



Board of County Commissioners

April 10, 2019

Certification Policy Branch
Program Development Division
Food and Nutrition Service, USDA
3101 Park Center Drive
Alexandria, Virginia 22302

RE: Proposed Rule: Supplemental Nutrition Assistance Program (SNAP): Requirements for Able-Bodied Adults Without Dependents RIN 0584-AE57

To the Certification Policy Branch:

The Boulder County Board of County Commissioners submits these comments in response to the U.S. Department of Agriculture's (USDA) Notice of Proposed Rulemaking regarding Able-Bodied Adults Without Dependents (ABAWDs) in the Supplemental Nutrition Assistance Program (SNAP). We write to express our strong opposition to the proposed changes and urge the USDA to withdraw the proposed rule in its entirety.

Boulder County currently provides SNAP benefits to about 27,000 people, out of an overall population of 320,000. SNAP is one of the most important resources we can provide to individuals who are struggling to make ends meet and being forced to make daily choices about which basic necessities to forego. Even so, there are many in our community living on the edge who are choosing not to claim SNAP benefits for which they are eligible due to existing program restrictions and policies that discourage participation. The proposed rule would only make this situation worse. If anything, we should be finding ways to encourage eligible individuals to participate in SNAP, not discourage them.

The proposed rule runs counter to Boulder County's experience that the vast majority of individuals participating in SNAP want to work and want to be self-sufficient. The reasons for which they might require ongoing assistance are complex and varied and cannot be solved through a simple ratcheting up of work requirements. Issues such as a lack of training or education, lack of access to reliable transportation, and past criminal convictions all present obstacles to self-sufficiency that the proposed rule fails to address. Indeed, the most likely effect of the proposed rule would be to compound these challenges and lead to worse outcomes for participants and the community alike. Current requirements for establishment of ongoing eligibility to receive SNAP benefits already provide significant disincentives for all but the truly needy to participate in the program.

Lastly, Boulder County is concerned that under the proposed rule, administrative costs will increase. At a time of increasing need but limited funding, every effort should be made to maximize the share of resources that are targeted at direct benefits and services, as opposed to paying for new administrative requirements that won't improve outcomes for individuals or the community at large.

Deb Gardner *County Commissioner*

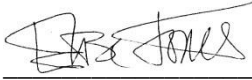
Elise Jones *County Commissioner*

Matt Jones *County Commissioner*

In summary, the proposed rule presents a significant threat to the health and well-being of some of the most vulnerable members of our population, while failing to demonstrate any benefit. For those reasons, we oppose the rule and respectfully ask that it be withdrawn.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Elise Jones", written over a horizontal line.

Elise Jones
Chair

A handwritten signature in black ink, appearing to read "Deb Gardner", written over a horizontal line.

Deb Gardner

A handwritten signature in black ink, appearing to read "Matt Jones", written over a horizontal line.

Matt Jones