

SNAP Healthy Food Choice Demonstration Waiver Request



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 the US Department of Agriculture (USDA) Food and Nutrition Service (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.**

SNAP Healthy Food Choice Demonstration Waiver Request

Type of Request: SNAP HEALTHY FOOD CHOICE

Date of Request: 10/28/2025

State: OH

Region: MWRO

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 U.S.C. 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)

Ohio requests a waiver to restrict the purchase of sugar-sweetened beverages, such as soda, with Supplemental Nutrition Assistance Program (SNAP) and Summer EBT benefits.

Consumption of these beverages is associated with poor health outcomes, including weight gain and obesity, type 2 diabetes, heart and kidney diseases, nonalcoholic liver disease, tooth decay and cavities, and gout.¹ By excluding sugar-sweetened beverages, Ohio intends to mitigate these health outcomes for SNAP participants.

The goal of this project is to improve short- and long-term health outcomes for SNAP participants and promote healthy purchasing habits.

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.

Ohio requests a waiver to modify the statutory and regulatory definitions of “eligible foods” to prohibit the purchase of sugar-sweetened beverages with SNAP benefits. Ohio defines sugar-sweetened beverages as beverages with sugar, corn syrup, high-fructose corn syrup, or similar caloric sweeteners as the primary ingredient, or as the second ingredient if the first ingredient is carbonated water. Ohio will also apply restrictions on sugar-sweetened beverages to Summer EBT purchases.

¹ [Fast Facts: Sugar-Sweetened Beverage Consumption](#)

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On June 30, 2025, Ohio Governor Mike DeWine issued Executive Order No. 2025-030 to form the Working Group on the Submission of a Waiver Excluding Certain Beverages from SNAP in Ohio. In consultation with key stakeholders, the Working Group - which included the Ohio Beverage Association, Ohio Grocers Association, Ohio Manufacturers' Association, and the Ohio Departments of Health and Medicaid, among others - developed the proposed definition of sugar-sweetened beverages. The restriction will be operationalized by SNAP-authorized retailers based on each individual product's Nutrition Facts label regulated by the U.S. Food and Drug Administration.

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)?*

Sugar-sweetened beverages, defined as beverages with sugar, corn syrup, high-fructose corn syrup, or similar caloric sweeteners as the primary ingredient, or as the second ingredient if the first ingredient is carbonated water.

- *If applicable, describe incentivization projects to entice SNAP-eligible households to increase purchasing of fruits and/or vegetables.*

N/A

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

As of May 2025, Ohio's SNAP caseload includes 1,450,955 recipients.² Approximately 39.5 percent of the State's recipients are children; 17.2 percent are elderly adults; and 14.7 percent are non-elderly individuals with a disability.³

² [Supplemental Nutrition Assistance Program: Number of Persons Participating \(Data as of August 8, 2025\)](#)

³ [Characteristics of Supplemental Nutrition Assistance Program Households: Fiscal Year 2023](#)

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The requested waiver will apply to 100 percent of the Ohio SNAP population. The pilot will not be phased in; the demonstration project will be effective for all SNAP-eligible households immediately upon the implementation date.

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?*

The requested waiver would apply to all Ohio SNAP-authorized retailers, including brick-and-mortar stores, participating online platforms, and specialty retailer types. Participation will not be phased in; the demonstration project will be effective for all SNAP-authorized retailers immediately upon the implementation date.

Consideration of retailer size

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

Feedback provided at the Governor's Working Group meetings highlighted the importance of providing adequate preparation time for SNAP-authorized retailers following FNS's approval of the waiver. Adequate preparation time will help ensure successful implementation by retailers and also provide time for outreach and education to SNAP recipients.

The Governor's Working Group recommended, and Ohio is requesting, a six-month grace period for all SNAP-authorized retailers following the implementation date. This period will allow for system and operational updates.

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.*

Based on discussions with SNAP-authorized retailers in the State, Ohio anticipates retailers will be able to implement point-of-sale system upgrades, staff retraining, and workflow changes to accommodate the new restrictions within the six-month implementation period.

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Ohio does not plan on providing exemptions for retailers that are unable to implement the required system changes. If implementation barriers arise, ODJFS will coordinate with FNS to provide technical assistance to support timely compliance.

