



August 14, 2021

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

Dear Secretary Vilsack,

Thank you for the opportunity to respond to USDA's request for comment in support of "Identifying Barriers in USDA Programs and Services; Advancing Racial Justice and Equity and Support for Underserved Communities at USDA."

Project Bread is a statewide anti-hunger organization committed to connecting people and communities in Massachusetts to reliable sources of food while advocating for policies that make food accessible—so that no one goes hungry. As such, Project Bread believes racial justice, diversity, equity, and inclusion are all critical to our mission. Throughout the pandemic, we have highlighted the higher rates of food insecurity among Black, Latino, Asian, and mixed-race households and continue to use a racial equity lens when proposing policy change and implementing programs.

Project Bread, through our FoodSource Hotline, screens callers for SNAP eligibility and provides callers across Massachusetts with information and referrals to community food resources including information on Pandemic EBT (P-EBT) and summer meal sites. Additionally, Project Bread employs SNAP enrollment coordinators who work directly in community health centers to meet with food-insecure families and individuals, and provide the information, assistance, and advocacy they need to enroll in SNAP. Most recently, Project Bread launched the Flexible Services program in April 2020 with our state's Medicaid Office, MassHealth, three months ahead of schedule in response to the pandemic. Our coordinators work with MassHealth patients to utilize Medicaid dollars on "non-medical" expenses to address social determinants of health. As part of this program, MassHealth patients not currently receiving SNAP benefits are encouraged to apply and referred to the FoodSource Hotline.

Additionally, Project Bread has more than twenty years of experience working to boost participation, quality, and nutrition of school meals as a strategy to end childhood hunger. In partnership with the Massachusetts' Department of Elementary and Secondary Education (DESE), through the Child Nutrition Outreach Program (CNOP), we provide technical assistance to schools throughout the state to increase participation in both school breakfast and summer meals. In addition, we support schools with implementation of the Community Eligibility Provision (CEP).

Up until recently, and for over a decade, our Chefs in Schools program worked with cafeteria staff to produce meals from scratch that meet high nutrition standards, maintain labor costs, and decrease plate waste. A key component of this program was to ensure student feedback was included in recipe development and adoption leading to introduction of more culturally relevant menu options in many Massachusetts schools.

In the following comments, Project Bread responds to questions 4, 5, 6, 7 and 10 under the General Questions section of USDA's notice. Our comments focus on the Supplemental Nutrition Assistance





Program, the School Breakfast Program, the National School Lunch Program, and the Summer Food Service Program, as they the programs that Project Bread has the most experience supporting.

Project Bread looks forward to working closely with our partners, state agencies, and the USDA to promote equity and racial justice particularly as we seek to solve food insecurity in Massachusetts and beyond.

As an overall principal we believe that racial equity must be integrated from start to finish in the creation, evaluation, and implementation of policies and programs. We suggest if not already in practice, USDA should use the tools created by the [Bread for the World institute](#), particularly their recommended practices on analyzing the outcomes of programs and policies on each racial and ethnic group and analyzing why outcomes are different for different groups. Project Bread also stresses the importance that the department needs to further consult with experts of color and partners in the community to ensure opportunities and challenges are not overlooked.

We also believe improvements can be made in:

Data collection on food insecurity

Currently USDA food security and insecurity data is only released annually and only disaggregates by age, race and ethnicity, area of residence, and household income on the national level. On the state level, the Household Food Security in the United States report only includes the number of households and prevalence of food insecurity, and very low food security. The USDA measurement of food insecurity is largely viewed as the gold standard indicator of hunger in the United States. The absence of disaggregation on the state or local level makes it difficult to consistently measure progress over time on food insecurity among different demographics, which in turn makes evaluating success of federal nutrition programs and other interventions challenging.

We encourage USDA to work with the Census Bureau to disaggregate and report food insecurity on the smallest geographic level possible, preferably census-designated places (i.e. cities, towns, villages), but state or county data would be also be significant improvements over current practices. Furthermore, this data should be disaggregated by income, age, race and ethnicity, disability status, and other demographic indicators to monitor where efforts to reduce food insecurity have been fruitful and where additional investments may be necessary.

USDA should also urge the Census Bureau to disaggregate this data and related data by ethnicity or country of familial origin. While this applies to several races, this problem is well illustrated among communities grouped by the Census Bureau under “Asian.” While this label may be useful for broad analysis it obscures the diversity of the Asian experience in America. [In a study published in 2018 using California Health Interview Survey data](#), researchers found a 16.42% food insecurity rate among Vietnamese respondents contrasted with 2.28% food insecurity rate among Japanese respondents.

The Census Household Pulse survey conducted during the pandemic has allowed organizations such as Project Bread to monitor food insufficiency closer to real time. We encourage the USDA to explore more frequent data collection and reporting as to give policy makers and community partners better data on food insecurity throughout the year.





Cross-agency collaboration and automatic eligibility

Adjunctive eligibility for the Special Supplemental Nutrition for Women, Infants, and Children (WIC) and direct certification for school meals have increased access to child nutrition programs, reduced barriers to families, and decreased administrative costs for program sponsors. This approach should be piloted, supported, and evaluated by USDA in as many programs as possible in addition to working with other federal or state departments and agencies to share data in order to streamline access to safety net programs for eligible households.

