

July 15, 2021



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*Re: Identifying Barriers in USDA Programs and Services; Advancing Racial Justice and Equity and Support for Underserved Communities at USDA (USDA-2021-0006)*

Dear Ms. Archuleta:

The Academy of Nutrition and Dietetics (the “Academy”) appreciates the opportunity to submit comments to the United States Department of Agriculture in response to its comment request for “*Identifying Barriers in USDA Programs and Services; Advancing Racial Justice and Equity and Support for Underserved Communities at USDA (USDA-2021-0006)*”. Representing over 112,000 registered dietitian nutritionists (RDNs), nutrition and dietetic technicians, registered (NDTRs), and advanced-degree nutritionists, the Academy is the largest association of food and nutrition professionals in the United States. We are committed to accelerating improvements in the nation’s health and well-being through food and nutrition.

**The Academy of Nutrition and Dietetics applauds USDA’s efforts to examine barriers in USDA programs and services in order to advance racial justice and equity. This comment provides recommendations to improve the reach of many USDA programs to better serve communities of color.**

#### **A. Health Equity Position and Social Determinants of Health**

The Academy of Nutrition and Dietetics recognizes it is essential to address the root causes of health inequities by examining the social determinants of health that play a role in the etiology and amplification of chronic health disparities. These root causes of health disparities must be addressed to achieve health equity. The Academy, in partnership with other allied organizations, will continue to promote and advocate for policies and programs that are aimed at improving these social determinants, from access to health care and education funding to food security and medical nutrition therapy.<sup>1</sup>

The most recent U.S. Census reports that approximately 40% of the U.S. population belong to a racial or ethnic minority group. Many minority populations in the United States have long faced chronic disease health disparities due to socioeconomic inequities, barriers to education, systemic racism, insufficient access to health care, as well as limited access to healthful and

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<sup>1</sup> Academy of Nutrition and Dietetics. “Racial and Ethnic Health Disparities and Chronic Disease Issue Brief.” [https://www.eatrightpro.org/-/media/eatrightpro-files/advocacy/legislation/racial-and-ethnic-health-disparities-and-chronic-disease\\_january2021.pdf?la=en&hash=B06FD71CC82FA1E6611F2994BE3D73501DDACDB0](https://www.eatrightpro.org/-/media/eatrightpro-files/advocacy/legislation/racial-and-ethnic-health-disparities-and-chronic-disease_january2021.pdf?la=en&hash=B06FD71CC82FA1E6611F2994BE3D73501DDACDB0). Accessed July 15, 2021.

affordable foods and safe places to be active. The historical practice of redlining and subsequent racial segregation across the country that remains today also impacts economic stability, educational access, as well as neighborhood and built environment. These systemic inequities contribute to racial disparities in chronic diseases such as cardiovascular disease, hypertension, diabetes, some cancers and obesity.<sup>2</sup>

The Academy is committed to improving the health of Americans by ensuring access to a nourishing, safe and affordable food supply. The dietetics practitioner and nutrition educators consider the health, safety and welfare of the public at all times. The Academy's guiding principle is our commitment to improving health for all, especially those most susceptible to food insecurity. It is the position of the Academy that systematic and sustained action is needed to achieve food and nutrition security in the United States. To achieve food security, effective interventions are needed, along with adequate funding for, and increased utilization of: food and nutrition assistance programs; inclusion of nutrition education in such programs; strategies to support individual and household economic stability; and research to measure impact on food insecurity and health related outcomes.<sup>3</sup>

**The USDA is uniquely positioned to address multiple social determinants of health by improving policies and programs to better reach underserved communities through the Supplemental Nutrition Assistance Program, SNAP Education and EFNEP, Gus Schumacher Nutrition Incentive Program, the Special Supplemental Nutrition Program for Women, Infants, and Children, school meals and commodities to ensure communities of color have access to healthy, safe and culturally-appropriate food.**

## **A. Supplemental Nutrition Assistance Program**

### *1. Thrifty Food Plan Update*

The Academy is concerned about the long-standing health disparities experienced by communities of color and illuminated by the disproportionate impact the COVID-19 pandemic has had on these communities, who were already far more likely to experience food insecurity. The Academy believes **increasing the SNAP benefit is a critical strategy to address health disparities – a direct result of systemic racism that has limited access to healthy food for communities of color.**

**The Academy supports an update, done with a cultural humility lens, to the Thrifty Food Plan, which is the basis for determining SNAP allotments.** During an informal Thrifty Food Plan listening session with members from the Academy of Nutrition and Dietetics one member said, “I see the challenges Oklahoma tribal communities have in accessing affordable and culturally appropriate, nutritious foods. Traditional foods such as hominy, wild rice, blue cornmeal, and bison, just to name a few, are not accessible or affordable and often sold in

