



September 20, 2019

SNAP Program Design Branch
Program Development Division
Food and Nutrition Service
U.S. Department of Agriculture
3101 Park Center Drive
Alexandria, VA 22302

RE: Notice of Proposed Rule Making — Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP) RIN 0584

Dear SNAP Program Design Branch:

On behalf of Virginia PTA and our 200,000 members we appreciate the opportunity to comment on the U.S. Department of Agriculture's (USDA) Notice of Proposed Rule Making on a Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP).

The Supplemental Nutrition Assistance Program (SNAP) is our nation's most important anti-hunger program and is proven to reduce poverty and food insecurity. Participation in SNAP links children from struggling families to much-needed free school meals.

About 40 million low-income people received SNAP benefits in 2018, and under the proposed revisions, at least 3 million could lose benefits. That includes about half a million students who could lose access to free breakfast and lunch at school.

The elimination of Broad Based Categorical Eligibility (BBCE) will impact eligibility methodologies used by 39 states, the District of Columbia, Guam and the US Virgin Islands. It is important to recognize that households in states that use Broad-Based Categorical Eligibility (BBCE) must still verify income, go through interviews, and comply with mandatory policies like time limits for childless adults. Use of BBCE does not eliminate an evaluation of eligibility but rather helps ensure that working families with high living expenses, such as child care and housing, lose SNAP benefits gradually. This enables them to increase their family security, savings and health, rather than facing a sharp "benefit cliff" where they immediately lose benefits as their income level starts to rise.

Virginia is one of 11 states that does not lift or eliminate the gross income limit or asset test allowed through the use of BBCE. It's important that states retain this right to control how they support families and ensure children have access to food both at home and at school.

In Virginia, 776,000 residents or 9% of the population uses SNAP benefits and more than 69% of those participants are in families with children. On average SNAP provided \$409 to households with children in 2017. [1]

Importantly, children who live in households that receive SNAP benefits are directly certified (automatically eligible) to receive free school meals without needing to submit a school meal application. This is an important factor to consider when evaluating the potential loss of SNAP benefits for 500,000 children because when 40% of a school population automatically qualifies for free school meals (due to enrollment in SNAP and other government assistance programs), that school qualifies for the Community Eligibility Provision (CEP). Utilizing CEP can enable a school to combat childhood hunger and reduce stigma for low income families by offering free school meals to the entire student population without the burden of extra paperwork and verification. This means, removing SNAP benefits from some children may have a trickle down effect on other children who receive free meals through a CEP program. Newport News in Virginia is an example of a school system that offers free breakfast and lunch to all students as a result of it's CEP eligibility. The nutritious breakfasts and lunches that low-income children receive at school are important for improving academic achievement, reducing tardiness, absenteeism and discipline referrals.

Additionally, 75% of school districts are struggling with unpaid school meal fees. Making it more difficult for children to receive meals through SNAP could potentially result in more unpaid school meal fees, which will directly impact school districts with limited funds to cover those foods costs and leave more children sitting in classrooms hungry.

Congress has repeatedly considered and rejected legislative proposals that would roll back broad-based categorical eligibility. It's important that the debate about how to best address our nation's poverty and hunger problems not be circumvented.

Childhood hunger is linked to academic struggles, difficulties focusing and concentrating, mental health disorders, and increased behavioral referrals. It's critical that states have access to tools such as BBCE to assist struggling families. We oppose the proposed rule that would jeopardize student access to free school meals, while at the same time reducing the nutrition available to them at home.

Sincerely,

Jenna Alexander

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Donna Colombo

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President, Virginia PTA

[1] Center on Budget and Policy Priorities
<https://www.cbpp.org/research/food-assistance/a-closer-look-at-who-benefits-from-snap-state-by-state-fact-sheets#Virginia>