



NATIONAL ENERGY ASSISTANCE DIRECTORS' ASSOCIATION

December 2, 2019

SNAP Certification Policy Branch,
Program Development Division
Food and Nutrition Services
3101 Park Center Drive
U.S. Department of Agriculture
Alexandria, VA 22302

Re: Notice of Proposed Rule Making Regarding Supplemental Nutrition Assistance Program (SNAP) Standardization of State Heating and Cooling Standard Utility Allowances -- RIN 0584-AE69

Submitted via Regulations.gov

Dear SNAP Certification Policy Branch:

On behalf of the National Energy Assistance Directors Association (NEADA), we appreciate the opportunity to comment on USDA's Notice of Proposed Rule regarding [Supplemental Assistance Nutrition Program \(SNAP\) Standardization of State Heating and Cooling Standard Utility Allowances](#). The National Energy Assistance Directors Association (NEADA) represents the state directors of the Low Income Home Energy Assistance Program (LIHEAP). Each year state LIHEAP programs process applications for energy assistance from about six million low income households, many of whom also receive SNAP benefits.

We appreciate the Department's stated goal to better target standard utility allowance calculations to reflect the cost of home energy for low-income households. However, the proposed revisions to the SUA do not address the wide variation between fuel types or households with high energy costs. Moreover, the proposed changes would result in cuts in basic assistance to 7 million people in 3 million households, disproportionately impacting households with seniors and individuals with disabilities. Our organization knows too well that low income households struggle to afford their basic utility costs. Any proposal that targets cuts at families with utility costs should be reconsidered in light of the needs these families face.

While the proposed Standard Utility Allowance (SUA) factor will capture home energy costs for some SNAP households in the state it will not reflect actual costs for many families. The data sources that the Department proposes to use are flawed with respect to capturing accurate out of pocket spending by low income households on utility costs. Moreover, the Department did not explain its proposed methodology in sufficient detail or explain why it is preferable to methodologies that states currently use.

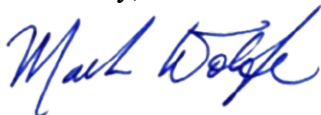
LIHEAP has created a roadmap that states can follow to improve the targeting and accuracy of their SUAs. LIHEAP benefits are calculated using several factors including a household's actual or estimated home energy costs based on recent energy bills as well as household size and housing type. Estimated costs are based on the actual cost data from other households in the state. The result is an energy factor that is reflective of actual fuel expenditures.

The LIHEAP statute requires states to provide higher benefits to households with higher energy burdens. As a result, data collected for state performance measures track households with high energy burdens by fuel type to ensure state LIHEAPs are complying with federal requirements. State SNAP offices can use this data to better understand the energy assistance needs of their customers.

We are especially concerned about the proposed rule's impact on low income families with high energy burdens as well as those using high cost delivered fuels such as propane and heating oil. Energy costs vary widely by region and by fuel type. The October 2019 US Energy Information Administration Winter Fuels Outlook report projected the cost of home heating in the Northeast for those using natural gas at \$712, electricity at \$1,391, heating oil at \$1,501, and propane at \$1,658. An SUA set at 80% of an estimate of the states' distribution of out of pocket expenses will not reflect the variation in costs by heating fuel type.

We strongly encourage you to reconsider your approach and we suggest that you provide states with more tools and technical assistance within current flexibility to capture utility costs using locally available data. We would be willing partners with you in this effort.

Sincerely,

A handwritten signature in blue ink that reads "Mark Wolfe". The signature is written in a cursive, flowing style.

Mark Wolfe
Executive Director