



September 20, 2019

Program Design Branch
Program Development Division
Food and Nutrition Service, USDA
3101 Park Center Drive
Alexandria, VA 22302

RE: Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program;
Docket ID: FNS-2018-0037

To Whom It May Concern:

On behalf of Children's Hospital of Wisconsin (Children's), we appreciate the opportunity to comment on the Food and Nutrition Services' Notice of Public Rule Making for "Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP)" published on July 24, 2019. Children's has significant concerns with the proposed rule's impact on children's health and well-being and urges the Agency to reconsider this proposal.

Children's is the state's only independent health care system dedicated solely to the health and well-being of children. We serve children from every county in the state at our inpatient hospitals in Milwaukee and the Fox Valley and at more than 30 primary, specialty and urgent care clinics. We care for every part of a child's health, from critical care at one of our hospitals, to routine checkups in our primary care clinics. Children's focuses on all elements of pediatric well-being by providing school health nurses, dental care, foster care and adoption services, family resource centers, child health advocacy, health education, child welfare services, pediatric medical research and the statewide poison hotline.

Through our work with children and families, Children's recognizes the impact that social determinants of health have on overall child health and well-being. That's why Children's is committed to helping families address these essential needs, including access to medical care, safe and affordable housing, and healthy, nutritious food, to help improve child health outcomes. Children's has invested in community health navigators, school nurses and other resources and partnerships to both identify these essential health needs and connect families with support services to address them. In particular, food insecurity in households with children is associated with numerous adverse outcomes, including poorer health, higher rates of hospitalizations and depression, and lower academic performance.¹

SNAP, known as FoodShare in Wisconsin, plays a vital role in improving nutrition and health for thousands of Wisconsin children facing food insecurity. In Wisconsin, approximately 41 percent of individuals receiving SNAP benefits each month are children.² Importantly, the categorical eligibility process in Wisconsin was designed to reduce the administrative burdens of enrollment and provide stability for families who are working to earn their way up the economic ladder.

¹ Food Insecurity and Health Outcomes. Gundersen, C. & Ziliak, J.P. (2015). *Health Affairs*. <https://www.healthaffairs.org/doi/full/10.1377/hlthaff.2015.0645>

² Lt. Gov. Mandela Barnes testimony, US House Repts. Agriculture Committee, June 20, 2019.



We are very concerned that the proposed rule to restrict state flexibility to utilize categorical eligibility would take Wisconsin in the wrong direction and increase the number of children at risk of hunger or food insecurity. According to state and other estimates, as many as 24,000 children could lose access to nutritious food benefits under the proposed rule.³ Restricting SNAP eligibility would also place these vulnerable children at risk to lose access to free or reduced price breakfasts and lunches at their schools. School districts in the state have reported concerns that this change could impact an even broader set of children as a result of community eligibility which allows schools that serve a certain percentage of SNAP-eligible children to provide reduced price meals to all students.⁴ According to the Centers for Disease Control and Prevention, “students that participate in school meal programs consume more milk, fruits and vegetables during meal times and have better intake of certain nutrients”. Additionally, eating breakfast at school is associated with “better attendance rates, fewer missed school days and better test scores.”

At Children’s, we are deeply committed to our mission that the children of Wisconsin will be the healthiest in the nation. We know that children must have adequate access to nutritious foods to help ensure they are at their best physical, behavioral, social and educational health and to position them well to thrive into adulthood. We believe that the proposed rule will create unnecessary barriers for children and families we care for to access healthy foods and we urge you to reconsider this proposal.

Sincerely,

A handwritten signature in black ink that reads "Heather Paradis". The signature is fluid and cursive, with a large initial "H" and "P".

Heather Paradis, MD, MPH
Medical Director, Community Services
Children’s Hospital of Wisconsin

³ Ibid; State-by-State Impact of Proposed Changes to “Broad-Based Categorical Eligibility” in SNAP. <https://www.mathematica-mpr.com/dataviz/impact-of-bbce-proposal-on-snap-caseloads>

⁴ As new school year approaches, Trump food stamp cuts likely to cost some students free lunch. Groth, A. (August 7, 2019). *Milwaukee Journal Sentinel*. <https://www.jsonline.com/story/news/2019/08/07/some-wisconsin-students-could-lose-free-lunch-under-trump-proposal/1819652001/>