



Association of Arizona Food Banks

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March 14, 2019

US Department of Agriculture, Food & Nutrition Service
Certification Policy Branch, Program Development Division
3101 Park Center Drive
Alexandria, VA 22302

Re: Supplemental Nutrition Assistance Program: Requirements for Able-Bodied Adults without Dependents (FNS-2018-0004 / RIN: 0584-AE57)

Dear Sir or Madam:

Based on decades of experience helping Arizonans facing hunger, the Association of Arizona Food Banks (AAFB) and our members believe that the USDA proposed SNAP rules could force up to 50,000 Arizonans¹ into food insecurity by unreasonably limiting nutrition benefits. **We strongly oppose this proposed rule.**

In Arizona, nearly 1 in 6 individuals and more than 1 in 4 children struggle with food insecurity.² This is more prevalent in rural communities and tribal nations, where as much as 35 percent of children don't know where their next meal is coming from.³ AAFB and its members serve 450,000 Arizonans in need each month, including children and seniors. Last year, we distributed more than 175 million pounds of food statewide.⁴ However, we cannot end hunger alone. For every meal we provide, SNAP provides twelve. In 2018, SNAP helped an average of 850,000 Arizonans access food each month, and 50 percent of them were children.⁵ This partnership is critical to making sure Arizonans have access to healthy foods that allow them to work and play.

Adequate Nutrition Assistance Supports a Strong Economy

In the proposed rule changes, the USDA states their intent is to "improve employment outcomes and economic independence,"⁶ but, in practice, the proposed changes would eliminate food assistance from

¹ Cited number of SNAP participants qualified as Able-Bodied Adults without Dependents (ABAWDs) provided by Arizona's Department of Economic Security (DES), in correspondence and cited in this article: "[USDA Proposes Stricter Requirements for SNAP Program](#)," by Mark Brodie, KJZZ (Arizona's local NPR affiliate). 16 January 2019.

² Feeding America, [Map the Meal Gap 2018: A Report on County and Congressional District Food Insecurity and County Food Cost in the United States in 2016](#). Published May 2018.

³ Ibid.

⁴ AAFB's calculations based on data collection from five member food banks: Community Food Bank of Southern Arizona, HonorHealth Desert Mission Food Bank, St. Mary's Food Bank Alliance, United Food Bank, and Yuma Community Food Bank.

⁵ State of Arizona, Department of Economic Security (DES), [Arizona Legislative Districts: DES Client/Provider and Community Demographics Summary Handbook 2018](#). January 2019.

⁶ Page 981, Column 1, Paragraph 1. [Federal Register, Vol. 84, No. 22](#) / Friday, February 1, 2019 / Proposed Rules

Excellence through Collaboration

Community Food Bank of Southern Arizona, Tucson | Desert Mission Food Bank, Phoenix
St. Mary's Food Bank Alliance, Phoenix | United Food Bank, Mesa | Yuma Community Food Bank, Yuma

Arizonans who are struggling to find stable employment without providing them help to become permanently employed.

SNAP already has strict time limits that restrict access to food assistance to three months out of every three years for most working-age adults. While the economy has improved in recent years, it is not yet strong everywhere nor is it equally strong for every person seeking a job. In the 2018 Farm Bill, Congress sought to mitigate the unique challenges of certain populations and certain communities by continuing to allow states the discretion to waive these time limits based on local workforce circumstances.

Experience and evidence show that able-bodied adults without dependents (ABAWDs) are among the most vulnerable members of our communities. In Arizona, this includes seasonal agricultural workers, veterans, people with limited education and job skills, former foster youth, people with mental health and substance abuse issues, formerly incarcerated individuals, and people in rural areas with limited transportation. By supporting states' capacity to waive time limits in certain areas, Congress and governors nationwide recognize that an arbitrary SNAP time limit or unemployment floor does nothing to address these substantial barriers to long-term employment.

While average unemployment rates in 11 of Arizona's 15 counties are below 7 percent,⁷ the Bureau of Labor Statistics indicates that the unemployment rate for individuals without a high school diploma/GED and individuals in the service sector are often more than double the average community unemployment rate. ABAWD waivers allow states to mitigate these and other economic realities, including the anticipated negative impact the proposed rule would have on American Indian populations living in rural areas. For example, at least four Arizona counties (Cochise, Coconino, La Paz, and Pinal) would have lost their ability to waive SNAP time limits in 2018, if the proposed rule had been in place at that time.⁸ Not only would this have a disparate impact on the many rural communities in these counties—where significant employment opportunities are unlikely to materialize due to infrastructure and connectivity challenges—but it would also have a disproportionate impact on the Hopi people. About 20 percent of the Hopi Reservation population live in Coconino County, which would no longer be eligible to waive SNAP time limits under the proposed rule.⁹

There is no evidence that imposing a time limit on a person's access to food incentivizes work or results in an individual achieving self-sufficiency through new employment opportunities. In fact, evidence in Arizona indicates that SNAP participants who can work do work, which undermines the faulty assumption upon which this entire proposed rule change is based. As an overview, approximately 850,000 Arizonans participated in SNAP last year: 54 percent children, 11 percent senior citizens, and 12 percent people with disabilities. That means, the remaining 25 percent of SNAP participants were work-eligible: half of them already worked more than 20 hours per week in one or more jobs, and the other half were considered legally exempt from work requirements based on existing geographic waivers and other criteria.¹⁰

⁷ Bureau of Labor Statistics, [Local Area Unemployment Statistics Map](#), accessed 1 March 2019.

