**NWA Template Comments Addressing Federal Poverty Guidelines**

**Comment Period Closes: June 21, 2019**

Thank you for taking the time to submit a comment to the White House Office of Management and Budget (OMB) about proposed changes to the Official Poverty Measure (OPM). Below are template comments that can help you weigh in on the latest proposal that could impact our WIC families. **Comments must be submitted** [**here**](https://www.federalregister.gov/documents/2019/05/07/2019-09106/request-for-comment-on-the-consumer-inflation-measures-produced-by-federal-statistical-agencies) **by June 21, 2019.**

OMB is weighing whether to adjust the inflation index that is used to calculate the poverty threshold. Currently, many federal agencies use the Consumer Price Index for All Urban Consumers (CPI-U). The CPI-U draws on consumer data from approximately 93% of the national population. In [OMB’s Notice](https://www.govinfo.gov/content/pkg/FR-2019-05-07/pdf/2019-09106.pdf), the Administration is now considering moving federal agencies towards the Chained CPI-U, a metric that assumes slower increase in overall expenses. Should OMB adopt Chained CPI-U, the poverty threshold will rise at a slower rate, thus covering fewer families.

It is important to note that many programs – including WIC – rely on the Federal Poverty Guidelines articulated by the Department of Health and Human Services (HHS) to calculate eligibility. The OMB Notice specifically declares that it is not considering comments on the HHS Guidelines. Therefore, the comments must speak more broadly to the poverty thresholds.

If you are having difficulty in forming or submitting your comment, please contact Brian Dittmeier for assistance at bdittmeier@nwica.org.

As you prepare your comments, please:

* **Write comments in your own words.** OMB must review every unique comment; therefore, it is helpful if you modify the template language to include your own perspective and thoughts. 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 may wish to include these additional resources as an attachment to ensure that they are included in OMB’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 OMB’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!

Thank you once again for weighing in on this important issue!

June XX, 2019

Dr. Nancy Potok

Chief Statistician

Office of Management and Budget

725 17th Street NW

Washington, DC 20503

RE: OMB-2019-0002;
Comment on the Consumer Inflation Measures Produced by Federal Statistical Agencies

Dear Dr. Potok:

[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 this opportunity to provide comments on changes to the Official Poverty Measure (OPM).

OMB’s Notice seeks comment on changes to the inflation index used to calculate poverty measures across federal agencies. I see every day that the federal measures do not accurately capture the extent of poverty in my community. **The Official Poverty Measure should be expanded to more inclusively document the struggles faced by families, and OMB’s plans to incorporate a slower inflation index should be dismissed as inaccurate.**

We already know that the current poverty measure is insufficient to completely represent the need that we see in communities.WIC eligibility extends to those at 185% above the federal poverty guidelines calculated by the Department of Health and Human Services (HHS). Many families above the poverty threshold – including those with children – face challenges in accessing healthcare or food, struggling to make ends meet. [Add stories/data to demonstrate the need you see in your community]

Federal research confirms that that the poverty threshold is inadequate. A recent landmark study on child poverty by the National Academies of Sciences, Engineering, and Medicine (NASEM) highlights flaws with the current calculation, most notably that the poverty line does not fully include costs that reflect the realities and challenges faced by low-income families, such as the costs of child care. In response to these inaccuracies, researchers developed the Supplemental Poverty Measure (SPM) to more inclusively capture these unattributed costs and provide a more accurate representation of modern poverty. The SPM registers a higher rate of poverty than the official poverty measure, exposing the flaws in the current calculation and finally shining light on families that are not well served by the current threshold.

The OMB notice zeroes in on one particular metric – the rate of inflation. In presenting other options for calculating inflation, the OMB notice ignores the possibility that lower-income households may face higher rates of inflation, particularly with respect to rent and housing. When considering changes to the poverty measure, the federal government should instead consider a more holistic definition – including costs that more accurately represent basic living expenses.

**OMB cannot ignore the impacts on program eligibility.** The OMB notice does not seek comments on the HHS Guidelines, and we do not submit comments on that issue. However, efforts to standardize calculations across federal agencies are undoubtedly going to have an effect on the program that we administer, and OMB should conduct thorough analysis of the effects of any potential changes to program eligibility.

WIC’s tailored food package addresses both food security and nutrition deficiencies during pregnancy and early childhood. In addition to alleviating hunger, WIC reduces the risk of negative pregnancy and birth outcomes – including preterm birth and low birthweight. WIC also combats childhood obesity. As a result, WIC preventative supports contribute to significant healthcare costs savings. Before considering new guidelines or changes that could impact program eligibility, OMB should consider how a different inflation measure will impact access to healthcare, breastfeeding support, and food.

Every day, we serve families that are seeking a healthy start for their children. When considering any changes that may impact the delivery of services, OMB must reflect on the broader picture and thoughtfully consider the effects on American families.

Thank you for your consideration of our comments.

Sincerely,

[name]