

September 14, 2020

Eric Williams
Food and Nutrition Services
U.S. Department of Agriculture
1320 Braddock Place
Alexandria, VA 22314

RE: Agency Information Collection Activities: Best Practices in Disaster Supplemental Nutrition Assistance Program (D-SNAP) Operations and Planning

Dear Mr. Williams:

The Academy of Nutrition and Dietetics (the “Academy”) appreciates the opportunity to submit comments to the U.S. Department of Agriculture related to its information collection, “*Best Practices in Disaster Supplemental Nutrition Assistance Program Operations and Planning*” (85 FR 42821), published in the Federal Register originally on July 15, 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 and is committed to improving the nation’s health through food and nutrition.

The Academy supports this proposed information collection and suggests that USDA include additional study subjects and questions to better understand how D-SNAP can be improved for future disaster response.

A. 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, 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.² The proper

¹The 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.

²Holben, D. (2010). Position of the American Dietetic Association: Food Insecurity in the United States. *Journal of the American Dietetic Association*. 110(9), 1368-1377.

function and funding to maintain food security in disaster situations is critical, especially for our most vulnerable citizens, including children and seniors.

B. Practical Utility of Information Collection

At a time when a global pandemic, raging wild fires and devastating hurricanes are damaging our economy and threatening the food security of millions of Americans, this information collection and sharing of best practices for D-SNAP preparedness and execution is critical. The Academy is particularly concerned about how these events have impacted communities of color. For example, 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. Other natural disasters such as wildfires and hurricanes also disproportionately hurt communities of color.³ These same communities already were far more likely to experience food insecurity. Add rising unemployment and widespread uncertainties about the future, and these current events have only made the situation worse. Federal, state and local communities must be more prepared than ever to handle emergency situations and will benefit from learning from past experiences.

C. Enhancement of the Quality and Utility of the Information Collection

The Academy supports efforts to identify and document best practices in D-SNAP planning and operations from across the country and for a variety of disaster types. The project will give USDA a better understanding of what works when state and local organizations activate to deliver D-SNAP and can be used as a basis to better provide technical assistance to state and local government agencies and allied partners.

After reviewing the study objectives the Academy urges USDA to include the following suggestions into the study design:

Definition of Disaster

As news of the global pandemic began to spread, Congress needed to act swiftly to give local communities the flexibility necessary to ensure food security for its citizens. This resulted in a number of provisions including SNAP waivers allowing for increases in current recipient allotments and the authorization of the Pandemic Electronic Benefit Transfer program. Although these flexibilities did meet many community needs, it was unclear how the D-SNAP program could have complemented these efforts and to what degree they could have been used more effectively if the pandemic was recognized as a disaster scenario that could activate the program. In March 2020, Senator Harris of California introduced the “Pandemic Disaster Assistance Act,” legislation to expand the ability of the Federal Emergency Management Agency (FEMA) to provide financial assistance directly to individuals during a pandemic. According to her office’s press release, “FEMA can only provide individual assistance during natural disasters, such as wildfires,

³ Davies IP, Haugo RD, Robertson JC, Levin PS (2018) The unequal vulnerability of communities of color to wildfire. PLoS ONE 13(11): e0205825. <https://doi.org/10.1371/journal.pone.0205825>.

floods, and earthquakes.”⁴ USDA should develop questions that will help determine the impact of formally designating pandemics as a trigger for D-SNAP activation.

Adequacy of Benefits:

Benefits normally run out for most SNAP households before the end of the month. A quarter of households exhaust their monthly benefits within a week of issuance, and more than half within two weeks.⁵ Given this statistic, the Academy urges USDA to develop questions to better understand the adequacy of the benefit before and after the event.

- Does the type of disaster or degree of individual impact effect the benefit need?
- What other coping strategies do families/individuals employ to make up for benefit inadequacy when a gap exists?

Outreach and Communication of Program:

During a disaster, conventional methods of communication may be disrupted. Planning for how state and local government and allied partners will communicate and support individuals throughout the application process is a key component of a disaster preparedness plan. Yet, Academy members suggest that the funding needed to conduct outreach and communication is often omitted from plans. The Academy suggests that USDA develop questions to capture best practices at the state level to carve out funding for essential activities like outreach and technical assistance for the D-SNAP program.

Additional Study Subjects:

Lastly, the COVID-19 pandemic has illuminated a number of overlooked populations who are at-risk for food insecurity and face challenges to accessing federal nutrition program benefits. An example is the rise in food insecurity on college campuses where students have faced challenges, such as meeting work requirements.⁶ These groups that do not qualify for federal programs often turn to the charitable food network for support. It would benefit USDA to understand who is accessing the charitable food network and why. The Academy recommends that USDA expand the study subject targets to include regional food banks and college and university administrators. These unusual suspects could help shed some light onto best practices from communication and outreach to potential regulation changes that will ensure D-SNAP meets its intended purpose during disaster relief.

D. Conclusion

The Academy appreciates the opportunity to submit comments to the to the U.S. Department of Agriculture related to its information collection, “*Best Practices in Disaster Supplemental Nutrition Assistance Program Operations and Planning.*” We support the

⁴ <https://www.harris.senate.gov/news/press-releases/harris-introduces-legislation-to-expand-access-to-disaster-assistance-during-pandemics>

⁵ Laura Castner and Juliette Henke, “Benefit Redemption Patterns in the Supplemental Nutrition Assistance Program,” USDA Food and Nutrition Service, February 2011, <http://www.fns.usda.gov/benefit-redemption-patterns-supplemental-nutrition-assistance-program>.

⁶ <https://panetta.house.gov/media/press-releases/congressman-panetta-co-introduces-legislation-fight-hunger-college-campuses>

proposed information collection and applaud USDA for engaging in such a timely and important study. We urge USDA to consider including additional questions and study subjects in order to maximize the utility of the information collected. 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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