



April 2, 2019

Ms. Sasha Gersten-Paal
Certification Policy Branch
Program Development Division
Food and Nutrition Service
3101 Park Center Drive
Alexandria, Virginia 22302

Re: Supplemental Nutrition Assistance Program: Requirements and Services for Able-Bodied Adults Without Dependents (ABAWDs) (RIN: 0584-AE57)

Dear Ms. Gersten-Paal,

Thank you for the opportunity to comment on USDA's Advanced Notice of Proposed Rulemaking (ANPRM) on requirements for Able-Bodied Adults Without Dependents (ABAWDs). ChangeLab Solutions believes that the proposed rule would result in a negative effect on individuals, communities, and local economies. **It would compound detrimental effects on populations already experiencing health disparities and negatively impact the economic health and future of cities, states, and the United States.** We urge that the rule be withdrawn in its entirety.

ChangeLab Solutions works across the nation to advance equitable laws and policies that ensure healthy lives for all. We prioritize communities whose residents are at highest risk for poor health and focus on undoing the harms of structural racism and other forms of institutionalized discrimination that burden underserved communities. Our unique approach, backed by decades of solid research and proven results, leverages our policy and legal experience to create evidence-based practices and policies that advance positive change.

Access to nutritious, affordable food is a basic health need and a critical determinant of health. SNAP embodies these principles—and it works. SNAP is currently able to respond quickly and effectively to the specific and changing needs in states, including economic downturns and disasters. It can accommodate the reality and variety of familial responsibilities; recipients are often responsible for the care of relatives, parents, children, or other individuals who are not in their custody or not defined as dependents.¹

The proposed rule would tighten existing work requirements on SNAP by limiting the ability of states to apply for waivers for areas that have high rates of unemployment or a surplus of labor. In the proposed rule, the USDA estimates that approximately 755,000 SNAP participants would lose their eligibility in fiscal year 2020.² The intent of the rule is to increase “self-sufficiency, well-being, and economic mobility”;³ however, **the proposed rule is founded on incorrect assumptions about people in poverty, access to sustainable employment, and the efficacy of work requirements. The proposed rule would compound detrimental effects on populations that are already experiencing health disparities. Lastly, the proposed rule would hurt the economy by rolling back positive changes produced by current SNAP requirements.**

1) The proposed rule is founded on incorrect assumptions about people in poverty, access to sustainable employment, and the efficacy of work requirements.

Work requirement policies assume that all individuals have equal opportunity to find safe, sustainable, and valuable employment. Research shows that this is not the case.^{4,5,6} For example, the African American unemployment rate is roughly double the non-Hispanic white unemployment rate.^{7,8} Data show that white applicants are much more likely to receive callbacks after job applications or interviews than equally qualified Black applicants.⁹ Other populations with difficulty in the labor markets are adults with a high school education or less and people living in rural areas where jobs are often hard to find.¹⁰

On top of the aforementioned challenges to gaining employment, SNAP recipients subject to work requirements are often forced to take any low-wage work available making them more likely to have jobs with irregular and unpredictable work schedules, high turnover, and few or no benefits.^{11,12} Although unemployment rates may be falling,¹³ there are many reasons why the jobs available might not be accessible or appropriate for many individuals.

Work requirements on public assistance programs have been rigorously studied—and they don't work. Studies demonstrate that receiving SNAP benefits does not discourage people from working, and a large majority of recipients worked in the year before or after enrollment.^{14,15} An analysis of 13 random assignment studies examining the impacts of programs that focus on mandatory work found that among recipients who were subject to work requirements, employment increases were modest and faded over time, few were able to find stable employment, most with barriers to employment never found employment even after participating in work programs, and the majority remained poor and some became poorer.¹⁶

2) The proposed rule would compound detrimental effects on populations that are already experiencing health disparities.

SNAP currently helps lift millions of people out of poverty, but this effect is especially pronounced in Black and Latino populations, which have higher rates of poverty, food insecurity, and diet-related diseases than the overall U.S. population.^{17,18} About 1 in 5 Black adults live below the poverty line, compared with 1 in 8 in the general population, and 23% of the Black population experiences food insecurity, compared with 12% of the overall U.S. population.¹⁹ Similarly, 1 in 5 Latino adults live below the poverty line and 19% of the Latino population experiences food insecurity.²⁰ Additionally, Black adults have higher rates of heart disease, stroke, and diabetes²¹ than the general population while Latinos have higher rates of diabetes and liver disease²² than the overall U.S. population.

Losing access to food benefits like SNAP is a de facto loss of income, given that income dedicated to other needs must shift to cover food costs—and this loss of income directly impacts access to health care. Further, it diverts resources that allow families to live in safer homes and neighborhoods, buy healthier food, have more time for physical activity, and generally experience less stress from trying to make ends meet.²³ Additionally, food insecurity contributes to its own set of health problems, including increased rates of diabetes, heart disease, and mental health issues.²⁴ For Black and Latino populations, this effect is compounded because they already carry a higher burden of diet-related diseases, as mentioned earlier.

3) The proposed rule would hurt the economy by rolling back positive changes produced by current SNAP requirements.

