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[DATE]

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:

Thank you for the opportunity to comment in opposition to USDA’s Proposed Rule on Requirements for Able-Bodied Adults Without Dependents (ABAWDs).

[Describe yourself/your organization and why you/the community you serve have a vested interest in this rule.]

The existing SNAP three-month time limit for so-called Able-Bodied Adults Without Dependents (ABAWDs) purports to solely impact adults who do not have children. In practice, however, low income children and youth also experience harm as a result of this policy. The proposed rule, by making it more difficult for states to waive the time-limit for low-income individuals facing barriers to employment, will only exacerbate the spillover effect onto vulnerable young people.

**SNAP Is the First Line of Defense Against Child Food Insecurity**

Food insecurity remains a major threat to health and wellbeing of 12.5 million children in America.[[1]](#footnote-1) This means that in 2017, one in six children lived in a household that had uncertain access to enough healthy food. **[Add child food insecurity data for your state/demographics of children you represent. For state data, see Feeding America’s** [**Map the Meal Gap report on Child Food Insecurity in 2016**](https://www.feedingamerica.org/sites/default/files/research/map-the-meal-gap/2016/2016-map-the-meal-gap-child-food-insecurity.pdf)**. See the** [**Household Food Insecurity in the United States in 2017**](https://www.ers.usda.gov/webdocs/publications/90023/err-256.pdf?v=0) **report from USDA ERS for demographic characteristics of food insecure households with children].**

Food insecurity has devastating consequences for children. Without access to healthy food, children suffer negative consequences to their health, education, and development. **[Add evidence for how food insecurity is a unique threat to the population of children you work with—i.e. children in the child welfare system, children in mixed immigrant families, children with disabilities, children in poverty.]**

As the nation’s largest federal food assistance program, the Supplemental Nutrition Assistance Program (SNAP) is the first line of defense against child food insecurity. SNAP works efficiently and effectively by providing low-income households with monthly funds specifically designated for food purchases. Research links participation in SNAP for 6 months with an 8.5 percentage point decrease in food insecurity in households with children.[[2]](#footnote-2)

SNAP is a critically important resource for children given their higher prevalence of food insecurity and high rates of participation. In 2016, more than 18 million children utilized SNAP for access to consistent food, representing 43.5 percent of participants.[[3]](#footnote-3) [**Add state and demographic data about SNAP utilization for the population of children you work with. See** [**Characteristics of SNAP Households: Fiscal Year 2017 from USDA**](file:////Users/RachelM/Documents/Budget%20Policy/Letters/When%20using%20this%20template%20please%20remember%20that%20comments%20must%20have%2030%25%20original%20content%20in%20order%20to%20be%20counted%2C%20so%20filling%20in%20the%20additional%20details%20in%20yellow%20is%20important.%20Please%20contact%20rachelm%40firstfocus.org%20with%20any%20questions.)**.]** Beyond its role in fighting food insecurity, SNAP significantly reduces child poverty and helps struggling families to make ends meet: SNAP benefits lifted 1.5 million children out of poverty in 2017 alone.[[4]](#footnote-4)

**The Existing SNAP Time Limit is Counterproductive and Harms Vulnerable Individuals**

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 prove they have obtained and maintained an average of 20 hours a week of employment. However, these requirements are often untenable for individuals who face structural barriers to employment and/or sufficient, regular work hours. Ample research suggests that these rules do not promote increased employment but instead harms health and productivity.[[5]](#footnote-5) Data from 2013 and 2014 shows that the overwhelming majority of SNAP participants who struggle to meet the threshold of 20 hours of work per week are not uninterested in working, but instead are experiencing the consequences of volatility in the low-wage labor market, caregiving duties, or personal health issues.[[6]](#footnote-6)

**The Proposed Changes to State Waiver Flexibilities Will Harm Children**

Existing state flexibilities to waive these counterproductive requirements due to economic conditions are incredibly important. The agency’s proposal to restrict those flexibilities will result in an estimated 750,000 individuals losing access to the critical support they receive from SNAP.

Because SNAP is so important for low-income and food-insecure children, children under the age of 18 and the adults who live with them are technically exempt from the three-month time limit for SNAP. However, though current rules around the SNAP time-limit explicitly exempt adults who have a dependent child under the age of 18 or live in a household with children under 18, this definition may not allow for the complex financial arrangements that low-income families utilize on to put food on the table. Our organization represents the interests of vulnerable children who as a result of this rule will experience a reduction in important resources that help meet their basic needs, even though FNS does not account for this in its cost benefit analysis. This includes:

