

April 2, 2019

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

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

Dear Certification Policy Branch:

I am writing on behalf of RESULTS to comment in opposition to USDA's Proposed Rulemaking on SNAP requirements and services for Able-Bodied Adults Without Dependents (ABAWDs). As an anti-poverty organization, we are deeply concerned about the proposed rule's potential harm to low-income Americans – we know that access to health care, nutrition assistance, housing programs, and other critical supports is critical in efforts to end poverty. We urge that the rule be withdrawn, mirroring Congress's intent in overwhelmingly passing a bipartisan Farm Bill that rejected these proposed changes

RESULTS creates the public and political will to end poverty by empowering individuals to exercise their personal and political power for change. We support a network of more than 115 chapters with over 650 active volunteers (and an additional 7,000 members in our e-mail action network) across the U.S. Our grassroots educate members of congress, work with the media, and build awareness within their communities on basic nutrition and health programs along with budget and tax policies. Our grassroots network includes a specific focus on engaging young leaders and elevating the voices of low-income Americans who have firsthand experience of poverty.

In 2017, almost one in six households with children in the U.S. were food insecure (USDA). Studies show that children who are regularly hungry suffer from weakened immune systems, slowed and abnormal growth, and young children from food-insecure households are two-thirds more likely to be at risk of developmental problems, while early access to SNAP can improve birth outcomes and long-term health along with children's economic well-being as adults.

SNAP is the cornerstone in the fight against hunger in America – it is timely, targeted, and incredibly effective, especially during economic crises or natural disasters. The Census Bureau estimates SNAP lifted 3.4 million people above the poverty line in 2017. SNAP plays a critical role in helping families get ahead when times are tough or wages aren't enough, while also supporting local economies.

SNAP and other programs provide a crucial, often temporary, support for those struggling to make ends meet in low-wage jobs, work irregular hours, or are striving to find work. RESULTS strongly opposes efforts to take food away from Americans struggling to make ends meet through harmful changes to SNAP, including expanding SNAP's existing tough work requirements or attacking state flexibility to meet the needs of working families – which will deepen the “cliff effect” and penalize families for building savings.

**The proposed rule is an overreach given Congressional intent and undechalls the effectiveness of anti-poverty programs.** Our advocates know – many from lived experience – the importance of accessing basic nutrition assistance and feel strongly that we must protect and expand effective anti- poverty policies.

This proposal can also have an impact on the children of non-custodial parents. Children's well-being is inseparable from their parents' and families' well-being, so help received by parents is central to children's health and well-being in the short- and long-term. Children thrive when their parents can access needed health or mental health care, when their families have enough to eat, and a roof over their heads. Conversely, parents' stress and health challenges impede effective caregiving and can undermine children's development.

As an organization deeply committed to ending poverty and creating opportunity, with a focus on understanding the root causes of racial wealth inequality, **RESULTS is deeply concerned about the impact of the proposed changes on people and communities of color.** Rather than evidence-based policymaking, the proposed rule would cause great harm to individuals, families, and communities, without a full rationale or quantification of the potential harm. .

RESULTS believes that taking away food from people who need it is wrong, no matter what. The administration must reverse this harmful and inhumane policy. The Department should immediately withdraw this proposal, and dedicate its efforts to advancing policies that strengthen—rather than undermine—the ability of people to support themselves and their families in the future.

Thank you for the opportunity to submit comments on the proposed rulemaking. Please do not hesitate to contact me to provide further information.

Sincerely,



Meredith Dodson  
Director of U.S. Poverty Campaigns  
RESULTS  
1101 15th Street NW Suite 1200  
Washington, DC 20005  
(202) 783-7100 x116  
mdodson@results.org  
<http://www.results.org/>