



American Society for Nutrition
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April 9, 2026

Nisha Murray
Economic Research Service
U.S. Department of Agriculture
1400 Independence Avenue SW
Mail Stop 1800
Washington, DC 20250-1800

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,

The American Society for Nutrition (ASN) appreciates the opportunity to provide input on the U.S. Department of Agriculture (USDA)'s statistical data, analysis, and research. Established in 1928, ASN is a not-for-profit organization dedicated to the mission of advancing the science, education, and practice of nutrition. ASN has more than 9,000 members around the world, working throughout government, clinical practice, academia, and industry, to conduct research to achieve the ASN vision of "A Healthier World Through Evidence-Based Nutrition." ASN members include USDA staff, as well as recipients of USDA research grants, USDA and Extension educators, and participants on USDA grant review panels. ASN is extremely appreciative of USDA's support for human nutrition research.

The statistical data, analysis, and research conducted and provided by USDA ERS are vital to nutrition researchers to better understand the food and nutrition behaviors of households, communities, schools, states, and American society broadly. Many of the statistical data, analysis, and research USDA ERS provides cannot be produced at any other federal agency or research institution, including authoritative, peer-reviewed, science-based evidence that forms the foundation of our federal nutrition policy and programs, such as dietary guidance, and allows for an improved understanding of the links between nutrition and health. Data generated from USDA research and research partnerships underpin a broad range of research objectives and provide a basis for important national policy activities.

ASN Responses to Select Questions from the Request for Information are Bolded Below

- Which USDA ERS data (e.g., releases, reports, datasets) are most valuable to your work, and why?

The cancellation of the Household Food Security Reports produced by ERS creates a significant gap in nutrition policy, programs, and research. These reports have long provided essential data for tracking population-wide food security trends in response to economic changes, monitoring progress toward federal Healthy People objectives, and evaluating U.S. food and nutrition programs. The data have deepened understanding of how food assistance programs perform, illuminated the duration and frequency of food insecurity, and identified elevated risks among less targeted groups, such as people with disability.¹

For more than two decades, the Food Security Supplement (FSS) in the Current Population Survey (CPS), conducted by the U.S. Census Bureau, has provided the data by ERS to publish the nation’s primary, nationally representative measure of food insecurity. It has been a key indicator of economic well-being, a tool for assessing the effectiveness of USDA nutrition programs, and a guide for directing resources to the communities most in need. Eliminating this data collection will sharply limit the nation’s ability to monitor changes in food insecurity under shifting economic and policy conditions. A substantial and growing body of research links food insecurity to poorer health outcomes, increased health care utilization, and higher medical costs. The FSS provides critical insight into geographic and demographic risk factors, enabling researchers, policymakers, and nonprofit organizations to identify vulnerable populations—from children in high-risk counties to older adults in need—and tailor interventions accordingly.

The measurement of food insecurity has bipartisan roots, originating in the Reagan Administration and formalized under President George H.W. Bush through the National Nutrition Monitoring and Related Research Act of 1990. Since then, the report has been issued annually without controversy and has played a vital role in informing research and supporting service delivery across public, nonprofit, and charitable sectors nationwide.

Other USDA ERS data are also essential for nutrition researchers, such as the Food Access Research Atlas, which has not released data beyond 2019, and the National Household Food Acquisition and Purchase Survey (FoodAPS), which has not collected data since 2012-13. Nutrition researchers also utilize the Eating and Health Module (EHM), a supplement to the American Time Use Survey; Food Availability (Per Capita) Data System (FADS); Food Consumption, Nutrient Intakes, and Diet Quality data; the Food Environment Atlas; Food-at-Home Monthly Area Prices (F-MAP); SNAP Policy Data Sets; State Fact Sheets; and more.

- What gaps exist in the agricultural data produced?
- What new topic areas should USDA prioritize for data products?

¹Guthrie J. 2026. Food Security Data and Measurement—A Vital Part of Nutrition Research, Education and Policy. *J Nutr Educ Behav*, 58, 2-3.

