April 2, 2019

Certification Policy Branch, Program Development Division
Food and Nutrition Service
U.S. Department of Agriculture
3101 Park Center Drive
Alexandria, Virginia 22302

Re: Supplemental Nutrition Assistance Program: Requirements for Able-Bodied Adults Without Dependents, Docket Number FNS-2018-0004

Dear Administrator Lipps:

The National League of Cities (NLC) is the voice of America’s cities, towns and villages, representing more than 280 million people across the country. NLC works to strengthen local leadership, influence federal policy and drive innovative solutions. As such, we appreciate the opportunity to submit these comments on the U.S. Department of Agriculture’s notice of proposed rulemaking to modify waiver standards in the Supplemental Nutrition Assistance Program (SNAP) as it pertains to requirements for able-bodied adults without dependents. We believe that the proposed changes would have a direct negative impact on the economic vitality of our communities, including the health and well-being of residents, and, as such, ask that the proposed rule be withdrawn.

Access to public benefits, including nutrition assistance, provides a critical path towards economic mobility and security for many residents in our communities. While the SNAP program reduces poverty and food insecurity, it also provides for positive health and well-being outcomes for children and families. More broadly, SNAP is an economic stimulus. During our most recent recession in 2009, for every dollar increase in SNAP, $1.70 was generated in economic activity.

As proposed, the current rule would negatively impact residents in cities, towns and villages across the country who depend on SNAP benefits for financial stability. While there remains concern about maintaining jobs and hours during challenging economic times, even during strong economic times documenting work can be a roadblock towards receiving benefits. While this process may appear straightforward, countless individuals who receive SNAP benefits do so with temporary employment status and/or possess barriers to maintaining work such as,

1 https://www.cbpp.org/research/snap-is-effective-and-efficient
low educational attainment, criminal justice histories and caregiving challenges.\(^2\) There are also significant challenges in meeting the work requirements through volunteerism because documentation of what counts, who verifies it at the state level and how are all unclear. Should this proposed rule move forward, these restrictions would impede an individual’s ability to reach their full economic potential, place strain on local food pantries and cause long-lasting harm to local economies, including impacts on local grocery stores.

The budget of any city is impacted by the financial stability of their residents.\(^3\) Decreasing SNAP benefits for working adults or those who are searching for employment will impact a city’s financial viability. The proposed rule would burden a city’s municipal courts budget, strain nonprofit providers’ ability to address issues within their community by increasing their caseloads and most importantly decrease the ability of families to stay financially stable. Individuals that would be impacted are often in under-skilled positions that do not offer consistency in scheduled work hours. By linking SNAP eligibility with employment, the proposed rule would further erode the financial stability of those who are already the most economically vulnerable. Not only would the proposed rule negatively impact residents, it would also reduce the ability of cities to address the needs of their communities through investments and essential services.

We thank you for the opportunity to offer comment and look forward to continuing to work together on federal policies and programs that help cities and towns grow their economies and protect the health and well-being of residents. If you have questions about the information provided, please do not hesitate to contact me or Stephanie Martinez-Ruckman, Program Director for Human Development at martinez-ruckman@nlc.org or 202-626-3098.

Sincerely,  

Clarence E. Anthony  
CEO and Executive Director

\(^3\) https://www.urban.org/urban-wire/financially-insecure-residents-can-cost-cities-millions