[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). The proposed changes would cause serious harm to [fill in population group or sector], our community and the nation. The proposed rule should be withdrawn.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 gut states’ options to eliminate SNAP asset tests and use a higher 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 El”). [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)

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. 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.”

Cat El policies have been in place for more than two decades.  Congress rejected efforts to gut Cat El, including during its consideration of 2005 budget reconciliation and the 2018 Farm Bill.  This USDA rulemaking is an attempt to side step Congress and is outside USDA’s authority.

[I/We] strongly oppose the proposed rule that would cut food benefits for struggling people and harm our community.

Sincerely,