



Association of State Public Health Nutritionists
PO Box 37094 • Tucson, AZ 85740-7094
[tel & fax] 814-255-2829 • www.asphn.org

May 1st, 2024

The Honorable Debbie Stabenow
Chair
U.S. Senate Committee on Agriculture,
Nutrition, and Forestry
Washington, DC 20510

The Honorable John Boozman
Ranking Member
U.S. Senate Committee on Agriculture,
Nutrition, and Forestry
Washington, DC 20510

The Honorable Glenn Thompson
Chair
U.S. House of Representatives Committee on
Agriculture
Washington, DC 20515

The Honorable David Scott
Ranking Member
U.S. House of Representatives Committee on
Agriculture
Washington, DC 20515

Dear Chair Stabenow, Ranking Member Boozman, Chair Thompson, and Ranking Member Scott:

The Association of Public Health Nutritionists (ASPHN) is comprised of more than 800 public health nutritionists located throughout all 50 states, the District of Columbia and five U.S. territories who are closely involved in the implementation of federal nutrition programs, policies, systems, and environments that support access to a healthy diet. With a significant portion dedicated to federal nutrition programs, the 2024 Farm Bill presents an imperative opportunity to expand the reach and strengthen the implementation of these programs to further public health and equity. Therefore, ASPHN respectfully submits the following remarks for the U.S. Department of Agriculture's (USDA) 2024 Farm Bill.

According to the USDA ERS, 33.8 million Americans experienced food insecurity in 2021, with Black and Hispanic households being disproportionately affected at more than double the rates of white households.¹ A USDA report from 2020 suggests that the average diet quality of Americans across the life span does not align with the Dietary Guidelines for Americans (DGA),² and the US continues to face high rates (6 in 10 US adults) of chronic diseases, with many being diet-related.³ It is critical that USDA prioritizes strengthening nutrition programs as it reauthorizes the farm bill to confront the food and nutrition challenges millions of Americans face.

¹ Coleman-Jensen, Alisha & Rabbitt, Matthew & Gregory, Christian & Singh, Anita. (2022). Household Food Security in the United States in 2021.

² U.S. Department of Agriculture, Food and Nutrition Service, Center for Nutrition Policy and Promotion. 2023. Average Healthy Eating Index-2020 Scores for the U.S. Population - Total Ages 2 and Older and by Age Groups, WWEIA, NHANES 2017-2018

³ Chronic Diseases in America | CDC. Published December 13, 2022. Accessed January 23, 2024. <https://www.cdc.gov/chronicdisease/resources/infographic/chronic-diseases.htm>



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To leverage the 2024 Farm Bill and support food and nutrition security:

ASPHN encourages USDA to expand support for food assistance and nutrition programs to promote equitable access to healthy foods. The integrity of current food and nutrition programs needs to be maintained and aligned with federal guidance. USDA should increase access to healthy foods by prioritizing the purchase of foods recommended by the Dietary Guidelines for Americans and most under-consumed in food programs, such as The Emergency Food Assistance Program (TEFAP), the Commodity Supplemental Food Program (CSFP), and others. We also strongly encourage USDA to increase funding and maintain the integrity of Child Nutrition Programs, such as the Fresh Fruit and Vegetable Program and the Farm to School Program, as these programs ensure access to fresh local foods for children, promote food sovereignty in tribal communities, and connect children to agriculture and communities. Likewise, USDA should continue to support food access initiatives that expand the availability of regionally grown food and sustain policies and programs that ensure the next generation of farmers, including the historically disadvantaged, have access to land, skills, and incentives to grow healthful foods and promote healthy equity.

ASPHN recommends improving Supplemental Nutrition Assistance Program (SNAP) benefit adequacy through revisions of the Thrifty Food Plan; eliminating the cap on the SNAP Excess Shelter Deduction; increasing the earned income deduction; and raising the resource limit for SNAP. SNAP reaches millions of vulnerable Americans facing poverty and hunger. To assure that SNAP benefits are sufficient to pay for the higher cost of healthy food patterns recommended by the Dietary Guidelines for Americans, ASPHN urges the USDA to base allotments on the 2021 revision of the Thrifty Food Plan, with adjustments to the benefit level made semi-annually as opposed to annually. As food inflation and variations in the cost of living can fluctuate and impact SNAP buying power, the Thrifty Food Plan should be reviewed and updated at least every five years to ensure SNAP recipients have access to a healthful, palatable diet. This is particularly important as food insecurity is projected to drive higher rates of five chronic diseases, leading to higher costs for healthcare.⁴

To better meet the needs of SNAP participants, the USDA should address policies that present barriers to adequate benefits and upward mobility, such as the capped shelter deduction, earned income deduction, and asset limits.

