

Supplemental Nutrition Assistance Program (SNAP): Aligning Federal Food Policy with Metabolic Health

Beginning with SNAP Incentives and Added Sugar Reduction

Summary

Federal food programs shape the daily food environment for tens of millions of Americans. Thoughtful, evidence-informed policy reforms can improve diet quality, strengthen purchasing power, and generate real-world evidence to guide future policy decisions.

The Coalition for Metabolic Health (CMH) believes federal food policy should better reflect strategies that support metabolic health. The Supplemental Nutrition Assistance Program (SNAP), as the nation's largest nutrition assistance program, offers a practical and measurable starting point.

Evidence suggests that the most effective way to improve the nutritional quality of foods purchased through SNAP is to pair incentives for healthier foods with targeted limits on less healthy items while preserving participant choice.

CMH supports a focused, evidence-based approach within SNAP that expands incentives for whole and minimally processed, nutrient-dense foods while placing targeted limits on added sugar, particularly in beverages. This approach is practical, administratively feasible, and designed to generate evidence for future refinement.

Why CMH Supports Incentives for Whole and Minimally Processed Foods and Limits on Sugar-Sweetened Beverages

CMH believes SNAP reform should begin where definitions are clear, implementation is feasible, and the scientific foundation is strong.

Whole and Minimally Processed, Nutrient-Dense Foods

- **Strong historical and scientific foundation.** Dietary patterns that emphasize whole, minimally processed plant and animal foods—including fruits, vegetables, meats, eggs, legumes, nuts, seeds, seafood, dairy, and modest amounts of whole grains—are consistently associated with favorable metabolic health outcomes.
- **Consistent with global and contemporary evidence.** Diets high in processed carbohydrates and added sugars, and low in dietary fiber, have long been associated with increased risk of metabolic dysfunction, type 2 diabetes, cardiovascular disease, depression, and poorer overall health outcomes—further underscoring the importance of shifting dietary patterns toward higher-quality, minimally processed foods.
- **Aligned with federal dietary guidance.** These foods form the foundation of the 2025 Dietary Guidelines for Americans.
- **Economic access challenge.** Many of these foods may be more expensive and less accessible for lower-income households.
- **Effective and aligned with existing SNAP authorities.** Federal law permits SNAP incentive programs such as the Gus Schumacher Nutrition Incentive Program (GusNIP), which currently reaches about 200,000 SNAP participants per month out of roughly 42 million SNAP participants nationwide. Research shows that a 30% SNAP incentive can increase purchases of healthier foods by up to 20%. CMH supports expanding and scaling these evidence-based incentives to improve diet quality and metabolic health.

Aligning SNAP incentives with whole and minimally processed foods may help shift purchasing patterns toward dietary patterns associated with improved metabolic health.

Added Sugars—Particularly in Sugar-Sweetened Beverages

- **Clear federal definitions already exist.** Added sugars are defined and disclosed on the Nutrition Facts label.
- **High-confidence target.** Sugar-sweetened beverages are the [leading source of added sugars](#) in American diets and provide calories with minimal nutritional value.
- **Strong and consistent research base.** Sugar-sweetened beverages are among the [most consistently studied](#) dietary exposures in nutrition science, with a large and convergent body of evidence linking their consumption to [obesity](#), [type 2 diabetes](#), [depression](#), [cancer](#), and [cardiovascular disease](#).
- **Lower administrative burden.** Beverages are simpler to classify than most foods.
- **Highly measurable.** SNAP transaction data enables rigorous evaluation of purchasing and substitution patterns.

Taken together, these factors make reducing added sugar exposure—particularly from beverages—a scientifically defensible and administratively practical starting point.

CMH's Proposed Directional Framework for SNAP

CMH encourages an incremental, evidence-generating approach within SNAP that:

- Explores strategies to reduce added sugar exposure, particularly from sugar-sweetened beverages (SSBs). Definitions of SSBs vary across federal waivers, state proposals, and research studies, including prior SNAP food restriction [waiver proposals submitted to USDA](#). For purposes of this framework, SSBs are defined as beverages containing more than 10 grams of sugar per serving, excluding beverages containing animal or plant-based milk or 100% fruit or vegetable juice.
- Complements [proposed efforts](#) by the USDA to increase the availability of healthy staples in authorized retailers and strengthens incentives for whole, minimally processed, nutrient-dense foods including:
 - Fruits and vegetables
 - Dairy
 - Animal and plant protein (including eggs, poultry, seafood, meat, beans, peas, lentils, legumes, nuts, seeds, and soy)
- Preserves participant choice and dignity
- Expands education and access to healthier foods
- Evaluates purchasing patterns, substitution effects, operational feasibility, participant and retailer experience, and health-related outcomes
- Builds an evidence base to inform future policy decisions

CMH supports pairing financial incentives with complementary SNAP education efforts that increase awareness of the health benefits of the nutrient-dense whole foods emphasized in the Dietary Guidelines for Americans and the New Food Pyramid. This incremental approach strengthens access to higher-quality foods while generating real-world evidence to guide future policy refinement.



CMH also believes that policy changes within SNAP should be paired with a continued commitment to strong program funding. Adequate support is essential to enabling healthier food choices, as reflected in recent [research](#) using grocery transaction data. Increases in SNAP benefit levels were associated with higher purchases of fruits, vegetables, legumes, and other minimally processed foods, as well as reduced purchases of sugar-sweetened beverages. These findings underscore the importance of maintaining sufficient benefit levels to support food security and ensure that incentive-based reforms work as intended.

What CMH is Not Recommending

This targeted framework:

- Does **not** regulate ultra-processed foods
- Does **not** restrict staple or cultural foods
- Does **not** change SNAP eligibility or benefit levels
- Does **not** mandate dietary patterns

Affordability and Dignity

CMH supports policies that preserve dignity and choice. Aligning incentives with whole, minimally processed foods while carefully addressing added sugar exposure can:

- Preserve participant autonomy
- Reduce stigma
- Increase purchasing power
- Expand access to healthier foods

Why It Matters

Improving metabolic health requires aligning federal food environments with what science consistently supports. Beginning with SNAP—by prioritizing whole, minimally processed foods and addressing [added sugar in beverages](#)—offers a practical and defensible first step.

This approach advances meaningful progress while preserving flexibility for continued refinement as new evidence emerges.

At its core, CMH's position reflects a simple principle: **Americans should have affordable and reliable access to [foods and food environments that support metabolic health](#)**. Aligning SNAP incentives and standards with this principle is a practical first step toward that goal.