



University of California

Agriculture and Natural Resources | Nutrition Policy Institute

April 2, 2019

Certification Policy Branch
Program Development Division
USDA Food and Nutrition Service
3101 Park Center Drive
Alexandria, VA 22302
Re: FNS-2018-0004-5999
RIN 0584-AE 5

Dear Certification Policy Branch, Program Development Division:

The Nutrition Policy Institute, within the University of California's Division of Agriculture and Natural Resources, submits this comment in strong opposition to the USDA Food and Nutrition Service proposed rule, dated February 1, 2019, with regard to requirements for the eligibility of able-bodied adults without dependents (ABAWDs) to Supplemental Nutrition Assistance Program (SNAP) benefits.

For nearly twenty years, researchers at the Nutrition Policy Institute (NPI) have engaged in research to improve nutrition policy in California and the nation, with special emphasis on the challenges for low-income communities and individuals in accessing a healthy diet. Taking a public-health approach, NPI focuses much of its work on low-income individuals and families, for whom a disease-prevention approach has been shown to improve health and wellbeing and decrease healthcare costs. Seeking to improve nutrition and health for the largest number of low-income individuals, NPI studies have documented the benefits of federal food programs in enhancing population nutrition and reducing food insecurity. Because low-income families are at the heart of so much that NPI does, NPI has deep interest in the predictably damaging consequences of the proposed rule to implement stricter work requirements for participation by ABAWDs in SNAP.

Many of the thousands of comments submitted to date highlight the critical importance of SNAP for low-income individuals, for their nutrition and health, and for their opportunity to live productive lives. While NPI agrees fully with those observations, the present comment uses a different lens, focusing on a recent analysis that examines the economic benefits and thus highlights the dire consequences the proposed rule would have for the broader community.

One recent study shows that in the State of California more than \$6 billion each year goes directly into the state's economy from SNAP benefits quickly spent by more than 4 million SNAP participants. On top of this, an additional \$5 billion each year is generated by SNAP-related business transactions in the state, supporting farmers, grocers, truckers, packers, and other businesses, helping them to be profitable and competitive. That means that SNAP benefits account for a total of \$11 billion annually in economic

activity in California alone. This revenue is critical to the economic viability of California agriculture as well as of low income and rural communities. By eliminating most ABAWDs from the program, their benefits would be lost to the state, and these individuals' food needs and likely resulting increased healthcare costs would become a responsibility of the state and of the local communities – many with high rates of unemployment and fewer resources – where the ABAWDs live.

A University of California study demonstrates that SNAP, by helping individuals with food, contributes to keeping them healthy and thereby reducing healthcare costs. According to the study, SNAP participants in California incur \$1,400 less in healthcare costs per year than non-participants, saving taxpayers more than \$5 billion each year. Given that some children share living space with ABAWDs, the loss of eligibility by ABAWDs inevitably will diminish food resources for the children. Thus the relevance of an additional study by UC researchers that documents how SNAP participation during childhood is associated with improved health and productivity of adults. Adults who received SNAP benefits during childhood were likely to have better jobs as a result of improved nutrition and academic performance. Further these adults were more likely to have lower rates of obesity, diabetes, and high blood pressure, thus reducing healthcare costs.

Thus, these studies document how SNAP benefits impact the whole community, supporting productive adults who can help build vibrant local economies, while incurring lower healthcare costs. With reductions in SNAP benefits intended for ABAWDs, often those who need them most, communities throughout the state will be impacted by job loss, causing thousands of families to become food insecure, with adverse nutrition and health consequences that undermine the state's economy. Supporting adults to participate in the labor force is good policy, but pulling away the safety net from people who are struggling is not the right approach.

In light of the severely harmful impact this proposed rule would have on our communities' economic vitality, NPI registers its strong opposition to the proposed rule.

Sincerely



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