



September 23, 2019

Program Design Branch  
Program Development Division, FNS  
USDA, 3101 Park Center Drive  
Alexandria, VA 22302

*Submitted electronically through regulations.gov*

**Re: Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP) [FNS-2018-0037]**

Dear Program Design Branch:

Thank you for the opportunity to submit comments in response to the proposed changes to eligibility for the Supplemental Nutrition Assistance Program (SNAP). The Center for Consumer Engagement in Health Innovation at Community Catalyst is a national advocacy organization that amplifies the voices of consumers and communities in health care and in health policy. We are deeply concerned that these changes will prevent low-income families, older adults and people with disabilities from accessing vitally important food assistance.

Our mission is to organize and sustain a powerful consumer voice to ensure that all individuals and communities can influence the local, state and national decisions that affect their health. We work with state and local consumer health advocates to promote innovative, person-centered health care that focuses on the well-being of vulnerable people and communities across the country. One key focus of our work has been guiding health programs and health systems to address the social and economic conditions that affect health, including access to food. We highlight the adverse health impacts likely to result from the proposed changes to SNAP eligibility, and ask the Department to withdraw the proposed rule.

**Access to SNAP Benefits Improves Health Outcomes and Reduces Health Care Costs**

There is a clear relationship between nutrition and health, and a significant body of research demonstrates the positive impact that SNAP benefits have on health outcomes.<sup>1</sup> SNAP assistance has long-term benefits, especially for growing children; SNAP has been shown to improve short-term and long-term health, as well as academic performance, educational attainment, and economic self-sufficiency.<sup>2</sup> SNAP assistance is also important for older adults. Among older adults, food insecurity has been linked to worse

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<sup>1</sup> Gundersen, Craig and James P. Ziliak. 2015. Food insecurity and health outcomes. *Health Affairs*, 34(11): 1830–1839. doi.org:10.1377/hlthaff.2015.0645

<sup>2</sup> White House Council of Economic Advisers. (2015). “Long-Term Benefits of the Supplemental Nutrition Assistance Program.” [https://obamawhitehouse.archives.gov/sites/whitehouse.gov/files/documents/SNAP\\_report\\_final\\_nonembargo.pdf](https://obamawhitehouse.archives.gov/sites/whitehouse.gov/files/documents/SNAP_report_final_nonembargo.pdf)

health status, diabetes, depression, congestive heart failure, hypertension, obesity, lower cognitive function, and lower intake of calories and key nutrients.<sup>3</sup>

Additionally, SNAP enrollment is associated with reduced health care expenditures.<sup>4</sup> Food insecure households have been shown to ration medication, postpone or go without medical care, and avoid adhering to medically-necessary special diets.<sup>5</sup> At the end of the month when household budgets run low, hospital admissions for hypoglycemia (low blood sugar) spike in low-income populations.<sup>6</sup> Among older adults who are dually-eligible for both Medicare and Medicaid, participation in SNAP was associated with a lower risk of nursing home admission and fewer days stay among those admitted.<sup>7</sup>

### **Eliminating Broad-Based Categorical Eligibility Makes it Harder for Households to Access Benefits and Increases Administrative Burden**

The United States Department of Agriculture estimates that 3.1 million individuals (9% of SNAP recipients) would lose benefits under the proposed rule, which restricts states' abilities to allow individuals to qualify for SNAP through broad-based categorical eligibility.<sup>8</sup>

More than 40 states and territories already use broad-based categorical eligibility.<sup>9</sup> Broad-based categorical eligibility allows states to raise SNAP eligibility limits somewhat so that many low-income working families that have difficulty making ends meet, such as because they face costly housing or child care expenses that consume a sizeable share of their income, can receive help affording adequate food. The policy also lets states adopt less restrictive asset tests so that families, older adults and people with disabilities can have modest savings without losing SNAP. Broad-based categorical eligibility also helps

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<sup>3</sup> Hartline-Grafton, Heather. (2017). "The Role of the Supplemental Nutrition Assistance Program in Improving Health and Well-Being." Food Research & Action Center. <https://frac.org/wp-content/uploads/hunger-health-role-snap-improving-health-well-being.pdf>

<sup>4</sup> Berkowitz, Seth A., Hilary K. Seligman, Joseph Rigdon, James B. Meigs and Sanjay Basu. 2017. Supplemental Nutrition Assistance Program (SNAP) Participation and Health Care Expenditures Among Low-Income Adults. *Journal of the American Medical Association* 77(11): 1642-1649. doi:10.1001/jamainternmed.2017.4841

<sup>5</sup> Hartline-Grafton, Heather. (2017). "The Role of the Supplemental Nutrition Assistance Program in Improving Health and Well-Being." Food Research & Action Center. <https://frac.org/wp-content/uploads/hunger-health-role-snap-improving-health-well-being.pdf>

<sup>6</sup> Seligman, Hilary K., Ann F. Bolger, David Guzman, Ana López and Kirsten Bibbins-Domingo. 2014. Exhaustion of food budgets at month's end and hospital admissions for hypoglycemia. *Health Affairs*, 33(1), 116–123. doi.org/10.1377/hlthaff.2013.0096

<sup>7</sup> Szanton, Sarah L., Laura J. Samuel, Rachel Cahill, Ginger Zielinskie, Jennifer L. Wolff, Roland J. Thorpe Jr. and Charles Betley. 2017. Food assistance is associated with decreased nursing home admissions for Maryland's dually eligible older adults. *BMC Geriatrics*, 17(1), 162. doi:10.1186/s12877-017-0553-x

<sup>8</sup> "(AE 62) Revision of Categorical Eligibility in SNAP Regulatory Impact Analysis." 2019. United States Department of Agriculture Food and Nutrition Service. <https://www.regulations.gov/document?D=FNS-2018-0037-0002>

<sup>9</sup> "The Supplemental Nutrition Assistance Program (SNAP): Categorical Eligibility." 2019. Congressional Research Service. <https://fas.org/sgp/crs/misc/R42054.pdf>

to streamline the application process for those who have already undergone the strict qualification process for other benefits.

