

GOOD FOOD IN THE NEIGHBORHOOD:
LOCALIZING NUTRITIOUS FOOD ACCESS

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ABSTRACT

Given contemporary changes to federal budget priorities and recent challenges to federal food access funding, this research explores the potential benefits of entrusting state-level and municipal-level policymakers with food access policy. More specifically, this research suggests that “localizing” food access has the unique benefit of not just addressing the affordability of food, but the physical accessibility of it. As observed in the previous literature and expounded upon here, food provisioning requires consideration of nutrition, physical accessibility, and financial affordability. Programs that only address one of these priorities fail to adequately help people receive the food they need. Through policy analysis and case studies, this research creates and tests a rubric for use by policymakers and researchers to assess food access programs’ ability to address multiple considerations at once. If implemented properly, the localization of food access policy will meaningfully improve on existing frameworks and systems and help more people get food.

TABLE OF CONTENTS

I. Introduction	03
II. Background and Contextualization	05
III. Definitions and Methodology	12
IV. Literature Review	20
V. Policy Interventions and Case Studies	27
VI. Recommendations and Solutions	48
VII. Conclusion	52
Appendices	54
Bibliography	58

I. INTRODUCTION

In the current political landscape of the United States, food provisioning programs are handled at various levels of government. The federal government often provides funding and oversight for programs such as the Supplemental Nutrition Assistance Program (SNAP), which are then managed by state governments. While these programs assist in making food more financially available to people, they do little to address disparities in physical access to food, and they frequently do not consider the nutritional quality of the food. Effective and successful food provisioning ought to consider all three of these factors: physical access, financial affordability, and nutrition at the same time. In order to do so, this research surveys the current food policy landscape to understand how policy and economic levers contribute to food access. Specifically, it examines how an intentional pivot from federal to state-level and municipal-level decision-making may improve food access. It measures this through the lenses of the nutrition of the food, the physical accessibility of the food, and the financial affordability of the food.

This research deploys a mixed-methods comparative policy analysis. Through combining data on food accessibility and affordability, case studies of different policy and economic levers, and evidence on the outcomes of localized policymaking, this research systematically analyzes different policy interventions. In doing so, this research determines the need for and establishes a rubric that can assess different policy interventions with objective criteria. As demonstrated by its application to numerous case studies, policymakers and researchers are able and encouraged to apply it to policy suggestions or program proposals in their own local contexts. This rubric is intended to serve as a tool

capable of generating recommendations for where and how local governments ought to allocate resources and political capital.

Food insecurity remains an economic and public health issue. Without food, performance in educational institutions,¹ jobs,² and overall civic engagement decreases.³ Without adequate nutritious food, some of the most common chronic conditions such as obesity and heart disease increase in prevalence.⁴ As the preliminary findings suggest, localizing food policy decisions improves access to and affordability of nutritious food.

This research determines that the best way to improve access to and affordability of nutritious food is at the municipal level. Whereas federal policy can often only target either accessibility or affordability, local policy levers and community partnerships and collaboration seen at the state and city levels can address both issues simultaneously. This research focuses on the unique ability of local governments to bundle these issues in policy solutions. While no one-size-fits-all solution exists to the issue of food access, a combination of policies targeting price mechanisms, physical supply, and urban food infrastructure appear promising. Thus, the provision of good food requires the strategic localization of food policy.

¹ Centers for Disease Control and Prevention, “Nutrition Education,” School Nutrition, July 2024, <https://www.cdc.gov/school-nutrition/education/index.html>.

² Lena Voss, “How Food Affects Your Productivity (& What You Can Do About It),” NutritionED, March 5, 2026, <https://www.nutritioned.org/food-effects-productivity/>.

³ Lowcountry Food Bank, “Social Determinants of Health: The Link Between Civic Engagement and Food Security,” January 30, 2025, <https://lowcountryfoodbank.org/social-determinants-of-health-the-link-between-civic-engagement-and-food-security/>.

⁴ Amritpal Bains and M. A. Rashid, “Junk Food and Heart Disease: The Missing Tooth,” *Journal of the Royal Society of Medicine* 106, no. 12 (2013): 472–73, <https://pmc.ncbi.nlm.nih.gov/articles/PMC3842860/>.

II. BACKGROUND AND CONTEXTUALIZATION

According to the U.S. Department of Agriculture's Economic Research Service, “13.5 percent (18.0 million) of U.S. households were food insecure at some time during 2023. The 2023 prevalence of food insecurity was statistically significantly higher than the 12.8 percent (17.0 million) in 2022.”⁵⁶ The current literature on food security and access discusses three distinct but connected issues: physical accessibility, financial affordability, and nutritional quality. While existing research has gone to great lengths to measure and discuss these access issues, they are often treated as separate, siloed issues. As it relates to policy analysis, very few proposals or papers have sought to combine their discussion. To improve outcomes for all and decrease the prevalence of food insecurity, they must all be accounted for. First, there are food swamps⁷—places in which unhealthy food options outnumber and sometimes even eliminate healthy options. Food may be available, but it is not nutritious. Second, there are food deserts⁸—places in which there is a lack of physical access to food. While research suggests their prevalence has decreased, food deserts remain an area of concern. Finally, there are food mirages⁹—places in which communities may have

⁵ Economic Research Service, U.S. Department of Agriculture, “Food Security in the U.S. — Key Statistics & Graphics,” webpage, accessed November, 2025, <https://www.ers.usda.gov/topics/food-nutrition-assistance/food-security-in-the-us/key-statistics-graphics>

⁶ For a visual representation of recent national food-security trends, see Appendix 2.

⁷ Kristen Cooksey-Stowers, Marlene Schwartz, and Kelly Brownell, “Food Swamps Predict Obesity Rates Better than Food Deserts in the United States,” *International Journal of Environmental Research and Public Health* 14, no. 11 (2017): 1366, <https://doi.org/10.3390/ijerph14111366>

⁸ Allison Karpyn et al., “The Changing Landscape of Food Deserts,” *UNSCN Nutrition* 44 (2019): 46–53, <https://pmc.ncbi.nlm.nih.gov/articles/PMC7299236/>

⁹ Bethany Breyer and Andrea Voss-Andreae, “Food Mirages: Geographic and Economic Barriers to Healthful Food Access in Portland, Oregon,” *Health & Place* 24 (2013): 131–139, <https://doi.org/10.1016/j.healthplace.2013.07.008>

physical access to nutritious food, but it is financially unaffordable to many people who need it. Without addressing all of these issues adequately and simultaneously, people are effectively still without true access to good food.

An important piece of contextual framing is the longstanding role the government has played in food provisioning, beginning formally with the Food and Drugs Act of 1906. Inspired in part by Upton Sinclair's *The Jungle* and similar muckraking of the decade, public pressure was building to stop the newly-exposed dangerous industrial practices, many of which were in the food industry. Following the Spanish-American War and disease outbreaks linked to spoiled food, President Roosevelt signed the Food and Drugs Act, also known as the Wiley Act after Dr. Harvey Washington Wiley, the chief chemist of the USDA Bureau of Chemistry who led a campaign against dangerous food additives. The law "prohibited the adulteration of food by the removal of valuable constituents, the substitution of ingredients so as to reduce quality, the addition of deleterious ingredients, and the use of spoiled animal and vegetable products. Making false or misleading label statements regarding a food or a drug constituted misbranding."¹⁰ This was only the start of over a century of increasing food regulation in both scope and scale.

The Food, Drugs, Cosmetic Act of 1938 for instance set standards for food packaging and ingredient quality, and created stricter enforcement mechanisms. It also allowed for factory inspections and the regulation of interstate trade with these food items. In the 1950s, "the Food Additives Amendment [was] enacted, requiring manufacturers of new

¹⁰ James Harvey Young, "The Long Struggle for the Law," U.S. Food and Drug Administration, February 6, 2018, <https://www.fda.gov/about-fda/changes-science-law-and-regulatory-authorities/long-struggle-law>.

food additives to establish safety. The Delaney proviso prohibits the approval of any food additive shown to induce cancer in humans or animals. FDA publishes in the Federal Register the first list of substances generally recognized as safe (GRAS). The list contains nearly 200 substances.”¹¹ A subsequent series of amendments was passed that again increased the level at which the FDA and the USDA would continue to regulate food, and would expand their authority in maintaining and building health standards into it. For the purposes of this research, this history establishes precedent for the government’s concern about and intervention in the quality of food. The following decades saw a gradual expansion of powers and amendments made until the 1990 Nutrition Labeling and Education Act, which significantly changed the way nutrition labels were displayed, and set forth standards for how nutritional content could be represented on consumer food labels.

In parallel to the expansion of the government’s role in regulating food was the growth of the government’s role in providing it. While some trace its origins to 1800s farm surplus support, the precursor to programs such as SNAP began in 1939. As the Food and Nutrition Service of the USDA explains, “The idea for the first Food Stamp Program (FSP) is credited to various people, most notably Secretary of Agriculture Henry Wallace and the program’s first Administrator Milo Perkins. The program operated by permitting people on relief to buy orange stamps equal to their normal food expenditures. For every \$1 worth of orange stamps purchased, 50 cents worth of blue stamps were received. Orange stamps

¹¹ Ibid

could be used to buy any food. Blue stamps could only be used to buy food determined by the Department to be surplus.”¹²

After the expiration of the original food stamp program, pilot programs and limited-scale legislation were introduced. This changed with President Johnson and the Food Stamp Act of 1964, which made the program permanent and formalized how it would work. As explained, “[The Act] required a state plan of operation and development of eligibility standards by states ... recipients purchase their food stamps, paying an amount commensurate ... to obtain a low-cost nutritionally adequate diet; Established eligibility for purchased with food stamps of all items intended for human consumption except alcoholic beverages and imported foods ... Divided responsibilities between states (certification and issuance) and the federal government (funding of benefits and authorization of retailers and wholesalers), with shared responsibility for funding costs of administration.”¹³ This Act arguably opened the possibility of localizing food policy, and in fact began that work.

