Congress of the United States

Washington, DC 20515

November 18, 2026

The Honorable Brooke Rollins
Secretary, U.S. Department of Agriculture
1400 Independence Avenue, S.W.
Washington, D.C. 20250

Dear Madam Secretary:

We urge you to rescind your proposed rule, "Supplemental Nutrition Assistance Program: Reforming Categorical Eligibility" (Fed. Reg. Vol. 91, No. 72454, November 10, 2026). This rule would cut 6.3 million Americans off of the Supplemental Nutrition Assistance Program (SNAP) by rolling back a policy Congress created to permit states to extend SNAP food assistance to households that receive Temporary Assistance for Needy Families (TANF)-funded benefits. This is contrary to federal law and would make life harder for millions of families.[1] As the cost of groceries and other basic needs continue to rise,[2] the Trump administration has made life less affordable for everyday Americans. Since passage of the "One Big Beautiful Bill," SNAP participation nationwide has plummeted by more than 5.5 million people, including approximately 2 million children.[3] Implementing this rule and cutting millions more people off from vital food assistance in the middle of an affordability crisis is both illegal and cruel.

By USDA's own estimate over 6 million Americans participating in SNAP, including nearly 2 million children,[4] qualify for food assistance through broad-based categorical eligibility (BBCE). BBCE allows states the flexibility to increase SNAP's income limit and to increase or waive the asset limit to better streamline requirements between similar income-based programs, improve program administration and promote financial security for participants.[5] BBCE has been used by red and blue states alike for nearly 30 years to reduce administrative red tape, ease SNAP's benefit cliff, and allow families to save for their future. According to USDA, 46 states and territories use BBCE. [6]

Studies show that eliminating SNAP asset limits reduces administrative burden and allows low-income households to improve their savings and long-term financial security and sufficiency.[7] A higher income limit helps participants – particularly those with high rent, childcare or other costs – avoid the "benefit cliff." In the few states that do not use BBCE, the benefit cliff occurs when a household's income rises slightly above the income limit – about $35,500 annually for a household of three – and they no longer

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[1] Comment letter on "Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP)," proposed rule, Docket No. FNS-2018-0037, *Center on Budget and Policy Priorities (CBPP)*, September 23, 2019.

[2] "Consumer Price Index - October 2026," *U.S. Bureau of Labor Statistics*, November 10, 2026.

[3] "SNAP Tracker: People Are Losing Food Assistance as the Harmful 2025 Republican Reconciliation Law Is Implemented," *CBPP*, October 23, 2026.

[4] "SNAP's Broad-Based Categorical Eligibility" Supports Working Families, Older Adults, and Those Saving for the Future," *CBPP*, March 17, 2026.

[5] BBCE enables states to increase SNAP's gross income limit for BBCE participants from 130% to 200% of the Federal Poverty Guidelines (or from about $20,700 to $32,000 annually for a household of one).

[6] "Broad Based Categorical Eligibility (BBCE)," *U.S. Department of Agriculture*, June 2026.

[7] "TANF and SNAP Asset Limits and the Financial Behavior of Low-Income Households," *Pew Charitable Trusts*, September 2017; "The Unintended Consequences of SNAP Asset Limits," Urban Institute, July 2016.

qualify for food assistance and are left with fewer resources overall the following month.[8] Knowing one can earn more without jeopardizing all of one's food assistance encourages participants to succeed in the workplace and increase their earnings.

Because of this, BBCE is a lifeline for working families, seniors and disabled individuals who are close to SNAP's income limit but still struggling to put food on the table. Analysis from the Center on Budget and Policy Priorities found that working families with earnings make up approximately 3.5 million of those helped to qualify for SNAP by BBCE each month. On average, such families receive $150 per month in food assistance. Older adults and people with disabilities receiving Supplemental Security Income are also often close to, or slightly over, SNAP's income limit and make up 1.4 million of those who qualify for SNAP through BBCE each month. They receive $35 per month in food assistance on average.[9] For these households, every dollar counts.

