ASPHN
Advancing Health Through Leadership

Association of State Public Health Nutritionists
PO Box 37094 • Tucson, AZ 85740-7094
[tel & fax] 814-255-2829 • **www.asphn.org**

September 23, 2019

Kelly Stewart
Chief, Planning and Regulatory Affairs Office
SNAP Program Design Branch
Program Development Division
Food and Nutrition Service, USDA
3101 Park Center Drive
Alexandria, VA 22302

Re: **RIN 0584-AE62, Proposed rule Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP)**

Dear Chief Stewart:

The Association for State Public Health Nutritionists (ASPHN), an Affiliate of the Association of State and Territorial Health Officials, is composed of more than 400 public health nutritionists leading statewide nutrition efforts programs in all 50 states, the District of Columbia and five U.S. territories.

ASPHN's vision is healthy eating and active living for everyone. Our mission is to strengthen nutrition policy, programs and environments for all people through development of public health nutrition leaders and collective action of members nationwide. ASPHN is comprised of registered dietitians, nutritionists, and other health professionals who are closely involved in the implementation of federal nutrition programs. Our collaborative network includes public health programs and providers who play critical roles in delivering public health messages and nutrition programs; i.e. public health nursing, dental health, chronic disease prevention programs and local level agencies working directly and indirectly with the public. You can find ASPHN on the web at www.asphn.org and on Facebook at www.facebook.com/asphn.

The Association of State Public Health Nutritionists (ASPHN) appreciates the opportunity to submit comments in response to the Proposed Rule entitled **Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program**; posted in the Federal Register on July 24, 2019.

ASPHN is strongly opposed to the changes proposed in Broad-Based Categorical Eligibility (BBCE) for SNAP. This Proposed Rule will harmfully impact the health and well-being of 3.1 million people, fully 9 percent of all SNAP participants. Low-income working families with children and households with elderly members will be hit hardest, as many will become even poorer because their loss of SNAP will force them to spend down any of their already-meagre reserves. USDA estimates further that SNAP benefits will be cut by $3 billion a year, or roughly $25 to $30 billion over ten years. [(1)] This will not only deprive families of food, reduce dollars available to food retailers and lose the poverty-reduction benefit of SNAP, but also it will remove the economic stimulus that SNAP provides to businesses and communities by nearly $4.8 billion

every year. BBCE has evolved over multiple Administrations and Congresses since it was first established in the 1980's and 1990's, and most recently it was thoroughly vetted by Congress in the Farm Bill signed by the President in 2018. It works and should not be dismantled.

Less Hunger and Better Health

SNAP is the forward line in our nation's long fight to eliminate hunger and food insecurity. Participation has been shown to reduce food insecurity by 30%, and full participation could help reach this goal. However, in spite of an improving economy, 11% of American households remained food insecure in 2018, meaning that hey reported having limited access to enough food for an active, healthy life. Especially concerning, there was no drop in the proportion of very food insecure households. Fully 4.3% of households reported being so food insecure that they had to reduce their food intake and skip meals because their household lacked money for food. Surprisingly, only 56% of food insecure households used any of the major food assistance programs (SNAP, WIC or school meals), and for SNAP, the rate of participation was only 85% in 2016, even lower among working people at just 75%.

What difference does this make? Food insecurity is associated with higher rates of many chronic diseases and with roughly 45% higher annual health care costs than food secure households. In 2016 alone, direct healthcare costs due to diet-related diseases exceeded $480 billion. [2] SNAP has demonstrated its positive health benefits. SNAP participants report better health than do similar non-participants. SNAP is associated with better birth outcomes, and elderly SNAP participants are less likely to forego their medications due to cost. Adults who as children participated in Food Stamps (now SNAP) had lower rates of heart disease and obesity, and they were much more likely to graduate high school.

Why does this matter? While the typical American diet contributes to higher disease prevalence, premature mortality, and disabilities, [3] these problems are exacerbated among low-income Americans. As the rate of diet-related diseases increases, so does the cost of related healthcare spending, much of which could be avoided through prevention. The BBCE rule that reduces SNAP participation will decrease our nation's ability to respond to the chronically high prevalence of food insecurity and the adverse health impacts that follow.

Low-income Working Families Losing SNAP

SNAP is a work support program. Over 80% of households participating in SNAP worked during the year they received SNAP, and 58% worked while receiving SNAP. It is projected that BBCE will result in 12.5% of working households losing SNAP, as would 7.4% of households with children. Although most SNAP households work, they are still very poor. The average income was just 63% of the Federal Poverty Line (FPL), and 38% had incomes below half of the FPL. Without BBCE, many SNAP recipients will be pushed off the "benefits cliff", defined as an abrupt reduction or loss of the SNAP benefit due to a small increase in earnings.(6) This jeopardizes the well-being of low-income working families since in most cases household earnings have not increased enough for self-sufficiency. Although SNAP benefits average only about $1.35 per person per meal for families with children, they account for a significant portion of the total resources available to low-income families. [4] In fact, SNAP lifted 10% of SNAP households out of poverty in 2017. (FNS, 2019)

