[Date]

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 Rule Making -- Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP) RIN 0584-AE62

Dear SNAP Program Design Branch:

On behalf of [fill in organization if applicable] I/we appreciate the opportunity to comment on USDA’s Notice of Proposed Rule Making on a Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP). In addition to its harmful impacts on health and well-being, the proposed changes would undermine the effectiveness of SNAP in stimulating the economy, particularly during recessionary times. The proposed rule should be withdrawn.

[FILL IN INFORMATION ABOUT YOU, your city or your organization’s mission].  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_.

SNAP plays a critical role in addressing hunger and food insecurity in our community. It is the first line of defense against hunger for low-income residents.

[Insert information about food insecurity in the state and/or city.  Insert information about the positive impacts that SNAP has for health and well-being and for economic activity for local communities—see, e.g., information contained in <http://frac.org/wp-content/uploads/frac-facts-snap-strengths.pdf>]

The proposed rule would greatly reduce states’ flexibility under the Broad-based Categorical Eligibility (“Cat El”) option. [https://fns-prod.azureedge.net/sites/default/files/snap/BBCE.pdf](https://nam01.safelinks.protection.outlook.com/?url=https%3A%2F%2Ffns-prod.azureedge.net%2Fsites%2Fdefault%2Ffiles%2Fsnap%2FBBCE.pdf&data=02%7C01%7Ccmalonesmolla%40feedingamerica.org%7C6e379247b0d8436e65ef08d70f93db51%7Cb1f9e34f11214c708f88aff49a1ef321%7C0%7C1%7C636995000027373141&sdata=4Z%2F68fUpDxOHyTllYm%2FTaHKUwoBBfX7ciIR3uS%2FKM8c%3D&reserved=0) It would gut states’ ability to eliminate SNAP asset tests and use a higher income test to serve more working households that have significant expenses for other basic needs, such as shelter and child care.  In doing so, it will produce a “cliff effect” that abruptly takes food support away from low-income families who are working their way up the economic ladder and get a raise or take a new job with slightly higher pay.

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 meager savings. By USDA’s own estimates, the proposed rule would cut SNAP benefits over five years by $10.543 billion, while increasing SNAP administrative costs by $2.314 billion.

The cuts to SNAP benefits will reduce the economic stimulative effect of SNAP, particularly during recessionary periods. 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. Economists find SNAP to be one of the stimulus policies with among the highest “bangs for the buck.” [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)]

USDA’s Economic Research Service has reported that new SNAP spending has relatively large effects on manufacturing and trade and transportation sectors. Those sectors include businesses, such as food and beverage manufacturers, packaging manufacturers, grocery stores and food and other wholesalers, and trucking and rail freight industries. [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> page 24]. But other sectors are impacted as well, including health and social services and agriculture. [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> page 25]

SNAP’s economic positive impacts are felt not only by businesses. SNAP dollars help many food retailers operating on thin margins to remain in business, which improves food access for all residents.

[Local farmers’ markets receive revenue from SNAP purchases and many of those markets also participate in incentive programs that provide SNAP shoppers with bonuses for purchasing fruits and vegetables.][Insert examples of food access in your communities]

Congress has repeatedly rejected efforts to gut the Cat El option, including as recently as the 2018 Farm Bill enacted last December.  This USDA rulemaking is an attempt to side step Congress and is outside USDA’s authority.

USDA should be strengthening the positive impacts of SNAP for health, well-being and economic activity, not eliminating eligibility for 3.1 million and slashing SNAP benefit spending. We strongly oppose the proposed rule and request it be withdrawn.

[I/We] strongly oppose the proposed rule that would cut SNAP food benefits, exacerbate food insecurity, and undermine the positive economic impacts that SNAP has for our community and our nation.

Sincerely,