



Recommendations

for the Emergency Food Assistance Program

WSDA Food Assistance



**FUTURE
EMERGENT**

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Prepared by josh martinez
Future Emergent, LLC

www.futureemergent.com

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Executive Summary

Background

The Emergency Food Assistance Program (EFAP) funds food banking activities at food pantries, food banks, and distribution centers around Washington state. The historical intent of the program was to provide some foundational funding or food to all participating local food pantries in Washington. Participants would decide by vote at the local level how to distribute resources in their region. EFAP was not designed to fully fund participating hunger relief organizations. Funding services since 1985, most recipients use their allocations to pay for staffing costs, equipment, or community-relevant food.

What People Like

- EFAP is flexible funding that hunger relief organizations can use to fund essential services.
- EFAP can operate like emergency savings, available to reimburse unexpected costs.
- The Spring Meeting is a chance to reconnect with colleagues and plan funds for the region.

Key Challenges

- People who are Black or Indigenous, or people of color, have never had equal food access.
- The emergency food system has changed since 1985, but it has not kept up with changing community needs and our understanding of food security.
- Community food needs increased during the pandemic, and stayed high in many regions.
- EFAP funding doesn't cover all operational expenses, even at highly efficient organizations.
- Staff turnover has led to institutional knowledge loss.
- Data collection, specifically new and returning client numbers, is inconsistent across the state.
- EFAP Spring Meetings can be contentious, with organizations fighting over funding.
- The voting system for Spring Meetings is unfair to new organizations and nonvoting members.

Recommendations

- **Values:** Reposition our values toward food justice and the human right to food.
- **Funding:** Understand the true cost of food assistance. Help organizations feel funding secure and move away from scarcity and towards abundance.
- **Contracts:** Make EFAP contracts and other documents easier to read and understand. Review and revise EFAP policies so they are community-supportive first.
- **Spring Meeting:** Standardize the spring meeting across the state. Begin to address complex decisions, like adding new members and making allocations, before the Spring Meeting so they can be discussed at length and documented.
- **Allocations:** Create standard allocation models that all regions can use. Define clear outcomes for funding and adopt fairer decision-making and conflict resolution processes.
- **Training:** create trainings for each type of EFAP recipient (contractor, subcontractor, food bank distributor, EFAP applicant) that cover essential EFAP procedures and policies.

Introduction

The Emergency Food Assistance Program (EFAP) is a flagship Food Assistance program run by the Washington State Department of Agriculture (WSDA). EFAP reimburses expenses that Hunger Relief Organizations (HRO) incur while performing food banking activities. The program has existed almost four decades. WSDA allocates funds to EFAP as one part of their portfolio of food assistance programs. EFAP in turn allocates funding to each county based on American Community Survey (ACS) 5-year data. We first measure the total number of people in Washington state who earn less than 100% of the Federal Poverty Level (FPL). Each county then receives funding proportional to the number of people below 100% FPL compared to the state total.

A contractor in each county or region receives this funding to serve the subcontractors in their region. A subcontractor is a non-profit organization who has a signed contract with their contractor to receive EFAP funds and/or food. The non-profit organization must distribute food directly to people in need to qualify for EFAP subcontractor funding. Organizations who are interested in becoming a subcontractor are approved by a vote of existing subcontractors in their region. These votes occur in a Spring Meeting that takes place every 2 years. Subcontractors also vote to decide how funds will be allocated within their region. The contractor is allowed up to 10% of the region's funding to offset administration costs to conduct subcontractor audits, manage the reimbursement process with the WSDA, and ensure funds are spent according to EFAP rules.

Other organizations in the food system do critical work in the distribution of food throughout the state. These organizations may request EFAP funding, which is again decided by the subcontractors in their region. Voting members can also allocate funds to non-profit organizations that provide advocacy or support services to food banks and pantries.

EFAP has operated according to these rules for longer than most of us can remember. What does running EFAP look like across the state? How does it work, and where is it not working? Does it function for everyone's benefit? White cultural norms and practices dominate food banking, like they do in many non-profit industries. Across much of society, we recognize that those practices have had an unfair or even oppressive impact on people who are not white.

In her 2004 paper, "Dismantling Racism in Community Food Work," professor Rachel Slocum writes, "Decision making structures, whether coalitions or committees, formal or informal, that do not have a process to truly represent the concerns of communities of color will result in democratically arrived at decisions that reflect the dominant society. The culture of white organizations must actively recognize racism within and without if they are to confront their internalized superiority and recognize the ways that superiority acts." (Slocum 2004) This means that without input from a diverse range of perspectives, backgrounds, and experiences, people will often write rules and create initiatives that by default support and uphold their place in the system.

My approach

WSDA contracted with me, Josh Martinez of Future Emergent, to better understand the Emergency Food Assistance Program (EFAP) and create recommendations for improvement. I have more than 5 years of experience working with food banks, food pantries, and hunger relief organizations

across Washington state. I have experience applying for EFAP funds and participating at a Spring Meeting in two regions of King County. My perspective is admittedly incomplete: I relied on the perspectives of others to develop a more complete picture of the program and how it functions throughout Washington.

I spoke with more than 25 people in Washington state over a period of 6 weeks. These individuals came from organizations acting as contractors, subcontractors, and food bank distributors within EFAP. Some applied for funding as an organization that was new to EFAP. Others have voted in Spring Meetings for many years. They lead or work at food banks and food pantries, non-profit organizations, multi-service centers, coalitions, and foundations. They work in rural settings, in cities, or serve counties or regions. Each of them has experience working in EFAP, receiving funds, helping others understand the program, and more. This group cannot fully represent the entire food system that relies on EFAP funding. They do still represent a wide cross-section of leaders, all of whom know this program and how it functions at their local level.

I ground my approach for this report in questions that we're asking across the food banking industry, not just in Washington state. In what ways do we acknowledge that food is a human right? What are the impacts of food distribution operating under a charity model for so long? In what ways has that model hurt our communities and ourselves as an industry? How can we make EFAP and food assistance more accessible to people who are new to the system? How can we examine and disrupt power imbalances between programs? Those imbalances can exist whether the organization is old or new, resource-rich or resource-poor, white-led or BIPOC-led. They exist among hunger relief organizations based in cities, towns, and rural areas.

