



The Honorable Frank D. Lucas, Chairman
Committee on Agriculture
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Debbie Stabenow,
Chairwoman
Senate Agriculture Committee
U.S. Senate
Washington, D.C. 20515

The Honorable Collin Peterson, Ranking
Member
Committee on Agriculture
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Thad Cochran, Ranking
Member
Senate Agriculture Committee
U.S. Senate
Washington, D.C. 20515

October 23, 2013

Dear Chairman Lucas, Stabenow, Senator Cochran and Representatives Peterson,

On behalf of CLASP, the Center for Law and Social Policy, I urge you, as a member of the conference committee on the Farm Bill, to oppose any changes that would restrict eligibility for SNAP, or make it harder for needy individuals and families to access food. CLASP seeks to improve the lives of low-income people by developing and advocating for federal, state and local policies to strengthen families and create pathways to education and work.

SNAP has been proven as one of our nation's most effective anti-poverty programs, providing nutritional supports to low-income individuals and families, including those workers whose earnings do not lift them out of poverty. The U.S. Census estimates that if SNAP were counted as income, 4 million fewer people would have been counted as poor in 2012. SNAP has been one of the most responsive programs during the recent recession – reaching more children of unemployed parents than even unemployment insurance -- and has limited the rise of food insecurity and hunger during the recession. **Moreover, research shows that access to SNAP improves children's health, with long-lasting benefits to their development and ability to succeed in school and eventually the workforce.** It is critical that this safety net remain available to children, senior citizens, individuals with disabilities, and unemployed and low-wage workers, today and in future recessions.

We have particular concerns about several provisions of the House-passed SNAP bill:

- Section 139 of the House bill would incentivize states to deny SNAP benefits to needy individuals and families. The provision would allow the states to keep half

the savings resulting from decreased SNAP payments, even though the federal government pays the full cost of SNAP benefits. States that already provide employment and training programs for recipients would lose this funding unless they agreed to adopt these new requirements. Both training and child care programs already do not have enough funding to serve all those who are eligible and seek services. States would not receive any new funds to support work activities or child care. States could receive bonuses for caseload reduction even if this was accomplished by denying benefits to whole families when the parents are willing to work but unable to find jobs. This provision has the potential to **significantly undermine SNAP's effectiveness as a safety net** in the next recession, as states would have an incentive to make it more difficult for unemployed workers and their families to receive food assistance. While the provision is highly problematic for all individuals in the program, among the recipients who would be most at risk are individuals with disabilities who are not yet receiving public benefits and families who have been cut off of TANF cash assistance because of personal or family challenges that interfere with work. States could use these bonuses for any purpose -- including building roads or cutting taxes on wealthy households.

- Section 109 would remove critical protections for unemployed individuals. The 1996 law imposed time limits on SNAP receipt for non-disabled working age adults without dependents who were not working or engaged in training; a crucial part of this legislation is the provision which allows states to waive this limit in times of high unemployment. The recent growth in SNAP receipt among this population was appropriate, given deep recession. Removing this waiver option would penalize unemployed individuals who could be denied benefits even if they were willing to work. The bill would not provide any additional funding to support work and training activities, and would not require states to offer such activities to recipients. Young adults who are facing historically low employment opportunities would be particularly at risk.
- **Section 105 would prevent states from using “broad-based categorical eligibility.”** According to the Congressional Budget Office, this would cut off SNAP for nearly 2 million individuals in 43 states and territories and undermine access to free school meals for 280,000 low-income children. This provision is contradictory to the goal of supporting families so they can save to improve their lives; families could lose benefits for saving just \$2,000 towards the cost of education, a reliable car, or moving to a safer neighborhood with better schools. The House bill would **also create “cliff effects” for some recipients**, where a small increase in earnings can result in a loss of benefits, leaving a family worse off than before. Further, eliminating categorical eligibility would create larger administrative burdens for states, increasing possible errors in the verification process and causing delays in the processing of applications.
- Section 136 would allow states to require drug testing of any SNAP applicant as a condition of eligibility. Suspicionless drug testing is a costly, flawed and ineffective means of identifying individuals in need of substance abuse treatment. It would

primarily have the effect of adding to the practical and emotional burden of applying for SNAP benefits, which is inconsistent with **SNAP's** mission of preventing hunger. Moreover, courts have consistently held that drug testing individuals as a condition of eligibility for public benefits is unconstitutional because it violates the standard that such tests be based on reasonable cause.

- Section 137 would permanently deny SNAP benefits to individuals convicted of certain felonies. This provision would punish people who have already served their time. It would also penalize their families or others who share households with them by reducing their SNAP benefits. Burdening those who live with ex-offenders simply isolates them further and increases the likelihood of recidivism. It is contradictory to the goal of support re-integrating ex-offenders into the workforce and the community so that they can achieve economic self-sufficiency.
- Section 107 would restrict states' ability to align SNAP and the Low Income Home Energy Assistance Program (LIHEAP) and would reduce benefits for an estimated 850,000 households. This provision would have the greatest impact on households with elderly members or members living with a disability.

SNAP has historically received strong bi-partisan support. We urge you to support a Farm bill that does not cut SNAP benefits or restrict access for vulnerable individuals and families.

Thank you.