

Attachment C-2

Rep. DeLauro Comment Received in Response to Federal Register Notice

From: [Jackson, Noah - OSEC, Washington, DC](#)
To: [Gualtieri, Marie](#); [Coleman-Jensen, Alisha - ERS](#)
Cc: [Ver Ploeg, Shelly - ERS](#); [Duvall, Zellie - OSEC, Washington, DC](#); [Jacobs, Zach - OSEC, Washington, DC](#)
Subject: RE: USDA Household Food Security Questionnaire
Date: Monday, March 9, 2020 2:17:38 PM

Marie— We are looking forward to connecting as well. A conflict actually came up on my end, so my colleague, Zach Jacobs, will be hosting the call. Let me know if you have any further questions!

Sincerely,

Noah Jackson



Legislative Analyst – Office of Congressional Relations

United States Department of Agriculture
Office: (202)205-9994
Cell: (202)731-9351

From: Gualtieri, Marie <Marie.Gualtieri@mail.house.gov>
Sent: Monday, March 9, 2020 11:51 AM
To: Jackson, Noah - OSEC, Washington, DC <Noah.Jackson@usda.gov>; Coleman-Jensen, Alisha - ERS <alisha.coleman-jensen@usda.gov>
Cc: Ver Ploeg, Shelly - ERS <michele.verploeg@usda.gov>
Subject: RE: USDA Household Food Security Questionnaire

Hi Noah,

Sounds great! Looking forward to connecting.

All the best,

Marie

From: Jackson, Noah - OSEC, Washington, DC <Noah.Jackson@usda.gov>
Sent: Friday, March 6, 2020 5:51 PM
To: Gualtieri, Marie <Marie.Gualtieri@mail.house.gov>; Coleman-Jensen, Alisha - ERS <alisha.coleman-jensen@usda.gov>
Cc: Ver Ploeg, Shelly - ERS <michele.verploeg@usda.gov>
Subject: RE: USDA Household Food Security Questionnaire

Marie— 9:30 on March 10th works on our end. You can call the following conference line: 888-844-9904, AC:5019864

Sincerely,



Noah Jackson

Legislative Analyst – Office of Congressional Relations

United States Department of Agriculture

Office: (202)205-9994

Cell: (202)731-9351

From: Gualtieri, Marie <Marie.Gualtieri@mail.house.gov>
Sent: Friday, March 6, 2020 3:35 PM
To: Coleman-Jensen, Alisha - ERS <alisha.coleman-jensen@usda.gov>
Cc: Jackson, Noah - OSEC, Washington, DC <Noah.Jackson@usda.gov>; Ver Ploeg, Shelly - ERS <michele.verploeg@usda.gov>
Subject: Re: USDA Household Food Security Questionnaire

Hi Alisha,

Thank you for your email! How about March 10th at 9:30am or 10am?

All the best,

Marie

From: Coleman-Jensen, Alisha - ERS <alisha.coleman-jensen@usda.gov>
Sent: Wednesday, March 4, 2020 4:31 PM
To: Gualtieri, Marie <Marie.Gualtieri@mail.house.gov>
Cc: Jackson, Noah - OSEC, Washington, DC <Noah.Jackson@usda.gov>; Ver Ploeg, Shelly - ERS <michele.verploeg@usda.gov>
Subject: RE: USDA Household Food Security Questionnaire

Hello Marie,

Thanks for your inquiry. I'd be happy to speak with you. Noah Jackson, from USDA Office of Congressional Relations, would like to join the call as well. We are both free next Tuesday (March 10) before 1 pm, or anytime on Wednesday (March 11). Do you have time for a phone call either of those days?

If you have specific questions you'd like me to address, it would be helpful to see them in advance.

Thank you,
Alisha

From: Gualtieri, Marie [<mailto:Marie.Gualtieri@mail.house.gov>]
Sent: Wednesday, March 4, 2020 11:21 AM
To: Coleman-Jensen, Alisha - ERS <alisha.coleman-jensen@usda.gov>
Subject: USDA Household Food Security Questionnaire

Hi Alisha,

I hope this email finds you well. My name is Marie Gualtieri, I recently finished my PhD focusing on food access among older adults. I am currently a Health and Aging Policy Fellow for Rep. Rosa DeLauro. I wanted to reach out to see if you had time for a phone chat about the USDA Household Food Security Questionnaire. Let me know your availability!

