



June 8, 2021

Secretary Thomas Vilsack
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

Dear Secretary Vilsack,

The Food Research & Action Center (FRAC) appreciates the opportunity to comment on the U.S. Department of Agriculture's (USDA) efforts to revise and secure a permanent change to the Thrifty Food Plan (TFP). FRAC improves the nutrition, health, and well-being of people struggling against poverty-related hunger in the United States through advocacy, partnerships, and by advancing bold and equitable policy solutions.

FRAC recognizes that this revision to the TFP is long overdue and critically important for the Supplemental Nutrition Assistance Program (SNAP). Congress instructed USDA in the 2018 Farm Bill to update the TFP by 2022 and, since that time, FRAC has been calling for and eagerly waiting for action to be taken. FRAC applauds the Biden Administration's urgent attention to this important matter, as detailed in the COVID Economic Relief Executive Order.

This comment letter is organized into four sections:

- SNAP Benefit (In)adequacy;
- FRAC's Analysis of the TFP;
- Institute of Medicine's Analysis of SNAP Benefit Adequacy; and
- Additional Considerations.

SNAP Benefit (In)adequacy

The monthly SNAP allotment is based on the TFP, which was last updated in 2006. Since that time, research shows that SNAP recipients cannot afford the plan and an adequate diet with their SNAP allotment.¹ Benefits for most households are not enough to get them through the entire month without hunger or being forced to sacrifice

¹ For a review of SNAP benefit inadequacy, including the impact of more adequate benefits, see: Hartline-Grafton, H., Weill, J., & Vollinger, E. (2019). *Supplemental Nutrition Assistance Program: Initiatives to Make SNAP Benefits More Adequate Significantly Improve Food Security, Nutrition, and Health*. Washington, DC: Food Research & Action Center. Available at: <https://frac.org/research/resource-library/supplemental-nutrition-assistance-program-initiatives-to-make-snap-benefits-more-adequate-significantly-improve-food-security-nutrition-and-health>

nutrition quality. This is true despite the fact that SNAP participants use a variety of savvy shopping practices to stretch their limited food dollars.

SNAP is a profoundly important program, with well-documented benefits to economic security, food security, health, and well-being.² However, the inadequacy of SNAP benefits severely limits the program's ability to do even more. SNAP benefits are inadequate, in part, because they are based on USDA's impractical and flawed TFP.

FRAC's Analysis of the TFP

Nearly a decade ago, FRAC conducted a comprehensive review of the 2006 TFP and outlined the most substantial weaknesses of the plan and its use in SNAP. These weaknesses are still relevant today given the inaction, until recently, on revising the plan. The TFP

- includes impractical lists of foods;
- lacks the variety called for in the Dietary Guidelines for Americans;
- unrealistically assumes adequate facilities and time for food preparation;
- unrealistically assumes food availability;
- unrealistically assumes food affordability;
- underestimates food waste;
- unrealistically assumes adequate, affordable transportation;
- is exacerbated in its inadequacy by SNAP benefit calculations;
- costs more than the SNAP allotment in many parts of the country;
- ignores special dietary needs; and
- its purchasing power has eroded over time.

As noted in FRAC's report, the implications of these weaknesses for SNAP beneficiaries are that

... there is no margin of error included within the TFP, which demands perfection across a range of household tasks, access to resources, and other attributes. Everything must be perfectly aligned for the TFP to work as intended – a person needs: access to a store (or multiple stores to bargain hunt) with a wide variety of foods at very competitive prices; transportation to the store; adequate resources to use at the store throughout the month; adequate and reliable storage space and cooking equipment; sufficient time for food preparation; less waste and spoilage than is commonly accepted as the norm; and so on. Low-income households have no buffers when things go – even slightly – off this course, as they typically do in one respect or another in the real world for families of all income levels. More and more demands for perfection are

² For a review of SNAP's effectiveness, see: Hartline-Grafton, H. (2017). *The Role of the Supplemental Nutrition Assistance Program in Improving Health and Well-Being*. Washington, DC: Food Research & Action Center. Available at: <https://frac.org/research/resource-library/snap-public-health-role-supplemental-nutrition-assistance-program-improving-health-well%E2%80%90being-americans>

made on the low-income family. The result is a type of Potemkin village: a TFP that is an artificially constructed model that obscures the reality of the impossible struggles of low-income people.

