



June 13, 2024

State Administration Branch
Program Accountability and Administration Division
Supplemental Nutrition Assistance Program
USDA Food and Nutrition Service
1320 Braddock Place, 5th Floor
Alexandria, Virginia 22314
Submitted at regulations.gov and via email at: SM.FN.SNAPSAB@usda.gov

Re: Supplemental Nutrition Assistance Program: Program Purpose and Work Requirement Provisions of the Fiscal Responsibility Act of 2023 -- [FNS 2023–0058] -- RIN 0584–AF01

To Whom It May Concern,

Please consider the following comments regarding USDA's proposed rule on the Supplemental Nutrition Assistance Program (SNAP) related to the changes made through the Fiscal Responsibility Act of 2023.

The Alliance to End Hunger unites a diverse multi-sector coalition of corporations, nonprofits, faith networks, universities, health care providers, foundations, and individuals to address domestic and international hunger and malnutrition needs. Given SNAP's long-proven food security and poverty-reduction impacts, protecting access to SNAP is a continuing and critical goal of our coalition.

On behalf of the Alliance to End Hunger, I am specifically writing to object to updating the purpose of SNAP to "assist low-income adults in obtaining employment and increasing their earnings." SNAP is first and foremost a food security program, and this additional intent is not consistent with the fundamental purpose of SNAP.

In FY22, SNAP provided over 41 million individuals with access to food in a way that protects their dignity and enhances normal channels of commerce. With a modest benefit, SNAP reduces food insecurity by 1/5 among participating households and 1/3 among children. In 2022 SNAP lifted 3.7 million people out of poverty by buttressing them with support during hard times, not through employment support.

Adding employment as a purpose of SNAP is misguided. Most SNAP recipients are not eligible to work, as according to USDA 79 percent of SNAP households include either a child, an elderly individual, or a nonelderly individual with a disability. Additionally, most of the SNAP participants who *can* work *are* working. Less than 10 percent of SNAP participants are unemployed and looking for work.

Unfortunately, SNAP's track record in helping to facilitate meaningful employment has been unsuccessful. Additionally, current work requirements have served to increase food insecurity among the unemployed through stringent time limits.

Research suggests that SNAP work requirements do not incentivize work but increase food hardship. In a 2021 Urban Institute study of time limit reinstatement in nine states, researchers found that stringent work requirements did not impact earnings or employment opportunities but did make it more difficult for participants to access benefits.ⁱ In addition to work requirements not having been shown to increase work for those on SNAP, research shows that eligible participants are more likely to leave the program or not sign up when eligibleⁱⁱ and when they leave the program, they are more likely to experience increased food insecurity and rely more heavily on emergency food assistance.^{iii,iv}

For participants who work, SNAP's purpose should be to support individuals who are in between jobs to meet basic needs so that they can successfully find work. Current work requirements should be updated to better reflect the



realities of low-wage labor markets. Low-wage work is characterized by not just low pay, but also unstable schedules and lack of benefits. There are opportunities to better-invest in ensuring that SNAP participants in the low-wage labor market have the skills and training to obtain living-wage employment through the voluntary SNAP Employment and Training (SNAP E&T) program. Additionally, USDA should better align with voluntary workforce development opportunities to assess barriers to employment and offer training.

By including a work purpose intent, SNAP participants would experience hardships in applying and keeping their SNAP benefits, increasing their risk of falling deeper into food insecurity and poverty. Work requirements have been premised on the assumption that people do not want to work and should be mandated to do so through public policy. The reality is that the majority of SNAP participants who *can* work, *do* work.

The Alliance supports all low-income individuals being able to access nutrition assistance through SNAP regardless of their ability to obtain and/or prove employment. Broader policies should aim to reduce insecure employment, raise minimum wages, and close employment and pay gaps in our nation rather than imposing more requirements on SNAP recipients. Addressing these root causes of hunger would go much further in reducing demand for SNAP.

Sincerely,

Minerva Delgado

Director of Coalitions & Advocacy
Alliance to End Hunger

ⁱ Wheaton, Laura, et al, “The Impact of SNAP Able-Bodied Adults Without Dependents (ABAWD) Time Limit Reinstatement in Nine States,” Urban Institute, June 2021, https://www.urban.org/sites/default/files/publication/104451/the-impact-of-snap-able-bodied-adults-withoutdependents-abawd-time-limit-reinstatement-in-nin_0.pdf.

ⁱⁱ Gray et al, 2023 <https://doi.org/10.1257/pol.20200561> and Cuffey et al, 2022 <https://doi.org/10.1111/ajae.12207>

ⁱⁱⁱ Cuffey et al, 2023 <https://doi.org/10.1016/j.amepre.2023.01.029>

^{iv} Gray et al., “Employed in a SNAP? The Impact of Work Requirements on Program Participation and Labor Supply,” National Bureau of Economic Research, (June 2021), <https://www.aeaweb.org/articles?id=10.1257/pol.20200561>