



August 13, 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 respond to USDA's request for information: "Identifying Barriers in USDA Programs and Services; Advancing Racial Justice and Equity and Support for Underserved Communities at USDA." FRAC commends USDA's efforts to ensure agency policies equitably serve all eligible communities and fully supports the formation of a Racial Equity Commission.

FRAC applauds USDA's quick actions during the pandemic to increase benefits, increase flexibility, and facilitate innovation in the federal food programs. Without these actions, millions more families would not have had enough to eat; however, hunger rates remain far too high, and disparities exacerbated during the pandemic have persisted. Families of color have been disproportionately impacted. Improvements to the federal nutrition programs must be guided by data and principles of equity so historically and currently marginalized groups are not left behind as the nation recovers from the pandemic.

FRAC has a long history of advocating for the federal nutrition programs, including the Supplemental Nutrition Assistance Program, National School Lunch Program, School Breakfast Program, Afterschool Nutrition Programs, Summer Nutrition Programs, Special Supplemental Nutrition Program for Women, Infants, and Children, and Child and Adult Care Food Program. FRAC's advocacy work would not be possible were it not for strong partnerships with a diverse network of thousands of state and community organizations from across the country that are allied with us in the pursuit of greater justice for the vulnerable and disenfranchised. This comment letter draws from our work and partnerships. Responses focus on General Questions 4, 5, 6, 7, 9, 10, and 12.

Sincerely,

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FRAC's recommendations focus on methods and policy changes within existing rules and current leading practices. Recommendations include strategies to promote equity among all underserved groups as well as those that specifically impact the well-being of Native Americans and immigrant communities.

FRAC also respectfully submits a list of recommended program improvements to increase equity, including policy and legislative proposals in two documents attached to these comments, [*"This is the Time to Heal in America,"*](#) and [*It Begins with Addressing Hunger*](#) and [*Child Nutrition Reauthorization: Priorities to Improve and Strengthen Child Nutrition Programs*](#). While not within the bounds of this request for information regarding USDA "policies, regulations and guidance," it is worth noting that FRAC's legislative recommendations would greatly enhance equity in the programs. FRAC calls on Congress to strengthen SNAP and the Child Nutrition Programs, including Healthy School Meals for All, Summer P-EBT, an additional meal for children in full-day child care, and extending WIC certifications and fruit and vegetable benefit increases.

4. Are there USDA policies, practices, or programs that perpetuate systemic barriers to opportunities and benefits for people of color or other underserved groups? How can those programs be modified, expanded, or made less complicated or streamlined, to deliver resources and benefits more equitably?

4.A. Invest in program administration and streamline the application process to increase access. Negative experiences during enrollment or program use can dissuade eligible individuals and families from participating in programs. Long wait times, burdensome paperwork, and lack of transportation have been consistently cited as top barriers among participants and outreach workers.^{1,2} Barriers that exacerbate lost work time and wages are especially burdensome for communities of color. Systemic injustices, like discrimination in hiring and job segregation, have led to disproportionate representation in low-wage jobs that require in-person work and have fewer flexibilities and time off,³ as well as higher rates of unemployment, which increases the urgency of maintaining a job.⁴ COVID-19 has exacerbated these disparities.⁵ In addition, lack of control over one's time and program resources leads to disempowerment. In one study with predominantly Black women,⁶ participants perceived that programs were quick to sanction and punish while reinstating benefits was a bureaucratic and lengthy process.

Recommendations for streamlining administrative systems are focused on the following three strategies: improve customer service; simplify applications and enrollment; and expand options for streamlining automatic eligibility for the federal nutrition programs (e.g., school meals) based on eligibility in other public assistance programs.

(1) Improve customer service. Supporting and, when necessary, improving customer service are essential to equitable program access and participation.

Actions

- Partner with community groups to gain feedback on customer service issues that could help inform equity assessments and civil rights compliance reviews. Conduct telephone, virtual, or in-person visits to local SNAP offices or WIC clinics to observe and assess customer service. For example, the DC Office of Human Rights regularly assesses the accessibility of programs to persons with limited English proficiency.⁷
- Provide adequate funding for local agency offices to hire enough staff and provide training. When agencies are under-funded, they become understaffed, thus decreasing available assistance and increasing wait times for participants.
- Establish staff accountability for customer service (e.g., performance reviews and client feedback), provide training and skills development, and empower local staff to offer recommendations for system improvements.
- Collaborate with state administrators to test notices, messages, and technology tools with participants and community-serving agencies prior to implementation.

(2) Simplify applications and enrollment. In partnership with The Food Trust and local anti-hunger organizations, FRAC has convened several task forces across the country to assess barriers and solutions to enrolling participants in SNAP.^{8,9,10,11} FRAC's WIC recommendations are based on a multi-year investigation of the barriers to WIC participation and benefits, and effective strategies for maximizing WIC participation and the use of benefits. FRAC conducted a comprehensive background research and literature review; an in-depth analysis of WIC participation, WIC coverage, and related factors; and discussions with national, state, and local stakeholders.¹² There is broad consensus that simplifying the application process and integrating online and telephone services increase enrollment.

Actions

- State and local SNAP, WIC and child nutrition agencies should be allowed to offer a full range of application options, including online, by phone, and in person.
- Offer easy-to-use, appealing, and informative websites and apps with clear, brief, and easy-to-read material in multiple languages. Include digital options for appointment scheduling, pre-screening tools, applications, and submitting documentation.

