

In Defense of a Dignified SNAP: The 2018 Farm Bill

By Athena Roesler



The Supplemental Nutrition Assistance Program (SNAP), formerly called food stamps, is the largest program within the domestic hunger safety net aimed at providing necessary resources, improving dietary intake, and alleviating poverty for vulnerable Americans. SNAP is authorized and appropriated by Congress within Title IV of the Farm Bill, accounting for nearly 80 percent of the Farm Bill's budget. The vote on HR 2, the Agriculture Improvement Act, failed in the House of Representatives on May 18, 2018. A second version supported only by Republican members passed in a tight vote on June 21.¹ The Senate passed their version a week later.

Pressing threats to SNAP in the latest legislation include expanding work requirements, measures to improve “integrity” by making proof of eligibility increasingly burdensome, restricting EBT card replacement allowances, and creating an unwieldy national database in order to prevent duplicative enrollment. These changes are notable in that they both ignore participants’ dignity and add bureaucratic complexity that would discourage people in need from accessing SNAP. This policy brief will explain the proposed changes and consider them in the context of human dignity and poverty alleviation.

Background

In 2017, 42.2 million Americans received SNAP with an average monthly benefit of \$125.80, totaling \$68.1 billion.² SNAP benefits may only be used on grocery food items at authorized retailers and exclude alcohol, prepared

hot foods (with some exceptions), vitamins, and non-food items. Though SNAP participation still carries tremendous social stigma, it is unique among other entitlement programs in that both adults and children can access benefits, and individuals have complete autonomy in choosing food most aligned with their cultural and personal preferences. Nearly two-thirds of SNAP participants are children, elderly, or people with disabilities.³ SNAP is restricted to low-income Americans who meet eligibility requirements. Household gross monthly income must be at or below 130 percent of the federal poverty level, with specific asset rules.

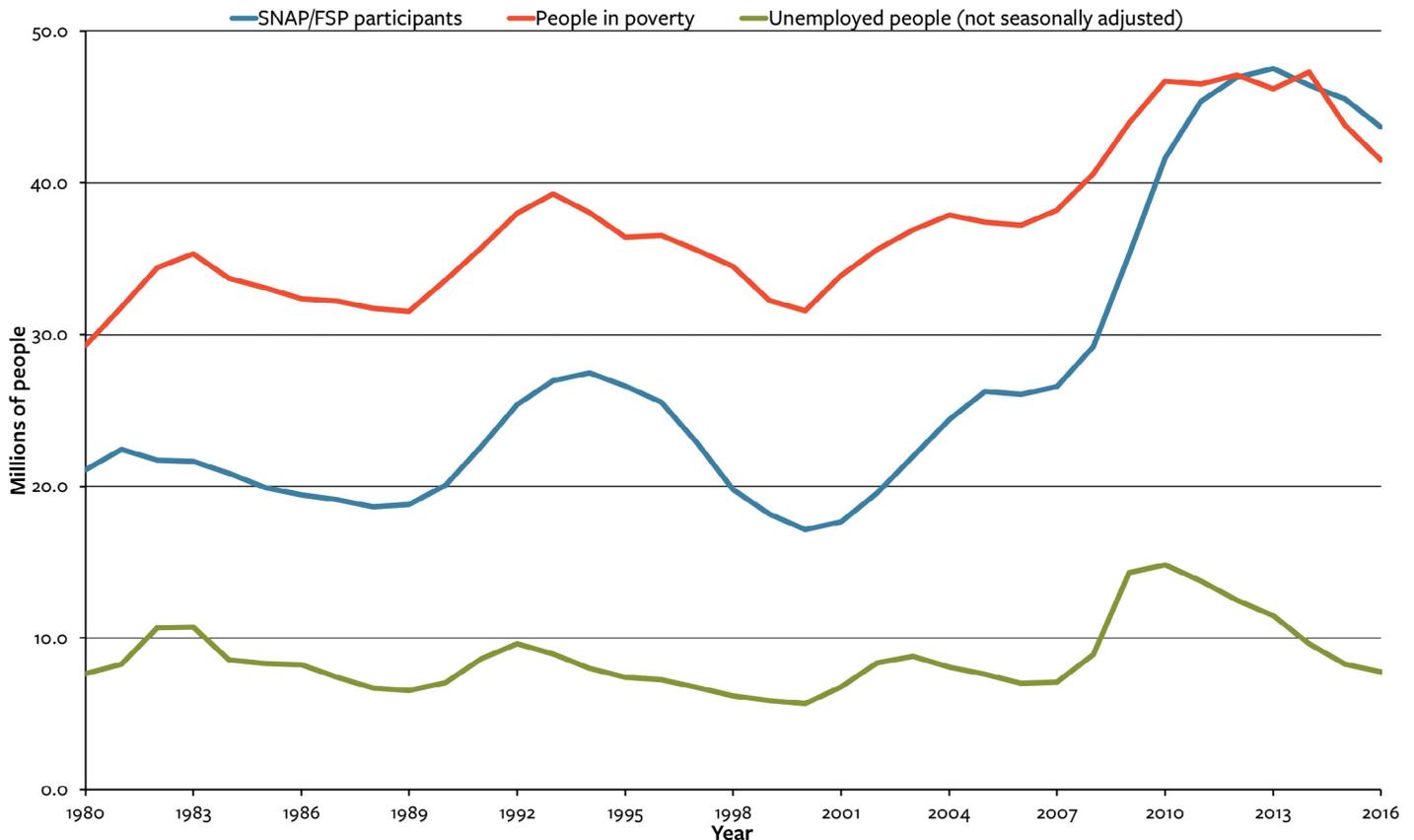
“Categorical eligibility,” which allows considerable flexibility at the state level, is a mechanism to automatically allow SNAP eligibility through participation



