



August 20, 2018

Dear Farm Bill Conferees:

As you reconcile the differences between the House's *Agriculture and Nutrition Act* (H.R. 2) and the Senate's bipartisan *Agriculture Improvement Act* (S. 3042), the National Association of County Human Services Administrators (NACHSA) wishes to convey its views on the Supplemental Nutrition Assistance Program (SNAP) provisions contained in the measures. In brief, NACHSA supports the Senate provisions and urges the House to recede to the Senate on those matters. Our specific positions are found below.

An affiliate of the National Association of Counties (NACo), NACHSA represents directors of county human services programs across the country. In ten of those states, NACHSA members administer (and their county government assists in financing) the SNAP program on behalf of the state. Nearly one-third of all SNAP recipients nationwide reside in these county-administered states.

### **Senate Provisions**

NACHSA supports the Senate's *Agriculture Improvement Act's* SNAP provisions. The bill protects SNAP eligibility and benefits. It also improves the program in the following ways.

**Reducing Barriers for Older Persons and Individuals with Disabilities:** NACHSA supports Section 4101 providing states with the option to extend the amount of time -- from two years to three years -- before an adult age 60 or older or a person with a disability with no earned income since the last review has to be re-certified as eligible for SNAP. This state option to further streamline the process helps ensure that eligible households will continue to receive uninterrupted benefits. Additionally, the option will reduce county administrative costs in determining eligibility for that segment of the population.

**Promoting Work and Training:** NACHSA supports employment and training (E&T) programs to assist individuals in helping them move to economic independence. Section 4103 helps accomplish that goal. The provision gives states and counties the ability to expand the types of activities allowed in SNAP E&T programs. NACHSA also welcomes the investment of \$185 million for new competitive state grants to launch pilot projects for E&T initiatives.

### **House Provisions**

NACHSA sent a letter to the House on May 11, 2018 opposing numerous SNAP provisions contained in H.R. 2. We continue to oppose them. SNAP is essential to reducing food insecurity. The House bill would make it more difficult for individuals and families to qualify for SNAP and remain on the program if they do not meet stringent work requirements every month. Additionally, county agencies would have far less administrative flexibility to determine eligibility. Those new processes will not only make it more difficult to gather the new documentation necessary from SNAP-eligible families, but will also serve to reduce caseloads due to the new paperwork requirements placed on counties and households alike.

While NACHSA supports county agencies' work to move families into economic independence, the bill's increased work requirements and the funding of SNAP E&T programs ignores the fact that most households use SNAP as a temporary bridge during times of financial stress. Requiring counties and states to track work participation for millions of new individuals, and/or provide all of them with E&T services is highly unlikely to be cost-effective.

### **Conclusion**

The House and Senate bills are reconciled, NACHSA urges the conferees to adopt the SNAP provisions in the bipartisan Senate measure. The Senate improves upon the foundation of SNAP while the House bill increases food insecurity and increases county administrative complexity.

Sincerely,



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