In recent years, several historically Republican-controlled states have specifically opted-in or expanded their use of BBCE so that SNAP households would have "an incentive to accept promotions and pay raises knowing they won't immediately lose benefits," as the Ohio Department of Job and Family Services noted in October of 2024.[10] In addition to Ohio, Tennessee (2026), Alaska (July 2025), Arkansas (March 2023, limited to increasing asset limit once every 5 years) and Virginia (July 2021) have recently opted in to BBCE.

Instead of embracing the benefits of BBCE for program administration and to participants alike, the U.S. Department of Agriculture's ("the Department") proposed rule would undo decades of precedent, which has allowed states to have the ability to choose how to streamline and operate SNAP in the way that best meets the needs of their residents. If the Department moves forward with this rule, which is contrary to law, participants and states alike will pay the price.

According to the Department's own regulatory impact analysis of the proposed rule, 6.3 million individuals in 3.2 million households will lose their SNAP benefits entirely. The seniors and families impacted will lose an average of nearly $200 per month in food assistance, which is often the difference between putting food on the table and being late on rent. In total, Americans' SNAP benefits will be cut by $50.82 billion over four years.[11]

Additionally, because SNAP participation is often used to streamline eligibility for basic needs programs, the proposed rule carries negative ripple effects. USDA's own analysis estimates that, if this rule is implemented, 1.78 million children would no longer be automatically eligible for school meals because their families will lose SNAP. Of those, USDA estimates 93,000 children would be shifted from free to reduced-price school meals, and 28,000 children would lose free school meals altogether. Additionally, 42,000 children will no longer receive Summer EBT ("SUN Bucks") and 5,500 women, infants and children would be kicked off the Special Supplemental Nutrition Program for Women, Infants and Children (WIC).[12]

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[8] "How Working Families Are Affected by Restricting Broad-Based Categorical Eligibility for SNAP," *Urban Institute*, September 2019.

[9] "SNAP's Broad-Based Categorical Eligibility" Supports Working Families, Older Adults, and Those Saving for the Future," *CBPP*, March 17, 2026.

[10] "SNAP changes help recipients transition off food assistance," *Ohio Department of Job & Family Services*, October 1, 2024.

[11] "Supplemental Nutrition Assistance Program: Reforming Categorical Eligibility," Fed. Reg. Vol. 91, No. 72454, November 10, 2026.

[12] Ibid.

This rule will also increase administrative red tape for both the workers administering SNAP and for those applying for the program, *increasing* federal and state SNAP administrative expenses by $1.24 billion over five years. USDA also estimates that the increased burden on participants will amount to approximately $71.7 million over five years.[13] It is also likely that the increased administrative burden on states will result in higher error rates. In 2023, states that did not use BBCE to lift the asset test had about a 1 percentage point higher error rate due to asset test-related errors. That's enough to push many states to a higher SNAP benefit cost-shift under the "One Big Beautiful Bill."[14]

While the dire impacts of this proposal should be sufficient justification for it to be rescinded, it is also important to note that the proposed rule exceeds USDA's authority and re-raises an issue that has already been settled by Congress and a previous Trump administration rulemaking process. In 2018, House Republicans' farm bill included a highly controversial provision to roll back the BBCE state option for higher gross income limits and was unanimously opposed by House Democrats[15] and excluded from the text of the bipartisan Senate bill.[16] The final 2018 Farm Bill removed this controversial provision and passed by record margins in the House and Senate.[17] To date, no subsequent farm bills have included provisions restricting or limiting BBCE flexibilities for states.

This proposed rule comes a little over a year after the largest cut to SNAP in history, with 5.5 million people having lost food assistance due to the changes advocated for by this administration. More Americans are likely to lose food assistance if the SNAP benefit cost shift is implemented next year. We hope that you keep in mind that this rule also comes as 2026 Farm Bill negotiations are underway, which are actively threatened by this attempt to take food assistance away from an *additional* 6.3 million Americans.

This rule will increase hunger, cost states more, exacerbate the affordability crisis for millions and make passing a farm bill more complicated. With these considerations in mind, we urge you to immediately rescind the November 10 proposed rule.

Sincerely,

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[13] Ibid.

