

September 17, 2018

Dear Farm Bill Conferees:

We write on behalf of the below 88 organizations dedicated to advancing the health, economic security, and opportunity of women and families and eradicating their barriers to success. As the conference committee negotiates the reauthorization of the Agriculture and Nutrition Act (the “Farm Bill”), we urge you to include provisions that protect and strengthen the Supplemental Nutrition Assistance Program (SNAP) for the women and children who rely on the program to put food on the table during times of need. Policies that do not address the complex realities of the lives of women with low incomes, and their families, would undermine their ability to meet their basic needs, including their health, well-being, and economic security. The proposed changes to SNAP in H.R. 2, the version of the Farm Bill passed by the House of Representatives, which would restrict categorical eligibility, require mandatory participation in the federal child support enforcement program, include harsh expansions of work requirements, and increase paperwork for families and states, would threaten the economic security of women and families. The conference committee should adopt provisions that protect access to SNAP for low-income women and children and strengthen the program.

Millions of people across the country face challenges in feeding their families.¹ Many people are just one job loss, one schedule downgrade, or one sickness away from needing SNAP to help feed their families. SNAP is critical in filling this need. In Fiscal Year (FY) 2017, SNAP served more than 42 million people in nearly 20.4 million households on average each month.² Half of children in the U.S. will receive SNAP at some point during childhood, and half of all adults will do so at some point between the ages of 20 and 65.³ SNAP is also essential to women, who make up 63 percent of SNAP adult recipients.⁴ SNAP serves a diverse group of people of every race, age, sexual orientation, gender identity, and disability status in rural, suburban, and urban

¹ COLEMAN-JENSEN ET AL., U.S. DEP’T OF AGRIC., HOUSEHOLD FOOD SECURITY IN THE UNITED STATES IN 2017, at 5-6 (Sept. 2018), available at <https://www.ers.usda.gov/webdocs/publications/90023/err-256.pdf?v=0>.

² U.S. DEP’T OF AGRIC., SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM PARTICIPATION AND COSTS (updated Aug. 3, 2018), available at <https://fns-prod.azureedge.net/sites/default/files/pd/SNAPsummary.pdf>.

³ FOOD RES. & ACTION CTR., THE ROLE OF THE SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM IN IMPROVING HEALTH AND WELL-BEING (Dec. 2017), available at <http://www.frac.org/wp-content/uploads/hunger-health-role-snap-improving-health-well-being.pdf>.

⁴ CTR. ON BUDGET AND POL’Y PRIORITIES, HOUSE FARM BILL’S SNAP CUTS, WORK REQUIREMENTS WOULD HURT WOMEN 1 (updated July 2018), available at <https://www.cbpp.org/sites/default/files/atoms/files/5-1-18fa-brief-women.pdf>; KAYLA PATRICK, JASMINE TUCKER & AMY MATSUI, BY THE NUMBERS: DATA ON KEY PROGRAMS FOR THE WELL-BEING OF WOMEN & THEIR FAMILIES 6 (June 2018), available at <https://nwlc-ciw49tixgw51bab.stackpathdns.com/wp-content/uploads/2018/06/FINAL-By-The-Numbers.pdf>.

areas of the United States.⁵

Congress should combat hunger and food insecurity by protecting and strengthening SNAP. Yet, the House version abandons that bipartisan approach and contains harsh proposals that would lead to more than 2 million individuals losing SNAP benefits altogether or having them reduced.⁶ The conference committee should reject the SNAP-related proposals in the House Farm Bill, and instead endorse those in the Senate version.

Protect parents raising children on their own, including survivors of domestic violence, from unnecessary mandates that would threaten their access to food.

The House Farm Bill's proposal requiring single parents to participate in the federal child support enforcement program could harm unmarried mothers, including survivors of domestic violence. Currently, states decide whether or not SNAP recipients must participate in the federal child support enforcement program, and only a few states have adopted the option.⁷ Moreover, single parents, most of whom are mothers, often have good reasons for deciding not to engage with child support enforcement officials. Some who may receive support (whether through informal arrangements or divorce-related agreements) may not want to jeopardize their relationship with the noncustodial parent to pursue enforcement, especially if they know the other parent cannot pay. Moreover, some parents, including survivors of domestic violence, may decide that seeking a child support order and payment would put them or their children at risk.⁸ Taking SNAP benefits away from single parents who decide that pursuing child support enforcement is not in their family's best interest asks them to make untenable choices between basic food assistance and, in some cases, their physical safety. The conference committee should reject this proposal.

Protect policies that help working families access sufficient food.

