

September 10, 2018

Dear Members of the Farm Bill Conference Committee,

As child advocates in the areas of hunger and nutrition, poverty, health, welfare, housing, and education, we are writing to express our opposition to the Agriculture and Nutrition Act of 2018 (H.R. 2), which will harm the millions of children who rely on federal nutrition programs, including the Supplemental Nutrition Assistance Program (SNAP) for access to consistent, healthy food. **In the interests of our nation's babies, children and youth we strongly urge you to refrain from including any harmful SNAP provisions from H.R. 2 in the final conference agreement and instead urge you to support the Senate bill (S. 3042).**

SNAP is a proven anti-hunger and anti-poverty program for children, which also lowers the odds of household and child food insecurity, and of children's anemia, poor health, hospitalization for failure to thrive, and developmental delays. Research has also found that receiving SNAP in early childhood improved high school graduation rates, adult earnings, and adult health. According to the US Department of Agriculture (USDA)'s most recent data, 19.2 million children participated in SNAP in 2016, representing 44 percent of the program's recipients and receiving 43.7 percent of every SNAP dollar.<sup>1</sup> In addition, school breakfast and lunch programs provided many of these same children a nutritious morning and lunchtime meal each day. Today, as children experience both poverty and food insecurity at higher rates than the general population, federal nutrition programs such as SNAP and school meals are critical supports that help them develop, learn, and succeed. To that end, we urge you to adopt the Senate Farm Bill's nutrition title. Unlike H.R. 2, S. 3042 strengthens the integrity of SNAP while protecting access to **vital nutrition programs for countless children and youth. Specifically, it:**

**Maintains Program integrity without Penalizing Poor and Low-Income Families with Children**

H.R. 2 eliminates Broad Based Categorical Eligibility. Unfortunately, this is a short-sighted policy provision that would significantly narrow SNAP income eligibility to exclude many low-income families with children, and force many states to introduce a counterproductive and costly process of asset testing for SNAP eligibility. S. 3042 recognizes that eliminating Categorical Eligibility is not an effective tool for shoring up program integrity and instead makes improvements in program operations. As a result, it:

- **Protects Low-Income Children from a SNAP “Benefit Cliff”:** The elimination of BBCE under H.R. 2 would reinstate a benefit cliff in a majority of states, jeopardizing food assistance for 400,000 households who are scraping by on earnings just above 130 percent of the Federal poverty line.<sup>2</sup> S. 3042 rejects this counterproductive and harmful provision.
- **Encourages Poor and Low-Income Families with Children to Build Savings:** The loss of categorical eligibility under H.R. 2 means many families would lose eligibility solely because of red tape, and other families may have to choose between meeting their basic need for food and building up the savings and resources that would help them weather emergencies and achieve economic mobility.<sup>3</sup> S. 3042 invests in program integrity without burdening state administrators and needlessly discouraging low-income families from asset building.
- **Maintains Poor and Low-Income Children's Access to School Meals:** Under current law, children who receive SNAP are directly certified for free school meal programs. These meals help combat childhood hunger, while playing an important role in improving academic achievement and test scores and reducing absenteeism, tardiness, and discipline referrals. By forcing families off of SNAP due to changes in categorical eligibility, H.R. 2 would break this vital link between SNAP receipt and school meals for low-income and poor children. As a result,

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<sup>1</sup> U.S. Department of Agriculture, Food and Nutrition Service, Office of Policy Support, Characteristics of Supplemental Nutrition Assistance Program Households: Fiscal Year 2016, by Sarah Lauffer. Project Officer, Jenny Genser. Alexandria, VA, 2017. Table 3.5

<sup>2</sup> The Congressional Budget Office, Cost Estimate for H.R. 2 as ordered by the House Committee on Agriculture on April 18, 2018. Washington, DC, May 2, 2018

<sup>3</sup> The Urban Institute. The Unintended Consequences of SNAP Asset Limits, by Caroline Ratcliffe Signe-Mary McKernan, Laura Wheaton, and Emma Cancian Kalish. Washington, D.C., 2016.

some 265,000 children stand to lose access to free school meals.<sup>4</sup> We urge conferees to adopt the Senate bill, which maintains this critically important connection by protecting categorical eligibility.

