

PATRICK H. WEST
City Manager

September 6, 2019

Ms. Mary Rose Conroy
Program Design Branch, Program Development Division, FNS
U.S. Department of Agriculture
3101 Park Center Drive, Room 800
Alexandria, Virginia 22302

Re: Opposition to Major Changes in the Supplemental Nutrition Assistance Program

Dear Ms. Conroy:

On behalf of the City of Long Beach (City), I want to thank you for allowing us to submit comments regarding Major Changes in the Supplemental Nutrition Assistance Program (SNAP) proposed by the Food and Nutrition Service Agency, U.S. Department of Agriculture (USDA), Docket Number: FNS-2019-0030.

We understand the USDA is proposing to amend federal regulations governing the way in which states can authorize automatic eligibility for SNAP upon receiving Temporary Assistance for Needy Families (TANF), CalWORKs in California, benefits under Section 5(a) of the Food and Nutrition Act of 2008. Specifically, the USDA proposes: (1) to define “benefits” for categorical eligibility to mean ongoing and substantial benefits; and (2) to limit the types of non-cash TANF benefits conferring categorical eligibility to those that focus on subsidized employment, work supports and childcare. We object to these changes, as they would result in denied access to safety net programs for strictly very low-income individuals and families earning a gross income cap of 130 percent of the federal poverty line (FPL).

Current law allows states to adjust SNAP eligibility to serve families and seniors with incomes modestly above 130 percent of the FPL, provided their net income after basic needs like shelter and childcare is under 100 percent FPL. This broad-based categorical eligibility is vital for people with higher costs of living or modest savings, including low-wage working families, older adults, and people with disabilities, to qualify for benefits to help put food on the table. Particularly in California, where the cost of living is significantly higher than the FPL, the proposed Major Changes in the SNAP, CalFresh in California, would exacerbate food insecurity for low-income individuals and significantly increase states’ administrative costs and burdens.



Incorporated in 1888, Long Beach, California is a city with an estimated population of 467,354, as reported by the United States Census. We are committed to promoting access to services, especially those that improve community wellness. According to estimates from the May 2019 Local Agency participation report, 62,188 out of 100,303 Long Beach residents eligible for CalFresh are enrolled in the program. This does not include the estimated 39,946 residents, including older adults and people with disabilities, who may be eligible for CalFresh as of June 1, 2019 due to the historic State expansion for Supplemental Security Income recipients. We support policies and legislation for nutrition programs including SNAP that provides food security and improved nutrition for families and individuals of all ages.

Given these reasons, the City of Long Beach respectfully objects to the current language of the SNAP regulations and requests that all people living in the United States earning within 200 percent of the federal poverty line receive justice when it comes to accessing public benefits.

Sincerely,



PATRICK H. WEST
City Manager

cc: The Honorable Senator Dianne Feinstein
The Honorable Senator Kamala Harris
The Honorable Congressman Alan Lowenthal, 47th District
The Honorable Congressman Nanette Barragan, 44th District