As the program expanded, its eligibility and benefits ebbed and flowed with changes in presidential administration and legislative leadership. The Food Stamp Act Amendment of 1970 implemented work requirements but also set a limit to how much households would be responsible for purchasing. The Agriculture and Consumer Protection Act of 1973 expanded access eligibility in the event of disasters and to people in recovery from substance abuse. In the following few years, Republicans and Democrats both looked to modify food provisioning requirements and expectations under the Act and introduced

¹² U.S. Department of Agriculture, Food and Nutrition Service, “A Short History of SNAP,” accessed April 26, 2026, <https://www.fns.usda.gov/snap/history#1939>.

¹³ Ibid

their own bills. As told, “the Republican bill stressed targeting benefits to the neediest, simplifying administration, and tightening controls on the program. The Democratic bill focused on increasing access to those most in need, while simplifying and streamlining a complicated and cumbersome process that delayed benefit delivery as well as reducing errors and curbing abuse.”¹⁴ The resulting Food and Agriculture Act of 1977 established categorical eligibility standards and universal income and deduction guidelines to be used in assessing eligibility. It encouraged stores to provide more staple foods and ensured people would not need to purchase their way into the program as was required before.

Budget cutbacks in the 1980s prohibited the use of funds for outreach and program advertising, and further expanded the work or training requirement for eligibility. However, this was quickly met with more recognition of the issue of food insecurity. As explained, “recognition of the severe domestic hunger problem in the latter half of the 1980s led to incremental improvements in the FSP in 1985 and 1987, such as elimination of sales tax on food stamp purchases, reinstitution of categorical eligibility, increased resource limit for most households (\$2,000), eligibility for the homeless, and expanded nutrition education.”¹⁵ This expansion of benefits and the focus on nutrition education is essential to contemporary policy proposals that focus on nutrition or education as a solution.

The final significant expansion of benefits occurred under the 2008 Farm Bill. As told, “The 2008 Farm Bill (The Food, Conservation, and Energy Act of 2008) (PL 110–234) ... increased the commitment to federal food assistance programs by more than \$10 billion over the next 10 years ... changed the name of the federal program to the Supplemental

¹⁴ Ibid

¹⁵ Ibid

Nutrition Assistance Program or SNAP ... institutionalized priorities that FNS had focused on for many years including strengthening integrity, simplifying administration, maintaining state flexibility, improving health through nutrition education, and improving access.”¹⁶ This timeline has ebbed and flowed with changes in political administration and economic situation.¹⁷

This past summer saw some challenges to SNAP and the surrounding food access legislation. Federal budgetary and policy ideals have shifted under the recent presidential administration, resulting in federal funding cuts and eligibility changes to food access programs. Presumably, this means that some people currently relying on SNAP funding may lose access to the program and its food provisioning benefits.¹⁸ The Department of Agriculture, which exercises the majority of jurisdiction on food policy and provisioning, has expressed a desire to downsize and redistribute a significant portion of its provisioning duties to state governments. While this research began prior to those decisions and with a more theoretical frame, it evolved into a policy-focused one in light of the changing political climate. Regardless of whether it is the federal, state, or local government that bears the burden of food assistance, food remains a necessity of life, and access to nutritious food benefits educational and vocational performance.¹⁹ In this regard, some form of investment

¹⁶ Ibid

¹⁷ As such, a visual timeline of the major food regulation, food assistance, and local food access programs discussed in this research is included in Appendix 1.

¹⁸ Center on Budget and Policy Priorities, “Many Low-Income People Will Soon Begin to Lose Food Assistance Under Republican Megabill,” September 2025, <https://www.cbpp.org/research/food-assistance/many-low-income-people-will-soon-begin-to-lose-food-assistance-under>.

¹⁹ Healthy Schools, Centers for Disease Control and Prevention, “Dietary Behavior and Academic Grades,” accessed December 2025, <https://www.cdc.gov/healthy-schools/health-academics/diet-grades.html>.

in nutritious food access appears to be worthwhile. Given the priorities of the current administration, it is worthwhile to explore the ways in which and to what extent that local governments can play a role in filling these gaps and perhaps expanding food access.

Given the current political economy and policy landscape, this research analyzes different policy mechanisms that state-level and municipal-level governments can enact and adopt to improve access to nutritious food. It also examines the challenges and unique contexts faced by these different local governments.²⁰ Instead of a theoretical framing of what federal policy ought to look like, the intent here is to demonstrate the feasibility, promise, and potential concerns of moving food access policy to the local level.

In doing so, it addresses a notable gap in the literature. Many food insecurity papers and policy proposals take into account only one of the three issues: food swamps, deserts, or mirages. In doing so, some considerations of either physical accessibility, financial affordability, or health content are neglected. Even if people have physical access, they may not be able to purchase the food. Even if they have financial capacity, they may not be able to find the food. By bridging these issue areas and considering approaches that address more than one form of a food insecure environment, this research goes further than similar papers in suggesting meaningful, viable policy. Thus, the hope is to fill that research gap by focusing on solutions that can work towards solving both accessibility and affordability.

²⁰ For a visual representation of the differences in food insecurity by state, see Appendix 3.

III. DEFINITIONS AND METHODOLOGY

A. Definitions of Key Terminology

To discuss the current food policy landscape and ensure precision in proposed solutions, this paper adopts the following definitions. In the literature review, there is a more in-depth explanation as to why these specific phrases emerged and why they were chosen over similar terminology or definitions.

- **Low food security:** “reports of reduced quality, variety, or desirability of diet. Little or no indication of reduced food intake.”
- **Very low food security:** “reports of multiple indications of disrupted eating patterns and reduced food intake.”
- **Nutritious food:** “A food must contain a certain amount of a food group like fruits, vegetables, grains, protein foods, or dairy. A food can’t contain too much saturated fat, sodium, or added sugars.”
- **Food desert:** “Low-income census tracts with a substantial number or share of residents with low levels of access to retail outlets selling healthy and affordable foods”
 - For the sake of this paper, food deserts exist when there is no physical access to food.
- **Food swamp:** “areas with a high-density of establishments selling high-calorie fast food and junk food, relative to healthier food options”

- For the sake of this paper, food swamps exist when there is not nutritious food present in an area.
- **Food mirage:** “grocery stores are plentiful but prices are beyond the means of low-income households, making them functionally equivalent to food deserts”
 - For the sake of this paper, food mirages exist when there is not financially affordable food in an area.

B. Rationale and Process

Methodologically, this research began with significant effort on definition-setting and boundary-drawing. For instance, the distinction between “food access” and “nutritious food access” needed to be delineated to address the concern of food swamps. Then, issues of both affordability, seen in food mirages, and accessibility, seen in food deserts, were uncovered as the two primary problems preventing more people from accessing nutritious food. By looking simultaneously at swamps, mirages, and deserts, the unique positioning of local government and local policymakers to address these issues became evident. While the federal government can provide funding and lower costs, it cannot easily do things like change zoning ordinances or distribute fresh produce. Only state-level and municipal-level governments appear to be able to address all three. Once the framing was completed, it was necessary to move on to the policy components.

This research serves primarily as a comparative analysis of different policy approaches to improving food provisioning. To address a gap in the literature, these are

examined through the lens and in the context of state-level and municipal governments and their power as opposed to federal lawmaking and national legislation. A universal “rubric” was created to aid this process and provide unified standards. Through the rubric’s assessment of accessibility, affordability, and nutrition, policies can be rated and sorted into a “recommended” or “not recommended” distinction. While every policy and case study is only relevant to a specific context and will not work in exactly the same way if transplanted elsewhere, the idea is that policies meeting multiple criteria are most likely to provide benefit in multiple different contexts. The goal in assembling the specific case studies analyzed was to find a variety of different cities and states, and their approaches to food policy. They represent different geographic, social, economic, and political realities. Yet, across many of them there is evidence of success.

Through the rubric and analysis of selected location-based and policy-based case studies, a recommended policy menu will be offered with the suggested best ones to implement. It is important to add the disclaimer that there is no universal solution to food access and affordability, but through a combination of local policy levers and choices, outcomes can most likely improve.

C. Creation of a Rubric

The rubric below is the result of researching the various issues of food access, namely those that occur in food deserts, food mirages, and food swamps. By considering all three issues: physical accessibility, financial affordability, and nutritional value simultaneously, the rubric allows for its users to “grade” policy outcomes on these criteria.

It is suggested that a program is only beneficial if it at least meets two of these three considerations. Programs that merely address one of the three issue categories are viewed as unfavorable, even if they may help in that area. As justified in the literature and the policy analysis, those programs are most susceptible to political or economic pressures drastically reshaping or removing them, and thus, are not as potent of solutions.

Meanwhile, policies or programs that meet at least two of the three criteria are considered to be viable in their own context and recommended as useful policies. While it is cautioned against assuming programs can be transplanted to new environments and work to the same level of success, those programs are more likely to have features that could be replicated. The resulting rubric is visualized below.

