



# COALITION ON HUMAN NEEDS

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April 8, 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:

Thank you for the opportunity to comment on USDA's Advanced Notice on requirements and services for Able-Bodied Adults Without Dependents (ABAWDs).

I am commenting on behalf of the Coalition on Human Needs, a non-profit national independent organization based in Washington, D.C. Our [member organizations](#) include human service providers, faith groups, policy experts, labor and civil rights organizations, and others who come together in support of programs and policies that assist low-income and vulnerable people. Both because our members' affiliates have direct experience seeing the benefits of the Supplemental Nutrition Assistance Program (SNAP) in communities nationwide and because we are well-acquainted with the broad range of research documenting SNAP's value, we are very concerned about proposals that would have the effect of denying SNAP assistance to more people with intermittent work experience. The USDA's request for comments seeks information about effective ways to help adults without dependents (known as ABAWDs) to gain employment. However, the policy the USDA is exploring – subjecting more adults to the three-month time limit if they cannot sustain 20-hour-per-week employment – is not going to achieve that goal. Instead, it will deny food to very low-income individuals, potentially compromising their health and making long-term employment more difficult.

The research that is available describing adults without dependents who have received SNAP shows that most do work, but sporadically. About [three-quarters](#) of them worked in the year before or after receiving SNAP benefits. They are extremely poor, with average incomes in 2015 of about 19% of the poverty line for an individual, or \$2,200 on an annual basis. Four out of five lived below half the poverty line, or \$5,835 in 2015.

Findings from a study done in [Franklin County, Ohio](#) portray individuals who have many barriers to more steady employment. One-third reported mental or physical limitations that while not qualifying them for federal disabilities programs would still stand in the way of many jobs, or of working steadily at least 20 hours per week. Among the disabilities suffered by ABAWDs in the Ohio study were depression, post-traumatic stress disorder, learning disabilities, or physical injuries. About one-quarter had not completed high school. Thirteen percent are providing care for a parent, relative, or friend. More than one-third have a felony conviction. Fifteen percent need language translation help; 40 percent do not have access to reliable transportation and/or do not have a driver's license.

When people in Ohio lost SNAP assistance because of the first imposition of the 3-month time limit in 1997, [hunger increased](#). When they received food stamps, about one-quarter of these adults reported feeling hungry often. After the loss of benefits, the proportion more than doubled, to 54 percent.

Another [study](#) looked at ABAWDs across the country during the period 2004-2009 (before and during the Great Recession), comparing work participation in areas that waived the three-month time limit to areas that did not. The authors found no difference in hours worked whether or not adults were subject to the three-month time limit.

More recently, when states end waivers that have exempted ABAWDs from the 3-month time limit, such as in Kansas and Maine, people losing SNAP assistance often find employment, but not at notably higher rates than they had in the previous year.

Low-wage employment today is marked by unreliable hours that the employee cannot control. Employers may require workers to be on call, making it impossible for them to take on a second job, but can tell workers not to come in at the last minute. With few hours and low pay, ABAWDs who work generally earn so little that they would qualify for SNAP if the time limit were not imposed. When waivers from the time limit were reduced in 2016, at least 500,000 low-income people nationwide lost SNAP. As documented by the Ohio study, these individuals were largely unable to replace their lost benefits by higher earnings, and had to seek more assistance from private charities, who could not make up for the food lost.

Mandatory participation in work, whether through paid work or job training programs, results in loss of benefits for many because sickness or disability, the need to care for a loved one, and/or lack of access to transportation get in the way. Lost SNAP benefits could lead to lost Medicaid coverage for ABAWDs in some states. People who face health problems are clearly less able to work if they cannot secure an adequate diet and have less access to medical treatment. On the contrary, nearly [three-quarters](#) of people in Ohio surveyed after newly qualifying for health coverage under their state's Medicaid expansion through the Affordable Care Act indicated that having health coverage increased their ability to seek employment.

