



Brandon Lipps
Deputy Under Secretary
Food, Nutrition and Consumer Services
United States Department of Agriculture
1400 Independence Ave SW
Washington DC 20250

Dear Mr. Lipps,

In a letter dated March 11, 2019, 374 organizations provided USDA Food and Nutrition Service (FNS) with documentation of the status of wireless EBT provision in many states, an analysis of the various systems in use, and specific recommendations for the use of FY 2019 appropriated funds provided by Congress to the agency to facilitate SNAP use in farmers markets. The recommendations were informed by conversations with more than 20 state agencies, the American Public Human Services Association (APHSA), the National Association of State Departments of Agriculture (NASDA), electronic payment companies, expert members of the e-Government Payments Council, and hundreds of farmers markets. It was based on the most thorough information gathering ever done of the mobile farm direct SNAP payment landscape and the policy approach suggested reflected an almost unanimous consensus among those very diverse sectors.

Several representatives of the group had the opportunity to meet with FNS staff on March 28th and were told that the agency was seriously considering our proposal. There was no further communication until FNS' publication of the recent solicitation on July 15, 2019.

We were surprised to see FNS pursue the strategy outlined in the most recent solicitation as it makes no reference to the input provided in the March letter and charts a course for the next 4 years that appears to be a much less effective approach.

Additionally we have the following concerns about the solicitation both in terms of approach and execution:

- The Solicitation as outlined will lock in one app as the only option supported by federal funds. Markets have different needs and one app will not support the needs of all markets in all communities
- For many markets the need for support goes beyond one year of app licensing. The additional costs that must be undertaken by a market to operate SNAP equipment will present a barrier for many farmers markets and direct marketing farmers

- The solicitation criteria for the app appear so narrow as to limit the apps to only one that meets the criteria listed in the solicitation
- Questions posed to FNS regarding the solicitation went unresponded to for a full month. When we did receive a response to our questions, the answer did not provide additional information and only referred us back to the solicitation. The lack of timely information has prevented us from having adequate time and information to respond to the solicitation

We would greatly appreciate a response to our initial letter explaining why FNS chose not implement our recommendations and why instead FNS believes that the solicitation represents a better approach to addressing SNAP access for farmers markets and direct marketing farmers.

Sincerely,



Ben Feldman
Interim Executive Director
Farmers Market Coalition

CC: Maggie Lyons,
Pam Miller,
Joseph Tvrdy,
Jessica Shahin,
Jeffrey Cohen,
Andrea Gold

Academy of Nutrition and Dietetics
American Heart Association
American Public Human Services Association
Fair Food Network
Farm Aid
Farmers Market Coalition
Johns Hopkins Center for a Livable Future
National Association of State Departments of Agriculture
National Center for Appropriate Technology
National Center for Frontier Communities
National Farmers Union
National Recreation and Park Association
National Sustainable Agriculture Coalition
National Young Farmers Coalition
Public Health Institute

Share Our Strength
Slow Food USA
The Food Trust
Union of Concerned Scientists
Wholesome Wave

Community Food Bank of Central Alabama, Alabama
Food Bank of North Alabama, Alabama
Alaska Farmers Market Association, Alaska
Homer Farmers Market, Alaska
Kenai Local Food Connection, Alaska
Kenai Soil & Water Conservation District, Alaska
Meyers Farm Bethel, Alaska
Sitka Local Foods Network, Alaska
Willow Farmers Market, Alaska
Pima County Food Alliance, Arizona
Pinnacle Prevention, Arizona
Arkansas Coalition for Obesity Prevention, Arkansas
Arkansas Farmers Market Association, Arkansas
Arkansas Hunger Relief Alliance, Arkansas
DTR Market, Arkansas
Fayetteville Farmers Market, Arkansas
Little Rock Farmers Market, Arkansas
Main Street Siloam Springs, Arkansas
Russellville Community Market, Arkansas
Agricultural Institute of Marin, California
Center for Urban Education about Sustainable Agriculture, California
East Hollywood Certified Farmers' Market, California
Ecological Farming Association, California
Ecology Center, California
Eden Area Food Alliance, California
Interfaith Sustainable Food Collaborative, California
Jefferson Economic Development Institution , California
Pacific Coast Farmers' Market Association, California
Rancho Santa Fe Farmers Market, California
Slow Food California, California
Torrance Certified Farmers' Market, California
4th Street Food Store, Colorado
ACRES @ Warren Tech, Colorado
Alamosa Farmers' Market, Colorado
Any Street Grocery, Colorado
Berthoud Local, Colorado
Boulder County Public Health, Colorado

