



April 8, 2019

Scott Angle
Director
National Institute of Food and Agriculture
US Department of Agriculture
1400 Independence Avenue SW
Washington DC 20250

RE: Gus Schumacher Nutrition Incentive Program – Implementation recommendations for new provisions

Dear Director Angle,

The USDA's National Institute of Food and Agriculture (NIFA) in collaboration with the Food and Nutrition Service (FNS) has done a stellar job of implementing the Food Insecurity Nutrition Incentive Program (FINI) created by the Agricultural Act of 2014. NIFA staff manage the grant application and review process with integrity and efficiency and have fostered cooperation among the grantees. FNS staff have been thoughtful about supporting information-sharing with FNS regional offices and state agencies, and about ensuring SNAP program integrity without imposing undue reporting burdens on grantees. We anticipate USDA's great work will continue and offer the following suggestions in a spirit of collaboration and in anticipation of questions USDA staff might have. Please find a summary of our recommendations as an appendix, following a more robust narrative describing our experience and reasoning for these recommendations.

The Agriculture Improvement Act of 2018 renamed the FINI program after former USDA Under Secretary August Schumacher in recognition of his commitment to connecting low-income and vulnerable shoppers to fresh, healthy, locally-grown food at farmers markets. As the original driving force behind the concept of "produce prescriptions", he would have appreciated FINI's expansion to include funding this approach and he certainly would have seen the wisdom in investing in training, technical assistance, better reporting and evaluation systems to share knowledge and improve program delivery and results nationwide.

The 2018 farm bill maintains the SNAP produce incentive grant portion of FINI essentially unchanged with increased annual funding levels. Up to ten percent of every year's program funds may be allocated to the newly-created Produce Prescription program (PP). These programs are implemented through healthcare providers and offer "prescriptions" for healthy produce for low-income and medically vulnerable populations. They are designed to measure improvements in diet-related health conditions to assess their potential to reduce healthcare spending and Medicaid costs. Congress also authorized NIFA to enter into one or more cooperative agreements for the creation of one or several centers to provide training, technical assistance, information sharing, reporting and evaluation. These centers are intended to share information and best practices, support planning and implementation in high-need communities, coordinate collaboration and cost sharing on payment

processing systems, develop uniform metrics and standard data collection protocols, and facilitate program reporting and evaluation. The goal is to provide critical program supports, allowing grantees to dedicate a greater share of their federal funds to incentives/prescriptions and organize the sharing of knowledge so that the field can advance rapidly.

The Process

The NIFA grant application and review system works well. The fact that the RFA publication, application due dates, and funding decisions have maintained a regular schedule has allowed program managers to plan in advance for application submission. The annual Project Directors' meeting has been an invaluable opportunity to learn from USDA and each other to increase the impact of our work. This year, we are especially appreciative of the work NIFA staff are doing to bring Project Directors together in May instead of August to allow preparation for the program changes that the farm bill language has inspired. Peer review panels are an important part of the NIFA review process, and the one suggestion we would offer is to ensure that going forward the FINI panel includes individuals with expertise in the following sectors to ensure there is the necessary knowledge to assess the feasibility and merit of submitted applications:

- Grocery
- Produce supply chain
- Electronic payment processing
- Point of sale and record-keeping systems
- Farm direct retail
- State SNAP agencies
- State agriculture departments
- Social science/consumer behavior research
- Dietary science/nutrition research
- Health economics & healthcare behavior research
- Management of Federally Qualified Health Centers (FQHC)
- State Medicaid plan/waivers

Congress indicated that funding for the training, technical assistance, evaluation and information sharing center(s) be provided through cooperative agreement(s), recognizing that the standard grant RFA and evaluation metrics are not designed for these types of activities. Applications to provide these services should be compared to each other and reviewed by those who are competent to assess the relative merits of the approaches being proposed. We encourage NIFA to recognize that teams/organizations that have practical experience implementing incentive programs, credible track records providing training and technical assistance, include representatives of key public and private partner organizations, are able to serve various kinds of programs in different communities, and have experience designing and running reporting systems and evaluating incentive systems will be critical to successfully providing support to the field, annual reports and ongoing evaluation.