USDA ERS should develop a metric for measuring and regularly reporting on nutrition security, on parity with food security. A nutrition security measure could be used to monitor diet quality in a timely way that complements the more in-depth but less timely data available from the National Health and Nutrition Examination Survey (NHANES). Nutrition security is distinct from and complementary to food security and is also a necessary part of monitoring efforts to improve diet and health. Unlike food security, while USDA has released a working definition of nutrition security, there is no nationally agreed-upon standard for measuring and monitoring nutrition security.² Development of these measures should be done in an academically rigorous, transparent, and inclusive way. Formalizing a valid measure of nutrition security will allow researchers and practitioners to adequately assess barriers to having consistent access to foods that promote wellbeing. For instance, currently there are no metrics to assess equitable access, availability, and affordability of nutritious food (the working definition of nutrition security).

- How often should data and information be released or updated (e.g., annually, quarterly)?
- What geographic granularity (e.g., national, state, county) for data best supports your work?

National data on economic behaviors associated with eating patterns for consumers and food and nutrition assistance program recipients is incredibly important. However, information at the state and/or county of residence level (even if restricted) would be helpful given the heterogeneity in policies and other contextual factors that can affect individual health. Currently, researchers can make state level inferences or county level estimates with national data. Better and more timely state and county level data would benefit researchers and others, and support policy-relevant nutrition research.

- Are there 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)?

Comprehensive, up-to-date information on the food purchases and acquisitions of U.S. consumers, especially those participating in USDA food and nutrition assistance programs, is needed. USDA's National Household Food Acquisition and Purchase Survey (FoodAPS), conducted in 2012-13, provided the first national data on food acquisitions and purchases from all sources—grocery and supermarkets; restaurants and fast food/take out; school and day care; food pantries; farmers' markets, etc.—with information that included prices paid and nutritional quality.³ However, more than 10 years have passed and FoodAPS has not been updated. In addition, the Food Access Research Atlas, which provides food access

² Perez-Velazco X, Frongillo E, Guthrie J, Coleman-Jensen A, Ehmke M, Gregory C, Seligman HK. 2025. Monitoring Nutrition Security: Perspectives from a Workshop on Nutrition Security Measurement. *J Nutr*; 155, 2773-2778.

³ Mancino L, Guthrie J, Ver Ploeg M, Lin B-H. 2018. *Nutritional Quality of Foods Acquired by Americans: Findings from USDA's National Household Food Acquisition and Purchase Survey*. Economic Information Bulletin No. (EIB-188).

data on populations, has not released data beyond 2019. It is critical to continue such data collection on food environments to better address population nutrition and health needs. Given recent changes in federal dietary guidance and food program policies (such as state SNAP waivers to limit the types of foods that can be purchased with SNAP benefits), it is important to update national nutrition data on a regular, timely basis.

- Do you use non-USDA data to supplement data elements or variables of interest that are missing from 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 ERS products? If yes, please specify why you are using non-USDA data in conjunction with USDA data.
- How could ERS improve transparency about data sources, assumptions, or models used in data products?
- Which ERS research or analytical products (e.g., farm income, situation and outlook reports, ERS research reports, World Agricultural Supply and Demand Estimates (WASDE)) are most valuable to your work, and how do you use them?

Nutrition researchers find USDA ERS data from the Household Food Security Reports; Food Access Research Atlas; National Household Food Acquisition and Purchase Survey (FoodAPS); Eating and Health Module (EHM) supplement to the American Time Use Survey; Food Availability (Per Capita) Data System (FADS); Food Consumption, Nutrient Intakes, and Diet Quality; Food Environment Atlas; Food-at-Home Monthly Area Prices (F-MAP); SNAP Policy Data Sets; State Fact Sheets; and more to be essential for ongoing nutrition research projects that inform healthcare and policy setting, among other uses.

- What emerging policy or economic issues should be addressed in ERS economic analysis, outlook, and forecasts?

Some emerging policy or economic issues that should be addressed in ERS economic analysis of particular importance to food and nutrition research and policy are:

- **Health and economic impacts of state SNAP waivers allowing changes in SNAP benefit food purchase rules**
- **Changes in food purchase and intake patterns prompted by the 2025 Dietary Guidelines for Americans and emerging changes in food marketing and consumer behavior such as the new emphasis on limiting highly processed foods**
- **Health and economic impacts of forthcoming changes to national school meals prompted by the 2025 Dietary Guidelines for Americans**
- **Health and economic impacts of changes to Medicaid and food and nutrition assistance program eligibility and requirements within the One Big Beautiful Bill Act**
- When using ERS forecasts or research, are you more likely to use raw data files, written analysis, or both? If you use one product type more than another, why?
- How can ERS better tailor the content to your needs?

