March 13, 2019

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

Re: Supplemental Nutrition Assistance Program: Requirements for Able-Bodied Adults Without Dependents, RIN: 0584-AE57

The American Psychological Association (APA) appreciates this opportunity to respond to a request for information published in the Federal Register on February 1, 2019 (Docket No. FNS-2018-0004): Supplemental Nutrition Assistance Program: Requirements for Able-Bodied Adults Without Dependents (ABAWD), which would amend the regulatory standards by which the Department evaluates State SNAP agency requests to waive the time limit and to end the unlimited carryover of ABAWD percentage exemptions. The proposed rule would eliminate SNAP benefits for vulnerable people, creating a cascading effect of harm – including increased occurrences of mental health disorder, and an increased number of working poor with insufficient jobs to support themselves and their families. We oppose the proposed rule and we urge the Department to maintain current regulatory standards.

APA is the largest scientific and professional organization representing psychology in the United States. Our membership includes more than 118,400 researchers, educators, clinicians, consultants, and students. APA works to promote the advancement, communication, and application of psychological science and knowledge to benefit society and improve lives.

Poverty harms health and is alleviated by SNAP
Research shows that poverty is associated with harm to physical and 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 experience a diagnosable mental health disorder than those of the highest SES group, and poverty poses a significant obstacle to accessing treatment for these mental health problems. Accordingly, our APA 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.”

SNAP is the largest program in the domestic hunger safety net, currently helping about 39 million Americans a month. Although the average benefit is just $1.40 per person per meal, the program lifts millions of people out of poverty, with both short-term and long-term health benefits. In this regard, there is compelling research documenting the relationship between access to SNAP and reduced food insecurity, improved health, decreased psychological distress, and reduced health care expenditures. Moreover, childhood access to SNAP is
associated with long-term improvements in health.\textsuperscript{12}

The proposed rule would cut SNAP benefits and would not help people find work
According to the Department’s own estimate, the proposed rule would eliminate SNAP benefits for 755,000 people and cut $15 billion in SNAP benefits over 10 years. Federal law already requires that states limit SNAP eligibility to three months out of every three years for unemployed and underemployed adults without dependent children unless they can document 20 hours of work a week. States may ameliorate the effects of this strict policy by requesting waivers of the time limit for areas within the state that have 10\% or higher unemployment rates or, based on other economic indicators, have “insufficient jobs.” Moreover, states have discretion to exempt individuals from the time limit by utilizing a set pool of exemptions. The proposed rule would make it much harder for states to receive these exemptions by adding a 7\% unemployment rate floor, by dropping almost all state-wide waivers, by severely limiting the economic factors considered in assessing an area’s eligibility for a waiver, and by curtailing the states’ ability to use accumulated waivers. It is notable that these kinds of approaches were rejected by Congress in 2018.

Data show that most SNAP recipients who can work, do work. Among SNAP households with at least one working-age, non-disabled adult, more than half work while receiving SNAP, and more than 80\% work in the year before or after receiving SNAP.\textsuperscript{13} But SNAP recipients seeking jobs will benefit from support more than from harsh incentives, for example help with effective training, transportation, or childcare. Psychological science on the cognitive effects of scarcity is instructive about why this is so. All individuals have limited mental capacity. When one does not have enough money, food, time, or any other important human need, this scarcity limits one’s ability to pay attention to anything but the most pressing tasks.\textsuperscript{14} Financial scarcity is especially damaging, so unemployed and low-income people are likely to suffer from these effects, which can limit cognitive functioning and decision-making\textsuperscript{15} and hence impair job-seeking ability. Contrary to assumptions underlying these proposed changes to SNAP, unemployed beneficiaries seeking jobs need support overcoming barriers to employment.

These kinds of requirements typically hurt specific groups – to give just one example, African Americans are more likely than the general population to experience food insecurity and to utilize SNAP.\textsuperscript{16} The Department itself notes that the proposed changes “have the potential for disparately impacting certain protected groups due to factors affecting rates of employment of these groups.” However, “[it] find[s] that implementation of mitigation strategies and monitoring by the Civil Rights Division of FNS will lessen these impacts.” But without any explanation of these strategies or monitoring, it is not possible to comment on their potential effectiveness.

In closing, APA supports efforts to help low-income Americans find employment, but making people hungrier won’t help them find work faster. Rather, this proposed rule would cause people to lose access to vital nutritional support, pushing them further into poverty. APA opposes this proposed regulation due to its likely harms on low-income people. If we may provide any further information, please contact Gabriel Twose, Ph.D., in our Public Interest Government Relations Office at 202-336-5931 or gtwose@apa.org.


