# TN SNAP Food Restriction Demonstration Waiver Request

**Type of Request: SNAP FOOD RESTRICTION**

**Date of Request: 9/30/2026**
**State: TN**
**Region: SERO**

**Statutory Citations:**

7 U.S. Code § 2026(b)

**Regulatory Citations:**

7 CFR § 282.1

**Summary of Food Restriction Demonstration Project Request:**

Tennessee requests a demonstration project to modify the definition of foods allowable for purchase under the Supplemental Nutrition Assistance Program (SNAP) as authorized by Section 17 of the Food and Nutrition Act of 2008. The State's goal is to promote healthier eating habits among participants, supporting improved health outcomes and reducing diet-related conditions by encouraging the use of SNAP benefits for more nutritious food options.

**Proposed Alternative Procedures to Operate Project:**

***SNAP-Eligible Food and Food Products Amended by the Food Restriction Demonstration Waiver***

Under the proposed demonstration project, Tennessee will exclude from the definition of eligible SNAP foods the following items:

a) "Processed foods" that list sugar as the first ingredient, excluding single-ingredient sugars used for cooking and baking. "Processed foods" are foods altered from their natural state through processes such as heating, mixing, milling, canning, freezing, or adding ingredients.

b) Beverages that list carbonated water and sugar as the first two ingredients. Beverages that list aspartame or other low-or-non-caloric sweeteners as the first two ingredients remain eligible for purchase.

c) This pilot project does not pertain to the purchase of infant formula. Accordingly, all infant formulas remain eligible for purchase with a SNAP EBT card.

This change supports efforts to address poor nutrition and chronic disease among families with low-income. The project will leverage retailer systems to ensure compliance through UPC-based filtering.

**SNAP-Eligible Household Considerations:**

***Participating Households and Individuals***

This initiative will be implemented statewide and apply to all SNAP recipients purchasing food within the State of Tennessee.

To provide consistency in compliance, minimize customer confusion, and facilitate a seamless transition for both recipients and retailers, the project will be implemented across all SNAP-approved retail locations within a defined timeframe. The State will not explore a phased approach based on household factors.

**SNAP-Authorized Retailers Considerations:**

***SNAP-Authorized Retailers Participating in the Food Restriction Demonstration Waiver***

This initiative will be implemented statewide and apply to all authorized SNAP retailers within the State of Tennessee. This includes online retailers, retail chains, large- and medium-sized retailers, convenience stores, wholesale suppliers, and small, locally owned businesses.

To provide consistency in compliance, minimize customer confusion, and facilitate a seamless transition for both recipients and retailers, the project will be implemented across all SNAP-approved retail locations by October 1, 2027.

TN will engage retailers and stakeholders to gather input, identify potential barriers, and ensure implementation is collaborative and practical. Retailer associations will help identify key stakeholders from a range of retailers including large chains, medium-sized stores, small businesses, convenience stores, mom-and-pop shops, and online retailers. Communications resources will be developed based on retailer and stakeholder input and made available through a TN Department of Human Services (TDHS) webpage. Available assets will include an FAQ, standardized messaging, signage templates, talking points for retailer staff, and other information that supports clear, uniform communication.

***Consideration of Retailer Size***

TN will work with the retail community to develop strategies that support retailers of varying sizes. The State will also collaborate with other states to identify approaches in use elsewhere that can be adapted for use in TN.

***Retailer-Level System Changes***

TN will work closely with the retail community during the discovery phase of this project to identify retailer-level impacts and system changes. The State will provide initial and ongoing information to support retailers during implementation, including clear definitions of what products are allowable and unallowable under SNAP to comply with modifications included in this waiver. TN's goal is for all retailers statewide to implement modifications while allowing flexibility in how retailers integrate the modifications within point-of-sale systems.

Costs and technical requirements for implementing system changes to comply with this waiver will be borne by retailers. TDHS will collaborate with other states to identify opportunities to leverage existing technology and cost-effective approaches to implementing eligible product modifications.

**Impacts to the State Agency:**

***State-Level System Changes***

TN 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. Changes will be operationalized by retailers using UPC-based restrictions and will not require modification of the State's eligibility or benefit issuance systems.

***Food Restriction Pilot Compliance Plans***

Like other states requesting healthy food choice waivers, TN does not have regulatory authority to approve, sanction, or monitor retailers for compliance with federal program regulations. TN will ask retailers to complete an attestation form affirming compliance with the terms of this waiver.

