CENTER FOR Science IN THE Public Interest
Your Food and Health Watchdog

April 8th, 2026

Economic Research Service
1400 Independence Avenue SW
Mail Stop 1800
Washington, DC 20250-1800
Attention: Nisha Murray

RE: Request for Information on Opportunities, Challenges, and Emerging Areas in Statistical Data, Analysis, and Research at the U.S. Department of Agriculture (Docket No: ERS-2026-0001)

Dear Ms. Murray:

On behalf of the Center for Science in the Public Interest (CSPI), please accept these comments on the United States Department of Agriculture's (USDA's) Request for Information on Opportunities, Challenges, and Emerging Areas in Statistical Data, Analysis, and Research at the U.S. Department of Agriculture.

CSPI is a non-profit consumer education and advocacy organization that has worked since 1971 to improve the public's health through better nutrition and food safety. CSPI helped to lead efforts to win passage of the Nutrition Labeling and Education Act, the Healthy, Hunger-Free Kids Act, the Food Safety Modernization Act, chain restaurant menu labeling, and the Food Allergen Labeling and Consumer Protection Act. CSPI also publishes Nutrition Action (NA) and is supported by the subscribers to NA, individual donors, and foundation grants. CSPI is an independent organization that does not accept any corporate donations. CSPI is committed to advancing evidence-based policies and programs that improve healthy food access and nutrition security.

This comment responds to Questions 1 and 3-7 in the USDA Request for Information regarding Economic Research Service (ERS), National Agricultural Statistics Service (NASS), and Office of the Chief Economist's World Agricultural Outlook Board (OCE-WAOB) statistical and research products.[1]

Response to Question 1- Which NASS or ERS data (*e.g.*, releases, reports, datasets) are most valuable to your work, and why?

On September 20, 2025, USDA announced the discontinuation of the annual interagency agreement with the Census Bureau for the Food Security Supplement to the Current Population Survey (CPS-FSS), eliminating data collection that has occurred annually since 1995 and that supports ERS's widely cited Household Food Security in the United States report series.[2] USDA stated that the studies were "redundant, costly, politicized, and extraneous."[3] CSPI objects to the termination of this interagency agreement and the annual Food Security Reports, and rejects USDA's characterization of the report, which has provided vital information on hunger and food insecurity in the U.S. for nearly 30 years, and has no comparable replacement at the federal or

state level.[4] The most recent ERS report, *Household Food Security in the United States in 2024*, indicated that 86.3% of U.S. households were food secure throughout the entire year in 2024, while 13.7% experienced food insecurity at some point during the year, including 5.4% of households experienced very low food security.[5] Without ERS's continued sponsorship of the CPS-FSS, the data will not be collected, and the nation will lose access to the premier federal dataset for understanding food hardship and evaluating nutrition policy in the United States.[6]

The CPS-FSS provides several methodological advantages that no other federal dataset replicates:[7,8]

- Thirty years of continuous time series data, enabling long-term trend analysis
- Large nationally representative sample sizes, allowing statistically reliable estimates
- State-level identifiers, enabling geographic analysis and policy evaluation
- The full 18-item Household Food Security Survey Module (HFSSM), which measures the severity of food insecurity
- Detailed contextual variables, including food expenditures, minimum necessary food spending, and participation in public benefit programs

The HFSSM was developed through extensive research and validation by a federal interagency working group and collaborators in academia and the private sector.[9] The module is widely recognized as the gold standard for measuring food insecurity in the United States.[10] Because the CPS-FSS includes the full 18-item module and large annual samples, it enables robust national and state-level estimates that are not possible with other datasets.

In addition to these longstanding research efforts on food security, ERS produces several complementary data products that provide critical insights into food access and purchasing behavior. The Food Environment Atlas and the National Household Food Acquisition and Purchase Survey (FoodAPS and FoodAPS-2) are two key examples that offer unique, policy-relevant insights into the U.S. food system.[11] Food Environment Atlas allows researchers and policymakers to identify areas with limited access to affordable and nutritious foods and to target investments in food retail, transportation, and nutrition assistance programs accordingly. FoodAPS uniquely links household food purchases to income, program participation, and diet, enabling rigorous evaluation of how SNAP and other programs influence purchasing behavior and diet quality.

ERS data products, including the CPS-FSS, Food Environment Atlas, FoodAPS, and FoodAPS-2, provide an essential, science-based foundation for understanding food access, purchasing behavior, and program impact. These datasets must be preserved and strengthened to ensure that public health and nutrition policies remain informed by high-quality, nationally representative data.

Response to Question 3- What new topic areas should USDA prioritize for data products?

