



November 26, 2019

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 Regarding Supplemental Nutrition Assistance Program (SNAP) Standardization of State Heating and Cooling Standard Utility Allowances -- RIN 0584-AE69

Dear SNAP Program Design Branch:

I am writing on behalf of the Center for Law and Social Policy (CLASP) in opposition to the U.S. Department of Agriculture's proposed regulation "Supplemental Nutrition Assistance Program: Standardization of State Heating and Cooling Standard Utility Allowances", published on October 3, 2019" that would cut a total of \$4.5 billion SNAP benefits over five years. The cut would result from changes in how states take households' utility costs into account in determining the amount of SNAP benefits for which they qualify. CLASP is deeply concerned by the attempts to restrict food assistance to individuals for whom SNAP is essential to meeting their basic needs and providing a work support.

CLASP is a national, nonpartisan, anti-poverty nonprofit advancing policy solutions for low-income people. We work at both federal and state levels, supporting policy and practice that makes a difference in the lives of people living in conditions of poverty. CLASP works to develop and implement federal, state, and local policies (in legislation, regulation, and on the ground) that reduce poverty, improve low-income people's lives, and creates pathways to economic security for everyone. That includes directly addressing the barriers people face because of race, ethnicity, and immigration status. Through high-quality analysis grounded in data and on-the-ground experience, effective advocacy, a strong public voice, and hands-on technical assistance, CLASP develops and promotes new ideas, mobilizes others, and provides guidance to government leaders and advocates to help them implement strategies that deliver meaningful results to people across America.

These comments draw on CLASP's deep experience with SNAP, and the role it plays in the lives of people with low incomes, including families with children, young adults, people of color, seniors, students, and people with disabilities

We strongly urge USDA to withdraw this proposed rule.

Background

Food is necessary for people to live, work and thrive. SNAP is our nation's most important anti-hunger program and is proven to reduce poverty¹ and food insecurity.² It provides food assistance to youth, working families, people with disabilities, seniors, and many more. Last fiscal year, SNAP helped 40.3 million people in 20.1 million households put food on the table.³ SNAP puts food on the tables of many Americans across the U.S. More than two-thirds of SNAP participants are in families with children; a third are in households with seniors or people with disabilities. After unemployment insurance, it is the most responsive federal program providing additional assistance during economic downturns.⁴ The SNAP program has been shown to support work⁵, stimulate economic growth,⁶ improve academic outcomes for children⁷, and improve health outcomes for recipients.⁸

Access to SNAP Promotes Food Security, Improves Wellbeing, and Reduces Poverty

SNAP plays a vital role in the health outcomes of children, adults, seniors and people with disabilities who have low income.⁹ The program provides food assistance to low-income postsecondary students, workers, children, people with disabilities, seniors, and many more. For example, access to SNAP in utero and in early childhood increased women's economic mobility due to increased educational attainment, earnings, and income, and reduced poverty in adulthood.¹⁰ According to No Kid Hungry, there are over 11 million children who live in food insecure households in the U.S.¹¹ Food insecurity in children is correlated with multiple health problems such as asthma, learning disorders, cancers, autoimmune diseases and depression.¹² Research conducted by the Food Research and Action Center shows that participation in SNAP for six months reduced the percentage of SNAP households that were food insecure by 6–17 percent, and reduced the percentage that were very low food secure by 12–19 percent.¹³

Access to SNAP Promotes Educational Attainment and Wage Growth

SNAP also provides basic food assistance for students in postsecondary education and supports employment stability and wage growth.¹⁴ SNAP offers a modest assurance that people are able to meet their most basic human need for food first. Studies have shown that lack of access to food and proper nutrition exacerbates stress, anxiety, and depression;¹⁵ causes sleep disturbances and fatigue; and impairs cognitive functioning.¹⁶ Access to SNAP relieves stress, improves vitality, and allows students to focus their energy on improving their educational and employment outcomes. SNAP's structure also supports work because as earnings rise, SNAP benefits phase out gradually.¹⁷ Because of the way SNAP deductions are applied when the benefit amount is calculated, earnings are treated favorably to support wage growth and improve financial stability.

