



1201 16th St., N.W. | Washington, DC 20036 | Phone: (202) 833-4000

Lily Eskelsen García
President

Rebecca S. Pringle
Vice President

Princess R. Moss
Secretary-Treasurer

Kim A. Anderson
Executive Director

October 23, 2019

SNAP Program Design Branch,
Program Development Division
Food and Nutrition Service, USDA
3101 Park Center Drive
Alexandria, VA 22303

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

Dear SNAP Program Design Branch:

Thank you for reopening the comment period regarding USDA’s Proposed Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program.

NEA members are teachers and education support professionals, including school food-service employees, in 14,000 communities across the nation. School employees know that when students go hungry, they cannot focus on learning. The proposed revision of categorical eligibility in the Supplemental Nutrition Assistance Program, according to USDA estimates, would deny food assistance to 3.1 million individuals—mostly families with children, older people, and people with disabilities.

According to the **USDA’s just-disclosed data**, the impact of revising SNAP categorical eligibility would be even more catastrophic than we at first believed. The new data indicate that USDA put forth this proposal without first having a full understanding of its impact, and this imprudence will harm many families and children.

Initially, USDA estimated that the rule change would mean that more than 500,000 children could lose access to free school meals. The new USDA analysis, however, paints a far bleaker picture: **Nearly 1 million children** who are now automatically eligible for free school meals because they live in SNAP households could be in jeopardy of losing those meals. Specifically, 497,000 children would move from receiving free meals to receiving reduced-price meals—placing additional financial pressures on already struggling, overburdened families—and 40,000 children would lose eligibility for free and reduced-price meals altogether.

This has the potential to undermine students' health and physical development and reduce their capacity for learning and engagement in school, all of which diminishes their chances of ending the cycle of poverty.

First line of defense against childhood hunger

Food insecurity is a major threat to the health and well-being of approximately 40 million people, or 12.5 percent of our population. It can lead to less educational attainment in children and negatively affect social, emotional, and cognitive development. SNAP, our nation's largest federal food assistance program, is the first line of defense against childhood hunger. The program provides low-income people with monthly funds—averaging about \$1.40 per person per meal—specifically designated for food purchases; 44 percent of SNAP beneficiaries are children.

A 2014 study found that participation in SNAP for six months reduced children's likelihood of food insecurity by approximately 33 percent. Although SNAP is a crucial safety net for working families, its benefits do not cover low-income working families' entire food bills. Free school meals help to fill the gap.

Broad-based Categorical Eligibility

Broad-based categorical eligibility (BBCE) allows households to qualify for SNAP if they already meet their states' criteria to receive a benefit or service through the Temporary Assistance for Needy Families program. In states that use BBCE, families can deduct child care, housing costs, and other high-dollar expenses, yet still be eligible for SNAP benefits based on their net income.

Children who live in SNAP households are directly certified—automatically eligible—for free school meals. Without categorical eligibility, 3.1 million individuals could lose SNAP benefits and—according to USDA's updated estimate—nearly **1 million students** could lose access to free school meals. This would be unconscionable, and unprecedented. On a typical day, according to USDA's 2018 school meal counts, more than half of 5- to 17-year-olds received a lunch, and more than 25 percent received a breakfast.

Direct certification saves schools time on enrollment paperwork, eliminates the possibility of paperwork errors that could incorrectly keep students from receiving free school meals, and brings into the program students whose families are eligible for food assistance but have not applied for aid. Also, because of the demand that most school nutrition programs be self-supporting, even a small drop in participation can have a negative impact on their stability. Ultimately, categorical eligibility ensures that fewer children fall through the cracks.

USDA predicates the proposed revision of categorical eligibility on concerns that BBCE has expanded the size of SNAP and resulted in benefits flowing to individuals who are not eligible for them. Yet, in a recent report based on USDA data from SNAP Quality Control, the Congressional Research Service found that categorical eligibility “has not resulted in large numbers of households receiving SNAP benefits who have gross incomes, as measured using SNAP income counting rules, exceeding 130% of poverty.”

Importance to Students of Federal Food Assistance and School Meals

Studies have linked healthy dietary behaviors with academic achievement, including higher grades. The 2015 National Youth Risk Behavior Survey (YRBS), conducted by the Centers for Disease Control, found that students with higher grades are more likely to eat breakfast daily. In addition, these students are more likely to:

- Eat fruit or drink 100-percent fruit juice at least once a day;
- Eat vegetables one or more times a day;
- Drink at least one glass of milk a day; and
- Avoid soda.

These are all characteristics of school meals.

Research also indicates that when students participate in school breakfast programs, their behavior, comprehension, and attendance improve. The CDC concluded that while the YRBS results do not prove causation, they provide evidence “of a significant association between academic grades and dietary behaviors.”

Losing access to free school meals would not only hurt the individual children who rely on them; this loss of access would jeopardize the free- and reduced-meal program for entire schools and/or school districts. Under Community Eligibility Provision (CEP), high-poverty schools and school districts can offer free meals to all students, and receive federal reimbursement, if at least 40 percent of the students are categorically eligible for free- or reduced-price school meals. This categorical eligibility hinges on families receiving SNAP or other federal assistance. Below the 40-percent threshold, however, schools do not have access to CEP.

