

June 30, 2021

Submitted electronically to [FNS.FoodPlans@usda.gov](mailto:FNS.FoodPlans@usda.gov)

Deputy Under Secretary Stacy Dean  
Food & Nutrition Service  
US Department of Agriculture  
Braddock Metro Center II  
1320 Braddock Place  
Alexandria, VA 22314

Re: USDA FNS Request for Comments on Updating the Thrifty  
Food Plan

Dear Deputy Under Secretary Dean:

On behalf of **MAZON: A Jewish Response to Hunger**, I am writing today regarding the United States Department of Agriculture (USDA) Food and Nutrition Service's (FNS) request for input to inform the agency's effort to re-evaluate the adequacy of benefits provided by the Supplemental Nutrition Assistance Program (SNAP) through the Thrifty Food Plan (TFP) as directed by the 2018 Farm Bill, and in support of President Biden's Executive Order of January 22, 2021 on COVID Economic Relief. MAZON appreciates the thoughtful process USDA has already undertaken by holding TFP listening sessions to hear directly from SNAP participants and anti-hunger advocates who work directly with SNAP participants.

While SNAP is recognized as USDA's largest and most effective hunger-fighting tool, [studies have shown](#) that the program fails to achieve food security for over half of households receiving SNAP benefits. In addition, USDA's recent report "[Barriers that Constrain the Adequacy of SNAP Allotments](#)" confirms that the most common barrier for 61% of participants was the affordability of foods that are part of a healthy diet. Further support for the inadequacy of the current SNAP benefit amount comes from a [2018 Urban Institute study](#) finding that the

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average cost of a low-income meal is \$2.36, 27% higher than the SNAP benefit of \$1.86 in 2015.

As the TFP is the basis for determining a nutritionally sufficient diet and the maximum household benefit amounts for the Supplemental Nutrition Assistance Program (SNAP), we recognize this critical opportunity to address the longstanding issue of SNAP benefit inadequacy in order to increase the nutrition security and health of the over [42 million low-income Americans](#) who currently participate in the program.

Inspired by Jewish values and ideals, MAZON is a national advocacy organization working to end hunger among people of all faiths and backgrounds in the United States and Israel. For over 36 years, MAZON has been committed to ensuring that everyone has access to the resources they need to be able to put food on the table. MAZON is a leading voice on anti-hunger issues, particularly for populations or on issues that have been previously overlooked or under-addressed—this includes food insecurity among currently-serving military families, veterans, single mothers, LGBTQ older adults, Americans in Puerto Rico and Tribal Nations. It is with this experience and focus that we address USDA's request for comments on updating the TFP.

The TFP has not been meaningfully updated in 46 years, and in that time the barriers and costs of accessing and preparing nutritious food have increased tremendously. **A re-evaluation resulting in an increase to the TFP is a necessary step to ensuring the SNAP program meets the needs of the people it is designed to serve.**

MAZON's decades of advocacy on behalf of and in partnership with historically excluded and vulnerable populations grants us the expertise to know that the adverse effects of an inadequate SNAP benefit are felt most harshly by those who already face unique barriers to food security — particularly LGBTQ older adults, Tribal citizens, and residents of Alaska, Hawaii, and the United States Territories.

## **Seniors including LGBTQ older adults**

With one in five Americans [projected to be age 65 or older by 2030](#) and [more aging into poverty](#) with fewer pensions and inadequate retirement benefits, MAZON has long been concerned with the hunger crisis among seniors especially LGBTQ older adults. The barriers to food security faced by seniors are exacerbated among LGBTQ older adults who often find themselves with a [reduced support system and wariness of facing discrimination when seeking support](#). **Raising the TFP would increase the nutrition security and health of vulnerable LGBTQ older adults who are currently forced to choose between buying food or paying for life-saving medicine.**

The COVID-19 pandemic had a [dramatic impact on the older population](#) as they proved more susceptible to severe illness and death, especially among those with chronic health conditions that can be worsened due to lack of access to nutritious foods.

