

October 13, 2023

Food and Nutrition Service
United States Department of Agriculture
1320 Braddock Place
Alexandria, Virginia 22314

Dear Deputy Under Secretary Stacy Dean and Administrator Cindy Long:

On behalf of a group of organizations that interact widely with and care deeply about USDA food distribution programs, we write to thank you for the opportunity to comment on the proposed rule on access and parity and to share our expertise, experiences and ideas for how to strengthen such programs.

Many of the programs in this rule will benefit from updates, such as modernizing eligibility standards and increasing opportunities for access. Lessons we have all gleaned from the pandemic are reflected in the proposed changes and will enable these programs to thrive for years to come.

We also recognize that some of the proposals may present limitations to the efficient, effective and equitable administration and distribution of USDA foods. Together, our organizations encourage USDA to consider the following when crafting the final rule:

TEFAP

- Implement a minimum income eligibility threshold of 185% of the federal poverty level; remove the proposal for a maximum income eligibility threshold, but if deemed necessary, increase the maximum threshold to at least 400% of the federal poverty level with opportunity for states to apply for higher thresholds.
- Disallow the requiring of address or identification to verify residency.
- Ensure confidentiality regulations are aligned with ongoing best practices utilized in current electronic intake platforms.
- Require states to publicly post their TEFAP state plans.
- Expand access to TEFAP in tribal communities and to historically underserved populations.

CSFP

- Increase the maximum income eligibility threshold to 185% of the federal poverty level, a minimum income eligibility threshold of 130% of the federal poverty level.
- Allow broad use of categorical eligibility to streamline eligibility.
- Allow for alternative methods of identity verification.
- Require states to publicly post their CSFP state plans.

FDPIR

- Consider greater flexibility in income eligibility thresholds, deductions and administrative funding calculations.

- Work closely with tribal leaders to continue implementing revisions to food box contents, urban service and waivers.

USDA Foods in Disaster

- Allow for the simultaneous provision of the Disaster Supplemental Nutrition Assistance Program (D-SNAP) and USDA disaster foods.

Thank you for your continued commitment to ensuring USDA foods can best support people experiencing food insecurity across the country. We look forward to working with you to create food distribution programs that are accessible and equitable.

Best,

Feeding America

Academy of Nutrition and Dietetics

Alliance to End Hunger

American Commodity Distribution Association (ACDA)

Center for Law and Social Policy (CLASP)

Center for Science in the Public Interest (CSPI)

Church World Service

Coalition on Human Needs

DAVOYA Community Development Corporation

FoodFinder

Food Research & Action Center (FRAC)

Grubhub

Hunger Free America

Meals on Wheels America

National CSFP Association

National Coalition for the Homeless

National Council on Aging

National Resource Center on Domestic Violence

National Women's Law Center

NETWORK Lobby for Catholic Social Justice

Pax Christi USA

Public Advocacy for Kids (PAK)

RESULTS