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Deputy Undersecretary Dean
Food and Nutrition Services
Braddock Metro Center II
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Alexandria, VA 22314

RE: Thrifty Food Plan

Dear Deputy Undersecretary Dean:

The Academy of Nutrition and Dietetics (the “Academy”) appreciates the opportunity to submit comments to the United States Department of Agriculture in direct response to its comment request for the review of the Thrifty Food Plan. 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 the Thrifty Food Plan and encourages USDA to conduct the review using a cultural humility lens. The Academy urges USDA to update the Thrifty Food Plan so that it aligns with the most recent 2020 Dietary Guidelines for Americans and reflects current food prices and economic environment. Additionally, the Thrifty Food Plan must account for culturally appropriate market baskets, realistic time expectations for shopping and meal preparation, and transportation challenges. In short, the Thrifty Food Plan must be substantially overhauled if it is to assure adequate nutrition for millions of low-income Americans and achieve the fundamental purposes of the Supplemental Nutrition Assistance Program.

A. Academy Position on Nutrition Security

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 including communities of color. 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.¹ Given that the Thrifty Food Plan is used as the basis for determining benefits for the Supplemental Nutrition Assistance Program, the most critical federal food assistance program positioned to support nutrition security, it is imperative that it reflect the most recent Dietary Guidelines for Americans and align with economic reality especially in the aftermath of the COVID-19 pandemic.

B. The Thrifty Food Plan Review Must be Centered around Racial and Ethnic Health Disparities

The Academy is particularly concerned about long-standing and ongoing racial and ethnic disparities, including those evidenced in and heightened by the COVID-19 pandemic, and the impact they have had on communities of color. People from racial and ethnic minority groups were hospitalized and died from COVID-19 at much higher rates than white people. These same communities already were far more likely to experience food insecurity. 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 most critical consideration indicated by Academy members during an informal Thrifty Food Plan listening session was that the Thrifty Food Plan review must be centered around racial and ethnic health disparities. One member shared, “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 specialty stores that may not accept SNAP benefits or participants have to travel long distances to find them in larger grocery stores.” Another 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.”

Additionally, Academy member experts in research expressed concerns that USDA may not have access to or 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

¹ 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.

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 member suggests 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 DGAs have different types of meal patterns such as Mediterranean and vegetarian. Those meal patterns should be adapted for different racial and ethnic groups.”

C. The Thrifty Food Plan Should Reflect Realistic Resources of SNAP Recipients

Affordability

The Academy believes that SNAP is an effective and efficient program and given the improved health and reduced health care costs associated with reductions in food insecurity, the Academy encourages initiatives that ensure more eligible people are connected to and are benefitted by the program, which includes providing incentives to encourage purchases of healthy food. Food insecurity significantly impacts the health and well-being of individuals and is a risk factor for negative psychological and health outcomes.² Food insecurity also increases the prevalence and severity of diet-related disease, such as obesity, type 2 diabetes, and heart disease.

Because of limited financial resources, those with food insecurity may use coping strategies to stretch budgets in a manner harmful for health, such as engaging in cost-related medication underuse or non-adherence^{3, 4, 5} postponing or forgoing preventive services or needed medical interventions.

In a recently released study from USDA, 81% of SNAP participants reported challenges to accessing a healthy diet and 61% attributed that to the affordability of the food.⁶ This aligns with statements of Academy members, “I work for SNAP-Ed and I often hear from SNAP recipients that they have to make hard choices to make their money stretch. They often know that they are choosing quantity over quality.” Another interesting theme that was shared was parents’ inability to introduce healthy new foods to their children. With limited resources, parents must know that their children will eat the food they purchase. “I work with SNAP and Food Distribution Programs on Indian Reservations eligible participants. We know participants have challenges navigating the process to receive benefits and choosing between these programs to

² Hartline-Grafton, H. (2017). *The Impact of Poverty, Food Insecurity, & Poor Nutrition on Health and Well-Being*. Washington, DC: Food Research & Action Center.

³ Herman, D., Afulani, P., Coleman-Jensen, A., & Harrison, G. G. (2015). Food insecurity and cost-related medication underuse among nonelderly adults in a nationally representative sample: *American Journal of Public Health*, 105(10), 48-59.

⁴ Afulani, P., Herman, D., Coleman-Jensen, A., & Harrison G. G. (2015). Food insecurity and health outcomes among older adults: The role of cost-related medication underuse. *Journal of Nutrition in Gerontology and Geriatrics*, 34(3), 319-343.

⁵ Knight, C. K., Probst, J. C., Liese, A., D., Sercy, E., & Jones, S.J. (2016). Household food insecurity and medication “scrimping” among US adults with diabetes. *Public Health Nutrition*, 19(6), 1103-1111.

⁶ USDA. [Barriers that Constrain the Adequacy of Supplemental Nutrition Assistance Program \(SNAP\) Allotments | USDA-FNS](#). Accessed June 30, 2021.

