September 23, 2019

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

Re: Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP), Docket Number FNS-2018-0037

Dear Administrator Lipps:

The National League of Cities (NLC) is the voice of America’s cities, towns and villages, representing more than 280 million people across the country. NLC works to strengthen local leadership, influence federal policy and drive innovative solutions. As such, we appreciate the opportunity to submit these comments on the U.S. Department of Agriculture’s notice of proposed rulemaking to revise categorical eligibility in the Supplemental Nutrition Assistance Program (SNAP). We believe that the proposed changes would have a direct negative impact on the economic vitality of our communities, including the health and well-being of residents, and, as such, ask that the proposed rule be reconsidered.

Access to public benefits, including nutrition assistance, provides a critical path towards economic mobility and security for many residents in our communities. While the SNAP program reduces poverty and food insecurity, it also provides for positive health and well-being outcomes for children and families. More broadly, SNAP is an economic stimulus. During our most recent recession in 2009, for every dollar increase in SNAP, $1.70 was generated in economic activity.

As proposed, the current rule would refine categorical eligibility for SNAP for those enrolled in Temporary Assistance for Needy Families (TANF) programs. Specifically, the proposal to provide categorical eligibility only to those who have qualified for ongoing and substantial benefits from TANF-funded programs would cut-out a significant number of our residents who depend on SNAP and TANF to bridge the gap when self-sufficiency is not possible. As you well know, there are many residents in our communities that go in and out of the need for supportive services.

1 https://www.cbpp.org/research/snap-is-effective-and-efficient
to ensure that their families are well fed and cared for. As proposed, the current changes would not allow these families the support they need and would have a detrimental impact on them and their communities at-large. Should this proposed rule move forward, these changes would impede an individual’s ability to reach their full economic potential, place strain on local food pantries and cause long-lasting harm to local economies, including impacts on local grocery stores. While we understand the need to ensure only those who truly need SNAP resources receive them, across-the-board elimination of categorical eligibility is not the answer.

The budget of any city is impacted by the financial stability of their residents. The proposed rule would burden a city’s municipal courts budget, strain nonprofit providers’ ability to address issues within their community by increasing their caseloads and most importantly decrease the ability of families to stay financially stable. Not only would the proposed rule negatively impact residents, it would also reduce the ability of cities to address the needs of their communities through investments and essential services.

We thank you for the opportunity to offer comment and look forward to continuing to work together on federal policies and programs that help cities and towns grow their economies and protect the health and well-being of residents. If you have questions about the information provided, please do not hesitate to contact me or Stephanie Martinez-Ruckman, Program Director for Human Development at martinez-ruckman@nlc.org or 202-626-3098.

Sincerely,

Clarence E. Anthony
CEO and Executive Director

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