

1 **Title: Foods Distributed During Federal Disaster Relief Response In Puerto Rico Did Not Fully**
2 **Meet Federal Nutrition Recommendations**

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5 **Running Title: Federal Emergency Foods after Hurricane María**

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11 **RESEARCH SNAPSHOT (n=100)**

12 *Research Question:* Did federal emergency foods intended for household distribution after Hurricane
13 María meet the Dietary Guidelines for Americans?

14 *Key Findings:* This rapid assessment conducted in a rural municipality of Puerto Rico in the aftermath of
15 Hurricane María (November 2017) found that 41% of emergency foods were snacks and sweets, while
16 fruits, vegetables, proteins, and grains comprised 13%, 4% 13%, and 7%, respectively. Almost half of all
17 foods (46%) were high in sodium, saturated fats or added sugars, which made it challenging for registered
18 dietitians to design meal plans that did not exceeded the upper limit recommendations for those nutrients.

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21 **ABSTRACT**

22 *Background:* Emergency foods distributed during federal disaster relief response must follow the federal
23 Dietary Guidelines for Americans (DGA) according to the 1990 National Nutrition Monitoring Related
24 Research Act. Nutrition information of emergency foods for household distribution is scarce.

25 *Methods:* Using structured observation protocols, foods received daily at a federal distribution center in
26 Puerto Rico after Hurricane María (November 10-25, 2017) were grouped into DGA ChooseMyPlate
27 food groups. Data about their sodium, saturated fat, added sugars and fiber content per serving were
28 captured. Registered dietitians (RDs) designed meal plans with the foods distributed.

29 *Results:* Of 107 unique food items, 41% were snacks and sweets; fruits, vegetables, proteins, and grains
30 comprised 13%, 4% 13%, and 7%, respectively. Fifty-eight percent of all foods were low in fiber (≤ 1 g);
31 46% had high content of sodium, saturated fats or added sugars ($\geq 20\%$ Daily Value). The RDs were able
32 to design meal plans that complied with the DGA food group recommendations, but they exceeded upper
33 daily limits for sodium, saturated fat or added sugars.

34 *Conclusions:* In view of projected increases in natural disasters and diet-related chronic diseases, DGA
35 compliance must be improved so that federal emergency foods can support the health of survivors.

36 **Key words:** Hurricane María, Dietary Guidelines for Americans, Puerto Rico, emergency response,
37 humanitarian assistance

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40 INTRODUCTION

41 In September of 2017, the Caribbean was devastated by two powerful hurricanes. In Puerto Rico
42 approximately 3,000 deaths were attributed to hurricane María.¹⁻³ The population was already highly
43 vulnerable to poverty, food insecurity, and exhibited high rates of obesity, diabetes, and hypertension.^{4,5}
44 Puerto Rico experienced a near destruction of local food production, the collapse of the power grid, and
45 decimated potable water systems, with repercussions that lasted for months.⁶⁻¹⁰ The disruption in the
46 power grid limited access to Family's Electronic Benefit Transfer (EBT) or to cash via automated teller
47 machines (ATM), which further limited ability to purchase foods.^{8,11} The storm also disrupted the supply
48 chain of imported foods, on which the Caribbean depends heavily.^{8,10}

49 Three days before Hurricane María's landfall in Puerto Rico, the White House issued a
50 Presidential Disaster Declaration that activated the U.S. National Response Framework.¹² This framework
51 is designed to ensure a single, comprehensive approach to disaster response. It designates the Federal
52 Emergency Management Agency (FEMA) as the lead federal agency in relief and recovery and the US
53 Department of Agriculture (USDA) as responsible for coordinating with state and territorial officials,
54 Federal and non-Governmental and private volunteer organizations to "determine the nutrition needs of
55 the population in the affected areas".¹³ The USDA may facilitate congregate feeding, activate the Disaster
56 Supplemental Nutrition Assistance Program (D-SNAP) and/or distribute boxes of foods to households.¹⁴

