COLORADO CHILDREN'S CAMPAIGN
Every Chance for Every Child

April 6, 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 Colorado Children's Campaign is a policy research and advocacy organization that believes in data-driven public policy that improves child well-being. Our mission is to advocate for every chance for every child, focusing on three key areas: health, education and early childhood. In doing so, Colorado Children's Campaign pays close attention to the Supplemental Nutrition Assistance Program (SNAP) because it is a critical program in addressing hunger and food insecurity across Colorado, and is the first line of defense against hunger for most low-income kids and their families in Colorado. The Colorado Children's Campaign strongly opposes any changes to SNAP regulations that further limit access, increase work requirements, or reduce state flexibility as these changes are bad for children.

SNAP is a crucial program for fighting food insecurity among Coloradans. Food insecurity is already too common among Colorado's kids, with one in seven children in Colorado facing food insecurity at some point during the year and 14 percent of high school students reporting that they went hungry at some point in the last 30 days due to a lack of food at home. SNAP benefits are crucial for a child's academic engagement, socio-behavioral competence, and overall health. A recent study[1] found that children performed better in school when they receive additional access to healthy food. Other studies also show that students have fewer behavioral problems[2] and are healthier[3] when they have food security.

Current federal law, which limits the length of time an adult without children can receive benefits, is already bad for kids. Adults who are between the ages of 18-50 and without children are restricted to three months of SNAP benefits in three years if they cannot maintain 20 hours of work a week. This law inadvertently harms children living in poverty because they often depend on pooled resources (including SNAP benefits) from extended family members. Additional restrictions on SNAP eligibility for adults

[1] Anna Gassman-Pines, "Food Instability and Academic Achievement: A Quasi-Experiment Using SNAP Benefit Timing," http://journals.sagepub.com/doi/full/10.3102/0002831218761337
[2] Lisa Gennetian, "Supplemental Nutrition Assistance Program (SNAP) Benefit Cycles and Student Disciplinary Infractions," https://www.journals.uchicago.edu/doi/abs/10.1086/688074?journalCode=ssr&
[3] Hillary Hoynes, "Long-Run Impacts of Childhood Access to the Safety Net," https://www.aeaweb.org/articles?id=10.1257/aer.20130375

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means fewer resources to support the health and well-being of those children. Likewise, if time-limits are shortened, it would be particularly harmful to young people aging out of foster care – a population that already experiences multiple barriers to health and successfully transitioning to adulthood due to high rates of unemployment and poverty. Lastly, ensuring that women are healthy and well-nourished before they become pregnant is a key way to improve the health of their children.

Most families who receive SNAP benefits are already working. Adding work requirements to public assistance programs advances a false narrative about Coloradans living in poverty. Work requirements rest on the biased assumption that our neighbors who face the greatest barriers to secure employment will work only if they're forced to do so. In reality, Coloradans living below the poverty line work hard to support themselves and their families. They are often employed in multiple jobs with unpredictable hours, earning wages that are insufficient to put food on the table, cover the cost of rent and utilities, and pay for doctor's visits without publically-funded support. Research shows that harsh work requirements do little to move long-term unemployed participants into the work force. In fact, work requirements in other programs have caused many families who face multiple barriers to lose assistance, leaving them in deep poverty. Imposing stricter work requirements such as raising the age to which work requirements apply will jeopardize the health and well-being of hundreds of thousands of children nationwide.

Eliminating states' ability to apply for waivers for those who live in high unemployment areas would exacerbate food and health disparities for low-income adults and children across the nation. The rules governing areas' eligibility for waivers have been in place for nearly 20 years and every state except Delaware uses waivers. Current waiver rules are reasonable, transparent and manageable for states to operationalize. Any change that would restrict, impede or add uncertainty to our state's ability to waive areas with elevated unemployment must not be pursued. There is no justification for weakening current waiver rules and exposing more people to the SNAP time-limit. Economic opportunity varies dramatically across Colorado. Unemployment rates range from a low of 2.8 in the Denver-metro region to highs of 6.1 in San Miguel County and 5.7 in Huerfano and Pitkin counties.

In conclusion, we ask the USDA to refrain from making any changes that would restrict access to food assistance and increase food insecurity among Colorado's kids. The only action we do support is one that eliminates the eligibility time-limit, restoring SNAP's ability to provide food assistance to impoverished groups across Colorado.

Thank you for this opportunity to comment in response to this proposal. If you have any questions or concerns about our recommendations, please contact Erin Miller at erin@coloradokids.org.

Sincerely,

Erin Miller
Vice President, Health Initiatives
Colorado Children's campaign