



# City of Seattle

Mayor Jenny A. Durkan

Submitted via [www.regulations.gov](http://www.regulations.gov)

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

We strongly oppose the proposed rule due to its disproportionate impact on protected classes including immigrants and communities of color.

## **BACKGROUND**

The City of Seattle considers the Supplemental Nutrition Assistance Program (SNAP) as our nation's most important anti-hunger program, providing food assistance to vulnerable communities, including young people, working families, people with disabilities, people of color, seniors, and many more. In the U.S., SNAP helps approximately 39 million people in nearly 20 million households access nutritious meals.<sup>1</sup> In 2015, SNAP lifted approximately 2.1 million African Americans, including 1 million children,<sup>2</sup> and an estimated 2.5 million Latinos, including 1.2 million children, out of poverty.<sup>3</sup> More than ten percent of Asian and Pacific Islander (API) families receive SNAP benefits,<sup>4</sup> while many more are likely eligible but unenrolled due to cultural stigma and insufficient program outreach to API groups.<sup>5</sup>

In Seattle, SNAP helps nearly 77,000 residents, or 11 percent of the city's population.<sup>6</sup> And Seattle submits this comment knowing that we are part of a state and a region where hunger levels are

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<sup>1</sup> U.S. Department of Agriculture, "SNAP Participation," Food and Nutrition Service, September 2018, <https://fns-prod.azureedge.net/sites/default/files/pd/34SNAPmonthly.pdf>.

<sup>2</sup> "SNAP Helps Millions of African Americans," *Center on Budget and Policy Priorities*, updated February 2018, <https://www.cbpp.org/research/food-assistance/snap-helps-millions-of-african-americans>.

<sup>3</sup> "SNAP Helps Millions of Latinos," *Center on Budget and Policy Priorities*, updated February 2018, <https://www.cbpp.org/research/food-assistance/snap-helps-millions-of-latinos>.

<sup>4</sup> "Congressional Tri-Caucus Denounces Cuts to the Supplemental Nutrition Assistance Program (SNAP)," *Congressional Asian Pacific American Caucus*, September 2013, <https://capac-chu.house.gov/press-release/congressional-tri-caucus-denounces-cuts-supplemental-nutrition-assistance-program-snap>

<sup>5</sup> Victoria Tran, *Asian Americans are Falling Through the Cracks in Data Representation and Social Services*, Urban Institute, June 2018, <https://www.urban.org/urban-wire/asian-americans-are-falling-through-cracks-data-representation-and-social-services>.

<sup>6</sup> Washington State Department of Health and Social Services Client Data portal. <http://clientdata.rda.dshs.wa.gov/Home/ShowReport?reportMode=0>

unacceptably high. In Washington State, SNAP helps 929,000 Washington residents, or 13 percent of the state population put food on their tables.<sup>7</sup>

More locally, the total number of people enrolled in SNAP in Seattle, according to Public Health – Seattle & King County is **83,582**; the number of non-citizens enrolled in SNAP in Seattle is approximately **9,300**; and the total dollar amount provided to those 9,300 non-citizens is **\$10.9 million** in the year.

### **SNAP ALREADY HAS IN PLACE UNREASONABLY HARSH TIME LIMITS AND WORK REQUIREMENTS**

Federal law currently limits non-disabled adults ages 18-49 without dependent children to just three months of SNAP in a 36-month period unless they engage in work or job training activities at least half time.<sup>8</sup> The current rule is already unreasonably harsh and unfair. Requiring a set number of work hours to be documented each month already causes many eligible people to lose needed assistance—particularly workers juggling multiple jobs and unpredictable, constantly fluctuating work schedules. When several states reinstated this time limit in 2016 after suspending it due to the Great Recession of the early 2000s, at least 500,000 people lost SNAP benefits.<sup>9</sup>

Seattle was among the localities that lost the ability to request a waiver of this time limit due to our unemployment rate below the threshold. The likely result is that many residents who are searching for but unable to find full employment within 3 months have been denied SNAP benefits. In 2017, 11,000 fewer Seattle residents received SNAP assistance compared to 2015.<sup>10</sup> Due to the demographic disparities in employment that will be described further below, this reduction likely had a disproportionate impact on protected classes.

