

USDA's proposal to cut SNAP for low-income households: What you need to know

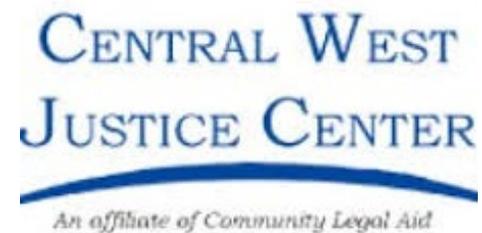
DANNY MINTZ, LOUISIANA BUDGET PROJECT

ERIN BROCK, FEEDING LOUISIANA

WEBINAR: AUGUST 29, 2019



Adapted from a presentation by
the Mass. Law Reform Institute
and Central West Justice Center



Webinar logistics

- If you have questions, type into the chat field on the bottom of the Zoom screen.
- We will follow up if there are questions we don't have time to answer.
- We are recording this presentation as a resource.

Webinar Goals

- **Overview of current “Broad Based Categorical Eligibility”**
 - What this policy actually means for low-income households
- **Proposed Rule Changes from Trump Administration**
 - National context & scope of harm
 - Impact in Louisiana - now and in the future
- **Why YOU are important and how to take action!**
 - File comments by September 23!

What is “Broad Based Categorical Eligibility”?

A longstanding federal SNAP option that allows states to:

- Use a gross income test above federal standard of 130% FPL - capped at 200% FPL.*
- Waive the SNAP asset test (\$3,500 for elder/disabled households and \$2,250 for other households).

*FPL = Federal Poverty Level; There is no gross income test for elder/disabled households

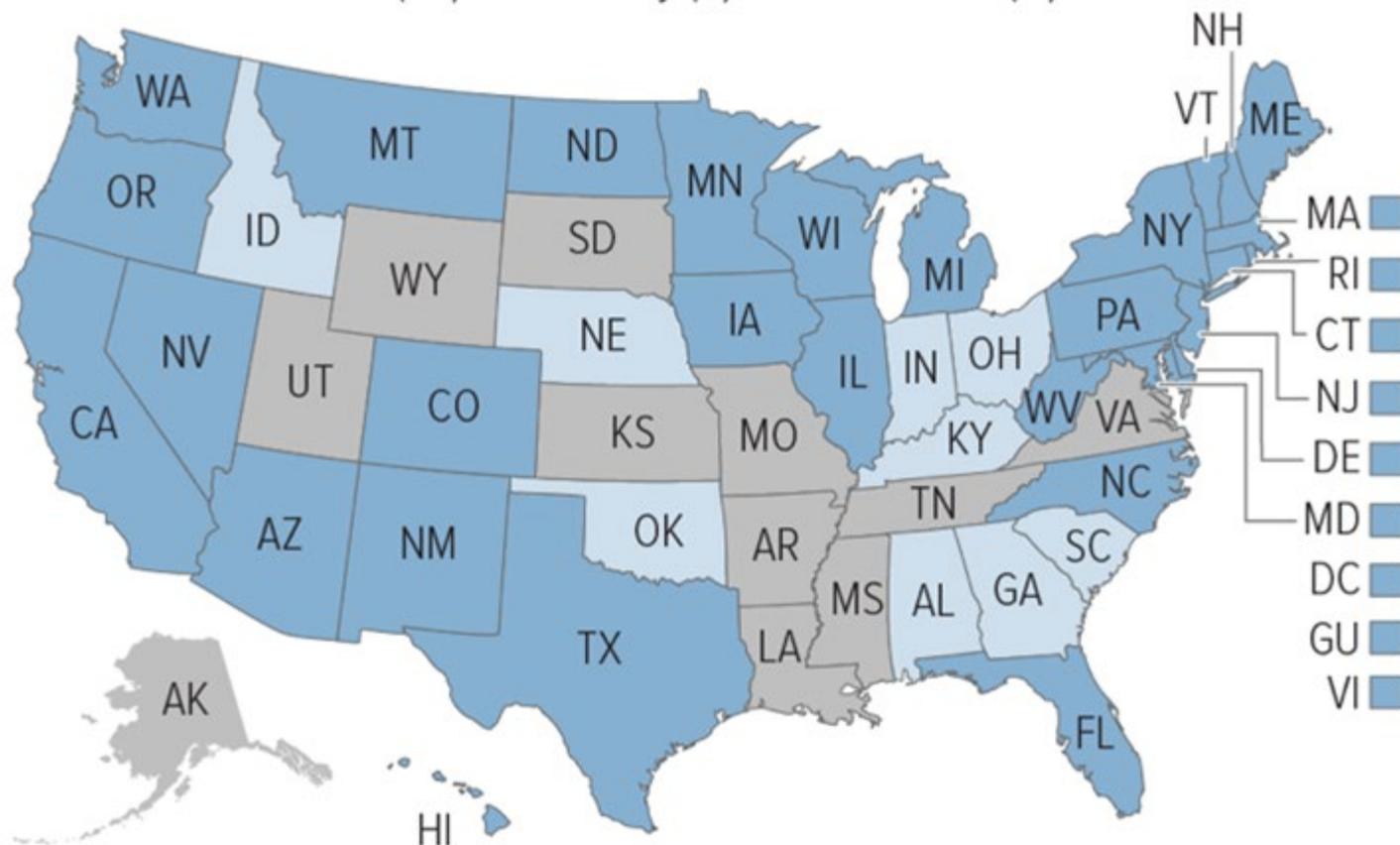
What's the difference in the gross income test?

