

The Food and Nutrition Service of the United States Department of Agriculture is now soliciting public comment on a proposed rule to eliminate current state flexibility administering waivers for Able-Bodied Adults Without Dependents and Supplemental Nutrition Assistance Program eligibility. The Georgia Budget and Policy Institute has a long history of monitoring, reporting and critiquing Georgia's use of a three-month time limit and presented the following comments as part of the official public registry.

April 3, 2018

Ms. Sasha Gersten-Paal
SNAP Program Development Division
Food and Nutrition Service
3101 Park Center Drive
Room 812
Alexandria, VA 22302

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,

Thank you for the opportunity to comment on the United States Department of Agriculture's Advanced Notice on requirements and services for Able-Bodied Adults Without Dependents.

The Georgia Budget and Policy Institute is an independent, nonpartisan, research-based nonprofit founded in 2004. We seek to build an inclusive economy in Georgia where everyone can participate and thrive. GBPI rigorously analyzes budget and tax policies and provides education to inspire informed debate and responsible decision-making, advancing our vision of a state in which economic opportunity and well-being are widely shared among all.

GBPI analysts closely monitor the Supplemental Nutrition Assistance Program (SNAP) because it plays a critical role in addressing hunger and food insecurity for nearly 1.7 million Georgians. In addition, SNAP benefits provide a substantial boost to the state's economy, delivering nearly \$2.54 billion annually in economic impact.

The three-month time limit is worrisome because this policy cuts off food assistance to so many in our community who are in need just because they are unable to find a reliable 20-hour a week job. The time limit already assumes that aid recipients don't work when the reality is that many of them who can work, do work. In Georgia, 44 percent of SNAP recipients work. Those who are not working are often unemployed due to unpredicted job loss, lack of available jobs that pay livable wages, and lack of access to quality training services.

The proposed rule is a misplaced, one-size-fits-all approach that will hamstring the ability of states to tailor ways to most effectively administer the SNAP program and provide aid to residents who fall on hard times. The rule will harm vulnerable people by denying them food benefits at a time when they most need it. Moreover, little evidence exists to show the rule would result in increased employment and earnings.

Nationally, at least 500,000 low income individuals lost SNAP benefits in 2016 after the program imposed time limits. When the time limits expired for several Georgia counties in 2017, an estimated 7,000 Georgians lost access to food assistance, putting their food security at risk, and shifting the burden of providing food to the unemployed from SNAP to local charities such as the Atlanta Community Food Bank network, an organization with whom GBPI regularly partners with, who already struggles to meet demand.

We strongly oppose any administrative action by USDA that would expose more people to this cut-off policy. Under the law, states have the flexibility to waive areas within the state that have experienced elevated unemployment. The rules governing areas' eligibility for waivers have been in place for nearly 20 years and every state except Delaware has availed themselves of waivers at some point since the time limit became law. The waiver rules are reasonable, transparent and manageable for states to operationalize. Any change that would restrict, impede or add uncertainty to our state's current ability to waive areas with elevated unemployment must not be pursued.

The request for comment also seems to suggest that potential improvements to other aspects of the time limit policy, such as individual exemption policy, would justify weakening states' flexibility to waive the time limit in areas with elevated unemployment. This logic is unfounded. Georgia's current ability to exempt certain individuals from the rule is important, but is wholly insufficient to respond to widespread increased need in areas with elevated unemployment. And, the underfunded workforce system and SNAP employment and training programs are not designed or well suited to meet the job training requirements under this rule. Put simply, there is no justification for weakening current waiver rules and exposing more vulnerable people to this SNAP eligibility cut-off.

We encourage USDA to eliminate the proposed time limit rule for Able Bodied Adults Without Dependents. We must protect SNAP's ability to provide food assistance to impoverished unemployed people and ensure it can continue its long legacy of reducing food insecurity among those seeking work and on the path to economic self-sufficiency.

Sincerely,

Jennifer Owens
Deputy Director

If you would like to register your own comments or share a story on the record as a part of this public comment period, please go to: <https://www.federalregister.gov/documents/2018/02/23/2018-03752/supplemental-nutrition-assistance-program-requirements-and-services-for-able-bodied-adults-without>