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CREATED BY GUSNIP NTAE CENTER

February 5, 2021

Carrie Castille, PhD, MS  
Director  
National Institute of Food and Agriculture  
United States Department of Agriculture  
1400 Independence Avenue, SW, MS 2201  
Washington, DC 20250-2201

Dear Dr. Castille:

The nutrition incentive community is deeply appreciative of the dedication of U.S. Department of Agriculture (USDA) National Institute of Food and Agriculture (NIFA) staff working to develop the Gus Schumacher Nutrition Incentive Program (GusNIP) FY2021 Request for Applications (RFA). The clarifying updates made to the RFA and Frequently Asked Questions (FAQ) have been helpful and well received.

However, in the course of our technical assistance support to the community, there is one specific update to the FY2021 RFA which has generated a wave of concern and confusion among grantees and applicants. This update is very likely to dramatically decrease the qualified applicant pool, eliminate eligibility for many current grantees' future projects, and potentially leave significant GusNIP funding unspent.

At the bottom of page 17, the FY2021 RFA added a new but significant statement, "GusNIP allows the use of incentives only for qualifying fruits and vegetables. Incentives cannot be used for purchase or redemption of any other SNAP eligible food."

**The new language runs contrary to both the Agricultural Improvement Act of 2018 (Farm Bill) statutory language and other language in the FY2021 RFA, which state that "buy-produce-get-produce" program designs should be given *priority* for funding but not required.**

The new language also represents a stark reversal of six years of FINI/GusNIP policy and would substantially hinder almost all farmers' markets currently in operation from receiving GusNIP funds for their nutrition incentive programs. This language would also preclude several brick-and-mortar (grocery) firms and well-established statewide

projects, including the California Fruit and Vegetable EBT Pilot Project and Market Match Program (which alone represents 288 firms and \$9.7M impact), from qualifying for GusNIP funds.

After a similar issue arose in the original FY2019 and FY2020 GusNIP RFAs, NIFA and FNS issued modified RFAs and FAQs allowing for three models of incentive disbursement and redemption as follows:

*Under the GusNIP grant program there are three (3) allowable models for incentive disbursement and redemption. These three allowable models are:*

- 1. Any food for F/V: Supplemental Nutrition Assistance Program (SNAP) households purchase any SNAP eligible food using their SNAP benefits and then these households receive incentives that are redeemable only for the purchase of GusNIP qualifying fruits or vegetables.*
- 2. F/V for any food: SNAP households purchase GusNIP qualifying fruits or vegetables using their SNAP benefits and then these households receive incentives that are redeemable for the purchase of any SNAP eligible food.*
- 3. F/V for F/V: SNAP households purchase GusNIP qualifying fruits or vegetables using their SNAP benefits and then these households receive incentives that are redeemable only for the purchase of GusNIP qualifying fruits or vegetables. This model is preferred.*

To help ensure the continued success of existing programs and prevent the interruption of millions of dollars in nutrition incentives to vulnerable families during this time of crisis, we respectfully request that the RFA be amended to incorporate the language from the FY2019 FAQ above, and thus more accurately reflect the statutory language of the Farm Bill. Please find an annotated copy of the relevant legislative language from the 2018 Farm Bill attached.

Lastly, attention to this issue has extended beyond the immediate nutrition incentive practitioner community. Several organizations, including but not limited to practitioners of incentive programs, expressly requested representation in this communication to help underscore the breadth of concern. Their names are included, below.

Please let us know if you require additional information or if we can answer any questions.

Thank you,



Holly Parker, MPP

Project Lead of Technical Assistance at the GusNIP NTAE's Nutrition Incentive Hub

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## Organizational signatories

Arkansas Coalition for Obesity Prevention (Greenbriar, AR)  
Blue Ridge Women in Agriculture (Boone, NC)  
City Green, Inc. (Clifton, NJ)  
Community Involved in Sustaining Agriculture (CISA) (South Deerfield, MA)  
Crossroads Community Food Network (Takoma Park, MD)  
Ecological Farming Association (EcoFarm) (Soquel, CA)  
Ecology Center (Berkeley, CA) (lead organization for the Statewide Market Match Program)  
Experimental Station (Chicago, IL)  
Farmers Market Coalition (Albany, CA)  
Farmers Market Fund (Portland, OR)  
Farm Fresh Rhode Island (Providence, RI)  
Farm to Table - New Mexico (Santa Fe, NM)  
Feeding Florida (Tallahassee, FL)  
Field & Fork Network (Buffalo, NY)  
FreshFarm (Washington, DC)  
Hawai`i Island's Food Basket (Hilo, HI)  
Hawai'i Appleseed Center for Law and Economic Justice (Honolulu, HI)  
Hopkinton Harvest, Inc dba Hopkinton Farmers Market (Hopkinton, MA)  
Hunger Task Force (Milwaukee, WI)  
Illinois Farmers Market Association (North Aurora, IL)  
Johns Hopkins Center for a Livable Future (Baltimore, MD)  
Maine Farmland Trust (Belfast, ME)  
Maine Federation of Farmers' Markets (Freeport, ME)  
Michigan Farmers Market Association (East Lansing, MI)  
Minnesota Farmers' Market Association (Nerstrand, MN)  
Montana Organic Association (Missoula, MT)  
National Grocers Association (Washington, DC)  
National Sustainable Agriculture Coalition (Washington, DC)

New Hampshire Food Bank (Manchester, NH)  
Nourish Colorado (Denver, CO)  
Ohio Ecological Food and Farm Association (Columbus, OH)  
Ohio Farmers Market Network (Toledo, OH)  
Oregon City Farmers Market (Oregon City, OR)  
Oregon Farmers Markets Association (Salem, OR)  
Oregon Food Bank (Portland, OR)  
Pinnacle Prevention (Chandler, AZ)  
Produce Perks Midwest, Inc. (Cincinnati, OH)  
Rural Advancement Foundation International-USA (Pittsboro, NC)  
Seacoast Eat Local (Dover, NH)  
SPUR (San Francisco, CA)  
Sustainable Food Center (Austin, TX)  
The Food Trust (Philadelphia, PA)  
Virginia Community Food Connections (Fredericksburg, VA)  
Virginia Fresh Match Network  
Wholesome Wave Georgia (Atlanta, GA)

CC:

J. Mark Carter, PhD, Division Director for Food Safety, USDA NIFA

Mallory M. Koenings, PhD, RDN, National Program Leader, Division of Nutrition, USDA NIFA

Amy Yaroch, PhD, Director, GusNIP NTAE and Lead of Evaluation at the GusNIP NTAE's Nutrition Incentive Hub and Executive Director, Gretchen Swanson Center for Nutrition

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