



1350 I STREET NW
SUITE 700
WASHINGTON, DC 20005
202-588-5180
NWLC.ORG

April 6, 2026

Submitted via www.regulations.gov

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 [ERS-2026-0001]

Dear Ms. Murray:

On behalf of the National Women's Law Center (NWLC), we submit these comments in response to the above-referenced Request for Information (RFI) issued by the U.S. Department of Agriculture (USDA) on February 23, 2026.¹

NWLC fights for gender justice—in the courts, in public policy, and in society—working across the issues that are central to the lives of women and girls. NWLC advocates for improvement and enforcement of our nation's civil rights laws and public benefits programs, with a particular focus on the needs of women of color, immigrant women, LGBTQIA+ people, and women with low incomes and their families. Longstanding structural inequities have undermined economic security for these communities, and data from the Food Security Supplement to the Current Population Survey (CPS-FSS) affirms that women, children, and families of color face a particularly high risk of food insecurity.² The CPS-FSS data and related analysis produced by the Economic Research Service (ERS) are especially important for researchers, policymakers, and the public to understand the risks these communities face—and the extent to which the Supplemental Nutrition Assistance Program (SNAP) and other USDA programs are addressing them.

In its RFI, the USDA poses 20 specific questions regarding information on opportunities, challenges, and emerging areas in statistical data, analysis, and research produced by the ERS, the National Agricultural Statistics Service (NASS), and the Office of the Chief Economist's World Agricultural Outlook Board (OCE-WAOB). NWLC appreciates the opportunity to share the following comment, in which we have responded to those questions that align with our expertise

¹ Request for Information on Opportunities, Challenges, and Emerging Areas in Statistical Data, Analysis, and Research at the U.S. Department of Agriculture, 91 Fed. Reg. 8403 (Feb. 23, 2026).

² See Matthew P. Rabbit et al., Economic Research Service, *Household Food Security in the United States in 2024*, U.S. DEP'T OF AGRICULTURE (USDA) (Dec.2025), <https://ers.usda.gov/sites/default/files/laserfiche/publications/113623/ERR-358.pdf?v=77231>.

and raise issues of particular importance to lower-income women and their families. The through line in our responses is clear: ERS must continue to sponsor the Food Security Supplement to the Current Population Survey, ensure it is fielded annually, and analyze and publicize this critical data.

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

The Food Security Supplement to the Current Population Survey, which the U.S. Census Bureau fields and ERS sponsors, is one of the most valuable federal datasets for understanding food hardship and evaluating nutrition policy in the United States. The CPS-FSS provides several methodological advantages that no other federal dataset replicates,³ including three decades of uninterrupted data, allowing for long-term trend analysis; large, nationally representative sample sizes with state-level identifiers; a full analysis of food insecurity for children; and variables capturing critical contextual details, such as food expenditures and public benefit program participation.

The CPS-FSS also includes the 18-item Household Food Security Survey Module, which measures the full range of food insecurity. This module was developed through extensive research and validation by USDA researchers and collaborators, and is widely recognized as the best measure of food insecurity in the United States.⁴ Without the CPS Food Security Supplement, there is no consistent, nationally representative measure that can be used to assess the prevalence of hunger and food hardship—including at the state level—and inform policy decisions in response.

2. What gaps exist in the agricultural data produced?

Eliminating the CPS-FSS would mean eliminating the federal government’s ability to comprehensively monitor food insecurity nationwide—creating a new and detrimental data gap for researchers and policymakers. As the USDA itself acknowledged in its most recent Information Collection Request approved by the Office of Management and Budget, 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.”⁵ The CPS-FSS serves as the national benchmark for measuring food insecurity, enabling researchers to contextualize findings from other, more limited surveys.

Without the CPS-FSS, it would be significantly more difficult for policymakers, advocates like NWLC, and other stakeholders to interpret trends in food insecurity or evaluate policy impacts.

