

OFFICERS

Hon. Karen Bass

Chair

Hon. Joyce Beatty

First Vice Chair

Hon. Brenda Lawrence

Second Vice Chair

Hon. Hank Johnson

Secretary

Hon. A. Donald McEachin

Whip

Hon. Steven Horsford

Parliamentarian

Hon. Frederica Wilson

Member-At-Large

Hon. Dwight Evans

Member-At-Large

MEMBERS

Hon. John Lewis, GA - '87

Hon. Eleanor Holmes Norton, DC - '91

Hon. Maxine Waters, CA - '91

Hon. Sanford D. Bishop, Jr., GA - '93

Hon. James E. Clyburn, SC - '93

Hon. Alcee L. Hastings, FL - '93

Hon. Eddie Bernice Johnson, TX - '93

Hon. Bobby L. Rush, IL - '93

Hon. Robert C. "Bobby" Scott, VA - '93

Hon. Bennie G. Thompson, MS - '93

Hon. Sheila Jackson Lee, TX - '95

Hon. Elijah Cummings, MD - '96

Hon. Danny K. Davis, IL - '97

Hon. Gregory W. Meeks, NY - '98

Hon. Barbara Lee, CA - '98

Hon. William Lacy Clay, Jr., MO - '01

Hon. David Scott, GA - '03

Hon. G.K. Butterfield, NC - '04

Hon. Emanuel Cleaver II, MO - '05

Hon. Al Green, TX - '05

Hon. Gwen Moore, WI - '05

Hon. Yvette D. Clarke, NY - '07

Hon. Hank Johnson, GA - '07

Hon. André Carson, IN - '08

Hon. Marcia L. Fudge, OH - '08

Hon. Karen Bass, CA - '11

Hon. Cedric Richmond, LA - '11

Hon. Terri Sewell, AL - '11

Hon. Frederica Wilson, FL - '11

Hon. Donald M. Payne, Jr., NJ - '12

Hon. Joyce Beatty, OH - '13

Hon. Hakeem Jeffries, NY - '13

Hon. Marc Veasey, TX - '13

Hon. Robin Kelly, IL - '13

Hon. Cory Booker, NJ - '13

Hon. Alma Adams, NC - '14

Hon. Brenda Lawrence, MI - '15

Hon. Stacey Plaskett, VI - '15

Hon. Bonnie Watson Coleman, NJ - '15

Hon. Dwight Evans, PA - '16

Hon. Kamala D. Harris, CA - '17

Hon. Lisa Blunt Rochester, DE - '17

Hon. Anthony Brown, MD - '17

Hon. Val Demings, FL - '17

Hon. Al Lawson, FL - '17

Hon. A. Donald McEachin, VA - '17

Hon. Steven Horsford, NV - '19

Hon. Colin Allred, TX - '19

Hon. Antonio Delgado, NY - '19

Hon. Jahana Hayes, CT - '19

Hon. Lucy McBath, GA - '19

Hon. Joe Neguse, CO - '19

Hon. Ilhan Omar, MN - '19

Hon. Ayanna Pressley, MA - '19

Hon. Lauren Underwood, IL - '19



CONGRESSIONAL BLACK CAUCUS

November 18, 2019

Sonny Perdue
Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Ave., SW
Washington, DC 20250

Dear Secretary Perdue:

On behalf of the Congressional Black Caucus, we write to further express concerns with the U.S. Department of Agriculture's (USDA) proposed rule to eliminate broad-based categorical eligibility (BBCE) in the Supplemental Nutrition Assistance Program (SNAP). Given the Department's October release of data showing nearly 1 million school-age children would lose automatic eligibility for free school meals, we strongly urge you to immediately withdraw the proposal.

On October 2, 2019, we, along with our colleagues, sent a letter to USDA vehemently opposing the proposed rule due to its adverse impact on millions of people who rely on SNAP to put food on the table. By USDA's own estimates, over 3 million people, including seniors, veterans, persons with disabilities and working families with children, would be kicked off SNAP.

Since the proposed rule's Regulatory Impact Analysis omitted data showing the projected impact on school meal eligibility, the letter cited USDA's verbal confirmation that the proposal would cause approximately 500,000 schoolchildren to lose automatic access to free school meals. However, in light of USDA's release of data on October 18, 2019, showing the negative impact on classroom hunger to be nearly double the Department's initial estimates, we remain deeply troubled that you have not yet reconsidered this harmful proposal.