SNAP safeguards a high level of procedural veracity via comprehensive stipulations for households applying for or seeking to continue benefits. SNAP has high-level computer programs to detect unreported incomes, vigorous methods to certify reliable assessments of household eligibility, a meticulous Quality Control (QC), and an array of both administrative and criminal enforcement methods. [5]

Hungry Children Struggle in School and in Life

In America today, one in five children lives in poverty, and one in six lives in families that have trouble putting enough food on the table. [6] Food insecurity in households with children is associated with inadequate intake of several important nutrients, deficits in cognitive development, behavioral problems, and poor health during childhood. [7] This is especially true of poor children whose families experience deep poverty, and those who are poor for a long time. [8]

SNAP forms a critical foundation for the health and well-being of America's children, lifting millions of children out of poverty and improving food security. While 42% of SNAP households have children, those households have 19.4 million children and receive 67% of all SNAP benefits. No other nutrition or income support program reaches as many at-risk children or contributes as much to the overall resources of very low-income households with children. [9] In addition to its health and nutrition benefits, SNAP participation can lead to improvements in reading and mathematics skills and increase the chances of graduating from high school. [10]

The Proposed Rule would disqualify 8.7 million households with children from SNAP. In addition, those children would lose automatic certification for nutritious meals at school and the educational support that school nutrition programs provide.

Older Americans Grapple with Food Insecurity and Malnutrition

With the proportion of seniors in the U.S. population growing steadily, the proportion of SNAP households with elderly members has increased to reach 24% in 2017, compared to 15% just 25 years ago. Elders, including the leading edge of Baby Boomers suffering from early chronic diseases and disability, will be hit hard by the proposed rule as they are stretching fixed incomes and modest savings to support themselves as they age. For older adults struggling to get by with limited means, even minor disruptions in their economic circumstances can leave them struggling or unable to pay for food, medicine, and housing.

Millions of seniors in the United States are going without enough food due to economic constraints. A high proportion of food-insecure seniors continues to levy a major health care hardship in America. According to researchers, 13.6% of seniors are marginally food insecure, 7.7% are food insecure, and 2.9% are very low food secure; 8.6 million, 4.9 million, and 1.8 million seniors, respectively. [11] Limiting access to SNAP benefits will accelerate the expansion of health care expenditures on older Americans; as malnutrition among the elderly causes higher rates of injuries, infections, diet related diseases, hospitalization and increased risk of death.

Flexibility and State Administration

The FPL which establishes eligibility for SNAP is the same in each state: $21,330 annually and $2,252 per month for a family of three. [12] However, since the cost of living varies from state to state, households in high cost-of-living states have to be even poorer to qualify for SNAP than those in less costly states, defeating the purpose of SNAP. Therefore, BCCE was enacted to make

the program fairer by allowing states to consider in-state conditions (housing, child care, employment, and social support programs) in the SNAP eligibility processes as long as they continued to meet the uniform FPL requirement. The proposed rule will strip 43 states of this option and potentially disadvantage the 89% of current SNAP participants who reside in those states.

In so doing, the removal of the BBCE option will increase state and local administrative costs and impede efficiency. Effecting the proposed rule will require big-ticket upgrades and expensive new technology. Even though the federal government pays half of state administrative costs, system changes, integration of new systems, increased staff time, and training of this type is expected to result in higher state administrative expenses and to be fiscally detrimental even as many states are fighting to balance their budget while meeting other social, educational and infrastructure needs. Ironically, BBCE was implemented to realize an estimated 7% savings in streamlined administration, avoid duplicating eligibility costs, and reduce errors. It is likely that the updated costs of reversing these efficiencies will exceed 7%.

BBCE also reduces the frequency of "churn". "Churn" ensues when a SNAP household is decertified for SNAP for procedural reasons or due to an increase in income, then becomes eligible again and reapplies within a very short period. When churn rates increase, work is generated for state and local employees who must process repeat applications for each household, and benefit gaps are imposed on the affected SNAP households. BBCE, on the other hand, buttresses a state's administration eligibility determination process by condensing the required paper work, cutting staff time, and reducing administrative costs. In the more than 40 states that have adopted the BBCE policy, households are 26 percent less likely to experience churn over the course of a year than similar households in other states. [13]

Local Economies Fending Off Recession

Economists at USDA found that every dollar spent on SNAP stimulated $1.54 in local economic activity since the start of the Great Recession, especially in rural areas. For every $1 billion spent on SNAP, 13,560 jobs were created, including 500 in agriculture. [14] ASPHN urges USDA to consider the potentially damaging effect the proposed rule will have on economic development. SNAP dollars support local businesses like grocers, food markets, ranches, farms, farmers and the agricultural industry. [15] Most assuredly, a drop of over 3 million individuals no longer receiving SNAP benefits, together with $3 billion fewer SNAP dollars entering the economy, will have an adverse impact on both national and local economies.

