March 8, 2019  
Certification Policy Branch  
SNAP Program Development Division  
Food and Nutrition Service, USDA  
3101 Park Center Drive  
Alexandria, VA 22303

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

Dear Certification Policy Branch,

On behalf of the Jesuit Conference Office of Justice and Ecology, I write to oppose USDA's proposed rule on Requirements for Able-Bodied Adults Without Dependents in the Supplemental Nutrition Assistance Program (SNAP). Jesuit parishes, schools, and social service ministries across the country serve people who experience hunger and rely on SNAP for their daily bread. The proposed rule change will make it much harder for many of them to make ends meet. The federal government should be protecting and strengthening programs that reduce hunger rather than making it more difficult for vulnerable people to receive the food assistance they need.

Pope Francis reminds us that “hunger is criminal; nourishment is an inalienable right.” The Catholic Church recognizes that the best way out of poverty is through employment that respects the full dignity of the worker. Unfortunately, for many people today access to meaningful, dignified, and stable employment is difficult to obtain. The Center on Budget and Policy Priorities notes that increases in employment among public benefits recipients subject to work requirements were modest and faded over time. Further, there is little evidence that stricter work requirements are effective in reducing poverty—the same report found that the vast majority of individuals subject to work requirements remained poor, and some became poorer. For these reasons, we strongly oppose the proposed rule.

According to USDA's own estimates, if enacted, this rule will eliminate access to SNAP for as many as 755,000 people, resulting in a loss of critical food assistance and increased hunger and poverty. This could in turn create an additional barrier for those affected to finding and maintaining meaningful employment. The consequences are costly—to individuals, employers, the healthcare system, and the U.S. economy.

Access to food is a right for all, including those who are unable to work, looking for work, or working for poverty-level wages. Rather than implementing this proposed rule, we believe that lawmakers and the federal government should instead focus on helping to lift people out of poverty: for instance, improving and expanding job training programs and employment services; strengthening work supports, such as the Earned Income Tax Credit; and raising the minimum wage.

This proposed rule change raises fundamental questions about who we want to be as a society—a society that recognizes the God-given dignity of every person, no matter their circumstances, or a society that fails to provide for the basic needs of its most vulnerable members.

Thank you for the opportunity to submit these comments.

Sincerely,

Ted Penton, SJ  
Secretary  
Office of Justice and Ecology  
Jesuit Conference of Canada and the United States