



ZERO TO THREE
Early connections last a lifetime

September 23, 2019

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Food and Nutrition Service, USDA
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Re: Notice of Proposed Rulemaking: Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP)

Docket No: FNS-2018-0037

Dear Program Design Branch,

Thank you for the opportunity to comment on the United States Department of Agriculture's proposed rule on the revision of categorical eligibility in the Supplemental Nutrition Assistance Program (SNAP).

Founded more than 40 years ago, ZERO TO THREE is a national nonprofit organization located in Washington, DC, whose mission is to ensure that all babies and toddlers have a strong start in life. We translate the science of early childhood development into useful knowledge and strategies for parents, practitioners, and policymakers. We work to ensure that babies and toddlers benefit from the family and community connections critical to their well-being and healthy development. It is because of our focus on the well-being of all infants and toddlers that we are alarmed by the notice of proposed rulemaking to revise the categorical eligibility of SNAP.

SNAP plays a critical role in addressing childhood hunger and food insecurity in communities across the country and is the first line of defense against hunger for the majority of low-income infants, toddlers, and their families.ⁱ We adamantly oppose this proposed rule change as it would result in 3.1 million SNAP participants losing benefits in 2020,ⁱⁱ including 1.9 million children and their family members.ⁱⁱⁱ Rescinding states' decision-making ability to reach those in need of assistance as proposed in this rule change would result in millions of low-income families who struggle to make ends meet falling off a financial cliff and force them into poverty.

SNAP is a critical support for infants, toddlers, and their families.

Nutrition is a vital part of healthy development for both children and their families. Good nutrition improves young children's ability to grow and develop, while achieving and maintaining a healthy weight. Moreover, access to nutritious food for pregnant women provides both the mother and the child with the nutrients needed to stay healthy, active, and strong.

Without secured access to healthy food at the most critical period of brain development -- prenatally to age three -- children can develop serious health, behavior, and cognitive deficits.^{iv}

Unfortunately, food insecurity is far too common among families with young children. Nationally, more than 16 percent of households with infants and toddlers experience low or very low food security.^v Research shows that children living with food insecurity have poorer health than children who are in food-secure households.^{vi} Further, infants who experience food insecurity are more likely to have insecure attachment relationships, and to perform poorly on tests of cognitive development.^{vii} Nutrition programs like SNAP are proven to be effective in reducing food insecurity by helping low-income families afford healthy foods and providing information about nutrition, leading to stronger physical and emotional health.

Access to nutritious food is a basic necessity for all children and families, and SNAP supports more than 18 million children^{viii}, who make up more than 43 percent of the program's participants^{ix}, in their ability to count on groceries. By supporting families in purchasing food they would not otherwise be able to afford, SNAP effectively reduces food insecurity while also increasing healthy eating, and better health. SNAP has significant positive effects on health outcomes more broadly, especially for children. Women receiving nutrition assistance through SNAP also give birth to healthier babies, provide their babies with more nutritious diets, and implement healthier infant feeding practices.^x

SNAP benefits are inadequate for families as it is. One of the greatest shortcomings of SNAP is that benefits for most households are not enough to get through the entire month without facing hunger or being forced to sacrifice nutrition quality.^{xi} Multiple studies observe declines in caloric intake, diet quality, eating occasion frequency, and shopping frequency at the end of the monthly SNAP benefit cycle,^{xii} meaning that families are running out of, or are fearful of running out of, their benefits. Research clearly demonstrates the effectiveness of access to more adequate SNAP benefits -- not less -- in reducing poverty, food insecurity, and improving the health, nutrition, well-being, and economic security of families with young children.^{xiii}

Broad-based categorical eligibility in SNAP helps states support families.

Broad-based categorical eligibility (BBCE) allows states the flexibility to support more people through food assistance. This rule will make it exponentially harder for states to ensure families in their communities have access to nutritious food that helps them thrive. Through states' use of BBCE, families are better able to work, save money, and escape poverty. As such, the overwhelming majority of states—a total of 43—employing the use of BBCE have had the ability to expand eligibility to families earning between 130 and 200 percent of the federal poverty line. Because BBCE enables states to raise SNAP income eligibility limits somewhat, many more low-income working families that have difficulty making ends meet can receive help affording food to put on the table.^{xiv} BBCE also largely helps those working, but still living near poverty, allowing for the opportunity to save modest amounts of money in order to become more economically independent.^{xv} In other words, BBCE rewards work and helps families move toward real self-sufficiency, rather than pulling the rug out from under them just as they are finding their balance.

