



Public Comment of Co-Chairmen Horace Cooper, Council Nedd II and Stacy Washington on U.S. Department of Agriculture Proposed Rule “Supplemental Nutrition Assistance Program: Requirements for Able-Bodied Adults Without Dependents” (FNS-2018-0004/RIN 0584-AE57)

submitted 3/30/19

To give black Americans a better deal by removing the barriers blocking them from empowerment and ensuring they have an equal chance to attain the American dream, the [Project 21](#) black leadership network recommended “[i]nstituting a second wave of welfare reform, starting with adding a work requirement to be eligible for the Supplemental Nutrition Assistance Program” (SNAP).

This recommendation, found in Project 21’s [“Blueprint for a Better Deal for Black America,”](#) aligns with the intent of the [proposed rule](#) by the U.S. Department of Agriculture (FNS-2018-0004/RIN 0584-AE57) to strengthen the standards by which states are allowed to waive existing work requirements for eligibility for SNAP benefits.

When SNAP work requirement waivers were instituted by the Obama Administration, unemployment was high. With the American economy in recovery and unemployment recently posting all-time lows, waivers as they are used in dozens of state are unnecessary and unproductive.

In its Blueprint, Project 21 [pointed out](#) that “too many black families today suffer from a non-racial scourge – conditions that undermine upward mobility and perpetuate unacceptable levels of poverty, crime and other social ills.” It added: “The vaunted social safety net has become a web that ensnarls black families in a vicious cycle of dependency.”

The [proposed rule](#) would address the unwarranted flexibility within the current waiver standards to “ensure that such a large percentage of the country can no longer be waived when the economy is booming and unemployment is low.” It would still be limited to able-bodied adults without dependents (ABAWDs) and allow waivers in localities where the unemployment rate remains over 10 percent or has a “lack of sufficient jobs.”

In January of 2019, there were a [reported](#) 7.58 million job openings and 6.54 million unemployed Americans. [At that time](#), the white unemployment rate was 4 percent, compared to the black unemployment rate of 7.4 percent. Black SNAP participation was around [25.7 percent](#) in 2013 while constituting just [13 percent](#) of the overall population. This disparity is

unacceptable, and a means of channeling those on public assistance into the workforce is an essential means of addressing the problem.

Work requirements contained in welfare reform passed by Congress during the Clinton Administration helped get people off public assistance and into jobs that gave them self-worth, fiscal empowerment and independence. As a Heritage Foundation analysis [noted](#): “During the late 1990s, employment of never-married mothers increased by nearly 50 percent, of single mothers who are high school dropouts by 66 percent, and of young single mothers (ages 18 to 24) by nearly 100 percent.”

The Obama era waiver loophole helped SNAP enrollment skyrocket. Between 2008 and 2012, participation in SNAP rose by approximately [70 percent](#). During the Trump Administration, enrollment has [fallen](#) by almost 4 million cases as of November of 2018. A lot of the decrease is attributed to state-level work requirement policies that challenge the federal waiver allowance.

Work requirements work. In [Maine](#), the caseload for ABAWDs declined by almost 80 percent in 2015 due to the introduction of work requirements. In [Arkansas](#), the caseload declined almost 70 percent in the first year. In [Kansas](#), the caseload dropped around 78 percent between 2011 and 2017.

Reducing welfare caseloads does not just help individuals. Their success has a return on investment in the form of reduced government spending, reallocation of resources to the truly needy and increased tax revenues. It is also a benefit to employers who are introduced to a new pool of potential workers. As these workers mature in their careers, their potential for new skills, savings and other success increases.

“The application of waivers on a more limited basis,” the proposed rule [noted](#), “would encourage more ABAWDs to take steps toward self-sufficiency.”

Upon the announcement of the proposed rule on SNAP waivers, Project 21 member Emery McClendon [said](#) in a press release: “Our government has programs in place to help citizens who fall on hard times. Programs such as SNAP are intended to be temporary. It would greatly enhance those who are enrolled in these programs as well as the communities in which they live if there were work or training requirements linked to continued assistance.” Project 21 member Derrick Hollie [added](#): “Getting people into job training and restoring the dignity of work is vital to maintaining our nation’s economic success.”

It is this dignity that can be generated through gainful employment that nurtures and fuels American exceptionalism. This is the dividend of a robust work requirement policy.

And work requirements are popular. A January 2018 poll [commissioned](#) by the Foundation for Government Accountability found that an overwhelming [90 percent](#) of likely voters supported welfare eligibility requirements that included work, volunteering or job training on the part of recipients.

Welfare reform was working until waivers were allowed to return the safety net to the status quo and incentivize poverty. The proposed rule to strengthen waiver standards for SNAP can put reform back on the rails.

These comments are submitted by Horace Cooper, Council Nedd II and Stacy Washington – the co-chairmen of the Project 21 black leadership network.