

SNAP Healthy Food Choice Demonstration Waiver Request Template



United States Department of Agriculture Food and Nutrition Service

SNAP HEALTHY FOOD CHOICE STATE DEMONSTRATION REQUEST

Section 17(b) of the Food and Nutrition Act of 2008, as amended (the Act), allows FNS to waive statutory requirements of the Act to conduct pilot projects designed to test program changes to increase the efficiency of the Supplemental Nutrition Assistance Program (SNAP) and improve the delivery of SNAP benefits to eligible households. The Act limits the provisions that may be waived. Projects may be approved for a period of 5 years and the Act requires that each project must include an evaluation component that demonstrates the effects of the project.

This template intends to guide and assist States in submitting a SNAP Healthy Food Choice Demonstration Project Request. States should follow the guided prompts and questions and offer any additional detail, if applicable, under each section to ensure a complete understanding of the State's proposed project.

States should review the impermissible projects prohibited by Section 17 (b)(1)(B)(iv) of the Act and additional restrictions on demonstration projects in the appendix below before requesting a SNAP Healthy Food Choice demonstration project. Additionally, to facilitate the demonstration review process, FNS strongly suggests States inform their Regional Office to discuss the project and provide any necessary technical assistance prior to submission of a request. The FNS National Office SNAP Healthy Choice team is also open to join Regional or State Agency calls to provide technical assistance.

SNAP Healthy Food Choice demonstration projects are intended to test innovative ideas that develop and implement modernized programmatic systems, infuse SNAP with new programmatic energy and vision, and strengthen State strategies to encourage healthy choices, healthy outcomes, and healthy families. FNS looks forward to working with States on potential changes to program operations that align with the Secretary's vision for nutrition assistance programs.

FNS reserves the right to withdraw its waiver approval and terminate demonstration projects at any time if FNS determines that the project is inconsistent with SNAP goals to increase the efficiency of the program and to improve the delivery of SNAP benefits to raise levels of nutrition among low-income individuals. If the State is unable to provide the data required as part of the terms and conditions of waiver approval or if FNS determines that the project is associated with significant increases in payment errors or access concerns, **FNS may suspend or terminate the project at any time.**

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Type of Request: SNAP HEALTHY FOOD CHOICE

Date of Request: 5/16/2025

State: ID

Region: WRO

Statutory Citations:

Provide the statutory citations from the [Act](#) the State seeks to waive. FNS will work with the State to identify any additional statutory waivers needed for the proposed demonstration project.

7 USC Ch. 51 §2012 (k)

Regulatory Citations:

Provide the regulatory citations from [7 CFR](#) the State seeks to waive. FNS will work with the State to identify any additional regulatory waivers needed for the proposed demonstration project.

7 CFR 271.2

Summary of Healthy Food Choice Demonstration Project Request:

Explain in a few words the goal of the project and its intended outcomes. (250 words)

Pursuant to 7 U.S.C. § 2012(k), recipients of the Supplemental Nutrition Assistance Program (SNAP) are authorized to purchase any food or food product for home consumption, as well as seeds and plants intended for food production. Certain eligible populations may also utilize SNAP benefits to procure prepared meals from designated facilities, including senior centers, domestic violence shelters, substance misuse treatment centers, and homeless shelters. Federal regulations prohibit the use of SNAP benefits to acquire alcoholic beverages, tobacco products, and hot foods or hot food products prepared for immediate consumption, except as permitted under specific provisions.

The State of Idaho proposes an alternative procedure to impose additional purchase restrictions on certain food items within the SNAP program. Specifically, Idaho seeks to prohibit the use of SNAP benefits to purchase candy and soda, as defined in state statute. These restrictions would supplement existing federal limitations established under the Code of Federal Regulations (CFR).