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?*

Ohio does not anticipate State-level system changes or updates to operate the demonstration project. The proposed waiver would require revision to the definition of “eligible foods” under Ohio Administrative Code [Rule 5101:4-1-03](#).

Ohio operates Summer EBT, and restrictions under this waiver will apply to Summer EBT purchases.

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?*

The State of Ohio will coordinate with USDA to communicate the implementation of this waiver as USDA enrolls and regulates retailers for the SNAP program. Ohio will educate existing retailers about which items may be purchased with SNAP and utilize the existing reporting channels to alert USDA FNS of known suspected noncompliance. After the project launch, the State will continue to provide technical assistance to existing and new SNAP-authorized retailers.

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.*

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- *Will the State designate a specific team for the project? If so, please describe it.*

The demonstration project will be implemented by ODJFS. The State will use existing resources to support training on and administration of the demonstration project. ODJFS will work with staff, SNAP-authorized retailers, and other key stakeholders to develop consistent and effective messaging, training, and business procedures to support successful waiver implementation.

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.*

Ohio will develop a detailed communication plan, which will include frequent and ongoing outreach to SNAP participants, retailers, and other key stakeholders. Ohio has already begun engaging stakeholders through its Working Group. Prior to receiving waiver approval, Ohio will continue outreach to the SNAP-authorized retailer community and advocacy groups to inform the development of communication and outreach materials, ensuring the materials are content neutral as well as relevant and effective to particular stakeholder groups (e.g., retailers, participants, and advocacy groups).

Communication and outreach materials may include, but are not limited to, printed or digital explainers, press releases, social media campaigns, talking points for program staff and retailers, SMS reminders, retailer webinars, and in-store signage. The State will develop materials tailored to the needs of both existing SNAP recipients and retailers and those that become eligible or authorized for SNAP post-waiver implementation.

Additionally, a notice will be directly mailed to all currently eligible SNAP recipients.

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;*

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- *Retailer communication plans;*
- *Retailer readiness target date(s);*
- *Go-live implementation, including phases if applicable.*
- Ohio will submit the waiver request to FNS by October 28, 2025.
- Following submission, Ohio will:
 - Continue engaging with SNAP-authorized retailers and other key stakeholders
- In the two months after approval, Ohio will:
 - Begin rolling out communication resources
- In the four months prior to implementation, Ohio will:
 - Continue to develop community and outreach materials for retailers and participants (including printed or digital explainers, social media campaigns, SMS reminders, retailer webinars, and/or in-store signage)
 - Collaborate with the Ohio retail community to troubleshoot implementation issues, as needed
- Ohio anticipates implementation by July 1, 2026, or October 1, 2026.
- In the six months after implementation, Ohio will:
 - Continue working with retailers to troubleshoot implementation issues, as needed
 - Continue regular outreach and communication to retailers and participants
- Starting six months after implementation, Ohio will:
 - Begin evaluating and monitoring the demonstration project

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.*

The goal of this demonstration project is to better align Ohio's SNAP program with the program's objective of helping low-income households meet their nutritional needs.

As of 2019, 37.8 percent of Ohio's adult population was considered obese; 12.6 percent was diagnosed with diabetes; 7.6 percent with heart disease; and 35.6 percent with hypertension. Additionally, in 2021, 43 percent and 19.6 percent of Ohioan adults reported consuming fruit and vegetables less than one time daily, respectively.⁴

In combination with education and outreach, a restriction of sugar-sweetened beverages will encourage SNAP households to spend their benefits on healthier alternatives or other nutritional SNAP-eligible foods and promote overall household nutrition. In the long term, the project aims to reduce the prevalence of chronic health conditions like obesity, diabetes, heart disease, and hypertension among SNAP-eligible households.

⁴ [Ohio State Health Assessment, Population Health](#)

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The demonstration project is not expected to increase administrative burden.

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.*

Ohio will implement a comprehensive evaluation strategy to assess the impact of these restrictions. This will include participant and retailer feedback, as well as monitoring relevant health and nutrition outcomes using state and federal data sources, as available.

The evaluation may be conducted by an independent third-party evaluator with experience in public health, nutrition policy, and collaboration with retailers. The evaluation will be designed to measure both health outcomes and behavioral changes among SNAP recipients, as well as operational impacts on retailers and program administration.

