



AMERICAN PUBLIC HEALTH ASSOCIATION

For science. For action. For health.

September 19, 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 -- Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP) RIN 0584-AE62

Dear SNAP Program Design Branch:

On behalf of the American Public Health Association, a diverse community of public health professionals that champions the health of all people and communities, I appreciate the opportunity to comment on the U.S. Department of Agriculture's Notice of Proposed Rule Making, "Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP)." We are deeply concerned by the proposed changes, and fear that they would increase food insecurity and hunger in the U.S. This would undermine the health and well-being of millions of Americans. As an association dedicated to improving the public's health and creating equity in health status, we urge you to withdraw the rule in its entirety.

Nearly one in eight American households experience food insecurity during the year.¹ Food insecurity, defined by USDA as a "lack of consistent access to enough food for an active, healthy life,"² is a risk factor for negative psychological and health outcomes.³ Food insecurity has deleterious impacts on health through increases in the prevalence and severity of diet-related disease, such as obesity, type 2 diabetes, heart disease, stroke, and some cancers.^{4,5,6}

SNAP plays a critical role in addressing hunger and food insecurity in our nation. It is the first line of defense against hunger for low-income residents, and research continually demonstrates that SNAP participation is effective in reducing food insecurity.^{7,8,9} According to one estimate, SNAP participation reduces food insecurity by approximately 30%.¹⁰

SNAP participation improves child, adult, and senior health outcomes, including physical and mental health.¹¹ For example, SNAP participation increases the probability of self-reporting "excellent" or "good health,"¹² lowers the risk of poor glucose control (for those with diabetes)¹³ and has a protective effect on mental health.¹⁴ SNAP participation also helps reduce stress for individuals and families who are burdened with concerns about finances, and stress is highly correlated with poor health outcomes.¹⁵

The proposed rule would gut states' 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").

By USDA's own estimates, the proposed rule would cut SNAP benefits over five years by \$10.543 billion, while increasing SNAP administrative costs by \$2.314 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." The proposed rule would eliminate SNAP benefits for 3.1 million individuals, take free school meals away from 500,000 children in those families, and punish people with even meager savings.

Children in households that participate in SNAP are directly certified in federally subsidized free school meals. Broad-based categorical eligibility ensures that hundreds of thousands of children are able to receive free school meals instead of reduced-price, providing relief to families while reducing paperwork on both parents and school systems. The proposed rule would leave as many as 500,000 children without access to free school meals.

Proposals that would undermine Cat El can be expected to entail impacts on access to free school lunches. For example, during congressional consideration of 2018 Farm Bill proposals that would undermine Cat El, the Congressional Budget Office provided estimates of the numbers of children who would lose school meals as a result of the policy change. USDA fails to provide an analysis of the impact that the proposed rule would have on free school meals and therefore does not provide adequate opportunity for informed comment.

Furthermore, USDA concedes that the proposed rule would eliminate SNAP for an estimated 600,000 persons aged 60 or older. This is particularly disturbing in light of the importance of access to good nutrition for elderly individuals' health and well-being.

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 proposed rule is an attempt to side step Congress and is outside USDA's authority.

APHA strongly opposes the proposed rule, as it would cut food benefits for struggling people and undermine public health across our nation. For the foregoing reasons, we urge you to withdraw the rule in its entirety. Thank you for your attention to our comments.

Sincerely,

A handwritten signature in black ink that reads "Georges C. Benjamin". The signature is written in a cursive, flowing style.

Georges C. Benjamin, MD
Executive Director

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- ¹ Coleman-Jensen, A., Rabbit, M. P., Gregory, C. A. & Singh, A. (2018). Household food insecurity in the United States in 2017. *Economic Research Service Report*, 256, Washington, DC: U.S. Department of Agriculture, Economic Research Service.
- ² Economic Research Service, U.S. Department of Agriculture. (2018). *Definitions of Food Security*. Available at <https://www.ers.usda.gov/topics/food-nutrition-assistance/food-security-in-the-us/definitions-of-food-security.aspx> Accessed October 3, 2018.
- ³ Hartline-Grafton, H. (2017). *The Impact of Poverty, Food Insecurity, & Poor Nutrition on Health and Well-Being*. Washington, DC: Food Research & Action Center.
- ⁴ Franklin B. Jones, A., Love, D., Puckett, S., Macklin, J., & White-Means, S. (2012). Exploring mediators of food insecurity and obesity: a review of recent literature. *Journal of Community Health*, 37(1), 253-264.
- ⁵ Berkowitz, S., A., Karter, A., J., Corbie-Smith, G., Seligman, H. K., Ackroyd, S. A., Barnard, L. S., Atlas, S. J., & Wexler, D. J. (2018). Food insecurity, food “deserts,” and glycemic control in patients with diabetes: a longitudinal analysis. *Diabetes Care*, 19, 171981
- ⁶ Gregory, C., A., & Coleman-Jensen, A. (2017). Food insecurity, chronic disease, and health among working-age adults. *Economic Research Report*, 235. Washington, DC: U.S. Department of Agriculture, Economic Research Service.
- ⁷ Mabli, J., & Worthington, J. (2014). Supplemental Nutrition Assistance Program participation and child food security. *Pediatrics*, 133(4), 1-10.
- ⁸ Ratcliffe, C., McKernan, S. M., & Zhang, S. (2011). How much does the Supplemental Nutrition Assistance Program reduce food insecurity? *American Journal of Agricultural Economics*, 93(4), 1082-1098.
- ⁹ Nord, M. (2012). How much does the Supplemental Nutrition Assistance Program alleviate food insecurity? Evidence from recent programme leavers. *Public Health Nutrition*, 15(5), 811-817
- ¹⁰ Ratcliffe, C., McKernan, S. M., & Zhang, S. (2011). How much does the Supplemental Nutrition Assistance Program reduce food insecurity? *American Journal of Agricultural Economics*, 93(4), 1082-1098.
- ¹¹ Hartline-Grafton, H. (2017). *SNAP and Public Health: The Role of the Supplemental Nutrition Assistance Program in Improving the Health and Well-Being of Americans*. Washington, DC: Food Research & Action Center.
- ¹² Gregory, C. A., & Deb, P. (2015). Does SNAP improve your health? *Food Policy*, 50, 11-19.
- ¹³ Mayer, V. L., McDonough, K., Seligman, H., Mitra, N., & Long, J. A. (2016). Food insecurity, coping strategies and glucose control in low-income patients with diabetes. *Public Health Nutrition*, 19(6), 1103-1111.
- ¹⁴ Leung, C. W., Epel, E. S., Willett, W. C., Rimm, E. B., & Laraia, B. A. (2015). Household food insecurity is positively associated with depression among low-income Supplemental Nutrition Assistance Program participants and income-eligible nonparticipants. *Journal of Nutrition*, 145(3), 622-627.
- ¹⁵ Juster, R-P., McEwen, B. S., & Lupien, S. J. (2010). Allostatic load biomarkers of chronic stress and impact on health and cognition. *Neuroscience and Biobehavioral Reviews*, 35(1), 2-16.