



June 28, 2021

SNAP Program Design Branch
Program Development Division
Food and Nutrition Service
3101 Park Center Drive
U.S. Department of Agriculture
Alexandria, VA 22302

Re: USDA Review of the Thrifty Food Plan

Dear SNAP Program Design Branch:

We appreciate the time the USDA has taken thus far to engage key stakeholders and this opportunity to share our comments on the Thrifty Food Plan (TFP) to ensure the Supplemental Nutrition Assistance Program (SNAP) benefits provide adequate resources to households to support a healthy diet. The Alliance to End Hunger unites a diverse coalition of nearly 100 members—non-profits, corporations, faith-based organizations, universities, foundations, international organizations, and individuals—all with a shared goal of ending hunger.

SNAP has proven to be critically important for individuals and families who have fallen on hard times due to COVID and the temporary 15 percent boost in benefits has been a lifeline as individuals get back on their feet. However, normal SNAP benefit levels often fall short of adequately meeting the nutritional needs of low-income individuals even in times of more certainty. The goal of the TFP is to provide nutrition to individuals that supports a healthy diet, but a key barrier to achieving this goal is the low-cost nature of the food plan. Unrealistic assumptions behind the TFP has caused SNAP benefit levels to fall short of supporting a healthy diet for low-income individuals.

Fortunately, previous investments in SNAP resulted in promising reductions in food insecurity and can be used as basis for supporting a permanently increased SNAP benefit level that adjusts as the cost of purchasing and preparing food changes. Further, research and data point to areas of the TFP assumptions that could better reflect actual costs of food and how the average American purchases and consumes food. The following research and recommendations will better help the TFP meet its goal of providing adequate nutrition to low-income families.

Previous boosts to SNAP benefits have resulted in decreased food insecurity among low-income households.

In response to the 2008 economic recession, Congress passed the American Recovery and Reinvestment Act (ARRA) of 2009 that included an initial 13.6 percent increase to the maximum SNAP benefit. The boost in benefits were terminated in 2013, however in just the short time between December 2008 (pre-ARRA) and December 2009 (about eight months post-ARRA), the increased resources resulted in a 2.2 percent decrease in food security among low-income households.ⁱ

A USDA report examining the boost to benefits during ARRA and its impact on food spending behaviors also found that “SNAP benefits provided a larger boost to food expenditure share than an equal amount of cash” indicating that SNAPs targeted benefits ensure more low-income households can allocate resources towards food.ⁱⁱ Another USDA report found that households exhausted their SNAP benefits later in the month than before, likely because increased SNAP benefits stretched further for households.ⁱⁱⁱ

The TFP assumptions that determine SNAP benefit levels should be based on nutrient standards, food group requirements, and feedback from those with lived experiences.

According to an analysis of the TFP by the Food Research & Action Center (FRAC) it was determined that the food plan is based off an impractical list of foods that does not meet the variety of foods recommended by the Dietary Guidelines for Americans; nor accounts for the time and facilities needed to prepare healthy meals; and unrealistically assumes food availability and affordability.^{iv}

According to USDA’s 2006 TFP report, the TFP falls short of meeting all key dietary standards or account for varying family makeup and dietary needs. While the food plan meets many recommended nutrition needs, it does not meet nutritional guidelines for sodium, potassium, and vitamin E.^v

The TFP does not account for the variety of foods the average individual consumes. The foods included in determining SNAP benefit levels are required to be low cost rather than based on how individuals consume food and recommended dietary guidelines. This results in a discrepancy between the cost of purchasing food for a well-rounded diet and the SNAP benefits administered to participants.^{vi}

The SNAP benefit level determined by the TFP must be adequate so households can purchase high-quality and nutritious foods for the entire duration of the month.

The current SNAP benefit level falls short of how much typical household may need to support a healthy diet. SNAP participants who are food insecure report needing \$10 to \$20 more per person each week to purchase the meals they need. Researchers also

estimate that for a household to purchase nutritious meals they would need \$11 more per person each week.