The loss of SNAP benefits in these communities did not result in the elimination of their hunger. These communities turned further to local emergency supports like food banks and meal programs, which have seen increases in demand for their services. While Seattle is committed to supporting the basic needs of our residents, our local social services are not equipped to take the place of federal nutrition supports.

Many more regions will now be required to reinstate the time limit if the proposed rule goes into effect. Time limits harm vulnerable people by denying them food benefits at a time when they need it the most.

People subject to the time limit are demographically diverse. Among adults subject to the time limit and who reported their race, approximately 52 percent are people from communities of color, including an

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<sup>7</sup> Catlin Nchako and Lexin Cai, *A Closer Look at Who Benefits from SNAP: State-by-State Fact Sheets*, Center on Budget and Policy Priorities, December 2018, <https://www.cbpp.org/research/food-assistance/a-closer-look-at-who-benefits-from-snap-state-by-state-fact-sheets#Washington>

<sup>8</sup> 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>.

<sup>9</sup> Ed Bolen, Dottie Rosenbaum, Stacy Dean, et al., *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>.

<sup>10</sup> Washington State Department of Health and Social Services Client Data portal. <http://clientdata.rda.dshs.wa.gov/Home/ShowReport?reportMode=0>

estimated 35 percent who are African American and 13 percent who are Latino.<sup>11</sup> Forty-seven percent of the people subject to the time limit are ages 18 to 29, and approximately 85 percent have at most a high school diploma or equivalent. An estimated 45 percent of the people subject to the time limit are women.<sup>12</sup> People subject to the time limit face considerable employment challenges, including a lack of reliable transportation, unstable housing arrangements, engagement with the criminal justice system, unstable work histories, or undiagnosed physical or mental limitations.<sup>13</sup>

### **IMMIGRANT PARTICIPATION IN SNAP IS CURRENTLY DECLINING AND IMMIGRANT ELIGIBILITY FOR SNAP IS CURRENTLY EXTREMELY LIMITED**

Following passage of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (“PRWORA”), a person must be a U.S. citizen or an eligible, lawfully-present non-citizen to qualify for SNAP benefits. Non-citizens are rarely eligible for SNAP and undocumented immigrants never are. But certain legal immigrants may be eligible if they fulfill other requirements. For example, many immigrants present in the U.S. legally may be eligible for SNAP after they are in the country for five years, if they meet other requirements.<sup>14</sup>

The requirements for who is eligible to enroll in SNAP haven’t changed but immigrant households legally eligible for SNAP benefits stopped participating in the program at a higher-than-normal rate in 2018.<sup>15</sup> The Trump Administration’s anti-immigrant rhetoric and policies are driving low-income immigrant families away.<sup>16</sup> Recent data presented at the 2018 American Public Health Association Annual Conference shows after a decade of steady increases a 10 percent drop in enrollment has occurred nationwide among immigrant families eligible for SNAP, despite there being no legal reason explaining this decrease.<sup>17</sup> The study’s Lead researcher and Deputy Director of Policy Strategy for Boston Medical Center’s Children’s HealthWatch Allison Bovell-Ammon said in a press release, “We believe the drop in participation may be related to more nuanced changes in national immigration rhetoric and increased federal action to deport and detain immigrants. These findings demonstrate that rhetoric and the threat of policy changes, even before changes are enacted, may be causing families to forego nutrition assistance.”

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<sup>11</sup> 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>.

<sup>12</sup> Ibid.

<sup>13</sup> Ibid. 8.

<sup>14</sup> *Supplemental Nutrition Assistance Program: Guidance on Non-Citizen Eligibility*, U.S. Department of Agriculture, June 2011, [https://fns-prod.azureedge.net/sites/default/files/snap/Non-Citizen\\_Guidance\\_063011.pdf](https://fns-prod.azureedge.net/sites/default/files/snap/Non-Citizen_Guidance_063011.pdf).

<sup>15</sup> Allison Bovell-Ammon, “Trends in Food Insecurity and SNAP Participation Among Immigrant Families of U.S. Born Young Children,” *Children’s HealthWatch*, November 2018, <http://childrenshealthwatch.org/study-following-10-year-gains-snap-participation-among-immigrant-families-dropped-in-2018/>.

