

NACCHO

National Association of County & City Health Officials

The National Connection for Local Public Health

September 23, 2019

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

Re: FNS–2018– 0037, “Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program”

Sent via email to SNAPPDBRules@usda.gov

Dear Program Design Branch:

On behalf of the National Association of County and City Health Officials (NACCHO), representing the nation’s nearly 3,000 local health departments, I write to oppose the proposed revision of “broad based categorical eligibility” in USDA’s Supplemental Nutrition Assistance Program (SNAP), which was published in the Federal Register on July 23, 2019, and to urge the U.S. Department of Agriculture (USDA) to withdraw the proposed change.

Local health departments are responsible for safeguarding the health of all people in their communities, including those at risk for developing chronic disease. They work to ensure healthy food access for all residents through initiatives that aim to increase the accessibility, affordability, and availability of healthy foods. This is important because millions of Americans, especially people with low incomes, the elderly, people with disabilities, and other transit-dependent populations, have difficulty accessing fresh, nutritious food.¹

Research shows that access to healthy food is an important factor in preventing chronic diseases like diabetes and heart disease, while food insecurity is a risk factor for negative psychological and health outcomes.² By the USDA’s own calculations, the proposed rule would increase food insecurity for 3.1 million Americans – nearly 9% of SNAP recipients.³ These proposed changes would hurt the health and well-being of individuals, including children and their families, as well as strain the health care system through increased utilization and costs.⁴ These are some of the many reasons that Congress debated and rejected adding a similar proposal in the 2018 Farm Bill. This proposed rule attempts to circumvent that Congressional decision.

SNAP remains one of our nation’s key resources in the fight against hunger and is particularly important to vulnerable populations. More than three-quarters of SNAP households include a child, an elderly person, or a person with disabilities; and 85% of all SNAP benefits go to such households.⁵ USDA has instituted the Food Incentive Nutrition Initiative (FINI) to increase the purchasing power of shoppers using their SNAP benefits to purchase fruits and vegetables at farmers markets and other types of



healthy food retailers, including grocery stores and mobile markets. Regular access to healthy and affordable meals is one of the strongest predictors of improved school performance, better health, and sound childhood development.⁶ This strong evidence base makes clear that any policy changes should reduce food insecurity, not increase it as this change would.

Thank you for the opportunity to comment on this proposed regulation. Please contact Eli Briggs, NACCHO Senior Government Affairs Director, with any questions at 202-507-4194/ebriggs@naccho.org.

Sincerely,



Lori Tremmel Freeman, MBA
CEO

¹ Food Research and Action Center. "The Role of the Supplemental Nutrition Assistance Program in Improving Health and Well-Being." Retrieved September 18, 2019 from <https://frac.org/wp-content/uploads/hunger-health-role-snap-improving-health-well-being.pdf>.

² *Health Affairs*. Vol. 34 No. 11. "Food Insecurity and Health Outcomes." Retrieved September 18, 2019 from <https://doi.org/10.1377/hlthaff.2015.0645>.

³ Federal Register. "Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program." Retrieved September 18, 2019 from <https://www.regulations.gov/document?D=FNS-2018-0037-0001>.

⁴ Urban Institute. "How Households with Children Are Affected by Restricting Broad-Based Categorical Eligibility for SNAP." Retrieved September 18, 2019 from <https://www.urban.org/research/publication/how-households-children-are-affected-restricting-broad-based-categorical-eligibility-snap>.

⁵ Lauffer, S. (2017). Characteristics of Supplemental Nutrition Assistance Program Households: Fiscal Year 2015. Report No. SNAP-17-CHAR. Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service, Office of Policy Support. Retrieved September 18, 2019 from <https://fns-prod.azureedge.net/sites/default/files/ops/Trends2010-2015.pdf>.

⁶ The Food Trust's Center for Healthy Food Access, Fair Food Network and Wholesome Wave (2018). The Power of Produce: Healthy Food Incentives Empower Families, Support Farmers and Lift Up Communities. Retrieved September 18, 2019 from http://thefoodtrust.org/uploads/media_items/the-power-of-produce.original.pdf.