A brief description of the TFP weaknesses identified in the FRAC report follows. USDA should refer to FRAC's full analysis (attached as Appendix A) for additional details and references. ***In the process of revising the TFP, FRAC urges USDA to eliminate, or at least mitigate, the weaknesses identified and described in the FRAC analysis.***

The TFP includes impractical lists of foods. The TFP market baskets are in terms of pounds of food per week. To FRAC's knowledge, the baskets still have not been translated into practical shopping lists or menus for consumers. The market baskets also contain such small quantities of some foods, especially prepared foods, that the amounts are impractical and often meaningless for normal use. For instance, the weekly market basket for a reference family of four allots approximately 2.1 ounces of "all cheese" – which translates to about two slices of cheese for a family of four for a week.

The TFP lacks the variety called for in the Dietary Guidelines for Americans. For example, fruits in the baskets are comprised mostly of apples, bananas, oranges/orange juice, and watermelon; the primary vegetables include potatoes, carrots, cabbage, and dark leafy greens; and the main fish are canned tuna and canned salmon. The overall lack of variety over time leads to a potentially monotonous, unpalatable diet, and is inconsistent with federal dietary guidance.

The TFP unrealistically assumes adequate facilities and time for food preparation. Inherent in the TFP market baskets is the assumption that people have adequate and safe facilities for food storage and preparation. The reality is that some low-income families cannot afford the up-front costs for appliances or utensils that the TFP assumes they have, or they may struggle to pay utility bills. In addition, the TFP frequently is criticized for requiring an unrealistic amount of time for food preparation (often from scratch), including the time necessary to shop for food at the right price, compare prices, prepare food, and clean up after a meal. USDA reports incorporating more convenience foods and "somewhat" fewer foods prepared from scratch in the 2006 revision of the TFP compared to the 1999 version; however, a number of research studies have demonstrated that the time needed to prepare foods to achieve the TFP is higher than social norms and practices.

The TFP unrealistically assumes food availability. Even in normal commercial environments, the TFP market baskets are so constrained that purchasing all or most of the components can be very difficult. Research shows that obtaining an adequate diet with the TFP is challenging because of the minimal availability of stores offering foods to fill a TFP market basket. This is especially true for fresh fruits and vegetables, whole grain products, low-fat dairy products, fish, and lean meat.

The TFP unrealistically assumes food affordability. Part of the reason why SNAP benefits are insufficient for many participants is that healthy food to meet the

TFP guidelines, if even available, is often more expensive in low-income communities. This is particularly true for fruits and vegetables. As a result of food affordability issues, households with limited resources to buy enough food may try to stretch their food budgets by purchasing inexpensive, calorie-rich foods that are filling.

The TFP underestimates food waste. Since the early 1980s, USDA has used a food waste factor of 5 percent in the TFP market baskets to account for food lost to spoilage, spillage, or plate waste. (The food waste factors for the three higher-cost USDA Food Plans range from 10 to 30 percent.) The current food waste factor for the TFP is outdated and too low. Although any level of food waste is undesirable, it is unrealistic to ignore this issue given the nature of food shopping and preparation that result in some waste for households.

The TFP unrealistically assumes adequate, affordable transportation. Meeting the TFP guidelines is especially challenging for the many households in low-income communities without vehicle access. Shopping frequency may increase – and the ability to buy in bulk decrease – because of limits on how much can be carried when walking or using public transit. Some consumers, especially in rural communities, also may be limited to one large shopping trip a month when they buy the majority of their monthly food purchases. This requires ample food storage space and may restrict the types of products that can be purchased. Furthermore, transportation costs cut into the already limited resources of SNAP households, and these costs can be substantial.

The TFP is exacerbated in its inadequacy by SNAP benefit calculations. One problem is that the timing of the annual SNAP cost of living adjustment by definition means that the actual SNAP allotment is almost always less than the TFP. While the SNAP benefit allotment is adjusted for inflation each year, the increases come only after a time lag, adjusted in October for inflation through the prior June. Furthermore, SNAP benefit allotments are calculated based on household income, resources, and size. The many families with earnings, Social Security, or other forms of income are assumed to be able to use some of that income for food, so they receive less than the maximum SNAP allotment. This adjustment is in theory logical, but the computation of the share of a family's income available for food is so flawed that it frequently leads to unjust outcomes for those with high medical bills or shelter costs. The end result is that SNAP households often are assumed to have money for food that actually is going to medical or shelter costs.

The TFP costs more than the SNAP allotment in many parts of the country. The TFP is based on a national average of food prices, but food prices vary widely across the nation. As a result, higher food prices in many communities – especially urban areas – make it difficult to meet TFP guidelines and afford a healthful diet, because SNAP consumers have less purchasing power with their program benefits. In short, SNAP beneficiaries trying to follow the TFP will necessarily fall short if faced with prices that are higher than the national average.

