



May 14, 2018

Vote No on H.R. 2, the Agriculture and Nutrition Act of 2018

Dear Representative,

On behalf of The Leadership Conference on Civil and Human Rights, a coalition charged by its diverse membership of more than 200 national organizations to promote and protect the civil and human rights of all persons in the United States, I write to express our opposition to H.R. 2, the Agriculture and Nutrition Act of 2018 (the “farm bill”). The proposed changes to the Supplemental Nutrition Assistance Program (SNAP), specifically the expansion of stringent work requirements, will threaten the economic security of low-income individuals across the country. Congress should instead combat hunger and food insecurity by protecting and strengthening SNAP in a bipartisan farm bill. We urge you to vote no on H.R. 2 to protect the millions of people across the country who depend on SNAP to access adequate nutrition for themselves and their families. **The Leadership Conference will score your position on H.R. 2 in our voting record for the second session of the 115th Congress.**

The Leadership Conference on Civil and Human Rights is concerned by attempts to further restrict food assistance to low-income individuals, endangering their economic security as well as that of their families. SNAP is the most effective anti-hunger program in the country, helping 1 in 8 Americans afford a basic diet.ⁱ The right to food, recognized in Article 25 of the 1948 Universal Declaration of Human Rights,ⁱⁱ guarantees freedom from hunger and access to safe and nutritious food. SNAP plays a critical role in addressing hunger and food insecurity in the communities that we represent, and it is the first line of defense against hunger for many low-income individuals. As of February 2018, the program helps about 40 million people in 20 million households put food on the table.ⁱⁱⁱ SNAP has also played a significant role in reducing poverty: the program moved 8.4 million people out of poverty in 2015, reducing the poverty rate from 15.4 percent to 12.8 percent.^{iv}

Though lawmakers have historically worked on a bipartisan basis on the farm bill, that unfortunately has not been the case this year. Instead, on partisan lines, the House Committee on Agriculture has put forward a bill that would take away SNAP from “more than 1 million low-income households with more than 2 million people – particularly low-income working families with children,” and would cut more than \$20 billion from SNAP over 10 years.^v The harsh new requirements that it would impose would result in taking nutrition assistance away from the individuals that need them the most, disproportionately harming people of color, women, children, people with disabilities, and the elderly. For communities of color, who experience food insecurity at higher rates compared with all U.S. households, changes to the SNAP program could make a major difference in their ability to

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get food on the table. In 2016, food insecurity affected 23 percent of African American households^{vi} and 19 percent of Latino households.^{vii} Given the existing institutional barriers that communities of color face in achieving economic security, any efforts to further restrict access to nutrition assistance programs could be particularly devastating. The nutrition provisions of the farm bill passed on party lines by the House Committee on Agriculture on April 18 would increase food insecurity and hardship for some of the most vulnerable individuals living in America.^{viii}

As SNAP is currently structured, the program already encourages work. Among SNAP participants who can work, most do. In households with at least one working-age, non-disabled adult, 59 percent were employed while receiving SNAP, and 81 percent were employed prior to or after receiving SNAP.^{ix} Individuals are more likely to participate in SNAP when they are out of work, and for many non-disabled adults, receipt of SNAP is already short-term.

Under the proposed work requirement provision in H.R. 2, individuals who are not able to submit proof of employment or participation in a work program face the possibility of having no access to nutrition assistance for anywhere from one to three years.^x Some of the most vulnerable communities that depend on SNAP may be at risk of losing benefits under the provisions of H.R. 2. This includes:

- 15.2 million women who participated in SNAP in 2016, representing 63 percent of adult recipients^{xi};
- 13 million African Americans^{xii} and 10 million Latinos^{xiii} who participated in SNAP in 2016;
- Over 6 million people with disabilities who participated in SNAP in 2016, including 4 million non-elderly adults who receive disability benefits, approximately 2 million who don't receive disability benefits but have work-limiting health conditions, and many children^{xiv};
- 9 million children who participated in SNAP in 2016, representing about 44 percent of participants^{xv};
- At least 1.3 million LGB adults aged 18 to 44 who participated in SNAP in 2016^{xvi};
- Some 5.1 million seniors aged 60 and over who received SNAP in 2016, and an additional 4.2 million older Americans aged 50 through 59 who got SNAP each month^{xvii}; and
- 1.5 million veterans who live in households that participated in SNAP in 2016.^{xviii}

If signed into law, H.R. 2 would require that SNAP recipients ages 18-59 who are not disabled or raising a child under the age of six to provide monthly documentation that they are working a minimum of 20 hours a week, participating at least 20 hours a week in a work program, or engaging in some combination of these two activities.^{xix} This new administrative burden would create additional challenges and make an already complex system more difficult to navigate for individuals in need of SNAP assistance. As SNAP currently stands, adults without a disability ages 18-49 who also do not have custody of dependent children are limited to only three months of SNAP in a 36-month period unless they are able to find work or job training activities for at least 20 hours per week.^{xx} SNAP's time limit rule does provide states with the ability to seek waivers from the U.S. Department of Agriculture (USDA) to temporarily suspend the three-month limit for individuals in areas with high unemployment or insufficient job opportunities.^{xxi} In 2007, to address the Great Recession's impact on job loss and increased hardship for unemployed workers, Congress temporarily expanded the circumstances under which a state could apply for such a waiver.^{xxii} These waivers have been an invaluable resource to those individuals who need SNAP to help

get food on the table, but who might face additional hardship in securing adequate documentation to prove their employment or in finding secure employment opportunities that meet the mandated work requirements. When several states re-instated the time limit in 2016, at least 500,000 able bodied adults without dependents (ABAWDs) lost access to food provided through SNAP.^{xxiii}

