

Attachment C-2

**Public Comment (Carter) Received in Response to Federal Register
Notice**

From: [Coleman-Jensen, Alisha - REE-ERS, Washington, DC](#)
To: [John Mark Carter](#)
Subject: RE: [External Email]Re: ERS food security survey comments
Date: Wednesday, October 6, 2021 9:07:00 AM
Attachments: [Attachment D Cognitive Testing Recommendations.pdf](#)

Dear Dr. John Mark Carter,

Thank you for providing feedback on the food security survey. We will take your comments into consideration. As you note, the concepts of food security and nutrition security are distinct. The items and questions in the food security survey form a validated measure of food security. There is not a validated measure of nutrition security to use in the survey.

With regard to your concern about cultural bias, we have conducted research to examine differential item functioning across subpopulation groups and have not found a cause for concern with the data. See, for example: <https://www.ers.usda.gov/publications/pub-details/?pubid=47606> and <https://content.iospress.com/articles/journal-of-economic-and-social-measurement/jem443> We also recently contracted with the Census Bureau to conduct cognitive interviewing of the food security survey. They recruited respondents from various subgroups (see attached).

Thank you,
Alisha

From: John Mark Carter <geneva.fl@gmail.com>
Sent: Wednesday, September 29, 2021 9:50 AM
To: Coleman-Jensen, Alisha - REE-ERS, Washington, DC <alisha.coleman-jensen@usda.gov>
Subject: [External Email]Re: ERS food security survey comments

[External Email]

If this message comes from an **unexpected sender** or references a **vague/unexpected topic**;
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Please send any concerns or suspicious messages to: Spam.Abuse@usda.gov

Oh. I just realized you might take this feedback more seriously if I included my name and contact info:

Dr. John Mark Carter
6430 Blarney Stone Ct
Springfield, VA 22152
925-596-4128

On Wed, Sep 29, 2021 at 9:04 AM John Mark Carter <geneva.fl@gmail.com> wrote:

Thank you for the opportunity to provide suggestions regarding USDA ERS ongoing food security survey.

ERS data comprise the standard used by HHS and USDA for measuring food security in the US. They form the basis for federal agencies to set food policy. Unfortunately, rather than focusing on nutritional security, current ERS surveys report economic security. Almost all questions ask whether the respondent had enough money for food, not whether they had enough food. Intentionally conflating economic security with food security is a dangerously simplistic strategy. For experts to study and address differences between poverty and hunger we need data that measure these two factors without entanglement.

The other major shortcoming in current ERS food security surveys is cultural bias. By asking respondents to report on their level of anxiety ERS again provides data that are only indirectly related to what we need to measure. Some cultures reward complaining about suffering and injustice, while others discourage it. Thus respondents from different cultures who are experiencing the same level of nutritional insecurity will report different levels of worry. For experts to use your data to explore cultural differences in actual hunger, we need data that avoid cultural bias.