



2023 Farm Bill: Nutrition Security Recommendations

The 2023 Farm Bill is a critical opportunity for Congress to improve food and nutrition security for millions of Americans who participate in the Supplemental Nutrition Assistance Program (SNAP). Congress must protect and strengthen access to and benefit levels for SNAP, reduce barriers for eligibility in SNAP, and address nutrition security by improving the food environment to increase equitable access to healthy food, invest in nutrition research, and strengthen nutrition education which can lower the burden of healthcare costs for millions of Americans.

The following document details specific recommendations developed by the National Alliance for Nutrition and Activity (NANA) coalition for improving nutrition security in the 2023 Farm Bill.

Endorsement of these recommendations does not imply that signatories have taken a position on every recommendation.

Protect and strengthen benefit levels for and access to SNAP

- Protect the update to the Thrifty Food Plan. Ideally, update SNAP to align with the Low-Cost Food Plan as the basis for benefit levels. The Low-Cost Food Plan is closer to the amount that low- and moderate-income families report needing to spend on food.
- Repeal the arbitrary three-month time limit for SNAP participation for abled-bodied adults without dependents. Many adults face barriers to working or documenting work of at least 20 hours per week and removing the time limit would increase access to the program, thereby improving food security for many families.
- Eliminate the ban on SNAP for individuals with prior drug felony convictions, both increasing nutrition security and reducing recidivism.
- Expand SNAP eligibility for college students by making the pandemic-era expanded college student eligibility permanent.
- Remove barriers to accessing SNAP benefits for veteran and active duty military families and reduce significant SNAP participation gaps for particular populations, including seniors and veterans.
- Allow for automatic triggers of the successful COVID-19 waivers during emergencies. These waivers allowed states to have more flexibility for various components of SNAP operations to facilitate access to the program, including by extending certification periods and relaxing reporting and interview requirements.
- Authorize the standard medical deduction in every state for seniors and people with disabilities and eliminate the cap on the excess shelter deduction.

- Provide authorization and funding for American Samoa, the Northern Mariana Islands, and Puerto Rico to transition from the Nutrition Assistance Program (NAP) to SNAP. Allow for flexibility guided by each territory's administration, such as allowing for culturally appropriate purchases and local food purchasing requirements.
- Allow for simultaneous participation in SNAP and the Food Distribution Program on Indian Reservations (FDPIR).
- Allow tribal nations to administer SNAP by granting the USDA Food and Nutrition Service (FNS) the requisite 638 authority. This change recognizes tribal sovereignty and allows Indigenous communities to expand the reach of SNAP in their own communities.
- Increase funding to expand FDPIR's self-determination projects, enabling more tribes to source food directly for FDPIR. In addition, include more tribal-specific Indigenous foods to allow for more culturally appropriate options.

Improve the food environment by increasing equitable access to healthy food

Improve the food environment online: Online SNAP improvements

- Expand online SNAP delivery: Reimburse farmers, smaller retailers, and independent retailers for SNAP delivery and service fees and require authorized larger retailers and their e-commerce vendors to waive delivery and service fees for SNAP orders that exceed a minimum amount so fees are not incurred by SNAP participants.
- Ensure SNAP participants have the same access to food and nutrition information online as they do in-store: Require online SNAP retailers to provide all information required to appear on food labels or labeling, including nutrition, ingredient, and allergen information, prominently and conspicuously available to consumers at the point of selection prior to purchasing the food and without intervening marketing information.
- Ensure SNAP participant privacy is protected: Require online SNAP retailers to adhere to a granular set of privacy safeguards for limiting what kinds of data can be collected from individuals and how that information can be used and shared with third parties. The USDA should establish a uniform privacy policy with clearly stated specific data and consumer protections.
- Support online SNAP retailers and expand retailer participation: Establish an EBT Online Redemption Portal and SNAP Online Purchasing Technical Assistance Center to expand retailer participation in online SNAP and provide State agencies, eligible retailers, and program participants information on and technical assistance with program awareness, training, and research. Provide grants to help small retailers adopt the technology needed to accept online SNAP. Collaborate with GusNIP TA center and grantees to ensure incentive programs are integrated and promoted within online SNAP platforms.
- Evaluate online SNAP: Expand and evaluate the impact of the SNAP online purchasing program on a number of factors that could include: SNAP and retailer participation use including barriers, efforts to increase program awareness and expand use among SNAP participants and retailers, USDA technical assistance efforts with retailers, technology issues, and impact of the online food environment on diet quality and nutrition security.