Proponents of H.R. 2 have argued that implementing work requirements help people find work, but the reality is that most working-age adults on SNAP who can work do so. Supporters of H.R. 2 have said that the bill would require states to provide work program slots to individuals who are not exempt from work requirements and who cannot find employment for at least 20 hours a week. The reality of how this would work in practice is quite different. The level of investment proposed in H.R. 2 is severely inadequate to ensure proper education and training for current SNAP participants who would be subject to these stringent work requirements and time limits. As is, the bill authorizes only \$7.65 billion over 10 years for education and training programs. This equals only \$30 per participant per month to serve the 3 million people who will need work slots and directly conflicts with research which has shown that the cost of operating effective programs that promote opportunity ranges from about \$7,500 to \$14,000 per participant.^{xxiv} A May 2018 Congressional Budget Office (CBO) report found that states would not be able to offer job training opportunities to all recipients by the time the requirement takes effect in 2021. In fact, CBO found that by 2028 only 80 percent of SNAP recipients subject to work requirements would be offered the training program based on funding outlined in H.R. 2.

The inclusion of stricter work requirements in H.R. 2 would harm – not help – SNAP recipients. Although SNAP encourages work, SNAP participants are generally low-income, low-skill working people with a limited range of job prospects. Despite a decline in the national unemployment rate, continued wage stagnation and limited economic opportunities mean that many working people are still struggling to make ends meet. The nature of today’s low-wage labor market is characterized by unstable and low-quality jobs, one in which low-wage working people often need SNAP to cover the cost of food either while they are working, or to help bridge a period between jobs.

Since working people with volatile schedules experience instability and unpredictability in their hours, programs that impose work requirements pose a unique challenge for these individuals.^{xxv} Compounding these challenges, 83 percent of part-time workers report having unstable work schedules.^{xxvi} About half of low-wage hourly workers do not have 9-to-5, Monday-through-Friday jobs.^{xxvii} A recent study found that 40 percent of hourly workers ages 26 to 32 receive one week or less advance notice of their job schedules.^{xxviii} Unstable schedules make it difficult for working people to arrange transportation, arrange child care, attend job training or school, hold a second job, manage their budgets, and maintain a stable income.^{xxix}

The expansion of work requirements is particularly problematic for individuals with disabilities, for whom navigating the employment landscape may be significantly more challenging. Even where individuals do not qualify for a federal disability benefit, they still may face significant barriers to working 20 or more hours per week. The Bureau of Labor Statistics (BLS) reports that working people with disabilities are nearly twice as likely as working people with no disability to be employed part-time.^{xxx} Furthermore, in a May 2012 report, BLS reported that half of working-age adults with a disability who were not working reported barriers to employment, including a lack of transportation and the need

for accommodations in a workplace.^{xxxii} Because of the historic unemployment and underemployment of people with disabilities, which current workforce and SNAP employment systems are not adequately structured or funded to solve, expanding work requirements would result in the loss of crucial nutrition assistance for millions of low-income individuals with disabilities.

College students, who generally fall into the age range of recipients that would be subject to stricter work requirements, would also face additional challenges in trying to access adequate nutrition. This is particularly concerning as food insecurity on college campuses disproportionately impacts students of color and low-income students. A study by Wisconsin's HOPE Lab found that 47 percent of Black students and 42 percent of Hispanic students at 4-year institutions experience food insecurity in comparison to 30 percent of their White peers.^{xxxiii} Yet, according to the USDA, "[m]ost able-bodied students ages 18 through 49 who are enrolled in college or other institutions of higher education at least half time are not eligible for SNAP benefits."^{xxxiii} Though the federal work-study program creates an exemption opportunity^{xxxiv}, students may still face barriers to enrolling in SNAP. Furthermore, not every school participates in the work-study program; where schools have work-study programs, jobs are often limited and not guaranteed from year to year. This leaves low-income college students without any support to help them avoid food insecurity. Imposing even more stringent work requirements on students will only exacerbate the challenges they face to accessing the nutrition that they need.

The Leadership Conference supports the goal of helping people find work, but it is imperative that we do so by providing employment opportunities that have sufficient hours, livable wages, and institutional systems and policies that allow working people to support themselves and their families. Without these types of supports, a job alone is not sufficient to promote food security, well-being, and economic mobility. There are a variety of remedies that would allow all working people, and specifically those enrolled in public benefit programs, to have jobs that provide fair wages, promote productivity, and allow them to care for themselves and/or their families. This includes passing legislation that would raise the minimum wage, ensure fair work scheduling, provide paid family and medical leave and paid sick days, expand Medicaid eligibility, and address basic living standards.^{xxxv}

The Leadership Conference believes that H.R. 2 is a flawed bill that will exacerbate the already striking consequences of the tax law passed by Congress late last year. The nutrition title in H.R. 2 includes benefit cuts and harsh new requirements that, among other problems, would hurt many low-income working families, children, and individuals who struggle to find stable employment. Imposing barriers to food assistance will not incentivize or equip people with what they need to seek and maintain work. It will only result in many SNAP participants losing critical food assistance, increase hardship, and further widen inequality.^{xxxvi} For these reasons, we urge you to vote no on H.R. 2. If you have any questions, contact Emily Chatterjee, Senior Counsel, at chatterjee@civilrights.org.

Sincerely,



Vanita Gupta
President & CEO

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