



Date: April 9, 2018

Attn: Sasha Gersten-Paal
Chief, Certification Policy Branch, SNAP Program
SNAP Program Development Division
Food and Nutrition Service
United States Department of Agriculture
3101 Park Center Drive, Rm 812
Alexandria, Virginia 22302

RE: Supplemental Nutrition Assistance Program Advance Notice of Proposed Rulemaking: Requirements and Services for Able-Bodied Adults Without Dependents **(RIN: 0584-AE57)**

Submitted by: The Local Initiatives Support Corporation

Dear Chief Gersten-Paal:

Thank you for the opportunity to comment on the Advance Notice of Proposed Rulemaking (ANPRM) regarding the Supplemental Nutrition Assistance Program (SNAP) Able-Bodied Adults Without Dependents (ABAWD) time limit. The Local Initiatives Support Corporation (LISC) would like to articulate deep concern about policies that further restrict food assistance to the ABWD population – as they represent a significant portion of individuals struggling to live and find meaningful employment in communities that we serve around the country. We strongly support the goal of helping SNAP participants obtain and keep quality jobs that enable them to achieve economic security. However, we believe the restrictions suggested in the ANPRM would actually be counterproductive. Income supports like SNAP play a key role in helping low-income individuals achieve economic stability. While likely well intended, in all probability, the proposed rule changes would result in people losing access to SNAP benefits, making it more difficult to achieve this goal.

Additional details and specific feedback from LISC can be found below. If you have any questions about our public comments, please contact Nicole Barcliff, LISC Policy Director at (202) 739-9296 or nbarcliff@lisc.org.

ABOUT LISC

Established in 1979, [LISC](http://lisc.org) is one of the nation's largest nonprofit community development support organizations, dedicated to connecting hard-to-tap public and private resources with hard-to-reach communities struggling to revive. With local offices in 31 cities and 86 partners throughout rural America, LISC mobilizes corporate, government and philanthropic support to provide local community development organizations with loans, grants and equity investments; local, statewide and national policy support; and technical and management assistance. Since 1980 we have invested \$18.6 billion in communities around the country, resulting in \$56 billion in total development.



LISC Financial Stability

We know that healthy communities are made up of people who have living wage jobs and feel confident about their economic futures. That's why LISC invests in helping people tackle all the facets of financial life—earning a steady pay check, budgeting, building good credit and saving for education and retirement. LISC's financial stability programs connect low- to moderate- income families with the financial and labor market mainstream. Through our Financial Opportunity Center (FOC) model, we have learned that integrated or “bundled” services lead to concrete gains in net income and job retention. Research shows that FOC clients who take advantage of combined services – financial coaching, access to income supports, and employment and career counseling – are 50 percent more likely to land a well-paying job than people receiving employment services alone. And long-term job retention—holding a job for a year or more—almost doubles when financial coaching reinforces the work of employment counseling.

Additionally, there's a catch-22 to unemployment in many low-income communities: basic skills gaps often prevent unemployed or underemployed residents from accessing training and credentialing programs that can lead to living-wage jobs; local industries often lack a workforce with the right blend of technical know-how and “soft” skills needed for success in the workplace. A solution lies in matching employers in need of workers with a specific skill set to job seekers who have been trained in those skills. LISC's Bridges to Career Opportunities model helps clients working with our national network of FOCs ramp up foundational literacy and math skills, get technical training and pursue certifications for a particular industry—and receive support like financial coaching to set long-term goals and help manage expenses during training. These programs connect clients to “middle skills” jobs with a career pathway, and help local employers staff up with employees who can get the job done.

Rhode Island LISC SNAP E&T

Around the country, LISC is also helping public entities effectively connect people in economically challenged communities to opportunity. [Rhode Island LISC \(RI LISC\)](#) is supporting the state of Rhode Island's SNAP Employment and Training (E&T) Program to build agency capacity in order effectively meet the training and employment needs of SNAP recipients. RI LISC is helping the state of Rhode Island partner with qualified workforce development agencies that are able to offer a range of comprehensive programs and vocational and adult education training opportunities to eligible SNAP recipients through the SNAP Employment and Training (E&T) Program. The end goal is to link individuals to skills and opportunities that make them more likely to find long-term, family supporting employment.

