

PROPOSED SNAP RULE WILL OVERWHELMINGLY HARM CHILDREN AND THEIR FAMILY MEMBERS

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The Trump Administration recently proposed a rule that, if implemented, would make it harder for low-income families to put food on the table. The proposal, Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program¹, seeks changes to state eligibility options for the Supplemental Nutrition Assistance Program (SNAP) would kick 3.1 million Americans off of food assistance—including 1.9 million children and their family members. Below, find details about this harmful proposal and its disproportionate impact on children and those who live with them.

THE IMPORTANCE OF SNAP FOR CHILDREN

As the nation's largest federal food assistance program, the Supplemental Nutrition Assistance Program (SNAP) is the first line of defense against child food insecurity.² SNAP works efficiently and effectively by providing individuals in low income households—including more than 18 million children—with monthly funds specifically designated for food purchases. SNAP's proven, positive impact on children includes better health, educational, and nutritional outcomes—not to mention fighting poverty. Without this critical program, 1.5 million additional children would have lived under the federal poverty line in 2017.³ A recent landmark study by the National Academies of Sciences and Engineering confirms that SNAP is “of central importance for reducing child poverty” and that increasing the scope and size of SNAP benefits would reduce child poverty even further.⁴

Unfortunately, rather than invest in SNAP, the Trump Administration is proposing to cut benefits by \$10.5 billion over a decade by reducing state options for Broad Based Categorical Eligibility (BBCE). BBCE is an essential tool that reduces bureaucracy and red tape

so that states can more easily connect eligible poor and low-income households with food assistance. With BBCE, states can streamline SNAP eligibility for families who are receiving a noncash benefit funded through Temporary Assistance for Needy Families (TANF). BBCE allows states to cut red tape, waive counterproductive asset limits for SNAP eligibility, and relax income thresholds so that families do not face a benefit cliff when their earnings exceed 130 percent (but no more than 200

\$10.5 Billion *proposed cut to SNAP benefits over 10 years*

¹ Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP), 84 FR 35570 (proposed July 24th 2019), to be codified at 7 CFR part 273, 35575

² James Mabli, Jim Ohls, Lisa Dragoset, Laura Castner, and Betsy Santos, “Measuring the Effect of Supplemental Nutrition Assistance Program (SNAP) Participation on Food Security,” U.S. Department of Agriculture Food and Nutrition Service, August 2013, 28.

³ Liana Fox, “The Supplemental Poverty Measure: 2017,” U.S. Census Bureau, September 2018, Appendix Table A-6

⁴ National Academies of Sciences, “A Roadmap to Reducing Child Poverty,” National Academies Press, February 2018, 5-18.

percent) of the federal poverty line. Children who qualify for SNAP thanks to BBCE also receive direct certification for free school meals, saving their families the cost paying the reduced or full price at a time when school meals remain unaffordable for many.⁵

THE PROPOSED RULE WILL DISPROPORTIONATELY TARGET CHILDREN AND THEIR FAMILY MEMBERS

Gutting options for BBCE will disproportionately harm millions of low-income, food insecure children who benefit from SNAP. USDA acknowledges that 7.4 percent of SNAP households with children will lose access to SNAP because they no longer meet the narrowed income and/or asset requirements.⁶ This means that an estimated 1.2 million children and 700,000 adults living with them will longer have access to SNAP benefits. These 1.9 million people in households with children represent 61 percent of the individuals who will lose benefits.⁷ Beyond their disproportionate loss of SNAP benefits, children and the individuals living with them will experience additional harm under the proposed rule. It will:

