

Arguments Used in Public Comments to Support or Oppose the US Department of Agriculture's Minimum Stocking Requirements: A Content Analysis

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ARTICLE INFORMATION

Article history:

Submitted 25 April 2017
 Accepted 14 December 2017

Keywords:

Supplemental Nutrition Assistance Program (SNAP)
 Food policy
 US Department of Agriculture (USDA)
 Content analysis
 Healthy food

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<https://doi.org/10.1016/j.jand.2017.12.005>

ABSTRACT

Background In 2016, the US Department of Agriculture (USDA)'s Supplemental Nutrition Assistance Program (SNAP) Retailer Rule proposed several changes for SNAP-authorized retailers, including: requiring retailers to have at least 85% of their food sales come from items that are not cooked or heated on site before or after purchase; requiring stores to stock seven varieties of qualifying foods from four staple food groups; requiring stores to carry perishable foods in three of the four staple groups; requiring stores to carry six units of qualifying foods at all times (depth of stock); disqualifying multiple ingredient foods and accessory foods from counting toward depth of stock requirements.

Objectives To better understand arguments used to support or oppose the USDA's proposed rule that all SNAP-authorized retailers carry more nutritious foods.

Design We conducted a qualitative content analysis of a random sample of public comments posted to the US Federal Register (a publicly available database) in response to the USDA's proposed rule.

Participants/setting A random sample of 20% of all public comments submitted by individuals and organizations to the US Federal Register were analyzed (n=303) for this study.

Results Three main themes were discussed: 1) arguments used in opposition to the rule; 2) arguments used in support of the rule; and 3) facilitators to assist stores in implementing the rule. Some of the subthemes included focusing on definitions used in the rule, reduced food access caused by stores leaving the SNAP program, lack of space and equipment for healthy foods, and the potential for increasing healthy food access.

Conclusions Nutrition and dietetics practitioners may be tasked with working with stores to implement healthy changes. Nutrition and dietetics practitioners must understand the role that the USDA has in food policy. In addition, understanding how federal food policy influences the environments in which dietetics professionals' clients are making food choices is important.

J Acad Nutr Diet. 2018; ■:■-■.

THE SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM (SNAP) provides nutrition assistance to 47 million low-income individuals annually. SNAP offers benefits usable as cash for the purchase of certain foods, with the goal of alleviating food insecurity.¹ Currently, SNAP recipients are able to redeem benefits from more than 260,000 participating retailers nationwide.¹ Research shows that SNAP recipients perceive that the program successfully serves its primary purpose of assisting households to buy enough food to make ends meet and reduce food insecurity.² However, nutritional challenges have persisted for SNAP recipients over the past century. First piloted in 1939, SNAP focused on supplementing protein-calorie insufficiency and

reducing agricultural surpluses.³ However, currently SNAP recipients are confronted with the concurrent issues of obesity, chronic diseases, and food insecurity.⁴ Studies report that most SNAP recipients are relieved of caloric deficiency, but many have compromised dietary quality and do not meet the Dietary Guidelines for Americans.^{5,6} Greater access to calories derived from inexpensive, energy-dense foods and less access to more expensive, nutrient-rich foods^{7,8} may be one reason that low-income individuals are more vulnerable to diet-related chronic disease.⁹

In February 2016, the US Department of Agriculture (USDA) published draft rules that required all SNAP-authorized retailers to carry more nutritious foods, called "Enhancing

RESEARCH

Retailer Standards in the Supplemental Nutrition Assistance Program” (Table 1). The goal of the proposed rule was to increase access to healthier foods for SNAP recipients. The USDA’s proposed SNAP retailer rule presented several potential changes to the stocking requirements, including requiring retailers to 1) have at least 85% of their food sales from items that were not cooked or heated on site before or after purchases; 2) stock seven varieties of qualifying foods in four staple food categories (meat, poultry, fish; bread or cereals; fruits or vegetables; dairy); 3) carry perishable foods in three of four staple food groups; 4) carry 6 units of qualifying foods at all times, and 5) prohibit multiple-ingredient foods (eg, sandwiches and TV dinners) and accessory foods (eg, pastries, soda, and condiments) from being counted toward the variety, perishables, or depth of stock requirements. In total, the proposed SNAP retailer rule would have required stores to carry a minimum of 168 required food items at all times. Previously, the USDA required stores to only carry a minimum of 12 items.