The House farm bill proposes a \$5 billion ten-year cut to SNAP food benefits by eliminating a

⁵ NAT'L WOMEN'S LAW CTR. & FOOD RES. & ACTION CTR., CUTTING FOOD ASSISTANCE IS A BAD DEAL FOR WOMEN AND FAMILIES 1 (May 2018), available at <https://nwlc.org/resources/cutting-food-assistance-is-a-bad-deal-for-women-and-families/> (providing FY 2016 data for women and children participation in SNAP and survey data for LGBT participation).

⁶ ED BOLEN ET AL., CTR. ON BUDGET AND POL'Y PRIORITIES, CHAIRMAN CONAWAY'S FARM BILL WOULD INCREASE FOOD INSECURITY AND HARDSHIP (updated Apr. 18, 2018), <https://www.cbpp.org/sites/default/files/atoms/files/4-16-18fa.pdf>.

⁷ BOLEN, *supra* note 6, at 16.

⁸ SHAINA GOODMAN, NAT'L RESOURCE CENTER ON DOMESTIC VIOLENCE, THE DIFFERENCE BETWEEN SURVIVING AND NOT SURVIVING: PUBLIC BENEFITS PROGRAMS AND DOMESTIC AND SEXUAL VIOLENCE VICTIMS' ECONOMIC SECURITY (Jan. 2018), available at <https://vawnet.org/material/difference-between-surviving-and-not-surviving-public-benefits-programs-and-domestic-and>.

state option (broad-based categorical eligibility) that allows states to adjust SNAP asset tests and to screen families with gross incomes slightly above 130 percent of the poverty line, who often have significant expenses like child care and housing, to determine if they qualify for a SNAP benefit. Many states have chosen this simplification option.⁹ The proposed change would take SNAP away from low-income working people with children; re-impose a “cliff effect” when they improve their earnings; eliminate their children’s direct connection to free school meals,¹⁰ which CBO estimates would cause 265,000 children to lose access to their free school meals;¹¹ and significantly increase states’ administrative costs and burdens.

In contrast, the Senate bill would keep food on the tables of low-income families by continuing to allow states to screen households with modest gross incomes between 130 percent and 200 percent of the Federal Poverty Level to determine if they have expenses such as housing and child care that would make them qualify for a benefit under SNAP’s net income threshold. The conference committee should include the Senate proposal, rather than the House version.

Invest in meaningful efforts to increase access to employment and training opportunities, and not punitive policies that would take food away from families.

The majority of adult SNAP recipients who can work, do work.¹² And SNAP already contains work requirements. The statute requires all working-age adults (with limited exceptions) to register for work and accept a job if offered.¹³ In addition, individuals aged 18 to 49 who are not pregnant or caring for a child or family member who is “incapacitated,” do not have a disability, and are not otherwise exempt from the general SNAP work requirements cannot receive SNAP for more than three months in a 36-month period if they do not work or participate in a work training program for at least 20 hours a week.¹⁴ Furthermore, states can go further than the statute and impose tougher work requirements (up to 30 hours per week) on most adult SNAP recipients and cut off benefits, including those for children in the household, for people who do not meet the requirements.¹⁵

⁹ U.S. DEP’T OF AGRIC., BROAD-BASED CATEGORICAL ELIGIBILITY (Feb. 2018), *available at* <https://fns-prod.azureedge.net/sites/default/files/snap/BBCE.pdf>.

¹⁰ See FOOD RES. & ACTION CTR., SNAP AND SCHOOL MEALS, *available at* <http://www.frac.org/wp-content/uploads/snap-categorical-eligibility-and-school-meals.pdf>.

¹¹ CONG. BUDGET OFF., COST ESTIMATE: H.R. 2 AGRICULTURE AND NUTRITION ACT OF 2018 (May 2, 2018), *available at* https://www.cbo.gov/system/files?file=2018-07/hr2_1.pdf.

¹² CTR. ON BUDGET AND POL’Y PRIORITIES, CHART BOOK: SNAP HELPS STRUGGLING FAMILIES PUT FOOD ON THE TABLE (Feb. 14, 2018), <https://www.cbpp.org/research/food-assistance/chart-book-snap-helps-struggling-families-put-food-on-the-table>.

¹³ 7 U.S.C. § 2015(d) (2018).

¹⁴ 7 U.S.C. § 2015(o) (2018).

¹⁵ BOLEN, *supra* note 6, at 4.

