

[If applicable place on appropriate letterhead]

[DATE]

Re: Comment on USDA Food and Nutrition Service Updated Staple Food and Stocking Standards for Retailers in SNAP

To whom it may concern,

On behalf of [INSERT NAME OF TRIBE/ORGANIZATION IF APPLICABLE], I am submitting the following comments on the U.S. Department of Agriculture's Food and Nutrition Services (FNS) proposed Updated Staple Food and Stocking Standards for Retailers in Supplemental Nutrition Assistance (SNAP).

SNAP is an important program for Tribal citizens, who face some of the highest rates of food security in the country, and having healthy options available at SNAP retailers is critical. Adjusting the protein category to include beans, lentils, nuts, and seeds may help make these more widely available, increasing access to healthy, shelf-stable sources of plant-based protein, some of which have significance in Tribal communities.

This change, along with the efforts of the proposed regulation to make it easier to become a SNAP retailer, will better support Tribal citizens' access to healthy food. However, the regulation has a few points of concern. In order for SNAP to be a viable source of healthy food for Tribal citizens, not only must available products on retailers' shelves be healthy, but Tribal citizens must also have meaningful access to SNAP retailers, grocery stores, convenience stores, farmers markets, and the like, who have been approved by USDA to accept SNAP Electronic Benefits Transfer (EBT) cards.

Any regulatory changes that impact retailer eligibility can necessarily impact Tribal citizens' access to SNAP and to healthy food, as well as the economic viability of smaller retailers that may rely on SNAP transactions to continue operating in rural and remote areas with small customer bases.

Some of the proposed updates to staple foods restrict, not expand, Tribal citizens' access to healthy foods, and the updated stocking requirements will make it more challenging for smaller format stores in rural and remote communities to remain certified SNAP retailers. This limits food access for elderly people and families with children in Tribal communities. Sixteen percent of rural households rely on SNAP¹ at an estimated

¹ "SNAP Spending and the Rural Economy." 2021. Cfra.org. November 24, 2021. <https://www.cfra.org/blog/snap-spending-and-rural-economy>.

28,000 rural retailers.² Rural and remote stores are often smaller format stores and lack the available space to carry an expanded product line without significant financial loss. Fewer SNAP retailers in our communities means limited access to any food for our most vulnerable people, and forces elders and families with young children to travel long distances for food, if they can do so. In some places in Indian Country, it may be a four-hour just drive to reach such retailer.

If Tribal citizens lose access to SNAP, they may seek other food and nutrition assistance programs if they are eligible, such as the Food Distribution Program on Indian Reservations (FDPIR). We are concerned that loss of SNAP access due to loss of retailers will cause FDPIR to see a large influx of Tribal citizens without any additional administrative dollars or food purchases to support them.

We are aligned with USDA on the goal of expanding healthy food access for our citizens. However, we encourage USDA to consider the impact of these new stocking requirements on rural and remote communities across the country, creating exemptions for rural places so that they make continue to offer this vital source of healthy food for our communities.

[PLEASE INSERT ANY EXAMPLES OR FURTHER COMMENTS YOUR TRIBE MAY HAVE]

Respectfully,

[INSERT SIGNATURE AND TRIBAL AFFILIATION]

² This number was calculated using a cross section of rural Congressional Districts and how many SNAP retailers were in those districts. 2025. Arcgis.com. 2025. <https://esri.maps.arcgis.com/apps/instant/insets/index.html?appid=4365c6bab410440f9a44a22649d0b8b8>; "SNAP Retailers Database." 2018. Center on Budget and Policy Priorities. 2018. <https://www.cbpp.org/snap-retailers-database#Arkansas>.