



October 13, 2023

Food and Nutrition Service
United States Department of Agriculture
1320 Braddock Place
Alexandria, Virginia 22314

Dear Deputy Under Secretary Stacy Dean and Administrator Cindy Long:

On behalf of The Greater Boston Food Bank (GBFB) we write to thank you for the opportunity to comment on the proposed regulatory changes for food distribution programs and to share our expertise, experiences and ideas for how to strengthen such programs.

GBFB is the largest hunger relief organization in New England and among the largest food banks in the country. GBFB distributes around 100 million healthy meals annually through a network of nearly 600 partner agencies in 190 cities and towns across Eastern Massachusetts. Monthly, we are serving approximately 600,000 individuals, including vulnerable populations of seniors, veterans, college students, children, and families.

Many of the programs in the proposed Improving Access and Parity Proposed Rule will benefit from updates, such as modernizing eligibility standards and increasing opportunities for access. Lessons we have learned from the pandemic are reflected in the proposed changes and will enable these programs to thrive for years to come.

We also recognize that some of the proposals may present limitations to the efficient, effective and equitable administration and distribution of USDA foods. GBFB encourages USDA to consider the following when crafting the final rule:

TEFAP

- Implement a minimum income eligibility threshold of 185% of the federal poverty level; remove the proposal for a maximum income eligibility threshold, but if deemed necessary, increase the maximum threshold to at least 400% of the federal poverty level with opportunity for states to apply for higher thresholds.
- Disallow the requiring of address or identification to verify residency.

- Ensure confidentiality regulations are aligned with ongoing best practices utilized in current electronic intake platforms.
- Require states to publicly post their TEFAP state plans.
- Expand access to TEFAP in tribal communities and to historically underserved populations.

CSFP

- Increase the maximum income eligibility threshold to 185% of the federal poverty level, a minimum income eligibility threshold of 130% of the federal poverty level.
- Allow broad use of categorical eligibility to streamline eligibility.
- Allow for alternative methods of identity verification.
- Require states to publicly post their CSFP state plans.

USDA Foods in Disaster

- Allow for the simultaneous provision of the Disaster Supplemental Nutrition Assistance Program (D-SNAP) and USDA disaster foods.

Thank you for your continued commitment to ensuring USDA foods can best support people experiencing food insecurity across the country. We look forward to working with you to create food distribution programs that are accessible and equitable.

With great appreciation,



Catherine D'Amato
President and CEO
The Greater Boston Food Bank