57 Any foods provided by federal programs must comply with the Dietary Guidelines for Americans
58 (DGA), according to the 1990 National Nutrition Monitoring Related Research Act (NNMRRRA).¹⁵ The
59 DGA are meant to help US citizens make healthier food choices.¹⁶ During disasters, personnel from the
60 USDA's Food and Nutrition Service (FNS) and Center for Nutrition Policy and Promotion (CNPP) are
61 responsible for aligning food choices with the DGAs.¹⁷ The use of donated foods is also subject to USDA
62 FNS approval.¹⁸

63 Relief efforts were criticized for distributing foods of poor nutritional quality in Puerto Rico in
64 the aftermath of Hurricane María.¹⁹⁻²³ However, data about how emergency foods intended for household
65 distribution meet the DGAs is extremely limited (in this and other disasters) because of the fast-paced

66 nature of the response and because foods come from varied contracts and donation sources.¹⁸ Filling this
67 data gap can improve the effectiveness of humanitarian actions in responding to the nutritional needs of
68 communities coping with disasters.

69 This study undertook a rapid assessment of the nutritional qualities of emergency foods distributed
70 to households after Hurricane María in Puerto Rico to evaluate how these foods met the DGAs
71 recommendations about food groups, fiber sodium, saturated fats and added sugars.

72 **METHODS**

73 A case-study approach was used to conduct this rapid assessment. This approach is most
74 appropriate for: (a) studies that ask ‘how’ questions (i.e. *how did the foods meet the DGA*
75 *recommendations?*); (b) where the investigator has little control over events; and (c) where the focus of
76 the study is on a contemporary phenomenon within a real-life context.²⁴

77 **Study Setting:** FEMA set up a distribution chain, described elsewhere,^{8, 9, 25, 26} that was fully
78 operational nearly one month after Hurricane María made landfall and continued until May 2018.⁸ The
79 research team conducted structured observations in two sites: (a) the federal distribution center in the San
80 Juan metropolitan area (herein referred to as the urban site), which received foods and beverages from
81 outside of Puerto Rico and distributed these to 11-14 rural municipalities, and (b) the distribution center
82 of a rural municipality (herein referred to as the rural site) which received these items from the urban site.
83 The rural site was Barranquitas, a low-income municipality located in the mountainous area of Puerto
84 Rico’s main island.²⁷ The rural site sustained significant infrastructure damage during the hurricane and
85 was purposefully selected to represent the experience that low-income, rural municipalities may have
86 faced in the aftermath of Hurricane Maria.^{28, 29}

87 **Observation Protocol:** Co-authors (AR and UCR) designed an observation protocol to document
88 the types of foods that were available for household distribution in the study sites. The protocol was
89 available in paper and electronically via a mobile application.³⁰ However, it was not possible to
90 exclusively use the mobile data-capture application due to persistent power outages. The protocol was
91 designed to capture date and time of observation, quantity of boxes, pallets, and individual items per box;

92 the number of boxes/pallets distributed to families, and the types of foods included in the boxes (e.g.
93 quantities and types of dairy, canned vegetables, canned protein, canned fruits, starches, beverages, and
94 desserts) following established guidance³¹. Pictures were also taken of pallets, boxes, and content of
95 boxes. The protocol included a space for RA to add open-ended notes. The study protocol was reviewed
96 by the institutional review board of George Washington University, which determined that it did not meet
97 the definition of human subjects' research.

98 The data collection team (UCR and six research assistants (RA)) were from Puerto Rico and
99 familiar with the rural site. RAs underwent an 8-hour training on how to conduct the structured
100 observations.

101 ***Data collection and analysis in urban site:*** Observations in the urban site occurred between November
102 10-24, 2017. The research team met twice daily to discuss and resolve challenges to data collection as
103 they arose, in line with recommendations for case-study methodology.³² An initial challenge faced was
104 that the team was not allowed to open pallets or boxes in the urban site, and therefore, the team took notes
105 and photographs of the alpha-numeric codes instead. These codes identified each box, the name of the
106 contractor company, and the intended date of delivery to the rural site--information that was then used to
107 verify deliveries in the rural distribution center.

