

Congress of the United States
Washington, DC 20515

August 13, 2021

The Honorable Gene Dodaro
Comptroller General of the United States
Government Accountability Office
441 G Street NW
Washington, D.C. 20548

Dear Comptroller General Dodaro,

As the United States Department of Agriculture (USDA, Department) continues its review of and update to the Thrifty Food Plan, as required in Section 4002 of the Agriculture Improvement Act of 2018, we write to request a fulsome analysis of the Department's process. The complexity of this process, and its likely impacts, create an urgent need for scrutiny, particularly on the heels of significant nutrition-related pandemic spending that has continued without rigorous oversight.

Without question, this review and update will have obvious and considerable impacts on the Supplemental Nutrition Assistance Program (SNAP). While we expect this process will elicit an increase to the cost of the Thrifty Food Plan—and subsequently monthly SNAP allotments—questions remain as to how the Department has gone about this review and update, including their methodologies, administrative practices, and legal authorities.

Specifically, we write to request the Government Accountability Office research and report on the following:

- I. The process—in detail—by which the Thrifty Food Plan is being updated, including, but not limited to:
 - a. Data and methods, including modeling;
 - b. Inputs and constraints, including cost;
 - c. Consumption patterns;
 - d. Measures of time and effort; and
 - e. Contents of the market basket
- II. The mathematical optimization model.
- III. How the 2021 process compares and contrasts with (differs from) previous processes (e.g., 1983, 1999, 2006).
- IV. It is likely the 2021 process is significantly condensed (January 22, 2021 issuance of Executive Order 14002 to USDA's expected August 2021 completion); what parts of the process, if any, have been eliminated, altered, etc.? Please provide an in-depth analysis of each step the Department did, or did not, take as a result of the Executive Order, as compared to the process without the Executive Order.

- V. Similar to (a), how the “Secretary’s calculations” (as seen in Sec. 3(u) of the Food and Nutrition Act of 2008, as amended) have changed since the start of this process.
- VI. The development, review, and clearance processes within the Department and with external agencies, i.e., who is responsible for initiating, developing, reviewing and clearing at each step, and upon the Department’s completion of the update. Please also document input from the Office of Management and Budget and/or the Office of Information and Regulatory Affairs, including their general involvement, feedback, coordination with the White House, etc.
- VII. Did the Department consider program integrity, fraud, and any other potential risks that might be associated with increased benefit amounts? Have others, i.e., the Office of the Inspector General, weighed in with risk assessments? If so, what do those assessments show?
- VIII. Is the Department inflating the 2015-2016 cost of the Thrifty Food Plan for each age-gender group? Has an analysis been done to compare those figures to 2019-2020 or 2020-2021 figures?
- IX. There should be a comparison of what is in Executive Order 14002 to the statutory requirement in the 2018 Farm Bill and the Food and Nutrition Act.
- X. Can the Department point to recent (2016 – current year) data that shows increased SNAP benefit allotments lead to consumption of healthier foods?
- XI. Please provide any legal opinions related to the Thrifty Food Plan, including its past updates. This includes legal advice rendered by the Office of the General Counsel, in any form (e.g., memoranda, formal opinion, email, oral). If any opinion is based on oral advice, please request the advice be reduced to written form for submission and analysis by GAO. In particular, legal analysis documenting the Department’s past practice of implementing Thrifty Food Plan reevaluations only on a cost-neutral basis, and the legal justification for changing this long-standing legal position and administrative practice.

Thank you for your time and prompt attention to this request. Should you have questions about this request, please contact Pam Miller for Senator Boozman at pam_miller@ag.senate.gov, or Jennifer Tiller with Representative Thompson at jennifer.tiller@mail.house.gov. We look forward to receiving a response no later than February 13, 2022.

Sincerely,



John Boozman
Ranking Member,
Senate Committee on Agriculture, Nutrition, and Forestry



Glenn ‘GT’ Thompson
Republican Leader,
House Committee on Agriculture