April 1, 2019

Chief, Certification Policy Branch
SNAP Program Development, USDA Food & Nutrition Services
3101 Park Center Drive, Room 812
Alexandria, VA 22302

Re: Proposed Rule: Supplemental Nutrition Assistance Program (SNAP): Requirement for Able-Bodied Adults without Dependents RIN 0584-AE57

To Whom It May Concern:

As community foundation leaders, we are united in our commitment to reduce hunger and improve nutrition in the United States. We join together to advocate for those who are living in poverty, including over 40 million Americans facing hunger. We take seriously our role as philanthropies, partnering to ensure that basic needs are met for all.

Community foundations are public charities that work with local partners to ensure our communities are strong and vibrant and that our neighbors have the resources they need to thrive. We work to prevent hunger by granting millions of dollars each year to strengthen organizations that help families through subsidized or free meals, healthy cooking demonstrations, nutrition workshops in schools, and collaborations between farmers and wholesale distributors. These efforts are providing necessary relief to those facing food insecurity. But even with these successes, we recognize the important role the federal nutrition programs play.

We have serious concerns about the Trump Administration's notice for proposed rulemaking which would restrict states' flexibility to provide vital nutrition support to people who struggle to feed themselves and their families.

While our donors are generous, philanthropy cannot possibly eradicate hunger alone. The federal government meets 95 percent of the needs of addressing food insecurity, mostly through the Supplemental Nutrition Assistance Program (SNAP). While we are proud that the charitable sector invests an extraordinary $4.8 billion per year to meet emergency hunger needs, SNAP and similar programs invest $5.8 billion per month, or $70 billion per year, into our economy.¹ To expect the philanthropic sector to increase its expenditures by even a fraction of the twenty-fold difference it holds with our government's ability to be a solution is unrealistic. The charitable food sector is in no way equipped to respond to this crisis.

The charitable food system became unfathomably strained during the unprecedented government shutdown that resulted in the furlough of 800,000 federal employees earlier

¹https://mazon.org/assets/research-images/08-16-18-Quick-Facts-About-Hunger.jpg
this year. Our nation suddenly became aware of large parts of the American public who live paycheck to paycheck, with limited savings in the event of economic hardship. What happens when the proposed rule change results in, by the USDA's own estimates, 755,000 low-income people being kicked off the meager support SNAP currently provides?

This proposed rule change would also severely impact veterans who often face unique challenges in securing full-time work, frequently requiring longer than three months to secure employment. Considering that an estimated 1.4 million veterans live in households participating in SNAP, especially with profound health impacts among post-9/11 veterans and female veterans, we are gravely concerned that this rule change will result in direct harm inflicted upon those who served our country.

As community foundation leaders, we oppose this unnecessary proposed rule change that will worsen the hunger crisis among hundreds of thousands of Americans and undermine the efforts of the philanthropic sector.

Signed:

Adirondack Foundation
Baltimore Community Foundation
The Chicago Community Trust
Community Foundation for Southern Arizona
Community Foundation for Palm Beach and Martin Counties
Community Foundation for the Twin Tiers
Community Foundation of Sarasota County
Community Foundation of the Virgin Islands
The Community Foundation of Western North Carolina
Greater Lynchburg Community Foundation
Greater Washington Community Foundation
The Omaha Community Foundation
Pinellas Community Foundation
The Pittsburgh Foundation
Rochester Area Community Foundation
Sacramento Region Community Foundation
Saint Paul & Minnesota Foundations
Santa Fe Community Foundation
Toledo Community Foundation
Tucker Community Foundation

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3https://www.whijournal.com/article/51049-3867(17)30419-X/abstract