IDFA
International
Dairy Foods Association

October 14, 2026

Shiela Corley
Acting Administrator
Food and Nutrition Administration
U.S. Department of Agriculture

Re: Supplemental Nutrition Assistance Program: State of North Dakota SNAP Demonstration Project; Docket No. FNA-2026-0307; 91 Fed. Reg. 58404 (Sept. 15, 2026)

Dear Acting Administrator Corley,

The International Dairy Foods Association (IDFA) welcomes the opportunity to provide comments on the State of North Dakota's demonstration project for the Supplemental Nutrition Assistance Program (SNAP).

IDFA represents the nation's dairy manufacturing and marketing industry, which supports more than 3 million jobs that generate $198 billion in wages and $779 billion in overall economic impact. IDFA's diverse membership ranges from multinational organizations to single-plant companies, from dairy companies and cooperatives to food retailers and suppliers, all on the cutting edge of innovation and sustainable business practices. Together, they represent most of the milk, cheese, ice cream, yogurt and cultured products, and dairy ingredients produced and marketed in the United States and sold throughout the world.

IDFA supports efforts to improve nutrition and health outcomes for SNAP participants. At the same time, IDFA has consistently supported approaches that encourage the purchase of nutrient-dense foods through incentives while avoiding broad categorical restrictions that can unintentionally limit access to nutritious dairy products. USDA's Healthy Fluid Milk Incentives (HFMI) Projects provide an important model for this approach by helping SNAP households stretch their food dollars and encouraging the purchase of milk through point-of-purchase incentives. Since its authorization in the 2018 Farm Bill, HFMI has launched 1,200 incentive projects in 33 states. Through September 2025, the program had increased qualifying milk purchases among SNAP households by 72% in participating stores.

This distinction is particularly important as states implement SNAP demonstration projects. Broad definitions of restricted producdoes can capture foods and beverages

that provide meaningful nutrition and that do not fit the underlying policy rationale for the restriction. Given the unique nutritional profile of dairy foods, IDFA is actively engaged with state lawmakers and administrators to ensure that SNAP recipients retain access to dairy products throughout the duration of these demonstration projects. IDFA urges FNA and participating states to ensure that dairy foods and beverages are not inadvertently swept into categories intended to restrict products such as soda, candy, or beverages with limited nutritional value.

North Dakota's demonstration project illustrates this concern. Under the state's proposed demonstration project, some bottled coffee products that contain added ingredients including milk could be ineligible for SNAP purchases. The state is using the metric of 5 grams of added sugar to determine bottled coffee products are ineligible for purchases by SNAP households. As a result, a beverage that is primarily milk may become ineligible solely because coffee has been added to it.

That distinction does not appropriately account for the nutritional contribution of the dairy ingredients in the product. Many commercially available bottled coffee products have whole or reduced-fat milk as a primary or secondary ingredient. For instance, Café' con Leche Espresso Iced Coffee Beverage has skim milk as its secondary ingredient[1], while La Colombe Draft Latte lists whole milk as its primary ingredient[2]. IDFA is concerned that categorically excluding these dairy-forward products may inadvertently suggest that their dairy content and nutritional contribution are not relevant to determining SNAP eligibility.

This treatment is also inconsistent with the broader approach North Dakota has taken toward dairy beverages. The state's implementation guidance appropriately preserves SNAP eligibility for flavored milk and other dairy-based drinks. IDFA believes the same principle should apply when milk remains a primary or secondary component of a beverage that also contains coffee.

Milk provides 13 essential nutrients that are key components of a healthy diet, and adding milk to coffee beverages increases the overall health benefits of these products. Restricting their purchases sends consumers the wrong message.

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[1] https://www.cafebustelo.com/coffee/ready-to-drink-iced-coffee/cafe-con-leche
[2] https://www.lacolombe.com/products/draft-latte?variant=29614528102513

IDFA requests that FNA, in the implementation of the State of North Dakota's demonstration project, ensure that all dairy beverages, including bottled coffee products in which milk or a milk product is a primary or secondary ingredient, remain eligible for SNAP purchases. More broadly, we encourage FNA to ensure that state implementation systems and product-level eligibility determinations do not inadvertently restrict dairy foods and beverages simply because they fall within overly broad product categories.

As FNA evaluates North Dakota's demonstration project, IDFA also encourages the agency to assess whether the restrictions result in unintended classifications of nutrient-dense foods, create confusion for SNAP participants or retailers, or reduce access to dairy products. These considerations will be important to determining whether the project advances SNAP's nutrition objectives without unnecessarily limiting access to nutritious foods.

IDFA appreciates USDA's continued work to improve nutrition outcomes for SNAP households and its ongoing investment in incentive-based approaches such as HFMI. We look forward to working with FNA to ensure that dairy foods remain accessible and affordable to SNAP participants while advancing our shared goal of improving nutrition and health.

Thank you for your consideration.

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