Improve the food environment in-store: Strengthen SNAP stocking standards and explore ways to improve marketing of healthy foods

- Increase healthy foods sold in-store, particularly for smaller SNAP retailers: Require SNAP retailers stock an increased variety of staple foods, including religious and culturally-appropriate healthy foods, and an increased number of perishable items, and consider the feasibility for implementation. Unfortunately, a previous requirement from the 2014 Farm Bill to increase the number and variety of staple food products was blocked due to feasibility concerns. We urge Congress to consider a pathway forward for strengthening access to healthy food, particularly for smaller food retailers, while taking into account implementation concerns. These efforts must adequately protect access for SNAP recipients to retailers.
- Increase technical assistance support for retailers to sell healthy foods: Establish a technical assistance center that provides information on and technical assistance with food sourcing for small and independent retailers, including local information on vendors and collective ordering opportunities.
- Explore ways to improve the marketing of healthy foods: Pilot healthy marketing strategies with SNAP retailers including food and beverage placement and promotion strategies in-store, such as high-traffic areas of the store like checkout and end caps, and online, such as through search ordering.

Improve access to fruit and vegetable incentives

- Strengthen the Gus Schumacher Nutrition Incentive Program (GusNIP) by increasing funds to continue national expansion in-store and online, reducing or eliminating the match requirement for more equitable distribution of funds and scalability, and investing in issuing incentives directly onto the SNAP card.

Improve access to healthy foods through food banks and other emergency feeding programs

- Increase procurement of healthy foods:
 - The USDA should prioritize the purchase of foods recommended by the Dietary Guidelines for Americans and that are most under-consumed in food programs such as through The Emergency Food Assistance Program (TEFAP), the Commodity Supplemental Food Program (CSFP), and others.
 - Adopt culturally-responsive nutrition guidelines for all USDA Food Distribution Programs. Comprehensive nutrition guidelines are currently absent from USDA Food Distribution Programs. Requiring guidelines would correct current nutritional quality disparities among USDA programs and ensure the charitable food system is receiving health-promoting, culturally appropriate food that would better address the needs of the populations served.
- Increase The Emergency Food Assistance Program (TEFAP) funding by indexing TEFAP to the Low-Cost Food Plan. Currently, the annual TEFAP appropriation is calculated based on changes to the Thrifty Food Plan. However, the Low-Cost Food Plan is more closely aligned with the amount that low- and moderate-income families report needing to spend on food and would allow the charitable food system to better meet clients' needs.
- Increase TEFAP Farm to Food Bank (FTFB) funding to at least \$25 million annually. In addition, remove the state match requirement within the TEFAP FTFB program and allow for the purchase of food. The FTFB supply chain is a key opportunity to fight hunger and increase nutritious donations while cutting food waste. The current funding is not enough to support the full extent of FTFB opportunities in each state. Allowing funds to be used for

purchasing food and eliminating the match requirement can better support the participation of smaller producers and less resourced states.

Invest in research to improve nutrition security

Continue the momentum, first established in The Food, Nutrition and Conservation Act of 2008 (2008 farm bill), by investing \$100 million in state-based food and nutrition security demonstration projects to evaluate strategies that can promote nutrition while not limiting benefits or increasing stigma.

