

August 28, 2019

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

Dear SNAP Program Design Branch:

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). The proposed changes would cause serious harm to children and the nation. The proposed rule should be withdrawn.

Kansas Action for Children (KAC) is a nonprofit, nonpartisan organization committed to improving the lives of Kansas children and families by providing comprehensive data, advocating for sound public policy, and collaborating with lawmakers.

Food insecurity remains a major threat to health and wellbeing of 12.5 million children in America.ⁱ This means that in 2017, one in six children lived in a household that had uncertain access to enough healthy food. In 2017, 18.3 percent of Kansas children under age 18 lived in food insecure households.ⁱⁱ That's more than 130,000 Kansas children without a dependable source of food.

Food insecurity has devastating consequences for children. Without access to healthy food, children suffer negative consequences to their health, education, and development. Research shows that nutrition is one of the, if not the most, critical environmental influences on a developing infant and child.ⁱⁱⁱ Beginning with the maternal diet during pregnancy, proper nutrition is crucial for healthy brain development. As Dr. Claire McCarthy writes on the Harvard Health Blog:

"The ways that the brain develops during pregnancy and during the first two years of life are like scaffolding: they literally define how the brain will work for the rest of a person's life. Nerves grow and connect and get covered with myelin, creating the systems that decide how a child — and the adult she becomes — thinks and feels. Those connections and changes affect sensory systems, learning, memory, attention, processing speed, the ability to control impulses and mood, and even the ability to multitask or plan."^{iv}

Nutrient-rich diets for both the mother (when pregnant or breastfeeding) and child promote normal brain development. While every family wants to be able to provide healthy and fresh food for their youngest members, many families in Kansas struggle with food insecurity. When children don't have access to the nutrition their developing minds and bodies need, they are at greater risk for obesity and other long-term health problems. Hungry kids are also more likely to repeat a grade in

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elementary school, experience developmental impairments in areas such as language and motor skills, and have more social and behavioral problems.^v

The proposed rule would gut states' options to eliminate SNAP asset tests and use a higher income test to serve more working households that have significant expenses for shelter and child care. The current policy option is known as "Broad-Based Categorical Eligibility" (or "Cat EI").

The proposed rule would eliminate SNAP benefits for 3.1 million individuals, take free school meals away from the children in those families, and punish people with even meager savings. By USDA's own estimates, the proposed rule would cut SNAP benefits over five years by \$10.543 billion, while increasing SNAP administrative costs by \$2.314 billion. Furthermore, USDA concedes, "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 or the substantial and ongoing requirements for expanded categorical eligibility."

Cat EI policies have been in place for more than two decades. Congress rejected efforts to gut Cat EI, including during its consideration of 2005 budget reconciliation and the 2018 Farm Bill. This USDA rulemaking is an attempt to side step Congress.

Imposing further limitations on SNAP benefits will harm children and families. No child should go hungry. No family should wonder where the next meal is coming from. The brain development that happens in early childhood is the foundation for lifelong learning. But without proper nutrition, that development is stymied.

We strongly oppose the proposed changes that would cut food benefits for children in need of affordable food.

Sincerely,



Annie McKay
President & CEO

ⁱ Alisha Coleman-Jensen, Matthew P. Rabbitt, Christian A. Gregory, and Anita Singh, "Household Food Insecurity in the United States in 2017," U.S. Department of Agriculture, September 2018, <https://www.ers.usda.gov/webdocs/publications/90023/err-256.pdf?v=0>

ⁱⁱ KIDS COUNT Data Center. Food Insecurity. Annie E. Casey Foundation. Original Data Source: Data Source: Feeding America: Map the Meal Gap. <https://datacenter.kidscount.org/data/tables/10238-food-insecurity?loc=18&loct=2#detailed/2/any/false/870,573,869,36/any/19818>

ⁱⁱⁱ The Urban Child Institute. "Nutrition and Early Brain Development." March 25, 2011. <http://www.urbanchildinstitute.org/articles/updates/nutrition-and-early-brain-development>

^{iv} McCarthy, Dr. Claire. "The crucial brain foods all children need." Harvard Health Publishing, Harvard Medical School. January 23, 2018. <https://www.health.harvard.edu/blog/brain-food-children-nutrition-2018012313168>

^v Feeding America. "Hunger deprives our kids of more than just food." <https://www.feedingamerica.org/hunger-in-america/child-hunger-facts>

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