Nourish California is a statewide, non-profit organization that collaborates with diverse community partners to advance policies to ensure all Californians have equitable access to food, health, and well-being.

We recognize the root causes of hunger and poverty, including the historic and ongoing harms of systemic racism.[1] To eliminate consequent inequities, communities, policymakers, researchers, advocates, and other stakeholders must be able to assess outcomes across racial and ethnic identities. This requires accurate, timely data from public services such as the federal nutrition programs, including the Supplemental Nutrition Assistance Program (SNAP).

Eliminate Visual Observation

Researchers support self-report as the benchmark method of collecting data on race/ethnicity.[2] Studies show that other approaches to collecting data on race/ethnicity,

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[1] California Task Force to Study and Develop Reparation Proposals for African Americans, Interim Report, June 2022 https://oag.ca.gov/system/files/media/ab3121-reparations-interim-report-2022.pdf.

Odoms-Young A, Bruce MA. Examining the Impact of Structural Racism on Food Insecurity: Implications for Addressing Racial/Ethnic Disparities. Fam Community Health. 2018 Apr/Jun;41 Suppl 2 Suppl, Food Insecurity and Obesity(Suppl 2 FOOD INSECURITY AND OBESITY):S3-S6. doi: 10.1097/FCH.0000000000000183. PMID: 29461310; PMCID: PMC5823283.

[2] Higgins, P. C., and E. F. Taylor. 2009. Measuring racial and ethnic disparities in health care: Efforts to improve data collection. Princeton, NJ: Mathematica Policy Research.

Wei, I. I., B. A. Virnig, D. A. John, and R. O. Morgan. 2006. Using a Spanish surname match to improve identification of Hispanic women in Medicare administrative data. Health Services Research 41(4):1469-1481.

such as visual observation, are inaccurate in comparison to self-reported data.[3] Visual observation also inherently denies individuals the agency and dignity of self identification. For these reasons, we adamantly support the removal of regulatory language that names "visual observation" as an example of how State agencies might collect race and ethnicity data when participants do not voluntarily provide race/ethnicity information on a SNAP application. We also call for federal regulations to eliminate visual observation as an allowable method of collecting race and ethnicity data for SNAP. Such regulations are already in place for California[4] and should be enacted nationwide to respect all SNAP applicants and to uphold the rigor and reliability of essential data.

Engage Directly Affected Individuals

State and federal administrators of SNAP should proactively engage SNAP participants, SNAP applicants, and individuals who are likely eligible but not reached by SNAP to inform data collection policies and practices related to race/ethnicity. Soliciting input from directly affected individuals through surveys, interviews, focus groups, listening sessions, and other similar means can help identify methods and metrics (e.g.

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[3] Buescher, P. A., Z. Gizlice, and K. A. Jones-Vessey. 2005. Discrepancies between published data on racial classification and self-reported race: Evidence from the 2002 North Carolina live birth records. Public Health Reports 120(4):393-398.

Hahn, R. A. 1992. The state of federal health statistics on racial and ethnic groups. JAMA 267(2):268-271. West, C. N., A. M. Geiger, S. M. Greene, E. L. Harris, I. L. Liu, M. B. Barton, J. G. Elmore, S. Rolnick, L. Nekhlyudov, A. Altschuler, L. J. Herrinton, S. W. Fletcher, and K. M. Emmons. 2005. Race and ethnicity: Comparing medical records to self-reports. Journal of the National Cancer Institute. Monographs.(35):72-74.

Williams, D. R. 1998. The quality of racial data. Washington, DC: U.S. Department of Health and Human Services.

[4] https://www.cdss.ca.gov/Portals/9/Additional-Resources/Letters-and-Notices/ACLs/2020/20-96.pdf

race/ethnicity categories) that are most likely to successfully facilitate accurate responses from SNAP applicants. This input should be used to improve the collection of race/ethnicity data via SNAP application. The input should also be applied to the development and dissemination of best practices for establishing alternative methods for the collection of race/ethnicity data when such data is not voluntarily provided on the SNAP application.

Data Matching

In considering alternative methods such as data matching between public programs/services to collect information on race/ethnicity, state and federal administrators should ensure that the matched data sources do not rely on visual observation.

Decline to State

SNAP administrators should make clear to all applicants that they can decline to state information about their race/ethnicity. If an applicant declines to voluntarily provide this information, the data should be identified as being provided through another source, and that source should be identified (e.g. SNAP eligibility worker, data matching). Understanding the source of race/ethnicity data will allow for more accurate interpretation of research and analysis that relies on this information.

Disaggregate Data

SNAP guidance should emphasize the collection of disaggregated race/ethnicity data. In addition to collecting information about race and ethnicity according to the minimum

OMB standard,[5] SNAP administrators should adopt methods to collect more granular data. Research shows significant disparities across multiple outcomes for more granular racial/ethnic groups within the broader categories of the minimum OMB standard.[6] For instance, though Asian Americans as a whole experienced poverty at a rate three percentage points lower than the national average,

> *Mongolian and Burmese had the highest poverty rates among all Asian origin groups, at 25% – more than twice the national average and about four times the poverty rates among Indians (6%).*[7]

Without the use of more detailed race/ethnicity categories, we will fail to detect and address such inequities.

In addition to collecting data on disaggregated racial/ethnic groups, SNAP administrators should allow for the collection of detailed racial/ethnic data from individuals who identify

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[5] The OMB minimum categories for race are American Indian or Alaska Native, Asian, Black or African American, Native Hawaiian or Other Pacific Islander, and White. The OMB minimum categories for ethnicity are Hispanic or Latino and Not Hispanic or Latino. https://minorityhealth.hhs.gov/omh/browse.aspx?lvl=3&lvlid=54#1

[6] José J. Escarce et al., The Health Status and Health Behaviors of Hispanics, in Hispanics and the Future of America, ch. 9 (Marta Tienda & Faith Mitchell eds. 2006), https://www.ncbi.nlm.nih.gov/books/NBK19899/.

Abby Budiman & Neil G. Ruiz, Key Facts about Asian Origin Groups in the U.S., Pew Research Ctr. (Apr. 29, 2021), https://www.pewresearch.org/fact-tank/2021/04/29/keyfacts-about-asian-origin-groups-in-the-u-s/.

[7] Abby Budiman & Neil G. Ruiz, Key Facts about Asian Origin Groups in the U.S., Pew Research Ctr. (Apr. 29, 2021), https://www.pewresearch.org/fact-tank/2021/04/29/keyfacts-about-asian-origin-groups-in-the-u-s/.

as more than one race. To avoid the masking of racial disparities and inequities, SNAP administors should collect information both to determine if an applicant identifies as multiracial and to specify the racial groups to which the applicant ascribes.

As they work to develop community- and stakeholder-informed approaches to data collection, SNAP administrators should follow existing best practices for collecting disaggregated race/ethnicity data and multiracial data, such as the July 2022 guidance released from the Chief Statistician of the United States.[8]

Thank you for your attention to this comment. If you have any questions, please contact:

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[8] https://www.whitehouse.gov/wp-content/uploads/2022/07/Flexibilities-and-Best-Practices-Under-SPD-15.pdf