

State of Iowa

State of Nebraska

November 29, 2016

The Honorable Thomas J. Vilsack
Secretary of Agriculture
U.S. Department of Agriculture
Jamie L. Whitten Building
1400 Independence Avenue, SW, Room 200-A
Washington, DC 20250

The Honorable Kevin W. Concannon
Under Secretary, Food, Nutrition & Consumer
Services -- U.S. Department of Agriculture
Jamie L. Whitten Building
1400 Independence Avenue, SW, Rm 216-E
Washington, DC 20250-0106

Dear Secretary Vilsack and Undersecretary Concannon:

Iowans and Nebraskans who utilize the Supplemental Nutrition Assistance Program (SNAP) depend on accessing a variety of retailers including small retailers such as neighborhood corner stores, drug stores, and convenience stores. We are concerned about the Food and Nutrition Service's ("FNS") proposed rule to modify retailer eligibility requirements in SNAP that could jeopardize food access for many of our citizens. In rural America, small retailers typically are the only source to purchase foods and ensuring access to food is a goal we all share.

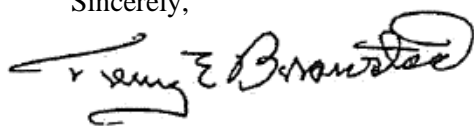
We understand that you have heard these concerns during the comment period and we are hopeful that your final rule will protect access to convenient locations to redeem SNAP benefits and improve the availability of healthier food options overall. Many Americans, including the 15 percent of rural households that are food insecure, live several miles away from grocery stores or have restricted transportation options. Fortunately, in the many rural and urban communities, small format retailers fill food access needs in SNAP.

We have shared goals of making our states healthier and we appreciate efforts to improve healthy options for SNAP participants, but the proposed rules seem to go too far. Iowans have expressed concerns that the proposed rule will lead to decreased retailer participation in SNAP as result of many concerns in the proposed rules including:

- Too narrowly defining "staple foods,"
- Excluding multiple ingredient items and foods that are "generally consumed between meals," (e.g., cheese and fruit trays) from counting towards depth of stock requirements,
- Eliminating some nutrient dense foods that are also quick and easy to prepare, and
- Automatically excluding stores from participating in SNAP if more than 15 percent of the foods they sell are cooked onsite before or after purchase even though hot foods cannot be purchased with SNAP.

Taken together the proposed rules could limit food access and would be impractical for many small town food retailers resulting in many unintended consequences for Iowans and Nebraskans to access foods. We appreciate your efforts to modify the original proposal to better balance our shared goals of access and health. The final rule should be practical for small town retailers and maintain food access.

Sincerely,



Terry E. Branstad
Governor of Iowa



Pete Ricketts
Governor of Nebraska