



February 8, 2021

To: President Joseph R. Biden, Jr.
Vice President Kamala D. Harris

Re: Recommendations for the Biden Administration

Dear President Biden and Vice President Harris:

Congratulations on your election to the highest offices of democratic service and leadership. As one of the leading institutions in the world for nutrition science and policy, the Friedman School's mission is to produce trusted science, future leaders, and real-world impact. The undersigned faculty – recognized experts in their fields – are pleased to provide the following food and nutrition policy recommendations to the Biden-Harris administration.

The success or failure of nearly all of the Biden administration's priorities for our nation depend upon effectively addressing *food and nutrition*, representing both a core challenge and opportunity. The priorities inseparably tied to food and nutrition include:

- COVID-19
- Health care
- Racial justice
- Economy
- Climate

We write to highlight the tremendous opportunities and specific policy actions for the Biden-Harris administration to leverage the power of food and nutrition to address these priorities.

COVID-19 can be considered a fast pandemic on top of a slower – but no less devastating – pandemic of nutrition insecurity, obesity, type 2 diabetes, and other diet-related diseases. And, these two pandemics are interlinked. Other than age, the top predictors of severe COVID-19 infections are diet-related risk factors such as obesity, diabetes, hypertension, and cardiovascular diseases. Together, these cardiometabolic conditions are estimated to be responsible for 64% of COVID-19 hospitalizations in the U.S. Good nutrition is foundational to address these conditions.

Even before COVID-19, our health care system was overwhelmed with diet-related chronic diseases. The sharp rise in obesity and type 2 diabetes in the past three decades has created enormous suffering and spiraling health care costs. Half of U.S. adults now have diabetes or prediabetes, nearly 70% have overweight or obesity, and over 80% of healthcare spending is on chronic diseases. On direct medical care for diabetes alone, the U.S. government spends about \$160 billion per year, exceeding the annual budgets of entire federal departments and agencies. Despite this cost to taxpayers and the nation's health, these diet-related burdens continue to rise.

Addressing the pandemic of diabetes, obesity, and related conditions is an issue that transcends political affiliation.

Over the past 30 years, national healthcare costs have skyrocketed, with the great majority spent on diet-related chronic diseases. This has created immense strains on federal and state budgets and on competitiveness of American businesses. In addition, rising healthcare premiums have contributed to stagnating real wages for most Americans. In 2019, the average American family would have earned nearly \$12,000 more if the proportion of their compensation spent on healthcare premiums had been constant since 1984.

Tragically, while these burdens are devastating every community, they are also causing tremendous health inequity. Black Americans, Latinx Americans, Indigenous Americans, Americans with lower incomes, and Americans living in poorer and rural counties suffer disproportionately from nutrition insecurity and diet-related health, economic, and social burdens. All these disparities have been exacerbated further by the pandemic and economic downturn. These challenges to stable access to healthy, affordable food represent deep legacies of systemic racism in the U.S. The economic collapse brought on by the pandemic has increased food insecurity in the U.S. to the highest rates since the U.S. government began its tracking, further amplifying the strains on children, families, and individuals trying to manage diet-related conditions. And with the pandemic, businesses throughout the U.S. food system, including restaurants, farms, manufacturers, retailers, and food banks have been upended by rapidly shifting supply chains and demand, straining and closing many food-related businesses across the U.S.

Food is also central to addressing climate. Globally, the food system contributes to 25% of all greenhouse gas emissions, with up to two-fold additional opportunity costs for actions we are not taking to reduce greenhouse gases through regenerative agriculture. The food system also contributes to 70% of global water use, 80% of global ocean and freshwater pollution (eutrophication), and 90% of tropical deforestation. These effects produce enormous strains on our nation's natural resources including on land use, water availability, loss of topsoil, deforestation, pollution of waterways, and loss of biodiversity. Climate change cannot be effectively addressed without a new emphasis on science and corresponding actions in our food system.

