November 26, 2019

SNAP Certification Policy Branch,

Program Development Division

Food and Nutrition Services

3101 Park Center Drive

U.S. Department of Agriculture

Alexandria, VA 22302

Re: Notice of Proposed Rule Making Regarding Supplemental Nutrition Assistance Program (SNAP) Standardization of State Heating and Cooling Standard Utility Allowances -- RIN 0584-AE69

Submitted via Regulations.gov

Dear SNAP Certification Policy Branch:

I am writing on behalf of RESULTS to comment on USDA’s Notice of Proposed Rule regarding Supplemental Assistance Nutrition Program (SNAP) Standardization of State Heating and Cooling Standard Utility Allowances. As an anti-poverty organization, we are deeply concerned that this proposal would exacerbate the struggles many low-income families have paying for costs of both food and utilities. According to the Department’s own estimates, the proposed rule would cut SNAP benefits by $4.5 billion over five years. The proposed rule is flawed and should be withdrawn.

RESULTS creates the public and political will to end poverty by empowering individuals to exercise their personal and political power for change. We support a network of more than 115 chapters with over 650 active volunteers (and an additional 7,000 members in our e-mail action network) across the U.S. Our grassroots educate members of congress, work with the media, and build awareness within their communities on basic nutrition and health programs along with budget and tax policies. Our grassroots network includes a specific focus on engaging young leaders and elevating the voices of low-income Americans who have firsthand experience of poverty.

**As an organization, we are concerned whenever Americans across the country are subject to harmful rule changes that put low-income individuals and their families at risk**. SNAP benefits provide our nation’s first line of defense against hunger and food insecurity. In particular, SNAP plays a critical role in addressing hunger and food insecurity in the communities of people of color. In 2015, SNAP lifted approximately 2.1 million Black people (including 1 million children) and an estimated 2.5 million Latinos (including 1.2 million children) out of poverty. Nearly three percent of Asian American and Pacific Islander (AAPI) families receive SNAP benefits, while many more are likely eligible but unenrolled due to cultural stigma and insufficient program outreach to AAPI groups.

Under current law, SNAP households’ expenditures for certain non-food basics, such as shelter, utility costs, and child care, in recognition that those spent resources are not available to pay for food. 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 lack of such explanation is particularly concerning given research documented that 21 states had SUAs exceeding the 85th percentile estimates, possibly because of their efforts to mitigate benefit loss for households with very high utility costs. [The Urban Institute estimates](https://www.urban.org/node/101368) that **aggregate SNAP benefits would decrease in 29 states** and 12 states would experience benefit declines of more than 5 percent. In addition**, households with member with a disability or an elderly person would be the most likely to be affected**-- the proposed change would reduce benefits for one in four households with a member with a disability, with an average reduction of $36 per month, and twenty-two percent of elderly households would experience an average benefit reduction of $38 per month.

This rule would affect communities of color across the nation, cutting SNAP benefits in over 3 million households. Utilities across the Nation differ greatly from the National average. For example, electricity costs in Fairbanks Alaska are 110 percent above the national average and in Honolulu Hawaii costs are 60 percent above the national average. The Residential Energy Consumption Survey found that nearly a third of the US population has trouble paying their utility bills. People of color represent a disproportionate amount of that population, with over half being black and 40 percent being Latino. The proposed rule would create another hurdle for people of color trying to exit poverty. Now, not only will folks struggle to pay their utility bills, but they will also struggle even more to put food on the table.

We know that many low-income workers are struggling to make ends meet, and this proposal would penalize also people who use basic needs programs to supplement their earnings from low-wage work. It would have harmful impacts on health and well-being as well as on the economy. The action can drastically impact the lives of low-income families making it harder to sustain themselves and afford food. **Our advocates know – many from lived experience – the importance of access to food assistance programs such as SNAP**.

Many RESULTS volunteers engaged policymakers to discuss the importance of SNAP in 2018 as Congress reauthorized the Farm Bill. Unfortunately, this USDA rulemaking is yet another attempt for the Administration to side step Congress and make cuts to SNAP benefits. Although the President’s FY 2019 Budget included a request for a change similar to the proposed rule [https://www.obpa.usda.gov/32fns2019notes.pdf], Congress did not include such a change in the 2018 Farm Bill. Indeed, evening out benefit amounts across states by lowering benefits for large numbers of participants does not promote SNAP’s statutory purpose, but instead undermines its statutory purpose.

USDA should be strengthening the positive impacts of SNAP for health, well-being and economic activity, not making cuts to SNAP benefits. As an organization deeply committed to ending poverty and creating opportunity that recognizes the links between oppression and poverty, **RESULTS strongly opposes the Administration’s plan to cap the Standard Utility Allowance** and request the USDA withdraw the rule and work with states to improve their SUA’s under existing flexibility.

Thank you for the opportunity to submit comments on the proposed rulemaking. Please do not hesitate to contact us to provide further information.

Sincerely,



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