It is important to note that every additional documentation requirement to establish eligibility for services is a roadblock that overburdened and impoverished individuals may not be able to overcome, leading to lost assistance even if the person qualifies for aid. Even in the absence of

work requirements, [15 percent of SNAP applicants](#) in Colorado and Illinois reported that they lost pay because they missed work to visit the social service office. In order to secure SNAP benefits, applicants had to contact the office three or more times, as documented in surveys in Illinois, Colorado and South Carolina. [Sixty percent](#) of applicants with severe problems such as loss of jobs or housing or the need for emergency medical care said that their needs would have been mitigated had they been able to receive benefits more quickly. This evidence suggests strongly that documenting required work will be yet another barrier to receiving help, with no evidence that it will make people more able to secure stable employment.

The Secretary of Agriculture has suggested that they need to “[remove those waivers for able-bodied adults without dependents.](#)” because “it’s become a lifestyle for some people.” The findings cited above reveal a very different picture. Adults without dependents who have been receiving SNAP benefits are for the most part working at irregular employment, unable to get steady hours either because of the nature of the jobs they can qualify for, or because health issues limit their ability to work. Reducing the ability of states to waive the three-month time limit out of three years will hurt extremely poor people without solving any of their problems.

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. 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. The waiver rules are reasonable, transparent, and manageable for states to operationalize. Any change that would restrict, impede, or add uncertainty to our 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. Increased individual exemptions would be wholly insufficient and could never make up for having to apply the time limit in areas with elevated unemployment.

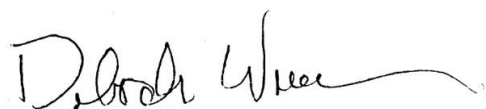
Further, the underfunded workforce system and SNAP employment and training programs are not designed or well suited to meet the job training requirements under this rule. Put simply, there is no justification for weakening current waiver rules and exposing more vulnerable people to this SNAP eligibility cutoff.

We very much take to heart the request for suggestions for approaches that can improve the employment prospects of adults without dependents (or other adults) who qualify for SNAP. The Urban Institute’s [Heather Hahn](#), in testifying before a House subcommittee, pointed to a “2014 joint paper by the US Departments of Labor, Commerce, Education, and Health and Human Services noted the evidence for helping low-skilled workers in the labor market suggests the need for ‘comprehensive and integrated strategies to concurrently address employment, training and education,’ including ‘soft skills’ training, as well as the need for child care, transportation, and other supports (US DOL et al. 2014). The report also notes that such comprehensive strategies ‘inevitably requires coordination and collaboration across systems that

provide specialized services or training, including workforce development agencies, schools and community colleges, and public and non-profit human services and employment services agencies.” Programs in which training is closely connected to specific jobs, and which integrate post-secondary credential-granting study in the preparation for those jobs work best. For people with little education and health and/or family issues to overcome, a comprehensive approach with cooperation across many services is essential, and those services must include SNAP benefits and Medicaid. It is worth investing in such training, but it is expensive and funds are not available at this time to provide it. We hope there will be investment in such a comprehensive approach to job training and placement, but it will be most effective if it is voluntary, so that resources are directed towards those most likely to make good use of it. It would be counterproductive and unacceptable to get funding for a jobs program by denying SNAP benefits to those unable to comply with program requirements.

Helping Able-Bodied Adults Without Dependents requires a clear picture of what motivates them and what is most likely to help. As noted here, the assumption that work requirements will provide the incentive to work is not based on what is known about this group of very poor individuals. In fact, the evidence is that current time limits are counterproductive and should be eliminated. To improve SNAP’s role in reducing poverty through sustained employment, nutrition assistance should be provided to all those in need, and such aid should be part of voluntary well-integrated job training and placement services.

Sincerely,

A handwritten signature in black ink, appearing to read "Deborah Weinstein", with a long, sweeping horizontal line extending to the right.

Deborah Weinstein,  
Executive Director,  
Coalition on Human Needs