

President Biden **UNILATERALLY AND UNLAWFULLY** Increased Food Stamp Benefits



MAY 8, 2023

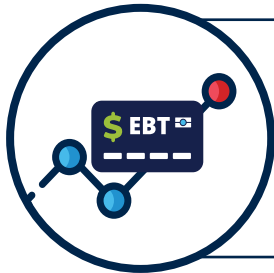
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KEY FINDINGS



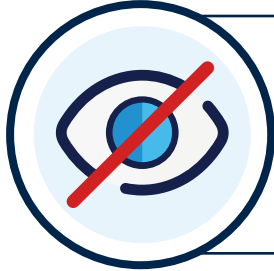
THE BIDEN ADMINISTRATION UNILATERALLY RUSHED THROUGH **THE LARGEST PERMANENT INCREASE IN FOOD STAMP SPENDING IN AMERICAN HISTORY** BY ADJUSTING THE THRIFTY FOOD PLAN.



DEPUTY UNDER SECRETARY STACY DEAN **FALSELY CLAIMS CONGRESS "DIRECTED" THE ADMINISTRATION** TO IMPLEMENT THE \$250 BILLION SPENDING INCREASE.



THE U.S. DEPARTMENT OF AGRICULTURE (USDA) **COOKED THE BOOKS AND VIOLATED FEDERAL GUIDELINES AND STANDARDS** IN ITS RUSH TO EXPAND WELFARE.



USDA'S RUSHED THRIFTY FOOD PLAN UPDATE CREATED A BLACK-BOX METHODOLOGY THAT WAS **NON-TRANSPARENT AND FUELED BY SUBJECTIVE ADJUSTMENTS** MADE BY USDA OFFICIALS.



THE BIDEN ADMINISTRATION VIOLATED **THE LAW** BY IMPLEMENTING ITS FOOD STAMP EXPANSION WITHOUT CONGRESSIONAL REVIEW.

THE BOTTOM LINE:

CONGRESS SHOULD REQUIRE ALL COSTLY EXECUTIVE ACTIONS TO RECEIVE CONGRESSIONAL APPROVAL BEFORE IMPLEMENTATION.

Overview

In 2021, USDA rushed through the largest permanent increase in food stamp benefits since the program was created.¹ This welfare expansion hiked benefits by 27 percent, fulfilling a longtime goal of Stacy Dean, President Biden's appointed Deputy Under Secretary for USDA's Food, Nutrition, and Consumer Services.² Ms. Dean and her team at USDA violated internal control standards, cancelled formal peer-review processes, and even ignored USDA's chief economist.³⁻⁴

This unlawful expansion will cost taxpayers up to \$250 billion over the next decade and sets a dangerous precedent of allowing the executive branch to bypass Congress and unilaterally impose massive welfare expansions without proper legislative approval and oversight.⁵ Congress should rein in these abuses and require all costly executive actions to receive congressional approval before implementation.



**IN 2021, USDA RUSHED THROUGH THE LARGEST
PERMANENT INCREASE IN FOOD STAMP
BENEFITS SINCE THE PROGRAM WAS CREATED.**

USDA's Deputy Under Secretary has long advocated for expanding food stamps

On his first day in office, President Biden appointed Stacy Dean to serve as Deputy Under Secretary for USDA's Food, Nutrition, and Consumer Services, the agency that oversees the food stamp program.⁶ In 2022, he nominated her for promotion to Under Secretary, though she has yet to be confirmed by the U.S. Senate.⁷⁻¹⁰ Before her appointment, she worked in the Clinton administration and at the far-left Center on Budget and Policy Priorities (CBPP), where she spent years lobbying for food stamp expansions.¹¹⁻¹³