It is already challenging for many unemployed or underemployed workers to meet SNAP's current time limits. Women are overrepresented in the low-wage workforce,¹⁶ which is plagued by unstable and unpredictable work schedules, nonstandard hours,¹⁷ part-time work,¹⁸ and few benefits like paid sick leave.¹⁹ And many child care providers do not provide care during non-standard hours.²⁰ In addition, discrimination and sexual harassment against women workers is pervasive across industries.²¹ One in three women who filed sexual harassment charges also

¹⁶ JASMINE TUCKER & KAYLA PATRICK, NAT'L WOMEN'S LAW CTR., LOW-WAGE JOBS ARE WOMEN'S JOBS: THE OVERREPRESENTATION OF WOMEN IN LOW-WAGE WORK 2 (Aug. 2017), available at <https://nwlc-ciw49tixgw5lbab.stackpathdns.com/wp-content/uploads/2017/08/Low-Wage-Jobs-are-Womens-Jobs.pdf>.

¹⁷ See generally JULIE VOGTMAN & JASMINE TUCKER, NAT'L WOMEN'S LAW CTR., COLLATERAL DAMAGE: SCHEDULING CHALLENGES FOR WORKERS IN LOW-WAGE JOBS AND THEIR CONSEQUENCES (April 2017), available at <https://nwlc-ciw49tixgw5lbab.stackpathdns.com/wp-content/uploads/2017/04/Collateral-Damage.pdf>.

¹⁸ In March 2018, 11.5 percent of women working part-time did so involuntarily. Nat'l Women's Law Ctr. calculations based on U.S. DEP'T OF LABOR, BUREAU OF LABOR STATISTICS, CURRENT POPULATION SURVEY, TABLE A-18 EMPLOYED AND UNEMPLOYED FULL- AND PART-TIME WORKERS BY AGE, SEX, RACE, AND HISPANIC OR LATINO ETHNICITY, available at <https://www.bls.gov/web/empsit/cpseee18.htm>. Involuntary part-time work is especially common in some low-wage sectors, such as retail work. DANIEL SCHNEIDER & KRISTEN HARKNETT, WASH. CTR. FOR EQUITABLE GROWTH, SCHEDULE INSTABILITY AND UNPREDICTABILITY AND WORKER AND FAMILY HEALTH AND WELLBEING 16 (Sept. 2016), available at <http://equitablegrowth.org/working-papers/schedule-instability-and-unpredictability/>. In addition, many who choose to work part-time voluntarily, especially women, choose to work part-time because they cannot access affordable child care. TUCKER & PATRICK, *supra* note 16, at 8.

¹⁹ KAYLA PATRICK, MEIKA BERLAN & MORGAN HARWOOD, LOW-WAGE JOBS HELD PRIMARILY BY WOMEN WILL GROW THE MOST OVER THE NEXT DECADE 2 (Aug 2018), available at <https://nwlc-ciw49tixgw5lbab.stackpathdns.com/wp-content/uploads/2016/04/Low-Wage-Jobs-Held-Primarily-by-Women-Will-Grow-the-Most-Over-the-Next-Decade-2018.pdf>.

²⁰ U.S. DEP'T OF HEALTH & HUMAN SERVS., ADMIN. FOR CHILDREN AND FAMILIES, OFFICE OF PLANNING, RESEARCH AND EVALUATION, PROVISION OF EARLY CARE AND EDUCATION DURING NON-STANDARD HOURS 2 (Apr. 2015), available at https://www.acf.hhs.gov/sites/default/files/opre/factsheet_nonstandard_hours_provision_of_early_care_toopre_041715_508.pdf.

²¹ See, e.g., REST. OPPORTUNITIES CTRS. UNITED & FORWARD TOGETHER, THE GLASS FLOOR: SEXUAL HARASSMENT IN THE RESTAURANT INDUSTRY 5 (2014), available at http://rocunited.org/wp-content/uploads/2014/10/REPORT_The-Glass-Floor-Sexual-Harassment-in-the-Restaurant-Industry2.pdf; HUMAN RIGHTS WATCH, CULTIVATING FEAR: THE VULNERABILITY OF IMMIGRANT FARMWORKERS IN THE US TO SEXUAL VIOLENCE AND SEXUAL HARASSMENT (May 2012), available at <https://www.hrw.org/report/2012/05/15/cultivating-fear/vulnerability-immigrant-farmworkers-us-sexual-violence-and-sexual> (documenting pervasive sexual harassment and violence among immigrant farmworker women); IRMA MORALES WAUGH, EXAMINING THE SEXUAL HARASSMENT EXPERIENCES OF MEXICAN IMMIGRANT FARMWORKING WOMEN, 16 VIOLENCE AGAINST WOMEN 237, 241 (Jan. 2010), available at <http://vaw.sagepub.com/content/16/3/237.abstract> (80 percent of female farmworkers in California's Central Valley reported experiencing some form of sexual harassment); UNITE HERE LOCAL 1, HANDS OFF, PANTS ON: SEXUAL HARASSMENT IN CHICAGO'S HOSPITALITY INDUSTRY (July 2016), available at <https://www.handsoffpantson.org/wp-content/uploads/HandsOffReportWeb.pdf> (58 percent of hotel workers and 77 percent of casino workers surveyed reported being sexually harassed by a guest); HART RESEARCH ASSOC., KEY FINDINGS FROM A SURVEY OF WOMEN FAST FOOD WORKERS (Oct. 5, 2016), available at <http://hartresearch.com/wp-content/uploads/2016/10/Fast-Food-Worker-Survey-Memo-10-5-16.pdf> (nationwide survey of workers in the fast food industry found nearly 40 percent of the women reported experiencing unwanted sexual behaviors on the job, and 21 percent of those workers reported that they suffered negative workplaces consequences after raising the harassment with their employer).