PHYSICAL: Does this intervention improve one's physical ability to access food either by bringing food closer to people or people closer to food? 1/3: A one in this category means it does not improve the physical accessibility of food. 2/3: A two in this category means it partially improves the physical accessibility of food (indirectly or with limitations). 3/3: A three in this category means it meaningfully improves the physical accessibility of food.	SCORE ___/3
FINANCIAL: Does this intervention improve one's financial ability to	SCORE

afford food either by making food cheaper or providing people with extra buying power? 1/3: A one in this category means it does not improve the financial affordability of food. 2/3: A two in this category means it partially improves the financial affordability of food (indirectly or with limitations). 3/3: A three in this category means it meaningfully improves the financial affordability of food.	___/3
NUTRITIONAL: Does this intervention improve the health content of the food one is provided either by prioritizing healthy food or enhancing the health of food provided? 1/3: A one in this category means it does not improve the nutritional quality of food. 2/3: A two in this category means it partially improves the nutritional quality of food (indirectly or with limitations). 3/3: A three in this category means it meaningfully improves the nutritional quality of food.	SCORE ___/3
TOTAL SCORE	___/9

1-4/9: A score in this range fails to adequately address the threefold problems of nutritious food access. Proposals in this range are not recommended. 5-7/9: A score in this range addresses some but not all of the problems of nutritious food access. Proposals in this range may be recommended, but if and only if they address at least two areas of concern. Even then, they are recommended in specific contexts or in tandem with other programs. 8-9/9: A score in this range meaningfully addresses multiple problems of nutritious food access. Proposals in this range are recommended, but may still benefit from being paired with other programs.	
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The following mock programs are provided and analyzed across this rubric to provide examples of what programs may look like.

MOCK PROGRAM A: Free Balanced Meal Delivery

In this program, the city has sufficient funding and mastered the production and distribution of nutritious food. They hand deliver daily meals that meet dietary guidelines on macro and micronutrients to all residents of the area for free.

PHYSICAL	3/3
FINANCIAL	3/3
NUTRITIONAL	3/3
TOTAL SCORE	9/9
This program addresses all of the physical, financial, and nutritional considerations. As it helps with all three concerns, it is recommended.	

MOCK PROGRAM B: Meal Delivery Service

In this program, the city has mastered the production and distribution of somewhat nutritious food. They hand deliver daily meals that meet some guidelines on macro and micronutrients to all residents of the area for a monthly subscription rate approximately equal to the cost of buying those ingredients separately.

PHYSICAL	3/3
FINANCIAL	1/3
NUTRITIONAL	2/3
TOTAL SCORE	6/9
This program addresses all of the physical, none of the financial, and some of the nutritional considerations. As it helps with two concerns, it is partially recommended.	

MOCK PROGRAM C: Healthy Food Stand

In this program, the city has mastered the production and distribution of nutritious food.

They operate one stand open 10am - 2pm Monday through Friday that sells daily meals that meet all of the nutritional guidelines on macro and micronutrients.

PHYSICAL	1/3
FINANCIAL	1/3
NUTRITIONAL	3/3
TOTAL SCORE	5/9
This program addresses none of the physical, none of the financial, and all of the nutritional considerations. As it only helps with one concern, it is not recommended.	

Across all of these mock programs, the physical, financial, and nutritional concerns are assessed and scored against the set rubric criteria. As an important note, one of the programs with a score in the 5-7 range was recommended and the other was not. This was able to happen because of the nuance of the rubric and the insistence on only allowing programs that help multiple issue areas to be recommended. The justification behind this rubric is that any program at least partially helping with multiple issue areas at once is already making more meaningful progress than current federal programs and policies, and thus is worth at least a partial recommendation.

IV. LITERATURE REVIEW

A. Sources on Defining the Issues

Much of the early research was focused on understanding the scope and scale of the problem. Moreover, it was about establishing standardized terminology and technical knowledge to discuss the problems of food accessibility and affordability.

Breyer and Voss-Andreae (2013)²¹ introduced the terminology of *food mirages* and the related idea that affordability is just as important as physical proximity for food access. This was pivotal in establishing the rubric and itself shaping the direction of the research. **Walker et al (2010)**²² also confirmed these claims and cautioned that an overreliance on “health stores” may turn food deserts into food mirages. Meanwhile, the **Economic Research Service of the USDA (n.d.)**²³ and **Karpyn et al (2019)**²⁴ defined *food deserts* and established the fact that while their overall prevalence is decreasing (i.e. fewer places lack nearby food retailers), low-income and rural communities are still disproportionately affected. This justified the inclusion of physical accessibility as a criterion on the rubric and an area of focus. **Hahn (2022)**²⁵ suggests that food ought to be healthy, green, fair, and affordable. In this research, healthy and affordable are measurable and relevant focal points, while “green” and “fair” fall beyond the scope of this study. The

²¹ Bethany Breyer and Andrea Voss-Andreae, “Food Mirages”

²² Renee Walker, Christopher Keane, and Jessica Burke, “Disparities and Access to Healthy Food in the United States: A Review of Food Deserts Literature,” *Health & Place* 16, no. 5 (2010): 876–884, <https://doi.org/10.1016/j.healthplace.2010.04.013>

²³ Economic Research Service, U.S. Department of Agriculture, “Food Security in the U.S.”

²⁴ Allison Karpyn et al., “The Changing Landscape of Food Deserts”

²⁵ Kristine Hahn, “Defining ‘Good Food,’” *MSU Extension*, Michigan State University, January 2022, https://www.canr.msu.edu/news/defining_good_food

Office of the FDA Commissioner (2024)²⁶ provides the best working definition of healthy foods that has been used by many other sources and throughout this research. Finally, as a response to concerns about nutritious food access, **Cooksey-Stowers et al (2017)**²⁷ introduces the premise of *food swamps* as areas that may have fast or ultra-processed food but lack nutritional food. This framework is useful for measuring the access to not just food, but healthy food in an area. As for explaining the consequences of a lack of nutritious food, many sources emerged with similar evidence. The **Healthy Schools (n.d.)** group of the CDC²⁸ and **Faught et al (2017)**²⁹ both contend that poor nutrition leads to poor academic performance and harms future job options and job performance.

Taken together, these sources on defining the problems of food deserts, food mirages, and food swamps provide the baseline criteria for the rubric and the justification for equal weighting of these categories. With only one issue addressed as is often the case with federal provisioning policy, problems in food access and health outcomes persist.

B. Sources on Policy Solutions

²⁶ Office of the Commissioner, U.S. Food and Drug Administration, “A Fresh Take on What ‘Healthy’ Means on Food Packages,” *U.S. Food and Drug Administration*, December 2024, <https://www.fda.gov/consumers/consumer-updates/fresh-take-what-healthy-means-food-packages>

²⁷ Kristen Cooksey-Stowers et al., “Food Swamps Predict Obesity Rates Better than Food Deserts in the United States”

²⁸ Healthy Schools, Centers for Disease Control and Prevention, “Dietary Behavior and Academic Grades”

²⁹ Erin Faught, Paul Williams, Noreen Willows, Maria Asbridge, and Paul Veugelers, “The Association between Food Insecurity and Academic Achievement in Canadian School-Aged Children,” *Public Health Nutrition* 20, no. 15 (2017): 2778–2785, <https://doi.org/10.1017/S1368980017001562>

Many policy answers to the problems of food access have been proposed. **Wrigley et al (2003)**³⁰ is a landmark food desert study that found that an increase in grocery stores created a significant uptick in consumption of fruits and vegetables. **French et al (2001)**³¹ is a key source in providing many strategies shown to increase consumption of healthy food. Notably, a 50% price decrease in the cost of low-fat food increased consumption by 93% even when controlled for marketing. The **Institute of Medicine and National Research Council (2009)**³² provided a significant list of policy recommendations for local governments including zoning laws to curb fast food density, discounts on healthy food items, taxes on sugary items, and more leniency with food vendors and markets.

Story et al (2008)³³ offers similar solutions but expands to discuss broader issues with U.S. food systems as a whole. They contend that current farm policies and crop subsidies have created an overproduction of crops used in unhealthy, cheap foods. They explicitly state that local governments are the ones best positioned to assist with access to nutritious food. Meanwhile, **Lucan (2019)**³⁴ throws a wrench in some of the original

³⁰ Neil Wrigley, Daniel Warm, and Barrie Margetts, "Deprivation, Diet, and Food-Retail Access: Findings from the Leeds 'Food Deserts' Study," *Environment and Planning A: Economy and Space* 35, no. 1 (2003): 151–188, <https://doi.org/10.1068/a35150>

³¹ Simone French, Mary Story, and Robert Jeffery, "Environmental Influences on Eating and Physical Activity," *Annual Review of Public Health* 22 (2001): 309–335, <https://doi.org/10.1146/annurev.publhealth.22.1.309>

³² Institute of Medicine and National Research Council, *Local Government Actions to Prevent Childhood Obesity* (Washington, DC: The National Academies Press, 2009), <https://doi.org/10.17226/12674>.

³³ Mary Story, Karen Kaphingst, Rachel Robinson-O'Brien, and Karen Glanz, "Creating Healthy Food and Eating Environments: Policy and Environmental Approaches," *Annual Review of Public Health* 29 (2008): 253–272, <https://doi.org/10.1146/annurev.publhealth.29.020907.090926>.

³⁴ Sean Lucan, "Local Food Sources to Promote Community Nutrition and Health: Storefront Businesses, Farmers' Markets, and a Case for Mobile Food Vending," *Journal of the Academy*

assumptions of the research, primarily that simply having more grocery stores will lead to better outcomes across the board and that fewer fast-food retailers will achieve the same end. It suggests that farmers markets are not often affordable to many, and that assistance to mobile food vendors may help more people with issues of accessibility and affordability. In general, it adds a lot of nuance to earlier arguments such as Wrigley et al.

