

**Appendix L**  
**Public Submission Comment 2**

Secretary of Agriculture, Tom Vilsack  
U.S. Department of Agriculture  
1400 Independence Ave., S.W.  
Washington, DC 20250

July 26th, 2022

Comments regarding Senior Farmers' Market Nutrition Program (SFMNP), Federal Register  
Notice, 87 FR 32116

Dear Secretary Vilsack,

We were pleased to see the announcement of the USDA's Framework for shoring up the food supply chain and transforming the food system to be more fair, competitive, and resilient. Communities across the country continue to face supply chain disruptions from the COVID-19 pandemic, further exacerbated by Russia's war in Ukraine. We applaud the agency's commitment to addressing the longstanding structural challenges that were revealed and intensified by the pandemic.

While the organizations included in this letter share a commitment and desire to strengthen the food system across the supply chain, today we write to you in response to the additional \$50 million allocated for the Senior Farmers Market Nutrition Program (SFMNP), which provides low-income seniors with coupons that can be exchanged for locally grown produce at farmers' markets, roadside stands, and Community Supported Agriculture (CSA) programs.

The SFMNP is an important program for direct-marketing farmers and the communities they serve. Providing more than healthy food for elders and additional income for small food producers, it is also a powerful tool for reducing senior isolation. Through this program, older adults are connected with farmers, see their neighbors, and interact with their communities. The recent announcement of an additional investment in the SFMNP will help to expand access to markets for a diversity of growers while equipping additional consumers with access to healthy foods at farmers markets across the nation.

We, the undersigned national, state, and local organizations, respectfully request the following recommendations be considered for implementation of the additional \$50 million allocated for this program as announced by Secretary Vilsack at the June 1, 2022 Framework for Shoring Up the Food Supply Chain and Transforming the Food System to Be Fairer, More Competitive, More Resilient:

### **1.Re-evaluate the current funding allocation to achieve a more equitable distribution.**

The current SFMNP funding formula does not align with state poverty rates, leading to significant inequity in the allocation of funds. Based on poverty data, there is a disproportionate and inequitable allocation of funds. For example, in FY21 Texas received less than %0.50 of the current SFMNP allocation despite being home to 10% of the nation's adults over the age of 65 living in poverty. We suggest that in order to have a distribution of funds that more accurately reflects need, the additional \$50 million be used to ensure that all states receive an allocation that (at a minimum) reflects a standard equation based on poverty rates. There are sufficient funds to increase allocation to states that are currently under-resourced as well as ensuring all states have sufficient funding for the capacity to manage these programs, while not taking away funds from states that may be “over” allocated using this approach. Please see an example of such an allocation, [here](#).

### **2. Continue to offer flexibility in the voucher model and delivery method.**

The SFMNP allows up to 50% of the funds to be used on Community Supported Agriculture (CSA) shares or bulk food purchases. This flexibility has provided states the opportunity to find innovative solutions and partnerships that can be tailored to the unique needs of diverse communities. This allows states and communities to explore which voucher model, including paper checks, coupons, or electronic benefits, is critical for maximizing efficiency and effectiveness of the program. We recommend extending flexibility to states through waivers to the 50% cap in order to maximize access and utilization in states with deeply rural and isolated mountain communities, and in areas with very limited farmers market infrastructure. Bulk purchasing should continue to be allowed only from direct market operations or local food aggregators that purchase directly from farms, including farms, CSAs, farmers markets, and food hubs.

Additionally, while we support funding to explore technology solutions for electronic benefit delivery for SFMNP, creating equity in the allocation formula is our **top priority**. We hope to engage USDA and Congress on issues related to electronic benefit system testing in upcoming farm bill discussions, comments, and listening sessions, in coordination with ongoing technology efforts, such as the SNAP Online Purchasing Pilot, for a more comprehensive approach to electronic benefit solutions.

### **3. Increase allowed administrative costs to support better access for hard-to-reach communities.**

Our combined experience with the SFMNP has led us to recognize that innovative transportation solutions and additional technical assistance are needed in order to increase access in geographically hard-to-reach communities, including rural and tribal areas. Additional resources to meet the needs of these communities in the form of administrative funds would help to ensure that more seniors and growers can participate in this program and further shore up our regional

food system. Even a small amount of increased investment can greatly increase reach, and thus, consumption. In Colorado, a nominal \$5 per share empowered a CSA program to deliver weekly produce directly to isolated households. Increasing the administrative cost cap from 10% to 15% would allow states more flexibility and innovation to reach underserved communities and further advance equity in the program.

We, the undersigned agriculture, nutrition, and public health organizations thank you again for the opportunity to share our thoughts and perspectives on how the USDA can shore up the food system through infrastructure and equity improvements in the SFMNP. These recommendations will provide the basis of our recommendations for permanent improvements through the farm bill as well. If implemented swiftly, the recently announced additional investment can begin to fund and model significant improvements to the program. We are committed to working with you to make these suggestions a reality for SFMNP stakeholders, and stand by to support the USDA in its work for a fairer, more competitive, and more resilient food system.

Sincerely,

Nourish Colorado, CO

Wholesome Wave, CT

Community Alliance With Family Farmers (CAFF), CA

Ohio Ecological Food and Farm Association, OH

Illinois Stewardship Alliance, IL

National Sustainable Agriculture Coalition

Farmers Market Coalition

West Virginia Food & Farm Coalition, WV

National Young Farmers Coalition

Community Involved in Sustaining Agriculture (CISA), MA

Garfield County Dept. of Human Services Senior Programs, CO

Food Animal Concerns Trust (FACT), IL

Routt County Council on Aging, CO

Kansas Rural Center, KS

Pinnacle Prevention, AZ

Virginia Fresh Match, VA