



Proposed SNAP Rule Would Decrease State Flexibility, Harm Local Economies, and Increase Hunger

On February 1, USDA published a [Proposed Rule on the Supplemental Nutrition Assistance Program \(SNAP\): Requirements for Able-Bodied Adults without Dependents RIN 0584-AE57](#). That rule, if adopted, would make changes to SNAP that Congress specifically declined to make in the recently enacted 2018 Farm Bill. The proposed changes would decrease state flexibility, harm local economies, and increase hunger. They should be rejected.

Current Federal Law

Since 1996, federal law has limited SNAP benefits for certain childless unemployed and underemployed adults age 18–50 (except for those who are exempt) to just three months out of every three years, unless they are able to obtain, maintain, and document an average of 20 hours a week of employment.

Under the law, states have some flexibility to ameliorate the impact of the cutoff.

- First, states can request a waiver of the time limit for areas within the state that have 10 percent or higher unemployment rates, or, based on other specified economic indicators, have “insufficient jobs.”
- Second, states have discretion to exempt a portion of affected individuals from the time limit by using a pool of exemptions (referred to as “15 percent exemptions”). While the 2018 Farm Bill modified the number of exemptions that states can receive each year from 15 percent to 12 percent, it did not change their ability to carry forward unused exemptions.

Proposed Changes

The proposed rule would take away state flexibility and make it much harder for states to serve the target population.

First, it would make it harder for areas with elevated unemployment rates to qualify for waivers of the time limit

- by adding a 7 percent unemployment rate floor as a condition;
- by dropping statewide waivers except when a state triggers extended benefits under Unemployment Insurance; and
- by unduly limiting the economic factors considered in assessing an area’s eligibility for a waiver.

Second, the proposed rule would remove states’ ability to use exemptions accumulated prior to the rule’s implementation, as well as limit the time states have to use the exemptions they receive in the future.

Estimated Impacts

According to USDA’s own analysis, the proposed rule would eliminate SNAP eligibility for 755,000 low-income adults, and, over 10 years, take away \$15 billion in SNAP food benefits. This is the equivalent of more than 8.5 billion meals taken from the plates of individuals. The Trump Administration expects that two-thirds of those adults newly subject to the time limit would not be sufficiently engaged in work or training-related activities to comply with the rule.

Resources to Assist Constituents in Commenting

FRAC and Feeding America have web-based platforms that provide information and resources to facilitate the submission of comments on the proposed rule. The deadline to submit a comment is April 2, 2019.

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Web-based Platforms:

FRAC — www.frac.org/timelimitcomments
Feeding America — <http://bit.ly/FASNAPComments>
or <http://bit.ly/FAUSDAComments>