Federal agencies are required to publish notices of proposed rulemaking in the Federal Register, which notifies the public of a pending regulation.¹⁰ Any person or organization may submit a comment. When agencies publish final regulations in the Federal Register, they must address the significant issues presented in comments and discuss any changes made in response to them. The USDA’s proposed rule was posted in the Federal Register, and public comments were accepted until May 18, 2016.¹⁰

Although the purpose of the proposed rule was to increase healthy food options available to SNAP recipients, stores can face barriers to stocking healthy food options, particularly fresh produce among small stores, including structural constraints,^{8,11} perceived low customer demand,^{11,12} perishability,¹¹ and limited vendor supply¹³ and quality¹⁴ in rural areas. One concern regarding the proposed rule is that implementation barriers would discourage retailers from participating in SNAP. The purpose of this study was to better understand the arguments used in the public comments to support or oppose the USDA’s proposed rule for stocking requirements, which would increase availability of more nutritious foods by SNAP-authorized retailers. Understanding stakeholders’ perspectives on the proposed rule is critical to use in current and future SNAP policy formation and implementation. Therefore, this study was conducted as a part of a joint project among members of the national Nutrition and Obesity Policy Research and Evaluation Network (NOPREN 2016) Rural Food Access Working Group.¹⁵ This group shares an interest in how policy can impact rural communities and has a high level of expertise in this area. Therefore, members volunteered to analyze public comments.

MATERIALS AND METHODS

A total of 1,283 comments were submitted to the US Federal Register in response to the rule. As in many research studies, the study team was restricted by time and financial resources to analyzing all the comments; therefore, we downloaded a list of all of the comments and used a random number generator to select 20% of the comments to be analyzed (n=303). After selecting the public comments to be analyzed, we downloaded each individual comment electronically and

RESEARCH SNAPSHOT

Research Question: What arguments were used by stakeholders to support or oppose the USDA’s proposed rule that all SNAP-authorized retailers carry more nutritious foods?

Key Findings: We conducted a qualitative content analysis of a random sample of public comments posted to the US Federal Register. Among 303 public comments, three main themes were discussed: 1) arguments used in opposition to the SNAP retailer rule; 2) arguments used in support of the SNAP retailer rule; and 3) facilitators to assist stores in implementing the SNAP retailer rule.

created a database that included the following information regarding each public comment submitted: submitter name, title, organization, and submitter type (ie, business, nonprofit, individual, government). A total of 303 nonduplicated public comments were downloaded separately, and the entire comment’s content was analyzed. Institutional Review Board (IRB) approval was not required for this study because the US Federal Register is a publicly available database, and submitters are notified before their comments are uploaded that it will be placed on a publicly accessible website.

To help with anonymity, the research team created two separate data files: 1) an Excel sheet with a document identification number, commenter name, state, organization, and stakeholder type and then the Atlas.ti file that included only the text of the public comment. However, the public commenters’ information was not uploaded into Atlas.ti (only the text of their public comment with the document identification number). Therefore, our coders did not see the individual’s information (unless it was written as part of the public comment). After public comments were analyzed, we used the document identification number to help identify which organizations/individuals wrote which comments.

A codebook for this study was developed through an iterative process. In the initial coding phase, three researchers (L.H.M., B.B., and L.A.) independently applied open coding to 20 of the 303 comments identified. Researchers compared open codes, reconciled coding discrepancies, and then created a codebook that was applied to all 303 comments. Five coding pairs (R.S. and E.M.; E.P. and B.H.; L.H.M. and C.F.; C.B.S. and E.P.; B.L. and L.B.D.) were trained by the principal investigator regarding the codebook and coding procedures. Each pair independently coded approximately 45 comments. Code discrepancies were discussed, and consensus was reached within each coding pair. Code frequencies were then determined and summary reports for each code compiled.

A qualitative approach was used to analyze the public comments. Researchers chose to conduct a thematic content analysis. Because this approach is a data-driven research strategy, theory is not always needed to conduct this analysis. Thematic content analysis is a common qualitative approach because it allows researchers to examine and record patterns (known as themes) based on the data.¹⁶ Thematic content analysis is considered an inductive approach to analyzing qualitative data because researchers create themes as they emerge from the data.¹⁷ This is considered an appropriate

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