



Testimony Submitted by

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Before The New York City Department of Health and Mental Hygiene

Chapter 34 (Grocery Delivery Program)

to Title 24 of the Rules of the City of New York Public Hearing

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My name is Jerome Nathaniel and I am City Harvest's Director, Policy & Government Relations. Thank you to The Department of Health and Mental Hygiene (DOHMH) for holding today's hearing and the opportunity to submit comments on the DOHMH's proposed Amendments to Title 24 of the Rules of the City of New York, adding a new Chapter 34 (Grocery Delivery Program), which would establish rules for a subsidized grocery program.

As a longstanding anti-hunger organization that has implemented a multitude of food incentive programs for New Yorkers to access affordable and healthful foods at brick-and-mortar stores, farmers markets, and even community supported agriculture, we are well aware of the incredible opportunities and challenges that come with providing critical programs like Groceries-to-Go. In our comments, we emphasize five areas that the DOHMH will need to address in order to strengthen and fortify the program:

1. Inclusive and equitable **eligibility** for the program
2. Adequate **technical assistance, education and referral systems** to accompany the program
3. Adequate and equitable criteria for the size and use of the program's **benefits and credits**.

About Us

City Harvest is New York's first and largest food rescue organization, helping to feed millions of New Yorkers who struggle to put meals on their tables. During our 40 years serving New Yorkers in need, we have rescued more than one billion pounds of fresh, nutritious food and delivered it—free of charge—to hundreds of food pantries, soup kitchens, community partners, and our own Mobile Markets® across the five boroughs. This year, we will rescue and distribute more than 75 million pounds of nutritious food to our neighbors in need, with the majority of the product we deliver being fresh produce. However, charity cannot address hunger on its own. In addition to our charitable food distribution, City Harvest continues to provide a multitude of interventions, including nutrition and culinary education programming, capacity building for site where people access food in their community, and policy and advocacy.

City Harvest is an early member of the NY Food Policy Alliance, a diverse network of various food access organizations coming together to fight for a more equitable food system. The Alliance's mission is to identify and advocate for public policies and funding that promote access to healthy and affordable food to both respond to today's crisis as well as address the ongoing vulnerabilities and injustices of the food system. Many of our partners helped administer the original COVID 19 Get Food Program and have followed with interest the continuation of the Groceries to Go Program. As a collective, we are pleased with the continued commitment the Administration has shown to making sure that marginalized individuals are able to receive access to healthy affordable food.

Challenges that New Yorkers Face

The Chapter 34 (Grocery Delivery Program) program emerged in the wake of the Covid-19 pandemic. Our city has not fully recovered from the economic impacts of the pandemic. Many families are still struggling to make ends meet and our partners are seeing an unprecedented demand for emergency food assistance.

As the new year begins, millions of New York City families are struggling as costs for food, rent, and other necessities remain at near-record highs. Grocery prices continue to rise at their fastest rate in 40 years — up 12% over the past year. The cost of bread and dairy have increased 15% and eggs have increased an astonishing 49%.

The need for food in NYC continues to outpace pre-pandemic levels. Compared to 2019, average monthly visits to New York City food pantries and soup kitchens remain up nearly 75%. To meet the need in NYC, this year City Harvest will rescue and deliver 75 million pounds of food for New Yorkers in need — nearly 20% higher than pre-pandemic levels.

However, charity is not designed, nor solely responsible, to efficiently address systems change in place of effective public policy. We applaud the City for continuing to invest in food assistance for New Yorkers in need, and are both hopeful and eager to see how the City builds on the lessons we have learned from effective interventions over the past three years to truly address food insecurity.

Aside from strengthening the emergency food network, it is of the utmost importance that NYC is putting money in the hands of New Yorkers to make their own decisions about what they want to eat, when they want shop for food, and from where. Programs like Groceries-to-Go are effective blueprints to do just that. That said, we do have some feedback about the most recent version of the Groceries to Go program as outlined in the proposed rule. We call upon DOHMH and policy makers across New York City to work strategically, quickly, collaboratively and with direct input from impacted communities to respond to the following recommendations:

