

March 19, 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:

On behalf of **MAZON: A Jewish Response to Hunger**, I am pleased to submit these comments in opposition to public notice FR Doc. 2018-28059. Based on our organization's many years of expert involvement in anti-hunger related issues, we submit for your consideration these comments focused on whether USDA should reconsider certain rules that govern—and restrict—the current waiver standards for able-bodied adults without dependents (ABAWDs) who participate in the Supplemental Nutrition Assistance Program (SNAP).

We unequivocally oppose the proposed rule change, which would restrict states' flexibility to provide vital nutrition support to people who struggle to feed themselves and their families.

Inspired by Jewish values and ideals, MAZON is a national advocacy organization working to end hunger among people of all faiths and backgrounds in the United States and Israel. For more than 30 years, MAZON has been committed to ensuring that vulnerable people have access to the resources they need to be able to put food on the table. MAZON is a leading voice throughout the country on anti-hunger issues, especially those that involve populations or problems that have been previously overlooked or ignored—this includes food insecurity among

10850 Wilshire Blvd.
Suite 400
Los Angeles, CA 90024
t (310) 442-0020
f (310) 442-0030
mazon.org

1101 14th Street, NW
Suite 930
Washington, DC 20005
t (202) 830-0730
f (202) 830-0649

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Leonard Fein (z"l)
*Founder, MAZON: A Jewish Response
to Hunger*

PRESIDENT & CEO
Abby J. Leibman

* Titles for identification purposes only
^o Past Chair

veterans, currently-serving military families, seniors, rural and Native American communities, and college students. In fact, MAZON has already commented on similar draconian proposals, as evidenced by the attached letter we submitted on April 4, 2018 regarding RIN 0584-AE57.

It is with this experience and focus that we address the proposed rule.

The Supplemental Nutrition Assistance Program (SNAP) is the cornerstone of our nation's nutrition safety net, and most SNAP recipients who are able to work do, in fact, actually work. Under current law, childless adults ages 18 to 49 are restricted to only 90 days of SNAP benefits in three years unless they can prove they are working or participating in an employment and training program for 80 hours per month. States currently have flexibility to request waivers from this harsh and arbitrary time limit for communities that face high unemployment or insufficient job opportunities. USDA's proposed rule change severely limits this critically important and common-sense flexibility that is utilized by the majority of states.

Harsher limitations on accessing SNAP ignore the complex realities of low-income families. This decision to restrict waivers will exacerbate already difficult circumstances, not alleviate them.

Needless and Egregious Harm to the American People

This proposed rule change will have a devastating impact on Americans of all walks of life. Working-age adults without minor children are by no means a monolithic population. Approximately 45% are female, and of them, nearly one third

are over the age of 40. Roughly half of ABAWDs are Caucasian, one third African American, and 10% Latinx.¹

Rural Americans

Rural areas often face unique barriers to achieving food security including a lack of public transportation, scarcity of childcare services, lower educational attainment, fewer economic opportunities and higher unemployment rates than urban areas.² With the largest proportion of SNAP participants, rural counties and small metropolitan areas are more dependent on SNAP than urban counties. Of the top 100 counties that participate in SNAP, 85 are rural.³ There is stunning evidence that this proposed rule change would cause extraordinary harm to rural communities in Southern states.⁴

In a recent speech about the need for economic development in high-poverty rural communities, Chairman of the Federal Reserve Bank Jerome Powell explained that rural areas “generally lack diverse industries and employment options and often have suffered from decline in a traditional industry.”⁵ While current data show a strong economy nationally, this is not true for rural America where poverty remains a persistent challenge.⁶

The Working Poor

¹ <https://www.cbpp.org/research/food-assistance/who-are-the-low-income-childless-adults-facing-the-loss-of-snap-in-2016>

² <https://www.ers.usda.gov/webdocs/publications/90556/eib-200.pdf>

³ <https://www.dailyonder.com/geography-food-stamps/2018/12/31/25422/>

⁴ <https://www.mathematica-mpr.com/our-publications-and-findings/publications/proposed-changes-to-the-supplemental-nutrition-assistance-program-waivers-to-work-related-time>

⁵ <https://www.reuters.com/article/us-usa-fed-powell-analysis/in-rural-mississippi-still-waiting-on-recovery-idUSKCN1Q30JH>