All the best,

Marie

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Marie C. Gualtieri, PhD
2019-2020 Health and Aging Policy Fellow
American Political Science Association Congressional Fellow

Rep. Rosa L. DeLauro (CT-03)
2413 Rayburn House Office Building
Washington, DC 20515
Delauro.house.gov

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From: [Marie Gualtieri](#)
To: [Coleman-Jensen, Alisha - ERS](#)
Cc: [Marie Gualtieri](#)
Subject: Re: FW: DeLauro: Notice of Intent To Request Revision of the Current Population Survey Food Security Supplement-A Currently Approved Information Collection
Date: Monday, March 23, 2020 9:26:36 PM
Attachments: [DeLauro- USDA ERS.pdf](#)

Hi Alisha,

Thank you for reaching out! I hope all is well with you during these times. Yes, it looks like some portion got cut off from the margins. Attached is the letter with no cutoff. Thank you again for reaching out.

Take care, and be well,

Marie Gualtieri

--

Marie C. Gualtieri, PhD

2019-2020 Health and Aging Policy Fellow

American Political Science Association Congressional Fellow

www.healthandagingpolicy.org

On Mon, Mar 23, 2020 at 8:55 PM Coleman-Jensen, Alisha - ERS <alisha.coleman-jensen@usda.gov> wrote:

Hi Marie,

I hope you are well. I wanted to check back with you to make sure that we received your complete letter. The attached has 2 pages but there may be a page missing or a sentence got cut off from page 1 to page 2?

Thanks,

Alisha

From: Marie Gualtieri <mariegphd@gmail.com>

Sent: Wednesday, March 11, 2020 5:04 PM

To: Coleman-Jensen, Alisha - ERS <alisha.coleman-jensen@usda.gov>

Cc: marie.gualtieri@mail.house.gov

Subject: DeLauro: Notice of Intent To Request Revision of the Current Population Survey Food Security Supplement-A Currently Approved Information Collection

Hi Alisha,

I hope this email finds you well. Please find attached the letter of comment from Congresswoman Rosa L. DeLauro, re: Notice of Intent To Request Revision of the Current Population Survey Food Security Supplement-A Currently Approved Information Collection.

It has been submitted online, as well. Confirmation #: [1k4-9fhw-7d7s](#).

All the best,

Marie Gualtieri

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Marie C. Gualtieri, PhD

2019-2020 Health and Aging Policy Fellow

American Political Science Association Congressional Fellow

www.healthandagingpolicy.org

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UNITED STATES
HOUSE OF REPRESENTATIVES

ROSA L. DELAURO
3RD DISTRICT, CONNECTICUT

CO-CHAIR, DEMOCRATIC STEERING AND
POLICY COMMITTEE

COMMITTEE ON APPROPRIATIONS

SUBCOMMITTEES
CHAIR

LABOR, HEALTH AND HUMAN SERVICES,
EDUCATION, AND RELATED AGENCIES

AGRICULTURE, RURAL DEVELOPMENT,
FOOD AND DRUG ADMINISTRATION,
AND RELATED AGENCIES

COMMITTEE ON THE BUDGET

March 11, 2020

Alisha Coleman-Jensen
Food Assistance Branch, Food Economics Division
Economic Research Service
Room 5-229B
1400 Independence Ave. SW
Mail Stop 1800
Washington, DC 20050-1800

RE: Notice of Intent to Request Revision of the Current Population Survey Food Security Supplement-A Currently Approved Information Collection

ERS Document Citation: 85 FR 7529

Dear Ms. Coleman-Jensen:

I write to you regarding the Current Population Survey Food Security Supplement, published on February 10, 2020 (ERS Document Citation: 85 FR 7529). As a Member of Congress, I have a strong interest in ensuring that the questions in this survey do as intended, which is to access the prevalence of food security and severity of food insecurity in households across the country.

However, for a specific subpopulation of respondents, older adults, this questionnaire falls incredibly short in accessing the severity and sole drivers of food insecurity. In the current survey, all the questions discuss food-related hardships as relates to income. Yet, research shows that income is not the sole driver to food insecurity for older adults; other issues include the lack of physical mobility, transportation, and social support.

From 1997-2003, the USDA entered into a cooperative agreement with a group of statisticians and economists at Iowa State University to conduct research designed to strengthen and improve the measurement of food security and hunger. These evaluators noted that “While an overall measure of food insecurity, valid for the whole U.S. population, would be desirable, it is likely that such a measure would underestimate hunger and food insecurity for certain subgroups, especially for children and elderly adults.” Yet, nothing was done to address this issue.

