[Date]

SNAP Program Design 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 -- Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP) RIN 0584-AE62**

Dear SNAP Program Design Branch:

On behalf of [fill in organization if applicable] I/we appreciate the opportunity to comment on USDA’s Notice of Proposed Rule Making on a Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP), known as CalFresh in California. The proposed changes would cause serious harm to [working families/children/seniors/people with disabilities/fill in population group or sector] in California, our community, and the nation. The proposed rule is misguided and should be withdrawn.

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

Across California, 4.7 million adults and 2.0 million children live in low-income households affected by food insecurity.[[1]](#footnote-1) Food insecurity means having limited, uncertain, or inconsistent access to the quality and quantity of food that is necessary to live a healthy life. Having sustained access to enough food is tied to positive social, physical, and mental health outcomes. SNAP/CalFresh plays a critical role in addressing hunger and food insecurity in our community. It is the first line of defense against hunger for over 3.8 million low-income Californians and 40 million Americans

[Insert information about food insecurity in your local community/city.

Insert information about the positive impacts that SNAP/CalFresh 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>]

The proposed rule would take us backward by removing states’ longstanding options to eliminate SNAP asset tests and use a higher income test to serve more working households that have significant expenses for shelter and child care. The current policy option is known as “Broad-Based Categorical Eligibility” (or “Cat El”). [https://fns-prod.azureedge.net/sites/default/files/snap/BBCE.pdf](https://nam01.safelinks.protection.outlook.com/?url=https%3A%2F%2Ffns-prod.azureedge.net%2Fsites%2Fdefault%2Ffiles%2Fsnap%2FBBCE.pdf&data=02%7C01%7Ccmalonesmolla%40feedingamerica.org%7C6e379247b0d8436e65ef08d70f93db51%7Cb1f9e34f11214c708f88aff49a1ef321%7C0%7C1%7C636995000027373141&sdata=4Z%2F68fUpDxOHyTllYm%2FTaHKUwoBBfX7ciIR3uS%2FKM8c%3D&reserved=0)

By removing the Cat El option, the proposed rule would eliminate SNAP benefits for 3.1 million individuals, take free school meals away from the children in those families, and punish people with even modest savings. By USDA’s own estimates, the proposed rule would cut SNAP benefits over five years by $10.5 billion, while counterproductively increasing SNAP administrative costs by $2.3 billion. Furthermore, USDA concedes, ”The proposed rule may also negatively impact food security and reduce the savings rates among those individuals who do not meet the income and resource eligibility requirements for SNAP or the substantial and ongoing requirements for expanded categorical eligibility**.”**

**In California, we estimate that 230,000 or more low-income Californians would lose access to CalFresh**. The vast majority of households losing vital food assistance will be working families or include seniors and people with disabilities.

Categorical eligibility is used to help low-wage working families, seniors, and people with disabilities with higher costs of living or modest savings qualify for help putting food on the table. Eliminating categorical eligibility would cause low-wage working families to lose help paying for food when they earn a little more take-home pay, disincentivizing them from working to get a higher wage job. It would also prevent families from moving towards economic security by cutting off help for those with modest financial savings.

The proposed rule would also cause harm to low-income K-12 students and the schools that serve them. Loss of SNAP benefits among households that receive SNAP through Cat El would sever the connection to free school meals for students in those households. While the original posted rule did not include an estimate of the number of students impacted, USDA subsequently issued an estimate that over 500,000 young students would be cut off from the free school meals. These meals are sometimes the only nutritious meal they eat each day, and which help students stay prepared and focused at school to achieve their academic goals.

Though USDA has provided insufficient information to fully comment on the impact on student meals, it is likely that tens of thousands of California students would lose access to free meals. This would also cause a ripple effect on school districts’ budgets under the state’s Local Control Funding Formula, which targets supplemental funding to high-need schools based partly on the percentage of students receiving free or reduced priced meals.

The cuts would also mean thousands of California K-12 schools that serve, or are planning to serve, universally-free meals under the Community Eligibility Provision could lose eligibility for the program or make it financially unsustainable. Universally free school meals are particularly important in California where the cost of living and operating a business are extraordinarily high. When breakfast and lunch are served free to every student, the entire school benefits from the elimination of school meal debt, the supportive meal environment that eliminates stigma, and the increase in federal resources that can be put back into the quality of the school meal programs.

Cat El policies have been in place for more than two decades. Congress rejected efforts to gut Cat El, including during its consideration of 2005 budget reconciliation and the 2018 Farm Bill.  This USDA rulemaking is another attempt to circumvent Congress and is outside USDA’s authority.

Cat El works in California. It helps families as they strive to get back on their feet. Financially responsible choices like establishing modest savings and owning a reliable car to get to and from work help Californians climb the economic ladder towards self-sufficiency. Cat El for CalFresh allows people to make those choices and still afford healthy food. It also increases administrative efficiency by streamlining enrollment into SNAP/CalFresh.

[I/We] strongly oppose the proposed rule that would cut food benefits for struggling people and harm our community, and strongly urge USDA to immediately withdraw this misguided proposal.

Sincerely,

Name/Title/Organization

1. CFPA Factsheet, “*Struggling to Make Ends Meet: Food Insecurity in CA,*” available at <https://cfpa.net/GeneralNutrition/CFPAPublications/FoodInsecurity-Factsheet-2019.pdf> [↑](#footnote-ref-1)