**Instructions**: Comments must be submitted by December 2, 2019. You can submit your comments through the federal register or use the Food Research and Action Center’s [online comment portal](http://bit.ly/SNAP-utilities). We ask that you modify the language you use in your comments to reflect your own thoughts and experiences so that each submitted comment counts as a unique comment. For other tips on creating effective comments click [here](https://www.regulations.gov/docs/Tips_For_Submitting_Effective_Comments.pdf).

[Date]

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:

On behalf of [insert your organization’s name, if applicable] I/we appreciate the opportunity to comment on USDA’s Notice of Proposed Rule Making, the “[Supplemental Nutrition Assistance Program: Standardization of State Heating and Cooling Standard Utility Allowances](https://www.regulations.gov/document?D=FNS-2019-0009-0001), which was published in the federal register on October 3, 2019.

I/we strongly oppose the changes proposed by USDA to alter the methodology for calculating standard utility allowances, because of the significant harm the change would inflict on California’s children. According to the Department’s own estimates, the proposed rule would lower monthly SNAP benefits for 20 percent of households with children and cause a national net cut to SNAP benefits, amounting to $4.5 billion over five years. These proposed cuts would exacerbate hunger and have harmful and lasting impacts on the health, educational achievement, and well-being of California’s children. [Insert a description about you, your city, your county, or your organization and explain why the proposed rule would uniquely impact the population of children you represent. Share the expertise you have on the issues raised within the proposed rule.] We believe the proposed rule is misguided and urge you to withdraw it.

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

Children need food to grow, to develop, and to be healthy, but two million California children live in low-income households that do not have access to enough food.[[1]](#footnote-1) [Alternatively/additionally, insert information about food insecurity in your county. See your county’s data at <https://cfpa.net/GeneralNutrition/CFPAPublications/FoodInsecurity-Factsheet-2019.pdf> SNAP plays a critical role in improving access to food for children in our community and across the state. As the nation’s largest federal food assistance program, SNAP works efficiently and effectively by providing low-income households with monthly funds specifically designated for food purchases, and benefited over 1.9 million California children in 2018.[[2]](#footnote-2) [Alternatively/additionally insert information about the number of children who benefited from SNAP in your county, see your county’s data at <https://www.cdss.ca.gov/inforesources/Data-Portal/Research-and-Data/CalFresh-Data-Dashboard>.] 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. SNAP lifted 3.2 million Americans out of poverty in 2018, according to the Census Bureau’s Supplemental Poverty Measure. Cuts to SNAP would have devastating effects for California’s children.

**The Proposed Rule Will Disproportionately Harm Households with Children**

In its Regulatory Impact Analysis (RIA) of the proposed rule, USDA acknowledges standardizing and capping SUA calculations will result in 19 percent of SNAP households with children experiencing a SNAP benefit cut of $336 annually, on average. However, this estimate is based on data from 2014. Other organizations have estimated the potential impact to be much higher, with up to 68 percent of affected households being households with children.[[3]](#footnote-3) Better and updated data is needed to fully reflect the potential harm of the SNAP benefit cut on households with children. In addition, the USDA analysis does not estimate the rippling effects of this proposed rule on children. SNAP is far more effective than any other program in lifting families out of deep poverty and is known to improve high school graduation rates, adult earnings, and participant’s overall health. [Insert information about the harm reducing SNAP benefits will have on children in your community here including anecdotes about the impact on health or learning for food-insecure children.] A decision to cut SNAP benefits must analyze the additional impacts cutting SNAP will have on the health and well-being of the Nation's children.

SNAP benefits are already modest—averaging just $1.52 per meal in California.[[4]](#footnote-4) USDA should be strengthening the positive impacts of SNAP for children’s health, well-being, and the nation’s economic activity, not making cuts to SNAP benefits. [I/We] strongly oppose the proposed rule and request the USDA withdraw the rule and work with states to improve their SUA’s under existing flexibility.

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)
2. California Department of Social Services “CalFresh Data Dashboard.” Available at: <https://www.cdss.ca.gov/inforesources/Data-Portal/Research-and-Data/CalFresh-Data-Dashboard>. Accessed on: 10/28/19 [↑](#footnote-ref-2)
3. Estimate provided by the Center on Budget and Policy Priorities. [↑](#footnote-ref-3)
4. Center on Budget and Policy Priorities (CBPP) analysis of Food and Nutrition Services FY2017 SNAP program data. “Supplemental Nutrition Assistance Program (SNAP) Monthly Data FY2017” available at: <https://fns-prod.azureedge.net/sites/default/files/pd/34SNAPmonthly.pdf> [↑](#footnote-ref-4)