A study last year by the Institute for Research on Labor and Employment found that when schools can offer free school meals to all students:

- The stigma of participating in the school meal program disappears, encouraging students to avail themselves of free meals;
- Errors in applications and other issues that can incorrectly exclude some students from free meals are no longer a factor;
- Children are better prepared to learn and participate in school activities;
- Students’ in-class behavior improves, increasing the time educators spend on teaching instead of discipline; and
- Families’ financial stress lessens.

Conclusion

In proposing to revise categorical eligibility in the Supplemental Nutrition Assistance Program, USDA focuses on the possible cost savings. However, the consequences—particularly for access to free school meals—would be devastating for children’s health, physical development and growth, and capacity for learning. As Diane Schanzenbach, who has studied the effects of free school meals, said in a recent interview: “When we spend on kids, part of that is an investment in the adult that they grow up to be.”

All students, regardless of where they live or their families’ financial circumstances, deserve the support to learn, and their chances for success should not be limited because they lack the nourishment required for healthy development. NEA strongly opposes revision of categorical eligibility—especially given the new USDA data that tell us the impact could be even worse than

we initially anticipated—because it would diminish our nation’s ability to achieve a top priority for us all: providing a healthy foundation for our children.

Sincerely,

A handwritten signature in black ink that reads "Marc Egan". The signature is written in a cursive, flowing style.

Marc Egan
Director of Government Relations
National Education Association

Broad-based Categorical Eligibility

Broad-based categorical eligibility (BBCE) allows households to qualify for SNAP if they already meet their states' criteria to receive a benefit or service through the Temporary Assistance for Needy Families program. In states that use BBCE, families can deduct child care, housing costs, and other high-dollar expenses, yet still be eligible for SNAP benefits based on their net income.

Children who live in SNAP households are directly certified—automatically eligible—for free school meals. Without categorical eligibility, 3.1 million individuals could lose SNAP benefits and—according to USDA's updated estimate—**nearly 1 million students** could lose access to free school meals. This is significant, because on a typical day, according to USDA's 2018 school meal counts, more than half of 5- to 17-year-olds received a lunch, and more than 25 percent received a breakfast.

Direct certification saves schools time on enrollment paperwork, eliminates the possibility of paperwork errors that could incorrectly keep students from receiving free school meals, and brings into the program students whose families are eligible for food assistance but have not applied for aid. Also, because of the demand that most school nutrition programs be self-supporting, even a small drop in participation can have a negative impact on their stability. Ultimately, categorical eligibility ensures that fewer children fall through the cracks.

USDA predicates the proposed revision of categorical eligibility on concerns that BBCE has expanded the size of SNAP and resulted in benefits flowing to individuals who are not eligible for them. Yet, in a recent report based on USDA data from SNAP Quality Control, the Congressional Research Service found that categorical eligibility “has not resulted in large numbers of households receiving SNAP benefits who have gross incomes, as measured using SNAP income counting rules, exceeding 130% of poverty.”

Importance to Students of Federal Food Assistance and School Meals

Studies have linked healthy dietary behaviors with academic achievement, including higher grades. The 2015 National Youth Risk Behavior Survey (YRBS), conducted by the Centers for Disease Control, found that students with higher grades are more likely to eat breakfast daily. In addition, these students are more likely to:

- Eat fruit or drink 100-percent fruit juice at least once a day;
- Eat vegetables one or more times a day;
- Drink at least one glass of milk a day; and
- Avoid soda.

These are all characteristics of school meals.

Research also indicates that when students participate in school breakfast programs, their behavior, comprehension, and attendance improve. The CDC concluded that while the YRBS results do not prove causation, they provide evidence “of a significant association between academic grades and dietary behaviors.”

Losing access to free school meals would not only hurt the individual children who rely on them; this loss of access would jeopardize the free- and reduced-meal program for entire schools and/or

school districts. Under Community Eligibility Provision (CEP), high-poverty schools and school districts can offer free meals to all students, and receive federal reimbursement, if at least 40 percent of the students are categorically eligible for free- or reduced-price school meals. This categorical eligibility hinges on families receiving SNAP or other federal assistance. Below the 40-percent threshold, however, schools do not have access to CEP.

A study last year by the Institute for Research on Labor and Employment found that when schools can offer free school meals to all students:

- The stigma of participating in the school meal program disappears, encouraging students to avail themselves of free meals;
- Errors in applications and other issues that can incorrectly exclude some students from free meals are no longer a factor;
- Children are better prepared to learn and participate in school activities;
- Students' in-class behavior improves, increasing the time educators spend on teaching instead of discipline; and
- Families' financial stress lessens.

Conclusion

In proposing to revise categorical eligibility in the Supplemental Nutrition Assistance Program, USDA focuses on the possible cost savings. However, the consequences—particularly for access to free school meals—would be devastating for children's health, physical development and growth, and capacity for learning. As Diane Schanzenbach, who has studied the effects of free school meals, said in a recent interview: "When we spend on kids, part of that is an investment in the adult that they grow up to be."

All students—no matter where they live or their families' financial circumstances—deserve the support to learn. Children's chances for success should not be limited because they lack the nourishment required for healthy development. NEA strongly opposes revision of categorical eligibility because it would diminish our nation's ability to achieve a top priority for us all: providing a healthy foundation for our children.

Sincerely,



Marc Egan
Director of Government Relations
National Education Association