

Congress of the United States
Washington, DC 20510

September 23, 2019

Brandon Lipps
Deputy Under Secretary
Food, Nutrition, and Consumer Service
U.S. Department of Agriculture

Certification Policy Branch
Program Development Division
Food and Nutrition Service
3101 Park Center Drive
Alexandria, VA 22302

Re: Docket FNS-2018-0037

Dear Deputy Undersecretary Lipps:

We write in strong opposition to the Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP) and urge you to abandon this proposal because it would cause tens of thousands of our constituents to lose access to the SNAP benefits and it is directly contrary to bipartisan Congressional intent.

This proposed rule dramatically curtails our state's ability to assist families in need. First, it bars the expansion of SNAP benefits to families living above 130 percent of the federal poverty line. Connecticut, which has some of the highest cost of living in the country, allows certain individuals who earn up to 185 percent of the federal poverty level to enroll in SNAP. This allows low-income working families who struggle with costly monthly expenses like rent or child care to get help putting food on the table. Secondly, the proposed rule would force Connecticut to re-impose an asset limit test on most SNAP participants. By discouraging SNAP participants from saving, this policy runs in direct contrast to SNAP's mission to increase self-sufficiency since additional assets help low-income families better deal with unexpected expenses or other financial challenges.¹ As a result of these changes, this rule would mean that over 57,000 Connecticut individuals—including working families, children, senior citizens, and disabled individuals—would see a decrease or a loss of SNAP benefits.²

The Administration's assumption that individuals are receiving SNAP benefits "when they clearly don't need it" is incorrect. SNAP is a critical lifeline for low-wage workers, families with young children, those who are in-between jobs, and families that have high expenses that leave them with little to no income available for food. Even under broad-based categorical eligibility,

¹ Center on Budget and Policy Priorities. "SNAP's 'Broad-Based Categorical Eligibility' Supports Working Families and Those Saving for the Future. July 30 2019. Retrieved from <https://www.cbpp.org/research/food-assistance/snaps-broad-based-categorical-eligibility-supports-working-families-and>.

² Mathematica. Fiscal Year 2016 SNAP Quality Control sample. September 3 2019. Retrieved from <https://public.tableau.com/profile/mathematica#!/vizhome/ImpactofBBCEProposalonSNAPCaseLoads/BBCEDashboard>.

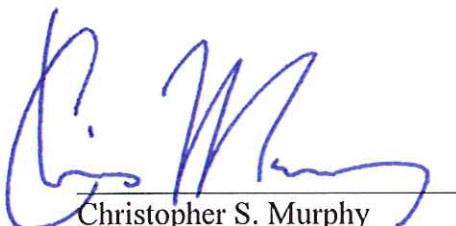
applicants must go through the regular SNAP benefit determination process in order to qualify and only about 0.2 percent of SNAP benefits go to households with disposable incomes above the federal poverty line.³

In addition, we are especially concerned about the impact the proposed rule will have on children. Approximately 30,685 SNAP recipients with children would lose their SNAP benefits under this change.⁴ As a result, these children—as well as a half a million children nationally—are at risk of losing Free and Reduced Price school meals. This outcome is deeply concerning as research has consistently shown that SNAP has a positive impact on children’s health, academic achievement, and long-term earning potential.

Finally, this rule makes SNAP more challenging for states like Connecticut to administer. By USDA’s own admission, implementing the rule will incur \$2.3 billion in administrative costs.⁵ This is in part due to a 25% higher program churn—which increases the administrative burden on states that have to process participants coming on and off the program with greater regularity. Furthermore, USDA failed to consider that this rule will impose new paperwork burdens on 69% of SNAP participants.⁶ Finally, since other federal programs like Temporary Assistance for Needy Families (TANF) and Medicaid still allow states to establish different income and asset test, states would not have the option of streamlining administrative work between these programs. Consequently, this change would have a disproportionate impact on the most vulnerable residents in Connecticut, those who already qualify for TANF and other benefits like Supplemental Security Income, childcare assistance, employment-support services, or Free and Reduced Price School Meals.

Not only is this proposal cruel and unnecessary, it also ignores Congressional intent. Congress rejected these type of changes when it passed both the *Agriculture Act of 2014* and the *Agricultural Improvement Act of 2018*. This rule will perpetuate the cycle of poverty for hundreds of thousands of Connecticut residents who are simply trying to put food on the table for their families.

Sincerely,



Christopher S. Murphy
United States Senator



Richard Blumenthal
United States Senator

³ ACT Center for Equity in Learning. “Creating Safe Schools: Examining Student Perceptions of Their Physical Safety at School.” August 2019. Retrieved from <https://www.act.org/content/act/en/research/reports/act-publications/school-safety-report.html>.

⁴ Mathematica. Fiscal Year 2016 SNAP Quality Control sample. September 3 2019. Retrieved from <https://public.tableau.com/profile/mathematica#!/vizhome/ImpactofBBCEProposalonSNAPCaseLoads/BBCEDashboard>.

⁵ Revision of Categorical Eligibility in SNAP Regulatory Impact Analysis. 7 CFR Part 273. July 24, 2019. <https://www.regulations.gov/document?D=FNS-2018-0037-0002>

⁶ Ibid.

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