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Submitted via www.regulations.gov

SNAP Certification Policy Branch
Program Development Division
Food and Nutrition Service
3101 Park Center Drive
U.S. Department of Agriculture
Alexandria, VA 22302


To Whom It May Concern:

I am writing on behalf of Prevention Institute to oppose the USDA’s proposed rule regarding Supplemental Assistance Nutrition Program (SNAP) Standardization of State Heating and Cooling Standard Utility Allowances. The USDA itself notes that the proposed rule would cause 19 percent of SNAP households to get lower SNAP monthly benefits, would disproportionately impact elderly people and people with disabilities, and would cause a national net cut to SNAP benefits amounting to $4.5 billion over five years.¹

As a national nonprofit organization dedicated to promoting health, safety, and wellbeing through thriving, equitable communities, Prevention Institute is strongly opposed to any programmatic changes that limit healthy food access or diminish anti-hunger assistance. The proposed rule would exacerbate the struggles many families face in paying for the costs of both food and utilities resulting in harmful impacts on health and wellbeing as well as on the economy.

Policymakers recognize that household resources needed to pay for basics such as shelter, utility costs and childcare are not available to purchase food. Under current law, SNAP considers the utility expenses of each SNAP household. States adjust household benefits based on a state-specific Standard Utility Allowance (SUA) calculated by the state and approved by USDA. The current policy allows variances in SUAs to accommodate for differences in utility costs and rates, and allows states flexibility in how they calculate those costs.

The proposed rule would standardize and cap SUA calculations across the country based on survey data. The proposed rule does not adequately explain USDA’s rationale for capping the largest of the SUA components by calibrating to utility expense survey data for those no higher than the 80th percentile of low-income people and then capping other SUA components as well. The proposed rule merely asserts that it calculated calibrating to the 50th percentile compared to the 80th percentile. The proposed rule does not adequately explain whether USDA analyzed impacts calibrated to the 85th or higher percentiles and what the results of those estimates were. The lack of such explanation is particularly concerning given research documented that 21 states had SUAs exceeding the 85th percentile estimates, possibly because in their efforts to mitigate benefit loss for households with very high utility costs.

¹ Source: USDA.
Prevention Institute is very concerned that this proposal, in conjunction with other pending proposals to restrict SNAP eligibility, would have a lasting and harmful impact on the physical and mental wellbeing of individuals and families that rely on SNAP assistance. Food insecurity—and even marginal food security—is especially detrimental to the health, development, and well-being of infants, children, and adolescents. SNAP plays a critical role in improving the food security, health, and wellbeing of program participants across the lifespan. Older adults and people with disabilities will also be disparately impacted by the proposed rule. SNAP plays an important role in supporting the food security, nutrition, and health of older adults, allowing them to maintain their independence while also reducing their healthcare utilization and costs. People with disabilities are at higher risk of food insecurity, making SNAP a critical support for this vulnerable population as well.

No one should have to choose between heating their home in below-freezing weather or buying healthy food. Rather than taking necessary food assistance away from households, we strongly urge you to advance policies to prevent food insecurity in the first place. Thank you for the opportunity to submit comments on the proposed rulemaking.

Sincerely,

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