Mary “the Peach Lady” Manley (left) with Janice Potts, using the Senior Farmer’s Market Nutrition Program Check in Owingsville, KY. Photo: Lance Cheung. USDA Photo Library.

SNAP/FSP participants, people in poverty, and unemployed people, 1980-2016

Poverty, participation levels, and unemployment have all declined in recent years.

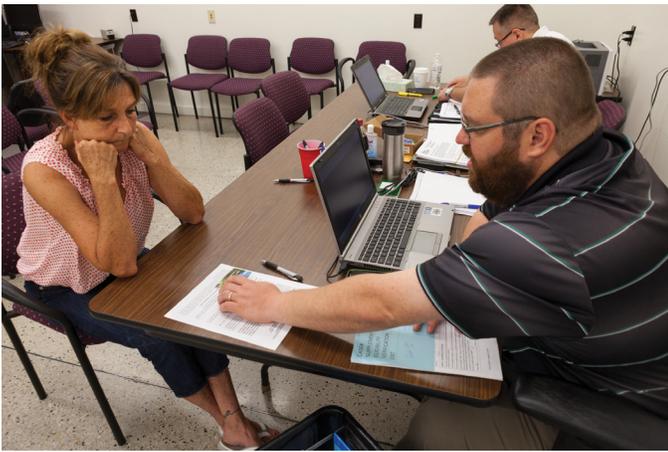


Source: United States Department of Agriculture Economic Research Service

in other means-tested programs, like Supplemental Security Income, Temporary Assistance for Needy Families (TANF), or General Assistance. The expanded ability for states to use categorical eligibility decreased inefficient beneficiary and administrative burdens and led to higher SNAP participation for those in need.⁴ Currently, able-bodied adults without dependents between the ages of 18 and 49 are required to work half-time or be in job training programs, but they can be unemployed for as many as three months out of every three years. States may apply for federal waivers to waive these requirements for areas with high unemployment or for a set number of individuals. Before the financial crisis of 2008, the average length of individual SNAP participation was only eight months, clearly indicating it was a safety net program not a chronic solution to food insecurity; even in the midst of the 2008 financial crisis, when need was much higher, average participation only increased to 12 months, with participation falling again once the recession ended.⁵

Long-Term Health and Economic Impacts of SNAP

The main purpose of SNAP is to provide nutrition and decrease food insecurity for vulnerable Americans. Research suggests that SNAP is effective at these primary goals, with additional health benefits to individuals with children or chronic diseases. For children, SNAP is associated with benefits to long-term health, educational attainment, rate of incarceration, and economic self-sufficiency.⁶ SNAP acts counter-cyclically as both poverty alleviation and market stimulus during economic hardship. From 2008–10, a one-percentage-point increase in the unemployment rate was associated with an additional two to three million additional participants.⁷ SNAP brings collective economic benefits, with every dollar spent on SNAP generating about \$1.70 in economic activity.⁸ The research is clear that the relatively short time individuals receive SNAP does not fully reflect the program's benefits to both society and individuals.



Economic Service Worker Mike Tetreault activates EBT for Sherry Falls in Lewisburg, WV. Photo: Steve Ausmus. USDA Photo Library.