Removal of broad-based categorical eligibility would add costly administrative burdens to the SNAP program. A change would require expensive changes in information systems, training, and eligibility processing procedures. As a result of this proposed rule, the cost to the federal government is estimated to be \$1.157 billion over five years, in addition to \$96 million in costs for states.<sup>10</sup> The removal of broad-based categorical eligibility is also likely to increase program “churn,” where households move on and off the SNAP program within a short period, incurring financial and administrative costs for the state and harm to individuals and families. States with broad-based categorical eligibility have been shown to reduce administrative churn by 26%.<sup>11</sup>

### **The Proposed Rule Would Have Disproportionate Impacts on the Most Vulnerable Populations**

Millions of low-income people rely on SNAP to access a nutritious diet, and approximately two-thirds of SNAP participants are children, older adults or people with disabilities.

The percentage of SNAP-enrolled households with one or more older adults increased from 15 percent in 1992 to 24 percent in 2017, and will only continue to grow.<sup>12</sup> Households with older adults will likely be disproportionately affected by the proposed rule, with 13.2% of households with older adults likely to lose benefits, compared to 9% of households overall.<sup>13</sup> Older adults and people with disabilities will also be particularly hurt by the loss of flexibility for states to raise the asset limit of \$3,500.<sup>14</sup> Without this flexibility, older adults and people with disabilities are penalized for building even small nest eggs and become less able to weather unexpected emergencies.

SNAP is also critical for addressing childhood hunger and its devastating impacts. SNAP participation is linked with better health for children throughout their life span, and also has positive impacts on their

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<sup>10</sup> “(AE 62) Revision of Categorical Eligibility in SNAP Regulatory Impact Analysis.” 2019. United States Department of Agriculture Food and Nutrition Service. <https://www.regulations.gov/document?D=FNS-2018-0037-0002>

<sup>11</sup> Ratcliffe, Caroline, Signe-Mary McKernan, Laura Wheaton and Emma Kalish. (2016). “The Unintended Consequences of SNAP Asset Limits.” The Urban Institute. <https://www.urban.org/sites/default/files/publication/82886/2000872-The-Unintended-Consequences-of-SNAP-Asset-Limits.pdf>

<sup>12</sup> Cronquist, Kathryn and Sarah Lauffer. (2017). “Characteristics of USDA Supplemental Nutrition Assistance Program Households: Fiscal Year 2017.” U.S. Department of Agriculture, Food and Nutrition Service. <https://www.fns.usda.gov/snap/characteristics-supplemental-nutrition-assistance-program-households-fiscal-year-2017>

<sup>13</sup> “(AE 62) Revision of Categorical Eligibility in SNAP Regulatory Impact Analysis.” 2019. United States Department of Agriculture Food and Nutrition Service. <https://www.regulations.gov/document?D=FNS-2018-0037-0002>

<sup>14</sup> Rosenbaum, Dorothy. (2019). “SNAP’s ‘Broad-Based Categorical Eligibility’ Supports Working Families and Those Saving for the Future.” Center for Budget and Policy Priorities. <https://www.cbpp.org/research/food-assistance/snaps-broad-based-categorical-eligibility-supports-working-families-and>

caregivers, including improved maternal health.<sup>15</sup> Broad-based categorical eligibility allows children to be automatically enrolled in free and reduced school lunch programs, and the Congressional Budget Office estimates that 265,000 children are enrolled in free school lunches because of this expanded eligibility.<sup>16</sup> While families would still qualify for free or reduced lunch with the elimination of broad-based categorical eligibility, the additional burden of qualifying for the separate program may be a deterrent for families.

The SNAP program has a dramatic impact on improving the health of vulnerable populations. Broad-based categorical eligibility ensures the people who qualify for and are in need of food assistance are able to receive it. We strongly urge you maintain broad-based categorical eligibility for SNAP, recognizing the critical role food security plays in health. The proposed changes to the SNAP program would be a misguided action that would have devastating long-term health impacts for millions of low-income people across our nation.

Thank you for your consideration.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'Ann Hwang', with a stylized, flowing script.

Ann Hwang, MD  
Director

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<sup>15</sup> “Doctor Approved Policy Recommendations: SNAP.” Children’s Health Watch. Accessed September 23, 2019. <https://childrenshealthwatch.org/wp-content/uploads/DoctorsRecommendSNAP-1.pdf>

<sup>16</sup> “H.R. 2, Agriculture and Nutrition on Act of 2018, As ordered reported by the House Committee on Agriculture on April 18, 2018.” 2018. Congressional Budget Office. [https://www.cbo.gov/system/files/2018-07/hr2\\_1.pdf](https://www.cbo.gov/system/files/2018-07/hr2_1.pdf)