The proposed modification is intended to align SNAP benefit usage with public health objectives, promoting nutritional well-being and reducing the consumption of high-sugar foods and beverages that contribute to diet-related health concerns. By restricting the purchase of candy and soda, the State of Idaho seeks to enhance the program's effectiveness in supporting food security while encouraging the consumption of healthier alternatives. This policy proposal is informed by state-level legislative determinations on dietary standards and public health priorities.

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Proposed Alternative Procedures to Operate Project:

Provide a detailed explanation of the proposed Healthy Food Choice demonstration project, and how the State intends to operate the food choice project that differs from how SNAP currently operates.

SNAP-Eligible Food and Food Products Amended by the Healthy Food Choice Demonstration Waiver

- *Describe the food(s) of interest that will be restricted under this demonstration waiver. What are the desired outcomes of limiting these food(s)?*
- *If applicable, describe incentivization projects to entice SNAP-eligible households to increase purchasing of fruits and/or vegetables.*

Idaho currently operates its SNAP program following allowable food purchases in statute at 7 USC Ch. 51 §2012 (k) and definitions at 7 CFR 271.2, without any current waivers. Under the proposed demonstration project, Idaho is seeking to limit the purchase of candy and beverages following the definitions passed by its state legislature. Restrictions for candy and soda are defined as follows:

- **Candy:** defined as preparations of sugar, honey, or other sweeteners in combination with chocolate, fruits, nuts, or other ingredients in the form of bars, drops, or pieces.
 - It does not include those items containing flour or requiring refrigeration.
- **Soda:** defined as nonalcoholic beverages containing sweeteners, excluding drinks with milk or milk substitutes, beverages with more than 50% juice, and products that require preparation before consumption.

This initiative would expand restrictions at the state level beyond the existing federal unallowable purchases outlined in the Code of Federal Regulations (CFR), and leverage retailer systems to ensure compliance through UPC-based filtering. The goal of this demonstration project is to encourage healthier purchasing patterns among SNAP recipients with consistency among retailers utilizing existing point-of-sale systems.

SNAP-Eligible Household Considerations:

Please complete the next section with possible impacts and considerations to SNAP-eligible households.

Participating households and individuals

- *Describe the target population included in this waiver.*
 - *Will the State limit the project to households that meet certain requirements? For example, targeting households of a certain size, households with individuals participating in SNAP-Ed, households with individuals participating in WIC, households receiving medical assistance, or households with pregnant women and/or young children?*
- *Describe the pilot approach for households.*
 - *Will all households be participating at once?*

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- *Will there be a phased in approach based on certain household factors?*
 - *If yes, describe the household types and phase in approach below.*

The proposed initiative will be implemented on a statewide basis and will apply to all Supplemental Nutrition Assistance Program (SNAP) recipients purchasing food within the State of Idaho no later than January 1, 2027. To ensure uniform application of the restrictions and maintain clarity for program participants, implementation will be conducted across all SNAP-approved retail locations within a defined timeframe. This strategic rollout will provide consistency in enforcement, minimize customer confusion, and facilitate a seamless transition for both recipients and retailers. The State of Idaho will collaborate with authorized retailers and stakeholders to integrate the restrictions effectively while maintaining compliance with existing program regulations.

Additionally, as part of its implementation strategy, Idaho may explore a small-scale pilot program targeting a limited group of Supplemental Nutrition Assistance Program (SNAP) households before expanding restrictions to all recipients. This phased approach would allow the state to assess the demonstration's impact on customers. Key areas of evaluation may include customer complaints, shifts in redemption patterns (such as purchasing items in neighboring states), and the effectiveness of messaging directed at SNAP recipients.

Feedback obtained from this pilot initiative will be utilized to make necessary adjustments before full implementation begins. The broader rollout of restrictions for all SNAP households will begin six months after the pilot's initiation, during which Idaho will maintain collaboration with retailers and customers to facilitate a seamless transition. A structured six-month phase-in period across the state will be undertaken to maximize the demonstration's effectiveness and ensure its success.

SNAP-Authorized Retailers Considerations:

Please complete the next section with possible impacts and considerations to SNAP-authorized retailers.

