

Towards a more equitable Gus Schumacher Nutrition Incentive Program (GusNIP): Recommendations for program reauthorization and implementation

Introduction

Eating fruits and vegetables (FVs) is associated with decreased risk of chronic diseases, yet few Americans consume the recommended amounts of FVs. FV intake is lower among people with low incomes relative to those with more resources. The Gus Schumacher Nutrition Incentive Program (GusNIP) addresses these issues by providing financial incentives (subsidies) for the purchase of FVs to people participating in the Supplemental Nutrition Assistance Program (SNAP). GusNIP is thus an important tool for increasing equity in FV access and intake. However, opportunities exist to make GusNIP even more equitable. This white paper suggests approaches to enhancing equity in GusNIP, including increasing program funding to expand SNAP participant access. We include recommendations for the 2023 Farm Bill and recommendations for the U.S. Department of Agriculture (USDA) administrative actions.

Eating fruits and vegetables (FVs) is associated with decreased risk of chronic diseases, including cardiovascular disease, type 2 diabetes, and some types of cancer.^{1, 2, 3, 4} The 2020 Dietary Guidelines for Americans emphasize the prominent role of FVs in a healthy diet.⁵ Yet only one in ten Americans consume recommended amounts of FVs.⁶ FV intake is lower among people with low incomes relative to those with more resources, in part because FVs are often more expensive than less healthful and extensively marketed foods, such as ultraprocessed products.^{7, 8, 9} In addition, high-quality FVs are not accessible in many economically distressed communities.¹⁰

To address these issues, Congress established the Gus Schumacher Nutrition Incentive Program (GusNIP) and its predecessors, the Healthy Incentives Pilot (HIP) and the Food Insecurity Nutrition Incentive (FINI) programs. GusNIP was authorized in the 2018 Farm Bill with a five-year, \$250 million budget. It is administered by the U.S. Department of Agriculture (USDA).¹¹ GusNIP has two components – the nutrition incentive program, which is the focus of this paper, and the produce prescription program, which we do not discuss. The GusNIP nutrition incentive program awards approximately \$35 million annually in competitive grants to state and local organizations to implement nutrition incentive programs in their communities.^{12, 13} These programs provide financial incentives (subsidies) for the purchase of FVs to people participating in the Supplemental Nutrition Assistance Program (SNAP).

In 2021, USDA's GusNIP COVID Relief and Response initiative awarded an additional \$69 million to active GusNIP and FINI grantees to “address critical food and nutrition security needs of low-income communities, enhance the resilience of food and healthcare systems impacted by the pandemic, and maximize funds reaching participants.”¹⁴ This additional COVID-related funding was allocated quickly to allow for immediate impact on local food economies, household nutrition security, and individual dietary intake.

In 2022, there are approximately 75 active nutrition incentive grants, including 20 recently added through GusNIP COVID Relief and Response initiative.¹⁵

GusNIP is an important and effective tool for increasing equity in FV access and intake. We define equity as “the condition that would be achieved if one’s social status, including race, income and wealth, and place of residence no longer influenced how one fares.”¹⁶ GusNIP nutrition incentives provide benefits to people most impacted by nutrition inequities. For example, an estimated 62% of recent participants were food insecure.¹⁷ Nutrition incentives increase FV purchases and intake among people using them, improve food security, and provide economic benefits to economically marginalized communities.^{18, 19, 20, 21, 22, 23}

However, inequities exist within GusNIP. Successful grantees are often larger, well-established, white-led organizations that have the capacity to generate the required match dollars, prepare competitive grant applications, and administer program activities. Funded GusNIP projects are unevenly distributed across the country.¹⁵ For example, in the 2021 grant cycle, there are many more grantees on the coasts and in the Midwest than elsewhere and close to 70% of nutrition incentive grant funds went to these regions.¹⁵ No funds for nutrition incentive programs have been awarded to Tribal agencies. Projects in under-represented regions and impacted communities (see box) are more likely to be standard or pilot projects with lower funding relative to the large-scale projects found elsewhere.¹⁵ Because Black, Latine, and Indigenous people

Defining equity priority communities and organizations

Throughout this document, we use the term “impacted communities” as shorthand for communities disproportionately impacted by above-average rates of poverty, food insecurity, unemployment, or diseases associated with poor nutrition. They include Black, Latine, Indigenous and lower-income communities.

We also refer to certain organizations as “lower-resourced organizations.” We define these as organizations having lower than average access to funding, social networks, administrative infrastructure, and expertise in securing and implementing federally-funded grants. These organizations are often located within or serve impacted communities. They are often staffed and led by members of the communities they serve.