(3) Expand options for streamlining automatic eligibility for the federal nutrition programs that are based on eligibility in other public assistance programs. Expanding streamlined eligibility for school meals, WIC, and other child nutrition programs to more families will encourage more people to apply, reduce red tape, and free up school, child care, and WIC resources. Using automatic income eligibility mechanisms, such as direct certification, community eligibility, and adjunctive eligibility, makes eligibility determinations more reliable and closely connects the nutrition and health programs that marginalized and underserved families need.

Actions

- Enhance school meal direct certification options. All school districts should be allowed to use income data from Medicaid to identify students for free and reduced-price school meals without a separate application. USDA should build upon the success of the Medicaid pilot for direct certification by piloting additional programs and intersections that allow for direct certification.
- Expand the use of the Community Eligibility Provision (CEP) to overcome the barriers to school meals applications, and instead, offer free school meals to all, ensuring all children have access to the breakfast and lunch they need to learn and thrive. USDA should partner with the U.S. Department of Education (DOE) to overcome any perceived barriers tied to education funding and the loss of data related to a student's free or reduced-price status. USDA and DOE should also work together on outreach to implement CEP in schools with limited resources, which too often include schools that serve communities of color.
- Allow all states to use direct certification for CACFP by using SNAP and other program participation data to establish eligibility for free and reduced-price school meals. (Head Start participation confers automatic eligibility for CACFP.)
- Streamline WIC enrollment and certification by ensuring that all staff providing services remotely or in local clinics can establish adjunctive eligibility for applicants via online access to state Medicaid, SNAP, and other relevant public assistance program data.¹³ Participants in SNAP, Medicaid and some other public assistance programs are automatically “adjunctively” income-eligible for WIC. Incompatible state computer systems or State agency reluctance to provide access to data are common barriers for WIC State agencies and clinics. USDA should mandate state SNAP agencies share data and work to establish system interoperability, and they should negotiate with the Department of Health and Human Services to offer the same for Medicaid and other programs.
- *For additional details please see responses to question 6 and 9.*

4.B. Ensure that participants have physical access to program resources.

The ability to access resources is an important factor in measuring the equitable impact of programs. Whether a participant can access resources impacts their cost-benefit decision when enrolling.

- ***Evaluate geographic access and ensure that SNAP offices, WIC clinic locations, and school and summer meal sites allow access to all participants.*** WIC clinics, SNAP offices, summer meal sites, and schools that have adopted community eligibility should be strategically located to extend the programs' reach to vulnerable populations. Mapping software can be used to compare these program sites to having access to transportation, to the locations of other social services, and to demographic information, including income, race and ethnicity, language spoken at home, infant and maternal mortality, and overweight and obesity rates.

For example, co-locating WIC clinics with maternal and child health services offered in clinics and hospitals allows coordination of appointments and reduces the number of separate trips. An effective example in Maryland and D.C. is Mary's Center,¹⁴ a

community health center with a WIC program, which operates a community outreach van, also known as the Mama and Baby Bus. The WIC program relies on the trained Mama and Baby Bus staff to do WIC outreach on an ongoing basis.

- ***The federal government should work with state and local governments and other stakeholders to ensure sufficient SNAP and WIC retailer options for all participants.*** A successful WIC or SNAP shopping experience is central to program participant satisfaction, continued participation, and maximizing benefits. The shopping experience can be intimidating, confusing, and result in people opting out of the program or not using their benefits. Distance to authorized retailers can limit access to participation or full use of benefits. For WIC specifically, lifting unnecessary state WIC agency moratoriums on new vendors gives stores the opportunity to apply to become authorized to redeem WIC benefits. States should employ appropriate and reasonable “vendor selection” requirements to qualify stores in underserved areas and offer a clear, timely, and practical authorization process for stores. Small vendors in underserved areas should be provided strong vendor training and technical assistance for store staff in order to ensure both commercial viability and that minimum stocking requirements and quality are maintained.

4.C. Reduce the stigma of participating in the federal food programs.

Stigma is a key driver of inequities¹⁵ and operates at individual and structural levels.^{16,17} First, stigma affects the behaviors and well-being of groups being targeted. Anticipation of stigma may cause individuals to engage in behaviors to conceal stigmatized characteristics, like adults refusing to enroll in federal programs or youth refusing free school meals. Second, stigma between individuals manifests as prejudice (e.g., discomfort with or dislike of people in poverty), stereotypes (e.g., people in poverty are lazy and take advantage of the welfare system), and discrimination (e.g., unfair or unjust treatment of individuals, such as the failure to offer healthy foods due to the belief that people with low income dislike fresh fruits and vegetables). These interactions may be a result of explicit and implicit biases.

