December 2, 2019

Ms. Sasha Gersten-Paal
Chief, Certification Policy Branch
Program Development Division
Food and Nutrition Service, USDA
3101 Park Center Drive, Room 812
Alexandria, VA 22302


Dear Ms. Gersten-Paal:

The Los Angeles Homeless Services Authority (LAHSA) submits its response to the request for comment regarding Supplemental Nutrition Assistance Program: Standardization of State Heating and Cooling Standard Utility Allowances (Docket No. FNS-2019-0009). LAHSA is a joint-powers authority of the City and County of Los Angeles and serves as the lead agency in the LA CoC and is responsible for funding a significant portion of the interim housing, permanent housing, and supportive services for people experiencing homelessness in Los Angeles County.

LAHSA is opposed to the U.S. Department of Agriculture’s (USDA) proposal to alter the methodology used to calculate standard utility allowances (SUAs) for the Supplemental Nutrition Assistance Program (SNAP), as it will decrease vital assistance for vulnerable families throughout California.

SNAP is the nation’s most important anti-hunger program, supporting 42 million households nationwide, with four million in California comprised mainly of working families with children who have incomes at or below 50% of the federal poverty line. SNAP has also been linked to improved health outcomes and lower health care costs, but if USDA’s proposed changes go into effect, benefits for lower-income households would be cut in almost every single state by a total of about $4.5 billion nationally over the next five years – affecting over 19% of households nationwide.

States may set their SUAs higher than the average low-income utility cost in order to minimize benefit loss for households with very high utility expenses. California has the second highest wage needed to afford adequate housing in the country and in Los Angeles County alone,

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there are over 555,000 households paying more than 50% of their income on rent\textsuperscript{6} – the SUA is therefore essential to supporting millions of cost-burdened Californians.

Furthermore, the federal government is already employing a conservative measure of estimating the number of California residents who live in poverty. Using a supplemental poverty measure that considers housing and utility costs, the U.S. Census Bureau estimated that 19% of California’s population was living in poverty, compared to only 13.4% under the standard measure – a difference of almost 2.2 million individuals.\textsuperscript{7} Policymakers have long recognized that living expenses vary from state to state and have compensated by allowing localities to calculate their own SUAs. By removing this flexibility from SNAP, USDA will be decreasing a family’s nutrition assistance and limiting their resources available for other basic necessities such as housing, childcare, and healthcare. Many of the households who rely on SNAP are one emergency away from homelessness; without a full SNAP benefit, their limited income will be stretched even further. In 2019, over half of newly homeless individuals in the LA CoC cited an “economic hardship,” including unemployment or financial reasons such as eviction or foreclosure as a leading factor to experiencing homelessness.\textsuperscript{8}

Instead of creating a standard cap for all SUAs across the country, USDA should provide guidance and technical assistance for states on how to accurately calculate an SUA. While we appreciate the USDA’s attempt to streamline processes and reduce burden, removing needed SNAP benefits from lower-income families is not the answer. We welcome an opportunity to work with the Administration on alternate ways to create efficient and effective benefit systems that do not put more households at risk of homelessness.

Sincerely,

\[ Signature \]

Heidi Marston
Chief Program Officer

\textsuperscript{6} California Housing Partnership. (2019). \textit{Los Angeles County Annual Affordable Housing Outcomes Report.}

\textsuperscript{7} U.S. Census Bureau. (2018). \textit{The Supplemental Poverty Measure: 2017.}

\textsuperscript{8} Los Angeles Homeless Services Authority. (2019). \textit{Greater Los Angeles Homeless Count Results.}