alleged retaliation,²² which can result in lost hours or job loss.²³ Furthermore, domestic violence survivors face challenges obtaining and maintaining employment because abusers may ruin the survivor's credit score and rental history, sabotage transportation and child care arrangements, and steal or control assets.²⁴

The Senate bill supports work by building on current SNAP work provisions and Employment and Training (E&T) demonstrations. In particular, it would add funding for and allow additional states to participate in SNAP E&T pilot programs that were implemented in the 2014 Farm Bill. This would enable greater opportunities to secure thorough evaluations and data regarding which approaches lead to jobs and better employment. In contrast, the House version would expand work requirements in ways that would further penalize women across the country who are trying to feed and care for their families and find quality work, such as by applying work requirements to people aged 50 to 59 years old and parents with children aged six and older. The House version also fails to provide adequate funding to ensure sufficient quality training slots for the millions who would be newly subject to the House bill's requirements. The conference committee should reject the punitive work requirements proposed by the House bill.

Continue to streamline and modernize SNAP operations.

The House bill contains several proposals that will increase paperwork requirements for families, who are struggling to feed their families and find quality work, and states, which will need to process the additional paperwork and track compliance with the expanded work requirements. Creating higher administrative burdens increases the chances that families struggling to feed their families will lose their access to SNAP.

For example, the House version proposes to eliminate a valuable connection between the Low-Income Home Energy Assistance Program (LIHEAP) and SNAP. LIHEAP helps an estimated 6.3 million households heat their homes.²⁵ Currently, states have the flexibility to use a Standard Utility Allowance for households receiving LIHEAP benefits, instead of requiring each of those households to provide documentation of their utility costs in order to receive the utility cost income deduction. This deduction helps families receive higher SNAP benefits, recognizing the

²² AMANDA ROSSIE, JASMINE TUCKER & KAYLA PATRICK, NAT'L WOMEN'S LAW CTR., OUT OF THE SHADOWS: AN ANALYSIS OF SEXUAL HARASSMENT CHARGES FILED BY WORKING WOMEN 5 (Aug. 2018), available at <https://nwlc-ciw49tixgw5lbab.stackpathdns.com/wp-content/uploads/2018/08/SexualHarassmentReport.pdf>.

²³ NAT'L WOMEN'S LAW CTR., SEXUAL HARASSMENT IN THE WORKPLACE (Nov. 2016), available at <https://nwlc-ciw49tixgw5lbab.stackpathdns.com/wp-content/uploads/2016/11/Sexual-Harassment-Fact-Sheet.pdf>.

²⁴ INSTITUTE FOR WOMEN'S POLICY RESEARCH, THE ECONOMIC COST OF INTIMATE PARTNER VIOLENCE, SEXUAL ASSAULT, AND STALKING (Aug. 2017), https://iwpr.org/wp-content/uploads/2017/08/B367_Economic-Impacts-of-IPV-08.14.17.pdf.

²⁵ DEP'T OF HEALTH & HUMAN SERVS., ADMIN. FOR CHILDREN & FAMILIES, LOW INCOME HOME ENERGY ASSISTANCE PROGRAM, REPORT TO CONGRESS 2014, at vi (Dec. 2016), available at https://www.acf.hhs.gov/sites/default/files/ocs/fy14_liheap_rtc_final.pdf.

need for families to heat their homes and eat. H.R. 2 proposes to eliminate this LIHEAP-SNAP connection for households without an elderly member, resulting in an extra burden upon those households to provide documentation for their utility cost before receiving a deduction. This will increase the paperwork burden for families struggling to make ends meet, lead to more paperwork for states to process, and cut SNAP benefits by an estimated \$5.3 billion over ten years.²⁶ The reauthorization should build on existing progress, and therefore the conference committee should reject these proposals.

