[Date]

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

Submitted via Regulations.gov

Dear SNAP Certification Policy Branch:

On behalf of [fill in organization if applicable] I/we appreciate the opportunity to comment on USDA’s Notice of Proposed Rule regarding Supplemental Assistance Nutrition Program (SNAP) Standardization of State Heating and Cooling Standard Utility Allowances. [Link] According to the Department’s own estimates, the proposed rule would cut SNAP benefits by $4.5 billion over five years.

The proposed rule would exacerbate the struggles many low-income people have paying for costs of both food and utilities. It would have harmful impacts on health and well-being as well as on the economy. The proposed rule is flawed and should be withdrawn.

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

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.”[[1]](#footnote-1)

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>]

SNAP benefits respond quickly and effectively to changes in need, whether due to economic downturns or natural disasters. 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. [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)]

Policymakers recognize that household resources needed to pay for basics such as shelter, utility costs and childcare are not available to purchase food. Under current law, SNAP takes into account the utility expenses of each SNAP household. States adjust household benefits based on a state-specific Standard Utility Allowance (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 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 and what the results of those estimates were. The lack of such explanation is particularly concerning given research documented that 21 states had SUAs exceeding the 85th percentile estimates, possibly because in their efforts to mitigate benefit loss for households with very high utility costs.

The Administration concedes that the proposed rule would cause 19 percent of SNAP households to get lower SNAP monthly benefits, would disproportionately impact elderly people and people with disabilities, and would cause a national net cut to SNAP benefits amounting to $4.5 billion over five years.

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 included a request for a change similar to the proposed rule [<https://www.obpa.usda.gov/32fns2019notes.pdf>], 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 SNAP’s statutory purpose, but instead undermines its statutory purpose.

USDA should be strengthening the positive impacts of SNAP for health, well-being and economic activity, not making cuts to SNAP benefits. [I/We] strongly oppose the proposed rule and request the USDA withdraw the rule and work with states to improve their SUA’s under existing flexibility.

Sincerely,

1. 7 U.S.C. section 2011. [↑](#footnote-ref-1)