The TFP ignores special dietary needs. The TFP market baskets do not account for the additional nutritional needs of pregnant or breastfeeding women, persons

engaging in heavy physical labor, children and adults engaging in vigorous physical activity, or those requiring special medical diets (e.g., gluten-free, low-sodium). This means that the amount or types of food in the market baskets likely are insufficient or inappropriate for a significant number of households.

The TFP purchasing power has eroded over time. The purchasing power of the TFP has yet to be increased by USDA, even though the opportunity presented itself when the market baskets were revised in 1983, 1999, and 2006. Each time, prior reviews chose to apply a cost-neutral constraint on the cost of the package overall. As a result, the most recent TFP revision attempted to incorporate new data and reflect new national dietary recommendations, but was revised only within the limits of the same (inflation-adjusted) cost of the previous TFP market baskets from decades earlier. These constrained reviews have compounded the degree to which the TFP package fails to reflect what families need.

Institute of Medicine’s Analysis of SNAP Benefit Adequacy

In 2013, shortly after FRAC released its analysis of the TFP, the prestigious Institute of Medicine (IOM) (now known as the National Academy of Medicine) conducted a thorough study of the adequacy of SNAP benefits.³ Not only did the IOM committee recognize that SNAP benefits are too low, but it also acknowledged flaws in how benefits are calculated, including several related to the TFP. The flaws include, among others, the lag in SNAP benefits keeping up with inflation; households’ shelter costs that consume income that SNAP rules incorrectly treat as available for food purchases (therefore reducing SNAP allotments); and the cost-time trade-offs in obtaining a nutritious diet. Note that many of the issues raised by the IOM committee are consistent with those raised in FRAC’s earlier TFP analysis, and also relate to questions raised by USDA in the “Thrifty Food Plan Stakeholder Listening Sessions.”

In addition, the IOM committee outlined important recommendations to address benefit adequacy issues and improve the TFP, such as

- acknowledging and accounting for the cost-time trade-offs in obtaining a nutritious diet that currently make the SNAP allotment inadequate for most families (e.g., applying a time-adjustment multiplier to the cost of the TFP; adjusting the earned income deduction to reflect time pressures for working participants);
- raising the shelter deduction;
- closing the gap created by the current 16-month time-lag in the TFP cost-of-living adjustment;
- revising the outdated assumption that households have 30 percent of their income to spend on food to reflect the actual current purchasing behaviors of U.S. households;

³ See: Institute of Medicine and National Research Council Committee on Examination of the Adequacy of Food Resources and SNAP Allotments. (2013). *Supplemental Nutrition Assistance Program: Examining the Evidence to Define Benefit Adequacy*. Washington, DC: National Academies Press. Available at: <https://www.nap.edu/catalog/13485/supplemental-nutrition-assistance-program-examining-the-evidence-to-define-benefit>

- adjusting the net income calculation to better reflect the ability of SNAP participants to purchase food (e.g., earned income deduction, cap on the excess shelter deduction, and expansion of the out-of-pocket medical deduction to the nonelderly, nondisabled population); and
- taking into account the impact of limited food access on the ability of program participants to purchase a variety of affordable, healthy foods.

Overall, the IOM report contains many valuable recommendations to improve SNAP benefit adequacy, and FRAC has long supported these adjustments. FRAC urges USDA and policymakers to review and seriously consider the IOM recommendations, but with one word of caution.

The IOM committee recommended that USDA examine the possibility of addressing the impact of food price variation in different regions of the country by making food price adjustments in the maximum benefits for both high and low cost areas. FRAC is concerned that such an adjustment would create a more complicated program that might harm participation and political support, and be subject to Congressional choices of “winners” and “losers” in a difficult process. A better solution is to adjust the SNAP allotment to a more adequate level for all participants and make deductions (e.g., shelter) adequate to reflect key variables of living costs.

Additional Considerations

FRAC has carefully reviewed the questions from USDA’s “Thrifty Food Plan Stakeholder Listening Sessions.” Most questions already have been addressed in this comment letter, the full FRAC TFP report (Appendix A), and/or FRAC’s benefit adequacy paper (Footnote 1). However, FRAC does want to provide further comment on several of the USDA questions (in bold italics in the order in which they appear in the USDA document).