SNAP-Authorized Retailers Participating in the Healthy Food Choice Demonstration Waiver

- *List the retailers participating in this pilot. Include brick-and-mortar stores, participating retailers' online platforms (e.g., Amazon.com, Walmart.com), and specialty retailer types (e.g., farmers' markets, direct marketing farmers, etc.). Write "all" if all retailers in the state will be subject to the pilot.*
- *Explain how the participating retailers were selected.*
- *Will retailer participation in the pilot be phased in? If yes, what does that plan look like?*

Idaho intends for all authorized SNAP retailers across the state to participate in the implementation of this initiative no later than January 1, 2027. This will include retail chains, large- and medium-sized retailers, convenience stores, wholesale suppliers and smaller locally owned businesses.

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The rollout of the demonstration will follow an iterative approach to ensure effective implementation. Based on initial insights from Idaho's retailer associations, the state will consider launching a pilot project involving up to four retailers of varying sizes within one selected geographic location. These selected retailers must be capable of updating their point-of-sale systems to enforce restrictions on the purchase of candy and soda or accept EBT cards programmed to restrict identified products meeting the state's definition of candy and soda. Idaho will collaborate closely with these retailers to identify and address potential challenges, including technical system issues, increased customer confusion at checkout, effectiveness of signage, consistency of restrictions across retailers, and variations in purchasing behaviors.

Lessons learned from the pilot will inform the refinement of statewide implementation strategies. For instance, consideration may be given to establishing a centralized repository for retailers to share information regarding restricted UPC codes, the influence of product placement on consumer purchasing decisions, and the effectiveness of store signage in ensuring compliance.

Feedback obtained from this pilot initiative will be utilized to make necessary adjustments before full implementation begins. The broader rollout of restrictions will begin six months after the pilot's initiation, during which Idaho will maintain collaboration with retailers and customers to facilitate a seamless transition. A structured six-month phase-in period across the state will be undertaken to maximize the demonstration's effectiveness and ensure its success.

Based on input from retailers, wholesale suppliers and retail associations, the goal is to achieve statewide consistency by having all retailers begin implementation within an established timeframe. Retail communications will be developed based on retailer input and made available through the Department's website. This centralized approach will include standardized messaging, signage templates, and access to other information to support clear, uniform communication.

Prior to developing a retailer implementation plan, Idaho plans to initiate early and sustained engagement with retailers of all sizes to gather input, identify potential barriers, and ensure the implementation process is collaborative and practical. Idaho already is communicating with the state's retailer associations to begin identifying key stakeholders that need to be at the table. We are looking at establishing an ad hoc Retail Stakeholder Group that represents the full range of retail environments, including large chains, medium-sized stores, small businesses, convenience stores, and small mom and pop retailers. This group will help inform the project throughout the planning and implementation phases. This group will provide critical information to help us identify retailer challenges and solutions for implementation, develop effective messaging for use with customers and store employees at point-of-sale, communicate any project rollout challenges and develop frequently asked questions and talking points for retail staff and key stakeholders.

This structured engagement model mirrors successful strategies Idaho has used in the past, including the implementation of staggered SNAP issuance and throughout the COVID-19 public health emergency, where transparent and consistent communication played a key role in effectively managing large-scale change.

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The Department also will work with this group to identify strategies to assist retailers in developing consistent product restrictions and update programming to restrict purchases using UPC product codes.

Consideration of retailer size

- *Provide the State's plan to adjust implementation time based on retailer size and system capabilities, if applicable.*

Utilizing the ad hoc committee, Idaho will work with retailers of all sizes to develop strategies that best fit retailers. Knowing a one-size model doesn't fit the different types of retailers, the Department will collaborate with other states to identify approaches being used in other parts of the region and country that can be adapted for use in Idaho.

