



UNITED TO GROW FAMILY AGRICULTURE

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

Re: Proposed Rule: Supplemental Nutrition Assistance Program: Requirement for Able-Bodied Adults without Dependents RIN 0584-AE57

Dear Acting Deputy Under Secretary Brandon Lipps:

On behalf of National Farmers Union's nearly 200,000 family farmer, rancher and rural members, we write in opposition to the Administration's proposed rule on requirements for Able-Bodied Adults without Dependents (ABAWDs) in the Supplemental Nutrition Assistance Program (SNAP). The proposed rule risks worsening hunger in our country and ignores the intent of Congress in the 2018 Farm Bill regarding work requirements for SNAP.

NFU's grassroots, member-driven policy strongly supports federal nutrition programs, including SNAP, and opposes increased work requirements for SNAP program eligibility. SNAP already includes time limits that restrict access to food assistance to three months out of every three years for ABAWDs unless they can document working at least 80 hours per month, or unless they meet qualifying education and training or workfare requirements. In recognition of the strictness of the current work requirements, states can waive requirements in areas where jobs are unavailable or do not match workers' skills. The proposed rule would make it more difficult for states to issue waivers, which risks denying nutrition assistance to people who need it and increasing hunger in our country.

By USDA's own estimates, approximately 755,000 people would lose SNAP benefits if the proposed rule is adopted. We are concerned that the rule would sanction individuals facing various barriers to full participation in the workforce. Nutrition assistance should not be denied to people in need without providing a robust pathway to self-sufficiency.

Additionally, the 2018 Farm Bill, which passed in both chambers of Congress by overwhelming margins, rejected a change to SNAP similar to the proposed rule. Thus, the Administration's proposal stands in clear contradiction to the will of Congress for SNAP.

NFU is supportive of USDA providing a path to long-term, stable employment for SNAP recipients, but this must be done without withholding nutrition assistance from individuals who need it. The proposed rule risks denying food assistance to those who are working, trying to work, or face

barriers to working. And the proposed rule stands in contradiction to the intent of Congress in the 2018 Farm Bill.

We respectfully request USDA withdraw its proposed rule.

Sincerely,

A handwritten signature in black ink, appearing to read "Roger Johnson". The signature is written in a cursive, flowing style.

Roger Johnson
President

CC: USDA Secretary of Agriculture, Sonny Perdue