Canon City Farmers Market, Colorado
Children's Hospital Colorado, Colorado
Colorado Farm and Art Market, Colorado
Colorado Farmers Market Association , Colorado
Colorado Springs Food Rescue, Colorado
Community Table Farm LLC, Colorado
Cortez Farmers Market, Colorado
Crested Butte Farmers Market, Colorado
Denver Urban Gardens, Colorado
Double Up Food Bucks Garfield County, Colorado
Downtown Grand Junction Market on Main, Colorado
Farm Runners, Colorado
Fresh Food Hub, Colorado
Glenwood's Downtown Market, Colorado
GoFarm, Colorado
Hanagan Farms, Colorado
Hunger Free Colorado, Colorado
Jefferson County Public Health, Colorado
Kelly Enterprises LTD, Colorado
Larimer County Farmers' Market, Colorado
LiveWell Colorado, Colorado
Mancos Farmers Market, Colorado
Manna - The Durango Soup Kitchen, Colorado
Miller Farms, Colorado
Mo' Betta Green MarketPlace, Colorado
Monte Vista Farmers Market, Colorado
Montrose Farmers Market, Colorado
Nederland Farmers Market, Colorado
Plateau Valley Farmers Market, Colorado
Raisin' Roots Farm, Colorado
Rifle Farmers Market, Colorado
San Luis Valley Foods Coalition, Colorado
Share Our Strength, Colorado
Skip's Fark to Market, Colorado
Sprout City Farms, Colorado
Star Acre Farms, Colorado
The Co-op at 1st, Colorado
The Growing Project, Colorado
Danbury Farmers' Market Community Colloborative, Connecticut
Ellington Farmers Market Inv, Connecticut
Historic Lewes Farmers Market, Delaware
Community FoodWorks, District of Columbia
Mount Pleasant Farmers' Market, District of Columbia

Petworth Community Market, District of Columbia
Center for Sustainable Development at University of the District of Columbia, District of Columbia
Ward 8 Farmers Market, District of Columbia
Bradenton Farmers' Market, Florida
Feeding Florida, Florida
Root & Tail Farm , Florida
Sharon L Yeago, LLC, Florida
SW Community Farmers' Market, Inc., Florida
Dublin Main Street Program, Georgia
East Point Farmers Market , Georgia
Lilburn Farmers Market, Georgia
Little Ones Learning Center , Georgia
Peachtree Road Farmers Market, Georgia
Serenbe Farmers Market, Georgia
Wholesome Wave Georgia, Georgia
Blue Zones Project - Sharecare, Hawaii
Community First, Hawaii
GreenWheel Food Hub, Hawaii
Hawaii Appleseed Center for Law and Economic Justice, Hawaii
Hawaii Children's Action Network, Hawaii
Healthy Eating + Active Living Coalition, Hawaii
Lanakila Pacific, Hawaii
Project Vision Hawai`i, Hawaii
Sustainable Molokai, Hawaii
Waianae Coast Comprehensive Health Center, Hawaii
Donnelly Farmers Market, Idaho
Emmett Farmers Market, Idaho
Farmers' Market at Sandpoint, Idaho
Grangeville Farmers Market, Idaho
Homedale Farmers Market, Idaho
Idaho Farmers Market Association, Idaho
Nampa Farmers Market, Idaho
Orofino Farmers Market, Idaho
Raspberry Patch, Idaho
Rexburg Farmer's Market, Idaho
Wood River Farmers Market, Idaho
City of Aurora, Illinois
DeKalb Farmers' Market, Illinois
Experimental Station, Illinois
Geneva Green Market, Illinois
Illinois Stewardship Alliance, Illinois
Northbrook Farmers Market Association, Illinois

Oak Park Farmers' Market, Illinois
Urbana's Market at the Square, Illinois
Linton Farmers Market, Indiana
New Albany Farmers Market, Indiana
Frakes Family Farm, Iowa
Freight House Farmers Market, Iowa
Healthy Harvest of North Iowa, Iowa
Allen County Farmers' Market, Kansas
Emporia Farmers Market , Kansas
Kansas Rural Center, Kansas
Walnut Valley Farmers Market, Kansas
Community Farm Alliance, Kentucky
Louisiana Budget Project, Louisiana
North Louisiana Farm Fresh , Louisiana
Central Maine Health Care, Maine
Healthy Communities of the Capital Area, Maine
Maine Farm to School Network, Maine
Maine Federation of Farmers' Markets, Maine
Peacemeal Farm, Maine
Sanford Farmers' Market, Maine
Benefit Manufacturing, LLC, Maryland
Crossroads Community Food Network, Maryland
Druid Hill Farmers Market , Maryland
Fair Farms, Maryland
Hyattsville Farmers Market, Maryland
Montgomery County Community Action Board, Maryland
Montgomery County Food Council, Maryland
Susan Kornacki, Maryland
Central Mass Grown, Massachusetts
Community Involved in Sustaining Agriculture, Massachusetts
Farm to Institution New England, Massachusetts
Federation of Mass Farmers Markets, Massachusetts
Fresh Advantage LLC, Massachusetts
Groundwork Lawrence, Massachusetts
Marshfield Farmers Market, Massachusetts
Mass Farmers Markets, Massachusetts
Massachusetts Food System Collaborative, Massachusetts
Mattapan Food and Fitness Coalition, Massachusetts
New England Farmers Union, Massachusetts
Northeast Organic Farming Association - MA Chapter, Massachusetts
Shape Up Somerville, Massachusetts
Southeastern Ma Food Security Network , Massachusetts
Sustainable CAPE, Massachusetts