Retailer-Level System Changes

Describe any retailer-level system changes and/or updates the retailer(s) will incur in the operation of this demonstration project, for example:

- *Describe how the retailer systems will be able to support all alternative procedures required of the project, or will it require an upgrade or enhancements?*
- *Describe any exemptions for retailers that are unable to make the necessary system changes.*

Idaho is still in the discovery phase of determining retailer-level impacts and system changes. We will work closely with the retail community. Idaho will provide information designed to help guide retailers in the development and implementation of a system that restricts the purchase of certain candy and soda products that meets the state's definition. Our goal is for all state retailers to implement consistent application of restrictions across the state, while allowing flexibility in how retailers integrate the solution into its point-of-sale systems.

Idaho will provide initial and ongoing information by providing clear definitions of what is allowed and not allowed, empowering retailers to flag and escalate discrepancies when identified. For example, when an unapproved item is processed, or a restricted item appears to be mistakenly excluded. This level of collaboration will ensure retailers are active partners in both the implementation and ongoing refinement of the project. The cost and technical requirements for uploading and integrating these exclusions into retail systems will be borne by the retailers. Working with the ad hoc committee, Idaho will serve as the liaison to help identify opportunities to leverage existing technology used across the country to identify cost effective approaches to implementing new food restrictions. Based on input from the retailer community, exemptions for retailers may be granted based on criteria yet to be defined by the state. This flexible and cooperative approach is designed to ensure statewide consistency while recognizing the diverse operational realities of Idaho's retail landscape. It also reinforces Idaho's commitment to working hand-in-hand with our retail partners to promote healthier purchasing behaviors with SNAP benefits.

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Impacts to the State Agency:

Please complete the next section with possible impacts to the State agency.

State-Level System Changes

Describe any State-level system changes and/or updates the State will incur in the operation of this demonstration project, for example:

- If applicable, describe how the State system will be able to support all alternative procedures required of the project, or will it require any upgrade or enhancements?*
- If your state operates Summer EBT, will it also be subject to these restrictions or will EBT system changes be required to ensure no impact to that program?*

Idaho does not anticipate any state-level system changes as part of this demonstration. The proposed item exclusions are designed to be implemented solely through retailer systems at the point-of-sale. As such, the changes would be operationalized on the retailer side of the EBT transaction process, using UPC-based restrictions, and would not require modifications to Idaho's state eligibility or benefit issuance systems.

Healthy Food Purchases Compliance Plans

- Describe the State's plans for enforcing compliance with the pilot among SNAP-authorized retailers in the targeted geographical location (e.g., county-wide, regional, statewide).*
 - How will the State work with retailers to ensure compliance?*
 - Once implemented, how will the State confirm restrictions have been implemented at the retailer level?*
 - How will retailers be held responsible if their equipment is not updated and clients are able to make ineligible purchases?*
 - How will retailers authorized after project launch be notified of the pilot parameters?*

Idaho, similar to other states requesting healthy food choice waivers, does not have regulatory authority to approve, sanction or monitor retailers for compliance with federal program regulations. Before developing its compliance plan, Idaho will seek input from retailers to identify the challenges and barriers in identifying restricted products meeting the state's definitions of candy and soda.

We have been networking with other states and have identified potential compliance strategies such as using secret shoppers to observe in-store compliance discreetly, developing a monitoring program to review a percentage of participating retailers annually and developing a self-certifying program for retailers as potential options for identifying best strategies retailers are using to implement the project.

Idaho is committed to effective implementation and stakeholder collaboration. We plan to continue engagement and information sharing with retailers throughout the demonstration period. Strategies may include:

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- The launch and updating of a dedicated website where retailers can access up-to-date information, training materials, FAQs, and approved/restricted item lists.
- A retailer email listserv to distribute real-time updates, key implementation milestones, and technical guidance.
- Ongoing stakeholder meetings with retailers of all sizes to address questions, gather feedback, and ensure broad representation and engagement.