⁴ U.S. Department of Agriculture. *Predicted prevalence of five chronic diseases increased as household food security worsened*, 2024. [USDA ERS - Chart Detail](#)

- The shelter deduction is calculated as housing costs that exceed half of the household's net income and is currently capped at \$624 for households without a household member who is elderly or disabled. The cap inequitably serves people across the country living in areas with higher rent and disproportionately hurts families with children who need bigger places to live. Removing the cap for shelter deduction will ease choices too many people face between paying for food and rent.
- Many people who receive SNAP are actively working, yet they still require additional support to help afford nutritious and desirable food for themselves and their families. Increasing the percent deduction on earned income would support people who work in moving toward economic mobility and mitigating some of the harms of benefits cliffs.
- SNAP is a critical support to assist in meeting people's basic needs while they work to acquire the resources they need for upward mobility. By creating strict asset limits, SNAP is removing the ability for households to acquire savings that can help them weather future storms and build economic security for themselves and their families – ultimately leading to an increased reliance on SNAP. Raising asset limits to a level that ensures people are transitioning off SNAP at a point of economic stability for their household will better position individuals for long-term success.

ASPHN believes it is especially important for USDA to protect and strengthen equitable access to SNAP and other federal nutrition programs. Prioritizing equitable access to food and nutrition requires eliminating discriminatory eligibility requirements that limit SNAP participation and increasing access to all Farm Bill programs among socially disadvantaged populations. This includes:

- Granting simultaneous participation in SNAP and the Food Distribution Program on Indian Reservations (FDPIR), empowering tribal nations to administer all Farm Bill programs through 638 Authority, and enabling expansion of Native-grown and culturally relevant food procurement options in federal nutrition programs;
- Providing authorization and funding for American Samoa, the Northern Mariana Islands, and Puerto Rico to transition from the Nutrition Assistance Program (NAP) to SNAP. This transition should allow for flexibility guided by each territory's administration in making culturally appropriate purchases and local food purchasing requirements;
- Protecting and expanding access to SNAP for military members and their families, college students, immigrants, individuals with disabilities, and formerly incarcerated individuals. The full potential of SNAP to promote the public's health cannot be fully realized if it is not obtainable by all;

- Making the Local Food for Schools, Local Food Purchase Assistance Cooperative Agreement, and the School Food Transformation grants permanent and continue to prioritize funding for farmers and producers of color and increase access to local, culturally relevant foods.

ASPHN supports ending the prohibition on use of SNAP benefits to purchase hot prepared foods from food retailers. Restricting SNAP participants from using benefits for convenience foods, like hot prepared meals, contributes to inequitable access to healthy foods, disproportionate burdens (e.g., more time and effort to prepare meals), and increased stigma for SNAP participants.⁵ The proposed change would afford SNAP customers broader choices available to other food shoppers.

ASPHN encourages robust stocking and marketing standards for SNAP-authorized retailers to promote healthier in-store and online retail food environments. Stronger stocking standards would require SNAP retailers to stock an increased variety of staple foods and perishable items, including religious and culturally-appropriate nutritious options. We encourage collaborative efforts with SNAP-Ed, the Centers for Disease Control and Prevention (CDC), farmers, retailers, grocers, and other stakeholders to align strategies to improve healthier options in retail spaces.

To drive demand for healthier options, USDA should 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. Additionally, 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.

As online grocery shopping becomes more prevalent, it is important to expand and evaluate the impact of the SNAP online purchasing program on many factors: assess barriers and facilitators for SNAP recipients and retailers, program awareness, technological issues, USDA technical assistance for retailers, and impact on diet quality and nutrition security. The evaluation of the program can help identify the best online ordering mechanism and delivery approaches, especially for those with limited access to transportation, as SNAP benefits do not cover

⁵ John S, Johnson J, Nelms A, Bresnahan C, Tucker AC, Wolfson JA. Recommendations to Promote Healthy Retail Food Environments: Key Federal Policy Opportunities for the Farm Bill. Center for Science in the Public Interest. 2023. Available at: [https:// www.cspinet.org/resource/report-title-recommendations-promote-healthy-retail-foodenvironments](https://www.cspinet.org/resource/report-title-recommendations-promote-healthy-retail-foodenvironments).

delivery fees or tips to drivers. These actions can empower SNAP recipients to make choices in-store and online that better their health and nutrition.

ASPHN recommends further incentivizing healthier food purchases. Opportunities to expand healthy incentives exist within the Gus Schumacher Nutrition Incentive Program (GusNIP). GusNIP increases fruit and vegetable access and intake by providing financial incentives for purchasing produce to people participating in SNAP. Increasing funds to continue the national expansion of GusNIP 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 can advance the equity and reach of GusNIP.⁶

There is also an opportunity within the private sector to incentivize healthy food choices. USDA should build on the popularity and results of GusNIP, the Fruit and Vegetable Prescription Program, and other USDA initiatives such as the school-based Fresh Fruit and Vegetable Program, to encourage private-sector funding of purchasing incentives. Modify or waive the Equal Treatment Provision to allow retailers to offer discounts and price breaks on all fruits and vegetables – fresh, frozen, canned, dried, and 100% juice – to SNAP customers. These actions to expand healthy incentives within GusNIP and the private sector empower choices in line with federal nutrition guidelines.

