

Appendix R-10-B Public Comment 10 Attachment



New York City (NYC) submits this comment in response to the United States Department of Agriculture Food and Nutrition Service's (USDA FNS) request for comments on a proposed survey of SNAP and Work (OMB Number 0584-NEW).

The notice in the federal register outlines four topics on which comments are invited; this response addresses two of these topics:

- *Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility; and*
- *Ways to enhance the quality, utility, and clarity of the information collected.*

Practical Utility of the Information Collected

NYC's chief concern with the proposed survey is that it will *not* have practical utility. In the request for comments, the USDA FNS is opaque in its description of this survey, failing to provide details regarding survey questions, sampling methodology, exactly what the USDA FNS hopes to learn from this survey, and what the intended use of the results will be. Without such details, FNS is not providing a sufficient opportunity for comment on the proposal.

That said, based on the limited description that is provided, it appears that existing federal surveys—most notably the Survey of Income and Program Participation (SIPP) conducted by the United States Census Bureau—already collect far more useful information on SNAP participation and work than will be possible with this proposed survey. USDA FNS explains that the objectives of the proposed survey are to collect descriptive statistics on SNAP participant sociodemographic and economic characteristics; employment status and employment characteristics; workforce detachment; education and training; and health, social, and personal factors related to employment; as well as to examine associations between “key characteristics” and employment status adjusted for other relevant characteristics. Data to describe these statistics are presently collected by the SIPP. As described on USDA's Economic Research Service (ERS) webpage of *National Data Sets Useful in Food and Nutrition Assistance Research*:

The main objectives of the SIPP are to collect information on income by source, employment, program participation and eligibility, and general demographic characteristics.... Variables include labor force behavior; income; participation in public programs; basic demographic characteristics; living arrangements; food adequacy or abbreviated food security module; and participation at the individual level in the Food Stamp Program.¹

An example of how the SIPP has been used to understand the employment patterns of SNAP participants is a 2018 report produced by The Council of Economic Advisors on the topic of work requirements in non-

¹ *National Data Sets Useful in Food and Nutrition Assistance Research*. USDA ERS.
<https://www.ers.usda.gov/topics/food-nutrition-assistance/food-assistance-data-collaborative-research-programs/national-data-sets/> (last accessed Nov. 8, 2019).

cash benefits, which used 2014 SIPP data to investigate the number of hours worked by SNAP recipients.² Other examples include a 2018 report produced by the Center on Budget and Policy Priorities (CBPP) titled “Most Working-Age SNAP Participants Work, but Often in Unstable Jobs”³, and a 2017 report from Mathematica Policy Research titled “Supplemental Nutrition Assistance Program Participants’ Employment Characteristics and Barriers to Work.”⁴ The Mathematica study used the 2008-2013 panel of the SIPP, which includes interviews every four months with a representative sample of the non-institutionalized civilian US population. The authors of the Mathematica study found that “SNAP participants are strongly connected to the labor force, but many experience changes in employment and labor force participation over the course of a year. In addition, many SNAP participants who are not employed face significant barriers to work” (page vii). The CBPP study used the same SIPP panel and found similar employment patterns. The CBPP study noted that most SNAP-recipient adults work, but they work in jobs with low pay and shifting schedules; it also found that these low-wage workers were more likely to have periods of unemployment. These findings indicate that many adults participate in SNAP temporarily when they are between jobs, while longer-term SNAP recipients have steady jobs that are low-paying. These findings answer the exact kinds of questions that the proposed survey seeks to collect data to answer.

