



Public Comment of Marie Fischer 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)

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If you are able-bodied, government assistance should be a safety net and not a hammock.

This should be common sense as much as it should be governmental policy. And this is why the proposed rule to enforce a more realistic way of dealing with welfare programs is so important.

I should know because I have first-hand experience of being reliant on government assistance.

Almost a year ago, President Donald Trump issued [Executive Order 13828](#) – “Reducing Poverty in America by Promoting Opportunity and Economic Mobility.” It is a government-wide mandate “to clear paths to self-sufficiency, reserving public assistance programs for those who are truly in need.” It charged each relevant agency with doing “everything within its authority to empower individuals by providing opportunities for work, including by investing in Federal programs that are effective at moving people into the workforce and out of poverty” and examining existing programs “to ensure that they are consistent with principles that are central to the American spirit – work, free enterprise and safeguarding human and economic resources.”

This was [praised](#) by [Project 21](#) – the black leadership network of which I am a member. Project 21 subsequently commended Secretary of Housing and Urban Development Ben Carson for embracing a [work requirement](#) for eligibility for subsidized housing.

In that same spirit, Project 21 also supports the intent of the [proposed rule](#) (FNS-2018-0004/RIN 0584-AE57) from the U.S. Department of Agriculture to strengthen the existing work requirement for eligibility for Supplemental Nutrition Assistance Program” (SNAP) benefits.

Both of the HUD and Agriculture policies are compliant with Project 21’s [“Blueprint for a Better Deal for Black America”](#) – a 57-point agenda designed “to remove barriers blocking blacks from reaching their full potential and ensuring the American dream is attainable for all.”

The [proposed rule](#) would help to tighten the criteria by which a state can apply a waiver to existing requirements for able-bodied adults without dependents (ABAWDs) to be “working and/or participating in a qualifying work program at least 20 hours per week (averaged monthly

to 80 hours per month) or by participating in and complying with workfare” to maintain eligibility for SNAP benefits on a more than temporary basis.

Particularly in the present era of economic prosperity, these waivers can be counterproductive. The [proposed ruled](#) noted that questionable reporting data and standards “should be reevaluated.” In doing so, the process is still meant to be mindful of those who are not ABAWDs or live in areas with genuine employment problems. Compassion remains a crucial factor, and that is something I appreciate.

As someone who was once on food stamps, I understand the necessity of government assistance. But I also understand the need for having a requirement for work, volunteerism or job training in which ABAWDs must engage in to continue to participate in government assistance programs. There is no excuse for those on welfare to not try to help their community and help themselves.

When I lost a job after 20 years in the workforce, I was on assistance with two dependents. I needed help, but I was determined to make government assistance a temporary condition. Those benefits helped me look for work. I also was able to take a certification course to find a new and better position.

I only needed assistance for short time because I knew it was not a way of life for me or my children. And I did this even though I was not classified as an ABAWD. This is the way it should be, but it often isn't. Too many adopt welfare as a sole source of income.

A Cato Institute study of welfare benefits found the right combination of assistance programs available to many recipients, and their untaxed status, “pays very well” – sometimes better than a \$15-an-hour job. Cato Senior Fellow Michael Tanner [wrote](#) that “[b]y not working, welfare recipients may be responding rationally to the incentives our public policy makers have established.” The Cato suggestion was “strengthening welfare work requirements, removing exemptions and narrowing the definition of work.”

With this proposed rule, SNAP eligibility will promote the acquisition of skills, boost participation in the job market begging for applicants, and allow for a smarter allocation of taxpayer resources for those among us who must rely on our charity.

My name is Marie Fischer. I submit these comments as a member of the Project 21 black leadership network.