Implementation of many of the recommendations in this document will require the USDA to develop specific definitions of “impacted communities” and “lower-resourced organizations,” aligned with GusNIP program goals, similar to how the agency has specifically defined “rural communities” and “socially disadvantaged farmers.” For example, supplemental funds for program outreach and promotion or specific types of technical assistance could be reserved for lower-resourced organizations, or only food retailers located in impacted communities might be eligible for support for updating point-of-sale systems to accommodate nutrition incentive redemption.

How other federal grant programs have defined priority communities

To direct funding to impacted communities and address the barriers they encounter when applying for federal funds, some federal agencies have developed criteria to identify these communities for priority funding.

The Centers for Disease Control and Prevention (CDC) Racial and Ethnic Approaches to Community Health (REACH) program requires that at least 20% of the population of the targeted geographic area have incomes below the federal poverty threshold. REACH further stipulates that at least one award is to be made to each of its five priority populations. In addition, the program reserves 32 grants to award directly to American Indian and Alaska Native tribes and associated organizations. The CDC High Obesity Program is available only to land grant universities located in communities with adult obesity rates greater than 40%.

Community Development Block Grants, administered by the Department of Housing and Urban Development, use objective measures of community need, such as poverty, population, overcrowding, age of housing, and population growth lag in relation to other metropolitan areas, to determine the amount of funding.

are under-represented among farmers²⁴ and food retail store owners²⁵ in general, they are also likely under-represented among those who participate in GusNIP-funded programs.

Specific features of the GusNIP program also contribute to inequities (see table below). These inequities create opportunities for GusNIP to advance equity.

Features of GusNIP Contributing to Program Inequities	
Level or Sector	Program Feature
Community/ Organization	<ul style="list-style-type: none"> • Grantees must match federal funds dollar-for-dollar with local resources, creating a barrier to participation for impacted communities. • Organizations located in impacted communities frequently have lower resources, including those necessary to prepare successful grant applications. • The application review process emphasizes the technical merit of the application over community need. For example, current review criteria focus on program design and administration and on prior experience implementing incentive programs. More weight could be given to community characteristics such as level of food and nutrition insecurity and other attributes of community marginalization. • Grants often do not provide sufficient support for operating costs (such as the organizational and community infrastructure needed for successful program implementation). Larger, higher-capacity organizations that can leverage additional funds or in-kind contributions are more likely to be able to overcome this barrier, putting smaller and lower-resourced organizations at a disadvantage. • Participation and leadership by community members in local project design and implementation may be limited.
Partners	<ul style="list-style-type: none"> • Smaller retailers that serve an outsized role in communities with limited food access may find it challenging to participate because of complexities in processing incentives; procuring, storing, and displaying FVs; and marketing to SNAP participants.
Individual	<ul style="list-style-type: none"> • Current funding levels allow issuance of incentives to only a small fraction of SNAP beneficiaries. • People with low incomes who are ineligible for SNAP cannot receive incentives. • Program features such as caps on monthly benefits or requirements for participants to match incentives with their limited SNAP funds may create barriers to participation.

In Spring 2021, a group of nutrition incentive experts* came together to describe approaches to enhance equity in GusNIP, with a focus on provisions of the 2023 Farm Bill and USDA program rules and procedures. Our group consisted of people who work in national non-profit organizations, agriculture outreach centers, and academia. Many were female, most were white, and all were food secure. These positions influence our knowledge, experience, and views. After preparing an initial set of recommendations, we sought feedback from interested parties including FV producers, food retailers, academic experts, Tribal representatives, successful and unsuccessful GusNIP grant applicants, and community members who use nutrition incentives. Final recommendations are summarized in this paper. Future efforts to increase equity within GusNIP should gather additional perspectives from community members and people who use GusNIP as well as from practitioners who implement nutrition incentive programs.

Recommendations for increasing the equity of programs that touch many sectors and partners can be complex. Solutions to one equity issue may create unintended consequences that negatively impact equity elsewhere. For example:

- Increasing the monthly incentive allowance would allow each participant to purchase more FVs, yet a higher per-participant benefit would also reduce the number of people GusNIP is able to serve at a given level of funding.
- Awarding additional operating funds to lower-resourced organizations or impacted communities (to cover activities such as food retailer recruitment, provision of technical support to food retailers, program outreach and promotion, or program management) would likely increase the diversity of funded projects yet may also reduce GusNIP program funds available for direct incentives.
- Collecting the data necessary to qualify for designation as a lower-resourced organization or impacted community may place greater burdens on applicants from the very communities most impacted by inequities.
- Giving some degree of preference to lower-resourced organizations and higher-need communities may increase GusNIP presence in communities experiencing the greatest inequities. However, funding higher-capacity organizations with existing large and efficient GusNIP projects may serve people with similar needs at a lower cost per participant and may therefore increase participation.
- Increasing participation by smaller, locally-owned, minority-owned food retailers may increase equity in retailer participation. However, if participants who typically buy their food from larger chain supermarkets find they are only able to use their incentives at smaller retailers, they may be less likely to use them. If FV prices are higher in smaller stores, then the purchasing power of nutrition incentives is reduced.
- Delivering incentives electronically (for example through an Electronic Benefit Transaction [EBT] card or point of sale [POS] system) rather than by providing a physical object such as a token may facilitate incentive redemption and increase acceptability for participants. However, redemption of electronic incentives requires technology that is more likely to exist in larger, corporate retailers, rather than in smaller, minority or independently-owned stores.
- Integrating nutrition incentives into state SNAP programs may advance equity by expanding the reach of GusNIP projects, making incentives more accessible to more people. However, if the