The proposed survey will be inferior to the SIPP in at least two critical ways. First, SIPP is a panel survey that tracks households over multiple years; therefore, SIPP data makes it possible to understand patterns of SNAP participation, employment, and wages over time, particularly the relationship of SNAP receipt to periods of unemployment. The proposed survey is a point-in-time snapshot conducted only once and it would not provide the level of information that the SIPP has already collected. As the CBPP report notes, point-in-time snapshots of SNAP participants “substantially overstate [] their joblessness”.⁵ Second, SIPP allows for comparisons between SNAP participants and nonparticipants, making it possible to understand which dynamics are limited to individuals and households receiving SNAP, and which are presenting larger trends in employment, workforce participation, and the economy. By contrast, while the sampling methodology outlined in the request for comments lacks sufficient details to allow for a full evaluation, it is apparent that the sampling methodology problematically excludes those who are not current SNAP participants even if they may have been participants in the recent past. This means data will not be collected on those who exit the program for a variety of reasons, including unemployed able-bodied adults without dependents (ABAWDs) who have been removed from SNAP after reaching their three-month limit. If this survey were to be conducted, the experience of this subpopulation should be included. Without including former SNAP participants and a comparison group of non-participants, this survey will not be generalizable to any group other than the current respondents and will not be a useful basis on which to create or amend policy.

² Council of Economic Advisers. July 2018. “Expanding Work Requirements in Non-Cash Welfare Programs.” <https://www.whitehouse.gov/wp-content/uploads/2018/07/Expanding-Work-Requirements-in-Non-Cash-Welfare-Programs.pdf>

³ Keith-Jennings B and Chaudhry R. March 2018. “Most Working-Age SNAP Participants Work, but Often in Unstable Jobs.” *Center on Budget and Policy Priorities*. <https://www.cbpp.org/sites/default/files/atoms/files/3-15-18fa.pdf>

⁴ Malbi J and Cheban I. July 2017. “Supplemental Nutrition Assistance Program Participants’ Employment Characteristics and Barriers to Work.” *Mathematica Policy Research*. <https://www.mathematica.org/our-publications-and-findings/publications/supplemental-nutrition-assistance-program-participants-employment-characteristics-and-barriers>

⁵ Keith-Jennings B and Chaudhry R., *supra* note 3, at 1.

Enhancing the Quality, Utility, and Clarity of the Information Collected

If this survey is conducted, it is critical that questions related to work stability, unpredictable scheduling, just-in-time scheduling, work-hour fluctuation, and general employment volatility be included. These questions are necessary to achieve a comprehensive understanding of how current labor market trends and employment practices that negatively affect low-income workers affect the work lives of SNAP recipients.^{6 7 8} These issues are rightfully drawing increased attention in current research and policy;⁹ therefore additional rigorous research into how these practices and trends affect SNAP recipients (and comparable non-recipients) would be an asset. Moreover, as the proposed survey plans to exclude those with a disability, it misses the opportunity to understand the way that people with disabilities—a quarter of all adults in the United States¹⁰—experience these current labor market trends.

Furthermore, research shows that SNAP recipients who do not work are especially disadvantaged and face substantial barriers to employment. Able-bodied adults in New York City who do not work are much more likely than the general US labor force to be members of racial or ethnic groups that face significant employment discrimination. Unemployed Able-Bodied Adults Without Dependents (ABAWDs) have lower levels of education than the general labor force: national data show that only half have a high school diploma or GED, another quarter have not completed high school.¹¹ Even more troubling, research conducted by the United States General Account Office has shown that many unemployed SNAP recipients enrolled in SNAP Education & Training programs “lack basic skills, such as reading” which severely hinders their employability and their ability to succeed in E&T programs.¹² Asking questions not only about SNAP recipients’ work histories, but also about their barriers to employment would increase the value and validity of the proposed survey, and would help to avoid misleading conclusions about reasons for unemployment.

NYC is also concerned about the plan to include adults aged 18 to 69 in this proposed survey. This is inconsistent with the SNAP program’s definition of working-age adults as those ages 18-59 for the purpose

⁶ Karpman M, Hahn H, and Gangopadhyaya A. June 2019. “Precarious Work Schedules Could Jeopardize Access to Safety Net Programs Targeted by Work Requirements.” *Urban Institute*.