The costs associated with raising a family, like food, child care, and housing, are not optional expenditures, but basic needs. Meeting these needs is critical for families to have a solid base that enables them to be productive and support the work effort necessary to achieve economic security and mobility. Families relying on SNAP to purchase food, and therefore help meet a basic need on a tight budget, are at risk of falling deeper into poverty as a result of this proposed rule. Punishing families by eliminating states' abilities to help them address the high costs of raising a family in today's economy is cruel and would force millions of families living with young children to make impossible choices between their own health and economic security.

In addition to ensuring families with infants and toddlers access to healthy and nutritious food that they can count on, broad-based categorical eligibility helps states meet those needs in the following ways:

1. BBCE lowers administrative costs for states. States that adopt BBCE for enrollment in SNAP see administrative costs associated with enrollment drop by approximately 7 percent.^{xvi} Allowing states to adopt such a policy also helps states process SNAP applications in a timelier manner than without BBCE.^{xvii} BBCE, a streamlining process, allows for more families' needs to be met in a timelier fashion, using fewer state resources. By the USDA's own estimates, the proposed rule would increase SNAP administrative costs by over \$2 billion between 2019-2023.^{xviii}
2. BBCE removes cumbersome barriers to enrollment in SNAP for families. Families in states that have adopted BBCE face less of an administrative burden to accessing SNAP benefits, removing the duplicative nature of application processes and streamlining the process for busy families with young children. By the USDA's own admission, the proposed rule may negatively impact food security and reduce the savings rates among individuals who do not meet the income and resource eligibility requirements for SNAP or the substantial and ongoing requirements for expanded categorical eligibility. At a time when the Federal Reserve reports that 40 percent of households cannot cover a \$400 emergency expense^{xix}, it is counterproductive to eliminate a provision shown to help families save more than that amount^{xx}.
3. BBCE primarily helps households with high expenses and rewards work. More than 90 percent of the resulting benefits from the adoption of BBCE go to households whose rent or mortgage and utility costs exceeded half of their net income, and about 50 percent go to households that pay for dependent care for a child, or elderly or disabled household member.^{xxi} BBCE supports families struggling to pay the high costs of child care, housing, and other basic needs in two ways. First, BBCE allows states to take into account families' expenses when calculating their SNAP benefits. Second, BBCE smooths "benefits cliffs" for families with high expenses to ensure that when they get a raise, or work more hours, they are not punished by losing more benefits than the increase in earnings.
4. States' use of BBCE is not an automatic pathway to SNAP benefits. Finally, contrary to the language in this rule change, families must still apply and qualify for benefits through the regular application process and rules, including complying with any state-based compliance rules.

The benefits of allowing and encouraging states to continue and expand their use of BBCE as a tool to reach more families and help lift more families out of poverty should be the focus of this rule. Instead, as it stands, this rule change punishes hard working families, including many with young children, who are on the cusp of poverty. Further, it eliminates an area of state flexibility that states clearly find useful for meeting the needs of their people. We urge the Administration to reconsider this rule change and rescind it – and suggest that policymakers turn their attention to ensuring that SNAP is funded in a way that reaches families that need it, lifting families and communities towards more economic security and mobility. The only action that we encourage USDA to take with respect to this notice of proposed rulemaking is to rescind it, thereby better safeguarding the principles of the Supplemental Nutrition Assistance Program and reaching more families in need of support. Using decades of sound child development research as our guide, we know that this rule will cause harm to hard working families and their children, resulting in millions of more food insecure households across our nation. Instead of punishing families, we must support them as they navigate one of the most challenging and critical periods of their lives – raising their children.

Sincerely,



Myra Jones-Taylor, Ph.D.
Chief Policy Officer, ZERO TO THREE

ⁱ Mabli, J., Ohls, J., Dragoset, L., Castner, L., & Santos, B. (2013, August). Measuring the Effect of Supplemental Nutrition Assistance Program (SNAP) Participation on Food Security. Retrieved from <https://fns-prod.azureedge.net/sites/default/files/Measuring2013.pdf>

ⁱⁱ Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP), 84 FR 35570 (proposed July 24th 2019), to be codified at 7 CFR part 273, 35575

ⁱⁱⁱ Ibid.