There is more to understand about this program and the outcomes we want it to create. I intend this report to be a starting point. Some actions we can take immediately. Other recommendations may need community engagement, further study, or deep discussion among stakeholders. Food banking in 2023 is at a crossroads. We must examine the status quo and dismantle what is discriminatory, privileging, or unfair. We don't need to make every decision perfectly going forward, but we must go forward.

Acknowledgements

I'm grateful to the following people who took the time to meet with me and discuss how EFAP works in their region. These perspectives are personal to the people I spoke with. They cannot represent every viewpoint in every part of the state. I used their words to inform my own thinking and perspectives on how to improve EFAP. The recommendations and takeaways are my own, but I invite everyone in the food assistance network to join me in speaking on how we can better and more fairly support food security efforts around the state.

Mike Cohen, Bellingham Food Bank
Erik Mora, Blue Mountain Action Council
Britany Meiklen, Chelan Douglas Community Action Council
Jeremy Yonaka, Chelan Douglas Community Action Council
Emily Straw, Clark County Food Bank
Brent Hunter, Coastal Harvest
Paige Collins, Council on Aging
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Mikel Priddy, Emergency Food Network
Glenn Turner, Emergency Food Program
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Nikki Lloyd, Snoqualmie Valley Food Bank
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Felicia Kolhage, St. Vincent de Paul Bremerton
Ken Trainor, Sunrise Outreach Center Yakima
Stacey Crnich, The Market / Bonney Lake Food Bank
Trish Twomey, Washington Food Coalition
Missy Belles, Whatcom Community Foundation
Kim Eads, WSDA Food Assistance
WSDA Food Assistance Team

Thank you for sharing your perspectives and ideas with me.

Background and Context

What is EFAP?

In 1984, the Washington state legislature approved the food assistance funding we know as EFAP for the 1985-1986 biennium. EFAP for tribal nations came on board in 1992. The state legislature appropriates this funding every biennium. The initial budget for the entire program that biennium was \$250K per year. The most recent biennium awarded more than \$18M to food pantries and tribal food banks (approx. \$9.1M per year). The 2010 law authorizing EFAP states, “These funds shall be for the purpose of funding the activities of food banks and food distributors, the purchase of special dietary needs foods, and providing special dietary needs training.” At least 70% of the total funding must be awarded to the counties for these purposes. All funding decisions made within a region must be approved by “a two-thirds vote of all participating food banks and the lead agency.” Unspent funding within a region must receive WSDA approval to be reallocated within that service area to an area of unmet need.

Applicant eligibility is also defined in this code under WAC 16-740-050. This is where the rules about operating as a 501(c)(3) non-profit for at least a year came from. While subcontractors may define service boundaries for the purpose of funding, the law encourages all subcontractors to serve the client regardless of the client’s home service area.

To date, WSDA and EFAP have made meaningful improvements to reducing some barriers to client access. WSDA clarified that client intake requirements are primarily based on client self-declaration, not documentation. (WSDA Food Assistance 2020) They also removed service area boundaries and restrictions, replacing the guidelines so that clients living anywhere in Washington state qualify for food assistance at any participating hunger relief organization (HRO). They continue to engage in stakeholder discussions to identify additional improvements to how clients experience our services no matter which HRO they visit in Washington. This report is the next step in identifying improvements for EFAP.

Creating a more just system

In their book DEI Deconstructed, DEI Consultant and author Lily Zheng defines equity as “the achievement of structural success, well-being, and enablement for stakeholder populations.” (Zheng 2023) Who are our stakeholders in food banking? I would define them as:

- Community members (being inclusive of the variety of food, language, and access needs all people have)
- People who distribute food
- Community leaders
- Farmers
- Farmworkers and foodservice workers
- Volunteers of hunger relief organizations
- Staff at hunger relief organizations

These stakeholders have quite different levels of representation in our current food system. Few organizations have the time or capacity to use (or even ask for) input from local community

members. When we receive donated food from farms in our state, when do we consider the success and well-being of the people who harvested or packed that food? Our commitment to racial equity in our state depends on successful outreach and decision-making by people in every stakeholder group. While this report is about EFAP, the implications cover the work of our entire industry.

The growing demand for food

In the early years of the COVID-19 pandemic (2020-2022), few leaders would deny that the demand for food was greater than ever at their hunger relief organization (HRO). The WAFOOD surveys during the pandemic's peak indicate that most people had a harder time finding food. (Drewnowski, et al. 2020) One person I interviewed said that a single meat processing company closed its doors during COVID-19. This left 1,400 people and their families suddenly without a paycheck. In the last few years, we've seen company closures due to COVID-19 and the economy. Some people lost their jobs; others don't earn enough money at the jobs they do have. Even in 2023, food insecurity levels are higher than they should be in one of the richest states in America. (Savaransky 2020) Hunger relief organizations that existed prior to COVID-19 added new services or changed existing ones to meet the uncertainty of the pandemic. Some of these changes, such as expanding a home delivery program, supported community members who couldn't travel to their local food bank. Other changes, such as operating a drive-thru food distribution model with no walk-up option, unintentionally excluded community members without cars from receiving food.

During COVID-19, new organizations started distributing food as well. Some were existing organizations that previously offered non-food-related support services. They pivoted to include food assistance to support members of their community during the pandemic. The United States Department of Agriculture (USDA) issued contracts for millions of food boxes. (United States Department of Agriculture 2021) Some of these boxes went to existing HROs in the food assistance network. Other boxes went to groups that had never distributed food before. These programs experienced widespread popularity. Thousands of families accessed food from brand-new community-centered groups. My own experience during this time showed me how great the need had become during the pandemic. It also suggested how many people weren't aware, or didn't feel served, by the existing hunger relief network. Why did so many new organizations appear during this time? Why were they so popular? What did community members think of the food banks and food pantries that were already around? How should we provide effective services while spending public funds efficiently?

I believe that some people who do need food avoid food banks and pantries. Rebecca de Souza notes in her book, Feeding the Other, that people avoid food banks because they fear the stigma of our spaces. (Souza 2019) People may be afraid of how they might be treated, how they were once treated, or how they think they might be treated. They may be recently unemployed or may not be legal residents of the state. Lots of food banks are actively working to change the stigma around needing food. We as a system could do more to bring consistency to how people across the state interact with our programs.

