**Template Comment on Proposed Standard Utility Allowance (SUA) Rule**

UPLOAD COMMENT HERE: <https://www.regulations.gov/comment?D=FNS-2019-0009-0001>

After you submit your comments, please send a copy to andrew@cafoodbanks.org

Date DUE BY DEC 2ND

SNAP Certification Policy Branch,

Program Development Division

Food and Nutrition Services

3101 Park Center Drive

U.S. Department of Agriculture

Alexandria, VA 22302

RE:   Proposal – Supplemental Nutrition Assistance Program: Standardization of State Heating and Cooling Standard Utility Allowances (RIN 0584–AE69)

Dear SNAP Certification Policy Branch,

[A sentence or two about your organization, its mission and the geographic area you serve].

[I/we]We take the opportunity to comment in opposition to USDA’s Proposed Rulemaking on the SNAP standardization of state heating and cooling standard utility allowances. The proposed changes would cause serious harm to our organization and our clients, increasing hunger and hardship for more than a million Californians, particularly seniors and people with disabilities. We urge the Department to withdraw this proposed rule.

SNAP is California’s first line of defense against hunger reaching nearly [4 million low-income Californians](https://www.cbpp.org/sites/default/files/atoms/files/snap_factsheet_california.pdf). Statewide, households participating in SNAP comprise a diverse demographic with more than 73% of SNAP participants in families with children, nearly 11% in families with members who are elderly or have disabilities and over 48% in working families.

SNAP is one of our most important anti-hunger programs, as SNAP benefits respond quickly and effectively to changes in need, whether due to economic downturns or natural disasters. According to recent studies, it is estimated that $1 of SNAP benefits leads to between $1.50 and $1.80 in total economic activity during a recession, and every $1 billion in SNAP benefits creates 13,560 jobs. [See “The Supplemental Nutrition Assistance Program (SNAP) and the Economy: New Estimates of the SNAP Multiplier, USDA Economic Research Service, July 2019, available at <https://www.ers.usda.gov/webdocs/publications/93529/err-265.pdf?v=8010.7> pages 6-8 and Table 1 (regarding research by Blinder and Zandi)]. In 2017, [SNAP delivered $6.7 billion in 100 percent federally funded benefits to California](https://www.cbpp.org/sites/default/files/atoms/files/snap_factsheet_california.pdf), driving between $10.2 billion to $12.24 billion in total additional economic activity and creating approximately 92,208 jobs.

According to USDA’s own estimates, the proposed rule would cut SNAP benefits by $4.5 billion over five years nationally, with 19% of SNAP households experiencing a cut to benefits and 8,000 households losing SNAP eligibility entirely. In California, USDA’s Regulatory Impact Analysis estimates SNAP benefit cuts to be even more prevalent, with 25.61% of households experiencing a loss. According to the California Department of Social Services, as of August 2019 there were 2,115,869 SNAP households in California. Using USDA’s estimate for California, the proposed rule will cut SNAP benefits for 571,864 households.

The Administration further acknowledges that the rule would disproportionately impact elderly people and people with disabilities. [Older adults](https://www.sciencedirect.com/science/article/pii/S2214629618309629?via%3Dihub) and [people with disabilities](https://www.ncbi.nlm.nih.gov/pubmed/28501322) already face higher utility and living costs than the general populations, particularly the medical equipment needed to during an emergency such as motorized wheelchairs, breathing apparatus or other life-saving devices. That was put into stark terms when [an older adult died 12 minutes](https://www.latimes.com/california/story/2019-10-11/pge-power-outage-elderly-man-autopsy-heart-disease) after a California utility turned off the power to attempt to prevent sparking a wildfire.

Insert One Full Page describing your food bank’s service area, who you serve, stories of people who are elderly or disabled that you serve – as many details as possible the better. Attach your most recent hunger report.

Like other food banks in California, we already labor to meet the need for food in our community, and would not be able to close the gap in food insecurity created if the proposed rule on the SUA were to be implemented. According to the national food bank network Feeding America, SNAP provides 9 meals for every 1 meal provided by food banks. In the face of the SUA proposal and other threats to SNAP and the safety net, it is vitally important to understand that food banks cannot serve these populations as SNAP does, and both they and we will experience harm. Food banks like ours already operate on thin budgets, to supplement food for our community’s most vulnerable families and individuals. This rule would create particular challenges for food banks to serve older adults and people with disabilities, who often cannot attend food pantries which operate in specific locations for limited times, that pose significant barriers given the extraordinary transportation barriers among these community members. If we were to try and accommodate this need, we would face increased labor, transportation and other costs to provide food in the evenings or on the weekends.

Households who had received SNAP would face significant time and financial strains to attend these distributions by taking public transit during off hours, requiring additional shifts by caregivers they cannot afford, and other hardships to access our resources. Under our current distribution model, food banks already struggle to serve older adults and people with disabilities, who have limited mobility. These households already face several obstacles to access the food they need and the proposed rule would only increase hunger and push people deeper into poverty.

If you are rural food bank: Our rural communities will be particularly impacted, for a number of reasons at the nexus of harm this rule would cause. California’s rural areas have [disproportionately high utility costs](https://www.cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/About_Us/Organization/Divisions/Policy_and_Planning/PPD_Work/PPD_Work_Products_%282014_forward%29/California%20Regions%20Final.pdf), are home to [California’s largest households](https://www.indexmundi.com/facts/united-states/quick-facts/california/average-household-size#chart), and are also where some of the state’s deepest [food deserts](https://www.centerforhealthjournalism.org/2019/03/14/california-s-far-north-vast-food-desert-makes-hungry-kids) exist. Yet, rural communities are already some of the hardest for our food bank to serve, as we face the greatest transportation costs, limited local partners and volunteers, and other barriers.

This USDA rulemaking is yet another attempt to side step Congressional intent and make cuts to SNAP benefits. Although the President’s FY 2019 Budget included a request for a change similar to the proposed rule [<https://www.obpa.usda.gov/32fns2019notes.pdf>], Congress did not include such a change in the 2018 Farm Bill. Indeed, evening out benefit amounts across states by lowering benefits for large numbers of participants does not promote SNAP’s statutory purpose, but instead undermines its statutory purpose.

We strongly oppose the rule that would take food assistance away from more than a million low-income Californians, particularly older adults and individuals with disabilities. The proposed rule will fuel rates of hunger and hardship across California among some of our most vulnerable communities of Californians, and we urge the administration to withdraw this harmful rule.

Sincerely,

YOUR SIGNATURE

YOUR NAME

YOUR TITLE