Importantly, people may live with a range of overlapping stigmatized identities, including race, gender, and poverty, which means that stigma disproportionately impacts racial minority groups. Black adults report higher levels of interpersonal stigma for participating in welfare programs (e.g., from family, friends, service providers, program administrators) than White adults, particularly Black adults who live in communities with few racial groups represented.¹⁸

Stigma has been shown to reduce enrollment and participation in federal nutrition programs.^{19,20} For example, in WIC, shoppers often encounter stigma when purchasing food due to confusion over eligible items in the WIC food package, discrimination, or both,²¹ resulting in reduced benefit redemption or program dropout.²² This confusion is compounded for participants with limited English proficiency. As another example, school-age children may experience shame for relying on free or reduced-price meals or for having unpaid school meal debt, leading them to forgo breakfast or lunch.^{23,24,25}

Several strategies have been shown to reduce stigma in the federal nutrition programs. Providing electronic benefit transfer (EBT) cards has reduced stigma for participants in SNAP and WIC, which has increased enrollment.²⁶ Having time for all students to participate in school breakfast after the bell has increased participation in free and reduced-price breakfast.²⁷ School breakfast and community eligibility are successful strategies that are discussed further in response to General Question #6.

Actions

- SNAP should preserve the dignity and choice of beneficiaries. One of SNAP's core strengths is that it runs on the regular rails of commerce: via authorized retail food outlets and EBT processing. These promote cost effective operations, obviating the need for the government to set up and pay for its own food distribution system. Moreover, they allow SNAP participants to shop and purchase food in a manner similar to other customers. In contrast, proposals to limit SNAP participants' food choices or to add photo identification to EBT cards undermine the mainstream nature of the SNAP transaction and entail unwarranted complexity and costs. Food choice is particularly important for people to obtain foods that are culturally appropriate.
- For WIC, participants should receive adequate training and easy-to-use options to determine if a food is WIC-eligible.
- Encourage school districts to implement breakfast after the bell programs to support greater access to school breakfast. USDA could provide technical assistance and conduct a school breakfast campaign that engages the U.S. Department of Education as well as anti-hunger and education stakeholders.
- Reduce obstructive bureaucracy (long wait times, complex application processes, etc.) and eliminate punitive processes, which cause federal programs to be perceived as deliberately penalizing.²⁸
- Address implicit biases and discrimination among program staff. Recommended strategies include providing anti-racist and cultural competency training, particularly those that provide information to refute common stereotypes.
- Cultivate organizational cultures of equity, diversity, and inclusion. Use environmental cues, such as photographs and art, to communicate respect and inclusivity towards members of stigmatized groups.
- Increase diversity of program staff and hire with language access/cultural competency in mind. Staff working with program participants should be representative of the population they are serving.
- Support service providers who are from the community. For example, immigrant families often cite family child care as the best choice for receiving culturally relevant care.²⁹
- For individuals confronted with stigma for participating in federal nutrition programs, incorporate stigma-reducing tools (affirmation interventions, social support) within existing interventions, such as nutrition education programs.³⁰
- Engage in public campaigns to reduce stigma and track shifts in public opinion.^{31,32} Encouraging stigmatized people to share their stories, particularly influential leaders who may have had to access program benefits at some point in their lives, is one strategy that can be incorporated into a campaign.

4.D. Eliminate arbitrary barriers to SNAP eligibility and improve other benefit computation rules. FRAC recommends that eligibility for SNAP should be expanded at the federal level, including eliminating time limits for certain unemployed and underemployed people who are unable to document sufficient weekly work hours, bans for former drug felons, and the five-year bar that disqualifies many adults with legal permanent resident status. In addition, college students who meet income criteria should be allowed to participate and USDA should simplify eligibility for students and increase outreach to colleges and universities.³³ Food insecurity is higher among college students who are people of color, yet few students apply due to lack of awareness or complexity of applying.³⁴

Expanding federal income and asset eligibility would also help households located in areas with higher costs of living and working families with significant out-of-pocket expenses for child care and shelter. Raising asset limits under broad-based categorical eligibility in SNAP has been associated with an increase in assets.^{35,36} Since people of color have historically faced barriers to accumulating wealth, stricter asset limits perpetuate systemic barriers to accumulating savings and wealth.³⁷

4.E. Increase SNAP benefit adequacy. Benefits for most households are not enough to get through the entire month without hunger or being forced to sacrifice nutrition quality. Reasons include 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); the cost-time tradeoffs in maintaining a nutritious diet; and the inadequacy of the current Thrifty Food Plan market basket.^{38,39}

These factors disproportionately affect people of color. Due to systemic injustices in housing practices, Black and Latinx renters and homeowners are more likely to be cost-burdened.⁴⁰ Due to discrimination in hiring and job segregation, people of color are disproportionately represented in low-wage jobs that require in-person work and have fewer flexibilities and time off.⁴¹ Therefore, inadequate benefits perpetuate disparities in financial stability and food security.⁴²

FRAC has long called for replacing the Thrifty Food Plan with the Low-Cost Food Plan.⁴³ The latter plan is generally in line with what low- and moderate-income families report they need to spend on food, as opposed to the lower amount provided by the Thrifty Food Plan. The Low-Cost Food Plan also allows for greater food variety and choices to support a healthful, palatable diet. In addition, there are multiple policy solutions from advocates and researchers on how to improve benefit adequacy.⁴⁴ For further detail on the Thrifty Food Plan, see the attached comment that FRAC submitted to Secretary Vilsack regarding the evaluation of the Thrifty Food Plan.

