

November 1, 2019

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

To whom it may concern:

Thank you for the opportunity to respond to the Proposed Rule on Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP) (FNS Docket No. FNS-2018-0037) during the reopening of the comment period (RIN 0584-AE62).

The Blue Cross and Blue Shield of North Carolina Foundation is an independent, private grantmaking organization established in 2000 by Blue Cross and Blue Shield of North Carolina. Since our founding we have invested \$140 million into communities across the state through more than 1,000 grants to fulfill our mission of improving the health and well-being of North Carolinians. One of our primary areas of focus is food and nutrition and therefore this issue is of great interest to our organization.

When you consider the many factors that determine health, one of the most significant is food. Therefore, any action being considered that would limit or reduce access to food, in particular food for children, will have long-term and significant consequences that must not be overlooked. Unfortunately, reducing access to food is what will result from the proposed revision to categorical eligibility in SNAP, which is why we appreciate this opportunity to comment and raise these concerns.

According to the North Carolina Department of Health and Human Services, it is estimated that this change will end SNAP benefits for almost 50,000 North Carolina households totaling nearly 100,000 individuals. It would also impact eligibility for free and reduced-price school meals for more than 30,000 North Carolina children under the age of 18. In North Carolina, for many of these children, school meals are the only food they can count on and are the primary source of their nutrition.

This matters deeply to us as an organization that views increasing access to healthy food as a cornerstone to improving the health and well-being of North Carolinians. Over the past two decades, the Blue Cross and Blue Shield of North Carolina Foundation has invested more than \$40 million into opening avenues to healthy food, largely impacting children. For example, our investments have been significant in helping to expand the state's farm to school network; integrating on-site gardens into education settings; and training school nutrition staff to increase the use of fruits, vegetables, and whole-grain rich foods.

The potential short-term cost savings of this proposed change must be weighed against the long-term costs. For one, food insecurity – which this rule change will contribute to nationally – currently adds \$53 billion a year in health care spending.<sup>1</sup> And this number will go up with Medicaid and Medicare shouldering much of the cost.

However, the costs run much deeper than financial when you consider the impact of food insecurity on our youngest Americans. Children who are food insecure and lack access to healthy food struggle in terms of cognitive, emotional, and physical development; are two times as likely to be in poor health; are more likely to have mental health problems; and are more likely to repeat a grade or fail to graduate.<sup>2</sup> As a result, children who are food insecure are less prepared for today’s workforce.

Because approximately 1 in 7 children in the U.S. lack access to adequate food and nutrition, increasing to 1 in 5 in North Carolina,<sup>3</sup> public programs such as SNAP and free and low-cost school lunch build a critical infrastructure, resulting in children who are well-nourished, healthy, and strong. These are important investments in the future of our country – especially for rural states like North Carolina – and are essential programs that enhance the health of our children, help to grow tomorrow’s adults, and ensure American prosperity.

Thank you once again for the opportunity to comment on the proposed rule and reconsidering its implementation.

With most sincere appreciation,

A handwritten signature in black ink, appearing to read "John R. Lumpkin". The signature is fluid and cursive, with a large initial "J" and "L".

John R. Lumpkin, MD, MPH  
President

<sup>1</sup> Berkowitz SA, Basu S, Gundersen C, Seligman HK. State-Level and County-Level Estimates of Health Care Costs Associated with Food Insecurity. *Prev Chronic Dis* 2019;16:180549. DOI: <http://dx.doi.org/10.5888/pcd16.180549>

<sup>2</sup> Hickson M, Ettinger de Cuba S, Weiss I, Donofrio G, Cook J, *Too Hungry to Learn: Food Insecurity and School Readiness*. Children’s HealthWatch, 2013. Accessed October 30, 2019. [https://childrenshealthwatch.org/wp-content/uploads/toohungrytolearn\\_report.pdf](https://childrenshealthwatch.org/wp-content/uploads/toohungrytolearn_report.pdf)

<sup>3</sup> *Map the Meal Gap 2019*. Feeding America, 2019. Accessed October 30, 2019. <https://www.feedingamerica.org/hunger-in-america/north-carolina>