



April 1, 2019

Submitted via www.regulations.gov

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

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

Dear Certification Policy Branch:

I am writing on behalf of Prevention Institute in response to the USDA's proposed rule, "Supplemental Nutrition Assistance Program (SNAP): Requirements for Able-Bodied Adults without Dependents (ABAWDs)" to express our strong opposition to the agency's attempt to further restrict food assistance. **Taking away access to food assistance programs will not result in increased employment and earnings and will exacerbate existing racial and ethnic inequities.** We urge that the Department withdraw the proposed rule in its entirety.

Founded in 1997, Prevention Institute is a national public health non-profit that works to advance health, safety, and wellbeing for all communities, with a focus on closing health inequities that exist across race and ethnicity, sex, socioeconomic status, and immigration status. **Public health is rooted in recognizing the interdependence of health, safety, and wellbeing within society: we are only as healthy as the least healthy member of our community, and their vulnerability makes us all more vulnerable.** By driving individuals away from essential food assistance, the proposed rule denies this interdependence and would result in even more individuals losing access to nutrition assistance under SNAP, disproportionately impacting immigrants and people of color.

SNAP is our nation's most important anti-hunger program, providing food assistance to youth, working families, people with disabilities, seniors, and many more. SNAP helps approximately 39 million people in nearly 20 million households put food on the table.¹ In 2015, SNAP lifted approximately 2.1 million African American, including 1 million children,² and an estimated 2.5 million Latinos, including 1.2 million children, out of poverty.³ More than ten percent of Asian

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

² "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>.

³ "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>.



American and Pacific Islander (AAPI) families receive SNAP benefits,⁴ while many more are likely eligible but unenrolled due to cultural stigma and insufficient program outreach to AAPI groups.⁵

We strongly oppose the proposed rule due to its disproportionate impact on protected classes including immigrants and communities of color. The Department 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.” But no explanation of the mitigation strategies and monitoring is provided, and we do not believe that mitigation strategies can be significant enough to fully address the disproportionate impact of increased food insecurity and poverty on protected classes. This is a deeply troubling omission given that rates of food insecurity are already higher than the national average for Black and Latino headed households.⁶

As an organization committed to advancing the public’s health, we know the proposed rule would make it even more difficult for individuals already facing economic inequity and discrimination to find and maintain employment. **Everyone deserves a fair and just opportunity to be healthy.** By failing to consider existing disparities and discrimination, the proposed policy will only exacerbate racial and ethnic injustice in our country. **The Department 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.

Thank you for the opportunity to submit comments on the proposed rulemaking.

Sincerely,

A handwritten signature in black ink, appearing to read "Sana Chehimi".

Sana Chehimi
Director of Policy and Advocacy
Prevention Institute
sana@preventioninstitute.org

⁴ “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>

⁵ 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>.

⁶ 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>.