In partnership with [SAGE](#), the oldest national LGBTQ elder advocacy organization in the US, MAZON documented powerful stories from low-income LGBTQ seniors experiencing food insecurity. The following story magnifies the importance of access to adequate SNAP benefits [to improve nutrition outcomes and lower health care costs](#):

[Barbara's story](#) tells how losing a spouse, burning through savings, enduring a healthcare crisis and the inadequacy of Social Security benefits left her unable to afford a healthy diet and needing help to eat-

*"But to be standing in a line with people who need food? It's humiliating. But the food pantry, and free senior dinners, is how I get enough to eat."*

## **Tribal Nations**

For nearly a decade, MAZON has partnered with Native-led organizations including the Indigenous Food and Agriculture Initiative at the University of Arkansas School of Law (IFAI), the Intertribal Agriculture Council (IAC), the National Association of the Food Distribution Program on Indian Reservations (NAFDPIR), and the Native American Agriculture Fund, to increase food security and food sovereignty in Indian Country. MAZON would like to echo our support for the recommendations submitted by IFAI on USDA's re-evaluation of the TFP and summarized below:

With 25% of all American Indians and Alaska Natives families in both Indian Country and urban areas relying on SNAP for their primary nutrition needs prior to the pandemic, USDA has a crucial opportunity to incorporate culturally appropriate food considerations into any TFP calculations. MAZON and IFAI ask that USDA:

**Consider the cost of culturally appropriate and traditional foods.** Recognizing the cultural significance and [documented health benefits](#) to consuming traditional foods like salmon, wild rice, bison and more is an essential step to any evaluation of the TFP. Due to colonization and the resultant loss of Native access, these foods are not widely available and are largely sold as niche products with higher price points, making it difficult for AI/AN SNAP participants to purchase these foods with the current TFP calculations.

**Consider the cost of healthy food options in rural and remote areas especially in light of supply chain issues exacerbated by the COVID-19 pandemic:** Getting a regular supply of fresh, healthy food to rural and remote locations is an expensive challenge, and the pandemic only exacerbated this pre-existing issue, driving up prices for these products and making it even harder for SNAP benefits to last the entire month. The increased cost of food faced by Tribal citizens and

other SNAP participants in rural and remote areas should be factored into any evaluation of the TFP.

**Consider the extraordinary travel distance to SNAP vendors for rural and remote participants in Indian Country:** Healthy food access is made even more challenging for SNAP participants in very rural and remote areas of Indian Country—it's not unusual to drive four hours or more to only to find there is very little healthy food on store shelves. The food available in these areas also suffers from the travel required, as refrigerated and frozen items also must travel four hours in high temperatures to reach their destination. These transportation costs must be taken into better account for TFP calculations.

### **Learning from Alaska/Hawaii/Guam/US Virgin Islands**

Due to higher costs of living and transportation, [Alaska, Hawaii, Guam and the US Virgin Islands](#) have higher benefit SNAP allotments than the lower 48 states, DC and Puerto Rico. Food access issues amidst the COVID-19 pandemic illustrated that many areas in the contiguous United States, especially those that are rural and remote face higher food costs. A re-evaluation of the TFP should take into account these regional differences in food costs.

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As the COVID-19 pandemic highlights the importance of nutrition assistance in the lives of low-income families and individuals across the country, now is the time for the USDA to strengthen SNAP, the country's largest and most effective response to hunger in the US, by re-calculating the TFP to more accurately reflect the costs of an adequate, nutritious and culturally appropriate diet across the many cultures that comprise American society.

We applaud the Biden-Harris administration's and USDA's commitment to meaningfully address food insecurity in the US and fast-tracking the evaluation of the TFP. By listening to and responding to feedback from advocates, communities, and people with lived experience about how the Thrifty Food Plan can better serve SNAP participants, USDA has a historic opportunity to ensure that the largest federal anti-hunger program delivers on the promise of genuine nutrition security for millions of Americans.

Sincerely,

A handwritten signature in blue ink that reads "Abby J. Leibman". The signature is written in a cursive, flowing style.

Abby J. Leibman  
President and CEO  
MAZON: A Jewish Response to Hunger