- **Preserves SNAP benefits for Poor and Low-Income Children Whose Families Rely on the Low-Income Home Energy Assistance Program (LIHEAP):** LIHEAP is a program that helps low-income households afford their monthly utility bills. Under current law, some states allow households to use LIHEAP benefits greater than \$20/month as proof of significant energy expenses, creating a streamlined method for families to access a modest increase in their SNAP benefit. However, H.R. 2 removes this option for households that do not have an elderly member, effectively requiring poor and low-income families with children to provide substantial documentation of energy bills on a frequent basis for caseworkers to determine their utility allowance, which could discourage them from seeking the larger benefit or decrease its size.

### **Does Not Contain Harsh Work Requirements**

Under current law, existing SNAP work requirements aimed at childless adults already have unintended and harmful consequences for children (for instance, those who rely on pooled resources from extended family and Non-Custodial Parents) and youth (such as those aging out of foster care.) Yet in spite of limited supporting evidence, H.R. 2 intensifies and expands work requirements, reduces state flexibilities for exemptions, and requires states to implement costly training and employment programs that will take funds from food benefits to support a bureaucracy that will not provide quality services to people. Specifically, H.R. 2 would harm:

- **The 13.4 million<sup>5</sup> school-aged children on SNAP:** H.R. 2 takes the unprecedented step of expanding work requirements to adults with school-aged children. This provision risks the wellbeing of children whose parents or guardians are: 1) acting as a caretaker for a loved one such as a child with a disability; 2) have physical or mental health disabilities that don't qualify as a disability under the legal definition; 3) face substantial barriers to work, including substance abuse issues or domestic violence; 4) working but struggling to meet the 20 hour per week threshold or the burdensome documentation requirements; and 5) have difficulty obtaining childcare or transportation. For these parents or guardians, losing SNAP translates to a benefit cut for their whole household, meaning there will be less food on the table for their children. Some parents and guardians may also erroneously believe that their inability to meet these new work requirements makes their children ineligible for SNAP as well, and as a result opt out of applying for or renewing benefits for the entire family.
- **Children in *very vulnerable families* such as:**
  - **Children in the Care of Grandparents:** Today, more than 2.5 million children are being raised by their grandparents or other relatives, in part because families are dealing with parental alcohol and substance abuse issues, which are growing rapidly due to the opioid epidemic. And already, these families face barriers to accessing the full array of benefits and services they need.<sup>6</sup> H.R. 2 would further threaten the ability of grandparents and other older relatives to care for children because it expands work requirements for adults up to age 60 who are caring for children over six years of age. In contrast, S. 3042 makes targeted improvements in SNAP assistance for families impacted by the opioid epidemic by allowing a 3-year certification period for elderly and disabled households.
  - **Children in Families with a History of Family Violence:** H.R. 2 requires parents fleeing family violence with their children to meet the new work requirements unless they receive a state exemption. In addition, H.R. 2 requires parents to cooperate with state Child Support Enforcement (CSE) efforts in order receive SNAP benefits- a drastic change from current law, under which 45

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<sup>4</sup> The Congressional Budget Office, Cost Estimate for H.R. 2 as ordered by the House Committee on Agriculture on April 18, 2018. Washington, DC, May 2, 2018

<sup>5</sup> U.S. Department of Agriculture, Food and Nutrition Service, Office of Policy Support, Characteristics of Supplemental Nutrition Assistance Program Households: Fiscal Year 2016, by Sarah Lauffer. Project Officer, Jenny Genser. Alexandria, VA, 2017. Table 3.5

<sup>6</sup> Generations United. In Loving Arms: The Protective Role of Grandparents and Other Relatives in Raising Children Exposed to Trauma. 2017.

states, DC, and the Virgin Islands have declined to link the two. Yet H.R. 2 effectively eliminates existing state flexibility around CSE cooperation, meaning parents who would like to apply for SNAP but are afraid of CSE requirements which would link them to their abusers are forced to choose between safety and feeding their children.