* Current partners represent the Center for Science in the Public Interest, Harvard Food Law and Policy Clinic, Healthy Food America, Michigan State University Center for Regional Food Systems, University of California San Diego, University of California San Francisco, and University of Washington. This document was not reviewed by USDA and does not represent its views.

project is administered by a state agency, this may reduce opportunities for people from impacted communities to play a role in project implementation.

We held these tensions in mind as we developed our recommendations and, whenever possible, sought to balance them. However, decisions about some of these trade-offs are best made at the local or state project level to reflect the unique needs and values of each site. Thus, in some cases we note when these tradeoffs exist, but refrain from making recommendations as to the preferred approach.

We also recognize that communities differ, and the most equitable and effective approaches to nutrition incentive implementation may vary across communities. Respecting the specific conditions, cultures, priorities, and goals of each community must be balanced with national requirements and guidelines based on evidence and best practices. Communities should have the opportunity to participate in project design and implementation. Thus, USDA must allow some degree of flexibility and autonomy in nutrition incentive implementation while also adhering to national standards.

Recommendations

We offer the following recommendations to Congress and USDA to advance equity in the GusNIP program. For each recommendation we indicate whether action is needed by Congress as it drafts the 2023 Farm Bill or USDA as it implements GusNIP. Note that Congress can use the farm bill to direct USDA to carry out any of the implementation recommendations.

1. Increase GusNIP funding to increase number of people benefitting

Increasing funding so more people using SNAP can benefit from nutrition incentives is the foundation for advancing equity in the GusNIP program. GusNIP grantees have proven that they can enroll SNAP participants into nutrition incentive projects and provide them with access to FVs.¹⁷ However, only a small fraction of people enrolled in SNAP are currently able to access incentives.²⁶ Approximately \$21 million worth of GusNIP nutrition incentives are redeemed annually,¹⁷ but if all 22 million households participating in SNAP received \$20 of incentives per month, the annual cost of incentives alone would be \$5.3 billion. Projects report that available funds for incentives are inadequate to meet demand. For example, funds may be exhausted before the end of the year, or enrollment may be closed to new participants (who may be placed on waiting lists instead). Additional funds are needed to expand the reach of the GusNIP program.

Many of the strategies we recommend for increasing equity within GusNIP will require provision of technical assistance to grant applicants and grantees, especially to lower-resourced organizations and impacted communities. GusNIP currently funds the GusNIP Training, Technical Assistance, Evaluation, and Information Center (NTAE) and the GusNIP Nutrition Incentive Hub to support grantees. With additional funding and authorization to expand the scope of their services, the NTAE and Nutrition Incentive Hub could increase technical assistance, leading to greater diversity among grantees. The farm bill should enable this expansion of technical support.

Additionally, the next farm bill should include a new funding category to support statewide expansion of GusNIP, a critical intermediate step towards national expansion and universal access to nutrition incentives for all SNAP participants. Statewide SNAP incentive programs would provide important insights into scaling nutrition incentives. Farm bill funding would support essential state administrative work and EBT integration.

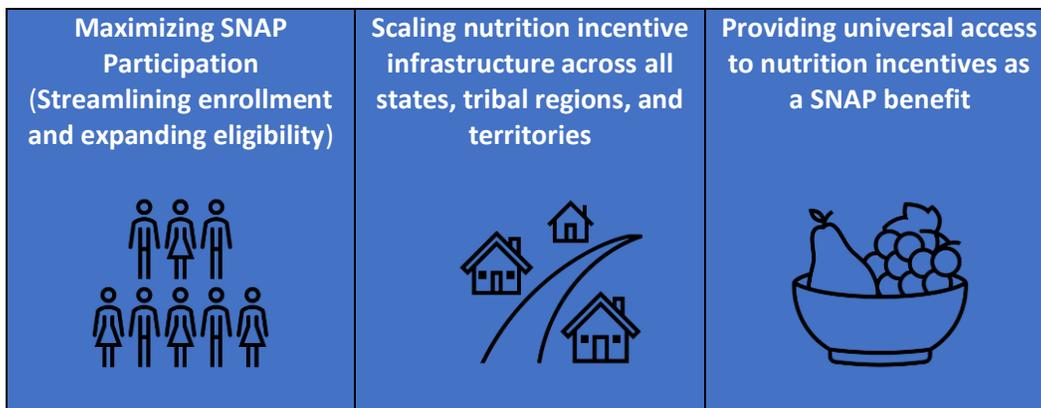
Many other equity-centered recommendations in this report will also require funding. Strategically deployed, increasing appropriations for GusNIP in the next farm bill will make GusNIP more equitable and accelerate equity in food and nutrition security and dietary intake.

