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Jennifer Carr Allmon
EXECUTIVE DIRECTOR

September 20, 2019

Program Design Branch
SNAP Program Development Division
Food and Nutrition Service, USDA
3101 Park Center Drive
Alexandria, VA 22302
Submitted via Email to: SNAPPDBRules@usda.gov.

RE: Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP) Proposed Rule RIN 0584-AE62; Docket No. FNS-2018-0037; 7 CFR Part 273 Citation 84 Fed. Reg. 142 (July 24, 2019)

Dear Sir or Madam,

The Texas Catholic Conference of Bishops (TCCB) wishes to express its concern with the [proposed rules](#) ("Revision of Categorical Eligibility in the SNAP") to change longstanding categorical eligibility requirements in the Supplemental Nutrition Assistance Program (SNAP) based on receipt of Temporary Assistance for Needy Families (TANF) benefits. As bishops representing almost 9 million Catholics in Texas, including poor and vulnerable parishioners who rely on food assistance, we call upon the U.S. Department of Agriculture to withdraw this proposed rule. At the very least if the rule is implemented, we request that a demonstration waiver be granted for state flexibility related to clients in innovative programs on a path to full self-sufficiency.

Inspired by both Scripture and Tradition, the social teaching of the Catholic Church promotes what is called the preferential option for the poor:

"The Church's love for the poor. . . is a part of her constant tradition." This love is inspired by the Gospel of the Beatitudes, of the poverty of Jesus, and of his concern for the poor. Love for the poor is even one of the motives for the duty of working so as to "be able to give to those in need." It extends not only to material poverty but also to the many forms of cultural and religious poverty" (Catechism of the Catholic Church #2444).

This preferential option extends to the prioritizing in our policies and programs for the poor and vulnerable who suffer from food insecurity: "Concern for the

health of its citizens requires that society help in the attainment of living-conditions that allow them to grow and reach maturity: food and clothing, housing, health care, basic education, employment, and social assistance” (Catechism of the Catholic Church #2288).

The Food and Nutrition Act sets parameters regarding the income and resource limits that households receiving SNAP must meet. Categorical eligibility applies when the conferring program has properly determined eligibility. Texas is [one of 42 other states that participates in categorical eligibility](#) and has done so since 2002. The proposed rule would make the SNAP program less efficient, discourage saving, and curb the ability of states to set eligibility requirements for the food assistance program that helps feed millions each year.

In partnership with the faith-based community, including our various ministries at Catholic Charities, St. Vincent de Paul Societies, Catholic schools and parishes, the state has a role to ensure that those who are facing hunger have access to food in order to assuage this most fundamental human need.

First, the Supplemental Nutrition Assistance Program serves [about 1.5 million vulnerable Texans](#) each year. In August 2019, Texas distributed \$391.3 million in SNAP benefits that averaged about \$261 per person. SNAP is often the last line of defense against hunger and aims to improve food security by providing consistent, adequate access to enough food to support an active, healthy life. Furthermore, the program is [effective, efficient, and cost-effective with a low error rate and rigorous quality control system](#).

In Texas, the SNAP program is [administered by the Texas Health and Human Services Commission](#) (HHSC). In order to qualify for Texas SNAP, applicants must be a Texas resident and fall into one of two groups: (1) those with a current bank balance (savings and checking combined) under \$2,001, or (2) those with a current bank balance (savings and checking combined) under \$3,001 who share their household with a person or persons age 60 and over, or with a person with a disability (a child, spouse, a parent, or yourself).

While SNAP rules and benefit levels are generally set at the federal level, states can tailor aspects of the program according to their needs. The proposed rules would especially be damaging for Texas because they impose an outdated \$4,650 vehicle limit and a possible roll back of the income limit to 130%. Furthermore, a substantial number of households in Texas (11-15%) would lose eligibility, many of them near-poor and having an elderly family member, child, and/or family member with disabilities. There may also be an increase in SNAP administrative costs, with much of that having to be absorbed by state and local communities that are still reeling from natural disasters and recent tropical storms.

Secondly, the proposed rules would limit SNAP/TANF automatic eligibility to households that receive substantial, ongoing TANF-funded benefits aimed at helping families move towards self-sufficiency. However well-intentioned to address loopholes and limit abuse, the proposed rules would limit how states confer “categorical eligibility” on those who have already been certified for similar programs and hamstringing their ability to custom-tailor programs that aim to promote the Administration’s goal of self-sufficiency.

For example, during the 86th session of the Texas Legislature, the TCCB helped pass [H.B. 1483](#). This bill was passed with bipartisan support and signed by Governor Greg Abbott. The bill, referred to as the “Making Work Pay” bill, addressed the immediate drop off that occurs when a wage earner from a family receiving a public benefit program begins to work or receives a small raise and then loses all their benefits. The legislation created a pilot program for self-sufficiency for persons receiving financial assistance or SNAP benefits. The aim of the program is to promote long-term self-sufficiency by testing the effects of a

slow reduction of public assistance payments on the benefits cliff. Additionally, the law requires providers to offer intensive case management as part of the solution.

This bill was inspired by a Catholic Charities program from the Diocese of Fort Worth, known as the [Padua Project](#). The project is an innovative model that moves beyond one-off programmatic interventions and instead is designed to support clients across all interconnected areas that contribute to long term growth and success through case management, individualized strengths-based asset plans, and community support systems. Over a period ranging from two to five years, the pilot will serve over 500 recipients of TANF and SNAP. There is also opportunity to expand the program by 20 percent every year. [Early data is promising](#), with improved retention rates, increased incomes, higher savings rates, and reduced debt among clients. This is exactly the type of innovative model that moves families off public assistance and into self-reliance. The proposed rules would prohibit implementation of the state pilot and create a major barrier to the self-sufficiency that our families are achieving.

If this model continues to be successful, we hope it will be replicated it in other areas of Texas and in ministries across the country. However, that will not be possible if these rules come into effect or if states like Texas are not granted a demonstration waiver for programs like those promoted by H.B. 1483 which incentivize and promote self-sufficiency for individuals that utilize these programs.

Poverty and long-term food insecurity cannot be solved by the Church or the State alone. It is by working together, buttressing essential programs, and not imposing a one-size fits all model that will allow us to discover, develop, and test poverty-fighting programs that help reach our shared goal of self-sufficiency. From the beginning of our nation's founding, the Catholic Church in the United States has consistently advocated for the poor and vulnerable. Rooted in the Gospel, the Catholic Bishops of Texas communicate their concern today and ensure you of our continued prayers and our support as we collaborate to feed the hungry, care for the stranger, clothe the naked, and visit the prisoner.

As Pope Francis said in a [message published by the Vatican](#), the goal of ensuring food security "can no longer be put off" and that only an effort "inspired by authentic solidarity will be capable of eliminating the great number of persons who are undernourished and deprived of the necessities of life." For the foregoing reasons, we respectfully ask that you withdraw the proposed rules or if the rules are implemented we ask that you grant a demonstration waiver that will allow us to assist our poor and vulnerable brothers and sisters as they transform their lives out of poverty.

Sincerely,



Jennifer Allmon
Executive Director

The Texas Catholic Conference of Bishops is the association of the Roman Catholic bishops of Texas. Through the TCCB, the bishops provide a moral and social public policy voice, accredit the state's Catholic schools, and maintain archives that reflect the work and the history of the Catholic Church in Texas.