<sup>16</sup> Helena Bottemiller Evich, “Immigrant Families Appear to be Dropping Out of Food Stamps,” *POLITICO*, November 2018, <https://www.politico.com/story/2018/11/14/immigrant-families-dropping-out-food-stamps-966256>

<sup>17</sup> “Study: Following 10-year gains, SNAP participation among immigrant families dropped in 2018,” American Public Health Association, November 2018, <https://www.apha.org/news-and-media/news-releases/apha-news-releases/2018/annual-meeting-snap-participation>

In general, immigrants are often unaware of the SNAP program or are confused about their eligibility for benefits.<sup>18</sup> Many immigrants in mixed-status families are not aware that some of their family members are eligible for SNAP, and immigrants face complicated administrative burdens due to caseworkers' lack of familiarity with foreign identity documents.<sup>19</sup> In fact, federal agencies have been working to overcome the barriers immigrants face to enrolling in benefits rather than adopting policies such as this proposal, which will only exacerbate current disparities in immigrant access to the SNAP program.<sup>20</sup> Given SNAP's record of alleviating poverty and food insecurity and improving health and employment outcomes, the USDA should be working to remove the barriers immigrant families face in accessing SNAP rather than further restricting access and increasing disparities for immigrant families, especially since other research demonstrates that safety net programs such as SNAP have short and long-term health benefits and are crucial levers to reducing the intergenerational transmission of poverty.<sup>21</sup>

### **PROPOSAL WOULD HAVE A DISPARATE IMPACT ON PEOPLE OF COLOR AND IMMIGRANTS**

We strongly oppose the proposed rule due to its disproportionate impact on protected classes including immigrants and communities of color. USDA itself acknowledges that the rule will have a disparate impact, noting that the proposed changes “have the potential for disparately impacting certain protected groups due to factors affecting rates of employment of these groups, [it] find[s] that implementation of mitigation strategies and monitoring by the Civil Rights Division of FNS will lessen these impacts.” Despite this, USDA provides no explanation of the mitigation strategies and monitoring, and the City does not believe that mitigation strategies can be significant enough to fully address the disproportionate impact of increased food insecurity and poverty on protected classes. We believe this is a deeply troubling omission given that rates of food insecurity are already higher than the national average for African American and Latino headed households.<sup>22</sup>

A reduction in time limit waivers and the resulting loss in SNAP benefits will disproportionately affect certain protected classes based on (a) an inadequate method for determining lack of sufficient jobs, a criterion for approving time limit waivers; and (b) the disproportionate rate of unemployment and underemployment for people of color.

### ***Unemployment Rate Should Not Predominantly Determine Waivers***

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<sup>18</sup> Susan Bartlett, Nancy Burstein, William Hamilton, et al., *Food Stamp Access Study: Final Report*, U.S. Department of Agriculture, November 2004, <https://naldc.nal.usda.gov/download/45671/PDF>.

<sup>19</sup> Krista M. Perreira, Robert Crosnoe, Karina Fortuny, et al., *Barriers to Immigrants' Access to Health and Human Services Programs*, U.S. Department of Health and Human Services, May 2012, <https://aspe.hhs.gov/system/files/pdf/76471/rb.pdf>.

<sup>20</sup> Robert Crosnoe, Juan Manuel Pedroza, Kelly Purtell, et al., *Promising Practices for Increasing Immigrants' Access to Health and Human Services*, U.S. Department of Health and Human Services, May 2012, <https://aspe.hhs.gov/system/files/pdf/76471/rb.pdf>.

<sup>21</sup> Page, Marianne, “Safety Net Programs Have Long-Term Benefits for Children in Poor Households,” Policy Brief, University of California, Davis, 2017. Available at [https://poverty.ucdavis.edu/sites/main/files/file-attachments/cpr-health\\_and\\_nutrition\\_program\\_brief-page\\_0.pdf](https://poverty.ucdavis.edu/sites/main/files/file-attachments/cpr-health_and_nutrition_program_brief-page_0.pdf)

<sup>22</sup> Alisha Coleman-Jensen, Matthew P. Rabbitt, Christian A. Gregory, et al., *Household Food Security in the United States in 2016*, U.S. Department of Agriculture, September 2017, <https://www.ers.usda.gov/webdocs/publications/84973/err-237.pdf>.

