June 21, 2019

VIA ELECTRONIC MAIL

Nancy Potok Chief Statistician Office of Management and Budget Statistical Directives@omb.eop.gov

Re: OMB-

guidelines like the federal poverty level,² which is used to determine financial eligibility for numerous federal, state, and local programs. Our clients do not earn enough money to purchase

Specifically, certain proposed alternatives to the current CPI-U inflation measure that use a chained index will materially reduce the annual rate of increase of the Official Poverty Measure, artificially pushing thousands of low-income people "over" the federal poverty level (or percentage multiples of the federal poverty level) and therefore disqualifying them from indispensable healthcare and public services, such as Medicaid, SNAP, Head Start, free and reduced lunch assistance, and legal services assistance—services the SPLC fights to protect every day on behalf of the communities we serve.

172,000 low-

satisfy their debt through alternatives to payment, like community service, while those found able but unwilling to pay face jail time.³⁴ A determination of indigency can also relieve defendants from being charged with violation of probation or parole for failure to pay supervision fees.³⁵

A resident of Alabama, who works full time and currently receives SNAP benefits, is concerned that this proposed change will have a major impact on their community in that many who live there will go without adequate nutrition. According to him, receiving public assistance has allowed him to eat when he would have otherwise starved.

Impact on immigrant families:

Sincerely,

Arienne Jones <u>arienne.jones@splcenter.org</u> Katherine Dunn