

## **NWA Template Comments on Categorical Eligibility in SNAP**

**Comment Period Closes: Monday, November 1, 2019**

Thank you for taking the time to submit a comment to USDA's Food and Nutrition Service (FNS) regarding proposed changes to categorical eligibility in SNAP. Below are template comments that will help you weigh in on the latest proposal that could impact WIC families. **Comments must be submitted [here](#) by November 1, 2019.**

In SNAP, broad-based categorical eligibility (BBCE) is a streamlining option that empowers states to enhance access to nutrition support. BBCE permits states to waive income and asset tests at SNAP certification if that individual is also participating in a TANF-funded program, including non-cash assistance. As a result, BBCE permits states to extend income eligibility for SNAP beyond the federal minimum. Notably, BBCE also includes a provision to automatically certify children in SNAP households in free school meals.

The proposed rule would significantly reduce SNAP access by limiting the types of TANF-funded programs that could confer categorical eligibility. USDA's own estimates suggest that more than 3 million individuals would lose access to SNAP as a result of the proposed changes.

***If you commented during the earlier comment period (July – September 2019), you can still comment during this period.*** USDA reopened the comment period in mid-October after [amending the Regulatory Impact Analysis](#) to include statistics on the impact to school meals programs. Twice as many families will be impacted than what was originally estimated.

If you are experiencing difficulty in forming or submitting your comment, please contact Brian Dittmeier for assistance at [bdittmeier@nwica.org](mailto:bdittmeier@nwica.org).

As you prepare your comments, please:

- **Write comments in your own words.** FNS must review every unique comment; therefore, it is helpful if you modify the template language to include your own thoughts and perspectives. The template **highlights in yellow** particular opportunities to add your own thoughts. You are encouraged to modify the template language to reflect your own voice.
- **Attach research, data, testimonials, or other supporting documents.** If you have research, data, or testimonials that are unique to your comment, you can include these additional resources as an attachment to ensure that they are included in FNS's record.
- **If you have credibility in an issue area, say so.** It is important to provide context as to why you are weighing in on FNS's proposed changes. If you have specific expertise, please explain why you are uniquely qualified to offer your thoughts on this matter. As a WIC recipient or service provider, you have credibility to weigh in on this issue!

Once again, thank you for weighing in on this important issue!

## **Supplementary Template Comments**

[Introduce yourself/your agency and discuss the services that you provide within your community. E.g., My name is Connie Smith, and I am a WIC nutritionist in Maintown, USA. I work in a clinic that has a caseload of 700 WIC families. Every day, I work to provide quality nutrition support to pregnant and postpartum women, infants, and children.]. Thank you for the opportunity to provide additional [if you submitted in the earlier comment period] comments on this proposed rule's impact on school meals.

As young children grow and attend school, the school meals programs build upon the foundation of WIC services to ensure children continue to receive access to consistent meals. USDA now estimates that 982,000 children would lose direct certification in school meals as a result of this proposed rule, with approximately 537,000 children having to assume additional costs through either reduced price or paid rate meals. The additional paperwork burdens and costs may pose prohibitive barriers for many families, leaving children without food to eat at school. These new barriers threaten to unravel the hard work that WIC does to build positive nutrition outcomes for young children, improve educational outcomes, and reverse childhood obesity.

For these reasons, we call upon USDA to withdraw the proposed rule and maintain broad-based categorical eligibility.

## **Original Template Comment Letter**

October XX, 2019

Program Design Branch, Program Development Division  
Food and Nutrition Service, USDA  
3101 Park Center Dr.  
Alexandria, VA 22302

RE: FNS-2018-0037  
Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program

Dear Program Design Branch,

[Introduce yourself/your agency and discuss the services that you provide within your community. E.g., My name is Connie Smith, and I am a WIC nutritionist in Maintown, USA. I work in a clinic that has a caseload of 700 WIC families. Every day, I work to provide quality nutrition support to pregnant and postpartum women, infants, and children.]. I appreciate the opportunity to provide comments on proposed changes to broad-based categorical eligibility in the Supplemental Nutrition Assistance Program (SNAP).

In a nation of abundance, we still see so many families struggle to afford enough food. SNAP is the nation's largest nutrition assistance program, helping millions of families put food on the table. In order to truly combat food insecurity, USDA should be focused on enhancing efforts to streamline certification processes and improving access across programs. The proposed rule

would instead limit access and deprive families of much-needed nutrition support. USDA should therefore withdraw the proposed rule.

**The proposed rule would leave hundreds of thousands of children – as much as 500,000 – without access to free school meals.** Children in households that participate in SNAP are directly certified in federally subsidized free school meals. Broad-based categorical eligibility ensures that hundreds of thousands of children are able to receive free school meals instead of reduced-price, providing relief to families while reducing paperwork on both parents and school systems. [Add data here showing children eligible for free school lunch in your community]

**The proposed rule will increase the paperwork burden on families accessing WIC services, particularly in certain rural states.** SNAP and WIC work in tandem to provide nutrition support for a targeted population at a critical time of growth and development. Congress has allowed for SNAP, Medicaid, and TANF participation to reduce the administrative process when certifying individuals for WIC. Nearly 75% of WIC participants are able to waive burdensome certification requirements as a result of their participation in another federal program.

In five rural states (Arizona, Montana, Nevada, North Dakota, and West Virginia), broad-based categorical eligibility allows for SNAP eligibility to exceed the Medicaid eligibility threshold for pregnant women. While all states are able to utilize SNAP to streamline the WIC certification process, these rural states rely on SNAP to facilitate access to WIC, providing vital nutrition support for pregnant women and young children. [Add data pertaining to participants in your WIC program who are adjunctively eligible]

**The proposed rule would increase food insecurity, undermining SNAP’s core mission to relieve hunger.** SNAP has a proven record of reducing food insecurity, particularly in households with children. A mere six months of participation in SNAP is shown to reduce the likelihood of food insecurity by one-third, compared to similarly situated households. The effectiveness of federal nutrition support is well-documented, and it is no surprise that 43 out of 50 states availed themselves of the option to expand access to SNAP through broad-based categorical eligibility.

Every day, I serve families who are food insecure and working hard to put food on the table for their children. USDA’s proposed changes to broad-based categorical eligibility are misguided. If enacted, these changes would deprive children of access to food at a time of exceptional growth and development. USDA should withdraw the rule and restore confidence in the fundamental promise that no child should worry for food in the United States.

Thank you for consideration of our comments.

Sincerely,

[Name  
Title  
Agency]