

March 29, 2019

Secretary Sonny Perdue  
United States Department of Agriculture  
1400 Independence Ave., S.W.  
Washington, D.C. 20250

Re: Supplemental Nutrition Assistance Program: Requirements for Able-Bodied Adults  
Without Dependents RIN 0584-AE57

Dear Secretary Perdue:

Thank you for the opportunity to comment on the United States Department of Agriculture's proposed change to the existing Supplemental Nutrition Assistance Program (SNAP) time-limit waiver rule.

Policy Matters Ohio is a nonprofit, nonpartisan Ohio-based research institute. Our research demonstrates how policies can make Ohio's economy work for everyone, from business owners to minimum wage workers. For that reason, we oppose restricting state ability to provide food aid to unemployed and underemployed childless adults living in distressed areas with limited job opportunities. SNAP participants aged 18-49 who are not raising minor children are extremely poor. Nationally, 70 percent of people subject to the SNAP time limit earn less than \$6,245 a year. Their average income is even lower: just \$3,900 per year while they participate in SNAP.<sup>1</sup> This proposal would disproportionately harm people of color, people without high school diplomas and people with disabilities who all have unemployment rates higher than geographic averages. The U.S. Department of Agriculture (USDA) should not make it harder for low-income people to access food. Waivers are an important policy option for states to reduce hunger in distressed areas. They should not be used to create more barriers.

### **Workers in Ohio would be harmed by the proposed rule**

The proposed rule changes would hurt Ohioans struggling to find work in a challenging labor market. Current federal SNAP law limits benefits to three months out of a 36-month period for childless, non-elderly, able-bodied adults who work less than 20 hours per week. The law allows states to waive these limits for people in a city or area with high unemployment. Four kinds of communities now qualify for the waiver: Those categorized as "labor surplus areas" by the U.S. Department of Labor; those with an unemployment rate 20 percent higher than the nation's over a recent 24-month period; those with a recent unemployment rate above 10 percent; or those qualifying for extended unemployment benefits.<sup>2</sup> For the period between October 2018 and September 2019, Ohio has waived 38 counties that have had unemployment rates 20 percent higher than the national unemployment rate. In the current waiver period, Ohio waived 12 additional counties because the state's job market worsened relative the nation.

Under the proposed rule, Ohio's method for determining waivers would be restricted and the state would be less able to provide relief from the time limit. The proposed change would require areas to have at least a 7 percent unemployment rate before the 20 percent rule could be applied. This would dramatically cut the number of eligible Ohio counties.

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<sup>1</sup> Unemployed Adults without Children Who Need Help Buying Food Only Get SNAP for Three Months" (Center on Budget and Policy Priorities, October 20, 2016), <https://www.cbpp.org/unemployed-adults-without-children-who-need-help-buying-food-only-get-snap-for-three-months>.

<sup>2</sup> USDA Food and Nutrition Service, "ABAWD Waivers," March 15, 2019, <https://www.fns.usda.gov/snap/abawd-waivers>.

Eliminating labor surplus areas as a criterion could also harm future waiver requests for Ohio. For 2018-2019, Ohio had 43 designated labor surplus areas.<sup>3</sup>

Just this month, more than 1,600 Ohioans lost their jobs when General Motors closed the Lordstown plant, which produced the Chevy Cruze. Three Lordstown suppliers, employing 750 people, have announced mass layoffs as a result.<sup>4</sup> The plant is in Trumbull County, which receives a waiver. Surrounding counties, where former employees may live, are also waived: Carroll, Columbiana, Cuyahoga, Jefferson, Mahoning, and Ashtabula.<sup>5</sup> Former Lordstown employees without minor children can put food on the table even if they cannot find work in three months, because they are waived from this harsh time limit. Trumbull County's current unemployment rate is not high enough (yet) to meet the 7 percent threshold in the proposed rule.<sup>6</sup> Under the proposed rule, these former Lordstown employees who struggle to find work would be barred from receiving food aid.

