of Labor Statistics started reporting this data.⁵

Initial unemployment claims in our state skyrocketed from 11,305 in the week ending March 14 to a peak of 202,157 the week ending April 4.⁶

It is no surprise, then, that the demand for food assistance increased sharply during the pandemic. Before COVID, over 1.6 million Illinoisans already participated in the Supplemental Nutrition Assistance Program (SNAP), the nation's largest food assistance program.⁷ During the initial months of the COVID-19

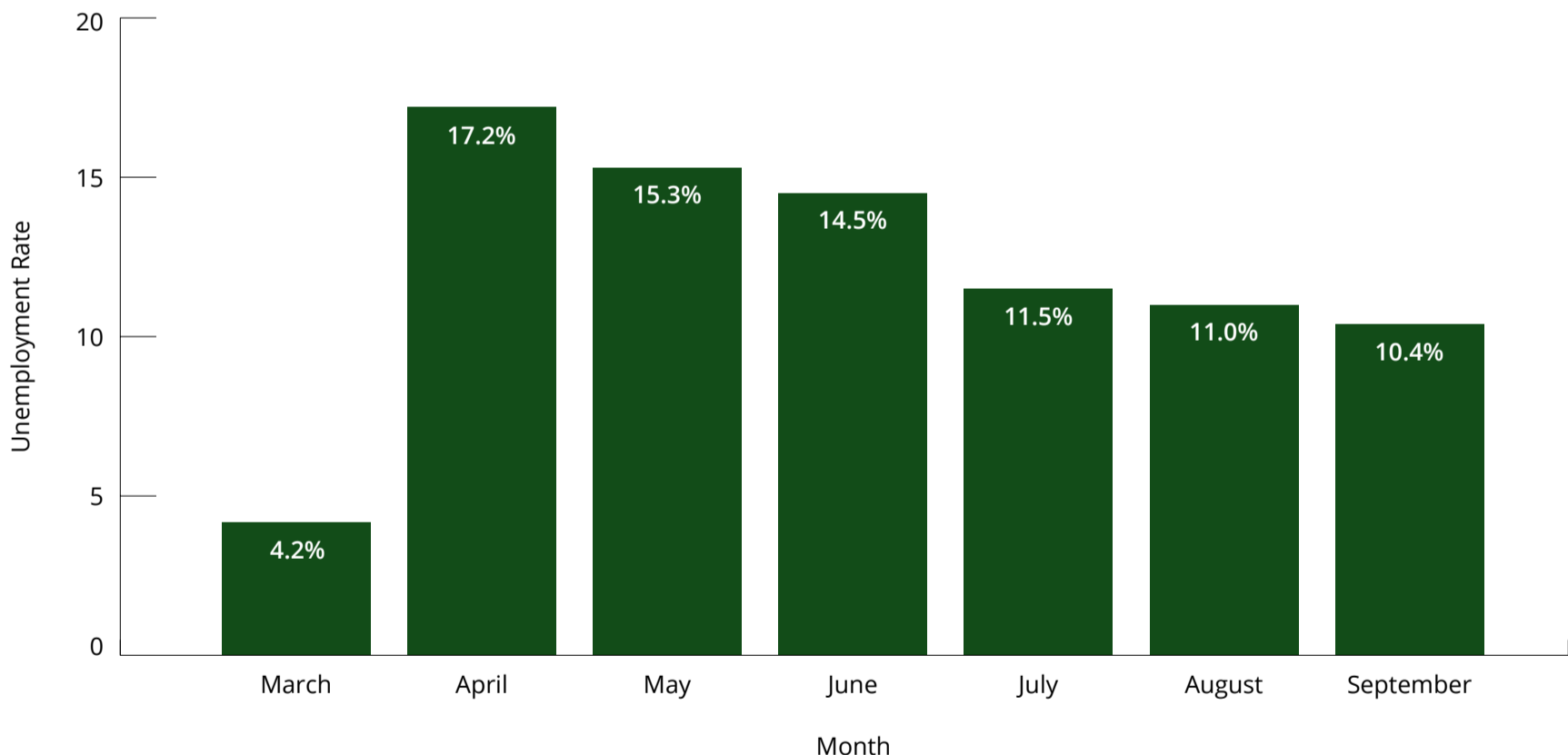
crisis, Illinois SNAP applications soared from a weekly average of under 9,000 to a peak weekly average of over 35,000.⁸

"I've never seen anything like this," said Claudia Rodriguez, senior manager of benefits outreach, who has been with the Greater Chicago Food Depository for the last nine years. For the week ending April 5, the Food Depository's benefits hotline received an unprecedented 2,275 calls — more than 10 times the number of average weekly calls before the pandemic resulted in the shuttering of businesses and schools."

Food pantries around the state also mobilized quickly to respond to COVID, but the need remains immense in many communities, including from many people who had a solid financial foundation before COVID.

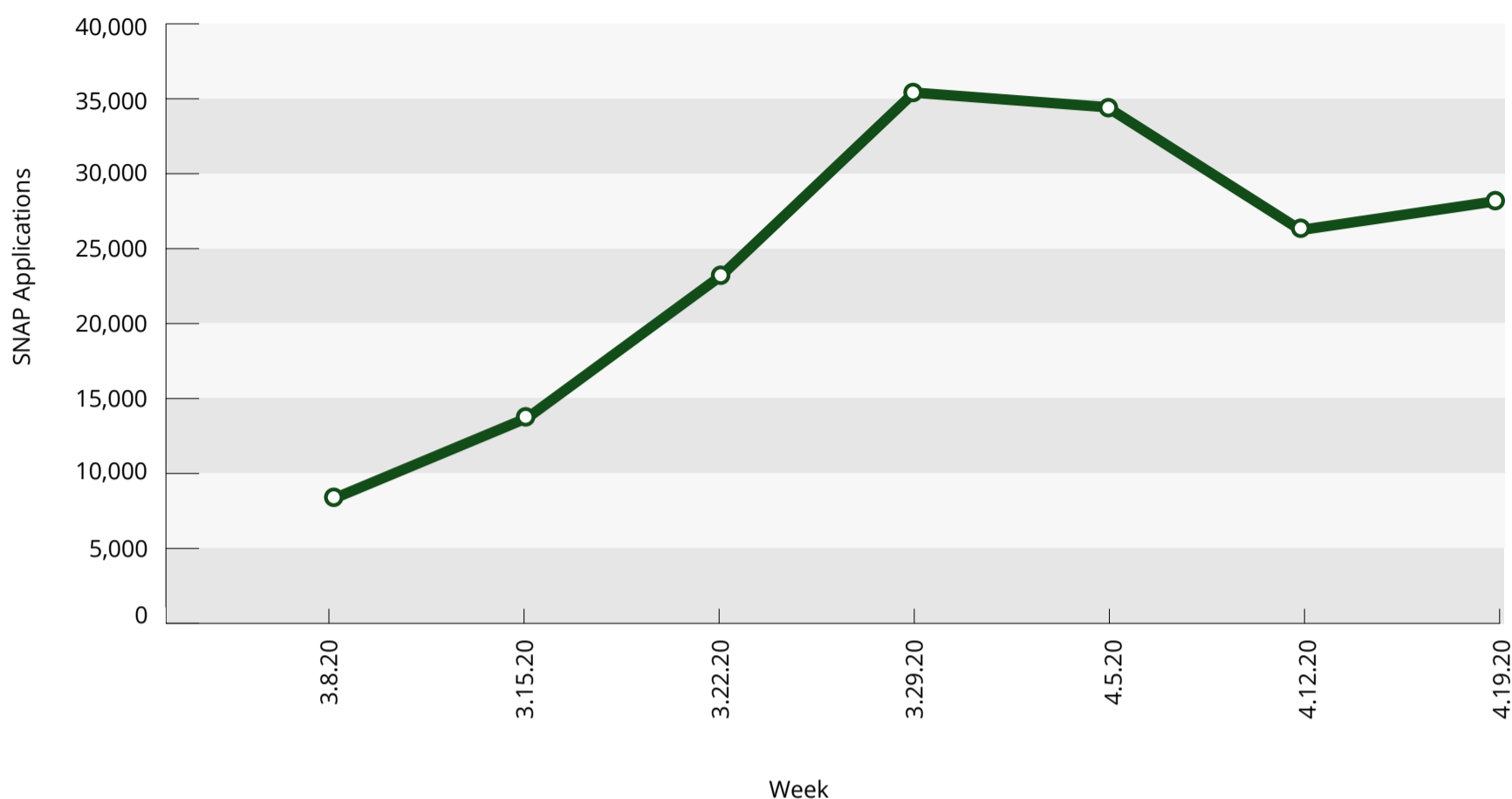
St. Louis Area Foodbank client Ann had worked for the school bus system in Illinois for 36 years. In March 2020, her world was turned upside down. "The bus company told us we were not to come to work for two weeks in March, then we got a call that we would be shut down all of April. In the meantime, when you don't work there is no check. There was the uncertainty of not having an income and we could not draw unemployment because we technically were not laid off. We were so grateful to have a resource like Soup-n-Share to be able to feed my family as well as get clothing for my grandbabies."

Figure 1. Unemployment in Illinois, 2020



US Bureau of Labor Statistics, State Employment and Unemployment Archived News Releases, March - September, State Employment and Unemployment, <https://www.bls.gov/bls/news-release/laus.htm#2020>

Figure 2. Weekly SNAP Applications in Illinois, March - April 2020



Illinois Department of Human Services, SNAP Application Daily Total Report

Even people who have kept their jobs are struggling.

For example, Ladrea Johnson of Portage Park has continued to work as a security guard to support herself and her 4-year-old son. Ladrea recently took in her younger brother and sister, which means she must make her paychecks stretch further to feed everyone. She seeks food assistance at Joined Hands, a food pantry in Portage Park on Chicago's Northwest side to help support her family throughout the pandemic. "I don't want them to worry about where the next meal is going to come from or if they're going to have support," she says.