ASPHN encourages increased investment in nutrition education through funding, equitable and inclusive policies, and research and evaluation for SNAP-Education. SNAP-Ed aims to achieve the USDA's vision for the Dietary Guidance for Americans and eliminate related disparities in low-income communities through education, social marketing, and policy, systems, and environmental (PSE) approaches that promote healthy eating and physical activity in low-resource settings through the entire lifespan. The Farm Bill presents an important opportunity to optimize SNAP-Ed's support of underserved populations.

Increasing SNAP-Ed program funding allows the program to reach a larger proportion of the 90 million people eligible for SNAP-Ed and fill equity gaps by increasing funds for state SNAP-Ed programs. The 2010 Healthy, Hunger-Free Kids Act (HHFKA) capped SNAP-Ed funds at the 2009 base, nearly doubled the SNAP-Ed audience and expanded the scope of services to include comprehensive, multi-level interventions using community and public health approaches. The number of State-level Implementing Agencies (SIAs) grew from about 100 to 175 by 2023, adding more diverse, though often smaller programs, and – in many cases – causing established programs to contract. Increase SNAP-Ed grants to at least \$900 million, equivalent to \$10 per

⁶ Advancing Equity in the Gus Schumacher Nutrition Incentive Program (GusNIP): Opportunities in the 2024 Farm Bill. Center for Science in the Public Interest and Healthy Food America. Available at: https://www.cspinet.org/sites/default/files/2024-02/GusNIP_farmBillEquity_factSheet_Final_Updated.pdf

income-eligible person each year, to expand services and allow more organizations to participate; restore capacity and provide parity with growth among the 13 states that lost significant funding due to the 2010 HHFKA reallocation process, 2014-2018; staff up teams and allow more time dedicated to program planning and evaluation with their implementing agencies; and advance SNAP-Ed 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.

Historically Black and Tribal colleges (1890 and 1994 Land Grant Universities), tribal-serving organizations, and other minority-serving non-profits can reach under-served communities, but few participate in SNAP-Ed. USDA should promote, fund, and aid technical assistance for community-driven, culturally responsive nutrition education programs. This includes

- Training a diverse workforce on the skills needed to engage the community in the development, implementation, assessment, and evaluation of nutrition education initiatives to advance equity and inclusion in nutrition education programs and policies;
- Applying 638 Authority – including self determination and self-governance – to Tribal Nations who choose to run their own SNAP-Ed programs, and ensuring adequate, culturally relevant technical support; and
- Funding more peer-driven state and regional Black and tribal collaborations.

Resources should also be dedicated to evaluation, including developing metrics for food and nutrition security, physical activity, and organizational, and community change suitable for e-reporting using the comprehensive SNAP-Ed Evaluation Framework. Dedicating resources for SNAP-Ed evaluation can also help to better understand best practices for measuring and achieving health outcomes for the growing number of SNAP-Ed activities that focus on virtual services and policy, systems, and environmental interventions. Additionally, USDA should invest in an evaluation to understand current overlap and opportunities for alignment across programs such as SNAP-Ed, WIC, and EFNEP to both decrease administrative burden for states and customers, as well as contribute to better health outcomes in the long term.

ASPHN suggests a stronger approach to SNAP's public health impacts before, during, and after natural disasters. COVID-19 waivers allowed states to temporarily waive various components of SNAP operations to facilitate access to the program, including by extending certification periods and relaxing reporting and interview requirements. We suggest allowing for automatic triggers of the successful COVID-19 waivers during emergencies to provide flexibility in meeting unexpected nutrition-related community needs in rapid response to disasters or public health emergencies.



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Conclusion: ASPHN urges USDA to expand support and funding for federal nutrition programs to help individuals and families afford nutritious foods. Implementing stronger stocking standards and marketing practices among SNAP-retailers, furthering healthy food incentives, and investing in nutrition education encourages healthier retail food environments could increase diet quality by making it easier for shoppers to make dietary choices that support their health. To enable vulnerable populations to access and benefit from nutrition programs like SNAP, facilitate collaboration and coordination among federal agencies, tribal governments, and relevant stakeholders. Evaluation of existing program policies can streamline program administration and delivery to effectively and equitably serve those facing hunger and poverty.

Thank you for your consideration of our ASPHN comments. The 2024 Farm Bill is a momentous opportunity to strengthen the role of nutrition programs in addressing public health inequities, food and nutrition insecurity, and health disparities in America. The members and staff of ASPHN are available to discuss further these comments.

With regards,

Becky Adams, DrPH, RD, CDE
President, ASPHN Board of Directors

Melissa M. Lonsberry, MS RDN
President-Elect, ASPHN Board of Directors