While at CBPP, Ms. Dean actively pushed proposals to increase food stamp benefits, including through changes to the Thrifty Food Plan.¹⁴ In 2017, for example, she testified before Congress that the food stamp benefit is "not sufficient" and cited research on the impact of increasing food stamp allotments by 20 percent or more.¹⁵ She also testified in support of a plan to abandon the Thrifty Food Plan altogether for another USDA-developed plan—the Low-Cost Food Plan—which she said would "put more nutritious, healthy diets within reach" of food stamp enrollees.¹⁶⁻¹⁷



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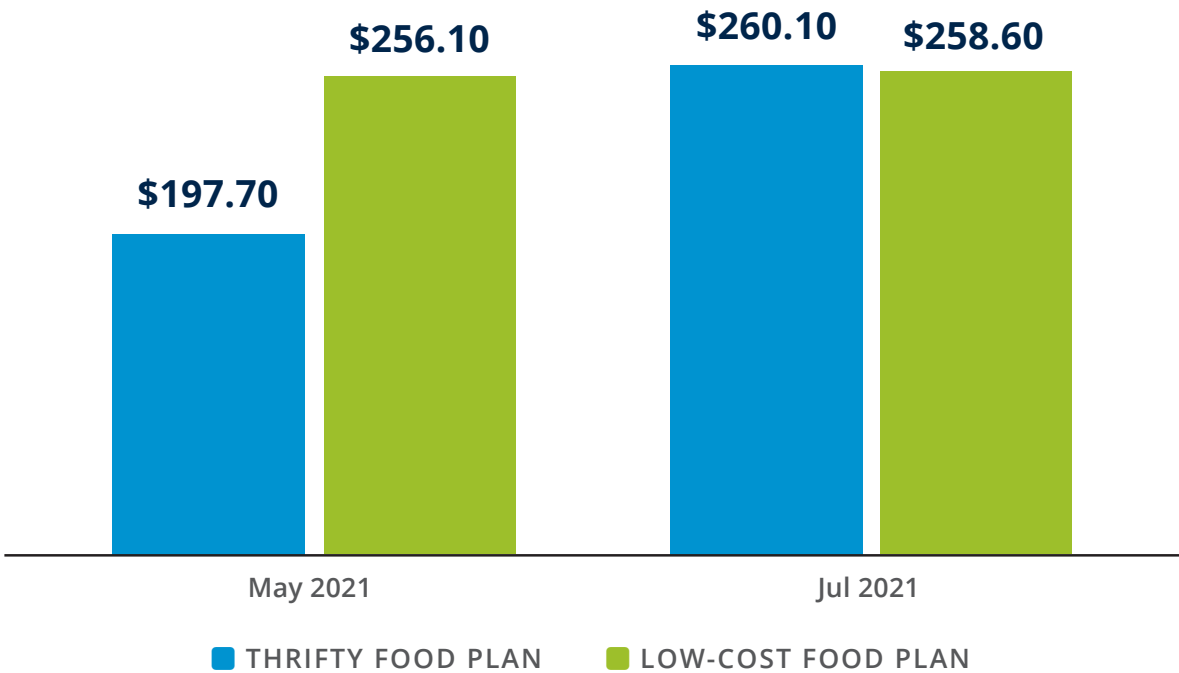
USDA unilaterally hiked food stamp benefits by 27 percent

Having failed to get congressional approval to increase food stamp benefits, Ms. Dean and other Biden administration officials moved forward with unilaterally expanding the program through a backdoor: reevaluating the Thrifty Food Plan. Ms. Dean served as the senior executive on this project.¹⁸ **Ultimately, this pet project turned into the single largest food stamp expansion in the history of the program, expanding benefits by an average of 27 percent.**¹⁹ This expansion will cost taxpayers up to \$250 billion over the next decade, assuming bureaucrats do not unilaterally and unlawfully expand benefits again during the next reevaluation.²⁰

Although Congress rejected the proposal to abandon the Thrifty Food Plan and base food stamp benefits on the Low-Cost Food Plan, USDA moved forward to essentially do just that. In May 2021, just before the reevaluation was finalized, the Thrifty Food Plan for an able-bodied male cost roughly 77 percent of the Low-Cost Food Plan.²¹ But after the reevaluation, the Thrifty Food Plan for an able-bodied male was hiked to cost even more than the Low-Cost Food Plan.²²⁻²⁴

