

April 9, 2018

VIA ELECTRONIC MAIL

<http://www.regulations.gov>

SNAP Program Development Division
Food and Nutrition Services, USDA
3101 Park Center Drive, Room 812
Alexandria, Virginia 22302

RE: Supplemental Nutrition Assistance Program: Requirements and Services for Able-Bodied Adults Without Dependents; Advance Notice of Proposed Rulemaking

To Whom It May Concern,

On behalf of the Adventist Health Policy Association (AHPA), we appreciate the opportunity to comment on the United States Department of Agriculture (USDA) proposed enforcement of work requirements for Able-Bodied Adults Without Dependents (ABAWD) in the Supplemental Nutrition Assistance Program (SNAP). Our organization is the policy voice of five Seventh-day Adventist affiliated health systems that include 84 hospitals and more than 300 other health facilities in 17 states and the District of Columbia.

AHPA represents a major segment of the U.S. hospital sector. Our member hospitals operate in a variety of settings, ranging from rural Appalachia to urban areas of California. With such diverse facilities, populations served and geographical locations, we strive to provide an objective and sound policy voice.

Below, please find AHPA's comments on the questions raised in the proposed rule regarding work requirements for ABAWDs in SNAP. Specifically, our comments address the following three issues:

- Consequences of Work Requirements
- Effective Programs
- Policy and Regulatory Changes

Consequences of Work Requirements

How could the USDA best limit ABAWD waivers as proposed in the President's budget?

Currently, federal law only allows ABAWDs to receive SNAP benefits for three months in a 36-month period. Federal agencies allow states to waive this requirement for SNAP recipients, eliminating the need for ABAWDs to work. The USDA is concerned that states are overutilizing these waivers and is proposing a limit on the use of the waivers. The President's most recent budget proposes implementation of stricter work requirements within the SNAP program as well as transitioning from a cash benefit to a meal delivery system.

AHPA does not support limiting work requirement waivers in SNAP. We believe this policy would inhibit access to SNAP benefits and further disadvantage a struggling population. A blanket limit on the work requirements waivers would *not* help enrollees achieve self-sufficiency because: (1) it fails to

address individual barriers to self-sufficiency and (2) it fails to build the skills that individuals need to succeed in the current labor market. Many SNAP recipients face additional barriers that make securing a job more difficult. Many ABAWDs lack basic job skills like reading, writing and basic mathematics.¹ Additional barriers such as a history of incarceration, insufficient childcare and unreliable transportation make finding and maintaining work challenging. Without addressing these barriers, ABAWDs will continue to struggle to achieve self-sufficiency.

Additionally, if employment is required to receive SNAP benefits then, a temporary loss of employment could result in the loss of SNAP benefits leaving many individuals hungry and further limit their ability to work. Hunger often leads to health problems such as diabetes, hypertension and poor management of chronic conditions. On average, food insecure people in the U.S. incur an extra \$1,800 in medical costs every year, accounting for \$77.5 billion in additional health care expenditures.²

There is also evidence that adding work requirements into government programs is an ineffective approach to helping individuals transition to self-sufficiency. Research on the effectiveness of Temporary Assistance for Needy Families (TANF) work requirements demonstrated that recipients who found employment continued to have income below the Federal Poverty Level (FPL). Furthermore, the modest employment increases faded with time and did not increase stable employment in most cases.³

Stricter work requirements could also negatively impact the U.S. economy. In 2014, SNAP participants spent nearly \$70 billion in food purchases.⁴ Whether the purchases are made at local farmer markets, small family-owned stores or large chain grocers, SNAP dollars are an important part of the American economy. Stricter regulations within the program could lead to ripple effects in other parts of the economy. Moreover, SNAP benefits can help eradicate poverty by allowing scarce resources to be used for other needs, such as paying for utility services and childcare. In 2012, SNAP kept about 10.3 million people out of poverty, including about 4.9 million children.⁵

If the USDA imposes limits on work requirement waivers, AHPA recommends that the USDA provides a medical screening to determine whether the applicant is mentally and physically capable of working. Eighty percent of people with mental illness are unemployed.⁶ About sixty percent of people with mental illness report a desire to work and two-thirds can successfully maintain a job with appropriate support. Yet, fewer than two percent of people in the public mental health system receive such help. The USDA requires means testing, which includes calculations on income, housing and potential family support

¹ Implementation of the Provisions and Effects on Food Stamp Program, 2001. Retrieved from: <https://www.gao.gov/assets/240/237571.pdf>

