

# **NY Food Policy Alliance**

**Testimony Submitted by  
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On behalf of the NY Food Policy Alliance  
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  
January 13, 2023**

My name is Iyeshima Harris and I am the Policy Manager of Equity Advocates. 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.

Equity Advocates builds the capacity of nonprofit organizations to address the underlying causes of food inequity through policy and systems change. We partner with New York-based organizations working to alleviate hunger and poverty, providing them with the tools they need to be more civically engaged—including policy education, advocacy training and coalition leadership, such as convening the NY Food Policy Alliance since March 2020.

NY Food Policy Alliance is 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.

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. Since May of 2020, the unemployment rate in New York City has hovered around twice the national average at around 5.6%.<sup>1</sup> In addition, families are experiencing historically high levels of inflation and a significant increase in housing costs. The most recent United States Department of Labor data shows that inflation rose to a record 9.1% in June 2022, the largest gain in nearly four

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<sup>1</sup> <https://projects.thecity.nyc/nows-new-york-city-doing/index.html>

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decades, reflecting increased food, shelter, and fuel costs nationwide.<sup>2</sup> In that same time period, United States Census Bureau Household Pulse Data Survey results from September 2022 estimate that 64% of respondents had difficulty paying for usual household expenses.<sup>3</sup> With a national economic recession looming, we are concerned that the poverty rates, inequality and need for food assistance we are already seeing across the city will worsen.

We applaud the City for continuing to invest in food assistance for New Yorkers in need. It is important and great that NYC is putting money in the hands of New Yorkers to make decisions about what they want to eat. 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 DOHM 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:

### Sourcing & Supporting Local Economies

1. We urge the Administration and DOHMH to consider how food assistance programs like Groceries to Go can benefit multiple stakeholders, including both food insecure New Yorkers as well as support local food producers and retailers in NYC. We'd like to see the program provide more opportunities for support of local farmers and small businesses to access the opportunity to sell their produce. Although Mercato has a delivery program built in its network, we recommend identifying and working with other local delivery services to expand the reach of the produce, especially when thinking about local farms and farmers markets. Please see several examples of community based online delivery services that DOHMH could connect with for current or future iterations of Groceries to Go:
  - a. [Delivery Co-op](#) is a NYC based delivery service that charges businesses a monthly fee to enroll. Subscribers or users who order through the platform are charged no cost for their deliveries. Additionally, each restaurant that is part of the platform owns equity in the company and becomes co-op owners. In addition, they hire locally and pay their staff a fair wage. New York City is home to a diverse array of businesses and we encourage the Administration to invest its purchasing power in community based social enterprises.
  - b. [Brooklyn Supported Agriculture \(BSA\)](#), a project of Brooklyn Packers food sourcing, packing, and distribution cooperative, for Brooklyn and Bronx based program participants. BSA's online market of fresh produce sourced primarily from small food businesses, with a preference for worker-owned cooperatives and POC / LGBTQIA+ / women-owned farms and offers both delivery and pick up options.

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<sup>2</sup><https://www.bls.gov/opub/ted/2022/consumer-prices-up-9-1-percent-over-the-year-ended-june-2022-large-increase-in-40-years.htm#:~:text=Consumer%20prices%20up%209.1%20percent,U.S.%20Bureau%20of%20Labor%20Statistics&text=The%20.gov%20means%20it's%20official>.

<sup>3</sup> <https://www.census.gov/data/tables/2022/demo/hhp/hhp50.html>

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- c. [Fellow Farmer: Order online from your local farmers market](#)
2. That said, we encourage DOHMH and the Administration to leverage its relationship with Mercato, an online platform that houses 350 diverse stores, to expand the number of community based and BIPOC-owned businesses participating on the platform. Although the Mercato platform has over hundred vendors, it would be a great addition for local farmers or farmers markets and small businesses to be able to enroll on Mercato platform so they too can benefit from this funding. The Administration should cover the processing fees that stores have to pay for each purchase to lower the barrier to participation and enable them to benefit from the Groceries to Go purchase. Supporting the participation of small businesses, local farmers and farmers markets on the platform will help create an inclusive environment that represents the NYC food system. As we know, farmers markets are the source of locally grown produce, most of the time culturally appropriate produce. We encourage DOHMH to incorporate in the proposed rule providing Health Bucks to these participants in addition to Mercato credits where they can use these coupons to purchase food at local farmers' markets.

### Benefits & Credits

3. Given the short timeframe in which the 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.
4. In the event that participants fail to use their credits to purchase on the Mercato platform we recommend that the DOHMH implement a credit rollback system within 5 months of the individual inactive communication. This credit rollback can be redistributed to active program participants in the final month of the program.
5. 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 or medical 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 hear from our emergency food provider partners that proteins and dairy are hit the hardest by inflation and we encourage this program to not limit the purchases of proteins and dairy.

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## Eligibility

6. This program is a continuation of the Get Food program that was created at the height of COVID-19. However, most participants that were receiving produce from the Get Food program will not meet the requirements for the 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 removing individuals from the access to receive this program due to their health or housing standards does not alleviate the burn of food insecure households. 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.
7. 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.
8. We recommend DOHMH to consider expanding the list for diet related conditions to widen the scale of the program so that it can reach other individuals that are food insecure.

## Technical Assistance & Education

9. 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, etc.).
10. 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 have shared that the email requirement for enrollment in the program can be a form of barrier for many New Yorkers. 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.
11. 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.
12. 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.

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13. 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.

Thank you for your time and consideration.

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