



UNIVERSITY OF CALIFORNIA
Agriculture and Natural Resources

Nutrition Policy Institute

23 July 2025

FNS Privacy Officer, Information Management Branch
Food and Nutrition Service, USDA
1320 Braddock PI, Alexandria, Virginia 22314

**Re: United States Department of Agriculture (USDA) System of Records Notice,
USDA/FNS-15: National Supplemental Nutrition Assistance Program (SNAP)
Information Database**

Dear FNS Privacy Officer,

Nutrition Policy Institute at University of California Agriculture and Natural Resources respectfully submits these comments in response to the System of Records Notice (SORN) for USDA/FNS-15: “National Supplemental Nutrition Assistance Program (SNAP) Information Database,” published in the Federal Register by the U.S. Department of Agriculture (USDA) on June 23, 2025.¹

Nutrition Policy Institute has, since 2014, engaged in research and evaluation of U.S. nutrition programs and policy. We have concerns regarding both the proposed new Database and the accompanying Notice.

The Supplemental Nutrition Assistance Program (SNAP) is an indispensable resource to combat hunger in our nation. Congress established SNAP to “promote the general welfare... [by] safeguard[ing] the health and well-being of the Nation’s population and raise levels of nutrition among low-income households.”² SNAP is the largest food assistance program in the country.³

¹ Privacy Act of 1974; System of Records, 90 Fed. Reg. 26,521.

² Food Stamp Act of 1964, Pub. L. No. 88-525, § 2, 78 Stat. 703, 703 (1964).

³ U.S. Dep’t of Agriculture Economic Research Service, Supplemental Nutrition Assistance Program (Jan 8, 2025), <https://www.ers.usda.gov/topics/food-nutrition-assistance/supplemental-nutrition-assistance-program->

The Notice for the proposed National SNAP Information Database (NSID) raises numerous concerns and exhibits significant omissions, particularly regarding the scope of data collection. USDA has not provided a full and exhaustive list of the data being sought. This lack of clarity on the records that will be collected creates widespread confusion for State agencies, SNAP applicants and beneficiaries, and organizations who help connect individuals to SNAP services. For example, the Georgia Department of Human Services submitted a comment on July 11, 2025—two days after the renewed demand letter—seeking clarification on what data to submit and how.⁴

Furthermore, the SORN fails to provide clear and legitimate reasons for the new wide-ranging collection of personal data. The stated primary purposes of validating eligibility and strengthening program integrity contradict existing statutes and robust systems already in place to ensure program integrity. For instance, the National Accuracy Clearinghouse (NAC), established pursuant to Congressional direction in the 2018 Farm Bill, already serves to prevent interstate dual participation in SNAP through a shared database of eligibility information. **The Notice contains no evidence that existing systems like the NAC are not functioning as intended or that there is a meaningful gap in lawful data collection that merits building a new Database.**

Beyond the issues of purpose and clarity, the SORN’s outlined “routine uses” for SNAP data are excessively broad and fundamentally conflict with the program’s foundational statute. SNAP is designed to provide food assistance. Collecting and sharing participants’ personal information with agencies unrelated to nutrition or benefits access risks undermining the core mission of the program. We are concerned that potential participants will not seek the food assistance supports to which they are entitled and that, as a result, hunger and malnutrition in our nation will increase. Evidence suggests that any resulting increases in food insecurity will lead to reductions in children’s academic achievements, increased rates of childhood obesity, increased rates of poor cardiometabolic health, and increased healthcare costs.⁵ These costs are

[snap/#:~:text=The%20Supplemental%20Nutrition%20Assistance%20Program,program%20for%20low%20Income%20Americans.](#)

⁴ *Id.*

⁵ Shankar P, Chung R, Frank DA. Association of Food Insecurity with Children's Behavioral, Emotional, and Academic Outcomes: A Systematic Review. *J Dev Behav Pediatr.* 2017;38(2):135-150.; Thomas MMC, Miller DP, Morrissey TW. Food Insecurity and Child Health. *Pediatrics.* 2019;144(4):e20190397.; St Pierre C, Ver Ploeg M, Dietz WH, Pryor S, Jakazi CS, Layman E, Noymer D, Coughtrey-Davenport T, Sacheck JM. Food Insecurity and Childhood Obesity: A Systematic Review. *Pediatrics.* 2022;150(1):e2021055571; Te Vazquez J, Feng SN, Orr CJ, Berkowitz SA. Food Insecurity and Cardiometabolic Conditions: a Review of Recent Research. *Curr Nutr Rep.* 2021;10(4):243-254; Berkowitz SA, Seligman HK, Meigs JB, Basu S. Food insecurity, healthcare utilization, and high cost: a longitudinal cohort study. *Am J Manag Care.* 2018;24(9):399-404.

likely to outweigh any savings the federal government may experience as a result of lower SNAP participation.⁶

Finally, the federal government is not allowing meaningful public comment on this critical issue. **The vital importance of SNAP and the highly sensitive data being requested warrant a more thoughtful and thorough approach than the one exhibited here.** Building a new system without clear justification wastes resources, duplicates effort, and introduces new risks—without improving outcomes for participants or administrators. This will only further burden state agency administrators, and potentially cost states great expense.

For these reasons, University of California Nutrition Policy Institute respectfully requests that the System of Records Notice for the Food and Nutrition Service (FNS): “National Supplemental Nutrition Assistance Program (SNAP) Information Database” be withdrawn, and that USDA abandon its proposal to establish a new data system and halt all data collection related to the Notice.

Sincerely,

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⁶ Berkowitz SA, Seligman HK, Rigdon J, Meigs JB, Basu S. Supplemental Nutrition Assistance Program (SNAP) Participation and Health Care Expenditures Among Low-Income Adults. *JAMA Intern Med.* 2017;177(11):1642-1649.