



April 2, 2019

VIA ELECTRONIC MAIL

<http://www.regulations.gov>

Brandon Lipps
Administrator and Acting Deputy Undersecretary
Food and Nutrition Service
United States Department of Agriculture
3101 Park Center Drive
Alexandria, Virginia 22302

RE: Supplemental Nutrition Assistance Program: Requirements for Able-Bodied Adults Without Dependents; FNS-2018-0004

Dear Mr. Lipps,

On behalf of the Adventist Health Policy Association (AHPA), we appreciate the opportunity to comment on the United States Department of Agriculture (USDA) proposed amendment of regulatory standards within 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. The mission of our faith-based, not-for-profit hospitals is to improve the health of our patients and communities.

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 health policy voice on issues of community well-being.

Below, please find AHPA's comments on amendments explored in the proposed rule. Specifically, we comment on the following issues:

- State Waivers Within the SNAP Program
- Restriction of Sub-State Area Grouping
- Efficacy of Work Requirements

General Comments

AHPA sees great value in the work of SNAP to provide nutrition assistance to low-income individuals and families. As the largest domestic hunger safety-net program, SNAP protects the health of millions of people in America. Enrollment in the program has been linked to healthier food choices, lower rates of chronic disease and the ability to participate in the American workforce.¹ Policies that decrease SNAP enrollment can increase food insecurity rates in our communities and decrease overall levels of public health.

SNAP, and the economic access it provides, is an integral part of the U.S. economy. In 2014, SNAP participants spent nearly \$70 billion in food purchases.² Decreased enrollment in the program could negatively impact grocers and local farmers unless displaced enrollees truly found employment that allowed for a similar level of food purchasing. Moreover, SNAP benefits help eradicate poverty by allowing families' scarce resources to be used for other needs. It is estimated that SNAP kept about 10.3 million people from slipping into poverty in 2012, including about 4.9 million children.³

State Waivers Within the SNAP Program

The USDA proposes to increase restrictions on the use of waivers by State SNAP agencies and limit the amount of State waivers that are approved. The proposed rule would discontinue Federal consideration of certain state-level information, including low and declining employment-to-population ratios, a lack of jobs in declining occupations or industries, and academic study or other publications that describe an area's lack of jobs.

AHPA supports the maintenance of current State SNAP administrators' flexibility and choice within the SNAP program; we oppose the proposed change. Current Federal law requires that States requesting to waive either the time limit for Able-Bodied Adults Without Dependents (ABAWDs) or the work requirement support these requests with labor statistics and other economic indicators. This allows State SNAP administrators, who are intimately aware of their region's labor market, to exercise discretion in waiving ABAWD requirements or time limitations where appropriate.

¹ United States Department of Agriculture, [Introduction to the Supplemental Nutrition Assistance Program](#).

² Wolkomir, E., The Center on Budget and Policy Priorities, [SNAP Boosts Retailers and Local Economies](#).

³ Sherman, A., [Academic Pediatrics, Boosting Low-Income Children's Opportunities Through Direct Income Support](#).

AHPA does not support instituting additional limitations on ABAWD waivers in SNAP. We believe such limitations inhibit access to SNAP benefits and further disadvantage a struggling population.

A blanket approach to State waivers would not help enrollees achieve self-sufficiency. Socioeconomic factors such as insufficient childcare or unreliable transportation often impact an individual's ability to find and maintain meaningful employment. States would be unable to consider additional barriers, such as a lack of basic job skills, faced by individuals seeking to enter the workforce. Further restriction of work requirement waivers would result in increased hunger rates, which lead to chronic health problems such as diabetes, hypertension and poor self-management of illness. On average, food insecure people in the U.S. incur an extra \$1,800 in medical costs each year, accounting for \$77.5 billion in additional health care expenditures.⁴

Restriction of Sub-State Area Grouping

The USDA proposes either a complete prohibition of contiguous-area grouping or to only allow such grouping in areas selected by the Federal government.

AHPA opposes the restriction of State agencies' ability to define areas covered by ABAWD waivers.

Currently, States are able to group contiguous areas together as one economic region provided that they support this decision with unemployment data. AHPA opposes rescinding this allowance and believes that States are best fitted to determine sub-state areas and metropolitan regions that are economically connected. We believe that an erosion of State autonomy in forming these groups could result in SNAP enrollees being removed from the program despite a demonstrable lack of sufficient jobs in their labor market.

Efficacy of Work Requirements

Based on current scientific study, AHPA does not believe that work requirements within safety-net programs are an effective way to encourage self-sufficiency and promote community wellness.

Research on the efficacy of work requirements within the Temporary Assistance for Needy Families (TANF) program demonstrates that recipients who found employment because of these requirements

⁴ Berkowitz, et. al., Health Services Research Journal, [Food Insecurity and Health Care Expenditures in the US](#).

continued to remain below the Federal Poverty Level (FPL).⁵ On average, any modest income increases faded with time and did not result in stable, permanent employment.

Instead of adding more stringent requirements, we recommend that SNAP enrollees be connected to workforce development programs that provide training and career pathways. More than 80 percent of SNAP households work either continuously or intermittently during the years of their enrollment.⁶ However, the majority of enrollees hold low-wage jobs that do not provide health insurance, mandate unpredictable work schedules and may necessitate individuals' holding multiple jobs. SNAP helps to provide needed support to these individuals.

Conclusion

AHPA commends the USDA for its efforts to improve the Supplemental Nutrition Assistance Program and believes that policies to positively impact the program should focus on fighting food insecurity, promoting enrollment for qualified populations and combatting barriers to self-sufficiency. We welcome the opportunity to further discuss any of the comments above. If you have any questions, please do not hesitate to contact me at Carlyle.Walton@AdventistHealthPolicy.org or Julie Zaiback-Aldinger, Director of Public Policy and Community Benefit, at Julie.Zaiback@AdventHealth.com.

Sincerely,



Carlyle Walton, FACHE
President
Adventist Health Policy Association

⁵ Hahn, H. et al., The Urban Institute, [Work Requirements in Social Safety Net Programs](#).

⁶ Dean, S., Bolen, E., Keith-Jennings, B. [Making SNAP Work Requirements Harsher Will Not Improve Outcomes](#).