



Survival Coalition

of Wisconsin Disability Organizations

P.O. Box 7222, Madison, Wisconsin 53707

DATE 10/17/17

TO: Assembly Committee on Public Benefit Reform
FR: The Survival Coalition of Wisconsin Disability Organizations

RE: Opposition to Assembly Bill 530, nutritional food pilot program under FoodShare

Chairperson Krug and Assembly Committee on Public Benefit Reform Members:

The Survival Coalition of Wisconsin Disability Organizations is comprised of over 30 statewide groups representing people with all disabilities and all ages, their family members, advocates and providers of disability services. We would like to bring to your attention some very important concerns regarding Assembly Bill 530 that we believe will significantly impact people with disabilities.

FoodShare is an important program for people with disabilities. According to the Department of Health Services, 25% of FoodShare recipients are either elderly, blind, or have a disability; and 46% of households receiving FoodShare benefits contain at least one individual that is, either elderly, blind, or has a disability.

AB 530 would limit the types of foods that may be purchased using FoodShare benefits. AB 530 would allow the Department of Health Services to create a pilot program to “restrict” the use of FoodShare benefits on specific non-nutritional foods or beverages. It is unclear if the use of “restrict” would result in a limit on the types of foods a person could buy or an all-out ban on “unhealthy food.” It is also unclear from the bill language where the liability for not meeting these new requirements would lie or what, if any, punitive measures would be taken against individual recipients that do not meet the new standards. We have strong concerns that AB 530 could result in people with disabilities losing access to food if they are unable to meet technical and complex criteria for using FoodShare benefits.

This bill creates extra barriers for individuals with disabilities attempting to access FoodShare benefits. In addition to applying for benefits and locating/finding transportation to a grocery store, individuals with disabilities would now be required to ensure that the foods they purchase meet specific nutritional criteria.

While we appreciate that this bill requires stakeholder involvement in the development of this new pilot program, we still have concerns about crafting a definitive list of foods that are not allowed for FoodShare recipients. Foods contain many components that can affect health, and healthy diets contain many foods. As a result, it is challenging to determine whether – and the

point at which – the presence of desirable nutrients outweighs the presence of nutrients to be avoided in ruling a food “in” or “out.” This could be particularly difficult to ascertain with some pre-packaged foods, which can be of particular need for people with disabilities. Some people with disabilities due to their physical or intellectual limitations have difficulty or cannot prepare entire meals “from scratch” but can independently utilize pre-packaged food items or items that can be microwaved. We believe this bill could jeopardize the autonomy of people with disabilities by making it more difficult for them to prepare meals independently.

A higher percentage of people with disabilities are of lower income and, therefore, more often live in “food deserts.” A “food desert” is an area with little or no access to large grocery stores that offer fresh, healthy and affordable foods--- foods that will most likely be “authorized” by AB 530. Instead of such stores, these urban and rural areas often contain only fast food restaurants and convenience stores. Physical access to large grocery stores can be difficult for people with disabilities of low incomes, particularly if the stores are distant, the store is not on a bus line, or if the consumer has no vehicle. Carrying fresh food from grocers can also be a challenge for individuals who must take public transit, walk long distances, or have other physical limitations.

Finally, many people with disabilities are on special diets that may or may not align with the traditional nutrition guidelines. For instance, people with PKU and some types of seizure disorders must eat high-fat or even exclusively-fat diets. People on gluten-free diets, which are sometimes recommended for children with autism, can only use very limited grain products. AB 530 does not take into account any specialized diets that people may adhere to for medical reasons.

Achieving dietary improvements among FoodShare recipients is a complex challenge and people with disabilities who utilize FoodShare have additional considerations that make this proposed legislation concerning Survival Coalition supports legislation that works to address barriers to healthy food access, such as Assembly Bill 501. We cannot support AB 530 because we believe it creates barriers to accessing food. In addition, this bill would likely increase administrative costs for the Department of Health Services at a time when there are documented provider shortages throughout the health care community, which require additional funding to address. We believe that any additional state funding should be used to provide services directly to beneficiaries of FoodShare or other health care programs.

We ask that you oppose AB 530.

Thank you.

Sincerely,

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