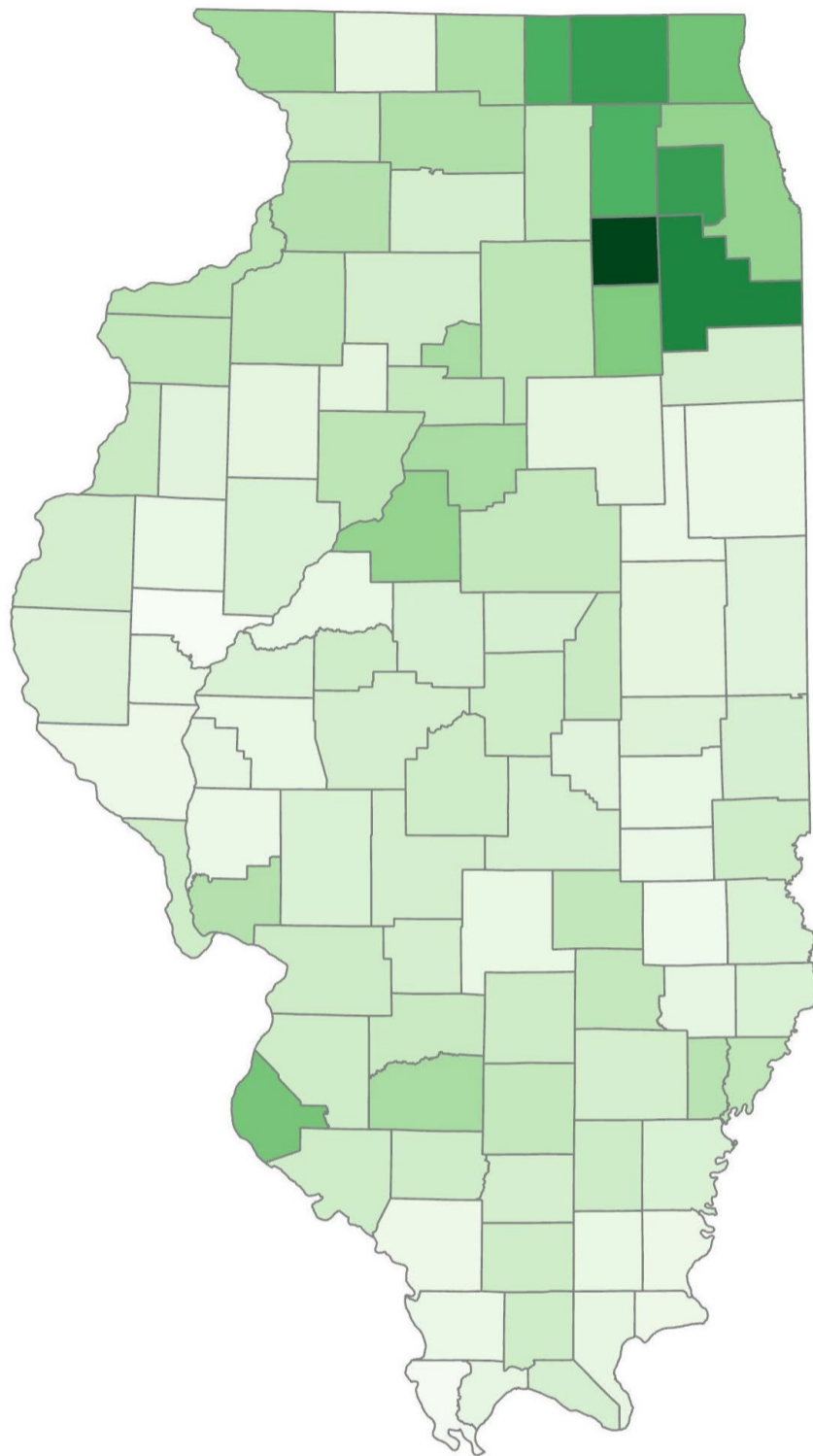
WHERE FOOD INSECURITY HITS: EVERYWHERE

No corner of the state has been left untouched by the food security impacts of COVID-19. Feeding America's Map the Meal Gap study estimates that every county in Illinois will see an increase in food insecurity of at least 22 percent in 2020.⁹ The study predicts changes in food insecurity based on projected

changes to unemployment and poverty. Alexander County, which already had the state's highest food insecurity rate, is projected to see an increase from 19.5 percent to 24.0 percent. Even the Illinois county with the lowest food insecurity rate, Kendall County, was projected to see its food insecurity rate nearly double from 4.8 percent to 9.2 percent.

A statewide analysis of SNAP benefits shows how important food assistance is to communities throughout Illinois. The Food Research and Action Center shows the percentage of residents utilizing SNAP in the five-year period ending in 2018 was highest in rural communities and small towns. In those areas, SNAP usage sits a few points above the state average as well as that of larger metropolitan areas.¹⁰ These communities also post Illinois's highest SNAP usage, jumping as high as 27 percent in rural Saline County and 20.9 percent in the small towns of Marion County, compared to the 15 percent rate in Cook County.

Figure 3. COVID-Related Projected Increase in Food Insecurity Rate in Illinois by County, 2018 to 2020



Map the Meal Gap, Projected Increase in Overall Food Insecurity (2018-2020, Illinois), Feeding America, <https://www.feedingamericaaction.org/the-impact-of-coronavirus-on-food-insecurity/>

WHO IT HITS HARDEST: PEOPLE OF COLOR, CHILDREN, OLDER ADULTS, PEOPLE WITH DISABILITIES, AND PEOPLE EXPERIENCING HOMELESSNESS

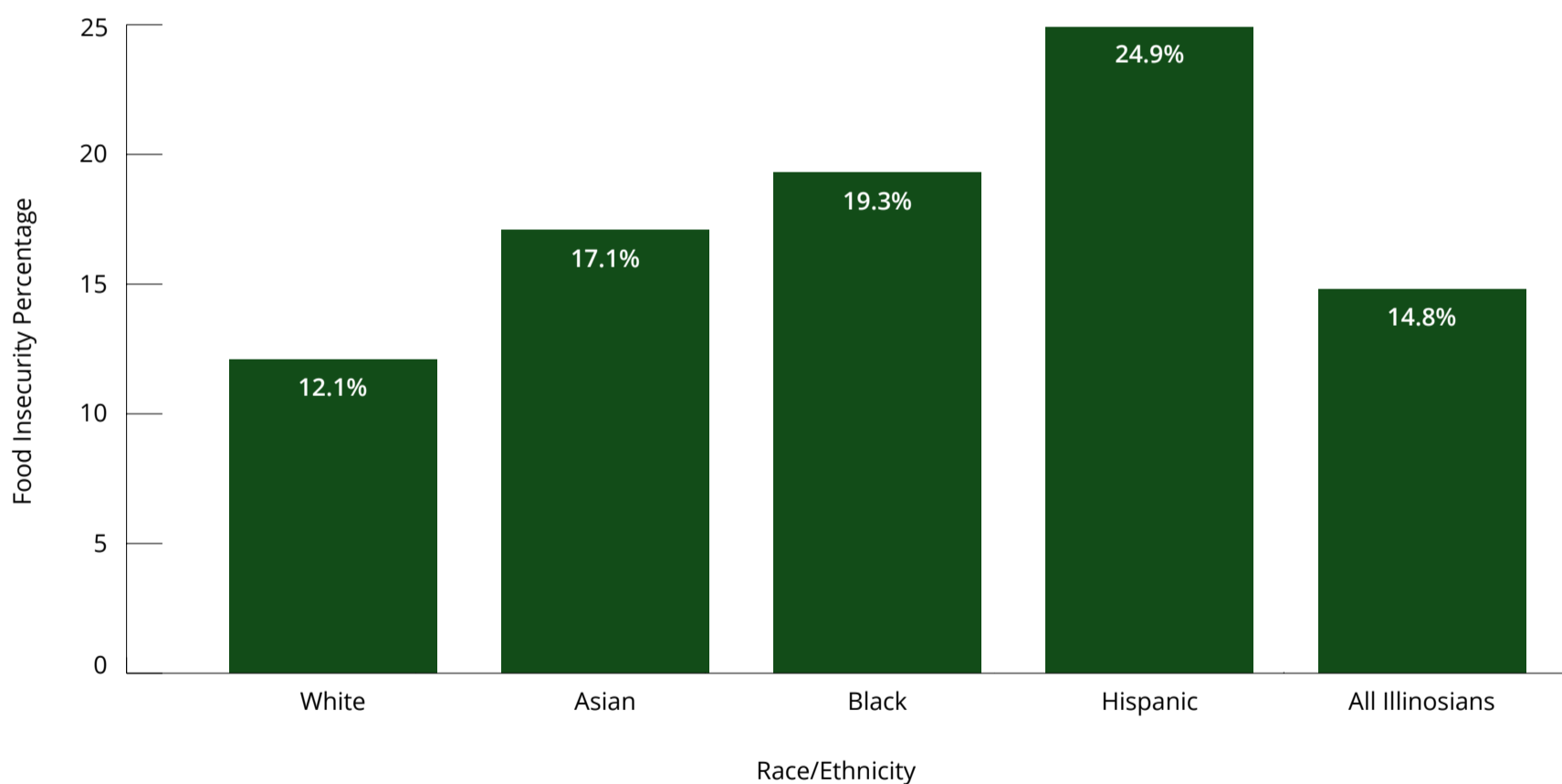
While hunger exists in every corner of the state, it does not affect all communities equally. Developmental and health outcomes, as well as other consequences of food insecurity, are disproportionately borne by people of color. Disaggregated food insecurity data by race and ethnicity show that Black and Hispanic households experience significantly higher rates of food insecurity than that of White and other non-Hispanic households.¹¹ “COVID and the recession have exacerbated existing inequalities in food insecurity,” said Diane Schanzenbach, an economist at Northwestern University.

On average, children are at greater risk of food insecurity than the overall population. Even before the COVID-19 pandemic, 12.7 percent of children across Illinois were food insecure, impacting 363,900 children.¹² During the pandemic, child food insecurity has skyrocketed. In April 2020, research found that food insecurity doubled

for the population overall but tripled among households with children.¹³ Hunger, especially when experienced in the early years, can have negative impacts on health, cognitive development, and educational attainment.¹⁴ Summer is an especially concerning time for child hunger, as many children do not have access to free and reduced-priced meals offered at school.

Before the pandemic, 8.6 percent of Illinois seniors were food insecure.¹⁵ Research found a nearly 60 percent increase in older adult food insecurity during COVID-19.¹⁶ Black and Hispanic older adults have disproportionately experienced higher levels of food insecurity during COVID-19, exacerbating prior rates of disproportionate food insecurity levels. As older adults make up a growing proportion of the population, senior hunger is expected to grow. For older adults, the consequences of hunger can be much more severe because of the impact of nutrition on diet-related disease and health management.

