

March 29, 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:

Thank you for the opportunity to comment in opposition to USDA's Proposed Rule on Requirements for Able-Bodied Adults Without Dependents (ABAWDs).

Kansas Action for Children (KAC) is a nonprofit, nonpartisan organization committed to improving the lives of Kansas children and families by providing comprehensive data, advocating for sound public policy, and collaborating with lawmakers.

The existing SNAP three-month time limit for so-called Able-Bodied Adults Without Dependents (ABAWDs) purports to solely impact adults who do not have children. In practice, however, low income children and youth also experience harm as a result of this policy. The proposed rule, by making it more difficult for states to waive the time-limit for low-income individuals facing barriers to employment, will only exacerbate the spillover effect onto vulnerable young people.

### **SNAP Is the First Line of Defense Against Child Food Insecurity**

Food insecurity remains a major threat to health and wellbeing of 12.5 million children in America.<sup>i</sup> This means that in 2017, one in six children lived in a household that had uncertain access to enough healthy food. In 2017, 18.3 percent of Kansas children under age 18 lived in food insecure households.<sup>ii</sup> That's more than 130,000 Kansas children without a dependable source of food.

Food insecurity has devastating consequences for children. Without access to healthy food, children suffer negative consequences to their health, education, and development. Research shows that nutrition is one of, if not the, most critical environmental influence on a developing infant and child.<sup>iii</sup> Beginning with the maternal diet during pregnancy, proper nutrition is crucial for healthy brain development. As Dr. Claire McCarthy writes on the Harvard Health Blog:

“The ways that the brain develops during pregnancy and during the first two years of life are like scaffolding: they literally define how the brain will work for the rest of a person’s life. Nerves grow and connect and get covered with myelin, creating the systems that decide how a child — and the adult she becomes — thinks and feels. Those connections and changes affect sensory systems, learning, memory, attention, processing speed, the ability to control impulses and mood, and even the ability to multitask or plan.”<sup>iv</sup>

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Nutrient-rich diets for both the mother (when pregnant or breastfeeding) and child promote normal brain development. While every family wants to be able to provide healthy and fresh food for their youngest members, many families in Kansas struggle with food insecurity. When children don't have access to the nutrition their developing minds and bodies need, they are at greater risk for obesity and other long-term health problems. Hungry kids are also more likely to repeat a grade in elementary school, experience developmental impairments in areas such as language and motor skills, and have more social and behavioral problems.<sup>v</sup>

As the nation's largest federal food assistance program, the Supplemental Nutrition Assistance Program (SNAP) is the first line of defense against child food insecurity. SNAP works efficiently and effectively by providing low-income households with monthly funds specifically designated for food purchases. Research links participation in SNAP for 6 months with an 8.5 percentage point decrease in food insecurity in households with children.<sup>vi</sup>

SNAP is a critically important resource for children given their higher prevalence of food insecurity and high rates of participation. In 2015, 19.2 million U.S. children utilized SNAP for access to consistent food, representing 44 percent of participants.<sup>vii</sup> In the last year of available data, 234,000 Kansans participated in the program or 8 percent of the Kansas population.<sup>viii</sup> Nearly three-fourths of Kansas SNAP participants are in families with children.<sup>ix</sup> However, 29 percent of eligible individuals in Kansas do not receive the benefit.

Beyond its role in fighting food insecurity, SNAP significantly reduces child poverty and helps struggling families to make ends meet: SNAP benefits lifted 1.5 million children out of poverty in 2017 alone.<sup>x</sup> The economic impact doesn't stop at the individual family. It is estimated that "in a weak economy, \$1 in SNAP benefits generates \$1.70 in economic activity."<sup>xi</sup> Nearly all (97 percent) of SNAP benefits are spent in the month they are received, with over half (59 percent) being spent in the first week, meaning SNAP funds are going back into the economy almost immediately.<sup>xii</sup>

### **The Proposed Changes to State Waiver Flexibilities Will Harm Children**

Existing state flexibilities to waive these counterproductive requirements due to economic conditions are incredibly important. The agency's proposal to restrict those flexibilities will result in an estimated 750,000 individuals losing access to the critical support they receive from SNAP.

Because SNAP is so important for low-income and food-insecure children, children under the age of 18 and the adults who live with them are technically exempt from the three-month time limit for SNAP. However, though current rules around the SNAP time-limit explicitly exempt adults who have a dependent child under the age of 18 or live in a household with children under 18, this definition may not allow for the complex financial arrangements that low-income families utilize on to put food on the table. Our organization represents the interests of vulnerable children who as a result of this rule will experience a reduction in important resources that help meet their basic needs, even though FNS does not account for this in its cost benefit analysis. This includes:

- Children with non-custodial parents.

