

October 27, 2020

Edward Harper
Food and Nutrition Service
U.S. Department of Agriculture
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RE: Agency Information Collection Activities: National Study of State Adoption and Use of Pandemic- Electronic Benefit Transfer During Covid-19

Dear Mr. Harper:

The Academy of Nutrition and Dietetics (the “Academy”) appreciates the opportunity to submit comments to the Food and Nutrition Service of the U.S. Department of Agriculture related to its proposed information collection, “Agency Information Collection Activities: National Study of State Adoption and Use of Pandemic-Electronic Benefit Transfer During Covid-19,” published into the Federal Register originally on August 28, 2020. Representing more than 107,000 registered dietitian nutritionists (RDNs)¹, 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 supports the continuation of the Pandemic-Electronic Benefit Transfer (P-EBT) program and efforts to streamline and improve efficiency of adoption and use of the program. The Academy recognizes that the pandemic has disproportionately impacted marginalized and minoritized communities. It is critical to ensure that delivery of effective programs to improve dietary intake for those at greatest risk for food insecurity and complications of COVID-19, like P-EBT, have as few barriers to implementation as possible.

Academy Position on Food Insecurity

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,

¹ The Academy approved the optional use of the credential “registered dietitian nutritionist (RDN)” by “registered dietitians (RDs)” to more accurately convey who they are and what they do as the nation’s food and nutrition experts. The RD and RDN credentials have identical meanings and legal trademark definitions.

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 outcomes².

The Academy is particularly concerned about the disproportionate impact the COVID-19 pandemic has had on communities of color due partially to limited access to healthy food and proper health care. The Centers for Disease Control and Prevention have reported that people from racial and ethnic minority groups are being hospitalized and dying from COVID-19 at much higher rates than white people. These same communities already were far more likely to experience food insecurity. Add rising unemployment, school closures and widespread uncertainties about the future and the pandemic has only made the situation worse.

Practical Utility of Information Collection

Assessing the adoption and use of P-EBT is critical as we move through the COVID-19 pandemic. Academy members agree with challenges regarding the implementation of the P-EBT program reported by the Center on Budget and Policy Priorities and the Food Research and Action Center³, especially:

- Reaching children that are homeless, living in foster care, no longer living with a guardian who received the benefits on their behalf, or come from immigrant households;
- Identifying children who are receiving nutrition assistance from programs besides SNAP;
- Pitfalls in requiring and implementing application processes to receive P-EBT; and
- Communication between agencies and families.

And support collection and distribution of best practices such as:

- Best practices for the card activation process; and
- Best practices for streamlining the system by building on existing and newly realized collaborations between agencies.

It is critical for this collection to have utility that data be collected to address the challenges outlined above as well as disseminate best practices.

Burden Estimate

The burden estimate is low. According to Academy members, it will take more than three hours of staff time to complete the data collection and if it is completed thoroughly, it will require a great deal of collaboration with the sister state agency to accomplish and provide

² 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.

³ Neuberger BZ, Fitzsimons C, Rosenbaum D, Philbin EM. Lessons From Early Implementation of Pandemic-EBT Opportunities to Strengthen Rollout for School Year 2020-2021. 2020:1-13.

correct information. Lastly, the burden could be reduced by using an automated or web-based data collection instrument.

Conclusion

The Academy appreciates the opportunity to submit comments to the Food and Nutrition Service of the U.S. Department of Agriculture related to its proposed information collection, “Agency Information Collection Activities: National Study of State Adoption and Use of Pandemic- Electronic Benefit Transfer During Covid-19.”

We applaud Food and Nutrition Service of the U.S. Department of Agriculture’s effort to streamline and improve the efficiency of the adoption and use of P-EBT and encourage USDA to collect data that will address well documented challenges with the implementation of the program. Please contact either Jeanne Blankenship at 312-899-1730 or by email at jblankenship@eatright.org or Liz Campbell 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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