Figure 4. Food Insecurity in Illinois by Race and Ethnicity, November 2020



Schanzenbach, D. & Tomeh, N. November 23, 2020, Visualizing Food Insecurity Weekly Food Insecurity During COVID-19 Graph

Mary Amos turns to several nutrition programs to make ends meet. Her SNAP benefits are only \$16 per month, so she also gets Meals on Wheels and visits an older adult market in Chicago. Mary tries to adhere to a strict diet because of stomach issues, but the foods she needs aren't always affordable. "Sometimes I eat what I shouldn't because it is all I have and it upsets my stomach," she said, "but sometimes when you got to eat, you got to eat."

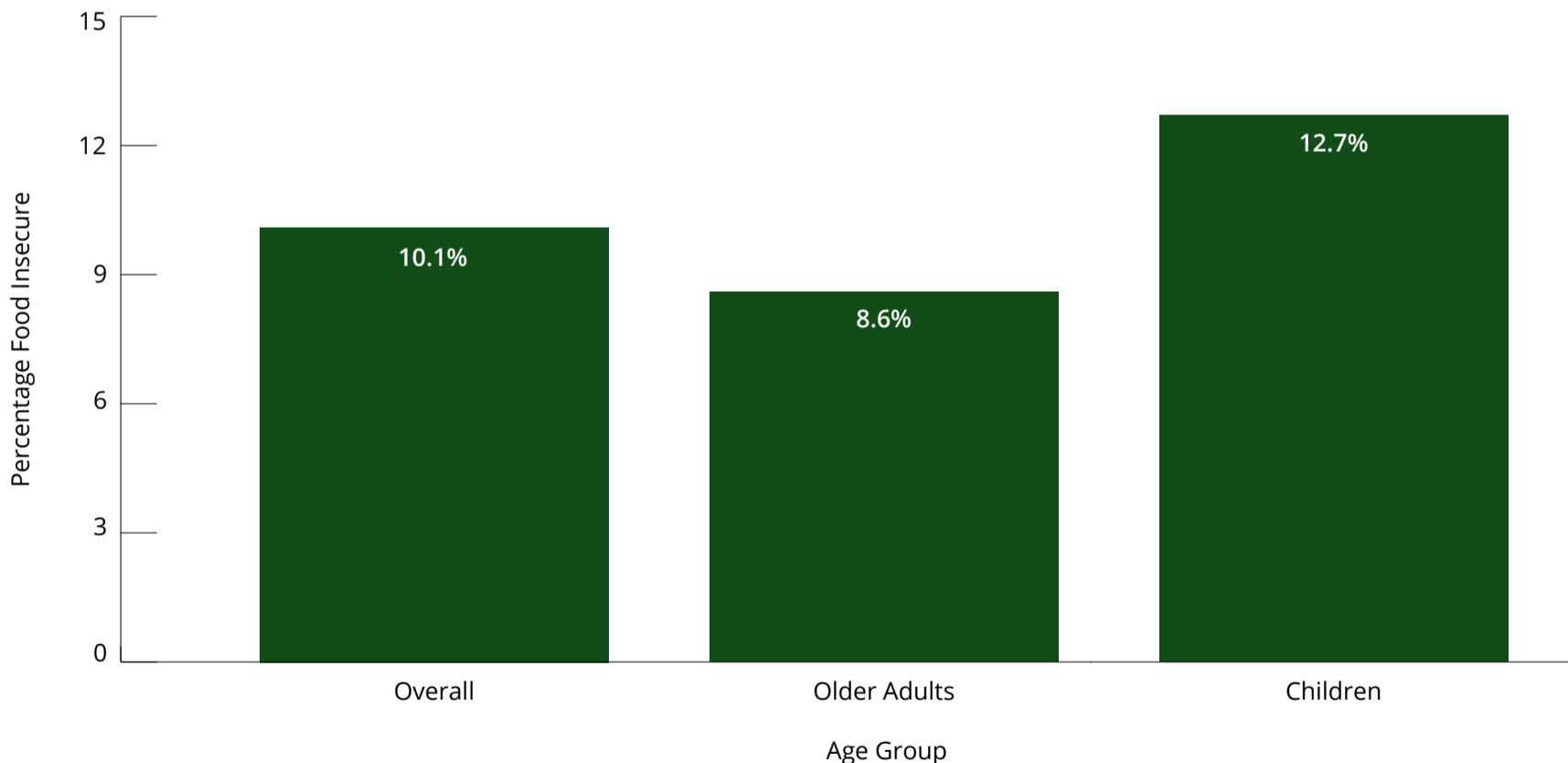
Disability is another important risk factor for food insecurity. Having a disability increases the likelihood of food insecurity due to both increased household expenses as well as reduced earnings. Based on 2015 U.S. Census Current Population Survey data, an estimated 31 percent of households with a working-age member with a disability in the Chicago metro area are food insecure, compared to 8 percent of households with a working-age adult with no disabilities.¹⁷ Low-income adults with disabilities face many obstacles in getting healthy diets, and current supports are not sufficient to provide for adequate nutrition. Barriers include inadequate financial resources to cover the full cost of living, lack of affordable and accessible transportation to get groceries home, difficulty accessing food assistance programs, difficulty obtaining

food appropriate for special diets required by their medical conditions, and more.

For Western Illinois resident Joe and his family of four, an unexpected disability changed their lives. Joe had a great construction job and made good money. Then Joe got in a car accident and suffered lasting mobility problems. He lost his job, too. Although his wife Jane works, the combination of medical bills and reduced income means the family often decides between paying bills and buying enough food to eat.

Finally, people experiencing homelessness and the housing insecure are at higher risk of hunger. Hunger both precedes and accompanies homelessness. People who are forced to decide between paying for housing or groceries will often dip into their food budget in order to maintain shelter. African Americans accounted for 40 percent of all people experiencing homelessness in 2019, despite being 13 percent of the U.S. population.¹⁸ COVID has only increased housing insecurity and the resulting trade-offs between food and shelter. Research by The Aspen Institute suggests that half a million renters in Illinois will be at risk of eviction due to COVID-19 once the state's eviction moratorium is lifted.¹⁹

Figure 5. Food Insecurity in Illinois by Age, 2018



Overall & Children: Feeding America, Map the Meal Gap 2020, <https://map.feedingamerica.org/county/2018/overall/illinois> Seniors: Feeding America, The State of Senior Hunger in America in 2018, Table 3, <https://www.feedingamerica.org/sites/default/files/2020-05/2020-The%20State%20of%20Senior%20Hunger%20in%202018.pdf>.

AT THE ROOT: POVERTY AND RACIAL INEQUITY

The reasons individuals and families struggle with hunger are complex and involve multiple social and structural risk factors, including race and ethnicity, age, household composition, and disability, as well as high cost of living and affordable housing.

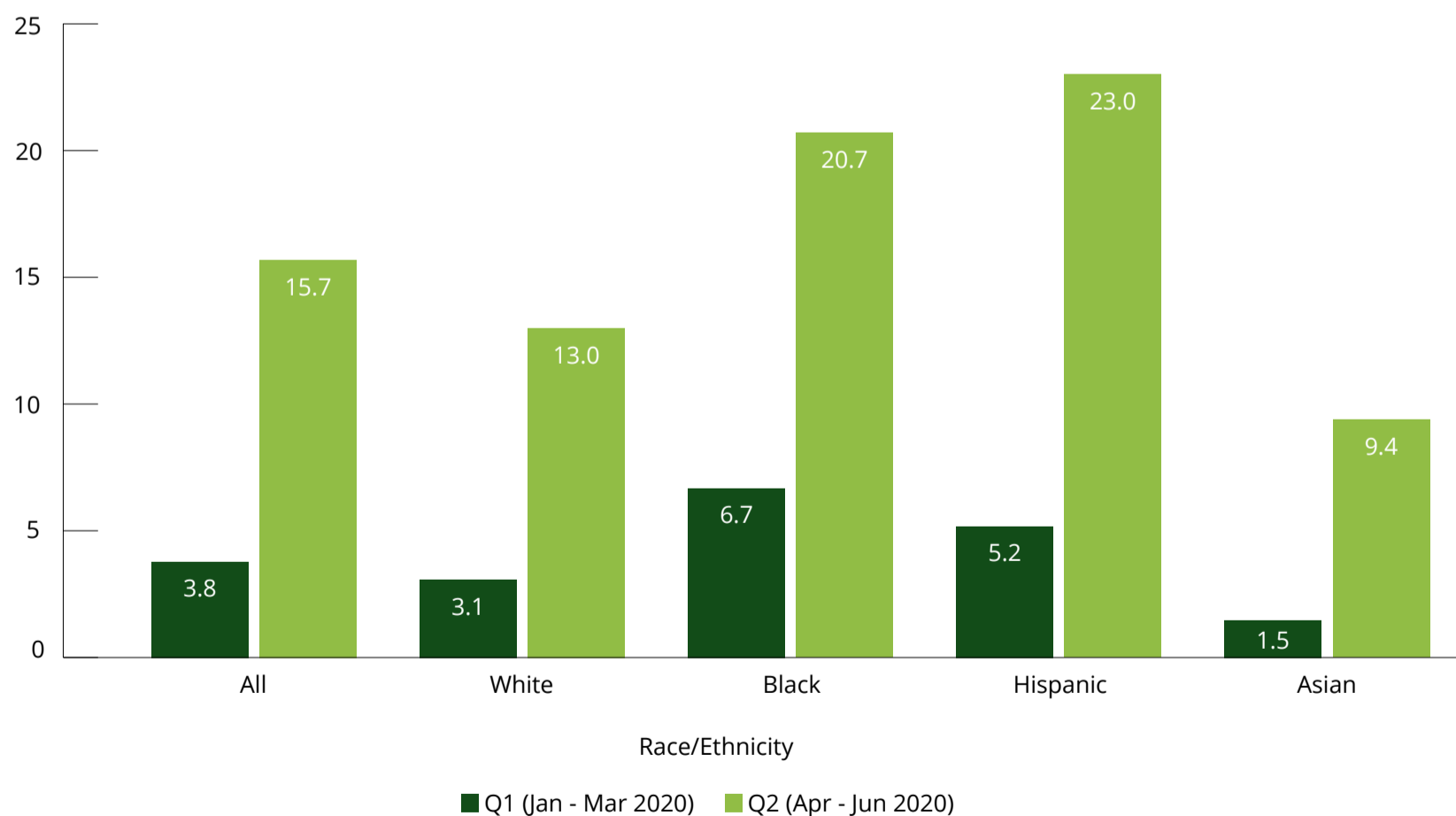
For many families, hunger is caused by poverty that results from a lack of employment or because jobs pay too little. For other families, jobs may be available but unattainable. For example, a parent may not be able to take a job or work enough hours because they lack affordable childcare options. The end result of inadequate employment and wages is poverty and a lack of resources. Families that struggle to make ends meet are often forced to make tradeoffs between food and other expenses. All too often they dip into their food budget to stretch their resources in other areas. For example, a lack of health insurance to cover medical care or unexpected expenses like car repairs can create a crisis for a family living paycheck-to-paycheck.

