Highlights of GAO-23-105450, a report to congressional requesters

### Why GAO Did This Study

SNAP supplemented the food budgets of more than 41 million people in 2021. Following a provision in the Agriculture Improvement Act of 2018 to reevaluate the TFP by 2022, USDA completed a reevaluation of the TFP in 2021.

GAO was asked to review the reevaluation. This report examines (1) USDA's administrative process for reevaluating the TFP in 2021 and the extent to which the process employed leading project management practices; (2) the extent to which USDA gathered and analyzed external input to inform the reevaluation; and (3) how the methodology and results of the reevaluation compared to methodological standards.

GAO reviewed USDA documents, interviewed officials and external experts, and compared the information collected to key project planning practices; relevant OMB and USDA guidelines for information quality, peer review, and scientific integrity; federal standards for internal control; and GAO's assessment methodology for economic analysis.

#### **What GAO Recommends**

GAO is making eight recommendations, including that USDA develop policies to ensure TFP reevaluations follow key project management practices, peer review guidelines, and quality standards; and publish information to allow external parties to reproduce results. USDA did not explicitly agree or disagree with the recommendations but disagreed with GAO's selection and application of certain criteria. GAO believes the criteria were appropriate and stands by the findings, conclusions, and recommendations.

View GAO-23-105450. For more information, contact Kathryn A. Larin at (202) 512-7215 or larink@gao.gov.

#### December 2022

## THRIFTY FOOD PLAN

# Better Planning and Accountability Could Help Ensure Quality of Future Reevaluations

#### What GAO Found

The Thrifty Food Plan (TFP) describes how much it costs to eat a healthy diet on a limited budget, and is the basis for maximum Supplemental Nutrition Assistance Program (SNAP) benefits. In 2021, the U.S. Department of Agriculture (USDA) reevaluated the Thrifty Food Plan and made decisions that resulted in increased costs and risks for the reevaluated TFP. Specifically, the agency (1) allowed the cost of the TFP—and thus SNAP benefits—to increase beyond inflation for the first time in 45 years, and (2) accelerated the timeline of the reevaluation by 6 months in order to respond to the COVID-19 emergency. The reevaluation resulted in a 21 percent increase in the cost of the TFP and the maximum SNAP benefit. The reevaluation was complex and involved several USDA offices. However, USDA began the reevaluation without three key project management elements in place. First, without a charter, USDA missed an opportunity to identify ways to measure project success and to set clear expectations for stakeholders. Second, USDA developed a project schedule but not a comprehensive project management plan that included certain elements, such as a plan for ensuring quality throughout the process. Third, the agency did not employ a dedicated project manager to ensure that key practices in project management were generally followed.

# USDA's Thrifty Food Plan Reevaluation Lacked Key Project Management Elements Project manager Ensures effective integration of processes, knowledge, and people Project management

Ensures common understanding of roles and goals

Provides detailed roadmap for quality management and other goals

plan

Source: GAO analysis of "A Guide to the Project Management Body of Knowledge." | GAO-23-105450

USDA gathered external input, but given time constraints, did not fully incorporate this input in its reevaluation. Specifically, USDA substituted a limited internal review of the TFP report for the formal peer review it had initially planned. This review was conducted by USDA officials who had been involved in the TFP reevaluation, and therefore were not independent. The TFP report lacked a comprehensive, external peer review to assess the transparency, clarity, or interpretation of the results. As a result, the review also did not meet relevant Office of Management and Budget (OMB) and USDA guidelines, such as the requirement to publish a report with the results of a peer review.

The complexity of the economic model USDA uses to calculate the TFP led officials to make numerous methodological and policy decisions during the 2021 reevaluation, as they had in past reevaluations. However, GAO found that key decisions did not fully meet standards for economic analysis, primarily due to failure to fully disclose the rationale for decisions, insufficient analysis of the effects of decisions, and lack of documentation. As a result, members of the public and policymakers reading the TFP report may not understand the rationale for decisions made by USDA officials, and external parties would face difficulties reproducing the TFP, which further decreases transparency and accountability.

\_ United States Government Accountability Office