THRIFTY FOOD PLAN COSTS NOW EXCEED LOW-COST FOOD PLAN FOR ABLE-BODIED MEN

Monthly cost of Thrifty Food Plan and Low-Cost Food Plan for men ages 20-50 between May and July 2021



Source: U.S. Department of Agriculture

USDA falsely claims it was “directed” to implement the largest permanent food stamp increase in the nation’s history

Ms. Dean has repeatedly claimed in congressional testimony that this unilateral expansion was “based on Congress’s directive” that USDA reevaluate the Thrifty Food Plan.²⁵⁻²⁶ However, Congress never directed USDA to expand the program without approval or abandon its 45-year policy of cost neutrality.

When Congress enacted the 2018 Farm Bill, it required USDA to periodically reevaluate the Thrifty Food Plan on a set schedule rather than on an ad hoc basis at USDA’s discretion.²⁷ These schedule reevaluations were required to update the plan’s contents based on food prices, food composition data, consumption patterns, and dietary guidance—the same factors used in every reevaluation of the Thrifty Food Plan since it was first created.²⁸⁻²⁹ But as Stacy Dean admitted under questioning from the U.S. Senate Committee on Agriculture, this “directive” did not include instructions to reevaluate the plan’s cost, increase food stamp benefits, or abandon USDA’s longstanding cost neutrality policy.³⁰



When Congress enacted the 2018 Farm Bill, it required USDA to periodically reevaluate the Thrifty Food Plan on a set schedule rather than on an ad hoc basis at USDA’s discretion.



Indeed, when Congress was considering the 2018 Farm Bill, the Congressional Budget Office (CBO) scored the Thrifty Food Plan update to cost nothing.³¹⁻³⁵ The estimated cost of USDA’s alleged “congressional directive” to increase food stamp benefits appeared in no official budget analyses of the Farm Bill or any subsequent appropriations act. Just days before USDA increased the Thrifty Food Plan, CBO estimated only small changes to the Thrifty Food Plan based entirely on inflationary adjustments.³⁶

Worse yet, this alleged “congressional directive” can be found in none of USDA’s budget requests made since the 2018 Farm Bill was signed into law.³⁷⁻³⁹ In President Biden’s 2022 budget proposal, USDA estimated that food stamp spending would decline by more than 8.4 percent in 2022 due to the expiration of temporary pandemic-era increases in average benefits.⁴⁰ USDA did not mention any offsetting increase in benefits from updating the Thrifty Food Plan in these budget requests.⁴¹ **Despite its estimate that food stamp spending would decline in fiscal year 2022, actual spending spiked to nearly \$120 billion, largely due to USDA’s unilateral and unlawful food stamp expansion.**⁴²

When pressed on the decision to abandon the cost neutrality requirement, USDA lawyers told auditors at the Government Accountability Office (GAO) that the cost neutrality requirement was an “administrative decision made by the Secretary of Agriculture, not a legal requirement.”⁴³ USDA lawyers did not contend, as Ms. Dean now does, that the 2018 Farm Bill “directed” the agency to abandon this cost neutrality requirement.

USDA cooked the books to expand welfare benefits

For 45 years, USDA used a “quadratic mathematical optimization programming model” to produce, evaluate, and update the Thrifty Food Plan.⁴⁴ The underlying mathematical models required these updates to be constrained to the inflation-adjusted cost to prior Thrifty Food Plan market baskets, keeping the purchasing power of the Thrifty Food Plan constant over time.⁴⁵ At the direction of Ms. Dean and others in USDA leadership, this mathematical model was altered to abandon the longstanding cost-neutrality requirement.⁴⁶



