

**The comment period for this rule closed on December 2, 2019. Thank you for all your efforts on submitting comments in opposition to this harmful rule. We will keep you posted as soon as more information comes available regarding this rule.**

**On December 5, 2019, USDA published a Final Rule relating to ABAWD work reporting requirements and time limits. Please visit [this campaign page](#) to learn more and take action.**

- <http://bit.ly/SNAPRuleCampaign>

**On October 3, 2019, the Trump Administration [proposed a rule](#) that would make families choose between putting food on the table and paying their utilities. If you are ready to take action and support our work, this site provides background information, campaign details and instructions on how to submit comments. Comments are due on or before December 2, 2019.**

**On this page, you will find:**

- [Background](#) on the rule
- [Tools](#) to activate and submit comments from organizations and individuals
- [Social media](#) tools
- [Resources](#) with additional context

Note: short URL for this campaign page is <http://bit.ly/SNAPRuleCampaign3>

## **Background**

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### **Yet Another Trump Administration Proposal to Cut SNAP Benefits**

On October 3, 2019, USDA published yet another proposed rule that would cut SNAP benefits, this time a total of \$4.5 billion over five years. The cut would result from changes in how states take households' utility costs into account in determining the amount of SNAP benefits for which they qualify.

Policymakers recognize that household resources needed to pay for basics such as shelter, utility costs and childcare are not available to purchase food. Under current law, SNAP takes into account the utility expenses of each SNAP household. States

adjust household benefits based on a state-specific Standard Utility Allowance (SUA) calculated by the state and approved by USDA. The current policy allows variances in SUAs to accommodate for differences in utility costs and rates, and allows states flexibility in how they calculate those costs.

The proposed rule <https://www.regulations.gov/document?D=FNS-2019-0009-0001> would standardize and cap SUA calculations across the country based on survey data. The Administration concedes that the proposed rule would cause 19 percent of SNAP households to get lower SNAP monthly benefits, would disproportionately impact elderly people and people with disabilities, and would cause a national net cut to SNAP benefits amounting to \$4.5 billion over five years.

This USDA rulemaking is yet another attempt for the Administration to side step Congress and make cuts to SNAP benefits. Congress reviewed SNAP policy during the 2018 Farm Bill, including the fact that states have options under that may produce differences in SNAP eligibility benefit amounts from state to state. Although the [President's FY 2020 Budget](#) included a request for a change similar to the proposed rule, Congress did not include such a change in the 2018 Farm Bill.

### **We Need Your Help Once Again!**

Feeding America, FRAC, Center on Budget and Policy Priorities, and Center for American Progress are again coordinating a joint comment campaign on this latest attempt to cut SNAP benefits. The 60-day comment period ends on December 2.

We appreciate all the efforts your groups have been making to protect and strengthen SNAP, including by engaging in administrative advocacy on prior rulemakings.

Please let us know your questions and feedback via email [rcampbell@feedingamerica.org](mailto:rcampbell@feedingamerica.org), [csloane@americanprogress.org](mailto:csloane@americanprogress.org) and [evollinger@frac.org](mailto:evollinger@frac.org)

**[Comments must be received by USDA on or before December 2, 2019](#)**

### **Take action - Tools to Submit Comments:**

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#### **1. ORGANIZATIONS: Submit comments from your organization.**

We've developed templates for organizations that can be easily customized. A basic template model comments is [here](#). In GoogleDocs, click the "File" dropdown to either "download" or "make a copy" of the template so you can tailor your comments.

You can upload or cut and paste your comments into the online submission tool [here](#). Or, if you prefer, you can mail comments to: Program Design Branch, Program Development Division, FNS, 3101 Park Center Drive, Alexandria, Virginia 22302.

### Model Comments

- [General Template](#)
- [Health Template](#)
- [Education Template](#)
- [Economic Impact Template](#)
- [Kids Template](#)
- [Disability Community Template](#)
- [LGBTQ Sign-on Letter](#)
- [Women's Template](#)
- [Tribe or Tribal-Serving Organization Template](#)
- [Faith Community Template](#)
- [Communities of Color Template](#)
- [College Student Template](#)

## **2. INDIVIDUALS: Ask your grassroots networks to generate comments.**

In addition to the organizational comments, it is vital that we generate a significant volume of comments in opposition to the rule. Ask your networks, your grassroots advocates, volunteers, staff, and others (get creative!) to submit individual comments in opposition to the rule. We are developing digital comment platforms to make this process as easy as possible. Feel free to use any of the options below that work best for your organization or leverage your own platform to further tailor to your audience.

- Feeding America: <http://bit.ly/FASNAPcomment>
- The Center for American Progress: <https://handsoffsnap.org/>
- Food Research & Action Center (FRAC): <https://frac.salsalabs.org/snap-sua/index.html>

## **Social Media Resources**

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Continue encouraging your followers and supporters to submit public comments in opposition to this truly shameful proposed rule with the [digital toolkit](#).

**Hashtags:** #HandsOffSNAP, #ProtectSNAP

- **Next tweetstorm:** Monday, December 2, 2 - 4 p.m. ET *\*\*please note extended time!\*\**
- **[Click here for the SNAP 3.0 SUA Digital Toolkit](#)** (you'll find save-the-date graphics, sample tweets, and a sample outreach email – much more content to come)

- Please reach out to Christine Sloane ([csloane@americanprogress.org](mailto:csloane@americanprogress.org)) if your organization would like to contribute sample and shareable content and/or be part of the strategy and content development.

## Resources

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### USDA Resources:

- [Regulatory Impact Analysis](#) (last two pages includes USDA estimates of state level impacts)
- [Press Release](#)
- [Factsheet](#)

### Background Resources:

- [SNAP SUA Rulemaking National Organization Webinar 10.15.19 Slides](#)
- [FRAC Chat on SUA Rule](#)
- [USDA 1979 Guidance on SUA Methodologies](#) (no longer posted on website, but still the only guidance they've ever issued, to our knowledge. May be useful as background for detailed comments.)
- [Urban Institute: Estimated Effect of Recent Proposed Changes to SNAP Regulation](#)
- [Colder States Would Lose More SNAP Benefits under Proposed Changes | Urban Institute](#)

### Statements in Opposition to the Proposed Rule:

- [CAP](#)
- [Feeding America](#)
- [Western Center on Law and Poverty](#)

### In the News

- [VT Op-ed](#)
- [Recent efforts to build momentum against the proposed rule include a letter from the Massachusetts congressional delegation](#)
- [SNAP Challenges during National Hunger and Homelessness Week](#)
- [Thanksgiving themed op ed](#)
- [Maryland Delegation Letter SNAP SUA](#)

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