



September 1, 2019

Secretary Sonny Perdue
U.S. Department of Agriculture
Washington, D.C.

Re: Revision of Categorical Eligibility of Supplemental Nutrition Assistance Program (SNAP)

DALLAS COALITION FOR HUNGER SOLUTIONS (“DCHS”) appreciates the opportunity to provide comments to the proposed regulations that revise categorical eligibility rules used by states in the determination of SNAP benefits.

DCHS is a broad-based coalition of non-profit, governmental, and faith-based organizations that operate and serve in the Dallas County, Texas area. The mission of DCHS is to *empower all residents of Dallas County to gain equal access to healthy food*. We convene leaders across the Dallas County and greater North Texas communities to develop strategies, implement programs, and advocate for substantive public policies that relieve poverty and hunger and improve access to a healthy and nourishing diet for all.

DCHS opposes the proposed revisions to the categorical eligibility rules for SNAP posted on July 24, 2019.

We are joined in our opposition to the proposed regulations by the undersigned North Texas organizations and individuals who have authorized their support of this public comment.

SNAP is our nation’s and our state’s number-one anti-poverty program. The monthly food support provides nutrition for thousands of hard-working Texas families, keeping food on their tables. The SNAP program serves approximately 1.5 million Texans (333,000 in Dallas County alone) and contributes \$383.4 million to the Texas economy per month. The proposed rule would eliminate our state’s flexibility to administer SNAP most effectively for Texans, and remove tens of thousands of Texas citizens from nutritional support.

The state of Texas is one of the 42 states that has adopted the Broad-Based Categorical Eligibility option permitted under federal law. Under our Broad-Based Categorical Eligibility rules, Texas already judiciously administers its SNAP program by imposing strict work, income, and asset tests for all SNAP applicants and recipients. Our state policy makers have concluded that a household who qualifies for a benefit or service under the *Temporary Assistance for Needy Families (TANF)* program is automatically eligible for SNAP benefits, **but only provided that** they apply and meet other state-set requirements:

- **WORK REQUIREMENTS:** Most SNAP recipients in Texas between the ages of 16 and 59 must meet stringent state work requirements to retain their benefits; able-bodied adults without children in the home must work or be in a job-training program at least 20-hours per week in order to receive SNAP benefits for more than 3 months in a 36-month period.

- **INCOME RESTRICTIONS:** SNAP recipients not have gross income that exceeds 165% of the federal poverty line [\$42,000 for a family of four]; and
- **ASSET TEST:** SNAP recipients are limited to household assets that do not exceed \$5,000, subject to the exception approved by the Texas state legislature, that excludes from the asset limitation test an automobile valued up to a \$15,000.

In addition, Dallas Independent School District and other area school districts including Garland ISD and Fort Worth ISD, use SNAP enrollment data to qualify their districts for the Community Eligibility Program, a reimbursement option of the National School Lunch Categorical Eligibility Program. Through this program, school-children district-wide receive access to free or reduced school breakfast and lunch, without having to submit additional paperwork. This saves the schools significant administrative costs each year and allows the school districts to assure that our children have the nutrition they need to perform successfully in school. With fewer households enrolled in SNAP, children who live in districts that lose their Community Eligibility would lose what are oftentimes the only substantial meals they receive all day, negatively impacting their education, physical health, and overall wellbeing.

Elimination of the Broad-Based Categorical Eligibility option would :

- Deprive the state of its rights to determine how the SNAP program is administered in Texas;
- Eliminate Texas' flexibility to declare automatic eligibility for SNAP when households qualify for TANF;
- Increase administrative burdens both for the Texas Department of Health and Human Services and for low-income, working families;
- Change the income limit to 130% of the federal poverty line, automatically striking 125,000 hard-working Texans from SNAP enrollment. Families who lose their SNAP benefits will be forced to make choices between food and other vital necessities such as medicine, rent, car payments etc.;
- Change the asset restriction test to \$4,650, making ownership of reliable transportation - a necessity to sustain a job in both our rural and urban areas that do not have adequate public transportation - difficult. This would create an impediment to work and gaining self-sufficiency.. Unreliable transportation hinders the ability to keep a stable job;
- Increase food insecurity in families with children; 81% of families in Texas that receive SNAP have children;
- Decrease the ability of many North Texas children to receive school meals, impacting their health and educational performance, and their long-term potential for work and self-sufficiency;
- Decrease local food retailers gross sales and adversely impact local tax bases; and
- Apply stress to the emergency food network of food banks and food pantries who would shoulder the burden of replacing meals for those who lose their SNAP benefits.

The Dallas Coalition for Hunger Solutions and the undersigned organizations and individuals respectfully appeal to you to abandon the proposal to revise the categorical eligibility rules for SNAP and to, instead, seek ways to strengthen SNAP to support working families who are striving for greater economic independence.

Respectfully submitted,

DALLAS COALITION FOR HUNGER SOLUTIONS

By: Sara Albert, Chair, Public Policy Action Team