USDA should prioritize strengthening national food security surveillance rather than reducing it. Reliable federal statistics are essential for informing policy decisions, evaluating economic

conditions, and ensuring accountability in federal programs. The CPS-FSS is one of the most important datasets for understanding economic hardship and food access in the United States.

Maintaining this dataset is consistent with federal statistical policy. Under the Foundations for Evidence-Based Policymaking Act of 2018 and the Office of Management and Budget's Statistical Policy Directives, federal statistical agencies are required to produce data that are objective, credible, timely, and relevant to policy evaluation.[12, 13] The CPS-FSS meets these standards and plays a critical role in ensuring the integrity of national food security measurement.

In addition to maintaining the CPS-FSS, priority research areas include:

- Analysis of food insecurity among rural populations, older adults, and households with disabilities
- Research on the relationship between food insecurity, health outcomes, housing instability, and economic hardship
- Evaluation of federal nutrition programs, including SNAP, and their impact on household food security
- Analysis of food insecurity among rural populations, older adults, households with disabilities, communities of color, and the LGBTQI+ community

Surveys that include food security questions alongside health, housing, or education variables are complementary rather than duplicative. These data allow researchers to examine how food access interacts with broader social and economic conditions. However, these surveys cannot replace the CPS-FSS, which serves as the national benchmark dataset for food insecurity prevalence.

In addition to maintaining robust food security surveillance, USDA should prioritize the development of standardized approaches to measuring nutrition security. According to USDA, nutrition security means that all Americans have consistent and equitable access to healthy, safe, affordable foods essential to optimal health and well-being.[14] While existing data systems provide critical information on food access and economic hardship, important gaps remain in understanding whether households can consistently access not just enough food but nutritious food that supports health and prevents chronic disease.

The Economic Research Service should establish an interagency working group with the Food and Nutrition Service and Centers for Disease Control and Prevention's National Center for Health Statistics to develop a standard mechanism and instrument(s) for measuring nutrition security, along with methods for applying these measures in research at the national, state, and local levels. This effort should be collaborative across federal agencies and include academic and private-sector research experts as contributors and reviewers. The working group should adhere to regular public reporting requirements to ensure transparency, scientific rigor, and accountability.

Establishing nutrition security measurements and reporting will better equip policymakers, researchers, and public health practitioners to design and evaluate interventions that improve diet quality, reduce disparities, and prevent diet-related disease, an administration priority.[15]

Response to Question 4- How often should data and information be released or updated (*e.g.*, annually, quarterly)?

ERS should continue to sponsor the CPS-FSS, collecting household food security estimates annually, and continue to analyze and publish the data in the annual Household Food Security Reports to provide food security statistics at the national level, for critical subpopulations, and for regions and states, as well statistics on food spending and use of federal nutrition assistance programs by food-insecure households. USDA ERS should also establish a parallel commitment to issue annual, publicly available data on nutrition security as measurement approaches are developed.

Annual data collection allows policymakers and researchers to:

- Monitor trends in food and nutrition insecurity
- Detect emerging hardship during economic disruptions
- Evaluate the impact of policy changes
- Assess whether federal programs are improving both food access and diet quality

Infrequent or irregular surveys cannot provide the timely monitoring required for effective policy evaluation.

Response to Question 5- What geographic granularity (*e.g.*, national, state, country) best supports your work?

State-level data are essential for understanding geographic disparities in food insecurity and informing policy decisions at the state and local levels. The CPS-FSS is uniquely capable of producing reliable state-level estimates, which are analyzed and reported in ERS Household Food Security Reports, allowing policymakers to evaluate regional differences and target interventions. Many alternative datasets lack public state identifiers or have sample sizes too small to produce reliable state-level estimates.

Response to Question 6- Are there NASS or ERS data products, data sets, and other relevant information that are duplicative, outdated, or underutilized? What improvements, changes or consolidations could be made (*e.g.*, more timely, different data collection methods)?

The ERS Household Food Security Reports and CPS-FSS are neither duplicative nor outdated, despite the USDA's characterization of the reports as "redundant" and "extraneous."[16,17] More broadly, ERS data products play a distinct and complementary role in the federal statistical system and should be preserved and strengthened, not reduced. One way they could be strengthened is by establishing additional annual data collection on nutrition security to provide a fuller picture of access to sufficient, nutritious food in the U.S.