Sustainable Nantucket, Massachusetts
Union Square Farmers Market, Massachusetts
West Elm Farm, Massachusetts
Worcester County Food Bank, Massachusetts
Deeply Rooted Produce, Michigan
Downtown Saginaw Farmers' Market, Michigan
Groundwork Center for Resilient Communities, Michigan
Lincoln Park Farmers Market, Michigan
Michigan Farmers Market Association , Michigan
St. Louis Farmers Market, Michigan
Hunger Solutions Minnesota, Minnesota
Mill City Farmers Market, Minnesota
Prairie Horizons Farm LLC, Minnesota
Renewing the Countryside, Minnesota
Rutabaga Project, Minnesota
Ullands Timeless Garden, Minnesota
A Red Circle, Missouri
Columbia Farmers Market, Missouri
Cultivate KC, Missouri
De Soto Farmers' Market, Missouri
Farmers Market of The Ozarks, Missouri
Hickory County Farmers Market, Missouri
Joplin Empire Market, Missouri
L&R Farms, Missouri
Marshfield Farmers Market, Missouri
Midwest Association of Farmers Markets, Missouri
Missouri Council for Activity & Nutrition, Missouri
Sedalia Area Farmers' Market, Missouri
Smythe Consults, Missouri
South St. Joseph Development Corporation, Missouri
Tower Grove Farmers' Market, Missouri
Webb City Farmers Market, Missouri
Community Food and Agriculture Coalition, Montana
Havre Area Chamber of Commerce, Montana
Troy Farmers Market, Montana
Bloomin' Desert Herb Farm , Nevada
Carson Farmers Market, Nevada
fresh52 Farmers & Artisan Market, Nevada
Governor's Council on Food Security, Nevada
Healthy Communities Coalition, Nevada
Medical Scientific Resources of Nevada, Inc., Nevada
Molly Pop Farms, Nevada
NevadaGrown, Nevada

Southern Nevada Food Council, Nevada
Three Square, Nevada
Together We Can, Nevada
Gorhan Public Health Consulting, New Hampshire
Seacoast Eat Local, New Hampshire
East Orange Farmers Market, New Jersey
New Jersey YMCA State Alliance, New Jersey
Ramsey Farmers' Market, New Jersey
Virtua Mobile Farmers Market, New Jersey
Farm to Table, New Mexico
New Mexico Farmers' Marketing Association, New Mexico
New Mexico Food & Agriculture Policy Council, New Mexico
Santa Fe Farmers' Market Institute , New Mexico
Comfort Food Community, New York
Cornell Cooperative Extension Tompkins County, New York
Dutchess Outreach, New York
Field & Fork Network, New York
Food For All, New York
Hunger Action Network of New York State, New York
Just Food, New York
Northeast Sustainable Agriculture Working Group, New York
Davidson Farms Market , North Carolina
Durham Farmers' Market, North Carolina
Feast Down East, North Carolina
Foothills Farmers' Market, North Carolina
Forsyth Foodworks, North Carolina
Mobile Oasis Farmers Market, North Carolina
MountainWise, North Carolina
Reinvestment Partners, North Carolina
Rural Advancement Foundation International-USA, North Carolina
The Corner Farmers Market, North Carolina
ACEnet, Ohio
Asian Services in Action, Inc. , Ohio
Clintonville Farmers' Market, Ohio
Countryside, Ohio
Farmers Market Association of Toledo, Ohio
Foraged & Sown Farm, Ohio
Good Earth Farm, Ohio
Haymaker Farmers' Market, Ohio
Kamm's Corners Farmers Market, Ohio
Neo Restoration Alliance , Ohio
North Union Farmers Market, Ohio
Old Brooklyn Farmers Market, Ohio

