

July 26, 2022

The White House
Department of Health and Human Services

Re: White House Conference on Hunger, Nutrition, and Health

The CEO Action for Racial Equity (CEOARE) Fellowship commends the commitment of the Biden-Harris Administration to convene a White House Conference on Hunger, Nutrition, and Health in September 2022, and the Administration's effort to end hunger and increase healthy eating and physical activity by 2030.

CEOARE is a national fellowship composed of over 100 companies that mobilizes communities of business leaders with diverse expertise, across multiple industries and geographies, to advance public policy in four key areas — healthcare, education, economic empowerment, and public safety. Through corporate and community engagement, our Fellowship is fighting societal systemic racism by advancing racial equity through public policy at the federal, state, and local levels.

Our mission is to identify, develop, and promote scalable and sustainable public policies and corporate engagement strategies that address systemic racism, social injustice, and improve societal well-being, with a focus on issues that disproportionately and systemically impact Black Americans – from cities to rural communities, offices and classrooms, and healthcare networks to criminal justice systems.

A Path Towards Greater Food Equity

The CEOARE Fellowship is bringing business, communities, and policy together to advocate for policy-driven solutions to help address a number of our country's most challenging racial disparities. One of the CEOARE Fellowship's key policy initiatives is A Path Toward Greater Food Equity, which applies a social justice and racial equity lens to advocate for state and federal legislation that aims to increase access to and improve affordability of health food options within Black communities. This is a critical societal issue as 21.1% of Black American households are food insecure compared to 7.1% of white households.¹

This mission of the CEOARE Food Equity policy solution team is to use the influence of CEOARE and our CEO signatories to reimagine, transform, and bring awareness

¹ "Household Food Security in the United States in 2020", ERR-298, U.S. Department of Agriculture, Economic Research Service, September 2021, <https://www.ers.usda.gov/webdocs/publications/102076/err-298.pdf?v=2318.1>

to the issue of food equity to improve the lives of Black Americans who are suffering from food insecurity. Our food equity policy priorities are grounded on two key principles:

- Food is a basic human right and no one should go hungry
- All individuals should have dignified and equitable access to affordable and healthy food options in their community

CEOARE is pleased to provide comments for the Administration's consideration on how to prioritize a racial equity lens at the White House Conference on Food, Nutrition, and Health and provide responses to questions related to four of the pillars that define the scope of the White House Conference on Hunger, Nutrition, and Health, including improving food access and affordability; integrating nutrition and health; empowering all consumers to make and have access to healthy choices; and enhancing nutrition and food security research.

Our Fellowship recognizes the strengths, assets, and leadership in communities across the U.S., and our responses are based on our key priorities to drive racial equity and our work with local organizations, NGOs and policy makers at all levels of government. We have shared our feedback by attending convenings and meetings with collaborators, including the Alliance to End Hunger and the Bipartisan Policy Center, and by participating in the White House's regional listening sessions. Our comments include tangible, actionable items to expand access, streamline processes and help reduce the food inequities that currently exist in our country.

Adopt a Racial Equity Framework at the White House Conference on Food, Nutrition, and Health

The first and only White House Conference on Food, Nutrition, and Health held in 1969 brought together stakeholders and the convening resulted in important policy recommendations that have influenced the nation's nutrition policy agenda for decades.² Today, more than 50 years later, we consider this year's conference as an important opportunity to convene a broad range of stakeholders to identify and update past policy recommendations and develop a thoughtful and robust roadmap to reduce hunger and promote nutrition and health in America.

We appreciate the dramatic steps forward our country has taken in the fight against inequality and racial injustice since 1969, and that Americans have a growing awareness and understanding about societal systemic racism and the need to

² US Government. Proceedings: White House Conference on Food, Nutrition and Health. Washington (DC): US Government Printing Office; 1970. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7279882/>



advance racial equity more broadly. To that end, we want to acknowledge the gaps in knowledge and information that have emerged since the last conference. In particular, from a health perspective, we want to acknowledge and highlight the research and data that Social Determinants of Health (SDOH) disproportionately negatively impact Black Americans. Moreover, we believe a significant root cause of these adverse health and related outcomes for Black Americans is structural racism. From a policy perspective, decisions being made now about barriers to equitable access to food, nutrition, and health may reinforce or deconstruct some of these structural barriers.

