



The Education Trust

Closing the gaps in opportunity and achievement, pre-K through college

September 23, 2019

Brandon Lipps
Deputy Under Secretary Food, Nutrition, and Consumer Services
Food and Nutrition Service (FNS)
United States Department of Agriculture (USDA)
3101 Park Center Dr.
Alexandria, VA 22302

RE: Docket ID: FNS-2018-0037

Dear Mr. Lipps,

On behalf of The Education Trust, an organization dedicated to closing long-standing gaps in opportunity and achievement that separate students from low-income families and students of color from their peers, thank you for the opportunity to submit comments regarding the Administration's proposed changes to categorical eligibility as it pertains to Supplemental Nutrition Assistance Program (SNAP) benefits under Section 5(a) of the Food and Nutrition Act of 2008.

In an effort to reduce stigma around food insecurity, the food assistance program for low-income families established through the Food Stamp Act of 1977, was [renamed](#) "SNAP" in the Food, Conservation and Energy Act of 2008. Since its renaming, SNAP has [helped](#) approximately 40 million people a year access and afford food to nourish and sustain their families. Of the 40 million SNAP recipients, [20 million of those are children](#) — approximately 25 percent of all children in the United States.

The impact of SNAP benefits for families and children has been, and continues to be, substantial. The National Women's Law Center [found](#) that, in 2016, SNAP kept almost three million people out of poverty — over one million of those shielded from poverty were children and nearly 70 percent were children of color. While No Kid Hungry [reports](#) that more than 12 million children live in food insecure homes, [recent research](#) from the Center on Budget and Policy Priorities reveals that "food insecurity among children fell by roughly a third after their families received SNAP for six months." For young children in families with access to SNAP, the research shows "[lower risk for developmental delays,](#)" "[improved high school graduation rates, adult earnings, and adult health.](#)"

The Department's proposed changes to categorical eligibility would deny states the ability to automatically enroll low-income families in SNAP if they are eligible to receive other non-cash benefits (such as childcare, transportation, job training, etc.) under the Temporary Assistance for Needy Families (TANF) program. This proposal, should it go into effect, [will kick an estimated three million Americans out of the SNAP program](#) — a decision that would devastate families and make it harder for children to access adequate nutrition.



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Changes to categorical eligibility will result in millions of families losing access to SNAP benefits, leaving a devastating number of children continuously vulnerable to hunger and malnutrition.

The [research](#) is clear: students cannot learn if they are hungry. The Food Research and Action Center (FRAC) [notes](#) that a child's participation in a school lunch program reduces food insecurity, improves the quality of their diet and combats obesity, and leads to better academic performance and improved attendance. Other [studies](#) confirm that increasing students' access to nutrition through school breakfast and lunch programs can [improve test scores](#).

Given that SNAP benefits one out of every four children in the United States, and that science continues to demonstrate that children's ability to learn and grow is stunted without access to adequate food, Ed Trust is committed to calling on lawmakers to *increase* access to food assistance programs for children — a recommendation in direct conflict with the proposed changes to categorical eligibility. This Administration's proposal represents a missed opportunity to invest in what has been shown to improve student learning, and academic and health outcomes, in addition to deeply harming millions of families and their children in the process.

The Department's proposal means more children and families will face increased bureaucratic hurdles to obtain the free and reduced-price lunch for which they are eligible.

In all states, SNAP eligibility can also determine whether a child receives free and reduced-priced lunch (FRPL) and other meals provided by schools and districts before and during the school day, as well as during the summer months to ensure that children in the community have access to a consistent, stable diet. SNAP eligibility does this by automatically making children receiving such benefits eligible for meals during the school day and summer months.

Nearly 20 million children [receive a completely free lunch](#) at school. For these children, along with other children who are eligible for a reduced-price lunch, this may be their only opportunity to receive a substantial or healthy meal for the entire day. The fact is [many families struggle](#) to afford or access healthy meals. This Administration's efforts will undermine families' ability to obtain FRPL through SNAP, resulting in more children being forced to forego their only option for a stable meal. In addition, families removed from the SNAP program but still eligible for FRPL will face increased hurdles in proving their child's eligibility for food assistance, resulting in [fewer students enrolling in the FRPL program and increased stigma](#).

The loss of these benefits could reintroduce the same stigma that Congress sought to eliminate in 2008. For instance, if students are not able to access such benefits, they are at greater risk of "[lunch shaming](#)," that is, taking steps to publicly humiliate children by serving them alternative meals or threatening families who have overdue lunch charges. Just recently, a handful of states came under scrutiny for this



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practice. In one of Pennsylvania's lowest-income school districts, 40 families late on their lunch balance received a [letter](#) in July 2019 stating that failure to pay the debt could lead to their children being removed from their homes and placed in foster care.

The [stigma surrounding lunch shaming](#) can lead to chronic absenteeism, declines in student performance in the classroom, and/or increased anxiety and other mental health concerns.

Changes to categorical eligibility will impact students attempting to access federal financial aid for higher education.

Young children are not the only ones affected by the Administration's proposed changes. Students in families making less than \$23,000 a year and who are eligible for a means-tested public benefit such as SNAP automatically receive a "zero" for the Expected Family Contribution (EFC), which is used to calculate the amount of a Pell Grant or other Federal Student Aid a student may receive. Without SNAP eligibility, impacted students could receive significantly less financial aid to attend college.

Should the Department implement the proposed changes to categorical eligibility of SNAP, millions of children would lose access to food assistance benefits and thousands more would face increased barriers to free and reduced-price meals. In addition, low-income students might be deterred from pursuing higher education because of a lack of adequate access to financial aid. Such changes would widen the opportunity and achievement gaps that are the result of students from low-income families and students of color consistently being underserved in our nation's schools. **Therefore, we urge the Department to withdraw this proposed rule and cease further action on this matter.**

Thank you for the opportunity to comment on this important topic.

Sincerely,

John B. King Jr.
President and CEO
The Education Trust