



March 25, 2019

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

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

Dear Certification Policy Branch:

The National Association of Social Workers (NASW) opposes the United States Department of Agriculture's (USDA) proposed rule for the Supplemental Nutrition Assistance Program (SNAP) which will limit the length of time that Able-Bodied Adults Without Dependents (ABAWDs) can receive SNAP benefits. The proposed changes would seriously compromise the health and well-being of millions of unemployed or underemployed adults, especially those who are marginalized and live on the edges of our society.

NASW is the country's largest social work organization with 110,000 members and 55 chapters. NASW member social workers know from their extensive frontlines experience that SNAP benefits are crucial to the health and stability of millions of individuals and families.

NASW is particularly troubled by the provisions of the proposed rule that will minimize states' flexibility seek to modify work requirement policies for SNAP eligibility. This will substantially increase nutrition insecurity. Further:

- People living in communities with high rates of unemployment will be disproportionately affected;
- Individuals who lack work skills, have limited vocational skills, limited educational attainment, will likely be ineligible for SNAP;
- Individuals from marginal populations, such as young adults transitioning from foster care – many of whom are not work ready- will also be disproportionately affected;
- Criminal justice-involved men and women, who face major barriers to being hired due to their criminal record will assuredly become ineligible for SNAP;
- Marginalized homeless men and women who often face high unemployment will be ineligible for SNAP; and

- People of color would be at particular risk of not being able to meet work requirement guidelines, given their much higher unemployment rates and persistent and racial discrimination in labor markets. The unemployment rate for African-Americans has long been roughly double the non-Hispanic white unemployment rate.

For all these vulnerable populations, SNAP is often the only source of nutritional food on a day-to-day basis.

Proposed Rule Reduces SNAP Benefits and Harms Communities

Under current SNAP rules¹ implemented in 1996, ABAWDs between the ages of 18 and 49 are required to work at least 20 hours a week or participate in a qualified job-training or volunteer program in order to be eligible for more than three months of SNAP benefits over a three-year period.

Benefits are discontinued after three months if the work requirements are not met and the applicant has not received a waiver. These work requirements are onerous for people living on the margins. For example, employment and earnings outcomes for youth through their mid-twenties who age out of foster care² are likely to have low rates of employment persist through age 24 and have difficulties in connecting to a work environment.

Perhaps the population that is most at-risk of the impact of the proposed work requirement rule are individuals who have a history of incarceration. Research shows that the unemployment rate among formerly incarcerated people is approximately 27%³. The administration's requirement that states impose work requirements to receive federal SNAP funds exacerbates food insecurities for these individuals mostly young men of color- who already face nearly insurmountable barriers in achieving rehabilitation.

At present, USDA has mechanisms that give states the latitude to request waivers⁴ to modify the work requirement policy, especially in circumstances where there is high unemployment or there are significant barriers to obtaining employment. The USDA work requirement waiver criteria designate that geographical areas within a given state that have 10 percent or higher unemployment rates or-based on other economic indicators have "insufficient jobs"⁵, will be eligible for receiving waivers. While the recently passed 2018 Farm Bill⁶ modified the number of exemptions that states can receive each year from 15 percent to 12 percent, it left intact other important flexible waiver rules.

What is worrisome to NASW and many other economic justice advocates is that the administration's proposed ABAWD rules change pointedly target low-income single adults by proposing to drastically curtail the work requirement waivers USDA will approve in the near future. In addition, the revised USDA work requirement rule would undermine an efficient state system that allowed for reasonable analyses of the true ability for individuals to obtain employment. Further exacerbating the harm done by the proposed rule change is USDA's plan to end states' ability to use exemptions accumulated prior to the

¹ [U.S. Department of Agriculture. Supplemental Nutrition Assistance Program \(SNAP\)](#)

² [Dept. of Health and Human Services. Coming of Age: Employment outcomes of youth aging out of foster care through their middle twenties.](#)
³ [Prison Policy Initiative. Out of Prison & Out of Work: July 2018](#)

⁴ [Center for Budget and Policy Priorities. Waivers Add Key State Flexibility to SNAP's Three-Month Time Limit](#)

⁵ [Center for Budget and Policy Priorities. Waivers Add Key State Flexibility to SNAP's Three-Month Time Limit](#)

⁶ [Forbes. Trump Signs 2018 Farm Bill as USDA Aims to Increase SNAP Work Requirements. December 2018](#)

rule's implementation --as well limit the amount of time states will have to use exemptions, they were to receive in the future⁷.

The impact of the administration's proposed work requirement rule change is significant. For example, many indigent individuals will be exposed to the arbitrary food cutoff and food insecurity almost immediately. By the administration's own calculations, the proposed rule would take food away from 755,000 low-income Americans, cutting food benefits by \$15 billion over 10 years⁸. The proposed rule would make it harder for areas with elevated unemployment rates to qualify for waivers of the time limit by adding a serve percent unemployment rate floor as a condition.

SNAP's Essential Benefits

It is important to make it clear that SNAP has been a successful program. SNAP benefits⁹ are essential to low-income America and the program has lived up to its promise by providing a social safety-net for its citizens. For example:

- SNAP reaches key vulnerable populations: 78 percent of SNAP households include a child, an elderly person, or a person with disabilities;
- While losing a job is the most common event causing a household to seek SNAP, 55 percent of SNAP households with children in 2015 worked and had earnings;
- SNAP lifted 3.6 million Americans out of poverty in 2016. SNAP is nearly as effective as the Earned Income Tax Credit in lifting families above the poverty line.
- SNAP relieves pressure on overwhelmed food banks, pantries, religious congregations, and other emergency food providers across the country. The program reinforces the need for comprehensive approaches to end hunger.

For the reasons stated above, NASW strongly opposes the USDA proposed work requirement rule change. We urge the administration to reconsider this unfair and harmful action. The health and well-being of many thousands of low-income men and women will be jeopardized if this arbitrary SNAP food cutoff policy goes into effect.

Sincerely,



Deputy Director, Programs

⁷ [Federal Register. Supplemental Nutrition Assistance Program: Requirements for Able-Bodied Adults Without Dependents](#)

⁸ [Hunger Free America. Action Alert: Stop the Trump Administration from taking food away from those in need!](#)

⁹ [Food Research & Action Center. Facts SNAP Strengths](#)