³ See Keri Williams & Isabel Pastoor, *Measuring Food Security with U.S. Federal Data*, USE IT FOR GOOD (Oct. 10, 2025), <https://blog.popdata.org/food-security-data-cps/>.

⁴ Chris Dick & Beth Jarosz, *Forsaking Food Security*, DATAINDEX.US (Sept. 25, 2025), <https://dataindex.us/newsletter/article/0e1a7dbb-47d1-4019-abb2-c1b7ef6c81f1>.

⁵ Economic Research Service, *Supporting Statement for Extension of OMB Approval of the Food Security Supplement to the Current Population Survey (OMB Control # 0536-0043)*, REGINFO.GOV (submitted Jan. 6, 2025), <https://www.reginfo.gov/public/do/DownloadDocument?objectID=150543902>. See also *OIRA Conclusion: OMB Control No. 0536-0043*, REGINFO.GOV (Apr. 7, 2025), https://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=202412-0536-001 (approving extension of CPS-FSS through April 30, 2028).

3. What new topic areas should USDA prioritize for data products?

In addition to maintaining the CPS-FSS as the national benchmark, USDA should strengthen its research related to food insecurity by prioritizing data collection and analysis of food insecurity among rural populations, older adults, children, households with disabilities, communities of color, and the LGBTQI+ community. Whenever possible, USDA should allow for disaggregation and cross-tabulation of data by gender, race, income, household or family structure, and other demographic characteristics.

In addition, USDA surveys should include food security questions alongside variables related to health, housing, education, and economic hardship, which allow researchers to examine how food access interacts with broader social and economic conditions. And we encourage USDA to collect data that enables researchers to further examine the impact of SNAP and other federal nutrition programs on household food security.

4. How often should data be released or updated?

Food security data should continue to be collected annually, as the CPS-FSS historically has done. Less frequent data collection is inadequate for policymakers and researchers to monitor trends in food insecurity and evaluate the impact of policy changes. Annual data is also essential to detect emerging hardship during economic disruptions.

The Food Access Research Atlas has been extremely valuable in examining food deserts across the nation, but is in need of an update. This resource has not been updated since its release of 2019 data—prior to the COVID-19 pandemic, a period of high food insecurity, and subsequent changes to nutrition and assistance policy.

5. What geographic granularity best supports your work?

While NWLC is a national organization, we work frequently with state-based advocates and policymakers to develop policy solutions that are responsive to the specific needs of their communities. Accurate state-level data are essential to inform these policy decisions—and the CPS-FSS is uniquely capable of producing reliable state-level estimates of food insecurity.

6. Are there ERS or NASS data products that are duplicative or outdated?

The CPS Food Security Supplement is neither duplicative nor outdated.⁶ Other surveys exclude children; have significantly smaller sample sizes; use less comprehensive measures of food security; are not state-specific; and/or are no longer fielded. The CPS-FSS is thus irreplaceable for measuring the prevalence and severity of food insecurity nationally and at the state level.

The Food Access Research Atlas is not duplicative; it is a unique source of data on food access nationally. While the current Atlas using 2019 data is extremely valuable, as noted above, it would be more valuable still to have updated information to determine where best to target policy solutions.

⁶ Melanie Klein et al., *Threats to Food Security Data: Why the “Redundancy” Claim Doesn’t Hold Up*, FOOD RES. & ACTION CTR. (Oct. 31, 2025), <https://frac.org/blog/threats-to-food-security-data-why-the-redundancy-claim-doesnt-hold-up>.

9. Which ERS or OCE–WAOB research or analytical products (e.g., farm income, situation and outlook reports, ERS research reports, WASDE) are most valuable to your work, and how do you use them?

The Household Food Security report produced by ERS provides a yearly snapshot of hunger and food hardship, as measured by the CPS-FSS. For decades, this annual report—and the data underlying it—has been the nation’s most reliable tool for understanding how many families in the United States struggle to keep food on the table, an important metric of economic stability and security.

