



September 23, 2019

SNAP Program Design Branch
Program Development Division
Food and Nutrition Service
3101 Park Center Drive
U.S. Department of Agriculture
Alexandria, Virginia 22302

RE: Proposed Rule: Notice of Proposed Rule Making – Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP) RIN 0584-AE62

Dear SNAP Program Design Branch:

On behalf of the National Alliance on Mental Illness (NAMI), we appreciate the opportunity to comment on USDA's Notice of Proposed Rule on Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP). As the nation's largest grassroots mental health organization dedicated to building better lives for the millions of Americans affected by mental illness, NAMI is deeply concerned that the proposed changes would cause serious harm to these individuals, their families, and their communities. Therefore, we urge the USDA to retract this proposed rule and continue providing states the flexibility needed to best meet the needs of SNAP participants.

Food insecurity is important for people with mental health conditions, who are more likely to be unemployedⁱ and count on SNAP when they may be underemployed, in between jobs, or caring for family members. SNAP is also helpful for those who may not qualify for disability benefits or who have not completed the often-lengthy process to obtain disability benefits.

Current federal law provides SNAP benefits to households with income at or less than 130 percent of the federal poverty limit. Under federal policy known as Broad-Based Categorical Eligibility (BBCE), state governments may provide SNAP waivers to TANF-supported households with income up to 200 percent of the federal poverty limit that demonstrate categorical need. More than 40 states use BBCE to better support families with lower incomes,ⁱⁱ allowing them to serve more working households that have significant expenses for housing and childcare.

The proposed rule would limit states' ability to enroll families in SNAP through BBCE, and, by extension, have widespread eligibility implications for the National School Lunch Program (NSLP). This would eliminate SNAP benefits for 3.1 million individualsⁱⁱⁱ and 500,000 children receiving free school meals.^{iv} By USDA's own estimates, the proposed rule would cut SNAP benefits over five years by \$10.543 billion, while increasing SNAP administrative costs by \$2.314

billion.^v According to the USDA, “The proposed rule may also negatively impact food security and reduce the savings rates among those individuals who do not meet the income and resource eligibility requirements for SNAP or the substantial and ongoing requirements for expanded categorical eligibility.”

NAMI is concerned that for children and adults with serious health conditions like mental illness, limiting access to nutrition assistance could have serious repercussions for their health and negatively impact their emotional and psychological stability. Among adults with a serious mental illness, those with very low food security have higher odds of not being able to afford mental health care, and lower odds of utilizing mental health services than those who are food secure.^{vi} Sadly, we know what happens when people with mental illness don’t get treatment they need; they can end up in jail or on the streets – with worse long-term individual outcomes, greater pain for their families and a greater cost to the state and the federal government. And even for those who do not have mental illness, dealing with food insecurity can bring about poorer mental health that may contribute to anxiety and depression in adults^{vii} and emotional problems among adolescents.^{viii}

NAMI is also concerned that the proposed rule will disproportionately affect communities that have been involved in the criminal justice system. About one in three people incarcerated in state and federal prisons have a diagnosed mental health condition,^{ix} and people who are formerly incarcerated and have convictions are subject to nearly 46,000 laws and statutes that impact opportunities for basic employment, housing, education, and other life needs.^x As a result, the vast majority people returning to communities are food insecure.^{xi} Moreover, about half are unemployed a year after their return,^{xii} even as they are more actively looking for work than the general public. Persistent discrimination and barriers undermine opportunity for families and communities of formerly incarcerated people, and if the Administration eliminates access to BCCE, these families will lose the necessary support to cover basic needs.

NAMI strongly opposes the proposed rule that would expose more people to the arbitrary SNAP food cutoff policy. NAMI requests that USDA rescind the proposed rule and instead focus on policies to help decrease food insecurity in vulnerable populations, particularly individuals with mental health conditions. If you have any questions or would like to discuss these comments, please contact Jodi Kwarciany, Manager of Mental Health Policy at jkwarciany@nami.org.

Sincerely,

/s/

Jennifer Snow
Director of Public Policy
NAMI, National Alliance on Mental Illness

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- ⁱ Sita Diehl, Dania Douglas and Ron Honberg, “Road to Recovery: Employment and Mental Illness,” National Alliance on Mental Illness, July 2014, <https://www.nami.org/work>.
- ⁱⁱ Congressional Research Service, “The Supplemental Nutrition Assistance Program (SNAP): Categorical Eligibility,” Updated August 2019, <http://fas.org/sgp/crs/misc/R42054.pdf>.
- ⁱⁱⁱ “Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP): <https://www.federalregister.gov/documents/2019/07/24/2019-15670/revision-of-categorical-eligibility-in-the-supplemental-nutrition-assistance-program-snap>.
- ^{iv} Lola Fadulu, “500,000 Children Could Lose Free Meals Under Trump Administration Proposal,” New York Times, July 30, 2019, <https://www.nytimes.com/2019/07/30/us/politics/free-school-meals-children-trump.html>.
- ^v “Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP): <https://www.federalregister.gov/documents/2019/07/24/2019-15670/revision-of-categorical-eligibility-in-the-supplemental-nutrition-assistance-program-snap>.
- ^{vi} Patience Afulani, Alisha Coleman-Jensen & Dena Herman, “Food Insecurity, Mental Health, and Use of Mental Health Services Among Nonelderly Adults in the United States,” *Journal of Hunger & Environmental Nutrition*, 2015; 105 (10):e48-59: DOI: 10.2105/AJPH.2015.302712.
- ^{vii} Andrew D. Jones, “Food Insecurity and Mental Health Status: A Global Analysis of 149 Countries,” *American Journal of Preventive Medicine*, 2017; 53 (2):264-273: DOI: 10.1016/j.amepre.2017.04.008.
- ^{viii} Elizabeth Poole-Di Salvo, Ellen J. Silver, and Ruth E.K. Stein, “Household Food Insecurity and Mental Health Problems Among Adolescents: What Do Parents Report?,” *Academic Pediatrics*, 2016; 16 (1):90 DOI: 10.1016/j.acap.2015.08.005.
- ^{ix} Kathleen Skowrya & Joseph Cocozza, “Blueprint for Change: A Comprehensive Model for the Identification and Treatment of Youth with Mental Health Needs in Contact with the Juvenile Justice System,” National Center for Mental Health and Juvenile Justice, 2007, https://www.ncmhji.com/wp-content/uploads/2013/07/2007_Blueprint-for-Change-Full-Report.pdf.
- ^x National Inventory of Collateral Consequences of Conviction, <https://niccc.csgjusticecenter.org>.
- ^{xi} Marlysa Gamblin, “Mass Incarceration: A Major Cause of Hunger,” Bread for the World Institute, February 2018, <http://bread.org/sites/default/files/downloads/briefing-paper-mass-incarceration-february-2018.pdf>.
- ^{xii} Lucius Couloute & Daniel Kopf, “Out of Prison & Out of Work: Unemployment Among Formerly Incarcerated People,” Prison Policy Initiative, July 2018, <https://www.prisonpolicy.org/reports/outofwork.html>.