



Protecting Food Choice in the Free State of Colorado

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The Supplemental Nutrition Assistance Program (SNAP) is a **critical tool in reducing food insecurity and supporting the well-being of low-income individuals and families**. Attempts to mandate what foods SNAP recipients can purchase undermine the program's effectiveness, restrict personal choice, and harm the very households the program aims to serve.

Flawed Data Should Not Drive Policy

Proponents of purchase restrictions frequently cite the USDA's Food and Nutrition Service (FNS) report, *Foods Typically Purchased by SNAP Households*, as justification for limiting food choices.¹ However, this report has significant methodological issues that make it an unreliable basis for policy decisions:



- **Household Identification Bias:** The study only counts transactions where more than 50% of the purchase was made with SNAP benefits, likely missing households that split payments across multiple transactions to manage tight budgets.
- **Misclassification of Beverages:** The report miscategorizes certain beverages, including unflavored seltzer, as “soft drinks,” which contributes to misleading conclusions about purchasing habits.
- **Retailer Limitations:** The data comes only from large grocery stores, excluding purchases from farmers’ markets and other small retailers that play a crucial role in food access across Colorado.
- **Missing Purchases:** The report fails to account for all SNAP spending, reporting an average of \$229 spent per month per household, even though the average benefit in 2011 was \$284.

¹ fns-prod.azureedge.us

America's Food System Needs to Change

Whether they are using SNAP benefits or not, American households prioritize essential foods—such as dairy, meats, grains, and produce—over discretionary items. Research shows that the grocery shopping habits and diets of SNAP participants are **statistically similar** to those of other households.



USDA's own analysis of nationwide grocery data found that SNAP and non-SNAP households focus spending on a small number of **similar food categories**, with the top five categories making up roughly half of food expenditures for both groups.² In fact, soft drinks were the top item for both groups, comprising only about 5% of SNAP households' food spending versus 4% for non-SNAP households.³ Both groups were equally likely to buy items like salty snacks, cookies, and ice cream in small proportions,⁴ underscoring that **SNAP users do not purchase “junk food” at significantly higher rates than everyone else.**

A comprehensive review of diet studies found **no significant differences** in the consumption of major food groups or nutrients between adults on SNAP and other low-income adults.⁵ There was no difference in intake of meats, dairy, fats, or sweets, and average consumption of almost all nutrients (besides fiber) was the same.⁶ Most studies also reported **no gap in fruit and vegetable intake** between SNAP participants and non-participants.⁷

As one analysis summarized, the dietary patterns of SNAP participants are essentially **on par with the general population**, meaning that a small segment of Americans with limited incomes is being unfairly singled out despite eating similarly to everyone else.⁸ The **problem of poor diet quality is systemic**, not confined to SNAP families.

² fns-prod.azureedge.us

³ fns-prod.azureedge.us

⁴ fns-prod.azureedge.us

⁵ pmc.ncbi.nlm.nih.gov

⁶ pmc.ncbi.nlm.nih.gov

⁷ pmc.ncbi.nlm.nih.gov

⁸ frac.org

SNAP Restrictions Harm More Than They Help

Efforts to restrict SNAP purchases often rely on paternalistic and punitive views of poverty rather than addressing systemic barriers to healthy eating. Research underscores the dangers of such policies:

- A study published in the *American Journal of Public Health* warns that imposing **nutritional criteria on SNAP purchases could deepen existing racial and economic inequities, undermine personal autonomy, and ignore systemic barriers to healthy eating**.⁹ The policy risks disproportionately harming Black, Indigenous, and Latine communities, who are already more likely to experience food insecurity, higher rates of diet-related illnesses, and economic barriers to healthy eating. Instead of addressing the root causes of poor nutrition—such as poverty, lack of healthy food options due to geography or price, and underfunded public health initiatives—SNAP restrictions scapegoat individual consumer choices while doing nothing to improve access to affordable, healthy foods.
- Findings from *JAMA Health Forum* indicate that **SNAP participants overwhelmingly oppose restrictive policies**, with surveys consistently showing that they favor **program expansion, higher benefit levels, and more access to healthy food over government-imposed limits on purchases**.¹⁰ In one national study, over 75% of SNAP recipients opposed food purchase restrictions, while 81% supported policies that would increase their ability to buy fresh, healthy foods. This aligns with broader public opinion research indicating that the vast majority of low-income individuals and families want more access to affordable nutritious options, not paternalistic rules governing their purchases.
- The Food Research & Action Center (FRAC) highlights that **reducing consumer choice does not lead to healthier eating habits and that incentive programs, rather than restrictions, have proven more effective in encouraging nutritious purchases**. For example, the USDA's Healthy Incentives Pilot (HIP) in Massachusetts offered a financial incentive (30 cents back per SNAP dollar) for fruits and vegetables; as a result, participants consumed approximately 26% more fruits and vegetables than non-participants.¹¹ This success demonstrates that empowering people to buy *more* healthy food is far more effective than punishing them for buying a presumed “bad” food.