USDA suggests that insufficient jobs are reflected in unemployment data, but that data excludes key evidence, such as unemployed persons who searched for work in the previous year, but not in the past four weeks, and workers who are part-time for economic reasons. According to Bureau of Labor Statistics data, African Americans are twice as likely than white people to have searched for work in the previous year but not in the past 4 weeks, and Latinos are 66 percent more likely than white people to work part-time for economic reasons.<sup>23</sup> These and other data points suggest that the proposed core standard for determining lack of sufficient jobs and unemployment data disproportionately impacts protected classes.

### ***Epecially in the United States, Racial Income Disparities Persist***

Due to persisting racial economic disparities and discrimination in hiring practices, average hourly wages for African American and Latino workers are substantially lower than their white counterparts.<sup>24</sup> In 2017, for adults age 18-64, the poverty rate of the general population is 11 percent. That percentage is significantly higher for Latinos who have a poverty rate of 15 percent and even higher for African Americans who have a poverty rate of 18 percent.<sup>25</sup> This makes it more likely that African American and Latino individuals will benefit from programs that support work by helping them access nutritious food. The same is true for certain subgroups of Asian and Pacific Islanders that are particularly at risk of poverty, such as Marshallese (41 percent poverty rate), Burmese (38 percent), Hmong (26.1 percent) and Tongans (22.1 percent).<sup>26</sup> As discussed in more detail in the sections that follow, many immigrants and people of color subject to the time limit face employment challenges.

### ***NPRM Fails to take into Account that Employment Discrimination Limits Access to the Workforce for Many Immigrants and People of Color***

USDA fails to acknowledge studies that show that racial discrimination remains a key force in the labor market.<sup>27</sup> A 2013 study submitted fake resumes of nonexistent recent college graduates through online job applications for positions based in Atlanta, Baltimore, Portland, Oregon, Los Angeles, Boston, and Minneapolis. African-Americans were 16 percent less likely to get called in for an interview.<sup>28</sup> Similarly, a 2017 meta-analysis of field experiments on employment discrimination since 1989 found that white

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<sup>23</sup> "People in the Labor Force and Not in the Labor Force by Selected Characteristics, 2017 Annual Averages," U.S. Bureau of Labor Statistics, <https://www.bls.gov/opub/reports/race-and-ethnicity/2017/home.htm>; "Employed and Unemployed Full- and Part-time Workers by Age, Sex, Race, and Hispanic or Latino Ethnicity," U.S. Bureau of Labor Statistics, December 2018, <https://www.bls.gov/cps/cpsaat08.htm>.

<sup>24</sup> Eileen Patten, "Racial, Gender Wage Gaps Persist in U.S. Despite Some Progress," Pew Research Center, July 2016, <http://www.pewresearch.org/fact-tank/2016/07/01/racial-gender-wage-gaps-persist-in-u-s-despite-some-progress/>.

<sup>25</sup> "POV-01. Age and Sex of All People, Family Members and Unrelated Individuals Iterated by Income-to-Poverty Ratio and Race," U.S. Census Bureau, 2017, <https://www.census.gov/data/tables/time-series/demo/income-poverty/cps-pov/pov-01.html>.

<sup>26</sup> "American Community Survey 2015 Five Year Estimates, table DP03," U.S. Census Bureau, 2015, <https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=bkmmk>.

<sup>27</sup> Robert Manduca, *Income Inequality and the Persistence of Racial Economic Disparities*, Sociological Science, March 2018, [https://www.sociologicalscience.com/download/vol-5/march/SocSci\\_v5\\_182to205.pdf](https://www.sociologicalscience.com/download/vol-5/march/SocSci_v5_182to205.pdf).

<sup>28</sup> "Brett Arends, "In Hiring, Racial Bias is Still a Problem. But Not Always for Reasons You Think," Fortune, November 2014, <http://fortune.com/2014/11/04/hiring-racial-bias/>.