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<sup>2</sup> Academy of Nutrition and Dietetics. “Racial and Ethnic Health Disparities and Chronic Disease Issue Brief.” [https://www.eatrightpro.org/-/media/eatrightpro-files/advocacy/legislation/racial-and-ethnic-health-disparities-and-chronic-disease\\_january2021.pdf?la=en&hash=B06FD71CC82FA1E6611F2994BE3D73501DDACDB0](https://www.eatrightpro.org/-/media/eatrightpro-files/advocacy/legislation/racial-and-ethnic-health-disparities-and-chronic-disease_january2021.pdf?la=en&hash=B06FD71CC82FA1E6611F2994BE3D73501DDACDB0). Accessed July 15, 2021

<sup>3</sup> Holben, D. (2010). Position of the American Dietetic Association: Food Insecurity in the United States. *Journal of the American Dietetic Association*. 110(9), 1368-1377.

specialty stores that may not accept SNAP benefits or participants have to travel long distances to find them in larger grocery stores.” Another Academy member explained that, “The TFP weaknesses are exacerbated by a range of other inequities such as: less public transportation for people of color and higher costs of transportation to stores; the cap in SNAP on the deduction of high shelter costs from countable income presumably disproportionately harms families of color who pay more than white families for the same shelter; as a result, the amounts of cash the SNAP system assumes are available for food are unreasonable generally, but more so for people of color. The greater amounts of work under more tiring conditions for low-paid workers, means that, on average, people of color work more and harder for the same amount of money as whites, making the shopping and preparation time assumptions of TFP even more unreasonable for them.”

## 2. *SNAP Online Access*

During the COVID-19 pandemic, many low-income families were forced to decide between eating and exposing themselves to the virus. Although large grocery chains were able to quickly get online options up and running, it still remained a challenge for some low-income families to use their benefits whether it be because they could not afford transportation fees or they lived in areas where large grocery chains were not able to deliver. As these gaps in service will continue to disproportionately impact communities of color, the Academy urges USDA to examine what more can be done to support cost of transportation and technical assistance to smaller grocers and stores without the capacity to fully utilize the SNAP online option. **Additionally, SNAP-Ed and EFNEP providers are a critical resource within vulnerable communities to help recipients and providers develop solutions to access issues. USDA should maximize the utility of these trusted providers and fund nutrition education programs at sufficient levels.**

## 3. *Funding CNPP to Support TFP Routine Review*

Additionally, during the Academy’s member discussion about the TFP, member experts in research expressed concerns that USDA may not have access to or the resources to conduct new research or analyze existing data to properly understand cultural and racial considerations for the Thrifty Food Plan review to update market baskets. One member shared that, “To update the TFP, it is imperative to look at lists of foods that are most frequently consumed by culturally diverse communities. The current method of determining the frequently consumed food lists does not account for cultural relevance.” Another Academy member suggested that, “USDA should get more granular on SNAP participant profile demographics such as age, household size, race/ethnicity, cost of food in specific areas, health issues/prevalence of different special diet conditions in those populations. It is important to build into TFP what foods and costs are needed by those populations for each market basket. For example, the new *Dietary Guidelines for Americans* have different types of meal patterns such as Mediterranean and vegetarian. Those meal patterns should be adapted for different racial and ethnic groups.” **The Academy urges USDA to provide additional annual funds to support CNPP’s research and data collection to support routine updates to the TFP.**

## **B. Gus Schumacher Nutrition Incentive Program**

The Academy urges USDA to prioritize programs like GusNIP that provide access to fruits and vegetables especially in high need communities. The Double Up Food Bucks program, created in Michigan by the Fair Food Network and expanded to grocery stores in 2013, is one of the best examples of success in incentivizing healthy foods by using GusNIP grant resources.

## **C. The Special Supplemental Nutrition Program for Women, Infants, and Children**

The Academy urges USDA to look to the WIC Cash Value Benefit as a program to help support communities of color, who have limited access to fresh, affordable fruits and vegetables. With shortages of WIC items on the shelf, increased CVB value will ensure WIC participants have sustained access to nutritious foods throughout the public health emergency. **The Academy urges USDA to permanently increase the CVB. Lastly, the Academy suggests making some of the physical presence flexibilities from the pandemic permanent to improve access to the program as well as updating the WIC food package to align with the most recent *Dietary Guidelines for Americans*.**

## **D. Healthy School Meals for All**

Providing healthy school meals for all school age children, regardless of their ability to pay, is a potential strategy to alleviate the disproportionate childhood food insecurity levels experienced by minority children. This disparity existed prior to the pandemic but has been exacerbated by the impact of COVID-19; in 2019, USDA reported that 23% of Black households with children and 17% of Latinx households with children were food insecure, in comparison to only 10% of white households with children.<sup>4</sup> During the pandemic, this disparity only increased, as the Urban Institute reported that food insecurity among Black households with children increased to 40%, and among Latinx households with children up to 39%.<sup>5</sup> School meals have proven crucial in alleviating childhood food insecurity amid the pandemic, in no small part because of waivers allowing schools to serve meals free of charge to all students regardless of their income level.