In contrast, the Senate bill would continue to allow states to coordinate SNAP with low-income home energy assistance programs. The Senate bill also allows states to certify SNAP eligibility for certain elderly and disabled adults without earned income for up to 36 months. This is a sensible procedural improvement that will allow states to more seamlessly serve those vulnerable populations, which the conference committee should adopt.

The Conference Committee should reject the efforts in the House Farm Bill to prevent women and families from getting the food assistance they need, and instead endorse the bipartisan Senate Farm Bill’s SNAP provisions.

As a nation, we should fight hunger by helping families struggling to make ends meet and put food on the table. Expanding harsh work requirements, cutting SNAP benefits, and increasing paperwork burdens on states and families struggling to find quality work, put food on the table, and pay for other necessities will undermine, not increase, families’ economic self-sufficiency. We urge you to adopt proposals that strengthen and streamline SNAP, and reject the harmful proposals in the House version of the Farm Bill.

Sincerely,

State/Local Organizations

Mercy Brown Bag Program

Arizona

NACOG

Colorado

All Families Deserve A Chance Coalition

Colorado Center on Law and Policy

California

California Child Care Resource & Referral
Network

Connecticut

YWCA Hartford Region, Inc.

²⁶ Letter from Cong. Budget Off. to Rep. Michael Conaway, Table 2 – Details of Increases and Decreases in Direct Spending and Revenues of H.R. 2, the Agriculture and Nutrition Act of 2018, As Introduced on April 12, 2018 (Apr. 13, 2018), available at <https://www.cbo.gov/system/files/115th-congress-2017-2018/costestimate/hr2.pdf>.

Florida

Farmworker Association of Florida

Maryland

Maryland National Organization for Women
Montgomery County Community Action
Board
Public Justice Center

Massachusetts

YWCA Boston

Missouri

Empower Missouri

New York

Kids R Kids Feeding Program, Inc.

North Dakota

North Dakota Women's Network
United Way of Grand Forks, East Grand Forks
& Area

Ohio

YWCA Columbus

Pennsylvania

Pennsylvania Council of Churches
Women's Law Project

South Carolina

SC Appleseed Legal Justice Center

Texas

Texas These Are They

Utah

YWCA Utah

Vermont

Vermont Network Against Domestic & Sexual
Violence

Washington

YWCA Clark County

National Organizations

National Women's Law Center
National Resource Center on Domestic
Violence

A Better Balance
African American Health Alliance
American Association of People with
Disabilities
American Federation of State, County and
Municipal Employees (AFSCME)
American Psychological Association
Asian Pacific Institute on Gender-Based
Violence
Black Women's Roundtable
Center for Community Change Action
Center for Law and Social Policy (CLASP)
Center for American Progress
Center for Popular Democracy
Coalition on Human Needs
Daily Kos
Division for Early Childhood of the Council for
Exceptional Children (DEC)
Equal Rights Advocates
Every Child Matters
Family Values @ Work
Feminist Majority
Food Policy Action
Food Research & Action Center (FRAC)
Foster Adopt Connect

Friends of the Earth
Futures Without Violence
Hadassah, The Women's Zionist Organization
of America, Inc.
Hispanic Federation
Housing Works
Indivisible
International Brotherhood of Teamsters
League of Women Voters of the United States
MANA, A National Latina Organization
MAZON: A Jewish Response to Hunger
MomsRising
NAACP
National Association of Counsel for Children
National Center for Lesbian Rights
National Coalition for the Homeless
National Council of Jewish Women
National Crittenton
National Employment Law Project
National Institute for Reproductive Health
(NIRH)
National Latina Institute for Reproductive
Health
National LGBTQ Task Force Action Fund
National Low Income Housing Coalition
National Organization for Women
National Partnership for Women & Families
National WIC Association
National Women's Health Network
NETWORK Lobby
Oxfam America
PFLAG National
Polygon Education Fund
Racial and Ethnic Health Disparities Coalition
Raising Women's Voices for the Health Care
We Need
Sexuality Information and Education Council
of the United States (SIECUS)

Sisters of the Holy Cross
SparkAction
The Employee Rights Advocacy Institute For
Law & Policy
UltraViolet
Union for Reform Judaism
Voices for Progress
Women's Institute for a Secure Retirement
(WISER)
Women of Reform Judaism
YWCA USA