



SPOKANE CITY COUNCIL
808 W. Spokane Falls Blvd.
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(509) 625-6255

Ben Stuckart
Council President

September 6, 2019

Ms. Jessica Shahin
Associate Administrator, Supplemental Nutritional Assistance Program
Program Design Branch, Program Development Division
Food and Nutrition Service, USDA
3101 Park Center Dr.
Alexandra, VA 22302

Dear Associate Administrator Shahin:

As City Council President of Spokane, Washington I am writing to strongly express my opposition to the proposed revision of “broad based categorical eligibility” in USDA’s Supplemental Nutrition Assistance Program (SNAP) published in the Federal Registry on July 23, 2019. Changing eligibility requirements for SNAP will reduce the food security for a large number of the residents of Spokane, will weaken many of Spokane’s households’ ability to build economic self-sufficiency and will cause severe negative economic impacts to our local businesses.

I am especially concerned how these proposed changes will harm the health of our children in Spokane. **According to the Washington State Department of Social and Health Services, 12,290 City of Spokane residents may lose access to SNAP, including 1,281 children under age 5 and 3,058 school-age children**ⁱ. Children who lose SNAP benefits may also lose access to free and reduced lunch programs at school. Frankly, any proposed change that could result in over 4,000 children losing access to food (both through SNAP and free and reduced lunch programs) is immoral and shameful. Reducing access to healthy food to such a large number of individuals in one city contradicts the stated mission of the USDA Food and Nutrition Service “...to increase food security and reduce hunger by providing children and low-income people access to food, a healthful diet...”

The SNAP program supports individuals and households with food security while still being able build assets and savings that allow them to get to self-sufficiency. Washington allows some SNAP recipients that meet income guidelines to acquire assets like vehicles to increase employability or build savings to stabilize their household during a decrease in income or unforeseen family emergency. Why would government punish citizens striving towards self-sufficiency and personal responsibility? Research in one study shows that by limiting the asset requirement, liquid savings increased by 22.8% and the probably of owning a car by 3%ⁱⁱ. The program is working.

The USDA’s website touts “cascading” economic benefits of SNAP benefits in communities – communities like Spokane. The changes proposed will have a negative



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impact on our local economy. Households receiving SNAP benefits spend on average \$28.80 per receipt on food and durable goodsⁱⁱⁱ. Much of this spending occurs in local stores and small businesses that employ hundreds of local workers. In many high-poverty areas, SNAP purchases can “can account for a significant share of a retailer’s total sales.”^{iv} The proposed changes hurt our small business owners who invest in our neighborhoods with higher poverty rates.

In conclusion, the proposed changes to the “broad based categorical eligibility” in USDA’s Supplemental Nutrition Assistance Program (SNAP) published in the Federal Registry on July 23, 2019 will negatively impact access to food security, weaken households’ self-sufficiency and stability, and harm Spokane’s economy.

Sincerely,

A handwritten signature in black ink that reads "Ben Stuckart".

Ben Stuckart
President, Spokane City Council

ⁱ Email correspondence with Shane Riddle, Senior Policy Advisor Economic Services Administration Washington State Department of Social and Health Services 8/28/19

ⁱⁱ Higher Vehicle Exclusions and Asset Limits in SNAP May Encourage Asset Accumulation Among Low-Income Households; <https://www.ers.usda.gov/amber-waves/2019/march/higher-vehicle-exclusions-and-asset-limits-in-snap-may-encourage-asset-accumulation-among-low-income-households/>

ⁱⁱⁱ Quantifying the Impact of SNAP Benefits on the U.S. Economy and Jobs; <https://www.ers.usda.gov/amber-waves/2019/july/quantifying-the-impact-of-snap-benefits-on-the-us-economy-and-jobs/>

^{iv} SNAP Boosts Retailers and Local Economies; <https://www.cbpp.org/research/food-assistance/snap-boosts-retailers-and-local-economies>