

[NCUIH Submits Comments to the Administration, the Department of Health and Human Services, and the US Department of Agriculture on the National Strategy for Hunger, Nutrition, and Health](#)

Category: Policy Blog

written by Anna Schwartz | August 9, 2022

On July 15, 2022, the National Council of Urban Indian Health (NCUIH) submitted [comments](#) and recommendations to the Administration, the Department of Health and Human Services (HHS), and the US Department of Agriculture (USDA) on hunger, nutrition, and health. This comment was in response to [correspondence](#) from the Administration, HHS, and USDA dated May 27, 2022, which sought input on the development and implementation of the national strategy on hunger, nutrition, and health. NCUIH recommended that the Administration, HHS, and USDA support UIO programs to promote food security, nutrition, and exercise, include urban AI/AN populations in future research efforts and government projects, and establish consistent Urban Confers regarding nutrition, hunger, and health.

Background

AI/AN people face high levels of [food insecurity](#) and diseases related to lack of access to healthy foods, including [diabetes](#) and [heart disease](#). Furthermore, AI/AN people who live in urban settings are especially likely to experience food insecurity. According to a [2017 report](#) published in the Journal of Hunger & Environmental Nutrition, “[u]rban AI/ANs were more likely to experience food insecurity than rural AI/ANs.” The [high rates of food insecurity in urban AI/AN communities](#) are likely a result of “AI/ANs living on reservations... [having] access to tribally provided food and health care resource services that may not be accessible to AI/ANs living in urban areas.”[\[1\]](#)

NCUIH’s Actions

As a result of the high rates of food insecurity in urban AI/AN communities, and in effort to highlight the programs already in place at UIOs that address hunger, nutrition, and physical exercise, NCUIH made the following recommendations to the Administration, HHS and USDA:

- NCUIH recommended that the Administration, HHS, and USDA support UIO programs to promote food security, nutrition, and exercise.
 - Many UIOs operate programs to improve food security and nutrition, such as: food banks, meal services, community gardens, cultural cooking and nutrition classes, community workout groups, facilities, and events, and counseling and classes about diabetes prevention and care. Through their offerings, UIOs incorporate cultural knowledge and traditional practices, address other social needs, and strengthen community bonds.
 - Recognizing that UIOs face chronic underfunding which limits them from expanding their offerings, NCUIH urged the Administration, HHS, and USDA to support the maintenance and expansion of UIO programs related to hunger and nutrition.
- NCUIH requested that the Administration, HHS, and USDA support further research efforts

- and include urban AI/AN populations in future framing documents and government projects.
- The inclusion of data about urban AI/AN populations in future research projects about food security and nutrition will contribute to a more comprehensive and reflective understanding of AI/AN experiences and needs.
 - Any and all efforts to include UIOs and urban populations in government research projects should be complementary to the inclusion of Tribal governments and should not supplant or otherwise alter Tribal representation. Research efforts should also respect tribal sovereignty.
- NCUIH requested that HHS and USDA establish consistent Urban Confers with UIOs regarding nutrition, hunger, and health.
 - Urban Confers are not only integral to addressing the care needs of urban AI/AN persons and fulfilling the government's trust responsibility, but also sound public policy.
 - Meeting regularly with UIO through Urban Confers will help HHS and the USDA ensure that AI/ANs in urban areas are able to voice their needs and priorities to both agencies.
 - Urban Confer policies or inclusion of UIOs in UIO-specific consultations do not supplant or otherwise alter Tribal Consultation and the government-to-government relationship between Tribes and federal agencies.

NCUIH will continue to closely follow the Administration's development and implementation of the national strategy on hunger, nutrition, and health. NCUIH will also continue to advocate for the resources needed to reduce health disparities for AI/ANs, regardless of where they live.

[1] *Id.* at 5-6. See also Castor M.L., Smyser M.S., Taulii M.M., et al., *A nationwide population-based study identifying health disparities between American Indians/Alaska Natives and the general populations living in select urban counties*. 96 Am. J. Public Health. 1478-84 (2006).