



NARC
Building Regional Communities

National Association of Regional Councils

660 North Capitol Street NW, Suite 440

Washington, DC 20001

202.986.1032

www.NARC.org

April 9, 2018

Ms. Sasha Gersten-Paal
SNAP Program Development Division
Food and Nutrition Service
3101 Park Center Drive
Room 812
Alexandria, VA 22302

RE: *Advanced Notice of Proposed Rulemaking: Supplemental Nutrition Assistance Program: Requirements and Services for Able-Bodied Adults Without Dependents RIN 0584-AE57*

Dear Ms. Gersten-Paal:

Thank you for the opportunity to comment on USDA's Advanced Notice on requirements and services for Able-Bodied Adults Without Dependents (ABAWDs).

The National Association of Regional Councils (NARC) is a recognized authority and leading advocate for regional organizations and solutions that positively impact American communities through effective inter-jurisdictional cooperation. Our mission is to shape federal policy that recognizes the increased value of local intergovernmental cooperation; advocate effectively for the role of regional councils in the coordination, planning, and delivery of current and future federal programs; provide research and analysis of key national issues and developments that impact our members; and offer high quality learning and networking opportunities for regional organization through events, training, and technical assistance.

The Supplemental Nutrition Assistance Program (SNAP) is the first line of defense against hunger for most of our members' low-income residents. In our experience, we have seen the federal three-month time limit cut off food assistance for many residents because they are unable to find a reliable 20 hour per week job. We believe this rule is harsh and unfair. It harms vulnerable people by denying them food benefits at a time when they need it most. At least 500,000 low-income individuals nationwide lost SNAP in 2016 due to the time limit, putting their food security at risk.

By reducing state flexibility to waive the current time-limiting SNAP, federal law will further shift the burden of providing food to these unemployed individuals from SNAP to our regions, cities, counties, and local charities. Local governments and nonprofits would have to use more of their limited local funds and resources to provide a safety net for those that time out of the SNAP program. Especially for small jurisdictions or rural communities with smaller pools of local tax dollars, trying to find additional means to feed these individuals may prove to be a difficult challenge. This could yield great consequences especially in times where communities are facing extraordinary circumstances, including bad economic conditions or natural disasters.

State and local leaders have been working hard over the past several years to engage SNAP participants in adult and postsecondary education and workforce development programs, helping them build the skillsets needed for stable employment opportunities. However, when SNAP recipients are timed out of their benefits, their focus shifts from learning new skills and finding employment to worrying about where their next meal is coming from. This makes it more difficult for local leaders to keep these former SNAP recipients engaged in programs that will help them find more stable employment long-term.

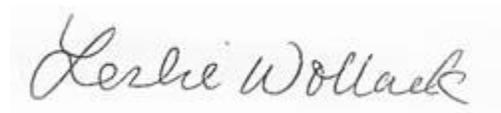
NARC and its members are concerned that the proposed rulemaking will make the time limit rule stricter than it already is by expanding the scope of the cutoff and eliminating the little flexibility states have to limit the damage of the rule. We are deeply concerned that any changes to the current rule will increase the negative impacts of this rule, food insecurity, and hunger.

NARC and its members strongly oppose any administrative action by USDA that would expose more people to this SNAP cutoff policy. Under the law, states have the flexibility to waive these cutoff policies in regions that have experienced elevated unemployment. The rules governing a regions' eligibility for waivers have been in place for nearly 20 years, and every state except Delaware has used this waiver authority at some point since the time limit became law. The waiver rules are reasonable, transparent, and manageable for states to operationalize. Any change that would restrict, impede, or add uncertainty to our state's current ability to waive areas with elevated unemployment must not be pursued.

NARC and its members urge the USDA to eliminate any proposal that would limit the amount of time Able-Bodied Adults Without Dependents can receive SNAP benefits. Restoring SNAP's ability to provide food assistance to impoverished unemployed people would be a powerful policy improvement that would reduce food insecurity among those actively seeking work.

Thank you again for this opportunity to comment on the Advanced Notice of Proposed Rulemaking. Please do not hesitate to reach out to me for additional information.

Sincerely yours,

A handwritten signature in cursive script that reads "Leslie Wollack". The signature is written in dark ink on a light-colored background.

Leslie Wollack
Executive Director