Americans applying for jobs receive on average 36 percent more callbacks than African Americans and 24 percent more callbacks than Latinos.<sup>29</sup> In a 2004 study, “Are Emily and Greg more employable than Lakisha and Jamal: A Field Experiment on Labor Market Discrimination,” researchers randomly assigned names and quality to resumes and sent them to over 1,300 employment advertisements. Their results revealed significant differences in the number of callbacks each resume received based on whether the name sounded stereotypically white or stereotypically African American. More recent research indicates that this bias persists. Employment outcomes also vary between immigrant groups from different regions. A 2007 study found that immigrants from Latin America and the Caribbean earned an average hourly wage rate of \$14, compared to \$24 among other immigrants, and \$20.4 for non-immigrants.<sup>30</sup>

### ***The Structural Shift Toward Involuntary Part-Time Work Has Negatively Impacted Latino and African American Workers and Increased Racial Disparities***

Despite wanting to work more, many low-wage workers struggle to receive enough hours from their employer to make ends meet. A report from the Economic Policy Institute found that 6.1 million workers were involuntarily part-time; they preferred to work full-time but were only offered part-time hours. According to the report, “involuntary part-time work is increasing almost five times faster than part-time work and about 18 times faster than all work.”<sup>31</sup>

Latino and African American workers are relatively much more likely to be involuntarily part-time (6.8 percent and 6.3 percent, respectively) than white workers, of whom just 3.7 percent work part-time involuntarily. And African American and Latino individuals are disproportionate shares of involuntary part-time workers, together representing 41.1 percent of all involuntary part-time workers. The greater amount of involuntary part-time employment among African Americans and Latinos is due to their both having a greater inability to find full-time work and facing more work conditions where hours are variable and can be reduced without notice.<sup>32</sup>

### ***People of Color in the U.S. are More Likely to Live in Neighborhoods with Poor Access to Jobs***

In recent years, majority-minority neighborhoods have experienced particularly pronounced declines in job proximity. Proximity to jobs can affect the employment outcomes of residents and studies show that people who live closer to jobs are more likely to work.<sup>33</sup> They also face shorter job searches and spells of

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<sup>29</sup> Lincoln Quillian, Devah Pager, Ole Hexel, et al., *Meta-Analysis of Field Experiments Shows No Change in Racial Discrimination in Hiring over Time*, PNAS October 10, 2017 114 (41) 10870-10875, September 2017, <https://doi.org/10.1073/pnas.1706255114>.

<sup>30</sup> Francisco Rivera-Batiz, *How Do Migrants from Latin America and the Caribbean Fare in the US Labour Market?*, The World Economy, February 2007, <http://citeseerx.ist.psu.edu/viewdoc/download?doi=10.1.1.535.6115&rep=rep1&type=pdf>.

<sup>31</sup> Lonnie Golden, “Still Falling Short on Hours and Pay,” Economic Policy Institute, December 2016, <http://www.epi.org/publication/still-falling-short-on-hours-and-pay-part-time-work-becoming-new-normal/>.

<sup>32</sup> Ibid.

<sup>33</sup> Scott W. Allard and Sheldon Danziger, *Proximity and Opportunity: How Residence and Race Affect the Employment of Welfare Recipients*, Housing Policy Debate, September 2000, <https://pdfs.semanticscholar.org/4936/dfd925b78d9e81f8d5d44b95b6a15f8ba0ab.pdf>.



joblessness.<sup>34</sup> As residents from households with low-incomes and communities of color shifted toward suburbs in the 2000s, their proximity to jobs decreased. Between 2000 and 2012, the number of jobs near the Latino and African American residents in major metropolitan areas declined much more steeply than for white residents.<sup>35</sup>

***Due to the Overcriminalization of Neighborhoods of Color, People of Color Are More Likely to Have Previous Histories of Incarceration, which in turn Limits their Job Opportunities***

People of color, particularly African Americans and Latinos, are unfairly targeted by the police and face harsher prison sentences than their white counterparts.<sup>36</sup> National data show that African Americans and Latinos are three times more likely to be searched than white people<sup>37</sup> and that people of color are significantly overrepresented in the U.S. prison population, making up more than 60 percent of the people behind bars.<sup>38</sup>

After release, formerly incarcerated individuals fare poorly in the labor market, with most experiencing difficulty finding a job after release. Research shows that roughly half of people formerly incarcerated are still unemployed one year after release.<sup>39</sup> For those who do find work, it's common to have annual earnings of less than \$500.<sup>40</sup> Further, during the time spent in prison, many lose work skills and are given little opportunity to gain useful work experience.<sup>41</sup> People who have been involved in the justice system struggle to obtain a driver's license, own a reliable means of transportation, acquire relatively stable housing, and maintain proper identification documents. These obstacles often prevent them from successfully re-entering the job market and are compounded by criminal background checks, which

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<sup>34</sup> Elizabeth Kneebone and Natalie Holmes, "The Growing Distance Between People and Jobs in Metropolitan America," Brookings Institution, March 2015, <https://www.brookings.edu/research/the-growing-distance-between-people-and-jobs-in-metropolitan-america/>.

