



## THE UNITED STATES CONFERENCE OF MAYORS

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August 21, 2019

Ms. Jessica Shahin  
Associate Administrator, Supplemental Nutrition Assistance Program  
Program Design Branch, Program Development Division  
Food and Nutrition Service, USDA  
3101 Park Center Dr.  
Alexandria, VA 22302

Dear Associate Administrator Shahin:

On behalf of the US Conference of Mayors (USCM), we are writing to express our strong opposition to the proposed revision of "broad based categorical eligibility" in USDA's Supplemental Nutrition Assistance Program (SNAP) published in the Federal Register on July 23, 2019. As noted in the proposal's regulatory analysis, this far reaching executive action will escalate food insecurity and hunger for an estimated 3.1 million individuals - including children, seniors, and people with disabilities in our states, regions and cities nationwide. Furthermore, this proposal will put children's health and development at risk by removing their access to healthy school meals; and harm our economy by reducing the amount of SNAP dollars available to spur regional and local economic activity.

As Mayors, we serve as the CEOs of the nation's cities; and remain most concerned about any proposal that will reduce improvements to the health of our residents, weaken nutrition programs, deteriorate advances to healthy food access, and spur declines in local and regional economies. USCM has supported and adopted policies over many years to eliminate hunger, combat food insecurity and improve health disparities to build a stronger society for all residents in our communities. Equally, we have vigorously opposed the proposed revision of broad based categorical eligibility of USDA's Supplemental Nutrition Assistance Program and rejected this proposal most recently throughout deliberation of the Farm Bill in 2018.

SNAP remains one of our nations' key resources in the fight against hunger and is particularly important to vulnerable populations in our cities. For instance, 80 percent of SNAP households include a child, an elderly person, or a person with disabilities; and 85 percent of all SNAP benefits go to such households. Furthermore, SNAP is not only a critical resource in the fight against hunger and food insecurity, but also lifts people out of poverty. Per the 2017

Supplemental Poverty Measure Report, SNAP lifted 3.4 million people – including 1.5 million children out of poverty in 2017. So, we stand united and reject any proposal to restrict eligibility to vulnerable adults, children, seniors, and people with disabilities in our cities.

Research has found that receipt of SNAP in early childhood improved high school graduation rates, adult earnings, and adult health. Mayors recognize that solving child hunger and poverty is critically important to also creating a future where all children thrive. Regular access to healthy and affordable meals is one of the strongest predictors of improved school performance, better health, and sound childhood development.

Lastly, the proposed rule will harm local and regional economies, as it is well documented that the economic gains from public benefits are even greater than the volume of direct assistance due to a "multiplier" effect. USDA has estimated that during times of economic downturn, every additional \$5 dollars in SNAP benefits generates up to \$9 dollars of economic activity, and every \$1 billion increase in SNAP benefits results in 8,900 full-time equivalent jobs.

Executive action should not be used to hurt individuals, families and communities; and we urge you to abandon this proposal. Our nation cannot remain globally competitive if our children do not have enough to eat; if our citizens do not have access to affordable health care; if housing and other basic needs are priced out of reach; and if adults who are willing and able to work cannot find jobs that will help them support their families.

Sincerely,

Levar Stoney  
Mayor of Richmond, VA  
Chair, Children, Health, and  
Human Services Standing  
Committee

Muriel Bowser  
Mayor of Washington, DC  
Co-Chair, Food Policy Task  
Force

Bernard "Jack" Young  
Mayor of Baltimore, MD  
Co-Chair, Food Policy Task  
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Mayor of South Bend, IN

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Mayor of South Fulton, GA

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Mayor of Stockton, CA

Victoria Woodards  
Mayor of Tacoma, WA

Mark W. Mitchell  
Mayor of Tempe, AZ

Michelle De La Isla  
Mayor of Topeka, KS

Jonathan Rothschild  
Mayor of Tucson, AZ

Carol Dutra-Vernaci  
Mayor of Union City, CA

Thomas M. Roach  
Mayor of White Plains, NY

Cc: The Honorable Sonny Perdue, Secretary, U.S. Department of Agriculture  
The Honorable Alex Azar, Secretary, U.S. Department of Health and Human Services  
The Honorable Richard Neal, Chair, Committee on Ways and Means, U.S. House of Representatives  
The Honorable Kevin Brady, Ranking Member, Committee on Ways and Means, U.S. House of Representatives  
The Honorable Bobby Scott, Chair, Committee on Education and Labor, U.S. House of Representatives  
The Honorable Virginia Foxx, Ranking Member, Committee on Education and Labor, U.S. House of Representatives  
The Honorable Colin Peterson, Chair, Committee on Agriculture, U.S. House of Representatives  
The Honorable Mike Conaway, Ranking Member, Committee on Agriculture, U.S. House of Representatives  
The Honorable Pat Roberts, Chair, Committee on Agriculture, Nutrition, and Forestry, U.S. Senate  
The Honorable Debbie Stabenow, Ranking Member, Committee on Agriculture, Nutrition, and Forestry, U.S. Senate