[14] "Supplemental Nutrition Assistance Program, Quality Control Annual Report, Fiscal Year 2023," *USDA, Food and Nutrition Service*, September 2025; "SNAP's Broad-Based Categorical Eligibility" Supports Working Families, Older Adults, and Those Saving for the Future," *CBPP*, March 17, 2026.

[15] "The Republican plan to tighten food stamp work requirements is advancing –without a single Democrat's vote," *Washington Post,* April 18, 2018; "Farm Bill Gets Two Days of House Rules Committee Consideration," *Roll Call*, May 14, 2018; "Farm Bill Would Impose SNAP Benefit Cliff, Taking Assistance Away from Hundreds of Thousands of Low-Income Working Households," *CBPP*, May 9, 2018.

[16] "Roberts, Stabenow Announce Bipartisan Farm Bill Passes Senate on 86-11 Vote," *Senate Agriculture Committee*, June 28, 2018.

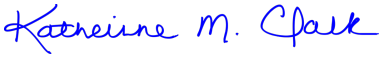
[17] "Farm bill headed to Trump after landslide House approval," *Politico*, December 12, 2018; "Senate Agriculture Committee Passes Bipartisan Farm Bill," *Senate Agriculture Committee*, June 13, 2018.



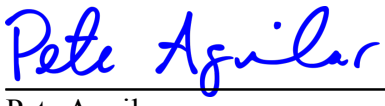
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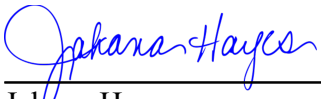
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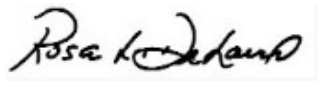
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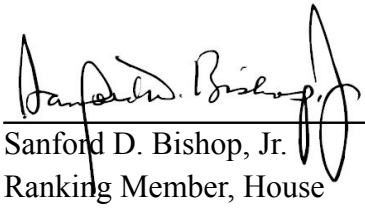
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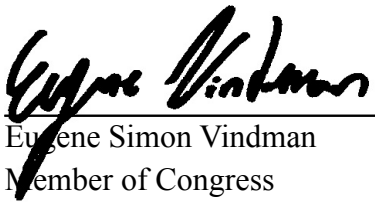
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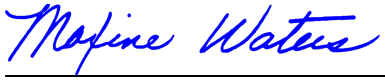
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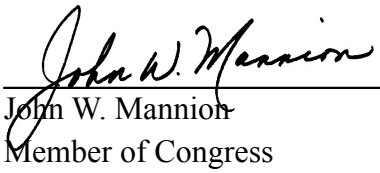
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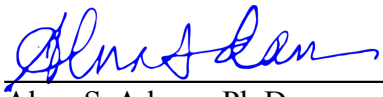
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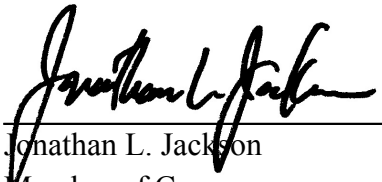
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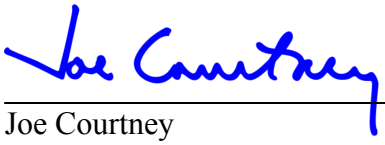
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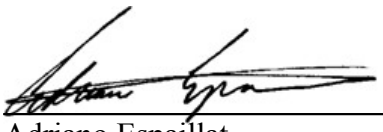
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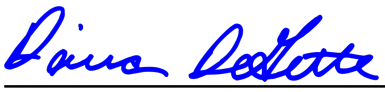
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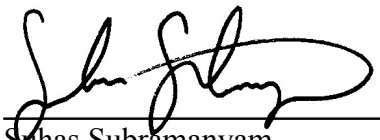