We commend the Biden-Harris administration for already taking several rapid, meaningful actions to reduce hunger and poverty in America. We write to suggest specific further actions for the administration to build upon that strong start to leverage the power of food and nutrition for our nation. Priorities include:

- Build a national consensus strategy on food and nutrition with a **White House Conference on Food, Nutrition, and Health**.
- Coordinate the diverse, currently fragmented, \$150+ billion annual federal investments in food and nutrition policy through a new **Office of the National Director of Food and Nutrition**.
- Build a better national health and science infrastructure and accelerate and expand nutrition science discovery and innovation with a new **National Institute of Nutrition** at NIH.
- Build back better health through “**Food is Medicine**” actions in Medicare and Medicaid.
- Build back better **Nutrition Security** for the COVID-19 recovery and beyond.

More details on these priorities, and additional specific policy actions, are below. The policy proposals we offer herein will reduce the burdens of diet-related diseases, reduce healthcare spending, build stronger population resilience to both COVID-19 and future pandemics, improve racial equity and social justice, create new jobs and businesses, re-invigorate rural America, and reduce climate change and regenerate our natural resources.

Sincerely,



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We thank Kurt Hager and Reece Lyerly, graduate students at the Friedman School, for their assistance with drafting this letter.

These comments represent the recommendations of individual Tufts faculty members. The opinions expressed in this document do not necessarily represent the views or opinions of the Friedman School of Nutrition Science and Policy, Tufts University, or its affiliates.

Top recommended policy actions for the Biden-Harris administration to leverage the power of food and nutrition to build back better and address COVID-19, health care, racial justice, the economy, and climate:

I. Build Back a Better National Consensus and Strategy on Food and Nutrition

In 1969, President Nixon convened the first, and still only, [White House Conference on Food, Nutrition and Health](#). This seminal bipartisan event brought together diverse leaders from public and private sectors to craft real solutions to address widespread hunger in America. Of its 1,800 concrete recommendations, 1,600 were implemented two years after the conference. This included many of the federal food and nutrition programs we take for granted today, significantly reducing hunger in America. Fifty-two years later, the food and nutrition problems we face have changed dramatically. We call on the Biden administration to:

1. Organize and host the second White House Conference on Food, Nutrition, and Health. Like the original conference, this conference be a crucial convening of public and private stakeholders (including all relevant domestic federal agencies) and a springboard to drive toward policy actions. This will be instrumental to build a national consensus strategy around food and nutrition, with a concrete plan of action and clear benchmarks to measure success. We call on the Biden administration to take advantage of this unique moment in our nation's history to build a new national consensus and strategy around food.

II. Build Back a Better National Health and Science Infrastructure

With more than 450,000 American lives lost due to COVID-19, many months remaining for full vaccine dissemination, the harmful intersections of diet-related cardiometabolic conditions, and future threats on the horizon, a strengthening of the U.S. public health infrastructure is vital. We recommend the Biden-Harris administration:

1. Provide new funding to NIH for foundational science and clinical trials that test the impact of food and lifestyle interventions on metabolic health, "long hauler" syndrome, COVID-19 severity, and boosting the immune system.
2. Coordinate the more than \$150 billion per year investments in federal food and nutrition programming through the creation of a new [Office of the National Director of Food and Nutrition \(ONDFN\)](#). This senior executive branch position will provide coordinated, actionable information and recommendations to the President, the Cabinet, and Congress on food and health, racial/ethnic equity, and sustainability issues across diverse agencies and programs including the U.S. Departments of Agriculture (USDA), Defense (DoD), Education (DoE), Veterans Affairs (VA), and Health and Human Services (HHS) including the Centers for Disease Control and Prevention (CDC), Centers for Medicare and Medicaid Services (CMS), Food and Drug Administration (FDA), and National Institutes of Health (NIH). This structure is modelled on the precedent and success of the Office of the Director of National Intelligence (ODNI), which effectively coordinates \$50 billion per year in investments in national security across multiple agencies.
3. Accelerate and expand nutrition science discovery and innovation:
 - a. Create and fund a new [National Institute of Nutrition \(NIN\)](#) within the NIH. This new institute can be created by Congressional statute and should be accompanied by meaningful new funding to complement existing NIH activities. The NIH is our nation's premier organization to seek fundamental knowledge about and apply that knowledge to enhance health, and to apply that knowledge for the benefit of the American people. It is therefore striking that the NIH does not include an Institute focused on the *leading cause of poor health in our nation – suboptimal nutrition*. A [recent NIH analysis](#) concluded that large mismatches exist between the top causes of poor health in the U.S. versus NIH research spending to address them, and that the largest gap

