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Agency Information Collection Activities: Supplemental Nutrition Assistance Program: Reporting of Lottery and Gambling, and Resource Verification

Comment On: FNS-2025-0038-0001

Agency Information Collection Activities; Proposals, Submissions, and Approvals: Reporting of Lottery and Gambling, and Resource Verification

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Submitter Information

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General Comment

Notice Title:

Agency Information Collection Activities: Supplemental Nutrition Assistance Program: Reporting of Lottery and Gambling, and Resource Verification

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Agency: U.S. Department of Agriculture – Food and Nutrition Service

Date Submitted: August 5, 2025

Comment Deadline: August 11, 2025

Comment:

To Whom It May Concern,

In response to the request for comment on the continued information collection concerning Supplemental Nutrition Assistance Program (SNAP) eligibility and the reporting of lottery/gambling income and resource verification, I respectfully submit the following recommendation: that USDA consider incorporating carbon dioxide (CO₂) and other climate-relevant data into its program-level assessments, especially as they pertain to program delivery logistics, supply chains, and technology systems.

While this notice focuses on eligibility verification and fraud prevention, the broader SNAP infrastructure—encompassing EBT systems, supply chain partnerships, retail coordination, and data management—presents material intersections with greenhouse gas emissions. Key considerations include:

Digital Infrastructure Emissions:

The expansion and modernization of verification systems involve cloud storage, data centers, and

financial transaction networks. These systems contribute indirectly to CO₂ emissions depending on electricity sources and vendor sustainability practices.

Interagency Coordination and Travel:

Investigations or verifications may require physical visits or coordination between multiple jurisdictions. Modifications to reporting thresholds and resource assessments could affect the volume of in-person audits or field verifications, potentially shifting the carbon intensity of program enforcement.

Resilient Program Design in a Changing Climate:

SNAP is a frontline federal response to household hardship. As climate change increasingly impacts low-income populations, integrating climate-resilience metrics or carbon-conscious planning into program architecture supports long-term sustainability and equity.

Future-Ready Program Management:

Even though Executive Orders 13990 and 14008 have been revoked, USDA continues to face pressure—both internal and external—to consider climate-informed governance across all agencies. Adding optional or indirect indicators of environmental performance could provide early insight without burdening program integrity.

Recommendation:

As part of SNAP information collection and modernization initiatives, USDA should explore pathways for voluntary or indirect reporting on the carbon intensity of systems and operations that support eligibility determination and benefit delivery. This may include data processing efficiency, geographic logistics, and procurement decisions.

Such action would align with a broader federal commitment to transparency, environmental stewardship, and responsible administration of safety net programs.

Thank you for the opportunity to provide input on this important matter.

Sincerely,

A Concerned Citizen

Submitted Anonymously

Date: August 5, 2025