



**Public Comment of Donna Jackson 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**

Arkansas provides a model for the nation on the advantages of having work requirements for able-bodied adults without dependents (ABAWDs) to receive public benefits.

With the federal rule under consideration to tighten criteria by which a state may waive work requirements for Supplemental Nutrition Assistance Program (SNAP) benefits (FNS-2018-0004/RIN 0584-AE57), the Arkansas example shows how the “Land of Opportunity” has used the welfare safety net to help people realize their full potential.

Broad [waivers](#) to SNAP work requirements were instituted early in the Obama Administration with the assertion they were necessary to compensate for high unemployment related to an economy in recession. Food stamp enrollment doubled between 2008 and 2010. But times have changed. The economy is now much stronger, and [14 states](#) reported record-low unemployment levels by early 2018.

When states refuse to enforce work requirements, they effectively incentivize poverty. Worse, they create an environment in which people are not encouraged to realize their potential for economic growth, advancement and independence. It fails to recognize, as the U.S. Department of Agriculture pointed out in the [proposed rule](#) that “long-term, stable employment provides the best path to self-sufficiency for those who are able to work.”

As a former employee of the Arkansas Office of Workforce Development, I saw how work requirements and job training opportunities helped people rise out of bad economic situations. Linking welfare eligibility to employment and training was not done because of an opposition to giving people a handout, but to give them a hand up so they may increase their skills, self-esteem and economic security.

In my work in the area of child development, we were able to train welfare recipients in the childcare field. This increased the quality and amount of childcare services in the state. It introduced these people to the workforce, and it introduced employers to a new pool of able workers. It’s a win-win scenario.

While Arkansas had previously relaxed SNAP work requirements, Governor Asa Hutchinson allowed that federal waiver to expire. In January of 2016, the Arkansas Department of Human Services [began](#) statewide enforcement of a 20-hour work requirement for able-bodied individuals between 18 and 49 years old without dependents.

A 2019 analysis of the Arkansas SNAP work requirement by the Foundation for Government Accountability (FGA) [declared](#) the state has “become a national leader on welfare reform and thousands of able-bodied adults have moved from welfare to work.”

According to the FGA [report](#), SNAP enrollment in Arkansas fell by approximately 70 percent during the first year of the work requirement. Of those who left the program, they earned approximately \$2 for every dollar they had been given in SNAP benefits. Over the two years after leaving the program, their salaries grew by an average of 204 percent. For the state, declining welfare caseloads and the cost of public benefits fell by around \$28 million by the end of 2016. Those who joined the workforce also paid an estimated \$2.3 million more in taxes than when they were receiving SNAP benefits.

With the transition of more people from the welfare rolls to the workforce, the savings and additional revenue mean more resources for truly needy people such as the elderly and disabled. FGA concluded that “if states want less dependency, more taxpayers and higher incomes, policymakers should pursue work requirements for all able-bodied adults on welfare.”

Work requirement reform in Arkansas has been considered so successful that the Arkansas House of Representatives [voted](#) an overwhelming 67-19 in March of 2019 to expand the work requirement up to age 60 and also include those with children over the age of six.

Enforcing strong ABAWD work requirements for SNAP eligibility nationwide could help other states achieve the same success as Arkansas. This is a transformation I have witnessed first-hand. It provides financial as well as emotional gains for those who need it most.

My name is Donna Jackson. I submit these comments as a member of the [Project 21](#) black leadership network. Project 21 endorsed a [SNAP work requirement](#) in “a second wave of welfare reform” as part of its [“Blueprint for a Better Deal for Black America.”](#)