

Evaluating SNAP Food Restriction Waivers: Early Implementation Lessons and Evaluation Framework

Early Lessons from States Leading the Way

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The Opportunity

Supplemental Nutrition Assistance Program (SNAP) Food Restriction Waivers offer an unprecedented opportunity to generate actionable evidence on one of the most debated issues in nutrition policy. Shared learning and aligned evaluation can help states strengthen implementation while building knowledge that extends far beyond any single waiver to improve population health by reducing preventable chronic disease.

Beginning in 2025, the United States Department of Agriculture (USDA) approved a series of state waivers authorizing restrictions on less healthy beverages and foods purchased with SNAP benefits. These waivers represent one of the most significant state-led changes to SNAP policy in decades and, for the first time, create the opportunity to study food restrictions at scale in real-world conditions. While implementation approaches differ, all approved waivers require comprehensive evaluation, creating the conditions needed to address longstanding evidence gaps in SNAP nutrition research.

Much of the evidence to date relevant to food restrictions comes from randomized controlled trials, simulations, inferences from incentive pilots, or studies limited by geography, sample, or implementation setting.^{1,2,3,4} Although this research suggests that behavioral nudges can influence purchasing patterns and associated health outcomes, important questions remain about how purchasing restrictions operate in practice. The current wave of statewide SNAP waivers offers a rare chance to generate a much larger evidence base about implementation mechanics, retailer impacts, participant behavior and diet quality, food security, stigma, and health outcomes.^{5,6,7}

This paper synthesizes early implementation lessons and proposes a practical framework for evaluating SNAP Food Restriction Waivers. Both are informed by Public Consulting Group's (PCG) experiences helping three states with planning efforts, implementation, and evaluation, as well as by conversations with fourteen states and broader SNAP nutrition research. The framework emphasizes feasible measures that states can use to understand how waiver implementation affects participant and retailer implementation experiences, purchasing patterns, and health-related outcomes, while generating evidence that can be compared across states.

In particular, this paper will help SNAP leaders gain practical lessons from states at the forefront of adopting, implementing, or planning food restriction waivers; a cross-state perspective for anticipating risks before launch; and an evaluation design that can satisfy federal requirements without overwhelming agency capacity.

Early Implementation Lessons

The success of SNAP Food Restriction Waivers will depend on both policy design and on how effectively states navigate implementation. Early lessons are critical because decisions about retailer readiness, communications (both participant and retailer), systems changes, and data collection can be difficult and costly to reverse once implementation begins. Insights emerging from states who have navigated these

changes can help other states and agencies avoid common pitfalls, identify promising practices, and build a stronger foundation for implementation, evaluation, and impact.

- **Confirm Agency Capacity.** Evaluate the staffing, technical expertise, vendor support, data analytics, and administrative resources needed to implement and monitor the waiver while maintaining SNAP operations. Retailer support, participant communications, and evaluation activities may require more capacity than expected.
- **Map Data Access Early.** Inventory operational data fields from statewide databases and point-of-sale sources before implementation and identify whether control data of non-SNAP populations are available. Map which data can be accessed quickly to troubleshoot denied purchases, retailer issues, and system or program performance prior, during, and after launch.
- **Pressure-Test Product Definitions.** Workshop restricted product definitions with nutrition experts, Electronic Benefit Transfer (EBT) processors, and retailers. Early testing can reveal classification challenges, edge cases, and loopholes that may undermine policy intent.
- **Engage Retailers and Point of Sale Vendors Early.** Begin readiness discussions at least six months before launch to set timelines, identify point-of-sale constraints, anticipate transaction risks, project costs, and assess training needs, especially among small, rural, and independent retailers.
- **Provide Concrete Product Guidance.** Consider creating or purchasing an evolving Universal Product Codes (UPC) database with clear category rules for ineligible items. Retailers need ongoing support to align point-of-sale systems as products, formulations, and inventories change.
- **Communicate Early and Repeatedly.** Develop tailored communication strategies for participants, retailers, advocates, call centers, and eligibility staff at least six months in advance of the policy start date so each audience understands what changes are planned, when restrictions will begin, how checkout will work, and where to ask questions or raise disputes.
- **Anticipate Unintended Consequences.** Define launch monitoring parameters to flag checkout confusion and stigma, redemption problems, retailer participation concerns and disenrollments, product substitution, and access barriers. Early tracking through data, call centers, or an advisory group can help states respond before issues spread.
- **Build and Scale a Supportive Healthy Eating Ecosystem First or Alongside Restrictions.** Research suggests that restrictions may support healthier purchasing when paired with strategies that make healthier substitutions affordable, accessible, and appealing, such as incentives, adequate benefits, and healthier retail environments.^{3,8,9,10,11} Use evaluation results to inform approaches for pairing restrictions with incentives, education, and retail partnerships so participants can substitute purchases without worsening food insecurity or burden.

Evaluation Framework

PCG has developed a comprehensive mixed methods evaluation framework for assessing nutrition intervention policies, including SNAP Food Restriction Waivers, that can be adapted to each state's policy changes, implementation landscape, and available resources. It is designed to support both individual state evaluation and cross-state comparison by aligning evidence sources, core measures, and analytic methods across process, outcome, and impact domains. The framework helps states examine program operations, participant experiences, purchasing patterns, and health-related indicators. It is structured to complement state agencies' internal capacity for administrative evaluation, focusing on behavioral changes and health impacts.

