April 30, 2018

The Honorable Paul Ryan  
The Honorable Nancy Pelosi  
Speaker  
Minority Leader  
U.S. House of Representatives  
U.S. House of Representatives  
Washington, DC 20515  
Washington, DC 20515

Dear Speaker Ryan and Minority Leader Pelosi:

On behalf of the 115,700 members of the American Psychological Association (APA), we are writing regarding the Agriculture and Nutrition Act of 2018, also known as the Farm Bill (H.R. 2). More specifically, APA is concerned about several provisions in Title IV, Subtitle A, which reauthorizes the Supplemental Nutrition Assistance Program (SNAP).

APA is the largest scientific and professional organization representing psychology in the United States. Our membership includes researchers, educators, clinicians, consultants, and students. APA works to advance the creation, communication, and application of psychological knowledge to benefit society and improve people's lives. We are providing input into this bill as psychological research and practice document the harmful effects of poverty on mental health. For example, data from the National Institute of Mental Health indicate that low-income individuals are 2 to 5 times more likely to suffer from a diagnosable mental disorder than those of the highest SES group\(^1\), and poverty poses a significant obstacle to accessing treatment for these mental health problems\(^2\). Furthermore, our governing Council has adopted a Resolution on Poverty and Socioeconomic Status, which states that APA “will support public policy and programs that ensure...access to sufficient food and nutrition...for poor people and all working families.”\(^3\) Accordingly, we are concerned that specific portions of the Farm Bill would make it harder for unemployed people to receive food assistance, which would push them further into poverty.

SNAP is the largest program in the domestic hunger safety net, helping about 42 million Americans a month in 2017\(^4\). Although the average benefit is just $1.40 per person per meal, the program lifts millions of people out of poverty\(^5\), with both short-term and long-term benefits. For example, SNAP is linked with improved health\(^6\), decreased psychological distress\(^7\), and reduced health care expenditures\(^8\). Moreover, early access to SNAP is associated with long-term improvements in health\(^9\).

APA supports several key components of the SNAP portion of the Farm Bill. For example, mandating transitional benefits would ensure that families who leave the Temporary Assistance for Needy Families program would still automatically receive up to five months of transitional benefits.

Sincerely,

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\(^1\) Data from the National Institute of Mental Health.  
\(^2\) APA Research  
\(^3\) APA Resolution on Poverty and Socioeconomic Status  
\(^4\) SNAP data from the United States Department of Agriculture  
\(^5\) SNAP data from the United States Department of Agriculture  
\(^6\) SNAP data from the United States Department of Agriculture  
\(^7\) SNAP data from the United States Department of Agriculture  
\(^8\) SNAP data from the United States Department of Agriculture  
\(^9\) SNAP data from the United States Department of Agriculture
SNAP benefits. Increasing the earned income deduction to 22% would increase benefits of some households. And mandating the homeless housing allowance would make it easier for homeless families to apply for SNAP benefits.

However, these benefits are outweighed by what would amount to harmful cuts to the program, leading to many SNAP recipients losing benefits. For example, the bill would impose new mandatory work requirements on millions of SNAP participants, requiring all those between the ages of 18 and 59, who do not have a disability or a child under the age of six, to prove that they are working (or participating in a work program) for at least 20 hours a week. Those who cannot comply with these requirements would suffer strict sanctions. The initial penalty for failing to comply would result in a loss of benefits for 12 months; subsequent failures would lead to benefits being lost for 36 months. These penalties would severely impact those who, in order to qualify for an exemption, must prove a physical disability or mental illness, sometimes on a monthly basis. Though the SNAP program includes an exemption for people with documented health conditions, too often state agencies fail to help individuals prove they are exempt.

APA opposes these cuts to SNAP based on research showing that increasing work requirements and penalties will likely be unsuccessful in leading people out of poverty, and that people pushed deeper into poverty due to the loss of benefits will suffer harm to their physical and mental health. It is also informative to take into account what psychological science tells us about the cognitive effects of scarcity. All individuals have limited “mental bandwidth,” and when people lack financial resources (or food, time, or any other commodity), this scarcity depletes this bandwidth, limiting the ability to pay attention to anything but the most pressing tasks. Unemployed and low-income people are likely to suffer from these effects, which can impact cognitive functioning and decision-making, making job-seeking even more challenging. An effective expansion of the SNAP Education and Training Programs or equivalent state programs would encompass services such as free child care or help with transportation to ease the effects of scarcity. However, funding levels in the bill imply an expansion of the more common “low-touch” services - such as access to a computer to aid job-searches, which are far less helpful.

While we support the plan’s dramatic expansion of work training programs to ensure that all eligible people can enroll, the bill does not provide sufficient funding to make this a realistic option. Providing effective training programs to the potentially millions of people who would need them would be an unprecedented undertaking at a cost that could not be met by the authorized appropriation level in the current bill.

We recommend that Congress await the results of the 2014 Farm Bill Employment & Training pilot projects before making the kind of drastic changes that have been proposed. The 2014 Farm Bill authorized $200 million for ten state pilots seeking to increase employment among SNAP participants, requiring rigorous evaluations. All ten of the USDA-awarded state pilot grants in 2015 are currently operational, and evaluation activities will occur through 2021. Congress should await final evaluation reports before increasing work requirements and noncompliance penalties.
Thank you in advance for your consideration of our concerns. If we can provide any further information, please contact Gabriel Twose, PhD, (gtwose@apa.org) in our Public Interest Government Relations Office.

Sincerely,

Arthur C. Evans, Jr., Ph.D.
Chief Executive Officer

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