March 22, 2019

Sasha Gersten-Paal
Chief, Certification Policy Branch
Program Development Division
Food and Nutrition Service, USDA
3101 Park Center Drive
Alexandria, VA 22302

RE: Docket No. FNS-2018-0004-Supplemental Nutrition Assistance Program: Requirements for Able-Bodied Adults Without Dependents

Dear Ms. Gersten-Paal:

On behalf of the Los Angeles Homeless Services Authority (LAHSA), we submit our response to the request for comments regarding Supplemental Nutrition Assistance Program: Requirements for Able-Bodied Adults Without Dependents as issued in the February 1, 2019 Federal Register (Docket No. FNS-2018-0004).

LAHSA is a joint-powers authority of the City and County of Los Angeles and serves as the lead agency in the Los Angeles Continuum of Care (LA CoC). LAHSA is responsible for funding a significant portion of the interim housing, permanent housing, and supportive services for individuals and families experiencing homelessness in Los Angeles County. LAHSA’s mission is to combat homelessness and to ensure everyone in the LA CoC has access to safe and stable housing. As such, we wholly oppose the Food and Nutrition Service’s proposed rule change restricting waivers for the Supplemental Nutrition Assistance Program’s (SNAP, or CalFresh in California) requirements for able-bodied adults without dependents (ABAWDs).

SNAP is our nation’s most important and widely-used anti-hunger program and has been linked with improved health outcomes and lower health care costs. SNAP has been a longstanding bulwark against food insecurity for low-income and homeless individuals, who face numerous barriers to maintaining basic food needs that are not only accessible but nutritious as well. Food insecurity has been shown to increase the risk of adverse health outcomes, complicates the ability to manage illness, and has been linked to higher health care costs.¹ These outcomes have been found for various age groups and can affect both a disabled senior as well as a working-age adult.² ABAWDs are not immune to the effects of food insecurity and may need benefits, such as SNAP, just as urgently as a low-income family would. ABAWDs may face many challenges to stable employment including language barriers, histories of joblessness, a criminal record, racial discrimination, or homelessness – all of which can act as silent obstructions to compliance with work requirements.

² Ibid.
SNAP also allows recipients to have economic flexibility by allowing them to spend their limited resources on other basic needs, such as health, transportation, and housing. Restricting SNAP benefits for ABAWDs may force individuals to choose between sustenance and housing. With the severe lack of affordable housing in California, more and more people are having to make such decisions, which is ultimately contributing to the growing population of individuals at-risk of homelessness. Los Angeles County is currently home to 520,000 households paying more than half of their income on housing, the vast majority of whom are at very low- or extremely-low incomes. The data suggests that ABAWDs are not immune to experiencing economic hardships and insecurity. The goal of SNAP is to assist individuals to rise out of poverty or homelessness, but this new proposed rule change has the potential to do just the opposite and make an individual more vulnerable to falling into homelessness.

Additionally, the Food and Nutrition Service of the U.S. Department of Agriculture (USDA) contend that the proposed rule change will foster self-sufficiency and states that it is “appropriate and necessary to encourage greater ABAWD engagement with respect to job training and employment opportunities.” However, there has yet to be evidence showing that work requirements are effective at reducing poverty or that SNAP receipt serves as a disincentive to work. The Center on Budget and Policy Priorities has found that the large majority of individuals subject to work requirements remained in poverty and that most benefit recipients who faced significant barriers to employment never found sustainable employment, even after participating in employment training programs. Furthermore, the majority of SNAP recipients who are able to work are employed – more than half of ABAWDs who receive SNAP are working and more than 80% worked in the year prior to or after receiving SNAP. Employment alone does not make an individual immune from food or housing insecurity on account of the high cost of housing; in Los Angeles County, a household must make $32.68 per hour to afford the typical modest 2-bedroom unit. With a minimum wage of $13.25 per hour in Los Angeles County and the average renter wage at $21.50 per hour, many fully-employed households still struggle to pay rent, buy groceries, and seek needed medical care.

Further, meeting work requirements does not measure an individual’s willingness or motivation to work; but measures whether that individual is fortunate enough to find a job that provides them the minimum required hours per week. Although the national unemployment rate is currently low, the rates across the different metropolitan areas in California vary widely. Many jobs offer irregular or limited hours, making it difficult to comply with restrictive work requirements. The current SNAP rules are designed for this and provide states like California with necessary flexibility. Any departure from the current system that restricts or obstructs a state’s ability to adjust to local labor market conditions will add to the challenges facing California’s most vulnerable residents.

The proposed rule change also claims that this change would save the federal government $15 billion over a decade. While this may be true, the proposed rule change may end up being quite costly in the long-term. For example, by the Food and Nutrition Service’s own calculations, the reduction of SNAP benefits would cause an estimated $100 loss of revenue per small store on average per month, which has the potential to hurt small “mom and pop” businesses that serve SNAP recipients. Additionally, because SNAP is linked with reduced health care costs, about $1,400 per adult per year, it follows that a reduction in

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SNAP benefits may lead to increased health care costs at the expense of the federal government. The proposed rule change is shortsighted and potentially detrimental to more than just ABAWD SNAP recipients. This proposed rule change may lead to an increased number of adults who are increasingly susceptible to serious healthcare problems as well as homelessness.

We appreciate the opportunity from the Administration to comment on this proposed rule change; however, we oppose it in full. We urge the Administration to heed local concerns regarding restricting waiver flexibility for ABAWDs and withdraw this proposed rule. We welcome an opportunity to work with the Food and Nutrition Service on alternate ways to foster self-sufficiency in low-income and vulnerable populations.

Sincerely,

Kelli Bernard
Chair, LAHSE Commission

Peter Lynn
Executive Director

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*See note 1.*