



July 21, 2025

FNS Privacy Officer, Information Management Branch
Food and Nutrition Service, USDA
1320 Braddock Place
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,

On behalf of the [Big Cities Health Coalition](https://www.bchc.org/) (BCHC), I write to provide comment 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.ⁱ We have serious concerns regarding both the proposed new Database and the accompanying Notice.

BCHC is comprised of health officials leading 35 of the nation's largest metropolitan health departments, who together serve more than 61 million — or about one in five — Americans. Our members work every day to keep America's communities safe and healthy.

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."ⁱⁱ SNAP is the largest food assistance program in the country.ⁱⁱⁱ Ensuring access to necessary and appropriate nutritional benefits is a key part of protecting and promoting the public's health. Our members are also part of the critically important provision of 'wrap around' services to promote and protect the public's health, and as such, we care deeply about being able to continue these nutrition services while also safeguarding people's right to data privacy.

The Notice for the proposed National SNAP Information Database (NSID) exhibits significant errors and 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 and local 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.^{iv} If states are not clear on requirements, the trickle-down effects will be even more confusing for county and city agencies that administer SNAP benefits in communities across the country.

Furthermore, the SORN fails to provide clear and legitimate reasons for such a wide-ranging data collection. 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 sweeping and fundamentally conflict with the program's foundational statute. Routine Use 8, for example, envisions unfettered sharing of data for law enforcement, a scope significantly wider than the explicitly permitted disclosures of SNAP participant information under the authorizing legislation. The relevant statute permits data sharing on a *highly individualized, household-specific basis*.^v In stark contrast, this Notice mandates an extensive, unrestricted collection and dissemination of sensitive data, effectively transforming a vital federal benefit program into a comprehensive data repository for law enforcement.^{vi}

Similarly problematic is Routine Use 11, which grants the USDA broad discretion to release SNAP data to any domestic government entity involved in federal benefits programs, provided the USDA deems such disclosure "reasonably necessary... to prevent, deter, discover, detect, investigate, examine, prosecute, sue with respect to, defend against, correct, remedy, or otherwise combat fraud, waste, or abuse in such programs."^{vii} This provision extends considerably beyond the limited data disclosures authorized by Congress, even in the name of addressing "waste, fraud, and abuse."

Finally, the federal government is not allowing meaningful public comment on this critical issue. On July 9—halfway through the comment period—USDA sent another letter to states setting a new and rapidly approaching deadline of July 24 for the same data that had already been requested and paused once.^{viii} This date, immediately following the close of the SORN public comment period, leaves USDA no time to consider, let alone *meaningfully address*, any comments or concerns from the public, including state agencies seeking to responsibly comply without violating federal privacy laws or similar state laws. The vital importance of SNAP and the highly sensitive data being requested warrant a more thoughtful and thorough approach than the one exhibited here.

For these reasons, BCHC 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 data system, as well as halt all data collection related to the Notice. If USDA must proceed with the creation of the Database, we recommend that it provide more clarity on all the data states (and/or other local entities) will need to submit and how, create a reasonable schedule to receive the data, and work to ensure the data is protected, accurate, and adequately reviewed. Further, sharing the intended use of these data would be an important trust building step with state and local agencies, as well as those in the communities that are served by SNAP benefits.

We at BCHC appreciate the opportunity to provide input on such a critical matter to the public’s health and safety. Please do not hesitate to contact me (juliano@bigcitieshealth.org) if we can be of further assistance.

Sincerely,



Chrissie Juliano, MPP
Executive Director

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

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

ⁱⁱⁱ U.S. Department of Agriculture Economic Research Service, [Supplemental Nutrition Assistance Program](#) (Jan 8, 2025).

^{iv} *Id.*

^v 7 U.S.C. § 2020(e)(8), (15).

^{vi} *See* 90 Fed. Reg. 26,522-23.

^{vii} *Id.* at 26,523.

^{viii} SNAP Database – Letter to State Agencies (July 9, 2025), <https://www.fns.usda.gov/snap/admin/database-letter>.