Produce Perks Midwest, Inc., Ohio
Slvic Village Development, Ohio
Summit Food Coalition, Ohio
The Coit Road Farmers' Market, Ohio
Trumbull Neighborhood Partnership, Ohio
Tuscarawas Valley Farmers Market , Ohio
Cave Junction Farmers Market, Oregon
Corvallis-Albany Farmers' Markets, Oregon
Early Owl Farm , Oregon
Fresh & Local, First!, Oregon
Hillsboro Farmers' Markets, Inc., Oregon
Hillsdale Farmers' Market, Oregon
Klamath Falls Farmers Market Association, Oregon
Lebanon Farmers Market, Oregon
Montavilla Farmers Market, Oregon
Oregon Farmers Markets Association, Oregon
Oregon Food Bank, Oregon
Spencer Creek Growers Markets, Oregon
Territorial Road Orchard, Oregon
Whiteaker Community Market, Oregon
Adagio Health, Pennsylvania
Adams County Farmers Market Association, Inc., Pennsylvania
Adams County Food Policy Council, Pennsylvania
Bloomfield Development Corporation, Pennsylvania
Buy Fresh Buy Local of the Greater Lehigh Valley, Pennsylvania
Chester County Food Bank, Pennsylvania
Easton Farmers' Market, Pennsylvania
Erie Food Policy Advisory Council, Pennsylvania
Greater Pittsburgh Community Food Bank, Pennsylvania
Just Harvest, Pennsylvania
Lancaster East Side Market, Pennsylvania
PA Farm Markets, Pennsylvania
Pittsburgh Food Policy Council, Pennsylvania
Weavers Way Cooperative Association, Pennsylvania
Farm Fresh Rhode Island, Rhode Island
Rhode Island Food Policy Council, Rhode Island
Rhode Island Public Health Insitute, Rhode Island
Hub City Farmers Market, South Carolina
North Charleston Farmers Market, South Carolina
Town of Ridgeland, South Carolina
Union County Farm & Craft Market, South Carolina
Dakota Rural Action, South Dakota
Depot Street Farmers Market-Greeneville, Tennessee

Kingsport Farmers Market, Tennessee
Lookout Farmers market, Tennessee
Main St Farmers Market, Tennessee
Morristown Farmers Market, Tennessee
Union County Farmers Market, Tennessee
Baylor University's Texas Hunger Initiative, Texas
Central Texas Young Farmers Coalition, Texas
F2M Texas dba Texas Farmers' Market, Texas
Farm Force , Texas
Good Local Markets, Texas
GROW North Texas, Texas
Juicy Lucy's Farms , Texas
Peach Street Farmers Market, Texas
San Antonio Food Bank, Texas
Sustainable Food Center, Texas
Texas Certified Farmers Market Corporation, Texas
Texas Organic Farmers and Gardeners Association, Texas
Urban Harvest, Inc. , Texas
Waco Downtown Farmers Market, Texas
West Texas Growers & Producers Association, Texas
Wild West Farmers Market, Texas
Wolf Creek Farms Neighborhood Market, Texas
Historic Brigham City, Utah
Liberty Park Market, Utah
Urban Food Connections of Utah, Utah
Utahns Against Hunger, Utah
Brattleboro Winter Farmer's Market, Vermont
Champlain Islands Farmers' Market, Vermont
Jericho Farmers Market, Vermont
Northwest Farmers' Market, Inc., Vermont
Norwich Farmers Market, Vermont
Vermont Farmers Market Association, Vermont
Carytown Farmers Market, Virginia
Good Phyte Foods, LLC, Virginia
Market Central, Inc., Virginia
Narrows Farmers Market, Virginia
Office of School Nutrition, Virginia Department of Education, Virginia
River Street Market, Virginia
The Old Town North Community Partnership , Virginia
Virginia Association for Biological Farming, Virginia
Virginia Department of Veteran Services, Virginia
Virginia Farmers Market Association, Virginia
Bow Farmers Market, Washington

Centralia Farmer's Market, Washington
Des Moines Waterfront Farmers Market, Washington
Duvall Farmers Market, Washington
Emerson-Garfield Farmers' Market, Washington
Newport Farmers Market, Washington
Olde Achres Farm, Washington
Queen Anne Farmers Market, Washington
Tumwater Town Center Farmers Market, Washington
Wahluke Farmers Market, Washington
Charles Town Farmers Market, West Virginia
West Virginia Food & Farm coalition, West Virginia
Boscobel Farmers Market, Wisconsin
Kenosha Common Markets, Wisconsin
Monroe Farmers Market, Wisconsin
Sheboygan County Interfaith Organization, Wisconsin
Wisconsin Farmers Market Association, Wisconsin
Gillette Saturday Farmers' Market, Wyoming
Wyoming Food for Thought Project, Wyoming