Report Findings

Across the state, each region manages EFAP a little differently. Many contractors operate systems that they've inherited. They may not know the original meaning or justification for their policies. Many regions begin the allocation process using the formulas they used at the last Spring Meeting. Contractors and subcontractors may not be aware of changes to the program or how those changes should or could be implemented in their region.

I'll describe my findings from the current state of EFAP in this section, starting with aspects of the program that my interviewees appreciated. I'll then describe key challenges I found throughout the system. In the final section, I'll make recommendations for how to improve specific components of EFAP and the emergency food system at large.

What people liked

EFAP is flexible funding. EFAP participants love how EFAP can cover nearly any expense related to food banking and distribution. Most participants spend their EFAP dollars in three areas: staffing costs, to purchase food for their community, or for equipment necessary to do their work. This type of multi-year funding for operations isn't typical of grant funding.

EFAP can act like emergency savings. Some food pantries think of EFAP funding like emergency savings. If a freezer goes out, they can use their EFAP allocation to cover that purchase. Others draw down a little each month, submitting receipts or invoices to their contractor for processing. Depending on the contractor, some have reserves and can reimburse an EFAP subcontractor's expense immediately. Others will submit the reimbursement request to WSDA for payment on behalf of the subcontractor.

Spring Meetings are a time to connect. Depending on the size of region, EFAP subcontractors may not see each other that often. The mandatory Spring Meeting serves as a place for subcontractors to get together and vote on how EFAP funds will be spent in their region. Members will meet over coffee cake, lunch, or refreshments. Guest speakers appear at some Spring Meetings to cover important topics. While this collegiality is true for some areas, it's not universal. In some parts of the state, Spring Meetings are less friendly. Conversations among partners can be contentious as participants struggle to share a too-small pot of funds for their region.

Key Challenges

People who are Black or Indigenous, or people of color, have never had equal access to food or funding. Every hunger relief organization operates under a policy of nondiscrimination. But our methods for correcting discrimination issues are lacking at every level of our food system. I can't tell you how many times I've heard about the food bank leaders who changed their hours to prevent Latine farmworkers from visiting after work. If there's a follow-up to that story—say, they changed their hours back after they realized what they'd done, or they lost funding when donors or other food system leaders learned what happened—I've never heard it. We all know clients who travel past other food banks to get to the one that doesn't ask for ID to receive food, or to a location that has a better variety of fresh or culturally-relevant produce. Have we asked ourselves, as a system,

why they have to do that? Discrimination can be hard to prove, and most people from dominant culture don't notice when it happens. Some people in the food banking industry want to be kind to the otherwise "good" volunteer who gives every Black or brown person the side-eye when they enter their food bank. They want to give the benefit of the doubt to people who say "we don't have any people of color around here" when they've done nothing to look for them. But too often we give our staff and volunteers the benefit of the doubt without making clear that this behavior is unacceptable. This places the comfort of the discriminator ahead of the person or people they discriminated against. If we are a community member's last option for food, and we shame or otherwise keep them from getting that food, we have made a choice about who does and doesn't go hungry in our state.

A study by Bridgespan and Echoing Green from 2020 revealed that Black-led non-profit organizations had revenues that were 24% smaller than similar white-led organizations. (Dorsey, Bradach and Kim 2020) The same study found that assets for Black-owned non-profits were 74% smaller than the white-led organizations. Even in the world of funding, we are not playing an equal game.

We can't say "we serve everyone" when the impact of that means we do not. We can't say "resources are tight for everyone" when we know that they are not. We can't end food insecurity for everyone in Washington state if people discriminate against, neglect, or ignore Black and brown people. We live in communities that we all share and work alongside people of all races in our collective fight for food security. The food system needs stronger protections, and clear plans for how we'll enforce those protections, for people who are routinely oppressed and discriminated against in this state.

Our understanding of food security is changing. Many hunger relief organizations in the state trace their origins back to the 1960s to 1980s. At the time, "emergency food" was the most appropriate name for the need those founders encountered. People saw food banks as temporary solutions while a person or family got back on their feet. Now, even people who are employed full-time may have trouble meeting basic needs. Since 1968, the minimum wage across the country has not kept pace with inflation. (Konish 2022) The situation is critical even in Washington state, which has one of the highest minimum wages in the country. Here, in 2022 a minimum wage worker would need to work about 72 hours a week to afford a 1-bedroom apartment. In King and Snohomish counties, that same person would have to work 90 hours a week. (Groover 2022) This doesn't even account for food, utilities, and other cost of living expenses. More Washington residents than ever now look to hunger relief organizations to meet their basic daily needs. Across the state, hunger relief organizations do not provide emergency food so much as they are providing essential food. If we choose to end food insecurity in Washington state, we have to recognize that the conditions we're in are not normal.

The food assistance system must continue to adapt. Hunger relief organizations around the state have long experimented with different approaches to distribute food to Washingtonians. That tradition continued with new or expanded programs during the COVID-19 pandemic. In addition to school backpack programs, we've seen more organizations starting home delivery, drive-thru programs, refrigerated lockers, online ordering, and more. The COVID-19 pandemic also saw new and existing social service organizations launch food distributions for community members. These

organizations did fantastic work alongside existing hunger relief organizations. Their presence also suggests to me that the existing hunger relief network was either less convenient or not accessible to people who needed food. Some food bank leaders stress over how to reach people who need food but don't visit their food bank. Many of these new hunger relief organizations show that it can be done.

EFAP funding does not cover all expenses. For many hunger relief organizations, transportation, food, and staffing expenses are on the rise. EFAP funding requires matching dollars by the recipient organization. Adding new programs to EFAP threatens to cut the level of funding these organizations are used to receiving each biennium. However, hunger relief programs that are new to EFAP deserve fair access to those funds as well. These tensions have turned into discussions and conflict at the local level.