- Explore strategies proposed by nutrition researchers including, but neither inclusive nor prioritized in any particular order:
 - Allowing hot prepared foods.
 - Increasing the value of benefit allotments at 150 percent, 175 percent, and 200 percent of the Thrifty Food Plan, building off the 2008 Farm Bill which authorized a pilot to increase the purchasing power for SNAP participants.
 - Implementing stronger stocking requirements, that also protect access for SNAP recipients to retailers, first authorized in the 2008 Farm Bill.
 - Testing innovative marketing strategies such as product placement and promotions to increase purchases of nutritious foods.
 - Piloting a fruit and vegetable incentive combined with a sugary beverage reduction strategy at the point of purchase, building off the first fruit and vegetable incentive pilot in the 2008 Farm Bill.
 - Integrating SNAP nutrition education (SNAP-Ed) into research projects, first authorized in the 2008 farm bill.
 - Improving the enrollment process, such as through integrated benefits applications across multiple programs.
- Congress mandated funding (\$20 million) for a fruit and vegetable incentives pilot (also known as the Healthy Incentives Pilot, the results of which led to the Food Insecurity and Nutrition Incentive grant program, now known as the Gus Schumacher Nutrition Incentive Program) and did not fund other pilots in the 2008 Farm Bill. Since then, the Bipartisan Policy Center and the bipartisan congressionally-mandated National Commission on Hunger have similarly recommended additional demonstration projects.

Formalize a valid measure of nutrition security to allow researchers and practitioners to adequately assess barriers to having consistent access to foods that promote wellbeing.

- Require the establishment of metrics and annual reporting for nutrition security. It is well known that SNAP is effective at reducing poverty and food insecurity, because food insecurity metrics are well-established and annually reported. However, while the USDA has released a working definition of nutrition security, there are no established or agreed-upon metrics for evaluating nutrition security which are needed for assessing program effectiveness and overall trends. For instance, currently there are no metrics to assess equitable access, availability, and affordability of nutritious food (the working definition of nutrition security) whereas there are well-established metrics for food insecurity. In addition, nutrition security metrics should evaluate diet quality and alignment with key recommendations of the Dietary Guidelines for Americans as measured by the USDA's Healthy Eating Index (HEI) score. The USDA monitors the extent and severity of food

insecurity in U.S. households through an annual, nationally representative survey sponsored and analyzed by the USDA's Economic Research Service (ERS). Once established, we urge ERS to add nutrition security metrics to this survey.

Provide regular reports on SNAP purchase data to give insight into affordability of foods, the timing of purchases within a monthly benefit issuance cycle, and the types of products typically purchased with SNAP funds.

- The USDA must collect and report on SNAP purchase data annually and make a summarized report of aggregated data available to the public, while protecting identity of retail providers and individuals that use SNAP benefits. The last time the USDA did a study on foods typically purchased by SNAP households was from 2011 data from one leading grocery retailer. From this data we can determine the relative affordability of certain foods based on overall purchasing, which can also contribute to, and provide more regular insight into affordability, than based off the USDA's Thrifty Food Plan review which is supposed to occur every five years. Further, knowing when certain foods are purchased and what type of food is being purchased will help measure food and nutrition security more accurately than self-reported data.

Improve evaluation and reporting, and increase investments, of USDA nutrition research.

- Build research and evidence-based literature for innovation and improvements in program effectiveness and efficiencies.
- Invest in research that includes program evaluation, surveillance, and reporting systems that provide evidence for actions to increase equity, improve access, and enhance cultural alternatives.
- Support research that leads to improved health outcomes through nutrition program participation, such as: SNAP benefit adequacy, SNAP disbursement frequency (i.e., weekly or bi-monthly), reduction of participant stigma in nutrition assistance programs and child nutrition programs, and improved nutritional health of SNAP participants.
- Fund, develop, and share evaluation approaches that provide valid and reliable data, include qualitative and quantitative measurements, and facilitate assessment across all federal nutrition education programs.
- Evaluate federal, state, and local factors that impact participation in and health impact of SNAP.
- Increase USDA extra- and intramural research: Authorize full funding for the Agriculture and Food Research Initiative (AFRI) at \$700 million annually.
- Increase nutrition research on sustainability by tripling the amount of current funding from \$15 million to at least \$50 million per year for Sustainable Nutrition Science. This research and education intersects food production, climate and the environment, and nutrition, with a focus on health equity and distribution of awards to minority-serving institutions, as well as those engaging in collaborative partnerships and community-based participatory research.