Household size	130% FPL / month	200% FPL / month	What's the difference?
2	\$1,784	\$2,818	\$1,034/mo
3	\$2,252	\$3,555	\$1,303/mo
4	\$2,720	\$4,292	\$1,572/mo

How many states use this federal option?

Over 40 States Use Broad-Based Categorical Eligibility

■ Raise income and asset limits (33) ■ Raise asset limits only (9) ■ No BBCE policy (11)



Source: Department of Agriculture, "Broad-Based Categorical Eligibility," October 2018

- Over 40 states have elected to minimize the “cliff effect” on households and simplify administration of SNAP.

What is USDA proposing to do?

1. Deny SNAP to any low-wage working individuals or families with *gross* income above 130% poverty level – before any shelter or child care deductions

(Note: This will not affect households with elder or disabled individuals).

2. Impose the low asset tests for all households

What is USDA proposing to do?

Type of household	Highest Gross Income Test under BBCE	Proposed Gross income test	Asset Test under BBCE	Proposed Asset Test.
Families and individuals (not over 60, not disabled)	200% FPL	130%	No	\$2,250
Households with 60+ or disabled members	None	None	No	\$3,500

Impact on family of 3: Working Mom with 2 kids

Gross income Hourly wage @ 40 hours/week x 4.3 weeks	SNAP amount under BBCE (assumes she has high shelter costs & pays \$600/mo. in child care)	SNAP amount under proposed rule and current Louisiana rules
\$12/hr = \$2,079/mo	\$401/mo	\$401/mo - still eligible
\$14/hr = \$2,408/mo	\$322/mo	NO SNAP
\$15/hr = \$2,580/mo	\$281/mo	NO SNAP
\$18/hr = \$3,096/mo	\$130/mo	NO SNAP

Why is this SNAP state option important?

Increasing the gross income test...

- Reduces the “benefits cliff” – especially in areas with high housing and child care costs
- Supports work and lifts families out of poverty



\$963/mo: Average fair market rent for a 2 BR apartment in the New Orleans area

Source: U.S. Department of Housing and Urban Development



\$7,569/year: Median infant care cost in Louisiana’s urban areas

Source: 2017 Louisiana Childcare Market Rate Survey

Why is this SNAP state option important?

Waiving the asset test....



Simplifies SNAP administration and reduces agency red tape

Allows households to try to save/avoid debt or deal with an emergency – including seniors or persons with disabilities with a fixed income

Why is this SNAP state option important?

Connects families to additional benefits...

- Provides automatic free school meals (“direct certification”) for low income families
- Connects Louisiana families to utility discounts through LiHEAP



Why is this SNAP state option important?



NEWSROOM

DSS Implements Emergency Rules to Assist Louisiana's Coastal Families Affected by Gulf of Mexico Oil Spill

Rule will exclude business accounts, payments from BP as countable income

May 12, 2010

In an effort to aid fishermen and shrimpers affected by the oil spill, the Louisiana Department of Children & Family Services (DSS) issued an emergency rule today revising what income and assets can be counted to determine eligibility for the regular Supplemental Nutrition Assistance Program (SNAP), formerly known as food stamps, and other cash-based aid.