Staff turnover can lead to institutional knowledge loss. Since 2020, burnout, career changes, and retirement have all led to the loss of people who used to manage EFAP at their sites. EFAP is often one of many programs that HRO leaders run. Departing leaders may have time to teach the monthly activities required of EFAP, but the Spring Meeting only happens once every two years. This turnover is unfortunate, but it can also be an opportunity for change. When we are new to something, most people rely on what's been done in the past. Some of these past practices were probably not designed to be discriminatory, but they still had discriminatory impacts. It's the outcomes of our policies that are important, not the intentions behind them. We will need to replace these policies and improve our food programs before we can end the cycle of racial injustice.

Data collection is inconsistent across regions. WSDA asks each contractor to submit reports every month that summarizes client activity in their region. EFAP participants track the number of new (unduplicated) and returning (duplicated) clients that visit their food distributions. Not every subcontractor collects this data in the same way. Most regions use client data to allocate at least part of their EFAP funds according to the client visit numbers at each HRO. A recent to-be-published survey conducted by Trish Twomey at the Washington Food Coalition asked respondents about how they collected this data at their agency. (Washington Food Coalition 2023) EFAP contractors and subcontractors may use different calendars (calendar year versus fiscal year) for establishing whether a client is new or returning. The questions they use at intake to establish new/returning can also lead to inconsistent client reporting. Some define a new client as someone who visits their food pantry for the first time this year; others ask if it's their first time visiting any pantry this year; still others may use the TEFAP definition of "new" to mean it's a client's first visit to that pantry this month. Contractors send in data that may be inconsistent. We may magnify those inconsistencies when we aggregate all this data up to the state level. These practices raise questions about how we report data on the level of food insecurity in Washington.

Spring Meetings can be contentious. Limited resources spread too thin can fuel local concerns about how much each organization might receive. New hunger relief organizations that enter this system can face even greater scrutiny. Voting subcontractors that received EFAP in the past come to think of funds as "their money." This may create worry about facing a great hardship if that funding was shared with newer agencies. Right now, subcontractors and contractors have the freedom to vote on new subcontractor qualifications at the local level. Without a statewide definition for what makes an organization qualified to receive support from EFAP, and how voters

should decide whether to fund an applicant, we risk unfair bias entering the voting process against these applicants.

Limiting votes in a region is unfair. Across the state, subcontractors hold significant voting power at their respective Spring Meetings. Contractors may vote on everything except for selecting the contractor. Food bank distribution centers and other recipients of EFAP funds can only vote if they are also a subcontractor. Community members and recipients of food assistance cannot vote unless they are a subcontractor. EFAP funds most often go to organizations that have received them before. Only new applicants for EFAP must make a presentation and formally request funding. Only existing EFAP recipients may vote for them. Newcomers can feel unwelcome or excluded from this process. The status quo embeds the power of people already in the system.

Program Recommendations

I make these recommendations based on conversations I've had with stakeholders all over the food system, including the people I interviewed specifically for this project. I grouped these recommendations on a timeline:

What can we do for the upcoming biennium (2023-2025)? These recommendations are edits or minor changes to the Emergency Food Assistance Program. I believe that we could incorporate these before the Spring Meetings take place or EFAP contracts go out.

What can we do for the next biennium (2025-2027)? These recommendations will take more time to develop, discuss, and roll out. We may need a subcommittee or team to work out the details before we move forward. If additional funding became available during the upcoming biennium (2023-2025), we could add these recommendations to the requirements for that funding.

Ongoing recommendations. These are recommendations and questions for long-term consideration. What does the future of our food system look like? What perspectives do we not yet have access to? How will newcomers see this issue in a different way than our current group of decision-makers?

Goal for EFAP funding

EFAP funding serves a valuable purpose across the state, but it is not limitless funding. We could make EFAP funds more readily available to organizations that are preparing for the future. We should prioritize funding for hunger relief organizations across the state to provide **consistent**, **safe**, and **respectful** service to people seeking food.

Values

I start with this recommendation because it's critical to our understanding of the others. People in the food banking industry view food assistance in two broad camps. One group of people generally sees the food banking system as **emergency** food: supplemental, temporary, and incomplete. We give what we can, but we don't have the resources to provide long-term assistance. Another group generally sees the food banking system as providing **essential** food: complete, nutritious, and

ongoing. They may see hunger as a symptom of poverty, which itself is driven by racism, classism, or both. Ending hunger means ending the root causes of hunger.

There's a spectrum of nuance between these two groups; people may have their own perspective that adopts beliefs from one or more camps. Many of the issues we face as an industry stem from tension between people along this spectrum. What is the goal of publicly-funded food assistance? What outcomes do we seek for our work? How can we dismantle a system that punishes Black, brown, and Indigenous people most often?

Recommendations for the 2023-2025 biennium

Adopt messaging that affirms that food is a human right. I recommend the food assistance network adopt the principle that food is a human right. Food is something every person deserves without conditions. People deserve food no matter who they are, where they live, how much money they have, or what kind of car they drive. Adopting that statement as our guiding principle gives us a foundation to address all the problems we face.

People are beginning to incorporate a right to food into their programs and policies around the country. The United Nation first recognized a right to food in their 1948 Universal Declaration of Human Rights. (United Nations 2010) In 2022, Maine became the first state to approve a constitutional amendment affirming the right to food. (Maine Legislature 2021) The legislation states, "All individuals have a natural, inherent and unalienable right to food, including the right to save and exchange seeds and the right to grow, raise, harvest, produce and consume the food of their own choosing for their own nourishment, sustenance, bodily health and well-being, as long as an individual does not commit trespassing, theft, poaching or other abuses of private property rights, public lands or natural resources in the harvesting, production or acquisition of food." (Maine Legislature 2021) Locally, Northwest Harvest lists a right to food as one of their legislative priorities in the state. (Northwest Harvest 2022) They see the right to food as being dependent on its availability, accessibility, and adequacy. (Northwest Harvest 2022)

Acknowledge how much the food system has changed. Who does and doesn't feel welcome at our food pantry? Why do some people need to visit more than one food bank each week to get enough to eat? Is a food pantry that's open once a month providing enough support to their community? What do we make of the mutual aid groups that stood up to provide food during the pandemic? Many of them remain popular even after community-based funding has declined. What can we learn from them? What would their services look like with access to the permanent funding that we already have? Answers to these questions can foster needed change in the programs and systems we work in.