Strengthen nutrition education

Increase SNAP-Ed funding

- Expand SNAP-Ed program funding from \$450 million to at least \$900 million annually to reach more people, enable more organizations to participate, and encourage innovation,

including through grants to minority-serving institutions such as historically black colleges and universities, tribal-serving organizations, Latine-serving organizations, and non-profits. While there was a recent two-percent increase of SNAP-Ed funding, SNAP-Ed funding has been limited in comparison to the growth of the target audience. Agency demand to participate has increased 60 percent since 2010, leading to more but smaller projects and, often, less innovation. This increase in agency demand has also put a strain on SNAP-Ed state implementing agencies (SIAs) to perform key administrative tasks crucial to SNAP-Ed due to inadequate funding. An increase in the financing will allow administrative staff in SIAs to facilitate better attention to participants and intervention methods and evaluation of programming.

Advancing equity and inclusion in nutrition education programs and policies

- Require federally-funded nutrition education and promotion programs to use participatory methods, when appropriate, to engage with the communities they serve throughout the planning, developing, evaluating, and maintenance of nutrition education initiatives to ensure that the programs are community-centered and designed with cultural humility.
- Promote, fund, and aid technical assistance for community-driven, culturally responsive nutrition education programs which includes training a diverse workforce on the skills needed to engage the community in development, implementation, assessment, and evaluation of nutrition education initiatives.
- Fund consumer nutrition education, social marketing campaigns that use appropriate forms of media and consistent messages that are culturally and economically tailored for the audience.
- Require federally-funded nutrition education and promotion programs to recognize, respect, and include differences to encourage diversity, equity, and inclusion in ability, age, creed, culture, ethnicity, tribal sovereignty, gender, gender identity, political affiliation, race, sexual orientation, size, and socioeconomic characteristics.
- Require federal nutrition education programs to establish and maintain a core set of measurable outcomes that have been adapted to meet diversity, equity, and inclusion variables and incorporate input from diverse audiences.

Strengthen nutrition education and SNAP-Ed policies

- Strengthen the definition of nutrition education: define as any combination of individual and group-based education, health promotion, and intervention strategies designed to improve food and nutrition security and physical activity using approaches that are evidence-informed; comprehensive; can be delivered at multiple complementary organizational and institutional levels; and inclusive of community and public health approaches.
- Encourage nutrition education programs to include physical activity promotion strategies in alignment with the most recent Physical Activity Guidelines as an allowable expense.
- Leverage the collective impact of USDA nutrition education and promotion efforts to increase food security, healthy eating, and physical activity for all Americans by requiring formal collaborations at the national, state and local levels, prioritizing underserved populations, especially children and low-resource communities. These programs include, but are not limited to, SNAP-Ed, EFNEP, Team Nutrition, GusNIP, WIC, Farm to School, TEFAP, and FDPIR.
- Remove statutory barriers and encourage all USDA nutrition programs to provide information about the benefits of participating in federal nutrition assistance programs.

- Strengthen SNAP-Ed capacity to pivot services from pandemic response to conduct joint projects with child nutrition programs, increase the support to children and families in community settings (including schools and childcare settings), support efforts to reduce food and nutrition insecurity in households with children and expecting mothers, and boost the diversity of SNAP-Ed providers.
- Provide regular updates to the comprehensive SNAP-Ed Evaluation Framework and Interpretive Guide, strengthen the SNAP-Ed Toolkit as a national database of comprehensive nutrition education programs and evaluation tools by aligning it with the SNAP-Ed Framework, and update the electronic report capacity to aggregate outcome results from state programs into annual reports available to the public.
- Provide additional funding and flexibility for SNAP-Ed policy, systems, and environmental (PSE) change and social marketing approaches that support healthy shifts where people live, work, learn, shop, eat, and play to increase the impact, effectiveness, and reach of nutrition education initiatives.

