

State of New Mexico

Michelle Lujan Grisham Governor

September 23, 2019

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

Dear Secretary Perdue:

I write to fervently voice my opposition to the U.S. Department of Agriculture's (USDA) proposal to essentially eliminate Broad-Based Categorical Eligibility (BBCE) from the Supplemental Nutrition Assistance Program (SNAP).

New Mexico utilizes BBCE to adopt less restrictive income and asset tests to better coordinate SNAP with other state-operated programs such as Temporary Assistance for Needy Families (TANF). The result has been an increase in low-income households getting access to the food assistance they need, while also making SNAP easier and less costly for the state to administer.

As the USDA's own analysis reflects, many of those impacted would be among the most vulnerable, including individuals with disabilities and the elderly. In New Mexico, thousands of beneficiaries would lose access to basic food assistance. Along with those USDA already identified, others impacted would be single parents going to college and over 5,600 children under 17 years old. New Mexico is the hungriest state in the nation, with the highest rate of child food insecurity at over 24 percent and the highest rate of overall food insecurity at almost 17 percent. In some counties, as many as one out of three New Mexico children do not have access to healthy food essential for optimal health, development, and academic achievement.

Hungry kids in school can't focus. Should this proposed rule take effect it would eliminate automatic enrollment for kids in SNAP families, which allows them to participate in free and reduced-price lunch and breakfast programs in schools. This will weaken our first line of defense in preventing child hunger and exacerbate the negative impacts of food insecurity on children during critical stages of development.

¹ USDA Proposed Rule, "Revision of Categorical Eligibility in SNAP," July 24, 2019.

This is a cruel and unnecessary policy change that will hurt many hard-working families in New Mexico who are trying as hard as they can to put food on the table. It specifically targets those who are working to create a positive change in their circumstances. Moreover, it is anathema to our duty to provide for vulnerable children. As Governor, I take that responsibility very seriously.

I strongly oppose this rule change and urge you to abandon this proposal and allow SNAP, our nation's most effective tool in the fight against food insecurity, to do what it has done for decades: feed hungry children and families.

Sincerely,

Governor Michelle Lujan Grisham

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