



**CONSORTIUM FOR CITIZENS  
WITH DISABILITIES**

May 7, 2018

The Honorable Paul Ryan  
Speaker, U.S. House of Representatives  
U.S. Capitol, H-232  
Washington, DC 20515

The Honorable Nancy Pelosi  
Minority Leader, U.S. House of Representatives  
U.S. Capitol, H-204  
Washington, DC 20515

**RE: H.R. 2, Agriculture and Nutrition Act of 2018 (Farm Bill)**

Dear Speaker Ryan and Leader Pelosi,

The undersigned members of the Consortium for Citizens with Disabilities (CCD) urge you to continue the longstanding bipartisan commitment to protect and strengthen the Supplemental Nutrition Assistance Program (SNAP) by rejecting proposals to restrict eligibility, reduce benefits, cap or reduce funding, or make harmful structural changes to SNAP in the Farm Bill.

CCD is the largest coalition of national organizations working together to advocate for federal public policy that ensures the self-determination, independence, empowerment, integration and inclusion of children and adults with disabilities in all aspects of society.

**In the United States, all too often food insecurity and disability go together.** Families that include people with disabilities are *two to three times more likely* to experience food insecurity than families that have no members with disabilities.<sup>1</sup> Similarly, people experiencing food insecurity have increased likelihood of chronic illness and disability.

**SNAP is vitally important for people with disabilities and their families.** By increasing access to adequate, nutritious food SNAP plays a key role in reducing hunger and helping people with disabilities to maximize their health and participate in their communities.

- Using an inclusive definition of “disability,” in 2015 an estimated 11 million people with disabilities of all ages received SNAP, representing roughly one in four SNAP participants.<sup>2</sup>
- Roughly 4.4 million households with non-elderly adults with disabilities received SNAP in 2016.<sup>3</sup>

- Non-elderly adults with disabilities who receive SNAP have very low incomes, averaging only about \$12,000 per year in 2016.<sup>4</sup>
- SNAP benefits are extremely modest, averaging \$187 per month for non-elderly people with disabilities in 2016 – or just \$6 per day.<sup>5</sup>

**Existing SNAP time limits are harsh, unfair, and harm many people with disabilities and their families by cutting off essential food assistance.** Federal law currently limits SNAP eligibility for adults between the ages of 18 to 49 without dependents to just three months out of every three years – unless they can engage in work or job training activities at least half time, or qualify for an exemption. These provisions cut off food assistance at a time when people need it most and do not result in increased employment and earnings. At least 500,000 low-income individuals nationwide lost SNAP in 2016 due to this time limit.<sup>6</sup>

Many people with disabilities are already hurt by SNAP time limits, despite existing exemptions for people who receive governmental or private benefits on the basis of a disability or are able to document that they are “physically or mentally unfit for employment.”<sup>7</sup> For example, in a study of SNAP participants subject to time limits referred to participate in work activities in Franklin County, Ohio, one-third reported a “physical or mental limitation”.<sup>8</sup>

**Cutting off food assistance from SNAP would only make it harder for people to work and increase their economic self-sufficiency.** We strongly oppose any action that would cut off or reduce SNAP benefits, narrow eligibility, or force more people to navigate harsh and unnecessary program rules, including people with disabilities and their families.

In particular, we are concerned that the Farm Bill advanced by the House Committee on Agriculture on April 18, 2018 includes a number of provisions that would harm people with disabilities and their families. Small increases in the proposed bill are insufficient to make up for significant benefit reductions.

- **New work requirements with highly punitive rules would cut off SNAP benefits for many people – including in families with children, adults, and seniors with disabilities.** It may seem simple to assert that “people with disabilities will be exempt,” but converting such a statement into an effective policy process is complicated, expensive, and fundamentally flawed. Many people with disabilities receive SNAP, but do not meet SNAP’s statutory definitions of “disability” or have not been so identified. Under SNAP, states have no obligation to help people prove they are exempt, even if they have difficulty obtaining the necessary records or verification from a doctor. In addition, states are under no obligation to ensure that people with disabilities have access to the full array of services they might need to work – such as accessible transportation, supported employment, and personal care aide services. People with disabilities often want to work, but need additional supports and services to obtain and keep jobs, in addition to facing discrimination and misconceptions about their ability to work.
- **Underfunded work programs would be woefully inadequate to meet training needs.** Proposed new investments in SNAP employment and training programs – funded in large

part by benefit cuts – amount to only about \$30 per person per month.<sup>9</sup> This amount would be grossly insufficient to provide adequate employment services for people subject to proposed new work requirements, including jobseekers with disabilities.

- **New reporting requirements would create major hurdles to benefits.** Proposed new reporting requirements related to eligibility, employment and training, and time limits would be extremely difficult for many people with disabilities to navigate and comply with. For example, ending a decades-old simplification measure and instead requiring people to share utility bills with the SNAP office – or else, see their benefits reduced – is harsh, unnecessary, and burdensome both for SNAP participants and states.

