

September 23, 2019

Mr. Brandon Lipps
Acting Deputy Under Secretary
Food, Nutrition, and Consumer Services
U.S. Department of Agriculture
3101 Park Center Drive
Alexandria, VA 22302

Re: Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program [FNS-2018-0037]

Dear Mr. Lipps:

On behalf of the physician and medical student members of the American Medical Association (AMA), I appreciate the opportunity to provide comments on the proposed rule issued by the Food and Nutrition Service (FNS) of the U.S. Department of Agriculture (USDA) that would revise categorical eligibility state options and use a higher gross income test in the Supplemental Nutrition Assistance Program (SNAP). The AMA is concerned that these proposed changes would result in the loss of SNAP benefits for 3.1 million people—about 8 percent of participants—and in the loss of automatic eligibility for free or reduced-price school meals through the National School Lunch Program (NSLP) for more than 500,000 children. In turn, the proposal could result in increased rates of poverty and food insecurity. The AMA urges USDA to withdraw this proposal and reconsider its approach to SNAP.

According to the USDA, food insecurity is defined as a lack of consistent access to enough food for an active, healthy life. The [Economic Research Service](#) of the USDA found that an estimated 11.1 percent of U.S. households (14.3 million households) were food insecure at least some time during the year in 2018, with the prevalence of very low food security at 4.3 percent (5.6 million households). SNAP, formerly known as the Food Stamp Program, is the main source of nutrition assistance for millions of low-income individuals and families, with a monthly average of 40.3 million persons in 20.1 million households participating in Fiscal Year 2018, and is especially important to vulnerable populations, including children, seniors and people with disabilities, in both urban and rural areas.

SNAP not only helps put food on the table, thereby improving food security and reducing food insecurity by up to 30 percent, but also plays a critical role in improving the health and well-being of low-income people by making nutritious, adequate food less expensive to purchase. Research has shown that SNAP also helps to reduce poverty and is linked to lower health care costs and improved health outcomes, in contrast to food insecurity, which increases the risk of adverse health outcomes and complicates the ability to manage illness. According to a 2018 report released by the Center on Budget and Policy Priorities, people in food-insecure households on average spend an estimated 45 percent more on medical care in a year than people in food-secure households. [Considerable research](#) shows that food insecurity is associated with behavioral, emotional, and academic issues in children and is linked to chronic disease factors. In fact, childhood food insecurity is often classified as an adverse childhood event and can have

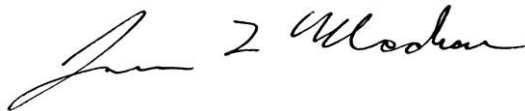
continuing effects in adulthood, including obesity, economic instability, depression, and lower educational achievement.

The stated purpose of the proposed rule is to close a loophole that allows states to make participants in certain programs “categorically eligible” to participate in SNAP “in order to preserve the integrity of the program,” according to Secretary of Agriculture Sonny Perdue. There is, however, no empirical evidence to support the claim that widespread abuse is negatively affecting SNAP’s integrity, rather only general “concerns” about program integrity expressed by auditors. Federal law includes a provision that lets states strengthen SNAP’s rules to encourage work and saving among low-income households, through a policy known as broad-based categorical eligibility (BBCE). In over 40 states, individuals can automatically qualify for SNAP benefits if they already receive benefits from certain other low-income assistance programs, such as the Temporary Assistance for Needy Families (TANF), without having to apply to determine their financial eligibility. States can use BBCE to raise SNAP income eligibility limits and less restrictive asset tests so that individuals can have some savings without losing SNAP benefits. In addition, the USDA allows schools to grant automatic eligibility for the NSLP to children of families participating in SNAP. The proposed rule would significantly narrow this policy, and cut off millions of needy households from basic food aid; children in families that lose their SNAP benefits would also lose access to free lunches and breakfasts at school, although the Administration failed to include the impact of their proposal on such children in the proposed rule’s regulatory impact analysis.

In proposing to curtail BBCE, the Administration is trying to do by executive fiat what Congress rejected in last year’s farm bill. In the name of program integrity, people will be harmed, including children, seniors, and people with disabilities. SNAP and the NSLP provide critically needed support to some of our most vulnerable patients and have decades of evidence showing that they work. The AMA urges you to withdraw this damaging proposal.

Thank you for considering our views. If you have any questions about this letter, please contact Margaret Garikes, Vice President, Federal Affairs, at margaret.garikes@ama-assn.org or 202-789-7409.

Sincerely,

A handwritten signature in black ink, appearing to read "James L. Madara". The signature is written in a cursive style with a large initial "J" and "M".

James L. Madara, MD