4.F. Child nutrition program agencies should streamline program participation requirements and target outreach to recruit providers for CACFP in underserved communities. Thousands of child care programs across the nation do not participate in CACFP due to systemic barriers. Many child care programs do not participate in CACFP because the benefits are inadequate, the program is wrought with burdensome paperwork, and the losses and penalties are too detrimental

to child care providers that operate on razor-thin margins. These barriers disproportionately impact communities of color, providers, and parents with few resources, contributing to gross inequities in child care quality and nutrition. FRAC recommends reducing unnecessary paperwork, including increasing the use of direct certification, revising the serious deficiency auditing process, increasing benefits, and making the area eligibility waiver permanent.

When appropriate, CACFP can extend eligibility to license-exempt family child care homes that meet federal, state, or local approval standards. Many of these homes serve children from low-income families and receive child care subsidy funds. Many low-wage working families use license-exempt family child care because of the flexibility that it provides households with demanding work schedules. Immigrant families often cite family child care as the best choice for receiving culturally relevant care.

4.G. Create a more comprehensive and timely system of collecting and fully utilizing race and ethnicity data in the federal nutrition programs.

The reliable and timely collection of race and ethnicity data across programs is essential to deliver resources equitably. However, collecting missing race and ethnicity data can be a sensitive issue. Filling in missing race and ethnicity data by visually identifying a person's race or ethnicity is a civil rights issue because of the risk for misclassification. Racial misclassification can disproportionately impact racial and ethnic minority groups. Recently, USDA took the important step of eliminating the process of program operators visually identifying children's race, ethnicity, or both as a back-up measure when forms were not completed. This creates an opportunity to improve the system for collecting this information. FRAC commends USDA for eliminating the use of visual identification to determine race and ethnicity.

To inform equitable policy strategies in the federal nutrition programs, several shortfalls need to be addressed. The new, more comprehensive system should produce reliable data in a timely manner that can be used to evaluate coverage rates, site locations, service discrimination, and other civil rights and equity issues. USDA should be given the funding and authority to create this system.

4.H. Monitoring food insecurity: Improve data collection and sampling structures to collect more detailed nationally representative data by race and ethnicity, including a nationally representative sample of Native American households.

There is no current comprehensive annual measure of food security for smaller marginalized populations, e.g. American Indian, Native Alaskan, Native Hawaiian and Pacific Islander. Due to small sample sizes, these populations are often reported in aggregate as an "other" category. Absence of data for these communities is common across federal agencies and policy makers and administrators often fail to secure meaningful data. Policies that leave these populations out of data collection efforts, data reporting, and analysis further exacerbate inequities.

Lack of data is part of the greater issue of erasure and invisibility which has existed for decades. The COVID-19 pandemic provided the most recent glimpse of this situation (e.g., lack of data on hunger or COVID-19 mortality in Native communities). FRAC

recommends an expanded mandate and an increase in funding for research on food insecurity and sovereignty among American Indian, Native Alaskan, Native Hawaiian, and Pacific Islander communities.

Actions

- Support researchers from Native-led organizations.
- Increase the funding and mandate for the USDA Economic Research Service to field annual and periodic surveys that include sampling frames sufficient to generate nationally representative estimates of these groups.
- Commission an interagency task force to address these issues of data collection and availability.

4.I. In immigrant communities, ensure that families and individuals, regardless of immigration status, have access to programs. Some immigrant families face unique barriers to federal programs due to language barriers, discrimination, fear of deportation, and misinformation about eligibility.

A report released by FRAC in partnership with the National Immigration Law Center found that the 2019 Department of Homeland Security (DHS) public charge rule had a chilling effect on program enrollment in nutrition programs among Latino families.⁴⁵ This included SNAP, a program directly covered by the public charge rule, as well as programs not covered, like WIC, school meals, and Pandemic EBT. For example, more than one-quarter of the immigrant parents who were surveyed reported that they stopped using SNAP or other food programs in the last two years due to immigration-related concerns, which was echoed by nutrition service providers. Concerns stemmed from an unclear understanding of whether applying for any of the federal nutrition programs would count against them under the 2019 rule, which they did not.⁴⁶

FRAC's findings are confirmed by other research linking uncertainty about the public charge law to reduced enrollment in nutrition assistance programs⁴⁷ and reduced enrollment of children in Medicaid before the rule even went into effect.⁴⁸

Actions

- USDA can require state agencies, governments, and local school districts to issue clear, affirmative messaging on immigrant family access to programs. Succinct messaging on how eligible immigrant families can safely access programs without fear of public charge consequences can help combat misinformation. Examples of state SNAP agencies that have publicized how the public charge rule does not apply to SNAP include California;⁴⁹ Massachusetts;⁵⁰ and New York City.⁵¹
- Create and distribute materials, in multiple languages, to ensure all families are able to access the programs, especially if there is an application.
- Build relationships with immigrant communities and immigrant-serving organizations.⁵² This ensures that families hear about programs in accurate and easy-to-understand terms that are culturally appropriate, in a language they are familiar with, and from those they trust. Partner with trusted organizations to craft and disseminate information about services and program enrollment.
- Implement, publicize, and monitor policies that help immigrants feel safer when seeking federal assistance.

4.I. In Native communities, center Native leadership and Native people’s needs in program enrollment and delivery. The collective historical and current traumas endured by Native Americans have led many to distrust U.S. government programs and interventions. Federal programs must consider the legacy in the design and delivery of programs.

One central issue is granting Tribes, as sovereign governments, the authority to directly administer the child nutrition programs, including school meals, out-of-school time meals, and CACFP. Tribes already have the option to run WIC. This is critically important for recognizing Tribal sovereignty and would ease the administrative burden on tribes, like the Navajo Nation, that straddle multiple states and must coordinate with multiple state agencies to provide school meals.

