

June 30, 2021

Submitted via FNS.FoodPlans@usda.gov

U.S. Department of Agriculture
1400 Independence Avenue SW
Washington, DC 20250

RE: Review of the Thrifty Food Plan and SNAP Benefits

I am writing on behalf of RESULTS in response to the Department of Agriculture's (USDA) Request for Public Input regarding Supplemental Nutrition Assistance Program (SNAP) benefits calculations and the Thrifty Food Plan (TFP). RESULTS believes that equitable and accessible federal nutrition programs lay the groundwork for strong, poverty-free communities. We must ensure that SNAP recipients are provided with the necessary benefits to purchase healthy, culturally relevant meals allowing them and their families to thrive without hunger or food insecurity. As an anti-poverty organization that supports grassroots volunteers across the country, our network has witnessed firsthand how inadequate SNAP benefits force many families to scrape together unhealthy, unfulfilling foods at the end of the month in order to stave off hunger.

RESULTS creates the public and political will to end poverty by empowering individuals to exercise their personal and political power for change. We support a network of more than 90 chapters with over 650 active volunteers (and an additional 7,000 members in our e-mail action network) across the U.S. Our grassroots members educate Congress and their staff, work with the media, and build awareness within their communities of the policies that influence everything from nutrition and health to the budget and taxes.

We commend USDA for beginning to review the Thrifty Food Plan. However, more work must be done to address the numerous inadequacies and false assumptions that plague the current SNAP benefit calculation process. In order to address these inadequacies in ways that uplift SNAP, we strongly encourage USDA to account for the following issue areas shared by RESULTS Experts on Poverty and other SNAP recipients:

- **Unrealistic assumptions regarding food availability and affordability.** The TFP falsely assumes that families across all geographies have equal, consistent access to grocery stores and transportation in order to purchase food. These assumptions reduce the impact of SNAP benefits for participants in areas with higher costs of living or who live in rural and remote settings with higher transportation costs associated with food by failing to account

for the unique geographic circumstances that lessen the impact of each SNAP dollar. Moreover, food availability around the country varies drastically and is inherently racialized, due to structural practices that have created community segregation witnessed around the United States. The convergence of lack of food availability and racialized segregation of communities has been described by advocates as [“food apartheid.”](#) Failure by USDA to account for food apartheid reinforces inequities of food access for SNAP recipients of color, most especially.

- **Unreasonable assumptions regarding time and capacity to prepare food.** The TFP also uses unrealistic assumptions regarding how frequently individuals and families are cooking from scratch. Not only do these assumptions negatively impact people with disabilities for whom cooking from scratch poses additional physical burdens, but such assumptions do not account for the time requirements for families juggling unpredictable work schedules, lack of access to child care, and many other challenges. During the 2021 [RESULTS International Conference](#), SNAP participants from RESULTS [Experts on Poverty](#) cohort [shared](#) how these assumptions unfairly target people with disabilities, limiting the impact of SNAP for these households. Put together, each of these assumptions have negative implications for SNAP participants simply seeking to put food on the table for themselves and their families.
- **Assumptions regarding cooking and food storage facilities.** The TFP assumes consistent and equal access to all the resources needed to purchase and prepare foods for every household. However, many families live in places without proper cooking facilities or food safe storage options. These families face the impossible choice of choosing between buying in bulk at lower prices and risk spoilage or paying higher costs for smaller amounts that will be used in its entirety before rotting.
- **Ignores special dietary needs.** Because the TFP relies on uniform consumption habits and lacks necessary variety, it is even more poorly designed to account for individual dietary restrictions or medical requirements. For families with individuals with serious health conditions such as diabetes or Celiac disease, the TFP does not recognize or adjust for the higher associated costs of their required diets. Outside of restrictions, the uniform food list also fails to provide culturally appropriate meals and food options. In turn, many families are forced to disconnect from their culinary heritage in order to stave off hunger through SNAP.
- **Lacks healthy variety.** [Analysis](#) by Food Research & Action Center (FRAC) found that USDA market baskets for the TFP are comprised of the same fruits and vegetables, lacking variety as recommended by government nutrition standards.

- **Impractical lists of food.** The TFP is calculated using 15 age-gender market baskets that inaccurately assumes consumption habits for different age ranges. USDA uses these market baskets to create lists of food, including amounts that a family should expect to consume weekly. However, the market baskets for the TFP include quantities that are both improbable purchases from a supermarket and impractical for a family. [For example, a family of four under the TFP is expected to eat approximately 2.1 ounces of “all cheese” in a singular week; this is roughly equivalent to two slices of cheese for a family of four per week.](#) Measurements of this manner are unreasonable, in addition to the absurd, minute quantities of food to be shared amongst a family.
- **Underestimates food waste.** USDA calculations for the TFP [only allows for five percent of food waste](#), including inedible portions of food such as bones or peelings. However, recent research found that, at a minimum, all households were [wasting at least 8.7 percent of food](#). This underestimating of food waste in the TFP means SNAP households struggle to have enough food through current calculations, despite research [demonstrating](#) that low-income households waste food less than higher income households.
- **[Discourages saving](#) due to asset limits.** At the 2021 RESULTS International Conference, SNAP participants in our network [shared](#) the negative impact of asset limits on their ability to create savings and move out of poverty. Default asset limits for SNAP requires participants to [have less than \\$2,250 \(or \\$3,500 if a household member is elderly or disabled\)](#) in countable assets, such as bank accounts, in order to be eligible to participate in the program. States can relax these assets limits, and many have done so. However, these asset limits still force hundreds of families to choose between saving money and feeding their family each month.
- **Fails to address the “benefits cliff”.** The [“benefits cliff”](#) occurs when participants of anti-poverty programs earn a raise and then discover that they make too much money to continue receiving benefits. Often, these measly increases in compensation do not equate to the hundreds or thousands of dollars of public benefits the family was receiving. The inadequacy of the TFP further exacerbates the benefits cliff, forcing many individuals into the precarious situation of choosing between a raise and access to pivotal nutrition programs that feed their families.

RESULTS recognizes that the critical role SNAP plays in addressing hunger and food insecurity in our communities. Ending hunger and poverty, which lies at the heart of our work, begins with ensuring equitable and accessible SNAP benefits that provide families with the food they need to last the month. By addressing the inadequacies and inequitable practices above, USDA will be laying the foundation to seriously address the COVID-19-related spikes in hunger and

food insecurity. In conclusion, we request that our comment be considered part of the formal administrative record.

Thank you for the opportunity to submit comments. Please do not hesitate to contact me if you have any questions or need any further information.

Sincerely,

A handwritten signature in cursive script, appearing to read "Max De Faria", enclosed within a light, hand-drawn oval.

Max De Faria

Bill Emerson National Hunger Fellow

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