



May 12, 2017

Jessica Shahin, Acting Administrator
Food and Nutrition Service
United States Department of Agriculture
3101 Park Center Drive
Alexandria, VA 22302

Dear Ms. Shahin,

The United Fresh Produce Association is a strong supporter of the Food Insecurity Nutrition Incentives (FINI) grant program. We believe that FINI, when effectively implemented, is an important strategy to help low-income consumers participating in SNAP increase their purchase, and consumption, of fruits and vegetables. We compliment the Food and Nutrition Service (FNS) and National Institute for Food and Agriculture (NIFA) for their commitment and collaboration in launching FINI following passage of the 2014 Farm Bill.

However, United Fresh also believes that changes need to be made to the 4th FINI Request for Applications (RFA), and to future RFAs, to better align FINI with strengthening nutrition for SNAP participants. We suggest that more priority needs to be placed on funding FINI projects where SNAP participants shop, where they have access to a wide variety of fruits and vegetables year round, and where they can earn/redeem produce incentives year round.

To date, the majority of FINI projects have been funded in venues that are seasonal, have low SNAP redemptions, and where SNAP participants can only earn/redeem produce incentives for a few months of the year. SNAP participants need to significantly increase their fruit and vegetable consumption every day and every season of the year to improve the quality of their diet and to improve their health. To achieve this objective, United Fresh strongly believes that USDA must make it a priority to fund more FINI projects in supermarkets and traditional grocery stores where SNAP participants do the majority of their shopping.

United Fresh recommends that FNS consider making the following changes to the 4th FINI RFA:

1. **Prioritize funding more FINI projects with supermarkets where SNAP participants have access to a wide variety of fruits and vegetables and can earn/redeem produce incentives year round.**

SNAP participants spend 80% of their SNAP benefits in supermarkets. And, supermarkets provide access to a wide variety of fruits and vegetables and the opportunity to earn/redeem produce incentives year round. As the goal of FINI is to increase the purchase of fruits and vegetables by low-income consumers participating in SNAP, expanding FINI to more supermarkets must be a strong objective.

To date, FINI has leaned heavily toward funding Farmers Markets and local agriculture. Over 1,000 Farmers Markets have received FINI funding even though they have historically low SNAP redemptions and most often only operate seasonally. Additionally, most of the supermarket FINI projects that have been funded only provide benefits seasonally when local produce is available. Local, seasonal produce is great and we support more EBT at Farmers Markets; but the disproportionate amount of FINI projects funded in Farmers Markets and linked to local/seasonal produce is not helping SNAP families for the majority of the year. We suggest a rebalancing with priority given to funding projects in supermarkets where SNAP participants shop, that provide a wide variety of fresh fruits and vegetables, and where incentives can be earned/redeemed year round.

2. Remove the “trigger” in the RFA that allows FINI projects to use incentives for the purchase any SNAP eligible food product.

This “trigger” is not consistent with the goals of FINI to increase the purchase of fruits and vegetables by low-income consumers participating in SNAP. This trigger allows incentives to be used to purchase any SNAP eligible food and opens FINI up to criticism. Although FINI enjoys strong bi-partisan support on Capitol Hill, we do not believe it was Congress' intent that FINI incentivize the purchase of other less-healthy SNAP eligible foods. Allowing this trigger also limits the full benefit FINI incentives can have on increasing fruit and vegetable purchases.

Ideally, the only “trigger” that should be allowed in FINI projects is... “Participating SNAP households receive incentives ONLY for the purchase of FINI qualifying fruits and vegetables and incentives are redeemable ONLY for the purchase of FINI qualifying fruits and vegetables. We believe this trigger better aligns with the intent of Congress in the 2014 Farm Bill and suggest FNS strongly consider making this trigger the only allowable trigger for FINI projects.

3. Further clarify in the RFA what is a FINI eligible fruit/vegetable and make this definition consistent with the WIC approved list of fruits and vegetables.

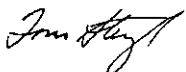
Although the RFA defines FINI fruits and vegetables as “any variety of fresh, canned, dried or frozen whole or cut fruits and vegetables without added sugars, fats/oils, and salt,” there is still confusion on what can be purchased with FINI benefits. This confusion is compounded by the triggers that allow benefits to be earned/redeemed by purchase of any SNAP eligible food item. Many Farmers Markets also blur this issue...is anything for sale at a Farmers Market eligible to earn/redeem FINI incentives? Or, is anything grown/produced locally eligible to earn/redeem FINI incentives? As the goal of FINI is to increase purchase of fruits and vegetables by low-income consumers participating in SNAP, the list of FINI eligible fruits and vegetables needs to be clear and that these rules apply in every setting. Consistency with WIC approved fruits and vegetables makes it easier for supermarkets and other retailers to know exactly what is a FINI eligible food.

4. Clarify in the RFA that FINI projects are expected to incorporate best practices in the design and implementation of their projects.

Much has been learned during the last few years of FINI about strategies and best practices to improve effectiveness/redemption rates in Farmers Markets and retail supermarkets. We commend FNS on its work to develop a FINI Retail Supermarket Best Practices document and a FINI Farmers Markets Best Practices document. Sharing best practices will help FINI projects be more effective, be better stewards of federal funds, benefit more SNAP participants and also build an evidence-base for future growth. These best practice documents should be posted on the FINI website, referred to in the RFA, used in FINI webinars/training events, used by scientific review committees and on site-visits.

I would welcome the opportunity to meet with you and your staff to discuss these recommendations for enhancing the FINI RFA to more directly serve the goal of encouraging SNAP participants to choose more fruits and vegetables. We would also value discussing our vision and your perspectives as we evaluate potential options for a “FINI 2.0” as we begin work on the 2018 Farm Bill. United Fresh looks forward to collaborating with FNS and NIFA to enhance the effectiveness of FINI as a strategy to improve nutrition for SNAP families.

Sincerely,



Tom Stenzel
President and CEO