C. Sources on Successful Case Studies

Different cities, counties, and localities both in the United States and internationally have taken up the management of food access initiatives to varying levels of success. Often, this is seen in either charitable food-donation based programs such as soup kitchens and food pantries, or in municipal programs such as discounts for healthy food or implementing more stringent zoning laws that prevent unhealthy eateries from opening and instead incentivize grocery stores and healthy eateries to open. However, none of these cases so far show a 100% reduction in food insecurity or appear in any way to be applicable without modification to every other context. Overall, it appears that only a combination of different methods such as the ones detailed below will prove beneficial in addressing this problem.

For a very local example, **Braun (2022)**³⁵ details a relatively new community garden initiative out of the neighborhood of Parramore, Orlando. In contrast to typical food pantries that do a lot to fight overall food insecurity by providing primarily shelf stable

of Nutrition and Dietetics 119, no. 1 (2019): 144–147,
<https://doi.org/10.1016/j.jand.2018.09.008>.

³⁵ Emily Braun, “Parramore Garden’s Influence Grows, Plants New Seed,” *Spectrum News 13*, January, 2022,
<https://mynews13.com/fl/orlando/news/2022/01/12/garden-s-influence-grows--plants-new-seed>

ingredients and processed goods,³⁶ the Parramore garden initiative provides free, fresh produce and ingredients to residents. This does a lot to provide not just food but nutritious food in a local area. In its current state, it is supported and partially funded by the City of Orlando, allowing it to expand its offerings.

Marino et al. (2024)³⁷ explores how localized, fragmented food policy works in Italy. Although the national laws and food culture diverge in many key ways, some of the takeaways of this comparative analysis may be valid in the U.S. context. For example, it is suggested that the cities with the most robust food infrastructure benefit most from local policy. It also seems to suggest that the participation and work of the residents helps with policy buy-in and implementation.

Delgado (2025)³⁸ covers a New York City case study of a restaurant that operates on a “pay-what-you-can” model. While not entirely free and only a single instance, it has so far proven successful and been able to provide food to people otherwise without financial access. This was inspired by the existence of Brazil’s Popular Restaurants initiative³⁹ that heavily subsidizes the cost of locally-grown and healthy meals to patrons. This potentially

³⁶ Ruopeng An, Jingqiang Wang, Jin Liu, Jie Shen, Emily Loehmer, and Joseph McCaffrey, “A Systematic Review of Food Pantry-Based Interventions in the USA,” *Public Health Nutrition* 22, no. 9 (2019): 1704–1716, <https://doi.org/10.1017/S1368980019000144>.

³⁷ Davide Marino, Marco Vassallo, and Valentina Cattivelli, “Urban Food Policies in Italy: Drivers, Governance, and Impacts,” *Cities* 153 (October 2024): 105257, <https://doi.org/10.1016/j.cities.2024.105257>

³⁸ Sam Delgado, “Community Kitchen Brings Food Justice to the Table,” *Civil Eats*, October, 2025, <https://civileats.com/2025/10/29/the-nations-first-public-restaurant-makes-food-justice-a-top-priority/>

³⁹ NYC Food Policy Center, “Popular Restaurants — Belo Horizonte: Urban Food Policy Snapshot,” accessed December 6, 2025, <https://www.nycfoodpolicy.org/popular-restaurants-belo-horizonte-urban-food-policy-snapshot/>

connects to the 20th century civic restaurant concept⁴⁰ of the United Kingdom in which government restaurants were operated and subsidized so as to both help local businesses and feed people for a fraction of the usual cost. Additionally, this can be seen in the existence of military commissaries⁴¹ which provide subsidized groceries and goods to eligible participants and still are able to operate on a profit.

Finally, the **Office of Disease Prevention and Health Promotion (2024)**⁴² suggests that there is a case to be made for business partnerships to create local food systems that benefit the health of residents and the local economy. Connected to other aforementioned case studies, the overall consensus seems to be that public-private partnerships are at least a part of the solution to improving access to and affordability of nutritious food.

D. Synthesis of Literature

The literature is clear that food access is an issue of financial affordability and physical accessibility as evidenced by food swamps, deserts, and mirages. Solutions providing for physical access alone (more grocery stores opening up, mobile vendors) produce mirages in which people cannot afford to eat. Solutions providing for financial

⁴⁰ Elliot Koubis, "The Public Diner: Notes on a National Food Service," The Oxford Blue, October 31, 2024, <https://theoxfordblue.co.uk/the-public-diner-notes-on-a-national-food-service>.

⁴¹ Kristy Kamarck and Barbara Salazar Torreon, *Defense Primer: Military Commissaries and Exchanges*, CRS Report IF11089 (Washington, DC: Congressional Research Service, November 21, 2024), <https://www.congress.gov/crs-product/IF11089>

⁴² Office of Disease Prevention and Health Promotion, U.S. Department of Health & Human Services, "Building Regenerative Local Food Systems to Enhance Community Health and Resilience," 2024, <https://odphp.health.gov/foodismedicine/promising-practices-and-tools/bright-spots/building-regenerative-local-food-systems-enhance-community-health-and-resilience#leveraging-local-foods-for-FIM>

affordability alone (food vouchers, discount schemes) meanwhile create deserts that preclude people without time or a means of transportation from getting the food. In either case, a lack of food of decent nutritional value may create a swamp that encourages poor health choices.

In summarizing the various case studies and proposed solutions, it is also clear that there is no universal fix to these distinct problems. Only through a combination of public-private partnerships, some solutions that bridge accessibility gaps, and others that focus on affordability gaps may better food access programs be implemented at the local level. However, it is worth noting that the literature shows promise in the policy levers of local government and its distinct ability, unlike federal government, to bundle policies to address both of these concerns at once. Thus, as the literature implies, improving access to nutritious food requires a bundled, portfolio policy approach that may best be implemented by local governments that possess more policy levers.

V. POLICY INTERVENTIONS AND CASE STUDIES

Through the research, four main categories of policy intervention were determined: SNAP-adjacent programs that offer similar funding for food purchasing at the state and sometimes municipal level, zoning regulations that improve the physical access to food for residents of a municipality, community-led programs which are sometimes financially supported by the state or municipality but operate on their own to target varying food issues in their communities, and government-run grocers which offer food at discounted prices based on certain criteria. Generally speaking, a pattern emerged in studying these programs in which good SNAP-adjacent programs helped with affordability and nutrition, good zoning regulations helped with accessibility and occasionally nutrition, good community-led programs helped with multiple categories of concern at the same time, and good government-run grocers helped with multiple categories of concern at the same time.

Below, a comprehensive but not exhaustive list of case studies is included and analyzed using the evaluative rubric. None of these programs or initiatives should be taken to be universally-replicable, but their core functions and design could be shared with various other policy interventions. If a program addresses at least two of the three areas of concern as many of the below do, they are recommended for use by local and municipal leaders. In the following section after the analysis of these exemplar cases, there is a discussion on the overall implications and a potential full suite of policies. The importance is not really any one program itself, but the use of a universal rubric to assess vastly different policy interventions and solutions to food access. Specifically, it is the use of this rubric to uniquely uncover programs that can simultaneously address concerns across

multiple categories of issue. Through use of the rubric on policy interventions beyond even the ones included below, policymakers and local governments can assess and ideally adopt solutions to issues surrounding food security.

A. SNAP-ADJACENT PROGRAMS

Case studies of this category provide either direct payment for or reimbursement/coverage of food purchased by individuals. Often, there are certain caveats and criteria (such as the need for the food to be of a certain type or grown in the state in which the program operates). As a whole, these programs do help with the financial affordability of food. For some of them, they even specifically help with nutritious food access. However, they do not themselves assist with the physical accessibility of this food. While they may help address food mirages and swamps, they cannot help with food deserts. Another important consideration on these programs is that they are the most directly tied to state-level and federal budgets and funding, and are the most susceptible to political pressure. While not explicitly covered by the rubric which assumes proper implementation and continued support, the political dependency of these programs should make policymakers cautious about long-term viability unless the program garners continued bipartisan support. Some of the programs and policy interventions in this category are detailed below, as are their rubric scores and comments.

A.1. Florida Fresh Access Bucks⁴³

⁴³ Fresh Access Bucks, “How Fresh Access Bucks Works,” accessed March 2026, <https://freshaccessbucks.com/shop-with-fab/>.

Managed by “Feeding Florida: Florida’s Food Bank Network,” the Fresh Access Bucks (FAB) program “provides a dollar-for-dollar match for fresh, Florida-grown fruits and vegetables when SNAP-eligible foods are purchased.” For every \$1 spent with SNAP/EBT in Florida, \$1 is provided that can be used to purchase fruits and vegetables grown in Florida. According to their website, over \$3.3 million in Fresh Access Bucks have been redeemed since 2013 and there has been a positive economic impact of \$6.8 million.⁴⁴ As it relates to nutrition and not just access to food, Fresh Access Bucks participants consumed an average of 2.88 cups of fruits and vegetables a day—exceeding the national average. As far as programs go, this one has existed for longer than most similar ones and has continually yielded beneficial results. The program’s reported impact data suggest the same. This program addresses two issues—financial and nutritional—simultaneously. The data thus far suggests it works in the wider Florida context.

PHYSICAL	1/3
FINANCIAL	2/3
NUTRITIONAL	3/3
TOTAL SCORE	6/9
This program addresses none of the physical, some of the financial, and many of the nutritional considerations. As it helps with two concerns, it is recommended.	

⁴⁴ For a visual representation of Florida Fresh Bucks impact, see Appendix 4.