A lack of jobs — particularly jobs that pay a living wage and provide benefits — was an issue even before the pandemic.²⁰ This is true in both urban and rural communities.²¹ In 2018, 12.1 percent of people in Illinois lived in poverty, defined as \$21,720 for a household of three for 2020.²² Even before the pandemic decimated our economy, 29.0 percent of all workers in this state were paid less than \$12 per hour.²³

Hunger is not limited to families living in poverty. People earning above the official poverty line often still struggle to choose between food and other basic needs. In fact, 30 percent of those experiencing hunger in Illinois earn too much income to qualify for nutrition assistance programs but still struggle to put food on the table.²⁴ In Illinois, 36 percent of households earn incomes below the cost of living, indicating that they make tradeoff decisions, many likely related to food that impact their food security.²⁵

The pandemic worsened the situation around jobs, and communities of color have been hit the hardest. Even before COVID-19, African-Americans had unemployment rates that were double that of the rate for whites. In Illinois in 2019, the unemployment rate was 7.9 percent for African-Americans, 3.9 percent for Hispanics of any race, and 3.1 percent for whites.²⁶ During COVID, more than 20 percent of Black and Hispanic women in Illinois lost their jobs.²⁷ Even as the unemployment rate starts to recover, the recovery has been faster for white workers than Black, Hispanic, or Asian workers. This is consistent with recovery from past economic downturns like the Great Recession. These economic disparities contribute to higher rates of poverty and food insecurity among Black and Hispanic people. Black and Hispanic households have roughly double the rate of food insecurity than that of White and other non-Hispanic households.²⁸

Figure 6. Illinois Unemployment Rates by Race and Ethnicity, 2020 Q1 and Q2



Economic Policy Institute analysis of Bureau of Labor Statistics Local Area Unemployment Statistics (LAUS) data and Current Population Survey (CPS) data.

Food insecurity is one of many consequences of systemic racial inequities in our country. The higher rates of unemployment, poverty, and food insecurity among Black and Hispanic people are due in part to the impact of structural racism, including racially biased public policies, institutions, practices, and cultural beliefs and attitudes that systematically discriminate against people of color.²⁹ As a result, people of color have disproportionately limited access to good paying jobs, affordable, quality health care, and quality education, further contributing to the conditions that foster poverty and all its consequences, including food insecurity.^{30, 31}

The COVID-19 pandemic has added a deadly layer of inequity to these systemic failures. Black and Hispanic communities make up a disproportionate number of deaths from the COVID-19 pandemic because they lack equitable access to quality healthcare; have higher rates of chronic disease; and are more likely to be front-line workers, live in crowded conditions, and distrust the healthcare system. The 10 hardest-hit zip codes in Illinois are majority Black or Hispanic.³² While 14.6 percent of Illinois residents are Black and 17.5 percent of Illinois residents are Hispanic, as of August 2020, 26.9 percent of deaths due to COVID-19 were Black residents and 20.5 percent were Hispanic residents.³³ In Chicago, more than 70 percent of the early COVID related deaths were among Black people.³⁴

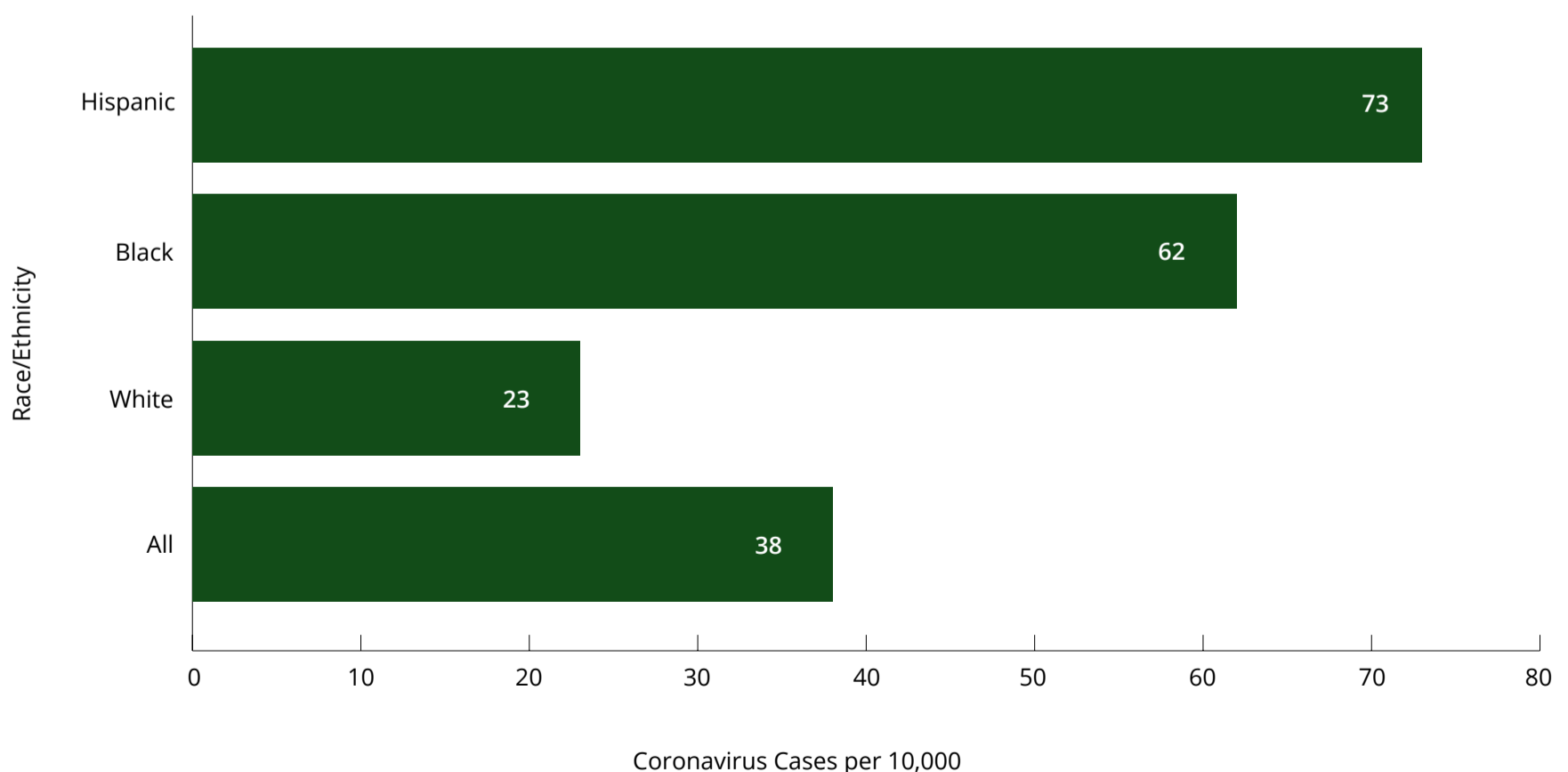
The summer of 2020's racial justice reckoning laid bare the disparities that have existed for decades. The protests that erupted throughout the state and around the country this

summer were triggered by the killing of Black men and women at the hands of police, but the outrage encompassed all the ways in which people of color are systematically shortchanged — from unemployment to COVID to food insecurity.

Rev. Sandra Gillespie has fed countless people from her food pantry at the Chosen Tabernacle Church in the Bronzeville neighborhood on Chicago's South Side. She remains determined as her community struggles with the added burden of COVID-19. "When you think about food justice and racial injustice, all those things tie together," she said. "The anger. The frustration. The inequalities. They all tie together. Now we have the bigger contingent of people who are hungry and who are trying to feed their kids. So I'm just more determined."

To end hunger and food insecurity in Illinois, we must apply a racial equity lens to causes and solutions. Equity is a state in which all people in a given society share equal rights, access, opportunities, and outcomes that are not predicted or influenced by their identity characteristics, including race, gender, class, or geographic location. In the context of nutrition, achieving racial equity means that people of color are no longer more likely to be food insecure than whites and can reach optimal nutritional outcomes. In practice, because hunger is a consequence of poverty and inadequate economic opportunity, achieving racial equity in food security also demands that we address the intersection between race, poverty, and economic opportunity.

Figure 7. U.S. Coronavirus Cases by Race and Ethnicity, July 2020 (per 10,000 people)



Oppel, Richard A., et al. "The Fullest Look Yet at the Racial Inequity of Coronavirus." The New York Times, The New York Times, 5 July 2020, www.nytimes.com/interactive/2020/07/05/us/coronavirus-latinos-african-americans-cdc-data.html.

In a world where poverty, food insecurity, and racial inequity are so tightly intertwined, our efforts to reduce hunger must put the needs of communities of color at the center of this work. Equity-centered approaches move people toward equality by providing targeted, equitable support based on circumstances or need.

THE CONSEQUENCES OF FOOD INSECURITY: MORE INEQUITY

The consequences of hunger are far reaching. Hunger is inextricably linked with health and mental health, as well as educational outcomes.

There is a strong connection between hunger and chronic diseases like high blood pressure, heart disease, and diabetes.³⁵ People experiencing hunger face a constant worrying about where their next meal will come from. The resulting stress can cause mental health problems such as depression and anxiety.³⁶ Food insecure mothers had 2.2 times higher rates of mental health issues than food secure mothers.³⁷

Hunger is associated with a host of negative impacts on child well-being. Being hungry makes it hard for children to concentrate in school and decreasing their ability to perform well in school.^{38, 39, 40, 41} Hunger also increases behavioral problems in youth, as well as increased tardiness and absenteeism.^{42, 43} In fact, 50 percent of children facing hunger will need to repeat a grade.⁴⁴

Diane Schanzenbach, a Northwestern University economist who studies policies aimed at improving the lives of children in poverty, underscored the negative consequences of child hunger. “Research is increasingly demonstrating the long-term harm when children experience even short spells of hunger. As a result, it is extremely important to shield children from hunger and food insecurity.”

