



June 30, 2021

Deputy Under Secretary Stacy Dean  
Food, Nutrition, and Consumer Services  
US Department of Agriculture  
Braddock Metro Center II  
1320 Braddock Place  
Alexandria, VA 22314

*Re: SNAP benefit adequacy and Thrifty Food Plan*

Dear Deputy Under Secretary Dean,

Thank you for your invitation to provide comments on re-evaluating the Thrifty Food Plan (TFP) and for prioritizing input from those most directly impacted by food and nutrition insecurity. These comments are on behalf of the Center for Science in the Public Interest, a national consumer advocacy organization focused on improving the food system to support healthy eating. We support strategies to strengthen SNAP to improve nutrition security, including by reducing barriers to accessing the program and ensuring that participants receive adequate benefits to afford a healthy diet.

Over the past three years, CSPI has led community engagement projects in [North Carolina](#), [Iowa](#), [Massachusetts](#), and [Pennsylvania](#) to gather feedback from SNAP participants and stakeholders on strategies to increase access to and affordability of nutritious food through SNAP.

Re-evaluating the TFP:

- *The current method of calculating the TFP takes into account the amount of food families eat in certain food categories, the cost of those food categories, and the nutrients in those foods. Are there other factors USDA should consider when re-evaluating and calculating the TFP?*

Without exception, the SNAP participants and stakeholders with whom we spoke feel that SNAP benefit amounts are insufficient to feed their families the food they need to thrive. SNAP participants note that benefits have not been adjusted to account for increases in cost of living, that benefits are inadequate to afford enough food as their children grow and increase how much they eat, and that healthy food is expensive, especially for participants with chronic diseases who require special diets. SNAP participants shared that they stretch their limited benefits by prioritizing cheap food that will last the longest, and that will fill them up most.

Given that [nearly half of all SNAP participants are children](#) and that food insecurity is [linked to diet-related chronic conditions](#) like type 2 diabetes and heart disease, the USDA should ensure that benefit levels are sufficient to meet the dietary needs of families with children at every stage of development, and to manage chronic disease through diet and lifestyle changes.

- *Given racial inequities and health disparities, how can cultural diversity and needs of Black/Indigenous/people of color communities be addressed in the TFP calculation?*

Re-evaluating the TFP to cover the cost of high quality, nutrient-dense food is an impactful step the USDA can take to improve food and nutrition insecurity for our country's most vulnerable populations. A TFP re-evaluation should be viewed through an [equity lens](#) as people who lack sufficient resources for nutritious foods have long been impacted by biased policies that exacerbate food and nutrition insecurity, such as ones that relegate racial minority groups to neighborhoods experiencing food deserts and food swamps. Further, USDA should consider the costs of purchasing culturally relevant foods in the TFP calculation. USDA has already recognized the importance of such foods: the Food Distribution Program on Indian Reservations (FDPIR) – which provides food to income-eligible tribal populations where recipients do not have access to SNAP offices or authorized retailers – includes a \$5 million a year Traditional, Locally- and Regionally-Sourced Food Fund. This fund supports purchase of culturally relevant foods like blue corn and bison.

- *Is there additional research or data that USDA should consider in calculating the TFP? Please provide.*

We are working with community-based organizations in several states to support campaigns to increase SNAP benefits, including with the Fair Food for All DC Coalition to “give SNAP a raise” in DC, where monthly benefits fall \$100 short of what is needed to afford an adequate diet. We also recently funded an [economic analysis and policy brief](#) that outlines problems with the Thrifty Food Plan and the cost to the District of tying SNAP to the Low-Cost Food Plan.

#### Calculating and Using SNAP Benefits:

- *Are there other tools or strategies that could help SNAP participants purchase and prepare healthy meals with their benefits?*

We know that the true cost of a nutritious diet includes the time and resources required to plan, prepare, and assemble a meal. Yet hot prepared nutrient-dense foods are not currently eligible for purchase with SNAP. This omission particularly [limits options](#) for persons who are challenged by mobility issues and housing insecurity, as well as parents working multiple jobs with limited time to prepare family meals. During our focus groups, SNAP participants [stated](#) that they wished benefits would cover hot prepared foods. Further, a [2021 survey](#) by researchers from Johns Hopkins and University of Michigan Schools of Public Health found that 84% of low-income Americans support allowing purchase of prepared foods with SNAP benefits. There are many time-saving, nutritious prepared foods that could be included in SNAP to support a healthy diet. USDA should consider how including nutritious, hot prepared foods in SNAP would make it easier for participants to afford and access healthy food.