SNAP participation has a positive impact on local economies and agriculture. When SNAP recipients spend their benefits, it leads to increased economic activity by producers of the purchased goods and services, as well as the retail, wholesale, and transportation systems that make these goods and services available. Every \$5 in new SNAP benefits can generate as much as \$9 of economic activity, stimulate agricultural production, and generate agricultural jobs.²⁵ A recent estimate finds that every \$1 billion spent by SNAP recipients supports 12,748 jobs.²⁶

Given its significant boost to the economy, cutting SNAP benefits would have a negative economic impact. The proposed rule is estimated to cut SNAP by \$15 billion over the next 10 years by taking away benefits.²⁷ It is estimated that this loss in benefits to recipients would shrink U.S. GDP by about \$18.3 billion.²⁸ In addition, about 18,900 jobs would be lost in 2020 alone and more than 178,000 job-years would be lost over the next decade.²⁹

SNAP's boost to the economy is particularly important during times of economic distress. During a recession, SNAP becomes important not only for the millions of Americans who become eligible to receive SNAP benefits but also because it serves as an economic stabilizer. During the Great Recession, when the unemployment rate was nearing 9%, each additional \$1 in SNAP benefits boosted GDP by \$1.74.³⁰

In sum, reducing the number of Americans eligible for SNAP would compound effects on populations experiencing health disparities, keep more Americans in poverty, and hurt the economy.

For all the reasons stated, the Department of Homeland Security should withdraw the proposed rule. If enacted, the rule would be detrimental for communities and the economy.

Thank you for the opportunity to submit comments on the proposed rulemaking. Please do not hesitate to contact me to provide further information.

Sincerely,



Nadia Rojas, MPH
Policy Analyst
ChangeLab Solutions
2201 Broadway, Suite 502
Oakland, CA 94612
510.302.3886
nrojas@changelabsolutions.org



Nessia Berner Wong, MPH
Senior Policy Analyst
ChangeLab Solutions
2201 Broadway, Suite 502
Oakland, CA 94612
510.281.5632
nbernerwong@changelabsolutions.org

-
- ¹ Ohio Association of Foodbanks. *2015 Work Experience Program Report*. <http://ohiofoodbanks.org/web/WEP-2013-2015-report.pdf>. Published in 2015. Accessed April 5, 2018.
- ² Supplemental Nutrition Assistance Program: Requirements and Services for Able-Bodied Adults without Dependents. Federal Register Website. <https://www.federalregister.gov/documents/2019/02/01/2018-28059/supplemental-nutrition-assistance-program-requirements-for-able-bodied-adults-without-dependents>.
- ³ Supplemental Nutrition Assistance Program: Requirements and Services for Able-Bodied Adults without Dependents. Federal Register Website. <https://www.federalregister.gov/documents/2019/02/01/2018-28059/supplemental-nutrition-assistance-program-requirements-for-able-bodied-adults-without-dependents>.
- ⁴ Hammond A, Speer M. SNAP's Time Limit: Emerging Issues in Litigation and Implementation. *ClearingHouse Community: Part of the Sargent Shriver National Center on Poverty Law*. 2017. <https://www.povertylaw.org/clearinghouse/article/timelimit>.
- ⁵ Bolen E, Dean S. *Waivers Add Key State Flexibility to SNAP's Three-Month Time Limit*. Center for Budget and Policy Priorities. February 6, 2018. <https://www.cbpp.org/research/food-assistance/waivers-add-key-state-flexibility-to-snaps-three-month-time-limit>.
- ⁶ Carlson S, Rosenbaum D, Keith-Jennings B. *Who Are the Low-Income Childless Adults Facing the Loss of SNAP in 2016?* Center for Budget and Policy Priorities. February 8, 2016. <https://www.cbpp.org/research/food-assistance/who-are-the-low-income-childless-adults-facing-the-loss-of-snap-in-2016>.
- ⁷ Jones J. In 14 states and DC, the African American unemployment rate is at least twice the white unemployment rate. *Economic Policy Institute*. May 17, 2018. <https://www.epi.org/publication/state-race-unemployment-2018q1/>.
- ⁸ Bureau of Labor Statistics. Labor Force Statistics from the Current Population. Updated January 4, 2019. https://www.bls.gov/web/empsit/cpsee_e16.htm.
- ⁹ Quinlan C. Trump administration's proposed cuts to SNAP benefits will 'take food off of people's plates.' *ThinkProgress*. February 1, 2019. <https://thinkprogress.org/trump-food-assistance-snap-cuts-d1eed47d412a/>.
- ¹⁰ Quinlan C. Trump administration's proposed cuts to SNAP benefits will 'take food off of people's plates.' *ThinkProgress*. February 1, 2019. <https://thinkprogress.org/trump-food-assistance-snap-cuts-d1eed47d412a/>.
- ¹¹ Bolen E, Dean S. *Waivers Add Key State Flexibility to SNAP's Three-Month Time Limit*. Center for Budget and Policy Priorities. February 6, 2018. <https://www.cbpp.org/research/food-assistance/waivers-add-key-state-flexibility-to-snaps-three-month-time-limit>.
- ¹² Carlson S, Rosenbaum D, Keith-Jennings B. *Who Are the Low-Income Childless Adults Facing the Loss of SNAP in 2016?* Center for Budget and Policy Priorities. February 8, 2016. <https://www.cbpp.org/research/food-assistance/who-are-the-low-income-childless-adults-facing-the-loss-of-snap-in-2016>.
- ¹³ Bureau of Labor Statistics. Databases, Tables & Calculators by Subject. United States Department of Labor. 2019. <https://data.bls.gov/timeseries/lms14000000>.
- ¹⁴ Schultz E, Ravi A, Vallas R. Work Requirement Proposals Would Kick Struggling Workers When They're Down. *Center for American Progress*. November 2, 2017. <https://www.americanprogress.org/issues/poverty/reports/2017/11/02/442052/work-requirement-proposals-kick-struggling-workers-theyre/>.
- ¹⁵ Rosenbaum D. *The Relationship Between SNAP and Work Among Low-Income Households*. Center for Budget and Policy Priorities. January 20, 2013. <https://www.cbpp.org/research/the-relationship-between-snap-and-work-among-low-income-households>.
- ¹⁶ Grogger J, Karoly L. *Welfare Reform: Effects of a Decade of Change*. Harvard University Press; 2005.
- ¹⁷ Center on Budget and Policy Priorities. SNAP Helps Millions of African Americans. Updated February 26, 2018. <https://www.cbpp.org/research/food-assistance/snap-helps-millions-of-african-americans>.
- ¹⁸ Center on Budget and Policy Priorities. SNAP Helps Millions of Latinos. Updated February 26, 2018. <https://www.cbpp.org/research/food-assistance/snap-helps-millions-of-latinos>.
- ¹⁹ Center on Budget and Policy Priorities. SNAP Helps Millions of African Americans. Updated February 26, 2018. <https://www.cbpp.org/research/food-assistance/snap-helps-millions-of-african-americans>.
- ²⁰ Center on Budget and Policy Priorities. SNAP Helps Millions of Latinos. Updated February 26, 2018. <https://www.cbpp.org/research/food-assistance/snap-helps-millions-of-latinos>.