Because food insecurity is disproportionately experienced by people of color, communities of color disproportionately bear the consequences. Likewise, when Black and Hispanic

communities lack equitable access to quality healthcare, including mental health services, or high-performing schools, they are poorly positioned to overcome the ill-effects of hunger and poverty.

The impacts of hunger are complex and far-reaching. Fortunately, the solution to hunger is far less complicated. The fastest and most direct way to reduce hunger in Illinois is to better connect people to nutrition assistance programs.

Craig Gundersen, a University of Illinois economist, stressed the critical importance of the Supplemental Nutrition Assistance Program (SNAP) in alleviating food insecurity. Gundersen says: “Food insecurity is now recognized as the leading nutrition-related public health crisis in the U.S. By expanding benefits and expanding eligibility, we can reduce food insecurity in our country and the resulting negative health consequences.”

COVID IMPACT: CHILDREN

COVID IMPACT

Children face an increased risk of food insecurity when school is not in session. Although local school districts worked hard during the COVID-19 pandemic to offer meals-to-go, tens of thousands of families with children have been affected by sudden job losses, reduced job hours, and limited access to transportation. Early in the pandemic, food insecurity doubled for the population overall but tripled among households with children.⁴⁵

COVID POLICY RECOMMENDATION

Provide take-home meals; increase access to summer and afterschool meal sites; leverage federal policy waivers to make it easier to apply for and maintain nutrition assistance program benefits, provide Pandemic-EBT for days children lack access to an in-school meal.

CLIENT STORY

With the COVID-19 pandemic closing schools across the city, children with parents still working outside of the home needed somewhere to go during the day and complete their online coursework. The Barreto Union League Boys and Girls Club in the Humboldt Park neighborhood of Chicago has become a remote learning hub, offering makeshift classrooms to 90 students ranging from first grade to high school seniors. Jacob Bowers, whose parents both work, now attends school virtually from the Barreto Club. In addition to a safe, socially distanced space, these students also receive nutritious meals throughout the day to nourish their bodies and minds. “We’re safe here, too. We get to have fun. Even though we have to social distance, I still get to be around people,” said Jacob.

Photo: Jacob Bowers



WHERE WE'RE HEADED

“I think that for our families, it takes the stress off them to know where their next meal will come from, because they know at least three days a week, they can count on the club to provide lunch and a variety of food boxes.”

— Boys and Girls Clubs CEO and Executive Director
Tiffany Mathis



We envision an Illinois where no one is without food — where all children have access to nutritious, appealing meals at school and at home, and where families in every rural and urban community have access to quality, affordable food. We envision an Illinois where people do not have to choose between paying a medical bill or putting food on the table, and where limited mobility doesn't prevent older adults or people with disabilities from having a nutritious meal. We envision an Illinois where the color of your skin, your citizenship status, or the zip code where you live do not make you more or less likely to be food insecure.

The programs we need to achieve this vision already exist today. The challenge is that we have not fully unlocked their potential for reducing food insecurity.

The fastest and most direct way to alleviate hunger is through the emergency food system and federal nutrition assistance programs. Through food banks, pantries, shelters, and soup kitchens, the emergency food system provides groceries and meals to people in need. Federal nutrition programs like SNAP and WIC provide groceries to low-income people, and programs targeting children and seniors provide nutritious meals and snacks in a variety of settings. Several federal nutrition programs — including SNAP and meal programs for children — are entitlement programs, meaning they are funded to serve all who are eligible. All we have to do is enroll all who are eligible, and these programs will grow to meet the need.

Unfortunately, many people who need food assistance do not utilize available programs. Some may not be aware that they

are eligible or know how or be afraid to sign up; others face barriers to enrollment, or a program does not operate in their community.

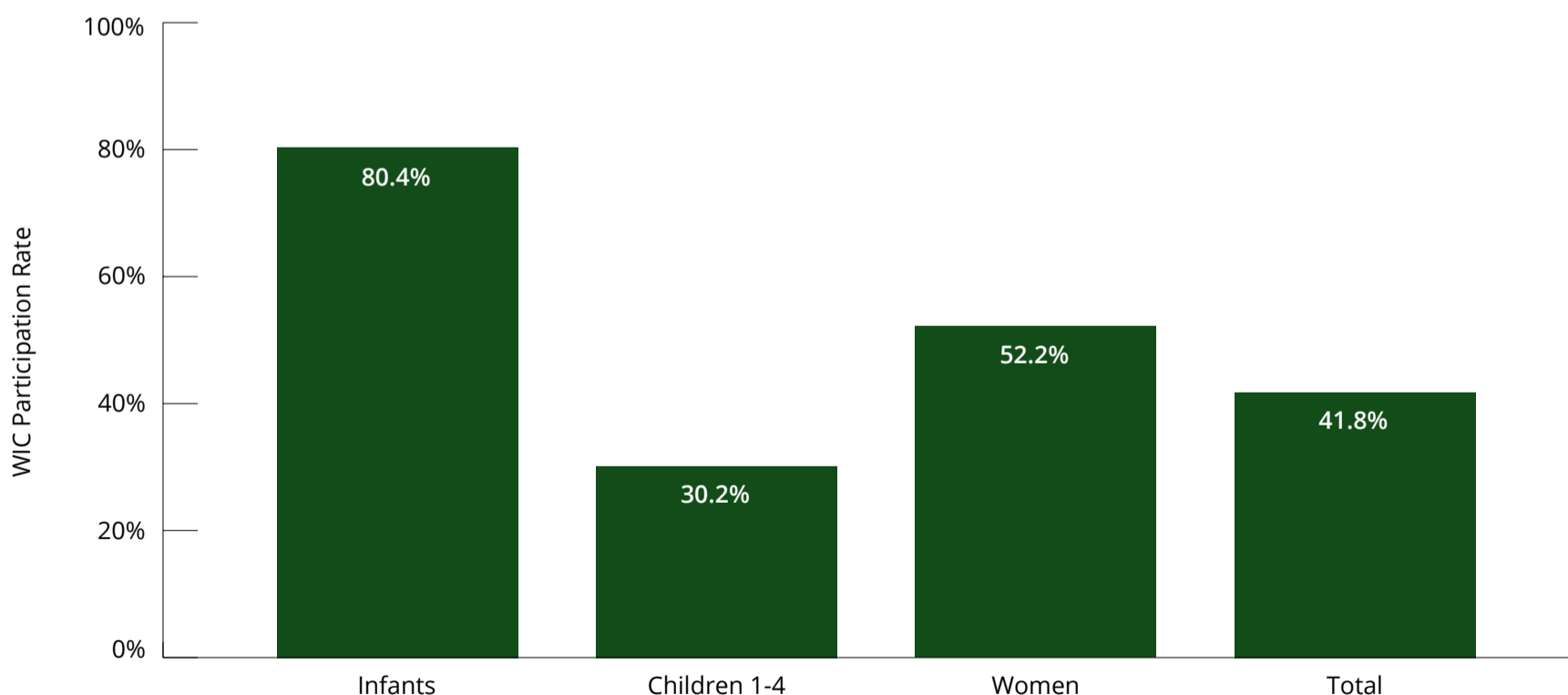
Underutilization of federal nutrition programs leaves federal dollars on the table that could be used to support families struggling to make ends meet. It also leaves dollars on the table that could be invested in local communities. Underresourced families and communities are more likely to require state and local programs and funding support. At a time when Illinois's state and local budgets are decimated due to the economic impacts of the pandemic, it is critical that we draw down all available federal resources to help families and communities thrive. Yet based on current participation rates and utilizing U.S. Department of Agriculture administrative data, we estimate that each year Illinois leaves over a billion dollars on the table: \$876 million in SNAP benefits, \$200 million in WIC benefits, and nearly \$73 million in school breakfast benefits.

If we want to better connect people with food and nutrition programs, we need to advance strategies that expand program awareness, remove enrollment barriers, and increase food access, particularly access to nutritious and healthy foods.

EXPANDING PROGRAM AWARENESS: PEOPLE CAN'T USE PROGRAMS THEY DON'T KNOW ABOUT

If more people know what nutrition programs are available to them, the programs will better reach those in need of food assistance.

Figure 8. WIC Participation Rate in Illinois by Age, 2017



United States Department of Agriculture, National and State-Level Estimates of WIC Eligibility and WIC Program Reach in 2017 Final Report: Volume 1; December 2019, Table 4.6, <https://fns-prod.azureedge.net/sites/default/files/resource-files/WICEligibles2017-Volume1.pdf>

The St. Louis Area Food Bank shared the story of a woman living in Williamson County in Southern Illinois. She and her husband were living off less than \$600 a month from disability benefits. At the age of 64, she was unable to continue working in construction and could not find other work. She and her husband were only eating three meals a week because their money was needed to pay their utility bill and medical expenses. The women and her husband did not know what emergency programs were available to assist them in their rural community. With the help of the St. Louis Area Food Bank, they were able to get the food they needed and were also connected to other resources, such as Social Security, Temporary Cash Programs, LIHEAP Energy Assistance, SNAP, and the CSFP Senior Box Program. These programs allowed the family to stop having to choose between having enough to eat and paying for their other expenses.

This example illustrates how many people in need of food assistance are not aware of the help available to them. By making sure that people who are food insecure are aware of what nutrition programs exist, who is eligible, and how to enroll, we can better leverage these resources to end hunger.