The problem extends farther than the survey itself. Many community-based nutrition organizations use this questionnaire to determine need among potential clients. These clients are then given a score based on their responses, with their overall score determining if they receive services. If income is not an issue for them, but mobility and transportation are, then the case manager will never learn of those issues, and older adults could be turned away. Due to a lack of

funding, some clients are placed on a waiting list (some communities have 12,000 people waiting for home-delivered meals). Their position on the waiting list is often determined by the score they receive on the survey. Ultimately, potential clients can be placed lower in priority when they could be in dire need.

A solution to this issue is adding supplemental questions to the questionnaire that are administered if an adult is 60 years of age or older. These supplemental questions would include other drivers of food insecurity for older adults, such as transportation, physical mobility, and social support. There is a precedence for this: currently, if a household includes a child under the age of 18, then the respondent is asked an additional eight questions.

During the time of solidifying the original questions, the population was young. In fact, the oldest Baby Boomer was 48 years old. But now, the population is overwhelmingly aging. Now is the time to address this issue. By 2030, all Baby Boomers will be 65 years old and older. By 2035, there will be more older adults than there are children under the age of 18, and the number of older adults with four or more chronic diseases will double.

If food insecurity is not being properly determined, then older adults cannot get the resources that they need and have higher medical costs as a result. In fact, 1 in 6 older adults in America faces the threat of hunger and not being properly nourished. AARP reports that seniors face a healthcare bill of more than \$130 billion every year due to medical issues stemming from senior hunger.

Sincerely,

A handwritten signature in black ink that reads "Rosa L. DeLauro". The signature is written in a cursive style with a large initial "R".

Rosa L. DeLauro
Member of Congress

From: [Ver Ploeg, Shelly - ERS](#)
To: [Coleman-Jensen, Alisha - ERS](#); [Marie Gualtieri](#); marie.gualtieri@mail.house.gov
Cc: [Jackson, Noah - OSEC, Washington, DC](#); [Weinberg, Marca - ERS](#); [Variyam, Jay - ERS](#)
Subject: RE: DeLauro: Notice of Intent To Request Revision of the Current Population Survey Food Security Supplement-A Currently Approved Information Collection
Date: Thursday, March 26, 2020 5:01:54 PM
Attachments: [Response to DeLauro food security 03262020.pdf](#)

Marie,

On behalf of ERS Administrator Marca Weinberg, attached please find a detailed response to Rep. DeLauro's insightful comments. We will also submit this response through the formal Federal Register process with responses to comments from others.

Alisha and the rest of the food security research team would be happy to further discuss food security measurement, data and research if it would be helpful.

Thank
you!

Shelly

Shelly Ver Ploeg
Acting Assistant Administrator
Economic Research Service
U.S. Department of Agriculture
355 E Street, SW 5-232
Washington, DC 20024-3221

Phone: (202) 694-5372
Cell Phone: (202)503-5253
michele.verploeg@usda.gov

From: Coleman-Jensen, Alisha - ERS
Sent: Monday, March 23, 2020 8:55 PM
To: Marie Gualtieri <mariegphd@gmail.com>; marie.gualtieri@mail.house.gov
Cc: Ver Ploeg, Shelly - ERS <michele.verploeg@usda.gov>; Jackson, Noah - OSEC, Washington, DC <Noah.Jackson@usda.gov>
Subject: FW: DeLauro: Notice of Intent To Request Revision of the Current Population Survey Food Security Supplement-A Currently Approved Information Collection

Hi Marie,

I hope you are well. I wanted to check back with you to make sure that we received your complete letter. The attached has 2 pages but there may be a page missing or a sentence got cut off from page 1 to page 2?

Thanks,
Alisha

From: Marie Gualtieri <mariegphd@gmail.com>
Sent: Wednesday, March 11, 2020 5:04 PM
To: Coleman-Jensen, Alisha - ERS <alisha.coleman-jensen@usda.gov>
Cc: marie.gualtieri@mail.house.gov
Subject: DeLauro: Notice of Intent To Request Revision of the Current Population Survey Food Security Supplement-A Currently Approved Information Collection

Hi Alisha,

I hope this email finds you well. Please find attached the letter of comment from Congresswoman Rosa L. DeLauro, re: Notice of Intent To Request Revision of the Current Population Survey Food Security Supplement-A Currently Approved Information Collection.

It has been submitted online, as well. Confirmation #: [1k4-9fhw-7d7s](#).