- ***“What monetary and non-monetary factors (e.g., variety, practicality, food preparation, level of convenience, food waste) should be considered in calculating the TFP, and how?”*** While monetary and non-monetary factors were already discussed, FRAC wants to provide specific recommendations on some of these factors. Time is perhaps the most important factor to consider in the USDA review of the TFP as it is a common barrier cited in research and the lived experiences of SNAP participants. Convenience is especially important for working families and single-headed households. One strategy for addressing time and creating a more practical TFP is to include additional convenience items in the market baskets (e.g., bagged salad, frozen fruit) and to increase the overall quantities of convenience items in the market baskets (e.g., increase the amount of “frozen or refrigerated entrees”).

In addition, while each major food category in the TFP can benefit from more variety, this is especially true for the fruit and vegetable categories. Fruits and vegetables have considerable variation in price, quality, and convenience

depending on the season and form, which should be considered by USDA to improve the variety in and practicality of the TFP for SNAP households. Finally, the current food waste factor is unrealistic and outdated. More research is needed on current food waste patterns for low-income households, but until then, the TFP food waste factor of 5 percent should be increased to at least the 10 percent figure used for the USDA's Low-Cost Food Plan.

- **“Given racial inequities and health disparities, how can cultural diversity and needs of Black/Indigenous/people of color communities be addressed in the TFP calculation?”** USDA should disaggregate dietary data by race-ethnicity to better understand the current food consumption patterns of people of color who participate in SNAP. USDA also should identify the most common special dietary needs of people of color (e.g., lactose-intolerance) and their cost implications (e.g., does lactose-free milk cost more per fluid ounce than regular milk?). These findings should then be integrated into the TFP calculation so that the final market baskets account for culturally relevant and appropriate foods. In addition, USDA should translate the TFP market baskets into culturally-relevant and practical shopping lists, menus, and recipes. This can be achieved by updating existing USDA consumer resources, or through the creation of new materials.
- **“Is there additional research or data that USDA should consider in calculating the TFP? Please provide.”** As already discussed, the TFP does not account for special dietary needs, such as food allergies, lactose-intolerance, medical diets, or the additional nutritional needs of specific populations (e.g., pregnant or breastfeeding women). While there is limited research focused on this TFP weakness, a recent study did find that the TFP falls short of meeting the needs of women following a special diet for lactose intolerance, diabetes, or pregnancy.⁴ All three diet plans exceeded the cost of the TFP, leading the researchers to conclude that the TFP “provides an unrealistic assessment of need among 20 to 50-year-old females with relatively common dietary needs.” This study might be useful to USDA as it considers how to take special dietary needs into consideration in the TFP calculation.

In addition, a number of studies relevant to the TFP review have been published since the 2006 TFP revision, many of which are cited in FRAC's analysis. Although not a comprehensive bibliography, FRAC recommends that USDA review the following studies published since the FRAC report:

- Davis, G. C. (2021). The American Rescue Plan Act is a great start but more increases in Supplemental Nutrition Assistance Program (SNAP) benefits are likely needed due to implicit hidden reductions. *Journal of*

⁴ See: Babb, A. M., Wasserman, J. K., Knudsen, D. C., & Lalevich, S. T. (2019). An examination of medically necessary diets within the framework of the Thrifty Food Plan. *Ecology of Food and Nutrition*, 58(3), 236-246. Available at: <https://www.tandfonline.com/doi/full/10.1080/03670244.2019.1598978>

Nutrition, published online ahead of print. Available at:

