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September 23, 2019

SNAP Program Design Branch,
Program Development Division
Food and Nutrition Service
3101 Park Center Drive
U.S. Department of Agriculture
Alexandria, VA 22302

Re: Notice of Proposed Rulemaking -- Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP) RIN 0584-AE62

Dear SNAP Program Design Branch:

On behalf of California Food Policy Advocates (CFPA), we appreciate the opportunity to comment on USDA's Notice of Proposed Rulemaking on a Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP). The proposed changes would cause serious harm to working families, seniors, school-age children, and people with disabilities in California, our community, and the nation. The proposed rule is misguided and should be withdrawn.

Introduction

California Food Policy Advocates (CFPA) is a statewide policy and advocacy organization dedicated to improving the health and well-being of low-income Californians by increasing their access to nutritious, affordable food. For over twenty-five years, we have advocated improvements in the operation of federal nutrition programs, including CalFresh, the state's largest food assistance program, known federally as the Supplemental Nutrition Assistance Program (SNAP). Our organization pays very close attention to SNAP because the program plays a critical role in addressing food insecurity and poverty in California,ⁱ and is the first line of defense against hunger for the majority of our low-income residents.

Across California, 4.7 million adults and 2.0 million children live in low-income households affected by food insecurity.ⁱⁱ Food insecurity means having limited, uncertain,



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or inconsistent access to the quality and quantity of food that is necessary to live a healthy life. Having sustained access to enough food is tied to positive social, physical, and mental health outcomes. SNAP/CalFresh plays a critical role in addressing hunger and food insecurity in our community. It is the first line of defense against hunger for 3.9 million low-income Californians and 36 million Americans.ⁱⁱⁱ

The proposed rule would take us backward by removing states' longstanding options to eliminate SNAP asset tests and use a higher gross income test to serve more working households that have significant expenses for shelter and child care. The current policy option is known as "Broad-Based Categorical Eligibility" (or "Cat EI").^{iv}

The Proposal Attempts to Circumvent Congressional Intent

Cat EI policies have been in place for more than two decades. Congress rejected efforts to gut Cat EI, including during its consideration of 2005 budget reconciliation, the 2014 Farm bill, and the 2018 Farm Bill.^v This USDA rulemaking is another attempt to circumvent Congress and is outside USDA's authority. For this reason, and those described below, the proposed rule should be immediately withdrawn.

The Proposal Would Worsen Food Insecurity and Disproportionately Harm Vulnerable Populations

By removing the Cat EI option, the proposed rule would eliminate SNAP benefits for 3.1 million individuals, take free school meals away from the children in those families, and punish people with even modest savings.^{vi} By USDA's own estimates, the proposed rule would cut SNAP benefits over five years by \$10.5 billion, while counterproductively increasing SNAP administrative costs by \$2.3 billion.^{vii} Furthermore, USDA concedes, "The proposed rule may also negatively impact food security and reduce the savings rates among those individuals who do not meet the income and resource eligibility requirements for SNAP or the substantial and ongoing requirements for expanded categorical eligibility."

In California, we estimate that 230,000 - 393,000 or more low-income Californians would lose access to CalFresh.^{viii} A recent study conducted by Mathematica estimates that the proposed changes would cause ten percent of California's SNAP caseload to lose eligibility, an estimated 195,922 households.^{ix} The vast majority of households losing



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vital food assistance will be working families or include seniors or people with disabilities.^x

Categorical eligibility is used to help low-income working families, seniors, and people with disabilities with higher costs of living or modest savings qualify for help putting food on the table. Eliminating categorical eligibility would cause low-wage working families to lose help paying for food when they earn a little more take-home pay, disincentivizing them from working to get a higher wage job or accepting additional work hours from employers. It would also prevent families from moving towards economic security by cutting off help for those with modest financial savings. Building a savings “cushion” is a vital tool for low-income families to escape poverty and achieve economic security. A 2011 Urban Institute study found that, despite very low incomes, forty-four percent of low-income, low-asset households accumulated enough to escape asset poverty after 12 years.^{xi} Removing the asset and resource test in SNAP is an effective means to allow and incentivize such households to accrue savings, avoid economic crises and achieve financial security.

SNAP Supports Work and Economic Mobility

Despite the proposal’s harmful and misleading rhetoric, SNAP participation does not perpetuate a lack of “self-sufficiency” as the proposal states; more often, the opposite is true. SNAP helps close the gaps for individuals struggling to make ends meet by providing a modest subsidy for one basic need, food. Though an insufficient substitute for earned income, that food benefit lessens the financial burden of food expenditures, while freeing up resources for other necessities, like housing and transportation, that make it possible to work. In doing so, SNAP lifted 8.4 million people above the poverty line in 2015—including 3.8 million children.^{xii}

SNAP further supports workforce participation by reducing food insecurity, which is in itself a barrier to employment. A study on the association between food insecurity and cognition found that food insecurity was associated with a decline in executive function, the domain involved with overarching cognitive processes such as reasoning and planning.^{xiii} More generally, food insecurity is associated with higher probability of chronic disease, which bring financial burdens and make it even more difficult to find and sustain work.^{xiv}



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When people can afford nutritious food they are better prepared to learn and develop the skills necessary to get higher paying jobs; we also see increased workplace productivity, and improved physical and mental health outcomes. This rule would place unnecessary barriers between struggling households and programs that help them get ahead.