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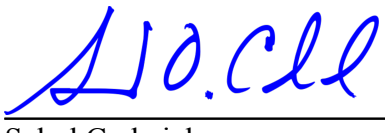
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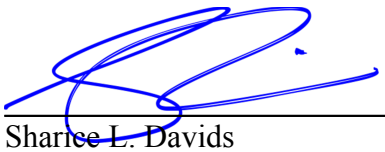
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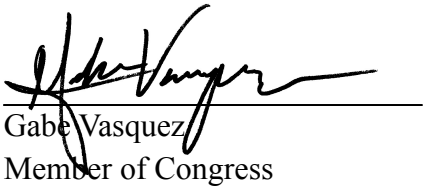
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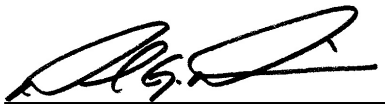
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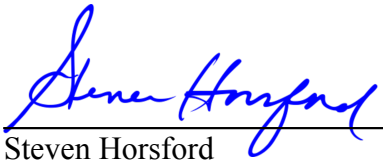
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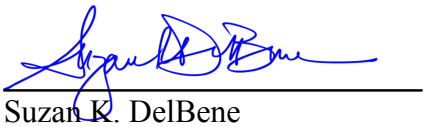
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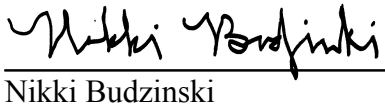
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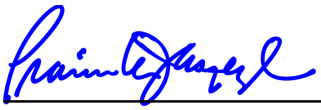
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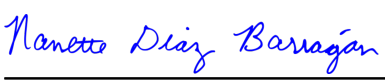
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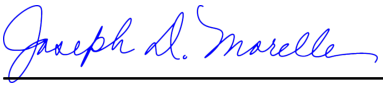
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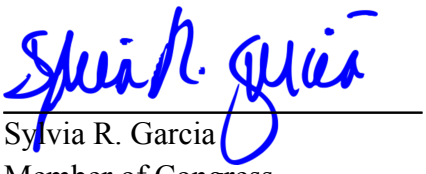
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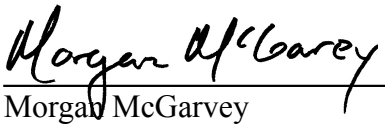
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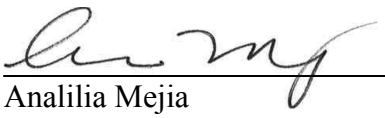
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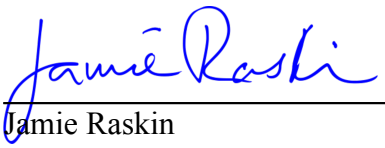
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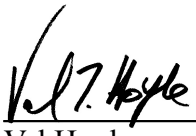
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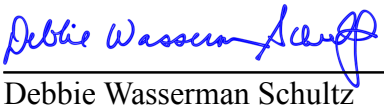
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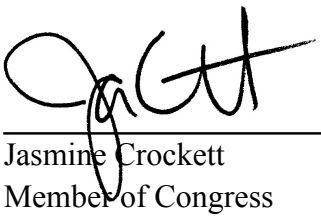
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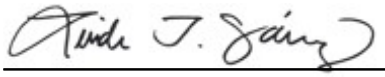
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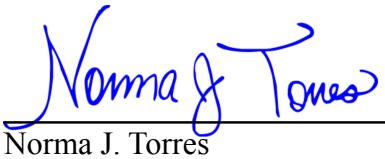
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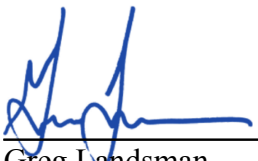
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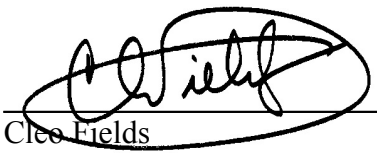
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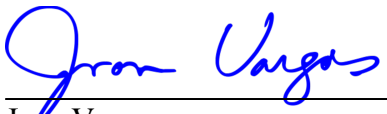
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Dave Min
Member of Congress