<https://www.urban.org/research/publication/precious-work-schedules-could-jeopardize-access-safety-net-programs-targeted-work-requirements>

⁷ Keith-Jennings B and Chaudhry R. March 2018

⁸ Malbi J and Cheban I. July 2017

⁹ See, for example, New York City’s ‘Fair Workweek’ Law which took effect in November 2017.

<https://www1.nyc.gov/site/dca/workers/workersrights/fastfood-retail-workers.page>

¹⁰ Okoro C, Hollis N, Cyrus A, and Griffin-Blake S. August 17, 2018. “Prevalence of disabilities and health care access by disability status and type among adults – United States, 2016.” *Center for Disease Control and Prevention – Morbidity and Mortality Weekly Report*. <https://www.cdc.gov/mmwr/volumes/67/wr/mm6732a3.htm>

¹¹ Bolen, E, Rosenbaum, D, Dean, S, and Keith-Jennings, B. (2016). *More Than 500,000 Adults Will Lose SNAP Benefits in 2016 as Waivers Expire*. Center on Budget and Policy Priorities. Retrieved February 22, 2019 from <https://www.cbpp.org/research/food-assistance/more-than-500000-adults-will-lose-snap-benefits-in-2016-as-waiverexpire>

¹² United States General Accounting Office. March 2003. *Food Stamp Employment and Training Program: Better Data Needed to Understand Who is Served and What the Program Achieves*. Report to Congressional Requesters. GAO-03-388.

of general work requirements and ages 18-49 for the purpose of ABAWDs' work requirements.¹³ No federal benefits programs consider 69-year-olds to be working age. For example, the ages of Medicaid recipients with work requirements vary from state to state, with the upper limit ranging from 49 (in Arizona, Arkansas and Wisconsin) to 64 (Kentucky, Tennessee and Virginia).¹⁴ In no state are Medicaid-recipient adults aged 65-69 considered working-age. Supplemental Security Income for nondisabled adults is available to those aged 65 and over.¹⁵ The Social Security Administration sets the normal retirement age at 66 for those born 1943-1959 and 67 for those born 1960 and later,¹⁶ and nearly half of all Social Security retirees claim benefits before age 65.¹⁷ Crucially, low-income older adults—particularly Black, Hispanic, and less-educated older adults—face many barriers to employment, including ageism, racism, skill gaps, and chronic disability.^{18 19} With all of this in mind, including those between 49 and 69 years of age in the SNAP and Work survey is likely to overstate unemployment among SNAP participants and mischaracterize the degree to which SNAP recipients are disconnected from the labor force.

Sincerely,



Steven Banks
Commissioner
Department of Social Services, HRA-DHS

¹³ USDA Food and Nutrition Service, "Supplemental Nutrition Assistance Program (SNAP): SNAP Work Requirements" <https://www.fns.usda.gov/snap/work-requirements> (last accessed Nov. 25, 2019).

¹⁴ National Academy for State Health Policy. October, 2019. "A Snapshot of State Proposals to Implement Medicaid Work Requirements Nationwide." <https://nashp.org/state-proposals-for-medicaid-work-and-community-engagement-requirements/>

¹⁵ Supplemental Security Income (SSI). <https://www.benefits.gov/benefit/4412> (last accessed Nov. 14, 2019).

¹⁶ Social Security Administration "Retirement Benefits" 2019. <https://www.ssa.gov/pubs/EN-05-10035.pdf>

¹⁷ Center on Budget and Policy Priorities. August 2018. "Taking Away Medicaid for Not Meeting Work Requirements Harms Older Americans." <https://www.cbpp.org/sites/default/files/atoms/files/2-20-18health.pdf>

¹⁸ Ibid.

¹⁹ Anderson K, Richardson V, Fields N, and Harootyan R. 2013. "Inclusion or Exclusion? Exploring Barriers to Employment for Low-Income Older Adults." *Journal of Gerontological Social Work*. 56:4, 318-334.