- **Children in Military and Veteran Families:** Many veteran and military families need help feeding themselves and their children. Today, households that include a veteran with a disability are nearly twice as likely to lack access to adequate food as households that do not include someone with a disability, and sadly, food insecurity rates are nearly double among post-9/11 veterans. Furthermore, currently-serving military families often experience food insecurity because of financial emergencies, low pay, and crisis levels of chronic unemployment or underemployment of military spouses in a society where most families need dual incomes to live. By subjecting these parents, including those suffering from PTSD, to the new work requirements, H.R. 2 would penalize families in need who have already sacrificed so much for our nation.
- **Youth aging out of foster care and unaccompanied, homeless youth:** Youth aging out of foster care often face various challenges, including homelessness, difficulty affording education, and finding employment. Unaccompanied homeless youth and young adults (who lack safe stable housing and who are not in the care of a parent or guardian) experience similar difficulties, especially when they reach age 18. Existing SNAP work requirements already create a substantial barrier for these young people from accessing food assistance, because they technically meet the definition of a childless adult. Under the harsh requirements in H.R. 2, these vulnerable young adults will face even larger obstacles to food assistance.

The Farm Bill represents an important opportunity for policy solutions that will strengthen and improve nutrition programs for our nation's children and youth. H.R. 2, however, is slated to reduce spending on SNAP benefits by more than \$20 billion over 10 years, and will disproportionately hurt them through its harmful provisions. S. 3042, on the other hand, protects children and youth whose families rely on SNAP to put food on the table. We urge you to protect them and, for the reasons listed above, adopt the SNAP provisions of S. 3042 and reject the harmful SNAP provisions in H.R. 2 in any final farm bill conference agreement.

Thank you for your time and attention. If you have any questions, please contact Rachel Merker with First Focus Campaign for Children at [RachelM@firstfocus.org](mailto:RachelM@firstfocus.org) or Randi Schmidt with the Children's Leadership Council at [RSchmidt@childrensleadershipcouncil.org](mailto:RSchmidt@childrensleadershipcouncil.org).

Signed,

1,000 Days  
African American Health Alliance  
American Academy of Pediatrics  
American Federation of State, County and Municipal Employees (AFSCME)  
BUILD Initiative  
Center for Law and Social Policy (CLASP)  
Child Care Aware of America  
Child Labor Coalition  
Child Welfare League of America  
Children's Advocacy Institute  
Children's Aid  
Children's Defense Fund  
Children's Health Fund  
Children's Leadership Council  
Children Now  
Citizens' Committee for Children of New York

Coalition on Human Needs  
Covenant House International  
Criminalization of Poverty Project at Institute for Policy Studies  
Delta Community Supports  
Every Child Matters  
Families USA  
First Five Years Fund  
First Focus Campaign for Children  
Food Research & Action Center (FRAC)  
Generations United  
Healthy Teen Network  
Heartland Family Service  
Justice Resource Institute  
Jumpstart  
Lutheran Services in America  
Meritan  
MomsRising  
National Alliance of Children's Trust and Prevention Funds  
National Association for Family Child Care  
National Center on Adoption and Permanency  
National Council of Jewish Women  
National Foster Family-based Treatment Association  
National Human Services Assembly  
National Indian Child Welfare Association  
National Indian Education Association  
National Indian Health Board  
National Migrant Seasonal Head Start Association  
National Organization for Women  
National PTA  
National Urban League  
National WIC Association  
National Women's Law Center  
National Youth Advocate Program, Inc.  
Omni Visions  
Oral Health America  
Parents as Teachers  
Partnership for America's Children  
Prosperity Now  
Public Advocacy for Kids  
Racial and Ethnic Health Disparities Coalition  
Sargent Shriver National Center on Poverty Law  
Share Our Strength - No Kid Hungry  
SparkAction  
StandUp for Kids  
The Phoenix Institute  
Western Regional Advocacy Project  
Youth Villages  
YWCA USA  
ZERO TO THREE