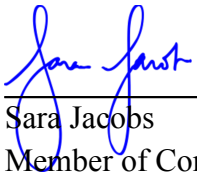
Derek T. Tran
Member of Congress



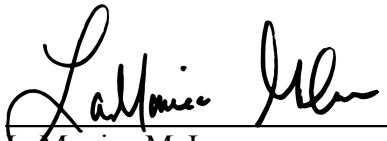
Juan Vargas
Member of Congress



Richard E. Neal
Member of Congress



Sara Jacobs
Member of Congress



LaMonica McIver
Member of Congress



Seth Moulton
Member of Congress



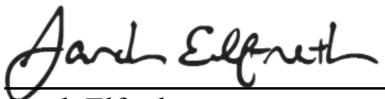
Robert C. "Bobby" Scott
Member of Congress



Doris Matsui
Member of Congress



George Whitesides
Member of Congress



Sarah Elfreth
Member of Congress



Lauren Underwood
Member of Congress



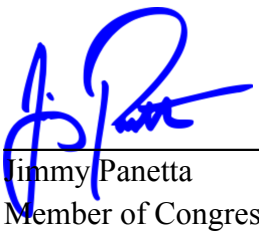
Jason Crow
Member of Congress



Lois Frankel
Member of Congress



Madeleine Dean
Member of Congress



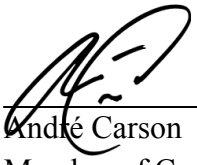
Jimmy Panetta
Member of Congress



Robert J. Menendez
Member of Congress



Melanie Stansbury
Member of Congress



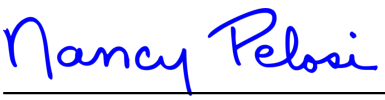
André Carson
Member of Congress



Dina Titus
Member of Congress



Chrissy Houlahan
Member of Congress



Nancy Pelosi
Member of Congress



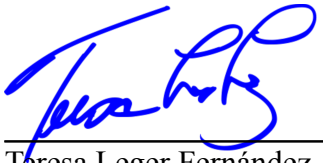
Debbie Dingell
Member of Congress



Darren Soto
Member of Congress



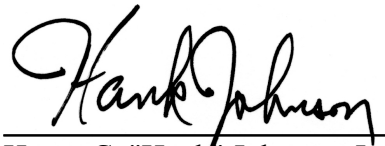
Chris Deluzio
Member of Congress



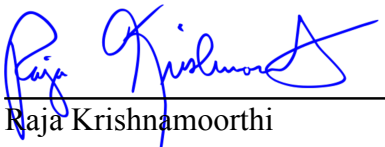
Teresa Leger Fernández
Member of Congress



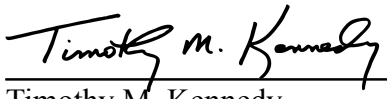
Herbert C. Conaway, Jr.
Member of Congress



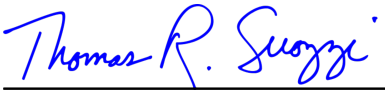
Henry C. "Hank" Johnson, Jr.
Member of Congress



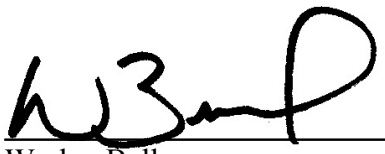
Raja Krishnamoorthi
Member of Congress



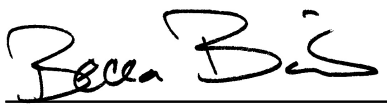
Timothy M. Kennedy
Member of Congress



Thomas R. Suozzi
Member of Congress



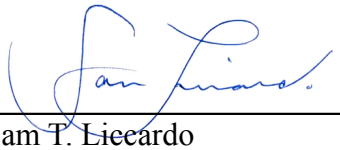
Wesley Bell
Member of Congress



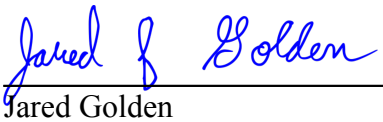
Becca Balint
Member of Congress



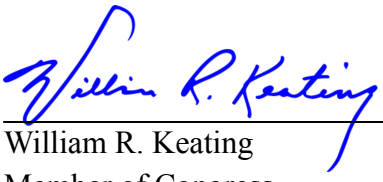
Everton Blair Jr.
Member of Congress



Sam T. Liccardo
Member of Congress



Jared Golden
Member of Congress



William R. Keating
Member of Congress



Marie Gluesenkamp Perez
Member of Congress



Veronica Escobar
Member of Congress



Ami Bera, M.D.
Member of Congress



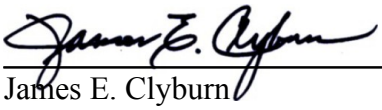
Maxwell Alejandro Frost
Member of Congress