- was in the area of nutrition. A National Institute of Nutrition is essential to support foundational and translational research that addresses diet-related diseases, to coordinate nutrition science across the NIH and with other departments and agencies (USDA, DoD, VA, CDC, FDA, CMS, and more), to be a strong partner for the Dietary Guidelines for Americans (DGAs), to create dietary guidance for Americans to address diet-related conditions like obesity, diabetes, high blood pressure, cardiovascular diseases, and cancers (excluded by statute from the DGAs), to train scientists and healthcare professionals in nutrition, and to communicate with the public.
- b. [Strengthen nutrition research at USDA](#) on the intersections of human health, agriculture, and sustainability across the Research, Education, and Economics (REE) agencies.
4. Ensure sufficient scientific expertise and leadership on food, nutrition, and agricultural issues across critical federal offices, including within the White House Office of Science and Technology Policy (OSTP), President's Council of Advisors on Science and Technology (PCAST), and similar bodies and appointments within HHS, USDA, DoD, and VA.
 5. Significantly expand funding for the CDC's work in nutrition, physical activity and obesity (NPAO), given the impact of these factors on COVID-19 deaths and hospitalizations. [Currently, the CDC Division of NPAO receives only about \\$0.1 billion in federal funding per year](#). This pales in comparison to the [\\$160 billion spent annually](#) by the government on medical care for diabetes alone, a condition that is almost entirely preventable through healthier eating and physical activity.
 6. Call for dedicated, significant funding for the DGAs as well as regular updating of the Dietary Reference Intakes (DRI). This should include a focus on chronic diseases that are the leading causes of poor health, health disparities, and preventable healthcare spending in the U.S. For example, the DRIs on dietary fats, carbohydrates, and proteins have not been updated in 20 years, despite enormous advances in evidence and new controversies on optimal intakes. As described above, dedicated funding is also needed for an NIN to develop public guidance for diet and nutrition for the majority of Americans who suffer from diet-related chronic diseases, as by statute, the DGAs focus on healthy Americans and exclude guidance for any diet-related disease conditions.

III. **Build Back Better Health through "Food is Medicine"**

Sensible food and nutrition policy can help reduce the severity of COVID-19, restore our economy, improve national resilience toward future threats, and be a major step toward health equity. Such policies can also save hundreds of thousands of Americans from premature disability, suffering, and death each year as the pre-existing pandemics of obesity, poor cardiometabolic health, and systemic racism remain and must be addressed during and after the COVID-19 vaccination campaign.

The Biden-Harris administration should prioritize the following actions to integrate food and nutrition into health systems to address nutrition insecurity and diet-related diseases:

1. Aggressively expand [Food is Medicine actions](#). Priority opportunities include providing [Medically Tailored Meals](#) and [Produce Prescriptions](#) through [Medicare and Medicaid](#). Produce Prescriptions generally offer free or discounted produce to ambulatory patients whereas Medically Tailored Meals provide home-delivered, nutritious meals tailored to patients with severe chronic conditions and limitations in activities of daily living. Such programs are a high priority for healthcare systems, payers, and patients and have documented significant improvements in health outcomes and healthcare utilization, with [net cost savings](#) in some circumstances. Specific strategies include:
 - a. Encourage states to apply for [Section 1115 Waivers](#) that allow [Medicaid programs to pay for and test Food is Medicine programs](#) (currently ongoing in MA and NC).
 - b. Encourage Congress to pass the [Medically Tailored Home-Delivered Meal Demonstration Pilot Act of 2020](#); and pass a similar bill for Produce Prescription Programs in Medicaid and Medicare.

