Thank you for taking the time to submit a comment to USDA’s Food and Nutrition Service (FNS) during the re-opened comment period for proposed changes to categorical eligibility in SNAP. **Please customize the template** below to create a unique comment emphasizing the harm this rule will have on children and their families. [**Comments on the updated analysis must be submitted here by November 1, 2019**](https://www.federalregister.gov/documents/2019/10/18/2019-22783/revision-of-categorical-eligibility-in-the-supplemental-nutrition-assistance-program-snap-reopening)

The proposed rule would essentially eliminate Broad Based Categorical Eligibility (BBCE), a state option that allows states to streamline SNAP eligibility for families who are receiving a noncash benefit funded through Temporary Assistance for Needy Families (TANF). Along with cutting red tape so that families do not have complete duplicative application processes for multiple benefit programs, BBCE allows states to waive counterproductive asset limits for SNAP eligibility and relax income thresholds so that low-income families do not face a benefit cliff when their earnings exceed 130 percent (but no more than 200 percent) of the federal poverty line. **To learn more about the importance of BBCE for children,** [**you can visit this fact sheet by First Focus on Children.**](https://firstfocus.org/resources/fact-sheet/fact-sheet-proposed-snap-rule-will-overwhelmingly-harm-children-and-their-family-members)

Email rachelm@firstfocus.org with any questions.

**TEMPLATE**

[DATE]

Program Design Branch

Program Development Division

Food and Nutrition Service, USDA

3101 Park Center Drive

Alexandria, Virginia 22302

RE:  Proposed Rule: Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP) RIN 0584-AE62

Dear program design branch,

Thank you for the opportunity to comment in opposition to the US Department of Agriculture (USDA)’s Proposed Rule on Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP.) [[1]](#footnote-1) **[Describe yourself/your organization and why you/the children’s community you serve have a vested interest in this rule.]**

The proposed rule to limit state options for Broad Based Categorical Eligibility (BBCE) will cause children and their families to lose access to vital food assistance, jeopardizing their food security and economic stability. We urge you to withdraw this harmful proposal.

**SNAP Fights Child Food Insecurity and Child Poverty**

As the nation’s largest federal food assistance program, the SNAP works efficiently and effectively by providing low-income households with monthly funds specifically designated for food purchases, and benefited 18 million children in 2016.[[2]](#footnote-2) Households with children represent nearly 68 percent of total SNAP participants.[[3]](#footnote-3) **[Include** [**state**](https://www.frac.org/maps/snap-state-map/snap-states.html) **and** [**demographic**](https://www.cbpp.org/research/food-assistance/snap-helps-millions-of-children) **data for households with children on SNAP]**

SNAP is the first line of defense against child food insecurity. **Insert information about importance of SNAP in** [**reducing child food insecurity**](https://www.fns.usda.gov/measuring-effect-snap-participation-food-security-0) **and providing other** [**long-term benefits and improvements in children’s health, nutrition, education and future earnings**](https://obamawhitehouse.archives.gov/sites/obamawhitehouse.archives.gov/files/documents/SNAP_report_final_nonembargo.pdf)**.]**