Improve SNAP-Ed and nutrition education technical assistance

- Fully fund the new SNAP-Ed Electronic Information Clearinghouse, technical assistance, and electronic reporting system required in the 2018 farm bill. Align these efforts with the four pillars of food and nutrition security recently announced by the USDA. Include child nutrition programs and WIC in the development of the clearinghouse and technical assistance system to increase efficient access to and implementation of comprehensive, practice-tested nutrition education, promotion, social marketing, and community initiatives.
- Establish and fund a new, or existing, nationwide training and technical assistance resource center that could provide training to qualified professionals in nutrition or related subject areas and evidence-based support to all federal nutrition education programs for best-practices to enhance networking, coordination, and capacity building for nutrition education and promotion efforts by the public, non-profit, and business sectors. This could include:
 - Elevating lessons learned from the GusNIP program;
 - Providing support to new and existing SNACs (State Nutrition Action Councils) and similar entities, that are designed to increase the effectiveness of USDA categorical programs and other partners;
 - Examining regulations and guidance regarding duplication of services and lack of community and stakeholder input.
 - Encourage the provision of consistent nutrition education in schools and child care programs via SNAP-Ed by formalizing greater opportunities for comprehensive SNAP-Ed programming within the 0-5 child care and K-12 school system.
 Coordinate with District-level *Food & Nutrition Service Departments and Licensing Agencies* to implement nutrition education in schools and child care sites.

Improve nutrition education research and evaluation

- Establish and fund an entity within the federal government that would have the responsibility of coordinating the delivery, implementation, evaluation, and advising on resource allocation across all federal agencies that provide nutrition education programs.
- Fund, develop, and share evaluation approaches that provide valid and reliable data, include qualitative and quantitative measurements, and facilitate assessment across all federal nutrition education programs.

- Provide SIAs with resources to conduct modern, inclusive, multi-method evaluations using modern tools, technology, methods, and resources needed to capture change in large, diverse audiences.
- Require the USDA to compile and make SIA evaluations publicly available. Evaluations should provide evidence and guide the adaptation of strategies and approaches designed around the needs of consumers and communities.
- Encourage food companies and retailers to conduct multi-component social marketing efforts in coordination with partner organizations as described in the SNAP-Ed Guidance: Foster healthy shopping through in-store and online support for healthy eating, including incentives or discounts for healthy foods, especially fruits and vegetables, and avoidance of marketing less healthy foods to children and price-sensitive shoppers.
- Provide training and evaluate best practices on delivering online nutrition education through FNS's nutrition education programs. Invest in and harvest effective practices on virtual delivery of nutrition education and PSEs and provide training to federally funded nutrition education professionals.
- Establish pilot programs to work with industry to test effective ways to integrate nutrition education and systems changes through electronic purchasing platforms.

[List organizational signatories]

About the National Alliance for Nutrition and Activity (NANA)

These recommendations were developed by the National Alliance for Nutrition and Activity (NANA) coalition. NANA is the nation's largest nutrition advocacy coalition comprised of over 500 national, state, and local organizations, and 11-member Steering Committee consisting of: Academy of Nutrition and Dietetics; American Academy of Pediatrics; American Cancer Society Cancer Action Network; American Heart Association; American Public Health Association; Association of State Public Health Nutritionists; Center for Science in the Public Interest; National Association of Chronic Disease Directors; National WIC Association; Nemours Children's Health System; and International Fresh Produce Association.

NANA envisions a country where everyone has access to adequate, affordable, culturally appropriate, and nutritious food; where the food environment promotes healthy eating; in which evidence-based nutrition policy is the basis of food policies and programs; and in which physical activity is promoted. NANA is committed to carrying out this work with a particular focus on reaching priority populations, starting from the earliest years, eliminating health disparities, and advancing racial justice. These systemic changes will reduce the illnesses, diseases, disabilities, premature deaths, and costs associated with diet and inactivity. Our efforts include advocating for strong public policy and program funding such as for federal nutrition programs, supporting effective education programs, and promoting structural and policy approaches to help the public eat better and be more active. www.NANACOALITION.org.

For more information, please contact policy@cspinet.org.