All the best,

Marie Gualtieri

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Marie C. Gualtieri, PhD

2019-2020 Health and Aging Policy Fellow

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March 26, 2020

The Honorable Rosa L. DeLauro
United States House of Representatives
2413 Rayburn House Office Building
Washington, DC 20515-0703

Dear Congresswoman DeLauro:

Thank you for submitting a comment letter in response to the Federal Register Notice of Intent to Request Revision of the Current Population Survey Food Security Supplement-A Currently Approved Information Collection. We appreciate your interest in ensuring USDA's food security survey module measures food security appropriately for all subpopulations in the U.S.

You raise several points in your letter to which ERS is glad to respond. First, and most importantly, USDA's food security survey module only measures food-related hardship when that hardship is related to income, or limited resources, as you say in your letter. This was the intent and design of the original, and now official, USDA measure of food security. The special needs of subpopulations such as the elderly or non-income factors such as a lack of physical mobility, transportation, or social support are certainly important and are not explicitly captured by the current measure of food security. We would welcome research and analysis that could be used to carefully develop and test an additional measure(s) of food hardship that is rooted in non-income factors. But adding these non-income factors to the well-tested and accepted current approach in the current official USDA measure could jeopardize its statistical integrity.

The current food security measure was designed based on in-depth research conducted jointly by the USDA, the Department of Health and Human Services, and non-government research organizations and incorporates important insights from the field of measurement theory. If food-related hardships that are unrelated to income were to be added into the official USDA measure, the measure and its underlying statistical model would mix monetary and non-monetary hardships. Such mixing could potentially diminish the usefulness and effectiveness of the USDA measure for capturing income or resource-limited food hardships. This issue was discussed in early technical reports on food security measurement. The *Guide to Measuring Household Food Security: Revised 2000* (available at: <https://fns-prod.azureedge.net/sites/default/files/FSGuide.pdf>) acknowledges that "other possible sources of household food insecurity apart from financial constraint, such as reduced mobility or function for isolated elderly or ill persons, are not captured by the measure" (Bickel et al., 2000, p. 9). Initially, the conceptual definition of food insecurity included acquiring foods in socially acceptable ways and included questions about coping behaviors. But these questions did not meet the statistical criteria for inclusion in the food security measurement scale (see Chapters 4 and 5 in *Household Food Security in the United States in 1995: Technical Report of the Food Security Measurement Project*, available at: https://fns-prod.azureedge.net/sites/default/files/TECH_RPT.PDF). That key statistical point is not a criticism of the goal of enhancing the measurement of food hardship among the elderly, but

instead suggests that developing a separate food-hardship measure may potentially be a better means of achieving that goal.

It is also important to note two related subpoints:

- First, some of the non-resource constraints may already be reflected in the existing food security items. For example, physical immobility and transportation barriers may result in food insecurity if the elderly do not have the resources to overcome those barriers (e.g., paying for grocery delivery or paying someone else to obtain groceries for them).
- Second, it can be helpful for both research and policy purposes to distinguish between the *measure* of food insecurity and the *determinants* of food insecurity. While mobility, transportation, and social support, for example, are not included in the measure of food insecurity, they can singly or collectively be important factors that *cause* food insecurity. Studies conducted by ERS and others have shown food insecurity is associated with many factors besides income—including disability and mobility limitations, exactly as your letter identified. A 2013 ERS report was influential in identifying disabilities as an important risk factor for food insecurity, focusing on working-age adults, *Food Insecurity among Households with Working-Age Adults with Disabilities* (available at: <https://www.ers.usda.gov/publications/pub-details/?pubid=45040>). A follow-up study published in *Journal of Disability Policy Studies* in 2017 titled “Food Insecurity Across the Adult Life Span for Persons with Disabilities” examined food insecurity among older adults as well. That study was summarized in an ERS *Amber Waves* magazine article and can be found here: <https://www.ers.usda.gov/amber-waves/2017/september/adults-with-disabilities-especially-mental-health-disabilities-are-at-a-higher-risk-for-food-insecurity/>. We found older adults with mental health disabilities faced particularly high likelihood of food insecurity. ERS continues to conduct research in this area to better understand the causes of (resource-limited) food insecurity.
- Third, you may be aware that we do include statistics on food insecurity among the elderly in our annual food security report, *Household Food Security in the United States* (available here: <https://www.ers.usda.gov/publications/pub-details/?pubid=94848>). In 2018, 7.5 percent of households that included an elderly adult were food insecure. Among elderly living alone, 8.9 percent were food insecure in 2018. Nationally, 11.1 percent of U.S. households were food insecure in 2018. We also provide interactive data visualizations on our website. One of these examines food insecurity among households that include adults with disabilities, separating adults age 18-64 and adults age 65 plus. You can find that data visualization here: <https://www.ers.usda.gov/topics/food-nutrition-assistance/food-security-in-the-us/interactive-charts-and-highlights/#disability>.

