

**Congress of the United States**  
**Washington, DC 20515**

May 24, 2019

The Honorable Sonny Perdue  
Secretary  
U.S. Department of Agriculture  
1400 Independence Ave., S.W.  
Washington, DC 20250

Dear Mr. Secretary:

We are writing to express serious concern regarding USDA's Proposed Rulemaking, "Supplemental Nutrition Assistance Program: Requirements for Able-Bodied Adults without Dependents (84 FR 980)." We are particularly concerned about the impact this proposed rule change would have on veterans, who often face unique challenges in securing and maintaining full-time work.

Under current law, able-bodied adults without dependents (ABAWDs) 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, but USDA's proposed rule change would restrict states from this flexibility that is utilized by the majority of states. According to USDA's analysis, over 755,000 people—including tens of thousands of veterans struggling to find work—would lose access to SNAP if the rule were to be implemented.

Most SNAP recipients who can work already do. In households with at least one working-age non-disabled adult, about 80% of those on SNAP who are required to work do so in the year before or the year after being on the program.<sup>1</sup> Of individuals who receive SNAP for 8 years or longer, only 2% are able-bodied adults without dependents.<sup>2</sup> The small number of SNAP recipients who are not working often face steep barriers to employment including lack of available jobs, transportation, or affordable childcare, health challenges, caregiving obligations, and lack of basic education or skills.

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<sup>1</sup> Keith-Jennings, B., & Chaudhry, R. (2018, May 30). *Most Working-Age SNAP Participants Work, But Often in Unstable Jobs*. Center on Budget and Policy Priorities. Retrieved from <https://www.cbpp.org/research/food-assistance/most-working-age-snap-participants-work-but-often-in-unstable-jobs>

<sup>2</sup> Food and Nutrition Service. (2016). *Characteristics of Able-bodied Adults without Dependents*. US Department of Agriculture. Retrieved from <https://fns-prod.azureedge.net/sites/default/files/snap/nondisabled-adults.pdf>

An estimated 1.4 million veterans live in households that participate in SNAP.<sup>3</sup> 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 these critical nutrition benefits.<sup>4</sup> Post-9/11 veterans suffer food insecurity at nearly double the average rate<sup>5</sup> and recent scholarship has raised concerns about the high rate of food insecurity and resultant health impacts for women veterans.<sup>6</sup> 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.<sup>7</sup> However, USDA’s proposed rule provides very limited data on the ABAWDs population and it is unclear as to the breadth of data the Department used to formulate its proposed changes. To date, we remain concerned that USDA has not released data on the specific demographics that make up the ABAWD population, including the number of ABAWDs that are veterans.

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.<sup>8</sup> 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 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 might not be able to regularly report 20 hours of work per week in order to receive SNAP benefits.

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<sup>3</sup> Keith-Jennings, B., & Cai, L. (2018, November 8). *SNAP Helps Almost 1.4 Million Low-Income Veterans, Including Thousands in Every State*. Center on Budget and Policy Priorities. Retrieved from <https://www.cbpp.org/research/food-assistance/snap-helps-almost-15-million-low-income-veterans-including-thousands-in>

<sup>4</sup> Keith-Jennings, B., & Cai, L. (2018, November 8). *SNAP Helps Almost 1.4 Million Low-Income Veterans, Including Thousands in Every State*. Center on Budget and Policy Priorities. Retrieved from <https://www.cbpp.org/research/food-assistance/snap-helps-almost-15-million-low-income-veterans-including-thousands-in>

<sup>5</sup> Widome, R., Jensen, A., Bangerter, A., & Fu, S. S. (2014). Food insecurity among veterans of the US wars in Iraq and Afghanistan. *Public Health Nutrition*, 18(5), 844-849. doi:10.1017/s136898001400072x

<sup>6</sup> Narain, K., Bean-Mayberry, B., Washington, D. L., Canelo, I. A., Darling, J. E., & Yano, E. M. (2018). Access to Care and Health Outcomes Among Women Veterans Using Veterans Administration Health Care: Association With Food Insufficiency. *Womens Health Issues*, 28(3), 267-272. doi:10.1016/j.whi.2018.01.002

<sup>7</sup> Keith-Jennings, B., & Cai, L. (2018, November 8). *SNAP Helps Almost 1.4 Million Low-Income Veterans, Including Thousands in Every State*. Center on Budget and Policy Priorities. Retrieved from <https://www.cbpp.org/research/food-assistance/snap-helps-almost-15-million-low-income-veterans-including-thousands-in>

<sup>8</sup> Survey Results - Blue Star Families. (2018). Retrieved from <https://bluestarfam.org/survey/>

There is much work ahead to help veterans and others who struggle with hunger to get on a path to self-sufficiency. A recent study by IMPAQ International noted that among veterans experiencing food insecurity, less than one-third live in households that participate in SNAP.<sup>9</sup> We would much prefer to focus our attention on the many ways we could better support veterans and others experiencing food insecurity and joblessness, rather than the ways we could take that support away. USDA's rule change proposal will not encourage self-sufficiency or reduce hunger in America. We strongly urge you to rescind this proposed rule.