⁶ <https://www.federalreserve.gov/newsevents/speech/powell20190212a.htm>

We also know that the majority of SNAP recipients who can work do work. Among those who would be harmed by this proposed rule, roughly 75% worked the year before and/or the year after receiving SNAP. Many of these people continuously experience periods of work and unemployment, stuck in a devastating cycle of inconsistent low-skill, low-wage jobs that are unable to lift anyone out of poverty.⁷ The individuals most at risk of losing SNAP benefits under the proposed rule are workers who experience normal labor market fluctuations and those who should be eligible for exemptions but often do not receive them.⁸

Ample evidence suggests that harsh SNAP time limits fail to “increase self-sufficiency, well-being, and economic mobility” as intended.⁹ In fact, we know that the vast majority of people subjected to these time limits remained poor or even became poorer.¹⁰ Even among conservative policy experts who support the principle of work requirements, poorly-designed policies like this proposed rule raise concerns and are considered to be unreasonable, unrealistic, untested, and clearly designed to cut caseloads and costs—not provide needed assistance and a pathway to self-improvement for those who are struggling.¹¹

U.S. Veterans

We are deeply concerned by the evidence that this proposed rule change would severely impact veterans who often face

⁷ <https://www.cbpp.org/research/food-assistance/who-are-the-low-income-childless-adults-facing-the-loss-of-snap-in-2016>

⁸ http://www.hamiltonproject.org/blog/workers_could_lose_snap_benefits_under_trumps_proposed_rule

⁹ <https://www.whitehouse.gov/presidential-actions/executive-order-reducing-poverty-america-promoting-opportunity-economic-mobility/>

¹⁰ <https://www.cbpp.org/research/poverty-and-inequality/work-requirements-dont-cut-poverty-evidence-shows>

¹¹ <https://mlwiseman.com/wp-content/uploads/2019/01/Farmbill.120118.pdf>

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.¹² Evidence suggests that veteran households participate in SNAP at lower rates than non-veteran households, indicating that there are thousands who qualify but have not applied for this essential lifeline.¹³ Post-9/11 veterans have nearly double the average rate of food insecurity¹⁴ and recent scholarship has raised concerns about the high rate of food insecurity and resultant health impacts for women veterans.¹⁵ We know that many veterans return from combat with disabilities, sometimes undiagnosed or not fully recognized, that make it more difficult to maintain gainful employment and provide food for themselves and those who rely on them, even if they do not meet the definition of “dependent.” Households with a disabled veteran are nearly twice as likely to be food insecure as households that do not have someone with a disability.¹⁶

The Blue Star Families 2018 Military Family Lifestyle Survey—the largest and most comprehensive survey of active duty service members, veterans, and their families—found employment to be one of the top three issues of primary concern among veterans.¹⁷ Veterans often struggle to find jobs that match their skills, especially if they have little work experience beyond military service. They might also face discrimination from employers, particularly if they have a mental or physical

¹² <https://www.cbpp.org/research/food-assistance/snap-helps-almost-15-million-low-income-veterans-including-thousands-in>

¹³ <https://www.cbpp.org/research/food-assistance/snap-helps-almost-14-million-low-income-veterans-including-thousands-in>

¹⁴ <https://www.ncbi.nlm.nih.gov/pubmed/24806818>

¹⁵ [https://www.whijournal.com/article/S1049-3867\(17\)30419-X/abstract](https://www.whijournal.com/article/S1049-3867(17)30419-X/abstract)

¹⁶ <https://www.cbpp.org/research/food-assistance/snap-helps-almost-15-million-low-income-veterans-including-thousands-in>

¹⁷ <https://bluestarfam.org/survey/>

disability. Furthermore, many recently transitioning veterans take temporary jobs but struggle to find full-time sustained work that is a good fit for their skills and experience—these veterans will not be able to regularly report 20 hours of work per week in order to receive SNAP benefits.

In addition to employment concerns, veterans who are awaiting a disability determination face enormous challenges in making claims through the U.S. Department of Veterans Affairs (VA) daunting claims process, where delays and multiple appeals are commonplace. During this waiting period, many veterans who cannot work are also unable, or limited in their ability, to access federal assistance.

