



*Responsible Policy. Real Prosperity*

August 28, 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 -- Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP) RIN 0584-AE62

Dear SNAP Program Design Branch:

Thank you for the opportunity to comment on USDA's Notice of Proposed Rule Making on a Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP). The proposed changes would cause serious harm to those with food insecurity. The proposed rule should be withdrawn.

The Kansas Center for Economic Growth (KCEG) is a project of Kansas Action for Children, a nonprofit, nonpartisan organization. KCEG conducts research and analysis to promote balanced state policies that help ensure every Kansan prospers. Our mission is to advance responsible policies by informing public discussion through credible, fact-based materials. We serve policymakers, the media and every Kansan who wants to engage in making our state a place where opportunity and economic growth are widely shared.

As the nation's largest federal food assistance program, the Supplemental Nutrition Assistance Program (SNAP) is the first line of defense against food insecurity. SNAP works efficiently and effectively by providing low-income households with monthly funds specifically designated for food purchases. Research links participation in SNAP for 6 months with an 8.5 percentage point decrease in food insecurity in households with children.<sup>i</sup>

SNAP is a critically important resource for children given their higher prevalence of food insecurity and high rates of participation. In 2015, 19.2 million U.S. children utilized SNAP for access to consistent food, representing 44 percent of participants.<sup>ii</sup> In the last year of available data, 234,000 Kansans participated in the program or 8 percent of the Kansas population.<sup>iii</sup> Nearly three-fourths of



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Kansas SNAP participants are in families with children.<sup>iv</sup> However, 29 percent of eligible individuals in Kansas do not receive the benefit.

Beyond its role in fighting food insecurity, SNAP significantly reduces child poverty and helps struggling families to make ends meet: SNAP benefits lifted 1.5 million children out of poverty in 2017 alone.<sup>v</sup> The economic impact doesn't stop at the individual family. It is estimated that "in a weak economy, \$1 in SNAP benefits generates \$1.70 in economic activity."<sup>vi</sup> Nearly all (97 percent) of SNAP benefits are spent in the month they are received, with over half (59 percent) being spent in the first week, meaning SNAP funds are going back into the economy almost immediately.<sup>vii</sup>

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. The current policy option is known as "Broad-Based Categorical Eligibility" (or "Cat El").

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 2005 budget reconciliation and the 2018 Farm Bill. This USDA rulemaking is an attempt to side step Congress.

We strongly oppose the proposed changes that would cut food benefits. Taking food off the table is no way to help individuals achieve economic mobility.

Sincerely,

A handwritten signature in black ink that reads "Emily Fetsch". The signature is written in a cursive, flowing style.

Emily Fetsch  
Director of the Kansas Center for Economic Growth



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- <sup>i</sup> James Mabli, Jim Ohls, Lisa Dragoset, Laura Castner, and Betsy Santos, "Measuring the Effect of Supplemental Nutrition Assistance Program (SNAP) Participation on Food Security," U.S. Department of Agriculture Food and Nutrition Service, August 2013. <https://fns-prod.azureedge.net/sites/default/files/Measuring2013.pdf>
- <sup>ii</sup> Sarah Lauffer, "Characteristics of Supplemental Nutrition Assistance Program Households: Fiscal Year 2016," United States Department of Agriculture, November 2017, <https://fns-prod.azureedge.net/sites/default/files/ops/Characteristics2016.pdf>
- <sup>iii</sup> Nchako, Catlin and Lexin Cai. "A Closer Look at Who Benefits from SNAP: State-by State Fact Sheets (Kansas)." Center on Budget and Policy Priorities. December 3, 2018. <https://www.cbpp.org/research/food-assistance/a-closer-look-at-who-benefits-from-snap-state-by-state-fact-sheets#Kansas>
- <sup>iv</sup> Nchako, Catlin and Lexin Cai. "A Closer Look at Who Benefits from SNAP: State-by State Fact Sheets (Kansas)." Center on Budget and Policy Priorities. December 3, 2018. <https://www.cbpp.org/research/food-assistance/a-closer-look-at-who-benefits-from-snap-state-by-state-fact-sheets#Kansas>
- <sup>v</sup> Liana Fox, "The Supplemental Poverty Measure: 2017," U.S. Census Bureau, September 2018, <https://www.census.gov/content/dam/Census/library/publications/2017/demo/p60-261.pdf>
- <sup>vi</sup> Nchako, Catlin and Lexin Cai. "A Closer Look at Who Benefits from SNAP: State-by State Fact Sheets (Kansas)." Center on Budget and Policy Priorities. December 3, 2018. <https://www.cbpp.org/research/food-assistance/a-closer-look-at-who-benefits-from-snap-state-by-state-fact-sheets#Kansas>
- <sup>vii</sup> Center for Budget and Policy Priorities. "Chart Book: SNAP Helps Struggling Families Put Food on the Table." February 13, 2018. <https://www.cbpp.org/sites/default/files/atoms/files/3-13-12fa-chartbook.pdf>