A.2. Massachusetts Healthy Incentives Program⁴⁵

The Massachusetts Healthy Incentives Program (HIP) is similar in concept to the Florida Fresh Access Bucks but with a key difference—it is managed directly by the state government and provides direct cash/EBT transfer upon purchase. Participants are required to have at least one penny in their SNAP/EBT account and make a purchase from a participating farmer/market/vendor. Similar to Fresh Access Bucks, it addresses issues of nutrition and financial affordability, but does not itself solve issues of physical access. Unlike Florida Fresh Bucks which provides a dollar-to-dollar match, this program will provide extra money depending on household size and regardless of how much is spent via SNAP. While administered differently, it has mostly the same result as the Florida Fresh Access Bucks program in that it assists financially and nutritionally, but not physically.

PHYSICAL	1/3
FINANCIAL	3/3
NUTRITIONAL	3/3
TOTAL SCORE	7/9
This program addresses none of the physical, and many of the financial and nutritional considerations. As it meaningfully helps with two concerns, it is recommended.	

⁴⁵ Massachusetts Department of Transitional Assistance, “Massachusetts HIP Gives You Money Back When You Use Your SNAP Benefits to Buy Healthy, Local Fruits and Vegetables from HIP Farm Vendors,” accessed March 2026, <https://www.mass.gov/massachusetts-hip-gives-you-money-back-when-you-use-your-snap-benefits-to-buy-healthy-local-fruits-and-vegetables-from-hip-farm-vendors>.

A.3. New Jersey Good Food Bucks⁴⁶

Another program to highlight is New Jersey's Good Food Bucks program. This one is much more similar to Florida's Fresh Access Bucks in that it is not directly managed by the state government though the funding and some of the logistics are supported by them. Again, it is worth noting that this program itself does not solve the issue of accessibility, it helps with affordability and nutrition. This program appears to be the most limited of the three in scope and criteria, but their website indicates an interest to grow and has a form for people to request certain farms, farmers, and places accept Good Food Bucks.

PHYSICAL	1/3
FINANCIAL	2/3
NUTRITIONAL	3/3
TOTAL SCORE	6/9
This program addresses none of the physical, some of the financial, and many of the nutritional considerations. As it helps with two concerns, it is recommended.	

A.4. Schumacher Nutrition Incentive Program⁴⁷

While a federal grant program, this initiative provides a lot of the funding and financial support for state and county level SNAP-adjacent programs with an emphasis on

⁴⁶ City Green, "Good Food Bucks," accessed March 2026, <https://www.goodfoodbucks.com/>.

⁴⁷ U.S. Department of Agriculture, National Institute of Food and Agriculture, "Gus Schumacher Nutrition Incentive Program (GusNIP)," accessed March 2026, <https://www.nifa.usda.gov/grants/programs/gus-schumacher-nutrition-incentive-program-gusnip>.

nutrition. Florida Fresh Access Bucks and New Jersey Good Food Bucks are the sorts of programs incentivized by this. In the complex federal landscape, this program helps provide a semblance of financial stability for these state-level food provisioning programs. In and of itself, it does not solve the issues of affordability, accessibility, or nutrition. However, it helps fund the programs that address those concerns. As it relates to scoring on the rubric, the program does not directly impact people needing food assistance. However, its grant-giving priorities incentivize states and cities to adopt programs that target both nutrition and affordability of food. It is recommended in this different way.

PHYSICAL	1/3
FINANCIAL	2/3
NUTRITIONAL	2/3
TOTAL SCORE	5/9
This program addresses none of the physical, and some of the financial and nutritional considerations. As it indirectly helps with two concerns, it is partially recommended.	

A.5. Texas Summer Electronic Benefits Transfer⁴⁸

This program is used to demonstrate an implementation failure that occurs at the state level due to political decisions. The \$60 million proposal “would have given qualifying families \$120 per child to pay for lunches during the summer months in 2027. An estimated

⁴⁸ Terri Langford, “Gov. Greg Abbott Vetoes Funding for Federal Summer Lunch Program for Low-Income Children,” Texas Tribune, June 23, 2025, <https://www.texastribune.org/2025/06/23/texas-summer-lunch-ebt-greg-abbott-veto/>.

3.75 million children statewide would have qualified.”⁴⁹ On paper, this program would have helped with nutrition and financial access to food. It may have helped with physical access depending on where and how the food would be distributed to children. However, the budget item was vetoed and thus, none of its potential impacts could be made. The rubric accounts for the program as implemented—or rather as it was not.

PHYSICAL	1/3
FINANCIAL	1/3
NUTRITIONAL	1/3
TOTAL SCORE	3/9
This program addresses none of the physical, financial, or nutritional considerations. As it fails to help with any concern, it is not recommended.	

B. ZONING AND LAND-USE PROGRAMS

Case studies of this category detail ways in which local governments or community initiatives at the local level have created systems of urban farms, community gardens, grocery stores, or otherwise improved the physical access to food. These programs best showcase the unique role municipal governments can play in food access policy. Unlike the federal government, local governments often explicitly work with land-use ordinances and laws, making this more achievable. This makes them useful for addressing food deserts and the issue of physical accessibility. Through zoning ordinances, tax incentives, land-use

⁴⁹ Langford, “Gov. Greg Abbott Vetoes Funding.”

designations, and grocery financing programs, local governments can help determine where food is grown, sold, and distributed. However, these programs do not always address financial affordability or nutritional quality on their own. For that reason, these interventions are most effective when paired with other policies that address the price or purchasing power of goods. Some of the programs and policy interventions in this category are detailed below, as are their rubric scores and comments.

B.1. Urban Garden District in Cleveland, OH⁵⁰

Cleveland, Ohio updated its zoning law to create and thus encourage an “Urban Garden District.” This set forth standards for what constitutes a community garden. It also explicitly states the purpose of this land, “Only the following main uses shall be permitted in an Urban Garden District: (a) Community gardens which may have occasional sales of items grown at the site; (b) Market gardens, including the sale of crops produced on the site.” This helps with physical accessibility by creating these spaces within communities where there was not previously as easy to access food and places to grow food. This land cannot be commercially developed, yet allows farmers to sell produce. This does not directly aid in the affordability of food, though it can be argued to help with nutrition as it specifically looks at produce.

PHYSICAL	2/3
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⁵⁰ City of Cleveland, “Chapter 336: Urban Garden District,” Cleveland, Ohio Code of Ordinances, accessed March 2026, https://codelibrary.amlegal.com/codes/cleveland/latest/cleveland_oh/0-0-0-13202.

FINANCIAL	1/3
NUTRITIONAL	2/3
TOTAL SCORE	5/9
This program addresses some of the physical, none of the financial, and some of the nutritional considerations. As it helps with two concerns but does so indirectly and with limitations, it is partially recommended.	

B.2. California Urban Agriculture Incentive Zones Act⁵¹

Instead of just defining and helping set up urban land zoning, this program provides tax benefits for those who set aside part or all of their land for agricultural purposes. This helps farmers earn some revenue, and may incentivize community gardens and farmers markets to emerge. People are not required to turn their entire property into a farm, making this an appealing choice for many. This program does not guarantee any specific crop type or necessarily help people purchase produce, so it does not do much to address food mirages or swamps. However, as it grows, more farms will emerge and thus, more local produce.

PHYSICAL	2/3
FINANCIAL	1/3
NUTRITIONAL	2/3
TOTAL SCORE	5/9

⁵¹ University of California Agriculture and Natural Resources, “Urban Agriculture Incentive Zones Act (AB 551),” accessed March 2026, <https://ucanr.edu/site/urban-agriculture/urban-agriculture-incentive-zones-act-ab551>.

This program addresses some of the physical, none of the financial, and some of the nutritional considerations. As it helps with two concerns but does so indirectly and with limitations, it is partially recommended.

B.3. Pennsylvania Fresh Food Financing Initiative⁵²

Focused not on urban farms, this program provides financial incentives for grocery stores to open in areas previously underserved by them across Pennsylvania. This immediately addresses issues of food deserts, perhaps in the clearest way yet. Grocery stores are incentivized to be opened in areas of need, putting more physical access to food near people who need it. There is no specific guarantee of the health of these stores or of the prices, but the program is worded in such a way as to talk about food insecurity—supporting this research’s assumption that they will prioritize grant applicants who are not expensive retailers.

PHYSICAL	3/3
FINANCIAL	2/3
NUTRITIONAL	2/3
TOTAL SCORE	7/9
This program addresses many of the physical, and some of the financial and nutritional considerations. As it meaningfully helps with one concern and partially helps with two others, it is recommended in specific contexts or in tandem with other programs.	

⁵² The Food Trust, “Pennsylvania Fresh Food Financing Initiative,” accessed March 2026, <https://thefoodtrust.org/what-we-do/hffi/pa/>.

B.4. Stop ‘n Save in Hill District, Pittsburgh, PA⁵³

This program emerged due to efforts to address a food desert in the “Hill District” of Pittsburgh. This program was funded by the Healthy Food Financing Initiative as a way to test the placing of grocery stores into food deserts and their outcomes. On paper, it would assist with nutrition and physical access to food. However, in its implementation, there were numerous issues and a study actually found that “residents actually ate fewer fruits, vegetables, and whole grains after the supermarket opened. That may be because neither the new store nor any other market in the area paid any special attention to marketing healthier food.”⁵⁴

PHYSICAL	3/3
FINANCIAL	1/3
NUTRITIONAL	1/3
TOTAL SCORE	5/9
This program addresses many of the physical and none of the financial or nutritional considerations. As it meaningfully helps with only one concern, it is not recommended as a standalone intervention.	

C. COMMUNITY-LED PROGRAMS

⁵³ Doug Irving, “The Surprising Ways That a Supermarket Changed a Food Desert,” RAND, February 24, 2016, <https://www.rand.org/pubs/articles/2016/the-surprising-ways-that-a-supermarket.html>.

⁵⁴ Irving, “The Surprising Ways.”

