California Food Policy Advocates

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December 2, 2019

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

Re: Notice of Proposed Rule Making Regarding Supplemental Nutrition Assistance Program (SNAP) Standardization of State Heating and Cooling Standard Utility Allowances -- RIN 0584-AE69

Dear SNAP Certification Policy Branch:

On behalf of California Food Policy Advocates (CFPA) , we appreciate the opportunity to comment on USDA's Notice of Proposed Rule Making, the "Supplemental Nutrition Assistance Program: Standardization of State Heating and Cooling Standard Utility Allowances, which was published in the federal register on October 3, 2019.

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,[1] and is the most important anti-hunger program 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.[2] Food insecurity means having limited, uncertain, 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.[3]

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CFPA strongly opposes the changes proposed by USDA to alter the methodology for calculating Standard Utility Allowances (SUA) because of the significant harm the change would inflict on California's SNAP participants. According to the Department's own estimates, the proposed rule would: lower monthly SNAP benefits for 26 percent of participating California households, disproportionately harm seniors and people with disabilities, and cause a net cut to SNAP benefits in California, amounting to $54 million annually. As with previously proposed rules,[4] the Administration's estimates likely do not take into account the full range of harm caused by the proposed policy. To estimate accurately the rule's impact on California, better and more recent data are needed. It is clear that USDA's proposed cuts would have harmful impacts on the health and well-being of Californians and our economy while exacerbating the existing struggles many low-income Californians face in paying for food and utilities. We believe the proposed rule is misguided, flawed, and should be withdrawn.

The Proposal Attempts to Circumvent Congressional Intent

SNAP's statutory purpose, as declared by Congress, is "to promote the general welfare, to safeguard the health and well-being of the Nation's population by raising levels of nutrition among low-income households. Congress finds that the limited food purchasing power of low-income households contributes to hunger and malnutrition among members of such households. Congress further finds that increased utilization of food in establishing and maintaining adequate national levels of nutrition will promote the distribution in a beneficial manner of the Nation's agricultural abundance and will strengthen the Nation's agricultural economy, as well as result in more orderly marketing and distribution of foods. To alleviate such hunger and malnutrition, a supplemental nutrition assistance program is herein authorized which will permit low-income households to obtain a more nutritious diet through normal channels of trade by increasing food purchasing power for all eligible households who apply for participation."[5]

The SNAP Standard Utility Allowance deduction methodology and policies have been in place for more than two decades. The Department guidance issued in 1979 encouraged states to set SUAs at levels that would ensure nearly all households would benefit by claiming the SUA rather than providing verification for actual utility costs. The example cited in the guidance set the SUA at the 95th percentile of household utility costs.[6] Many states did so to simplify program administration and reduce error rates. No reference to this guidance is included in the NPRM, and it has not been made available on the Department website. This makes it extremely challenging for commenters to understand, analyze, and comment on the full context of the proposed change.

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This USDA rulemaking is yet another attempt for the Administration to side step Congress and make cuts to SNAP benefits. Congress reviewed SNAP policy during the 2018 Farm Bill, including the fact that states have options that may produce differences in SNAP eligibility benefit amounts from state to state. Although the President's FY 2019 Budget[7] included a request for a change similar to the proposed rule, 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 and instead undermines SNAP's statutory purpose. 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 Department Does Not Provide Adequate Justification for the Rule Change
Benefit levels for SNAP are based on income and other factors, including utility expenses, which can often be deducted from a low-income household's gross income. Policymakers have long recognized that when households use their already limited resources to pay for basics such as housing, childcare, and utilities it affects their ability to purchase adequate and nutritious food. Under current and longstanding law, SNAP takes into account these expenses, including the costs of utilities for each SNAP household, to better reflect participant's true cost of living and to more accurately assess their food assistance needs. For utilities, states adjust household benefits based on a state-specific SUA, calculated by the state and approved by USDA. The current policy allows variances in SUAs to accommodate for differences in utility costs and rates, and allows states necessary flexibility in how they calculate those costs.

The proposed rule would standardize and cap SUA calculations across the country based on survey data. The proposed rule does not adequately explain USDA's rationale for capping the largest of the SUA components by calibrating to utility expense survey data for those no higher than the 80th percentile of low-income people and then capping other SUA components as well. The proposed rule merely asserts that it calculated calibrating to the 50th percentile compared to the 80th percentile. The proposed rule does not adequately explain whether USDA analyzed impacts calibrated to the 85th or higher percentiles, what the results of those estimates were, or the impacts on households with differing characteristics or in different states. The lack of such explanation is particularly concerning given research documented that 21 states had SUAs exceeding the 85th percentile estimates, possibly because of their efforts to mitigate benefit loss for households with very high utility costs.

