[Date]

SNAP Certification Policy 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 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 The proposed rule is flawed and should be withdrawn.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 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. Data are available via <https://frac.org/research/resource-library/household-food-insecurity-rates-rurality-state-2015-2017>

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> and <https://frac.org/research/resource-library/snap-public-health-role-supplemental-nutrition-assistance-program-improving-health-well%e2%80%90being-americans> ]

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.

The food security and health implications of the proposed rule are serious and disturbing. Food insecurity has direct and indirect impacts on physical and mental health for people of all ages. Food insecurity — and even marginal food security (a less severe level of food insecurity)— is especially detrimental to the health, development, and well-being of infants, children, and adolescents. [More information available from “The Impact of Poverty, Food Insecurity, and Poor Nutrition on Health and Well-Being,” available via <https://frac.org/research/resource-library/hunger-health-impact-poverty-food-insecurity-poor-nutrition-health-well>].

SNAP plays a critical role in improving the food security, health, and well-being of program participants across the lifespan. Conversely, research shows that a loss or reduction in SNAP benefits has detrimental impacts on food insecurity and health, especially for children and their families. [Helpful background and information is available from Children’s Health Watch at <https://childrenshealthwatch.org/> E.g., Ettinger de Cuba, S., Harker, L., Weiss, I., Scully, K., Chilton, M., & Coleman, S. (2013), “Punishing Hard Work: The Unintended Consequences of Cutting SNAP Benefits,” Boston, MA: Children’s HealthWatch, available at <https://childrenshealthwatch.org/wp-content/uploads/cliffeffect_report_dec2013.pdf>; Bovell, A., Ettinger de Cuba, S., Scully, K., Chilton, M., & Coleman, S. (2014), “Making SNAP Work for Families Leaving Poverty. Series – Hunger: A New Vital Sign,” Boston, MA: Children’s HealthWatch, available at <https://childrenshealthwatch.org/wp-content/uploads/FINALPhilly-Food-to-web3.pdf>; and Bovell, A., Ettinger de Cuba,S., Frank, D., “SNAP: Building a Healthy Foundation Today and Tomorrow,” June 22, 2018, available at <https://childrenshealthwatch.org/snap-building-a-healthy-foundation-today-and-tomorrow/>]

Older adults and people with disabilities will be disparately impacted by the proposed rule. SNAP plays an important role in supporting the food security, nutrition, and health of older adults, allowing them to maintain their independence while also reducing their health care utilization and costs. People with disabilities are at higher risk of food insecurity, making SNAP a critical support for this vulnerable population as well.

Furthermore, those impacted by food insecurity are likely experiencing additional resource-related hardships, such as housing instability and energy insecurity. An emerging body of evidence demonstrates that SNAP supports housing stability and alleviate the trade-offs that families often are forced to make between food, health care, and other basic necessities.

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.

[I/We] strongly oppose the proposed rule that would cut food benefits for struggling people and undermine health in our community and across our nation.

Sincerely,