

July 12, 2022

President Joe Biden  
The White House  
1600 Pennsylvania Ave, N.W.  
Washington, DC 20500 Ambassador

Susan Rice  
Assistant to the President for Domestic Policy  
1600 Pennsylvania Ave, N.W.  
Washington, DC 20500

**Healthy  
Eating  
Research**

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Dear President Biden and Ambassador Rice,

[Healthy Eating Research](#) (HER), a national program of the Robert Wood Johnson Foundation (RWJF) based at Duke University, appreciates the opportunity to submit comments to inform the national strategy that will be released at the White House Conference on Hunger, Nutrition, and Health. HER supports research on policy, systems, and environmental strategies that have strong potential to promote healthy eating among children, especially among population groups that are at highest risk for poor health and well-being and nutrition-related health disparities, such as families with lower incomes and/or individuals that are racially and ethnically diverse. HER is directed by [Mary Story](#), PhD, RD and [Megan Lott](#), MPH, RD is Deputy Director.

Since the program began in 2005, HER has funded nearly 300 research studies centered on understanding the food and nutrition challenges faced by families with low-incomes or populations of color; identifying the underlying causes of poor nutrition, food insecurity, and low access to healthy foods; and determining what policy and system changes work to improve access to healthy foods, optimal diet quality, and health weight and how to scale these efforts. All HER funded research has prioritized the involvement of individuals affected by the issues under study and centering people with lived experiences when feasible. HER research has informed the development and implementation of policies at the federal, state, and local levels and has garnered substantial media coverage. HER's extensive research base can be found [here](#).

The COVID-19 pandemic not only highlighted how closely food, nutrition, and health are intertwined, but also exposed stark nutrition and racial inequities in populations, communities, and across the U.S. food system. To date, little is known about the relationships and interconnections between nutrition, obesity, and food and nutrition security in families and upstream policies related to poverty reduction, economic resources, and housing security. It should be a priority of the White House Conference on Hunger, Nutrition, and Health to illuminate these connections and develop strategies to accelerate progress and drive transformative change in the U.S., relying on the current evidence-base, lived experiences, and organizational input to guide a national strategy.

Our recommendations below highlight key evidence-based policy, systems, and environmental (PSE) strategies that should be strongly considered in the development of a national strategy. These PSE strategies, hyperlinked to the evidence and organized by the White House Conference on Hunger, Nutrition, and Health [pillars](#), have strong potential to reduce inequities related to child health and well-being, are aligned with USDA's commitment to advance nutrition security, and should be prioritized by the Biden Administration.

## **Improve Food Access and Affordability**

*Modernize and expand the most far-reaching and impactful policies and programs recommended below that help prevent millions of families and children from going hungry and have the potential to address gaps in equity that have existed for decades.*

- Supplemental Nutrition Program for Women, Infants, and Children (WIC)
  - [Create](#) federal policy requirements that allow for safe online transactions using WIC EBT/eWIC benefits to modernize and enhance the WIC shopping experience and to ensure an equitable experience for WIC participants.
  - [Support](#) WIC state agencies in the adoption and usage of WIC apps that assist participants with benefit redemption including the ability to: scan bar codes in store to check whether the food is WIC eligible, check the benefit balance throughout the month, and order groceries online.
  - [Increase](#) the WIC Cash Value Benefit (CVB) amounts permanently. The increased CVB amounts provided during the pandemic have been shown to increase fruit and vegetable intake and variety in WIC households with low incomes, from historically marginalized racial/ethnic groups, and in rural households.
- Supplemental Nutrition Assistance Program (SNAP)
  - [Consider](#) legislative changes to ensure that SNAP benefit calculations are based on the Low-Cost Food Plan or the Moderate-Cost Food Plan, rather than the Thrifty Food Plan. At a minimum, the Thrifty Food Plan should be adjusted to account for recent rises in inflation.
  - [Support](#) equitable expansion of the SNAP Online Purchasing Pilot through the newly announced [SNAP EBT Modernization Technical Assistance Center grant](#). High priority should be given to supporting non-chain, smaller, independent stores located in socially disadvantaged areas across the country. Additional infrastructure and services are needed to facilitate SNAP participant use of online ordering and delivery—such as subsidizing online purchasing and delivery fees and offering secure, refrigerated pick-up locations for delivery.
  - Expand eligibility for and increase participation in SNAP by [amending](#) the Food and Nutrition Act of 2008 (P.L. 88-525) to transition Puerto Rico, American Samoa, and the Commonwealth of the Northern Mariana Islands from the Nutrition Assistance Program (NAP) to SNAP and [allowing](#) participation in the Food Distribution Program on Indian Reservations (FDPIR) and SNAP in the same month.
- School Nutrition Programs
  - [Expand](#) universal free school meals through Community Eligibility Program (CEP) or national universal free school meal provisions as such policies have the potential to contribute to positive child health outcomes including school meal participation rates, improved diets, and attendance. With research also demonstrating that school meals are healthier than those brought from home, such policies could improve child obesity rates and diet quality for all children across the U.S.
  - [Expand](#) on-site Administrative Review to include specific check-points that ensure effective oversight of drinking water safety and access in school nutrition programs.