- How could ERS improve transparency of the data sources, assumptions, methodology, or models used in economic forecasts?
- How do you currently access ERS data (e.g., Quick Stats, website, Application Programming Interfaces)? What challenges do you face when accessing data or research? What improvements would you suggest?
- What tools or formats would improve usability of ERS products (e.g., dashboards, machine-readable files, visualizations, downloadable tables)?
- Are there groups (e.g., beginning farmers, small businesses) that face challenges using ERS data and analytical products? How can we improve access?
- USDA produces a number of products associated with outlook and research output intended to increase the digestibility or access to statistical and research products. How useful are these associated products? These include ERS products like the ERS Farm Income and Wealth Statistics, Agricultural Resource Management Survey (ARMS) data dissemination tool, Amber Waves or Charts of Note, WASDE data visualization, or other documents? What formats or presentation styles work best for your intended purpose?
- How do you assess the credibility and relevance of ERS data and analytical products compared to other providers (e.g., land-grant or private universities, commercial vendors)?
- Are there other data or analytical products or reports produced by other parts of USDA that you consider highly valuable, duplicative, or redundant? Are there any improvements that you would suggest to these data or analytical products or reports produced by other parts of USDA?

USDA's Agricultural Research Service (ARS) maintains FoodData Central, a comprehensive source of food composition data with multiple distinct data types, that is very valuable to the work of nutrition researchers. ARS also is responsible for What We Eat in America (WWEIA), the dietary intake component of NHANES, that provides essential data on food, beverages, and nutrient intakes of Americans. WWEIA data has been used for policymaking, including updates to the Nutrition Facts food label, Dietary Reference Intake development, and the Thrifty Food Plan. ARS also develops the USDA Food and Nutrient Database for Dietary Studies (FNDDS), an application database which converts food and beverage portions reported in WWEIA, NHANES into gram amounts and nutrient values; the Food Patterns Equivalents Database, for assessing WWEIA data in relation to the Dietary Guidelines for Americans; and the Food Intakes Converted to Retail Commodities Databases (FICRCD), which provide data for foods consumed in WWEIA at the retail commodity level. All of these databases are utilized extensively by nutrition researchers.

In addition, USDA's Food and Nutrition Service (FNS) maintains administrative data on its food and nutrition programs that are useful to nutrition researchers. FNS could enhance use of these data by making it more easily located on their website, providing more granular detail at the state and local level, and developing products that make the information more usable by researchers, state and local program managers, and policy staffers. USDA FNS could investigate redesign of collection and reporting of administrative data that would more easily link the data to other datasets of interest. For instance, USDA

could improve the ability to link its school nutrition data to education data, such as the U.S. Department of Education's Common Core of Data (CCD) database.

FNS also conducts surveys and studies on USDA food and nutrition programs such as the WIC Infant and Toddler Feeding Practices Studies and the School Meal Program Operations Studies. Many FNS datasets are underused by nutrition researchers in contrast to Department of Health and Human Services datasets such as NHANES. If FNS and ERS collaborated to make these datasets and guidance on their appropriate use (e.g., variable definitions, statistical issues such as survey weighting, etc.) more easily accessed and used by university-based researchers, this would increase their researcher use and offer more value to U.S. citizens.

- What is the best way for ERS to receive ongoing feedback on its data and analysis? Are there groups or forums we should engage with more regularly?

Thank you for considering the comments and information provided by ASN related to the statistical data, analysis, and research produced by the USDA Economic Research Service. Restoring the data collection and analysis to support the annual Household Food Security Reports will enable our nation to better understand the causes and consequences of food insecurity and help nutrition researchers and many others across the U.S. Please contact Sarah Ohlhorst, MS, RD, ASN Chief Science Policy Officer (240-428-3647; sohlhorst@nutrition.org) if ASN may provide additional information.

Sincerely,



Naïma Moustaid-Moussa, Ph.D.
2025-2026 President, American Society for Nutrition