

## MAZON Talking Points on SNAP Waiver Proposed Rule Change

March 2019

- On February 1st, the Trump Administration posted a notice for proposed rulemaking through the U.S. Department of Agriculture (USDA) to **restrict states' flexibility to provide vital nutrition support** to people who struggle to feed themselves and their families. This triggered a 60-day comment period which ends on April 2.
- The Supplemental Nutrition Assistance Program (SNAP) is the cornerstone of our nation's nutrition safety net, and **most SNAP recipients who can work do work.**
  - Under current law, childless unemployed and underemployed adults age 18-50 are restricted to only 90 days of SNAP benefits in three years unless they can prove that they are working or participating in an employment and training program for 20 hours per week.
  - States currently have flexibility to waive this harsh and arbitrary time limit for communities that face high unemployment or insufficient jobs. USDA is trying to severely limit this critically important and common-sense flexibility that is utilized by the majority of states.
- By USDA's own estimate, the **proposed rule change would result in 775,000 people losing access to life-saving nutrition benefits.**
  - The proposal completely ignores the realities of people who work inconsistent hours, lack access to transportation, live in areas where the economy has been slow to recover, or are unable to access employment and training programs—all of whom could fail to meet the harsh time limits imposed on SNAP recipients.
  - Some politicians speak about childless adults age 18-49 in very derogatory ways. What these politicians fail to recognize is that, in many circumstances, there are not proper opportunities in their community—either appropriate jobs for people with their skills or sufficient training programs so they can learn new ones.
- This proposed rule change would **severely impact veterans** who often face unique challenges in securing full-time work, and may require more than three months to secure employment.
  - An estimated 1.4 million veterans live in households that participate in SNAP. Veteran households participate in SNAP at lower rates than non-veteran households. Post-9/11 veterans have nearly double the average rates of food insecurity.

- We know that many veterans return from combat with disabilities that make it more difficult to maintain gainful employment and provide food for themselves and their families. Households with a disabled veteran are nearly twice as likely to be food insecure as households that do not have someone with a disability.
  - Veterans can struggle to find jobs that match their skills, especially if they have little work experience beyond military service. They might also face discrimination by employers, particularly if they have a mental or physical disability. Furthermore, many recently transitioning veterans take temporary jobs but struggle to find full-time sustained work—these veterans might not be able to report 20 hours of work per week in order to receive SNAP benefits.
  - Veterans who are awaiting a disability determination face enormous challenges in making claims through the VA’s daunting claims process, where delays and multiple appeals are commonplace. During this waiting period, many veterans are unable, or limited in their ability, to access federal assistance.
  - Blue Star Families’ [2018 Military Family Lifestyle Survey](#)—the largest and most comprehensive survey of active duty and service members, veterans, and their families—found employment to be one of the top three issues of primary concern among veterans.
  - The case of Maine offers a deeply concerning example of the harmful impacts of this proposed rule change on veterans. In 2014, Governor Paul LePage chose not to utilize state waivers, so SNAP time limits were re-imposed on hundreds of thousands of people who were left without access to needed nutrition assistance. An estimated 2,800 veterans in Maine were affected by these harsh time limits—many of them continue to face unemployment and must turn to the charitable food sector to meet their basic needs.
  - Ensuring that all veterans have access to adequate and nutritious food is critical, and providing such access to disabled veterans is the least this nation owes to its returning and injured soldiers.
- This proposed rule change would **increase hunger in rural counties and small metropolitan areas**, which are more dependent on SNAP than urban counties.
    - Of the top 100 counties that participate in SNAP, 85 are rural.
    - Rural areas often face unique barriers to achieving food security, including lack of public transportation, scarcity of childcare services, lower educational attainment, fewer economic opportunities, and higher unemployment rates than urban areas.
  - This proposed rule change would **exacerbate hunger among Native Americans**, an already vulnerable and frequently overlooked population.

- One in four Native Americans is food insecure (double the national average of one in eight people).
  - Despite reports of high employment nationally, unemployment remains a huge issue in Indian Country, in some cases as high as 21%. SNAP waivers for these communities literally save lives.
  - Increasing restrictions for SNAP access will result in a spike in enrollment in the Food Distribution Program on Indian Reservations (FDPIR) by Native Americans formerly eligible for SNAP. As has occurred in the past, such a spike in FDPIR enrollment creates a concerning strain on FDPIR, which has limited available funding to serve American Indians and Alaska Natives living on reservations or in designated tribal areas.
- The proposed rule change would **heighten confusion about eligibility and deny SNAP benefits for many college students.**
  - There is already confusion about SNAP eligibility for students, and this proposed rule change will make the situation worse, likely resulting in fewer people getting the help they need. This increased confusion will also make it more difficult for higher education administrators and state regulators to identify clear eligibility determinations for students.
  - Even for students who are working, often for low wages and without benefits, SNAP helps ensure that they can cover basic needs as they complete their studies. But given the inconsistent schedules and irregular hours in service sector jobs, many working students would find it impossible to comply with the burdensome reporting requirements and would lose access to SNAP if the proposed rule were enacted.
- **SNAP is first and foremost a food security program, not a catalyst for workforce development.** It remains unclear how placing more stringent time limits on SNAP recipients would help people find and sustain gainful employment.
  - While we can all agree that work is essential, placing more stringent restrictions on struggling Americans without also expanding affordable childcare programs, access to college education, and other meaningful support systems will not help anyone find gainful employment.
  - SNAP's structure enables it to provide temporary support for many participants, and it is often a short-term support for people who experience periods of joblessness. The Center for Budget and Policy Priorities reports that on average about half of all non-disabled, childless adults who began receiving SNAP left within eight months.

- A more meaningful way to encourage work among SNAP recipients would be to invest in effective case management to help individuals successfully overcome barriers to employment—especially for people in rural areas, near Indian reservations, and in economically-distressed communities.
- This new attack against SNAP is an **attempt to circumvent congressional** intent as laid out in the recently-passed bipartisan Farm Bill reauthorization, and it could not be more out of touch with the reality of struggling American workers.
  - Instead of rulemaking that jeopardizes food assistance for struggling Americans, USDA should focus on implementing the 2018 Farm Bill provisions that will help Americans get back to work.
  - The 2014 Farm Bill established and funded—and the 2018 Farm Bill further invested in—ten pilot programs to examine best practices for SNAP employment and training. It would be more prudent for USDA to consider the data, best practices, and lessons learned from these pilot programs before seeking to make policy and programmatic changes.
- The recent 35-day **government shutdown revealed the economic vulnerability of middle-class Americans and the vital importance of our federal nutrition safety net.**
  - In recent weeks, thousands of federal workers and contractors turned to the charitable food sector to meet their basic needs. Despite dozens of food pantries springing up across the country, too many of these hard-working Americans still could not put food on the table.
  - The **charitable food sector is in no way equipped to respond to the scope of food insecurity in America**—and the shutdown only highlighted the critical need for SNAP.

Jewish text and tradition compel us to honor the dignity of every person, especially those who are struggling. **No matter a person's circumstance, no one deserves to be hungry.**