



September 23, 2019

Submitted online via www.regulations.gov

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) RIN 0584-AE62

Thank you for the opportunity to comment on USDA's Notice of Proposed Rule Making on a Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP). This proposal would reduce states' options to eliminate SNAP asset tests and their ability to use higher income tests that allow the SNAP program to serve more working households, particularly those that have significant expenses for shelter and child care. This proposal would end SNAP benefits for an estimated 3.1 million individuals.

The National Health Care for the Homeless Council is a membership organization representing federally qualified health centers and other organizations providing health care to people experiencing homelessness. Our members offer a wide range of services including comprehensive primary care, mental health and addiction treatment, medical respite care, supportive services in housing, case management, outreach, and health education. As an organization committed to ending homelessness and alleviating its consequences, we firmly believe in the human right to housing, health care, and adequate food. We work every day to help our patients access these services so they can meet their basic needs and escape homelessness. **We are strongly opposed to this proposed rule and urge the Administration to withdraw it from consideration. We believe these changes will perpetuate poverty and homelessness, negatively impact health outcomes, and violate human rights.**

The proposed rule would perpetuate poverty and homelessness.

This proposed rule would essentially reduce a states' ability to use "broad-based categorical eligibility" (BBCE) to raise eligibility limits for SNAP so that more low-income working families can receive assistance. While the U.S. Department of Housing and Urban Development estimates that about 1.5 million people experience homelessness over the course of the year, an additional eight million households spend more than half their income on rent and many others are doubled up because they can't afford a home of their own. In the 40 states that currently use less restrictive

income and asset tests for SNAP through BBCE, more low-income people who struggle to afford food are able to receive benefits. The ability for states to raise income eligibility for SNAP gives greater support for families at the brink of poverty and homelessness as they struggle to make ends meet while facing growing financial stressors such as rent, medical expenses, and child care. SNAP benefits have been proven to reduce poverty, help keep tenuously housed families more stably housed, and allow those experiencing homelessness a greater ability to find and maintain housing rather than spend time searching for food.

The proposed rule would have a dangerous impact on health outcomes.

The health implications of this rule are very concerning. Food insecurity has a direct impact on physical and mental health for people of all income levels and ages. As health care providers for people experiencing homelessness, we are always concerned about our patients' ability to access a healthy and adequate food supply. People experiencing homelessness face higher rates of diabetes, hypertension, cardiovascular disease, and mental health and addiction. It is well-established in research that a healthy diet is critical to preventing and/or managing these health conditions. Other sources of food for our patients--such as soup kitchens--are often underfunded and unable to provide fresh vegetables and fruits, whole grains, and other healthy options. We are not surprised when our patients end up hospitalized or in the emergency room because of high blood sugar and high blood pressure due to the poor food choices they have. SNAP benefits are vital to supplementing limited food options and allow us to better work with our patients on their health needs.

The proposed rule is an illogical and inconsistent departure from human rights.

Given the Administration's previously stated respect for state autonomy, this proposed rule is starkly inconsistent with allowing states to make decisions and tailor programs to their own needs. Furthermore, the USDA concedes that "The proposed rule may also negatively impact food security and reduce the savings rates among those individuals who do not meet the income and resource eligibility requirements for SNAP." It is unconscionable that the Administration would move forward with a proposal while acknowledging that it would negatively impact food security, when the express purpose of the SNAP program is to end hunger. A fair and just society provides for basic human needs and does not subject the most vulnerable citizens to hunger and poverty.

In conclusion, access to food assistance is critical to maintaining health and stability and we see significant improvements in health outcomes when our clients are able to access benefits through SNAP. This proposal will also perpetuate homelessness and create true hardship for vulnerable people. We stand alongside many other organizations in adamant opposition to this proposed rule and strongly urge for it to be withdrawn for consideration. If you would like to discuss these comments further, please contact Barbara DiPietro, PhD, Senior Director of policy at bdipietro@nhchc.org or 443-703-1346.

Sincerely,



G. Robert Watts
CEO