Recommendations for GusNIP funding levels in 2023 Farm Bill

- Increase GusNIP appropriations overall to \$1-3 billion per year to expand enrollment and fund the other budget additions discussed in this paper and the following bullets. (FB*)
- Increase funding to the NTAE by \$0.5-1 million per year and extend its scope. Task the NTAE with providing more technical assistance and financial support to lower-resourced organizations and impacted communities so they can secure GusNIP grants and implement projects. Include support for both proposal submission (for example, assistance for designing an effective nutrition incentive program or generating matching funds if they continue to be required) and project implementation (for example, assistance for enhancing organizational capacity, supporting planning activities, expanding outreach and promotion, and facilitating expansion of retail networks to include smaller and minority owned retailers). (FB)
- Increase funding for small projects by \$5-10 million per year to allow smaller and lower-resourced organizations to “get a foot in the door” (see recommendation 3). (FB)
- Allocate \$ 10 million per year to support statewide SNAP incentive expansion systems including state administration, EBT integration, and centralized EBT payment processing. (FB)

*FB indicates recommendation for 2023 Farm bill

Ultimately, leveraging GusNIP to support food and nutrition security for all Americans will require investment across the SNAP system:



2. Eliminate or reduce the requirement for grantee matching of federal funds

GusNIP nutrition incentive grant applicants must match federal funds dollar-for-dollar (50% of program costs funded from GusNIP funds and 50% from applicant sources).¹² Matching sources include cash contributions from public and private sector funders and certain types of in-kind contributions. Federal funds cannot be used as match contributions except in the case of Tribal agencies. The match requirement has become a significant barrier for some applicants, particularly those from lower-resourced organizations or serving impacted communities.

The 2018 Farm Bill defined the matching requirements for USDA National Institute of Food and Agriculture (NIFA) competitive grants, including GusNIP.²⁷ Notably, almost *no* other NIFA grant programs require a match, and those that do set match rates below the 50% match required by GusNIP. Others waive the match requirement if the USDA Secretary deems this is “necessary to effectively reach an underserved area or population,” a condition that is met by the current distribution of GusNIP grantees.

The matching requirement also sets GusNIP apart from other federal programs that address nutrition, social determinants of health, and equity. For example, the CDC REACH program, the CDC Communities Putting Prevention to Work initiative, and the Department of Housing and Urban Development Community Development Block Grants do not have matching requirements. Other federal programs use lower match rates, such as the Department of Justice STOP grants, which require match to cover only 25% of program costs. The federal matching rate for Medicaid is based on state per capita income. The lowest-income states contribute 22-30% in match, while the highest-income states contribute 50%.²⁸ While elimination of match requirements would be ideal, a similar tiered system might be considered for GusNIP.

Changes in how match is calculated could also reduce barriers. Federal dollars could be used as matching funds. For example, the Surface Transportation Reauthorization Act of 2021 allowed a state’s Department of Transportation to use federal Highway Safety Improvement funds as match. Another strategy might be limiting the match requirement to the portion of grant funds reserved for program operation expenses, with no matching funds required for the portion of grant funds reserved for the nutrition incentives.

Recommendations for matching requirement

- Eliminate the requirement for grantee-generated matching funds. (FB*)
- If sufficient funds are not available to eliminate entirely the match requirement, we recommend the following intermediate steps, in order of preference:
 - Limit the proportion of costs that must be covered by grantee-generated matching funds to no more than 10%. (FB)
 - Replace a universal match requirement with a more flexible one tailored to organizational resources and community needs. The size of the match requirement should be reduced for lower-resourced organizations in impacted communities. (FB)
 - The portion of grant funds requiring match should be reduced (for example, only program costs should require matching funds, not nutrition incentives). (FB)
- Provide technical and financial assistance to lower-resourced organizations and impacted communities to help them generate matching funds. (FB and USDA**)
- Clarify and expand what grantee contributions are eligible for inclusion as in-kind contributions. (USDA)

*FB indicates recommendation for 2023 Farm bill

** USDA indicates recommendation for USDA rules and procedures for implementing GusNIP

3. Target grant awards to support and advance equity goals.

Inequities in funding of GusNIP sites are driven in part by the barriers faced by impacted communities when applying for GusNIP grants. Impacted communities often have less capacity to prepare applications. They may propose projects that use non-traditional approaches for program implementation which may not

score as well as typical GusNIP projects, for example emphasizing deeper and more holistic engagement with community members over maximizing number of participants receiving incentives. Grant application reviews may reward proposals with certain writing and presentation styles and favor applications based on technical merit and not sufficiently recognize community need.