Another key priority is to support food sovereignty on Tribal lands by using food produced by Native farmers in the child nutrition programs. The current child nutrition food procurement and WIC vendor rules create significant barriers, favoring large producers and excluding Tribal producers. FRAC recommends creating easier pathways for Native farm products to be included in the school meal and out-of-school time meal programs and the Tribal child care programs (including Head Start), and to be allowed as WIC vendors redeeming the WIC fruits and vegetables vouchers.

FRAC also recommends allowing Tribal organizations to enter self-determination contracts to procure foods for Food Distribution Program on Indian Reservations (FDPIR) packages and to allow participants to use benefits from FDPIR and SNAP at the same time.

5. How can USDA establish and maintain connections to a wider and more diverse set of stakeholders representing underserved communities?

5.A. Partner on outreach with national and community organizations that represent all constituencies, especially those that are marginalized.

Programs must include culturally responsive and linguistically appropriate outreach, education, and enrollment to ensure that programs reach all eligible children and families and meet the diverse needs of communities. Outreach, coordination, and connections in a shared language and culture are meaningful, compelling, and necessary: in 2017, almost 26 million people reported being limited English proficient (LEP), including 60 percent who speak Spanish.⁵³ Effective outreach by community partners could broaden program reach and help overcome barriers to participation, including widespread misconceptions about eligibility, concerns expressed by immigrant families, and limited access to information about benefits, including how to apply.

Agencies should support state and local program offices with appropriate funding to support outreach efforts and provide guidance on prioritizing marginalized racial, ethnic, and other populations. For example, USDA recently released guidance for State

Outreach Plans for SNAP, which identifies four priority areas for outreach: racial equity, students, immigrant communities and mixed-status families, and veterans.⁵⁴ Federal matching funds reimburse state agencies for SNAP outreach, including for contracting with community partners. Funding community-based trusted messengers and leaders to connect people and communities to programs is particularly important for immigrant, Tribal, and other underserved communities with lower access to resources and often underfunded community-based organizations. Earlier in this century the Bush administration implemented 100 percent federally funded competitive grants to support innovative SNAP outreach that were launched by the Clinton administration. As FRAC and UnidosUS leaders have written to USDA, the federal government should again dedicate resources for such efforts.⁵⁵

An example of a successful partnership between a national and community-based organization reaching underserved communities is the collaboration between UnidosUS and the Latino Community Development Agency (LCDA) in Oklahoma. Using *Comprando Rico y Sano*, a program developed by UnidosUS that centers *promotores de salud* (community health workers), LCDA has become the primary agency responsible for assisting Latinos with SNAP enrollment in Oklahoma City. A UnidosUS report on community-driven strategies to reduce food insecurity includes details of LCDA's culturally responsive implementation strategy.⁵⁶

Actions

- Provide adequate federal funds for state agencies to partner with community organizations to conduct outreach and enrollment to immigrant, Tribal, rural, and other marginalized communities.
- Employ social media, web-based advertisements, and websites as updated marketing tools. Prioritize easy-to-use, inclusive materials in multiple languages.
- Engage the power of positive word-of-mouth recommendations.
- Give providers, like SNAP- and WIC-authorized food retailers, a role in outreach.

5.B. Invest in community coalitions. Local task forces or coalitions bring together stakeholders from a variety of organizations to strengthen social services. Coalitions can include nonprofits, state agencies, faith-based organizations, emergency food providers, community health centers, and more. These stakeholders should serve all populations, especially those that are marginalized, and regularly seek client feedback. Coalitions also provide opportunities for sharing information, training, and coordinating of services.

Coalitions lead to policy changes that promote equity. For example, FRAC's Maryland Hunger Solutions (MDHS) participates in a Governmental Access Workgroup, which facilitates the sharing of information from partners across various sectors. Through this coalition, language access was identified as a barrier to inclusive customer service, particularly during the pandemic with rapidly changing programs (e.g., how to receive school and summer meals). The coalition has focused on helping member organizations hire bilingual staff, incentivize bilingual applicants to apply, and provide training on how to use translation services. MDHS has engaged with the Maryland SNAP agency to review their language access policy and provide recommendations for improvement. Other examples of community coalitions include the [Community Quality Councils](#),

established in 2004 by the Illinois Hunger Coalition and the Illinois Department of Human Services, and the [Community Partner Program](#), established in 2012 by the Texas Health and Human Services Commission.

Actions

- Fund community coalitions in order to support the expertise of community organizations that are often strapped for resources.
- Coordinate across agencies to create broad coalitions.

5.C. In Native communities, engage Tribal leaders through the consultation process. The Biden administration has recommitted itself to centering Indigenous voices through consultations;⁵⁷ these consultations will center on the needs of Tribal communities.

Actions

- Consultations with Tribal leaders and organizations must be in accordance with [E.O. 13175: Consultation Coordination with Indian Tribal Governments](#); and
- “Dear Tribal Leader” letters and other calls for consultation must be provided to Tribes, at a minimum, 30 days before the consultation is scheduled to take place. These announcements must be widely publicized.

6. Please describe USDA programs or interactions that have worked well for underserved communities. What successful approaches to advancing justice and equity have been undertaken by USDA that you recommend be used as a model for other programs or areas?