⁸ Analysis by the Center on Budget and Policy Priorities, Food Assistance Division, 27 Feb. 2019.

⁹ Analysis by AAFB.

¹⁰ Data based on public records request from the Arizona Department of Economic Security in April 2018.

The fact that many of the Arizonans who would lose access to food assistance as a result of this proposed rule *are actually currently employed* is a grave concern. Many low-income workers in Arizona are employed in seasonal industries such as agriculture and construction, or in jobs with inconsistent hours such as the service sector. An individual's shift hours fluctuate and might fall short of a consistent 20 hours per work week. Jeopardizing that person's food security amid already tenuous job security would not put him or her on a path to economic empowerment and self-sufficiency, as the proposed rule claims. Also, by increasing the bureaucracy required to track and document work hours, there is the dangerous potential that a person could successfully meet the work requirement but lose food assistance for failing to accurately complete paperwork. The time necessary to prepare and report the work would also take away from opportunities to actually be working.

Governors need to retain flexibility to better respond to local conditions and workforce needs. Governor Doug Ducey, Arizona's current governor, has shown thoughtful discretion in seeking waiver authority; he and other future governors should not have that authority removed by this Administration or any other. The administration should not be in a position of second guessing states' demonstration of a lack of sufficient jobs when data supports it. This Administration promotes local control in many other sectors of federal policy, and we oppose the discrepancy in this rule, which removes critical local input and flexibility.

Lastly, the proposed rule changes limit SNAP's capacity to be responsive, a core characteristic and intention of the program that was embedded in its initial establishment in the 1964 Food Stamp Act. SNAP is, by nature, countercyclical—that is, when the economy improves, the SNAP caseload declines, and vice versa. Due to its ease of distribution, SNAP is also able to ratchet up quickly during an economic downturn. Although the U.S. economy is currently strong, historical evidence shows us that inevitably, at some point in the future, there will be another recession. Creating rules that make the program less responsive to economic downturns would put food access in jeopardy during future recessions. Similarly, qualifying for extended unemployment benefits is an extreme threshold for states to meet in order to receive ABAWD waivers in geographical areas with insufficient jobs. Extended benefits have not been triggered in Arizona for many years, and waiting until they are would require individuals to forego access to groceries during a highly difficult time. It would also place undue burden on food banks to bridge the gap.

Capacity to Support People Who Will Lose Food Access is Limited

Based on estimates from the Arizona Department of Economic Security, up to 50,000 Arizonans participating in SNAP are classified as ABAWDs.¹¹ In mid-2018, the SNAP Employment & Training programs—based solely in Maricopa and Pima Counties—saw an average of 125 participants per month obtain employment.¹² The infrastructure to support such a drastic increase in participation is insufficient. In 2018, on average 6,600 jobs were gained each month in Arizona,¹³ and our employer community would struggle to put such a large number of individuals into the workforce all at once.

¹¹ See Footnote #1.

¹² State of Arizona, Department of Economic Security. [Supplemental Nutrition Assistance Employment and Training \(SNA E&T\) State Plan, Federal Fiscal Year 2018](#). Published 11 August 2017.

¹³ Arizona Office of Economic Opportunity, [Monthly Employment Report](#). 7 March 2019.

Similarly, the capacity of our member food banks and statewide emergency food network to serve the 450,000 people that visit each month¹⁴ is already stretched thin. During the recent partial federal government shutdown, our members saw a spike in the number of clients visiting each day; if these rules were to be enacted, it would force us to scale up at an even more accelerated pace, which our infrastructure cannot currently support.

As Arizona's employers would have significant challenges in scaling their workforce to accommodate people impacted by the SNAP proposed rule changes, it has been suggested that ABAWDs could volunteer in order to fulfill the work requirement. However, again, food banks and other nonprofit partners do not have the capacity or supervision required to accommodate all the individuals subject to this proposed rule. This not only violates our Feeding America contracts by "requiring services for food," it would also go against our mission of reducing food insecurity by taking away food assistance to individuals who are unable to comply.

SNAP's Impact on Local Economy

SNAP generates much-needed local economic activity, especially for grocery retailers and agricultural producers. Every \$1 in SNAP benefits spent generates \$1.70 in economic activity.¹⁵ This is particularly critical in rural areas. Of the 3,882 SNAP retailers in Arizona, more than 10 percent are located in the counties that would have lost ABAWD waivers if this proposed rule were enacted in 2018. Revenue would have declined by \$663,000 per month in direct SNAP redemption for the 400 stores in those four counties.¹⁶ This would not only contribute to financial losses but also to the creation or expansion of food deserts in these areas.

The proposed rule will result in up to 50,000 Arizonans losing nutrition assistance with no clear guidance on how it would contribute to them becoming self-sustaining through employment. We strongly oppose the rule changes.

Thank you for taking our comments into consideration during the rulemaking process.

Sincerely,



President and CEO
Association of Arizona Food Banks

¹⁴ Self-reporting from AAFB and our member food banks.

¹⁵ Zandi, Mark. Moody's Analytics, [Assessing the Macro Economic Impact of Fiscal Stimulus](#). London: 2008.

¹⁶ AAFB calculation based on [USDA SNAP Retail Locator](#), accessed 1 March 2019.