



District of Columbia  
Office of Planning



**Proposed SNAP Rule: Requirements for Able-Bodied Adults Without Dependents (ABAWDs)  
Submit your comment by Wednesday, April 10<sup>th</sup>, 2019! (updated date!)**

**Update:** Due to technical difficulties with the federal register system, the USDA is reopening the comment period to April 8<sup>th</sup> to April 10<sup>th</sup>. You can submit your comments during the new comment period either directly to the federal register or through the FRAC comment platform by Wednesday, April 10<sup>th</sup>. More below in the “How can I get involved?” section.

On February 1, the US Department of Agriculture (USDA) proposed a new rule restricting how states can provide Supplemental Nutrition Assistance Program (SNAP, also known as food stamps) benefits to certain able-bodied adults without dependents (ABAWDs) aged 18 through 49.

Existing federal law limits ABAWDs to receive SNAP benefits for just 3 months out of every 36 months if they do not work or participate in an eligible training program for 20 hours a week. States have historically been able to apply for waivers to remove the time limit for the ABAWD population in areas where unemployment is high or sufficient jobs are not available. States also have been provided with a limited pool of individual exemptions they can apply on a case-by-case basis. This proposed rule would make it harder for states to qualify areas for waivers and undercut states’ ability to carry forward all accumulated individual exemptions.

Congress rejected similar proposals during the 2018 Farm Bill deliberations. USDA’s proposed rule ignores the bipartisan decision to support SNAP and instead rolls back flexibility for states and takes food away from very needy residents.

**Why do these changes to SNAP matter?**

The Trump Administration claims that the rule would encourage self-sufficiency among SNAP participants and encourage more ABAWDs to engage in work or work activities. However, research shows that work requirements do little to positively impact employment or earnings of ABAWDs and often fail to produce the desired employment effects.<sup>1</sup> Instead, work requirements dramatically reduce SNAP participation and increase food insecurity and economic insecurity among low-income populations. USDA estimates that the proposed rule will cut benefits for more than 755,000 low-income residents across the country, resulting in a \$15 billion reduction of benefits over the next ten years.

**What would be the impact of this proposed rule in the District?**

The District historically has qualified for waivers of the time limit, meaning that we have never had to impose these harsh work requirements on the District’s ABAWD population. The proposed rule change would restrict the type of economic metrics that will satisfy a jurisdiction’s waiver request. In doing so, it will undercut the ability of the District to protect SNAP benefits for ABAWDs who cannot document sufficient work hours, despite their residing in areas with insufficient jobs.

More than 118,600 residents in the District in November 2018 relied on SNAP benefits to access the food they needed to be healthy and thrive.<sup>2</sup> The District’s Department of Human Services (DHS) estimates that 20,000 ABAWDs reside in the District. The loss of SNAP benefits would negatively impact their health and wellbeing and cause serious economic and social harm to the entire city.

SNAP supports the local economy by generating an estimated \$1.79 in economic activity for every \$1 spent in SNAP benefits.<sup>3</sup> If the proposed rule is enacted, local healthy food retailers and farmers markets will likely see a sharp decline in revenue because of the reduced SNAP participation. In addition, communities currently lacking healthy food access will lose economic purchasing power to drive the demand for healthy food.<sup>4</sup>

The rule will also disproportionately impact low-income Black residents and other low-income residents living in Wards of the city with high unemployment and few available jobs. Due to changes in determining eligibility for local areas, Wards experiencing much higher rates of unemployment than the rest of the city – such as Ward 7 with an average rate of 9.9% unemployment and Ward 8 with 12.7% unemployment – will likely be unable to qualify for a waiver.<sup>5</sup>

### **How can I get involved?**

You can submit a public comment to share your input on the proposed rule. Due to technical difficulties with the federal register system, the **USDA is reopening the comment period to April 8<sup>th</sup> to April 10<sup>th</sup>**. You can submit your comments during the new comment period either directly to the federal registry or through the FRAC Comment Platform below.

The best way to submit a comment is through an online portal. You can use the **Food Research & Action Center’s** (FRAC) Comment Platform ([link here](#)) to submit a comment directly into the register. FRAC also has a sample letter you can use to create your comment ([link here](#)). You can also use the Federal eRulemaking Portal to submit your comment ([link here](#) for the direct page). The Federal eRulemaking Portal also contains the USDA’s justification for and the actual text of the proposed rule if you are interested in learning more.

Or you can submit your comment by mail to:

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

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<sup>1</sup> [https://www.urban.org/sites/default/files/publication/95566/work-requirements-social-safety-net-programs\\_4.pdf](https://www.urban.org/sites/default/files/publication/95566/work-requirements-social-safety-net-programs_4.pdf)

<sup>2</sup> <https://fns-prod.azureedge.net/sites/default/files/pd/29SNAPcurrPP.pdf>

<sup>3</sup> <https://www.ers.usda.gov/topics/food-nutrition-assistance/supplemental-nutrition-assistance-program-snap/economic-linkages/>

<sup>4</sup> <https://www.cbpp.org/research/food-assistance/snap-boosts-retailers-and-local-economies>

<sup>5</sup> [https://does.dc.gov/sites/default/files/dc/sites/does/page\\_content/attachments/DC%20Ward%20Data%20Jan19-Dec18-Jan18.pdf](https://does.dc.gov/sites/default/files/dc/sites/does/page_content/attachments/DC%20Ward%20Data%20Jan19-Dec18-Jan18.pdf)