- c. Instruct the Secretary of Health and Human Services to issue guidance to include Medically Tailored Meals and Produce Prescriptions as reimbursable under the Rehabilitative Services Benefit or the Home Health Care Services Benefit.
2. Continue to expand Medicare and Medicaid reimbursement for telehealth, including nutritional counseling by Registered Dietitians (RDs), to improve access for underserved communities; and encourage Congress to pass the [Medical Nutrition Therapy Act of 2020](#) to expand access to nutritional counseling for common, diet-related chronic conditions.
3. Ensure federal policy supports education of physicians and other allied healthcare providers on food and nutrition and related behavior change strategies. Physicians at all levels of education and practice overwhelmingly feel they have been insufficiently trained and would like to have more training on food and nutrition. The federal government supports medical education in many ways, providing [many options](#) to advance food and nutrition training including through reform of accreditation requirements, medical licensing exams, specialty certification exams, and continuing medical education requirements.

IV. Build Back Better Nutrition Security for the COVID-19 Recovery and Beyond

Federal nutrition programs, including the Supplementation Nutrition Assistance Program (SNAP), Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), and the National School Lunch and Breakfast Programs (NSLP, NSBP), provide critical nutritional support for Americans at risk of food insecurity and diet-related conditions. We applaud President Biden’s commitment to strengthen SNAP by increasing benefits, providing additional nutritional support during the pandemic to families, and reversing the public charge rule. However, more can and must be done to address the crippling and inequitable rates of nutrition insecurity across America.

Improving Program Access

1. Remove work requirements from SNAP: it is precisely when one loses a job that they need SNAP the most. This requirement also places undue strain on low-income college students.
2. Promote combined applications for Medicaid and SNAP to ease the application burden on participants and government workers.
3. Promote automatic enrollment across programs (i.e., school lunch, SNAP, and Summer EBT).
4. Continue remote interviews for SNAP and WIC, or entirely waive interview processes.
5. Remove [barriers for active duty military](#) to enroll in SNAP, such as counting of military housing as wages.

SNAP

1. Prioritize the administration’s legislative proposals and administrative plans to increase SNAP funding, especially to revise the Thrifty Food Plan to enable it to pay for a full supply of healthy foods.
2. Protect the structure and funding of this critical program for the millions of Americans who struggle with food and nutrition insecurity. SNAP benefits should be updated and increased (beyond the additional investments proposed by the Biden administration) to ensure that low-income individuals, college students, and families can be food secure and meet the DGA goals, including taking into account the time and opportunity cost of shopping and preparing meals. Allow all households, rather than only those with

older adults or persons with disabilities, to claim actual shelter costs as well as medical costs to determine SNAP benefits. Streamline procedures to make it easier for eligible Americans to apply and enroll.

3. Make nutrition security a congressionally mandated third core objective within SNAP, commensurate with SNAP's other current core objectives of food security and fiscal integrity. Update the USDA Food Plans to create a Thrifty Food Plan that improves SNAP nutritional quality; and create a Deputy Administrator for nutrition within the USDA's Food and Nutrition Service (FNS) to ensure that nutrition is at the forefront of all USDA food assistance programs.
4. Leverage SNAP for better nutrition, improved health outcomes, reduced disparities, and lower healthcare spending. First, encourage state pilot programs to test innovative [nutrition incentive and disincentive programs](#) that guide participants toward healthier eating while preserving their choice and autonomy in food decisions. Second, increase funding for the GusNIP Produce Prescription programs that help pay for fruits and vegetables while also supporting American farmers [so that all SNAP participants can benefit](#).
5. Continue to expand online SNAP, allowing recipients to make purchases (including of fresh produce) via online grocery and retailers and through farmers markets and farm stands, to improve participant experience and increase access; and set new rigorous standards for online SNAP retailers, including the need for robust nutrition education and guidance in online platforms.

