



November 19, 2019

Certification Policy Branch, Program Development Division
Food and Nutrition Service, FNS Room 812
3101 Park Center Drive
Alexandria, Virginia 22302

RE: Proposed Rule: Supplemental Nutrition Assistance Program: Standardization of State Heating and Cooling Standard Utility Allowances

To Whom It May Concern:

As a non-profit, non-partisan organization that promotes optimal health for every person and community, Trust for America's Health (TFAH) strongly supports the critical assistance that the Supplemental Nutrition Assistance Program (SNAP) provides to combat hunger and improve nutrition among Americans. Because healthy food is essential to good health and wellbeing, we strongly oppose any changes to the program that would limit access to benefits or deny individuals anti-hunger assistance.

The United States Department of Agriculture (USDA) recognizes that household resources needed to pay for basic necessities, such as housing, utility costs, and childcare, can lead many families to have inadequate or no resources available to purchase food. The USDA has historically allowed states to grant individuals standard utility allowances (SUAs) to account for variations in climates and utility usage. Rather than requiring individuals on SNAP to report their exact costs for heating, cooling, electricity, and trash collection, states have provided the USDA with estimates of these costs, a methodology that has existed for decades. The USDA's most recent proposal to modify the program would change the approach for setting SUAs, particularly the Heating and Cooling Standard Utility Allowance (HCSUA), which is the largest component of SUAs that directly affect the size of benefits that each SNAP household recipient receives. USDA's proposed rule would transfer authority for calculating these HCSUAs from the states, who better understand how utility expenses vary across communities, to the federal government, which would simply set the allowance at the 80th percentile of low-income households' utility costs in each state.

The USDA acknowledges that this change would cut SNAP funds by \$4.5 billion over five years, reducing monthly benefits for roughly 19 percent of households, particularly for those in northern states with colder climates.¹ An estimated 8,000 households would lose SNAP benefits

¹ Supplemental Nutrition Assistance Program: Standardization of State Heating and Cooling Standard Utility Allowances (0584-AE69). United States Department of Agriculture Food and Nutrition Service. October 3, 2019. Available at <https://www.federalregister.gov/documents/2019/10/03/2019-21287/supplemental-nutrition-assistance-program-standardization-of-state-heating-and-cooling-standard>.



entirely.² It is estimated that close to 68 percent of those impacted would be households with children, many of whom may be already at risk of losing SNAP benefits and free school meals as a result of previous proposed rules.^{3,4} Additionally, 20 percent of households affected would include seniors and 29 percent would include people with disabilities. Both populations are disproportionately at risk for poor health outcomes caused by extreme weather such as heat waves, and who may live in housing that is not suitably equipped to handle temperature or weather extremes.^{5,6} Meanwhile, 1.4 million veterans live in SNAP households,⁷ and 666,000 veterans live in low-income households that pay over 50 percent of their incomes in rent and utilities,⁸ leaving many of those who served our nation at risk from this and other proposed SNAP cuts.

Proposed changes to SUAs will be particularly harmful to people living in specific states. According to USDA's own regulatory impact analysis, there is concern about how the rule would create disparities between states.⁹ Vermont is the state with the largest projected impact as a result of the proposed rule, with a 21 percent decrease in net benefits across 61 percent of SNAP households¹⁰; the 3,000 veterans in the state receiving SNAP will likely be among those impacted.¹¹

TFAH is concerned that this proposal, in conjunction with other pending proposals to change SNAP eligibility requirements and rules, would have a negative net effect on our nation's food security and health. Food insecurity has direct and indirect impacts on physical and mental

² *Id.*

³ The Proposed USDA Rule Field Call for Net Loss in Benefits States: Understanding the Rule and Taking Action. [PowerPoint slides]. Center on Budget and Policy Priorities, Food Research & Action Center, Center for American Progress, Feeding America. October 22, 2019.

⁴ Fadulu, L. Trump Administration Unveils More Cuts to Food Stamp Program. The New York Times. October 4, 2019. Available at <https://www.nytimes.com/2019/10/04/us/politics/trump-food-stamp-cuts.html>.

⁵ The Proposed USDA Rule Field Call for Net Loss in Benefits States: Understanding the Rule and Taking Action. [PowerPoint slides]. Center on Budget and Policy Priorities, Food Research & Action Center, Center for American Progress, Feeding America. October 22, 2019.

⁶ *Id.*

⁷ Center for Budget and Policy Priorities, "SNAP Helps Almost 1.4 Million Low-Income Veterans, Including Thousands in Every State" (Nov, 8, 2018). Available at <https://www.cbpp.org/research/food-assistance/snap-helps-almost-14-million-low-income-veterans-including-thousands-in>

⁸ Fischer W. Rental Assistance Shortage Leaves 7000,000 Veterans Homeless or Struggling to Afford Housing. Center on Budget and Policy Priorities. November 7, 2019. Available at <https://www.cbpp.org/blog/rental-assistance-shortage-leaves-700000-veterans-homeless-or-struggling-to-afford-housing>

⁹ Regulatory Impact Analysis. 7 CFR Part 273: Supplemental Nutrition Assistance Program: Standardization of State Heating and Cooling Standard Utility Allowances. United States Department of Agriculture. October 3, 2019. Available at <https://www.regulations.gov/document?D=FNS-2019-0009-0002>

¹⁰ Regulatory Impact Analysis. 7 CFR Part 273: Supplemental Nutrition Assistance Program: Standardization of State Heating and Cooling Standard Utility Allowances. United States Department of Agriculture. October 3, 2019. Available at <https://www.regulations.gov/document?D=FNS-2019-0009-0002>

¹¹ Keith-Jennings B, Cai L. SNAP Helps Almost 1.4 Million Low-Income Veterans, Including Thousands in Every State. Center on Budget and Policy Priorities. November 8, 2018. Available at <https://www.cbpp.org/research/food-assistance/snap-helps-almost-14-million-low-income-veterans-including-thousands-in>.

health for people of all ages, and is especially important to the health, development, and well-being of infants, children, and adolescents. SNAP plays a critical role in improving the food security, health, and well-being of program participants across the lifespan and has been shown to reduce premature mortality.¹² Although USDA notes that these changes are intended to improve program “integrity,” no evidence has been presented in the proposed rule that justifies these significant cuts and benefits loss.¹³

While TFAH supports the proposal to include internet services when accounting for utility expenses, potentially increasing benefits to some individuals, we believe that the majority of the proposed changes would result in disastrous economic and health impacts to these low-income households who depend on SNAP benefits. No one should have to choose between heating their home in below-freezing weather or buying healthy food.

Thank you for your consideration of these comments. If you have any questions, please do not hesitate to contact Daphne Delgado, TFAH Senior Manager of Government Relations, ddelgado@tfah.org.

Sincerely,



John Auerbach
President & CEO
Trust for America’s Health

¹² Heflin CM, Ingram SJ, Ziliak JP. The Effect of the Supplemental Nutrition Assistance Program on Mortality. *Health Affairs*. November 2019. 38:11, 1807-1815. Available at <https://doi.org/10.1377/hlthaff.2019.00405>.

¹³ Supplemental Nutrition Assistance Program: Standardization of State Heating and Cooling Standard Utility Allowances (0584-AE69). United States Department of Agriculture Food and Nutrition Service. October 3, 2019. Available at <https://www.federalregister.gov/documents/2019/10/03/2019-21287/supplemental-nutrition-assistance-program-standardization-of-state-heating-and-cooling-standard>.