

Congress of the United States
Washington, DC 20515

November 15, 2019

The Honorable Sonny Perdue
Secretary
U.S. Department of Agriculture
1400 Independence Avenue, N.W.
Washington, D.C. 20250

Dear Secretary Perdue:

On behalf of the millions of Massachusetts residents that we represent, we write in strong opposition to the Administration's most recent proposed rule to restrict how states determine utility expenses in calculating benefits for needy households under the Supplemental Nutrition Assistance Program (SNAP). This proposed regulation will strip states of their needed flexibility to set the Standard Utility Allowances (SUAs) using state-based, current energy cost information. This proposed rule is the third regulation proposed by the Trump Administration that will both limit state flexibility and cut core nutrition benefits for American citizens. The most recent proposed change will inflict an unsupported, "cookie cutter" approach that will limit how states calculate and document basic energy and utility costs for SNAP households. The Administration's own analysis states that the net impact of this proposed change will cut \$4.5 billion in nutrition dollars over the five-year period of 2021-2025.

The Trump Administration's proposed rule will **increase hunger and hardship for an estimated 200,000 Massachusetts residents**,¹ a state in which 1 in 9 residents receive assistance from SNAP. Under the most recent proposed rule, Massachusetts will lose nearly 9 percent of its SNAP benefits annually, which translates into **over \$100 million annual nutrition dollars**.² More than 56 percent of Massachusetts SNAP households are families with children and nearly 49 percent of SNAP households have an elderly or disabled household member.³ The Administration's proposed rule on SUAs will have a **disproportionately adverse effect on SNAP households that include an elder or disabled member as well as working families with children**, triggering an average SNAP cut of nearly \$45 per month.⁴ These are households that struggle not only with high cost-of-living and utility costs, but also expensive food costs and unreimbursed medical expenses while they struggle to remain in their homes and communities.

SNAP is part of this country's hunger-relief safety net, and individuals and families need these programs to keep food on the table. SNAP is a program that was designed to supplement income, and the SNAP financial calculation was designed to consider basic living expenses including monthly housing costs and utility costs to ensure that participants have sufficient access to benefits year-round. We are worried that the Administration's recent proposal will artificially lower the amount of utility-related costs that SNAP households may claim. We seek to learn how USDA believes the recently

¹ USDA Regulatory Impact Analysis, Table E (pg 43) State Level Impacts of Proposed Rule. 45.18% of MA SNAP households impacted.

² Ibid. Table E. Net impact on benefits in MA, - 8.78%. This equals \$98M annual SNAP benefits.

³ Center on Budget and Policy Priorities, State Data Fact Sheets SNAP:

https://www.cbpp.org/sites/default/files/atoms/files/snap_factsheet_massachusetts.pdf

⁴ Center for Budget and Policy Priorities analysis of impact on SNAP households in impacted states.

proposed rule, if implemented, will impact states like Massachusetts, where there is a higher cost of living compared to other parts of the country.

Massachusetts is currently ranked as one of the most expensive states in the nation to live in, based on the cost of housing, energy, child care, transportation, health care and food.⁵ Massachusetts energy costs alone are among the highest in the nation; second only to Hawaii in the cost of natural gas,⁶ and third to Hawaii and Rhode Island in the cost of electric.⁷ Further, the New England Region has some of the highest heating oil and propane prices in the nation. These costs barely scratch the surface of the additional utility expenses incurred by families, including but not limited to: cooking fuel, electricity for lights and appliances, trash collection fees, phone and internet – all of which make up the very utility allowance the Administration is now proposing to substantially reduce.

Food insecurity is associated with some of the country's most common and costly health problems. Increased obstacles to hunger-relief programs will worsen public health outcomes and roll back significant progress in the fight against hunger and poverty in America. Nationally, researchers have estimated that the health-related costs of food insecurity total to \$160 billion each year—in Massachusetts alone, that amounts to \$2.4 billion annually. There is a clear case for hunger-relief from both an economic and public health perspective, and Congress has shown ongoing support for such programs—including in the 2018 bi-partisan Farm Bill.

As members of the Massachusetts Congressional Delegation, we will do all that we can to protect our most financially vulnerable constituents. SNAP is our country's the first line of defense against hunger. Limiting the ability of states to use a flexible methodology to calculate and claim utility expenses will increase hardship for low-income households.

We strong urge the USDA to reconsider the damaging nature of these policies, and to retain state flexibility to determine an allowable utility deduction.

Sincerely,



Elizabeth Warren
United States Senator



James P. McGovern
Member of Congress



Edward J. Markey
United States Senator



Richard E. Neal
Member of Congress

⁵ Missouri Economic Research and Information Center. Massachusetts ranked 46th most expensive state in 2019, cited in World Population Review, 2019 <http://worldpopulationreview.com/states/states-with-lowest-cost-of-living/>

⁶ US Energy Information Administration, Natural Gas Data <https://www.eia.gov/naturalgas/>

⁷ U.S. Energy Information Administration, Electric Power Monthly by state 2019 https://www.eia.gov/electricity/monthly/epm_table_grapher.php?t=epmt_5_6_a See also How Much: Understanding Money, 5/7/2019 <https://howmuch.net/articles/how-much-americans-pay-in-electricity-rates-in-each-state-2019>



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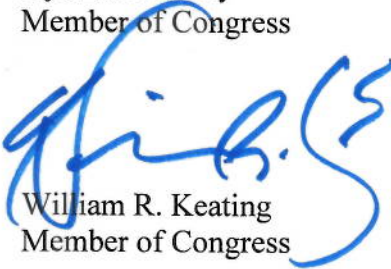
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