



SENT VIA ELECTRONIC SUBMISSION

September 23, 2019

Program Design Branch
Program Development Division
U.S. Department of Agriculture, Food & Nutrition Service
3101 Park Center Drive
Alexandria, Virginia 22302

Re: *Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program*
[FNS-2018-0037, RIN 0584-AE62]

Dear Secretary Perdue and Administrator Lipps:

Thank you for the opportunity to comment on the United States Department of Agriculture's (USDA) proposed rule, Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP) (RIN 0584-AE62). This proposed revision to categorical eligibility (CE) would eliminate the ability for states, including Ohio, to participate in broad-based categorical eligibility, which streamlines program administration while ensuring SNAP benefits are targeted to the appropriate households.

Advocates for Ohio's Future (AOF) is a nonpartisan coalition of over 500 Ohio organizations that promotes health and human service budget and policy solutions so that all Ohioans live better lives. The coalition believes in investing in our state's most valuable resource—our people—to ensure that they are safe, healthy, and can afford life's basics.

Dozens of organizations, including many of our coalition members, have submitted comments in opposition to the proposed rule. As a coalition, we present the many concerns our member organizations have expressed. A list of AOF leadership is included in this submission. Our chief concerns are described briefly below.

Currently, more Ohio families are living in poverty since the last recession: 14% of the population, 44% more people than before the recession.¹ Unfortunately, according to our partners at Policy Matters Ohio, in 2018, six of Ohio's ten most common jobs (cashier, server, food prep, janitor, salesperson, stock person) paid wages so low that a family of three would need to use food assistance to make ends meet (less than \$26,000).² Twenty years ago (2000), only four of the most common jobs left working people in need of help to get by. This indicates that more working families than ever are turning to state and federal support services to make ends meet.

Access to SNAP Benefits Impacts Self-Sufficiency, Health Care Costs and Outcomes

Federal services for food, shelter and health care that are calibrated to federal poverty measures are of critical importance to population health. Good health, including adequate access to healthy food, is essential for maintaining a job, earning an education, parenting, and participating in community life. In Ohio, over 1.3

¹ http://oaca.org/wp-content/uploads/2019/06/2019-StateOfPoverty_spread_low.pdf

² <https://www.policymattersohio.org/research-policy/fair-economy/work-wages/minimum-wage/working-for-less-too-many-jobs-still-pay-too-little-2019>

million, or one in six people across the state rely on SNAP to help buy groceries each month.³ Though the average SNAP benefit in Ohio is only about \$4 per day per recipient, this assistance significantly reduces food insecurity and frees up recipients' limited incomes to address other hardships like paying bills and rent.⁴ Once a family or an individual achieves stability and their basic needs are met, SNAP becomes an important work support to maintain stability as individuals expand their education or look for a job.

Additionally, SNAP and proper nutrition impact overall health and help reduce health care costs. Food insecurity has direct health impacts, and increases the incidence of many common chronic conditions, including diabetes, obesity, hypertension, pregnancy complications, and depression. In order to cope with cost, food insecure households have been shown to ration medication, postpone or go without medical care, and avoid adhering to medically-necessary special diets.⁵ There are already existing health impacts when SNAP benefits run low—at the end of the month, hospital admissions for hypoglycemia (low blood sugar) spike in low-income populations that utilize SNAP benefits.⁶ In other words, food insecurity makes existing health issues worse, leading to increased severity of conditions and cost of treatment long-term.

Eliminating Categorical Eligibility Would Make it Harder for Households to Access Benefits and Increase Administrative Burdens

The Food and Nutrition Act of 2008 allowed for states to use CE for SNAP, meaning if a household meets eligibility requirements and participates in other government benefits, most notably Social Security Income (SSI) and Temporary Assistance for Needy Families (TANF), they are automatically granted SNAP eligibility without undergoing income or asset tests. Following the law's enactment, 43 jurisdictions, including Ohio, expanded this categorical eligibility to "broad-based categorical eligibility" (BBCE) so that low-income households may become automatically eligible for SNAP if they qualify for a non-cash TANF or state maintenance of effort (MOE) funded benefits.

States choose to participate in BBCE because it reduces administrative burden and allows them flexibility for SNAP eligibility so that low-income families whose gross household income is over the income threshold but have costs that consume a large share of their income, such as housing and childcare, could receive nutrition benefits. Additionally, this allows for a less prohibitive asset test so that families who own their cars or homes or maintain a modest savings account can remain eligible for food benefits and not be forced to spend down their savings or sell their assets.

Removal of BBCE would be inconsistent with state rules on other federal programs like TANF and Medicaid, adding costly administrative burdens to Ohio and local governments. A change would require expensive changes in information systems, training, and eligibility processing procedures. This change will also increase program "churn," where households move on and off the SNAP program within a short period, incurring financial and administrative costs for both the individuals and the state. Ohio is one of few states who run county-administered benefit programs where counties and local governments are responsible for administrative and supplemental costs. Customer service, program efficiency and program integrity suffer when local governments are forced to do more with less.

The Proposed Rule Would Have Disproportionate Impacts on the Most Vulnerable Populations

Millions of low-income people rely on the program to access a nutritious diet and approximately two-thirds of SNAP participants are children, elderly, or people with disabilities.

³ <http://jfs.ohio.gov/pams/Case-Load-Summary-Report--June-2019.stm>

⁴ <http://jfs.ohio.gov/pams/Case-Load-Summary-Report--June-2019.stm>

⁵ <https://frac.org/wp-content/uploads/hunger-health-role-snap-improving-health-well-being.pdf>

⁶ Seligman, H. K., Bolger, A. F., Guzman, D., López, A., & Bibbins-Domingo, K., Exhaustion of food budgets at month's end and hospital admissions for hypoglycemia. *Health Affairs*, 33(1), 116–123, (2014).

The inclusion of broad-based categorical eligibility in the SNAP program allows seniors and people with disabilities to build their savings. Under SNAP's existing broad-based categorical eligibility, states can raise the extremely-low asset limit of \$3,500 for seniors and people with disabilities.⁷ Without broad-based categorical eligibility, seniors and people with disabilities are penalized for building even small nest eggs and are also less capable of weathering unexpected emergencies. The proposed rule would make vulnerable populations less financially secure, and one unexpected emergency could have devastating consequences.

The existing program structure of SNAP helps address childhood hunger and its devastating impacts. SNAP participation is linked with better health for children throughout their life span, and also has positive impacts on their caregivers, including improved maternal health.⁸ Broad-based categorical eligibility also allows children to be automatically enrolled in free and reduced school lunch programs. While families would still qualify for free or reduced lunch with the elimination of broad-based categorical eligibility, the additional burden of qualifying for the separate program may be a deterrent for families, leaving more children in Ohio and across our nation hungry.

The SNAP program has a dramatic impact on improving the health of vulnerable populations. Broad-based categorical eligibility ensures the people who qualify for and are in need of food assistance are able to receive it without unnecessary administrative burdens. Eliminating this option for states will deny low-income families basic food assistance and limit their opportunities to establish self-sufficiency while increasing costs and administrative burdens for state and local governments.

Advocates for Ohio's Future strongly urges you to maintain broad-based categorical eligibility, recognizing the critical role food security plays in health and well-being for low-income families, older adults, and individuals with disabilities in Ohio.

Sincerely,

Leadership of Advocates for Ohio's Future

⁷ <https://www.cbpp.org/research/food-assistance/snaps-broad-based-categorical-eligibility-supports-working-families-and>

⁸ <https://childrenshealthwatch.org/wp-content/uploads/DoctorsRecommendSNAP-1.pdf>