Your letter mentions concerns raised in “Statistical Considerations for the USDA Food Insecurity Index,” a working paper from Iowa State published in 2002 (available at: <https://www.card.iastate.edu/products/publications/pdf/02wp307.pdf>). A follow-up ERS study was conducted in response to these concerns, which had been raised in earlier work as well. That research focused on how the elderly “interpret” and “respond to” questions on the food security survey module and on their overall response patterns, in comparison with non-elderly. The ERS study was published in 2003 and concluded that there was no indication that the food security scale “underreports” the prevalence of (resource-limited) food insecurity among the elderly. It

explicitly considered, and confirmed, that non-monetary factors do affect the elderly, but also provided an important caveat:

Results of the scaling analysis allay concerns that the standard scale underreports the prevalence of food insecurity and hunger among the elderly because of differences in how they interpret and respond to the questions in the Food Security Survey Module ... Responses to the food sufficiency question indicate that the elderly do face food-access problems other than insufficient resources to buy food—most notably problems getting to a store. However, these problems are no more likely for elderly than nonelderly households to be so serious as to disrupt desired eating patterns or result in having insufficient food to eat. (Nord, 2003, p.44)

Nord, M., 2003, "Measuring the Food Security of Elderly Persons," *Family Economics and Nutrition Review* 15 (1), USDA, Center for Policy and Promotion, available at: https://fns-prod.azureedge.net/sites/default/files/archived_projects/fenrv15n1.pdf

We agree it is important to understand the full range of barriers faced by clients of community-based nutrition organizations, including multi-layered barriers to obtaining a nutritious diet in addition to limited income. ERS would be happy to explore these issues further in partnership with community-based nutrition organizations. Community-based nutrition organizations and their clients could potentially benefit from new survey questions meant to assess other aspects of food access and barriers to obtaining adequate, nutritious food. We recognize the importance of that work and would be eager to help develop it. Relatedly, ERS supported a pioneering two-volume study, now somewhat dated, of the emergency food assistance system in the United States (available at <https://www.ers.usda.gov/publications/pub-details/?pubid=46496>). However, such work is not directly related to the annual measurement of U.S. food insecurity for the country as a whole or the Federal Register Notice regarding the Food Security Supplement test.

As you note there are eight items about children's food insecurity that are asked of households with children. These eight questions all stipulate a resource limitation as the reason for food hardships among children. Asking similar questions for the elderly would only address food hardship due to limited resources. However, in recent years ERS has expanded our ability to investigate mobility and health factors related to food insecurity with other data sources. Beginning in 2011, USDA began funding the inclusion of the 10-item Adult Food Security Survey Module in the National Health Interview Survey (NHIS). Data development has expanded research that links food insecurity and physical health impairments. It also enables research linking disease management, such as medication adherence, medical expenditure, and food insecurity.

We agree with your concern that food insecurity and food access among the elderly is of growing importance with our aging population. ERS staff have conducted research on questions related to food insecurity among the elderly, including a 2015 journal article titled "Food Insecurity and Health Outcomes among Older Adults: The Role of Cost-Related Medication Underuse" (available at: <https://doi.org/10.1080/21551197.2015.1054575>), and a 2019 article titled "Food Deserts and Diet-Related Health Outcomes of the Elderly" (available at: <https://doi.org/10.1016/j.foodpol.2019.101747>). USDA has also demonstrated our recognition of its importance with research investments on this topic. For example, USDA's Food and Nutrition Service and ERS have partnered with University of Kentucky's Center for Poverty Research to fund two separate rounds of research studies on "Understanding Food-Related Hardships Among

Older Americans”. Summaries of the first round of studies are available at:
<http://ukcpr.org/research/food-assistance-food-insecurity/seniors>.

To summarize, the current food security measure was intentionally designed as a resource-limited measure. We understand there are other non-resource factors affecting access to nutritious food among the elderly (and others) and welcome further research and discussions on those factors and how to measure them. But it would be technically unsound to mix resource-limited factors and non-resource-limited factors in the current measure of food insecurity.

We thank you for your careful and thoughtful response to our Federal Register Notice and for your interest in ensuring all seniors have access to adequate, nutritious food. We would welcome the opportunity to discuss any of these issues further with you or members of your staff.

Sincerely,

Marca Weinberg

Marca Weinberg, Ph.D.
Administrator (Acting)
Economic Research Service, USDA
Email: marca.weinberg@usda.gov
Phone: (202) 694-5478