March 23, 2020

Secretary Sonny Perdue  
U.S. Department of Agriculture  
1400 Independence Ave., S.W.  
Washington, DC 20250

Pam Miller, Administrator  
Food & Nutrition Service  
Braddock Metro Center II  
1320 Braddock Place  
Alexandria, VA 22314

Dear Secretary Purdue and Administrator Miller:

We urge you and the Food Nutrition Services to afford maximum flexibility to the states in providing benefits under the Supplemental Nutrition Assistance Program (SNAP) to increase the tools the states have to ensure the maximum access to nutrition benefits. We also ask FNS to withdraw, or at least suspend, pending proposed changes which would restrict access to SNAP benefits. This is not the time to further restrict the states’ ability to respond nimbly to the developing health and economic emergency.

SNAP RECIPIENTS NEED TO BE ABLE TO DO ON-LINE SHOPPING

As a first matter, we urge you to provide greater flexibility to access and use SNAP benefits through electronic means. As our federal and state leaders encourage social distancing and state governments shut down businesses and limit access to public transit, it is becoming more difficult for SNAP beneficiaries to access grocery stores to purchase food. On-line shopping would allow individuals restricted from leaving their home due to sickness or quarantine and those located in food deserts and unable to travel to a grocery store access to the food they need. Neighboring states currently participating in the pilot program report that it works quite well and has a much lower incidence of misuse. We recommend that the current pilot with using SNAP benefits to purchase food on-line be expanded nationwide.

APPROVE CONNECTICUT'S WAIVER REQUEST FOR STUDENT EMPLOYMENT AND TRAINING

We ask you to approve Connecticut’s waiver request regarding student employment. Currently, college students, like other adults, must work 20 hours a week in order to qualify for benefits unless they fall other another exemption. As a college education is currently essential in finding a well-paying job in the U.S. economy of the 21st century, pursuit of a college degree should be included in employment and training activity. Current state efforts to make community college available and affordable for all qualified applicants is
dramatically undercut by SNAP work requirements. In the current emergency, this is even more so as student employees will be the first to be let go as campuses close and the sort of hourly work that allows a student to attend classes is in diminished supply with the closure of retail stores and restaurants. Without removing this requirement, students will have no other way to feed themselves. Moreover, as campuses are closed and some students return to their families, those families will now have an additional mouth to feed on their existing benefits. Also, any work a student is able to do would be counted against the family’s total income, potentially resulting in diminished benefits while the student is home, unless the work requirement is exempt.

STATES NEED TO BE ABLE TO ADDRESS RAPIDLY INCREASING UNEMPLOYMENT AND THE LOSS OF JOBS

FNS must cease current efforts to restrict states’ ability to address local changing economic conditions. FNS’s proposed rule changes regarding categorical eligibility and the standard utility allowance and the recently enacted change to the rule regarding able-bodied adults without dependents limit states’ ability to rapidly address the quickly devolving economic situation for their residents. Needless “standardizing” states’ treatment of the very local issues of job markets and utility use, among other things, is contrary to the basic purpose of the SNAP program—to provide states a flexible tool to address the nutrition needs of people experiencing temporary hardship – and counterproductive to efforts to keep people healthy in a time of crisis.

The final ABAWD rule is particularly problematic for states seeking to get SNAP benefits out quickly to the newly unemployed. Connecticut saw applications for unemployment compensation soar last week, from a normal average of 2,000 to over 72,000. On Friday, March 20, 2020, Connecticut had its highest single day filing of unemployment compensation applications. Many of these are from employees in low-paying service economy jobs as restaurants, stores, and other businesses that directly serve the public have been forced to close. It is more than likely that the state will see unemployment rates well in excess of ten percent; however, the time period over which such an increase must occur and be maintained before the new rules would allow Connecticut to distribute benefits broadly will mean that most ABAWDs impacted by this crisis will be unable to access benefits for over twelve months at the earliest. People need help now, and the states need the flexibility to provide that help as soon as possible.

We ask that you refrain from appealing the decision of the U.S. District Court for the District of the District of Columbia, and that you withdraw the proposed rules changes related to the categorical eligibility and standard utility allowance.

Sincerely,

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