The Harm: National Numbers

- USDA estimates that **3.1M individuals would lose SNAP** including 1.9 million who live with kids, 600K adults 60+, and 300K households that include a disabled individual.
- Loss of \$25-30B in SNAP over the 10 years (\$3B/year).
- Ends free school meals for 500,000 children

Example of MA family harmed by gross income test

- Sarah works 2 jobs to provide for herself and 3 year old son.
- Earns \$2,060/mo gross.
- Sarah pays child care and \$1,300 rent, car insurance & gas to get to work
- In MA, she gets \$133/mo SNAP + qualifies for \$40/mo HIP benefit (MA farmers market match program).

Sarah would lose her SNAP under proposed rule, and would be ineligible under current LA policy. Gross income exceeds 130% FPL.



Example of MA family harmed by gross income test

- Carmen & husband have 2 kids. Both parents work in shipping/packaging, each make \$15/hr.
- Work hours vary depending on shifts assigned — some months income is below 130% FPL, some it is slightly over.
- Under the proposed rule, and current LA policy, Carmen's family will lose SNAP whenever their income goes over 130% FPL.



Example of MA family harmed by asset test



- Joel, Maria & son live doubled up with Maria's sister and her family. Maria works in the service industry, commutes 1.5 hours each way
- They have \$3,000 saved for first/last month's rent & security deposit to get an apartment closer to work.
- Under the proposed rules — and current LA policy — they would lose SNAP if \$2,250 SNAP asset test imposed.
- Losing SNAP means dipping into \$3,000 savings. Loss of SNAP keeps their family from moving forward.

Example of MA older adult harmed by asset test



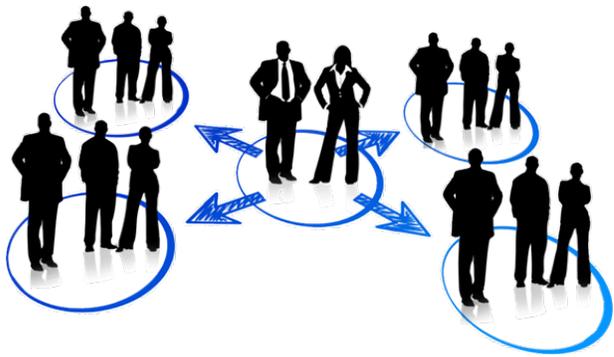
- Jane is 82, sole income is \$1,100 Social Security.
- She keeps \$4,000 in her bank account & refuses to touch it so her daughter can pay for burial/funeral costs. No other assets.
- Jane has a heart condition, and her doctor told her she needs to eat healthier foods.
- Could not afford her rent + transportation + healthier foods without SNAP. Jane would be denied SNAP with \$4,000 in the bank — and currently is ineligible for SNAP in Louisiana.
- In MA, Jane is currently eligible for \$100/mo SNAP + \$40 HIP benefit
- Jane's health gets worse because she does not have SNAP.

Why do we need YOU?

- ❖ Comments are an effective tool to make sure your voice is heard in any government rule change.
- ❖ USDA must review every unique comment it gets.
- ❖ Comments help focus public attention on an issue, and may help with legal challenges in court.



The DOs of commenting!



- ✓ Tell USDA what your organization does, your mission, who you serve.
- ✓ Talk about your community – why is it hard for low- wage working families to get by?
- ✓ Share stories/struggles of those who are working but need help from SNAP

The DON'Ts of commenting!

- ✓ DON'T Feel like you need to be an expert!
- ✓ DON'T Hesitate to reach out! LBP and Feeding Louisiana are here to help.



How to comment!

- Templates for organizations: Add original text about your organization, who you serve, and your concerns.
- Comment platform for individuals: HandsOFFSNAP.org
- Go to Regulations.gov to post comment directly

Quick Tips on Mobilizing your Community



Action Alerts: Engage your Stakeholders

Identify allies:

- Volunteers and Donors
- Partner Agencies
- Board Members
- Faith-based community members
- Health care providers
- School nutrition directors, teachers, nurses
- Farmers and grocers

Create An Action Alert

An “Action Alert” should:

- Simplify the issue
- Speak to why stakeholders should care about it
- Identify one concrete action step and a deadline

Example for this proposed rule:

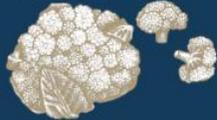
A new proposed rule from the Trump administration would take away critical food benefits from approximately 3 million people in the United States - including the loss of free school meals for half a million children.