<https://academic.oup.com/jn/advance-article/doi/10.1093/jn/nxab125/6283783>

- Gundersen, C., Kreider, B., & Pepper, J. V. (2019). Reconstructing the Supplemental Nutrition Assistance Program to more effectively alleviate food insecurity in the United States. *RSF: The Russell Sage Foundation Journal of the Social Sciences*, 4(2), 113-130. Available at: <https://www.jstor.org/stable/10.7758/rsf.2018.4.2.06>
- Gundersen, C., Waxman, E., & Crumbaugh, A. (2019). An examination of the adequacy of the Supplemental Nutrition Assistance Program (SNAP) benefit levels: impacts on food insecurity. *Agricultural and Resource Economics Review*, 48(3), 433-447. Available at: <https://www.cambridge.org/core/journals/agricultural-and-resource-economics-review/article/an-examination-of-the-adequacy-of-supplemental-nutrition-assistance-program-snap-benefit-levels-impacts-on-food-insecurity/59160A1F2A28CFA2DB686516C144B388>
- Jetter, K. M., Adkins, J., Cortez, S., Hopper, G. K., Shively, V., & Styne, D. M. (2019). Yes we can: eating healthy on a limited budget. *Journal of Nutrition Education and Behavior*, 51, 268-276. Available at: [https://www.jneb.org/article/S1499-4046\(18\)30906-0/fulltext](https://www.jneb.org/article/S1499-4046(18)30906-0/fulltext)
- Waxman, E., Gundersen, E., & Thompson, M. (2018). *How Far Do SNAP Benefits Fall Short of Covering the Cost of a Meal?* Washington, DC: Urban Institute. Available at: https://www.urban.org/sites/default/files/publication/96661/how_far_do_snap_benefits_fall_short_of_covering_the_cost_of_a_meal_2.pdf
- You, W., & Davis, G.C. (2019). Estimating dual headed time in food production with implications for SNAP benefit adequacy. *Review of Economics of the Household*, 17, 249–266. Available at: <https://link.springer.com/article/10.1007/s11150-018-9403-7>
- Ziliak, J. (2016). *Modernizing SNAP Benefits*. Washington, DC: The Hamilton Project. Available at: https://www.hamiltonproject.org/assets/files/ziliak_modernizing_snap_benefits.pdf
- **“Many SNAP participants do not get the maximum benefit allotment of benefits because of other aspects of SNAP law and policy related to their household income and expenses. Should any of those be changed?”** While USDA’s current charge is to reevaluate the TFP “to better reflect the modern cost of a healthy basic diet,” it is worth reiterating that the impractical and flawed TFP is only one reason why SNAP benefits are inadequate. The Administration and Congress should pursue additional solutions to further address SNAP benefit inadequacy. These include
 - addressing the aforementioned time-lag in TFP pricing (which affects the maximum benefit level and, thereby, all participants’ benefits);
 - removing the cap on the excess shelter deduction; and

- improving the excess medical deduction, including making the Standard Medical Deduction more available.⁵
- **“Is there additional research or data that USDA should consider related to SNAP households? Please provide.”** FRAC is pleased that USDA has solicited and received feedback from people with lived experience during this review process. To compliment those efforts, USDA should review the rich qualitative research literature examining the successes and challenges that low-income households experience when making food choices and purchases. FRAC specifically recommends the following studies:
 - Chiappone, A., Parks, C. A., Calloway, E., Fricke, H. E., Stern, K. & Yaroch, A. L. (2018). Perceptions and experiences with SNAP and potential policies: viewpoint from SNAP participants. *Journal of Hunger and Environmental Nutrition*, 14(1-2), 98-109. Available at: <https://www.tandfonline.com/doi/full/10.1080/19320248.2018.1512927>
 - Edin, K., Boyd, M., Mabli, J., Ohls, J., Worthington, J., Greene, S., Redel, N., & Sridharan, S. (2013). *SNAP Food Security In-Depth Interview Study*. Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service, Office of Research and Analysis. Available at: <https://www.fns.usda.gov/snap/food-security-depth-interview-study>
 - Kinsey, E. W., Oberle, M., Dupuis, R., Cannuscio, C. C., & Hillier, A. (2019). Food and financial coping strategies during the monthly Supplemental Nutrition Assistance Program cycle. *SSM Population Health*, 7, 100393. Available at: <https://www.sciencedirect.com/science/article/pii/S2352827319300114>
 - Seefeldt, K. S., & Castelli, T. (2009). Low-income women’s experiences with food programs, food spending, and food-related hardships: evidence from qualitative data. *Contractor and Cooperator Report*, 57. Washington, DC: U.S. Department of Agriculture, Economic Research Service. Available at: <https://naldc.nal.usda.gov/download/35894/PDF>

In closing, FRAC fully supports USDA’s efforts to revise the outdated and impractical TFP so that it better meets the needs and realities of SNAP beneficiaries as they obtain an adequate, nutritious, and palatable diet. FRAC’s own analysis of the TFP and the aforementioned IOM report serve as important resources for this work. Moving forward, and as mandated in the 2018 Farm Bill, USDA should revise the TFP every 5 years to account for the latest dietary guidance, food prices, food composition data, and consumption patterns.

FRAC appreciates this opportunity to share our comments and looks forward to further engaging with USDA to strengthen SNAP.

⁵ See FRAC’s transition recommendations in: Food Research & Action Center. (2020). *This is the Time Heal in America and it Begins with Addressing Hunger*. Washington, DC: Food Research & Action Center. Available at: <https://frac.org/wp-content/uploads/FRAC-Transition-Recommendations-to-Address-Hunger-in-US-2020.pdf>

Sincerely,

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