⁹ <https://ajph.aphapublications.org/doi/10.2105/AJPH.2024.307863>

¹⁰ <https://jamanetwork.com/journals/jama-health-forum/fullarticle/2827156>

¹¹ catalog.data.gov

Cost Barriers Are the Real Issue

Restrictive policies ignore the fact that healthier foods are often more expensive. For low-income families, cost is a primary obstacle to better nutrition. A Harvard meta-analysis found that eating a nutritious diet costs about **\$1.50 more per day** than eating an unhealthy diet – which amounts to **\$550 more per person each year**, an insurmountable barrier for a person with a low income.¹²



It's no surprise, then, that in one survey **61% of SNAP participants reported the price of healthy foods as the biggest barrier** to improving their diets.¹³ Simply put, SNAP users want to buy healthy foods, but their limited budgets often force difficult trade-offs. **Banning certain foods does nothing to make vegetables and high-fiber foods more affordable**; it only adds shame and complexity for those already facing economic hardship.

Massive Administrative Burden & Cost to Taxpayers

Implementing food restrictions within SNAP would impose significant administrative burdens at the federal, state, and retailer levels. The USDA has evaluated these proposals and concluded that limiting SNAP food choices is both *conceptually flawed and impractical*.¹⁴

Implementing such restrictions would require retailers to update their checkout systems, reprogramming product databases to flag “allowable” and “non-allowable” items. **States would have to train staff, develop and distribute new rulebooks, and coordinate compliance with thousands of authorized retailers**.¹⁵



Maintaining an updated list of every single food item that is permitted or banned would be an almost impossible task—**there are over 650,000 food and beverage products** on the market

¹² news.harvard.edu

¹³ frac.org

¹⁴ frac.org

¹⁵ frac.org

(with roughly 20,000 new items introduced each year).¹⁶ Defining which of these are “nutritious” or “junk” would entail **substantial bureaucratic costs to categorize and constantly update** in real-time.¹⁷

Past legislative debates recognized this problem: even back in 1964, the idea of restricting food stamps was **rejected due to the administrative complexity and burden it would create**, and the 1977 Farm Bill similarly noted that such restrictions would not address nutrition issues but would heavily complicate program operations. In practical terms, strict purchase rules could also lead to **confusion at the checkout and even loss of benefits**. For instance, if a family’s EBT card is denied for certain items and they cannot easily find allowed substitutes, some of their allotted assistance might go unspent, effectively reducing the help they receive.¹⁸

Complexity of Defining "Nutrient-Dense" Foods

Recent debates over proposed SNAP pilot programs raise concerns about the arbitrary nature of defining “nutrient-dense” foods. According to the USDA Dietary Guidelines, nutrient-dense foods must provide vitamins, minerals, and other health-promoting components while containing little added sugar, saturated fat, and sodium.

While this definition may seem clear, it quickly becomes problematic in practice.



Deciding which foods meet nutrient-density criteria is extremely complicated. There is tremendous variety in the food supply—and as noted, hundreds of thousands of different products. Creating a definitive list of “good” and “bad” foods would be a herculean task prone to constant revision.¹⁹ **Many foods fall into undefinable gray areas depending on preparation or fortification.**

- For example, **would a whole-grain, low-sugar cereal be allowed but the same cereal with added dried fruit (hence higher sugar) be banned?** The complexity is endless. Even clearly wholesome foods could fail a strict test: foods like whole milk and yogurt, granola, white rice, or canned beans with added sodium might not qualify under certain nutrient thresholds.

¹⁶ [brookings.edu](https://www.brookings.edu)

¹⁷ [brookings.edu](https://www.brookings.edu)

¹⁸ [frac.org](https://www.frac.org)

¹⁹ [brookings.edu](https://www.brookings.edu)

- Common pantry staples and flavorings could be prohibited despite their cultural or culinary importance—**items like hot sauce, soy sauce, or pickles might be excluded** for having too much salt, and **even lean meats or poultry** could get caught up in arbitrary fat or sodium limits. This illustrates how a well-intentioned idea can morph into a tangle of rules that defy common sense.

Overly simplistic bans don't account for context—an item that might be seen as less nutritious (like a sweetened yogurt) can be part of a healthy meal for a child who otherwise might not get enough calcium or calories that day, for instance. SNAP shoppers, like anyone, deserve the flexibility to balance taste, nutrition, budget, and family preferences without a strict government-approved food list micromanaging their carts.