Case studies of this category cover a range of food banks, food pantries, community gardens, consulting programs, and cooperative programs that have limited direct government involvement. In some cases, public-private partnerships or grants from the government help support these initiatives. In other cases, they are led primarily by nonprofit organizations or community groups. As a benefit, they may be more flexible than federal or state programs and more capable of adapting to local conditions. They sometimes also provide services beyond food provisioning that help with long-term reductions in food insecurity. However, these programs often depend on donations, grants, volunteer labor, resident awareness, and continued community participation. Without consistent funding or effective advertisement and communication, some community programs can have limited or only short-term impact. Some of the programs and policy interventions in this category are detailed below, as are their rubric scores and comments.

C.1. Chrysalis Center Freshplace⁵⁵

Freshplace, located in Hartford, Connecticut, is one of the most established food pantry programs discussed in this research. In addition to providing fresh produce to families in the area, they also offer caseworkers and client services to help poor families with other aspects of poverty and long-term food strategy solutions. In some articles, this was considered the gold standard food provisioning program. It helps with accessibility, affordability, and nutrition. The accessibility piece assumes people are able to access it and are aware of it. This model has successfully been adopted elsewhere and has influenced

⁵⁵ Chrysalis Center, “Freshplace,” accessed March 2026, <https://chrysaliscenterct.org/food/>.

other food pantry networks nationwide. The only issue with this is the need for fundraising efforts and grant-writing as it does not inherently get funding from the government.

PHYSICAL	2/3
FINANCIAL	3/3
NUTRITIONAL	3/3
TOTAL SCORE	8/9
This program addresses some of the physical, and many of the financial and nutritional considerations. As it meaningfully helps with two concerns and partially helps with a third, it is recommended.	

C.2. Feeding America Food Choice System⁵⁶

Feeding America used to operate a “typical” food distribution network in which food was gathered, centrally-managed, and distributed from the corporate organization to food pantries in the network. Now, the pantries and banks are allowed to “bid” for different food items and quantities that best fit their communities. This bottom-up approach has seen improvements to access compared to the previous system. While there does not seem to be a lot of data on nutrition, this clearly is an improvement to accessibility and affordability. This is almost private-sector involvement with little government connection, but its work supports communities very clearly at the local level.

⁵⁶ Robert M. Fano, The Choice System (Washington, DC: International Food Distribution Association, 2024), <https://www.ifdaonline.org/wp-content/uploads/2024/02/fano-the-choice-system.pdf>.

PHYSICAL	2/3
FINANCIAL	2/3
NUTRITIONAL	1/3
TOTAL SCORE	5/9
This program addresses some of the physical and financial, and none of the nutritional considerations. As it indirectly helps with two concerns but does not clearly improve nutritional quality, it is partially recommended.	

C.3. More Than Food Consulting⁵⁷

Inspired in part by the success of Freshplace, this organization collaborates with and consults food banks and pantries on best practices and addressing social determinants as well as the best ways to provision and distribute food. This does not directly impact people but it creates a better network to improve nutrition, accessibility, and affordability. It could be a reliable partner for cities or municipalities looking for guidance on taking proven policy solutions and applying it to their own contexts.

PHYSICAL	2/3
FINANCIAL	2/3
NUTRITIONAL	2/3
TOTAL SCORE	6/9
This program addresses some of the physical, financial, and nutritional considerations. As it indirectly helps with all three concerns, it is partially recommended.	

⁵⁷ More Than Food Consulting, "It Takes More Than Food," accessed March 2026, <https://www.ittakesmorethanfood.org/>.

C.4. Phoenix Community Gardening Initiative⁵⁸

Led by the Phoenix Revitalization Corporation, the Phoenix community gardening initiative sought to bring community gardening as a practice to a lower-income and food-insecure area of Phoenix, Arizona. There were many purported benefits of this garden, including ones of more income and better nutrition. However, the garden was far less impactful than initially imagined and a study of the program found that residents were unaware of its existence. As explained, “results revealed that while respondents had a level of gardening interest and experience in the community, they also lacked awareness about the gardening program.”⁵⁹ The lack of awareness dilutes the results and brings up an important consideration for successful policies.

PHYSICAL	2/3
FINANCIAL	1/3
NUTRITIONAL	1/3
TOTAL SCORE	4/9
This program addresses some of the physical, and none of the financial or nutritional considerations. As it only partially helps with one concern and does not meaningfully help with multiple issue areas, it is not recommended.	

⁵⁸ Tommy Bleasdale, Carolyn Crouch, and Sharon L. Harlan, “Community Gardening in Disadvantaged Neighborhoods in Phoenix, Arizona: Aligning Programs with Perceptions,” *Journal of Agriculture, Food Systems, and Community Development* 1, no. 3 (2011): 99–114, <https://doi.org/10.5304/jafscd.2011.013.007>.

⁵⁹ Bleasdale, Crouch, and Harlan, “Community Gardening in Disadvantaged Neighborhoods,” 99–114.

D. GOVERNMENT-ADMINISTERED GROCERS

Case studies of this category cover a range of programs such as military commissaries, state or city-run grocery stores, and other instances in which the government subsidizes or directly distributes food at a reduced rate. Of note, this is not free provisioning of items but the government engaging in the private market. At their best, government-administered grocers can directly address physical access by placing food distribution or stores in communities that otherwise lack them. They may reduce costs using government economies of scale or subsidization. However, they are dependent on political pressure and on private-market concerns such as labor and costs. Government involvement can help with accessibility and affordability, but it does not guarantee long-term success or viability. Some of the programs and policy interventions in this category are detailed below, as are their rubric scores and comments.

D.1. Defense Commissary Agency⁶⁰

The Defense Commissary Agency (DeCA) manages the network of military commissaries that provide packaged foods and produce to military personnel and their families at a reduced rate. They often operate on a cost-plus model in which people pay the cost of military procurement plus a preset fee that covers operating costs and long-term management. It is not a free food program but offers a discount of at least ~25% on many food items. They are working to expand nutritious offerings, but already this is an

⁶⁰ Defense Commissary Agency, “We’re Stronger Together,” accessed March 2026, <https://corp.commissaries.com/stronger-together>.

improvement to affordability. The accessibility here is questioned as this is not open for all people, just those in the military or under certain classifications.

PHYSICAL	2/3
FINANCIAL	3/3
NUTRITIONAL	2/3
TOTAL SCORE	7/9
This program addresses some of the physical, many of the financial, and some of the nutritional considerations. As it meaningfully helps with one concern and partially helps with two others, it is recommended in specific contexts.	

D.2. St. Paul Supermarket in St. Paul, KS⁶¹

Prior to this intervention, St. Paul, Kansas had a total lack of grocery stores and residents needed to drive over 20 miles to get groceries, or go to a local coffee shop to get produce and fresh food. A newly elected mayor in 2005 decided to open city-run and community-supported grocery stores that provided for residents' needs. This improved physical access and nutritional access, but there were no clear data on whether it helped with costs or expenses compared to other grocery stores. Still, it was a promising start and may still be actively aiding its residents.

⁶¹ Rural Grocery Initiative at Kansas State University, St. Paul Supermarket: Success Story, May 2020, https://www.ruralgrocery.org/learn/publications/case-studies/St_Paul_Success_Story.pdf.

PHYSICAL	3/3
FINANCIAL	1/3
NUTRITIONAL	2/3
TOTAL SCORE	6/9
This program addresses many of the physical, none of the financial, and some of the nutritional considerations. As it meaningfully helps with one concern and partially helps with another, it is partially recommended.	

D.3. Baldwin Market in Baldwin, FL⁶²

A small, conservative town in Florida also opened a community grocery store managed in part by the local government. Using a mix of donations, public-private partnerships, and local government management of infrastructure and procurement, they are able to lower the costs and pass those savings on to residents. The same benefits exist as other community grocery stores: better access, affordability, and nutrition for citizens of the area. However, these sorts of grocery stores and programs are susceptible to political or economic pressure. Changes such as a new mayor, new financial priorities, or population change may spell the end for these programs. In fact, the grocery store was forced to close

⁶² Antonia Noori Farzan, "When a Deep-Red Town's Only Grocery Closed, City Hall Opened Its Own Store," Washington Post, November 22, 2019, <https://www.washingtonpost.com/nation/2019/11/22/baldwin-florida-food-desert-city-owned-grocery-store/>.

in 2024 due to issues with operating costs.⁶³ To represent this, a rubric from both when it was operational and the policy after its failure are scored.

PHYSICAL	3/3
FINANCIAL	2/3
NUTRITIONAL	2/3
TOTAL SCORE	7/9
This program addressed many of the physical, and some of the financial and nutritional considerations. As it meaningfully helped with one concern and partially helped with two others, it was recommended while operational.	

PHYSICAL	1/3
FINANCIAL	1/3
NUTRITIONAL	1/3
TOTAL SCORE	3/9
After closure, this program addresses none of the physical, financial, or nutritional considerations. As it no longer meaningfully helps with any of the three concerns, it is not recommended as a standalone intervention.	

D.4. Sun Fresh Market in Kansas City, MO⁶⁴

⁶³ Khalil Maycock, “‘It Was a Staple for Us’: Baldwin’s Town-Owned Market Expected to Close in March,” News4JAX, February 24, 2024, <https://www.news4jax.com/news/local/2024/02/25/it-was-a-staple-for-us-baldwins-town-owned-market-expected-to-close-in-march/>.

⁶⁴ Sam Zeff, “A Troubled Kansas City Grocery Store Has Closed, Despite Nearly \$18 Million in City Investments,” KCUR, August 12, 2025, <https://www.kcur.org/news/2025-08-12/kansas-city-grocery-store-sun-fresh-closed-despite-18-million-city-investments-food-desert>.