Conclusion

In summary, ASPHN vehemently opposes Proposed Rule entitled **Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program**. This proposal challenges the fundamental purpose of the SNAP program and the role that government plays in protecting its citizens. It takes away states' rights, creates undo administrative and financial burden on the states, and penalizes our most at risk populations. SNAP helps lift millions of families with children out of poverty, reduces the depth and severity of poverty for millions more, alleviates food insecurity, and contributes to children's healthy development and long-term prospects. Again, strongly ASPHN urges USDA to rescind the Proposed Rule and looks forward to our continued work together to eliminate food insecurity and improve the health and nutrition of low-income American families.

Sincerely,

Diane Golzynski, PhD, RD
President, ASPHN Board of Directors

References

1. Rosenbaum, D., Bolen, E., Wolkomir, E., Keith-Jennings, B., Cai, L., & Nchako, C. (2017). Administration's 2018 budget would severely weaken and cut the supplemental nutrition assistance program. *Center on Budget and Policy Priorities*,https://www.cbpp.org/sites/default/files/atoms/files/5-31-17fa.pdf. Accessed September 13, 2019
2. Waters H, Graf M. *America's Obesity Crisis: The Health and Economic Costs of Excess Weight Gain*. Milken Institute. October 26, 2018. https://www.milkeninstitute.org/publications/view/944. Accessed September 13, 2019
3. U.S. Department of Agriculture and U.S. Department of Health and Human Services. *U.S. Dietary Guidelines for Americans 2015-2020.* https://health.gov/dietaryguidelines/2015/resources/2015-2020_dietary_guidelines.pdf. Accessed September 13, 2019
4. Carlson, Steven, Dottie Rosenbaum, Brynne Keith-Jennings, and Catlin Nchako. "SNAP works for America's children." Center for Budget and Policy Priorities (2016). https://www.cbpp.org/sites/default/files/atoms/files/9-29-16fa.pdf. Accessed September 13, 2019
5. Rosenbaum, D. (2013). SNAP is Effective and Efficient. Center on Budget and Policy Priorities. https://www.cbpp.org/sites/default/files/atoms/files/7-23-10fa.pdf. Accessed September 13, 2019
6. Proctor, B. D., Semega, J. L., & Kollar, M. A. (2016). Income and poverty in the United States: 2015. *US Census Bureau, Current Population Reports*, P60-256. http://www.census.gov/library/publications/2016/demo/p60-256.html. Accessed September 13, 2019
7. Cook, J., & Frank, D. (2008). Food security, poverty, and human development in the United States. Annals of the New York Academy of Sciences, 1136(1), 193. http://onlinelibrary.wiley.com/doi/10.1196/annals.1425.001/epdf. Accessed September 13, 2019
8. Brooks-Gunn, J., & Duncan, G. J. (1997). The effects of poverty on children. *The future of children*, 55-71. www.princeton.edu/futureofchildren/publications/docs/07_02_03.pdf. Accessed September 13, 2019
9. Anderson, P. M., Butcher, K. F., & Schanzenbach, D. W. (2015). Changes in safety net use during the Great Recession. *American Economic Review*, *105*(5), 161-65. http://www.sesp.northwestern.edu/docs/publications/1064188605560bfd3a080d6.pdf. Accessed September 13, 2019

10. Frongillo, E. A., Jyoti, D. F., & Jones, S. J. (2006). Food stamp program participation is associated with better academic learning among school children. *The Journal of nutrition*, *136*(4), 1077-1080. http://jn.nutrition.org/content/136/4/1077.full. Accessed September 13, 2019
11. Gundersen, C., & Ziliak, J. (2017). The Health Consequences of Senior Hunger in the United States: Evidence from the 1999-2014 NHANES. *Feeding America and the National Foundation to End Senior Hunger.*
12. Rosenbaum, D. (2019). SNAP's "Broad-Based categorical Eligibility" Supports Working Families and Those Saving for the Future. *Center on Budget and Policy Priorities*. https://www.cbpp.org/research/food-assistance/snaps-broad-based-categorical-eligibility-supports-working-families-and. Accessed September 13, 2019
13. Wheaton, S. M. M. L., Ratcliffe, C., Kalish, E., Armstrong, C. R. S., & Oberlin, C. (2016). Asset Limits, SNAP Participation, and Financial Stability. https://www.urban.org/sites/default/files/2000843-asset-limits-snap-participation-and-financial-stability.pdf. Accessed September 13, 2019
14. Pender, J., Jo, Y., & Miller, C. (2015). *Economic Impacts of Supplemental Nutrition Assistance Program Payments in Nonmetro vs. Metro Counties* (No. 330-2016-13884). https://ideas.repec.org/p/ags/aaea15/205626.html. Accessed September 13, 2019
15. Rosenbaum, D. (2013). The relationship between SNAP and work among low-income households. Center on Budget and Policy Priorities. https://www.cbpp.org/sites/default/files/atoms/files/1-29-13fa.pdf. Accessed September 13, 2019