

May 13, 2016

Ms. Mary Rose Conroy

Program Design Branch Policy Design Division

USDA Food and Nutrition Service (FNS)

3101 Park Center Drive, Room 810

Alexandria, VA 22302

**Re: Proposed Rule on Supplemental Nutrition Assistance Program (SNAP) Promotion,  
Docket RIN 0584-AE44**

Dear Ms. Conroy:

On behalf of the Hunger Free Colorado please accept these comments on the United States Department of Agriculture's (USDA's) Food and Nutrition Service (FNS) Proposed Rule on SNAP Promotion.

**Background**

Hunger Free Colorado leads efforts to connect families and individuals to food and nutrition resources, and to create positive changes in systems, policies and social views, so no Coloradan goes hungry. Hunger Free Colorado brings a unified, statewide voice to the issue and solutions surrounding hunger. We believe nutritious food is a basic human right and that hunger is solvable, unnecessary and unjust.

Hunger is both widespread and often invisible in Colorado. More than 1 in 4 working families in Colorado do not have enough food to meet their basic needs. About 23,500 veterans in Colorado live in households that participated in food stamps at some point during the past 12 months. More than 1 in 7 Colorado seniors struggle with hunger, often leading to choices between food and medication.

SNAP is a vital support for many needy people, but barriers to access leave troubling gaps in coverage. About 255,000 Coloradans, including 130,000 children, were lifted out of poverty due to food stamps between 2009 and 2013. Yet, we still rank near the bottom of national participation rates, with only 59% of eligible households participating in these basic anti-hunger benefits.

SNAP outreach and application assistance can help clients navigate the eligibility system and get

the SNAP benefits to which they are entitled.

In FY2015, Hunger Free Colorado outreach efforts have taken over 5,530 Hunger Hotline calls from hungry families throughout the state, and resulted in over 879 SNAP applications. In addition, Hunger Free Colorado provides on-site outreach at 42 sites, which has generated an additional 1,123 SNAP applications this year to date. The Feeding America 2015 Impact Calculator estimates this efforts have created over \$3.4 million in benefits, or close to 1,156,373 meals. Our hotline has bilingual capacity, and therefore we provide a specialized service for non-English speaking populations. These outreach efforts were integral in helping feed the 1 out of 5 food insecure children in Colorado who do not know where their next meal is coming from.

### **Recommendations for the Final SNAP Promotion Rule**

#### **A. The SNAP rule should allow SNAP outreach organizations to help SNAP applicants make an “informed choice”**

We appreciate that USDA recognizes the importance of funding SNAP outreach, education and information activities. We also appreciate that USDA has already defined what is allowed as informed choice and has underscored this point in the proposed rules by including in the introductory background (preamble) the following statement: “The regulations already define recruitment activities as activities that are designed to persuade an individual who has made an informed choice not to apply for SNAP benefits to change his or her decision and apply.”

We think it is very important that the final SNAP regulations include language that reinforce that SNAP outreach organizations are permitted to help applicants make an “informed choice.” This language is important us because many times individuals may be reluctant to apply because of rumor or misinformation about the program. For example:

1. Receiving SNAP benefits as a non-citizen will negatively impact future eligibility for citizenship.
2. Undocumented immigrants who apply for SNAP for their children will be reported to the Immigrations and Customs Enforcement (ICE).
3. Children who use SNAP benefits will later have to "pay back" benefits as adults.
4. Using food stamps means that someone else who may "need benefits more" cannot have them.
5. SNAP benefits are garnished from your future tax refund, even if fraud or administrative errors do not occur.

We believe that Congress intended the 2014 Farm Bill to ensure that SNAP outreach organizations can continue to share factual information about SNAP and that providing factual information is not inappropriate persuasion. Congress expects that individuals would continue to be allowed to make an “informed choice” to apply or not apply for SNAP and that SNAP outreach partners like Hunger Free Colorado can provide that valuable service. Follow-up

questions to potential SNAP applicants often are necessary to help identify whether a perceived lack of interest in applying is based on myths or other incorrect facts about SNAP.

We recommend that the final SNAP final rule clearly include the long-standing “informed choice” standard of the SNAP outreach rules and that FNS should make it very clear that such a follow-up inquiry by itself does not constitute undue “persuasion.

**B. The SNAP rule should clarify that specialized or targeted services can be provided to all low income individuals**

We appreciate USDA’s statement in the introduction that Congress did not intend to prohibit providing application assistance to vulnerable populations, including the elderly, homeless, and individuals with disabilities. Thank you.

We recommend USDA include additional information to clarify that application assistance and specialized services can be provided to all individuals, not just so-called vulnerable populations cited in the preamble. For example, targeted SNAP outreach can be important for limited English proficient populations, households participating in work support programs such as Medicaid, TANF or child care assistance, pregnant woman receiving WIC only benefits, those supplementing their household grocery budgets with food from pantries or soup kitchens, recently unemployed families in a factory town that has lost its primary business or a community that has suffered severe weather and power outages that do not rise to the level of a Presidential declared disaster.

There are many situations where specialized or targeted outreach is appropriate and we urge USDA to allow SNAP outreach partner discretion to determine this on a local level.

**C. Social Media and Advertising**

We also support USDA’s decision to not barring promotion of SNAP on social media. Thank you. Social media is an increasingly important form of communication among many populations. Social media outreach is important to dispel the many myths surrounding the SNAP program and providing individuals the tools they need, including on-line screening tools, to learn more on their own.

Thank you for your consideration of our views.

Sincerely,

**Cate Blackford**

**Director of Public Policy**

**Hunger Free Colorado**