

The Honorable Pat Roberts
Chairman
Senate Committee on Agriculture, Nutrition, &
Forestry
U.S. Senate
328A Russell Senate Office Building
Washington, D.C. 20510

The Honorable K. Michael Conaway
Chairman
House Committee on Agriculture
U.S. House of Representatives
1301 Longworth House Office Building
Washington, D.C. 20515

The Honorable Debbie Stabenow
Ranking Member
Senate Committee on Agriculture, Nutrition, &
Forestry
U.S. Senate
328A Russell Senate Office Building
Washington, D.C. 20510

The Honorable Collin C. Peterson
Ranking Member
House Committee on Agriculture
U.S. House of Representatives
1301 Longworth House Office Building
Washington, D.C. 20515

Dear Chairman Roberts, Ranking Member Stabenow, Chairman Conaway, and Ranking Member Peterson:

During the deliberations of the Agriculture Improvement Act of 2018 (commonly known as the farm bill), the U.S. Conference of Mayors, including many of the undersigned bipartisan mayors, expressed serious concerns with various provisions being considered. In response, during our 86th Annual Meeting, three resolutions were adopted related to the Farm Bill: (1) Urging the Passage of a Farm Bill That Supports Healthy Food Access and Sustainable Food Systems; (2) Urging the Passage of a Farm Bill That Supports Healthy, Local, and Regional Food Systems; and (3) Protect SNAP and Federal Nutrition Programs in the 2018 Farm Bill.

As you begin conference negotiations, we urge you to remember that the Farm Bill has historically been bipartisan legislation and we encourage you to continue that legacy. The current iteration of the Senate bill does represent an improvement over the House measure as it works toward continuing that strong history of bipartisanship and we appreciate the Senate's recognition of many of the provisions important to our jurisdictions and the communities we serve. However, we reiterate our strong concern about proposals that move away from the best practices that have been developed over the last few decades in favor of implementing changes that have little to no empirical data to support them. Such programs will harm the much-needed programs that support the agricultural economy and the around 40 million people who need assistance buying their products. Below are areas of concern:

Expanded Work Requirements

Among the \$20 billion in cuts to the Supplemental Nutrition Assistance Program (SNAP) included in the House Farm Bill (H.R. 2) we are particularly concerned about around \$9.2 billion in cuts achieved by enacting harsher work requirements to unemployed and underemployed able bodied adults (18-59 years of age) without dependents or disabilities (ABAWDs). Unfortunately, Section 4015 of H.R. 2 requires ABAWDs to work or participate in an employment and training program (E&T) for a minimum 25 hours per week, and imposes a 12-month ineligibility period for the first violation, escalating to a 36-month ineligibility period for subsequent violations.

SNAP already has work requirements for ABAWDs - if an ABAWD is not employed, they must spend at least 20 hours per week in an E&T program. 25 hours is a 25% increase and will be most harmful to residents who face multiple barriers to employment, or who live in communities with high unemployment or a lack of job opportunities. In cities in particular, there is oftentimes severe competition for job placements, particularly in today's full employment economy.

To facilitate these work requirements H.R. 2 authorizes a five-year investment of \$3.34 billion in federal funding for E&T. It is estimated that nearly 3.5 million SNAP participants would need to participate in an E&T program to continue to be eligible for SNAP benefits. Eligible providers are already raising flags that they will not be able to build the necessary capacity in the two years as mandated by the House, and that the allocated funds will only be able to cover the most basic services. Research suggests that mandatory work requirements would do little to increase employment, and on the practical front, thirty states and Washington, DC have shifted from a mandatory E&T program to a voluntary program because the costs outweigh the benefits. These mandatory work programs constitute burdensome costs and in their current form, essentially equate to an unfunded mandate.

During conference, we urge you to walk away from the very harmful changes that are contained in H.R. 2 and consider the E&T modifications found in S.3042, which would encourage the implementation of effective strategies developed by the pilots authorized in the 2014 Farm Bill. These pilot programs are currently sunseting and have not yet fully reported their best practices. Forging ahead without considering the pilot programs' insights defeats its original purpose and is wasteful and unprincipled. We also encourage the committee to fund the additional eight state pilot projects, proposed by the Senate bill, which would focus on SNAP recipients who have problems finding employment and language that would make it easier for state agencies to work with the private sector in training SNAP recipients for jobs. We believe this pilot program would help families exit the cycle of poverty, a key goal of safety net programs.

