

**Congress of the United States**  
**House of Representatives**  
Washington, DC 20515

April 2, 2019

The Honorable Sonny Perdue  
Secretary  
United States Department of Agriculture  
1400 Independence Avenue, S.W.  
Washington, D.C. 20250

Dear Secretary Perdue:

We write to express concerns about the United States Department of Agriculture's (USDA) proposed rule, published on February 1, 2019, titled Supplemental Nutrition Assistance Program: Requirements for Able-Bodied Adults Without Dependents (Docket No. FNS-2018-0004). The proposed rule would introduce political interference into state-level administration of the Supplemental Nutrition Assistance Program (SNAP). We strongly oppose this policy and urge you to withdraw the proposed rule.

SNAP, formerly known as the food stamp program, is our nation's foremost and most effective anti-hunger program. Currently, roughly 40 million people in more than 20 million households rely on the program to be able to afford a sufficient diet. SNAP recipients are our nation's most vulnerable — nearly 20 million are children, almost 5 million are low-income seniors, and 1.5 million are military veterans.

The proposed rule is a continued pursuit of the flawed political ideology that was resoundingly rejected by Congress in the 2018 Farm Bill. The House-passed bill included a partisan proposal to increase SNAP work requirements, a move that would have cut total SNAP benefits by roughly \$23 billion over ten years. Ultimately, this proposal was defeated, on a bipartisan basis, by both the House and the Senate. With regard to stricter SNAP work requirements, the will of Congress is clear.

The misconception that stricter work requirements are the answer to poverty and unemployment rests on the false belief that disadvantaged people will only work if the government forces them to. In reality, nearly seventy-five percent of SNAP recipients are working within the year that they claim benefits<sup>1</sup>. However, many are only able to find unstable jobs that often are seasonal, low-pay, or lacking important benefits, like paid sick leave, that make it difficult to maintain year-round employment. These are part of the complex economic barriers that prevent people from working, even if they want to.

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<sup>1</sup> Keith-Jennings, Brynne and Raheem Chaudhry. "Most Working-Age SNAP Participants Work, But Often in Unstable Jobs." *Center on Budget and Policy Priorities*. 15 March 2018.

While the U.S. economy has expanded following the Great Recession, job creation and wage growth have varied greatly from state to state<sup>2</sup>. Even within the same state, regional economic differences exist, particularly among rural areas experiencing persistent poverty. According to the Department of Labor, nearly 1,000 counties across the country are currently classified as Labor Surplus Areas<sup>3</sup>. The proposed rule would restrict a state's ability to provide food assistance to individuals in these areas with too few jobs.


Furthermore, for many Americans implicit barriers to work often exist that make it hard to get and maintain employment. These barriers have been shown to include a lack of adequate skills or work experience that employers seek, unmet personal needs that make employment unattainable, as well as persistent bias against people of color in the job market. For example, studies continue to show that African American and Latino applications receive significantly fewer callbacks than white Americans based on their names alone, even when their applications are the same<sup>4</sup>. Mandating stricter work requirements does not solve these issues, and in many cases only exacerbates them.

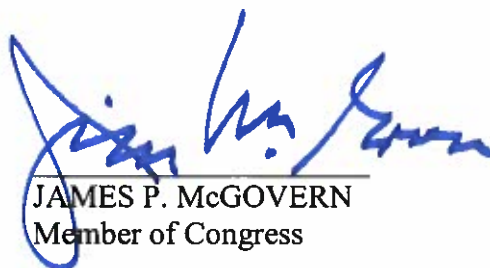
A growing body of social science research shows that work requirements do nothing to reduce poverty or promote 'self-sufficiency.' An analysis of the mandatory work requirements in the Temporary Assistance for Needy Families, or TANF, program, created through the 1996 welfare reform, shows that the program set people up to fail<sup>5</sup>. There was no meaningful increase in people becoming employed due to the requirements. Instead, most TANF recipients subject to work requirements never reached self-sufficiency. To add insult to injury, most remained in poverty or — worse yet — many became even poorer.

The proposed rule is a solution in search of a problem that does not exist. SNAP already has stringent work requirements, and, in reality, those on SNAP who are able to work currently do. Time and again, SNAP has been shown to successfully reduce poverty and alleviate hunger. Therefore, we again urge you to withdraw this proposed rule, and to ensure that this vital nutrition assistance remains accessible for all who need it.