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As GAO auditors uncovered, senior USDA officials decided early in the process—before identifying potential changes to the cost of the Thrifty Food Plan—to abandon cost-neutrality requirements and sought legal justifications from internal lawyers to support cost increases.⁴⁷ Although USDA had already established an expedited timeline to reevaluate the plan, senior USDA officials accelerated that timeline months ahead of schedule.⁴⁸ Internal records reveal that the acceleration was so that USDA could apply the food stamp benefit increase on October 1, 2021, coinciding with the expiration of temporary pandemic-era increases in average benefits.⁴⁹

Despite Ms. Dean’s repeated assertion that the Thrifty Food Plan update was a “scientific and data-driven approach,” GAO auditors revealed that the reevaluation team “made adjustments to the constraints and to the data inputs” in the underlying model.⁵⁰⁻⁵¹ USDA officials claimed these adjustments were “made at the discretion of the reevaluation team.”⁵² GAO auditors also revealed that senior officials weighed in on various methodological assumptions because those assumptions “affected [food stamp] benefit levels.”⁵³



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USDA violated project management guidelines to achieve its desired outcome

Ms. Dean and other senior USDA officials did not merely abandon longstanding cost neutrality requirements but also violated multiple internal guidelines in their rush to implement the largest permanent food stamp expansion in the nation's history.⁵⁴ Although Ms. Dean has repeatedly told Congress that the reevaluation was built on an "evidence-based process," the reality is that USDA officials ignored established protocols to achieve their desired outcome of expanding welfare benefits.

Senior USDA officials cut corners and ignored best practices and internal guidelines. For example, the amount of time scheduled for data analysis was cut by nearly 70 percent to meet the accelerated timeline.⁵⁵ A recent GAO audit revealed that USDA began the reevaluation without key project management elements, including a project charter, a comprehensive project management plan, or even a dedicated project manager.⁵⁶ USDA also failed to conduct any risk assessment or risk management planning, even for fundamental risks like computational errors, despite federal internal control standards requiring agencies to conduct such assessments.⁵⁷



USDA violated review guidelines in its rush to expand welfare benefits

Although USDA initially planned to review existing scientific literature to inform its data analysis and methodology, senior officials demanded an expedited timeline before such reviews could occur.⁵⁸ USDA officials later confirmed to GAO auditors that the handful of "rapid reviews" and "evidence scans" that were ultimately produced came only after the team began recalculating the Thrifty Food Plan and were not directly used in the reevaluation process at all.⁵⁹

USDA officials also cancelled the agency's plans for peer review of the reevaluation, contrary to internal guidelines and requirements.⁶⁰ GAO's review of internal documents and interviews with USDA staff concluded that these reviews were cancelled when USDA officials realized that "they did not have time" for peer review if they were to meet the accelerated deadline for expanding benefits.⁶¹ Rather than follow its peer review guidelines, USDA relied on a handful of internal reviews, with reviewers including those who had developed the new methodologies.⁶² But even those internal reviews were limited to a single section of the reevaluation, with USDA blocking them from seeing the full report or results before publication.⁶³

USDA violated economic analysis guidelines as it pushed through its massive food stamp increase

USDA also violated nearly a dozen federal standards for economic analysis. In 2022, GAO auditors identified and reviewed 11 significant decisions made by USDA in its Thrifty Food Plan reevaluation.⁶⁴ GAO's evaluation concluded that USDA officials failed to meet federal economic analysis standards on every one of those 11 decisions.⁶⁵ USDA failed to produce economic impact analyses, analyses of alternatives, or document rationales for various key decisions, including the decisions to change the underlying equation for calculating the Thrifty Food Plan, remove cost constraints, change "optimal" consumption measures, and more.⁶⁶

Worse yet, the reevaluation team failed to consult USDA's chief economist or any of his staff on any major decisions made during the reevaluation process.⁶⁷ According to official records, USDA's Office of the Chief Economist was "not asked to review any information related to the 2021 Thrifty Food Plan" update.⁶⁸



Worse yet, the reevaluation team failed to consult USDA's chief economist or any of his staff on any major decisions made during the reevaluation process.



