

November 22, 2019

Certification Policy Branch
SNAP Program Development Division
Food and Nutrition Service, USDA
3101 Park Center Drive
Alexandria, Virginia 22302

RE: Notice of Proposed Rule Making Regarding Supplemental Nutrition Assistance Program (SNAP) Standardization of State Heating and Cooling Standard Utility Allowances – RIN 0584-AE69

Dear Certification Policy Branch:

We take this opportunity to comment in opposition to the U.S. Department of Agriculture's (USDA) proposed rule regarding Supplemental Assistance Nutrition Program (SNAP) Standardization of State Heating and Cooling Standard Utility Allowances. According to the Department's own estimates, the proposed rule would cut SNAP benefits by \$4.5 billion over five years, exacerbating food insecurity for one in five SNAP households and forcing many low-income people to choose between paying for the costs of food or utilities.

The Jewish Federations of North America (JFNA) is the umbrella organization for 146 Jewish Federations and 300 independent communities across North America. Our network of thousands of hospitals, aging and assisted living facilities, group homes, family service and vocational training agencies, kosher food banks and supplemental meal programs, and community centers and camps provide a full continuum of care for our nation's most vulnerable citizens – older adults, persons with disabilities, children and at-risk youth, and immigrants and refugees. Through private philanthropy and with the assistance of government support in a true public-private partnership, we serve more than one million clients in every state of the country, in Israel and more than 60 countries around the world.

The Network of Jewish Human Service Agencies (NJHSA) represents 140 non-profit human service organizations in the United States, Canada and Israel. NJHSA's members provide a full range of human services for the Jewish community and beyond, regardless of faith, background, ethnicity, and ability to pay. Services include supplemental food assistance, healthcare, career, and employment and mental health services, as well as programs for youth, family and seniors, Holocaust survivors, immigrants and refugees, people with disabilities, and caregivers.

The Jewish Council for Public Affairs (JCPA) is the national hub of the Jewish community relations network. Made up of 125 local community relations councils and 17 national Jewish agencies, JCPA serves as the national representative of the network's public policy platform. JCPA's mandate is to advance the interests of the Jewish people; to promote a just and pluralistic America; support Israel's quest for peace and security; and advocate for human rights around the world in common cause with civic, racial, ethnic, and faith-based leaders. Key among JCPA's policy priorities are combating poverty, expanding access to health care, and fighting hunger.

The Jewish community is particularly focused on SNAP because it plays a critical role in addressing hunger and food insecurity in our networks of communities. It is the first line of defense against hunger for hundreds of thousands of our Jewish agencies' lowest income clients. Further, Jewish text and tradition compel us to honor the dignity of every person, especially those who are struggling. Leviticus commands us to leave the corners of our fields and the gleanings of our harvest and vineyards for the poor and the stranger. This commandment is a clear expression of our collective responsibility for each other and that as Jewish organizations, we believe that no matter a person's circumstance, no one deserves to be hungry.

SNAP Lifts Low-Income Americans Out of Poverty

SNAP plays an integral role in fighting food insecurity in our community and among those we serve and is a critical tool in lifting low-income Americans out of poverty. According to USDA, 73.2 million people struggled to put food on the table in 2018. SNAP plays an integral role in improving the food security, health, and well-being of program participants across the lifespan. Conversely, research shows that a loss or reduction in SNAP benefits has detrimental impacts on food insecurity and health, especially for children and their families.

The Jewish community's philanthropy and network of human service agencies is committed to serving people in need, but we cannot match the role of government in assisting and supporting the one in eight Americans who live at risk of hunger. In fact, federal nutrition programs provide more than 10 times more food assistance than private congregations and charities.

Limiting SNAP would also have broader effects on the community. Based on USDA Economic Research Service analysis, it is estimated that each \$1 in federal SNAP benefits generates \$1.79 in economic activity. Those dollars help many food retailers operating on thin margins to remain in business; something that improves food access for all residents. A \$4.5 billion reduction in SNAP benefits will have lasting effects not only upon SNAP recipients, but throughout the economy.

Proposed Rule Standardizing Calculation of Standard Utility Allowances Should Be Rejected

We strongly oppose the proposed rule removing states' flexibility in calculating Standard Utility Allowances (SUA). Household resources needed to pay for basics such as shelter, utility costs and childcare are then not available to purchase food, and these costs differ throughout the country. This proposed policy change would reduce monthly SNAP benefits for 19 percent of recipients, exacerbating the struggles many low-income people have paying for costs of both food and utilities, and resulting in harmful impacts on individuals' health and well-being as well as on the economy. Furthermore, this policy change would disproportionately impact older adults and people with disabilities, representing the most vulnerable in our community and among those whom we serve.

Under current law, SNAP takes into account the utility expenses of each SNAP household. States adjust household benefits based on a state-specific SUA calculated by the state and approved by USDA. 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. The proposed rule

would standardize and cap SUA calculations across the country based on survey data, and limiting the cap to the 80th percentile of low-income people. This leaves out an assessment of the expenses for nearly 20 percent of SNAP households.

The Administration concedes that the proposed rule would cause one in five SNAP households to get lower SNAP monthly benefits, would disproportionately impact elderly people and people with disabilities, and would cause a national net cut to SNAP benefits amounting to \$4.5 billion over five years. The food security and health implications of the proposed rule are serious and disturbing. Food insecurity has direct and indirect impacts on physical and mental health for people of all ages. Food insecurity, even marginal food security (a less severe level of food insecurity), is especially detrimental to the health, development, and well-being of infants, children, and adolescents.

Further, the Farm Bill recently passed by strong bipartisan margins and signed into law by President Trump explicitly rejected attempts to restrict states' flexibility in administering SNAP to meet the specific needs of their low-income populations. Congress recognized that SNAP plays a critical role in addressing hunger and food insecurity and that states must have flexibility in administering the program. Averaging out benefit amounts across states by lowering benefits for large numbers of participants does not promote SNAP's statutory purpose, but instead undermines its statutory purpose.

We strongly oppose the proposed rule that would increase hunger for one in five SNAP households. This proposal would circumvent congressional intent as laid out in the recently-passed bipartisan Farm Bill reauthorization. Instead of policies that limit food assistance programs, USDA should focus on implementing the 2018 Farm Bill provisions and other measures that will help support the vast numbers of needy Americans.

Sincerely,

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