If Congress wishes to explore meaningful opportunities for SNAP participants to increase self-sufficiency through employment, we recommend awaiting the results of the Employment & Training pilot projects authorized under the 2014 Farm Bill. The U.S. Department of Agriculture (USDA) awarded pilot grants in 2015, all 10 state programs are operational, and evaluation activities will operate through 2021. Already, a number of pilot states have cited multiple barriers faced by participants, including “health issues.”<sup>10</sup> It will be important for USDA and the evaluators to carefully explore the experiences and outcomes of people with disabilities and their families in these pilot programs. Congress should await the final pilot evaluations before considering any changes in these areas.

We call on you to reject proposals that would weaken SNAP’s effectiveness as our nation’s foremost anti-hunger program by limiting access, reducing benefits, or creating administrative hurdles. **We urge all Members to vote no on the Agriculture and Nutrition Act of 2018 as approved by the Agriculture Committee on April 18, and instead to work on a bipartisan basis to strengthen and protect SNAP as part of the Farm Bill.**

Sincerely,

**CCD members:**

ACCSES  
Allies for Independence  
American Association of People with Disabilities  
American Association on Health and Disability  
American Diabetes Association  
American Foundation for the Blind  
American Network of Community Options and Resources (ANCOR)  
American Psychological Association  
Association of University Centers on Disabilities (AUCD)  
Autism Society  
Autistic Self Advocacy Network  
Bazelon Center for Mental Health Law  
Brain Injury Association of America  
Center for Public Representation

Christopher & Dana Reeve Foundation  
Community Legal Services of Philadelphia  
Council of Administrators of Special Education  
Disability Rights Education & Defense Fund  
Division for Early Childhood of the Council for Exceptional Children (DEC)  
Easterseals  
Epilepsy Foundation  
Institute for Educational Leadership  
The Jewish Federations of North America  
Justice in Aging  
Lutheran Services in America Disability Network  
National Alliance on Mental Illness  
National Association of Councils on Developmental Disabilities  
National Association of State Directors of Special Education (NASDSE)  
National Association of State Head Injury Administrators  
National Committee to Preserve Social Security and Medicare  
National Disability Institute  
National Disability Rights Network  
National Down Syndrome Congress  
National Organization of Social Security Claimants' Representatives (NOSSCR)  
School Social Work Association of America  
SourceAmerica  
TASH  
The Arc of the United States  
United Spinal Association

**Joined by:**

Lakeshore Foundation

cc: Members, U.S. House of Representatives  
Members, U.S. Senate

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<sup>1</sup> Carlson, Steven, Keith-Jennings, Brynne, and Chaudhry, Raheem (2017). *SNAP Provides Needed Food Assistance to Millions of People with Disabilities*. Washington, DC: Center on Budget and Policy Priorities (CBPP).

<https://www.cbpp.org/research/food-assistance/snap-provides-needed-food-assistance-to-millions-of-people-with>.

<sup>2</sup> Ibid. CBPP analyzed data from the National Health Interview Survey, which looks at disability more inclusively than the relatively narrow SNAP program definitions of “disability” used by the USDA to identify people with disabilities for administrative purposes. In 2015, USDA administrative data identified 5.3 million SNAP recipients with disabilities.

<sup>3</sup> U.S. Department of Agriculture. (2017). *Characteristics of Supplemental Nutrition Assistance Program Households: Fiscal Year 2016*. <https://fns-prod.azureedge.net/sites/default/files/ops/Characteristics2016.pdf>.

<sup>4</sup> Ibid.

<sup>5</sup> Ibid.

<sup>6</sup> Center on Budget and Policy Priorities (2018). *Policy Basics: The Supplemental Nutrition Assistance Program (SNAP)*. <https://www.cbpp.org/research/policy-basics-the-supplemental-nutrition-assistance-program-snap>.

<sup>7</sup> 7 C.F.R. § 273.24(c)(2).

<sup>8</sup> Ohio Association of Foodbanks. (2015). *Work Experience Program, Franklin County Comprehensive Report: Able-Bodied Adults Without Dependents 2014-2015*. [http://admin.ohiofoodbanks.org/uploads/news/ABAWD\\_Report\\_2014-2015-v3.pdf](http://admin.ohiofoodbanks.org/uploads/news/ABAWD_Report_2014-2015-v3.pdf).

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<sup>9</sup> Bolen, Ed et al. (2018). Chairman Conaway’s Farm Bill Would Increase Food Insecurity and Hardship. Washington, DC: CBPP. <https://www.cbpp.org/research/food-assistance/chairman-conaways-farm-bill-would-increase-food-insecurity-and-hardship>.

<sup>10</sup> U.S. Department of Agriculture, *Evaluation of SNAP Employment and Training Pilots: Fiscal Year 2017 Annual Report to Congress*. <https://fns-prod.azureedge.net/sites/default/files/snap/SNAP-E-and-T-Report-Congress-FY2017.pdf>.