



September 23, 2019

Food and Nutrition Service, USDA
Program Design Branch, Program Development Division
3101 Park Center Dr.
Alexandria, VA 22302

Re: Comments to Docket No.FNS-2018-0037, Comments in Response to the Proposed Revision of Categorical Eligibility in the Supplemental Nutrition Assistance

To Whom It May Concern:

I am writing on behalf of the National Association for the Education of Young Children (NAEYC) to express our organization’s strong opposition to the Food and Nutrition Services’ proposed ruleⁱ to revise and nearly eliminate broad-based categorical eligibility in the Supplemental Nutrition Assistance Program (SNAP). Since one of our goals as an organization is to advance policies that strengthen the ability for our children, families, and communities to thrive, **we urge that this proposed rule – which would punish parents and harm children – be withdrawn in its entirety.**

NAEYC is a 90+ year old non-profit organization comprised of 60,000 members and 52 Affiliates across the country, committed to a vision in which all young children thrive and learn in a society dedicated to ensuring they reach their full potential. With our rich history of advocating for federal programs and policies that positively impact and advance the life outcomes of young children and their families, and our focus on promoting high-quality early learning, we fully understand how critical it is for children and their parents to have access to safe and secure housing, healthy meals, and adequate medical services as part of a foundation that sets the stage for them to benefit from high quality early childhood experiences in their most formative years.

The proposed revision would have a deeply damaging effect on the well-being of families and children—taking SNAP away from 3.1 million people nationwide and jeopardizing automatic access to free school lunch for more than 500,000 children.ⁱⁱ The proposed rule would especially harm working families with children. These families are disproportionately likely to lose benefits under the proposed ruleⁱⁱⁱ and families with high expenses, such as child care, are particularly at risk.^{iv} That’s because broad-based categorical eligibility (BBCE) supports families struggling to pay the high costs of child care, housing, and other basic needs in two ways. First, BBCE allows states to take into account families’ expenses when calculating their SNAP benefits. Second, BBCE smooths “benefit cliffs” for families with high expenses to ensure that, when they get a raise or work more hours, they are not punished by losing more benefits than the increase in earnings.^v

By eliminating states’ ability to address families’ realities through BBCE, this proposed rule would punish children and families.^{vi} Costs like child care and housing aren’t optional expenditures for families—they are critical for economic security and mobility. They also require parents to bear a significant financial burden; in 33 states and the District of Columbia, for example, infant care is more expensive than college tuition.^{vii}

We join many partners in elevating our deep concerns that the proposed rule would increase rates of hunger and food insecurity for working families with children, putting their health, well-being, and learning at risk. When children and their families have access to SNAP and school lunch, they are healthier and more economically secure.^{viii} If struggling households are unable to access supports children need, including nutrition assistance, they will experience more illnesses, miss learning opportunities, and fall behind their peers. Federal policies should reduce and eliminate disparities in opportunities and outcomes while supporting a child's ability to live a healthy, productive life—not deny their ability to reach their full potential.

BBCE supports families' ability to work, save, and escape poverty. BBCE allows states to consider a family's annual infant child care costs^{ix}—expenses that allow both parents to work—and make them eligible for food assistance, even though they're over the federal gross income limit. This would be impossible if the proposed rule goes into effect. **The proposed rule would increase poverty, hunger, and illness with profound negative outcomes for children during childhood and into adulthood.^x For this reason, and those illuminated above, we urge you to withdraw this harmful rule in its entirety.** Thank you for your consideration of these comments.

Sincerely,



Lauren Hogan
Managing Director, Policy and Professional Advancement

ⁱ Proposed Rule, "Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP)," *Federal Register* 84, no. 142 (July 24, 2019): 35570, <https://www.federalregister.gov/documents/2019/07/24/2019-15670/revision-of-categorical-eligibility-in-the-supplemental-nutrition-assistance-program-snap#open-comment>

ⁱⁱ Suzy Khimm, "Trump plan failed to note that it could jeopardize free school lunches for 500,000 children, Democrats say," NBC News, July 19, 2019, <https://www.nbcnews.com/politics/white-house/trump-plan-failed-note-it-could-jeopardize-free-school-lunches-n1035281>.

ⁱⁱⁱ Elizabeth Laird and Carole Trippe, "Programs Conferring Categorical Eligibility for SNAP: State Policies and the Number and Characteristics of Households Affected," *Mathematica*, February 28, 2014, <https://www.mathematica-mpr.com/our-publications-and-findings/publications/programs-conferring-categorical-eligibility-for-snap-state-policies-and-the-number-and-characteristics-of-households-affected>

^{iv} Dottie Rosenbaum, "SNAP's 'Broad-Based' Categorical Eligibility' Supports Working Families and Those Saving for the Future," Center on Budget and Policy Priorities, July 30, 2019, <https://www.cbpp.org/research/food-assistance/snaps-broad-based-categorical-eligibility-supports-working-families-and>

^v Carrie Welton, "From Rhetoric to Reality: What it takes for Public Benefits to Work Better for Workers," CLASP, August 2017, <https://www.clasp.org/publications/report/brief/rhetoric-reality-what-it-takes-public-benefits-work-better-workers>

^{vi} Dottie Rosenbaum, "SNAP's 'Broad-Based' Categorical Eligibility' Supports Working Families and Those Saving for the Future," Center on Budget and Policy Priorities, July 30, 2019, <https://www.cbpp.org/research/food-assistance/snaps-broad-based-categorical-eligibility-supports-working-families-and>

^{vii} Economic Policy Institute, "The Cost of Child Care," 2019, <https://www.epi.org/child-care-costs-in-the-united-states/>

^{viii} Patricia Cole and Barbara Gebhard, "Nutrition Assistance: A Critical Support for Infants, Toddlers, and Families," CLASP and ZERO TO THREE, October 2017, <https://www.clasp.org/sites/default/files/publications/2017/10/Nutrition%20FINAL%2010-11-17%20%282%29.pdf>.



^x Child Care Aware of America, *The US and the High Cost of Child Care Appendices*, 2018, Appendix I, <http://usa.childcareaware.org/wp-content/uploads/2018/10/appendices18.pdf?hsCtaTracking=189a8ba7-22d8-476b-aa2e-120483a43702%7Ce7f035de-f88f-4732-8204-a30353610929>. Figures are averages for center-based care.

^x American Psychological Association, *Effects of Poverty, Hunger and Homelessness on Children and Youth*, 2018, <https://www.apa.org/pi/families/poverty.aspx>; Caroline Ratcliffe, Signe-Mary McKernan, *Child Poverty and Its Lasting Consequence*, Urban Institute, 2012, <http://www.urban.org/UploadedPDF/412659-Child-Poverty-and-Its-Lasting-ConsequencePaper.pdf>; Greg J. Duncan, Katherine Magnuson, *The Long Reach of Early Childhood Poverty*; Robert D. Putnam, *Our Kids: The American Dream in Crisis*, New York, New York, 2015.