NACHSA National Association of County Human Services Administrators
An Affiliate Organization of NACo ★ National Association of Counties

May 11, 2018

The Honorable Mike Conaway
Chair, House Agriculture Committee

The Honorable Collin Peterson
Ranking Member, House Agriculture Committee

The Honorable Kevin Brady
Chair, House Ways and Means Committee

The Honorable Richard Neal
Ranking Member, House Ways and Means Committee

Dear Chairs and Ranking Members:

Re: Oppose Farm Bill's SNAP Provisions as Drafted

The National Association of County Human Services Administrators (NACHSA) has serious concerns over provisions in the Farm Bill (H.R. 2) affecting recipients of the Supplemental Nutrition Assistance Program (SNAP). The proposed policies would increase food insecurity for millions of low-income households and will also increase the administrative complexity for counties serving them.

As an affiliate of the National Association of Counties (NACo), NACHSA represents directors of county human services programs across the country. In ten of those states, NACHSA members administer (and their county government assists in financing) the SNAP program on behalf of the state. Nearly one-third of all SNAP recipients nationwide reside in these states.

Given that SNAP is essential to reducing food insecurity, NACHSA is concerned that the decreased flexibility counties will have to determine eligibility will not only make it more difficult to gather the new documentation necessary from SNAP-eligible families, but will also serve to reduce caseloads due to the new paperwork requirements placed on counties and households alike.

And, while NACHSA wholeheartedly supports county agencies' work to move families into economic independence, the bill's increased work requirements and the funding of

SNAP Employment & Training Programs (E&T) ignores the fact that most households use SNAP as a temporary bridge during times of financial stress. Requiring counties and states to track work participation for millions of new individuals, and/or provide them E&T services is highly unlikely to be cost-effective.

NACHSA's specific concerns follow.

Eligibility Determinations: Counties work to ensure that households eligible for SNAP benefits receive them. Most of those households have an employed individual, but the earnings are insufficient to meet the household's nutrition needs. SNAP helps to fill that financial gap during those tough economic times. To ensure that households receive SNAP when needed, nine of the ten county-administered states have used categorical eligibility to lessen the families' paperwork burden on an already rigorous determination process and reduce the time spent by the caseworker to gather documents.

By only allowing categorical eligibility to be used if the household is receiving TANF cash assistance or TANF-funded supports, the bill's narrow approach is contrary to the goals of reducing both food insecurity and simplifying county administrative processes. Additionally, de-linking the receipt of Low Income Home Energy Assistance Program (LIHEAP) benefits from the Standard Utility Allowance will mean that thousands of our county clients will have to provide utility receipts to counties for review by our workers to determine whether the deduction may be used.

The above proposed restrictions would diminish greatly counties' flexibility to support families and reduce county taxpayer costs when doing so.

New Work Requirements and E&T Supports: As noted above, SNAP is a short-term support for most households, while individuals are in between jobs or do not earn enough to become economically independent. Given the relatively low benefit, families recognize that they need to find gainful employment to make ends meet. The bill, however, would require all 'work-capable' adults to work or participate in work programs 20 hours a week each and every month or risk losing benefits for an entire year. While the policy may appear reasonable on its' face, the inflexible nature of the provision does not account for events in a family's life, whether it be illness, lack of transportation to a job, or the employer's decision to reduce the work hours, due to changes in their workforce needs, especially in the growing retail or service sectors of our economy. The penalty becomes even more draconian if there is a second lapse in meeting the work requirements, triggering a three year ban on receiving SNAP.

The Congressional Budget Office (CBO) estimates that the loss in benefits alone will reduce food assistance by $9.2 billion over ten years. That figure does not account for the anticipated increased county costs in tracking all affected households each and every month.

To support the increased work requirements, the legislation will appropriate $1 billion annually to states to bolster SNAP Employment and Training (SNAP E&T) programs. Distributed nationwide, the E&T grants fall far short of the anticipated need, given that the CBO estimates three million individuals would need to be served. And, the likely continued 'churning' of families on and off of SNAP, as their employment changes, will make the $30 per person per month federal E&T investment even less effective. Again, NACHSA fully supports increased assistance for E&T programs, however, the work requirements will only serve to diminish a county's ability to truly target E&T funds to those households that will have the most to gain from such supports.

As the bill reaches the House floor, NACHSA thanks you for considering our views. Counties are part of the intergovernmental partnership to support families when they confront challenging financial circumstances. The bill, as currently drafted, does not help those efforts.

Sincerely,

Cathy Senderling-McDonald
President, NACHSA
Deputy Executive Director, County Welfare Directors Association of California