



July 15, 2022

President Joe Biden  
The White House  
1600 Pennsylvania Ave, NW  
Washington, DC 20500

Ambassador Susan Rice  
Assistant to the President for Domestic Policy  
1600 Pennsylvania Ave, NW  
Washington, DC 20500

Dear President Biden and Ambassador Rice,

On July 6, 2022, the [Center for Science in the Public Interest](#) (CSPI)<sup>1</sup> hosted a partner-led listening session with food assistance stakeholders from the Commonwealth of the Northern Mariana Islands (CNMI) to discuss priorities for the 2022 White House Conference on Hunger, Nutrition, and Health. The discussions during the first conference in 1969 spurred expansion and implementation of key anti-hunger programs, such as the Supplemental Nutrition Assistance Program (SNAP), the Special Supplemental Nutrition Program for Women, Infants and Children (WIC), and the National School Breakfast and Lunch Programs (school meals). That conference occurred before CNMI was acquired as a territory by the U.S. We hope that this year's Conference will consider the needs of CNMI residents who face food and nutrition insecurity and shape policies accordingly.

The Conference is an opportunity to address the unique challenges that CNMI faces in obtaining affordable, nutritious diets and a healthy retail environment. [Over half of the CNMI population lives below the Federal poverty level](#). CNMI also is prone to natural disaster emergencies as demonstrated by the recent [typhoons](#) that devastated the territory. Because of the islands' size and remote location, CNMI imports approximately [90 percent](#) of its supplies, including food, relying heavily on shelf-stable, unhealthy food options and disrupting cultural food patterns. Further, CNMI is one of three U.S. territories that utilize the Nutrition Assistance Program (NAP), a capped block grant with limited food assistance funding for residents. This stands in contrast to the food assistance program utilized by the 50 states, SNAP, which is an entitlement program that expands in response to economic downturns. While the American Rescue Plan authorized a long overdue new [memorandum of understanding](#) to raise CNMI NAP funding from \$12M to \$30M in Fiscal Year 2022, there is still much to be done to address nutrition and health challenges in CNMI.

Our listening session with six stakeholders, including government, public health, and social service professionals working in CNMI, generated several recommendations to improve nutrition and health, and a poll with ranked choice voting was used to determine stakeholders' top recommendations. The top recommendations are as follows:

- 1. Strengthen the retail food environment so that shoppers have better access to nutritious options.**  
The stakeholders' top recommendation for creating a healthier retail environment is to leverage NAP and WIC's relationship with retailers to improve product offerings. Retailers who accept NAP and WIC benefits are subject to minimum stocking standards, and there is an opportunity to use stores' relationship with these programs to strengthen stocking standards and implement strategies to promote locally grown produce and other nutritious products. This strategy has the potential to significantly impact the health of all CNMI residents, including the more than [25 percent](#) of households who rely on NAP. Stakeholders also suggested that the federal and territory government can play a role in incentivizing retailers to adopt healthy food environment practices, such as by providing tax breaks for retailers who highlight nutrient-dense items.
- 2. Disincentivize sugar-sweetened beverage purchases.** [About 75 percent of adults in CNMI consume at least one sugary beverage per day](#) compared to [63 percent of adults in the 50 US states](#). Added sugars are [linked](#) to cardiovascular disease, cancer, diabetes and associated complications. During the Trump

administration, the CNMI NAP administration requested permission to use its regulatory flexibilities to not allow sugary beverages to be purchased with NAP benefits. This request was denied by US Department of Agriculture (USDA), but stakeholders believe this was a missed opportunity to curb unhealthy behaviors. Additionally, CNMI stakeholders have been working for several years to enact a tax on sugary beverages with revenue earmarked for a healthcare fund. In 2016, [the tax bill passed both CNMI's House and Senate but was later vetoed by the governor](#). The Conference can play a role in encouraging sugary beverage reduction strategies, such as modifications for NAP and funding pilot incentive/disincentive studies, for CNMI and other regions that wish to pursue these strategies.

3. **Strengthen partnerships between farmers and food assistance programs.** Stakeholders working with the school meals program stated that local produce is provided to students at least once a week. The Conference should consider additional programs and best practices with Indigenous groups that would strengthen nutrition in schools and increase access to culturally meaningful locally grown foods. Further, stakeholders have previously coordinated with farmers to allow their participants to redeem their Cash Value Vouchers (CVV) for fresh fruits and vegetables at farmers markets. This practice ended as a result of the administrative burden to the farmers. The stakeholders believe there is an inability to provide a substantial amount of locally grown fresh produce to CNMI residents. The Conference can encourage local, culturally meaningful, and healthful foods through farm partnerships with federal food assistance programs, including Farmers Market Nutrition Program (FMNP) and school meals.
4. **Strengthen data collection to help inform policies that promote food and nutrition security.** The USDA currently [monitors the prevalence of food insecurity](#) in U.S. households annually, and this data serves to guide the department's federal food assistance programs. However, food insecurity in CNMI is not included in these studies. Inclusion of CNMI data in USDA research can help programs and policies meet residents' needs. Further, there is a need for strengthening data-sharing between NAP retailers and NAP administrators. While retailers share data on which items are purchased in NAP, the data collection methods are not standardized and therefore cannot yield useful analyses. A stronger data collection system can help the administration determine foods purchased and preferred by NAP participants and identify opportunities to provide more healthful options. Transitioning NAP benefits from paper coupons to Electronic Benefit Transfer (EBT) cards would help ease data collection, reduce administrative burden and participant stigma, and attain parity with the [50 US states and four US territories that use EBT](#). (American Samoa, another NAP participant, is the only other inhabited US territory that does not use EBT.)
5. **Increase purchasing power for and affordability of nutrient-dense foods.** The stakeholders were in agreement that nutrition security is a concern for CNMI residents. However, NAP participants are more likely to purchase shelf-stable, unhealthy options because of their affordability and availability. Stakeholders suggest incentivizing fruit and vegetables purchases through NAP, such as through a program similar to USDA's Gus Schumacher Nutrition Incentive Program (GusNIP). The Conference can also play a role in working with the US Department of Interior to reduce the importation costs of nutrient-dense items shipped to CNMI.

Other strategies supported by CNMI stakeholders include expanding NAP eligibility, especially for the substantial number of CNMI residents who are citizens of the Federated States of Micronesia; strengthening the capacity of nonprofit direct service organizations that help support residents' basic needs; transitioning NAP to a SNAP entitlement program rather than a capped block grant, such as through the [Territorial Equity Act](#); providing educational materials about nutrition in public places; extending WIC eligibility for children up to age 6 to ensure food assistance while transitioning to school; and strengthening assistance for underserved populations, such as older adults and people with disabilities.



CSPI and the undersigned CNMI-based partners are ready and willing to work with you to make these priorities a reality. Thank you for the opportunity to share these recommendations with the Conference. If you have any questions about these recommendations, please contact Cassie Harrison-Ramos at [cramos@cspinet.org](mailto:cramos@cspinet.org).

Sincerely,

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Phillip Mendiola-Long  
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<sup>1</sup> CSPI, your food and health watchdog, envisions a healthy population with reduced impact and burden of preventable diseases and an equitable food system that makes healthy, sustainable food accessible to all. CSPI is one of the nation's oldest independent, science-based consumer advocacy organizations.