Sincerely,

  
ROSA L. DeLAURO  
Member of Congress

  
LINDA T. SANCHEZ  
Member of Congress

  
JAMES P. McGOVERN  
Member of Congress

<sup>2</sup> [https://www.jec.senate.gov/public/\\_cache/files/368262a9-f21f-43da-ab7c-8ebae1f9249e/state-economic-snapshots-november-2018.pdf](https://www.jec.senate.gov/public/_cache/files/368262a9-f21f-43da-ab7c-8ebae1f9249e/state-economic-snapshots-november-2018.pdf)

<sup>3</sup> [https://www.doleta.gov/lisa/docs/2019\\_LSA\\_Federal\\_Register\\_Notice.pdf](https://www.doleta.gov/lisa/docs/2019_LSA_Federal_Register_Notice.pdf)

<sup>4</sup> <https://www.pnas.org/content/early/2017/09/11/1706255114.full>, The persistence of racial discrimination in hiring, Lincoln Quillian, Devah Pager, Ole Hexel, Arnfinn H. Midtbøen, Proceedings of the National Academy of Sciences Sep 2017

<sup>5</sup> <https://www.cbpp.org/research/poverty-and-inequality/work-requirements-dont-cut-poverty-evidence-shows>



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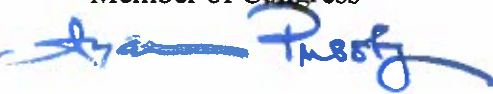
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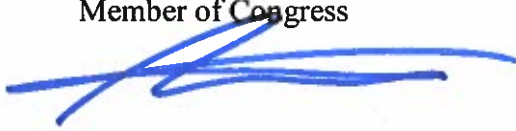
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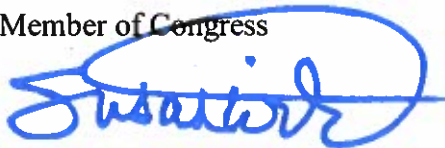
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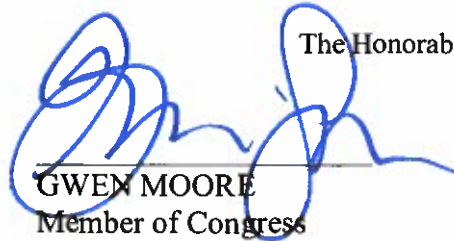
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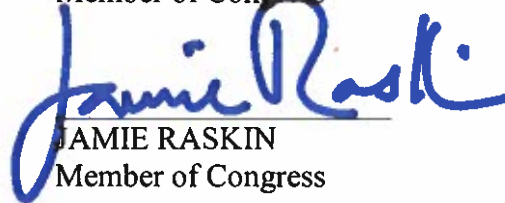
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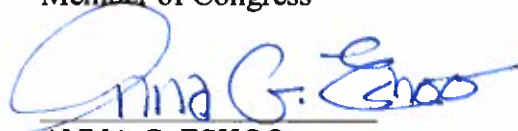
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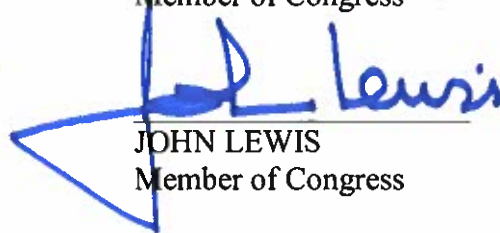
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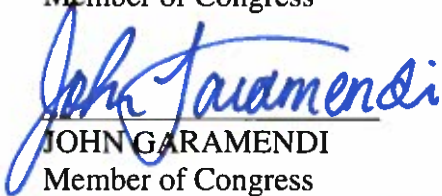
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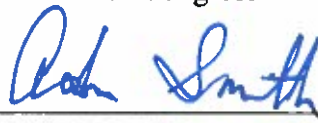
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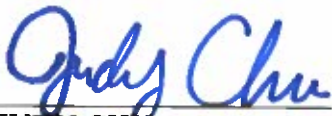