The Proposal Harm California's Older Adults at a Time When Food Insecurity Among That Population is Rising

While food insecurity has steadily been declining among California's general population, the number of older Californians with limited, uncertain, or inconsistent access to the quality and quantity of food they need to live a healthy life continues to grow at an alarming rate. Based on data from the UCLA Center for Health Policy Research, nearly forty percent of low-income Californians over the age of sixty are food insecure, representing a twenty-one percent increase in the last fifteen years.^{xv} A lack of sustained access to enough nutritious, affordable food is tied to an increased likelihood of chronic disease, hospitalizations, poorer disease management, mental health problems, as well as increased health care spending.^{xvi xvii xviii xix xx} Given these harmful trends, it is critical that we maintain access to proven programs like SNAP that improve food security, rather than cutting access for vulnerable seniors as the Department's proposal would.

Several factors are contributing to higher food insecurity among California's older adults. Income inequality has risen and as the gap between rich and poor has widened, many older adults living on fixed incomes are struggling to afford California's rising costs of living.^{xxi} Rents are already high, but continue to increase.^{xxii} Out-of-pocket health care costs are also going up.^{xxiii} As the cost of meeting basic needs continues to rise, food is often one of the first things to be compromised or dropped from older adults' fixed income household budgets. As older adults are forced into food insecurity, their risk for chronic illnesses increases.^{xxiv} Declining health only further drains household budgets, contributing to a vicious cycle of poverty and poor health outcomes.

In addition to the factors outlined above, racial and ethnic disparities continue to contribute to the rise of food insecurity among older Californians. Our state's older adults are becoming more racially and ethnically diverse, and food insecurity is correlated with race and ethnicity.^{xxv} White Americans have the lowest rates of food insecurity followed



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by other ethnic minorities, Latinx, and Black Americans.^{xxvi} These communities face historical and systemic injustices such as punitive policing, patterns of racial/ethnic segregation, and employment and earnings gaps that impact their ability to achieve wealth, prosperity, and food security.^{xxvii xxviii xxix} The Department's analysis of the impact of the proposed rule fails to account for these disparities in food insecurity and health outcomes by race and ethnicity.

Research findings suggest that poor understanding of the eligibility criteria and a complex and overly burdensome application and enrollment process already contribute to low rates of SNAP participation among older adults.^{xxx} Given the fact the SNAP is proven to reduce food insecurity, the Department should be working to reduce, not increase, the burden associated with applying and enrolling.

The Department Does Not Provide Adequate Data on the Impact Proposed Changes On School Meal Access

The proposed rule would cause harm to low-income K-12 students and the schools that serve them. Loss of SNAP benefits among households that receive SNAP through Cat EI would sever the seamless connection to free school meals for students in households Directly Certified for participation in the federal Free and Reduced Price Meal Program (FRPM).^{xxxi} While the proposed rule as originally posted did not include an estimate of the number of students impacted, USDA subsequently issued an estimate that over 500,000 young students would be cut off from the free school meals.^{xxxii}

Though USDA has provided insufficient information to fully comment on the impact on student meals, it is likely that tens of thousands of California students would lose access to free meals. School meals are sometimes the only nutritious meal participating students eat each day, and help students stay prepared and focused in class to achieve their academic goals.

Loss of SNAP Eligibility Would Cause a Negative “Ripple Effect” On School Meal Access and School District Budgets

Cutting off SNAP for families with school-age children would also mean hundreds of California K-12 schools that serve, or are planning to serve, universally-free meals under the Community Eligibility Provision (CEP) could lose eligibility for the program or make it financially unsustainable to do so. CEP is a non-pricing meal service option for schools



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and school districts in low-income areas. As the USDA website states, CEP “allows the nation’s highest poverty schools and districts to serve breakfast and lunch at no cost to all enrolled students without collecting household applications. Instead, schools that adopt CEP are reimbursed using a formula based on the percentage of students categorically eligible for free meals based on their participation in other specific means-tested programs, such as the Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF).”^{xxxiii} Universally free school meals are particularly important in California where the cost of living and operating a business are extraordinarily high. When breakfast and lunch are served free to every student, the entire school benefits from the elimination of school meal debt, the supportive meal environment that eliminates stigma, and the increase in federal resources that can be put back into the quality of the school meal programs.^{xxxiv}

The proposed rule would also cause a ripple effect on California school districts’ budgets under the state’s Local Control Funding Formula, which targets supplemental funding to high-need schools based partly on the percentage of students receiving free or reduced priced meals.^{xxxv}

Removing or Reducing Food Assistance Has Negative Health Impacts

Access to healthy food is a critical aspect of health; extensive research has found that food insecurity is associated with poorer health outcomes.^{xxxvi} Food insecurity is associated with higher rates of some of the most serious and costly chronic conditions, including hypertension, coronary heart disease, cancer, asthma, diabetes, and other serious health conditions. Adults who experience food insecurity are also more likely to report lower health status overall than those with high food security.^{xxxvii}