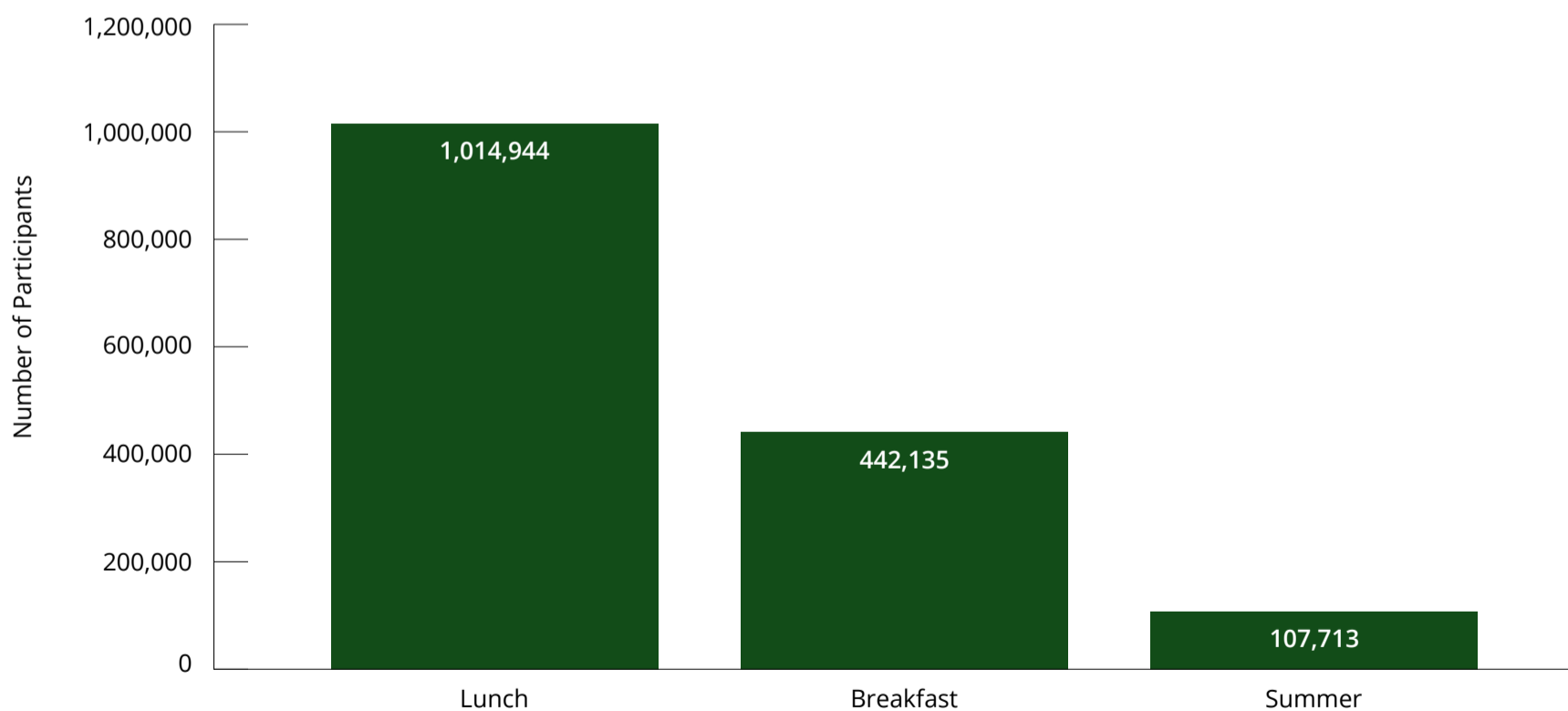
For example, the WIC program has far more capacity to help Illinois residents. In 2017, the participation rate in WIC was only 41.8 percent of those eligible.⁴⁶ Infants have the highest WIC participation rates, but the program could do much more to reduce hunger and improve nutrition if we connected

more children up to four years old with the program.⁴⁷ By better leveraging organizations already serving families with young children in educational and health care settings to help promote awareness about the important nutritional supports that WIC provides, we could better connect eligible people with the program.

In addition to increasing awareness about underutilized programs, we can conduct outreach to communities that are more likely to be disconnected from nutrition assistance programs, such as immigrant and noncitizen households. Many people in need of food assistance decide not to participate because they're worried it may affect their future immigration status. To effectively reach immigrant and noncitizen households, it is just as important who is sharing informational materials as what information is shared. Trusted community partners can lead educational workshops or distribute information to inform communities about what programs are available.

People who are newly in need of food assistance are least likely to know what programs they are eligible for or where to go to get help. For many people, the first place they turn is to a place of worship or online search. This is why it is so important that informational materials are shared in the places where people receive information, including through trusted community partners or social media.

Figure 9. Child Nutrition Program Participation in Illinois, FY2019



USDA, Child Nutrition Tables, State Level Tables: FY2015 - 2019, Illinois. <https://www.fns.usda.gov/pd/child-nutrition-tables>

REMOVING BARRIERS: HELPING PEOPLE NAVIGATE FOOD PROGRAMS

Knowing what programs are available is an important first step to connecting with benefits, but some people face additional barriers to enrollment. For example, college students and able-bodied adults without dependents both face additional educational or work requirements in order to qualify for programs and may need help navigating complicated eligibility rules. Older adults, people with disabilities, and people with mobility barriers may have difficulty traveling to a public aid office to complete an application. For others, the stigma associated accessing available programs can be a barrier, making it hard to ask for help. Community-based organizations working in partnership with government agencies can help people complete the application process at neighborhood locations that are easier to access with limited mobility and that feel less stigmatized.

“There are a number of factors that can make it difficult for eligible clients to receive SNAP benefits,” said Christina Obregon, who helps clients complete applications for SNAP. “The application itself is 18 pages of small print that can be very hard to fully comprehend. It is difficult for many people to understand whether or not they are eligible for assistance programs. And the IDHS offices can only provide so much technical support given the number of applicants.”

Lengthy wait times to speak with a representative by phone or at a public aid office can pose another barrier to enrollment. During the pandemic, hold times may be longer than usual as caseworkers field a higher volume of calls. Concerns about social distancing may deter some people from applying in person at a public aid office. While Illinoisans have the option to apply for SNAP by phone or online, applications for WIC must be completed entirely in person. At the same time, many low-income households have limited access to a home computer or home internet service, so they may not be able to take advantage of online enrollment.

Low-income populations often face housing insecurity in addition to food insecurity, posing another barrier for people seeking to maintain their benefits. When they move, they may not receive notices by mail about the need to complete a renewal or submit required documents. While Illinois provides an online portal for SNAP participants to manage their application and recertification process, WIC does not. And again, the lack of home computers and internet service further limit access to online options, even when this is an option.

INCREASING FOOD ACCESS: CONNECTING COMMUNITIES WITH FOOD RETAIL AND NUTRITION PROGRAMS

In both rural and urban settings, some people simply are not close to where food can be accessed, whether that is a grocery store, food pantry, summer meal site for children, or meal program for older adults.

In some cases, the issue is that a nutrition assistance program does not operate in a community where there is need. Nationally, for every 100 school lunch programs, there are only 78 breakfast sites and just 47 summer food sites.⁴⁸ While participation is driven by multiple factors, it is striking that far fewer children receive breakfast or summer meals than receive lunch during the school year. In FY2019, only 57 percent of the children who received food assistance at lunch also received food assistance at breakfast, and just 12 percent received summer food.⁴⁹

In other cases, a community may lack the population density or income profile to sustain food retail or food programming. People living in rural communities are often spread out, making it difficult to support a traditional grocery store, food pantry, or summer feeding program. As a result, they have to travel longer distances to get to a store, pantry, or food program, creating an additional burden for those with already limited resources.

In urban areas, the concentration of low-income households in a community may be either too high or too low to support a traditional grocery store or meal program. Traditional grocers operate on thin margins, and stores may not remain profitable enough to stay open if they primarily serve clientele who purchase high-value foods rather than luxury food products with higher profit margins. Summer feeding guidelines limit sites to communities with a high percentage of low-income children, meaning that low-income children living in middle- or high-income communities are less likely to have access to a summer food program.

Residents of Altgeld Gardens on the South Side of Chicago experience many issues of limited food access. Although there is a grocery store a half mile away from the community, Altgeld Gardens resident Janine Purvis said: “There are also a lot of people living on fixed income, on food stamps, on a budget. They can’t afford it.” Aseneth Edwards, another Altgeld Gardens resident takes the bus every week almost 50 blocks to go to an affordable grocery store. The transportation costs add up.

Rural communities face the additional challenge of limited public transportation infrastructure. While urban areas have more public transit options, transit systems may not connect all communities to food retail or food programs. Public transit may also require additional time or expense to navigate.

Food access also means making grocery stores, food pantries, and meal programs accessible to people with limited mobility. For a person with a disability that requires use of a wheelchair or an older adult who utilizes a walker, a food program or grocery store that is not ramp accessible and doesn’t have programming that fits their needs won’t be very helpful, even if the location is down the street.

IMPROVING NUTRITION: NOT JUST FOOD, BUT HEALTHFUL FOOD

Feeding people facing hunger is about more than simply providing food. It’s about providing nutrition, nourishment,

and wellness. It is important to connect people with the most nutritious food possible to support their health and well-being.

Unfortunately, nutrition-related illnesses disproportionately affect food-insecure people. When people do not have enough food to eat or have to choose inexpensive foods with low-nutritional value, it can negatively impact their health. Especially for older adults, a nutritious diet complements medication and helps them manage disease. Likewise, nutrition is of extra importance for children. A healthful, balanced diet is essential for supporting cognitive and physical development and for succeeding in school.