The Household Food Security report also tracks the extent to which SNAP and other critical federal nutrition assistance programs are reaching individuals and families facing food insecurity. This data is critical for understanding how the reach and effectiveness of federal nutrition programs vary across subpopulations, including women and their families. We strongly urge USDA to reconsider its plans to end production of the Household Food Security report,⁷ and to maintain the CPS-FSS as well as all ERS reports and resources that publicize and analyze this invaluable dataset.

The Food Access Research Atlas produced by ERS provides critical information on the detailed geographic areas of populations with low incomes and low access to healthy foods. This data overlaps with vehicle access and is particularly crucial to analyze food access. This tool has been essential to understand and report on food deserts, particularly as its format does not require data analysis or software to be used.

15. What tools or formats would improve the usability of ERS, NASS, and OCE–WAOB products (e.g., dashboards, machine-readable files, visualizations, downloadable tables)?

At minimum, ERS should maintain its current practice of providing clear, up-to-date, accessible, interactive visualizations of annual CPS-FSS data on its website,⁸ along with public-use household-level CPS-FSS data files for each year since 1995 and the additional resources available for researchers on the ERS “Food Security in the United States” webpage as of March 20, 2026.

Reports, interactive data dashboards, downloadable subsets of data, and/or tables (including table creators) with intersectional demographic breakdowns are incredibly valuable to view and cite data. These formats increase the accessibility and usability of this rich and important data to non-technical audiences as they do not require users to use complex public use microdata, pay for costly data analysis software, or be knowledgeable in such software.

20. What is the best way for ERS, NASS, and OCE–WAOB to receive ongoing feedback on its data and analysis? Are there groups or forums we should engage with more regularly?

⁷ See *USDA Terminates Redundant Food Insecurity Survey*, USDA (Press Release No. 0219.25, Sept. 20, 2025), <https://www.usda.gov/about-usda/news/press-releases/2025/09/20/usda-terminates-redundant-food-insecurity-survey>.

⁸ Economic Research Service, *Food Security in the U.S. – Interactive Charts and Highlights*, USDA (last updated Feb. 18, 2026), <https://www.ers.usda.gov/topics/food-nutrition-assistance/food-security-in-the-us/interactive-charts-and-highlights>.

ERS, NASS, and OCE-WAOB should actively seek feedback from stakeholders regarding the data and analysis they produce to help ensure that federal statistics continue to reflect real information needs across government, research, and community organizations. USDA and its sub-agencies should not unilaterally cancel important surveys or make significant changes to data and research products without stakeholder input. Seeking public comment on any such move should be standard practice.

While this RFI is a helpful exercise in this regard, ERS in particular should take additional steps to strengthen engagement with key communities, including academic researchers, anti-hunger organizations, state and local governments, and policy advocates. Many of these groups rely heavily on federal datasets to track food insecurity, rural economic conditions, and the effectiveness of public programs. Establishing new channels for feedback with representatives from these sectors would ensure that changes to data collection are informed by those most affected.

Conclusion

The Food Security Supplement to the Current Population Survey is the nation's most reliable and comprehensive source for measuring food insecurity. No other federal survey provides the same combination of annual data collection, large sample sizes, and a full household food security module capturing both adult and child experiences.

Preserving this dataset—and continuing to make it accessible to the public through the Household Food Security report and other means—is critical to USDA's mission and aligns with federal statistical standards that call for accurate, objective, and policy-relevant data. For the aforementioned reasons, we urge the USDA to continue and strengthen the CPS Food Security Supplement and reinstate the ERS Household Food Security report.

Thank you for your consideration. Should you have any questions, please contact Courtney Anderson (canderson@nwlc.org) and Sarah Javaid (sjavaid@nwlc.org).

Sincerely,



Courtney Anderson
Social Insurance Legal Fellow
National Women's Law Center



Sarah Javaid
Senior Research Analyst
National Women's Law Center