Staff Capacity and Training

- *Describe the State's staffing capacity to administer the project and the policy training plan on the alternative procedures required by the project.*
 - *Will the State designate a specific team for the project? If so, please describe it.*

Idaho plans to use existing staff resources from the SNAP program, communications team, and agency leadership to support planning, outreach and implementation activities for the demonstration. The SNAP program will lead efforts working with retailers and key stakeholders. The Department's communication teams will develop messaging and materials that will be used by all stakeholders to deliver consistent messaging about changes to allowable product purchases. The SNAP operations team, including eligibility workers and customer service staff, will help answer customer questions and complaints. Department leadership will work with elected officials to provide updates on the demonstration, including challenges and successes identified as the program is implemented.

Communication Plan:

States must develop a strategic roll out plan for communicating this project to impacted populations for FNS approval. FNS expects ongoing and frequent outreach to SNAP-eligible individuals and retailers throughout the planning process and implementation phase of this project. We also encourage outreach to relevant stakeholder groups and local media to raise awareness of the impending program changes.

- *Describe the anticipated timeframe and details of the State's plan, including any training and communication, to reach the target SNAP population for the project.*
 - *Also describe how communication and training will be provided to SNAP households that become eligible after the project launch.*
- *If applicable, describe any nutrition education (ex- SNAP-ed) provided, or planned to be provided, to SNAP-eligible households.*
- *Describe the anticipated timeframe and details of the State's outreach plan, including any training and communication, to reach the participating retailers for the project.*
 - *Also describe how communication and training will be conducted with newly authorized retailers over the course of the demonstration project.*

Idaho is finalizing its preliminary communications plan to support both customer and partner awareness as part of the proposed demonstration. The plan is designed to ensure that SNAP

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participants, retailers and agency staff all receive clear, consistent, and timely information about the changes.

Key components of the communications strategy include:

- Customer communication materials, such as updated brochures, mail inserts, and individual customer notices with simple and clear messaging to support understanding of the new restrictions.
- Staff training for agency employees, particularly those conducting SNAP interviews or handling customer interactions, to ensure they are prepared to explain the changes and answer questions accurately and confidently.
- Retailer-facing resources available through a dedicated website and regular electronic updates that may include signage templates, informational posters and FAQs to support communication at the point of sale.
- Dedicated website to support both retailers and customers throughout the demonstration.

This multi-channel approach ensures that customers are not surprised at checkout, retail staff are not burdened with unexpected questions, and all partners are equipped to deliver consistent, accessible messaging statewide.

Timeline:

- *Provide an overall timeline of expected timeframes and end dates for specific tasks required to achieve project outcomes. This may be presented as a chart or other format (e.g., Gant Chart, Visio). At a minimum, the timeline should include:*
 - *SNAP target population and household communication plans;*
 - *Retailer communication plans;*
 - *Retailer readiness target date(s);*
 - *Go-live implementation, including phases if applicable.*

Proposed Implementation Timeline for Idaho's SNAP Demonstration is based on a 18-month implementation period. This timeline may change based on information gathered during the engagement and discovery phase.

- **Target Approval Date: July 1, 2025**
Idaho anticipates receiving federal approval for the demonstration by this date.
- **Engagement and Discovery Phase Begins: July 2025**
 - Partnership meetings with retailers and key stakeholders
 - Identify existing data sources for evaluation and reporting
 - Collaboration with FNS to develop strategies for creating compliance plans
 - Research and review identified strategies developed by other state agencies
 - Complete retailer/customer/public website build
- **Project Development and Pilot Phase Begins: October 2025**
 - Finalize project implementation plan
 - Retailers begin developing UPC restriction list
 - Create communication materials for retailers, customers and staff
 - Create staff training and materials for communicating with customers

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- Expand website to include customer/public information
 - Identify data sources for evaluating project
 - Develop retailer and customer pilot projects for implementation beginning January 2026
- Implementation Period: June – December 2026
 - Send customer notices
 - Go live Idaho public website
 - Distribute retailer materials
 - Staff training
 - Go live product restrictions
 - Phased in approach of bringing retailers into project – all retailers in compliance by December 31, 2026
- Ongoing Support and Monitoring: January 2027 forward
 - Continued communication with retailers and stakeholders
 - Develop compliance strategies
 - Create and implement evaluation plan
 - Develop reporting timelines and submit required federal reports

