NWA Template Comments on SNAP Benefits Cut
Comment Period Closes: Monday, December 2, 2019

Thank you for taking the time to submit a comment to USDA’s Food and Nutrition Service (FNS) regarding the third proposed rule this year that would cut SNAP benefits. Below are template comments that will help you weigh in on the latest proposal that could impact WIC families. Comments must be submitted here by December 2, 2019.

In this proposed rule, USDA seeks to eliminate state discretion in calculating the Standard Utility Allowance (SUA) – an adjustment to a family’s SNAP benefits that accounts for the costs of certain non-food household expenditures, namely utilities. By removing state discretion, USDA estimates that 19% of SNAP households will end up with a smaller monthly SNAP benefit. Overall, this policy change will result in a national net cut to SNAP benefits of $4.5 billion over five years.

SNAP access often complements the nutritional needs of WIC families, providing additional support to round out the full basket of foods. For this reason, Congress specifically included SNAP as an adjunctively eligible program for WIC participants.

If you are experiencing difficulty in forming or submitting your comment, please contact Brian Dittmeier for assistance at bdittmeier@nwica.org.

As you prepare your comments, please:

- **Write comments in your own words.** FNS must review every unique comment; therefore, it is helpful if you modify the template language to include your own thoughts and perspectives. The template highlights in yellow particular opportunities to add your own thoughts. You are encouraged to modify the template language to reflect your own voice.

- **Attach research, data, testimonials, or other supporting documents.** If you have research, data, or testimonials that are unique to your comment, you can include these additional resources as an attachment to ensure that they are included in FNS’s record.

- **If you have credibility in an issue area, say so.** It is important to provide context as to why you are weighing in on FNS’s proposed changes. If you have specific expertise, please explain why you are uniquely qualified to offer your thoughts on this matter. As a WIC recipient or service provider, you have credibility to weigh in on this issue!

Once again, thank you for weighing in on this important issue!
SNAP Certification Policy Branch  
Program Development Division  
Food and Nutrition Service / USDA  
3101 Park Center Dr.  
Alexandria, VA 22302

RE: FNS 2009-0009; RIN 0584-AE69  
Supplemental Nutrition Assistance Program: Standardization of State Heating and Cooling Standard Utility Allowances

Dear Program Design Branch,

[WIC is a targeted, time-limited program, and families will often turn to SNAP to round out a full basket of foods. SNAP has a proven record of reducing food insecurity, particularly in households with children. A mere six months of participation in SNAP is shown to reduce the likelihood of food insecurity by one-third, compared to similarly situated households. [Add stories/testimonials of how SNAP has benefitted the families that you work with; or data demonstrating how many WIC families in your agency also rely on SNAP]

This latest proposed rule to alter SNAP would disproportionately impact women and children, forcing families to choose between feeding their kids or heating their homes. Overall, the proposed rule will leave 8,000 families without access to SNAP and cut benefits by $4.5 billion over five years. Women constitute approximately 63% of adult SNAP recipients and are more likely to be affected by the proposed rule. Of the nearly 7 million individuals that will be affected by this policy change, an estimated 68% live in households with children. The proposed rule estimates that these families will face an average benefit loss of $28 per month – a significant decrease when families are already stretching SNAP dollars to last through a whole month.

USDA does not appropriately articulate why a national standard is necessary. State discretion for utility allowances has permitted variation for good reason – of course, an individual’s heating and cooling costs will vary based on climate and geography. The proposed caps will be lower than existing allowances in over two-fifths of the states, forcing more families to make difficult choices without any adequate justification.]
The proposed rule does not enhance the delivery of SNAP benefits; instead, it cuts benefits and leaves families with fewer resources to support their children. As a result, I strongly urge USDA to withdraw the proposed rule.

Thank you for consideration of our comments.

Sincerely,

[Name
Title
Agency]