Produce Prescription Programs (PP)

Some FINI funding over the past four years has been used to successfully initiate, implement and expand produce prescription programs. These programs have strengthened the connection between health care

services and nutrition and demonstrate that food can be medicine. The community of PP practitioners using FINI grants have been limited by being required to screen participants for SNAP enrollment and the challenges posed by food retailers' point-of-sale (POS) systems. Establishing a distinct funding stream for these programs will facilitate evaluation and the program design establishes a connection with healthcare that is not required for SNAP incentives. PP programs range in size and scope from one clinic to a statewide network of clinics and retailers so it will be critical that PP grants seed beginning projects while also investing in larger programs that have multi-year missions.

Training, Technical Assistance, Information Sharing and Evaluation Center(s)

The farm bill authorized the creation of one or more centers to provide practical support and accountable reporting in response to feedback from grantees, the grocery and farm direct retail sector, and researchers. Incentivizing healthy produce to support better dietary health for low-income shoppers has moved from a novel idea to a recognized field with a track record and growing library of peer-reviewed literature. There are four years of FINI-funded SNAP incentive program experience but no report on the programs' results or repository with information on the grantees, their program designs, participating retailers, SNAP participants, evaluations or research done on the projects. The new training, technical assistance, evaluation and information sharing centers are intended to fill this void, as well as provide practical assistance to programs, coordinate work to overcome common barriers, facilitate communication among grantees and the public agencies whose support they need, and support collaborative research. These centers will support grantees operating both SNAP incentive and PP programs.

The centers will be responsible for providing several kinds of supports and services.

Retailer support: We believe the diversity of types of healthy food retailers serving many different kinds of communities is a crucial asset to the longterm goal of achieving increased fruit and vegetable consumption among SNAP and medically vulnerable families. The easier it is for retailers of all sizes to accept SNAP, produce incentives and PP the more food environments will be improved.

Point of sale hardware and software systems (POS) continue to pose major challenges to SNAP incentive and PP success in grocery stores and farmers markets. Grantees need a way for experts in the retail sector, electronic payment industry, public agencies and software development to cooperate on the creation of products that meet incentive and PP program needs, are affordable, dependable, and available to all participating retailers. A mechanism for discussion, problem-solving and collaboration to address the barriers faced by distinct "sub-groups" within the retail family will speed up the development of new systems that fit within the limitations of different retail sizes and types.

A variety of incentive instruments are being used now, almost always chosen for expediency based on store or market limitations. Practitioners must be able to assess the relative merits of different approaches to make better informed program design decisions. An organized group of retailers cooperating on data collection can provide crucial information on the costs and merits of different instruments. The information could be shared with all grantees and retailers, taking the guesswork out of that decision.

Store product placement, signage, outreach, merchandising, and cashier training are all critical to success but costly and time consuming for individual stores. New farmers markets and small stores in rural and urban communities often have limited capacity to develop and initiate best practices. Hands-on, intensive help from grocery and farm retail professionals can get them started successfully, establish the connections they will need with local partners, provide advice on point-of-sale systems and upgrades, and offer trouble shooting help.

Farm direct retailers [farmers markets, farmstands, community supported agriculture (CSA)] face ongoing challenges with wireless equipment and service to process SNAP transactions. Many rely on volunteers and have limited capacity to collect data. Most SNAP shoppers do not know they can use their benefits with farm retailers, and markets do not know that they can work with local and state agencies to provide information on their programs. Strong farm retail organizations and associations can provide training and peer-to-peer mentoring to raise the level of professional knowledge and capacity of the sector.