Table 1. Nutrition Policy Intervention Evaluation Framework

Evaluation Outlook	Evidence Source	Core Measures	Quantitative	Qualitative
Process	Anonymous SNAP participant survey (Healthy Food, Healthy Life Survey™ *)	Awareness, purchasing, and shopping patterns	●	●
	Transaction level data for de-identified SNAP and non-SNAP shoppers	Food-category spending and shopping patterns	●	
	De-identified SNAP case data	Demographics, geography, and household size	●	
	De-identified state EBT purchase data	Shopping patterns, benefit adequacy	●	
	Community, expert, and retailer partner advisory board	Implementation operations, feedback, and support needs		●
Outcome	Anonymous SNAP participant survey (Healthy Food Healthy Life Survey™)	Shopping patterns, consumption, unintended consequences, health conditions, and well being	●	●
	SNAP participant 24-hour dietary recall (interview or survey method)	Detailed food and beverage consumption	●	●
	Community, expert, and retailer partner advisory board	Emerging unintended consequences		●
Impact	De-identified and aggregated Medicaid claims and/or encounter data for SNAP and non-SNAP patients	Overweight, obesity, and co-occurring chronic diseases	●	

Evaluation Considerations

Below are key considerations for designing actionable waiver evaluations that balance methodological rigor with implementation realities, including when to begin planning, what participant and administrative data to collect, how to assess intended and unintended effects, and why results should be tracked across groups and over time.

- **Plan Evaluation Before Launch.** Treat evaluation as a critical pre-implementation activity. Before restrictions take effect, define a theory of change, logic model, evaluation questions, baseline measures, comparison strategy, data sources, reporting cadence, and decision points. Align process, outcome, impact, and cost measures so results are credible and actionable.

*PCG's Healthy Food, Healthy Life Survey™ meets FNA requests for evaluation measures outlined in state approval letters as well as assesses changes in purchasing, consumption, health conditions, and validated quality of life measures. To date, it has been taken by more than 16K SNAP participants across two states and growing.

- **Collect Pre-Implementation Participant Data.** Survey SNAP participants before launch to establish baseline measures of policy awareness, shopping and eating behaviors, stigma, autonomy, access barriers, health, and food security. For direct participant data collection, verify SNAP participation and gather needed information.
- **Compare Results of Restrictions-Only Shoppers with Shoppers Who Also Use an Incentive Program.** Emerging evidence suggests restrictions are more likely to support healthier purchasing when paired with incentives and other supports, but findings remain mixed and require rigorous evaluation.¹² Evaluate SNAP restrictions within the broader nutrition policy ecosystem, including whether combining restrictions with incentives produces better health outcomes and impacts. Use results to consider whether adding or expanding incentives could strengthen outcomes and reduce unintended effects.
- **Track Food Security and Benefit Adequacy.** Examine whether restrictions are associated with changes in food security, benefit stretch, and households' ability to meet dietary needs. Measures can capture elements such as earlier benefit depletion or greater reliance on emergency food, among others.
- **Disaggregate Access Impacts Across Groups.** Compare results by geography, retailer access, household composition, transportation barriers, language access, and other factors that may shape participant experience.
- **Continue to Evaluate Over Time.** Health impact measures, such as lower prevalence of overweight and obesity and associated chronic conditions, as well as associated healthcare savings, may take longer than the demonstration period to manifest.

Conclusion

PCG's implementation support and evaluation services help states move quickly from compliance requirements to practical, decision-ready evidence. Our cross-state experience allows states to benchmark implementation approaches, anticipate common challenges, and generate findings that are useful to both state leaders and national policy audiences.

As states move from waiver approval to implementation, the quality of cross-state learning and evaluation will determine the value of evidence generated through the SNAP Food Restriction Waivers. Aligning evaluation approaches and routinely sharing implementation lessons can help states satisfy federal requirements while producing findings that are both credible and comparable across jurisdictions. By integrating process, outcome, and impact measures, states can assess whether waiver goals are advancing and how implementation conditions, participant experiences, retailer operations, and program context shape results. Taking this approach strengthens individual state demonstrations while building a more robust and transferable evidence base to inform future SNAP policy, food systems research, and implementation decisions nationwide.

About PCG

Public Consulting Group LLC (PCG) is a leading public sector solutions implementation and operations improvement firm that partners with health, education, and human services agencies to improve lives. Founded in 1986, PCG employs approximately 2,000 professionals throughout the U.S.-all committed to delivering solutions that change lives for the better. The firm is a member of a family of companies with experience in all 50 states, in Canada, and in Europe. PCG offers clients a multidisciplinary approach to meet challenges, pursue opportunities, and serve constituents across the public sector. To learn more, visit <https://publicconsultinggroup.com/>.

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Samantha J. Bone is a nationally recognized leader in food and nutrition policy, evaluation, and systems transformation with more than 17 years of experience across the public, private, and nonprofit sectors. She leads complex, multi-state portfolios and helps government agencies design, evaluate, and scale evidence-driven SNAP and human services programs. Her expertise includes strategic growth, policy and financial analysis, mixed-methods research, implementation science, and systems transformation. Before joining PCG in 2019, she held legislative and food-access leadership roles; she earned an MSc from the Friedman School of Nutrition Science and Policy at Tufts University and a BA from Columbia University.

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Maya Gershtenson has more than five years of experience supporting state- and federally funded public health and human services programs through evaluation, research, and project management. At PCG, she analyzes administrative, case-management, and survey data to describe populations, assess implementation fidelity, and evaluate child and family welfare outcomes. Her technical expertise includes R, Stata, SQL, and Excel, and her project portfolio spans TANF, FFPSA, tobacco prevention, Medicaid administrative claiming, and SNAP waiver evaluations. Maya holds an MSc in Epidemiology from the London School of Hygiene and Tropical Medicine and a BS in Biology from the University of Kentucky.

Endnotes

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