Other federal surveys that have adopted some form of food security measurement are not adequate as described below:

- Exclude children (*e.g.*, the National Household Food Acquisition and Purchase Survey (USDA), the Medical Expenditure Panel Survey (Agency for Healthcare Research and Quality))
- Use shortened food security modules (*e.g.*, the American Housing Survey (Department of Housing and Urban Development), the Early Childhood Longitudinal Study Kindergarten and Birth Cohorts (National Center for Education Statistics), the Medical Expenditure Panel Survey (Agency for Healthcare Research and Quality), the Survey of Income and Program Participation (Census Bureau), National Survey of Children's Health (Census Bureau))
- Have significantly smaller sample sizes (*e.g.*, the National Health and Nutrition Examination Survey (National Center for Health Statistics), the Medical Expenditure Panel Survey (Agency for Healthcare Research and Quality), the Panel Study of Income Dynamics (USDA, University of Michigan Institute for Social Research))
- Lack geographic identifiers (*e.g.*, the National Health Interview Study (National Center for Health Statistics))
- Are not conducted annually (*e.g.*, the Medical Expenditure Panel Survey (Agency for Healthcare Research and Quality), the National Health Interview Study (National Center for Health Statistics), the Panel Study of Income Dynamics (USDA, University of Michigan Institute for Social Research), the Survey of Income and Program Participation (Census Bureau), the Early Childhood Longitudinal Study Kindergarten and Birth Cohorts (National Center for Education Statistics))
- Are no longer fielded (*e.g.*, Household Pulse Survey (Census Bureau), Survey of Program Dynamics (Census Bureau))

These limitations make the CPS-FSS irreplaceable for measuring the prevalence and severity of food insecurity nationally and at the state level.

The elimination of the CPS-FSS and ERS's annual Household Food Security Reports will create a significant gap in the federal government's ability to monitor food insecurity and limit USDA's ability to understand how food and nutrition assistance programs impact food security.

ERS data products such as the Food Environment Atlas, FoodAPS, and FoodAPS-2 also provide critical, policy-relevant insights that are not available from any other source. The Food Environment Atlas integrates geographic data on food access, food retail, transportation, and community characteristics, enabling analysis at the local level. No other federal dataset brings these indicators together in a single, accessible platform.

Similarly, FoodAPS and FoodAPS-2 are the only federal datasets that link detailed household food purchases with income, program participation, and dietary intake. While other datasets like the National Health and Nutrition Examination Survey (NHANES) may capture individual components such as diet, they do not connect these data in a way that allows for comprehensive

evaluation of how SNAP and other nutrition programs influence purchasing behavior and diet quality.

Together, these datasets, including the establishment of nutrition security data and reporting, form the backbone of the federal evidence base on food access, food purchasing, and nutrition that public health researchers and practitioners rely on. Eliminating or scaling back these data products would create significant information gaps and limit federal and state governments' ability to design, target, and evaluate effective public health and nutrition policies.

Response to Question 7- Do you use non-USDA data to supplement data elements or variables of interest that are missing from NASS or ERS products? If yes, please specify which data sets you supplement and why. Do you use non-USDA data as a proxy for data elements that are missing from NASS or ERS products? If yes, please specify why you are using non-USDA data in conjunction with USDA data.

Researchers frequently use non-USDA datasets to examine specific populations or policy contexts. For example, CSPI relies on the annual Food Security Reports to target critical investments in statewide policy campaigns aimed at expanding access to nutritious food in states with high levels of food insecurity. However, these datasets are typically used in combination with foundational USDA data products—such as the CPS-FSS, Food Environment Atlas, and FoodAPS—which serve as benchmark datasets for national monitoring and policy evaluation, rather than as substitutes. For example, the ERS's reporting of annual CPS-FSS data serves as the national benchmark for measuring food insecurity, enabling researchers to contextualize findings from other surveys.

Without the ERS's sponsorship and reporting of the annual CPS-FSS, policymakers, researchers, and public health practitioners would lose the ability to track trends over time, assess disparities across key populations and geographies, evaluate the impact of federal nutrition programs like SNAP and child nutrition programs, and respond effectively to economic shocks, public health emergencies, and policy changes. This would significantly weaken the federal government's capacity to design, target, and evaluate evidence-based interventions to reduce food insecurity.

Conclusion

The CPS-FSS is the nation's most reliable and comprehensive dataset for measuring food insecurity. No other federal survey provides the same combination of annual data collection, large sample sizes, state-level estimates, and a full household food security module capturing both adult and child experiences. Similarly, the Food Environment Atlas and FoodAPS datasets provide essential insights into food access, purchasing behavior, and the effectiveness of federal nutrition programs. Maintaining these datasets is essential to USDA's mission and consistent with federal statistical standards requiring accurate, objective, and policy-relevant data.

For these reasons, CSPI urges USDA to reinstate sponsorship of the CPS-FSS, continue data analysis and reporting in the annual ERS Food Security Reports, and preserve and invest in ERS data products like the Food Environment Atlas and FoodAPS. USDA should also commit to the development and reporting of nutrition security measures. Together, these efforts are critical to

advancing a modern, comprehensive federal data system that supports evidence-based policymaking to improve food and nutrition security nationwide.

We appreciate your consideration of these views.

Sincerely,

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