Regulation clarity: Successful SNAP incentive and PP programs rely on strong relationships between FNS, state SNAP agencies, state agriculture departments, state and local public health departments, and the nonprofit organizations and retail partners implementing incentives. There must be a common understanding of SNAP, incentive and PP program rules and a mechanism to share information quickly and accurately when rules change. SNAP shoppers must know that participating in incentive programs will not jeopardize their benefits and staff at state SNAP agencies must understand how programs operating in their states work and what they are permitted to do to promote their use.

The electronic payment processing world is evolving fast. Competition between the few processing companies is fierce, new apps providing a variety of services to SNAP shoppers abound and it is often hard to tell whether they conform to program rules. SNAP incentive programs are affected by all of these pressures but few practitioners have the degree of understanding of the systems to make informed decisions. A forum for information sharing on technical issues like these would prevent grantees from making costly technology mistakes and could provide relevant information to public agencies as they make contract decisions.

Program feasibility assessment, planning, design, and problem-solving

While there is no one perfect way to implement incentive or prescription programs, there is a body of knowledge among practitioners that should be easily available to prevent common mistakes from being repeated and to ensure that key factors have been considered in program design and roll-out. We know what kinds of partnerships can increase the likelihood of success and ways to collaborate with other federal programs to maximize the impact of each. There are now data available to help projects predict how many incentives or prescriptions will be used in diverse communities in a program's first year, as well as standard benchmarks for project growth. Staffing requirements are well understood as well as the kinds of skills necessary for different program approaches and project functions. In general, there is a need for experienced guidance for incentive and PP grantees about structuring programs that can operate and scale efficiently in ways that minimize administrative overhead, and maximize reach and efficient delivery of incentives or prescriptions.

There is a special need to provide intensive support for places where need is high, resources are tight, and local public and private institutions do not have the capacity to write competitive grant applications and implement

grants successfully. There are many places in rural America, for example, where SNAP incentive or PP programs could have a transformative effect on small grocery stores or fledgling farmers or mobile markets. While strong personal networks and deep social capital can support success once a program is launched, these communities need extra help in the planning, design and application phases to be able to compete for funding. They also need support to compensate for the lack of ancillary resources that have helped launch programs elsewhere. Centers should provide experienced technical assistance tailored to both urban and rural communities in different regions of the country.

Fundraising

Raising the 1:1 match required for SNAP incentive programs is a constant challenge, especially in under-resourced communities. However, there are fundraising strategies that have proven successful and that could be shared with the right set of partners providing the appropriate technical assistance. The centers should support fundraising efforts with a variety of potential matching funders from state and local government to large philanthropies and community and family foundations.

Reporting and evaluation

Reporting and evaluation are crucial to provide a clear picture of how taxpayer dollars are being spent and the impact they are having. Reporting must be streamlined, FINI grantees should be collecting common data, and the results should be publicly available.

The first four years of federal funding for SNAP incentive programs seeded creativity and design testing. The range of ideas brought interesting results, but this variability made one national evaluation difficult. Practitioners chafed at reporting templates that were clunky, unclear and reflected a lack of understanding of how programs work. They were frustrated that the data that they provided entered a “black box”. There was no mechanism for it to be shared, discussed, understood, and used to help improve the field.

The farm bill envisions a better approach to reporting, information sharing and evaluation. One center or collaborative should collect and collate the information from all FINI grantees and produce an annual report that provides a comprehensive description of the funded incentive and PP programs around the country and their results for the year. Practitioners, representatives of key sectors and evaluators should be part of designing the reporting system. Their knowledge should inform appropriate data to indicate program outputs and assess outcomes. They can define and describe the data being requested to ensure common understanding and help create the templates for uniform reporting. Ideally, grantees will be able to provide data online to one entity and then be provided with a document that organizes their results in a format readable by NIFA’s REEport system.

In addition to the reporting function, a center/collaboration should create and manage a publicly available, searchable website with program descriptions, evaluations, sample materials, and publications. It should create and host a space in which evaluators and researchers can share their work, discuss the emergence of best practices, and identify and coordinate future research to fill holes in our knowledge.

