



September 14, 2019

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

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

Dear Secretary Perdue,

I am writing on behalf of the League of Women Voters of West Virginia to oppose the proposed rule to eliminate SNAP's broad-based categorical eligibility (BBCE) option that allows states to streamline the process for households with slightly higher incomes that still experience financial hardship to participate in SNAP.

SNAP plays a critical role in food security in West Virginia. In fiscal year 2017, SNAP benefits reached 340,000 West Virginia residents, or 19% of our state population. Eliminating the BBCE option would deny access to food assistance to more than 3 million people, including thousands of West Virginians, and punish families for saving money for emergencies or for their children's future.

This proposed policy change would also be counterproductive and remove incentives for people to enter and stay in the workforce. Allowing them to continue to receive assistance lets them focus on being successful rather than having to worry about how they will pay for food.

Additionally, this attack on those struggling to get by sidesteps Congress by eliminating an option that has been in place for more than 20 years and was recently upheld in the bipartisan 2018 Farm Bill. Eliminating this option takes food off the tables of working individuals and families, children, seniors, and people with disabilities.

The League of Women Voters supports programs and policies to prevent or reduce poverty and to promote self-sufficiency for individuals and families, and believes those who are unable to work, whose earnings are inadequate or for whom jobs are

not available have the right to an income and/or services sufficient to meet their basic human needs for food, shelter, and access to health care.

SNAP helps millions of Americans and thousands of West Virginians make ends meet. Please reject these unnecessary changes to this proven program.

Sincerely,

A handwritten signature in black ink that reads "Jonathan Rosenbaum". The signature is written in a cursive style with a large, prominent initial "J".

Jonathan Rosenbaum, President  
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