^{iv} Rose-Jacobs, R., Black, M. M., Casey P. H., et al. (2008). Household food insecurity: Associations with at-risk infant and toddler development. *Pediatrics*, 121(1), 65–72.

^v Keating, K., Daily, S., Cole, P., Murphey, D., Pina, G., Ryberg, R., Moron, L., & Laurore, J. (2019). *State of babies yearbook: 2019*. Washington, DC: ZERO TO THREE and Bethesda MD: Child Trends. Retrieved from https://stateofbabies.org/wp-content/uploads/2019/05/State-of-Babies-Yearbook_full-digital-yearbook_5.14.19.pdf

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- ^{vi} Coleman-Jensen, A., McFall, W., & Nord, M. (2013). Food insecurity in households with children: Prevalence, severity, and household characteristics, 2010-11. U.S. Department of Agriculture, Economic Research Service. Retrieved from https://www.ers.usda.gov/webdocs/publications/eib113/37672_eib-113.pdf
- ^{vii} Zaslow, M., Bronte-Tinkew, J., Capps, R., Horowitz, A., Moore, K. A., & Weinstein, D. (2009). Food security during infancy: Implications for attachment and mental proficiency in toddlerhood. *Maternal and Child Health Journal*, 13, 66–80.
- ^{viii} U.S. Department of Agriculture. (2017). Characteristics of Supplemental Nutrition Assistance Program Households: Fiscal Year 2016. Retrieved from <https://www.fns.usda.gov/snap/characteristics-supplemental-nutrition-assistance-program-households-fiscal-year-2016>
- ^{ix} Ibid.
- ^x Schmit, S., Ullrich, R., Cole, P., & Gebhard, B. (2017). Nutrition Assistance: A critical support for infants, toddlers, and families. Retrieved from <https://www.zerotothree.org/resources/2087-nutrition-assistance-a-critical-support-for-infants-toddlers-and-families>
- ^{xi} Food Research & Action Center. (2019). Supplemental Nutrition Assistance Program: Initiatives to Make SNAP Benefits More Adequate Significantly Improve Food Security, Nutrition, and Health. Retrieved from <https://frac.org/research/resource-library/supplemental-nutrition-assistance-program-initiatives-to-make-snap-benefits-more-adequate-significantly-improve-food-security-nutrition-and-health>
- ^{xii} Ibid.
- ^{xiii} Schmit, S., Ullrich, R., Cole, P., & Gebhard, B. (2017). Nutrition Assistance: A critical support for infants, toddlers, and families. Retrieved from <https://www.zerotothree.org/resources/2087-nutrition-assistance-a-critical-support-for-infants-toddlers-and-families>
- ^{xiv} Rossenbaum, D. (2019). SNAP's 'Broad-Based Categorical Eligibility' Supports Working Families and Those Saving for the Future. Retrieved from <https://www.cbpp.org/research/food-assistance/snaps-broad-based-categorical-eligibility-supports-working-families-and>
- ^{xv} Ibid.
- ^{xvi} Gilkesson, P. (2019). Latest Rule Would Decrease SNAP Access and Increase Administrative Costs. Retrieved from <https://www.clasp.org/blog/latest-rule-would-decrease-snap-access-and-increase-administrative-costs>
- ^{xvii} Ibid.
- ^{xviii} Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP), 84 FR 35570 (proposed July 24th 2019), to be codified at 7 CFR part 273, 35575
- ^{xix} Board of Governors of the Federal Reserve System. (2018). Report on the Economic Well-Being of U.S. Households in 2017. Retrieved from <https://www.federalreserve.gov/publications/files/2017-report-economic-well-being-us-households-201805.pdf>
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- ^{xxi} Based on CBPP analysis of the fiscal year 2017 SNAP household characteristics data. These figures are for an average month of the fiscal year for households that would be ineligible of the aspect of BBCE that allows states to raise their income limits were eliminated; they do not include the effect of the aspect that allows states to lift their asset tests.