SNAP SUPPORTS WORK & FAMILY ECONOMIC STABILITY

SNAP is our nation's most important anti-hunger program, providing food assistance to low-wage working families, people with disabilities, low-income seniors, and many more. The program helps 42 million people in nearly 21 million households put food on the table, including those referred to as ABAWDs. This population is demographically diverse in terms of race, education, and geography.[1] They face particular employment challenges since many lack reliable transportation, have unstable housing arrangements, have criminal records and unstable work histories, or have physical or mental limitations. Access to SNAP for these individuals is crucial because many are extremely poor, and the program offers a lifeline to crucial food assistance.[2]



Non-disabled adults ages 18-49 without dependent children are limited to just 3 months of SNAP in a 36-month period unless they engage in work or job training activities at least half time.[3] However, states aren't required to offer opportunities for engagement, and most do not. The systems gap effectively creates another hurdle for ABAWDs – necessitating that challenged individuals seeking assistance be savvy enough to navigate the complex workforce development system independently or lose their benefits. When several states re-instated the time limit in 2016, at least 500,000 ABAWDs lost SNAP.[4] Many states with systems gaps recognize their shortcomings, but need time, flexibility, and best practice models to address it without arbitrarily propelling their ABAWD population into food insecurity.

In addition to fighting hunger, SNAP encourages work in several ways.[5] First, SNAP's structure encourages work because as earnings rise, benefits phase out gradually. The earned income disregard, results in earnings being considered more favorably than other income when benefits are calculated. Second, SNAP promotes employment by ensuring people have their basic needs met first. Those working and seeking work on SNAP do not have to worry about when they will get their next meal. Instead, they can focus their energy on finding and keeping a job.

Work rates among SNAP participants are high. Among SNAP participants who can work, most do. In households with at least one working-age, non-disabled adult, 58 percent were employed while on SNAP, and 82 percent were employed prior to or after receiving SNAP.[6] Individuals are more likely to participate in SNAP when they are out of work and for many non-disabled adults, receipt of SNAP is short-term. Those with barriers to employment, including caretaking responsibilities, lack of education, a criminal history, and health issues are more likely to be consistently out of work.[7]

The nature of today's low-wage labor market is characterized by unstable and low-quality jobs, meaning workers often need SNAP to help pay for food. Among those working, many do not earn enough to make ends meet. Employment that once provided workers with economic security has been replaced by temporary, part-time, and other contingent work arrangements, which are often low-wage and low-quality.[8] Variable and unpredictable schedules inherent in these jobs put many in the ABAWD population at risk for losing their SNAP benefits.

These findings are consistent with what we have learned through our network of financial stability programs that focus on the hard to serve and employ. Income supports like SNAP play a key role in serving as an entry point for clients seeking employment and help create a degree of stability by which individuals remove barriers to employment. Income supports, coupled with financial coaching, and contextualized skills based employment services reinforce one another and provide a multi-faceted approach to income and wealth building. An evaluation of our program found that bundled services – of which income supports are a component – [led to a 21% increase in individuals served being employed year-round](#), and more positive credit activity.

Question 1: Limiting ABAWD Waivers

We strongly support the current criteria by which states can suspend the ABAWD time limit, including the current measures that demonstrate “lack of sufficient jobs” and the flexibility to define the area requested in order to best respond to local needs. Many individuals subject to SNAP work requirements and the ABAWD time limit struggle to find employment even in normal economic times. States request waivers based on a variety of local economic conditions and needs ranging from acute unemployment in certain areas or long-term unemployment and recessions, to temporary circumstances such as natural disasters.[9] Limiting the criteria by which



a state can suspend the ABAWD time limit will hamper a state's ability to respond to immediate economic conditions and protect its residents.

Waivers Support Cross-Sector Collaboration

State and local leaders in the adult and postsecondary education and workforce development sectors have worked hard over the past several years to intentionally engage SNAP participants in their programming. This has meant amending state SNAP plans and building administrative and reporting infrastructures, as well as implementing new strategies and developing community based partnerships for SNAP E&T in order to deliver high-quality services. These efforts take time and require substantial resources and capacity to do well. Limiting a state's ability to request waivers may undermine efforts to support ABAWDs transition to meaningful work and self-sufficiency.