One possible avenue is to support states, such as Massachusetts, in piloting and ultimately establishing common applications that tie together Medicaid, cash assistance, SNAP, and other programs with similar eligibility requirements.

Anti-racist and anti-bias training

Minimizing and counteracting the effects of systemic, institutional, and interpersonal racism is an ongoing effort. The USDA must continuously provide mandatory trainings to Food and Nutrition Service staff to conduct the important work of the agency in as anti-racist ways as possible. Within its authority, the USDA should also require its state partners to create a culture of anti-racism.

Diversity of program officers and languages spoken

While anti-racist and anti-bias training coupled with a culture committed to these values will go a long way to enhancing federal nutrition programs and breaking down barriers, there also needs to be diversity of staff at all levels of USDA, particularly the Food and Nutrition Service. This includes racial and ethnic diversity, but also diversity of experiences, particularly individuals with lived experience of food insecurity and poverty, and a diversity of language/cultural competencies.

In this goal, USDA should also use its authority and funds to encourage state partners to diversify their workforces. In a recently released research report on the barriers to SNAP, Project Bread found that language continues to be a barrier across racial and ethnic groups including 26.6% of white respondents and 55.8% of Asian survey respondents. Language also contributes to other findings related to misinformation, uncertainty around impact on immigration status, and fear of judgement. Ensuring native and fluent speakers of languages spoken by clients can help fully and clearly communicate messages to clients and the public.

Support community-based service providers

Federal funds and reimbursements are designed to pay for more than just food or benefits, but also for program operation for service providers. Aside from the general need to increase reimbursements and benefits to better serve clients, low reimbursement rates also make it difficult for smaller, community-based, and BIPOC led service providers to provide SNAP outreach or operate CACFP and SFSP meal programs. Instead, larger organizations or those led by white staff may or may not fill the gaps leaving communities either with no service providers or service providers staffed by non-com-





munity members. While in many cases the presence of a provider is better than no provider, providers with deeper cultural and interpersonal ties with the community are often more successful at diffusing stigma and reaching households.

The community of East Boston is an example of this opportunity. In 2020, Project Bread in partnership with Children’s HealthWatch released a [report on The State of Hunger in Massachusetts](#) which paired statewide data with a community snapshot of East Boston using surveys and focus groups. Among the heavily Latino participants in the study (88 percent of participants), 56 percent reported currently participating in WIC, but only 29 percent in SNAP, 8 percent in free or reduced-price school meals, and only 5 percent in summer meals. The child nutrition numbers are striking as Boston Public Schools and many of the charters located in Boston utilized the Community Eligibility Provision and every summer there is a significant number and variety of East Boston SFSP sites. During focus groups participants shed light on this wide gap in program participation: the local WIC office was operated and co-located with the East Boston Neighborhood Health Center, a trusted community partner. For participants WIC was tied to caring and responsible caregivers whose roles make them responsible for supplementing a family’s nutrition.

While the specific circumstances of the East Boston Neighborhood Health Center may not be easily replicated, USDA can communicate the need for higher reimbursements and grant funding to allow growth in community-based and BIPOC-led service providers for all its programs.

Support awareness campaigns that address misinformation and raise awareness

In our experience of promoting the Summer Food Service Program, we have found that one of the most persistent challenges is lack of awareness and misinformation about the program. Families either do not know about meal sites, believe meal sites are not open to them, or are misinformed about program rules that lead to heightened levels of stigma. This is particularly acute among families concerned about immigration. [In East Boston, only 5% of survey participants reported utilizing SFSP despite nearly two-thirds reporting food insecurity \(59%\).](#)

In our [2021 study on barriers to SNAP](#), 46.4% of participants reported concern about taking away resources from others who may need it more, 38.6% reported concern about being judged for using SNAP, and 31.8% reported knowing little or nothing about SNAP. As mentioned above, fear of immigration status was a concern for 24.1% for white participants, 30.4% for Latino participants, and 38.4% for Asian participants.

Since the beginning of the COVID-19 pandemic, Project Bread has increased awareness building around federal nutrition programs, including the Summer Food Service Program and SNAP, through large-scale, multilingual campaigns. These efforts have included a comprehensive set of tactics, including out of home advertising, targeted digital campaigns, and outreach through community organizations. We have found that there is a continued need to increase multilingual awareness and outreach—and when efforts are made, there is a huge opportunity to expand awareness. As a result of this awareness building, an average of 35% of calls coming to our FoodSource Hotline during the campaign came in languages other than English, compared to roughly 20% of calls prior. During this campaign, the most visited website page was a Spanish language “Get Help” page providing available food resources.





It is critical for USDA, its state partners, and service providers to increase investments in awareness building that is multilingual, multicultural, and focused on normalizing nutrition assistance across programs. Whenever possible these campaigns should involve trusted community-based partners who can help mitigate the mistrust and confusion felt by far too many households particularly after the harmful decisions and rhetoric by the previous administration such as the problematic revisions to the “public charge” rule.