6.A. Data sharing to increase enrollment in multiple programs. Direct certification in school meals and adjunctive eligibility in WIC are two examples of data-sharing strategies. Such programs reduce barriers, such as language and literacy, with completing multiple applications. For example, direct certification has been one of the most successful strategies to ensure that eligible children are certified for free or reduced-price school meals.⁵⁸ The piloting of Medicaid direct certification has allowed more eligible children, particularly children who are immigrants and do not participate in SNAP, to be certified for free school meals. USDA can build upon this success by increasing the number of states that are able to pilot Medicaid direct certification and pilot additional programs and intersections that allow for direct certification.

Further details on improving data-sharing systems can be found in section 9.A. and in the attached direct certification letter sent to Secretary Vilsack on May 10, 2021.

6.B. Community Eligibility. The Community Eligibility Provision (CEP) has highlighted the value of offering meals at no charge to all students. It overcomes the barriers to school meal applications, helps eliminate stigma (that participation is for “poor kids”), and ensures that all children have access to the breakfast and lunch they

need to learn and thrive.⁵⁹ Children whose families are struggling, but do not meet the current eligibility threshold to qualify for free school meals, are more likely to participate in school lunch in CEP schools compared to non-CEP schools.⁶⁰

More schools could adopt community eligibility but face real and perceived barriers to participation. USDA should partner with the U.S. Department of Education to overcome perceived barriers (e.g., education funding and the loss of data related to a student's free or reduced-price status) and to increase outreach to schools, particularly those with limited resources, which too often includes schools that serve communities of color.

7. Does USDA currently collect information, use forms, or require documentation that impede access to USDA programs or are not effective to achieve program objectives? If so, what are they and how can USDA revise them to reduce confusion or frustration, and increase equity in access to USDA programs?

7.A. School meals applications can act as a barrier to participation.

Language, literacy barriers, and some of the required questions can limit participation. One strategy to support better and broader outreach is to allow state child nutrition agencies to assist with the application process by using a statewide application that any family in the state can complete. This would make it easier for grassroots and faith- and community-based organizations, and other trusted messengers, to assist families in submitting school meal applications. A statewide application also would help ensure that families have access to a school meals application in the appropriate language.

7.B. The paperwork required in order to operate more than one child nutrition program can impede participation. For example, schools and Summer Food Service Program sponsors are hesitant to provide afterschool meals through CACFP. Previously, USDA has provided opportunities for states to streamline some program requirements, but many states have not implemented these options. Additional technical assistance and encouragement would be incredibly helpful. In addition, Section 9(i) of the Richard B. Russell National School Lunch Act (42 U.S.C. 1758(i))⁶¹ requires states to use a single agreement and common claims form (if the state agency houses multiple child nutrition programs). Most states have moved on the single agreement, but more could be done to ensure that states are using a common claims form and to use that flexibility to further ease the operating of multiple programs.

9. Are there data-sharing activities in which USDA agencies should engage, so that repetitive collections of the same data do not occur from one USDA component to the next?

9.A. Increase coordination between the federal nutrition programs and other social safety net programs regarding applications, outreach, and enrollment assistance. Many means-tested programs have significant overlap in eligibility criteria. Despite this, individuals and families enrolled in one program might not be enrolled in another due to burdensome paperwork, lack of awareness, and misinformation. Coordination across programs is critical because individuals often face multiple material insecurities, including income, food, housing, and healthcare.⁶² The history of U.S. slavery, segregation, migration, and social policies has resulted in disproportionately high rates of overlapping insecurities among communities of color.⁶³ For example, most adults and children who qualify for Medicaid, based on income eligibility, also will qualify for SNAP and WIC; however, in 2018, less than half (47 percent) of Medicaid enrollees also participated in SNAP and 54 percent of children under 5 years old who were enrolled in Medicaid also were enrolled in WIC.⁶⁴

Actions

- State agencies should streamline data matching and automatic eligibility.
 - Direct certification: School districts can use income data from Medicaid to identify students for free and reduced-price meals without a separate application. (see response 6.A.)
 - Allow all states to use direct certification for CACFP, using SNAP and other program participation data to establish eligibility for free and reduced-price meals.
 - SNAP, Medicaid, and Temporary Assistance for Needy Families (TANF) provide adjunctive income eligibility for WIC. A recent research brief describes how data sharing and matching with SNAP and Medicaid can be used to increase enrollment in WIC and includes key considerations for executing a data-sharing agreement across programs and agencies.⁶⁵
- Expand access to SNAP through Broad-Based Categorical Eligibility and raising gross income limits. Because other safety net programs use SNAP enrollment, this would increase awareness of and enrollment in other programs.⁶⁶
- Provide adequate funding. Increased collaboration between agencies will require investments in information systems and technical assistance.
- In addition to enrolling participants, collaboration across agencies should be leveraged to enroll providers. For example, child care licensing and subsidy agencies can be recruited to help raise awareness of CACFP, while the U.S. Department of Education can help eligible school districts qualify for the Community Eligibility Provision to offer free school meals to all students.
- Streamline the application process for multiple benefits. Examples include ONE Oregon;⁶⁷ Los Angeles County's YourBenefitsNow! Webpage;⁶⁸ and Your Texas Benefits.⁶⁹

10. How can USDA use technology to improve customer service? Do you have suggestions on how technology or online services can help streamline and reduce regulatory or policy requirements? What are those technological programs or processes and how can USDA use them to achieve equity for all?