Recommendations for targeting grant awards

- Award a minimum number of grants or a minimum proportion of funds to lower-resourced organizations or impacted communities. This could be accomplished from a pool of grant funds awarded through a single request for application (RFA), or by issuing a separate RFA with a dedicated funding level for which only lower-resourced organizations or impacted communities are eligible. (USDA**)
- Engage and support the NTAE to (a) develop criteria to define lower-resourced and impacted communities, and (b) help potential grantees determine whether their organization or community qualifies for such designation. (USDA)
- Increase funding for small-scale pilot projects to allow lower-resourced organizations to develop the experience and skills needed to implement larger projects, while not competing with higher-capacity and more experienced organizations. Grantee matching funds should not be required for pilot projects regardless of any match requirement for regular projects. (FB*)
- Modify grant application scoring so that meeting the following criteria increases the likelihood of funding (USDA):
 - How well the proposed projects address diet quality and diet-related disease disparities.
 - How data and other strategies are used to identify, reach, and engage impacted communities.
 - How well applicant leadership reflects the impacted community and/or is connected with impacted communities as evidenced by experience working in or relationships with the community.
 - How applicant will share power with impacted communities and develop equitable participation and leadership opportunities for community members.
 - The extent to which minority- and women-owned businesses are included as retailers.

*FB indicates recommendation for 2023 Farm Bill

** USDA indicates recommendation for USDA rules and procedures for implementing GusNIP

4. Expand retail opportunities for community-owned food retailers

Currently, 1,615 firms participate in GusNIP, about 0.7% of all SNAP-participating retailers.^{17, 29} GusNIP aims to engage multiple types of food retailers. Among GusNIP nutrition incentive retailers, 69% are farm direct sites (farmers markets, farm stands, mobile markets) and 31% are brick-and-mortar sites (grocery stores, supermarkets, and corner stores).¹⁷ Despite being a smaller percentage of all participating retailers, brick-and-mortar sites redeem the large share of nutrition incentives (55%). Among all the brick-and-mortar sites,

large chain supermarkets and independent supermarkets are most common, each accounting for about 30% of the total number of brick-and-mortar sites.³⁰ Small grocery and convenience stores account for only 8% of sites.

Increasing participation by community-owned food retailers - independent food retailers whose owners reflect the community and who are often Black, Latine or Indigenous people, commonly including small grocery stores, convenience stores, food-co-ops, and farm direct sites - would increase equity in GusNIP. These retailers play an outsized role in impacted communities where long-standing small businesses are more likely to be owned by Black, Latine, or Asian people.^{31, 32} Their locations may improve geographic accessibility for some shoppers—particularly people with physical limitations or limited economic and time resources, such as those who are elderly, hold down multiple jobs, have caregiving responsibilities, are transportation burdened, live with a disability, or reside in communities that lack food access and/or are rural.³³ In addition, these stores may be more likely to stock culturally-desirable foods and may be retailers of choice for some nutrition incentive participants.³⁴ Revenue generated from redemption of nutrition incentives supports these businesses directly and purchases of other products by nutrition incentive participants further increases sales. Offering a greater variety of food retailers for redemption increases participant choice in where to redeem nutrition incentives. These advantages, in many communities, can outweigh the potential disadvantages associated with including these stores, such as potentially higher prices, smaller variety of available FVs, and lack of access to technology needed for electronic nutrition incentive issuance and redemption.

Several barriers limit participation of community-owned food retailers. Grantees may prioritize partnerships with stores with whom they have existing relationships, thus excluding smaller retailers. Enrolling multiple community-owned retailers as nutrition incentive redemption sites requires more effort by grantees, relative to working with a single large corporate retailer that operates several stores in a community. Grantees may lack the capacity (both time and technical skills) to invest in recruiting and supporting small retailers, particularly because these retailers may need more assistance from grantees than participating stores that have technology in place to support redemption processes. For example, the most streamlined system for nutrition incentive redemption is a POS system that automatically triggers a discount on FVs when a customer uses a SNAP EBT card. Yet POS systems are expensive and difficult for local store owners to set up without technical support and resources.

