April 14, 2020

Office of the Chief Statistician
Office of Management and Budget
725 17th Street NW
Washington, DC 20503


To the Office of the Chief Statistician:


MAZON is vehemently opposed to all of the alternate measures of poverty proposed by the Working Group. It is self-evident that using any of these would artificially depress the estimated number of Americans living at or below the poverty line. MAZON is extremely concerned that if OMB were to begin using the alternate measures of poverty proposed by the Working Group, the weaknesses in those alternate measures would result in a woefully inaccurate estimate of the number of Americans living in poverty.

Inspired by Jewish values and ideals, MAZON is a national advocacy organization working to end hunger among people of all faiths and backgrounds in the United States and Israel. For more than 30 years, MAZON has been committed to ensuring that vulnerable people have access to the resources they need to be able to put food on the table. MAZON is a leading voice throughout the country on anti-hunger issues, especially those that involve populations or problems that have been previously overlooked or ignored—this includes food insecurity among veterans, currently-serving military families, seniors, rural and Native American communities, and college
students. It is with this experience and focus that we address OMB’s request for comments.

The long-standing method used to make annual adjustments to the Official Poverty Measure (OPM) is the Consumer Price Index for All Urban Consumers (CPI-U). The current OMB proposal and Working Group report suggests using alternate measures, most of which would serve to lower the number of people considered to be living in poverty in America, despite objective evidence that poverty rates and rates of economic hardship are actually rising.

The request for comments asks “what income sources should be included”¹ in the potential new measure of poverty and the Working Group report notes that only “pre-tax money income”² is included in the current poverty measure. The additional in-kind benefits that the Working Group notes are not counted in the current measure of poverty include “SNAP, housing or school meal subsidies, public health insurance, [and] employer-provided health insurance contributions.”³ All but the last of these measures are means tested programs designed to help those already determined to be living in or near poverty and in need of assistance. It is counterintuitive and against the guiding principles and Congressional intent of these programs to count them as income to artificially reduce the number of Americans experiencing poverty.

Using the Supplemental Nutrition Assistance Program (SNAP) as an example illustrates that this type of benefit is not income and should not be counted as such. SNAP is the cornerstone of the federal nutrition safety net and the nation’s most effective anti-poverty program for reducing hunger. Households are ineligible for SNAP if their gross income exceeds an amount that is tied to the federal poverty guidelines. For example, for a household of four people, the current gross monthly income cannot exceed $2,720. Given that the average rental cost across the country for a 2-bedroom apartment is

³ Id.
$1,880 per month\textsuperscript{4}, and healthcare, childcare, and transportation costs are rising, it is ludicrous for a calculation done by the federal government to conclude that the small amount of monthly support provided to eligible families to purchase food is anywhere near enough to truly move them from at or below the poverty threshold to above it.

SNAP enrollment expands and contracts as need shifts, and many recipients only require assistance for a matter of months. If we let SNAP, and programs like it, work as they are intended, data shows that they will serve as a lifeline to temporarily assist those who need help during hard times. Making any changes to the way the OMB measures poverty will have ripple effects throughout the federal government — a consequence ignored by this request for comment. If we incorporate these programs into income measures, it will fundamentally change how these successful programs are structured and disincentivize use for the very people the programs are designed to support.

MAZON’s decades of advocacy on behalf of vulnerable populations has given us the expertise to know that households already facing unique barriers to accessing food would be most adversely affected by any effort to change the poverty measure to statistically, but not actually, reduce the number of Americans who are living in poverty. Nearly 1.4 million veterans live in households that receive vital SNAP benefits. Almost one-quarter of Native Americans participate in the SNAP program. And nearly 40% of community college students experience food insecurity. These already at-risk populations need SNAP, and other food assistance programs such as the Supplemental Nutrition Program for Women, Infants, and Children (WIC) and free and reduced-price meal programs for children and adults.

To continue this ill-considered effort in the midst of a global pandemic that is worsening the living conditions for those already living in poverty and catapulting millions of Americans into poverty for the first time is unconscionable, especially considering that other federal agencies have extended the comment periods for their

proposed regulatory changes. As of April 14, OMB has failed to withdraw this request for comment or extend the comment period, guaranteeing that the organizations best equipped to respond to the Working Group’s questions will be unable to do so due to their need to refocus their efforts on the current crisis.

Denying benefits to Americans in need by making the poverty line a less accurate reflection of their circumstances is contrary to Congressional intent and the national interest, and it is certainly contrary to the values and ideals on which our country was founded. Our government cannot effectively provide for the wellbeing of its citizens if we use inaccurate measures to determine who is most in need. The way to combat poverty in this country is to care for and lift up the most vulnerable among us — not to merely shift the metrics to obscure the scope of the problem. OMB must not proceed with any proposed changes to the way poverty is measured that reduce the number of people living in poverty.

Sincerely,

Abby J. Leibman
President and CEO
MAZON: A Jewish Response to Hunger

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