Make our values explicit. Reiterate WSDA policy that every person deserves fair and nondiscriminatory access to all hunger relief organizations in Washington state. With the removal of service areas, make clear that a person visiting a WSDA-funded food pantry deserves food simply because they are physically present in Washington state. Every person who walks through our doors should feel like they belong—that their needs will be met and their humanity affirmed.

Recommendations for the next biennium

Set service expectations for organizations that receive EFAP funding. This recommendation would apply to any organization who receives a benefit from EFAP, whether directly or indirectly through a contractor. For subcontractors, these expectations could include being open a certain number of days per week or month. They could list the number of days' worth of food that a subcontractor should offer to clients. All recipients should be able to describe how they engage with community members, and how they collect feedback that informs their service. Organizations open to the public should offer signage for all written languages used in the county. They should offer interpreters for people who don't speak English; wayfinders for people with visual or mobility impairments.

One way to support these plans is with making additional grants or incentives available to HROs that increase their service offerings to systemically oppressed communities. I would resist using hierarchy-based terms like "tiers" to define this. How would you feel knowing you shopped at a "tier 3" food bank? We can't adopt new programming that dehumanizes clients or perpetuates inequity or unfairness in the food system.

Fund food assistance programs that include new models and approaches. Several food banks, pantries, and coalitions across the state are already exploring new distribution models that work better for local community members. Fund those examples and use them as models to fund other models at other organizations. Where do our rules create friction? We can still ensure client dignity and food safety while we try new approaches to food distribution.

Ongoing recommendations

Engage with community members on a regular basis. I encourage us to work towards policies and practices that build trust between communities and the organizations that serve them. The American Association of Medical Colleges released a trustworthiness toolkit developed in partnership with community members around the country (AAMC Center for Health Justice 2021). The toolkit, *Principles of Trustworthiness*, list 10 principles for building trust through community engagement. While originally developed for the medical community, many of these principles would apply to our industry. We know that nearly every community member seeks food that is safe, high-quality, desirable, and abundant. We can begin to understand those needs better through continuous engagement.

Lily Zheng describes this perfectly when they write about what diversity and inclusion really mean to people. No one believes that every single identity and background will be represented in every room. Our goal is to create rooms that, "all stakeholders, especially undeserved and marginalized populations, trust to be respectful and accountable." (Zheng 2023) It's not enough to add people of color or community members to a room to carry out the exact same plans as before. Instead, "it's *trust*, often achieved through representational parity but not always requiring it, that dictates whether we consider a given entity 'diverse.'" (Zheng 2023)

Shift our industry's focus away from charity and towards food justice. Many hunger relief organizations operate on a charity model, using language such as "less fortunate" for the people

seeking food. This power dynamic is unhealthy. It fosters an environment of us-versus-them that separates food pantries from their visitors. A culture of food justice starts with acknowledging food as a human right. “Food justice is a holistic and structural view of the food system that sees healthy food as a human right and addresses structural barriers to that right.” (FoodPrint 2021) Instead, we can work alongside community members to change the conditions of a systemically unequal society.

Funding

For many hunger relief organizations that receive EFAP funds, funding doesn’t cover all their expenses. EFAP receives funding through the legislature. That appropriation, even when increased, will always be finite. Therefore, we must prioritize funding for programs that are willing to expand their service offerings to meet the needs of more people. The stigma mindset begins with scarcity: organizations without the resources to care for community members may start to ration those resources. Limited funding can lead to fears about empty shelves and hungry families. If we want to address the scarcity mindset among our colleagues, we first need to address the scarcity itself.

Recommendations for the 2023-2025 biennium

Expand contractor funding for administrative activities. Contractors under EFAP can receive no more than 10% of an area’s funding to cover administrative costs. That cap may not be sufficient for an area with many subcontractors. WSDA should factor in administrative costs for larger regions, and allow supplemental funding to cover more of those expenses. We could also offer incentives for contractors to reach out to potential subcontractors in their area and help them prepare for the Spring Meeting or voting process.

Standardize data collection across the state. We can work together to advocate for the funding we need. One way to start is by making our new and returning client data consistent across the state. The contract defines new (unduplicated) clients as being counted on their first visit to the emergency food provider in the **current year as defined by the contractor**. Returning (duplicated) clients are counted when they return in the **current fiscal year**. (WSDA Food Assistance 2021) This mismatch creates confusion among food providers and may give us inaccurate statewide counts. Making client data questions consistent at each food pantry will tell a more complete story about food insecurity in Washington. Offer base-level funding for new organizations that meet EFAP qualifications but don’t collect the data needed to allocate funding to them. These funds could help prepare new organizations to receive a funding allocation in the next biennium.

Center clients’ needs in the data we collect and how we collect it. When we standardize the intake questions for new and returning clients, select the questions that are easiest for clients to understand. Consider adopting a question that asks clients if this is their first time visiting any Washington food pantry during this calendar year. Similarly, encourage regular review of the data that each HRO collects. A concise way of putting this might be, “if you’re not using it, don’t collect it.” If a funder asks for invasive or personal information, learn more about why they are asking for it. Is anyone using that data to improve the program or report on usage? If not, it’s worth asking why we trouble our clients and ourselves when collecting it.

EFAP does not require proof for any information that clients can self-declare. We can also give clients the opportunity to decline to provide that information to us. Add language to the intake process that guarantees to clients that their visits to another food pantry won't change how much food they receive that day.

Recommendations for the next biennium

Offer funding and incentives to food justice-oriented organizations. We should reward HROs that shift their programming to account for racial equity, nondiscrimination, community engagement, and the rejection of stigma among food pantry users. Before we can offer these incentives, we first need to establish standards in these categories. We must begin to develop these standards now so that organizations have time to update their practices for the next biennium.

Redesign how funds are allocated to counties and regions. EFAP currently distributes proportional funding to each region based on the number of people whose incomes are at or below 100% FPL. There are scores of people who could use food assistance whose incomes are above the poverty line. In fact, a study from 2019 showed that for many people, they or their families needed to earn at least 300% FPL before their food insecurity levels began to fall. (Bolt, et al. 2019) However, for people of color, their income needed to be at least 400% FPL before they saw similar food security improvements. (Bolt, et al. 2019) If people up to 400% are food insecure in many places in the state, we should start including them in our estimates for who may be accessing food assistance. At a minimum, begin by including those numbers in side-by-side county-level allocation comparisons. Make gradual increases to how we allocate funding beyond the 100% FPL calculation.