108 Observations of number of pallets and boxes were enumerated across the study period. Any
109 observation notes provided by the RA were entered into the enumerated observations by date.

110 ***Data collection in rural site:*** Observations took place over a 11-day period (November 15- 25), when
111 RAs used the structured observation protocols to note the foods that were arriving at the location, and
112 note the content of opened boxes. RAs systematically photographed: (a) the exterior of the boxes; (b) the
113 contents inside each box (boxes were either a mix of different food items or filled with one food item); (c)
114 the package label with brand and size for individual items; (d) the Nutrition Facts Label; and (e) the list of
115 ingredients. The RAs also noted and photographed the alpha-numeric code that identified the pallets.

116 ***Data analysis in rural site:*** The photos were coded by study site and by topic into one of two: (a) photos
117 of the outside of boxes or pallets displaying alpha-numeric codes or (b) photos of the contents of the box.

118 The alpha-numeric codes pictured were then verified against those observed in the urban site. Photos of
119 box contents were used to capture the following data of each food item pictured: brand, serving and
120 package sizes, kilocalories (kcal), fiber (grams), sodium (micrograms), saturated fats (grams), and added
121 sugars (g) per serving, if available. These nutrients were selected given the DGA recommendations to
122 increase intake of whole grain/high fiber foods and to limit consumption of sodium, saturated fats, and
123 added sugars to help prevent diet-related chronic diseases.³³

124 The first four ingredients listed under the Nutrition Facts Label of each food item were used to
125 identify the food from the list of categories in the Food and Nutrient Database for Dietary Studies codes
126 linked to “What We Eat in America” (WWEIA), a national food survey of foods typically consumed in
127 the US.³¹ This information was used to then code each food item into food categories: milk and dairy,
128 animal and plant-based protein, mixed dishes, grains, snacks and sweets, fruit, and vegetables.

129 The serving size was assessed in one of two ways: a) according to manufacturer’s suggested
130 serving size or b) according to the entire package size if products were packaged in discreet units and
131 meant for individual consumption in one sitting (i.e. grab-and-go bags of chips, candy, main entrees).³⁴ If
132 the nutrient facts panel was not printed on the food packaging, or illegible in the photograph of the food
133 item, nutrient data were collected from the product manufacturer or from nutrient databases.³⁵⁻³⁷ If there
134 were discrepancies between these sources of data, the most conservative estimates were used (i.e. higher
135 fiber or lower sodium, saturated fat, added sugars).

136 Food items, brands, serving size, and nutrients per serving size were enumerated by food
137 categories from WWEIA.³¹ Duplicate items (items with same brands and flavor) were eliminated, so that
138 only unique food items were enumerated. Items that contributed 20% or more of the percent daily value
139 (%DV) for sodium, saturated fats, and added sugars per serving (for those items that had the added sugars
140 information available), were deemed to be high on those nutrients. The %DV is calculated based on the
141 Dietary Reference Intakes from an intake of 2,000 calories per day. Fiber content per serving (≤ 1 g fiber
142 per serving) was also noted.

143 *Development of meal plans with emergency foods:* To assess if intended beneficiaries would be able to
144 meet the DGA recommendations on a given day with the list of foods and beverages observed, a
145 registered dietitian (RD) from Puerto Rico was instructed to develop daily meal plans (breakfasts, lunch,
146 dinner and snacks). The dietitian was directed to: a) select foods to meet the DGA ChooseMyPlate food
147 group servings (6 oz grains, 2.5 cups vegetables, 2 cups fruits, 3 cups dairy, and 5.5 oz protein); b)
148 prioritize the selection of foods that were whole grain or had the lowest content of sodium, saturated fat
149 and/or added sugars per serving within each food group; c) include a variety of foods that would be
150 typically consumed by the population. The RD was allowed to repeat foods in order to meet the 2000
151 kcal/day, and instructed to exclude foods that had sugar/corn syrup, chocolate, salt or a fat as the first
152 ingredient (8% of items). All other snacks and sweets were included in the meal plan. This resulted in
153 three different daily ‘meal plans’ that combined the foods in order to meet the DGA food groups. To
154 check the justification and reliability of these meal plans, a second, senior RD (KR) independently
155 reviewed using data from the USDA’s SuperTracker online database³⁵ to ensure that servings were
156 assigned to the closest 0.25 cup according to single serving size per ChooseMyPlate food groups. If a
157 food item was not listed in this database, then the first listed ingredient was used to identify a food group
158 assignment and serving. If the first ingredient was water, the second was used. Food selections were
159 reviewed to ensure that the lowest sodium/saturated fat/added sugar items were chosen for the meal plans.