* **Children with non-custodial parents:** Poverty is a troubling reality for custodial and noncustodial parents. The most recent available data from 2015 suggests that 3.5 million custodial parents live below the poverty line, making access to food assistance all the more important for them and their children.[[7]](#footnote-7) Thus, some 4.5 million poor and low-income custodial parents who rely on child support payments from NCPs also utilize SNAP to put food on the table for their children.[[8]](#footnote-8) Yet NCPs are often themselves low-income, with 2.1 million living below the poverty line in 2015, and 1.5 million accessing SNAP to supplement their resources to afford child support payments.[[9]](#footnote-9) Because NCPs are not exempt from the ABAWD time-limit, the proposed rule not only threatens them, but their children. An under-employed or unemployed NCP who loses SNAP may need to divert his or her income from child support payments in order to stay afloat financially, which would be particularly devastating given that child support represents more than half of the income of the families in poverty who receive it.[[10]](#footnote-10) [**Add stories from the field or specific demographic/geographic data relevant to your organization.]**
* **Children whose extended family members provide financial support:** Some low-income children may rely on food, financial assistance, or free childcare from extended family members, family friends, or a parent’s significant other who do not live with them but use SNAP to supplement their income. Households that are the most financially precarious are the most likely to rely on such transfers to make ends meet. Considering that financially precarious households are often embedded together within the same networks, they likely received money or assistance from others who were also struggling economically.[[11]](#footnote-11) If so-called Able-Bodied Adults Without Dependents in these networks lose SNAP benefits due to tightened state waiver rules, it would disrupt their ability to lend that crucial assistance to low-income children. **[Add stories from the field or specific demographic/geographic data relevant to your organization.]**
* **Children impacted by the opioid crisis:** Today, more than 2.5 million children are being raised by their grandparents or other relatives, in part because families are dealing with parental alcohol and substance abuse issues, which are growing rapidly due to the opioid epidemic.[[12]](#footnote-12) The adults who provide informal kinship care for children impacted by substance abuse issues may not do so on a consistent schedule, however. As a result, they may face obstacles in securing an exemption from ABAWD time-limits. If they lose access to SNAP in the face of tightened waiver requirements, the children they care for could experience increased poverty and food insecurity as a result. [**Add stories from the field or specific demographic/geographic data relevant to your organization.]**
* **Youth aging out of foster care and unaccompanied homeless youth:** Youth in foster care and unaccompanied homeless youth disproportionately experience significant barriers to obtaining a high school diploma, entering college, obtaining a driver’s license, accessing health insurance, maintaining housing stability, and obtaining steady employment. SNAP plays a significant role in the health and well-being of youth aging out of care and unaccompanied homeless youth with no support systems. Former foster youth often experience poor nutrition and food insecurity, and SNAP benefits help to address this problem and increase the likelihood of healthy adult outcomes.[[13]](#footnote-13) However, because former foster youth and unaccompanied homeless youth often meet the definition of an Able-Bodied Adult Without Dependents, they face obstacles accessing this critical assistance and would likely disproportionately suffer under tightened state waiver requirements. This is of particular concern after recent changes made by the Agriculture Improvement Act of 2018 (PL 115-334) that reduced states’ automatic exemption threshold from 15 percent to 12 percent. [**Add stories from the field or specific demographic/geographic data relevant to your organization.]**

**Conclusion**

Already, the SNAP time-limit for Able Bodied Adults Without Dependents adversely impacts children and vulnerable youth, even though they are not the intended targets of that policy. This proposed rule would exacerbate this problem. Furthermore, it flies in the face of Congressional intent, given the fact that Congress just concluded a review and reauthorization of SNAP in the Agriculture Improvement Act of 2018 and explicitly rejected the changes proposed.

[I/We] strongly oppose the proposed changes, as they would further expose low-income adults—as well as children who may be relying on them for help meeting basic needs—to the harm of the SNAP time-limit. Taking food off the table is no way to help individuals achieve economic mobility.

Sincerely,

[**Sign here]**

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3. Kathryn Cronquist and Sarah Lauffer, “Characteristics of Supplemental Nutrition Assistance Program Households: Fiscal Year 2017,” United States Department of Agriculture*,* February 2019, <https://www.fns.usda.gov/snap/characteristics-supplemental-nutrition-assistance-program-households-fiscal-year-2017> [↑](#footnote-ref-3)
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5. Dr. LaDonna Pavetti, “Work Requirements Don’t Cut Poverty, Evidence Shows,” Center on Budget and Policy Priorities, June 7, 2016, <https://www.cbpp.org/sites/default/files/atoms/files/6-6-16pov3.pdf> [↑](#footnote-ref-5)
6. Lauren Bauer, Diane Whitmore Schanzenbach, and Jay Shambaugh, “Work Requirements and Safety Net Programs,” The Hamilton Project, October 2018, <http://www.hamiltonproject.org/assets/files/WorkRequirements_EA_web_1010_2.pdf> [↑](#footnote-ref-6)
7. U.S. Department of Health and Human Services Office of the Assistant Secretary for Planning and Evaluation, “How Many Families Might be Newly Reached By Child Support Cooperation Requirements in SNAP and Subsidized Child care, and What Are Their Characteristics?”, July 2018, <https://aspe.hhs.gov/pdf-report/how-many-families-might-be-newly-reached-child-support-cooperation-requirements-snap-and-subsidized-child-care-and-what-are-their-characteristics> [↑](#footnote-ref-7)
8. U.S. Census Bureau, “Custodial Mothers and Fathers and Their Child Support: 2015

Current Population Survey,” April 2016, Table 4, <https://www2.census.gov/programs-surveys/demo/tables/families/2015/chldsu15.pdf> [↑](#footnote-ref-8)
9. Ibid. at 7 [↑](#footnote-ref-9)
10. Heather Hahn, “Navigating Work Requirements in Safety Net Programs: Potential Pathways for Parents,” The Urban Institute, January 2019, <https://www.urban.org/sites/default/files/publication/99479/navigating_work_requirements_in_safety_net_programs_0.pdf> [↑](#footnote-ref-10)
11. The Pew Charitable Trusts, “Extended Family Support and Household Balance Sheets: Getting by with a little help from friends and relatives,” March 2016, <https://www.pewtrusts.org/-/media/assets/2016/03/fsm_kinshipbrief.pdf> [↑](#footnote-ref-11)
12. Generations United, “In Loving Arms: The Protective Role of Grandparents and Other Relatives in Raising Children Exposed to Trauma,” 2017. [↑](#footnote-ref-12)
13. Megan Martin, Shadi Houshyar, Alexndra Citrin, DeQuendre Neeley-Bertrand, DeQuendre and Raquan Wedderburn, “Supporting Youth Aging Out of Foster Care through SNAP,” The Center for the Study of Social Policy, 2014, <https://cssp.org/resource/supporting-youth-aging-out-of-foster-care-through-snap/> [↑](#footnote-ref-13)