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## Greenstein: Trump SNAP Proposal Would Cost Many of Nation's Poorest Their Food Aid

*CBPP today released the following statement from Robert Greenstein, president, on the proposed SNAP rule changes released by the U.S. Department of Agriculture:*

The Trump Administration proposed draconian changes today in a key SNAP (food stamp) rule which, if implemented, would cut off basic food assistance for hundreds of thousands of the nation's poorest and most destitute people. The Administration and House Republican leaders sought, but failed, to secure these changes as part of the farm bill that Congress just passed. The Administration is now proposing to implement, through executive action, what it failed to secure through legislation.

Those affected are SNAP participants ages 18 through 49 who aren't raising minor children in their homes. The people whom the rule change would affect are among the poorest of the poor, U.S. Department of Agriculture (USDA) data show. Their average income is just 33 percent, or one-third, of the poverty line.

Here's the background. A longstanding, harsh provision of SNAP law limits these 18-through-49-year-olds to just *three months* of SNAP benefits (in months that they're not employed at least 20 hours a week) out of every *three years*. Participation in a work or training program counts toward fulfilling this requirement, but states aren't required to provide work or training slots to these individuals — and *most states don't*. In addition, pounding the pavement and searching hard for a job does *not* count toward meeting the requirement. If you can't find a 20-hour-a-week job, on your own, you're cut off SNAP anyway.

Because of its extremely harsh nature, this part of the SNAP law also includes a critical provision that lets states seek, and USDA grant, *waivers* of this three-month cut-off in areas where jobs for these individuals are lacking, such as when unemployment is elevated. From the provision's enactment in 1996 until now, Democratic and Republican administrations alike have operated under a common set of rules in considering and granting waivers from the three-month cut-off. Now, the Trump Administration is seeking to jettison these longstanding, bipartisan rules — and replace them with an alternative that's certain to increase hunger and destitution.

The Administration's proposal would *eliminate* the most commonly used bases for waivers under the longstanding rules that have guided presidents of both parties. And by ending most waivers, the rule would almost certainly cut off basic food aid to several hundred thousand indigent people. Most of these individuals are ineligible for any form of government cash assistance because they're not elderly, severely disabled, or raising minor children. For many of them, SNAP is the only assistance they can receive to help make ends meet.

Here's one way to illustrate the proposed rule's severity: Let's say a state or local area had an overall unemployment rate of 6.8 percent. That usually would mean that African-American unemployment — which is generally about twice the white unemployment rate — would very likely be in double digits. And the rate for people of all races who are 25 and over and lack a high school diploma or GED would be around 10 percent. Nevertheless, the federal government would flatly deny a waiver request under the proposed rule. Destitute individuals with little chance of finding a job would be cut adrift.

The proposal would hit hard at people who are between jobs or whose employers have cut their hours to less than 20 hours a week, which occurs not infrequently in the very-low-wage labor market even when the economy is strong. And it occurs even more frequently when the economy weakens and a possible recession looms — something that a growing number of economists predict for 2020 or 2021.

Those hit the hardest would be those with the greatest difficulties in the labor market, including adults with no more than a high school education — whose unemployment rate is much higher than the overall unemployment rate — and people living in rural areas where jobs are often harder to find.

People of color would be at particular risk, given their much higher unemployment rates and continued racial discrimination in labor markets. As noted, the African-American unemployment rate has long been roughly double the non-Hispanic white unemployment rate. Studies have found that white job applicants are much likelier to receive callbacks after job applications or interviews than equally qualified Black applicants.

The Administration may portray its proposal as a reasonable “work requirement.” But as noted, most states don't offer these people any job, training opportunity, or slot in a work program, and people who are “playing by the rules” and looking hard for a job are cut off nonetheless.

Moreover, the history of the three-month cut-off shows that some people who should qualify for an exemption from it because they suffer from a significant health condition often don't get one and lose their SNAP benefits anyway, because they can't satisfy the paperwork and other bureaucratic hurdles involved in securing an exemption.

In its current form, the three-month cut-off provision is already severe. A study of some years ago found that many people who lost food assistance after three months subsequently couldn't afford adequate food, faced housing problems, had trouble paying utility bills, or encountered other serious difficulties.

Instead of punishing these unfortunate and often destitute people, the President should seek to assist them with policies such as more and better job training and employment programs, a higher minimum wage, and a strengthened Earned Income Tax Credit. Denying them basic food and nutrition is not the route that a fair and compassionate administration of either party would take.

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