



CALIFORNIA HEALTH AND HUMAN SERVICES AGENCY

Office of the Secretary

September 11, 2019

Via Federal eRulemaking Portal

The Honorable Sonny Perdue
Secretary
United States Department of Agriculture

RE: Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program.
FNS Docket ID: FNS-2018-0037

Dear Secretary Perdue,

As Secretary of the California Health and Human Services Agency I write in opposition to the proposed changes to the broad based categorical eligibility option in the Supplemental Nutrition Assistance Program (SNAP). I strongly believe that food security is key to an individual's ability to gain adequate employment, achieve and retain self-sufficiency, and to enhance the health and well-being of children and families.

By way of background, I oversee the Agency's twelve statewide Departments and five Offices, along with various Boards and Commissions. Our Departments provide significant programmatic resources through the delivery of both short-term and longer-term public benefits, including food assistance, child care, health care coverage, housing support, employment support, child support services, child welfare, and many more.

Prior to becoming Secretary, I practiced as a pediatrician in Los Angeles County where my patients were children from low-income families who benefited from programs like SNAP, known as CalFresh in California. I saw firsthand the impact the lack of access to nutrition assistance had on a child's health and development. My personal experiences as a physician are not unique. In fact, the research suggests that improving access to healthy foods and reducing food insecurity is how we can address health disparities and improve health outcomes.

In California, CalFresh is overseen by the State and is administered by our 58 County Health and Human Services Agencies. CalFresh provides nearly 4 million Californians, including 2 million children, with food benefits each month. These benefits are spent at grocery stores and farmers' markets across the state, generating more than \$11 billion in economic activity annually.

The categorical eligibility option was designed to give states the ability to reduce duplicative financial eligibility determinations, reduce administrative costs, ensure people in need receive necessary nutrition assistance, and increase eventual self-sufficiency. However, if implemented in its current form, the Proposed Rule will leave thousands of children without free school meals, be the catalyst for significant financial losses to the state's retail and agricultural industries that contribute to the California economy, and will impose unreasonable, unnecessary and costly administrative burdens on the state and county agencies.

Simply put, the proposed changes will increase poverty in California and harm low-income working families and children. The data are clear. In 2015, CalFresh moved roughly 800,000 Californians out of poverty. The program lowered the poverty rate by 2.1 percentage points, this is more than any other safety net program.¹ Among children, the data suggest a stronger impact, with roughly 363,000 children moving out of poverty as a result of CalFresh, this is an average of 4.0 percentage points in poverty reduction.²

Additionally, data released by the U.S. Department of Agriculture suggests that the increase in benefits as part of the American Recovery and Reinvestment Act of 2009 saw a decline in food insecurity among low-income household by 2.2 percentage points in a single year.³ These data suggest that the program is not only ensuring that low-incomes individuals have access to food, but they also suggest that it is helping move families and children out of poverty.

Under the current rules, low-income working families with children have the ability to work, save money, and still remain under the CalFresh net income limit. Forcing states to broadly apply a lower gross income standard would result in many families losing access to nutrition assistance both at home and, for the children at school, negatively impacting the health and well-being of individuals, especially children who need healthy foods for proper physical and mental development.

I urge you to immediately withdraw the Proposed Rule to ensure that vulnerable families and children in California, and across the United States, have the ability to access nutrition assistance in order to improve health and well-being. If you should need additional information, please feel free to contact Marko Mijic, Deputy Secretary for Program and Fiscal Affairs. You can reach him by email at marko.mijic@chhs.ca.gov or by phone at 916-548-7069.

Sincerely,



Mark Ghaly, MD, MPH
Secretary

¹ Danielson, Caroline. *Just the Facts: The CalFresh Food Assistance Program*. Public Policy Institute of Californian, February 2018.

² Ibid. 1.

³ Nord, Mark, and Mark Prell. *Food Security Improved Following the 2009 ARRA Increase in SNAP Benefits*, ERR-116, U.S. Department of Agriculture, Economic Research Service, April 2011.