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Submitted via www.regulations.gov

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

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

Dear Certification Policy Branch:

Connecticut Voices for Children appreciates this opportunity to comment in opposition to the United States Department of Agriculture's Proposed Rulemaking on SNAP requirements and services for Able-Bodied Adults Without Dependents (ABAWDs). The proposed changes would deprive thousands of access to adequate food.

Connecticut Voices for Children is a research-based child advocacy organization working to ensure that all Connecticut children have an equitable opportunity to achieve their full potential. While ABAWD requirements do not directly affect children, we are concerned about the potential impact of these rules on young adults and on families that include members who fall into this category.

In 2018, Over 490,000 Connecticut residents participated in SNAP. About 45 percent of these residents are younger than 18 or older than 65. SNAP participants are already subject to strict time limits and work requirements. In 2017, the Connecticut Department of Social Services reported that 40 percent of SNAP recipients live in working families. National data suggests that many more (over 80 percent) work in the year before or after utilizing SNAP. In other words, SNAP is a stopgap during periods of temporary unemployment. The average benefit in Connecticut is just \$130 per month—a supplement rather than an amount adequate to feed someone with no other resources. Further, SNAP is designed to taper down as earnings increase, meaning there is no potential disincentive to seeking work related to a “benefit cliff.”

SNAP provides for the basic needs of our state's residents and simultaneously benefits our state economy. USDA Economic Research Service analysis suggests that each \$1 in federal SNAP benefits generates \$1.79 in economic activity. The small state of Connecticut has 2,600 participating retailers.

When strict time limits are imposed on SNAP participants who are unable to find work, these Connecticut residents must turn to municipalities, food banks, and local nonprofits to meet their needs. Current law and regulations allow states to ameliorate that burden by requesting a waiver on the benefit cap of three months of participation in three years when unemployment rates are high or economic indicators suggest that jobs simply are not available in a given area. This allow states the flexibility to avoid unnecessary administrative burdens, simplify the SNAP enrollment and renewal processes, and ensure that more of the state's residents have access to adequate nutrition.

At the end of 2018, Congress considered and rejected numerous restrictions to the SNAP program including proposed changes to the area waiver rules and individual exemptions. These proposed changes discard the careful consideration of our elected representatives and alter rules that have been in place for nearly two decades. In addition, implementing these changes would burden our state with additional administrative costs at a time when Connecticut is experiencing a fiscal crisis and lean state agency staffing.

Connecticut Voices for Children opposes the proposed rule because its sole result would be to deprive residents of our state of access to basic nutrition while providing none of the supposed benefits such as improvements in the economy or employment rates.

Sincerely,



Sharon Langer, J.D.
Interim Executive Director



Karen Siegel, M.P.H.
Health Policy Fellow