Losing SNAP would be especially devastating for children, who are uniquely vulnerable to the harm of food insecurity. **[Talk about the existing threat of child food insecurity in the US and how a loss in SNAP benefits would make it worse in your** [**state**](https://www.feedingamerica.org/sites/default/files/research/map-the-meal-gap/2016/2016-map-the-meal-gap-child-food-insecurity.pdf) **and among the specific population of children/child well-being you represent, i.e.** [**health**](https://pediatrics.aappublications.org/content/136/5/e1431)**,** [**mental health**](https://www.apa.org/advocacy/socioeconomic-status/hunger.pdf)**,** [**education**](https://academic.oup.com/jn/article/135/12/2831/4669915)**,** [**young children**](https://www.urban.org/sites/default/files/publication/100376/wellness_check_food_insecurity_among_families_with_infants_and_toddlers_3.pdf)**,** [**children of immigrants**](https://www.childtrends.org/wp-content/uploads/2009/02/Immigrant-Food-Security.pdf)**,** [**children of color**](https://childrenshealthwatch.org/the-impact-of-food-insecurity-on-the-development-of-young-low-income-black-and-latino-children-protecting-the-health-and-nutrition-of-young-children-of-color-the-impact-of-nutrition-assistance-and/)**,** [**children in working families**](https://childrenshealthwatch.org/us-families-with-reduction-and-loss-of-snap-benefits-have-a-higher-risk-of-food-insecurity-and-poor-health/)**,** [**teenagers**](https://www.urban.org/research/publication/impossible-choices-teens-and-food-insecurity-america)**,** [**runaway and homeless youth**](https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2575688/)**,** [**children with disabilities**](https://www.cbpp.org/blog/young-people-with-disabilities-vulnerable-to-food-insecurity)**,** [**WIC participants**](https://s3.amazonaws.com/aws.upl/nwica.org/teaming-up-to-improve-the-health-of-women-and-children.pdf)**,** [**children in the care of grandparents**](https://altarum.org/sites/default/files/uploaded-publication-files/Altarum-Research-Brief-Collateral-Damage-of-the-Opioid-Crisis-Dec1218.pdf)**.].]**

Beyond its role in fighting food insecurity, SNAP significantly reduces child poverty, breaking the cycle of generational poverty as it helps struggling families make ends meet. Without SNAP, 1.5 million additional children (11.3 percent) would have lived under the poverty line in 2017 alone.[[4]](#footnote-4) **[Talk about the fact that children are** [**disproportionately likely to experience poverty and low-income**](https://firstfocus.org/resources/fact-sheet/fact-sheet-a-snapshot-of-children-living-in-poverty-2017) **and the** [**role SNAP plays in alleviating it**](https://firstfocus.org/blog/despite-strong-economy-census-data-shows-that-child-poverty-remains-high)**. Include details about the risk/prevalence of poverty and low-income for** [**young children**](https://www.zerotothree.org/resources/516-poverty-s-effect-on-infants-and-toddlers-infographic)**,** [**children of immigrants**](http://www.nccp.org/topics/immigrantfamilies.html)**,** [**children of color**](https://www.childtrends.org/in-33-states-hispanic-or-black-children-are-more-than-twice-as-likely-to-be-in-poverty-than-their-white-peers)**,** [**children in low-wage working families**](https://politicsofpoverty.oxfamamerica.org/2015/04/how-low-wages-hurt-families-and-perpetuate-poverty/)**,** [**child neglect/maltreatment**](https://www.sciencedirect.com/science/article/pii/S0190740916303139)**,** [**children in the care of grandparents**](https://www.gu.org/app/uploads/2018/05/Grandfamilies-Report-SOGF-2017.pdf)**,** etc. **You can also** [**point to the recent landmark study on child poverty reduction**](http://sites.nationalacademies.org/dbasse/bcyf/reducing_child_poverty/index.htm) **by the National Academies of Science, Engineering and Medicine, which confirms that SNAP is critically important to fighting child poverty.]**

**The Proposed Rule Will Disproportionately Harm Children and their Families**

In its Regulatory Impact Analysis (RIA) of the proposed rule, USDA acknowledges that gutting BBCE will result in 7.4 percent of SNAP households children with children losing access to SNAP because they no longer meet its narrow income or asset requirements.[[5]](#footnote-5) This means that an estimated 1.9 million children and the adults they live with will no longer have access to SNAP benefits, representing 61 percent of the projected 3.1 million people who USDA will lose their SNAP benefits.[[6]](#footnote-6) Unsurprisingly, the agency admits that the proposed rule’s cuts to SNAP will harm food security.[[7]](#footnote-7) The proposed rule will do further harm to families with children by:

