

Congress of the United States

Washington, DC 20510

April 3, 2020

The Honorable Sonny Perdue
Secretary of Agriculture
United States Department of Agriculture
1400 Independence Avenue, SW
Washington, D.C. 20250

Dear Secretary Perdue,

We write to urge you to immediately rescind the SNAP Requirements for Able-Bodied Adults Without Dependents (ABAWD) Rule and halt the rulemaking process for the Revision of Categorical Eligibility Rule and the Revision of State Heating and Cooling Standard Utility Allowances (SUA) Rule. Your decision to continue to pursue these rules puts hundreds of thousands of people in Connecticut at risk of severe food insecurity during the ongoing coronavirus pandemic. In the midst of an unprecedented health and economic crisis, your department should not enact changes that make it harder for our constituents to access SNAP.

The St. Louis Fed estimates have noted that the coronavirus outbreak could cause the unemployment rate to reach 32 percent, and the economic fallout is likely to persist long after the initial wave of the outbreak has passed.¹ In the face of this economic catastrophe that will likely mean millions of Americans facing unemployment and financial hardship through no fault of their own, states will need the flexibility to waive work requirements for months into the future. We therefore urgently ask that you immediately rescind this rule.

In addition, we urge USDA to suspend work on finalizing the SNAP Revision of Categorical Eligibility Rule, which would bar the expansion of benefits to families living above 130 percent of the federal poverty line. This rule would force states to re-impose an asset limit test on most SNAP participants, at precisely the moment that the coronavirus emergency will require states to reduce red tape in getting assistance to families that need it urgently. Further, during this crisis, many families living above 130 percent of the federal poverty line will likely still struggle to put food on the table. It was estimated prior to the coronavirus outbreak that this rule would mean 57,000 Connecticut individuals would lose access to critical nutrition assistance, including over 30,000 SNAP recipients with children;² that number is likely to be higher in the wake of this crisis.

¹ St. Louis Fed, "Back-of-the-Envelope Estimates of Next Quarter's Unemployment Rate," March 24, 2020. Retrieved from <https://www.stlouisfed.org/on-the-economy/2020/march/back-envelope-estimates-next-quarters-unemployment-rate>.

² Mathematica. Fiscal Year 2016 SNAP Quality Control sample. September 3 2019. Retrieved from <https://public.tableau.com/profile/mathematica#1/vizhome/ImpactofBBCEProposalonSNAPCaseloads/BBCEDashboard>.

Finally, we urge USDA to suspend work on finalizing the SNAP Revision of State Heating and Cooling Standard Utility Allowances (SUA) Rule, which would set fixed utility costs for every state. If this rule is finalized, an estimated 45 percent of households in Connecticut would lose access to SNAP benefits, at a time when they are already worried about utility shutoffs and unaffordable utility bills.³ Instead, states should be able to continue to estimate how much residents spend on utilities and take that expense into account when determining eligibility for SNAP. This is especially important for high-energy cost states, like Connecticut, where customers spend a large portion of their income on heat and electricity.

At a bare minimum, USDA can no longer rely on their previous economic analysis for how many Americans will lose benefits, as employment numbers change by the days and hours. These cruel SNAP rules should be abandoned immediately in the face of this unprecedented health and economic crisis facing our country.

Sincerely,

Senator Christopher S. Murphy
Senator Richard Blumenthal
Representative Rosa L. DeLauro
Representative John B. Larson
Representative Joe Courtney
Representative James A. Himes
Representative Jahana Hayes

³ Supplemental Nutrition Assistance Program: Standardization of State Heating and Cooling Standard Utility Allowances, Regulatory Impact Analysis, 7 CFR Part 273, Federal Register, October 3, 2019.