The Department fails to calculate the health costs of cutting off food assistance for 3.1 million low-income Americans. As SNAP supports better diets, it leads to better health outcomes and lower medical costs for participants.^{xxxviii} By cutting off SNAP for millions of currently eligible households, more people will be at risk for increased incidence of chronic, preventable diseases, harmful stress and higher health care costs.^{xxxix} For persons with a disability—even one left undiagnosed—the health effects associated with food insecurity may be even more detrimental. Chronic health conditions may be made worse by insufficient food or a low-quality diet.^{xl} The Department’s approach would



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increase chronic disease and health care costs while doing less to lift struggling households out of the cycle of poverty.

SNAP Supports Local Economies and Small Businesses in High-Poverty Areas

The Department provides cost estimates for the reduction in federal expenditures to result from this rule change, but ignores the economic ripple effect that would have. This rule is estimated to reduce SNAP benefit payments by about \$1.88 billion per year. According to USDA Economic Research Service, each \$1 in federal SNAP benefits generates \$1.79 in economic activity.^{xii} Therefore, a \$1.88 billion reduction of SNAP dollars would mean a loss of \$3.36 billion in economic activity annually.

SNAP is also an important support for small businesses in the food production, packaging, shipping, wholesaling, and retail sectors. While the majority of SNAP benefits are used at larger stores, more than three quarters of SNAP authorized retailers are smaller, often locally-owned, stores.^{xiii} These include private groceries, convenience stores, farmers' markets, dairies, butchers, bakeries, and Community Supported Agriculture farm stands. For these small businesses as well as those up the food production and supply chain, SNAP is a vital revenue source—particularly in high-poverty areas.^{xiii} Further, by reducing economic activity in the agriculture, food retail, and shipping sectors, USDA would remove opportunities for entry-level employment among SNAP participants.

SNAP also bolsters local and state government budgets through increased sales tax revenue. The California Legislative Analyst's Office (LAO) asserts that CalFresh benefits help "generate revenue for the state and local governments."^{xiv} Receiving CalFresh benefits can allow households to redistribute income that would normally be allocated to purchasing food. A portion of this redistributed income can be spent on taxable goods, which generates sales tax revenue for the state and counties. This revenue-generating effect occurs soon after CalFresh benefits are issued, as eligible households are, by necessity, more likely to spend (rather than save) any additional income within weeks of it being received.^{xv}

Cutting SNAP/CalFresh funding will reduce state and local fiscal health and exacerbate public funding shortfalls in many California cities and counties, particularly in rural areas.



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According to the Rural County Representatives of California (RCRC), “rural counties face unique challenges when putting federal and state policies into effect. The greater distances, lower population densities, and geographic diversity of RCRC's thirty-six member counties create obstacles not faced by their more urban or suburban counterparts.”^{xlvi}

Conclusion

Cat EI works in California. It helps families as they strive to get back on their feet. Financially responsible choices like establishing modest savings and owning a reliable car to get to and from work help Californians climb the economic ladder towards self-sufficiency. Cat EI for CalFresh allows people to make those choices and still afford healthy food. It also increases administrative efficiency by streamlining enrollment into SNAP/CalFresh. For these reasons and those described above, CFPA strongly opposes the proposed rule that would cut food benefits for struggling people and harm our communities. We strongly urge USDA to immediately withdraw this misguided proposal.

Sincerely,

A handwritten signature in black ink that reads "Jared Call". The signature is written in a cursive, flowing style.

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ⁱ Public Policy Institute of California, “*Improving California Children’s Participation in Nutrition Programs*”, available at <https://www.ppic.org/publication/improving-california-childrens-participation-in-nutrition-programs/#fn-2>

ⁱⁱ CFPA Factsheet, “*Struggling to Make Ends Meet: Food Insecurity in CA*,” available at <https://cfpa.net/GeneralNutrition/CFPAPublications/FoodInsecurity-Factsheet-2019.pdf>

ⁱⁱⁱ USDA Food and Nutrition Service SNAP Data Tables, available at <https://www.fns.usda.gov/pd/supplemental-nutrition-assistance-program-snap>

^{iv} USDA Food and Nutrition Service Fact Sheet, Broad Based Categorical Eligibility, June 2019, available at <https://fns-prod.azureedge.net/sites/default/files/resource-files/BBCE2019.pdf>

^v Congressional Research Service, “*The Supplemental Nutrition Assistance Program (SNAP): Categorical Eligibility*,” Updated 8/1/2019, available at <https://fas.org/sgp/crs/misc/R42054.pdf>

^{vi} Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP), 84 FR 35570 (proposed July 24th 2019), to be codified at 7 CFR part 273, 35575

^{vii} Ibid.

^{viii} Based on 6.2 percent of CalFresh caseload, from Senate Appropriations Analysis of 2013 AB 191 (Bocanegra) available at: http://leginfo.legislature.ca.gov/faces/billAnalysisClient.xhtml?bill_id=201320140AB191

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