



COUNCIL OF THE DISTRICT OF COLUMBIA
THE JOHN A. WILSON BUILDING
1350 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20004

April 2, 2019

Certification Policy Branch
SNAP Program Development Division
Food and Nutrition Service, USDA
3101 Park Center Drive
Alexandria, Virginia 22302

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

Dear Certification Policy Branch:

As Councilmember and Chair of the Committee on Human Services with oversight of the agency which administers the Supplemental Nutrition Assistance Program (SNAP), I am along with my fellow councilmembers, writing to express my strong opposition to USDA's Proposed Rulemaking on SNAP requirements and services for Able-Bodied Adults Without Dependents (ABAWDs). The proposed rule change would cause severe harm to thousands of Washingtonians who rely on SNAP for their food, would cause undue administrative burdens, and would harm the ability of those who are trying to improve their lives but cannot within an unrealistic 90-day time frame.

Removing the ability of local government to seek a waiver would increase the hardships for unemployed adults, including young adults at the age of 18 who lack the skills or training needed for the job market, and older adults who are unable to actively compete in a younger, experienced workforce.

SNAP Matters for Washingtonians

For thousands of low-income Washingtonians, SNAP is the first line of defense against hunger and a critical program addressing hunger and food insecurity. We know SNAP is meeting an urgent need because of how quickly the benefits are spent. Ninety-seven percent of benefits are redeemed by the end of the month of issuance. This swift use of funds also helps to support our local economy and according to USDA Economic Research Service analysis, every federally funded SNAP dollar generates \$1.79 in economic activity. SNAP helps keep grocery stores open that operate on thinner margins and in turn helps increase access to food for everyone.

This program has been particularly helpful at increasing access to fresh food at the growing number of farmer's markets that accept SNAP benefits. The District has matched some of the federal funding with local dollars so that people are able to have more fresh healthy food. Many of our older residents say



that this program helps to improve the quality of their life and helps foster a sense of community as they gather at the market. It also benefits local farmers who are able to sell their goods.

SNAP Rule Proposal Is Unduly Harsh

Currently, federal law limits SNAP eligibility for underemployed and unemployed adults age 18-50 if they are considered able bodied and without dependents to just three months out of every three years unless they are able to obtain and maintain an average of 20 hours a week of employment. We find this rule to be unduly harsh and unfair as it punishes those who are already vulnerable. Denying food to those who have demonstrated a great and urgent need does not lead to more people being employed or paying taxes. It results in hunger. The SNAP work proposal does not reduce government spending. It merely shifts the burden to charities and local governments like the District.

For years, the District has been granted a waiver of the time limit because of higher unemployment rates or insufficient jobs and it has had the ability to use a pool of exemptions. Nearly every state in the country has requested and received a waiver for the time limit to provide the flexibility needed to best help its residents when they are most vulnerable. This need has not changed.

Proposed Rule Would Not Reduce Unemployment But Does Increase Potential for Harm

We strongly oppose the proposed rule that would expose even more people to hunger by limiting state and local government flexibility regarding area waivers and individual exemptions. This Administration's own calculations reveal 755,000 low-income Americans would lose access to food and it would cut food benefits by \$15 billion over ten years with no improvement in health or decrease of the local unemployment rate.

The proposed rule would make it harder for areas with higher unemployment rates to qualify for time limit waivers. As a body, this government works hard to fund education and job training programs to help all of our residents, but we know there is an educational gap affecting our African-American residents which leads to an opportunity gap and higher unemployment. This city faces persistent higher rates of unemployment in Wards 5, 7, and 8, high rates of unemployment with youth, and with those in African American communities.

Unfortunately, the Department has failed to provide any meaningful analysis to support its conclusions about the impacts the changes would have or realistic plans to avert harm from those changes. The Department admits that it expects two-thirds of those individuals made newly subject to the time limit "would not meet the requirements for failure to engage meaningfully in work or work training."

Although the Department's proposal acknowledges it will "have the potential for disparately impacting certain protected groups due to factors affecting rates of employment of these groups" it leaves it to the Civil Rights Division of the FNS to mitigate its impact and lacks any explanation of strategy to monitor for this impact.

These proposed changes were brought before Congress for inclusion in the 2018 Farm Bill, but Congress rejected these changes and instead left the existing rules governing areas' eligibility for waivers and exemptions in place.

We strongly oppose the proposed rule that would expose our residents to the arbitrary SNAP food cutoff policy, resulting in hunger and harm our community. The previous Congress with the support of the Trump Administration passed a \$1.5 trillion tax cut that largely benefitted the rich. The least the federal government can do for our most vulnerable residents is ensure they don't go hungry.

Sincerely,

Brianne K. Nadeau

Ward 1 Councilmember
Chair of the Committee on Human Services

Phil Mendelson

Chairman
Chair of the Committee of the Whole

Vincent C. Gray

Ward 7 Councilmember
Chair of the Committee on Health

Kenyan R. McDuffie

Ward 5 Councilmember, Chair Pro Tempore
Chair of the Committee on Business and Economic Development

Jack Evans

Ward 2 Councilmember
Chair of the Committee on Finance and Revenue

Mary M. Cheh

Ward 3 Councilmember
Chair of the Committee on Transportation and the Environment

Elissa Silverman

At-Large Councilmember
Chair of the Committee on Labor and Workforce Development

David Grosso

At-Large Councilmember
Chair of the Committee on Education

Robert C. White, Jr.

At-Large Councilmember
Chair of the Committee on Facilities and Procurement

Trayon T. White, Sr.

Ward 8 Councilmember
Chair of the Committee on Recreation and Youth Affairs

Anita D. Bonds

At-Large Councilmember
Chair of the Committee on Housing and Neighborhood Revitalization

Brandon T. Todd

Ward 4 Councilmember
Chair of the Committee on Government Operations

Charles Allen

Ward 6 Councilmember
Chair of the Committee on the Judiciary and Public Safety