

July 24, 2025

Submitted via [Regulations.gov](https://www.regulations.gov)

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RE: Comment on Proposed Supplemental Nutrition Assistance Program (SNAP)—Waiver Requests To Offer Incentives to SNAP Recipients at SNAP Authorized Stores OMB No. 0584–0695

Dear Retailer Policy Division,

On behalf of the Center for Law and Social Policy (CLASP), we appreciate the opportunity to provide comments regarding USDA's proposed changes to Supplemental Nutrition Assistance Program (SNAP) incentive waiver authority.

CLASP is a national, nonpartisan, anti-poverty organization advancing policy solutions that improve the lives of people with low incomes. We work at the federal, state, and local levels to strengthen public systems, reduce barriers to economic security, and ensure that policies are informed by the experiences of directly impacted communities. For decades, CLASP has supported policies that strengthen SNAP's ability to reduce hunger, improve health outcomes, and support family stability. We believe food is a human right, and that people deserve access to nutritious, culturally relevant food in ways that are dignified, flexible, and responsive to community needs.

We strongly support USDA's proposed expansion of retailer access to SNAP incentive waivers. Programs such as the Gus Schumacher Nutrition Incentive Program (GusNIP)¹ have demonstrated that when families have greater access to affordable fruits and vegetables, they purchase and consume healthier foods at higher rates. Importantly, these programs work not because they are punitive or prescriptive, but because they increase access, affordability, and choice.

In this context, USDA should prioritize approaches that strengthen food access without increasing stigma, administrative burden, or punitive oversight. Expanding retailer flexibility through incentive waivers represents an important opportunity to support healthier outcomes through trust-based, community-centered strategies. Our comments below outline why these changes are important and offer recommendations to help ensure implementation is accessible, practical, and responsive to the realities facing SNAP participants, retailers, and community organizations today.

Context

In a randomized design in Hampden County, Massachusetts, the USDA randomly assigned 7,500 SNAP households to receive a 30-cent incentive for every SNAP dollar spent on targeted fruits and vegetables.² The final USDA evaluation found that participants consumed almost a quarter cup more

targeted fruits and vegetables per day, a 26 percent³ increase over nonparticipants, and spent 11 percent more SNAP dollars on targeted fruits and vegetables in participating supermarkets and superstores. USDA also found higher total fruit-and-vegetable spending, greater home availability, and improved diet quality scores. The National Institute of Food and Agriculture's GusNIP page is important because it explicitly says GusNIP was built on healthy incentive pilots and exists to increase the purchase of fruits and vegetables through nutrition incentives and produce prescriptions. These findings reinforce what communities and advocates have long known: when SNAP participants have greater access to affordable fruits and vegetables through flexible, incentive-based approaches like GusNIP, they purchase and consume healthier foods at higher rates—without restrictive policies that police or limit choice.

At a time when millions of people are losing SNAP benefits due to recent federal policy changes, expanding community-based nutrition supports is increasingly important. From July 2025 to April 2026, more than 4.5 million people have lost SNAP assistance nationwide.⁴ These participation declines do not reflect a reduction in hunger or need. Rather, they reflect increasing barriers to access and policy decisions that are pushing eligible people out of the program.

The importance of flexibility and incentives to increase access

Research and community experience consistently demonstrate that affordability and access are among the strongest drivers of healthy food purchasing. Incentive-based models such as GusNIP and Double Up Food Bucks have shown promising outcomes in increasing fruit and vegetable purchases among SNAP participants by reducing cost barriers and expanding purchasing power. These approaches acknowledge that many families already want to purchase healthier foods, but are often constrained by high food costs, transportation barriers, limited grocery infrastructure, and broader structural inequities that shape food access across communities.⁵

CLASP supports approaches that encourage healthier purchases through flexibility and investment rather than punitive or restrictive policies. Incentive-based strategies preserve participant autonomy while supporting improved nutrition outcomes without increasing stigma, surveillance, or administrative complexity for families. This distinction is important, particularly at a time when many policy conversations surrounding SNAP have focused on restrictive proposals that fail to address the underlying barriers to healthy eating.

CLASP also recognizes the importance of expanding incentive access beyond farmers markets alone. While farmers market incentive programs have provided meaningful benefits for many SNAP participants, they can also present practical access barriers that limit participation for some families. Farmers markets are often only available once per week or month, may operate during limited or inconsistent hours, and are not always accessible to individuals working nontraditional schedules, managing multiple jobs, relying on public transportation, or balancing caregiving responsibilities. In some communities, farmers markets may also be located far from where families live. We encourage USDA to ensure that expanded waiver opportunities are accessible to a broad range of retailers, including smaller community-based retailers, cooperatives, independent grocers, and local food systems that are often more embedded within and responsive to the needs of the communities they serve. In many rural communities, Tribal communities, immigrant communities, and neighborhoods experiencing food apartheid, smaller retailers and community-based food networks play a critical role in food access and may be more accessible and trusted than larger retail chains.

Expanding retailer waiver opportunities to include grocery stores, smaller neighborhood retailers, and

other community-based food access points can help ensure that healthy food incentives are available in locations with broader operating hours, greater consistency, and more frequent access. Increasing flexibility in where and how incentives are offered allows more families to realistically utilize these programs within the realities of their daily lives.

As USDA considers implementation of these changes, CLASP encourages the agency to prioritize approaches that are people-centered, practical, and responsive to varying retailer capacities and community needs. This includes minimizing unnecessary administrative burden for smaller retailers and community partners, incorporating participant and community feedback into implementation efforts, supporting a broad range of culturally relevant foods within incentive models, and ensuring that retailers operating in underserved communities are able to meaningfully participate.

At a time when millions of families continue to face rising food costs and increasing barriers to public benefits, expanding evidence-based nutrition incentive strategies represents an important opportunity to strengthen food access while preserving participant dignity and choice. Healthy eating outcomes are best supported through affordability, accessibility, and trust-based approaches that allow families the flexibility to make decisions that work best for their households and communities.

Thank you for the opportunity to comment on this important proposal. Contact Parker Gilkesson Davis (pgilkesson@clasp.org) and Teon Hayes (thayes@clasp.org) with any questions.

¹ U.S. Department of Agriculture, National Institute of Food and Agriculture, *Gus Schumacher Nutrition Incentive Program (GusNIP)*, <https://www.nifa.usda.gov/grants/programs/gus-schumacher-nutrition-incentive-program-gusnip>.

² U.S. Department of Agriculture, Food and Nutrition Service, *Healthy Incentives Pilot (HIP)*, <https://www.fns.usda.gov/research/snap/hip>.

³ U.S. Department of Agriculture, Food and Nutrition Service, *Healthy Incentives Pilot (HIP): Final Summary*, <https://www.fns.usda.gov/sites/default/files/ops/HIP-Final-Summary.pdf>.

⁴ Center on Budget and Policy Priorities, *SNAP Tracker: People Are Losing Food Assistance as the Republican Megabill Takes Effect*, <https://www.cbpp.org/research/food-assistance/snap-tracker-people-are-losing-food-assistance-as-the-republican-megabill>.

⁵ Center for Law and Social Policy, *A Community-Driven Anti-Racist Vision for SNAP*, 2022, https://www.clasp.org/wp-content/uploads/2022/09/2022.9.28_A-Community-Driven-Anti-Racist-Vision-for-SNAP.pdf.