<sup>35</sup> Ibid.

<sup>36</sup> Jamal Hagler, "8 Facts You Should Know About the Criminal Justice System and People of Color." Center for American Progress, May 2015, <https://www.americanprogress.org/issues/race/news/2015/05/28/113436/8-facts-you-should-know-about-the-criminal-justice-system-and-people-of-color/>.

<sup>37</sup> Lynn Langton, Matthew Durose, et al., *Police Behavior during Traffic and Street Stops, 2011*, U.S. Department of Justice, October 2016, <https://www.bjs.gov/content/pub/pdf/pbtss11.pdf>.

<sup>38</sup> "United States profile," Prison Policy Initiative, <https://www.prisonpolicy.org/profiles/US.html#disparities>.

<sup>39</sup> Adam Looney and Nicholas Turner, *Work and Opportunity Before and After Incarceration*, The Brookings Institution, March 2018, <https://www.brookings.edu/research/work-and-opportunity-before-and-after-incarceration/>; Joan Petersilia, *When Prisoners Come Home: Parole and Prisoner Reentry*, Chicago, Ill: University of Chicago Press, 2003, <https://www.amazon.com/When-Prisoners-Come-Home-Prisoner/dp/0195386124>; Jeremy Travis, *But They All Come Back: Facing the Challenges of Prisoner Reentry*, Washington, D.C.: Urban Institute Press, 2005, <https://www.amazon.com/But-They-All-Come-Back/dp/0877667500>.

<sup>40</sup> Ibid., 41.

<sup>41</sup> Christy Visher, Sara Debus, and Jennifer Yahner, *Employment after Prison: A Longitudinal Study of Releasees in Three States*, The Urban Institute, October 2008, <https://www.urban.org/sites/default/files/publication/32106/411778-Employment-after-Prison-A-Longitudinal-Study-of-Releasees-in-Three-States.PDF>.

further limit access to employment.<sup>42</sup> A recent survey found that 96 percent of employers conduct background checks on job applicants that include a criminal history search.<sup>43</sup>

## **NPRM DOES NOT IMPROVE EMPLOYMENT OUTCOMES AND WOULD ACTUALLY UNDERMINE INVESTMENTS IN PROGRAMS THAT DO IMPROVE SUCH OUTCOMES**

### ***Time Limits and Work Reporting Requirements Do Not Support Employment***

Unlike work reporting requirements in most public assistance programs, SNAP time limit rules do not require states to offer options for meeting work reporting requirements before cutting people off benefits. Historically, many states have chosen not to help people subject to the time limit find qualifying work or training activities.<sup>44</sup> Many immigrants and people of color will lose SNAP if they cannot find a qualifying activity—which does not include job search—on their own.

Some state and local leaders have worked hard over the past decade to intentionally engage SNAP participants in high-quality programs and develop partnerships for SNAP Employment and Training (E&T). However, these efforts, still in early stages, require substantial resources and capacity to deliver outcomes. This investment in quality, high-intensity programs will likely shift as some states seek to spread limited SNAP E&T resources thinly to help more people meet SNAP time limit rules. The resulting low-intensity SNAP E&T programs have proven to be ineffective in moving SNAP recipients into jobs that will allow them to achieve economic security. Moreover, there are opportunity costs: the time that a SNAP recipient loses in low-intensity programs or low-wage jobs for the purpose of meeting work reporting requirements could have been spent obtaining additional credits and certificates, and ultimately increasing their earnings.