Justification for Request:

Explain how the demonstration project will benefit the administration of SNAP in the State and improve the delivery of SNAP benefits to eligible households. Use the space below to describe how implementing this demonstration project will achieve the intended objectives, for example:

- *Describe how the project will impact administrative burden.*
- *Describe how the project will strengthen strategies to encourage healthy choices, healthy outcomes, and healthy SNAP families.*

According to the Idaho Behavioral Risk Factor Surveillance System Data, in 2022, more than 145,661 Idaho adults, nearly 10 percent of the state population, were living with diabetes.

In general, people with diabetes are more likely to have severe symptoms and complications if they get sick from any virus, regardless if they have type 1, type 2, or gestational diabetes. The risk for severe sickness is likely to be lower if the diabetes is well managed.

Idaho, like most states, is seeing a steady increase in the percentage of its population that is overweight or obese. According BRFSS, the percentage of Idaho adults aged 18 and older who report having obesity increased from 20.5 percent in 2001 to 31.6 percent in 2021.

The same is true for Idaho youth. In 2021, 28.1 percent of Idaho high school students described themselves as slightly or very overweight, and 11.9 percent were obese, according to the Youth Risk Behavior Survey.

Obesity rates vary by population and county. Idahoans who are Hispanic, Latino, American Indian and Alaskan Native experience the highest obesity rates, as do those who live in Canyon and Power counties compared to people living in Valley County, for example.

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To impact overweight and obesity, communities must come together to ensure supports are in place for families and individuals. Idaho submits this demonstration request with the goal of improving the overall health and well-being of Idahoans by aligning SNAP purchases with nutritional standards that support long-term wellness. This proposal directly supports the intent of 7 CFR 271.2, which outlines SNAP's purpose: to permit low-income households to obtain a more nutritious diet through normal channels of trade.

By excluding specific items, such as candy and soda as defined in state legislation, this demonstration would help ensure that SNAP dollars are used for food items that contribute to, rather than harm, a family's health. These restrictions are not intended to be punitive; rather, they are a public health strategy intended to support informed, healthy purchasing choices for all participants.

This demonstration is being designed to impact 100% of Idaho's SNAP population, offering a consistent, statewide approach that guides SNAP funds toward more nutritious options and helps reduce the purchase of foods associated with chronic disease. Idaho believes this initiative would strengthen the program's mission and reinforce the state's responsibility to use public resources in a way that promotes the long-term health and self-sufficiency of its residents.

Proposed Evaluation Procedures:

Demonstration projects must include an evaluation component to determine the project's effects. FNS will require quarterly evaluation reports during the first year of implementation. Thereafter, States will be required to report on an annual basis.

Use the space below to describe how the State plans to evaluate the demonstration project and measure the intended outcomes and benefits, for example:

- *Describe what data will be collected as part of this project.*
 - *FNS strongly encourages the State to collect data on food and beverage purchase consumption and health outcomes by interviewing recipients and collecting qualitative data on food purchasing habits and non-SNAP spending either through a collection of food purchase receipts or a 24-hour dietary recall.*

Idaho currently is exploring program evaluations to identify the impact and effectiveness of the proposed demonstration project. One option is the use of Medicaid data to analyze health conditions commonly associated with dietary choices, such as type 2 diabetes, cardiovascular disease, and weight-related diagnoses among SNAP-eligible individuals. Utilizing existing data, Idaho would establish a baseline at the time of implementation. We would develop an evaluation protocol to review data to determine if changes made that restrict food and beverage products reduce the prevalence of health conditions associated with consumption of unhealthy foods.

