



August 15, 2019

Submitted via [www.regulations.gov](http://www.regulations.gov)

Program Design Branch and Program Development Division  
Food and Nutrition Service, USDA  
3101 Park Center Dr., Alexandria, VA 22302.

Re: Docket ID Number [FNS-2018-0037] Revision of Categorical Eligibility in the Supplemental Nutrition Assistance

I am writing on behalf of the Kalamazoo Community Foundation regarding the United States Department of Agriculture (USDA) and the Food and Nutrition Service (FNS) Division's proposed amendment to Section 5(a) of the Food and Nutrition Act of 2008. We stand in opposition to the amendments proposed that will limit the ability for families living in low-income households to access food through a streamlined process. These amendments have the potential to disrupt the lives of children and families while worsening the state of food insecurity in our community. As a community foundation, we invest heavily in programs and services that address food insecurity and food access in our community and our investments in this sector play a role in filling the inadequacies of state funding for food and nutrition services. Due to our investment priority of education, we invest with the recognition of the intersection between food access and educational outcomes. For these reasons, we urge the proposed rule to be withdrawn in its entirety and that FNS's long-standing policy of Broad-Based Categorical Eligibility (BBCE) remain in effect.

With the support of the BBCE, Michigan is one of many states that have increased the gross income and asset limits for families who are impacted by small increases in wages that place them above the 130% of poverty level requirement for SNAP benefits. Without this rule in place, Michigan would lose the ability to continue providing families the opportunity to phase out of food assistance as their income rises. This abrupt removal of food assistance will have significant implications for families who have children living in the household. Food insecurity and a lack of access to healthy foods for children have been linked to academic, behavioral, and social and emotional difficulties for those children, ultimately playing a role in the disparities in educational achievement for low-income children. In Michigan, 62% of the households that receive SNAP benefits are households with children<sup>1</sup>. Currently, children who live in households that receive SNAP benefits because of BBCE are also automatically eligible to receive free and reduced lunch in school. In our community, this equates to 8,760 (or 16%) of children in Kalamazoo who face threat of losing free breakfast and lunch meals in school.<sup>2</sup>

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<sup>1</sup> <https://www.cbpp.org/research/a-closer-look-at-who-benefits-from-snap-state-by-state-fact-sheets#Michigan>

<sup>2</sup> [https://public.tableau.com/profile/feeding.america.research#!/vizhome/2017StateWorkbook-Public\\_15568266651950/CountyDetailDataPublic](https://public.tableau.com/profile/feeding.america.research#!/vizhome/2017StateWorkbook-Public_15568266651950/CountyDetailDataPublic)

With 38,000 food insecure households in Kalamazoo and 31,000 receiving SNAP benefits there continues to be a gap in access to SNAP benefits and the addition of this amendment will only worsen the discrepancy. In Michigan, state funding for access to healthy foods has been minimal and most programs rely on federal or philanthropic dollars. The Congressional Budget Office (CBO) has estimated that BBCE accounts for only about 2 percent of SNAP costs and about 5 percent of SNAP participation.<sup>3</sup> Not only does BBCE streamline the already rigorous process of receiving government assistance for families that have already demonstrated a need through receiving Temporary Assistance for Needy Families (TANF), this process reduces wait times for families to be approved for benefits.

We recommend FNS maintain the current practice of Broad-Based Categorical Eligibility (BBCE) and strongly urge the administration to reassess the impact of cuts to this safety net program to ensure that families, individuals and children across the country have access to a program that allows them to reach their full potential.

Sincerely,



Carrie Pickett-Erway  
President/CEO  
Kalamazoo Community Foundation



Martha Gonzalez-Cortes  
Vice President of Community Investment  
Kalamazoo Community Foundation

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<sup>3</sup> <https://www.cbo.gov/system/files/2019-05/55215-snap.pdf>