Supplemental Nutrition Assistance Program

While many of the above general recommendations touched upon SNAP, the following comments and recommendations focus specifically on SNAP:

Improve demographic collection and reporting in SNAP

As with food insecurity data, there is a critical need to collect more accurate demographic information within SNAP and more robust reporting on the state and local level to ensure the benefits of SNAP are reaching historically marginalized communities. This data would also help to be able to identify populations and geographies where SNAP outreach has been successful or areas that may need additional support for SNAP to have the maximum impact on food insecurity.

Currently applicants are allowed to decline to answer questions related to race and ethnicity. These options should be preserved, but USDA and its state agency partners can help reassure applicants this data will not impact their case or immigrations status and is important in informing SNAP.

Expand eligibility for immigrants

The previous administration’s divisive and harmful policies toward immigrants further exacerbated the stigma and fear felt by immigrants by creating an additional barrier to SNAP and creating greater confusion in other federal nutrition programs. It is worth repeating that we are thrilled that the changes to the “public charge” policy were challenged in the courts and the current administration chose not to appeal—effectively ending its adoption and implementation. That said, the USDA and the entire federal government now must make a strong commitment to providing critical resources, like nutrition benefits, to all legally present residents and citizens regardless of immigration history and ending the stigma felt by immigrants. Food is a basic right and providing these resources to our neighbors benefits us all.

Current USDA eligibility guidelines for SNAP allow some groups of legally present immigrants to receive SNAP if they are otherwise eligible while others are not. This contributes to the general confusion and misinformation about SNAP eligibility. Given SNAP’s income tests, immigrant eligibility rules also compound the other challenges faced by immigrants, particularly immigrants of color who may face discrimination in employment and in their everyday lives.

Therefore, we urge USDA to work with state agencies and Congress to allow a greater number of immigrants to receive SNAP without a waiting period.





Time limits and work requirements

Project Bread and our colleagues were relieved to see the harmful rule on so-called Able-Bodied Adults Without Dependents proposed by the previous administration vacated, but the three-month limit on benefits continues to be problematic. It is well documented that the time limits have a racist history. In the 1960s, Rep. Jamie Whitten was nicknamed the “permanent secretary of agriculture” and with this power he helped weaken the expansion of food stamps. Using a racial slur, he said if hunger was a not a problem, Black people would not work.

While such overt racist language is no longer used to justify time limits, the backward logic persists adults without dependents are required to work for food even if work opportunities may not exist. In reality, this leads to low-income adults struggling to find work while simultaneously facing food insecurity. This problem continues to be particularly acute for demographics that face discrimination such as BIPOC, differently abled persons, or older workers who struggle to find work, or find only part time, temporary, or shift work that in many times fail to fully comply with the requirements for SNAP benefits.

USDA should phase out time limits as much as possible under its authority and provide research that makes the case for Congress to eliminate time limits legislatively.

Child Nutrition

In addition to the general comments and recommendations, the following is our feedback on the School Breakfast Program, the National School Lunch Program, and the Summer Food Service Program:

Take steps to make school meals for all a reality

Stigma continues to be a major problem in the school meal programs with parents concerned with filling out applications for a myriad of reasons similar to the concerns with SNAP: fear of judgement, fear of immigration status, and misinformation. Even if and when students qualify for free or reduced-price meals, the low participation rates in school meals keeps the myth alive that reimbursable meals are only for the “poor kids.” According to the USDA’s own research schools that have adopted universal free school meals through the Community Eligibility Program see an increase in overall participation. Several studies have found this increase happens among free, reduced-price, and full price status households, but the greatest increases were among students who were previously expected to pay a fee.

While a transition to a permanent universal school meals program would require an act of Congress, we urge USDA to (1) use this coming school year as an opportunity for research and evaluation on how universal school meals benefits students, schools, and community and (2) expand current provisions, such as the Community Eligibility Provision, as much as possible by lowering the eligibility threshold and increasing the reimbursement multiplier.

Feeding America estimated that in 2019, 23% of food insecure children lived in households with incomes above 185% of the federal poverty level making them likely ineligible for free or reduced-price school meals. The impact of racism and racial bias make the impact of stigma and other barriers





worse. The only way to ensure all children can equitably access critical nutrition during the school day is to remove these barriers.

Expand area eligibility rules for SFSP and CACFP

When working with community leaders and sponsors, Project Bread has often experienced circumstances in which an ideal meal site for a community such as a library, public pool, or well trafficked park is located just across the street from an eligible census tract to host an open meal site. While this is a challenge everywhere, this can be an acute challenge in historically marginalized communities where public spaces may be sparse or underutilized. By eliminating this rule, as was done during the pandemic, or expanding available locations by lowering the threshold, USDA can ensure children and teens can have access to meals at a place that is safe, convenient, and inviting to them.

In closing we want to reiterate our appreciation that USDA is seeking to deepen its commitment to racial justice and equity. Project Bread stands ready to work with the USDA and its state partners to address food insecurity and promote equity.

Thank you,

Erin McAleer
President & CEO, Project Bread