Another government-funded store program was the Sun Fresh Market in Kansas City, MO. It was situated in a low-income area and funded in part by taxpayers to bring fresh produce to the area previously missing easy access to grocery stores. However, it quickly shut down due to cost issues, failure to stock shelves, and crime in the area. Similar to the Baldwin Market example, the Sun Fresh Market is scored both before and after its failure as a policy intervention.

PHYSICAL	2/3
FINANCIAL	1/3
NUTRITIONAL	2/3
TOTAL SCORE	5/9
This program addressed some of the physical, none of the financial, and some of the nutritional considerations. As it partially helped with two concerns but did not meaningfully address affordability, it is not recommended as a standalone intervention.	

PHYSICAL	1/3
FINANCIAL	1/3
NUTRITIONAL	1/3
TOTAL SCORE	3/9
After closure, this program addresses none of the physical, financial, or nutritional considerations. As it no longer meaningfully helps with any of the three concerns, it is not recommended.	

In general, the only issue with a lot of these exemplar programs is that they do not have consistent data or easily accessible long-term findings. Cases such as the Baldwin, Florida Market are covered more in popular media than academic or economic research. A lot of these programs work well when the administration in those areas supports them, but they fall apart otherwise. This is another reason why the cases themselves should not bear as much significance as the ideas and functions they represent.

VI. RECOMMENDATIONS AND SOLUTIONS

What is clear from the case studies and policy proposals is that both physical accessibility and financial affordability of food must be considered when determining best practices in local food policy. In a food desert—without physical access—financial support from the federal government does not do much to help. In a food mirage—without affordable food—local zoning for options like farmer’s markets still do not make a significant difference. Functionally, addressing one issue without considering the other still leads to a lack of nutritious food for individuals and households. According to the research and the previous literature, there is not one perfect or universally-applicable solution to achieving both physical accessibility and financial affordability of nutritious food. However, different policy moves improve at least one aspect of the dual problems of accessibility and affordability. Local governments and municipal decision-makers may have smaller discretionary budgets than federal agencies, but they have a more direct impact on people’s ability to become food secure. For example, zoning laws, procurement of food for school lunches, and price mechanisms such as local discount schemes and favorable incentives for grocery stores and community gardens are policies handled most extensively at the local level.

Much of the existing body of research suggests “more research is needed” and few sources have been able to provide it. However, the findings and the sheer variety in different approaches appear to confirm earlier assumptions that multiple solutions would need to be implemented in tandem to achieve the mission of improving access to nutritious food. What remains clear is that through localization and a combination of economic, urban

planning, and political maneuvers, better food provisioning can be realized, and the dual issues of lacking accessibility and affordability may be addressed.

Of importance to note is that some of the failed and discontinued cases demonstrate that a program needs to be more than just good on paper. Food access interventions must also be assessed on their political viability, community awareness about their existence, and whether they can last through changes in funding, leadership, and market conditions. Localization of food access is not itself the perfect solution, but the level of government in which policies can best be bundled and context-specific solutions may be most effectively designed to survive these circumstances.

SNAP-adjacent programs work best when there is a guaranteed line of funding from the state. These programs do well when they ease the barrier for entry, for example by not requiring a separate application and counting SNAP eligibility as automatic program eligibility. Done well, they can go the furthest to address issues of affordability by actually providing people more purchasing power, and can specifically help nutrition by connecting these dollars to produce or healthy food items. Adopted policies of these categories should ensure a low bar of entry and a connection with local farmers or food production. Problematic implementations are not advertised well, do not make a distinction on nutrition, and require bureaucratic messiness to enroll. These implementations still would not improve accessibility and would do little to improve nutrition or affordability.

Zoning regulations work best when they incentivize the creation of community gardens or urban farms strategically rather than arbitrarily. The placement of a farm on the outskirts of a large city does not actually help the access of people living at the opposite

end. These solutions are wide-ranging and could even include the attraction of grocery stores or prioritization of renting out real estate to food-selling establishments. The caution with these programs is that unless they are made in a strategic way or paired with other programs, they run the risk of creating food mirages in which food may exist but there is no meaningful improvement in its affordability.

Community-run programs offer the most variety in services and quality of food provisioning. Some of them are successful examples of supply-chain and logistics mastery that state and municipal officials ought to adopt. In other cases, unique consulting businesses and food management programs can help indirectly with food affordability, access, or nutrition, but rarely with all three at the same time. This category is the hardest to place and may also be the most difficult to adopt by itself. However, paired with solutions from other categories, these programs can provide valuable implementation partners.

Finally, government-run grocers help mildly with affordability, sometimes nutrition, and in some cases with physical access. While programs such as U.S. military commissaries have existed for decades and reliably produce some level of discount on food items, city-run grocery stores are a relatively new concept and do not have long-term data on their effectiveness or impact. In tandem with SNAP-adjacent programs, the cost savings can be multiplied. These programs are susceptible to changes in leadership or challenges from competitors in the market. As the Baldwin and Sun Fresh cases demonstrate, beginning these grocery stores is not the same as sustaining them over time.

In summarizing the many different interventions offered to address food access, the need for multiple simultaneous solutions is apparent. Ideally, a municipality should adopt a

SNAP-adjacent program that helps cover the cost of food for people while changing zoning laws and offering economic incentives for a community grocery store or garden to assist with physical access. None of the specific program case studies can likely be replicated exactly into a new context, but their structural components—the easy eligibility of the Florida Fresh Access Bucks or the zoning incentives of the California Urban Agriculture Incentive Zones Act—create a useful policy menu for policymakers to adopt.

VII. CONCLUSION

The question of “how” to localize food provisioning programs and food policy does not have a one-size-fits-all answer. Instead, the research demonstrates that different states, counties, and cities implement and administer different programs to varying degrees of success. While the research set out with the intention of identifying the strongest policy choices that work across the board, the difficulty in doing so emerged with a lack of follow-up studies and consistently-measured data on program success. Instead, this research's primary contribution to the field is the development of a unique rubric to assess food provisioning programs. Combining insights from food studies, economics, public policy, and environmental/urban studies, the rubric is a novel tool that policymakers and key decision-makers ought to use when assessing the feasibility, viability, and effectiveness of policy programs. While this is not an exhaustive list of every food provisioning program created, the case studies and literature review demonstrate how an application of this rubric can sort through seemingly different policies and programs using the same standardized lenses.

The inclusion of failed and discontinued case studies further clarifies the value of this rubric. A program may be promising at its launch but ineffective after political challenge, failed implementation, or limited community awareness. Thus, as demonstrated in this research, the rubric is not only a tool for assessing programs in their ideal circumstance, but also a way to evaluate whether interventions remain useful over time.

While existing literature captures some success stories and some promising policy proposals, the reality is that different contexts have constituents with different

socioeconomic conditions, and thus, have differing needs. Not all policies will work in all contexts or successfully and simultaneously address nutrition, affordability, and accessibility of food. Most likely, policymakers will need to implement multiple policy approaches if they are seeking to adequately address food access in their communities. Through the use of this rubric and its assessment of all three prongs of food access, they can best determine the policies that will have the greatest impact. To provide “good food” in the neighborhood, there is a significant benefit to localizing food policy. However, these programs and interventions must address physical accessibility, financial affordability, nutritional quality, and remain politically and fiscally viable over time.

APPENDICES

APPENDIX 1: Timeline of Food Regulation and Provisioning Programs

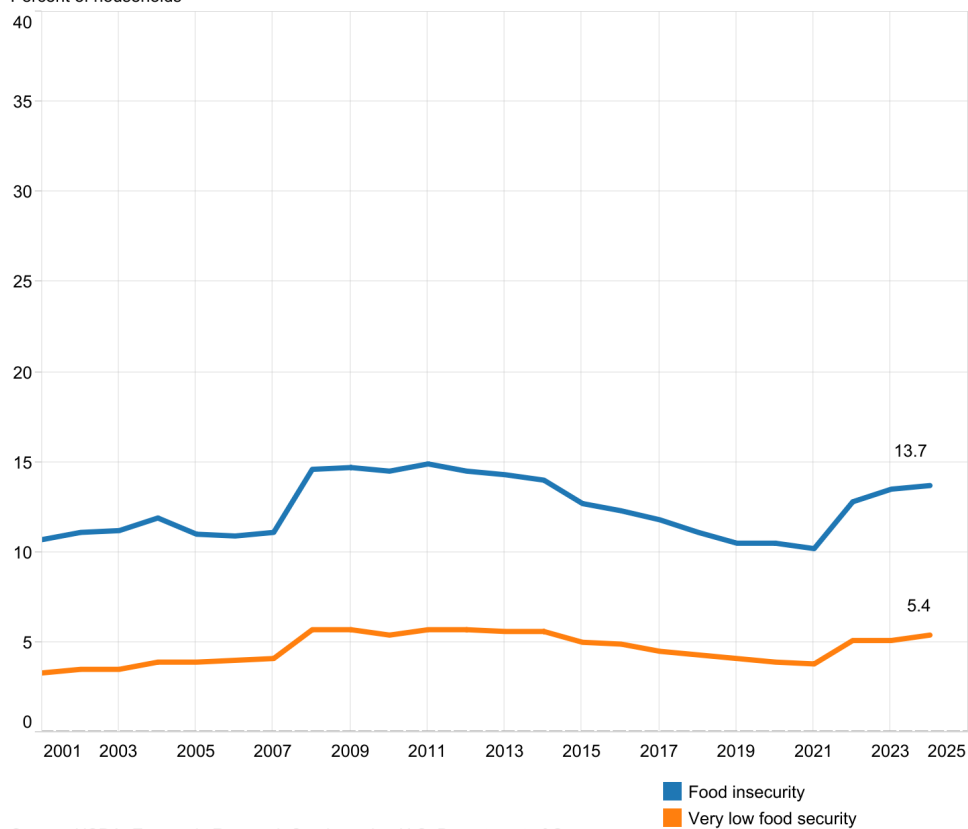
1906	Pure Food and Drug Act
1939	First Food Stamp Program
1964	Food Stamp Act
1977	Food and Agriculture Act
1990	Nutrition Labeling and Education Act
1991 - ongoing	Defense Commissary Agency
2004 - 2010	Fresh Food Financing Initiative (Pennsylvania)
2007 - ongoing	Urban Garden District (Cleveland, OH)
2008	Food, Conservation, and Energy Act
2013 - ongoing	Fresh Access Bucks (Florida)
2013 - 2019	Stop 'n Save (Pennsylvania)
2014 - ongoing	Urban Agriculture Incentive Zones (California)
2017 - ongoing	Healthy Incentives Program (Massachusetts)
2018 - 2025	Sun Fresh Market (Missouri)
2019 - 2024	Baldwin Market (Florida)
2019 - ongoing	Gus Schumacher Nutrition Incentive Program
2020 - ongoing	Good Food Bucks (New Jersey)
2025 - 2025	Summer Electronic Benefits Transfer Veto (Texas)