Both the House (Sec. 4001) and Senate (Sec. 4109) bills have provisions for a database that will ensure individuals are not receiving benefits from multiple jurisdictions; and we believe that is a valid and important step towards program integrity and protecting taxpayer dollars. We are also supportive of the 10 pilot programs outlined in Section 4107 of S. 3042 that would allow eight states to test alternative methods of verifying income eligibility, such as income tax / W2 data. Administrative burden on both the individual and the verifying state agency is often a barrier to accessing benefits and a limiting factor on data integrity.

Eliminating Broad Based Categorical Eligibility and changing ABAWD Waivers

The House is projecting that \$5 billion can be saved by eliminating the state-level broad-based categorical eligibility (BBCE), which 40 states, the District of Columbia and Virgin Islands utilize to determine SNAP eligibility. The overwhelming popularity of this program makes it clear that BBCE alleviates a significant administrative burden and helps ensure that low-income families can access SNAP. The proposed changes would be particularly damaging to low-income working individuals with children, the exact population both Democrats and Republicans can agree should be the ones benefitting from the program. Cost savings should not be incurred by depriving benefits from those who need it most.

The House bill also proposes to change the way that ABAWD time limit waivers are determined by changing the way geographic areas are combined to estimate a region's unemployment rate. These waivers recognize that ABAWDs who reside in an area that has high unemployment rates may be unable to find employment within the time limits as defined by law. Additionally, as outlined in the previous section, jurisdictions will most likely be unprepared to provide training and employment services to everyone eligible for SNAP. That burden will be particularly acute in the jurisdictions that currently utilize an ABAWD waiver as there would be a sudden influx of individuals who would be required to participate in E&T or lose access to the program. Only 17 states do not utilize an ABAWD waiver so this change will affect large swathes of the United States. Changes to the ABAWD waiver process would only further harm communities that are already dealing with higher than average rates of unemployment and underemployment.

LIHEAP- SNAP Utility Allowance

Section 4011 of H.R. 2 seeks to save \$5.3 billion by removing the automatic availability of the Standard Utility Allowance (SUA) to recipients of energy assistance who are also on SNAP. Many states and Washington, DC have

chosen to use SUA for consistency, ease of administration and ease of programming. Under the House's plan, recipients would have to provide actual utility bills for each expense in order to receive Low Income Home Energy Assistance Program (LIHEAP). This change is yet another unnecessary burden on individuals and families who are facing the choice between heating their home and eating and reduces pathways to the middle class.

Support for Regional and Local Food Systems; Food Insecurity Programs

We support the provisions in Section 10102 of the Senate bill to support the development of partnerships for local and regional food systems. Furthering these systems could help alleviate the billions of dollars the U.S. spends every year to treat diet-related chronic illness. We are glad to see that both versions of the farm bill include support for the Emergency Food Assistance Program and the Gus Schumacher Food Insecurity Nutrition Incentive Program. Furthermore, we support the House provision that would establish a Farm-to-Food Bank fund and the Senate provision that would provide for classify the Gus Schumacher Food Insecurity Nutrition Incentive Program as mandatory funding.

Electronic Benefit Transfer Cards/System

We support the provisions in Section 4104 of S. 3042, which would improve the electronic benefit transfer system, particularly as it pertains to allowing farmers markets to operate multiple point of sale devices under the same supplemental nutrition assistance retailer authorization, and an examination of EBT outages and ways to limit those moving forward.

We are however, deeply concerned by the provision found in Section 4019 of the House bill which would limit the number of allowable annual EBT card replacements to 2 cards per year. In particular, the requirement of a face-to-face meeting with state agency personnel if more than two cards are lost could negatively affect SNAP recipients who work multiple jobs or maintain non-standard work schedules as recipients may need to take unpaid leave to avoid sanctions.

In sum, we write today to express our continued strong opposition to any and all provisions in the Agriculture Improvement Act of 2018 that would unnecessarily impede families and individuals from accessing healthy food options and exiting the cycle of poverty. Even though we are mayors of urban centers, we intrinsically understand the importance of the food and agriculture industry and recognize that improving the resiliency and strength of our farming communities should be at the forefront of this year's Farm Bill deliberations. The overhaul of SNAP as outlined in the House bill has zero democratic support, and is merely a distraction from the necessary and important work of investing in our food markets and ecosystems, as well as measures aimed to reduce fraud and expand job training pilot programs. With the Farm Bill expiring shortly, on September 30, 2018, we encourage all of you to work towards a bipartisan solution that will best serve the American people. It is possible to encourage self-sufficiency in a supportive manner, instead of a punitive one.

Sincerely,