We know that long-term dietary improvement relies on a number of factors, so effective program evaluation requires a multidisciplinary approach that includes quantitative as well as qualitative data. All large FINI grantees have an independent evaluation. They look at the programs through different lenses and all add to the collective knowledge in the field. Most of these are conducted by professional evaluators or university researchers and many have contributed to the exploding body of peer reviewed literature on SNAP incentives and PP programs. The center/collaboration should have a mechanism to foster ongoing conversations among grantees, evaluators and researchers to ensure that the data being collected is accurate, informative and updated as the field evolves.

The requirements for an entity to perform effective reporting and evaluation functions for FINI projects nationwide are likely quite distinct from the requirements of a center that will provide appropriate training and technical assistance to FINI grantees, as described above. We encourage USDA to consider separate agreements with a center(s) for training and technical assistance and one focused primarily on evaluation and reporting national results. Encouraging (or requiring) communication and collaboration among the centers will help ensure national sharing of uniform information, genuine national reach (not just serving special populations and geographies), and the potential for hosting national communities of practice and/research consortium to move the field forward.

Recommended Qualities for Successful Centers

Active partnerships with relevant associations are very important to helping support SNAP incentive and PP program success. These include public human service, health and agriculture agencies and engaged retail, technology, and farm groups. Collaboration helps sectors work together to understand the constraints the others face, identify and address “friction points”, and design and implement programs and technical assistance most likely to be successful on the ground. We urge USDA to award partnership agreements to applicants that reflect this understanding and have these relationships in place.

A successful applicant’s design should include ongoing engagement of grantees and key stakeholders to assess, adapt, and improve the work as the field evolves. Plans should demonstrate flexibility to respond to changes and opportunities to advance the field. Studies of training and technical assistance have found that there is no substitute for hands-on training, face-to-face gatherings and peer mentoring to effectively share knowledge. We believe a successful approach will maximize impact by including in-person support and using centralized structures and systems to share information, conduct training, solicit feedback and problem-solve.

A T&TA center must have a demonstrated ability – or has partnerships that ensure that – information and services are provided in multiple ways that are appropriate for diverse circumstances and communities. There should be a system for easy sharing of information among programs and active peer-to-peer learning. Industry-specific or complex technical work (POS design, transaction tech) should be led by experts, organizations, and associations that have deep knowledge of, trust and engagement with the sectors.

Lastly, we believe that TA, reporting and evaluation should reflect a serious commitment to interdisciplinary analysis, an ability to understand and elucidate the pros and cons of various approaches, and a clear focus on assessing and sharing the impacts of various strategies and/or tools. While there is not a single “best practice”,

practitioners need to understand what the various options are and have support and information enabling them to make informed, appropriate choices for the communities and circumstances in which they operate.

Thank you for the support that NIFA and FNS have given to the successful implementation of FINI since 2014. The knowledge and excitement that the program has fostered has allowed the field to grow faster and achieve better results than we could have anticipated five years ago. There is a strong community of practitioners ready to help advance the field and we look forward to continuing to work in partnership on the endeavor.

Sincerely,

Fair Food Network
Academy of Nutrition and Dietetics
American Farmland Trust
American Heart Association
Bread for the World
Farm Credit Council
Farmers Market Coalition
Field and Fork Network
Food Policy Action – Education Fund
Good Food For All
Johns Hopkins Center for a Livable Future
National Co+op Grocers
National Farm to School Network
National Grocers Association
National Sustainable Agriculture Coalition
National Young Farmers Coalition
Rural Advancement Foundation International --
USA
The Food Trust
The Wallace Center at Winrock International
Union of Concerned Scientists
United Fresh Produce Association
Wholesome Wave

Appetite for Change and Northside Fresh
Coalition MN
CHI Health, NE
Community Crops, NE

