



## COALITION ON HUMAN NEEDS

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November 1, 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); Reopening of Comment Period RIN 0584-AE62

Dear SNAP Program Design Branch:

On behalf of the Coalition on Human Needs, I am submitting additional comments specifically related to the U.S. Department of Agriculture's revised estimate of the impact on school meals' participation due to the proposed rule change related to Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP). Thank you for reopening the comment period in light of the dramatically different estimate.

The Coalition on Human Needs is an independent non-profit alliance of more than 100 national-scope organizations, which together reach millions of people nationwide. Our members include faith-based groups, human service providers, policy experts, labor and civil rights groups, and other advocates nationwide concerned about meeting the needs of low-income and vulnerable people. Many of our members directly work to reduce food insecurity and hunger; others recognize the importance of good nutrition for children's health and development, and success in school and life.

We were very concerned to see USDA's new analysis of the number of children expected to be moved from the free meals to reduced price meals category or to lose access to subsidized meals altogether because 545,000 households with school-aged children may no longer participate in SNAP under the Categorical Eligibility change proposed. The huge increase in the number of children who could lose free school meals (from about 500,000 to 982,000 children) should alone cause USDA to withdraw this proposed rule.

USDA contends that 445,000 of these children would be income eligible for free school breakfast and lunch even though they would lose automatic eligibility through loss of SNAP. While we do not contest this estimate, we wish to emphasize that there is a large body of evidence showing that when people are required to produce more documentation

and paperwork, there is always a considerable drop-off in participation. Quotes in the press suggesting that if parents really need the food for their children, they will submit the required documentation are irresponsibly ignorant of the outcomes when such requirements are made more onerous. One study by the Southern Governor's Association and the Southern Legislative Conference, reported on in [The New York Times](#) in 1988, found that of people denied cash assistance or Medicaid, 59.7 percent had problems with applications. When more proof of identity was proposed for voting in various locations, ample evidence showed that poor people were far less likely to have official documents such as birth certificates. Transportation to provide documentation, or access to the internet for online submissions are all more difficult for low income people. When Arkansas began its work documentation requirements for Medicaid, thousands of people who were judged to be eligible could not comply with the requirements and lost Medicaid. Many never received notifications from the state and did not know what they were required to do. When New Hampshire started a similar work requirement program, they aborted the program abruptly when very few people were reporting at all, again raising issues of proper notification and/or the ability of eligible people to comply. A federal court has ruled against such work requirements in Kentucky and elsewhere because of these problems.

This causes us to be extremely worried that many families expected to be eligible will not submit the proper paperwork, and their children will lose free meals despite the family's inability to provide the food their children need. They may not receive the notification that they must submit paperwork. They may fear loss of earnings or even loss of jobs from having to leave work to appear at school. Language barriers may increase lack of understanding of the new requirements.

USDA estimates that 497,000 of the 982,000 children affected by this change would no longer be eligible for free school meals but would qualify for the reduced price meals. Already, one in four school districts report unpaid school meals fees, sadly resulting in the "lunch shaming" that occurs when families owe money for school meals and the schools do not provide the child with the regular school meal or refuse to provide one at all. This suggests that food intake will suffer for a considerable number of the children shifted to the reduced price category. To the extent that low-income parents provide the money for their children's meals, other necessities may be shortchanged, from meals at home to utilities payments to rent.

USDA estimates in its revised analysis that 40,000 children would no longer be eligible for any school meals subsidy if the gutting of state options for Broad-Based Categorical Eligibility take place. Based on decades of experience, only a little cited above, we believe that the number of children who will lose all subsidies will be far higher, despite their families' very low incomes.

Another important impact when loss of SNAP benefits hits millions of people because of the Categorical Eligibility changes will be the expected reduction in the number of schools qualifying for free school meals under the Community Eligibility program. Under Community Eligibility, all children in a school are automatically given free meals

when a certain percentage of students are directly certified for free school meals, primarily because they are receiving SNAP. If fewer children are in families receiving SNAP benefits because of the proposed rule change, Community Eligibility will not apply and schools will receive fewer funds to operate their meals programs.

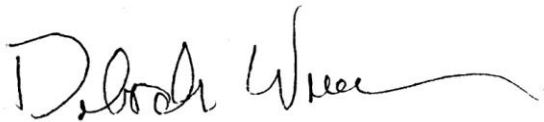
The last thing we should be doing is making it more difficult for children to receive good nutrition at school. The evidence is conclusive that children do better in school when they have eaten better. Some schools have learned not to give tests during the last week of the month, since that is when SNAP benefits have mostly run out for families utilizing them. This proposal will inflict a one-two punch on such families. They will lose SNAP, and that in turn will cause their children to lose school meals, or to divert already meager family income to pay for them.

The additional paperwork requirements will also impose a burden on schools having to process these forms, a cost we do not believe is adequately reflected in USDA's analysis of the proposed rule's impact.

Please withdraw this rule: the large increase in the number of children affected as shown in the belated analysis, added to the millions of people acknowledged to face losses in SNAP assistance, show that the rule will harm children and families. It is contrary to Congress' clear intent, and contrary to SNAP's purpose.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Deborah Weinstein". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Deborah Weinstein,  
Executive Director