



December 2, 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:

The Children's Defense Fund (CDF) appreciates the opportunity to comment on USDA's Notice of Proposed Rulemaking: Supplemental Nutrition Assistance Program regarding Supplemental Nutrition Assistance Program (SNAP) Standardization of State Heating and Cooling Standard Utility Allowances. CDF's Leave No Child Behind® mission is to ensure every child a *Healthy Start*, a *Head Start*, a *Fair Start*, a *Safe Start* and a *Moral Start* in life and successful passage to adulthood with the help of caring families and communities. CDF provides a strong, effective and independent voice for *all* the children of America who cannot vote, lobby or speak for themselves. We pay particular attention to the needs of poor and minority children and those with disabilities. CDF educates the nation about the needs of children, including child and family hunger and encourages preventive investments before they get sick, drop out of school, get into trouble or suffer family breakdown.

CDF has worked for many years, in collaboration with other organizations, to end child hunger in America. Hunger and malnutrition jeopardize children's health, development, education and career readiness. Government programs, including the Supplemental Nutrition Assistance Program (SNAP), have long helped to reduce child hunger and lift families out of poverty. Child poverty hurts the nation's economic stability and costs nearly \$700 billion a year in lost productivity and extra health and crime costs.<sup>1</sup> Today, SNAP helps feed over 18 million children – nearly 1 in 4 – and prevents children and families from going hungry. In 2018, SNAP lifted more than 1.3 million children out of poverty, more than any other government program.<sup>2</sup> In addition to reducing child food insecurity,<sup>3</sup> SNAP provides other long-term benefits and improvements in children's health, nutrition, education and future earnings.<sup>4</sup>

**Given the critical role SNAP plays for children, families and communities across the country, we have serious concerns about the proposed rule to limit states' flexibility to set the Standard**

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<sup>1</sup> 2019. "Ending Child Poverty Now." Children's Defense Fund. <https://www.childrensdefense.org/ending-child-poverty-now/>.

<sup>2</sup> 2019. "New Census Data Reveals Continued Child Poverty Crisis in America." Children's Defense Fund, September 10. <https://www.childrensdefense.org/2019/new-census-data-reveals-continued-child-poverty-crisis-in-america/>.

<sup>3</sup> Food and Nutrition Service. 2014. "Measuring the Effect of SNAP Participation on Food Security." US Department of Agriculture. <https://www.fns.usda.gov/measuring-effect-snap-participation-food-security-0>.

<sup>4</sup> 2015. "Long-Term Benefits of the Supplemental Nutrition Assistance Program." Executive Office of the President of the United States. [https://obamawhitehouse.archives.gov/sites/obamawhitehouse.archives.gov/files/documents/SNAP\\_report\\_final\\_nonembargo.pdf](https://obamawhitehouse.archives.gov/sites/obamawhitehouse.archives.gov/files/documents/SNAP_report_final_nonembargo.pdf).

**Utility Allowance (SUA) as the proposed change would result in a reduction in benefits for many hungry children and families across the country and exacerbate the struggles many low-income families have paying for both food and utilities.** Currently, SNAP takes into account the utility expenses of each SNAP household based on a state-specific SUA calculated by the state and approved by USDA, allowing states flexibility in how they calculate those costs to accommodate for differences in utility costs and rates. The proposed rule would standardize and cap SUA calculations across the country based on utility expense survey data for those no higher than the 80th percentile of low-income people despite 21 states having SUAs that exceed the 85th percentile estimates. In its Regulatory Impact Analysis (RIA) of the proposed rule, USDA acknowledges that standardizing and capping SUA calculations will cut program benefits by a total of \$4.5 billion over five years.<sup>5</sup> Although 13 percent of households with children would see benefit increases averaging \$13, the loss of benefits is far greater as 15.2 percent of households with children would see benefit losses averaging \$27.<sup>6</sup> *Given the disproportionate impact this rule will have on children and families, we strongly urge you to withdraw this harmful proposal.*

**The proposed rule will have a disturbing and lasting impact on children and families as research shows the loss of SNAP benefits or reduction in benefits has detrimental impacts on food security and health of participants, especially infants and children.** Compared to young children whose families consistently received SNAP, young children in households whose SNAP benefit had been reduced were 55 percent more likely to be child food insecure, 36 percent more likely to be in poor health, 70 percent more likely to be at risk of developmental delays and 12 percent more likely to be hospitalized.<sup>7</sup> Food insecurity – even less severe levels of food insecurity – has direct and indirect impacts on the physical and mental health of people of all ages but is especially detrimental to the health and development of children. Food insecurity, for instance, is associated with numerous common and costly health concerns among infants and children including birth defects and low birth weight as well as developmental risk, mental health problems and more frequent colds and stomachaches. Experiencing food insecurity during childhood can have lasting impacts on infants and children as it is associated with lower health status, lower health-related quality of life, lower physical functioning and poor educational performance and academic outcomes.<sup>8</sup> By cutting SNAP benefits, this proposed rule will have serious short-term and long-term effects on the health, development and well-being of infants and children.

Thank you for the opportunity to comment on USDA's proposed rule to limit states' flexibility to set the Standard Utility Allowance (SUA). Given the severe impact the rule would have on hungry children and families across the country who would experience losses in food assistance, we strongly oppose this proposed rule and urge the administration to withdraw it. SNAP has a proven track record of reducing food insecurity, lifting people out of poverty and generating economic activity. Therefore, rather than attempting to reduce assistance for millions of people, USDA should be working to increase SNAP benefits and strengthen SNAP's positive impacts of children's health, wellbeing, and economic security. We appreciate your consideration of our comments.

Sincerely yours,

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<sup>5</sup> Food and Nutrition Service. 7 CFR Part 273. <https://www.regulations.gov/document?D=FNS-2019-0009-0002>.

<sup>6</sup> Wheaton, Laura. 2019. "Estimated Effect of Recent Proposed Changes to SNAP Regulations." Urban Institute. [https://www.urban.org/sites/default/files/publication/101368/estimated\\_effect\\_of\\_recent\\_proposed\\_changes\\_to\\_snap\\_regulations.pdf](https://www.urban.org/sites/default/files/publication/101368/estimated_effect_of_recent_proposed_changes_to_snap_regulations.pdf).

<sup>7</sup> Ettinger de Cuba, Stephanie et al. 2013. "Unintended Consequences of Cutting SNAP Benefits." Children's Health Watch. [https://childrenshealthwatch.org/wp-content/uploads/cliffeffect\\_report\\_dec2013.pdf](https://childrenshealthwatch.org/wp-content/uploads/cliffeffect_report_dec2013.pdf).

<sup>8</sup> Food Research & Action Center. 2017. "The Impact of Poverty, Food Insecurity, and Poor Nutrition on Health and Well-Being." <https://frac.org/wp-content/uploads/hunger-health-impact-poverty-food-insecurity-health-well-being.pdf>.

A handwritten signature in black ink that reads "Kathleen King". The script is cursive and fluid, with the first name and last name clearly distinguishable.

Kathleen King

Interim Policy Director

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