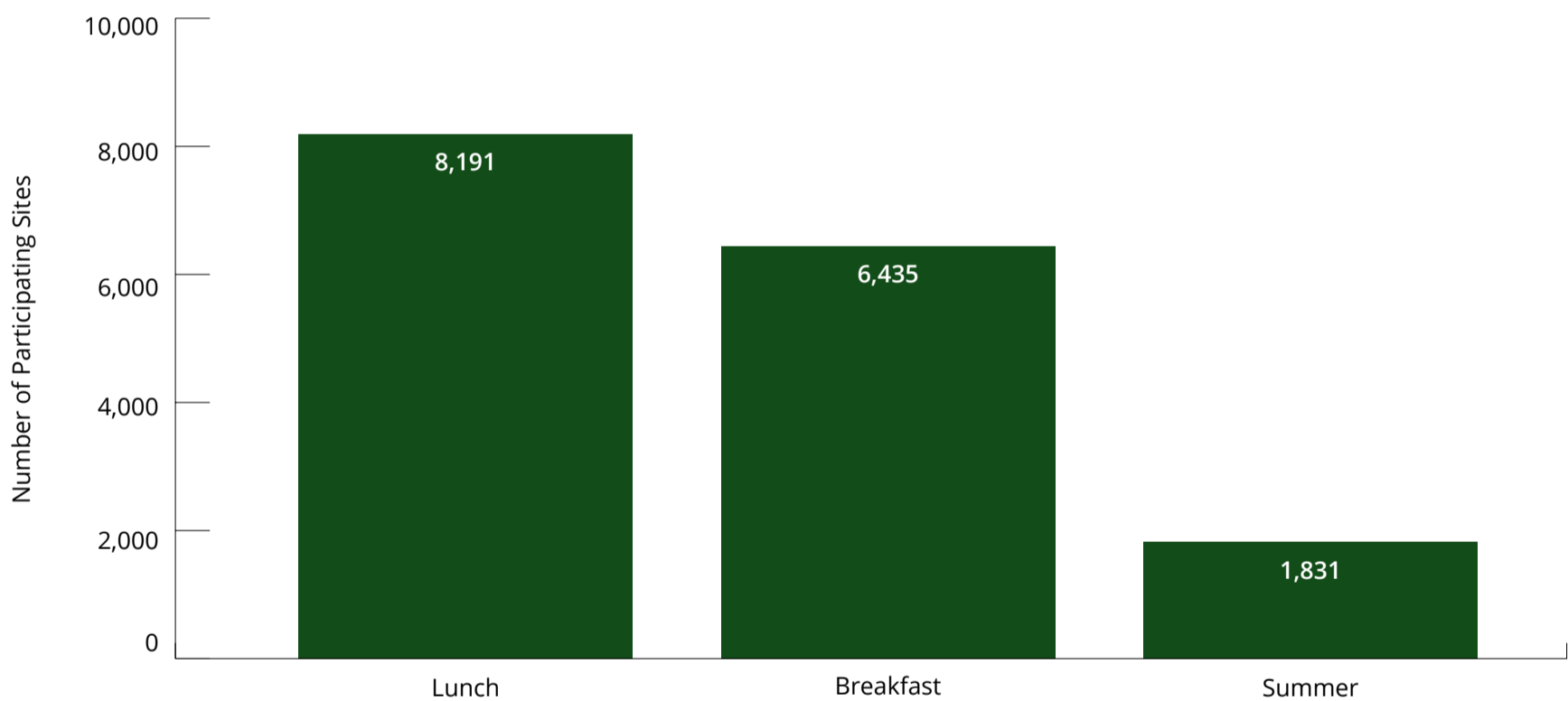
Lorie, who cares for her grandson Camden, shared the importance of having access to nutritious food at a visit to the Richland Bridge Food Pantry in Chillicothe. On the day her story was documented by pantry staff, she waited until the camera was put away to tearfully confide that her family was there that

day because all they had at home was a bag of frozen French fries in the freezer and no money for groceries.

We must strive to improve access to healthy food in all Illinois communities. This means stocking stores and food pantries with fruits, vegetables, whole grains, low-fat dairy and lean proteins. It means providing meals and snacks that are nutritionally balanced and fresh. It also means providing foods that are culturally appropriate.

Sourcing and distributing nutritious food is essential to meeting the needs of food insecure families. Encouraging existing retail outlets to stock more fresh, nutritious food can increase people's access to healthy food. Investing in cold storage increases the capacity of retailers, pantries, and food programs to be able to store and distribute fresh produce and other perishable foods. We can also support nontraditional retail, like farmers' markets and urban agriculture and share information about nutrition education, cooking skills, and food budgeting.

Figure 10. Child Nutrition Program Sites in Illinois, FY2019



Illinois State Board of Education, Child Nutrition Data Analytics and Mapping Tools, December 3, 2020. <https://www.isbe.net/Pages/Nutrition-Data-Analytics-Maps.aspx>

COVID IMPACT: OLDER ADULTS

COVID IMPACT

Older adults are at greater health risk from COVID-19. As a result, they face the most severe and longest social distancing disruptions. Concerns about social distancing have made some people reluctant to utilize public transportation, particularly health-compromised people, further exacerbating transportation and access barriers. Special considerations are required to make sure older adults are able to access adequate food in the safest way possible. Older adults experienced a nearly 60 percent increase in food insecurity during COVID-19.⁵⁰

COVID POLICY RECOMMENDATION

Provide shopping assistance; utilize flexible distribution methods such as take-home meals, home-delivered meals, grocery delivery, curbside food pantries, or food pantry delivery; senior-only shopping hours.

CLIENT STORY

On a Wednesday evening during COVID at the Allen Metropolitan Christian Methodist Episcopal Church in Roseland, Juanita Foster, 67, was one of a handful of volunteers picking up home-cooked dinners to deliver to the older adults on their blocks. The church, which has run a weekly hot meal program for more than a year, has devised creative solutions to continue feeding their most vulnerable community members amid COVID-19. Each week, Foster said she hangs the plastic bag carrying the meal on their doorknobs, says a quick prayer and leaves before they get to the door to minimize interaction. "Seniors are our history, our wisdom," she said. "And we have to stand up for them to make sure they're OK."



HOW WE'LL GET THERE

“Having these lunches, it’s just one less thing for us to think about.”

— Megan Bustamante, mother of three, at a Greater Chicago Food Depository summer Lunch Bus stop in Lansing



We have a vision for ending hunger in Illinois that focuses on better connecting people to nutrition programs, improving access to food, and promoting nutrition. To get there, we will focus on three key strategies: leveraging technology to connect people with benefits, harnessing innovation to help programs reach more people, and working more collaboratively across agencies and community-based organizations to promote program awareness.

LEVERAGING TECHNOLOGY: MORE TOOLS, BETTER TOOLS

Technology has the power to transform the way we interact with the world, and that power should be leveraged to better facilitate and maintain enrollment in nutrition assistance programs.

Some people feel more comfortable applying for and managing benefits in person and over the phone, so there will always be a need to maintain strong, traditional services. But technology provides new ways to connect, and some of the tools that are taken for granted in the private sector are not fully utilized when it comes to nutrition assistance. For example, Illinois residents are able to apply for SNAP benefits online, but not through a mobile app, despite the fact that more people have access to a smart phone than have access to a home computer or home internet. A mobile app would enable people to submit an application and upload supporting documents using a smartphone.

The percentage of U.S. households owning a laptop or desktop computer currently stands at just 74 percent, the same number that owned these devices in 2008, whereas 81 percent of homes have smartphones.⁵¹ The industry tracker Statista estimates that 258.2 billion apps will be downloaded in 2020.⁵²

While WIC participants can monitor their benefits using a mobile app, they are unable to apply through either an online

portal or a mobile app. Some portions of the WIC application and eligibility determination process must be done in person, but the program could pilot an online scheduling system to make it easier for clients to schedule and reschedule appointments.

Both SNAP and WIC rely heavily on paper mail to communicate with clients about their benefits. Leveraging email and texting platforms would provide an additional — and faster — way to communicate with clients. Email and texting platforms could also be used to send reminders about upcoming appointments and other information that helps people maintain enrollment in nutrition programs. Electronic communications would be especially helpful for people who don't have stable housing because it would make sure they can receive notifications even if they do not have an address where they can receive a mailed notice.

These technology tools have moved beyond the “nice to have” category and now sit squarely in the “must have” column. While the potential for technology to improve program delivery is not limited to the list below, below are important recommendations to get started:

- **Create a simplified mobile-friendly application for SNAP** to make it easier for people to apply for and maintain benefits
- **Create an online scheduling system for WIC** to make it easier for people to schedule an appointment
- **Encourage school districts to provide electronic applications for free and reduced-price school meals** to provide an alternative way for families to enroll in breakfast and lunch
- **Launch an afterschool meals texting program** so families can locate nearby program sites



Spotlight on Equity:

Census data shows that race and ethnicity affect people's access to technology. Over 36 percent of Black households and 30 percent of Hispanic households do not have access to internet or computer, compared to 21 percent of white households and about 12 percent of Asian households.

Even as Illinois takes steps to leverage technology to make it easier to apply for nutrition assistance programs online or by phone and communicate about benefits via email or text, inequitable access to technology leaves low-income people of color further disconnected from needed assistance. Efforts to leverage technology to facilitate enrollment in nutrition assistance programs must be coupled with efforts to ensure equitable access to technology, including internet, computers, and smart phones.

- **Leverage e-mail and texting platforms** to facilitate communication with nutrition program clients about applications, appointments, and renewals
- **Utilize data mapping** to assess how well nutrition programs are responding to populations and communities with greatest need

HARNESSING INNOVATION: NEW WAYS OF WORKING

To make sure we are meeting the needs of people facing hunger, we should constantly strive to find new and better ways of connecting people with food and nutrition programs.

One important area for innovation is around improving food access. Too many rural and urban communities struggle to access food, whether because residents must travel a long time to reach a grocery store or food pantry, or because they lack a child or older adult meal program nearby. State agencies, community-based organizations, and food retailers should work together to pilot a comprehensive set of strategies to improve overall food access, including access to nutrition programs, the emergency food system, and food retail. Areas for innovation include:

- **Co-locate food access points with transportation hubs, health centers, and public benefits offices**, for example locating a farmers' market at a bus interchange or senior center, or operating a food pantry at a WIC clinic
- **Increase the number of meal program sites**, for example by encouraging schools operating a lunch program to operate a breakfast program or encouraging summer meal program sponsors to operate afterschool snack or supper programs year-round
- **Leverage innovative delivery models for groceries and meals**, such as online shopping, home delivery, and mobile markets

- **Provide shopping assistance** for older adults and people with disabilities
- **Support nontraditional food retail**, for example farmers' markets, urban agriculture, and community gardens
- **Provide technical assistance and equipment grants** to increase the capacity of food pantries and independent retailers, whether a rural grocer or urban corner store, to store and distribute fresh produce and other perishable foods

Another opportunity for innovation is around the implementation of federal nutrition programs. States have considerable flexibility in how they administer SNAP, WIC, child meal programs, and senior meal programs. States can choose from available program options or request additional flexibility through policy waivers and pilots, subject to federal approval.

State agencies already take advantage of many of the flexibilities available. For example, in 2020, the Illinois Department of Human Services implemented a pilot allowing SNAP participants to shop online for groceries. This important pilot enables SNAP participants to receive groceries through home delivery, an option that is especially important as people practice social distancing during COVID. The Illinois State Board of Education allows schools to serve breakfast after the bell. By making breakfast part of the school day, more children receive healthy breakfasts to start their day.

Through state options, waivers, and pilots, government agencies can lead the way in our efforts to innovate around program delivery. Priority recommendations include:

- **Secure and implement the Elderly Simplified Assistance Demonstration Project** to make it easier for older adults to apply for and recertify SNAP benefits



Spotlight on Equity:

Accessing affordable and nutritious food is a challenge for many low-income Americans. In 2015, an estimated 12.7 percent of U.S. census tracts fit the category of low-income/low-access, meaning a significant portion of the population had limited access to a food store. But research shows that Black and Hispanic populations in Chicago are more likely to face food access barriers than Whites, with persistently low-access areas concentrated in majority low-income areas on the city's south and west sides.

