[Date]

Certification Policy Branch
SNAP Program Development Division
Food and Nutrition Service, USDA
3101 Park Center Drive
Alexandria, Virginia 22302

RE: Proposed Rule: Supplemental Nutrition Assistance Program (SNAP): Requirements for Able-Bodied Adults without Dependents RIN 0584-AE57

Dear Certification Policy Branch:

Thank you for the opportunity to comment on USDA’s Proposed Rulemaking on SNAP requirements and services for Able-Bodied Adults Without Dependents (ABAWDs). [I/we] strongly oppose the proposed changes, as they would cause serious harm to [fill in population group or sector], our community and the nation.

[FILL IN INFORMATION ABOUT YOUR ORGANIZATION]. XYZ organization is a \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ organization based in \_\_\_\_\_\_\_\_\_\_. Our mission is to \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_.

SNAP (CalFresh in California) plays a critical role in addressing hunger and food insecurity in insert name of your city/county/community], California, and is the first line of defense against hunger for the majority of our low-income residents. We feel particularly strongly about the three-month time limit because by September 2019, six counties in our state will have had to re-implement this mean-spirited, counterproductive, and administratively complex rule. The reimposition of the time limit will potentially cut off vital food assistance to tens of thousands of our state’s most vulnerable people just because they are unable to find and consistently maintain a reliable 20 hour per week job. [PLEASE ADD ANYTHING about your experience or observations about the rule, or hunger in your community’s adult, non-senior, non-disabled population. Consider adding a link to a newspaper article, a client story or just the community impact when so many are without food assistance.]

Since 1996, federal law has limited SNAP eligibility for childless unemployed and underemployed adults age 18-49 (except for those who are able to provide verification of an exemption) to just three months out of every three years unless they are able to obtain, maintain, and provide proof of an average of 20 hours a week of employment. This rule is overly harsh, unfair, and does nothing to enhance a SNAP participant’s skills or ability to find meaningful employment. It doesn’t measure an individual’s willingness to work, only whether they are fortunate enough to find and keep a job at over 20 hours per week, regardless of how little control they have over their hours. Further, the law is counterproductive. Time limits harm vulnerable people by denying them essential food benefits at a time when they most need it. This does nothing to increase employment and earnings; rather, it punishes people who are trying to get back on their feet.

Under the law, states have the flexibility to waive certain areas that have insufficient jobs for the population. These rules have been in place for nearly 20 years and every state except Delaware has availed themselves of waivers at some point since the time limit became law. Use of waivers increased, as intended, during the Great Recession, and have now returned to their historic norms as the economy has improved in many areas of the country. However, the stronger economy has not impacted everyone equally. California’s economy is only now recovering from the severe downturn, and many areas continue to have persistently high unemployment. Those jobs that do exist often offer low wages, irregular hours, and may require skills that are not an appropriate match for the population impacted by the time limit. Existing waiver rules allow states to tailor their SNAP programs to suit the needs of their citizens. The rules are reasonable, transparent and manageable for states to operationalize. Any change that would restrict, impede or add uncertainty to California’s current ability to waive areas with elevated unemployment must not be pursued.

There is simply no justification for weakening current waiver rules and exposing more vulnerable people to SNAP time limits. Agriculture Secretary Sonny Perdue suggests these changes will, “encourage participants to take proactive steps toward self-sufficiency,” but the proposal provides little analysis to explain how imposing time limits will help ABAWDs secure meaningful employment. Despite some recent progress within specific grant-funded local programs, the underfunded workforce system and SNAP Employment and Training programs are not designed to meet the level of service this rule would require. Further, the proposal to base waiver eligibility solely on unemployment rates ignores the many barriers to employment that aren’t captured by that measure. These barriers include chronic illness that doesn’t meet disability guidelines, homelessness and addiction, or lack of access to child care, transportation and educational opportunities. [This would have a negative impact in our state. Describe any areas in the state that might have unemployment rates under 7 percent but still lack sufficient jobs or opportunities to build skills; note any challenges –such as lack of transportation or a lack of education -- these individuals have in finding work.]

The Department provides cost estimates for the reduction in federal expenditures to result from this rule change, but ignores the economic ripple effect that would have. This rule is estimated to reduce SNAP benefit payments by about $1.7 billion per year. According to USDA Economic Research Service, each $1 in federal SNAP benefits generates $1.79 in economic activity. Therefore, a $1.7 billion reduction of SNAP dollars would mean a loss of $3 billion in economic activity for that year. The Department also fails to calculate the health costs of cutting 755,000 low-income Americans off food benefits. As SNAP supports better diets, it leads to better health outcomes and lower medical costs for participants. However, with broader application of the time limit more people will be at risk for increased incidence of chronic, preventable diseases, harmful stress and higher health care costs. Further, by time limiting food assistance to this group, federal law has shifted the burden of providing food to these unemployed individuals from SNAP to local charity. That is a burden that state and local groups cannot possibly meet, given that 19 out of every 20 emergency meals are provided by the federal nutrition programs. [Add any examples or details about how the loss of benefits for ABAWDs would affect California, or a certain region/city.]

Hunger is in itself a barrier to employment. While SNAP helps people put food on the table; it also lessens the financial burden of having to buy food each month, the resulting reduction in financial stress helps people focus on moving forward, rather than just staying afloat. When people can afford nutritious food they are better prepared to learn and develop the skills necessary to get higher paying jobs. Instead of limiting the resources available to people with ABAWD status, the Department would do more to support “self-sufficiency” by ensuring no American ever goes hungry.

The Administration’s proposed rule seeks to end run Congress, which just concluded a review and reauthorization of SNAP in the 2018 Farm Bill and did not make the changes proposed. The only action we encourage USDA to take with respect to this ABAWD time limit rule is to propose its long overdue elimination. Restoring the ability of SNAP/CalFresh to provide food assistance to impoverished unemployed people would be a powerful policy improvement that would reduce food insecurity among those seeking work and support positive health and economic outcomes for SNAP/CalFresh beneficiaries.

Sincerely,

Name, title, org