April \_, 2018

Ms. Sasha Gersten-Paal

SNAP Program Development Division

Food and Nutrition Service

3101 Park Center Drive

Room 812

Alexandria, VA 22302

Re:  Advanced Notice of Proposed Rulemaking:  Supplemental Nutrition Assistance Program:  Requirements and Services for Able-Bodied Adults Without Dependents RIN 0584–AE57/Impact of Work Requirements on People with Criminal Records

Dear Ms. Gersten-Paal:

I understand that the U.S. Department of Agriculture is considering changing the rules so that even in areas of high unemployment, low income people without children and who are not considered disabled would be permitted to receive SNAP for only 3 out of 36 months, unless they were working 20 hours per week. On behalf of my organization, I am writing to oppose such a change to the SNAP work requirements, because it would be devastating to people with criminal records.

My organization regularly works with people with criminal records. **[Insert description.]** ***From our daily work with this population, we know that many, if not most, of our clients with criminal records would not be able to meet the 20 hour work requirement, and that the loss of SNAP would case immense hardship to them.***

People reentering the community after release from incarceration would be very unlikely to meet the work requirements. This population has extremely high unemployment rates. Even a year after release, 60% remain unemployed. Given that almost 10 million people per year are released from jails and prisons, the numbers of reentering people likely to lose SNAP because of inability to meet the work requirements are staggering.

People with criminal records who are not returning from incarceration also would be hurt. They too face stubbornly high unemployment rates throughout their lives, even for old and minor records. Penalizing them for not working 20 hours per week when so many of them want to do exactly that but are unable to find jobs would be harsh and unfair.

In our experience, SNAP plays a vital role for many people with criminal records. They do not qualify for cash assistance, unless they have been found disabled or perhaps if they have custody of children. SNAP is the only resource that allows them to buy food, although at a maximum benefit of $192 for a single person, it is a very modest one.

A rule that has the effect of depriving people with criminal records from receiving SNAP would have negative implications for reentry, at a time when there is bipartisan support for helping people with records reintegrate in our communities. A loss of SNAP surely would increase recidivism from people who are trying hard to rebuild their lives.

We strongly urge that no changes be made to the SNAP work requirements. Thank you for considering my comments.

 Very truly yours,

 YOUR NAME HERE