***Disrupting Pathways to Other Child Nutrition Programs:*** 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.[[8]](#footnote-8)  **USDA now acknowledges that liminating BBCE will jeopardize more than 1 million children’s access to free school meals.[[9]](#footnote-9)** [**Talk about the important** [**complementary roles of SNAP and school meals**](https://www.ers.usda.gov/webdocs/publications/84003/eib-174.pdf) **in fighting child food insecurity, the** [**positive impact that SNAP has on reducing barriers to participation in school meals.**](https://www.povertylaw.org/clearinghouse/articles/meals)**, and the** [**antipoverty effect of school meals programs**](https://firstfocus.org/blog/despite-strong-economy-census-data-shows-that-child-poverty-remains-high)**.]** Additionally, 33 percent of the participants in the Special Supplemental Nutrition Program for Women, Infants and Children (WIC) are adjunctively eligible for the program thanks to their participation in SNAP.[[10]](#footnote-10) USDA does not provide an estimate for how the loss of SNAP under the proposed rule might also impact participation in WIC, . **[Insert language about the positive impact that SNAP has on reducing barriers to participation in** [**WIC**](https://www.frac.org/wp-content/uploads/Making-WIC-Work-Better-Full-Report.pdfhttps%3A/www.frac.org/wp-content/uploads/Making-WIC-Work-Better-Full-Report.pdf)**]**

***Imposing Unnecessary Bureaucracy:*** 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. **[Insert language about how this benefits families with children you work with or represent, i.e. with busy work schedules, language or transportation barriers]**

***Punishing 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.[[11]](#footnote-11) **[Insert details about how waiving the income thresholds under BBCE benefits these families by** [**removing the SNAP benefit cliff**](https://www.cbpp.org/research/food-assistance/the-supplemental-nutrition-assistance-program-includes-earnings-incentives)**, especially for those who live in high cost areas or spend most of their income on housing, child care, or medical expenses:** [**see testimony from Share Our Strength for examples of household budget constraints**](https://agriculture.house.gov/uploadedfiles/hhrg-116-ag03-wstate-lisadavisl-20190620.pdf)**.]**

***Penalizing 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 months.[[12]](#footnote-12) 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. 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.”[[13]](#footnote-13)  **[Insert details about how** [**asset testing in SNAP is counterproductive**](https://www.urban.org/research/publication/unintended-consequences-snap-asset-limits) **and how options for BBCE help families save for the future, interact with mainstream financial institutions, and weather emergency economic shocks.]**

**Conclusion**

Given its overwhelming harm to children’s food security, income, and wellbeing, [I/We] oppose this proposed rule and urge the administration to withdraw it.

Sincerely,

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 [↑](#footnote-ref-1)
2. Kathryn Conquist and Sarah Lauffer, “Characteristics of Supplemental Nutrition Assistance Program Households: Fiscal Year 2017,” U.S. Department of Agriculture Food and Nutrition Service,February 2019, Table 3.3 [↑](#footnote-ref-2)
3. Ibid, Table 3.5 [↑](#footnote-ref-3)
4. Liana Fox, “The Supplemental Poverty Measure: 2017,” U.S. Census Bureau*,* September 2018,Appendix Table A-6 [↑](#footnote-ref-4)
5. Ibid. at footnote 1, 35575 [↑](#footnote-ref-5)
6. 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. [↑](#footnote-ref-6)
7. Ibid. at footnote 8 [↑](#footnote-ref-7)
8. Rachel Merker, “Stories of ‘Lunch Shaming’ Highlight Need for Free School Meals,” First Focus on Children, May 24 2019 [↑](#footnote-ref-8)
9. Updated Regulatory Impact Analysis supplement to Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program—Potential Impact on Participants in the National School Lunch Program and School Breakfast Program [↑](#footnote-ref-9)
10. Betsy Thorn, et al, “WIC Participant and Program Characteristics 2016,” U.S. Department of Agriculture Food and Nutrition Service, April 2018, Table 3.1 [↑](#footnote-ref-10)
11. 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 [↑](#footnote-ref-11)
12. 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. [↑](#footnote-ref-12)
13. Ibid. at footnote 8 [↑](#footnote-ref-13)