Recommendations for expanding diversity of food retailers

- Consider the number and type of community-owned businesses that have agreed to participate in the GusNIP project when scoring GusNIP grant proposals. (USDA**)
- Assure grantees have the capacity (time, skills, and resources) to provide technical assistance to community-owned retailers for setting up POS systems (or for transitioning to use of the SNAP EBT system for incentive redemptions). NTAE could support grantees in developing these skills and resources given adequate funding. (USDA)
- Provide funds to community-owned businesses to implement POS systems for redemption of SNAP and nutrition incentives. (FB*)
- Support grantees in engaging local vendors to supply FVs to GusNIP retailers, not only in farmer’s markets but also in bodegas, corner stores, and other smaller stores. (USDA)
- Expand other types of support for community-owned businesses participating in GusNIP through loans, expanded Small Business Administration technical support, and procurement preferences. (USDA)

- Include more rural retailers. (USDA)

*FB indicates recommendation for 2023 Farm Bill

** USDA indicates recommendation for USDA rules and procedures for implementing GusNIP

5. Address structural and program design barriers to participation in GusNIP

Impacted communities confront multiple structural and program design barriers to GusNIP participation.

Program awareness. Awareness of GusNIP is low among people who participate in SNAP.^{35, 36} For example, only 31% of those living near a retailer participating in FINI were aware of the program.³⁷ USDA restricts how grant funds for project promotion can be used and provides no guidance on evidence-based promotional strategies.¹²

Digital strategies could be a cost-effective approach to expanding promotion. Advertising through social media and apps is a promising and scalable approach³⁸ given the near ubiquity of smart phone ownership³⁹ and social media usage⁴⁰ by people of all races, ethnicities, and income levels. Digital strategies could also include in-app advertising within EBT management apps, like Fresh EBT, and promotion of the Shop Simple with MyPlate app that already provides GusNIP program locations and could be expanded to include program promotion and marketing.⁴¹ Additionally, SNAP-Education (SNAP-Ed) funds could be used for digital marketing of nutrition incentive programs.

Tailoring program promotions to diverse audiences would also be useful-given the many languages spoken by SNAP participants.³⁷ Approaches might include marketing materials in multiple languages, multilingual volunteers, a bilingual customer hotline, and hiring community members fluent in the preferred languages of local SNAP participants as program and retail staff. Each of these strategies requires additional investment of time and resources.

Access barriers. Some GusNIP participants may face logistical challenges in accessing nutrition incentive retailers. Integrating nutrition incentives into online SNAP redemption is a scalable, long-term solution that could facilitate access. The SNAP Online Purchasing Pilot has rapidly expanded in recent years, particularly with pandemic-related initiatives. However, expanding online access may have unintended consequences that could exacerbate some inequities. Not all people participating in SNAP can readily access online services and delivery fees add costs. Structural barriers also limit online access for many participants with financial hardship.^{42, 43, 44} Larger retailers are more likely to have the capacity to offer online sales, which may exclude participation by local- and minority-owned food retailers.

Nutrition incentive design. How nutrition incentives are issued may limit participation and incentive redemption. Currently, only two-thirds of GusNIP nutrition incentives issued are redeemed, leaving \$10.2 million in unused incentives.¹⁷ Certain GusNIP program features may create barriers to using nutrition incentives. For example, nearly all GusNIP programs (94%) provide participants with a 1:1 (e.g., dollar-for-dollar) match on qualified purchases, with an average match cap of \$20 per day.⁴⁵ Increasing the total value of incentives issued per participant through a higher match rate (e.g., one dollar issued for every 50 cents spent) or higher match cap (e.g., \$30 per day) could increase program participation and increase FV purchases and intake. Raising or eliminating the match cap could be especially meaningful for households that shop less frequently due to limited time, limited transportation, or long distance to the store. For example, Seattle has removed the cap on its Market Match nutrition incentive program using funds generated from its sweetened beverage tax.⁴⁶

The form in which nutrition incentives are provided may also affect participation and redemption. Nutrition incentives may be offered using either electronic methods (e.g., an EBT card) or physical methods (e.g., a token or paper voucher).¹⁷ Approximately 80% of GusNIP-participating retailers use physical incentives, like

tokens and paper vouchers.¹⁷ Electronic incentives could expand access to nutrition incentives, simplify transactions, reduce stigma, improve redemption through elimination of lost vouchers, and streamline program operations. However, electronic methods may also drive nutrition incentive use to retailers with capacity for operating POS systems, often lacking in community stores. This reinforces the need, described above, to provide technical assistance to these stores to implement the appropriate technology for electronic nutrition incentive processing. State integration of nutrition incentives with the existing SNAP EBT card (EBT integration) is an alternative electronic incentive distribution solution that is already underway in states like Massachusetts, Washington,⁴⁷ and California, although many challenges remain.³⁷

Finally, encouraging all grantees to allow participants to use nutrition incentives to purchase fresh, canned, frozen, and dried FVs (instead of just fresh FVs) could make FVs more available to families who shop less frequently or have limited time and resources to prepare fresh FVs, or in seasons when fresh FVs are not available.

Ultimately, many of these recommendations would be addressed through national integration of nutrition incentives into SNAP⁴⁸ so all SNAP participants can utilize incentives at any SNAP-authorized retailer.