Redefine EFAP funds as belonging to a community, not an organization. The state legislature authorizes this funding to “be made available to assist local emergency food programs.” (Washington State Legislature 2010) I would reorient the program to award funding to communities and regions. When an EFAP-funded organization closes or loses its funding, that funding is often reallocated to other subcontractors in the area. This puts responsibility on local community members to travel to a pantry that is still open. If community-level funding belongs to the community, we could consider remaining funds as “startup costs” for a pantry or organization to replace lost services in that area.

Concerns of subcontractor territoriality came up often during my interviews. Existing subcontractors think of their portion of the funding they received in the last biennium as “their funding” in future years. This can make it harder for organizations to launch or expand their services in the same area, especially in a system where existing subcontractors vote for new subcontractors. We'll need further discussion within the food assistance network to reimagine how we allocate funds fairly across the state.

Recognize the true costs of food distribution. One reason food banks and pantries proliferate in the United States is because the cost of funding them is less than the cost of funding a social safety net. The Center on Budget and Policy Priorities found that programs like SNAP, the Earned Income Tax Credit, and rental subsidies—when fully funded—cut the poverty rate in half. The

estimated cost for these government programs in 2005 was \$365B in 2015 dollars. (Greenstein 2015) By contrast, the annual nationwide donation movement known as Giving Tuesday raised \$274M in 2017. (Philanthropy News Digest 2017) When we accept small grants to perform huge amounts of work, we sell short the impact that hunger relief has on people in our state. Propel Nonprofits offers a template and guide to help organizations calculate the true costs of their work. (Propel Nonprofits 2023)

Ongoing recommendations

Offset the impacts of removing service area restrictions. In 2020, WSDA Food Assistance published guidance clarifying the client intake requirements of their programs. The EFAP Procedures Manual states that, “client intake requirements are primarily based on client self-declaration (not documentation), removing service area restrictions, and actively engaging in stakeholder discussions that identify additional improvements in this area.” (WSDA Food Assistance 2021). These policy statements were valuable in removing unspoken documentation requirements. Service area restrictions likely kept community members from receiving food. However, EFAP funding is allocated by county-level poverty data. A food pantry in one county that sees a lot of clients from another county wouldn’t have access to that county’s funding. There may be additional impacts to the system that I haven’t noted here. Let’s consider alternate allocation methods for EFAP recipients. Above all, we must avoid a return to any policies (such as requiring personally-identifying information) that would limit community mobility or access to food.

Reorganize community-facing food assistance programs. WSDA Food Assistance programs cover many parts of the food system. Food Assistance programs fund farmers, processors, distributors, and direct-service providers. These programs sometimes overlap in their goals or eligibility requirements in ways that can be confusing to applicants. WSDA should organize the variety of programs into an understandable ecosystem of funding options. An organization serving one or more roles should know exactly which funding streams are meant for them and how they can apply.

Contracts

EFAP contracts came up repeatedly during my conversations with funding recipients. The contracts and procedures manual contain a lot of information and detail. Contractors and subcontractors alike may have a hard time reading or understanding what’s in their contracts. Many of the people I interviewed mentioned and praised the WSDA Food Assistance staff who helped them understand how to manage their contract requirements. Staff members offered training, advice, and guidance whenever needed. If we can spread that knowledge or remove confusion in the written materials, we will improve WSDA staff capacity to handle more complex issues. We can improve EFAP by making our documents and materials understandable and easy to read for all our partners.

Recommendations for the 2023-2025 biennium

Improve document readability. Review the definitions in contracts and procedures manuals. We can reduce the need for cross-referencing by including all definitions that are relevant to that document. Review feedback on those definitions to ensure all funding recipients understand their

meanings. Rewrite confusing or ambiguous definitions and phrases so they are easier to understand. We have a wide variety of backgrounds, education levels, comfort reading business-level English, and more. People will be more likely to follow contract requirements when we present them with clarity and explain why they exist.

Recommendations for the next biennium

Update civil rights / nondiscrimination training requirements. Expand the civil rights training requirement for all EFAP recipients, their staff, and volunteers. Oregon Food Bank offers a civil rights video in English and Spanish, with accompanying brochures, that is suitable for volunteers and staff. (Oregon Food Bank 2020) The materials cover protected classes, nondiscrimination, how to handle nondiscrimination at a food pantry, and more.

Update the grievance policy. Our current contract includes a requirement that each recipient have a grievance policy. Update that policy to be even more client-centered. List potential issues that warrant a grievance, such as potential discrimination or other unfair treatment at that site. If a client has an issue with someone at a food bank, where should they report it? If that issue is with the food pantry itself, include contact information for the contractor and WSDA staff. Develop a reporting system that tracks grievances and seeks correction at any level.

Ongoing recommendations

Continue applying plain language principles to all public-facing EFAP documentation. Plain language is not only easier to read in English, it's easier to translate and interpret as well. This is a worthy investment in our program.

Spring Meeting

People's experiences at the Spring Meeting vary across the state. Spring Meetings are a time for all EFAP recipients in a region to come together, whether virtually or in person. Though the variety is valuable at the local level, standardization would help streamline the experience for all participants.

Recommendations for the 2023-2025 biennium

Define service duplication. Concerns about service duplication present a barrier to expanding the pool of EFAP subcontractors providing direct services. Many regions use geography and hours of operation to determine whether a new HRO is duplicating services. There could be other reasons why community members might choose to visit one food pantry over another. Start by asking for hours and days of operation from all entities that receive EFAP funding or food. Use that information in future biennia to encourage diversifying service hours to better meet the needs of their community.

Standardize Spring Meeting process. Share templates for Spring Meetings that include the essential items that each region must report on. Provide space to write justifications on critical decisions, especially around allocation and funding decisions. Empower WSDA Food Assistance staff to review Spring Meeting minutes for all regions and ask probing questions on decisions that are unclear or unfair.