The Department's Justifications for the Changes are Questionable and Arbitrary
The Department cites as its reasoning for the proposed rule its intent to "help ensure benefit equity across States."[8] However, given that this is the third proposed rule this year alone that

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would enact a cut to SNAP benefits for low-income households, it seems more likely that the true intent is to cut benefit amounts for low-income households. If the Department's intent were truly to achieve better equity across state lines, it could have conducted a more thorough assessment to determine how to raise SUAs in those states in which they are too low. Instead, the Department takes an arbitrary "one size fits all" approach undercutting the longstanding flexibility states have had to administer their SNAP programs. The 1979 FNS implementing guidance purposely "allowed [states] considerable latitude in establishing the methodology for determining the standard."[9] The guidance further states that, "in this context, there is no "right way" or "wrong way" to establish a standard."[10] By comparison, the approach outlined in the proposed rule appears arbitrary, and designed mainly to cut costs and benefit levels. The example methodologies included in the 1979 implementing guidance encouraged SUAs be set at the 95th percentile of utility costs among SNAP households.[11] Given that the proposal includes no justification for the proposed change to uniformly setting the SUA at the 80th percentile, the examples presented provide inadequate support for the proposed change.

The proposed rule also fails to explain which elements of state methodologies are leading to purported unfair or inequitable outcomes between states. There is no justification given for why suddenly, after approving state methodologies for decades, there is a need to change them. By not including that relevant analysis, it is challenging for commenters to provide informed comment on the proposed changes, which appear arbitrary and questionable.

The Option to Use Household's Actual Utility Costs is Not Viable

The NPRM notes that, "States still have the option to not use the HCSUA and take a household's actual costs instead." However, this runs counter to the Department's own original justification for allowing the use of the Standard Utility Allowance, which was to "ease the burden on the eligibility worker in computing the shelter costs deduction, and reduce the quality control error rate for the utility cost component." [12]The 1979 FNS guidance even encourages states to provide an interim report to FNS in order to prevent a significant number of SNAP participants from abandoning the SUA in favor of providing verification of actual costs. As stated on page three of the guidance, "even though State agencies are required to update the standard utility allowance only once a year, State agencies may wish to provide a mechanism for an interim update of the standard if an unexpected increase in utility rates or *some other factor causes increasing numbers of households to abandon use of the standard and begin to claim actual, higher costs* (emphasis added)."[13] On page four of the guidance, FNS encourages states to monitor closely the use of the SUA "versus the use of actual higher costs claimed by households," [because] "If a large number of households are claiming actual expenses and the error rate persists, the standard is not adequate and its value is lost."[14]

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Apart from increasing administrative costs and QC error rates, requiring verification of actual utility costs poses a substantial increased burden on applicants and participants. Utility costs fluctuate widely by region, season, and month to month within the same area. Beyond the variability over time and by region, providing timely and accurate verification of monthly expenses is often very difficult for low-income households, who are more likely to share common utilities with non-household members, move or relocate more often, and incur fines and debt associated with inability to pay bills timely. The Department fails to provide estimates of potential increased QC error rates and lower benefits due to clients' inability to provide accurate verification of actual costs. This is yet another reason it is difficult for commenters to understand, analyze, and comment on the full context of the proposed change.

The Proposed Rule Does Not Discuss the Implications for Food Insecurity and Health
The proposed rule Regulatory Impact Analysis estimates that the proposed changes to state SUAs would cut SNAP benefits by $1 billion a year, on net. Some 7 million people in 3 million households would see a cut. In about half of the states, more than 30 percent of households would be subject to a cut. The average cut among households that experience a cut would be more than $30 a month, but more than $50 a month or more in some of the hardest hit states.

Of the 7 million people that would lose benefits, 68 percent would be in households with children, 29 percent would be in households that contain an individual with a disability, and 20 percent would be in households that contain an elderly member (age 60 or over).

In California, the proposed rule would impact 26 percent of SNAP households, who would on average experience a benefit cut of $10 a month. These cuts are proposed despite the fact that SNAP benefit allotments are already far too low to support an adequate nutritious diet, especially in high cost states such as California. According to a recent analysis, "roughly *half* of all households participating in SNAP are still food insecure, meaning they lack consistent access to enough food to support an active, healthy life. Even those who achieve food security often find it hard to stretch their limited resources far enough to purchase and consume a healthy diet."[15] These data show that SNAP's relatively modest benefits (less than $1.40 per person per meal) are not enough to meet the food security needs of low-income participants.

Access to healthy food is a critical aspect of health; extensive research has found that food insecurity is associated with poorer health outcomes.[16] 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.[17]

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As SNAP supports better diets, it leads to better health outcomes and lower medical costs for participants.[18] By reducing monthly SNAP benefits for hundreds of thousands of households, more people will be at risk for increased incidence of chronic, preventable diseases, harmful stress and higher health care costs.[19] 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.[20] The Department's approach would increase chronic disease and health care costs while doing less to lift struggling households out of the cycle of poverty. The Department fails to calculate the short- or long-term health costs of reducing food assistance for 26 percent of the California SNAP caseload. This is yet another reason it is difficult for commenters to further analyze and submit informed comments.