### **Overall unemployment rates obscure joblessness**

Overall unemployment rates are averages that mask demographic variation. Marginalized groups often have higher unemployment rates than official averages for geographic areas. In particular, people with less than a high school diploma, African Americans, Latinos and people with disabilities have higher unemployment rates. In Ohio, the 2017 unemployment rate for black Ohioans was more than twice the rate for white Ohioans: 10.2 percent compared to 4.3 percent for whites.<sup>7</sup> The unemployment rate for Ohio's Latino population was 7.2 percent. Longstanding and current racial discrimination in employment has led to higher unemployment rates among people of color both in Ohio and nationally.<sup>8</sup> People without a high school diploma consistently have higher than average unemployment rates. In 2017, Ohio's overall unemployment rate was 5.2 percent but it was 11.3 percent for people with disabilities and 11.8 percent for people without a high school diploma.<sup>9</sup> In many metropolitan areas across the nation, overall unemployment rates are below 7 percent (the proposed new threshold), but unemployment rates for African Americans, Latinos, people without high school diplomas, and people with disabilities are more than double. That's the case in five Ohio metro areas: Canton-Massillon, Youngstown-Warren-Boardman, Cincinnati, Huntington-Ashland, and Wheeling.<sup>10</sup>

### **Ohio's economy could be harmed if waivers are restricted**

Further restricting waiver eligibility would harm communities that have high unemployment but do not meet the proposed harsher requirements. Waivers boost the economy in struggling areas because unemployed workers who participate in SNAP can continue to shop at local grocery stores. In 2016, 9,644 retailers redeemed over \$2.4 billion in SNAP benefits.<sup>11</sup> In 2013, the Kasich Administration denied waivers to 72 qualifying counties in Ohio.<sup>12</sup> The rollback cost Ohio's economy \$464 million in SNAP benefits that would have gone to

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<sup>3</sup> U.S. Department of Labor, "Description of Labor Surplus Area," October 5, 2018, <https://www.doleta.gov/lisa/about.cfm>.

<sup>4</sup> Michael Shields, "Lordstown Closure: Better Policies Can Help Displaced Workers, Avert Future Closures" (Policy Matters Ohio, March 13, 2019), <https://www.policymattersohio.org/research-policy/fair-economy/work-wages/collective-bargaining/lordstown-closure-better-policies-can-help-displaced-workers-avert-future-closures>.

<sup>5</sup> Ohio Department of Job and Family Services, "Family Assistance Letter #171 Federal Fiscal Year 2019: Able-Bodied Adults without Dependents," September 7, 2018.

<sup>6</sup> U.S. Census Bureau, 2017 American Community Survey 1-Year Estimates

<sup>7</sup> U.S. Census Bureau, 2017 American Community Survey 1-Year Estimates

<sup>8</sup> Lincoln Quillian et al., "Hiring Discrimination Against Black Americans Hasn't Declined in 25 Years," Harvard Business Review, October 11, 2017, <https://hbr.org/2017/10/hiring-discrimination-against-black-americans-hasnt-declined-in-25-years>.

<sup>9</sup> U.S. Census Bureau, 2017 American Community Survey 1-Year Estimates

<sup>10</sup> U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates

<sup>11</sup> Jackson, Victoria. "SNAP Feeds Ohio." Policy Matters Ohio. Accessed April 3, 2018. <https://bit.ly/2HmEFvV>

<sup>12</sup> Wendy Patton and Kenza Kamal, "Ohio Should Expand Use of Federal Waiver of SNAP Time Limits in 2017" (Policy Matters Ohio, July 2016), <http://www.policymattersohio.org/wp-content/uploads/2016/06/Waiver-2016.pdf>.

businesses that support jobs and local economies.<sup>13</sup> As a result, Vinton County, a poor rural community, lost its only grocery store. Vinton was not the only rural county to experience this loss.<sup>14</sup>

### **The phrase “able-bodied” is not informative**

Able-bodied adults without dependents sounds descriptive but is not. Many people so labeled have mental and physical disabilities, have children who are not in their custody, or are taking care of elderly or disabled family members. A study of participants in Ohio Association of Foodbanks’ Work Experience Program in Franklin County found 30.8 percent of clients reported having a physical or mental health limitation despite being categorized as “able-bodied.” Despite being labeled as “without dependents,” 24.4 percent of clients reported having children not in their custody and 13 percent are caregivers for a parent, relative, or friend. These adults also face other obstacles that make it difficult for them to find work and stay employed. For instance, 30 percent of the clients surveyed in the study had no high school diploma or GED.<sup>15</sup> Despite these challenges most adults in this category were working.

### **Work requirement don’t improve long-term employment**

Adult participants without children in their custody are already required to work. Research shows imposing harsher work requirements will not improve this group’s economic mobility or long-term employment. The Center on Budget and Policy Priorities found work requirements for people with cash assistance are largely ineffective at reducing poverty or increasing long-term employment. Cash assistance recipients not subject to work requirements had the same or better employment outcomes than those required to work. An analysis that compared outcomes for cash assistance recipients in Columbus, Ohio found a statistically insignificant difference in employment for those with and without work requirements. One or two years later, participants subject to work requirements had only a 1.7 percent higher rate of working. After five years, the difference was only 0.3 percent.<sup>16</sup> Additionally, research shows people with significant barriers to employment, such as lack of transportation, ultimately do not find work.<sup>17</sup> For SNAP participants who face significant barriers, harsher work requirements will not help them become employed and move out of poverty, but it will reduce their access to food.

