American Public Human Services Association

1300 17TH STREET NORTH, SUITE 340, ARLINGTON, VA 22209 TEL (202) 682-0100 FAX (202) 204-0071 WWW.APHSA.ORG

June 28, 2021

Deputy Under Secretary Stacy Dean
United States Department of Agriculture
Food and Nutrition Service
130 Braddock Place Ste. 200
Alexandria, VA 22314

Dear Deputy Under Secretary Stacy Dean:

At the American Public Human Services Association (APHSA) we believe in thriving communities built on human potential. Access to desirable and adequate food and nutrition is an essential step toward achieving this vision. As the bipartisan, national membership association representing state and local health and human services agencies, we believe that an integrated approach that looks at how food and other foundational supports interact is critical to support the well-being of people and communities. As USDA considers the current state of the Thrifty Food Plan (TFP), we urge the administration to take action based on evidence of what works, centered on our understanding of food as a social determinant of health and the historical and current structural inequities in food access in our country.

Investments in Food and Nutrition Are Investments in Health and Well-Being

Bolstering nutrition supports provides both an immediate return on investment and a down payment for future health and well-being. After the 16% SNAP increase authorized in the American Recovery and Reinvestment Act of 2009 (ARRA), food insecurity for low-income households fell by 2.2%.[1] When we reduce food insecurity, people are less likely to suffer from chronic illnesses such as Type 2 Diabetes, hypertension, high cholesterol, and heart and kidney disease, as well as poorer general and mental health.[2] Consequently, actions to reduce food insecurity have a direct impact on healthcare spending; adults with higher food insecurity are 47% more likely to visit the emergency room and spend 54% more days in the hospital.[3] Compared to non-SNAP recipients, adults in SNAP households are shown to report better health outcomes and a reduced likelihood of nursing home and hospital visits. These better long-term health outcomes are also found for future generations of children who receive SNAP, in addition to higher educational attainment compared to their peers that were not in SNAP households.[4]

These data reinforce what we innately know to be true: when we remove the physical, mental, and financial stress of not knowing how you will be able to provide enough healthy and desirable food on the table for your family, we return power back to people to live their lives to their fullest potential. Yet, the evidence is clear that the current Thrifty Food Plan is inadequate to wholly address this need. While SNAP is proven to significantly reduce

[1] Mark Nord and Mark Prell. *Food Security Improved Following the 2009 ARRA Increase in SNAP Benefits*. USDA Economic Resource Service. April 2011. https://www.ers.usda.gov/publications/pub-details/?pubid=44839
[2] Steven Carlson and Brynne Keith-Jennings. *SNAP Is Linked with Improved Nutritional Outcomes and Lower Health Care Costs. Center on Budget and Policy Priorities*. January 17, 2018. https://www.cbpp.org/research/food-assistance/snap-is-linked-with-improved-nutritional-outcomes-and-lower-health-care
[3] Seth A. Berkowitz, Hilary K. Seligman, and Sanjay Basu. *Impact of food insecurity and SNAP participation on healthcare utilization and expenditures*. University of Kentucky Center for Poverty Research. 2017. https://uknowledge.uky.edu/cgi/viewcontent.cgi?article=1105&context=ukcpr_papers
[4] Steven Carlson and Brynne Keith-Jennings. *SNAP Is Linked with Improved Nutritional Outcomes and Lower Health Care Costs. Center on Budget and Policy Priorities*. January 17, 2018. https://www.cbpp.org/research/food-assistance/snap-is-linked-with-improved-nutritional-outcomes-and-lower-health-care

food insecurity and food hardship, it still leaves the majority of recipients food insecure.[5] In research just released by USDA, 88% of SNAP participants reported facing at least one barrier to achieving a healthy diet throughout the month, with the most common barrier (reported by 61% of SNAP participants) being the affordability of healthy foods such as lean meat and fresh fruits and vegetables.[6] Additional barriers included access to transportation and distance to grocery outlets, time needed to shop for and prepare food, and space to store food. Research has shown that when SNAP benefits are increased, food expenditure increases, and when SNAP benefits are decreased, such as after the expiration of the SNAP benefit increase from ARRA, food expenditure again reverts, decreasing affordability of a healthy diet.[7]

