



June 9, 2023

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Committee on Agriculture  
U.S. House of Representatives  
Washington, D.C. 20515

Dear Representative:

On behalf of the 1.4 million members of the American Federation of State, County and Municipal Employees (AFSCME) and our members who administer benefits of the Supplemental Nutrition Assistance Program (SNAP), I urge you to support and strengthen the structure, integrity and capacity of SNAP as you develop the Farm Bill.

SNAP is a powerful and successful tool to ensure that all Americans can afford healthy food – it is a lifeline for 41 million Americans including students, veterans, disabled Americans, children, families and seniors. We note it is a safety net nutrition program, not an employment program. SNAP has been an effective tool to combat hunger, poverty and improve economic conditions for both individuals and communities. In communities, it serves as an economic engine, generating between \$1.50 and \$1.80 for every dollar invested.

Beginning in March 2020, states and counties used temporary SNAP flexibility to provide emergency benefit supplements, maintain benefits to households with children missing school meals, and ease program administration during the pandemic. These options allowed states to deliver more food assistance to struggling families, helped manage intense administrative demands, and ensured that participants maintained much-needed benefits all while radically shifting their operations to respond to a public health emergency. In fiscal year (FY) 2021, SNAP participation averaged 41.5 million beneficiaries, up by nearly 5.8 million over the pre-pandemic year FY 2019.<sup>1</sup>

With these factors in mind, AFSCME recommends the following to strengthen SNAP:

**Ensure access to full SNAP benefits by preserving the merit-staffing requirement for eligibility determination.**

AFSCME members who are SNAP state and county eligibility workers help constituents access nutrition benefits. Federal law requires that “merit staff” public employees conduct the essential work of SNAP to screen for eligibility and determine benefit levels. This includes providing application assistance, answering client questions about missing information, pursuing missing information, and providing verification guidance. Merit staff are civil service government workers who act as honest brokers to deliver benefits and services professionally, efficiently and effectively. Merit systems at the

<sup>1</sup> <https://frac.org/blog/new-data-snap-benefit-redemptions>

federal, state and local levels require hiring, advancement, demotion and discipline based on merit and competence. Merit staff conduct the people's business according to transparent standards, free from political influence and without fear of arbitrary management action or retaliation. Merit-based personnel systems are resilient and can help safeguard decisions to grant or deny an important nutrition federal benefit from political whims.

Merit staffing ensures that SNAP beneficiaries receive the help they need from a skilled professional workforce, that recipient data remains private, and that eligibility determinations are based on qualifications rather than profit or other motives.

**AFSCME strongly opposes allowing states to expand non-merit staff for SNAP administration, including allowing states to contract out staffing to record or accept client information, conduct interviews and handle client complaints regarding case eligibility and benefits.** Congress should not permit states to hire non-merit staff to screen for eligibility, provide application assistance, answer client questions about missing information, pursue missing information, and provide verification guidance. We oppose permanent, expanded changes such as those proposed in the Emergency SNAP Staffing Flexibility Act of 2021 (H.R. 6203) because it would decimate merit-staffing requirements, undermine program integrity and waste limited taxpayer resources.

Experiments with the outsourcing of merit-staffed work in Texas and Indiana proved to be a waste of taxpayer dollars and a drain on good, local jobs that pay better than privateers who rarely provide essential benefits, including health care and retirement.<sup>2</sup> Outsourcing has resulted in none of the promises of improved performance, efficiency or cost savings. In fact, it has harmed struggling families, seniors and the disabled, and compromised the integrity of the program itself. As Stacy Dean, Deputy Undersecretary for Food, Nutrition and Consumer Services, United States Department of Agriculture (USDA), noted in testimony before the House Agriculture Committee's hearing in 2022, these harmful impacts were "disastrous and ended up making service worse and states had to pull back from it. So experience would suggest it's a pretty risky endeavor to shift the roles as we've experienced them for the past four decades."

### **Increase necessary administrative funds.**

It is essential that SNAP has adequate program staff to determine eligibility in a timely manner so that families can access the nutrition assistance they need. In April 2023, the impact of the pandemic on the state and local government workforce remained acute, with states and towns struggling to fill 833,000 open positions. In addition, many merit staff who make SNAP eligibility decisions also work on Medicaid eligibility

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<sup>2</sup> Center for Public Policy Priorities, "Updating and Outsourcing Enrollment in Public Benefits: The Texas Experience," November 2006, [http://library.cppp.org/files/3/CP PP\\_PrivReport\\_\(FS\).pdf](http://library.cppp.org/files/3/CP PP_PrivReport_(FS).pdf); Center for Public Policy Priorities, "News Release: New Report on Texas' Troubled Outsourcing Experiment Tells Cautionary Tale for Sister States," November 13, 2006, [http://library.cppp.org/files/3/privatizationrelease\\_CH.pdf](http://library.cppp.org/files/3/privatizationrelease_CH.pdf); David Super, "Indiana Court Autopsies Welfare Privatization Effort," *Balkinization*, August 3, 2012, <https://balkin.blogspot.com/2012/08/indiana-court-autopsies-welfare.html>; Matea Gold, Melanie Mason, and Tom Hamburger, "Indiana's Bumpy Road to Privatization," *Los Angeles Times*, June 24, 2011, <http://articles.latimes.com/2011/jun/24/nation/la-na-indiana-privatize-20110624>.

determinations. The unwinding from the public health emergency resulted in an unprecedented increase in workload responsibilities and warrants additional workforce training and resources. **AFSCME recommends increasing the administrative match for SNAP from 50% to 75%. This increase will help pay competitive wages, provide adequate training and support workers to prevent backlogs, and improve consumers' access to needed benefits.**

**Allow administrative flexibilities, not outsourcing, to improve efficiency.**

During the pandemic flexibilities that improved the consumer experience included easing interview requirements, streamlining methods for electronic signatures, extending certification periods and simplifying reporting requirements. These should be allowed to continue. ***Administrative flexibility is not privatization or outsourcing.*** We oppose proposals to waive merit staffing, for example, during pandemics and other health emergencies, seasonal workforce cycles, temporary staffing shortages, and weather or other natural disasters. Given the current staffing shortage, the focus should be on strengthening the program in a sustainable way that upholds its integrity and access.

SNAP is a countercyclical program designed to respond to periods of high demand and adjust when demand wanes. As such, program administration should also be designed to accommodate these cycles.

**Extend SNAP's entitlement structure to Puerto Rico and other U.S. Territories.**

U.S. Territories, including Puerto Rico, receive a capped block grant from the Nutritional Assistance Program (NAP). This structure is unlike SNAP and the program is not able to serve all eligible people who apply. Other major federal nutrition programs — including the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) and child nutrition programs including school meals programs — operate the same in Puerto Rico as in the states. We urge you to provide the U.S. citizens in Puerto Rico with full access to the SNAP program and not the block grant under NAP.

**Summary**

Thank you for your efforts to continue to ensure that SNAP meets the needs of those in need and is administered by professional, merit-staffed state and county employees. We are counting on you to maintain current SNAP merit-staffing requirements to fully enable the program's ability to serve our nation's most vulnerable families.

Sincerely,



Edwin S. Jayne  
Director of Federal Government Affairs