

April 4, 2018

Ms. Sasha Gersten-Paal  
Chief, Certification Policy Branch  
SNAP Program Development, USDA Food & Nutrition Service  
3101 Park Center Drive, Room 812  
Alexandria, VA 22302

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Washington, DC 20005  
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Re: Advanced Notice of Proposed Rulemaking: Supplemental  
Nutrition Assistance Program: Requirements and Services for  
Able-Bodied Adults Without Dependents  
RIN 0584-AE57

Dear Ms. Gersten-Paal,

On behalf of **MAZON: A Jewish Response to Hunger**, I am pleased to submit these comments regarding input requested about whether USDA should reconsider certain rules that govern the 3-month time limit on childless adults for the Supplemental Nutrition Assistance Program (SNAP).

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 facing veterans, currently serving military families, seniors, Native Americans, and college students.

The Jewish community has a rich tradition of asking questions and wrestling with different perspectives in order to discover the meaning and truth about an issue. However, asking the *right* questions is critical in the pursuit of understanding. We are concerned that the focus for USDA's solicited input to inform the proposed rulemaking is misdirected, and the questions being asked will not advance the stated goals of addressing food insecurity and helping people move out of poverty. In short, they are not the right questions.

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**SNAP is first and foremost a food security program**, not a catalyst for workforce development. The framing of this request for public comments that links the goal of addressing food insecurity with “helping able-bodied SNAP recipients obtain and maintain employment and aligning program regulations with the President’s Budget proposals related to ABAWDs” misconstrues the purpose of the SNAP program and approaches the issue using an incorrect premise, ensuring that recommendations will not be responsive to the actual goals of this long-standing program. This request for comments does not inspire us to provide suggestions, input, and answers; instead, it has only provoked more questions:

- How would placing more stringent time limits on able-bodied adults without dependents (ABAWDs) receiving SNAP actually help people to find and sustain gainful employment? What is the evidence and data to support this notion? What data exists to show how severe time-limits have contributed to employment for recipients of SNAP and other federal assistance programs?
- Why is the focus for USDA’s inquiry on processes and procedures affecting ABAWDs and not on additional investments to ensure access to employment and training opportunities to help move them towards self-sufficiency? Why does this inquiry not address the importance of case management and other supports that take into consideration the real circumstances and challenges faced by unemployed individuals that have not only demonstrated efficacy but are designed to make the transition to employment much more effective?
- Why do states have the option to offer Employment and Training (E&T) on a voluntary basis to certain or all SNAP participants but are not mandated to do so, and why does this request for comments not seek insights about whether this policy should be reconsidered?
- Does USDA recognize that ABAWDs are by no means a monolithic population, including veterans, college students, those suffering from mental health challenges, and individuals formerly in the foster care system? How does USDA envision ensuring the employment of this diverse and complex population in three months or fewer? What considerations do USDA and states currently make to account for the diverse circumstances and challenges by unemployed ABAWDs trying to find employment? What more could USDA and states do to recognize and address the needs of this diverse population?
- What is USDA doing to increase employment, training, and workforce participation among ABAWDs in collaboration with other federal agencies that have more experience and expertise in these areas? Why

is so much burden to increase employment being placed on SNAP, which is a nutrition assistance program not an employment training program?

- Why is USDA seeking input on these questions now, when the results of the SNAP E&T pilot programs called for in the last Farm Bill are not yet available? Would it not be more prudent and helpful to consider the data, best practices, and lessons learned from those pilot programs before seeking to make policy and programmatic changes? Would making such changes without the benefit of the results of these pilot programs be considered irresponsible and a disservice to the SNAP program and the millions of Americans who receive vital assistance from it?
- Does USDA truly believe that the receipt of SNAP benefits prevents unemployed ABAWDs from seeking and securing gainful employment? Does USDA believe that revoking SNAP benefits after a three-month time period will notably increase employment rates for ABAWDs? What is the evidence to support these beliefs?
- Does USDA believe that hunger is the best motivator for self-improvement? Is government-imposed hunger—forcing people off needed benefits without adequate training or opportunities—an appropriate function of the federal government? What are the moral justifications for this policy?

While we welcome the chance to address opportunities for improvement of the SNAP program, we fail to understand the singular focus on ABAWDs, which completely ignores the complex realities of their lives, the economic circumstances of the diverse regions of this country, and the lack of data to support cutting them off from nutrition assistance. The rhetorical framing of these proposals, and the proposals themselves, seek to punish struggling Americans with harsh penalties for conditions beyond their control. MAZON hopes that USDA can answer our questions to help provide greater clarity and vision to the proposed changes to SNAP. We hope that USDA can take a step back to ask the *right* questions about how to improve SNAP and better help those who struggle with food insecurity in this country.

Sincerely,



Abby J. Leibman  
President and CEO