Federal law streamlines access to free school meals for children living in SNAP households. According to USDA's Food and Nutrition Service, of the nearly 30 million children who participated in the National School Lunch Program on an average day in school year 2018-2019, participation was highest among children who qualify for free meals.¹ School lunch is critical to student health and well-being, especially for

¹ Financial Management Budget Division. 2019. *Program Information Report (U.S. Summary, FY 2018 – FY 2019)*. USDA Food and Nutrition Service. <https://fns-prod.azureedge.net/sites/default/files/data-files/Keydata-August-2019.pdf>

low-income students, and ensure students have access to the nutrition they need throughout the day to learn and stay focused in the classroom.²

However, according to the Urban Institute, USDA's initial analysis of the effect of restricting BBCE only accounts for the loss of free and reduced-price meals for those students who would lose their SNAP benefits.³ Still unknown is the extent to which your proposed rule would impact schools serving free meals through the Community Eligibility Provision (CEP), a key provision of the Healthy Hunger Free Kids Act of 2010. CEP allows the nation's poorest schools to level the playing field by offering universal-free breakfast and lunch to all enrolled students, while reducing the paperwork burden associated with processing school meal applications. Currently, approximately 13.6 million children attend schools serving nutritious meals at no cost to students through CEP.⁴

Schools where at least 40 percent of students are automatically certified for free school meals, based on their participation in certain federal assistance programs, are eligible to adopt CEP to provide free meals to all students without their families having to fill out and submit an application. According to research conducted by the Food Research and Action Center, of the nearly 29,000 schools participating in CEP, 22 percent are very close to the cutoff threshold, with 40% to 49% of students residing in households receiving public assistance, such as SNAP.⁵

SNAP is the first line of defense against hunger and food insecurity for low-income families and children. Today, 20 million children rely on SNAP as the program helps them reach their full potential by:

- Helping to end child hunger and improving child food insecurity rates;⁶
- Promoting stronger learning and academic performance;⁷ and
- Reducing the likelihood of chronic conditions such as obesity, diabetes, and the risk of anemia, resulting in fewer doctor visits and hospitalizations.⁸

USDA should not punish poor people simply because they are poor. Children need access to nutritious foods both at home and during the school day. Your proposed rule would ultimately weaken the ability of SNAP and the federal school meals programs to effectively combat household and classroom hunger across the country.

Again, we ask you to immediately withdraw this cruel proposal.

Sincerely,



Karen Bass
CBC, Chair Congressional Black Caucus



Marcia L. Fudge
Subcommittee on Nutrition, Oversight and Department Operations,
Chair

² Food Research and Action Center. 2019. *Benefits of School Lunch*. <https://frac.org/programs/national-school-lunch-program/benefits-school-lunch>

³ Blagg, Rainer and Waxman. 2019. *How Restricting Categorical Eligibility for SNAP Affects Access to Free School Meals*. https://www.urban.org/sites/default/files/publication/101280/how_restricting_categorical_eligibility_for_snap_affects_access_to_free_school_meals_0.pdf

⁴ Maurice, Rosso, Fitzsimons and Furtado. 2019. *Community Eligibility: The Key to Hunger-Free Schools, School Year 2018-2019*. Food Research and Action Center. <https://frac.org/wp-content/uploads/community-eligibility-key-to-hunger-free-schools-sy-2018-2019.pdf>

⁵ Maurice, pg. 10.

⁶ Ratcliffe, Caroline and Signe-Mary McKernan. 2010. *How Much Does SNAP Reduce Food Insecurity?* Urban Institute. <https://www.ers.usda.gov/webdocs/publications/84336/ccr-60.pdf?v=0>

⁷ Carlson, Steven et al. 2016. *SNAP Works for America's Children*. Center on Budget and Policy Priorities. <https://www.cbpp.org/research/food-assistance/snap-works-for-americas-children>

⁸ Hoynes, Hilary et al. 2016. *Long-Run Impacts of Childhood Access to Safety Net*. American Economic Review, 106(4). <https://gspp.berkeley.edu/assets/uploads/research/pdf/Hoynes-Schanzenbach-Almond-AER-2016.pdf>