The Department Does Not Provide Analysis of Disproportionate Impact on Very Low-Income Households

According to the most recent "Home Energy Affordability Gap" estimates published by Fisher, Sheehan & Colton, "Home energy is a crippling financial burden for low-income California households. California households with incomes of below 50 percent of the Federal Poverty Level pay 30 percent of their annual income simply for their home energy bills. Home energy unaffordability, however, is not only the province of the very poor. Bills for households with incomes between 150 percent and 185 percent of Poverty take up 7 percent of income. California households with incomes between 185 percent and 200 percent of the Federal Poverty Level have energy bills equal to 6 percent of income."[21]

In the recent past, low-income Californians have been subject to dramatic and unforeseen increases in utility costs. For example, the Western U.S. energy crisis of 2000 led directly to an 800 percent increase in wholesale electricity prices from April - December 2000.[22]

The above factors indicate that under the proposed rule, low-income Californians already burdened by high utility costs as a share of income would see their limited purchasing power further erode due to cuts in their monthly SNAP allotment. The Department provides no analysis of this disparate impact on the lowest-income SNAP participants, making it difficult for commenters to further analyze and submit informed comments.

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

According to the NPRM Regulatory Impact Analysis, "The proposed rule changes, in particular the provision that would standardize the HCSUA, have the greatest impact on households that

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include an elderly or disabled individual."[23] Illogically, the proposal comes at a time when food insecurity and poverty are rising among California's older adult population.

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 number and rate. Based on data from the UCLA Center for Health Policy Research, nearly 40 percent of low-income Californians over the age of 60 are food insecure, representing a 21 percent increase in the last fifteen years.[24] 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.[25] [26] [27] [28] [29] Given these harmful trends, it is critical that we maintain access and benefit levels within 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.[30] Rents are already high, but continue to increase.[31] Out-of-pocket health care costs are also going up.[32]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.[33] 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.[34] White Americans have the lowest rates of food insecurity followed by other ethnic minorities, Latinx, and Black Americans.[35] 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.[36] [37] [38] 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

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participation among older adults.[39] Given the fact that SNAP is proven to reduce food insecurity, the Department should be working to reduce, not increase, the burden for older adults applying and enrolling in SNAP.

The Proposed Rule Will Disproportionately Harm Households in Rural Areas
California's rural areas have disproportionately high utility costs,[40] and have, on average, larger household sizes than other areas of the state.[41] Cutting SNAP will not only disproportionately harm low-income households in rural areas, decreased federal funding will reduce state and local fiscal health and exacerbate public funding shortfalls in many rural California cities and counties. 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."[42] The Department provides no analysis of the impact of the proposed rule on low-income rural households, making it difficult for commenters to understand the full impact of the rule and provide informed comment.

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. The estimated reduction in SNAP benefit payments in California if the rule were enacted is about $54 million per year. According to USDA Economic Research Service, each $1 in federal SNAP benefits generates $1.79 in economic activity.[43] Therefore, a $54 million reduction of SNAP dollars would mean a loss of nearly $100 million in economic activity annually in our state.

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.[44] 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.[45] Further, by reducing economic activity in the agriculture, food retail, and shipping sectors, USDA would remove opportunities for entry-level employment among SNAP participants seeking jobs to improve their economic mobility.

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

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revenue for the state and local governments."[46] 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.[47]

Conclusion

USDA should be strengthening the positive impacts of SNAP for health, well-being and economic activity, not making cuts to SNAP benefits. The proposed rule is another attempt by the Administration to circumvent longstanding and recently affirmed Congressional intent with regard to SNAP spending and administrative guidance. The proposed rule also fails to account for multiple likely impacts on different regions, household income levels, and demographic groups—in particular older adults and people with disabilities. For these reasons, CFPA strongly opposes the proposed rule and requests that USDA withdraw the rule and work with states to improve their SUA's under existing flexibility.

Thank you again for the opportunity to provide comment on Notice of Proposed Rule Making Regarding Supplemental Nutrition Assistance Program (SNAP) Standardization of State Heating and Cooling Standard Utility Allowances -- RIN 0584-AE69. Should you have any questions about our comments, please do not hesitate to contact us at the email or phone number below.

Sincerely,

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[2] CFPA Factsheet, "Struggling to Make Ends Meet: Food Insecurity in CA," available at https://cfpa.net/GeneralNutrition/CFPAPublications/FoodInsecurity-Factsheet-2019.pdf

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[4] See CFPA's comments submitted to the Federal Register in response to: "Notice of Proposed Rulemaking -- Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP) RIN 0584-AE62 at https://cfpa.net/GeneralNutrition/FederalAdvocacy/CFPA-CatElComment-RIN%200584-AE62-9.23.19.pdf, and Proposed Rule: SNAP Requirements for Able-Bodied Adults Without Dependents, at https://cfpa.net/GeneralNutrition/FederalAdvocacy/CFPA-Comment_RIN%200584-AE57-FINAL.pdf

[5] 7 U.S.C. section 2011.

[6] USDA The Department Guidance 79-47, *"Food Stamp Program, Standard Utility Allowances Requirements and Methodologies,"* 1979.

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[8] Federal Register 52809 Vol. 84, No. 192 Thursday, October 3, 2019, available at https://www.govinfo.gov/content/pkg/FR-2019-10-03/pdf/2019-21287.pdf

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