## **Integrate Nutrition and Health**

*Prioritizing the role of nutrition and food security in overall health is imperative for achieving long-term success in disease prevention and management. The recommendations listed below have the potential to ensure the U.S. healthcare system addresses the nutrition needs of all people through better alignment and integration with the U.S. social safety net.*

- Support the incorporation and implementation of a (validated) [beverage screener](#) into the Electronic Health Record (EHR) during well-child visits with primary care providers. Not only would this provide an opportunity to reduce unhealthy beverage intake in children, by initiating educational conversations between primary care providers and parents/caregivers about [healthy beverage consumption](#), but it would also result in new longitudinal databases of individual-level consumption that could enhance the ability to evaluate local or regional policies.
- [Align and streamline](#) enrollment processes for programs with similar eligibility requirements (e.g., WIC, SNAP, Medicaid, CHIP) serving young children and families, which can make it easier for families to learn about and access a variety of programs and services, thus increasing participation and reducing disparities.
- Develop a cross-agency research funding strategy to better understand how social and economic programs and policies related to poverty reduction - such as financial payments to families, income assistance programs, and housing assistance or housing security programs - impact child obesity, diet quality, food and nutrition security, and other relevant child and family health outcomes. Facilitating the linkage of datasets across various federal and state agencies will undoubtedly lead to research innovation that sheds light on important connections between these social determinants and health outcomes.
- Integrate evidence-based recommendations on promoting [healthy eating behaviors](#) and [beverage consumption](#) with young children into existing early intervention counseling provided by health care providers (Registered Dietitians, Pediatricians, Pediatric Dentists, etc.), WIC Nutrition Education Guidance by USDA, and home visiting programs operated via the Maternal and Child Health Bureau (HRSA) to ensure consistent messaging for parents and caregivers.

## **Empower All Consumers to Make and Have Access to Healthy Choices**

*The environments in which people live, learn, work, play, and worship determine an individual's ability to access healthy food and make informed healthy choices. The recommendations below are important steps towards creating healthy policies and systems changes that are culturally appropriate, will resonate with specific communities, and ensure that all Americans have the ability to make healthy, informed choices.*

- Supplemental Nutrition Assistance Program (SNAP)
  - [Incorporate](#) nutrition security and diet quality as core objectives of SNAP.
  - [Further attention](#) should be given to the pairing of incentives for healthy foods and beverages with disincentives or restrictions for less healthy items. One approach is for Congress to authorize USDA to approve state waiver requests and appropriate funds for the evaluation of the approved waivers.
  - [Emphasize](#) and promote opportunities for SNAP retailers to stock healthier items while also offering SNAP-authorized stores—particularly non-chain, smaller retailer venues in socially disadvantaged areas—incentives, capacity building, and

technical support to meet stronger stocking standards. In addition, the commercial marketing of foods and beverages that do not align with the latest Dietary Guidelines for Americans should be limited at SNAP-authorized stores.