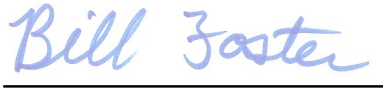
Ritchie Torres
Member of Congress



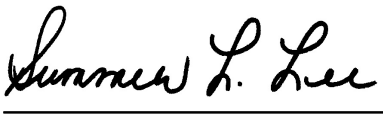
Ted W. Lieu
Member of Congress



James E. Clyburn
Member of Congress



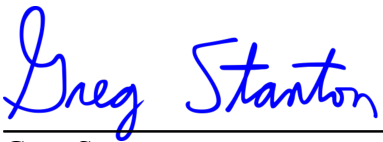
Bill Foster
Member of Congress



Summer L. Lee
Member of Congress



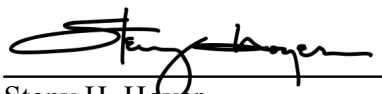
Laura Friedman
Member of Congress



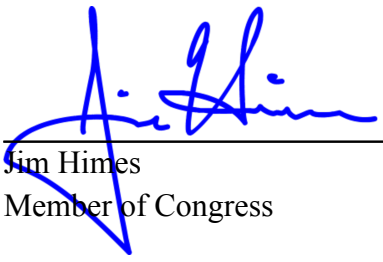
Greg Stanton
Member of Congress



Greg Casar
Member of Congress



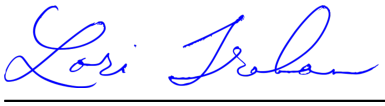
Steny H. Hoyer
Member of Congress



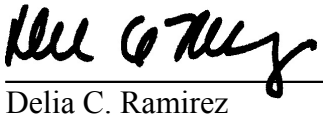
Jim Himes
Member of Congress



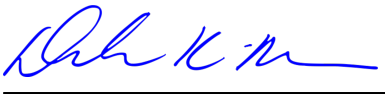
Kim Schrier, M.D.
Member of Congress



Lori Trahan
Member of Congress



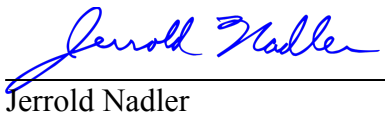
Delia C. Ramirez
Member of Congress



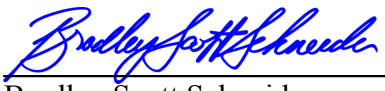
Deborah K. Ross
Member of Congress



Zoe Lofgren
Member of Congress



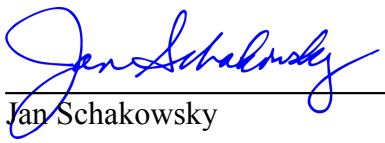
Jerrold Nadler
Member of Congress



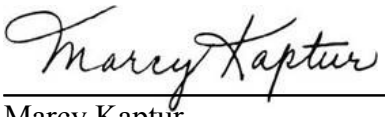
Bradley Scott Schneider
Member of Congress