Improvements to the Thrifty Food Plan Should Address Longstanding Disparities in Food Access and Insecurity

Food insecurity inequitably affects communities of color, who across the country have disproportionately less access and choices for food and nutrition that meet the needs of their families. In 2019, Black and Hispanic households faced an average of 19% and 15.6% food insecurity, respectively, compared to the national average of 10.5%.[8] This disparity has only been exacerbated in response to the COVID-19 pandemic, where 40% of Hispanic/Latinx and Black families experienced food insecurity in September 2020, compared with a rate of only 15% in white families.[9] Federal nutrition COVID policy responses, including expansion of Emergency Allotments, the temporary increase in SNAP benefits, and Pandemic EBT, have all contributed to a significant decrease in food insecurity over the past several months. Yet, in April 2021, Black and Hispanic/Latinx households still faced food insecurity at twice the rate of white households (20%, 26%, and 12%, respectively).[10] We witness these same disparities across health outcomes related to food and nutrition security. In 2017–2018, the CDC found that 50% of Black adults and 45% of Hispanic adults faced obesity, compared to 42% of white adults.[11] Similarly, the rates for Type 2 Diabetes were 15% for American Indians/Alaska Natives, 12.5% for Hispanic adults, and 12% for Black adults, compared to 7.5% for white adults.[12] We must also understand varying levels of access in regard to the build environment, including proximity to grocery outlets and available transportation. A study of four metro areas found that due to ongoing effects of discriminatory housing practices, people of color continue to face less access to safe and affordable transportation.[13] It is undeniable that the root causes of hunger and food insecurity are linked with social and environmental contexts, and disproportionately affect people based on their race and access to resources in society.

These inequities are reflected in the current design of the Thrifty Food Plan, and we urge USDA to take proactive steps in its updates to break down barriers that have been placed on communities of color in accessing food over the past generations. Specific aspects of the Thrifty Food Plan that should be revisited with an equity lens include, but are not limited to, the following:

- **Foods and diets that the TFP is based upon** – The current basket used to create the TFP includes westernized foods that do not accurately represent the typical diets of many people who utilize SNAP.

---

[5] Caroline Ratcliffe and Signe-Mary McKernan. *How Much Does SNAP Reduce Food Insecurity?* USDA Economic Research Service and Urban Institute. April 2010. https://www.ers.usda.gov/publications/pub-details/?pubid=84335

[6] USDA Food and Nutrition Service. *Barriers that Constrain the Adequacy of Supplemental Nutrition Assistance Program (SNAP) Allotments.* June 23, 2021. https://www.fns.usda.gov/snap/barriers-constrain-adequacy-snap-allotments

[7] Steven Carlson. *More Adequate SNAP Benefits Would Help Millions of Participants Better Afford Food*. Center on Budget and Policy Priorities. July 30, 2019. https://www.cbpp.org/research/food-assistance/more-adequate-snap-benefits-would-help-millions-of-participants-better

[8] Alisha Coleman-Jensen, Matthew P. Rabbitt, and Christian A. Gregory. *Food Insecurity by Household Characteristics.* USDA Economic Resource Service. March 12, 2021. https://www.ers.usda.gov/topics/food-nutrition-assistance/food-security-in-the-us/key-statistics-graphics.aspx#householdtype

[9] Poonam Gupta, Dulce Gonzalez, and Elaine Waxman. *Forty Percent of Black and Hispanic Parents of School-Age Children are Food Insecure*. Urban Institute. December 8, 2020. https://www.urban.org/research/publication/forty-percent-black-and-hispanic-parents-school-age-children-are-food-insecure