The state 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 request a SNAP waiver for working-age adults without minor children, for which the state of Maine was eligible. As a result of this action, many thousands of Maine residents were stripped of access to needed nutrition assistance from SNAP, including an estimated 2,800 veterans affected by these harsh time limits, many of whom continue to face unemployment and must turn to the charitable food sector to meet their basic needs.

We urge USDA to consider the story of Tim Keefe, a veteran living in Maine whose story provides a personal and painful glimpse of the impact of this proposed rule change. When Governor LePage decided not to seek a waiver for the ABAWD SNAP time limit, Tim lost his access to SNAP—one of the only supports that helped him get by as he was desperately trying to find employment. He became homeless and reported feeling “like a cave man.”¹⁸ Tim resorted to eating squirrels that he caught to survive the brutal Maine winter, taking a great toll on

¹⁸ <https://bangordailynews.com/2017/06/03/politics/i-felt-like-a-caveman-how-work-requirements-for-state-benefits-hurt-one-maine-man/>

his health and well-being. He eventually was able to qualify again for SNAP assistance when he turned 50. The SNAP benefits he receives now are a lifeline for Tim and enable him to regularly put food on the table once again.

Sadly, Tim's story is not unique to the veteran experience in America. Veterans regularly need temporary supplemental nutrition assistance precisely because they frequently find themselves in periods of transition. It does not matter whether they are recently returning from service or have already long contributed to our workforce. Nobody deserves to be destabilized by hunger while trying to get back on their feet. Ensuring that all veterans have access to adequate and nutritious food is critical, and providing such access to veterans is the least this nation owes to its returning service members who have made such great sacrifices in service to our country.

Exacerbated Hunger Among Native Americans

As the first non-Native member of the Native Farm Bill Coalition, MAZON is deeply concerned about the profound harm this proposed rule change will have on American Indian and Alaska Native individuals. We know that one in four Native Americans is food insecure (double the national average of one in eight), and this assault on SNAP eligibility clearly will exacerbate hunger and poverty in this particularly vulnerable and frequently overlooked population.¹⁹

Despite reports of high employment on a national scale, unemployment rates on reservations remain dangerously high, in some cases as high as 21%, and in some communities much higher.²⁰ For these communities, waivers for SNAP time limits

¹⁹ <http://www.nativepartnership.org/site/DocServer/2017-PWNA-NPRA-Food-Insecurity-Project-Grow.pdf?docID=7106>

²⁰ <https://www.bloomberg.com/news/articles/2018-04-05/where-u-s-unemployment-is-still-sky-high-indian-reservations>

literally save lives, especially considering the geographic isolation and the impact still felt today by historic violation of treaties with multiple tribes, generations of discrimination, forced attempts of assimilation, and state-sponsored genocide.

Denying states the ability to apply for waivers will further strain the Food Distribution Program on Indian Reservations (FDPIR) which serves American Indians and Alaska Natives living on reservations or in designated tribal areas. In 2018, FDPIR served an average of 87,216 participants—mostly low-income individuals and families, working adults, children, people with disabilities, and seniors.²¹ FDPIR was designed as an alternative to SNAP and serves some overlapping populations on Tribal reservations, so changes to SNAP eligibility policies will impact FDPIR.²² Because FDPIR's funding is capped at a fixed dollar amount, there is a real concern about the exhaustion of FDPIR funds in the event of a spike in participation caused by individuals cut off from SNAP benefits due to the proposed rule change.²³

Mary Greene Trottier, a member of the Spirit Lake Sioux Nation and President of the National Association of FDPIR, recently testified before the U.S. House Committee on Natural Resources about the impacts of the recent partial government shutdown on Indian Country and the importance of FDPIR to Tribal members. In a compelling portion of her testimony, Ms. Trottier recounted how FDPIR was impacted by changes to SNAP benefits in 2013:

We know from experience that any time SNAP benefits are reduced or taken away, our program [FDPIR] sees an immediate rise in applications as people seek to feed

²¹ <https://fns-prod.azureedge.net/sites/default/files/pd/fdpart.pdf>

²² <https://fns-prod.azureedge.net/sites/default/files/ops/StudyofFDPIR.pdf>

²³ <https://www.phi.org/uploads/files/FDPIR%20Module%20-%20CCRWF%20Nutrition%20Primer.pdf>

themselves and their families. In some cases there is a 25 percent increase in participation [...] when SNAP benefits are reduced. We saw this in October 2013, when the American Recovery and Reinvestment Act (ARRA) expired and SNAP benefits were reduced. In the month after ARRA's expiration, we saw an immediate rise in participation across FDPIR sites in all our regions. Unfortunately, this rise in participation does not come with increased funding. We must try to do more with less.²⁴