160 **RESULTS**

161 Commodities arrived in trucks directly from the ports to the urban sites on three days of the week
162 and were delivered to (or picked up by) rural municipalities during the rest of the week. Foods thus
163 arrived at the rural site on six of the 10 observation days, for a total of 35 pallets. Alpha-numeric codes
164 were captured for boxes and pallets on four of those days (24 food pallets had total content; 12 pallets had
165 missing content information). Once the food pallets arrived in the rural municipality, the research team
166 confirmed their arrival, opened the boxes and photographed their content. Half of the pallets observed
167 (n=12) contained shelf-stable meal modules that included two canned entrées (canned mixed dishes); one
168 breakfast snack (snacks and sweets); one cereal (grain); one bread/crackers (snacks and sweets); one salty

169 snack (protein); one fruit/nut mix (protein); three fruit cups (fruit); three sweet snacks (snacks and
170 sweets); one breakfast bar (snack and sweet); and one 8 oz. ultra high-temperature pasteurized (UHT)
171 milk (dairy) (**Figures 1-2**).

172 The team also obtained pictures of other foods that were present in the rural site, but were not
173 observed or documented in the urban one. These were all unlabeled boxes that contained only one type of
174 food (i.e. boxed UHT milk, boxes of cereal, canned beans, canned vegetables, fruits) and came directly
175 from the Department of Family Affairs in Puerto Rico during a one-time delivery at the time of the study.
176 The research team was able to confirm this by contacting the Department of Family Affairs in the study
177 municipality, and confirmed on USDA's website.¹⁵ Given that these boxes provided a variety of
178 vegetables and plant-based proteins that were not observed in the other boxes, these items were included
179 in the nutrition analysis to be fully-representative of the food options intended for households.

180 *Nutrition characteristics of emergency foods*

181 A total of 189 photos of pallets, boxes, and their contents were taken during the period of
182 observation (the full set of pictures available upon request from the corresponding author). For this
183 analysis, 20 photos which showed pallets of bottled water and personal care products were excluded.

184 After deleting repeated items (same brands and flavors n=43), infant formulas and hydration
185 solutions (n=3) and unidentified brands or flavors (n=11), and condiments (n=2) there were a total of 107
186 unique food items. **Figure 3** presents the distribution of these foods according to food categories in
187 WWEIA³¹: 41% of these were categorized as snacks and sweets which included grain-based desserts (i.e.
188 cookies, pastries) and dairy desserts (i.e. puddings).³³ Eighteen percent were mixed dishes such as canned
189 pasta dishes or meat-based dinners. Canned fruits and vegetables comprised 13% and 4% of items,
190 respectively. Plant-based and animal proteins were 13%, and grains (cereals, bread and bread products)
191 were 7%. Four percent of foods were categorized as dairy, which included boxed milk (whole and low-
192 fat).

193 More than half (58%) of the items were low in fiber (≤ 1 g per serving); and 46% were high
194 sodium, saturated fats, or added sugars content (i.e. $\geq 20\%$ of the DV for those nutrients per serving),

195 while the remaining 54% contributed below the 20% DV for all three: sodium, saturated fats and added
196 sugars. Eight percent listed the first ingredient as sugar/corn syrup, chocolate, salt or fat.

197 Meal Plans created in alignment with USDA dietary recommendation

198 Daily meal plans were designed to meet the DGA food group recommendations (**Tables 1-3**) and
199 contributed adequate amount of fiber (25-38 g) but exceeded the upper limits of sodium, saturated fat or
200 added sugars. For example, Meal Plan 2 was virtually vegetarian (no animal protein), including
201 unsweetened applesauce, fruits packed in 100% fruit juice, reduced sodium dishes and rice without
202 seasoning. It came under the daily upper limits for added sugars and saturated fats, but exceeded upper
203 limits for sodium.