Recommendations for reducing design barriers that impede participation

In future farm bill cycles, we recommend integration of nutrition incentives into SNAP at the federal level, allowing *all* SNAP participants to automatically participate in the program. For the 2023 Farm Bill, we recommend provisions to make progress towards this goal, including:

- Provide technical and financial support for implementing electronic nutrition incentive issuance and redemption technology to farmers' markets and community-owned food retailers. (FB* and USDA**)
- Include support for retailers to integrate nutrition incentives in the SNAP EBT Modernization Technical Assistance Center, as online SNAP becomes more widely and equitably available. (USDA)
- Offer funding to states to support development of state or regional infrastructure and retailer capacity (especially among community retailers) to integrate nutrition incentives with existing SNAP EBT cards. (FB)

Additionally, we recommend USDA develop the following program rules, regulations, procedures, processes and RFA design to:

- Expand awareness of GusNIP among SNAP beneficiaries
 - Develop federally-supported, national GusNIP promotions and offer supplemental funding to grantees for community-level promotional activities. (FB and USDA)
 - Include participation by community partners in place-based project outreach and marketing. (USDA)
 - Require GusNIP applicants to explain their approach to reaching diverse participants, such as those with language barriers, and to budget sufficient award funds to support the proposed approach. (USDA)
 - Encourage NTAE to create resources describing effective and scalable evidence-based marketing strategies. (USDA)

- Increase USDA promotion of the Shop Simple with MyPlate app and its GusNIP retailer and program locator function.⁴⁹ (USDA)
- Encourage use of SNAP-Ed funds for social marketing strategies to increase SNAP-Ed reach and GusNIP awareness, such as digital advertising on social media and apps. SNAP-Ed funds should support outreach, marketing and engagement activities conducted by community partners. (USDA)
- Encourage grantees to set incentive match rates and caps to best meet community needs, balancing value of incentive per participant with number of participants (USDA)
- Prioritize making FVs in a variety of forms (fresh, canned, frozen) eligible for nutrition incentives, rather than solely fresh FVs. (USDA)
- Provide an incentive that can be used the same day (discount) rather than for future purchases (rebate). (USDA)
- Support partnerships between state agencies and non-profits to upgrade EBT technology to integrate nutrition incentive programs and SNAP. (USDA)
- Work with companies (e.g., FIS, Conduit) to create less costly, standardized, centralized options for integrating incentives into EBT processing technology for use by all states. (USDA)

*FB indicates recommendation for 2023 Farm Bill

** USDA indicates recommendation for USDA rules and procedures for implementing GusNIP

6. Increase community participation and leadership in GusNIP, from proposal development and project design to implementation and evaluation.

Equitable programming requires authentic participation and leadership from members of communities served by GusNIP projects.^{50, 51} Authentic community participation recognizes the expertise of community members by giving them decision-making power and providing them with appropriate compensation for their time. Project staff should maintain consistent and transparent communication with community members to ensure program accountability and support power-sharing with community.

While GusNIP encourages community participation, it is not a requirement.¹²^{Error! Bookmark not defined.} The 2022 RFA elevates the importance of community participation relative to prior announcements. It asks applicants to describe the needs, capabilities, and assets of the community their program aims to serve, but it does not require community participation or leadership in community assessments. It notes that it is very important to include community members in project leadership, planning, implementation, and evaluation and asks for documentation of community involvement but does not make this a requirement.

Several federal and philanthropic programs require community participation. For example, Housing and Urban Development Community Development Block Grants require grantees to encourage citizen

We use the term “community member” to denote people living in the geographic area served by a GusNIP project who are likely to use nutrition incentives and local, community based GusNIP retailers. These community members, through their lived experiences, are uniquely positioned to say how a GusNIP project should be designed, implemented, and evaluated to meet the specific needs of their community.

participation at all stages and to ensure community needs are met. They must also identify how non-English speaking residents will be included and their needs addressed.⁵² The CDC REACH grants require recipients to engage an established community coalition to help develop projects and to use “community-specific best practices” to implement activities, monitor progress, and oversee community communications. The coalition must have “priority population representatives” as well as a representative from a local community-based organization.⁵³ The Kresge Climate Change, Health and Equity Initiative requires applicants to be a part of a multi-disciplinary partnership and the lead applicant to be representative of the community. Tribal organizations are encouraged to apply, and preference is given to organizations with Black, Latine, and Indigenous leadership and those that partner with underserved communities.⁵⁴ Guides to community participation and power-sharing are available.^{55, 56, 57}

We acknowledge that implementing these recommendations may place additional responsibilities on applicants and grantees, and we have identified mechanisms to support them in meeting these additional requirements.