Employment, AWDs, and SNAP E&T in RI

Rhode Island's unemployment rate has declined significantly since 2014, but the state's workforce is not keeping up with the needs of the changing business environment. According to the 2016 Rhode Island Department of Labor and Training's Labor Market Information report, 55,500 adults were either unemployed or underemployed and looking for work. Jobs were available, but employers were unable to find candidates with the skills and relevant work experience required to fill available positions. A 2014 study by Georgetown University projects that 70% of jobs in Rhode Island will require some education beyond high school by 2020, while the Rhode Island Department of Education reports that more than 75,000 people lack a high school diploma. LISC's data show that over the past two years, 47% of Rhode Island's SNAP E&T participants had to delay job skills training to enroll in basic education components to improve reading, writing and math skills. Third party SNAP E&T providers routinely report that many of their SNAP clients with high school diplomas still struggle to read at the 6th grade level. ABAWDs in Rhode Island resemble many other AWD populations around the country. They lack the education, skills and credentials required by employers to be competitive in the job market, complicating efforts to comply with mandatory work requirements.

Rhode Island's statewide waiver expired on August 31, 2017 but due to extensions, only one town is not waived. The state's current ABAWD waiver expires on August 31, 2018 in 13 of 39 cities and towns. Next year, it is expected that additional, if not all, of the remaining 26 municipalities will also come from under the umbrella of the waiver. The State has requested a new waiver, effective September 1, 2018, that will cover 26 of the 39 Rhode Island cities/towns. Consequently, thirteen municipalities will be subject to the ABAWD rules. The state has opted for a fixed three-year time clock that runs September 1, 2017 to August 30, 2020. This means that every ABAWD in Rhode Island will be on the same 36-month timeline. It is estimated that there will be 10,000 non-exempt ABAWDs in the state once all areas have come off the waiver.

Few opportunities for job training exist in the municipalities coming off the waiver, leaving ABAWDs living in those areas with few options to comply with the mandatory work requirements. These areas of the state lack public transportation, save for extremely limited bus lines, make it difficult to impossible for ABAWDs without transportation to get to and from SNAP E&T and other programs offering qualifying activities, such as programs under the Workforce Innovation and Opportunity Act (WIOA).

Warwick and Newport are two cities transitioning off the waiver in August 2018. Warwick, the state's second largest city, and Newport, the state's third poorest city have only one SNAP E&T third party provider each. In these two critical areas, there are a limited number of entities offering



workforce development services to low-income, low skilled SNAP participants and neither city is home to one of the State's four American Job Centers. ABAWDs subject to the time limit, particularly those without transportation, will have an exceedingly difficult time complying with the ABAWD work requirements and are at high risk for losing their SNAP benefits and losing their food security. The state of Rhode Island needs flexibility to meet the needs of the evolving employment sector and its vulnerable people, and to develop a strategy to maximize SNAP E&T services, which are currently hamstrung by insufficient nonfederal dollars.

Question 2: Supporting ABAWDs Transition to Meaningful Work and Self-Sufficiency

A postsecondary credential is increasingly required for all but the lowest-paying jobs. A synthesis of the literature on what works in employment and training is unequivocal: "A post-secondary education, particularly a degree or industry-recognized credential related to jobs in demand, is the most important determinant of differences in workers' lifetime earnings and incomes." [10] The ever-changing domestic and global economics have raised the demand for highly productive workers trained in specific skills or credentials. As the demand for skilled workers continues to rise, supporting additional educational and training pathways must be a priority.

As an organization dedicated to the goals of individual prosperity and our community's economic well-being, we acknowledge that our existing workforce systems, which are chronically underfunded, are not often designed to serve the range of needs of all ABAWDs. Some ABAWDs will have substantial stabilization needs, e.g., safe housing, addiction services, domestic violence resistance, and as people surmount those barriers, access to a need as basic as food is paramount. The Government Accountability Office (GAO) found that SNAP participants subject to the ABAWD time limit are more likely than other SNAP participants to lack basic job skills like reading, writing, and basic math. [11] USDA has the power to incentivize states to adopt data-driven and innovative best practices for citizens grappling with hardship.

We urge the agency to consider ways to create a foundation for long-term economic success – including learning from workforce innovations like LISC's Financial Opportunity Centers and Bridges to Career Opportunities program. Subsidized and transitional jobs stabilize individuals and families by enabling them to earn needed income, reestablish connections to the workforce, and gain the experience and work history needed to find future employment. [12] Such jobs also stimulate local economies by putting money in consumers' pockets, while boosting productivity for employers participating in subsidy programs. These programs create much-needed supports but also require resources and capacity to make a difference. Successful supports such as these are at odds with proposals to expand the ABAWD time limit and forcing people to go hungry. Furthermore, mandating participation in our programs requires us to spend our time tracking attendance and not serving clients with the programs they need to succeed.