Multiple Proposed Rules Would Reduce Access to SNAP

This is the third proposed rule to be issues that year that would have the effect of reducing access to SNAP and cutting SNAP benefits, following previous proposals on waivers of the time limits for able

bodied adults without dependents and broad-based categorical eligibility. The Urban Institute has estimated that if all of these proposals had been implemented in 2018, the number of households receiving SNAP benefits in the average month would have fallen by 2.1 million (10.8 percent), with the number of participating households falling by more than 15 percent in 13 states. The total SNAP benefits paid would have fallen by \$4.2 billion.¹⁸ Therefore, this proposed rule should be seen in this context, as part of an ongoing effort to reduce access to SNAP through administrative changes.

Standard Utility Allowance in SNAP

Eligibility for SNAP is determined by a household's income and resources. Because the SNAP benefit is based on the funds available to the family to buy food, state agencies subtract deductions such as work expenses, child care, excess housing costs, utilities, and medical expenses from a household's gross income to determine its net income. The net income is used to determine the SNAP benefit amount. Specifically, households are assumed to have one-third of the resulting net income available to purchase food. If that amount is less than the maximum SNAP benefit for a household of their size, the household receives the difference as a SNAP benefit to supplement their income available for food.

Under current law, SNAP takes into account the utility expenses of each SNAP household. States adjust household benefits based on a state-specific Standard Utility Allowance (SUA) calculated by the state and approved by USDA. The current policy allows variances in SUAs to accommodate the differences in utility costs and rates in the US, which allows states flexibility in how they calculate those costs. Throughout 2019, the Administration has unleashed countless attacks on low-income Americans. Most recently, the U.S. Department of Agriculture (USDA) has released a third proposed SNAP rule which will cut SNAP benefits by \$4.5 billion over five years.¹⁹ The USDA said that the proposed rule is supposed to "enhance program integrity and ensure equity among program participants,"²⁰ however, taking away states' ability to set their own SUA is not equity at all. The proposed rule seeks to standardize and cap SUA across all states to cut SNAP costs, although people in multiple states will be adversely impacted—some losing up to \$75 per month according to the USDA's estimates.²¹ This will create widespread hardship -- the Residential Energy Consumption Survey found that nearly a third of the US population has trouble paying their utility bills.²²

Utilities Across the US Differ Based on Location

Utility costs across the nation differ greatly from the national average. For example, electricity costs in Fairbanks Alaska are 110 percent above the national average and in Honolulu Hawaii costs are 60 percent above the national average.²³ Therefore, under the law, both states can set their SUA at a relevant rate which considers the high costs that they have based on the costs in their state. The shortage of natural gas in both states caters to the reasoning as to why their costs are so high, however, in Harlingen, Texas, the utility costs are almost 24% lower than the national average for utility costs.²⁴ The proposed rule states that it is providing equity for SNAP recipients, however, it is not fair to SNAP recipients who pay higher than average utility costs. Standardizing the SUA would have real implications for people who pay a substantial amount for their utility costs based on factors out of their control. Households who pay more for utilities that will receive cuts in their SNAP

benefits, will be much worse off if this proposed rule is implemented.

Renters Have Disproportionately High Utility Costs

Low-income households are much more likely to rent.²⁵ The cost of living has substantially increased over the past ten years across the US. Therefore, it is becoming increasingly more difficult for low-income families to find safe, affordable housing. Many low income families live in homes with significant physical or structural issues.²⁶ Furthermore, utility bills present a hidden threat to the affordability of a family's housing—unknown before a household moves into a unit, and unpredictable from one month to the next.²⁷ Even households receiving housing vouchers may face actual energy costs that far outstrip allowances—rendering their housing unaffordable.²⁸ Moreover, homeowners renting to low-income households often do not have the incentive to make homes more energy efficient if the renters are paying the utility costs; this can result in disproportionately high utility costs for low-income renters. According to the National Low-Income Housing Coalition, low-income renter households are more likely to live in energy-inefficient units and face higher energy cost burdens than higher-income households.²⁹ The proposed rule does not take high utility costs for renters with low-incomes into consideration.

