



Lutheran
Services
in America

November 25, 2019

SNAP Certification Policy Branch,
Program Development Division
Food and Nutrition Services
FNS
3101 Park Center Drive
Room 812
U.S. Department of Agriculture
Alexandria, VA 22302

Dear SNAP Certification Policy Branch:

As President and CEO of Lutheran Services in America, I write to offer comments on the Department of Agriculture's Proposed Rule -- Supplemental Nutrition Assistance Program: Standardization of State Heating and Cooling Standard Utility Allowances (RIN 0584-AE69). We urge you not to implement this rule that will take away food assistance from vulnerable Americans.

For context, Lutheran Services in America leads one of the largest health and human services networks in the U.S., made up of over 300 Lutheran social ministry organizations that operate with over \$22 billion in annual revenue. Efforts of the dedicated people who make up our national network help improve the lives of one in 50 Americans each year. Guided by God's call to love and serve our neighbors, we empower our faith-based member organizations in their mission to lift up the nation's most vulnerable people. In providing services to seniors, children and people with disabilities, along with veterans, refugees and the homeless, our members work in 1,400 communities throughout the country—in rural and urban areas—as shown on this map: http://bit.ly/LSA_member_map.

Administered by the Department of Agriculture (USDA), the Supplemental Nutrition Assistance Program (SNAP), also known as food stamps, provides food-purchasing assistance for low- and no-income people. It is a federal aid program, although benefits are distributed by each U.S. state's Division of Social Services or Children and Family Services. Roughly 40 million Americans in 2018 received SNAP benefits. Approximately



9.2% of American households obtained SNAP benefits at some point during 2017, with approximately 16.7% of all children living in households with SNAP benefits.¹

In addition to its critical role in reducing hunger, food insecurity, and poverty, SNAP is also a critical health intervention and support for low-income individuals and families. Research shows that food insecurity increases the risk of negative physical and mental health outcomes. In fact, research by the USDA has shown that people with food insecurity have an increased likelihood of developing chronic illnesses.² In addition, people with disabilities and their families are more likely to experience food insecurity than their nondisabled peers.³ SNAP decreases food insecurity and is associated with decreased health care costs and improved physical and mental health. Children receiving SNAP are automatically eligible for free school meals through a direct certification process without their family having to complete a separate application. This helps children succeed at school, as hungry children cannot focus on learning.

Because policymakers recognize that household resources needed to pay for necessities such as shelter, utility bills, and childcare are not available to purchase food, under current law SNAP takes into account the utility expenses of each eligible household when benefits are calculated. States adjust household benefits based on a state-specific Standard Utility Allowance (SUA) calculated by the state and approved by USDA. The largest component of this calculation is the Heating and Cooling Standard Utility Allowances (HCSUA). States set their own HCSUA that reflects the needs of the state and the variations in utility bills within a state. 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.

USDA has now proposed a rule to apply a less adequate assessment of SNAP households' utility costs that in turn would lower substantially the SNAP benefit

¹ Tara Watson, *SNAP Benefits and the Government Shutdown*, ECONOFACT (January 23, 2019), <https://econofact.org/snap-benefits-and-the-government-shutdown>.

² Gregory, Christian A. and Coleman-Jensen, Alisha (2017). Food Insecurity, Chronic Disease, and Health Among Working-Age Adults with Disabilities. U.S. Department of Agriculture, Economic Research Service. <https://www.ers.usda.gov/webdocs/publications/84467/err-235.pdf?v=42942>

³ See *id.* See also, Parish, Susan L. et al (2015). Food Insecurity among US Children with Disabilities. Presentation at the National Association for Welfare Research and Statistics Annual Workshop, Atlanta, GA. <http://nawrs.org/wp-content/uploads/2015/09/2C-Parish-Food-Insecurity.pdf>; Strickhouser, Sara, Wright, James D., and Donley, Amy M. (2015) Food Insecurity Among Older Adults. AARP Foundation, Washington, DC. https://www.aarp.org/content/dam/aarp/aarp_foundation/2015-PDFs/AF-Food-Insecurity-2015Update-Final-Report.pdf. See Table 2, p. 28 for food security rates by disability status (employment-related).



amounts for which households qualify in many states. The proposal would implement a new national methodology to calculate HCSUA, standardizing and capping calculations across the country based on survey data and curtailing state flexibility. Further, although SUAs have historically been set at levels high enough to capture expenses experienced by almost all SNAP households, the new methodology would calibrate the calculation of the SUA to utility costs for people with very low incomes, at the 80th percentile. This is lower than existing SUAs in over two-fifths of states, but USDA has not provided an explanation for this significant proposed change.

These changes to the SUA would exacerbate the struggles many SNAP households have in affording both food and utilities. According to USDA's own Regulatory Impact Analysis on this proposed rule, it would cut \$4.5 billion from SNAP over five years and cause 19% of SNAP households to receive lower monthly benefits. Seven million people in three million households would be impacted.

If finalized, this proposed regulation would make it harder for people to put food on the table by taking away SNAP benefits from many of the vulnerable people Lutheran Services in America member organizations serve. Given that national nutrition programs provide more than 10 times more food assistance than private nonprofits, these organizations will not be able to make up the gap left by cutting SNAP benefits, leaving millions of the working poor hungry with no place to turn. Only when nonprofit and federal programs work hand-in-hand can we begin to end the problem of the one in eight Americans who live at risk of hunger.

We urge the Administration to reconsider this rule change and ensure that United States laws, processes and resources support much-needed food assistance for all those in need.

Respectfully,

A handwritten signature in black ink that reads "Charlotte Haberaecker".

Charlotte Haberaecker
President and CEO