School Lunch and other Childhood Programs

1. Restore and further strengthen the Healthy Hunger Free Kids Act (HHFKA) nutrition standards for the National School Lunch and School Breakfast Programs, including stronger standards with respect to fruits, vegetables, and whole grains and reduced levels of sodium, added sugars, and refined grains and cereals. Research has shown these standards are working to improve dietary intake and prevent childhood obesity among low-income children.
2. Expand the Fresh Fruit and Vegetable Program, [which has successfully increased fruit and vegetable consumption](#) among low-income elementary school students, to middle and high schools.
3. Pass the [Stop Summer Child Hunger Act](#), which would enact a nationwide, summer electronic benefits transfer (EBT) program that would allow kids to access free meals during months when schools are closed. The successful [USDA Summer EBT pilots](#) documented high participation rates and improved dietary quality; and served as the basis for Pandemic-EBT during COVID-19 related school closures. All states now have increased administrative capacity to implement Summer EBT after operating P-EBT. The Biden administration should immediately capitalize on this opportunity.
4. Extend the USDA pandemic waivers for schools through the end of 2021.
5. Raise the school-meal reimbursement rate for all schools to provide more flexibility to cook from scratch and use healthier ingredients.
6. Expand enrollment of school districts in the Community Eligibility Provision, offering free breakfast and lunch to all students in low and middle-income districts.
7. Increase mandatory funding and expand access for the USDA Farm to School Grant program to support increased access to nutrition education and engagement with local/regional food systems.

WIC

1. Prioritize the administration's call to boost WIC funding.

2. Support breastfeeding among postpartum women by expanding investment in the Breastfeeding Peer Counselor Program, providing funding for breastfeeding supplies, and allowing for the purchase of banked donor milk.
3. Extend postpartum eligibility for mothers from six months to two years; and streamline participant access by extending certification periods to two years.
4. Extend eligibility for children by one year, until their sixth birthday, to ensure that no child slips through the nutrition gap between WIC and the National School Lunch and School Breakfast program.
5. Make it easier to obtain and utilize WIC benefits digitally, preferably in a way that is integrated with SNAP.

V. Build Back Better Food Systems for Sustainable Nutrition, Jobs, and Climate

We applaud the administration’s commitment to “create jobs in climate-smart agriculture, resilience, and conservation,” “to ensure that environmental justice is a key consideration in where, how, and with whom we build,” and to “address longstanding inequities in agriculture” that have existed nationwide since slavery and that continue today. The following actions will lay the foundation of a vibrant, productive, and regenerative food system that supports American jobs, health and prosperity, while mitigating the impacts of global warming.

1. Take advantage of agriculture-based opportunities to remove carbon from the atmosphere by integrating agricultural policy into a new broad federal strategy that utilizes economic incentives (e.g., a cap-and-trade program) to incentivize foods and production systems with lower carbon and methane emissions, implement actions that sequester carbon, such as agroecology and agroforestry, and incorporate dual-use energy systems that incorporate livestock or crops and renewable energy.
2. Provide increased funding to land-grant institutions and schools of nutrition to support agroecological research on the intersections between production, sustainability, and nutrition.
3. Increase funding for USDA working lands stewardship programs (i.e., the Conservation Stewardship Program and the Environmental Quality Incentives Program) to help farmers implement conservation practices that protect drinking water, regenerate soil, build soil organic matter, and diversify crops while improving agricultural yields. In addition, increase funding for farmland preservation and land retirement programs (e.g., the Agriculture Conservation Easement Program, Conservation Reserve Program) to protect agricultural lands and encourage farmers to remove environmentally sensitive land from production and plant resource-conserving land cover.
4. Reform crop insurance to maintain this critical safety net for farmers while further bolstering specialty crops and increasing incentives for soil-building and regenerative agriculture practices that boost farm resilience and improve nitrogen efficiency, especially cover crops.
5. Reform USDA’s agricultural checkoff programs to promote equal opportunity among producers, increase transparency, prohibit conflicts of interest and anti-competitive practices, and evolve messaging to be more in line with the DGAs
6. Increase funding and institutional capacity for public sector breeding and cultivar development programs to protect agricultural biodiversity and resilience.
7. Ensure that workers throughout the food system – who often have low wages and few benefits, and who