Incentivizing Innovation: Integrated Service Delivery

At our FOCs, which are based on an innovative program model developed by the Annie E. Casey Foundation, clients have access to integrated (or bundled) services. The standard training and placement services are available, but alongside those are financial coaching services designed to help clients manage their money in the short and long term and income support counseling that ensures that clients are accessing the social supports for which they are eligible. Economic stability is not just a matter of having a job; it requires that a person's income be enough to meet his or her expenses. Financial coaching helps clients make the most of their current income while they plan a course to increase their earnings prospects. The premise of FOCs is that these



bundled services lead to better employment outcomes and to better long-term economic outcomes for low-income workers.

Bundling services works. A [study of our model](#) found that though FOC participants faced substantial barriers to achieving financial stability, including low education levels, unemployment, a lack of assets, and limited or negative credit histories, integrated service delivery at FOCs:

- Increased year round employment among FOC participants by 21% in the second year of the program
- Made it less likely for participants to have debts unrelated to asset accumulation, such as medical or legal debts, child support arrears, or back taxes
- Helped participants build positive credit histories and helped certain subgroups improve their credit status – with greater impacts among individuals involved in financial and employment coaching.

WIOA set the stage for many states to begin to move in the direction of integrated service delivery and cross-sector collaboration. USDA programs like SNAP and SNAP E&T are critical pillars in effective workforce development strategies for high need populations. We believe that highlighting and incentivizing the coordination and adoption of innovative best practices may help states along the path of addressing the needs of the hard to serve and employ – many of whom overlap with the ABAWD population. Specifically, the role of contextualized skills training and financial coaching in self-sufficiency and financial stability cannot be understated.

Workforce Training in RI

In Rhode Island, LISC is working to build an infrastructure of participating workforce training partners to engage SNAP participants and other low-income individuals. Our goal is for participants to have the ability to opt in for a wide range of supportive services so that they are successful in the workforce. The LISC network serves nearly 1,000 SNAP recipients yearly, and those numbers are growing. Job placement data varies among the third party providers from 25% to 98%. Providers with lower job placement numbers tend to serve very low-skilled SNAP participants enrolled in basic education components as the first step along their career pathways. For example, Amos House, a workforce training partner, offers courses and counseling to advance financial literacy, provides necessary supports for participants to put their best foot forward, and offers contextualized academic training, literacy training, and workforce development programs in culinary, construction, and maintenance.

On August 31, 2018, Rhode Island's ABAWD waiver will expire in 13 of the state's 39 municipalities. LISC is working to expand the number of SNAP E&T third party providers to at least 25 in order to increase opportunities for those ABAWDs who will be subject to the time limit. Additionally, partnerships have been developed with RI Department of Education, the RI Governor's Workforce Board and the RI Department of Labor and Training to leverage state dollars being granted from these state agencies to SNAP E&T third party providers serving SNAP recipients. States like Rhode Island that are building out innovative systems and moving ABAWDs to become financially stable need sufficient time and flexibility to address their population's needs.

Question 3: Determination of 'Unfit for Employment' Exemption

We oppose restrictions on the conditions or indicators that cause a SNAP participant to be determined "unfit for employment" and exempted from the ABAWD time limit. Any additional burdens placed on state agencies or individuals to verify this status would only result in barriers to accessing much-needed food assistance. Many individuals characterized as ABAWDs have



significant barriers to employment. In a study of ABAWDs referred to participate in activities in Franklin County, Ohio, one-third of individuals reported having a “physical or mental limitation.”[13] Although some conditions may not meet the stringent standard to qualify the individual for a federal disability benefit, they still may have significant barriers to working 20 hours or more per week. The Bureau of Labor Statistics (BLS) reports that workers with disabilities are nearly twice as likely as workers with no disability to be employed part-time.[14]

The term “unfit for employment” is outdated, as we know that people with disabilities can and do work. However, the employment landscape may be significantly more challenging to navigate for individuals with disabilities. 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.[15] 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, any change to restrict the ABAWD definition of “unfit for employment” would result in the loss of crucial nutrition assistance for millions of low-income individuals.

Conclusion

The changes suggested in the ANPRM would result in many SNAP participants losing critical food assistance, which would create a barrier to finding and maintaining meaningful employment.[16] The ABAWD time limit does not strengthen opportunities for employment, and we are greatly concerned that the proposed changes expand the harsh time limit to many more SNAP participants, undermine their attempts to become economically stable, and decrease the ability of states to develop effective plans to address populations of high need. We strongly discourage USDA from implementing policies that will put many more individuals at risk of hunger and food insecurity, and move them further away from economic stability.

