

August 1, 2013

The Honorable Thomas Vilsack
Secretary of Agriculture
U.S. Department of Agriculture
Jamie L. Whitten Federal Building
1400 Independence Avenue S.W.
Washington D.C. 20250

Dear Secretary Vilsack:

The Supplemental Nutrition Assistance Program (SNAP) is essential to the nation's nutrition safety net. It helps to put food on the table for more than 47 million low-income participants each month. The average SNAP household has an income of only 58.5% of the federal poverty guideline and 83% of all benefits go to households with a child, senior, or disabled person. In times of economic hardship, struggling families depend upon SNAP for access to food. Protecting the integrity and assuring the quality of SNAP guarantees that it will continue to serve as the nation's defense against hunger.

During the Agriculture Reform, Food, and Jobs Act of 2013, Senators Harkin and Coburn filed an amendment that would allow demonstration projects in two states designed to promote healthier food and beverage purchases by SNAP beneficiaries. While that amendment was never taken up by the Senate, USDA already has the authority to allow pilot projects to evaluate innovative approaches to optimizing SNAP purchases. To that end, the undersigned organizations and individuals urge you to use your existing administrative authority to allow states to conduct SNAP pilot projects, similar to the proposed Harkin/Coburn amendment.

Such pilot projects would provide the U.S. Department of Agriculture (USDA) and Congress with data needed to make an informed decision concerning ways to improve the nutritional quality of purchases through the SNAP program. These pilot tests also would provide information about SNAP recipients' perceptions on potential programmatic changes.

USDA has previously recognized the need for data of this nature. In 2007 USDA issued a paper entitled "Implications of Restricting the Use of Food Stamp Benefits"¹ that concluded that: "There is no way to know – other than through carefully designed and evaluated pilot tests – to what extent the proposed restriction would have the desired effect of reducing purchases of foods with limited nutritional value."² States and localities should be given the opportunity to test and evaluate approaches in order to generate data to help USDA make informed decisions to continue to strengthen and optimize SNAP.

¹ USDA, Food and Nutrition Service (Mar. 1, 2007), *available at* <http://www.fns.usda.gov/ora/menu/Published/snap/FILES/ProgramOperations/FSPFoodRestrictions.pdf>.

² *Id.* at 5.

In addition, allowing such demonstration projects would be consistent with the recommendations of the Dietary Guidelines for Americans, the MyPlate nutrition guidance system, and the main goal of USDA's SNAP Education program (SNAP-Ed) 2014 guidance, which reads:

*"... improve the likelihood that persons eligible for SNAP will make healthy food choices within a limited budget and choose physically active lifestyles consistent with the current Dietary Guidelines for Americans and U.S. Department of Agriculture (USDA) food guidance."*³

Therefore, USDA should approve demonstration projects to determine whether modifications of the use of SNAP benefits would impact and optimize purchases, and ultimately consumption patterns, among low-income populations. Granting that permission also would provide USDA with data it has long needed and help resolve the controversy over whether changes to the allowable SNAP purchases are warranted.

Sincerely,

Organizations

Academy of Nutrition and Dietetics
Alameda County Board of Supervisors
American Alliance for Health, Physical Education, Recreation, and Dance
American Heart Association
American Institute for Cancer Research
American Medical Association
American Society of Bariatric Physicians
Association of State & Territorial Health Officials (ASTHO)
Bridgeport Child Advocacy Coalition
California Center for Public Health Advocacy
Campaign for Better Nutrition
Cancer Prevention and Treatment Fund
Center for Communications, Health & the Environment (CECHE)
Center for Science in the Public Interest
ChangeLab Solutions
Consortium to Lower Obesity in Chicago Children (CLOCC)
Day One, Inc.
Defeat Diabetes Foundation
Earth Day Network
Fair Food Network
Farm Sanctuary

Farm to Table New Mexico
Hattie Mae & PALS Foundation
Health Care Without Harm
Health First Wisconsin
Institute for a Sustainable Future
Iowa Public Health Association
Lane Coalition for Healthy Active Youth
Latino Coalition for a Healthy California
LiveWell Colorado
Local Public Health Association of Minnesota (LPHA)
Maricopa County Department of Public Health
Maternity Care Coalition
National Association of Chronic Disease Directors (NACDD)
National Association of County and City Health Officials
National Congress of Black Women, Inc.
National PTA
National WIC Association
New Mexico Food and Agriculture Policy Council
New Mexico Healthier Weight Council
New York State Department of Health
Nutrition First

