

September 23, 2019

VIA ELECTRONIC MAIL

<http://www.regulations.gov>

Brandon Lipps
Administrator and Acting Deputy Undersecretary
Food and Nutrition Service
United States Department of Agriculture
3101 Park Center Drive
Alexandria, Virginia 22302

RE: Supplemental Nutrition Assistance Program: Requirements for Able-Bodied Adults Without Dependents; FNS-2018-0004

Dear Mr. Lipps,

On behalf of the Adventist Health Policy Association (AHPA), we appreciate the opportunity to comment on the United States Department of Agriculture (USDA) proposed amendment of regulatory standards within the Supplemental Nutrition Assistance Program (SNAP). Our organization is the policy voice of five Seventh-day Adventist affiliated health systems that include 89 hospitals and more than 300 other health facilities in 15 states. We represent a major segment of the U.S. hospital sector. Our member hospitals operate in a variety of settings, ranging from rural Appalachia to urban areas of California. With such diverse facilities, populations served and geographical locations, we strive to provide an objective and sound health policy voice on issues of community well-being.

Below, please find AHPA's comments on the proposed changes to categorical eligibility within SNAP. Specifically, we offer comments on the following areas of the proposal:

- Categorical Eligibility
- School Lunch Program Enrollment
- Workforce Participation

General Comments

AHPA sees great value in the work of the USDA through SNAP to provide nutrition assistance to low-income individuals and families. SNAP benefits help to eradicate poverty, promote self-sufficiency and bolster the economy. As the largest domestic hunger safety-net program, SNAP protects the health of millions of people in America. Enrollment in the program has been linked to healthier food choices, lower rates of chronic disease and the ability to participate in the American workforce.¹ In addition, the critical assistance that SNAP provides helps to reduce the \$77.5 billion of annual health care spending that results from food insecurity.² By its own estimates, the newly proposed rule anticipates cutting SNAP benefits for over three million enrollees—exacerbating food insecurity rates in our communities.

Categorical Eligibility

Broad-Based Categorical Eligibility (BBCE) allows more low-income families to qualify for SNAP despite having modest savings or a retirement income. Using BBCE, States can extend SNAP enrollment to households receiving help under the Temporary Assistance for Needy Families (TANF) or other aid programs, simplifying application processes and reducing administrative burden. BBCE also permits States to lift SNAP’s asset limits, allowing nutrition benefits to be extended to low-income families with modest savings. The USDA proposes to limit categorical eligibility to households that receive “ongoing and substantial” benefits, defined as follows:

- 1) Given for at least six, consecutive months;
- 2) Valued at a minimum of \$50 per month; and
- 3) Provide subsidized employment, work supports, or childcare benefits.

AHPA affirms BBCE as a powerful tool to protect an individual’s food security while incentivizing work. By allowing States to raise the gross income limit, working family members are able to accept modest wage increases without falling off the “fiscal cliff”—the sharp loss of assistance when an individual’s income rises, often temporarily, just above the federal income threshold. Over 40 States currently leverage BBCE to promote work, incentivize self-sufficiency and fight food insecurity.³ Low-income residents in these States are more likely to have modest savings or a bank account than their peers in other States.⁴

AHPA opposes limiting States’ ability to extend BBCE to families experiencing temporary but acute financial hardship. For many families, having to go without food assistance for longer than six months despite having demonstrated a financial need would be disastrous. For example, a family

¹ United States Department of Agriculture, [Introduction to the Supplemental Nutrition Assistance Program](#).

² Berkowitz, S., [Food Insecurity and Health Care Expenditures in the United States](#).

³ Center on Budget and Policy Priorities, [Over 40 States Use Broad-Based Categorical Eligibility](#).

⁴ Urban Institute, [The Unintended Consequences of SNAP Asset Limits](#).

receiving subsidized childcare through another program would have to wait *at least* six months before triggering BBCE. Placing excessively rigid limits on BBCE would make it significantly more difficult for States to provide temporary food assistance during natural disasters or State-specific crises, such as the closing of a major employer. For example, Florida has used BBCE to provide disaster-preparedness education and SNAP benefits to families who lost all their perishable food during a hurricane. State Administrators were able to help these low-income families who, making between 130-200 percent of the Federal Poverty Limit, would otherwise be ineligible for SNAP.

School Lunch Program Enrollment

The extension of SNAP benefits because of BBCE is linked to public schools' free lunch programs. Under current USDA policy, students who receive SNAP benefits through BBCE are certified to receive free meals. This helps to reduce administrative burden for States as well as additional paperwork for low-income families. Rolling back BBCE would require these families to complete an additional application in order for these children to continue to receive free school lunches.

AHPA opposes discontinuing the autoenrollment of schoolchildren receiving SNAP in free or subsidized school lunch programs. We believe that the added burden of completing multiple applications will compromise the nutrition of some of America's most vulnerable children. Inadequate nutrition in children has been linked to higher rates of chronic disease, cancers, depression and suicidal ideation.⁵ It is estimated that SNAP prevented roughly 7.3 million people from slipping into poverty in 2016, including about 3.3 million children.⁶ **If the Administration proceeds with the proposed limits on BBCE, AHPA recommends that the autoenrollment of low-income children in school lunch programs be preserved.**

Workforce Participation

AHPA believes that policies inhibiting access to SNAP benefits further disadvantage a struggling population. Limiting States' ability to use BBCE in extending SNAP benefits to low-income families will not help to promote self-sufficiency among enrollees. Rather, it would lead to individuals losing their benefits and, consequently, their ability to stay healthy and participate in the workforce.

AHPA instead recommends that the USDA bolster the SNAP Education and Training (E&T) program through additional funding. The E&T program helps SNAP participants gain skills, training and work experience to increase employability. AHPA believes this program can be an effective tool in assisting recipients' progression to self-sufficiency. The USDA could promote innovative approaches to

⁵ Garner, A., American Academy of Pediatrics: [Early Childhood Adversity, Toxic Stress, and the Role of the Pediatrician](#).

⁶ The Center on Budget and Policy Priorities. [The Supplemental Nutrition Assistance Program](#).

workforce development by tying E&T program funding to the implementation of identified best practices. Current research-based best practices include tailoring job training programs to community demographics and aligning E&T initiatives with local employment shortages.

Conclusion

AHPA commends the USDA for its efforts to improve SNAP and believes that policies to positively impact the program should focus on fighting food insecurity, promoting enrollment for qualified populations and combatting barriers to self-sufficiency. We welcome the opportunity to further discuss any of the comments above. If you have any questions, please do not hesitate to contact me at Carlyle.Walton@AdventistHealthPolicy.org or Julie Zaiback-Aldinger, Director of Public Policy and Community Benefit, at Julie.Zaiback@AdventHealth.com.

Sincerely,

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

Carlyle Walton, FACHE
President
Adventist Health Policy Association