

September 23, 2019

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

RE: Notice of Proposed Rule Making -- Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP) RIN 0584-AE62

Dear SNAP Program Design Branch:

We—the undersigned faith-based organizations representing various religious organizations, denominations, and faith traditions—are united in our commitment to reduce hunger and improve nutrition in the U.S. Our diverse values and holy scriptures instruct us to ensure that everyone may live with dignity and the opportunity to recognize their full potential. We join together to care for those who are poor and vulnerable, including the millions of Americans facing hunger.

**We have serious concerns about the Trump Administration’s notice for proposed rulemaking to “revise” Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP).**

Categorical Eligibility is an important state flexibility option for SNAP, allowing states to simplify the application process for both applicants and program administrators. It has been utilized by over 40 states over the past two decades, enabling states to slightly raise income eligibility limits and relax restrictive asset tests so that low-income working families with modest savings can still receive SNAP. States must still review every household’s income to determine the SNAP benefit level—Categorical Eligibility simply allows states to align SNAP’s eligibility limits with other government assistance programs like Temporary Assistance for Needy Families (TANF).

By USDA’s own estimate, the proposed rule change would result in over 3.1 million people losing access to life-saving nutrition benefits. The people hurt most would be SNAP recipients who are working hard to break the cycle of poverty and put food on the table. It will particularly impact households with seniors and people with disabilities. Furthermore, since children in households that receive SNAP are automatically eligible for free school meals, over 500,000 children would lose access to free school meals.

This new attack against SNAP is an attempt to circumvent congressional intent as laid out in the bipartisan 2018 Farm Bill reauthorization. Instead of rulemaking that jeopardizes food assistance for struggling Americans, USDA should focus on implementing the 2018 Farm Bill and strengthening critical nutrition assistance programs like SNAP.

Many of our organizations, congregations, and leaders work to feed, clothe, house, and serve our friends and neighbors who are struggling, but we know that we cannot do this work alone. More than 40 million American men, women, and children struggle to put food on the table on a regular basis. While charitable organizations play a vital role in addressing hunger, we know that the overwhelming majority of food assistance in this country has historically come from—and must continue to come from—federal programs. Simply put: the charitable food sector is in no way equipped to respond to the scope of food insecurity in America.

Our values and traditions compel us to honor the dignity of every person, especially those who are struggling. No matter a person's circumstance, no one deserves to be hungry.

Signed,

American Muslim Health Professionals  
Bread for the World  
Church World Service  
The Episcopal Church  
Evangelical Lutheran Church of America  
Friends Committee on National Legislation  
Islamic Relief USA  
Jesuit Conference - Office of Justice and Ecology  
Jewish Council for Public Affairs  
Jewish Federations of North America  
MAZON: A Jewish Response to Hunger  
National Council of Jewish Women  
NETWORK Lobby for Catholic Social Justice  
Network of Jewish Human Service Agencies  
Presbyterian Church (U.S.A.)  
Rabbinical Assembly  
Sojourners  
The Episcopal Church  
The United Methodist Church - General Board of Church and Society  
T'ruah: The Rabbinic Call for Human Rights  
Union for Reform Judaism  
United Church of Christ  
Women of Reform Judaism