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. They don't have the luxury of introducing new foods.”

The Thrifty Food Plan does not take into account special diets which is a major weakness of the calculation. **The Academy urges USDA to consider how special diets including food necessary to comply with Medical Nutrition Therapy is used by SNAP recipients.** One member shared, “Many of the people I work with report that the SNAP benefit is not sufficient and is often running out by the second or third week of the month. Participants who run out of benefits are faced with feeding their families less healthful options or options from a food bank or food pantry where choice is not always possible. With an increase in the benefit, SNAP households will be able to purchase more healthful, expensive foods such as fresh fruits and vegetables and low sodium canned goods. Adequate benefits allow people to purchase foods of their choosing and help to ease the strain on charitable food providers. My colleagues who provide clinical services like Medical Nutrition Therapy believe a more adequate benefit can help people find foods that support, not worsen, chronic diet-related diseases.”

Time to Procure and Produce Food

Another substantial weakness of the Thrifty Food Plan is the amount of time estimated to procure and prepare healthy food—it has not been updated since 1999.⁷ **The Academy urges USDA to update this estimation to reflect the time expectations and norms of SNAP recipients.** During the Academy's listening session one member made this suggestion, “I would like to see USDA review the work of Dr. Drew Hanks who has published research related to the cost of time and time poverty, which is a real challenge for low-resourced households.” Another member pointed to college hunger and said, “In focus groups we found that students are at high risk of food insecurity, we found very specific needs in this vulnerable group, mostly related to convenience and cost as it relates to time to procure and prepare healthy meals because of competing academic priorities.” Additionally, another Academy member described that, “The expectations for family income have risen dramatically. Now most families have two working adults or are headed by a single parent and have less time for meal preparation and food acquisition.”

Access to Equipment

The Academy believes another consideration that must be considered during the TFP review is access to kitchen equipment and facilities to properly store and prepare foods. USDA reports that SNAP recipients indicated access to proper equipment is a major barrier to accessing a healthy diet. Multiple Academy members conveyed the same concern. One member stated, “Sometimes the more affordable food options must be purchased in bulk. Many people are not able to safely purchase, transport, and store a 10-pound package of chicken even though

⁷ USDA. [The Thrifty Food Plan, 1999. Administrative Report](#). Accessed June 30, 2021.

it is the most economical choice.” Another member pointed out the increase in homelessness as housing costs continue to outpace family income. “We have seen more people coming to our pantry that don’t have a place to live let alone prepare food. We have to be thoughtful about what type of food that we can give them. Convenience items are often more expensive.”

Transportation and Food Access Challenges

The Academy supports efforts to account for transportation challenges when updating the TFP. “Living in a rural state we find that transportation, availability of well-stocked SNAP outlets near where people live, and broadband access are all challenges to people accessing enough healthy food every day. This is also the case for some of my colleagues who practice in urban areas. Corner stores, bodegas, rural grocery stores place small orders, have small shelf space, and offer a smaller variety of food items. I encourage the USDA to study how changes in the TFP and the Staple Food Requirements impact one another.” Another member attending the listening session was wrapping up research on access to healthy foods in low-income neighborhoods and she shared that, “We found that stores in low-income neighborhoods had limited access to cultural foods and the quality of fresh foods was terrible. Even eggs were stained, soiled and cracked. Cost was significantly higher. There has been a lot of gentrification in the area and we plan to conduct the study again to see if anything has changed.” Another member from a rural state reported that, “Sometimes folks may be traveling 60 miles to a store. They are doing many errands in a trip once a month. They don’t have the luxury of popping all over town to buy the food that is most economical. USDA must consider these transportation and access challenges when determining SNAP benefits.”

Nutrition Education

Lastly, nutrition education and policy, systems and environmental change efforts are critical for empowering families to learn and develop the skills to access, plan, choose, prepare and consume nutrient dense meals. Families have many challenges to food acquisition and preparation including limited time and socioeconomic barriers. Nutrition education providers (i.e. SNAP-Ed, EFNEP) are uniquely positioned to identify barriers within a community and tailor interventions in partnership with the community.

D. Conclusion

The Academy of Nutrition and Dietetics applauds USDA’s efforts to examine the Thrifty Food Plan and encourages USDA to conduct the review using a cultural humility lens. The Academy urges USDA to update the Thrifty Food Plan so that it assures a nutritionally adequate diet and health for low-income Americans and aligns with the most recent 2020 Dietary Guidelines. Additionally, the Thrifty Food Plan must account for culturally appropriate market baskets, realistic time expectations for shopping and meal preparation, and transportation challenges. Please do not hesitate to contact us with any questions. Please contact either Jeanne Blankenship

by telephone at 312-899-1730 or by email at jblankenship@eatright.org or Liz Campbell by telephone at 202-775-8277 ext. 6021 or by email at ecampbell@eatright.org with any questions or requests for additional information

Sincerely,



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