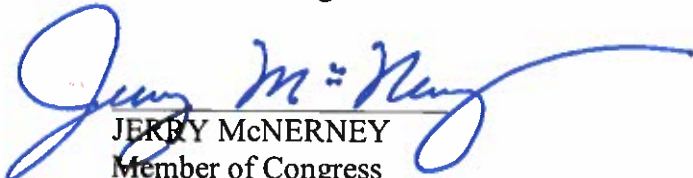
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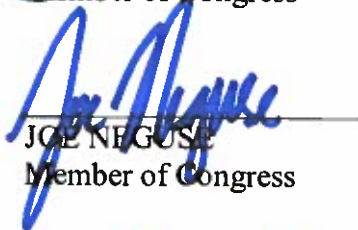
  
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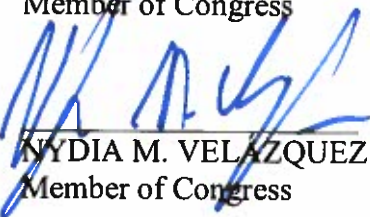
  
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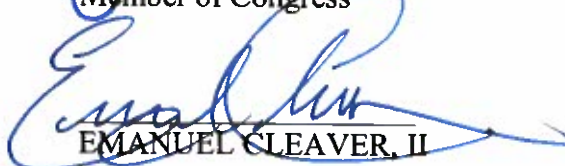
  
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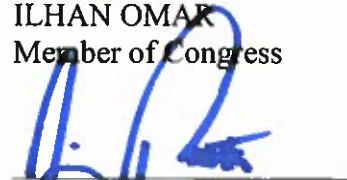
  
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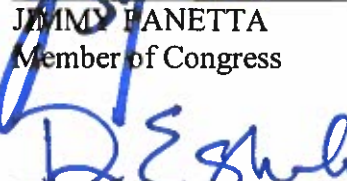
  
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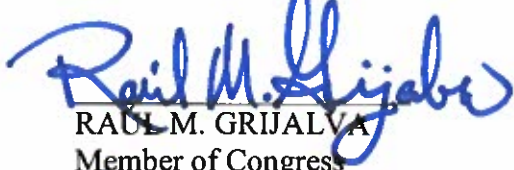
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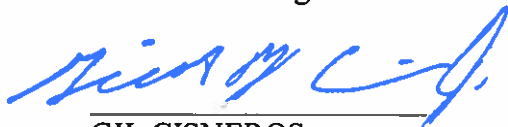
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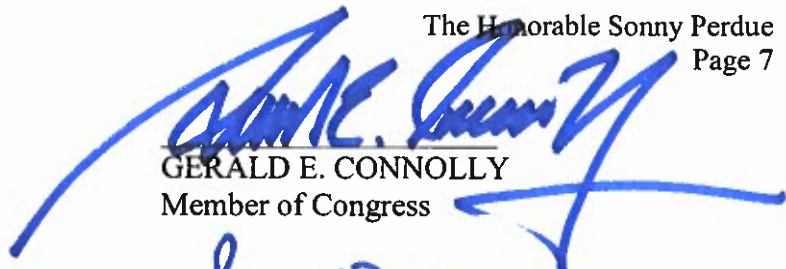
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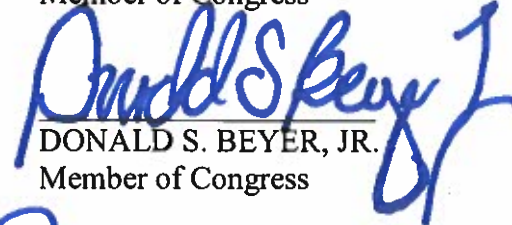
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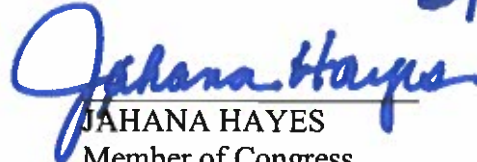
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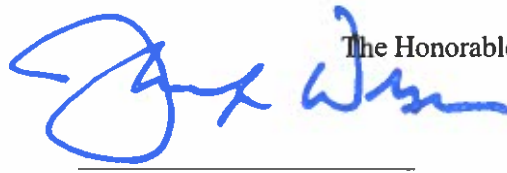


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