

LOS ANGELES REGIONAL



Fighting Hunger. Giving Hope.

November 8, 2019

The Office of Management and Budget  
725 17th Street, NW  
Washington, DC 20503

The Los Angeles Regional Food Bank is a nonprofit organization based in Los Angeles, California. Our mission is to mobilize resources to fight hunger in our local community. Our organization pays very close attention to the Supplemental Nutrition Assistance Program (SNAP) because SNAP plays a critical role in addressing hunger and food insecurity in our community and is the first line of defense against hunger for the majority of our low-income clients. We care about the three-month time limit because this policy has cut off food assistance to so many in our community who are in need just because they are unable to find a reliable 20-hour-a-week job. In the Los Angeles metro area, we are experiencing a significant increase in the homeless population due to rising housing costs and other factors. Many of the adults living on the street, in their cars, in shelters or other housing. Continuing to serve this population as well as others who fit the ABAWD category is critical.

As of 2019, there are over 60,000 individuals experiencing homelessness in LA County, and over 2 million people are experiencing food insecurity. Through our current services we are able to serve over 300,000 households per month, however we are at capacity and any influx in need would drastically impact our services. The Commission for Public Social Services in LA County estimates that over 61,000 ABAWDs would be impacted, and if all of those individuals turned to our food pantry network for their food needs, we would not be able to accommodate for everyone's needs, as the number of impacted individuals would result in a 20% increase in the number of people we are serving. The counterargument would be that those individuals could stay on benefits if they meet the 20 hour-a-week work requirement, however there are many barriers in the job market which already restrict access in certain communities. In particular, our area's extremely high cost of living (housing, food costs, and utility costs) means that individuals relying on low-income part-time work are living right on the edge, where any one problem could push them either out of the area or into homelessness.

With over 5,000 square miles, our county's geography and transit systems are barriers to access within the job market, with the mean commute time at 30 minutes, and 25% of commuters spending over 40 minutes one-way. Our public transit is only utilized by 6% of commuters on their way to work, so many individuals have to pay expensive car payments in order to be able to participate in the job market, which exacerbates their already tight budget. We know that certain areas within the county would be disproportionately impacted, particularly in communities of color where African American unemployment is nearly twice as high (17%) as White employment (9%), even when controlling for education. Finally, the majority of the jobs in the market are part-time (53%) and include many retail jobs that lack set work schedules (80%) while 30% have no guarantee on hours.

Federal law limits SNAP (called CalFresh here in California) eligibility for childless unemployed and underemployed adults age 18-50 (except for those who are exempt) to just three months out of every three years unless they are able to obtain and maintain an average of 20 hours a week of employment. This rule is harsh and unfair. It harms vulnerable people by denying them food benefits at a time when they most need it and it does not result in increased employment and earnings. At least 500,000 low-income individuals nationwide lost SNAP in 2016 due to the time limit. This put their food security at risk. And, by time-limiting food assistance to this group, federal law has shifted the burden of providing food to these unemployed individuals from SNAP to local charities

While this request for comment appears to be open to suggestions on how to make the time limit less harsh via administrative action, we are concerned that the Administration seeks only to make the rule more draconian: to expand the scope of the cutoff and to eliminate the little flexibility states have to limit the damage of the rule. The Department's stance on the time limit is not one that our organization shares. The Secretary of Agriculture has suggested that they need to "remove those waivers for able-bodied adults without dependents," because "it's become a lifestyle for some people." USDA's budget has proposed making the time limit harsher by repealing states' flexibility to exempt certain individuals and most high unemployment areas from the time limit and exposing more people to this punitive policy. As a result, we are deeply concerned that this request for comment is part of an administrative effort to make the time limit even harsher.

We strongly oppose any administrative action by USDA that would expose more people to this cutoff policy. Under the law, states have the flexibility to waive areas within the state that have experienced elevated unemployment. The rules governing areas' eligibility for waivers have been in place for nearly 20 years and every state except Delaware has availed themselves of waivers at some point since the time limit became law. The waiver rules are reasonable, transparent, and manageable for states to operationalize. Any change that would restrict, impede, or add uncertainty to our state's current ability to waive areas with elevated unemployment must not be pursued.

The request for comment also seems to suggest that potential improvements to other aspects of the time limit policy, such as individual exemption policy, would justify weakening states' flexibility to waive the time limit in areas with elevated unemployment. This logic is unfounded. Our state's current ability to exempt certain individuals from the rule is important, but is wholly insufficient and could never make up for having to apply the time limit in areas with elevated unemployment. And, the underfunded workforce system and SNAP employment and training programs are not designed or well suited to meet the job training requirements under this rule. Put simply, there is no justification for weakening current waiver rules and exposing more vulnerable people to this SNAP eligibility cutoff.

The only action we encourage USDA to take with respect to this time limit rule that impacts Able-Bodied Adults Without Dependents is to propose its elimination. Restoring SNAP's ability to provide food assistance to impoverished unemployed people would be a powerful policy improvement that would reduce food insecurity among those seeking work.

Sincerely,

Michael Flood  
President/CEO  
Los Angeles Regional Food Bank