Sincerely,



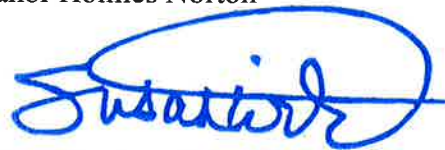
Mark Takano



Eleanor Holmes Norton



Jimmy Panetta



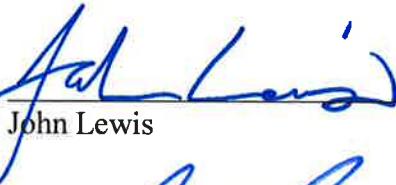
Susan Wild



Madeleine Dean



Tim Ryan



John Lewis



Seth Moulton



Chellie Pingree



Sean Patrick Maloney

<sup>9</sup> Pooler, J., Srinivasan, M., Mian, P., Miller, Z., (November 2018). *Veterans Food Insecurity*. IMPAQ International. Retrieved from <https://www.impaqint.com/work/issue-briefs/veterans-and-food-insecurity>

  
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Angie Craig

  
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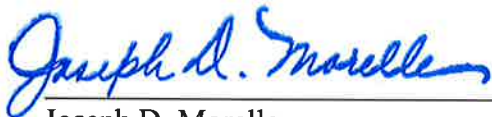
Bobby Rush

  
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Tulsi Gabbard

  
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Jim McGovern

  
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Mike Levin

  
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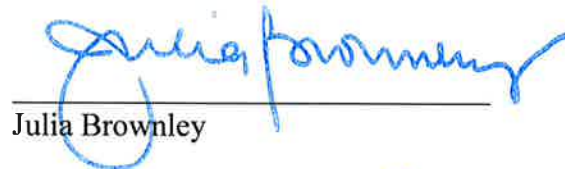
Gil Cisneros



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Chris Pappas



Julia Brownley



Nanette Diaz Barragan



Ann McLane Kuster



Susan Davis



Conor Lamb



Elissa Slotkin



Suzanne Bonamici



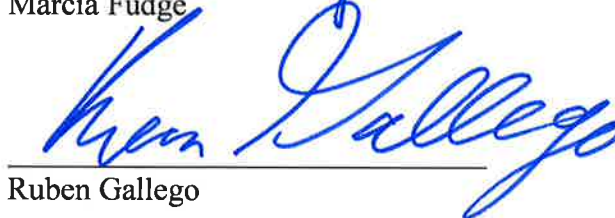
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Marcia Fudge



Kathleen Rice



Ruben Gallego



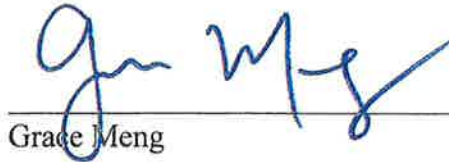
Jim Himes



Dan Kildee



Andy Levin



Grace Meng



Junie Raskin



Mary Gay Scanlon



Debbie Wasserman Schultz



Frank Pallone, Jr.



Ro Khanna



Bennie Thompson



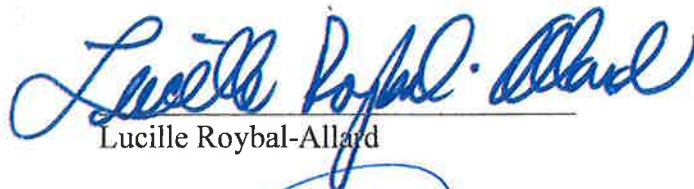
Antonio Delgado



Al Lawson



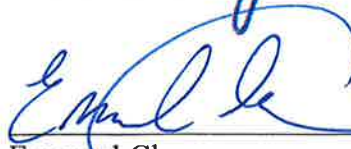
Juan Vargas



Lucille Roybal-Allard



Tony Cárdenas



Emanuel Cleaver



Cheri Bustos



Barbara Lee



Brad Schneider



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