USDA Request for Public Comment: SNAP Requirements for Able-bodied Adults Without Dependents

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On behalf of Children's Hospital of Philadelphia, researchers at PolicyLab responded to a request for comment on a notice of proposed rulemaking for the U.S. Department of Agriculture (USDA) that would change SNAP regulations for able-bodied adults without dependents (ABAWDs). Under current law, work requirement restrictions are already in place for ABAWDs receiving SNAP benefits. However, the current law also gives states flexibility to request work requirement exemptions from USDA for locations with high unemployment rates or limited job availability, as well as to extend SNAP benefits for a limited number of recipients who do not meet the work requirement beyond current time restrictions. The proposed rule would change the way in which the USDA evaluates state requests and would make it more difficult for states to extend SNAP benefits for those who need additional support. These changes threaten to put a strain on the health and finances of adults—and because we know children do better when their caregivers do better, they also put at risk the many low-income kids and teen in unique living situations, including those with non-custodial parents, children whose extended family members help to support them, children impacted by the opioid crisis, as well as youth aging out of the foster care system and unaccompanied homeless youth.

The PolicyLab researchers' response cites extensive research on the benefits of SNAP on the health and well-being of kids and families, and highlights the potential strain on the health care system to treat the negative physical and mental health outcomes that accompany food insecurity. Children's Hospital of Philadelphia respectfully requests that USDA reconsiders its position.

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