- USDA should add a requirement that all states' SNAP-Ed programs include a [healthy beverage component](#) consisting both of education and of policy, systems and environmental change (PSE) strategies, all aimed both at reducing sugary drink intake and at enabling consumption of water (and preferably tap water).
- School Nutrition Programs
  - [Support](#) low-cost strategies that can be implemented at the district and school level to increase the consumption of healthy school meals. Examples of these strategies include holding recess before lunch, extending the length of the lunch period, and cutting fruits into slices rather than serving whole.
- Charitable Food System and USDA Food Distribution Programs
  - [Support](#) a standardized system of ranking the nutritional quality of foods entering the charitable food system—for example, via the USDA's Food Distribution Programs, including TEFAP, FDPIR, and CSFP. One option is to use the HER Nutrition Guidelines for the Charitable Food System that were developed by a panel of experts in the charitable food system, nutrition, and food policy fields to create clear, specific recommendations for evidence-based nutrition guidelines tailored to the unique needs and capacity of the charitable food system.
- MyPlate
  - Request USDA and HHS to take the necessary steps to [add a symbol for water](#) to the MyPlate graphic.
- Front of Pack Nutrition Labeling and Health/Nutrient Claims
  - [Restrict](#) the use of nutrient-related claims and [require](#) the use of warning labels on sugary drinks, which have been shown to reduce sugary drink purchases and inform consumers about the risks of sugary drinks. Research demonstrates that consumers are confused by the vast array of nutrient and health claims on the front of most food items. Re-evaluating the standards for front of pack nutrient/health claims and nutrition labeling is an important tool for assisting consumers in making healthy, informed decisions.

### **Enhance Nutrition and Food Security Research**

*Improving nutrition metrics, data collection, and research to inform nutrition and food security policy, particularly on issues of equity, access, and disparities is imperative to making forward progress in each of these areas. Healthy Eating Research has been a predominant funding entity in this space for the last 17 years, driving national and local nutrition and food security policy efforts with informed recommendations. The recommendations provided below are important for ensuring research continues to play a central role in the development of policy and systems changes designed to improve nutrition and food security for all Americans.*

- [Provide](#) funding for research to allow real-time assessment of emergency food assistance approaches implemented during the COVID-19 pandemic. Such funding would allow innovative approaches like the Pandemic Electronic Benefits Transfer Program (P-EBT) to be evaluated for effectiveness and enhanced or improved upon in the short and long-term,

including identifying which federal nutrition assistance waiver flexibilities should be codified for future state, tribal, territorial, and national emergencies.

- [Strengthen](#) national monitoring and surveillance systems. Most U.S. food security- and nutrition-relevant monitoring and surveillance systems do not include Native Americans, among other socially disadvantaged populations. When these groups are included, they are often categorized as “other,” given their relatively small sample size. More work remains to ensure our monitoring and surveillance systems are adequately supported to ensure Native Americans and other socially disadvantaged groups are visible in national data.
- [Better](#) leverage data and pilots using a human-centered design approach. Stronger investments in administrative data, pilot programs, and initiatives that aim to simplify and expand federal nutrition assistance program participation reach using an equity lens are needed. For example, pilots could be conducted to identify and scale up common enrollment platforms or integrated benefits applications across multiple safety net programs to promote participation and reduce participant burden. This work necessitates gathering input through public dialogue with SNAP participants and those eligible but not participating, particularly among socially disadvantaged populations and with an eye toward cultural inclusiveness.
- Develop a suite of training and technical assistance materials for researchers that include key principles for incorporating equity and/or health equity lens into research. This could include a [framework](#) to guide practitioners and researchers in public health and other fields working on nutrition and obesity prevention to place greater priority on equity issues when undertaking policy, systems, and environmental change strategies and related research. Healthy Eating Research has developed a [toolbox](#) for the HER network of researchers that can be referenced by USDA.

Thank you for providing the opportunity to present comments and recommendations to inform the national strategy that will be released at the White House Conference on Hunger, Nutrition, and Health. HER would be honored to serve as a resource to the Biden-Harris Administration throughout this process.

Regards,

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