



National Patient
Advocate Foundation

April 2, 2019

Certification Policy Branch
SNAP Program Development Division
Food and Nutrition Service, USDA
3101 Park Center Drive
Alexandria, Virginia 22302

Submitted via [regulations.gov](https://www.regulations.gov)

RE: Proposed Rule: Supplemental Nutrition Assistance Program (SNAP): Requirements for Able-Bodied Adults without Dependents RIN 0584-AE57

Dear Certification Policy Branch:

National Patient Advocate Foundation (NPAF) would like to express our concern with the Administration's proposed rule that would make it harder for individuals to access food through the Supplemental Nutrition Assistance Program (SNAP). NPAF supports policies that preserve safety net services and supports, like SNAP, that help people avoid household material hardships such as food, energy and housing insecurity. We are deeply concerned that the proposed changes tied to work requirements would cause more harm to vulnerable patients and families, which may lead to negative health consequences and further financial distress.

NPAF represents the voices of millions of adults, children and families coping with serious and chronic illnesses as the advocacy affiliate of Patient Advocate Foundation (PAF). PAF provides direct case management, financial support, and educational services to tens of thousands of primarily low-income patients and caregivers nationwide each year who are experiencing distressing financial, employment, insurance coverage or household material hardships because of their health conditions. In 2017, PAF served as an important safety net to over 100,000 patients and families across the country.

Many people turn to safety net services and supports because they face significant health or family challenges that may limit their ability to work or reduce their ability to compete for a limited supply of jobs. Almost one-third (30 percent) of patients who contacted PAF in 2018 for assistance were confronting debt crises that impaired their ability to afford transportation expenses, housing, utilities, or nutritional needs.¹ In a 2017 PAF survey, 83 percent of the respondents indicated they sought assistance from government safety net programs to address such household material hardships and 90 percent sought assistance from private or charitable organizations for similar reasons.²

Limiting access to nutrition assistance could be particularly harmful for low-income people with serious or chronic illnesses, such as cancer, hypertension or diabetes, who may also have trouble maintaining their health while keeping a job. Taking access to nutrition assistance away from people with serious illnesses could negatively affect their health, which could make it even more difficult for them to maintain employment. While the proposed rule would not apply to low-income parents, the elderly or disabled adults on supplemental security income or social security disability income, many of the individuals that may be affected are family caregivers caring for ill parents, siblings or extended family

¹ Patient Advocate Foundation. Internal Case Management Data. 2018.

² Patient Advocate Foundation. Internal Data. 2017 Safety-Net Survey.

members—those who otherwise could not be claimed as dependents.³ By the Department’s own calculations, the rule would impact 755,000 low-income individuals over the next three years.

We urge you to please reconsider the proposed changes to SNAP. Safety net services and supports like SNAP are critical to addressing health inequities. The proposed rule will only result in more hardships for thousands of struggling individuals either coping or caring for someone with a serious or chronic illness.

Respectfully submitted,

A handwritten signature in black ink that reads "Rebecca A. Kirch". The signature is written in a cursive, flowing style.

Rebecca A. Kirch
Executive Vice President, Health Care Quality and Value

³ Program Integrity for the Supplemental Nutrition Assistance Program, 9 May 2018. <https://www.cbpp.org/food-assistance/program-integrity-for-the-supplemental-nutrition-assistance-program>