Another option being explored is to utilize Idaho's SNAP-Education (SNAP-Ed) program to develop and implement education programming and evaluation to change SNAP and SNAP-eligible individuals' behaviors on the consumption of products with high levels of sugar content.

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Idaho's current SNAP-Ed implementer is well positioned to take on this work as current programming focuses on redirecting individuals away from high sugar content purchases. The state's current SNAP-Ed implementing agency has dietitians and researchers on staff who can design interventions and evaluations to better understand the impact on participant behavior and retailer operations.

Redemption and Transaction Data Monitoring

Idaho will collaborate with FNS and state retailers to obtain EBT redemption data to identify SNAP purchasing behaviors prior to implementation of the healthy food choice waiver and at intervals throughout the demonstration project. Data elements may include the following information:

- Establishing baseline data collection prior to the demonstration implementation.
- Regular analysis of transaction data following implementation to monitor:
 - In-state vs. out-of-state SNAP usage,
 - Shifts in redemption trends related to excluded items,
 - Changes in where and how SNAP benefits are spent,
 - Potential retailer or customer adaptations in response to the restricted items policy.

This structured data collection will help Idaho measure the direct impacts of the demonstration over time and assess whether the intended outcomes, such as healthier purchasing decisions, are effective. Findings will also inform adjustments and future recommendations for scaling or refining the approach.

SNAP-Eligible Individuals

- *Describe how the State will evaluate the impact of this project on program administration and program access.*
- *Describe how the State will measure client satisfaction.*

In addition to the evaluations described above, Idaho may identify ways to determine if SNAP-eligible individuals continue to have access to approved retailers in their communities. This may be done through evaluating changes to number and locations of approved retailers. This evaluation can be completed by reviewing data at the time of implementation and over time to identify changes in the number and locations of retailers approved to redeem SNAP benefits.

SNAP-Authorized Retailers

- *Describe how the State will evaluate the impact of this project on program administration and program access as it relates to retailers.*
- *Describe how the State will measure retailer satisfaction.*

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Redemption and Transaction Data

- *Describe how the State will track and evaluate out-of-state transactions in bordering states.*

Idaho borders with multiple states, including Washington, Oregon and Utah, where customers are known to shop in bordering states. We will rely on relationships with retailers and FNS to obtain data to identify any significant changes in purchase patterns after the demonstration is implemented.

- *FNS will require the following additional data be provided:*
 - *Client complaints about the pilot project;*
 - *Retailer complaints about the pilot project;*
 - *Any additional feedback on the pilot project provided by key stakeholders (e.g., grocer associations or community-based organizations); and*
 - *Out of state transaction data to determine cross-border shopping transactions.*

Idaho maintains a structured process for receiving and addressing customer and provider complaints through a centralized resolutions unit. This escalation path currently accepts complaints about retailers and from retailers. As part of the communications and outreach efforts, Idaho will publicize how customers, retailers and the public can contact the SNAP program with complaints, questions, and feedback related to the demonstration. In addition, the Idaho Department of Health and Welfare Director's office also has an escalation path that can be utilized to respond to inquiries about the demonstration project. Both channels track questions received and information provided. Our existing pathways allow for program transparency, promote two-way dialogue, and ensure that stakeholders and the public have a clear and accessible method for sharing their experiences and concerns throughout the duration of the pilot.

Anticipated Implementation Date:

Provide the anticipated implementation date. FNS will provide technical assistance, as it relates to this waiver, to help the State reach the goal implementation date.

Note: States should submit a demonstration request at least six months before their anticipated implementation date.

At this time, Idaho is anticipating implementation of the demonstration will begin January 2026 with a small pilot project and begin a phased in approach starting June 2026, with all retailers in compliance by December 2026. This implementation timeline is based on a July 1, 2025 approval date. As we gather information from key stakeholders, the timeline for implementation may be adjusted based on timelines for retailers to get systems in place and operationalize restrictions for certain candy and soda products.