If SNAP recipients do manage to find low-wage jobs to meet work reporting requirements, they do not fare any better in the long run than those in low-intensity SNAP E&T programs. Lessons learned from TANF, SNAP, and other safety net programs demonstrate that work reporting requirements are not effective in connecting people to living-wage jobs.<sup>45</sup> As laid out by the Center on Budget and Policy Priorities in a review of rigorous evaluations, research shows that employment increases among individuals subject to work reporting requirements were modest and faded over time. In nearly all of the approximately dozen programs evaluated, employment among recipients *not* subject to work reporting requirements was the same as or higher than employment among individuals subject to work reporting requirements within five years.<sup>46</sup>

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<sup>42</sup> Marina Duane, Nancy La Vigne, Mathew Lynch, et al., *Criminal Background Checks: Impact on Employment and Recidivism*, The Urban Institute, March 2017, [https://www.urban.org/sites/default/files/publication/88621/2017.02.28\\_criminal\\_background\\_checks\\_report\\_finalized\\_blue\\_dots\\_1.pdf](https://www.urban.org/sites/default/files/publication/88621/2017.02.28_criminal_background_checks_report_finalized_blue_dots_1.pdf).

<sup>43</sup> Thomas Ahearn, “Survey Finds 96 Percent of Employers Conduct Background Screening,” Employment Screening Resources, August 2017, <http://www.esrcheck.com/wordpress/2017/08/03/survey-finds-96-percent-of-employers-conduct-background-screening/>.

<sup>44</sup> 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](https://www.clasp.org/sites/default/files/publications/2018/01/2018_snapandwork.pdf).

<sup>45</sup> Ladonna Pavetti, *Work Requirements Don't Cut Poverty, Evidence Shows*, Center on Budget and Policy Priorities, June 2016, <https://www.cbpp.org/research/poverty-and-inequality/work-requirements-dont-cut-poverty-evidence-shows>.

<sup>46</sup> Ibid.



Work reporting requirements are not only ineffectual but have opportunity costs: the time that a SNAP recipient loses in low-intensity programs or low-wage jobs simply to meet requirements could have been spent obtaining skills and credentials, finding a quality job, and increasing their earnings. A much better focus for public policy is to invest in strategies that support people to develop skills and access training that prepares them for jobs that pay living wages and foster an economy that creates more quality jobs with fair wages.

### ***Proposal Would Weaken the Economy as a Whole***

SNAP has historically served as an economic stabilizer in changing times. It helps to shorten recessions and dampen the effects of an economic cycle in downturn. Without the mitigating effects of SNAP, the impact of recessions can escalate. The proposed rule inhibits SNAP from rapidly responding to changing economic conditions, and the resulting impact on the economy will affect all job seekers. In addition, by the USDA's own calculations, the proposed rule would take food away from 755,000 low-income Americans, resulting in a loss of at least \$15 billion in SNAP benefits over 10 years. These cuts will also have negative economic ripple effects, as SNAP benefits also have been shown to have positive multiplier effects on state and local economies and to create new agricultural jobs.<sup>47</sup>

Based on USDA Economic Research Service analysis, it is estimated that each \$1 in federal SNAP benefits generates \$1.79 in economic activity. In 2018, SNAP benefits redeemed in Seattle resulted in an estimated \$159,000,000 in economic activity.<sup>48</sup> Those dollars help many food retailers operating on thin margins to remain in business; something that improves food access for all residents. In Seattle, local farmers markets and ethnic grocery stores also participate in Fresh Bucks – an incentive program that provides bonuses for SNAP shoppers purchasing fruits and vegetables, further leveraging these positive multiplier effects.

Additionally, these U.S. government programs, such as TANF, SNAP, and others, were instituted to be *temporary* supports for U.S. residents. Many advocates refer to these programs as “springboard” programs, indicating that residents are meant to use them in the event of a catastrophic or emergency situation, which can then help bounce them back to self-sufficiency. These programs were also intended to help prevent individuals from falling into permanent poverty and chronic homelessness, a situation

