

April 8, 2026

Ms. Nisha Murray  
Economic Research Service  
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 (ERS-2026-0001)

Dear Ms. Nisha Murray:

On behalf of the CACFP Roundtable, 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*.

Formed in 1977, CACFP Roundtable is a nonprofit organization that works alongside the Child and Adult Care Food Program (CACFP) community to educate, advocate, and support the field. Our work is centered around child, family, and caregiver needs and we value the services care centers and community-based organizations offer through the CACFP. The program serves as a vital strategy for improving nutritional security and addressing rampant food insecurity in our communities.

These comments respond to Questions 1–7 in the USDA Request for Information regarding Economic Research Service (ERS), National Agricultural Statistics Service (NASS), and Office of the Chief Economist statistical and research products.<sup>1</sup>

### Response to Question 1- Which NASS or ERS data are most valuable to your work, and why?

The Food Security Supplement to the Current Population Survey (CPS-FSS) is one of the most valuable federal datasets for understanding food hardship and evaluating nutrition policy in the United States.<sup>2</sup>

The CPS-FSS provides several methodological advantages that no other federal dataset replicates.<sup>3</sup>

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<sup>1</sup> *Request for Information on Opportunities, Challenges, and Emerging Areas in Statistical Data, Analysis, and Research at the U.S. Department of Agriculture*. (2026, February 23). Federal Register.

<https://www.federalregister.gov/documents/2026/02/23/2026-03497/request-for-information-on-opportunities-challenges-and-emerging-areas-in-statistical-data-analysis>

<sup>2</sup> U.S. Department of Agriculture Economic Research Service. (2026). *SUPPORTING STATEMENT FOR EXTENSION OF OMB APPROVAL OF THE FOOD SECURITY SUPPLEMENT TO THE CURRENT POPULATION SURVEY*. Reginfo.gov.

<https://www.reginfo.gov/public/do/DownloadDocument?objectID=150543902>;

Klein, M., Jaroz, B., Briefel, R., & Plata-Nino, G. (2025). *Threats to Food Security Data: Why the “Redundancy” Claim Doesn’t Hold Up* - Food Research & Action Center. Food Research & Action Center.

<https://frac.org/blog/threats-to-food-security-data-why-the-redundancy-claim-doesnt-hold-up>

<sup>3</sup> Williams, K., & Pastoor, I. (2025, October 10). *Measuring Food Security with U.S. Federal Data – Use It for Good*. Popdata.org. <https://blog.popdata.org/food-security-data-cps/>



- 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, which measures the full severity spectrum of food insecurity.
- Detailed contextual variables, including food expenditures, minimum necessary food spending, and participation in public benefit programs.

The Household Food Security Survey Module was developed through extensive research and validation by USDA researchers and collaborators. The module is widely recognized as the gold standard for measuring food insecurity in the United States.<sup>4</sup>

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.

ERS also has a long history of conducting extensive research on the child nutrition programs. This includes annual reports such as *The Food and Nutrition Assistance Landscape* along with [additional data and analysis](#).<sup>5</sup> This research is critical as it focuses on the impact of the child nutrition programs on diet and health outcomes, including the impact of policy changes. This research is critical in guiding policy and implementation and must be continued.

#### *Specific to the Child and Adult Care Food Program (CACFP)*

Researchers use the data collected and published by ERS to understand the landscape of nutritious and healthy foods in the United States. Researchers use the reports and data sets to contextualize access to healthy meals provided through the CACFP in care settings. Having these datasets assists researchers, operators, and policymakers when making decisions or providing recommendations to decrease health risks in our young children and improve developmental growth.

These are some of the data sets and reports that have been quintessential to CACFP research.

#### County-level Data Sets

- These data sets are often used to pull together county-level data for research related to poverty rates, educational attainment, and unemployment rates/median household income and have broad application

#### Food Access Research Atlas and Poverty Area Measures

- These GIS datasets are valuable tools for examining the geographical relationship and economic conditions in which CACFP operates. These datasets offer community-level insights that allow researchers to examine and visually illustrate predictors of nutritional risk. For example, researchers have utilized these datasets to

<sup>4</sup> Jarosz, B., & Dick, C. (2025). *Forsaking Food Security | America's Data Index*. Dataindex.us. <https://dataindex.us/newsletter/article/0e1a7dbb-47d1-4019-abb2-c1b7ef6c81f1>

<sup>5</sup> *Child Nutrition Programs | Economic Research Service*. (2025). Usda.gov.

<https://www.ers.usda.gov/topics/food-nutrition-assistance/child-nutrition-programs>



create CACFP Story Maps to identify areas in California with correlating low household income and low access to foods (previously defined as food deserts). These maps provide context for decisionmakers and operators as they seek to identify areas of high need for expanding access to the CACFP.