³ SNAP Ed 2014 Guidance available at <http://snap.nal.usda.gov/snap/Guidance/FY2014SNAP-EdGuidance.pdf>

Ohio Public Health Association
Oklahoma Farm & Food Alliance
Oregon Public Health Institute
Partnership for Prevention
Produce for Better Health Foundation
Progressive Leadership Alliance of Nevada
Public Health Advocacy Institute

Real Food For Kids - Fairfax
Real Food For Kids - Montgomery
Shape Up America!
SuperKids Nutrition Inc.
Washington State Farmers Market
Association

Individuals

Lawrence J. Appel, M.D., M.P.H.
C. David Molina, M.D., M.P.H. Chair in
Medicine
Professor of Medicine, Epidemiology and
International Health (Human Nutrition)
Director, Welch Center for Prevention,
Epidemiology, and Clinical Research
Johns Hopkins Medical Institutions

Frank J. Chaloupka, Ph.D.
University of Illinois at Chicago, Institute
for Health Research and Policy

Nancy Huehnergath
President
Nancy F. Huehnergath Consulting

Rachel K. Johnson, Ph.D., M.P.H., R.D.,
FAHA
Robert L. Bickford, Jr. Green and Gold
Professor of Nutrition
Professor of Medicine
The University of Vermont

Scott Kahan, M.D., M.P.H.
Faculty, George Washington University
Schools of Medicine
and Public Health and the Johns Hopkins
Bloomberg School of Public Health

David L. Katz, M.D., M.P.H., FACPM,
FACP
Yale University Prevention Research Center

James Krieger, M.D., M.P.H.
Chief, Chronic Disease and Injury
Prevention Section
Public Health - Seattle and King County

Susan T. Mayne, Ph.D.
C.-E.A. Winslow Professor of Epidemiology
Chair, Dept. of Chronic Disease
Epidemiology
Yale School of Public Health
Associate Director, Yale Cancer Center

Marion Nestle, Ph.D., M.P.H.
Paulette Goddard Professor
Department of Nutrition, Food Studies, and
Public Health
New York University

Professor Robert Paarlberg
Wellesley College

Xavier Pi-Sunyer, M.D., M.P.H.
Director of New York City Obesity
Research Center
Chief of Endocrinology, St. Luke's
Roosevelt Hospital

Barry M. Popkin, Ph.D.
W. R. Kenan, Jr. Distinguished Professor
School of Public Health
Carolina Population Center
University of North Carolina at Chapel Hill

Eric Rimm, ScD
Associate Professor of Medicine
Harvard Medical School
Channing Division of Network Medicine
Brigham and Women's Hospital

Frank M. Sacks, M.D.
Professor of Cardiovascular Disease Prevention,
Nutrition Department, Harvard School of Public Health
Professor of Medicine, Harvard Medical School and
Brigham & Women's Hospital

Meir Stampfer, M.D., DrPH
Professor of Medicine, Harvard Medical School
Professor of Epidemiology and Nutrition,
Harvard School of Public Health
Assoc Director, Channing Division of Network Medicine
Department of Medicine, Brigham and Women's Hospital

Mary Story, Ph.D., R.D.
Professor, Division of Epidemiology and Community Health
Senior Associate Dean for Academic and Student Affairs
School of Public Health
University of Minnesota

Y. Claire Wang, M.D., ScD
Assistant Professor, Department of Health Policy & Management
Mailman School of Public Health
Columbia University

Walter Willett, M.D., Dr. P.H.
Professor and Chair, Department of Nutrition
Harvard School of Public Health

Lisa R. Young, Ph.D., R.D.
Adjunct Professor of Nutrition
New York University

*Please reply to Julie Greenstein, Center for Science in the Public Interest; 1220 L St. NW, Suite 300,
Washington, DC 20005; jgreenstein@cspinet.org; (202) 777-8331