



Revision of Categorical Eligibility in the Supplemental Nutrition Assistance

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Thank you for the opportunity to comment on the proposed revision to the rules governing categorical eligibility for SNAP. I am a doctoral candidate in the department of public policy at the University of North Carolina, Chapel Hill, currently working on my dissertation regarding state administration of federal assistance programs since the passage of PRWORA (P.L. 104-193) in 1996. I would like to register my concern regarding the proposed revision to rules governing categorical eligibility for SNAP.

Eliminating broad-based categorical eligibility (BBCE) for food stamps would be ill advised, not only from the perspective of the many American who stand to lose access to a vital portion of the social safety net, but also in regards to the state and county agencies and departments of social services who administer the safety net programs. The use of BBCE to ease the administrative burden of these social service employees is a vitally important tool to which state governments should retain access. Furthermore, the statutory requirements mandated in the block grant funding structure mean that continuing to allow certain households access to SNAP, even if they are not in continuous receipt of TANF funds or services, is in a state's interest. FNS, and USDA more broadly, seem to indicate their opposition to patchwork rules governing eligibility for SNAP, preferring instead to reabsorb this decision-making authority to the federal level. This is a hypocritical stance that flies in the face of Conservative ideology as well as the recent trend (and the current administration's stated goal) of moving funding in the direction of block grants.