Recommendations for the next biennium

Develop a dialogue process for EFAP applications. Power imbalances are baked into a system where funding decisions for EFAP applicants are made at a single meeting. Voting in new EFAP recipients can be a lengthy process. Applicants must prepare a presentation about their services, but they don't receive much guidance on what to include. Before the Spring Meeting, voting members should develop or adopt WSDA guidelines for what a presentation should include. Applicants should receive this information in advance and be given time (2+ weeks) to prepare. Alternately, two or more subcontractors could meet with an applicant to help them prepare for the presentation.

Develop a process that grants applicants greater participation in a region's decision-making. For instance, when a new organization does not receive EFAP funding they requested, ask subcontractors to give applicants a justification for their decision. Allow those applicants to respond to the decision before it is final. Create a process of appeals for organizations who feel they are unfairly denied funding.

Begin some Spring Meeting decisions early. Consider changing to how we view the Spring Meeting process. Presentations and voting don't have to happen on the same day. Voting itself does not need to happen at the Spring Meeting. One subcontractor I spoke to told me their region plans and discusses Spring Meeting topics at regular meetings before the Spring Meeting takes place. This allows more time for discussion and fact-finding before decisions are made. Food pantries, even ones who don't currently receive EFAP funding, are part of our fight to end hunger in Washington. We can do right by our community members as we hold each other accountable.

Help contractors find new potential EFAP partners. Some contractors I interviewed said it was hard to know which hunger relief organizations were active in their region. We could create a database of hunger relief organizations that don't currently receive EFAP funding. Ask contractors to invite those partners to consider joining EFAP.

Conduct visioning and strategy at Spring Meetings. The Spring Meeting is a time when existing EFAP-funded HROs convene to make decisions about future funding in their region. Future meetings could be an opportunity for strategy and visioning conversations with those regional partners. What if the Spring Meeting served as idea incubators, mini-conferences to share ideas and be more responsive to our neighbors in need?

- What is the state of food security in our area?
- What challenges do we see on the horizon?
- What recent innovations have emerged in our region?
- How could we work with surrounding county/region leaders to promote a more widespread understanding of food insecurity challenges in our part of the state?
- What advocacy priorities and activism could we support at the regional, state, or national level?

What if the focus of the Spring Meeting focused on dismantling systemic oppression and promoting food justice in our state or country? The possibilities are endless.

Ongoing recommendations

Expand who can vote at Spring Meetings. We currently limit voting to contractors and subcontractors. Consider giving a vote to every organization in a region that receives support from EFAP. In future years, consider transitioning all votes to community members and people who currently access food assistance. This idea needs deeper discussion with more members of the food assistance network given the following recommendation.

Balance power dynamics present at the Spring Meeting. Spring Meetings can be dominated by subcontractors that already have a vote in the system. It doesn't matter if this dominance is intentional: scarce funds can make this power dynamic difficult for new organizations to navigate. They can create a situation where people who are new to food assistance may not receive a fair share of funding for their work. It can lead to people feeling squeezed by allocations: they may receive too much funding (at the expense of other partners) or too little. We have a system where people who have been around a long time, or are used to getting a certain level of funding, can be suspicious of newer food pantries.

Another issue is how we allocate votes by region. Some regions vote to award a vote to every site that operates in their county. Others vote to award one vote per 501(c)(3) organization. We may want to consider a cap on voting so that no organization controls more than 50% or 40% of the total vote in their region.

How can we ensure that familiar power dynamics aren't upheld in the Spring Meeting? How do we prevent undue influence by larger and well-funded organizations? We should center the voices and input from people with lived experience of food insecurity.

Allocations

Allocations at the Spring Meetings are left entirely up to contractors and subcontractors in each region. Different regions handle allocations differently. In some areas, contractors present allocations sheet that subcontractors approve immediately. In other areas, allocations begin with last biennium's allocation, or a few different models for review. And for some regions, allocations are a multi-hour or multi-day process, with voters tweaking percentages until everyone is happy.

This flexibility may feel like freedom, but it's not. Without statewide guidance and standards for consistency, most regions tend to make minor changes to the allocation plan they chose last biennium. This prevents us from thinking about the outcomes of the funding we receive, such as:

- Are our hunger relief efforts working?
- Have we created more/less food security in our region?
- Do people in our community know where they can go for food?
- What efforts have we made to cater our services to marginalized or oppressed communities?
- Are we removing discriminatory policies present (intentional or not) at our food banks and pantries?
- Do members of the community feel represented in and supported by the decisions we make?

- Do people feel dignified when they visit us? Why or why not?
- For all of these questions: how do we know?

We can standardize our allocation practices while offering regions the flexibility they need to make funding decisions.

Recommendations for the 2023-2025 biennium

Collect information about how each region allocates funding. From my research, I learned that some regions give each subcontractor an equal amount of funding. Others give funding proportional to the number of client visits each subcontractor receives. Others offer a combination of base funding plus proportional funding. There could be other ways to allocate funding.

During the coming biennium, perhaps after the Spring Meetings take place in 2023, we should learn more about how every region handles their allocation:

- What allocation model do they use?
- Why did voters choose this one?
- Do voters compare multiple allocation models? Do they choose the first one that receives at least 2/3 of the votes, or do people find consensus before they vote?
- Do voters spend any time prior to the Spring Meeting choosing an allocation model?
- Did the region start with an allocation formula from an earlier biennium? Do they start from scratch every time?
- Who requested funding this year? Who received funding?
- What method did voters use to decide the amount to allocate to each program?

This information will help us better understand the variety of models that already out there.

Recommendations for the next biennium

Offer a menu of allocation models that regions can select. These standardized allocation templates will make it easier to understanding funding decisions across the state. Each region can use one of these models or request approval of their own model. WSDA should reserve the right to review each region's allocation plan and return it for reworking if necessary. They may ask a region to revise an allocation plan that is unfair or discriminatory. Allocation plans should include the amount requested by each EFAP recipient, the amount proposed, and the justification—why was this plan chosen? All applicants and participants should know on what they can do if a decision was made unfairly or based on incomplete/inaccurate information.