Defending a Dignified SNAP in the 2018 Farm Bill

As a program that affects millions of Americans at a large cost, the statistics, trends, and complicated technicalities of SNAP often overshadow the lived, human experience. As Michael Conaway, the Chairman of the House Committee on Agriculture, explained in a SNAP hearing, “We can all agree that no one ought to go hungry in America, and SNAP is essential in protecting the most vulnerable citizens during tough times.”⁹ Protecting the United States’ most vulnerable citizens’ right to food and health must simultaneously preserve and uplift their dignity. Building up dignity through resiliency is not a privilege, but a necessity for a civil society. Achieving this requires trusting and empowering individuals to make their own decisions. Below are a few of the proposed changes in HR 2 that deserve scrutiny for their negative impact on the dignity of current and prospective SNAP recipients.

Changes to Work Requirements

HR 2 expands work requirements for able-bodied adults without dependents (ABAWD) under 60 years of age (instead of 50) in the name of helping people pull themselves out of poverty. This includes individuals who have children over six years of age. Current rules limit SNAP benefits for ABAWDs to only three months every three years if they don’t work at least 20 hours per week or participate in a government-run employment

and training program (with some exemptions). New provisions would limit that time to one month and impose punitive restrictions for any failure to meet those requirements.^a

The one-month limit also requires the monthly tracking of work hours, creating an unnecessary administrative burden for participants and program managers. This arbitrary time limit also leaves an unrealistically small amount of room for life’s unexpected work interruptions like a transportation failure, the common cold or flu, or paperwork delays. Instead of providing additional support to those in most need, individuals are penalized and stripped of benefits necessary to remain well-nourished.

“Politicians like the phrase ‘welfare to work.’ Maybe they think it’s easy to find a job because they’ve never had to pound the pavement with a dozen resumes, spending days filling out applications, waiting for call backs, then interviews, only to find they start at just four hours a week—at \$7.50 an hour. Do all of that while you’re hungry, sleep-deprived, and experiencing stress of a level that has you in ‘survival mode.’ Do that while you have children clinging to you during a phone interview. Then go out and try to find a daycare with openings that will take your government voucher—while stressing over feeding your children and yourself and caring for the housing you’re scared you might lose.”

—Stephanie Land, author of *MAID: Hard Work, Low Pay, and a Mother’s Will to Survive*.¹⁶

SNAP is a nutrition program meant to provide healthful stability, not a work program. This is especially true when the vast majority of SNAP participants are working, or actively seeking work, but underemployed at low wage jobs. The share of SNAP households with earned income rose by roughly 50 percent over the past 20 years.¹⁰ Of SNAP households with at least one working-age, non-disabled adult, more than 80 percent work in

^a Punishment would bar the individual (not the family) from SNAP participation for one year. A second violation would bar individuals from benefits for three years.

the year before or after receiving SNAP benefits.¹¹ This evidence suggests that SNAP helps working families who temporarily fall on hard times or those who have employment but whose earnings are insufficient. Workers in low-wage jobs often can't rely on steady, full-time employment, yet the proposed requirements won't help create or support such reliable jobs.

The Congressional Budget Office (CBO) expects the number of individuals subject to these new work requirements to increase by 3.5 million individuals, which in turn could remove 1.1 million individuals from the program, representing \$9.2 billion in benefits over ten years.¹² While this could potentially save the government \$1.5 billion over a decade, the truth is that it disregards individuals who have demonstrated a need for assistance, yet are either unable to meet the administrative burden or else face barriers to employment that remain systematically unaddressed. Food insecurity is a symptom of poverty or lack of adequate income, and adding stricter work requirements while failing to address hurdles to employment (such as a lack of child care, transportation, formal education, a criminal record, or health conditions) is both harmful to participants and a waste of government money. This proposed change disregards the two decades of evidence from similar TANF work requirements passed in 1996. TANF participants reported they lost benefits for reasons unrelated to their desire to work, including not understanding program rules, administrative glitches, and the state's lack of capacity to identify justified exemptions related to poor health, lack of transportation, or low education.¹³ Lessons learned from TANF also show that the most vulnerable participants, who had less capacity to navigate complex administrative processes, were the most likely to lose benefits.

