



1000 Dean St., Suite 402
Brooklyn, NY 11238

September 13th, 2019

Re: Notice of Proposed Rulemaking -- Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP) RIN 0584-AE62

Dear SNAP Program Design Branch:

On behalf of Slow Food USA I appreciate the opportunity to comment on USDA's Notice of Proposed Rulemaking on a Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP). The proposed changes would cause serious harm to low income communities and the nation. The proposed rule should be withdrawn.

Slow Food USA is a national, not-for-profit organization dedicated to a food chain that is Good, Clean, and Fair for All, with Equity, Inclusion, and Justice at Every Link. We believe that all of us, and most particularly our children, have the right to ample, sustainably, and humanely produced, culturally meaningful, delicious food that is good for human health and wellbeing, the planet, and those who work to put food on our tables.

SNAP plays a critical role in addressing hunger and food insecurity in low income communities. SNAP benefits are so urgently needed by families that they are spent quickly — 97% of benefits are redeemed by the end of the month of issuance. It is the first line of defense against hunger for low-income residents.

SNAP plays a critical role in reaching key vulnerable populations. 78% of SNAP households include a child, an elderly person, or a person with disabilities. Research has found that receipt of SNAP in early childhood improved high school graduation rates, adult earnings, and adult health.

SNAP plays a critical role in bolstering local economies. Every federally funded SNAP dollar generates \$1.79 in economic activity, according to USDA research. SNAP lifted 3.6 million Americans out of poverty in 2016, according to the Census Bureau's Supplemental Poverty Measure. SNAP is nearly as effective as the Earned Income Tax Credit in lifting families above the poverty line, and far more effective than any other program in lifting families out of deep poverty.

SNAP plays a critical role in school meals. When children live in households that receive SNAP benefits they are directly certified (automatically eligible) to receive free school meals. This policy is called “Broad-Based Categorical Eligibility” (or “Cat El”) and has been in place for more than two decades. 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. Restricting SNAP categorical eligibility could cause about 265,000 students to lose eligibility for free school meals.

The proposed rule would eliminate SNAP benefits for 3.1 million individuals, take free school meals away from the children in those families, and punish people with even meager savings. 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.*”

Cat El policies have been in place for more than two decades. Congress rejected efforts to gut Cat El, including during its consideration of the 2005 budget reconciliation and the 2018 Farm Bill. This USDA rulemaking is an attempt to side step Congress and is outside USDA’s authority.

I strongly oppose the proposed rule that would cut food benefits for struggling people and harm our community.

Sincerely,

A handwritten signature in cursive script that reads "Anna Mulé".

Anna Mulé

Executive Director, Slow Food USA