Despite a 20 percent increase in the total number of supermarkets city-wide from 2007 to 2014, not all residents benefited equally because full-service grocery stores increased in some areas but not others. Supermarket growth in Chicago did not benefit populations already facing greater food insecurity and low levels of food access. As a result, low-income, majority Black and Hispanic neighborhoods still lack sufficient access to healthy foods. As we work to improve access to affordable, nutritious food across Illinois, we must take steps to also ensure equitable food access.

- **Secure a waiver to allow community-based organizations assisting with SNAP applications to collect applicant signatures over the phone** so people could get benefits more quickly
- **Secure the Medicaid home-delivery waiver** to reimburse for home-delivered meals to older adults
- **Support increased breakfast participation**, for example by setting participation goals and providing start-up funding and technical assistance to help schools implement innovative breakfast models

STRENGTHENING COLLABORATION: WORKING BETTER, TOGETHER

Ending hunger requires the efforts of multiple stakeholders, so it is essential that we collaborate to maximize our collective impact.

Collectively we must better coordinate our efforts to raise awareness of nutrition programs and emergency food programs — what programs are available, who is eligible, and how to apply for and access them. Community-based organizations are trusted partners in their communities. To help get the message out to people, state agencies should leverage community-based organizations, and not just those involved in food assistance.

State agencies can also work within government to better connect people with programs. There should be no wrong door to access nutrition assistance. State agencies can cross-promote programs among current participants. Improved and more frequent data sharing across agencies would allow the state to identify people enrolled in one program who are eligible for but not enrolled in another program. This increased collaboration would help connect eligible people with nutrition

assistance programs. A mix of strategies is necessary to better connect existing and potential nutrition program participants with nutrition assistance:

- **Coordinate on a public-private marketing campaign** to educate consumers about nutrition programs, utilizing culturally competent communications
- **Encourage government agencies and community-based organizations to use social media** to inform existing participants about program changes and potential participants about how to sign up
- **Improve program promotion across programs**, for example promoting WIC at Head Start centers, so that people enrolled in one program are made aware of other programs for which they may be eligible
- **Improve data matching across programs**, for example direct certification between SNAP and school meals or adjunctive eligibility between WIC and Medicaid, so that people enrolled in one program are more quickly connected with other programs for which they are eligible and may wish to enroll in
- **Create a one-stop, no wrong door entry point**, for example a state 211 line or inter-agency website with comprehensive nutrition program eligibility and enrollment information and referrals to the emergency food system
- **Improve coordination among community-based organizations** to improve equitable access to nutrition assistance



Spotlight on Equity:

In a survey of nearly 250 community-based organizations across Illinois conducted in July 2020, the Illinois Commission to End Hunger found that less than seven percent of organizations always include the individuals most affected by hunger when discussing solutions to food insecurity. Nearly 40 percent of organizations participating in the survey reported that food insecure individuals were rarely or never at the table when having those discussions.

Engaging people and communities most affected by food insecurity in the identification, implementation, and evaluation of solutions is important to ensuring equitable access to food assistance.

COVID IMPACT: PEOPLE EXPERIENCING HOMELESSNESS

COVID IMPACT

Shelters have reduced their bed capacity in order to support social distancing during the COVID-19 pandemic. Some homeless people have found other shelter accommodations disconnected from the social service infrastructure, increasing their food insecurity. The homeless population also faces preexisting barriers to accessing public assistance programs. For example, the lack of permanent address or lack of identification can make it harder to enroll in programs.

COVID POLICY RECOMMENDATION

Increase shelter and kitchen capacity to ensure access to food assistance and other services; provide program outreach and application assistance; reduce enrollment barriers.

CLIENT STORY

For nearly 30 years, the Providence Soup Kitchen — run by the nuns of St. Mary of Providence — has served hot meals to neighbors in need from across the Chicagoland area. In March, when COVID-19 began to spread, the kitchen quickly adapted to continue providing needed food. A small crew of volunteers still prepares meals in the kitchen on the church's lower level, but those meals now go in to-go containers and bags. Early in the coronavirus pandemic, Damien Copening, 43, lost his job as a line cook when his pizza restaurant was forced to close. Then he lost his apartment because he wasn't able to pay rent. Now he's homeless and looking for work. He's been homeless before, he said, and was able to improve his situation. He hopes he can do so again. The food at the Providence Soup Kitchen sustains Copening as he seeks employment and housing. "It helps out well," he said. "It gets you through half the day."

Photo: Damien Copening



CONCLUSION

“We at the St. Louis Area Foodbank strongly believe that together we will all prevail in the end. We are encouraged daily by our volunteers, our donors, and our partner agencies on the front lines serving those in need.”

— Meredith Knopp, CEO



A NEW DIRECTION

Ending hunger will require a sustained commitment. The first and most important step is to ensure that nutrition assistance programs are accessible and fully leveraged, and to make sure that people have access to affordable, quality food in their communities. We have the programs in place to alleviate hunger. By expanding awareness of programs, eliminating barriers to participation, and expanding access to nutritious foods we can ensure that more food insecure people are connected to the nutritious food that they need.

The three most meaningful ways to make that vision a reality are to:

- **Leverage technology:** Technology should be leveraged to make it easier to enroll — and stay enrolled — in nutrition assistance programs.
- **Harness innovation:** We must re-envision what food assistance looks like by piloting a comprehensive set of strategies for improving food access in underserved rural and urban areas and fully leveraging policy innovation in program delivery.
- **Strengthen collaboration:** Working together better can improve awareness of food assistance programs and ensure that all doors lead to the programs people need.

While strengthening nutrition programs and improving access will alleviate hunger in the near-term, we must address the root causes of poverty and racial inequity and create economic opportunity for all communities if we are to eliminate hunger in Illinois. Poverty and racial inequity limit opportunity in Illinois and across the country. Ensuring access to good-paying jobs, affordable housing, reliable transportation, and quality child care are critical to realizing lasting food security and meeting the promise of equitable economic opportunity. To that end, we will work in partnership with the Commission on Poverty Elimination and Economic Security to advance strategies that reduce poverty and promote economic opportunity for all Illinoisans.

STRONGER TOGETHER

We won't successfully achieve our goals without an inclusive process that includes people facing food insecurity. We must center these voices throughout our work, from planning to implementation to evaluation. This is the way to best inform what is needed to reduce hunger and how nutrition programs can meet those needs — for rural and urban communities, for Black and Hispanic communities, for families with young children, for older adults and people with disabilities,

for noncitizens and immigrants, for people experiencing homelessness, for everyone in Illinois who is struggling to get enough to eat.

The responsibility to end hunger in Illinois is a shared one. These changes will not happen without hard work and an expanded team committed to that work. Ending hunger in Illinois will require leadership from state and local elected officials and government agencies to enact or implement needed policy changes. Likewise, advancing a vision to end hunger will also require the efforts of countless community-based organizations and private sector partners across the state. By engaging stakeholders to better understand what food insecurity looks like and what solutions are needed, we can work together to realize the change we need.

This roadmap highlights the way, but each of us has responsibility to help take Illinois where we need to go. The Illinois Commission to End Hunger is committed to working with stakeholders across the state to identify and implement the change needed to reduce hunger in Illinois. Together we can ensure that Illinois is a place where each of us has the food we need to thrive.

COVID IMPACT: NON-CITIZENS AND MIXED STATUS HOUSEHOLDS

COVID IMPACT

Non-citizen households are less likely to be eligible for public assistance programs like Medicaid and SNAP, increasing their health risk and limiting the economic supports available. Federal immigration policy looks at utilization of certain government benefits in deciding whether to grant a green card, visa, or admission into the United States, a policy known as the “public charge” test. Ongoing fears about the public charge test and confusion about which programs count toward the test — whether now or in the future — have also made non-citizen households reluctant to enroll in programs for which they are eligible. Adults living with at least one noncitizen family member were significantly more likely to be food insecure (26.6 percent) during the pandemic than those in families where all members are citizens (18.8 percent).⁵³

COVID POLICY RECOMMENDATION

Increase awareness about programs that do not count toward the public charge test; provide program outreach application

assistance; leverage trusted messengers to overcome misinformation and stigma.

CLIENT STORY

Joann Montes shared the story of a mixed status family in West Suburban Cook County that she assisted in applying for benefits during the pandemic: “Both parents are undocumented immigrants, and their three children are U.S. citizens. The mother had attempted to apply for SNAP previously but thought the household was not eligible because of their immigration status. The parents were afraid of being detained or deported if they attempted to get any help, but were in a dire situation -- both parents were unable to work as they were quarantined with COVID-19.” Joann was able to clarify the family’s eligibility and help them apply for SNAP benefits for their children, providing much needed relief to the family’s food budget.





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GLOSSARY OF NUTRITION ASSISTANCE PROGRAMS

The Emergency Food System is a network of food banks, pantries, soup kitchens, and homeless shelters operated by charities and other nonprofits. Much of the food distributed through the emergency food system is charitably funded, some is provided through federal commodity programs like TEFAP.

Supplemental Nutrition Assistance Program (SNAP) provides monthly benefits via an electronic benefits transfer card. Serves households with gross income up to 165 percent of the federal poverty guidelines (FPL) in Illinois. All households must meet a net income test of 100 percent of FPL.

The Emergency Food Assistance Program (TEFAP) distributes food through emergency feeding organizations like food banks, pantries, kitchens, and shelters.

Special Supplemental Nutrition Program for Women, Infants and Children (WIC) provides a monthly food package to pregnant or nursing women, infants, and children up to age 5 in families under 185 percent of FPL. Also provides nutrition counseling and health care referrals.

Child Nutrition Programs provide meals and snacks in school, child care, after school, and summer settings. Households with income below 130 percent of FPL qualify for free meals. Households between 130 percent and 185 percent of FPL qualify for reduced-price meals.

Older Adult Feeding Programs provide meals to adults age 60 or older in congregate settings or through home delivery. While there is no income requirement, services are targeted to people with the greatest economic or social need.

SNAP	SNAP		
Free Child Meals	Reduced Price Child Meals	Reduced Price Child Meals	
WIC	WIC	WIC	
Senior Meals	Senior Meals	Senior Meals	Senior Meals
Emergency Food System	Emergency Food System	Emergency Food System	Emergency Food System
<130% FPL	130-165% FPL	165-185% FPL	>185% FPL

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