-
- ²¹ U.S. Department of Health and Human Services. Profile: Black/African Americans. <https://minorityhealth.hhs.gov/omh/browse.aspx?lvl=3&lvlid=61>.
- ²² U.S. Department of Health and Human Services. Profile: Hispanic/Latino Americans. <https://minorityhealth.hhs.gov/omh/browse.aspx?lvl=3&lvlid=64>.
- ²³ Dean S. *President's Budget Would Shift Substantial Costs to States and Cut Food Assistance for Millions*. Center for Budget and Policy Priorities; 2017. <https://www.cbpp.org/research/food-assistance/presidents-budget-would-shift-substantial-costs-to-states-and-cut-food>.
- ²⁴ Hartline-Grafton H. *The Impact of Poverty, Food Insecurity, and Poor Nutrition on Health and Well-Being*. Food Research & Action Center; 2017. <http://frac.org/wp-content/uploads/hunger-health-impact-poverty-food-insecurity-health-well-being.pdf>.
- ²⁵ USDA Economic Research Service. Supplemental Nutrition Assistance Program (SNAP) Linkages with the General Economy. <https://www.ers.usda.gov/topics/food-nutrition-assistance/supplemental-nutrition-assistance-program-snap/economic-linkages/>.
- ²⁶ West R, Vallas R. Trump's Effort to Cut SNAP by Fiat Would Kill 178,000 Jobs Over the Next Decade. *Center for American Progress*. March 14, 2019. <https://www.americanprogress.org/issues/poverty/news/2019/03/14/466700/trumps-effort-cut-snap-fiat-kill-178000-jobs-next-decade/>.
- ²⁷ Supplemental Nutrition Assistance Program: Requirements and Services for Able-Bodied Adults without Dependents. Federal Register Website. <https://www.federalregister.gov/documents/2019/02/01/2018-28059/supplemental-nutrition-assistance-program-requirements-for-able-bodied-adults-without-dependents>.
- ²⁸ West R, Vallas R. Trump's Effort to Cut SNAP by Fiat Would Kill 178,000 Jobs Over the Next Decade. *Center for American Progress*. March 14, 2019. <https://www.americanprogress.org/issues/poverty/news/2019/03/14/466700/trumps-effort-cut-snap-fiat-kill-178000-jobs-next-decade/>.
- ²⁹ West R, Vallas R. Trump's Effort to Cut SNAP by Fiat Would Kill 178,000 Jobs Over the Next Decade. *Center for American Progress*. March 14, 2019. <https://www.americanprogress.org/issues/poverty/news/2019/03/14/466700/trumps-effort-cut-snap-fiat-kill-178000-jobs-next-decade/>.
- ³⁰ West R, Vallas R. Trump's Effort to Cut SNAP by Fiat Would Kill 178,000 Jobs Over the Next Decade. *Center for American Progress*. March 14, 2019. <https://www.americanprogress.org/issues/poverty/news/2019/03/14/466700/trumps-effort-cut-snap-fiat-kill-178000-jobs-next-decade/>.