10.A. Provide more flexibility in enrollment and recertification. Requiring in-person interviews disproportionately affects individuals and families with fewer resources, including time and access to transportation. Examples of external barriers include less flexible job hours, caretaking responsibilities, and the fear, among immigrant families, of being out in public.

COVID-19 has provided the opportunity to assess the effects of federal waivers that increase flexibility in enrollment and recertification. For example, the WIC program allowed participants to receive benefits remotely and complete enrollment and appointments from a convenient location over the phone. SNAP extended certification periods, waived period reporting requirements due to income changes between recertifications, eliminated telephone and in-person interviews, and allowed telephonic signatures on applications. These waivers have helped increase participation and ease benefit redemption.^{70,71}

FRAC recommends making permanent federal flexibilities during COVID-19 that have reduced barriers for the enrollment and recertification processes, such as allowing video and telephone appointments, and extending recertification periods.

12. What suggestions do you have for how USDA can effectively assess and measure its outreach and inclusion of underserved groups and individuals?

12.A. Use an Indigenous Self-Determination Evaluation Model to develop and assess equity among Indigenous peoples. The Urban Indian Health Institute has collected resources for Indigenous Evaluation in an annotated bibliography included as an attachment to this comment. Key highlights are below.

An Indigenous Evaluation Model includes

- centering the lived expertise of community members whose needs are being addressed so that program design and evaluation reflect their needs and values, rather than relying on external, non-Tribal evaluators;⁷²
- using an assets-based approach, rather than a deficits-based approach, to program evaluation;⁷³ and

- agencies should train Tribal members to be evaluators, researchers, and program staff to “design and implement evaluation on their own.”⁷⁴

12.B. Use sustainable strategies to engage individuals with lived expertise to help improve policies. It is crucial to foster dialogue around program strengths and opportunities for improvement from the perspectives of the diversity of current and past participants, as well as those who have been eligible for programs but never participated. Their expertise should be used to inform why disparities in enrollment or outcomes exist and how to improve policies and procedures. To do so, outreach tools should engage participants in a way that is authentic, values their expertise, and is minimally intrusive. Outreach efforts can be measured by response rates.

One example is soliciting feedback through apps that provide services for program clients. For example, Propel administers an app called “Fresh EBT” that helps SNAP participants monitor their EBT balance, receive important updates about program changes, and access linkages to other resources.⁷⁵ During COVID-19, the app has been used to field surveys to track hardship and access to programs among Fresh EBT users. Survey results can be disaggregated by gender, race, and ethnicity, and are published in reports and shared through monthly webinars hosted by FRAC. This type of rapid survey data could help coordinate efforts between agencies. For example, the May 2021 report found that about one-quarter of Fresh EBT households eligible for the Child Tax Credit will not receive it in July because they did not file their 2020 taxes.⁷⁶

Advocates in Pennsylvania and Georgia have focused on ensuring that WIC parents’ perspectives are heard and inform decisions on how WIC will operate.

- Just Harvest in Pittsburgh, Pennsylvania, works closely with community members, including WIC parents. They provide the parents with advocacy training to empower them to testify at WIC listening sessions and other opportunities.
- In Georgia, the Atlanta Community Food Bank conducted focus groups with WIC parents and parents who are eligible but are not participating. The participants represented the racial and ethnic makeup of eligible families in Georgia. The findings have informed the WIC state agency and a community coalition formed to promote WIC improvements.

Other strategies to solicit participant feedback about programs and inclusion efforts include [periodic summits](#), meetings, listening sessions, and/or task forces.^{77,78,79,80} These organized events provide forums to hear from providers, clients, those likely eligible for programs, and a full range of partners about the facilitators and barriers to participation and success. These efforts should center the needs, feedback, and leadership of individuals with lived expertise and employ a racial equity framework.⁸¹ Key findings and actions can be summarized and widely distributed at the regional and national level.

12.C. Expand opportunities to engage with policy makers by expanding the use of virtual town halls, listening sessions, and office hours after the pandemic is over. During COVID-19 virtual visits and other forms of engagement

have opened up opportunities to reach underserved communities and can serve as models for engaging program participants. For instance, FRAC's partnering state and local anti-hunger advocates have employed virtual lobby visits where they were able to incorporate advocates with lived expertise to speak to elected officials. In contrast, in-person engagement can have cost-prohibitive barriers (such as transportation, lodging costs, and taking time off work). These barriers prevent those who are experiencing hunger and poverty, and are critical to engage in policy solutions, from participating.

Still, access to virtual engagement must be examined to ensure that it does not have unintended consequences and exacerbate disparities. Virtual engagement should take into account language access and accommodations, like closed captioning, and availability of reliable and high-speed broadband in rural areas to overcome barriers to participation. In-person engagement and other forms of engagement are still important and may be more accessible than virtual participation depending on the community. Agencies should assess the barriers faced by communities and then work to address those barriers to maximize engagement. Public comments, like this solicitation, are also good opportunities, but the comment period should be 90 days in order to allow time for coalitions of community-based organizations and their constituents to respond.