[10] Elaine Waxman and Poonam Gupta. *Food Insecurity Fell Nearly 30 Percent between Spring 2020 and 2021*. Urban Institute. May 26, 2021. https://www.urban.org/research/publication/food-insecurity-fell-nearly-30-percent-between-spring-2020-and-2021

[11] Craig M. Hales, Margaret D. Carroll, Cheryl D. Fryar, and Cynthis L. Ogden. *Prevalence of Obesity and Severe Obesity Among Adults: United States, 2017-2018*. Centers for Disease Control and Prevention, National Center for Health Statistics. February 2020. https://www.cdc.gov/nchs/products/databriefs/db360.htm

[12] Centers for Disease Control and Prevention. *National Diabetes Statistics Report, 2020*. Centers for Disease Control and Prevention, U.S. Dept of Health and Human Services. 2020. https://www.cdc.gov/diabetes/data/statistics-report/diagnosed-diabetes.html

[13] Christina Stacy, Alenda Stern, Kristin Blagg, Yipeng Su, Eleanor Noble, Macy Rainer, and Richard Ezike. The Unequal Commute. Urban Institute. October 6, 2020. https://www.urban.org/features/unequal-commute

American Public Human Services Association

1300 17TH STREET NORTH, SUITE 340, ARLINGTON, VA 22209 TEL (202) 682-0100 FAX (202) 204-0071 WWW.APHSA.ORG

- **Access to full-service grocery stores** – Across the United States, there are large inequities in the availability of healthy food retail, with significantly less full-service grocery stores in majority-Black or Hispanic communities compared to neighboring white communities.[14] The lack of available options exacerbates the need for safe and affordable transportation and account for time and money for people to travel to purchase food.
- **Availability, variety, and price disparities of food** – Relating to the lack of grocery options, people who live in areas with less full-service grocery retailers also have significantly reduced options, especially in food categories that are encouraged in the Dietary Guidelines for Americans, such as fresh fruits and vegetables, whole grains, and lean meats. These healthier options also tend to be more expensive in areas with less food access, including rural communities.[15]

Changes to the Thrifty Food Plan Present a Tremendous Opportunity to Build a Stronger, More Equitable Society

We know that when nutrition needs are met and hunger is not an additional stressor, families can better focus on what they need to thrive, promoting well-being across people and systems. To move health and human services upstream, we must recognize and acknowledge the interconnectedness of nutrition and food security with comprehensive health and well-being. When families do not have to worry about whether they will be able to put food on the table tonight or at the end of the month, they are able to better work to strengthen other building blocks that are needed to thrive, such as finding safe and affordable housing, childcare, and attaining gainful employment. As a critical social determinant of health, increasing access to affordable, sufficient, culturally appropriate, and desirable food can make a significant impact in advancing an equitable nation that promotes well-being for families and communities.

Thank you for your continued efforts to work towards a food system that meets the immediate and long-term needs of children and families. We look forward to working together on increasing food security in the coming months. Please reach out to Matthew Lyons at mlyons@aphsa.org with any questions or further discussion.

Sincerely,

Duke Storen

Chair, APHSA Leadership Council
Commissioner, Virginia Department of Social Services

Belit Burke

Chair, American Association of SNAP Directors
Strategic Integrated Policy Administrator
Oregon Department of Human Services

Matthew Lyons

Director, Policy and Research
American Public Human Services Association

[14] The Food Trust. *The Grocery Gap*. 2012. http://thefoodtrust.org/administrative/hffi-impacts/the-grocery-gap
[15] Lisa M. Powell, Zhenxiang Zhao, and Youfa Wang. *Food Prices and Fruit and Vegetable Consumption Among Young American Adults.* December 2009. https://www.sciencedirect.com/science/article/pii/S1353829209000513?casa_token=IUk9Z0J8nFYAAAAA:lnld4iSQUU6kn-WEm2btnM7dchl02-3NzD0gi5MwcKNCvZ1MyzRuolLs0K-SzqFmoMAs5-IdxA