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Submitted via www.regulations.gov

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**Re: Request for Information: Opportunities, Challenges, and Emerging Areas in
Statistical Data, Analysis, and Research
USDA-2026-0034-0008**

This comment is submitted by a poverty and social policy researcher at the Center on Poverty and Social Policy at Columbia University. Our center produces rigorous research that examines the effects of poverty on children, families, and communities in the U.S., nationally, by state, and in New York City. We also assess the impact of social policies and programs on economic well-being and opportunity.

This comment focuses on the importance of the Food Security Supplement (FSS) within the Current Population Survey (CPS) and the annual Household Food Security (HFS) reports and supplementary data and materials that draw on the FSS to provide critical insight into the food security of the U.S. population and trends over time. As a researcher, I write to express serious concern over the loss of the FSS, following the fall 2025 announcement that it, alongside future HFS reports, will be discontinued.

This is an essential piece of our nation's public data infrastructure and leaves a gap in our understanding of how American households are faring in meeting one of the most important basic needs – food – that cannot be easily replaced by alternative sources of information. It also comes at a time when American households are facing changeable economic and social safety net conditions, including the cost of food and significant pending changes to the Supplemental Nutrition Assistance Program (SNAP), and it is critical to be able to accurately assess changes in their well-being in a trusted and timely fashion.

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

The FSS is an invaluable data resource, alongside the HFS reports, within our work and for researchers who study family economic well-being nationwide. It establishes a trusted baseline for understanding whether and how families are meeting their food needs across the country. Its large, nationally representative sample sizes outmatch any other data sources available – no other survey in the US, even if happens to administer the full 18-item Household Food Security Survey Module, captures a similarly robust sample that enables both national and population subgroup analysis, alongside state-specific information.

The 18-item module captures different levels of food insecurity, as well as how different aspects of food security play out differently among adults and children. Developed and led by the

USDA, it also forms the baseline for how other surveys collect and assess information on hunger in the US. The loss of this full module in a federal public dataset marks the loss of a gold standard research instrument.

The FSS has also been in place for thirty years, enabling important looks at long-term trends through population shifts, policy changes, and economic booms and busts. Significant economic and policy changes are often difficult to anticipate ahead of time but are critical to capture in terms of impact when they do occur. For example, in recent decades, the FSS data and HFS reports have been invaluable sources of information on how households fared through the Great Recession and the recovery period afterward, as well as through the economic and health crises of the COVID-19 pandemic – where, the FSS data and HFS reports revealed, food insecurity ultimately fell to historic lows even amidst a global pandemic due to the expanded food assistance enacted during the Trump and Biden Administrations in 2020 and 2021.

On a personal level, I can attest to the invaluable nature of the FSS data in my research. I have recently been exploring understudied trends in family size and food security, with a focus on children, to understand how children in larger families fare compared to those in smaller families and also the degree to which SNAP may or may not impact the food security of children across family sizes differently. For various reasons, this work was originally started in the Panel Study of Income Dynamics (PSID), another important and highly respected dataset in the field that draws on the USDA's 18-item food module. A number of features of the PSID complicated this specific research project, however, including the staggered years of data collection that clouded the findings. Ultimately, my collaborator and I recognized that the best approach would be to instead conduct our research within the FSS. The larger sample and the availability of continuous annual data over decades immediately provided clearer and more informative results; one of the most important reasons being that all the years of missing data filled in within the FSS revealed essential patterns and trends, particularly before and after economic downturns.

This is just one small example, but also important to note that in future, this research would not be possible given the interruption to the FSS data series now moving forward. It is impossible to quantify how much future research will go uncondacted across the field without this critical data asset.

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

Rather than identifying new topics for data products, the FSS and HFS should be restored.

4. How often should data and information be released or updated (e.g., annually, quarterly)?

The FSS should be restored as an annual component of the CPS and the annual HFS should be restored to its former release schedule.

6. Are there NASS or ERS data products, data sets, and other relevant information that are duplicative, outdated, or underutilized? What improvements, changes or consolidations could be made (e.g., more timely, different data collection methods)?

