

Region I Homeless Council

March 28, 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:

We are writing on behalf of the Region I Homeless Council, which voted unanimously to submit public comments in opposition to USDA's Proposed Rulemaking on SNAP requirements and services for Able-Bodied Adults Without Dependents (ABAWDs). Maine's Regional Homeless Council System is divided into three regions. Each Regional Homeless Council meets monthly to discuss the state of homelessness in their respective regions, emerging trends, and to discuss information to be sent to the Statewide Homeless Council (SHC) through regional representation. The Region I Homeless Council covers Cumberland and York counties.

The proposed changes would cause serious harm to people with low-incomes and people experiencing homelessness in Maine and would undermine the ability of low-income Mainers and families throughout the nation to meet their basic nutrition needs.

These proposed rules are also a stark departure from the recently enacted Farm Bill because they will surely limit Mainers' ability to put food on their tables, add costly administrative burdens, worsen health outcomes, and hurt local grocers all across Maine.

SNAP plays a critical role in addressing hunger and food insecurity in our community – particularly for people experiencing homelessness. It is the first line of defense against hunger for people with low incomes, people experiencing homelessness, people with disabilities, seniors, and children. SNAP is our nation's most effective anti-hunger program. When Mainers are able to cover a basic need like putting food on the table, they can get back on their feet more quickly during difficult times. That's how SNAP kept more than 47,000 Mainers out of poverty—including nearly 16,000 children—each year between 2009 and 2012. And, without these essential food benefits, many people who had experienced homelessness but are now housed, would be faced with the awful choice of either paying for food or paying their rent. We should not be injecting instability into the lives of people with demonstrated vulnerability in Maine.

SNAP currently assists one in seven Mainers, 180,000 people—many of whom are people with disabilities, seniors, people experiencing unemployment, people experiencing homelessness, or people who need a little extra help to get by in hard times. Sixty-two percent of Maine SNAP participants live in households with children. SNAP is especially important in Maine given our high rate of food insecurity—Maine is currently seventh highest in food insecurity in the nation. More than one in five Maine children live with food insecurity. Even worse, Maine ranks third from the bottom for very low food security—these are Mainers struggling with chronic hunger.

As such, SNAP is vital to Maine's economy and to the more than 1,500 retailers, including many in rural areas, that participate in the SNAP program. SNAP injects more than \$250 million dollars directly into Maine's economy annually. Based on USDA Economic Research Service analysis, it is estimated that each \$1 in federal SNAP benefits generates \$1.79 in economic activity. Those dollars help many food retailers operating on thin margins to remain in business; something that improves food access for all residents.

The proposed rules would put Maine families and our economy at risk. The rules as written would fundamentally alter SNAP's core purpose to safeguard the nation's health and wellbeing by helping to feed hungry Americans.

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SNAP is a vital part of Maine's social safety net, especially so for people experiencing homelessness and people currently in stable housing who had previously experienced homelessness. SNAP makes it possible for nearly one in seven Mainers to better meet their nutritional needs. SNAP supports hundreds of retailers and strengthens Maine's economy. For all these reasons, we are in strong opposition to these proposed rules.

Thank you for hearing our concerns about hunger in Maine, and how this proposal would worsen food insecurity for Mainers. Below are specific areas about which we're concerned:

- **The proposed rule would limit state flexibility regarding waivers and exemptions, worsening the effect of food benefit time-limits for unemployed and underemployed people who can't document sufficient weekly work hours, cutting off SNAP eligibility after three months.**

Current federal law limits SNAP eligibility for childless unemployed and underemployed adults age 18-50 (except for those who are exempt) 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. This is hard enough. It harms vulnerable people by denying them food benefits at a time when they most need it and it does not result in increased employment and earnings. By time-limiting food assistance to this group, federal law has shifted the burden of providing food to these unemployed individuals from SNAP to states, cities, and local charities. However, under this law, states have some flexibility to ameliorate the impact of the cutoff. They can request a waiver of the time limit for areas within the state that have 10 percent or higher unemployment rates or, based on other economic indicators, have "insufficient jobs." Moreover, states have discretion under current law to exempt individuals from the time limit by utilizing a pool of exemptions (referred to as "15 percent exemptions"). While the 2018 Farm Bill modified the number of exemptions that states can receive each year from 15 percent to 12 percent, it did not change their ability to carry over unused exemptions forward.

In contrast, the proposed rule would limit state flexibility regarding area waivers and individual exemption, and thus would expose even more people to the arbitrary food cutoff policy. By the Administration's own calculations, the proposed rule would take away food from 755,000 low-income Americans, cutting food benefits by \$15 billion over ten years. The Administration does not estimate any improvements in health or employment among the affected population. And, the proposed rule would make it harder for areas with elevated unemployment rates to qualify for waivers of the time limit by adding a 7 percent unemployment rate floor as a condition.

- **The Administration proposed rule seeks to end reauthorization of SNAP in the 2018 Farm Bill and purposely did not make the changes proposed.** The rules governing areas' eligibility for waivers and individual exemptions have been in place for nearly 20 years. In that time, the waiver rules have proven to be reasonable, transparent, and manageable for states to operationalize.

For these reasons, the Region I Homeless Council strongly opposes the rule that would expose even more people in Maine to the arbitrary SNAP cutoff policy and harm communities across our state.

Sincerely,

Jenny Stasio
Region I Co-Chair

Jim Devine
Region I Co-Chair