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October 23rd, 2019

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

Dear SNAP Certification Policy Branch,

Thank you for the opportunity to comment in opposition to the US Department of Agriculture (USDA)'s Proposed Rule on Standardization of State Heating and Cooling Standard Utility Allowances in the Supplemental Nutrition Assistance Program (SNAP.)¹

As a bipartisan advocacy organization dedicated to making children and families the priority in federal policy decisions, First Focus on Children understands the vital role that the Supplemental Nutrition Assistance Program (SNAP) plays in fighting child food insecurity and child poverty. At a time when US children experience both poverty and food insecurity at higher rates than adults, it is of utmost concern to our organization that SNAP continue to provide households with low-income, food-insecure children with enough resources to keep food on the table.

Unfortunately, the proposed rule would result in a net reduction in SNAP benefits for households with children as nearly 20 percent of these families would face an average annual loss of \$336 in food assistance.² Research suggests the existing SNAP formula is already inadequate for families with children, who often exhaust this modest support before the end of the month.³ If implemented, the proposed rule would worsen this problem and have devastating long-term consequences for children, and we urge you to withdraw it.

The Proposed Rule Will Increase Child Food Insecurity

¹ Supplemental Nutrition Assistance Program (SNAP) Standardization of State Heating and Cooling Standard Utility Allowances, 84 FR 52809 (proposed October 3rd, 2019), to be codified at 7 CFR part 273.

² Regulatory Impact Analysis supplement to Standardization of State Heating and Cooling Standard Utility Allowances (see footnote 1), 29

³National Academies of Sciences, Medicine, and Engineering, *A Roadmap to Reducing Child Poverty*, 2019, 144

Food insecurity remains a major threat to health and wellbeing of 11.2 million children in America.⁴ This means that in 2018, nearly one in seven children lived in a household that had uncertain access to enough healthy food. Food insecurity has devastating consequences for children and hinders the nation with long-term economic costs.⁵ Without access to healthy food, children suffer negative consequences to their health, education, and development. Because food insecurity typically results from inadequate household resources, it is especially prevalent in families living in or near poverty.⁶

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. In 2017, 18 million children utilized SNAP for access to consistent food, and 68 percent of all program participants lived in households with children.⁷ Beyond its role in fighting food insecurity, SNAP significantly reduces child poverty and helps struggling families make ends meet. SNAP benefits lifted nearly 1.4 million children out of poverty in 2018 alone, meaning that 13.7 percent more children would have lived below the poverty line (as defined by the Supplemental Poverty Measure) without the program.⁸

A recent landmark study by the National Academies of Science, Engineering and Medicine confirms that SNAP is “of central importance for reducing child poverty,” and calls SNAP “by far the single most important tax and transfer program for reducing deep poverty” in children. According to their report, increasing the scope and size of SNAP benefits for households with children would reduce child poverty and deep child poverty even further.⁹ In fact, current SNAP benefit amounts are often inadequate for participating families, 57 percent of whom report food insecurity and many of whom exhaust their benefits before the end of the month.¹⁰ Rather than address this shortcoming or invest in SNAP's potential to fight child poverty and hunger, the proposed rule will undermine the program's reach, cutting benefits by a net \$4.5 billion over 5 years.¹¹

Estimates suggest that under the proposed rule, 7 million people in 3 million households will experience a cut to their SNAP benefit cuts.¹² Roughly 68 percent of these individuals live in households with children;¹³ children and their family members are therefore the population most impacted by cuts under this proposal.

Today, 40 percent of U.S. children are either poor or low-income, meaning they live in households earning less than 200 percent of the federal poverty line.¹⁴ The Urban Institute finds that nearly 70 percent of families with a gross income of less than 200 percent of poverty experienced a range of material hardship, including an inability to provide food for their families, missed rent or mortgage

⁴ Alisha Coleman-Jensen, Matthew P. Rabbitt, Christian A. Gregory, and Anita Singh, “Household Food Insecurity in the United States in 2018,” U.S. Department of Agriculture, September 2018,

⁵ John Cook and Karen Jeng, “Child Food Insecurity: The Economic Impact on Our Nation,” Feeding America, 2009

⁶ Coleman Jensen et. al, “Household Food Insecurity in the United States in 2017,” Table 2

⁷ Kathryn Cronquist and Sarah Lauffer, “Characteristics of Supplemental Nutrition Assistance Program Households: Fiscal Year 2017,” United States Department of Agriculture, February 2019

⁸ Liana Fox, “The Supplemental Poverty Measure: 2018,” U.S. Census Bureau, October 2019

⁹ National Academies of Sciences, “A Roadmap to Reducing Child Poverty,” 5-18.

¹⁰ Ibid.

¹¹ Ibid. at footnote 1, 52812

¹² Estimate provided by the Center on Budget and Policy Priorities

¹³ Ibid.

¹⁴ Cara Baldari and Rachel Merker, “A Snapshot of Children Living in Poverty: 2017,” First Focus on Children, September 2018

payments, loss of housing, inability to pay medical bills or unmet medical needs due to costs.¹⁵ Given skyrocketing rents, the high cost of child care, and rising prices—combined with stagnant wages, it is no surprise that low-income families utilize SNAP benefits to supplement their household budgets. The SNAP SUA is a critical tool that allows States flexibility to ensure that low-income households who face high utility costs are not forced to choose between paying their energy bills and putting food on the table. By removing this flexibility, USDA will make it even harder for these households to make ends meet.

In 2018, SNAP was the third most effective assistance program (after refundable tax credits and Social Security) at keeping children from falling the below the poverty line.¹⁶ We are gravely concerned that cutting benefits will not only undermine the role SNAP plays in combatting food insecurity, but in fighting child poverty, as well.

As a cross-sector child advocacy organization concerned with the well-being of our nation’s children, First Focus on Children is alarmed and discouraged by the USDA proposal to standardize state SUAs in SNAP. SNAP is a critically important program that fights child food insecurity and child poverty, and this proposal will undermine its ability to do both. We urge you to withdraw this rule due to the serious harm it would do to children and their family members.

Sincerely,



Bruce Lesley
President

¹⁵ 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

¹⁶ Ibid. at footnote 8