TN is committed to effective implementation and stakeholder collaboration and will engage with the retail community throughout the demonstration period. Strategies to support full implementation may include:

a) A dedicated webpage where retailers can access up-to-date information, FAQs, and training materials
b) A retailer email listserv to distribute updates, key implementation milestones, and technical guidance
c) Ongoing stakeholder meetings with retailers of all sizes to address questions, gather feedback, and ensure broad representation and engagement

The State will also collaborate with other states to identify strategies in use elsewhere that can be adapted for use in TN.

***Staff Capacity and Training***

TDHS Family Assistance, Public Information and Legislative Office (PILO), and leadership teams will contribute to implementation efforts. The Department will develop messaging and materials used by stakeholders to deliver consistent messaging about changes to allowable product purchases. TDHS Family Assistance operations staff at all levels, including eligibility workers and customer service staff, will help answer customer questions.

**Communication Plan:**

TN's communications plan will support recipient and retailer awareness of the demonstration project and emphasize simple and clear messaging about changes. Components of the communications strategy will include:

a) Customer communication materials with clear messaging to support understanding of the changes
b) Training materials for TDHS and partner staff who interact with SNAP customers, to ensure staff are prepared to explain the changes and answer questions accurately and confidently
c) Retailer-facing resources available through a dedicated webpage and electronic updates, such as signage templates, informational posters, and FAQs to support communication at the point of sale
d) Dedicated webpage to support customers throughout the demonstration

The State's communications strategy will ensure that customers are not surprised at checkout, retail staff are not burdened with unexpected questions, and TDHS and partner staff are equipped to deliver consistent, accessible messaging statewide.

**Timeline:**

TN's implementation timeline is estimated to last nine (9) months from inception to full implementation. The timeline below may change based on information gathered during the engagement and discovery phase.

| Milestone | Date |
|---|---|
| Target approval date | Feb 1, 2027 |
| Engagement and discovery phase begins<br>• Partnership meetings with retailers and key stakeholders<br>• Identification of existing data sources for evaluation and reporting<br>• Research and review of peer state strategies<br>• Website development | Oct 2025 |
| Project development phase begins<br>• Finalize implementation plan<br>• Retailers begin developing UPC restriction list<br>• Develop communication materials<br>• Create training materials<br>• Website updates<br>• Identify data sources for evaluating project | June 2027 |
| Training<br>• Launch public information campaign<br>• Distribute retailer materials<br>• Release TDHS and staff partner training | August 2027 |
| Full Implementation<br>• All retailers in compliance by October 1, 2027 | Sept 2027-Oct 2027 |
| Ongoing support<br>• Continued communication with retailers and stakeholders | Oct 2027 Forward |

**Justification for Request:**

The Food and Nutrition Act of 2008 as amended emphasizes nutrition and health. This demonstration project will encourage nutritious choices that improve health outcomes for SNAP participants. Limiting the purchase of products with high sugar content under SNAP aligns SNAP benefits with public health goals while preserving access to essential groceries, ensuring SNAP dollars are used for foods that contribute to, rather than harm, health.

This demonstration project is a public health strategy intended to support informed purchasing choices for all participants. TN believes this initiative will strengthen SNAP's mission.

**Proposed Evaluation Procedures:**

The State will develop retailer and customer experience surveys to collect data on food purchasing habits, non-SNAP spending, and qualitative data.

***SNAP-Eligible Individuals***

TN's evaluation strategy will include an assessment of the demonstration's impact on program access as it pertains to customers. Data elements may include changes to the number and locations of approved retailers over time, and the State's customer experience survey will include questions that measure customer satisfaction.

***SNAP-Authorized Retailers***

TN's evaluation strategy will include an assessment of the demonstration's impact on program access as it pertains to retailers. Data elements may include changes to the number and locations of approved retailers over time, and the State's retailer experience survey will include questions that measure retailer satisfaction.

***Redemption and Transaction Data***

TN borders eight (8) states, the most of any state in the nation, and TN's SNAP customers are known to shop in bordering states. TDHS will rely on relationships with the retail community and FNS to obtain the necessary data to identify any significant changes in purchase patterns after the demonstration is implemented.

TDHS maintains a structured process for receiving and addressing customer complaints and will collect customer service data obtained through these channels related to the demonstration project. TN will work with key stakeholders to collect feedback about the initiative.

**Anticipated Implementation Date:**

Retailers will be in compliance by October 1, 2027. This timeline assumes a February 1, 2027, approval date. TN may adjust this timeline based on information gathered from key stakeholders.

**Anticipated Program Costs:**

TN plans to use existing resources and staffing to absorb the costs associated with this demonstration project.

**Anticipated Expiration Date:**

September 30, 2028, with continued approval/extension of the project contingent upon the results of ongoing project evaluation.

**Signature of Requesting Official:**

Leanna Johnston

Digitally signed by Leanna Johnston
Date: 2026.09.30 15:55:22 -04'00'

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