We cannot count on FDPIR to meet the needs of every food insecure Native American. Of the 573 tribes recognized by the federal government, FDPIR operates among only 276 tribes. SNAP is the *only* option available to alleviate food insecurity in 297 tribal communities.²⁵ Furthermore, since FDPIR exclusively applies to tribes recognized by the federal government, the hundreds of tribes recognized by states alone and not by the federal government are already unable to utilize the limited amount of funding available that exists for FDPIR to supplement loss of access to SNAP.

Finally, the federal government must adequately and appropriately consult with all federally-recognized tribes to ensure meaningful and timely input on legislative proposals, policy matters and regulatory changes that have tribal implications. Consultations and related efforts to improve operation and administration of federal nutrition programs operating in Indian Country stem from a recognition that the U.S. has a solemn obligation to support tribal sovereignty and protect the well-being of these communities at a level comparable to non-Natives. USDA's proposed rule change will

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<https://naturalresources.house.gov/imo/media/doc/Mary%20Greene%20Trotter-Testimony.pdf>

²⁵ <https://fns-prod.azureedge.net/sites/default/files/fdpi/pfs-fdpi.pdf>

have a substantial direct and disproportionate impact on Native communities, on and off reservations. Accordingly, before moving forward with this rulemaking proposal, our government has a duty to consult with tribal sovereigns about this proposed rule change and to consider their concerns and recommendations about how to mitigate potential negative impacts on Native communities.²⁶

College Students

The proposed rule change denies SNAP access to certain postsecondary students without dependents, as well as non-custodial student-parents who are enrolled less than part-time. When these students are denied the ability to document hours of countable work-related activities while otherwise not being exempt, the federal government will be harming one of the greatest sources of our workforce development by making students food insecure and decreasing their ability to complete coursework.

A new report from the Government Accountability Office (GAO) found that a shocking 39% of all undergraduate students in the country—almost 7.3 million—are at risk of hunger because of low household income.²⁷ Unfortunately food insecurity often prevents students from completing degrees and credentials because they are too hungry to learn. Stable part-time work remains elusive to this student population, many of whom participate in SNAP to ensure that they can cover basic needs because of inconsistent schedules, low wages, and lack of benefits.²⁸

²⁶ <https://www.federalregister.gov/documents/2000/11/09/00-29003/consultation-and-coordination-with-indian-tribal-governments>

²⁷ <https://www.gao.gov/products/GAO-19-95>

²⁸ <https://www.jff.org/resources/alleviating-poverty-opportunity-youth/>

There is already confusion about SNAP eligibility for students, and this proposed rule change will only worsen the situation. This confusion will also increase difficulty for higher education administrators and state regulators in identifying clear eligibility determinations for students.

Subversion of Democracy

Not only would this proposed rule cause unprecedented harm to already struggling populations in America, it is an unprecedented undermining of our democracy itself.

At a time of unprecedented political polarization, it is notable that the Agriculture Improvement Act of 2018, commonly referred to as the Farm Bill, was reauthorized with historic bipartisan margins of support by votes of 369-47 in the House of Representatives²⁹ and 87-13 in the Senate.³⁰ As a result of thoughtful and engaged debate and deliberation, Congress agreed that significant changes to the SNAP ABAWD waivers were unwarranted and unwise—the bill instead strengthens ten pilot programs that are currently examining best practices for SNAP employment and training. In stark contrast, this arbitrary new proposed rule change was announced on the same day that President Trump signed the Farm Bill into law. Designed to curtail SNAP participation, the Administration's proposal contradicts express Congressional intent and is a callous and calculated attempt to circumvent the democratic process as evidenced clearly in the carefully-negotiated final Farm Bill.

The proposed rule change could not be more out of touch with the reality of struggling American workers and families. USDA should focus on implementing the 2018 Farm Bill provisions that will help Americans get back to work, not resort to

²⁹<http://clerk.house.gov/evs/2018/roll434.xml>

³⁰https://www.senate.gov/legislative/LIS/roll_call_lists/roll_call_vote_cfm.cfm?congress=115&session=2&vote=00259

rulemaking that is a slap in the face to Democracy and jeopardizes critical nutrition assistance for those who need help to put food on the table.