#### Other Considerations for SNAP-Participating Households:

- *Do nearby stores sell healthy food that is reasonably priced?*

Shoppers that participate in SNAP [spend the majority of their benefits](#) at superstores and supermarkets, which are likely to sell a variety of healthy options, but the store layout and product promotions [do not make it easy to choose those foods](#).

Further, participants [shopping at smaller stores may have limited access to healthy options](#). It is hard to eat what is not readily available. In addition, studies show that [variety affects food choices](#). In order to participate in SNAP, retailers only need to stock 36 staple food items (4 staple food categories x 3 varieties x 3 stocking units). Prior to 2018, SNAP retailers only stocked 12 staple food items (4 x 3 x 1). The 2014 Farm Bill increased the number of varieties from 3 to 7. However, an appropriations rider prevents USDA from implementing this increase to support access to healthier food.

We are encouraging Congress to remove this rider so that USDA can promulgate a rule that increases the variety of *healthy* foods in SNAP-authorized retailers. [Healthy Eating Research](#) has recommendations to promote health in small retail stores – including minimum stocking levels and marketing strategies – that can be used to inform healthy SNAP retail.

- *Is there additional research or data that USDA should consider related to SNAP households? Please provide.*

USDA's recent [study](#) offers critical insight in to some of the individual and environmental barriers that SNAP participants face when trying to achieve a healthy diet. However, we believe that a more complete picture of these barriers includes an investigation of how the commercial determinants of health affect SNAP participants. When considering strategies for increasing access to nutritious food for households that participate in SNAP, we urge you keep in mind the significant ways in which the broader food system influences individual choice.

Food manufacturers maximize profits by pushing cheap, unhealthy calories. The communities in which SNAP participants live may be uniquely exposed to the worst of our food system, including [unhealthy food marketing](#) and [lack of affordable healthy options](#). A flagrant example is shown in a New York [study](#) demonstrating that advertisements for sugar-sweetened beverages were over four times more likely to appear in stores during SNAP issuance periods compared to other times of the month in areas with high SNAP enrollment. Individuals should not have to fight an upstream battle alone to make healthy food choices. Because of the wide reach of SNAP, even small changes to the program and to consumer purchasing patterns towards healthier food could have a significant public health impact, astutely noted in a 2014 USDA FNS [report](#).

There is substantial evidence that offering additional benefits is associated with increased food security. As such, re-evaluating the TFP is a crucial step. Yet, given pervasive and targeted marketing of cheap, unhealthy food, evidence does not show that a benefit increase alone would significantly improve nutrition insecurity, as measured through diet quality, nutritional intake, and diet-related disease. Our [research](#) identifies peer-reviewed research and surveys that identify nutritional gaps that may remain following a benefit increase and the potential benefits of layering other nutrition strategies on top of a benefit increase, such as sugary beverage reduction measures. SNAP participants in our community engagement projects echoed support for these strategies and called for making in-store changes to promote healthy options while de-emphasizing unhealthy products, especially in advertisements targeting children and at point-of-sale locations.

More research is needed to determine the approaches that can best improve food and nutrition security for SNAP participants, which is why we urge USDA to include in the 2022 Food and Nutrition Service Study and Evaluation Plan (the research agenda for FNS submitted to Congress for approval) proposals to examine pilots to promote nutrition security through SNAP.

Currently, we are engaging with community-based organizations in 13 additional states about improving food and nutrition security through SNAP. We will continue to help uplift the voices of people with lived experience to shape this program.

Thank you again for the opportunity to share our comments, and we look forward to continuing to work together to build a healthy and equitable food system. Please contact Cassie Ramos by telephone at

202-777-8375 or by email at [cramos@cspinet.org](mailto:cramos@cspinet.org) with any questions or requests for additional information.

Sincerely,

Peter Lurie  
Executive Director and President

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