Even though SNAP is a nutrition program and is not intended to be a job training program, there are existing employment and training (E&T) programs within SNAP and other entitlement programs that have not been evaluated for their potential to help people find meaningful and reliable work. The "Workforce Investment Act (WIA) Gold Standard Evaluation" explained that programs that were effective cost



Rep. Lisa Blunt Rochester of Delaware questions USDA Secretary Sonny Perdue about SNAP during May 2017 hearings. Photo: Preston Keres, USDA Photo Library.

upwards of \$10,000 per person per year.¹⁴ With conservative estimates that new requirements would require three million additional E&T slots, the \$7.65 billion allotted in HR 2 is grossly inadequate compared to the \$15 billion needed each year.¹⁵ Another lesson learned from this evaluation showed that more than a quarter of both work registrants and E&T participants reported three or more barriers to obtaining and retaining employment. The most commonly reported barriers were health issues, transportation challenges, lack of education, and caring for a family member with health problems. None of these barriers are addressed in HR 2. Furthermore, the evaluation of pilot E&T programs in ten states that were authorized in the last Farm Bill is yet to be completed. It is rash to implement a nationwide program before fully understanding the efficacy, best practices, or financial implications of its pilot programs. Instead of intensifying work requirements and mandating a training program, lawmakers should strengthen existing programs for those who have demonstrated interest in them. They could achieve this by addressing the barriers often cited by participants through childcare assistance, ensuring living wages, building out public transportation infrastructure, passing "Ban the Box" employment rules, and increasing access to affordable healthcare.^b

^b For example, the San Francisco Board of Supervisors passed the Fair Chance Ordinance in 2014, and the State of California passed a similar law in 2017 (AB 1008). These laws prohibit employers from asking certain questions about applicant's criminal conviction history.



Tom Vilsack, USDA Secretary (2009-2017, seated right), during sessions on SNAP, US Conference of Mayors, 2013. Photo: Lance Cheung. USDA Photo Library.

Abuse and Fraud Prevention

HR 2 also proposes a host of changes related to “improving integrity,” perpetuating the inaccurate rhetoric that SNAP has high levels of abuse. In reality, these measures would effectively remove SNAP benefits from more individuals in need while creating extensive administrative burdens and privacy violations. The bill proposes to expand the duplicative enrollment database, limit replacement of EBT cards to two a year instead of the current maximum of five, and eliminate the standard utility deduction. While SNAP funds should be used as intended—and administrators work to ensure that—these proposed changes echo a rhetoric of pervasive fraud and lack of integrity among SNAP participants that does not align with the current fraud rate of 1.4 percent.¹⁷ Though SNAP fraud rates remain comparatively minuscule, the rhetoric of abuse is used as a tool to justify inflexible administrative burdens that limit participation while attacking participants’ integrity.

The Duplicative Enrollment Database would prevent SNAP participants from receiving duplicate benefits in multiple states. The proposed database would include extremely sensitive information like Social Security numbers, income, and asset information that is shared monthly with the USDA. Having such a large national database raises concerns about data security, privacy, and other uses of this information. A similar program piloted in five southern states showed that less than 0.2

percent of SNAP participants were dual participants, meaning an unwieldy, costly database would have little fraud-prevention impact. In another move that would increase administrative complexity, new provisions seek to eliminate a household’s receipt from the Low Income Home Energy Assistance Program (LIHEAP) as evidence of utility expenses for the standard utility deduction. Connecting these two programs previously reduced unnecessary paperwork, but new provisions seek to make families produce verification of their utility bills. Those unable to verify their bills or navigate the new complexities would have reduced benefits, with the CBO estimating a \$5.2 billion reduction over 10 years.¹⁸

Conclusion

Members of Congress frame SNAP as a crucial way to help break the cycle of poverty and offer a hand up; however, the proposed restrictions and deluge of paperwork in HR 2 does quite the opposite. Section 4015 of the bill (“Workforce solutions”) and other provisions described here may be nominally intended to increase integrity, yet will kick millions of people off SNAP when they are truly in need, increase their bureaucratic burden, and effectively strip them of their dignity. It is unfortunate that advocates must work to defend the status quo instead of building on the program in ways that bolster dignity through improved nourishment. For example, recent studies have shown benefits often do not sustain families through the end of the month, leading to cycles of abundance and scarcity. These cycles have been linked to higher hospitalization rates and poorer performance in school.¹⁹ This corroborates research that shows the Thrifty Food Plan used to calculate benefits is based on outdated assumptions, especially in terms of variety, palatability, time spent preparing meals, and geographic pricing.²⁰ The Agriculture Improvement Act of 2018 does include a provision to re-evaluate the Thrifty Food Plan based on average food prices and consumption patterns. Such an evaluation will demonstrate the need for increasing currently insufficient benefit packages. This process should be of high priority and include input from a sample of nationally representative SNAP recipients so that the food plan better reflects lived experiences.

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