In order to fully understand and appreciate racial equality and equity, we strongly recommend that the Administration invite and include the voices of people with lived experiences of hunger and poverty – their personal accounts and experiences – as part of the White House Conference.

Additionally, CEOARE recommends that the Administration incorporate the following questions and broader conference topics into its agenda and strategy for the White House Conference to inform policymaking and help drive equity and benefit all Americans engaging in the broader food ecosystem and programs as part of the Administration's strategy and roadmap to end hunger, improve nutrition, and eliminate disparities.

General Conference Questions & Topics

- How can we improve health outcomes through a robust food strategy and reduce costs to society (e.g., healthcare, lost productivity)?
- How can we make nutritious foods accessible and affordable for all Americans at all times?
- How do we reduce inefficiencies / waste from the system (e.g., food waste, process waste?)
- How do we leverage lessons learned from COVID response to improve the food system, food insecurity, programs, processes, and technology?
- How can we measure success and progress, while improving transparency, accountability and sustainability?

Racial Equity Questions & Topics

- How can we close the racial food insecurity gap?
- How can we close the racial health food access gap? (e.g., grocery access)
- How can we close the racial obesity gap in children?
- How can we close the racial life expectancy gap through food programs?



- How do we drive transparency to verify programs and processes are equitable?
- How can we reduce the disproportionate climate impact of the food system on the Black community?

Responses to Questions from the White House Toolkit

Improve food access and affordability – *End hunger by making it easier for everyone — including urban, suburban, rural, and Tribal communities — to access and afford food. For example, expand eligibility for and increase participation in food assistance programs and improve transportation to places where food is available.*

It is important for all Americans to have access to healthy, affordable food options, yet the lasting effects of systemic racism on food access and security has left many low-income communities with limited access to supermarkets. This directly impacts access to healthy foods and leads to food insecurity in many Black neighborhoods and communities.

We recommend the following improvements to improve food access and affordability:

- Increase full-service grocery options – both brick-and-mortar stores and online store access.
 - Brick and mortar: Governments can create funding incentives to establish new stores in food deserts – areas where access to healthy food is limited and/or there are no grocery stores. There are added benefits to establishing more healthy food retail outlets, including creating new jobs and helping to revitalize low-income neighborhoods and towns. According to the Food Trust, an estimated 24 jobs are created for every 10,000 square feet of retail grocery space.³
 - Online: Allow EBT purchasing, waive membership fees, delivery fees, and create savings in home goods products, too. Several large grocery retailers are innovating in this way. For example, Amazon Fresh pilot program will accept SNAP EBT payments for online orders⁴ and

³ HFFI Impacts: Nationwide Success of Healthy Food Financing Initiatives. The Food Trust. 2017. <http://thefoodtrust.org/what-we-do/administrative/hffi-impacts>

⁴ Amazon, Frequently Asked Questions, SNAP and Sign-up, <https://www.amazon.com/b?ie=UTF8&node=20234203011#:~:text=Amazon%20is%20part%20of%20a,their%20SNAP%20funds%20on%20Amazon.>



Wegmans will allow SNAP EBT payments for Instacart grocery orders, a direct-to-consumer delivery service.⁵

- Create incentives to increase healthy options for smaller retailers and/or vendors. There are opportunities for the public and private sectors to work together on a strategic roadmap to end hunger, improve nutrition, and eliminate disparities. The business community has the opportunity to be part of the solution and meaningful collaboration for lasting change.
 - Reimbursement: Increase reimbursement for small retailers and/or vendors to shift from less than 50 SNAP qualifying SKUs to at least 50 SKUs, with increase in fresh fruit and vegetables.
 - Expand funding for innovative programs, including: Double Up Bucks⁶, Double Up Food Bucks matches EBT dollars so SNAP recipients can get twice the fruits and vegetables; the Gus Schumacher Nutrition Assistance Program (GuSNIP)⁷ provides funding opportunities to conduct and evaluate projects that incentivize the purchase of fruits and vegetables.