The reasons provided in the USDA press release of September 20, 2025 announcing the end of HFS reports moving forward was that the information in these reports was “redundant, costly, politicized, and extraneous”.¹ The FSS and HFS are not redundant, nor extraneous; as noted above, they have – for decades – formed the backbone of food security research in the US and are the baseline against which all other surveys that examine food security with different samples are assessed. The cost of this data collection and report production in producing essential economic indicators is minor compared to the insights that it is able to deliver in order to assess the economic well-being of US households and the efficacy of large-scale public investments in food and nutrition programs, as well as related economic activity. And since their establishment, the FSS data and HFS reports have been a highly trusted and valued objective source of information for researchers nationwide.

10. What emerging policy or economic issues should be addressed in ERS or OCE-WAOB economic analysis, outlook, and forecasts?

One of the most pressing policy issues that necessitates the restoration of the FSS and HFS, but also represents a priority area for the ERS in general, is the large-scale federal funding cut to SNAP that could result in significant reduction in eligibility, benefits, access, and receipt. SNAP currently serves over 40 million individuals in more than 20 million families, including almost 1 in 5 children nationwide, and provides critical support in covering the cost of food.² H.R.1 makes the largest funding cut to SNAP in its programmatic history, removing close to \$190 million in funding over the next ten years. The cuts will play out across the country in different ways, as states grapple with different capacities to make up the federal funding shortfall and make different decisions about how to administer SNAP in their jurisdictions moving forward.

SNAP is key for affording groceries for tens of millions of families and functions as an important economic multiplier, with USDA ERS research estimating a 1.54 multiplier effect of SNAP benefits on US Gross Domestic Product (GDP).³ It also has particular benefit for children, being linked to better health outcomes, improved academic performance, and fewer crimes committed.⁴ In the long run, those with childhood access to SNAP grow up to work and earn more and have better health.⁵ Cutting benefits would thus adversely affect recipient children immediately and lastingly over time.

Indeed, research from our center has shown that a loss of SNAP produces significant short- and long-term economic costs to society. Economic losses are driven by the fact that SNAP cuts reduce the long-term health, earnings, and future tax contributions of child SNAP recipients and increase costs for child protective services, the criminal legal system, and healthcare. Cutting

¹ USDA. 2025. [USDA Terminates Redundant Food Insecurity Survey](#).

² Jones, 2025. [Supplemental Nutrition Assistance Program \(SNAP\) – Key Statistics and Research](#). USDA.

³ Jones, 2025. [Supplemental Nutrition Assistance Program \(SNAP\) – Key Statistics and Research](#). USDA.

⁴ Gundersen. 2015. Food assistance programs and child health. *The Future of Children*, 25(1):91–109; Frongillo, Jyoti, & Jones. 2006. Food stamp program participation is associated with better academic learning among school children. *The Journal of Nutrition*, 136(4): 1077–1080; Barr & Smith. 2023. Fighting crime in the cradle. *Journal of Human Resources*, 58(1): 43–73.

⁵ Bailey et al. 2024. Is the social safety net a long-term investment? Large-scale evidence from the food stamps program. *The Review of Economic Studies*, 91(3):1291–1330.

SNAP benefits would also lead to worse health for parents and greater healthcare costs. Every \$1 in SNAP lost to children and families per year would cost society anywhere from \$14 to \$20 at the national level. States that see bigger cuts in SNAP benefits or who have larger shares of their population living on low incomes would see bigger economic losses.⁶

This is a pressing issue unfolding over the next few years, with implications for a generation. The FSS and HFS are critical data and information resources that are needed more than ever during this period. And how these significant changes to SNAP play out across households and the economy represent an important priority area for ERS attention.

Additional areas for ERS attention include the impact of a changeable economy on the cost of food, as well as access to essential food items amidst tariffs and shipping disruptions – all of which also have the potential to affect household incomes, food security, and overall well-being.

For these reasons, I submit this comment to express our concern as a poverty and social policy researcher over the discontinuation of the FSS data collection and HFS reports and urge their restoration, as well as increased attention to the economic and social ramifications of changes in SNAP and food costs amidst uncertain economic conditions moving forward.

Sincerely,

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⁶ Koutavas, Wang, Garfinkel, Ananat, Collyer, Curran, Hartley, & Wimer. 2025. [The economic costs of cutting SNAP: Every \\$1 in SNAP cuts to families with children costs society \\$14 to \\$20](#). New York: Center on Poverty and Social Policy, Columbia University.