The Proposed Rule Will Harm Millions of Children in the U.S.

13.1 million children lived in food-insecure households that had difficulty affording nutritious food to support an adequate diet SNAP is a critical program for children because it provides access to an adequate diet which has long-lasting benefits for children. Two-thirds of SNAP benefits go to children.³⁰ In 2018, 1.3 million children were lifted out of poverty by SNAP.³¹ Over 9.2 million households with children receive SNAP benefits.³² The proposed rule will result in 19 percent of SNAP households with children experiencing a SNAP benefit cut of \$336 annually, on average.³³ While some households with children would see a modest benefit increase under the proposal, it would still result in a net reduction in SNAP benefits for households with children nationwide.³⁴ Household with children make up 68 percent of the 7 million people who will experience SNAP benefits cuts that will total \$4.5 billion over five years.³⁵ Monthly SNAP benefits, which average just \$1.40 per meal per person, are often too low to last families with children the entire month.³⁶ The proposed rule disproportionately affects children and is overwhelmingly harmful to children's food security, income, and wellbeing.

Children from low-income families are more likely to have health, behavioral, academic, learning and emotional problems. However, access to SNAP increases the overall health, well-being, academic success and cognitive development because through SNAP children are able to access an adequate and healthy diet.³⁷ SNAP improves the short and long-term well-being of children who receive it.³⁸

Children also benefit from their mothers receiving SNAP before and during pregnancy. The U.S. Centers for Disease Control strongly recommends that even before conceiving, women achieve a healthy weight and nutritious diet in order to maximize their odds of a healthy pregnancy.³⁹ Nutrition assistance has been documented to promote healthy birth outcomes as well as to have long-term benefits for the children of recipients. Researchers compared the long-term outcomes of

individuals in different areas of the country when SNAP expanded nationwide in the 1960s and early 1970s and found that mothers exposed to SNAP during pregnancy gave birth to fewer low-birth-weight babies.⁴⁰ If women in early pregnancy are cut off from nutrition services, the negative outcomes would extend decades into the future, diminishing their children's opportunity to thrive in tangible and entirely preventable ways.⁴¹ Low-income women are already more likely to have poorer nutrition and greater stress, which can impair fetal brain development and health during pregnancy.⁴² Economic stressors, combined with inadequate prenatal care for low-income pregnant women, are associated with higher rates of preterm births and infant mortality.⁴³

The Proposed Rule Will Harm Many Seniors and People with Disabilities in the U.S.

About 71 million people in the United States are age 60 and older.⁴⁴ Many live on fixed incomes and have limited financial means to afford expenses such as food, medical, or housing costs. Many have disabilities or take care of children. Unfortunately, food insecurity among seniors is all too common a problem. In 2017, 30 percent of all U.S. households included individuals aged 65 and older. Of this group, 7.7 percent (3 million) were food insecure, meaning that these households had difficulty affording nutritious, adequate food.⁴⁵ SNAP helps many low-income seniors to afford food, so they don't have to make the decision between paying for necessary medications or food—allowing them to use their fixed incomes for other pertinent expenses.

Research indicates that food-insecure seniors have less nutritious diets, have worse health outcomes, and are at higher risk for depression than food-secure seniors.⁴⁶ Compared to other adult age groups, seniors are particularly vulnerable to the health consequences of food insecurity. Food-insecure seniors are twice as likely to report experiencing fair or poor general health; are 65 percent more likely to be diabetic, 57 percent more likely to have congestive heart failure, and 91 percent more likely to have asthma; and are 2.3 times more likely to suffer from depression.⁴⁷ Households with grandchildren are almost three times as likely to be food insecure. SNAP benefits help to alleviate these adverse conditions. For these seniors, the SNAP plays an important role. While it provides a modest benefit, just \$105 a month on average for households with members age 60 or older, it enables them to meet their basic food needs.⁴⁸

