

September 23, 2019

Program Design Branch, Program Development Division  
Food and Nutrition Service, USDA  
3101 Park Center Dr., Alexandria, VA 22302

## **RE: Comments to the USDA Regarding Proposed Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program [FNS-2018-0037]**

To Whom It May Concern:

**I am writing on behalf of New America's early education experts to strongly oppose the proposed rule change to categorical eligibility in the Supplemental Nutrition Assistance Program (SNAP)<sup>1</sup> because removing access to food is harmful to children's health, education, and prosperity.**

The Administration's own estimates state that the proposed rule would take SNAP benefits away from 3.1 million people nationwide, which includes an estimated 686,192 households with children across the United States.<sup>2</sup>

**SNAP helps prevent food insecurity and its potentially harmful impacts on children's health and development.**

Food insecurity, or the lack of access to nutritious food due to lack of adequate resources, impacts nearly one in six children nationwide.<sup>3</sup> When children are food insecure, they may experience diminished social functioning skills, lower academic performance,<sup>4</sup> and decreased likelihood of high school graduation.<sup>5</sup> Children experiencing

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<sup>1</sup> Proposed Rule, "Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP)," *Federal Register* 84, no. 142 (July 24, 2019): 35570, <https://www.federalregister.gov/documents/2019/07/24/2019-15670/revision-of-categorical-eligibility-in-the-supplemental-nutrition-assistance-program-snap#open-comment>

<sup>2</sup> Mathematica, "State-by-State Impact of Proposed Changes to Broad-Based Categorical Eligibility in SNAP," 2019, <https://www.mathematica-mpr.com/dataviz/impact-of-bbce-proposal-on-snap-caseloads>

<sup>3</sup> Feeding America, "Child Food Insecurity," 2019, [https://www.feedingamerica.org/sites/default/files/2019-05/2017-map-the-meal-gap-child-food-insecurity\\_0.pdf](https://www.feedingamerica.org/sites/default/files/2019-05/2017-map-the-meal-gap-child-food-insecurity_0.pdf)

<sup>4</sup> Diana F. Jyoti, Edward A. Frongillo, and Sonya J. Jones, "Food Insecurity Affects School Children's Academic Performance, Weight Gain, and Social Skills," *The Journal of Nutrition*, 135(12), 2831–2839, <https://academic.oup.com/jn/article/135/12/2831/4669915>

<sup>5</sup> Food Research and Action Center, "The Impact of Poverty, Food Insecurity, and Poor Nutrition on Health and Well-Being," December 2017, <http://frac.org/wp-content/uploads/hunger-health-impact-poverty-food-insecurity-health-well-being.pdf>

food insecurity are also more likely to suffer chronic health conditions that can last into adulthood, such as diabetes, obesity, and cardiovascular disease.<sup>6</sup>

The negative implications of the rule change are not spread evenly; children in certain states would be harmed more by the changes to categorical eligibility than in others. For example, in Iowa and Wisconsin, 16 percent of households with children would lose SNAP. In Washington state, that figure climbs to 19 percent of households with children currently receiving SNAP losing access to food, or nearly one in five.<sup>7</sup>

The receipt of SNAP benefits has been found to reduce the likelihood of food insecurity in children by 16.2 percent,<sup>8</sup> suggesting that the program is accomplishing its intended goal. From its inception, children have benefitted from SNAP, and research has suggested that the younger the beneficiary, the greater the overall health benefit.<sup>9</sup>

**The proposed change to SNAP eligibility could prevent over half a million children from participating in school meal programs.**

Hungry children who are no longer able to eat at home may also lose access to food at school. If the rule change takes effect, more than 500,000 children will lose automatic access to free school meals through the National School Lunch Program and School Breakfast Program.<sup>10</sup>

If children lose automatic enrollment in the free school lunch program, their parents will have to re-apply, creating a lapse in access to food and an administrative burden on families and schools. This process creates barriers to food for children whose parents do not successfully fill out the application, speak a language other than English, or fail to respond to income verification inquiries. When methods like income verification are used to remove families from supplemental school meal programs, many fail to reapply even though their children are still eligible.<sup>11</sup>

Furthermore, schools with large numbers of students who participate in means-tested public assistance programs, such as SNAP, may provide universal free breakfast and

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<sup>6</sup> Hilary W. Hoynes, Diane Whitmore Schanzenbach, and Douglas Almond, “Long Run Impacts of Childhood Access to the Safety Net,” National Bureau of Economic Research, 2012, <https://www.nber.org/papers/w18535.pdf>

<sup>7</sup> Ibid.