Thank you for the opportunity to provide comments. LISC looks forward to continuing to serve as a resource to the Department.

[1] Steven Carlson, Dorothy Rosenbaum, and Brynne Keith-Jennings, “Who Are the Low-Income Childless Adults Facing the Loss of SNAP in 2016?,” Center on Budget and Policy Priorities, February 2016, <https://www.cbpp.org/research/food-assistance/who-are-the-low-income-childless-adults-facing-the-loss-of-snap-in-2016>.

[2] U.S. Department of Agriculture, “SNAP Participation,” Food and Nutrition Service, March 2018, <https://fns-prod.azureedge.net/sites/default/files/pd/34SNAPmonthly.pdf>.

[3] Center on Budget and Policy Priorities, “Unemployed Adults Without Children Who Need Help Buying Food Only Get SNAP For Three Months,” <https://www.cbpp.org/unemployed-adults-without-children-who-need-help-buying-food-only-get-snap-for-three-months>.

[4] Ed Bolen, Dottie Rosenbaum, Stacy Dean, and Brynne Keith-Jennings, “More Than 500,000 Adults Will Lose SNAP Benefits in 2016 as Waivers Expire,” Center on Budget and Policy Priorities, March 2016, <https://www.cbpp.org/research/food-assistance/more-than-500000-adults-will-lose-snap-benefits-in-2016-as-waivers-expire>.

[5] Nune Phillips, “SNAP and Work,” Center for Law and Social Policy, January 2018, https://www.clasp.org/sites/default/files/publications/2018/01/2018_snapandwork.pdf.

[6] Center on Budget and Policy Priorities, “Chart Book: SNAP Helps Struggling Families Put Food on the Table,” February 2018, <https://www.cbpp.org/research/food-assistance/chart-book-snap-helps-struggling-families-put-food-on-the-table>.



- [7] Brynne Keith-Jennings and Raheem Chaudhry, “Most Working-Age SNAP Participants Work, But Often in Unstable Jobs,” Center on Budget and Policy Priorities, March 2018, <https://www.cbpp.org/research/food-assistance/most-working-age-snap-participants-work-but-often-in-unstable-jobs>.
- [8] National Employment Law Project, “The Low-Wage Recovery and Growing Inequality,” August 2012, <http://www.nelp.org/content/uploads/2015/03/LowWageRecovery2012.pdf>.
- [9] Ed Bolen and Stacy Dean, “Waivers Add Key State Flexibility to SNAP’s Three-Month Time Limit,” Center on Budget and Policy Priorities, February 2018, <https://www.cbpp.org/research/food-assistance/waivers-add-key-state-flexibility-to-snaps-three-month-time-limit>.
- [10] U.S. Department of Labor, “What Works In Job Training: A Synthesis of the Evidence,” July 2014, <https://www.dol.gov/asp/evaluation/jdt/jdt.pdf>.
- [11] U.S. General Accounting Office, “Food Stamp Employment and Training Program Better Data Needed to Understand Who Is Served and What The Program Achieves,” Government Accountability Office, March 2003, <https://www.gao.gov/assets/240/237571.pdf>.
- [12] Liz Ben-Ishai and Elizabeth Lower-Basch, “Job Creation and Quality,” Center for Law and Social Policy, August 2014, <https://www.clasp.org/sites/default/files/publications/2017/04/A-job-creation-and-job-quality-agenda-for-Labor-Day-1.pdf>.
- [13] Ohio Association of Foodbanks, “Franklin County Work Experience Program,” 2015, http://admin.ohiofoodbanks.org/uploads/news/ABAWD_Report_2014-2015-v3.pdf.
- [14] U.S. Department of Labor, “Persons with a Disability: Labor Force Characteristics—2016,” Bureau of Labor Statistics, June 2017, <https://www.bls.gov/news.release/pdf/disabl.pdf>.
- [15] U.S. Department of Labor, “Persons with a Disability: Barriers to Employment, Types of Assistance, and Other Labor-Related Issues—May 2012,” Bureau of Labor Statistics, April 2013, https://www.bls.gov/news.release/archives/dissup_04242013.pdf.
- [16] Jessica Gehr, “Doubling Down: How Work Requirements in Public Benefit Programs Hurt Low-Wage Workers,” Center for Law and Social Policy, June 2017, <https://www.clasp.org/sites/default/files/publications/2017/08/Doubling-Down-How-Work-Requirements-in-Public-Benefit-Programs-Hurt-Low-Wage-Workers.pdf>.