Having a disability can make it very difficult for people with disabilities or their caregivers to work and put food on the table. A staggering 20 percent of people with disabilities live in poverty and they are more likely to be food insecure.⁴⁹ The presence of a disability increases the risk of food insecurity significantly, and the combination of the reduced ability to earn income and the higher costs of health care, adaptive equipment such as wheelchairs, and other supports can strain household food budgets.⁵⁰ Programs like SNAP help to provide critical support to people with disabilities who need to make ends meet. SNAP supplements some of the cost of food, therefore, participants can spend more of their fixed incomes on housing, transportation, and health care costs

About 8 million people in 4.3 million households receiving SNAP have disabilities. According to the administration's own estimates, over 320,000 individuals with disabilities within 192,000 households would lose SNAP benefits due to the proposed rule.⁵¹ Poor nutrition and an inadequate diet can lead to or worsen the health conditions for people with disabilities. Experiencing cuts to SNAP benefits

for these households would increase food insecurity and exacerbate health challenges and health care costs.⁵²

The standard utility allowance is a tool states have been able to utilize to help low-income people continue to put food on the table while still paying for basic needs like high utility costs. People with disabilities and seniors, many of whom live on fixed incomes, stand to lose the most under this proposed rule. Specifically, seniors and people with disabilities and their families typically live with a range of unexpected expenses. Air or heating costs may run higher depending on a person's diagnosis and their health-related needs. According to the USDA's Regulatory Impact Analysis, households with seniors and people experiencing a disability are not subject to the cap on the allowable excess shelter deduction, and thus are more likely to be impacted by changes to the SUA. Households with elderly or disabled members make up a disproportionate share of those who lose benefits.⁵³ Households with seniors or people experiencing disabilities could lose up to \$36 a month in benefits,⁵⁴ which could mean a lot for a household on a fixed income that has other major healthcare expenses to consider.

The Proposed Rule Would Create Another Hurdle for People of Color Trying to Exit Poverty

SNAP plays a critical role in addressing hunger and food insecurity in the communities of people of color. In 2015, SNAP lifted approximately 2.1 million Black people (including 1 million children)⁵⁵ and an estimated 2.5 million Latinos (including 1.2 million children) out of poverty.⁵⁶ Nearly three percent of Asian American and Pacific Islander (AAPI) families receive SNAP benefits,⁵⁷ while many more are likely eligible but unenrolled due to cultural stigma and insufficient program outreach to AAPI groups.⁵⁸ This rule would affect communities of color across the nation cutting SNAP benefits for over 2.5 million Black participants, 318,000 for Asian participants, and 1.2 million Hispanic or Latinx participants.⁵⁹ Unfortunately they did not provide specific data for how Native and Indigenous people would be impacted. The Residential Energy Consumption Survey found that nearly a third of the US population has trouble paying their utility bills.⁶⁰ People of color represent a disproportionate amount of that population, with over half being Black and 40 percent being Latino.⁶¹ The proposed rule would create another hurdle for people of color trying to exit poverty. Historically, policies such as The Homestead Act, The Chinese Exclusion Act, and even the Social Security Act, were often designed to exclude people of color. American policy makers continue to disregard the implications of their policies on people of color. Now, not only will folks struggle to pay their utility bills, but they will also struggle even more to put food on the table.

The Proposed Rule Would Harm College Students

Overwhelming evidence links each level of postsecondary education achieved with improved social, economic, and health outcomes.⁶² However, post-secondary education is often out of reach for students with low incomes, many of whom receive little or no financial support from their family for school and who have significant unmet need, even after financial aid.⁶³ Students of color (approximately 40 percent of all college students) face additional systemic barriers that hinder access and completion, contributing to less successful outcomes in higher education. For these reasons today's students require robust supports that promote their ability to attain a postsecondary

credential leading to a living-wage job.⁶⁴ Low-income students who are parenting, or combining school and work, are often eligible for food assistance under SNAP. Access to SNAP provides the safety net needed for post-secondary students to achieve economic success.