APPENDIX 2: Overall Trend in Food Security**Trends in U.S. food security**

Food insecurity, all households	Food insecurity by race and ethnicity	Very low food security by race and ethnicity	Food insecurity by household composition	Very low food security by household composition
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Trends in the prevalence of food insecurity and very low food security in U.S. households, 2001–24

Percent of households

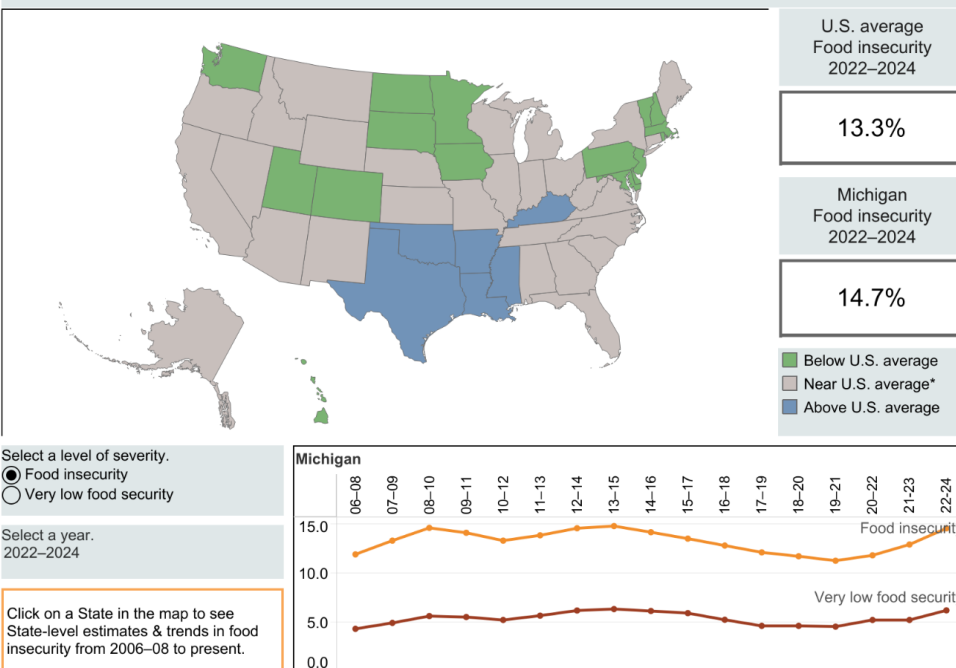


Source: USDA, Economic Research Service using U.S. Department of Commerce, Bureau of the Census, Current Population Survey Food Security Supplements data.

APPENDIX 3: Food Insecurity by State

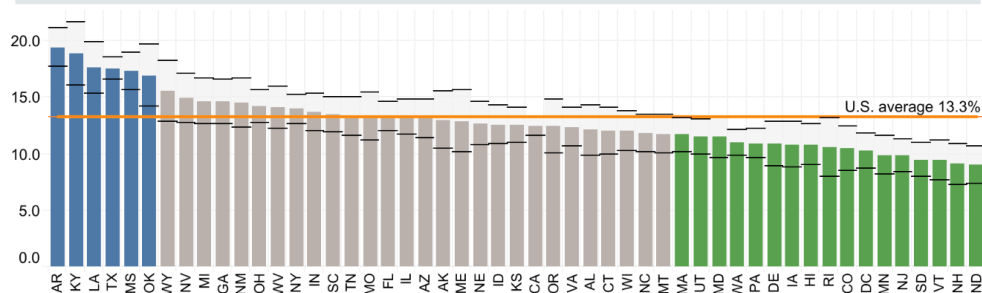
How do States compare to the U.S. average?

Food insecurity ■ 2022–2024



How do States compare to each other?

Food insecurity ■ 2022–2024



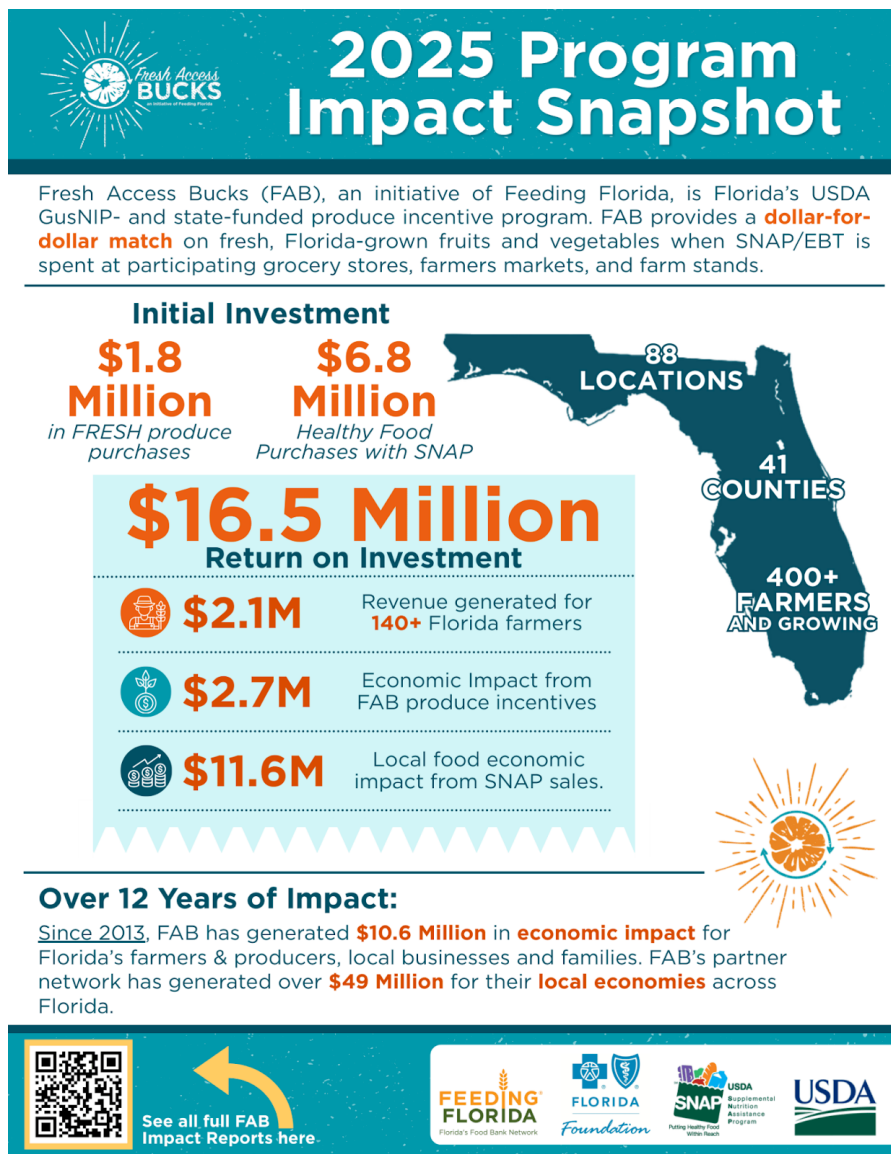
State Prevalence rates are given with a 90-percent confidence interval (black lines) with the U.S. national average (orange line) for reference. The 90-percent confidence intervals represent a range of values which are likely to include the actual food insecurity rate for each State and are calculated with the margins of error for the State prevalence rates. The margin of error reflects sampling variation—the uncertainty associated with estimates that are based on information from a limited number of households in each State. For this reason, margins of error should be taken into consideration when interpreting these statistics and especially when comparing rates across States. Prevalence rates for 3 years are averaged to provide more reliable statistics at the State level.

*States that are categorized as Near U.S. average have prevalence rates that are not statistically significantly different from the U.S. average.

- **Food secure** households had access, at all times, to enough food for an active, healthy life for all household members.
- **Food-insecure** households are uncertain of having, or unable to acquire, at some time during the year, enough food to meet the needs of all their members because they had insufficient money or other resources for food. Food-insecure households include those with *low food security* and *very low food security*.
- Households with **very low food security** are food insecure to the extent that normal eating patterns of some household members are disrupted at times during the year, with self-reported food intake below levels considered adequate.

Source: USDA, Economic Research Service using U.S. Department of Commerce, Bureau of the Census, Current Population Survey Food Security Supplements data.

APPENDIX 4: Florida Fresh Bucks Impact



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