

THE U.S. DEPARTMENT OF AGRICULTURE
FOOD AND NUTRITION SERVICE

Agency Information Collection Activities:
Supplemental Nutrition Assistance
Program: Demonstration Projects

Docket No. 2024-07377

COMMENTS OF
THE CENTER FOR SCIENCE IN THE PUBLIC INTEREST

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The Center for Science in the Public Interest (CSPI) submits these comments in response to the U.S. Department of Agriculture's (USDA) "Agency Information Collection Activities: Supplemental Nutrition Assistance Program: Demonstration Projects" request for comments.

CSPI is a non-profit consumer education and advocacy organization that has worked since 1971 to improve the public's health through better nutrition and food safety. CSPI helped to lead efforts to win passage of the Nutrition Labeling and Education Act, the Healthy, Hunger-Free Kids Act, the Food Safety Modernization Act, chain restaurant menu labeling, and the Food Allergen Labeling and Consumer Protection Act. CSPI also publishes Nutrition Action (NA) and is supported by the subscribers to NA, individual donors, and foundation grants. CSPI is an independent organization that does not accept any corporate donations. CSPI is a strong advocate for improving food and nutrition security through the Supplemental Nutrition Assistance Program (SNAP). Since 2021, CSPI has funded and partnered with multiple statewide advocacy organizations to submit SNAP Demonstration Project requests.

CSPI urges USDA to provide greater transparency to the general public on the process for preparing and submitting USDA Demonstration Project requests, particularly for novel ideas. CSPI also encourages USDA to establish a grant program for novel SNAP Demonstration Projects that test ideas for improving SNAP that have been identified by those most impacted by the program, especially for innovative ideas that would advance equitable SNAP access. USDA should consider allocating funds for this grant program through FNS discretionary grants.

Since 2018, CSPI has funded and facilitated more than 10 statewide community-listening sessions with SNAP participants and stakeholders, representing the research, public health, social service, and anti-hunger fields, to gather feedback on strategies for increasing access to and affordability of nutritious food through SNAP. In at least 4 states, stakeholders and SNAP participants expressed interest in conducting local or statewide pilots to test promising strategies for improving food and nutrition security through SNAP. The top pilot ideas included exploration of in-store marketing strategies to highlight healthy items and expanding SNAP nutrition incentives to include more types of nutritious foods (e.g., lean protein, low-fat dairy, etc.) and to be available at more diverse types of retailers.

Since 2021, CSPI has funded statewide advocacy organizations in Iowa and Virginia to develop and submit USDA SNAP Demonstration Project requests to test novel ideas for improving food and nutrition security for SNAP participants in their states. We are still working with agencies in these states and USDA to submit these requests and have encountered challenges along the way including identifying which agency within USDA handles demonstration project requests, determining what information needs to be included in the request, the required components for the project evaluation, and the process for submitting and receiving feedback from USDA about the request. There is also a lack of clarity around USDA's timeline for reviewing the request. These are all challenges that could be alleviated with greater government transparency.

Given where we are in the process, our comment will only address the question regarding *ways to enhance the quality, utility, and clarity of the information to be collected specifically for preparing and submitting requests* as we do not yet have experience with the other aspects of SNAP Demonstration Projects.

Increasing transparency and reducing burden

Regarding ways USDA can enhance the quality, utility, and clarity of the information to be collected specifically for preparing and submitting requests, CSPI asks that USDA provide clear, concise instructions for how to submit SNAP demonstration project requests, particularly for novel ideas that do not fit into one of the predetermined buckets (e.g., Standard Medical Deduction) on the USDA website or through a virtual resource hub dedicated to SNAP demonstration projects and waivers. For example, the website or virtual hub could provide an outline of steps, a finite timeline, and a standard for approving or denying requests (e.g., process completed within 6 months or a year). USDA should also make clear the difference, if any, between SNAP Demonstration Projects and SNAP Pilots. Further, USDA can and should do a better job of creating awareness among the general public of SNAP Demonstration Projects as important tools for spurring innovation.

While state agencies are the ones to officially submit requests, in practice, ideas and proposals often originate at the community stakeholder level. State agencies are already understaffed and overburdened with implementing existing SNAP programs and they do not have the time or bandwidth to develop demonstration project ideas and requests. At the same time, most community stakeholders and advocacy organizations are unfamiliar with the concept of SNAP Demonstration Projects and waivers. Without clear information about the steps required for submitting a request, information that must be included in the request, and a timeline for request review, community stakeholders, advocacy organizations, and state agencies may spend significant time trying to figure these pieces out and ultimately may go through many iterations of proposals before they can officially be submitted. The lack of information on the timeline for approval is also problematic as applicants must take into account state budget cycles in order to move demonstration projects forward.

Creating more transparency for the public around the process for developing and submitting requests will reduce the burden on state agencies and community stakeholders alike. If community stakeholders have access to the same or similar information as state agencies, they can better support state agencies with the work required to develop requests and they will spend less time searching for information, which often includes conversations with state agencies who must explain processes verbally for lack of virtual factsheets or website.

Improving government transparency and reducing burden on state agencies is a triple win for government, community stakeholders, and most importantly for SNAP participants.

Sincerely,
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