

September 18, 2019

Submitted via www.regulations.gov

Program Design Branch
Program Development Division
Food and Nutrition Service
USDA
3101 Park Center Dr.
Alexandria, VA 22302.

Re: [FNS-2018-0037], “Revision of Categorical Eligibility in the Supplemental Nutrition Assistance”

Dear Sir/Madam:

I am writing on behalf of Prevention Institute to strongly oppose the Food and Nutrition Service’s proposed rule to eliminate the Supplemental Nutrition Assistance Program’s (SNAP) broad-based categorical eligibility option as published in the Federal Register on July 24, 2019 (RIN 0584-AE62; FNS Docket No. 2018-0037). If implemented, the proposed rule would take away essential food assistance from an estimated 3.1 million people and result in the loss of automatic free school meals that 500,000 children rely on to get the nutrition they need to thrive in the classroom.

Founded in 1997, Prevention Institute is a national nonprofit organization dedicated to promoting health, safety, and wellbeing through thriving, equitable communities. Access to nutritious affordable food is an essential building block for health. This rule would contribute to greater hunger and economic instability thus significantly undermining public health. We urge the rule to be withdrawn in its entirety.

SNAP is the nation’s most important anti-hunger program, providing food assistance to youth, working families, people with disabilities, and seniors amongst others. In 2018 SNAP helped 40 million Americans put food on the table in a typical month.¹ Moreover, SNAP supports long-term health and wellbeing and improves educational outcomes for children;² lowers healthcare costs;³ helps families make ends meet;⁴ and fuels local economic development.⁵ In fact, SNAP is a powerful and proven anti-poverty tool, keeping 7.3 million people out of poverty in 2016 alone, including 3.3 million children.⁶

Disqualifying families with modest savings from accessing SNAP benefits as the rule proposes is in direct contradiction to the purported purpose of moving families towards self-sufficiency. These savings are instrumental in helping families weather financial emergencies such as job loss, unexpected housing or car bills, or surprise medical bills without being pushed into—or deeper into—poverty. The rule would also penalize some workers for getting a raise, by creating a sharp benefit cliff that leads to sudden loss of food assistance when wages go up even slightly. Reducing



the amount of SNAP dollars available to spur local economic activity will also harm the economy, grocery retailers, and agricultural producers.

The current proposal notably sidesteps congressional intent as Congress has repeatedly rejected changes to categorical eligibility for SNAP—including most recently through the 2018 Farm Bill. Rather than taking necessary food assistance away from millions of households, we strongly urge you to advance policies to prevent food insecurity in the first place. Thank you for the opportunity to submit comments on the proposed rulemaking.

Sincerely,

A handwritten signature in black ink, appearing to read "Sana Chehimi".

Sana Chehimi
Director of Policy and Advocacy
Prevention Institute
sana@preventioninstitute.org

¹Center on Budget and Policy Priorities. Policy Basics: The Supplemental Nutrition Assistance Program (SNAP). <https://www.cbpp.org/research/policy-basics-the-supplemental-nutrition-assistance-program-snap>. Updated June 25, 2019. Accessed September 18, 2019.

²Carlson S, Rosenbaum D, Keith-Jennings B, Nchako C. SNAP Works for America's Children. Center on Budget and Policy Priorities. <https://www.cbpp.org/research/food-assistance/snap-works-for-americas-children>. Published September 29, 2016. Accessed September 18, 2019.

³Carlson S, Keith-Jennings B. SNAP Is Linked with Improved Nutritional Outcomes and Lower Health Care Costs. Center on Budget and Policy Priorities. <https://www.cbpp.org/research/food-assistance/snap-is-linked-with-improved-nutritional-outcomes-and-lower-health-care>. Published January 17, 2018. Accessed September 18, 2019.

⁴Center on Budget and Policy Priorities. House Farm Bill's SNAP Cuts, Work Requirements Would Hurt Workers. [Brief]. <https://www.cbpp.org/research/food-assistance/house-farm-bills-snap-cuts-work-requirements-would-hurt-workers>. Accessed September 18, 2019.

⁵Wolkomir E. SNAP Boosts Retailers and Local Economies. Center on Budget and Policy Priorities. <https://www.cbpp.org/research/food-assistance/snap-boosts-retailers-and-local-economies>. Published April 6, 2018. Accessed September 18, 2019.

⁶Center on Budget and Policy Priorities. Policy Basics: The Supplemental Nutrition Assistance Program (SNAP). <https://www.cbpp.org/research/policy-basics-the-supplemental-nutrition-assistance-program-snap>. Updated June 25, 2019. Accessed September 18, 2019.