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<sup>47</sup> Mark M. Zandi, *Assessing the Macro Economic Impact of Fiscal Stimulus 2008*, January 2008, <https://www.economy.com/markzandi/documents/Stimulus-Impact-2008.pdf>; Kenneth Hanson, *The Food Assistance National Input-Output Multiplier (FANIOM) Model and Stimulus Effects of SNAP*, U.S. Department of Agriculture, October 2013, [https://www.ers.usda.gov/webdocs/publications/44748/7996\\_err103\\_1\\_.pdf?v=41056](https://www.ers.usda.gov/webdocs/publications/44748/7996_err103_1_.pdf?v=41056); "The Benefits of Increasing the Supplemental Nutrition Assistance Program Participation in Your State," U.S. Department of Agriculture, December 2011, [https://www.fns.usda.gov/sites/default/files/bc\\_facts.pdf](https://www.fns.usda.gov/sites/default/files/bc_facts.pdf); "Chart Book: SNAP Helps Struggling Families Put Food on the Table," Center on Budget and Policy Priorities, March 2017, <https://www.cbpp.org/research/food-assistance/chart-book-snap-helps-struggling-families-put-food-on-the-table#part8>.

<sup>48</sup> Based on the value of SNAP benefits to Seattle residents in 2017. Data from Washington State Department of Health and Social Services Client Data portal. <http://clientdata.rda.dshs.wa.gov/Home/ShowReport?reportMode=0>

that is not only harmful to the family, but also far costlier to governments, as evidenced by a multitude of studies.<sup>49 50 51</sup>

U.S. Census Bureau data supports the temporary nature of these benefits for residents. According to a May 2015 study, of the one-in-five Americans who participated in a program like Medicaid or SNAP from 2009 through 2012, the Census Bureau reported that 56 percent stopped participating within 36 months, while 43 percent lingered on the programs between three and four years. Nearly one-third quit receiving benefits within one year.<sup>52</sup>

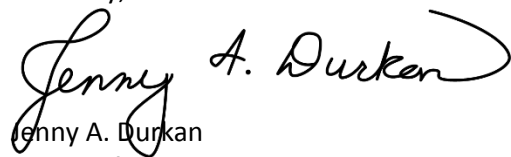
Ultimately, immigrants who come off of public benefits end up paying taxes, spending money, and contributing to the U.S. economy. In fact, according to 2016 American Community Survey (ACS) data, immigrants paid an estimated \$223.6 billion in federal taxes in 2014. This includes \$123.7 billion in Social Security tax and \$32.9 billion in Medicare tax. On the state and local level, immigrants paid \$104.6 billion in taxes. The combined contribution of immigrants in 2014 was \$328.2 billion in taxes.

## **CONCLUSION**

We strongly oppose the proposed rule that would expose even more people to the arbitrary food cutoff policy by limiting state flexibility regarding area waivers and individual exemptions. By the administration's own calculations, the proposed rule would take food away from 755,000 low-income Americans, cutting food benefits by \$15 billion over ten years. The administration does not estimate any improvements in health or employment among the affected population.

Adding additional barriers to accessing nutritious food and three meals a day will make it even more difficult for individuals already facing economic inequity and discrimination to find and maintain employment. By failing to consider existing disparities and discrimination, the proposed policy will only exacerbate racial and ethnic injustice in our county. USDA should withdraw the proposed rule in its entirety. We encourage the department to instead dedicate its efforts to advancing policies that truly support economic security by promoting the ability of immigrants and people of color to thrive.

Sincerely,



Jenny A. Durkan  
Mayor of Seattle

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<sup>49</sup> Wogan, J.B., "Study: Housing the Homeless Can Drastically Cut the Government's Health Care Costs," December 6, 2017, Governing. Available at <http://www.governing.com/topics/health-human-services/gov-housing-homeless-health-costs-rand-study.html>

<sup>50</sup> Pomeroy, Stephen, "The Cost of Homelessness: Analysis of Alternate Responses in Four Canadian Cities," March 2005. Prepared for the National Secretariat on Homelessness. Available at <https://www.homelesshub.ca//resource/cost-homelessness-analysis-alternate-responses-four-canadian-cities>

<sup>51</sup> Culhane, Dennis P., "Public Service Reductions Associated with Placement of Homeless Persons with Severe Mental Illness in Supportive Housing," January 1, 2002, Housing Policy Debates. Available at [https://works.bepress.com/dennis\\_culhane/4/](https://works.bepress.com/dennis_culhane/4/)

<sup>52</sup> See <https://www.census.gov/newsroom/press-releases/2015/cb15-97.html>