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- Children whose extended family members provide financial support.
- Children impacted by the opioid crisis.
- Youth aging out of foster care and unaccompanied homeless youth.

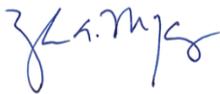
## Conclusion

Already, the SNAP time-limit for Able Bodied Adults Without Dependents adversely impacts children and vulnerable youth, even though they are not the intended targets of that policy. This proposed rule would exacerbate this problem. Furthermore, it flies in the face of Congressional intent, given the fact that Congress just concluded a review and reauthorization of SNAP in the Agriculture Improvement Act of 2018 and explicitly rejected the changes proposed.

Imposing further limitations on SNAP benefits will harm Kansas kids and families. No child should go hungry. No family should wonder where the next meal is coming from. The brain development that happens in early childhood is the foundation for lifelong learning. But without proper nutrition, that development is stymied.

We strongly oppose the proposed changes, as they would further expose low-income adults—as well as children who may be relying on them for help meeting basic needs—to the harm of the SNAP time-limit. Taking food off the table is no way to help individuals achieve economic mobility.

Sincerely,



Annie McKay  
President & CEO

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<sup>i</sup> Alisha Coleman-Jensen, Matthew P. Rabbitt, Christian A. Gregory, and Anita Singh, “Household Food Insecurity in the United States in 2017,” U.S. Department of Agriculture, September 2018, <https://www.ers.usda.gov/webdocs/publications/90023/err-256.pdf?v=0>

<sup>ii</sup> KIDS COUNT Data Center. Food Insecurity. Annie E. Casey Foundation. Original Data Source: Data Source: Feeding America: Map the Meal Gap. <https://datacenter.kidscount.org/data/tables/10238-food-insecurity?loc=18&loct=2#detailed/2/any/false/870,573,869,36/any/19818>

<sup>iii</sup> The Urban Child Institute. “Nutrition and Early Brain Development.” March 25, 2011. <http://www.urbanchildinstitute.org/articles/updates/nutrition-and-early-brain-development>

<sup>iv</sup> McCarthy, Dr. Claire. “The crucial brain foods all children need.” Harvard Health Publishing, Harvard Medical School. January 23, 2018. <https://www.health.harvard.edu/blog/brain-food-children-nutrition-2018012313168>

<sup>v</sup> Feeding America. “Hunger deprives our kids of more than just food.” <https://www.feedingamerica.org/hunger-in-america/child-hunger-facts>

<sup>vi</sup> James Mabli, Jim Ohls, Lisa Dragoset, Laura Castner, and Betsy Santos, “Measuring the Effect of Supplemental Nutrition Assistance Program (SNAP) Participation on Food Security,” U.S. Department of Agriculture Food and Nutrition Service, August 2013. <https://fns-prod.azureedge.net/sites/default/files/Measuring2013.pdf>

<sup>vii</sup> Sarah Lauffer, “Characteristics of Supplemental Nutrition Assistance Program Households: Fiscal Year 2016,” United States Department of Agriculture, November 2017, <https://fns-prod.azureedge.net/sites/default/files/ops/Characteristics2016.pdf>

<sup>viii</sup> Nchako, Catlin and Lexin Cai. “A Closer Look at Who Benefits from SNAP: State-by State Fact Sheets (Kansas).” Center on Budget and Policy Priorities. December 3, 2018. <https://www.cbpp.org/research/food-assistance/a-closer-look-at-who-benefits-from-snap-state-by-state-fact-sheets#Kansas>

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<sup>ix</sup> Nchako, Catlin and Lexin Cai. "A Closer Look at Who Benefits from SNAP: State-by State Fact Sheets (Kansas)." Center on Budget and Policy Priorities. December 3, 2018.

<https://www.cbpp.org/research/food-assistance/a-closer-look-at-who-benefits-from-snap-state-by-state-fact-sheets#Kansas>

<sup>x</sup> Liana Fox, "The Supplemental Poverty Measure: 2017," U.S. Census Bureau, September 2018, <https://www.census.gov/content/dam/Census/library/publications/2017/demo/p60-261.pdf>

<sup>xi</sup> Nchako, Catlin and Lexin Cai. "A Closer Look at Who Benefits from SNAP: State-by State Fact Sheets (Kansas)." Center on Budget and Policy Priorities. December 3, 2018.

<https://www.cbpp.org/research/food-assistance/a-closer-look-at-who-benefits-from-snap-state-by-state-fact-sheets#Kansas>

<sup>xii</sup> Center for Budget and Policy Priorities. "Chart Book: SNAP Helps Struggling Families Put Food on the Table." February 13, 2018. <https://www.cbpp.org/sites/default/files/atoms/files/3-13-12fa-chartbook.pdf>

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