### Food Consumption, Nutrient Intakes, and Diet Quality

- Researchers use this data or refer to USDA reports of this data for their research projects. This is NHANES data.
- The National Health and Nutrition Examination Survey (NHANES) is one of the federal government's most rigorous and cost-effective tools for understanding the health and nutritional status of young children, particularly those served by programs like the CACFP. This data set is a unique combination of nationally representative dietary recalls, physical examinations, and laboratory measures, which provide objective and high-quality data that no other dataset can match. As compared to the commonly collected self-reported data, NHANES provides objective insights into the nutritional needs, dietary quality, and health disparities affecting children from low-income households. This is the most reliable benchmark for assessing dietary patterns, nutritional gaps, and evaluation of the potential impact of the CACFP. If there are to be meal pattern changes, the impact is primarily assessed through the NHANES data set. These data support program integrity, evidence-based decision-making, and evaluation that the CACFP is aligned with the actual health needs of the individuals it is intended to serve.

### Rural-Urban Commuting Area Codes

- Used for research where researchers are using zip-code data to categorize study participants into rural, suburban, urban.
- This has been used in research published about CACFP and WIC regularly.
- This dataset is regularly used in rigorous academic research on the federally funded child nutrition programs. Through these data, we are able to study geographic inequalities and assess whether the CACFP has differential impact across community types.

### Response to Question 2- What gaps exist in the agricultural data produced?

Eliminating the CPS Food Security Supplement would create a significant gap in the federal government's ability to monitor food insecurity.

While several federal surveys collect limited information on food security, none can replicate the CPS-FSS. These limitations demonstrate that no existing federal dataset can replace the CPS-FSS for comprehensive national monitoring of food insecurity.

USDA itself acknowledged this limitation in its most recent Information Collection Request approved by the Office of Management and Budget, noting that other surveys "do not provide suitable data for timely and reliable monitoring of the prevalence and severity of food insecurity in the Nation's households and in critical subpopulations."<sup>6</sup>

<sup>6</sup> U.S. Department of Agriculture Economic Research Service. (2026). *SUPPORTING STATEMENT FOR EXTENSION OF OMB APPROVAL OF THE FOOD SECURITY SUPPLEMENT TO THE CURRENT POPULATION SURVEY*. Reginfo.gov.

<https://www.reginfo.gov/public/do/DownloadDocument?objectID=150543902>



### 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, reliable, timely, and relevant to policy evaluation.<sup>7</sup> 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.

Additionally, ERS must continue to expand research on the child nutrition programs to measure program reach, identify barriers to participation, and support program improvement.

### Response to Question 4- How often should data be released or updated?

Food security data should continue to be collected annually, as is currently done through the CPS Food Security Supplement.

Annual data collection allows policymakers and researchers to:

- Monitor trends in food insecurity
- Detect emerging hardship during economic disruptions
- Evaluate the impact of policy changes

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<sup>7</sup> *Foundations for Evidence-Based Policymaking Act of 2018*. (n.d.). Retrieved March 4, 2026, from <https://www.govinfo.gov/content/pkg/COMPS-15356/pdf/COMPS-15356.pdf>



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

#### Response to Question 5- What geographic granularity 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, 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 ERS or NASS data products that are duplicative or outdated?

The CPS Food Security Supplement is neither duplicative nor outdated.<sup>8</sup>

Other surveys either:

- Exclude children
- Use shortened food security modules
- Have significantly smaller sample sizes
- Lack geographic identifiers
- Or are no longer fielded

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

#### Response to Question 7- Do you use non-USDA data to supplement USDA datasets?

Researchers frequently use non-USDA datasets to examine specific populations or policy contexts. However, these datasets are typically used in combination with CPS-FSS data rather than as substitutes.

The CPS-FSS serves as the national benchmark for measuring food insecurity, enabling researchers to contextualize findings from other surveys.

Without the CPS-FSS, it would be significantly more difficult to interpret trends in food insecurity or evaluate policy impacts.

#### Conclusion

The Food Security Supplement to the Current Population Survey is the nation's most reliable and comprehensive dataset for measuring food insecurity, and its continuation is essential not only for national monitoring but also for understanding the conditions in which federal child nutrition programs operate. No other federal survey provides the same combination of annual

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<sup>8</sup> Klein, M., Jaroz, B., Briefel, R., & Plata-Nino, G. (2025). *Threats to Food Security Data: Why the "Redundancy" Claim Doesn't Hold Up* - Food Research & Action Center. Food Research & Action Center. <https://frac.org/blog/threats-to-food-security-data-why-the-redundancy-claim-doesnt-hold-up>



data collection, large sample sizes, state-level estimates, and a full household food security module capturing both adult and child experiences.

In addition, ERS datasets such as the Food Access Research Atlas, Poverty Area Measures, Rural-Urban Commuting Area Codes and NHANES play a critical role in CACFP research by offering community-level, geographic, and nutritional data that cannot be obtained from CACFP administrative data or independently gathered datasets.

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, USDA should continue and strengthen the CPS Food Security Supplement and sustain the ERS datasets that underpin rigorous research on food security, nutrition, and the environments in which CACFP and other child nutrition programs operate.

We appreciate your consideration of these views.

Sincerely,

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