One potential barrier for all recommendations listed is providing proper levels of funding and consistent appropriations at the state levels. When we reduce obstacles for all eligible persons including ease of access to stores, limited food choices, ease of transport and travel time, we will close the gaps and inequities in our current system.

Integrate nutrition and health – Prioritize the role of nutrition and food security in overall health, including disease prevention and management, and ensure that our health care system addresses the needs of all people.

As stated in the White House Conference on Hunger, Nutrition and Health: Toolkit for Partner-Led Convenings, “[d]iet-related diseases are among the leading causes of death and disability in the United States – and they have an unequal impact across communities.⁸ Specifically, hunger and diet-related diseases are more common in underserved communities, including [the] Black communit[y].”⁹

A growing body of research shows that centuries of racism has had a profoundly negative impact on Black Americans’ morbidity, mortality, and quality of life – also

⁵ Wegmans Food Markets Now Accepts EBT SNAP Payments for Same-Day Delivery and Pickup via Instacart , PR Newswire, Instacart press release, April 13, 2022, <https://www.instacart.com/company/pressreleases/wegmans-food-markets-now-accepts-ebt-snap-payments-for-same-day-delivery-and-pickup-via-instacart/>

⁶ [Get Twice The Fruits And Veggies With Double Up Food Bucks | DUFB \(doubleupamerica.org\)](https://www.doubleupamerica.org/double-up-food-bucks/)

⁷ [Gus Schumacher Nutrition Incentive Program | National Institute of Food and Agriculture \(usda.gov\)](https://www.usda.gov/programs/gus-schumacher-nutrition-incentive-program/)

⁸ White House Conference on Hunger, Nutrition and Health: Toolkit for Partner-Led Convenings, May 2022, page 2, https://health.gov/sites/default/files/2022-06/White%20House%20Toolkit_6.1.22_508c.pdf

⁹ Ibid.



creating unequal access to a range of social and economic benefits. In fact, the Centers for Disease Control and Prevention declared systemic racism negatively affects the mental and physical health of millions of Black Americans.¹⁰

The research and data are clear that Black Americans' Social Determinants of Health are disproportionately negative. From chronic environment-related conditions such as diabetes, asthma and hypertension to excessive use of force and other misconduct by law enforcement, Black Americans experience devastating outcomes.

The root cause of these adverse health and related outcomes for Black Americans is structural racism. Structural racism is a system of, policies, practices, and norms that directly and indirectly determine opportunity based on the way people look or the color of their skin. It negatively affects the mental and physical health of millions of Black Americans, impacting their morbidity, mortality and quality of life.

CEOARE urges more state and local governments and jurisdictions to acknowledge the problem and declaring racism a public health crisis.

Empower all consumers to make and have access to healthy choices – *Foster environments that enable all people to easily make informed healthy choices, increase access to healthy food, encourage healthy workplace and school policies, and invest in public messaging and education campaigns that are culturally appropriate and resonate with specific communities.*

The importance of all consumers having access to healthy food selections and the ability to make healthy food choices directly impacts health outcomes. Lack of access to nutritious foods is a strongly correlated to higher risk of obesity and other diet-related diseases.¹¹ Consumers who receive public benefits need and want to have increased access to food markets with options for fruits and vegetables and the ability to participate when eligible. The following are recommended.

- For access, increase full-service grocery options – both brick and mortar, and online.
- Expand eligibility and participation in food assistance programs. Not all eligible consumers participate. It is estimated only 82-84% participate in food assistance programs and this does not account for the higher costs of food in the more expensive locations across the U.S.¹²

¹⁰ <https://www.cdc.gov/media/releases/2021/s0408-racism-health.html>

¹¹ HFFI Impacts: Nationwide Success of Healthy Food Financing Initiatives, page 6. The Food Trust. 2017. <http://thefoodtrust.org/what-we-do/administrative/hffi-impacts>

¹² SNAP Participation Rates by State, All Eligible People, USDA, <https://www.fns.usda.gov/usamap>



- Confirm benefit levels reflect modern nutrition guidelines and food costs. The government should align on a bipartisan framework and schedule for refreshing benefits. Recommend the USDA propose options to the Senate and House Agriculture Committees for approval and refresh every 5-10 years
- Recommend creating federal benefits to incentivize healthier eating. Examples where participants have increased buying power include [Double Up Food Bucks](#)¹³ and [GusNIP](#)¹⁴.

