



Friends Committee on
National Legislation

A Quaker Lobby in the Public Interest

April 9, 2018

Ms. Sasha Gersten-Paal
SNAP Program Development Division
Food and Nutrition Service
3101 Park Center Drive
Room 812
Alexandria, VA 22302

Re: Advanced Notice of Proposed Rulemaking: Supplemental Nutrition Assistance Program: Requirements and Services for Able-Bodied Adults Without Dependents RIN 0584–AE57

Dear Ms. Gersten-Paal:

The Friends Committee on National Legislation (FCNL) is a non-partisan, faith-based organization that lobbies Congress and the administration to advance peace, justice, opportunity, and environmental stewardship. Founded in 1943 by members of the Religious Society of Friends (Quakers), FCNL works with a grassroots network of tens of thousands of people across the country to advance policies and priorities that promote peace and justice. FCNL seeks to live our values of integrity, simplicity, and peace as we build relationships across political divides to move policies forward.

FCNL offers the following comments on USDA's Advanced Notice on requirements and services for Able-Bodied Adults Without Dependents (ABAWDs).

The Supplemental Nutrition Assistance Program (SNAP) plays a critical role in addressing hunger and food insecurity. It is crucial in helping people live with dignity, support their families, and move out of poverty. SNAP offers a lifeline to struggling families, helping millions of people stave off hunger each year.

We are particularly concerned about any efforts to further restrict SNAP's already harsh three-month time limit for able bodied adults without dependents.

Federal law limits SNAP eligibility for childless unemployed and underemployed adults age 18-50 (except for those who are exempt) to just three months out of every three years unless they are able to obtain and maintain an average of 20 hours a week of employment. This rule is already too harsh. It harms vulnerable people by denying them food benefits at a time when

many need it most. Studies show that mandatory work requirements do not result in increased employment or earnings¹. Many who receive SNAP benefits are already working, and those who don't shouldn't be expected to work because they are children, seniors, and/or have a disability. Harsher work requirements would cause many people who are already working to lose benefits due to temporary or inconsistent employment. Moreover, it would likely prevent many people from receiving benefits who have disabilities that are undiagnosed or don't technically qualify for exemption. After the Great Recession, at least 500,000 low-income individuals nationwide lost SNAP in 2016 due to the time limit going back into effect, putting food security at risk for struggling individuals and families across the country.

Addressing hunger requires a strong partnership between churches, private charities and the government. We cannot end hunger through faith-based, private charity alone. Nor are churches and charities in a position to serve the onslaught of people in the event that they lose their SNAP benefits because they cannot fulfill new bureaucratic requirements.

While this request for comment appears to be open to suggestions on how to make the time limit less harsh via administrative action, we are concerned that the administration seeks only to make the rule more draconian. The administration's budget has proposed making the time limit harsher by repealing states' flexibility to exempt certain individuals and many high unemployment areas from the time limit and exposing more people to this punitive policy. As a result, we are deeply concerned that this request for comment is part of an administrative effort to make the time limit even harsher.

We strongly oppose any administrative action by USDA that would expose more people to this cutoff policy. Under the law, states have the flexibility to waive areas within the state that have experienced elevated unemployment. It is unfair to force people off of SNAP because they cannot get work in an environment that has no jobs. The rules governing areas' eligibility for waivers 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. During the Great Recession, SNAP played a crucial role in preventing hunger. While we saw poverty and unemployment rates rise significantly, the food insecurity rate held relatively constant after an initial spike. As designed, the program expanded due to greater need, and has since been shrinking in response to a reviving economy. The waivers were instrumental in allowing the program to properly expand and retract in order to meet the increased need for benefits. The waiver rules are reasonable, transparent, and manageable for states to operationalize. Any change that would restrict, impede, or add uncertainty to state's current ability to waive areas with elevated unemployment must not be pursued.

The request for comment also seems to suggest that potential improvements to other aspects of the time limit policy, such as individual exemption policy, would justify weakening states' flexibility to waive the time limit in areas with elevated unemployment. This logic is unfounded.

¹ <https://www.cbpp.org/research/poverty-and-inequality/work-requirements-dont-cut-poverty-evidence-shows>

Each state's current ability to exempt certain individuals from the rule is important, but is wholly insufficient and could never make up for having to apply the time limit in areas with elevated unemployment. And, the underfunded workforce system and SNAP employment and training programs are not designed or well suited to meet the job training requirements under this rule. SNAP is an anti-hunger program. It is not intended to be a jobs program. Put simply, there is no justification for weakening current waiver rules and exposing more vulnerable people to this SNAP eligibility cutoff.

Our government has a moral duty to help those who are in need of assistance and provide people with the resources to live with dignity and provide for their families. SNAP is an incredibly effective and efficient anti-hunger program. Rather than punishing people for being unemployed or underemployed by preventing them from accessing nutrition assistance, we should be investing in those areas shown to truly help people enter the workforce, create jobs, and raise wages. Robust investment in education, skills development and training programs, affordable childcare, and public transportation would be far more effective in moving this country towards a society where everyone can fully live out their potential.

Sincerely,

The Friends Committee on National Legislation