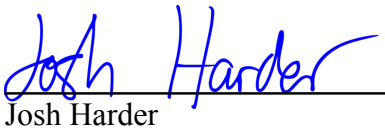
Chris Pappas
Member of Congress



Jan Schakowsky
Member of Congress



Marcy Kaptur
Member of Congress



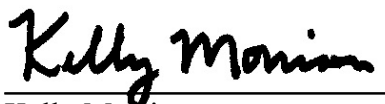
Josh Harder
Member of Congress



Jared Moskowitz
Member of Congress



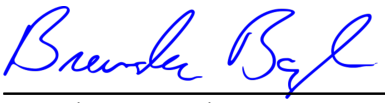
Raul Ruiz, M.D.
Member of Congress



Kelly Morrison
Member of Congress



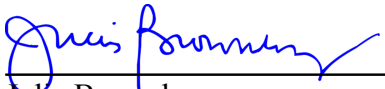
Pablo José Hernández
Member of Congress



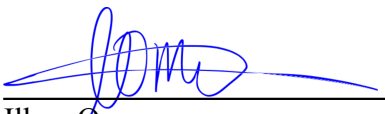
Brendan F. Boyle
Member of Congress



Frank J. Mrvan
Member of Congress



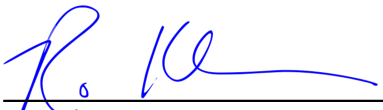
Julia Brownley
Member of Congress



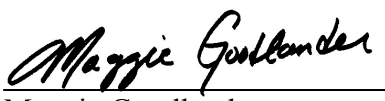
Ilhan Omar
Member of Congress



Frank Pallone, Jr.
Member of Congress



Ro Khanna
Member of Congress



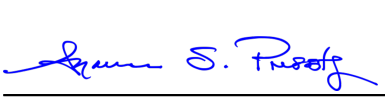
Maggie Goodlander
Member of Congress



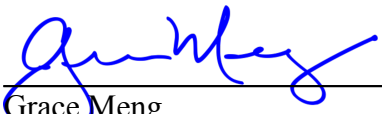
Mark Takano
Member of Congress



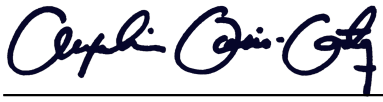
Jesús G. "Chuy" García
Member of Congress