² Food Insecurity and Health Care Expenditures in the United States, 2011-2013. Retrieved from: <https://www.ncbi.nlm.nih.gov/pubmed/28608473>

³ Work Requirements in Social Safety Net Programs. Retrieved from: <https://www.urban.org/research/publication/work-requirements-social-safety-net-programs-status-report-work-requirements-tanf-snap-housing-assistance-and-medicaid>

⁴ SNAP Boosts Retailers and Local Economies. Retrieved from: <https://www.cbpp.org/research/food-assistance/snap-boosts-retailers-and-local-economies>

⁵ Safety Net More Effective Against Poverty Than Previously Thought. Retrieved from: <https://www.cbpp.org/research/poverty-and-inequality/safety-net-more-effective-against-poverty-than-previously-thought>

⁶ Road to Recovery: Employment and Mental Illness. Retrieved from: <https://www.nami.org/about-nami/publications-reports/public-policy-reports/roadtorecovery.pdf>

to measure applicant eligibility for SNAP benefits. If federal and state policies require individuals to work for SNAP benefits, they should ensure access to programs that enable the mentally-ill to sustain work.

Effective Programs

How can existing authority and resources best be used to support ABAWDs as they transition to meaningful work and self-sufficiency??

The USDA administers 15 of the 80 federal programs designed to assist low-income families. These programs are too fragmented and complex for participants to navigate. Enforcing work requirements will only further exacerbate this problem. The requirements will impose an additional administrative barrier for individuals to access food assistance and afford a nutritious diet. To support the transition to self-sufficiency, we recommend that the USDA focus instead on efforts that boost the education and skills of ABAWDs. Evidence suggests that training and education is a more successful strategy than work requirements.⁷

AHPA recommends that the USDA bolster the SNAP Education and Training (E&T) program through additional funding. The E&T is a program that helps SNAP participants gain skills, training and work experience to increase employability. The program is funded by the federal government but is administered by the states. States can choose the services offered, parameters of eligibility and contribute to additional funding. AHPA believes this program can be an effective tool in assisting recipients' progression to self-sufficiency. The USDA could promote innovative approaches to work development by tying E&T program funding to the implementation of identified best practices. Current research-based best practices are tailoring job training programs to community demographics and aligning E&T initiatives with local employment shortages.

Policy and Regulatory Changes

Are there ideas for regulatory or policy changes to better meet the needs of SNAP participants and State agencies? What is the best way to provide recipients with opportunities to move to self-sufficiency?

Recognizing that there are indirect barriers to employment, AHPA recommends that policy makers encourage states to integrate the enrollment application of social benefits such as Medicaid, SNAP and the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC). Having a joined enrollment process will give individuals greater access to the tools needed to achieve better health and secure employment. The eligibility requirements of SNAP could also be adjusted to account for increases in wage. This scaled approach to SNAP benefits would help ensure a smooth transition to self-sufficiency.

SNAP enrollees should also be connected to work development programs that provide training and career pathways. More than 80 percent of SNAP households work in the year before or the year after

⁷ The Empty Promises of Work Requirements. Retrieved from: <https://www.cbpp.org/blog/the-empty-promise-of-work-requirements>

receiving SNAP.⁸ Therefore, finding employment is not necessarily an issue among SNAP enrollees. However, most SNAP enrollees have low-wage jobs that provide no benefits, unpredictable hours and may require individuals to seek multiple jobs. This suggests the attainment of *any* job will not help an individual achieve self-sufficiency. To achieve self-sufficiency, SNAP enrollees must attain meaningful employment that provides health insurance coverage and regular working hours. Given the unpredictable hours and inconsistent work schedules of many SNAP recipients, stricter work requirements would not help promote self-sufficiency among SNAP enrollees. On the contrary, it would lead to individuals losing their SNAP benefits and consequently, their ability to stay healthy and work.

Conclusion

AHPA commends the USDA for its efforts to improve the SNAP program and believes that policies to positively impact the program should focus on empowering individuals, removing enrollment barriers and combatting the various barriers to self-sufficiency. If you have any questions or would like additional information, please contact Julie Zaiback-Aldinger, Director of Public Policy and Community Benefit, at Julie.Zaiback@ahss.org.

Sincerely,



Jeff Bromme
President
Adventist Health Policy Association

⁸ Center on Budget and Policy Priorities. Retrieved from: <https://www.cbpp.org/research/food-assistance/making-snap-work-requirements-harsher-will-not-improve-outcomes-for-low>