

April 9, 2026

U.S. Department of Agriculture  
Economic Research Service  
1400 Independence Avenue SW, Mail Stop 1800  
Washington, DC 20250-1800  
Attention: Nisha Murray

**Re: Request for Information: Opportunities, Challenges, and Emerging Areas in Statistical Data, Analysis, and Research**

Dear Ms. Murray:

The American Kidney Fund appreciates the opportunity to submit comments on the Request for Information: Opportunities, Challenges, and Emerging Areas in Statistical Data, Analysis, and Research, issued by the U.S. Department of Agriculture's (USDA) Economic Research Service (ERS), National Agricultural Statistical Service (NASS), and the Office of the Chief Economist.

The American Kidney Fund (AKF) fights kidney disease on all fronts as the nation's leading kidney nonprofit. AKF works on behalf of the 1 in 7 American adults living with kidney disease, and the millions more at risk, with an unmatched scope of programs that support people wherever they are in their fight against kidney disease—from prevention through transplant. Through programs of prevention, early detection, financial support, disease management, clinical research, innovation and advocacy, no kidney organization impacts more lives than AKF. AKF is one of the nation's top-rated nonprofits, investing 96 cents of every donated dollar in programs, and holds the highest 4-Star rating from Charity Navigator and the Platinum Seal of Transparency from GuideStar.

We want to take this opportunity to urge USDA to reinstate the Food Security Supplement (FSS) to the Current Population Survey (CPS) and the annual Household Food Security (HFS) report and accompanying materials, including the statistical supplement and visualizations and charts that capture trends over time. The data in the annual HFS is a critical tool that allows policymakers and stakeholders to see how current policies and resources are addressing food insecurity in the U.S. The data also serves as a road map for action because it can demonstrate what is working, populations that are falling behind in food security, and where resources are needed. Given that the implementation of H.R. 1/Public Law 119-21 is estimated to cut \$187 billion from the Supplemental Nutrition Assistance Program (SNAP) through 2034,<sup>1</sup> it is more imperative than

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<sup>1</sup> Congressional Budget Office, Estimated Effects of Public Law 119-21 on Participation and Benefits Under the Supplemental Nutrition Assistance Program, August 11, 2025: <https://www.cbo.gov/system/files/2025-08/61367-SNAP.pdf>

ever to have accurate and public-facing data that can track how changes to SNAP eligibility and funding due to H.R. 1 are affecting food security across the country and for certain populations.

**Which ERS research or analytical products are most valuable to your work and how do you use them?**

Food insecurity can create substantial barriers to disease management, complicate treatment adherence, and severely impact quality of life. While research has explored the individual impacts of food insecurity on various chronic conditions, there is a lack of data quantifying burden in the end-stage kidney disease (ESKD) population. Understanding the prevalence of this burden is crucial for developing targeted interventions and public policies that address the unique needs of these individuals.

AKF has explored the impact of food insecurity among people living with ESKD. In December 2024, AKF disseminated an online survey, available in both English and Spanish, to a random sample of 10,000 patients with ESKD who receive need-based, charitable assistance from AKF. Food security was assessed using the Hunger Vital Sign<sup>™</sup>. A total of 1,227 participants completed the survey; 61% of respondents reported food insecurity. While our study participants represent a low-income ESKD population, the high rates of food insecurity, despite the financial assistance patients receive, indicate severe burdens faced by this group. This burden is particularly striking when compared with the 13.7% of U.S. households being food insecure, as reported in the 2024 HFS report.<sup>2</sup>

Being able to compare our data on food insecurity among the ESKD population with the data provided in the HFS report, including analyzing trends among subpopulations with similar characteristics, is incredibly valuable to our work. The HFS report and the data it provides has become the gold standard for understanding food insecurity in the U.S. Losing access to the report will be detrimental to the ability of organizations like AKF and policymakers to get a clear picture of how food insecurity is affecting people, particularly vulnerable populations. We again strongly urge USDA to reinstate the FSS and annual HFS report and its accompanying materials.

Thank you for the opportunity to provide comments on this RFI.

Sincerely,



Holly Bode  
Vice President of Government Affairs

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<sup>2</sup> Rabbitt, M.P., Reed-Jones, M., Hales, L.J., Suttles, S., & Burke, M.P. (2025). Household food security in the United States in 2024 (Report No. ERR-358). U.S. Department of Agriculture, Economic Research Service. <https://ers.usda.gov/sites/default/files/laserfiche/publications/113623/ERR-358.pdf?v=14719>