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Anticipated Program Costs:

Use the space below to describe what additional expenses will be incurred to implement this pilot project. This could reflect costs associated with noticing clients and retailers, EBT system changes, evaluation contract support, or other items not listed here.

Idaho plans to utilize existing resources and staffing to absorb the costs for this demonstration.

Anticipated Expiration Date:

June 30, 2030

Signature of requesting official:



Alex J. Adams, PharmD, MPH

Director

Idaho Department of Health and Welfare

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Appendix

Impermissible Projects

Section 17(b)(1)(B)(iv) of the Act explicitly prohibits waivers of certain provisions of the Act. FNS is unable to approve projects that involve a waiver of these provisions.

Impermissible eligibility criteria waivers

Healthy Food Choice demonstration projects may not:

- Change the definition of household for those living in Federally subsidized housing for older adults, group living arrangements, domestic violence shelters, homeless shelters, and drug and alcohol treatment centers), institutions, or boarding houses (Sec. 3(m)(4) and (5));
- Change the gross income standards of eligibility for households that do not have an elderly or disabled member to a level other than 130 percent of the Federal Poverty Level (Sec. 5(c)(2));
- Change the work requirements exemption for parents or household members caring for with dependent children under the age of 6 or caring for an incapacitated person (Sec. 6(d)(2)(B));
- Increase the shelter deduction for households with low or no out-of-pocket housing costs; or
- Deny benefits to an otherwise eligible individual or household (last sentence of Sec. 5(a)).

Impermissible State operations waivers

Healthy Food Choice demonstration projects may not:

- Waive the requirements (Sec. 11(e)(2)(B)) for States to:
 - Provide timely, accurate and fair service to SNAP applicants and participants;
 - Develop a SNAP application; and if the State has a website, make the application available on their website in every language a printed application is available;
 - Allow a household to apply on the same day they first contact a SNAP office during office hours;
 - Consider an application with only name, address, and signature to be filed on the date of application;
 - Require an adult representative to certify that the information on the application is true and that all members are citizens or eligible aliens;
 - Provide a method of certifying and issuing benefits to homeless households; or
 - Determine applicant eligibility within 30 days of the date of the filing of an application (time standard in Sec. 11(e)(3)).
- Change the provisions outlining which parts of the Act are not allowed to be waived;
- Absolve a State from acting with reasonable promptness on substantial reported changes in income or household size;

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- Prohibit States from operating a Workfare Program or change the 50/50 matching provisions for workfare activities, including reimbursements for participants in workfare activities;
- Waive provisions of the Simplified SNAP (an optional program for TANF households);
- Waive the State Option to issue benefits to individuals who are not compliant with the work requirements established by welfare reform. If the State issues benefits to these individuals, they must pay the Federal Government back and will not receive Federal match for those recipients.
- Change the 50/50 Federal reimbursement provisions;
- Change QC system requirements, payment error rate, and associated liability process for payment error rates; or
- Change 50/50 Federal reimbursement provisions for eligibility systems.

FNS is available to answer questions and provide technical assistance to States requesting demonstration projects. If you are unsure whether your State's request would require an impermissible waiver, please contact FNS.

Additional Restrictions on Demonstration Projects

- Demonstration projects may be approved for up to five years with extensions possible thereafter.
- If a demonstration project reduces benefits by more than 20 percent for more than 5 percent of households in the project area (excluding households whose benefits are reduced for failure to comply with work requirements), the demonstration project:
 - cannot affect more than 15% of households in the State AND
 - may not continue for more than 5 years unless the Secretary approves an extension request.
- Demonstration projects **may not**:
 - Provide benefits in the form of cash or a manner otherwise non-restricted to food (except for a project approved before August 22, 1996);
 - Allow SNAP funds to be used to fund other public assistance programs, or use the funds for any purpose other than the purchase of food, program administration, or employment and training activities; or
 - Count SNAP benefits as income or resources for tax purposes, welfare, public assistance programs or any other Federal, State, or local assistance program (Sec. 8(b)).