The evaluation may use a combination of existing program data (e.g., participation rates, timeliness, call center data) and new data collection (e.g., surveys, interviews) to determine the project's effects. As appropriate, these data sources and collection methods can be leveraged across evaluation topics.

The evaluation may assess long-term health effects among SNAP recipients, including:

- A1C levels
- Blood pressure
- Cavity development
- Other relevant indicators of chronic disease risk, such as obesity and type 2 diabetes prevalence

Where feasible, Ohio may leverage Medicaid claims data to support analysis of health outcomes, recognizing limitations in claims data for capturing comprehensive health status.

SNAP-Eligible Individuals

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

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- *Describe how the State will measure client satisfaction.*

Ohio will evaluate the impact of the demonstration project on program administration, access, and client satisfaction by monitoring several key indicators throughout the implementation and pilot period. These include:

- **Application processing times:** Ohio will track whether the waiver affects the speed and efficiency of SNAP application processing, particularly during the initial rollout and in the months following implementation.
- **Participation rates and redemption patterns:** Ohio will analyze whether the waiver influences overall participation in SNAP.
- **Stakeholder feedback:** Ohio will engage advocacy organizations, community-based groups, and SNAP outreach partners to gather feedback on how the waiver affects access and usability for participants.

These data points will be collected and analyzed to ensure that the waiver does not unintentionally reduce access to SNAP benefits or increase administrative burden for applicants and participants.

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.*

Ohio will evaluate the impact of the demonstration project on SNAP-authorized retailers and the level of retailer satisfaction by collecting both quantitative and qualitative data from a sample of participating retailers, including large grocery chains, independent grocers, convenience stores, and specialty vendors.

The key components of the evaluation will include:

- **Structured interviews and surveys** to assess:
 - Retailers' understanding of the waiver requirements
 - Operational challenges, including system updates, staff training, and customer interactions
- **Administrative burden assessment** to document the time, cost, and staffing resources required to implement the restrictions. This includes:
 - Point-of-sale system modifications
 - Staff retraining efforts
 - Adjustments to inventory and checkout workflows
- **Retailer participation:**
 - Ohio will track the number of SNAP retailers before and after implementation of the waiver

This evaluation will help Ohio identify areas where additional support or clarification may be needed.

Redemption and Transaction Data

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

Redemption and Transaction Data: Tracking and Evaluation of Out-of-State Transactions

Ohio will monitor out-of-state transaction data to assess whether the waiver leads to increased cross-border shopping. This evaluation will help determine the waiver's impact on program integrity and participant access.

Key components include:

- **Ongoing monitoring:** Reports will be generated in collaboration with Ohio's EBT processor to track changes in out-of-state transaction patterns.
- **Program integrity assessment:** Findings will be used to assess whether cross-border shopping undermines the waiver's goals or creates unintended barriers to access.
- **Responsive adjustments:** Based on the analysis, Ohio may adjust its communication strategies, outreach materials, or enforcement protocols to address any identified issues and ensure consistent implementation across regions.
- *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.*

Additional Data Reporting

Ohio will provide the following data to FNS as part of its ongoing evaluation and monitoring of the demonstration project. Key components include:

- Client and retailer complaints about the pilot project
- Feedback from key stakeholders
- Out-of-state transaction data to assess cross-border shopping behavior

These data will be included in evaluation reports and used to inform continuous improvement of waiver implementation.

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.

If FNS approves the request by January 1, 2026, Ohio requests an implementation date of July 1, 2026.

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If FNS approves the request by March 1, 2026, Ohio requests an implementation date of October 1, 2026.

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 notifying clients and retailers, EBT system changes, evaluation contract support, or other items not listed here.

Ohio does not anticipate expenses related to notifying clients and retailers or changes to the EBT contract.

Anticipated Expiration Date:

Ohio requests a period of 2 years from the implementation date, with the option to request three annual extensions thereafter for a total period not to exceed 5 years.

Signature of requesting official: *Hannah Knies*

State Contact:

Name: Hannah Knies
Email: Hannah.Knies@jfs.ohio.gov
Telephone:

Regional Office Contact:

Name:
Email:
Telephone:

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;
- 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);

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- 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)).