



August 5, 2019

Mr. Sonny Perdue  
Secretary of Agriculture  
Program Development Division, Food and Nutrition Service  
United States Department of Agriculture  
3101 Park Center Dr.  
Alexandria, VA 22302

Re: Docket ID No. FNS-2018-0037, "Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program"

Dear Mr. Perdue,

I am writing on behalf of **Wildfire**: Igniting Community Action to End Poverty in Arizona. This letter is in regard to the United States Department of Agriculture's (USDA) request for comments on "Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program," published to the federal register on July 24, 2019.

Wildfire is a statewide anti-poverty organization and serves as Arizona's Community Action association. For over half a century, Wildfire has worked to alleviate the impact of poverty in Arizona. We advocate for fair practices, collaborate on policy issues, and support Community Action and other human service programs and agencies. Beyond easing the effects of poverty, we hope to ignite lasting change – to "stop poverty before it starts."

Wildfire also serves as Arizona's Supplemental Nutrition Assistance Program (SNAP) community outreach grantee. As such, we provide support and training and technical assistance to organizations throughout the state that are working to improve health and economic outcomes for low-income Arizonans. We are committed to creating an Arizona where all may thrive and recognize that SNAP is a critical supportive service that helps families and individuals access healthy food in hard times. The proposed rule would eliminate broad-based categorical eligibility (BBCE), forcing approximately 30,000 Arizonans to go without critical nutrition assistance.

Based on the department of Housing and Urban Development's 2018 Fair Market rent values, a family living in Maricopa County (Arizona's most populous locality) would have to work full-time and earn \$15.67 per hour to afford a one-bedroom apartment. Our state's minimum wage is currently set at \$11 per hour, presenting a differential of \$4.67 per hour that families must accrue to keep a roof over their children's heads. In other regions, such as Coconino County, the cost is even higher. A resident of this county would need to earn \$17.69 per hour to afford a one-bedroom apartment – a full \$6.69 more than the state's minimum wage.

This difference between the state's minimum wage and a livable wage forces families to make difficult decisions between paying for healthcare, medication, food, clothing, and shelter. A SNAP benefit card provides these families with some reprieve and the ability to purchase food.



Broad-based community eligibility is important to Arizona residents. It allows those with slightly higher incomes – up to 185% of the Federal Poverty Level (FPL) to qualify for SNAP if they meet certain other criteria. Working families, people with disabilities, and older adults living on a fixed income would lose their access to SNAP benefits. Wildfire believes this would have a devastating impact on community health and overall economic wellbeing, as these individuals would lose access to healthy food or be forced to choose between safe housing, medication, and other necessities.

This rule change would have a ripple effect on schoolchildren as well. Current school nutrition guidelines provide for community eligibility based on the rate of SNAP participation in schools or districts. As a result, children from low-income families who might not be receiving SNAP may qualify for free or reduced lunch at school based on the percentage of students receiving SNAP in their community. Removing BBCE would have the unintended consequence of preventing children in low-income schools or districts from receiving healthy meals at school.

Wildfire believes that SNAP is an essential supportive service, and that BBCE is a vital provision for low-income Arizona families. For the health and wellbeing of Arizona families, we ask that the USDA continue the BBCE provision and take no action to eliminate this essential support for our families.

Sincerely,

Cynthia Zwick  
Executive Director