Community Farm Alliance, KY
Experimental Station, IL
Field & Fork Network, NY
Food Security Committee of the Lincoln-
Lancaster County Food Policy Council, NE
Groundwork Center for Resilient Communities,
MI
Hawaii Appleseed Center for Law and Economic
Justice, HI
Iowa Healthiest State, IA
Just Food NY
Kiwanis Club of Lincoln, Nebraska – Fallbrook,
NE
LiveWell, CO
Maine Farmland Trust, ME
Maine Federation of Farmers Markets, ME
MountainWise, NC
Nebraska Food Council, NE
Nebraska Grocery Industry Association, NE
New Mexico Farmers Marketing Association
San Francisco Bay Area Planning and Urban
Research Association (SPUR) CA
Sustainable Molokai, HI
The Food Basket Inc., Hawai'i Island's Food
Bank, HI
Urban Harvest, TX
Vegas Roots, NV
West Virginia Food and Farm Coalition, WV

Appendix: Summary of Recommendations

The following is an overview of the recommendations included throughout the text of this document, organized into sections focused on effective process and needed structure.

Process recommendations

1. The NIFA grant application and peer review process has worked well. Peer review panels are critical and should include individuals with relevant expertise to assess the feasibility and merit of submitted applications.
 - a. Relevant grant reviewer experience includes: grocery, produce supply chain, electronic payment processing, point-of-sale and record-keeping systems, farm direct retail, State SNAP and agriculture departments, researchers, State Medicaid plan/waivers, and Federally Qualified Health Centers.
2. The requirements for a center to perform effective reporting and evaluation are distinct from the requirements of an entity to provide appropriate training and technical assistance. We encourage USDA to consider separate agreements for the training and technical assistance functions and those focused primarily on evaluation and reporting.
3. Applications for cooperative agreements for the center(s) should be compared to each other and reviewed by those who are competent to assess the merits of the approaches.
 - a. Strong cooperative agreement applications for the center(s) should reflect: practical experience implementing incentive programs, credible track records providing training and technical assistance, representatives of key public and private partner organizations, facility serving various kinds of programs in different communities, and experience designing and running reporting systems evaluating incentives.

Structure recommendations: Center for Evaluation

1. One evaluation center/collaboration should collect and collate information from all FINI grantees to produce a comprehensive annual report of the funded incentive and PP programs.
2. The reporting system design should involve input from practitioners, representatives of key sectors, researchers and evaluators, and should also include a mechanism to foster ongoing exchange among these stakeholders to ensure data collected is accurate and informative.
 - a. Ideally, grantees will be able to provide data online and receive back a summary organizing their results in a format readable by NIFA's REEport system.
3. In addition to the reporting function, the evaluation center should create and manage a publicly searchable website with program descriptions, evaluations, sample materials, and publications. This should include space for evaluators and researchers to collaborate, share best practices, and identify and coordinate future research.

Structure recommendations: Center for Training and Technical Assistance

The training and technical assistance center should respond to the need for experienced guidance to help grantees structure programs that can operate and scale efficiently to minimize administrative overhead and maximize reach and effective delivery. To this end, a successful applicant to provide training and technical assistance should be prepared to:

1. Provide experienced technical assistance tailored to both urban and rural communities in different regions of the country.
2. Support and advise on grantee's fundraising efforts with a variety of potential matching funders from state and local government to large philanthropies and community and family foundations.
3. Offer strong connections with farm retail organizations and grocery retail associations to access their insight and help in training and mentoring to increase capacity and professional knowledge. Hands-on help from grocery and farm retail professionals can help grantees connect credibly with local partners, understand point-of-sale systems and upgrades, and access general trouble-shooting help.
4. Provide a clear, common understanding of relevant SNAP, incentive and PP program rules and a mechanism to share information quickly and accurately when rules change.
5. Facilitate a forum for information-sharing of technology experiences and issues to help provide relevant information to public agencies while also preventing grantees from making costly mistakes.