



March 10, 2020

**The Honorable Maggie McIntosh  
Appropriations Committee  
House Office Building  
6 Bladen Street  
Annapolis, MD 21401**

**Testimony IN FAVOR of  
HB 1532, the Protect Against Hunger Act  
Position: SUPPORT**

Chair McIntosh and Members of the Committee, Share Our Strength's No Kid Hungry Maryland campaign strongly supports HB 1532, the Protect Against Hunger Act. HB 1532 will guard vulnerable Maryland families against cuts in nutrition assistance resulting from the U.S. Department of Agriculture's ("USDA") pending and future rules that limit eligibility for the Supplemental Nutrition Assistance Program ("SNAP").

No Kid Hungry Maryland is a campaign of national anti-hunger organization Share Our Strength. Since 2008, Share Our Strength's No Kid Hungry Maryland campaign has worked with partners, schools and advocates to end childhood hunger throughout the state. No Kid Hungry Maryland leads the Partnership to End Childhood Hunger in Maryland.

One out of every seven kids in Maryland is growing up in a family that struggles with hunger. SNAP is a vital support to many families, and it serves as the front line of defense against poverty, food insecurity, and the long-term detriments they cause. Indeed, based on data from 2009 to 2012, SNAP kept 104,000 people out of poverty in Maryland, including 47,000 children, each year.<sup>1</sup>

Despite the many demonstrated benefits of SNAP, USDA has issued three rules, one already finalized, which may impact eligibility for SNAP in the state. These rules are:

- **Tightening Criteria for Time Limit Waivers for Able-Bodied Adults Without Dependents ("ABAWDs").** The final rule, which is effective on April 1, 2020, will limit states' ability to request a waiver to the requirement that ABAWDs meet specific work requirements. Without these waivers, many people classified as ABAWDs will only receive SNAP for a maximum of three months during a 36-month period. About half of all Maryland counties and Baltimore City are currently waived from the ABAWD work requirements under SNAP; however, when this rule goes in effect, ABAWDs will be required to document a minimum of 20 hours per week in work or job training to remain eligible to receive SNAP benefits. An estimated 11,000-15,000 people in Baltimore City alone may be negatively impacted by this policy change.<sup>2</sup>

---

<sup>1</sup> Center on Budget and Policy Priorities, Maryland Food Supplement Program (December 3, 2018), [https://www.cbpp.org/sites/default/files/atoms/files/snap\\_factsheet\\_maryland.pdf](https://www.cbpp.org/sites/default/files/atoms/files/snap_factsheet_maryland.pdf).

<sup>2</sup> Baltimore City Department of Planning, Baltimore Food Policy Initiative.



- **Restricting Broad-Based Categorical Eligibility (“BBCE”) in SNAP.** Maryland is currently one of many states that use the flexibility provided by Broad-Based Categorical Eligibility to streamline SNAP program eligibility. The proposed rule would limit the type of Temporary Assistance for Needy Families (“TANF”) benefits that may be used to convey categorical eligibility. Following the rule change, TANF benefits must be deemed “substantial” and “ongoing” for a family to qualify for SNAP categorical eligibility. As a result of this proposed change, the Urban Institute estimates that almost 75,000 Maryland residents would lose SNAP eligibility entirely.<sup>3</sup> This rule may also affect the 177,816 Maryland students that are directly certified for free school meals because of their families’ participation in SNAP. As state compensatory education funding is based on free and reduced-price school meal rates, and since the BBCE rule may affect the number of students eligible for free meals, school funding may also be negatively impacted by this change.
- **Establishing Uniform Criteria for Calculating Standard Utility Allowances in SNAP.** The proposed rule requires that states use a uniform criteria for determining standard utility allowances, which are a factor in calculating net income for SNAP eligibility. Although the proposed rule is projected to result in a net increase in SNAP benefits for Marylanders, some households may lose SNAP eligibility or experience a loss in benefits.

Collectively, USDA’s pending SNAP rules are estimated to result in 79,600 individuals in 44,700 Maryland households losing eligibility for the program.<sup>4</sup> That represents an annual loss of more than \$52 million in resources for families to feed themselves and their children. As a result, these families are more likely to experience hunger and less likely to escape the cycle of poverty. Importantly, these policy changes will also drain more than \$93.6 million out of Maryland’s economy.<sup>5</sup>

HB 1532 requires that the state use the SNAP eligibility requirements in effect on July 1, 2019 when determining program eligibility. Therefore, the bill permits those who would be otherwise ineligible under pending and future USDA rule changes to receive the assistance necessary to meet their basic needs.

The return on investment for ensuring that these families continue to receive food assistance, averaging just \$1.40 per person per meal, is significant. HB 1532 will also insulate local economies and businesses from the economic impacts likely to result from these pending cuts in SNAP benefits.

---

<sup>3</sup> Laura Wheaton, Urban Institute, Estimated Effect on Recent Proposed Changes to SNAP Regulations (November 2019), [https://www.urban.org/sites/default/files/publication/101368/estimated\\_effect\\_of\\_recent\\_proposed\\_changes\\_to\\_snap\\_regulations\\_2.pdf](https://www.urban.org/sites/default/files/publication/101368/estimated_effect_of_recent_proposed_changes_to_snap_regulations_2.pdf).

<sup>4</sup> *Id.*

<sup>5</sup> *Id.* See also Kenneth Hanson, United States Department of Agriculture, The Food Assistance National Input-Output Multiplier (FANIOM) Model and Stimulus Effects of SNAP (2010), [https://www.ers.usda.gov/webdocs/publications/44748/7996\\_err103\\_1\\_.pdf](https://www.ers.usda.gov/webdocs/publications/44748/7996_err103_1_.pdf).



In summary, USDA's new SNAP rules will cut critical assistance for thousands of food insecure families in Maryland. HB 1532 provides an important lifeline to ensure that Marylanders have access to the nutrition they need. No Kid Hungry Maryland urges a favorable report on HB 1532, so that struggling families can continue to meet their children's nutrition needs.

**Share Our Strength**  
**1030 15<sup>th</sup> Street NW**  
**Washington, DC 20005**  
**202.793.5592**  
[jbailey@strength.org](mailto:jbailey@strength.org)