You can help stop this change by sending a comment to USDA before September 23, 2019.

Take Action Today!



KEEP SNAP STRONG



WORCESTER
COUNTY
FOOD
BANK
Creating a hunger-free community

Dear Gina,

A new federal proposal threatens SNAP access for 3.1 million people in the U.S., including 90,000 in MA. It also jeopardizes school meals for thousands of children.

We need YOUR help to stop it.

The United States Department of Agriculture (USDA) wants to end a flexibility option that more than 40 states, including Massachusetts, use to ensure low-wage working families are not excluded from the Supplemental Nutrition Assistance Program (SNAP). This would cut millions of people off SNAP, including:

- Families with gross income above 130% FPL - that's \$27,024 for a family of three.
- Seniors, persons with disabilities and families trying to save for emergencies.

In addition:

- Children in households where SNAP benefits are cut would lose automatic eligibility for free school meals.
- Massachusetts families using the Healthy Incentives Program (HIP) will lose their HIP if their SNAP benefits stop.

The Background

Under longstanding Supplemental Nutrition Assistance Program (SNAP) rules, states, including Massachusetts, have flexibility on some SNAP gross income and asset rules. (SNAP benefits are still based on net income below the poverty level.) Gross income

Comment Today!

The USDA needs to hear from you about why this proposal is harmful. Click [HERE](#) to submit your comment on Feeding America's platform. You can start with their template and add your own thoughts. Make sure at least one third of your comment is in your own words so it will be counted as a distinct comment.

If you want support writing your comment, join us this coming Wednesday, August 21st, anytime from 4:30-7pm, at Nu Kitchen in Worcester (335 Chandler Street).

Tips:

- Explain why you oppose this proposal and are concerned about its impact.
- Consider telling a short story that shows the importance of SNAP, particularly for working families with gross incomes slightly above 130% FPL.
- Make sure to explicitly ask the USDA to NOT enact this proposal and to leave existing regulations in place.

**If you are uncomfortable sharing your name in your comment, you can ask someone else to submit your comment on your behalf. You can include contact information but this is not required.*

If you have any questions, please contact us.

[Let us know you took action!](#)

If you've been following the recent news about the "public charge" rule, you may be feeling disheartened. We want you to know that your comments opposing this rule did matter and provided the basis for lawsuits aimed at stopping it. We need to keep speaking up. You can learn more and read WCFB's response to this rule [HERE](#).

Thank you so much for YOUR commitment to ending hunger in Worcester County!



Maggie Cawley
Advocacy Coordinator
Worcester County Food Bank
mcawley@foodbank.org

From: Plata-Nino, Gina
To: 'Marguerite Cawley'
Cc:
Subject: Webinar & Comment Gathering to Help Prevent Cuts to SNAP

Sent: Mon 8/19/2019 9:09

Message  Protect SNAP for families.pdf (2 MB)

Dear Central MA SNAP Coalition,

As a reminder, the USDA has proposed a rule which drastically limits "categorical eligibility" and would end SNAP for over 8.1M households nationally. It would severely restrict the ability of states like MA to have a higher initial gross income test and/or waive the low asset test for low income households. This will particularly affect low-income working families with costly housing and child care, older Americans and persons with disabilities with modest savings. It would also drastically affect children in these households by decreasing their access to nutritious food and taking away free school meals.

To learn more about what this harmful rule would do and how to take action before the comment deadline of September 23, join us on August 21 to jointly file comments together and on August 22 to learn more about the rule via webinar. Please see below:

Webinar

- MLRI and CVJC are hosting a webinar to give an overview of what this extremely harmful proposed rule would mean in Massachusetts - and share what action you can take to oppose cuts to SNAP. The webinar will be on **Thursday, August 22 from 11 AM to Noon**. Please register by [clicking here](#).

Comment Party

- If you live/work near Worcester we invite you to join us on **Wednesday, August 21, from 4:30-7:00 pm to jointly submit comments**. We will be meeting at NuKitchen, 335 Chandler St, Worcester. We will guide you through the simple process, provide light refreshments and laptops. Feel free to stop any time. In less than 20 minutes you can speak up and protect SNAP. Please share the attached flyer with your networks.

