



July 15, 2021

Elizabeth C. Archuleta  
Director  
Office of Intergovernmental & External Affairs  
U.S. Department of Agriculture  
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Dear Director Archuleta:

The Alliance to End Hunger engages diverse institutions to build the will to end hunger at home and abroad. We are a coalition of about 100 corporations, non-profits, faith-based organizations, universities, foundations, international organizations and individuals working as a collective.

We have been addressing racism as a root cause of hunger through our “hunger is a racial equity issue” initiative. We educate anti-hunger organizations, provide technical assistance and promote policies to reduce hunger and improve nutrition using a racial equity lens.

We appreciate the opportunity to comment on how USDA can work to advance racial justice and equity.

First, we acknowledge and applaud the Biden Administration’s focus on correcting the long-standing effects of systemic racism in America as laid out in the Executive Order *On Advancing Racial Equity and Support for Underserved Communities Through the Federal Government* issued on January 20, 2021. The order proclaims, “Our Nation deserves an ambitious whole-of-government equity agenda that matches the scale of the opportunities and challenges that we face.”

Additionally, President Biden acknowledged the impact of systemic racism at the 100-year anniversary of the Greenwood, Tulsa race massacre. At that time President Biden pronounced, “that hate became imbedded systematically and systemically in our laws and our culture” influencing American institutions to this day.

We appreciate USDA’s work to date on addressing racial inequities, including the historic \$4 billion in debt relief funds provided through the American Rescue Plan Act of 2021 meant for socially disadvantaged Black/African American, American Indian or Alaskan native, Hispanic or Latino, and Asian American or Pacific Islander farmers.

We applaud the Administration for reinstating SNAP benefits for formerly incarcerated individuals convicted of a drug-related felony. Recognition that this policy disproportionately impacted Black, Indigenous and people of color (BIPOC) individuals due to higher rates of arrest, conviction and incarceration for drug-related felonies due to systemic racism is a good example of using a racial equity

framework to correct policies that unintentionally create disparate outcomes among community members.

We are recommending the following steps for USDA to continue and deepen its efforts to address historically imbedded inequities.

**1. USDA should collect and report program data by race and ethnicity where appropriate.**

Lack of data has consistently hampered efforts to determine the impact of USDA programs among BIPOC individuals in the U.S. We appreciate that the executive order calls for the establishment of an Equitable Data Working Group (sec.9). Also, more nuanced analysis of collected data would be helpful. For example, the USDA annual household food security report publishes data that is disaggregated by race or by household type, but there is no information on how they relate to each other, such as the food insecurity profile of female-headed households by race. Such analyses would help to better target needed interventions.

**2. USDA should undertake review of all FNP's programs to assess disparate racial outcomes for underserved communities.**

Assessing federal nutrition programs for potential disparate outcomes among BIPOC communities is an essential step in correcting past and current injustices and inequities. To ensure that federal nutrition programs are effective and able to achieve their intended purposes in all communities, policies and programs must be examined for any implicit bias. A good example of how to conduct such an analysis is Bread for the World's [Applying Racial Equity to U.S. Federal Nutrition Assistance Programs: SNAP, WIC and Child Nutrition](#). We suggest the recommendations in this report be adopted.

**3. USDA should direct state agencies to collect data on program access barriers from local jurisdictions and program participants.**

The above-referenced report concludes that federal nutrition programs are for the most part racially-equitable. However, having a program or policy that seems free from bias in law and regulation, does not preclude implementation that results in biases or differential outcomes. Examining how programs and policies are implemented on the ground, will identify areas for improvement. It will also expose how seemingly race-neutral policies can have racially-biased outcomes. For example, a policy like promoting breast-feeding through WIC will not have the desired impact if WIC staff do not account for the much lower rate of breast-feeding among African Americans due to structural racism and historical trauma (see afore-mentioned Bread for the World report).

Having these assessments at the local level are critical in assessing barriers that are specific to the communities in questions. For example, New York City in 1999 was found to be instituting practices that delayed or denied persons from seeking Food Stamp benefits. A class action lawsuit eventually brought an end to this practice.

It also will make it easier to identify barriers that are outside of the province of USDA programs, recognizing the interrelated nature of systemic racism. For example, underutilization of a federal nutrition program in a community of color may result from transportation barriers or other obstacles outside of USDA's purview. In a case like this involving other community stakeholders and agencies would be critical to resolving the issue.

Finally, the best source of information about barriers to access or discriminatory treatment will come from program participants. We appreciate that the Executive Order (Sec. 8.) calls for “Engagement with Members of Underserved Communities.”

**4. USDA should train all employees in diversity, inclusion, equity and culturally competent practices.**

The beginning of supporting an environment of anti-racism is to ensure all staff are properly trained and supporting that training through policy, practice and accountability mechanisms. USDA employees as well as program participants report bias in their interactions with the agency. According to USDA, “Race was the second most frequently alleged basis in formal equal employment opportunity (EEO) complaints at USDA in FY 2020. In FY 2020, 43 percent of complaints cited race as a basis, compared to 55 percent in FY 2019.”

**5. USDA should direct resources and outreach to historically underserved communities.**

To address the inequities identified through these processes, USDA should plan to direct resources to assist underserved communities through outreach, enrollment and removing barriers to equitable participation.

Thank you for your attention. The Alliance to End Hunger stands ready to assist you in USDA’s efforts to improve food security and nutrition in BIPOC communities across the U.S.

Sincerely,

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