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**Re: Docket No. FNS-2023-0026; Improving Access and Parity in Food Distribution Programs**

The Child & Student Nutrition Alliance (CSNA) submits these comments in response to the U.S. Department of Agriculture's (USDA) "Improving Access and Parity in Food Distribution Programs" proposed rule, which makes the Commodity Supplemental Food Program (CSFP), the Food Distribution Program on Indian Reservations (FDPIR), The Emergency Food Assistance Program (TEFAP), and USDA Foods disaster response programs more accessible and makes parity improvements.

CSNA is a coalition of national, state, and local organizations representing the health and well-being of children dedicated to elevating the importance and urgency of a robust federal investment in the highest quality nutritional standards and fully funded programs to eliminate child and student hunger. As a coalition working to support the healthy development of America's children, we appreciate USDA's commitment to expanding access to food programs that supplement children's dietary needs.

Nine million children across the United States experience food insecurity. Access to proper nutrition during childhood is instrumental to a child's development and ultimate success in life. Food insecurity is specifically associated with poorer physical and mental health, lower school performance, and diminished psycho-social functioning. Many of these children rely on FNS programs, especially FDPIR and TEFAP, to receive the food they need every day and in emergencies. While we commend FNS for recognizing the importance of these programs and for taking steps to ensure more children receive the food they need, we also urge you to take additional steps to expand eligibility.

The Food Distribution Program on Indian Reservations provides food purchased and shipped by the U.S. Department of Agriculture to low-income families for about 276 Indigenous tribes.<sup>1</sup> With SNAP offices and participating food stores in short supply, FDPIR is critical to helping tribal communities put nutritious food on their children's tables. Nearly 25% of indigenous households are food insecure, which is nearly double the rate of white Americans.<sup>2</sup> Additionally, food on reservations is at times more

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<sup>1</sup> "FDPIR Program Fact Sheet." Food and Nutrition Services. January 1, 2018.

<https://www.fns.usda.gov/fdpi/fdpi-fact-sheet>.

<sup>2</sup> Maillacheruvu, Sara Usha. "The Historical Determinants of Food Insecurity in Native Communities." The Center for Budget and Policy Priorities. October 4, 2022.

<https://www.cbpp.org/research/food-assistance/the-historical-determinants-of-food-insecurity-in-native-communities>

expensive than average, with some studies finding food costs to be up to 85% greater for necessities like milk or bread.<sup>3</sup> The proposed rule takes steps to expand accessibility for urban areas without a waiver and increases standard deductions to the rate of those used for the Supplemental Nutrition Assistance Program (SNAP). Additionally, it requires USDA to periodically review the foods offered by the program with respect to the Dietary Guidelines for Americans (DGAs). For centuries, Native American children have borne the brunt of inequitable treatment, and these long overdue parity improvements in federal nutrition support will help provide more equitable access to food.

The proposed rule also makes TEFAP more accessible for children. TEFAP provides foods grown in the U.S. to states, whose organizations distribute them to soup kitchens and food pantries. Nearly one-fifth of families headed by single mothers rely on food banks during the COVID-19 pandemic.<sup>4</sup> Research also shows that those who access food banks have higher fruit and vegetable intake, which is linked to lifelong health benefits for young children.<sup>5</sup> Eligibility for TEFAP access is based on income and under current law there is no required income range set by the federal government. The proposed rule requires that states must serve participants up to 185%-250% of the Federal Poverty Level (FPL). Given that some states only allow families to qualify if they are 125% above the FPL, we commend USDA for expanding access for low-income children. However, we encourage USDA to raise the maximum threshold to allow more families access to these critical food sources. Some states offer TEFAP benefits at 400% of the FPL, and while this is feasible with a waiver, we urge USDA to allow these states to continue their expanded access.

## Conclusion

Thank you for the opportunity to submit comments on this proposed rule. CSNA supports USDA's efforts to ensure more children have access to nutritious food. USDA's approach is a much-needed step in strengthening its food programs and will help more of our most vulnerable children in all communities access the nutrition they need to thrive in childhood and beyond. We look forward to working with the USDA to support the implementation of this rule.

Sincerely,

The Child & Student Nutrition Alliance

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<sup>3</sup> Ibid.

<sup>4</sup> Charity, Ayana and Byrne, Anne. "U.S. households with children headed by single females used food pantries more than others over last two decades." Economic Research Service, U.S. Department of Agriculture. August 1, 2023. <https://www.ers.usda.gov/data-products/chart-gallery/gallery/chart-detail/?chartId=107010#:~:text=Among%20households%20with%20children%2C%204.4,male%2Dheaded%20households%20used%20them.>

<sup>5</sup> Bertmann, Farryl et al. "The Food Bank and Food Pantries Help Food Insecure Participants Maintain Fruit and Vegetable Intake during COVID-19." *Frontiers in Nutrition*, Vol 8. August 6, 2021. [https://www.ncbi.nlm.nih.gov/pmc/articles/PMC8378669/.](https://www.ncbi.nlm.nih.gov/pmc/articles/PMC8378669/)