

V E R M O N T

EARLY CHILDHOOD
ADVOCACY ALLIANCE

July 21, 2025

SUBMITTED VIA [REGULATIONS.GOV](https://www.regulations.gov)

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

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

Dear FNS Privacy Officer,

The Vermont Early Childhood Advocacy Alliance submits these comments in response to the System of Records Notice 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.

We have extremely strong concerns regarding both the proposed new Database and the accompanying Notice.

First, the Notice does not provide sufficient information to the public. It has errors and gaps, and has not clearly outlined the entirety of the data states are asked to submit. This lack of detail creates confusion for all parties involved with the SNAP program. In addition the timing is too short, made even worse by confusion about communications and timelines in recent weeks.

Second, the proposed database is contrary to both the purpose and spirit of the Program. Data collection (and sharing) inherently means “surveillance”, not assistance. Such actions will deter the very people who are intended to have access to assistance from participating in SNAP.

Third, it is not clear why this kind of broad data collection is necessary, warranted, or a good use of taxpayer resources. SNAP already has a strong program in place to verify eligibility and improve program integrity.

For all these reasons, we respectfully urge the USDA to withdraw the System of Records Notice for the NSID, stop the development of the database, and suspend related data collection. If USDA does move forward, we strongly recommend it clearly defines what data is being requested and how it will be submitted, sets a realistic timeline, and works closely with states to ensure that data is accurate, secure, and used appropriately.

My contact information is below should you need to be in touch about this issue.

Sincerely,



Matt Levin
Executive Director