<sup>8</sup> Caroline Ratcliffe and Signe-Mary McKernan, “How Much Does Snap Reduce Food Insecurity?,” The Urban Institute, April 2010, <https://www.ers.usda.gov/webdocs/publications/84336/ccr-60.pdf?v=0>

<sup>9</sup> Ibid

<sup>10</sup> Suzy Khimm, “Trump plan failed to note that it could jeopardize free school lunches for 500,000 children, Democrats say,” NBC News, July 19, 2019, <https://www.nbcnews.com/politics/white-house/trump-plan-failed-note-it-could-jeopardize-free-school-lunches-n1035281>.

<sup>11</sup> Madeleine Levin & Jessie Hewins, “Universal Free School Meals: Ensuring That All Children Are Able To Learn,” The Shriver Center on Poverty Law, <https://www.povertylaw.org/clearinghouse/articles/meals>



lunch to all students enrolled through community eligibility.<sup>12</sup> If hundreds of thousands of children lose access to SNAP through this rule change, their schools could lose community eligibility, causing untold additional children currently receiving school meals to lose access.

School lunch participation improves children's dietary intake, positively impacts overall health, and reduces risks from food insecurity.<sup>13</sup> School breakfast participation has been shown to improve academic grades, boost standardized test scores, and reduce absenteeism.<sup>14</sup> Paperwork should not stand in the way of any hungry child accessing the food they need to be successful in school.

### **SNAP helps move children and families out of poverty.**

Studies have shown that poverty can be an obstacle to educational success, and that the income achievement gap is growing<sup>15</sup>. Participation in the SNAP program can help children and families move out of poverty.<sup>16</sup> A Center on Budget and Policy Priorities report cites evidence that the SNAP program kept 10.3 million people out of poverty in 2012, nearly half of whom were children.<sup>17</sup> In addition, SNAP lifted 2.1 million children out of deep poverty, and was more effective in doing so than any other program that year.

By protecting categorical eligibility and making further, deeply needed investments in SNAP, we can ensure that food is available to families across our nation and that no child, at home or at school, will starve.

**In conclusion, we strongly oppose the proposed revision to categorical eligibility in SNAP.** Thank you for considering these comments.

Sincerely,

Elise Franchino  
Early and Elementary Education Initiative  
New America

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<sup>12</sup> Evie Blad, "Thousands of Students Could Lose Free School Meals if SNAP Changes," Education Week, July 23, 2019,

<http://blogs.edweek.org/edweek/campaign-k-12/2019/07/snap-school-lunch.html>

<sup>13</sup> Food Research and Action Center, "Benefits of School Lunch," 2019,

<https://www.frac.org/programs/national-school-lunch-program/benefits-school-lunch#targetText=School%20lunch%20is%20critical%20to,obesity%20rates%2C%20and%20poor%20health>

<sup>14</sup> Centers for Disease Control and Prevention, "Eating Healthier at School Improves Learning," November 26, 2018, <https://www.cdc.gov/features/school-lunch-week/index.html>

<sup>15</sup> Vanessa Sacks, "The other achievement gap: Poverty and academic success," ChildTrends, <https://www.childtrends.org/the-other-achievement-gap-poverty-and-academic-success>

<sup>16</sup> Sabrina Tavernise, "Food Stamps Helped Reduce Poverty Rate, Study Finds," The New York Times, April 9, 2012,

<https://www.nytimes.com/2012/04/10/us/food-stamp-program-helping-reduce-poverty.html>

<sup>17</sup> Steven Carlson, Dorothy Rosenbaum, Brynne Keith-Jennings, and Catlin Nchako, "SNAP Works for America's Children," Center on Budget and Policy Priorities, September 29, 2016,

<https://www.cbpp.org/sites/default/files/atoms/files/9-29-16fa.pdf>