Resisting SNAP Cuts under the Guise of “Healthy Diets”

Importantly, creating new SNAP food restrictions could set a **dangerous precedent** that threatens the program's integrity. Once we start down the path of dictating food choices, it opens the door to lawmakers further micromanaging or even cutting SNAP benefits under the guise of “nutrition” or cost-saving. If program participants have access to fewer foods, **lawmakers may reason that their benefits should be lower**. Previous farm bills have shown that such measures would be **costly to implement, with unclear responsibility for the expense—whether federal administrators, state agencies, or retailers (who might pass costs onto consumers)**.²⁰



In other words, complex restrictions would make SNAP more expensive to run, and those costs could end up reducing the funds available for benefits themselves. This would **undermine SNAP's core mission** by potentially lowering benefit levels or shifting resources away from the people who need food assistance the most. Any proposal that makes it harder for families to use SNAP effectively is a step in the wrong direction.

²⁰ [frac.org](https://www.frac.org)

A Better Path Forward

Rather than imposing restrictive policies that stigmatize and limit food choices, Colorado's advocates, lawmakers, and communities should work together to pursue **positive, evidence-based strategies** that truly improve nutrition for low-income families:



1. **Expand Access to Healthy Foods:**

Increase the availability of fresh, affordable food in underserved areas through initiatives like farmers' market incentive programs, support for food co-ops, and the expansion of grocery retailers in rural and urban food deserts. For example, nearly **39.5 million Americans live in neighborhoods with limited food access**.²¹ Colorado can build upon programs like Double Up Food Bucks, which matches SNAP dollars spent on produce at farmers' markets, to make healthy foods more accessible while supporting local agriculture.

2. **Improve Food Affordability by Strengthening SNAP:**

Ensure SNAP benefit levels are sufficient for families to buy the nutritious foods they need without unnecessary trade-offs. This could include **pushing for higher base benefits or more frequent adjustments to reflect food price inflation**. When families don't have to choose between healthy groceries and paying the rent, they can follow dietary advice much more easily. **Stronger benefits directly translate to improved diet quality** – and research shows that boosting SNAP not only reduces hunger but also yields downstream savings in healthcare by reducing diet-related diseases.

3. **Address Systemic Barriers to Healthy Eating:**

Tackle the root causes that make it hard for low-income families to eat well. This means going beyond individual choice to confront issues like food deserts (geographic lack of healthy food outlets), lack of transportation to grocery stores, and economic instability. If a mother has to take two buses to reach a supermarket or if a father working two jobs only has time to shop at the corner store that stocks mostly processed snacks, those are **systemic problems** not solved by telling them what not to buy.

²¹ aecf.org

4. **Leverage Incentives Rather Than Restrictions:**

Research has shown that positive reinforcement, such as nutrition education and **financial incentives for healthy food purchases, is more effective in improving dietary quality** than punitive measures. Instead of restricting choices, Colorado can champion programs that reward SNAP participants for buying fruits, vegetables, and other nutrient-dense foods. The success of the aforementioned Healthy Incentives Pilot (which boosted produce intake by over 25% with a simple rebate) is a strong proof of concept.²² **Advocating for federal grant support to innovate on SNAP incentives can nudge purchasing patterns in a healthier direction *without* reducing the dignity or autonomy of SNAP clients.** Such incentive-based approaches align with what SNAP participants themselves want – more access to affordable healthy foods. By empowering consumers, we can create lasting improvements in diet quality.

Conclusion

SNAP is a lifeline for many Coloradans, and attempts to impose SNAP food purchasing mandates are rooted in misleading data and paternalistic narratives rather than sound public policy. The evidence is clear that SNAP recipients do not consume diets markedly worse than others, and that **restrictive measures would add costs and complications without delivering promised health benefits.**

Protecting food choice ensures that all families—regardless of income—can make the best decisions for their health and well-being. Colorado must firmly reject unnecessary SNAP purchase restrictions and instead focus on expanding access to nutritious, culturally appropriate, and affordable food for all.

Sources:

- USDA FNS: *Foods Typically Purchased by SNAP Households*
- *American Journal of Public Health*: "Safeguarding SNAP as an Effective Antihunger Program: Myths and Potential Harms of Adding Diet Quality as a Core Objective"
- *JAMA Health Forum*: "Participant Support for Changes to the Supplemental Nutrition Assistance Program"
- *Food Research & Action Center (FRAC)*: *SNAP Consumer Choice Research Brief*
- Politico reporting on SNAP pilot proposals and budget negotiations

²² catalog.data.gov