



March 26, 2019

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:

Project Bread respectfully submits the following comments in response to the proposed rule on Requirements for Able-Bodied Adults Without Dependents published on February 1, 2019. **We oppose the Department of Agriculture Proposed Rulemaking on SNAP requirements and services for Able-Bodied Adults Without Dependents.**

Project Bread is a state-wide anti-hunger organization in Massachusetts that is committed to preventing and ending hunger. We provide access to affordable, healthy, and reliable food for the 1 in 10 in our state who are food insecure. As a result, our organizational mission is deeply tied to the success of the Supplemental Nutrition Assistance Program (SNAP). Project Bread operates the FoodSource Hotline, which provides information and referrals to Massachusetts residents facing hunger and screens callers for eligibility in SNAP. We also employ SNAP enrollment coordinators who provide SNAP application assistance in community health centers.

Our services are designed to support people in a variety of situations, including Able-Bodied Adults Without Dependents (ABAWDs), a term that does not fully describe the individuals it includes. ABAWDs are veterans, the homeless, those re-entering the workforce after incarceration, caretakers, recent high school graduates seeking a job, former foster care youth, individuals with undiagnosed mental illness, and other adults who want to work, but are unemployed or underemployed.

Take Matt, who called our FoodSource Hotline, for example. He is working, but his job only offers 10 hours per week. He is trying to get more hours with his current employer and in the meantime also looking for additional part-time work. But these efforts have so far not been fruitful. He knows that he needs to meet the 20 hour per week requirement for SNAP, and is worried he will lose his benefits before he is able to meet them.

It is in our national best interest to assist Matt and other ABAWDs in breaking the cycle of hunger and poverty. SNAP is the first line of defense against hunger for the majority of our low-income clients. According to the Center on Budget and Policy Priorities, **SNAP has kept an average of 141,000 Massachusetts residents per year out of poverty between 2009 and 2012.**ⁱ

Loss of Waivers Will Harm Massachusetts Communities

In 2018, 62 cities and towns in Massachusetts were eligible for a waiver. With the proposed rule, it is likely that under current economic conditions, no community would be eligible for a waiver despite job shortages or local unemployment rates. For example, Provincetown on Cape Cod experienced a seasonal swing in monthly unemployment of 20.8 percentage

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points within the last calendar year. Without the waiver, workers will face the challenge of hunger in winter months while also waiting for tourists and jobs to return.

Other communities face their own set of challenges. Similar to Cape Cod, Fall River and New Bedford rely heavily on commercial fishing. A harsh or long winter means fewer jobs and greater food insecurity even for those able and willing to work. In rural northern Berkshire County, even when jobs are available, they may be unattainable due to expensive childcare and lack of affordable transportation. Not having regular access to a car should not lead to hunger. Under this rule, unfortunately for many it will.

The proposed changes would cause serious harm to over 755,000 unemployed and underemployed adults who receive SNAP under the current rules—18,000 in Massachusetts alone. It is critical that Massachusetts – and all states – continue to have the authority to waive the time limit in certain areas of our state.

SNAP Time Limits Do Not Promote Work

The existing rule limiting unemployed or underemployed ABAWD households to three months out of every 36 months has been problematic for many in our state who are struggling to find employment, training, or volunteer opportunities. It harms vulnerable people by denying them food benefits at a time when they most need it and it does not result in increased employment and earnings. At least 500,000 low-income individuals nationwide lost SNAP in 2016 due to the time limit. Taking these resources away will only leave them less able to utilize job training, find jobs, and make ends meet.

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 ten years. While a stable, living wage is indeed a pathway out of poverty, the Administration has not provided an argument that restricting nutrition benefits will lead to improved health or employment among the affected population.

The underfunded workforce system and SNAP employment and training programs are not designed or well suited to meet job training requirements or to create jobs where none exist. Put simply, there is no justification for weakening current waiver rules and exposing more vulnerable people to this SNAP eligibility cutoff. Congress weighed such cutoffs for ABAWDs during the 2018 Farm Bill debate and ultimately decided NOT to include these changes. Several pilots initiated by the 2014 Farm Bill are still underway and until the Administration and Congress fully assess and fund effective employment and training opportunities, the job training exemption is not a viable option for impacted individuals.

SNAP Improves Economic Mobility Among ABAWDs

The stated rationale for the proposed rule is to increase “self-sufficiency, well-being, and economic mobility.” Keeping SNAP accessible to more households is a more effective way to reach these goals. According to the USDA's own research, \$1 in SNAP benefits generates \$1.79 in economic activity, which can help areas with higher unemployment or labor shortages create more jobs and employ those who may otherwise be subjected to the time limit.ⁱⁱ

In 2017, Massachusetts established the Healthy Incentives Program (HIP), which provides additional support for SNAP recipients to purchase healthy, local produce. HIP further extends the economic benefit of SNAP by supporting local farmers. The Massachusetts Food Systems Collaborative estimates that each dollar spent by a SNAP recipient through HIP is an additional \$1.12 in the local economy.

By rejecting the proposed rule, the USDA can ensure that more members of our most economic disadvantaged communities can continue eating healthier diets while improving the economic conditions that contribute to unemployment or underemployment.

SNAP Improves Well-Being Among ABAWDs

All too frequently, we hear from clients that they are unable to afford both their prescription medications and a complete diet. Health issues exacerbated by poor diet would only intensify the challenges of the ABWAD population.

The link between proper nutrition and health is indisputable. A 2017 study done by Massachusetts General Hospital found that SNAP reduces individual recipient health care costs by an average of \$1,400 per yearⁱⁱⁱ- a significant health care cost reduction. We know Massachusetts is not unique in grappling with the growing cost of health care. Any rule change that reduces the household food budget is also likely to increase poor health and health care spending.

We strongly oppose USDA's proposed rule that would expose even more people to the arbitrary SNAP food cutoff policy and harm our community. Exposing over 18,000 individuals in Massachusetts to possible termination from SNAP and severely reducing state flexibility, will only further exacerbate hunger for this population.

Sincerely,



Erin McAleer

President

Project Bread-The Walk for Hunger

ⁱ Nchako, C., & Cai, L. (2018, December 3rd). *Massachusetts Supplemental Nutrition Assistance Program*. Retrieved from Center on Budget and Policy Priorities: https://www.cbpp.org/sites/default/files/atoms/files/snap_factsheet_machusetts.pdf

ⁱⁱ USDA Economic Research Service. (2018, April 11). *Supplemental Nutrition Assistance Program (SNAP) Linkages with the General Economy*. Retrieved from USDA: <https://www.ers.usda.gov/topics/food-nutrition-assistance/supplemental-nutrition-assistance-program-snap/economic-linkages/>

ⁱⁱⁱ Berkowitz, S.A.; Seligman, H.K. Rigdon, J.; Meigs, J.B.; Basu, S; Supplemental Nutrition Assistance Program Participation and Health Care Expenditures Among Low-Income Adults; 2017. <https://jamanetwork.com/journals/jamainternalmedicine/article-abstract/2653910?redirect=true>