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December 2, 2019

Certification Policy Branch  
Program Development Division  
Food and Nutrition Service, FNS  
U.S. Department of Agriculture  
3101 Park Center Drive, Room 812  
Alexandria, VA 22302

Re: Docket ID Number FNS-2019-0009-0001, Supplemental Nutrition Assistance Program: Standardization of State Heating and Cooling Standard Utility Allowances

To Whom it May Concern:

We write on behalf of the University of California's Nutrition Policy Institute in opposition to U.S. Department of Agriculture's (USDA) Food and Nutrition Service's proposed rule (Document Number 2019-21287) that would revise Supplemental Nutrition Assistance Program (SNAP) regulations to standardize the methodology for calculating standard utility allowances (SUAs or standards).

For nearly twenty years, researchers at the Nutrition Policy Institute (NPI) have engaged in research to improve nutrition policy in California and the nation, with special emphasis on the challenges for low-income communities and individuals in accessing a healthy diet. Taking a public-health approach, NPI focuses much of its work on low-income individuals and families, for whom evidence-based disease-prevention interventions have been shown to improve health and wellbeing and to decrease health disparities and healthcare costs. Seeking to improve nutrition and health for the largest number of low-income individuals, NPI studies have documented the benefits of federal food programs in enhancing population nutrition and reducing food insecurity. Because low-income families are at the heart of so much that NPI does, NPI has deep interest in SNAP, the nation's largest food assistance program, and in proposed modifications to the program.

It appears from FNS's own analysis of the proposed rule that it would cause nearly 26 percent of California SNAP participants to lose benefits while only 14 percent would gain (Appendix Table E, State Level Impacts of Proposed Rule, Regulatory Impact Analysis, 7 CFR Part 273, Supplemental Nutrition Assistance Program: Standardization of State Heating and Cooling Standard Utility Allowances). Most of California's SNAP participants live in areas of the state experiencing notoriously high costs of living so their utility expenses are likely to be high. These same circumstances mean that participants' SNAP benefits are severely stretched to begin with. Further benefit erosion to what already is a level of benefit that fails to enable participants to purchase an adequate diet is simply

counterproductive to the purposes of the SNAP program and would jeopardize participants' nutrition, health, and productivity.<sup>1</sup>

Second, the proposed rule would do substantial damage to California's economy, its agriculture sector, in particular. As the official proposed rule analysis states at the beginning, "The Department has estimated the total reduction in Federal SNAP spending associated with the proposed rule to be approximately \$4.5 billion over the five years 2021-2025." According to FNS's "Foods Typically Purchased by Supplemental Nutrition Assistance Program (SNAP) Households (Summary)," November 2016, vegetables account for 17.2 percent and fruit 4.7 percent of total SNAP purchases, or nearly \$1 billion of produce. As California is recognized to be the nation's leading producer of fruits and vegetables, the reduction in SNAP produce purchases would likely translate into a significant loss of agricultural sales, a loss that would be felt in numerous rural communities and at various levels of the agricultural industry throughout the state.

Third, to the extent that the proposed rule would reduce SNAP participation and discourage families from applying for SNAP benefits, the impact would be felt in school meal participation, also, as fewer students would be directly certified for free school meals and fewer schools and school districts would qualify for universal meals through the community eligibility provision. Not only would the loss of free school meals put greater strain on already stretched family budgets, it also might well affect students' academic performance. This, of course, is a matter of great importance to the University of California and to other institutions of higher learning.

In light of the severely harmful impact this proposed rule would have on California SNAP participants, on our communities' economic vitality, and on the academic readiness of candidates for higher education, NPI registers its strong opposition to the proposed rule.

Sincerely,



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<sup>1</sup> Institute of Medicine and National Research Council Committee on Examination of the Adequacy of Food Resources and SNAP Allotments. (2013). *Supplemental Nutrition Assistance Program: Examining the Evidence to Define Benefit Adequacy*. Washington, DC: National Academies Press.