By USDA's own estimate, the proposed rule change would result in 755,000 people losing access to life-saving nutrition benefits.³¹ The proposal completely ignores the realities of people who are willing to work but face inconsistent work hours, lack access to reliable transportation, live in areas where the economy has been slow to recover from the Great Recession, or are unable to access employment and training programs—all of whom could fail to meet the burdensome work reporting requirements imposed on SNAP recipients.

The Administration's stated goal of subjecting more working-age adults without minor children to time limits for SNAP benefits is a tactic designed to cause more hardship to the very people USDA claims to help. The current SNAP eligibility restrictions are already punitive as is, with waivers intended for parts of the country where jobs and training opportunities are not readily available. Restricting states' ability to issue waivers will unrealistically penalize people and increase hunger—the very opposite of SNAP's intended purpose.

Importantly, the 2018 Farm Bill lowered the number of people that states can exempt from SNAP time limits. The new law limits states to exempting only up to 12% (down from 15%) of adults subject to current SNAP time limits, which clearly marks the intent by Congress for policy adjustments concerning state waivers for SNAP time limits. However, the USDA proposed rule change would prohibit states from carrying over any unused percentages from year to year, which could result in penalizing

³¹ https://www.washingtonpost.com/business/economy/trump-administration-aims-to-toughen-work-requirements-for-food-stamps-recipients/2018/12/20/cf687136-03e6-11e9-b6a9-0aa5c2fcc9e4_story.html

those states in years when their economies take a downward turn and more families struggle to put food on the table.

State Flexibility

The proposed rule change directly assaults states' flexibility and ability to devise meaningful workforce development programs that actually empower SNAP recipients to find and sustain stable work.³² Waivers help states provide reprieve for communities with high unemployment and limited capacity for civil society to support and empower SNAP recipients.³³

Every state except Delaware has at some point requested to waive time limits on SNAP since the adoption of the 1996 welfare reform law—this fact demonstrates that states need a certain amount of flexibility in order to ensure that individuals and families can try to stave off hunger when they fall on hard times. In fact, 33 states, the District of Columbia, Guam, and the Virgin Islands are currently approved for statewide or partial time limit waivers, again affirming that there is a genuine need for states to have the flexibility to address their unique economic circumstances.³⁴

Charity Alone Cannot End Hunger

The charitable food sector invests a mighty \$5 billion per year to meet emergency hunger needs, however the federal government—mostly through SNAP—provides the vast majority of all food assistance in this country. Additionally, SNAP and similar programs pump \$5.8 billion per month, or \$70 billion per year, into the U.S. economy.

³² <https://www.cbpp.org/research/food-assistance/waivers-add-key-state-flexibility-to-snaps-three-month-time-limit>

³³ <https://www.cbpp.org/research/food-assistance/waivers-add-key-state-flexibility-to-snaps-three-month-time-limit>

³⁴ <https://www.fns.usda.gov/snap/abawd-waivers>

Stripping people of critical SNAP benefits will directly impact the charitable food system, which is already strained. The recent unprecedented government shutdown revealed that many Americans are living paycheck to paycheck, with limited savings in the event of economic hardship. With thousands of people—including federal workers—turning to the charitable food sector to meet their basic needs, the shutdown also illuminated the vital importance of our federal nutrition safety net. What happens when 755,000 low-income people are kicked off the meager support SNAP currently provides? To expect an extraordinarily generous 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 woefully unrealistic and dangerous.³⁵

Charities cannot make up the difference.

SNAP Strengthens Our Economy

We know that SNAP fuels economic growth in this country. Retailers of all sizes benefitted from the \$63 billion redeemed in 2017 through SNAP funds.³⁶ Based on the most recent data available, 10% of all food consumption dollars comes from SNAP.³⁷ Firms that accept SNAP experienced an average 4% increase in business between 2013-2017.³⁸

³⁵ <https://www.seattletimes.com/nation-world/private-charity-no-match-for-federal-poverty-aid-experts-say/>

³⁶ <https://www.cbpp.org/research/food-assistance/snap-boosts-retailers-and-local-economies>

³⁷ <https://www.cbpp.org/research/food-assistance/snap-boosts-retailers-and-local-economies>

³⁸ <https://www.cbpp.org/research/food-assistance/snap-boosts-retailers-and-local-economies>

Without SNAP, our economy would lose between 0.53% and 1.03% of GDP.³⁹ In fact, every SNAP dollar spent expands the economy by \$1.70.⁴⁰ By removing 755,000 people from SNAP, USDA's proposed rule change would result in a self-inflicted wound on our economy that would be felt in every state and the District of Columbia.