12.D. Increase local agency capacity to track participation and utilization, evaluate progress, and adapt plans to expand access. FRAC recommends comprehensive methods of measuring program performance in order to measure a benefit program's outcomes or whether it has been implemented as intended.

State agencies administering SNAP and WIC can help local agencies maximize caseloads through caseload-based performance standards, tracking tools, and timely data. Local SNAP and WIC agencies can manage caseloads, examine the impact of their work, revise plans, and identify areas of unmet need among underserved populations through a variety of mechanisms. Methods include tracking participation and redemption rates based on demographics and equity indicators, needs assessments through data matching and geographic information services (GIS) mapping, and engaging families representing a variety of racial, ethnic, and other categories of identity in a dialogue.

FRAC is offering WIC as a more detailed example. Local agency caseload management and the need for robust caseload performance standards and monitoring have come under increased scrutiny as participation has declined for several years. To increase participation, it is important for state and local agencies to employ effective methods for maximizing caseloads through caseload-based performance standards, tracking tools, and timely relevant data. State agencies can use the data analytics functions of their management information systems to produce daily, weekly, and monthly data; trends; and analysis for local agencies. Most commonly, state agencies distribute monthly reports to local agencies, but local agencies can be given access to the system to create and download reports. Local agencies need to be empowered, funded, and given the necessary training to undertake effective daily tracking, as well as longer-term tracking, and needs assessment. This can be in partnership with the state agency.

WIC Caseload	WIC Benefit Utilization and Redemption	WIC Caseload and Redemption Analysis: Key Categories and Factors	WIC GIS Mapping
<p>Analyze and track:</p> <ul style="list-style-type: none"> • progress in meeting local agency performance standards for caseload targets; • no-shows; • the number of clients added to the program; • the number of clients exiting the program; and • the number of enrolled but not participating clients 	<p>Analyze and track monthly food benefit utilization/redemption rates, trends, and patterns*:</p> <ul style="list-style-type: none"> • the total value of redeemed and unredeemed WIC benefits; • the number of fully unredeemed monthly benefits; • redemption rates by type of participant and food benefit category; and • redemption by store. <p><i>*States should take advantage of the enhanced redemption data available through EBT.</i></p>	<p>Analyze WIC caseload and redemption data using:</p> <ul style="list-style-type: none"> • WIC categories: pregnant, breastfeeding, and non-breastfeeding postpartum women; and infants and children by age (1 year, 2 years, 3 years, and 4 years old); • equity-related characteristics in the WIC database, including race, ethnicity, income, and zip code; and • other potentially relevant variables available in the database, including the numbers and types of family members participating in WIC and other federal nutrition programs. 	<p>Create GIS maps using:</p> <ol style="list-style-type: none"> 1. WIC data: <ul style="list-style-type: none"> • clinic, store, and participant locations; and • area-level participation and benefit redemptions rates. 2. Equity indicators and metrics, including <ul style="list-style-type: none"> • Census Bureau data on race, ethnicity, poverty, language use, food deserts, unemployment, and health; and • structural drivers of health determinants, e.g., geographic distribution of life expectancy by zip code, rates of community disinvestment, and incarceration rates.⁸²

Engaging a Diversity of Families in a WIC Dialogue:
State and Local WIC Agencies

<ul style="list-style-type: none"> • Field WIC satisfaction surveys. • Ask WIC parents to recommend survey questions • Share survey findings <p><i>Survey results should be understood in the context of participants' category, race, ethnicity, and income.</i></p>	<ul style="list-style-type: none"> • Review comments and complaints submitted to WIC and those made on WIC's webpage and social media. • Establish ongoing feedback opportunities through websites/apps and local offices, e.g., "How are we doing?" 	<ul style="list-style-type: none"> • Conduct interviews via phone or in-person. • Conduct focus groups with current WIC recipients and eligible non-participants who represent the diversity of eligible populations. <p><i>Interviewers and facilitators should represent the surveyed group.</i></p>	<ul style="list-style-type: none"> • Host regularly scheduled online conversations. <p><i>At least one of the hosts should be able to communicate in the primary languages spoken in the state or service area.</i></p>	<ul style="list-style-type: none"> • Hold local or regional WIC listening sessions. • Promote opportunities for feedback. • Work with partners to get the word out (advocates can help prepare speakers). <p><i>Sessions can cover many topics, including the State WIC plan.</i></p>
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14. Have you made recommendations for improvement in the past to USDA? If so, please list or attach those recommendations.

FRAC Letters and Comments to the USDA (attached)

- Letter to Secretary Vilsack on Medicaid Direct Certification
- Letter to Secretary Vilsack on community outreach from FRAC and UnidosUS
- Comment to Secretary Vilsack on evaluation of the Thrifty Food Plan
- Memorandum to Deputy Under Secretary Stacy Dean from FRAC and Protecting Immigrant Families on supporting access to SNAP for immigrants
- Comment to FNS on WIC Listening Sessions

Additional recommended resources:

- UIHI annotated bibliography on Indigenous Evaluation (attached)
- Book: *Administrative Burden: Policymaking by Other Means*.⁸³
- Report: *Technology, Data, and Design-Enabled Approaches for a More Responsive, Effective Social Safety Net*⁸⁴

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Note: This book details how administrative burdens are consequential, affect some groups more than others and reinforce inequalities in society, and are constructed and subject to change through deliberate, political choices. SNAP is one of the programs covered.

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