

President Joseph R. Biden
The White House
1600 Pennsylvania Avenue, NW
Washington, D.C. 20500

July 15, 2022

RE: Recommendations for the White House Conference on Food, Nutrition, Hunger, and Health

Dear President Biden:

On behalf of SPUR, thank you for this opportunity to provide comments to inform the White House Conference on Hunger, Nutrition, and Health.

SPUR is a nonprofit public policy organization based in the San Francisco Bay Area. One of the top priorities of SPUR's Food & Agriculture program is to reduce the economic barriers to food access by making healthy food more affordable, which research has shown is one of the most powerful steps policymakers can take to reduce hunger.

Two of the White House Conference's organizing "pillars" also point to the importance of reducing economic barriers to food access: Pillar One – "improve food access and affordability" and Pillar Two – "integrate nutrition and health."¹

While there are many paths to making healthy food more affordable, we recommend the federal government support two strategies that we think have the most potential to make systemic change in food affordability. Both focus on increasing low-income individuals' purchasing power.

The first strategy is making healthy food incentives a permanent supplement to the Supplemental Nutrition Assistance Program (SNAP). The second strategy is making medically supportive food interventions – including medically tailored meals, medically supportive meals, medically tailored groceries, medically supportive groceries, produce prescriptions and food pharmacies – a covered benefit in Medicaid.

To support these two strategies, we recommend the following:

- 1. Congress and the US Department of Agriculture (USDA) should make healthy food incentives a permanent supplement to the Supplemental Nutrition Assistance Program (SNAP).**

Healthy food incentive programs, which provide low-income families enrolled in the SNAP program with matching dollars when they buy fruits and vegetables, make healthy food more affordable while also supporting farmers and grocers. Numerous organizations, including SPUR, have piloted these

¹ White House Conference on Hunger, Nutrition, and Health: <https://health.gov/our-work/nutrition-physical-activity/white-house-conference-hunger-nutrition-and-health/conference-details> (accessed July 2022)

initiatives, also commonly known as supplemental benefit programs, at grocery stores and farmers' markets across the country. Evaluations from these programs show that they reduce hunger, improve health, and boost the agricultural economy.²

Given the positive impacts of these initiatives, the administration has the opportunity to improve millions of Americans' lives by transitioning healthy food incentives from pilot projects to permanent programs. One near-term step in making that happen is expanding the funding in the Farm Bill's Gus Schumacher Nutrition Incentive Program (GusNIP) to include an additional tier – and a complementary increase of funding -- for states ready to scale up their healthy food incentive programs, so that they can reach far more SNAP participants. States ready for this broad expansion would demonstrate their readiness to scale statewide either by integrating incentive programs into their existing electronic benefit transfer (EBT) system or through other technologies that have very high levels of administrative efficiency.

California has already committed to EBT integration, building on the precedent set by Massachusetts, in partnership with USDA in the Healthy Incentives Pilot from 2011-2012. In 2018, California's legislature and Governor approved a bill, co-sponsored by SPUR and Nourish California, directing the California Department of Social Services to pilot an integration of incentives into the state's EBT system with partner retailers and farmers' markets. The legislature also allocated \$9 million in state budget funds for this project, which is currently in implementation.³ Other states are also in the process of integrating incentives into their EBT systems, including Washington and Rhode Island. As more and more states adopt technologies that allow incentives to reach millions of SNAP participants, the only remaining obstacle to reaching that scale is funding. The 2023 Farm Bill is the key to addressing that funding gap so that states can demonstrate how incentives can be made broadly available at grocery stores and farmers markets statewide, having great impact with low overhead cost.

2. Congress and the Centers for Medicare and Medicaid Services (CMS) should make medically supportive food and nutrition interventions fully reimbursable benefits through Medicaid and Medicare.

Medically supportive food and nutrition (MSF&N) refers to a spectrum of food-based interventions—including medically tailored meals, medically supportive meals, medically tailored groceries, medically supportive groceries, produce prescriptions and food pharmacies— designed to prevent, reverse, and manage certain health conditions. Evidence strongly suggests that a broad range of healthy food supports can reduce average blood sugar in those with diabetes, blood pressure and preterm birth rates as well as reduce health care costs.⁴ This broad spectrum of MSF&N interventions also allows for increased patient autonomy and opportunities to ensure the interventions are culturally relevant.

The administration has the opportunity to build on this strong evidence base to improve the health of millions of Americans by making MSF&N interventions covered benefits. As the administration builds towards this long term goal there are a number of short term changes that can be made to ease the transition from pilot to permanent. The first is supporting the Centers for Medicare and Medicaid

² SPUR, "California Fruit and Vegetable Supplemental Benefits: Scaling the Positive Impact Statewide," January 2022: <https://www.spur.org/sites/default/files/2022-07/Policy%20brief%20fruit%20veg%20supplemental%20benefits%202-13-22.pdf>

³ SPUR, "SPUR and Others to Pilot New Technology for Making Healthy Food More Affordable," February 15, 2022: <https://www.spur.org/news/2022-02-15/spur-and-others-pilot-new-technology-making-healthy-food-more-affordable>

⁴ SPUR, "The Case for Medically Supportive Food and Nutrition,": https://www.spur.org/sites/default/files/2021-01/copy_of_msf_n_infographic_0.pdf

Services (CMS) and the American Medical Association to develop specific, appropriate billing codes for this broad spectrum of food-based interventions. Currently, there is a lack of billing codes built into the Healthcare Common Procedure Coding System (HCPCS) and Current Procedural Terminology (CPT). This lack of codes makes it more cumbersome for health plans, healthcare providers and state level administrators to track data and pay for services, leaving food-based interventions on the periphery of healthcare. Full integration into traditional workstreams is necessary for the most benefit to patients.

In addition, we encourage CMS to provide a detailed roadmap for states outlining the various mechanisms for providing food-based interventions in Medicaid Managed Care and develop guidance for how Medicaid waivers can be used to expand coverage of medically supportive food and nutrition interventions. In December 2021, CMS approved California's comprehensive 1115 and 1915b Medicaid waiver, known as CalAIM. Included in the waiver is a menu of 14 in-lieu of services (ILOS) ranging from housing supports to medically supportive food and nutrition interventions. The waiver's inclusion of food-based supports within Medicaid means California has joined North Carolina, Massachusetts and Oregon in piloting these important services which have the ability to improve health and reduce healthcare costs. By providing guidance on both mechanisms such as ILOS and waivers, additional states can join the growing list of those offering food-based interventions and help build data and best practices in the field. Lessons learned from current and future medically supportive food and nutrition pilots should be built on as the country moves towards making these standard covered benefits.

Thank you for considering our comments as you prepare for this fall's conference. If you would like additional information about anything discussed in this letter, please don't hesitate to reach out.

Sincerely,



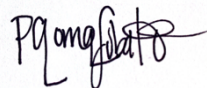
Eli Zigas
Food and Agriculture Policy Director



Katie Ettman
Food and Agriculture Policy Manager



Grecia Marquez-Nieblas
Food and Agriculture Program Manager



Paloma Sisneros-Lobato
Food and Agriculture Senior Policy Associate