### **SNAP reduces poverty and improves health**

SNAP is the nation’s largest and most effective anti-hunger program. With 13.7 percent of households experiencing food insecurity, Ohio ranks 40<sup>th</sup> among the states and District of Columbia.<sup>18</sup> Federal food aid keeps over 1.4 million Ohioans in over 700,000 households fed.<sup>19</sup> Two-thirds of recipients are people we do not expect to work: 42 percent are children, 11 percent are elderly and 13 percent are adults with disabilities.<sup>20</sup> Able-bodied adults comprise 34 percent. Of those, many are taking care of minor children or people with disabilities. The vast majority of able-bodied adults without dependents who receive SNAP work.

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<sup>13</sup> Ohio House of Representatives Minority Caucus, “Ramos, Advocates Call For End To Gov. Kasich’s Restrictions On Food Access | Minority Caucus | The Ohio House of Representatives,” Minority Caucus Blog (blog), October 13, 2015, <http://www.ohiohouse.gov/democrats/press/ramos-advocates-call-for-end-to-gov-kasichs-restrictions-on-food-access>.

<sup>14</sup> Mary Beth Lane, “Loss of Only Grocer Hurts Rural Vinton County - News - The Columbus Dispatch - Columbus, OH,” The Columbus Dispatch, accessed March 25, 2019, <https://www.dispatch.com/article/20140209/NEWS/302099932>.

<sup>15</sup> “A Comprehensive Assessment of Able-Bodied Adults without Dependents and Their Participation in the Work Experience Program in Franklin County, Ohio.” Ohio Association of Food Banks, 2015. <https://bit.ly/2EvAhgK>

<sup>16</sup> LaDonna Pavetii, “Work Requirements Don’t Cut Poverty, Evidence Shows” (Center on Budget and Policy Priorities, June 6, 2016), <https://bit.ly/2tH7Vpy>

<sup>17</sup> Ibid.

<sup>18</sup> Alisha Coleman-Jensen et al., “Household Food Security in the United States in 2016” (United States Department of Agriculture, September 2017), <https://bit.ly/2w1FmLJ>

<sup>19</sup> Public Assistance Monthly Statistics Report.” Ohio Department of Job and Family Services, January 2018. <https://bit.ly/2IHBOIL>

<sup>20</sup> Jackson, Victoria. “SNAP Feeds Ohio.” Policy Matters Ohio. Accessed April 3, 2018. <https://bit.ly/2JcMFQK>

SNAP reduces poverty and improves health. SNAP kept 419,000 people in Ohio out of poverty a year from 2009 to 2013.<sup>21</sup> Medical costs for low-income adult SNAP participants are about 25 percent less per year than low-income adult non-SNAP participants.<sup>22</sup> The difference is even greater for those with hypertension and coronary heart disease.

### **Conclusion**

Most SNAP recipients who can work, do. The program is a proven tool to help people stay on their feet and make positive contributions to their employers, communities and the broader economy. At least a quarter of households with childless adults include members who are working while receiving SNAP, and about 75 percent work in the year before or after receiving SNAP.<sup>23</sup> Many recipients cycle through periods of work and unemployment, while others have multiple odd jobs to afford daily necessities but still do not work enough hours to meet program requirements.

The USDA should exercise caution and reject any abrupt, counterproductive changes to the SNAP program's existing waiver rules. Childless adults on SNAP in Ohio face a wide range of social and economic barriers, and they are at a higher risk of hunger. The waivers available today play a crucial role in helping them navigate those obstacles and afford the basics they need to live a decent and dignified life.

Sincerely,



Amy Hanauer  
Executive Director

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<sup>21</sup> Nchako, Caitlin, and Lexin Cai. "A Closer Look at Who Benefits from SNAP: State-by-State Fact Sheets." Center on Budget and Policy Priorities, January 14, 2013. <https://bit.ly/2uYt6sq>

<sup>22</sup> Carlson, Steven, and Brynne Keith-Jennings. "SNAP Is Linked with Improved Nutritional Outcomes and Lower Health Care Costs." Center on Budget and Policy Priorities, January 16, 2018. <https://bit.ly/2DJqg23>

<sup>23</sup> Ibid.