often face unsafe working conditions including during COVID-19, discrimination, and food insecurity (at a rate twice the national rate) – can access safe and healthy food. Actions in support of this priority include raising minimum wages, protecting the right to organize, and expanding protections in the Fair Labor Standards Act (FLSA) to cover all workers.

8. Reduce food waste by:
 - a. Passing [The Food Date Labelling Act](#) to set clear standards for consumers and food companies as to whether a label references a quality and taste concern or a legitimate food safety concern.
 - b. Increasing tax incentives and providing stronger guidance for healthy food donations, including donations by farmers, and other food recovery strategies.
 - c. Supporting innovative solutions in the non-profit and private sectors to improve post-harvest infrastructure, transport, and processing and packing.
 - d. Increasing collaborations between USDA and the EPA on food waste reduction.
9. Enact a comprehensive food jobs initiative, including a Farmer Corps program to help train the next generation of American farmers in regenerative, nutrition-focused agriculture.

VI. Build Back Better Food Environments: Helping Consumers and Businesses Make the Healthy Choice

For most Americans, the current food environment makes unhealthy foods the default choice. This must be flipped on its head, so that nourishing food is the easier, more accessible, and more affordable choice. The actions below will reduce public confusion, incentivize healthier choices, increase transparency, and reward businesses that prioritize nutrition and equity.

1. Reduce harmful additives in packaged foods, in particular excessive amounts of added sugars and sodium:
 - a. Implement the [10-year FDA voluntary sodium targets](#), which many businesses fully support.
 - b. Implement similar targets for added sugar, as developed by the [National Salt and Sugar Reduction Initiative \(NSSRI\)](#).
2. Support city, county, state, tribal, and federal tax strategies to increase the price of less healthful foods and beverages in retail and restaurant settings, and [pair this with subsidy strategies](#) to lower prices for healthy foods. The evidence makes clear that such policies would market-normalize the true societal costs of foods and [be highly cost effective in improving population health and in saving lives](#).
3. Strengthen and enforce existing policies and enact new standards for marketing of foods and beverages, in all forms of media, to children under age 12, and in particular to children of color.
 - a. Marketing standards should be based on sound nutritional criteria, such as a nutrient profiling system like the Food Compass.
 - b. Eliminate industry tax credits for the marketing of unhealthy foods.
4. Implement the 2017 Food Service Guidelines (FSGs) for Federal Facilities across all federal, state, and local government facilities, and hospitals. Encourage adoption of FSGs within the private and non-profit sectors to increase healthy food offerings, food safety, environmental stewardship, local procurement, and behavioral design strategies and to bolster demand for healthy foods and beverages.
5. Capture and spur the power of the private sector by expanding and specifying new Opportunity Zone incentives focused on investments in food, nutrition, and wellness to improve racial equity and reduce disparities.

6. Support and encourage new academic-civil society partnerships and private sector investments to catalyze the success and growth of BIPOC-owned food businesses, with a particular focus on restaurants given the strains of the pandemic, and also farms, retailing, and manufacturing.
7. Encourage and support new Environmental, Social, and Corporate Governance (ESG) private sector investment metrics that incorporate food and nutrition for health, equity, and sustainability.
8. Encourage and reward Benefit Corporation status (B-Corporation designation) for U.S. and multinational food businesses, including high standards of verified social and environmental performance, public transparency, and legal accountability to balance profit and purpose.