In addition to being a key support in alleviating childhood food insecurity among minority students, school meals can also help reduce racial disparities in health and education. School meals reduce childhood hunger, decrease childhood overweight and obesity, improve child nutrition and wellness, enhance child development and school readiness, and support learning, attendance and behavior.<sup>6</sup> Maintaining access to healthy school meals for all students will ensure that every child has access to the wide ranging educational and health benefits of school meals, regardless of their racial or ethnic background.

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<sup>4</sup> *Household Food Security in the United States in 2019*. USDA Economic Research Service. September 2019. Available at: <https://www.ers.usda.gov/webdocs/publications/99282/err-275.pdf?v=4232.8>

<sup>5</sup> *Forty Percent of Black and Hispanic Parents of School-Age Children Are Food Insecure*. Urban Institute. December 2020. Available at: <https://www.urban.org/research/publication/forty-percent-black-and-hispanic-parents-school-age-children-are-food-insecure>

<sup>6</sup> Food Research and Action Center. "School Meals are Essential for Health and Learning." [School-Meals-are-Essential-Health-and-Learning\\_FNL.pdf \(frac.org\)](#). Accessed July 15, 2021.

Because of how vital school meals have been during the pandemic in alleviating childhood food insecurity for Black students, we cannot go back to a school meal format that left out so many students through the tiered payment system, school lunch debt and stigma. Many struggling families do not qualify for free school meals under the current tiered system and school meal fees create a barrier to participation, not to mention stigma for children with lunch debt who experience lunch shaming practices. Offering free meals to all students eliminates the cost barrier for families who do not qualify, but who still struggle to make ends meet. Further, by having every student participate in school meals, it helps address the stigma some children fear of being labeled “poor” by their classmates, a phenomenon felt hardest by middle and high school students.

As we continue to work to heal our nation in the aftermath of the twin pandemics of COVID-19 and systemic racism, now is the time to maintain healthy school meals for all as a key educational support to ensure that students have access to the key nutrition they need to thrive inside and outside the classroom. **The Academy urges the USDA to provide Healthy School Meals for All for children beyond the 2021-22 school year.**

## **E. USDA Commodity Programs**

### *1. The Emergency Food Assistance Program*

USDA has a strong history of making commodity support purchases and distributing those purchases through USDA Food Distribution Programs like TEFAP. The Academy urges USDA to explore ways to better support small growers and farmers of color to participate in commodity support programs as well as equipping communities to receive and distribute to their members.

**The Academy suggests that USDA look at additional programs and systems to identify challenges for local growers, suppliers and distributors to contribute to a local/regional sustainable food system.** According to an Academy member in North Dakota, “It has been challenging for small, local food growers or distributors to take advantage of USDA relief opportunities; the price of their goods is higher than large organizations through economies of scale, there are transportation issues to get food where it needs to go, and lack of value chain and infrastructure. While some smaller growers were able to participate in Farmers to Families Food Boxes, for example, others didn’t have the means to know about the opportunities or get the food where it needed to go.” Even food rescue through the charitable food network face challenges to support local growers. “Transportation and distribution costs are one of the largest barriers to sourcing local nutritious food and distributing it into communities. Often there is more produce available for donation or low-cost purchase than a state or area can handle,” reports an Academy member who works closely with the emergency food network. An Academy member from New Mexico added, “Even if USDA invested in cold storage, food hubs and local processing centers, more small growers could support their local and regional food systems.” Lastly, an Iowa Academy member shared this example, “One county in Iowa will get millions of dollars from USDA in various forms of crop subsidies; however, none of that money goes to help fruit and vegetable growers, or to help start a vegetable freezing facility or a small facility for turning soybeans into tofu or wheat into flour or oats into rolled oats, or to help start a food hub to aggregate local supplies to serve local institutional food buyers like a school district.” This can result in communities of color being limited to participate in USDA programs as well as be the

recipient of USDA food programs.

## 2. *Food Distribution Program on Indian Reservations*

Some USDA policies should be reviewed to ensure that vulnerable communities have access to culturally appropriate foods at all times. One Academy member shared, “I work with SNAP and FDPIR eligible participants. We know participants have challenges navigating the process to receive benefits and choosing between these programs to piece together the most nutritious, culturally appropriate and appealing food items for their families. Participants have limited resources and need to know their families will accept and eat the food they access. Allowing greater flexibility for participants who are eligible for both programs to access nutritious and appealing food would help achieve the ultimate goal of providing nutrition security.”

### **F. Conclusion**

The Academy appreciates the opportunity to submit comments to the U.S. Department of Agriculture in response to its comment “*Identifying Barriers in USDA Programs and Services; Advancing Racial Justice and Equity and Support for Underserved Communities at USDA (USDA-2021-0006)*.” We urge USDA to thoroughly review its food and nutrition programs to ensure that barriers to access for underserved communities are eliminated. Please contact either Jeanne Blankenship at 312-899-1730 or [jblankenship@eatright.org](mailto:jblankenship@eatright.org), or Liz Campbell at 202-775-8277 ext. 6021 or [ecampbell@eatright.org](mailto:ecampbell@eatright.org), with any questions or requests for additional information.

Sincerely,



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