Some example allocation plans:

- Equal base funding to all partners in a region
- Base funding + funding proportional to visits (list percentages)
- Base funding + dietary needs food purchasing that benefits all recipients
- Bonus allocations for organizations that implement pro-equity or antiracism improvements

Ongoing recommendations

Encourage approval by consent, not consensus. Our current voting system requires a 2/3 vote to approve a decision. This means that 1/3 of participants can be unhappy with the allocation plan but have no recourse. Consider [consent decision making](#), where a group seeks to overcome all objections to a proposal before it's approved. Ted Rau of Sociocracy for All describes the difference between consensus and consent: "one could say that in consensus, we ask everyone 'do you agree?'. In consent, we ask 'do you object?'" (Rau n.d.) Consent decision making helps equalize the power of the majority, which is often white dominant and enforcing of the status quo.

Provide a path to resolve conflicts. When a conflict does arise, contractors or subcontractors may look externally to help mediate that conflict. As the governing body for food assistance, that may not be a position that WSDA or the Food Assistance team feels comfortable handling. Not handling this conflict, however, could have lasting ramifications for how we all work together. Instead, WSDA could assist with referring conflicts to a local [Dispute Resolution Center](#). The state legislature authorized the creation of Dispute Resolution Centers (DRC) in 1984; there's at least one DRC in nearly every county. (Washington State Administrative Office of the Courts n.d.) DRC staff are community-based facilitators who can help people create solutions to the conflicts they have together.

Training

Training came up in nearly every conversation I had about EFAP. Staff turnover is a particularly pressing issue across the state. Many contractors and subcontractors are new to the EFAP process, especially the parts of EFAP that happen only once every two years. Even for people who are familiar with the program, a regular training would be helpful to explain new guidelines, changes in the contract or manual, or tips for implementing antiracist practices at individual sites.

Recommendations for the 2023-2025 biennium

Offer trainings for all EFAP funding recipients. Every organization that receives EFAP funding should participate in a training that's relevant to their role. This would include contractors, subcontractors, food bank distributors, and organizations interested in applying for EFAP. The trainings may overlap. For instance, we could develop a single training applicable to both contractors and food bank distributors. Potential training topics could include (these are drawn from interviews):

- For all recipients:
 - Overview of EFAP
 - Changes to the program since the last biennium
 - What funds can/can't be used for, with real-world examples recipients may not know about
 - Explaining the difference between operational costs and capital expenses
 - Navigating the WSDA FA Forms page
 - Civil rights, racial equity, and handling discrimination issues
 - Where to go if you have questions

- For contractors:
 - Reimbursement voucher and reimbursement process from start to finish
 - Reviewing and approving subcontractor receipts
 - Close-out process for all funds at the end of the year
 - Subcontractor audit process and what to look for
 - Leading the Spring Meeting
 - Grievance process and how to follow up (either from a client or pantry)
- For subcontractors:
 - Reimbursement voucher and submitting receipts for reimbursement
 - How to collect necessary intake data for EFAP (and how to extract the data from popular intake systems)
 - How to create and submit reports
 - How to support volunteers and staff in client dignity and handling discrimination issues
- For EFAP applicants:
 - Eligibility requirements
 - WSDA expectations and activities required to receive funds
 - How to collect intake data
 - What voters will be looking for from a new applicant

Some contractors already offer trainings that cover many of these items. A statewide training could support contractors who haven't had the capacity to create trainings.

The people I interviewed shared that they would be comfortable if the trainings were made mandatory for all recipients to complete before the Spring Meeting (or before voting). Training materials could be recorded for people who can't attend the training sessions. Printed reference materials such as one-pagers were also suggested.

Recommendations for the next biennium

Expand training options. Provide contractors with an easy-to-follow curriculum so they can onboard people new to EFAP between formal trainings. Track staff turnover at the pantry level and orient new EFAP leaders into the program within their first month of joining the organization.

Ongoing recommendations

Expand collaboration and sharing networks across the state. Who in the state shares our interests and goals? Who are the industries connected to ours? Our trainings could be applicable or exchangeable with other industries. We could exchange ideas more often than an annual conference. We could put on workshops or offer trainings for folks who are new to food assistance. We can educate ourselves on food justice and share what we learn with our colleagues.

Conclusion

It's been 38 years since the Emergency Food Assistance Program began in Washington state. A lot has changed since that time. In my conversations, and in my own experience, the food assistance system is not where we need it to be. EFAP is a small but valuable part of that system. Our improvements here will expand and grow outward to improve the lives of people around us.

So many of us got into hunger relief to respond to a need—we don't want our neighbors to go hungry. That need has evolved. More people than ever need food. They deserve to receive that food in humanizing and stigma-free ways. The problems we face are not EFAP's problems alone, or even WSDA Food Assistance's problems to solve. But we are not without power. If we have the ability to act, I believe we must.

Next Steps

My goal in writing this report was to open up new possibilities for EFAP and Food Assistance. The status quo is durable in most systems. It's very tempting to go along with what's been done before. I see these instances as missed opportunities for improvement. Upholding the status quo can also be dangerous, given what we know about the racist or unfair systems around us. If everyone went with what's been done before, our decisions may go back decades, back to when those rules intentionally excluded or segregated Black people, Indigenous people, and people of color. We can't allow these rules to stand.

For everyone who works in food banking or a connected industry, we need your help to carry out these changes. You know the systems you're in better than anyone. You know the nuances and limitations of how they work. We have to use the knowledge we have to make things better for everyone—especially people who have long been wronged by the systems all around us.

For WSDA Food Assistance Team

I invite you to review these recommendations and appraise the programs you manage. Think about where and how to implement these and other ideas with a push towards racial justice. Understand which require review, or which programs are connected to other programs in ways that aren't clear to me. How could these recommendations roll up to all food assistance programs?

For members of the Food Assistance Advisory Committee and Client Intake Subcommittee

Engage with food banks who aren't regularly connected to the work of the FAAC. How would they implement these recommendations? How can we expand these recommendations to involve more of our members? How can our advisory committees include more community representation? How can we advance community engagement throughout the state?

For all people connected to hunger relief organizations

(visitors, clients, shoppers, staff, volunteers, community members, and leaders)

Are these recommendations ambitious enough? If WSDA and others adopted these recommendations, in whole or in part, what would you need help with? Who is already putting some of these recommendations into practice at the local level? Who can we learn from as we continue this work together? Ask yourself these questions and share your answers with the people and leaders around you.

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