1.9 Million *children and their family members will lose SNAP benefits under the proposal*

- **Impose Unnecessary Bureaucracy on Families with Children:** Under BBCE, states and families save time and administrative burden so that families do not have to perform duplicative application processes. USDA acknowledges that the majority of SNAP households will remain income and asset eligible for the program, meaning they will simply face a new, unnecessary obstacle in accessing the program. This is especially burdensome for families juggling busy work schedules or who face language or transportation barriers.
- **Punish Families for Earnings Gains:** In 2018, Nearly 70 percent of families with children with a gross income of less than 200 percent of the poverty line experienced a range of material hardship, including an inability to provide food for their families, missed rent or mortgage payments, loss of housing, inability to pay medical bills or unmet medical needs due to costs.⁸ Increased income thresholds under BBCE mean these families can continue to make ends meet in the face of high housing, child care, or medical expenses, rather than experiencing a net loss of income upon falling over the SNAP “benefit cliff.”⁹
- **Penalize Families for Building Savings:** Today, 63 percent of US children live in asset poverty—meaning their families could not afford to stay afloat after losing income for three

⁵ Rachel Merker, “Stories of ‘Lunch Shaming’ Highlight Need for Free School Meals,” First Focus on Children, May 24 2019

⁶ Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP), 84 FR 35570 (proposed July 24th 2019), to be codified at 7 CFR part 273, 35575

⁷ Estimate based on Regulatory Impact Analysis supplement to Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program, (see footnote 1), Table 4. Administration estimates assume 2020 caseload will represent roughly 87 percent of 2016 caseload.

⁸ Michael Karpman, Dulce Gonzalez, Stephen Zuckerman, and Gina Adams, “What Explains the Widespread Material Hardship among Low-Income Families with Children?” The Urban Institute, December 20, 2018

⁹ Elizabeth Wolkomir and Lexin Cai, “The Supplemental Nutrition Assistance Program Includes Earnings Incentives,” Center on Budget and Policy Priorities, June 5, 2019

months.¹⁰ BBCE helps families with children build savings by giving states the option to waive burdensome and counterproductive asset testing, which penalizes low-income families for trying to build up the resources they need for economic self-sufficiency.¹¹ USDA admits that “the proposed rule may also...reduce the savings rates among those individuals who do not meet the income and resource eligibility requirements for SNAP.”¹²

- **Disrupt Pathways to Other Child Nutrition Programs:** School-aged children who lose SNAP benefits under this proposed rule will also lose direct certification for free school meals unless they fall into another group that is categorically eligible. As a result, an estimated 500,000 children may lose free school meals.¹³ Additionally, the rule might threaten eligibility or create additional barriers to access for the Special Supplemental Nutrition Program for Women, Infants and Children (WIC), as 33 percent of WIC participants are adjunctively eligible through SNAP participation.¹⁴

500 Thousand children are in jeopardy of losing free school meals under the proposal

TAKE ACTION TO PROTECT SNAP FOR KIDS

Given its overwhelming harm to children’s food security, income, and wellbeing, First Focus on Children opposes this proposed rule and urges the administration to withdraw it. However, it is critical for other children’s advocates to submit comments in opposition to this counterproductive rule. Comments in response to the rule can be submitted until Monday, September 23rd, 2019. We encourage partners to submit comments using the [USDA SNAP Rule Opposition toolkit: http://bit.ly/SNAPRuleCampaign2](http://bit.ly/SNAPRuleCampaign2).

For questions and more information, please contact Rachel Merker, Director of Policy and Research at First Focus on Children, rachelm@firstfocus.org.

¹⁰ David W. Rothwell, Timothy Ottusch and Jennifer K. Finders, “Asset poverty among children: A cross-national study of poverty risk,” *Children and Youth Sciences Review*, Volume 96 (January 2019): 409-419.

¹¹ Caroline Ratcliffe Signe-Mary McKernan, Laura Wheaton, and Emma Cancian Kalish. “The Unintended Consequences of SNAP Asset Limits,” *The Urban Institute*, July 2016

¹² *Ibid.* at 1

¹³ Representative Bobby Scott, “Chairman Scott to Secretary Perdue: Release Internal Estimates Showing Impact of Proposed SNAP Changes on Free School Meals,” *United States House of Representatives Committee on Education and Labor*, July 2019

¹⁴ Betsy Thom, et al, “WIC Participant and Program Characteristics 2016,” *U.S. Department of Agriculture Food and Nutrition Service*, April 2018, Table 3.1