Ultimately, USDA's rushed Thrifty Food Plan update created a black-box methodology that was non-transparent and fueled by subjective adjustments made by USDA officials. This lack of transparency and adherence to internal guidelines raises serious concerns about the integrity of the reevaluation process and calls into question the validity of its results.

USDA's black-box model is not transparent and cannot be replicated

USDA not only failed to follow its internal guidelines on project management, peer review, and economic analysis but also suppressed key data from the public, making it impossible for other researchers to replicate its results.⁶⁹ GAO auditors recently revealed that USDA did not publish the information necessary to reproduce the market baskets that underly the model, the computer program code used to calculate those baskets, the alterations made to the underlying data, or the adjustments to the model.⁷⁰

Defending its lack of transparency, USDA officials insisted to GAO auditors that two other researchers had "successfully reproduced" the Thrifty Food Plan update.⁷¹ But an interview with one of those researchers revealed that even after receiving non-public data from USDA, they were unable to "reproduce any part of the calculation done by USDA in 2021."⁷²

USDA violated the law by failing to submit its food stamp expansion for congressional review

Federal law requires agencies to submit reports on proposed rule changes to Congress and GAO before they become effective.⁷³ These reports must be filed not just on formal regulations, but on any agency statement “designed to implement, interpret, or prescribe law or policy.”⁷⁴ Once such reports are submitted, Congress may review and vote to disapprove the proposed changes within a certain time frame under the Congressional Review Act (CRA).⁷⁵



**FEDERAL LAW REQUIRES AGENCIES TO SUBMIT
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Despite its statutory obligation, USDA failed to submit its Thrifty Food Plan update to Congress for review or the public for notice and comment.⁷⁶ Worse yet, USDA unlawfully implemented the change before Congress could review and vote on it.⁷⁷ By the time GAO was able to review the matter in July 2022, USDA had already paid out billions of dollars in benefit increases.⁷⁸ To rein in these abuses, lawmakers must reassert their authority and require all costly executive actions to receive congressional approval before implementation.

THE BOTTOM LINE: Congress should require all costly executive actions to receive congressional approval before implementation.

Unlawfully implementing costly executive actions without congressional approval has become the modus operandi for the Biden administration.⁷⁹ This reckless approach extends far beyond unilaterally increasing food stamp benefits, as seen with the student loan bailout and other administrative policies.⁸⁰ Congress should require all costly executive actions to receive congressional approval before implementation to curb these abuses.

While these costly executive actions are subject to disapproval under the CRA, the Biden administration’s decision to implement changes without congressional review effectively nullifies Congress’s ability to prevent or delay harmful policies from taking effect. GAO’s determination that the Thrifty Food Plan update was subject to the CRA, for example, came nearly a year—346 days—after USDA had published the changes.⁸¹ GAO’s determination that the student loan bailout was subject to the CRA came nearly seven months after the debt cancellation had been announced.⁸² This delay renders the CRA—which was designed to give Congress meaningful oversight over executive branch rulemaking—all but useless in reining in costly abuses.

Congress must take affirmative steps to reassert its authority over the executive branch by requiring all costly executive actions to be subject to congressional approval before implementation. This approach has been successfully adopted several times at the state level, where state legislatures have imposed similar requirements on governors and executive agencies.⁸³ In Florida, for example, proposed rules that cost more than \$1 million over five years may only take effect if the legislature approves them through a bill.⁸⁴ Congress should build on these state successes and require all executive actions that impose high regulatory costs or budgetary impacts on American taxpayers to undergo the same type of review by elected representatives.

President Biden is on a record-shattering regulatory spending spree, issuing more costly regulations than any other president in modern American history.⁸⁵ Worse yet, this growing regulatory burden is contributing heavily to record-high inflation.⁸⁶ If Congress wants to tame inflation and protect Americans and small businesses from bureaucrats gone wild, it must rein in rogue regulators and require legislative approval of costly executive actions.



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