Additionally, a quarter of all households use an entire month of SNAP benefits within the first week, and more than half of participants exhaust their benefits within the first two weeks.^{vii} Research suggests that running out of SNAP benefits may negatively impact participants' health and educational success. Studies find that among households participating in SNAP, hospital admissions and behavioral issues at school rise, and student test scores falls when SNAP benefits run out. Further, studies observe declines in caloric intake, dietary quality, frequency in eating and food shopping as SNAP benefits run out.^{viii}

A shortcoming of the TFP and the SNAP benefit level is that it does not account for the time required to shop for food and prepare meals that support a healthy diet. The TFP assumes that SNAP recipients will purchase basic, inexpensive, unprocessed ingredients which requires a substantial time investment to cook a healthy meal. According to an analysis of the TFP by the Institute of Medicine “the time requirements implicitly assumed by the TFP are inconsistent with the time available for most households at all income levels, particularly those with a single working head. By failing to account for the fact that SNAP participants, like other households, need to purchase value-added foods that save preparation time, the current value of the SNAP allotment substantially limits the flexibility and purchasing power of SNAP benefits.”^{ix} SNAP benefits do not cover the cost of purchasing more convenient and often more expensive processed foods that the average American consumes.

National average food price data do not capture regional variation.

An analysis performed by the Urban Institute confirmed that food prices vary widely across all communities, in all geographic regions, whether small or large, urban, or rural. Further the study found the SNAP benefit does not cover the cost of a low-income meals in 99 percent of counties within the continental US states and Washington, DC.^x The TFP must have the ability to adjust to reflect the variation in the cost of living and food in different areas of the country.

A 2011 Children's HealthWatch study found that the overall average monthly cost of the foods included in the TFP shopping list in surveyed stores in Philadelphia was 29 percent above the maximum SNAP benefit. This translated to a \$196 monthly shortfall for families who receive the maximum monthly SNAP benefit in 2011. One factor driving the discrepancy is that the TFP does not account for the cost of buying foods as small stores rather than large grocery stores. Small stores are a primary source of food in many low-income communities, but they are also more expensive. According to the study, relative to large stores, the price of the TFP market basket was \$167 more at small stores.^{xi}

Further, there is evidence that suggests low-income households face higher costs when trying to access nutrition. Low-income and minority individuals are more likely than

other groups of people to have limited access to supermarkets and other large grocery stores that offer a broad range of affordable and nutritious foods. Additionally, lack of transportation is another common barrier to access affordable and healthy nutrition.^{xii}

Evidence strongly supports the effectiveness of SNAP in reducing poverty and food insecurity and improving health and nutrition for participants.

Providing adequate SNAP benefits will have long-lasting impact greater than just providing a meal for an individual on a given day. Adequate SNAP benefits will ensure that no low-income household must choose between feeding their family or paying their bills resulting in better health, nutrition, and success for SNAP participants. The Alliance to End Hunger strongly recommends updating the assumptions that dictate the TFP and therefore increase SNAP benefit levels to ensure households have access to the nutrition they need throughout the entire month. Thank you for the opportunity to provide comments on this important issue.

Sincerely,



Eric Mitchell
Executive Director
Alliance to End Hunger

ⁱ https://www.ers.usda.gov/webdocs/publications/44837/7469_err116.pdf?v=9771.7

ⁱⁱ https://www.ers.usda.gov/webdocs/publications/74686/60328_err213.pdf?v=9500.6

ⁱⁱⁱ <https://fns-prod.azureedge.net/sites/default/files/ARRASpendingPatterns.pdf>

^{iv} <https://frac.org/wp-content/uploads/snap-initiatives-to-make-snap-benefits-more-adequate.pdf>

^v https://fns-prod.azureedge.net/sites/default/files/usda_food_plans_cost_of_food/TFP2006Report.pdf

^{vi} <https://www.cbpp.org/sites/default/files/atoms/files/7-30-19fa.pdf>

^{vii} <https://www.cbpp.org/sites/default/files/atoms/files/7-30-19fa.pdf>

^{viii} <https://frac.org/wp-content/uploads/snap-initiatives-to-make-snap-benefits-more-adequate.pdf>

^{ix} <https://fns-prod.azureedge.net/sites/default/files/ops/IOMSNAPAllotments.pdf>

^x <https://www.urban.org/research/publication/how-far-do-snap-benefits-fall-short-covering-cost-meal>

^{xi} https://childrenshealthwatch.org/wp-content/uploads/phila_rcohd2_report_nov11.pdf

^{xii} <https://fns-prod.azureedge.net/sites/default/files/ops/IOMSNAPAllotments.pdf>