



Association of Arizona Food Banks

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Position Statement:

Proposed Rulemaking on SNAP Eligibility
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Proposed SNAP Eligibility Change Will Increase Hunger in Arizona

On July 24, 2019, the US Department of Agriculture published a proposal to change eligibility criteria for the Supplemental Nutrition Assistance Program (SNAP, formerly “food stamps”) that would effectively eliminate food assistance for an estimated 40,000 Arizonans, including more than **12,000 working families (roughly 32,000 individuals, more than 50 percent of them children)** and **nearly 7,000 seniors and people with disabilities in Arizona**.¹ The Association of Arizona Food Banks (AAFB) strongly opposes the proposed rule, which would increase food insecurity for Arizonans struggling with hunger, impact grocers and overwhelm local food banks with increased demand.

About AAFB

In Arizona, nearly 1 in 6 individuals and more than 1 in 4 children struggle with food insecurity.² AAFB and its members served an average of 450,000 Arizonans in need each month in 2018, including children and seniors. Last year, we distributed more than 175 million pounds of food statewide, or roughly 145 million meals.³ For every meal our emergency food network provides, however, SNAP can provide up to 12.⁴ In 2018, SNAP helped an average of 850,000 Arizonans access food each month, and 50 percent of them were children.⁵ This partnership is critical to making sure Arizonans have access to healthy foods that allow them to work and play.

Current Eligibility Criteria & Proposed Changes

Currently, states have the option to provide SNAP to households that receive benefits under the Temporary Assistance for Needy Families (TANF) program under the “broad-based categorical eligibility” provision (or, BBCE). Along with more than 40 other states, Arizona has chosen to implement this option for the past two decades, thereby allowing additional working families, seniors, and people with disabilities to qualify for SNAP. In Arizona, this means that households qualify for SNAP at 185 percent of the federal poverty line—which is roughly \$39,000/year for a family of three—instead of 130 percent of the federal poverty line—roughly \$27,000/year for a family of three. Benefits slowly taper off as the household income improves, thereby rewarding work without a

¹ State of Arizona, Department of Economic Security (DES), Public Records Request, 26 July 2019.

² Feeding America, [Map the Meal Gap 2018: A Report on County and Congressional District Food Insecurity and County Food Cost in the United States in 2016](#). Published May 2018.

³ AAFB’s calculations based on data collection from five member food banks: Community Food Bank of Southern Arizona, HonorHealth Desert Mission Food Bank, St. Mary’s Food Bank Alliance, United Food Bank, and Yuma Community Food Bank.

⁴ Feeding America. [Feeding America Opposes Harmful SNAP Proposed Rule Released by USDA](#). 1 February 2019.

⁵ DES, [Arizona Legislative Districts: DES Client/Provider and Community Demographics Summary Handbook 2018](#). January 2019.

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harsh cutoff. Low-income families often struggle to make ends meet because housing and childcare expenses take up a large share of their income. BBCE also allows states to impose less restrictive asset tests for SNAP participants; by eliminating the asset limit in Arizona, families, seniors, and people with a disability can accumulate modest savings for use in emergencies while continuing to afford groceries.⁶

In the proposed rule published on July 24, the USDA aims to restrict SNAP access through BBCE to include only those households receiving TANF benefits that are (a) ongoing and substantial cash assistance⁷ or (b) non-cash benefits that focus on employment and childcare.⁸

AAFB Position Statement

The Association of Arizona Food Banks (AAFB) opposes the changes proposed by the USDA in the federal register on July 24, 2019 ([Revision of Categorical Eligibility in SNAP Regulatory Impact Analysis](#)) because they will eliminate access to critical food assistance for up to 40,000 Arizonans. SNAP is a lifeline for working families, seniors, people with disabilities, and other individuals struggling to make ends meet.

By its own estimates, the USDA states that its proposed changes could result in increased food insecurity, especially for seniors; we find this unacceptable. SNAP participation among eligible seniors is already low in Arizona; we should be providing more nutritional support to older adults- who often suffer from dietary diseases like diabetes and hypertension- not less.

The proposed SNAP eligibility changes would also take free school meals away from thousands of children across Arizona whose enrollment is linked to their families' SNAP participation. Increasing access to school meals has been proven to reduce childhood food insecurity and improve children's health and academic performance.⁹ Instead, this proposal goes in the opposite direction by restricting children's access to nutritious school meals and jeopardizing health outcomes.

Resources: To read the proposed rules, visit [FNS-2018-0037, RIN 0584-AE62](#). To submit a comment by the deadline of 11:59pm (Eastern Time) on September 23, 2019, click [SUBMIT A FORMAL COMMENT](#). AAFB will be submitting formal comments and sharing templates for Arizona-focused comments with our network and partners, so please stay tuned.

Questions? Please contact Ashley St. Thomas at ashley@azfoodbanks.org or 602-775-5035.

⁶ All households receiving SNAP benefits, including those eligible through BBCE, are vetted prior to approval. Each household must apply for SNAP, be interviewed, and document monthly income and expenses.

⁷ The USDA defines "ongoing and substantial" to mean receiving at least \$50/month in TANF cash assistance for at least six months.

⁸ Non-cash benefits that focus on employment or childcare are defined as: (1) subsidized employment for which the employer or a third party receives a subsidy to offset some or all of the wages and costs of employing an individual; (2) work supports, including transportation benefits or vouchers to assist families to participate in employment or work activities; and (3) childcare subsidies or vouchers to support working families.

⁹ USDA, Economic Research Service. [Children's Food Security and Child Nutrition Programs](#). June 2017.

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