Program Opportunities and Recommendations

Eligibility

1. This program is a continuation of the Get Food program that was created at the height of COVID-19. However, most participants that stopped receiving produce from the Get Food program will not meet the requirements for this iteration of Groceries to Go Program due to their physical capabilities and health status. We understand participants from the Get Food program that are not qualified for the Groceries to Go program will receive verbal suggestions for “other resources” including food access providers. We strongly believe that excluding these individuals from the program undermines the overwhelming majority of New Yorkers who face food insecurity. Furthermore, directing these families to an emergency food system that is currently stretched thin as opposed to providing the opportunity for them to shop for the food they want on their own schedules is not the best approach. We urge DOHMH to provide more actionable support and resources to those approximately 3,500 - 5,000 original enrollees of the Groceries to Go program who will likely not be eligible for this new iteration.
2. We encourage DOHMH to define its household age requirements in the rule and allow for the participation of young adults who meet the eligibility criteria. We know that adults are not the only group of people that suffers from diabetes. Therefore,

including adolescents and young adults in the program will help alleviate further food insecure burdens and expand the pool of eligible New Yorkers.

Technical Assistance, Education & Referral System

3. Ensure all those screened receive information about other programs that support food access; Use this as an opportunity to share related information and resources (e.g. Health Bucks, Get the Good Stuff, Half off Farmbox, Senior and WIC farmers' market coupons, MTA Fair Fares, etc.).
4. We as a community know that technology is a barrier for most elderly individuals as well as other populations. Well established organizations in the food access sector, including City Harvest, have shared that the email requirement for enrollment in the program can be a form of barrier for many New Yorkers. Such a requirement for previous programs that City Harvest piloted required significant bandwidth to help senior create email addresses, check their balances online and troubleshoot other technical issues (we are happy to discuss this pilot program, called Nutrisavings, in greater details in a follow up meeting). We recommend that program administration provides clarity in the proposed rule that they will implement technical assistance support for all participants and provide alternate access points for the program, including enrollment by telephone or in person at food pantries and other community hubs.
5. In addition to the technology barrier, we recommend providing tablets to participants who otherwise would not have access to enrolling and/or ordering to alleviate potential barriers for registering on the Mecarto platform effectively and placing orders to their selected merchants. This technology will also provide participants with ease of communicating with Mercato customer service representatives and their delivery person through the online platform. Lessons from distributing equipment for students during the height of the pandemic and the transition to remote school can be leveraged for the distribution of equipment for this program.
6. Ensure regular outreach is conducted when users are first enrolled so that participants can access as soon as they are enrolled to minimize barriers. Develop a clear and concise Q & A platform that clearly illustrates what can be purchased using the credits provided, deadline for when the credits are expired and the amount of merchants they can order from in one order.
7. Evaluate the individuals that do not choose to move forward with the program, and who are removed/don't go through the process of spending. This could help identify subsets of New Yorkers who may need to be targeted for more in-person opportunities/other programs. Additionally, participants should be informed of the quantitative and qualitative data that will be collected in order to capture key

performance indicators for the program, and to adequately address any privacy concerns.

Benefits & Credits

8. Given the short timeframe in which the currently available funds will need to be spent (by June 2023) and the highly specific eligibility requirements, we are concerned that enrollment will have a slow start and the DOHMH may not be able to fully enroll 5,000 New Yorkers in time to spend down all of the available funds. We strongly recommend the monthly credits allotted to each participating household are increased to ensure that funds are reaching the individuals that the program is intended to serve. This will make the program more impactful for households and ensure that unspent credits do not go wasted and end up in Mercato's pocket.
9. We encourage the program to allow enrollees to have the freedom to use the credits on food items of their choosing, to allow households to make choices that reflect need, cultural preference, dietary, medical or religious requirements and personal taste. The rules state that eligible groceries, "may be limited to certain categories as determined by the Department." We strongly encourage the DOHMH not to apply additional limitations to eligible foods and to maintain that Grocery to Go credits can purchase SNAP approved items. According to a 2021 [Meals for Good Supermarket and Grocery Store Voucher and Gift Card Pilot Program](#), participants "bought foods that are not frequently provided at food pantries, such as meat products, oil, and spices." We know have seen that proteins and dairy are hit the hardest by inflation — the demand for these products at our pantry partners is no coincidence. We encourage this program to not limit the purchases of proteins and dairy.

Thank you for your time and consideration.

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