Low-income individuals enroll in postsecondary programs at increasing rates because they understand that postsecondary education is the most reliable pathway to economic security. Without access to SNAP, low-income students who are food insecure may lack the access to food that to persist in and successfully complete their postsecondary education.⁶⁵

Conclusion

In conclusion, we urge the Department to withdraw the proposed regulation in its entirety. The administration is seeking to provide “equality” among SNAP benefits recipients, however, equality is damaging because it can have a negative impacts due to its lack of consideration of differences. Great change is about equity, where each household’s circumstances are taken into consideration to decide what benefit amount is needed to lessen the food insecurity in their home. Historically, there are disparate impacts when Administrations make policy decisions based on equality and generalization of the needs of people. Standardizing and capping SUA for the SNAP program does not consider the differing costs of utilities across the US. The SUA in each state should reflect the current utility costs in that state to best serve SNAP recipients equitably and in a manner that best suits their needs.

As anti-poverty experts, we believe that the proposed changes will harm millions of households in the US. who receive SNAP—households that will overwhelmingly include children, seniors, students, people of color and people experiencing disabilities. This is the third attempt to cut or totally eliminate households’ SNAP benefits by the Trump Administration. This rule is harmful to SNAP recipients and does not allow states the ability to make relevant decisions for their constituents. The proposed rule to standardize and cap the SUA seeks to cut \$4.5 billion in SNAP benefits over five years. CLASP is deeply concerned by the attempts to restrict food assistance to individuals for whom SNAP is essential to meeting their basic needs.

Lastly, our comments include citations to supporting research and documents for the benefit of the Food and Nutrition Service in reviewing our comments. We direct FNS to each of the items cited and made available to the agency through active hyperlinks and as attachments, and we request that these, along with the full text of our comments, be considered part of the formal administrative record on this proposal.

Thank you for the opportunity to submit these comments. Contact Elizabeth Lower-Basch (elowerbasch@clasp.org) and Parker Gilkesson (pgilkesson@clasp.org) with any questions.

Appendix A: Contributors to CLASP's Public Comment

Listed Alphabetically

Parker Gilkesson is a policy analyst with CLASP's Income and Work Support team. She works with low-income and work support programs with a focus on the Supplemental Nutrition Assistance Program (SNAP). Parker is a subject matter expert in social policy, benefit eligibility, human services delivery, racial equity, and state and local policy regarding SNAP, TANF, and Medicaid. Prior to joining CLASP, Parker began her career as a Human Services Specialist in Mecklenburg County, Charlotte, NC. In this role, she worked directly with recipients receiving Medicaid, TANF, and SNAP to determine their eligibility for low-income and work support programs. She has other experience including TANF policy research, cancer research, public health, public service, and nonprofits. Parker holds a Master of Public Policy, with a concentration in Public Administration from Liberty University and a Bachelors in Health Education, Maternal and Child Health from Howard University. Furthermore, Parker believes in the importance of bridging the gap between policy analysis and policy effectiveness. She is very passionate about social change taking place within our communities, therefore, Parker aspires to be a part of the equation to solve poverty and inequities in health and social welfare among citizens of the United States.

Elizabeth Lower-Basch is director of CLASP's income and work supports team. In this role, she leads a team of experts focused on federal and state cash assistance, Medicaid, SNAP, and refundable tax credits, and how they impact the lives of people with low-incomes. Ms. Lower-Basch has expertise in both federal policy development and in effective and cross-cutting implementation of federal policy. She also co-chairs the Protecting Immigrant Families, Advancing Our Future campaign, a multi-organizational campaign dedicated to protecting access to income and work supports programs for immigrants and their families. From 1996 to 2006, Ms. Lower-Basch worked for the Office of the Assistant Secretary for Planning and Evaluation at the U.S. Department of Health and Human Services. In this position, she was a lead policy analyst, supporting legislative and regulatory processes during the implementation of the Temporary Assistance for Needy Families (TANF) block grant and managing research projects. She received a bachelor's degree in History from Yale University, writing her thesis on pro- and anti-immigrant tendencies in the 19th century American labor movement and a master's degree in public policy from Harvard University's Kennedy School of Government.

Darrel Thompson is a research assistant with CLASP's Income and Work Supports team. He provides research support and analysis on various low-income and work support programs. Prior to joining CLASP, Darrel interned at the Center on Budget and Policy Priorities and the Lou Frey Institute of Politics and Government. He holds a bachelor's degree in political science from the University of Central Florida.

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