Invest in Evidence-Based Solutions

SNAP is first and foremost a food security program, not a catalyst for workforce development. It remains unclear how restricting SNAP benefits would help people find and sustain gainful employment. Placing more stringent restrictions on struggling Americans will not help anyone find gainful employment. A more meaningful way to encourage work among SNAP recipients would be to invest in effective job training programs with robust case management to help individuals successfully overcome barriers to employment—especially for people in rural areas, on or near Indian reservations, and in economically-distressed communities.

USDA has already invested in pilot employment and training programs in 10 socioeconomically and geographically diverse states.⁴¹ Among the most successful of these programs is the partnership with the Washington State Department of Social and Health Services Resources to Initiate Successful Employment (RISE) project. RISE empowers and serves individuals receiving SNAP who face significant barriers to employment—this includes veterans, people experiencing homelessness, individuals with limited English proficiency, and non-custodial parents with child support obligations. Case

³⁹ <https://www.marketwatch.com/story/prolonged-shutdown-could-slash-gdp-along-with-food-stamps-economist-says-2019-01-07>

⁴⁰ https://www.cbpp.org/research/food-assistance/snap-boosts-retailers-and-local-economies#_ftn6

⁴¹ <https://fns-prod.azureedge.net/sites/default/files/snap/SNAP-ET-Pilot-Summaries.pdf>

managers employed by community colleges and community-based organizations help lower barriers to employment by leveraging housing resources, working with the Division of Child Support for clients who are delinquent in child support payments, and creating accelerated training strategies and job placements within in-demand or high growth industries.⁴²

Washington's RISE program played a critical role in the state's workforce development efforts, empowering over 40,000 people with employment, training, and support services in the Greater Seattle Area.⁴³ Of the individuals enrolled in the program between 2009 and 2011, 71% were employed with a median hourly wage of \$11 per hour and over \$33 million was generated for the community-based organizations and community colleges to deliver the program training.⁴⁴

The U.S. would be far better served by replicating this program's success across the country instead of pulling the rug out from under vulnerable Americans while they are already experiencing hardship.

Conclusion

MAZON is deeply concerned that the Administration is going down a dangerous path of proposed rulemaking that seems intended to discourage SNAP use without any meaningful alternatives to economic empowerment. If adopted, this proposed rule change would hurt hundreds of thousands of SNAP recipients—veterans, Native Americans, college students, and people living in rural and remote communities, and other vulnerable sectors of our nation—all of whom are vital to our

⁴² <https://fns-prod.azureedge.net/sites/default/files/snap/SNAP-ET-Pilot-Summaries.pdf>

⁴³ https://www.nationalskillscoalition.org/resources/publications/file/Washington-SNAP-brief-web_FINAL.pdf


⁴⁴ https://www.nationalskillscoalition.org/resources/publications/file/Washington-SNAP-brief-web_FINAL.pdf

collective strength and success. MAZON urges USDA to rescind this proposed rule change and instead dedicate resources toward strengthening employment and training opportunities to help people find pathways to sustainable and meaningful employment.

If the purported goal of this proposed rule change is to “increase self-sufficiency, well-being, and economic mobility,” this Administration’s actions are misguided and its priorities troubling.⁴⁵ I would refer you to the comments submitted on behalf of MAZON on April 4, 2018 in response to the Advance Notice of Proposed Rulemaking regarding SNAP and requirements and services for ABAWDs (included with these comments), which included recommendations about how to improve SNAP and better help those who struggle with food insecurity in this country.

We remain unwavering in our opposition to this proposed rule change, which makes an end-run around congressional intent and would severely curtail states’ flexibility to provide life-saving nutrition support to their residents who struggle to feed themselves and their loved ones.

Sincerely,



Abby J. Leibman
President and CEO

⁴⁵ <https://www.whitehouse.gov/presidential-actions/executive-order-reducing-poverty-america-promoting-opportunity-economic-mobility/>