Please let us know if you have any questions.

Many thanks,

Gina and Maggie

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Make it pro-active and engaging

Comment parties: Hold an event, or tag onto an existing event and create a space for people to take action. Create a space where that does not feel too overwhelming and intimidating:

- have food,
- Laptops or computers,
- talking points,
- blank paper for jotting down ideas, and
- people available to talk through a draft comment.

Other group events: Letter to the Editor writing, phone banking (calling legislators about an issue), sign-making for a rally or event.

Doing things in groups is fun, builds confidence, and builds connections between people.



WE NEED YOU!

HELP US PROTECT FOOD ACCESS FOR 3.1 MILLION PEOPLE

Join us to submit public comments to oppose a harmful federal proposal which would take away SNAP from:

- Low-income working families with costly housing and child care
- Older Americans and persons with disabilities with modest savings

It would also drastically affect children in these households by decreasing their access to nutritious food and taking away free school meals.

WHEN: AUGUST 21, 4:30-7:00 PM

WHERE: NU KITCHEN, 335 CHANDLER ST, WORCESTER (BACK AREA OF THE CAFE)

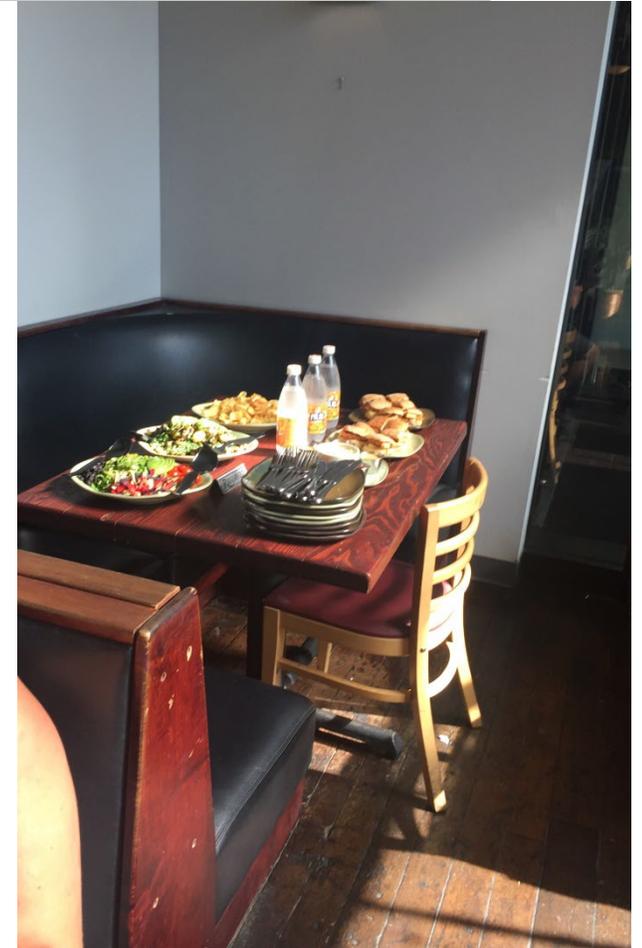
We will supply laptops, light refreshments, and comment-writing tips.



Service and Faith-based organizations



Public space- neighborhood cafe



Resources/Contact Info

- CBPP overview of policy & harm: [CBPP.org/research/food-assistance/snaps-broad-based-categorical-eligibility-supports-working-families-and](https://www.cbpp.org/research/food-assistance/snaps-broad-based-categorical-eligibility-supports-working-families-and)
- FRAC impact on school meals: [FRAC.org/blog/broad-based-categorical-eligibility-and-school-meals](https://www.frac.org/blog/broad-based-categorical-eligibility-and-school-meals)
- Social Media: Follow [#HandsOffSNAP](https://twitter.com/HandsOffSNAP) and [#ProtectSNAP](https://twitter.com/ProtectSNAP) on Twitter
- Contact Louisiana Budget Project: Danny Mintz, 786.374.6626 (cell) or danny@labudget.org
- Contact Feeding Louisiana: Erin Brock, 410.598.9865 (cell) or erin@feedinglouisiana.org