Access to nutritious food choices should be equitable across all socioeconomic groups. Education is important as there is often more exposure to less nutritious food choices and consumers may not understand the correlation between food choices and long-term quality of life. Obstacles could include adequate appropriation of funding at all levels and commitment from retailers and consumers to make the recommended changes.

Enhance nutrition and food security research – *Improve nutrition metrics, data collection, and research to inform nutrition and food security policy, particularly on issues of equity, access, and disparities.*

The importance of improved metrics and data collection for Federal food security programs cannot be overstated; gaps in knowledge stemming from lack of data have an impact. Current data submitted to the U.S. Department of Agriculture makes it challenging to identify racial or other societal inequities including, but not limited to access, nutrition, and retail options and/or community practices.

More specific needs for enhancement are listed below:

- A lack of demographic data makes it difficult to verify if and to what extent racial or other societal inequities exist in programs and processes
- Without clear success metrics, the public cannot hold federal / state agencies accountable on racial equity (and other) performance
- Improved data collection and transparency would help identify challenges to and / or detrimental retail practices and/or community practices that impact access to healthy food and support creation of evidence-based incentives in relevant communities (e.g., data on household and retailer SNAP utilization)¹⁵

¹³ [Get Twice The Fruits And Veggies With Double Up Food Bucks | DUFEB \(doubleupamerica.org\)](#)

¹⁴ [Gus Schumacher Nutrition Incentive Program | National Institute of Food and Agriculture \(usda.gov\)](#)

¹⁵ SNAP Participation Rates by State, All Eligible People, USDA, <https://www.fns.usda.gov/usamap>



- Greater visibility can help assess the effectiveness of the \$100B annual investment and identify improvement opportunities (measurement will provide data for more efficient and improved program management).

Below are specific suggestions on how we can enhance or improve nutrition metrics and data collection to support greater food security policy in terms of equity, access and disparities.

- Define success metrics, such as numbers and percentages showing flow-through and churn (# that drop-out) by major process (e.g., food insecurity, program eligibility, program awareness, application, acceptance / rejection, participation, exit from program, and reentry into program)
- Define uniform data collection and analysis model
- Establish reporting process and guidelines to enable appropriate, non-predatory public access to data
- Build process to identify gaps and take action to resolve (e.g., incentives for top performance, guidance or penalty for low performance, best practice sharing)
- Confirm that data is situated within people's actual lived experiences through qualitative data or other modes that show the ways in which the issue is experienced in people's lives¹⁶
- Capture data elements such as: benefits / person, participation, cross-enrollment, SNAP staff and office to participant ratio, vendor stats (by type, distance, etc.), percentage of wasted and percentage of redistributed

In sum, these suggestions are tangible ways in which we can improve metrics to help verify programs and processes are equitable, and support fiscal responsibility by assessing total impact of programs, while identifying continuous, evidence-based improvements. While we strive to use metrics and data to enhance the many benefits and reach that our Federal programs provide, it is important that we continue to balance transparency with privacy considerations and that beneficiary data is not used in a predatory or problematic manner.

Conclusion

Thank you for the opportunity to offer our comments on the proposed pillars for the White House Conference.

CEO Action for Racial Equity is non-partisan and we are committed to collaborating with policymakers to enact policies that bring equity, transparency, and

¹⁶ [Measuring Racial Equity in the Food System: Established and Suggested Metrics \(msu.edu\)](https://www.ceoactionracialequity.com/fellowship@ceoaction.com)



accountability to the Black community. We appreciate the Biden-Harris Administration is holding the upcoming White House Conference on Hunger, Nutrition, and Health and the Administration's call to action for all stakeholders to provide input on how we can work together to achieve the goal of ending hunger and increasing healthy eating so that fewer Americans experience diet-related diseases. We urge the Administration to consider our responses and adopt a racial equity framework in its development of the strategy and roadmap to end hunger, improve nutrition, and eliminate disparities that will be released after the September Conference.