Ayanna Pressley
Member of Congress



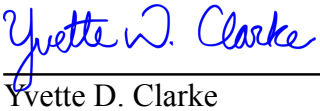
Grace Meng
Member of Congress



Alexandria Ocasio-Cortez
Member of Congress



Dan Goldman
Member of Congress



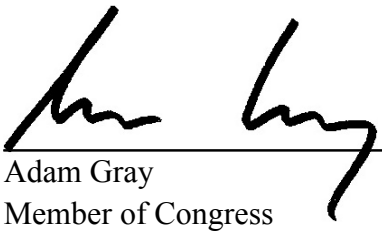
Yvette D. Clarke
Member of Congress



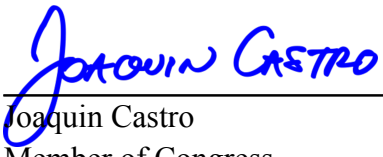
Josh Gottheimer
Member of Congress



Robin L. Kelly
Member of Congress



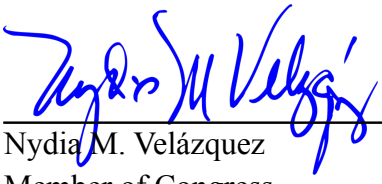
Adam Gray
Member of Congress



Joaquin Castro
Member of Congress



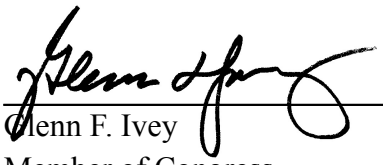
Gabe Amo
Member of Congress



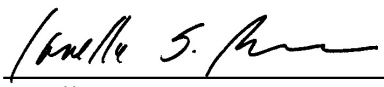
Nydia M. Velázquez
Member of Congress



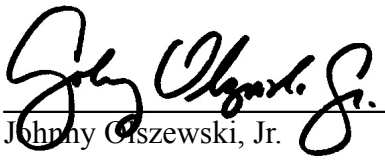
Valerie P. Foushee
Member of Congress



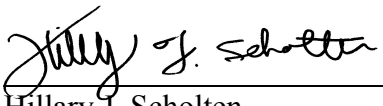
Glenn F. Ivey
Member of Congress



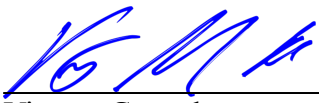
Janelle S. Bynum
Member of Congress



Johnny Olszewski, Jr.
Member of Congress



Hillary J. Scholten
Member of Congress



Vicente Gonzalez
Member of Congress



Mike Thompson
Member of Congress



Luz M. Rivas
Member of Congress



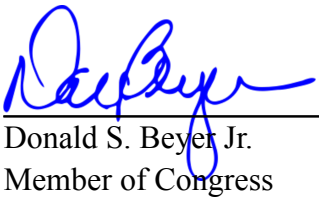
Emanuel Cleaver, II
Member of Congress



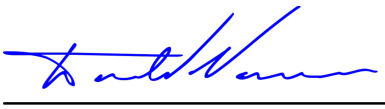
Ed Case
Member of Congress



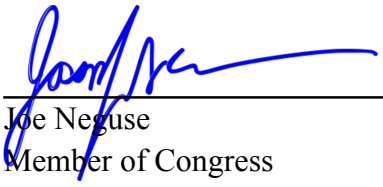
Al Green
Member of Congress



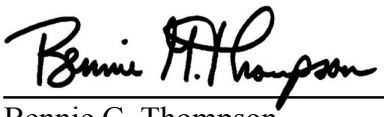
Donald S. Beyer Jr.
Member of Congress



Donald Norcross
Member of Congress



Joe Neguse
Member of Congress



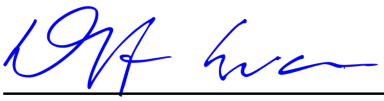
Bennie G. Thompson
Member of Congress



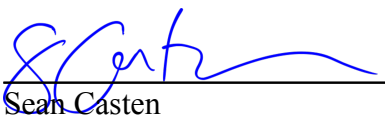
Adam Smith
Member of Congress



Nellie Pou
Member of Congress



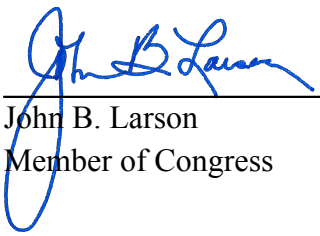
Dwight Evans
Member of Congress



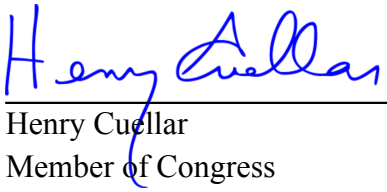
Sean Casten
Member of Congress



Susie Lee
Member of Congress



John B. Larson
Member of Congress



Henry Cuellar
Member of Congress



Emily Randall
Member of Congress



Maxine Dexter, M.D.
Member of Congress



Steve Cohen
Member of Congress



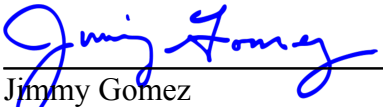
Stacey E. Plaskett
Member of Congress



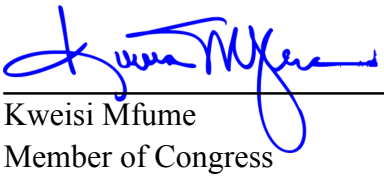
Emilia Strong Sykes
Member of Congress



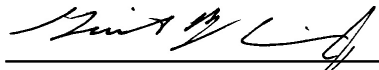
Scott H. Peters
Member of Congress



Jimmy Gomez
Member of Congress



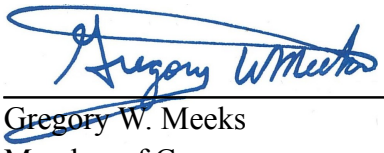
Kweisi Mfume
Member of Congress



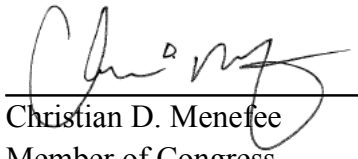
Gilbert Ray Cisneros, Jr.
Member of Congress



George Latimer
Member of Congress



Gregory W. Meeks
Member of Congress



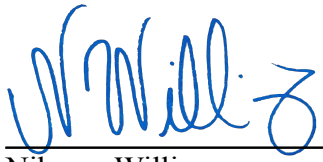
Christian D. Menefee
Member of Congress



Patrick Ryan
Member of Congress



Laura A. Gillen
Member of Congress



Nikema Williams
Member of Congress

Aisha Wahab
Member of Congress

Jake Auchincloss
Member of Congress

Lloyd Doggett
Member of Congress