204 **DISCUSSION**

205 Emergency foods distributed during federal relief efforts must follow the DGA according to the
206 1990 National Nutrition Monitoring Related Research Act.¹⁸ However, this study found that almost half
207 of the foods distributed after Hurricane María by federal relief efforts were high in sodium, saturated fats
208 or added sugars. Our meal plan analyses suggest that even after excluding 8% of the foods which had
209 very low nutritional value and choosing among the items that were lowest in sodium, saturated fats or
210 added sugars, it would be challenging for survivors to meet DGA food groups without exceeding the
211 upper limits for these harmful nutrients. This is particularly troublesome considering that the population
212 for which these foods were intended exhibits high burdens of obesity and diet-related chronic diseases.^{4,5}
213 With the increasing incidence of diet-related non-communicable diseases and frequency of natural
214 disasters, there is an urgent need for emergency foods to better align with the DGA to support the health
215 of survivors.³⁸

216 The implications of this study are two-fold: first, the findings suggest that during emergencies, it
217 is possible to provide pre-packaged and shelf-stable foods that contribute below the 20% DV of sodium
218 saturated fats and added sugars. While almost half of the foods were high in these nutrients, 54% were
219 low in all three (i.e. unsweetened fruit sauces; fruits packed in 100% fruit juice; canned vegetables packed
220 in water without salt, or reduced sodium mixed dishes). Providing a more varied selection of these foods

221 can afford survivors the opportunity to create meal plans that comply with DGA food groups, contribute
222 adequate fiber, and also do not exceed daily upper limits of sodium, saturated fats and added sugars. For
223 future emergency recover efforts, a vendor certification program similar to the one required from vendors
224 of the National School Lunch Program,³⁹ could improve the nutritional quality of emergency foods while
225 at the same time complying with the challenges of rapid procurement and distribution from many
226 different agencies and donors.

227 Second, survivors can meet their nutritional and energy needs **without candies, chocolate bars and**
228 **other foods** of very low nutritional value (8% of the unique foods in this study). The provision of these
229 ‘empty calories’ raises **the question** of whether FNS should accept nutritionally-poor foods during disaster
230 relief and recovery efforts. Some may claim that receiving these foods may be better than no food at all,
231 because they provide calories and “a sense of normalcy” or “comfort”, even if at the cost of nutrition.⁴⁰
232 However, any foods intended for comfort must also follow the federal nutrition guidelines if they are part
233 of a federal program, and must contribute to support the health of survivors.^{15, 17} In addition, the
234 meanings of comfort and normalcy should be defined by the recipient population, not the provider
235 population. In Puerto Rico, many survivors felt disrespected when receiving boxes of only or mostly
236 candy and chips during the relief efforts.²⁰

237 The results must be interpreted within its limitations. First, this was a rapid assessment study not
238 designed to answer questions about actual food consumption. Second, the types of foods observed may
239 have varied before and after the period of observation, and should not be extrapolated beyond that period.
240 **Third, since added sugar content was not available for all foods, this study likely underestimated the**
241 **number of products (and quality of meals) high in added sugars.** Fourth, our results depict the distribution
242 of unique items and not total quantities of food items, which may include repeated items. Regardless of
243 the total quantities, all of the different types of foods should contribute to support the health of survivors.
244 Fifth, this study is not an evaluation of USDA’s multiple strategies to respond to emergencies; it focused
245 only on household food distribution.

246 **CONCLUSIONS**

247 Short-term disaster relief such as food distributions could be expected to last longer in view of the
 248 increasing magnitude and frequency of natural disasters due to climate change⁴¹ which are also projected
 249 to disproportionately affect already vulnerable populations. The findings emphasize the need to establish
 250 strategies that can improve the DGA compliance so that emergency foods intended for distribution to
 251 households can support the health of survivors.

252

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