Increase community participation and leadership

- Require applicants to demonstrate they authentically incorporate the values and needs of their communities into their project. Applicants must partner with community organizations and engage with community members to ensure community needs are identified and prioritized throughout program development, implementation, and evaluation. A coalition or collaborative that includes community partners in leadership roles is one structure that can facilitate this. (USDA**)
- Require applicants to create equitable decision-making structures and processes that lead to power-sharing with communities and describe plans to share information with the community (including how grant funds are used and who receives them, and project impacts and who is benefitting from them). At a minimum, each project should have a Community Advisory Board. (USDA)
- Require applicants to use a community-driven needs assessment process ([example](#)). Applicants needing support for compiling existing assessment data or conducting an assessment could apply for a planning grant (see following recommendation) and/or receive data and technical support from the NTAE. (USDA)
- Offer planning grants that allow prospective applicants to implement community-based application development, needs assessment, and project planning. The work conducted during the planning period would be used to prepare a strong and community-centered application for GusNIP project funding. (FB*)
- Build capacity of grantees to develop authentic community participation in program development, implementation, and evaluation. The NTAE (or another entity with relevant expertise) could receive funding to provide technical assistance to grantees on community participation best practices. A simple supplemental RFA should be offered to support community participation work. (FB and USDA)
- Include community-based organizations and people with lived experience from impacted communities in review of grant applications.
- Encourage grantees to hire community members as part of their project teams and require listing of positions reserved for community members in applications. (USDA)

- Require data in grantee reports on roles played by community members during project implementation. (USDA)
- Require a minimum proportion of grant funds be subcontracted to community-based organizations whose boards, leaders and staff reflect the community being served. (USDA)
- Require grantees to pay community members for their involvement, e.g., as project staff salaries or for time and expenses spent serving as Community Advisory Board members. (USDA)

We recognize that including authentic community participation in state-wide projects may be more challenging than in local ones. We offer the following suggestions for state projects:

- Include community-based organizations representative of the diversity of communities served by the project in state GusNIP coalitions or collaboratives.
- Establish a Community Advisory Board with diverse membership from across the state.
- Hire community members as part of project teams.
- Set aside grant funds to support outreach, promotion, and retailer recruitment by community-based organizations.

*FB indicates recommendation for 2023 Farm Bill

** USDA indicates recommendation for USDA rules and procedures for implementing GusNIP

7. Support development of successful proposals from lower-resourced organizations and impacted communities

GusNIP is a competitive grant program that structurally favors applications from well-resourced organizations with the capacity and experience to submit successful proposals. The application process can be burdensome for lower-resourced organizations that do not have the same assets for preparing polished grants. While GusNIP offers feedback to unsuccessful applicants about why they did not receive funding and ways to improve future applications, proactive support prior to application submission is minimal and limited to a one-hour consultation with the NTAE.¹²

Federal and philanthropic funders have developed mechanisms to support development of grant applications from impacted communities and lower-resourced organizations. The CDC Communities Putting Prevention to Work program included a \$10 million fund to support higher-capacity applicants willing to provide peer-to-peer mentorship to lower-resourced organizations.⁵⁸ The Robert Wood Johnson Foundation Evidence for Action program offers technical assistance services to applicants who propose research that is relevant to advancing racial equity, but whose projects do not meet all of its criteria for rigor, actionability, or research team qualifications. It offers select applicants the opportunity to receive project design consultation or matching services that facilitate partnerships between community-based organizations and experts for developing proposals.⁵⁹ The USDA funded New Entry Program, an initiative of Tufts University's Friedman School of Nutrition Science and Policy, provides free training and technical assistance to applicants or grantees of the USDA Community Food Project's grant program.⁶⁰ The USDA Local Food Promotion Program offers planning grants to help local food businesses develop the groundwork for submitting an implementation grant.⁶¹

Recommendations for supporting proposals from lower-resourced organizations and impacted communities

- Increase support to lower-resourced organizations representing impacted communities for preparing GusNIP grant applications. The NTAE could receive additional funding to provide applicants meeting criteria for impacted communities with more support for preparing competitive applications than is currently available. Support could include NTAE consultation for preparing proposals, review of draft proposals, grant writing and editing services, or online trainings. (FB*)
- Offer planning grants that allow prospective applicants to implement community-based application development, needs assessment, and project planning. This work conducted would be used to prepare a strong and community-centered application for GusNIP project funding. (FB)

Incentivize higher-resourced organizations to submit joint applications with lower-resourced applicants or serve as mentors. This would allow lower-resourced organizations to gain experience and administrative capacity while implementing the joint projects, thereby improving chances of being selected on their own in the next RFA cycle. Incentives could include recognition, monetary compensation, or favorable consideration during the application review process. (USDA**)

*FB indicates recommendation for 2023 Farm Bill

** USDA indicates recommendation for USDA rules and procedures for implementing GusNIP

For additional information about these recommendations, please contact Jim Krieger at jkrieger@hfamerica.org

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