



**House Bill 200
Opponent Testimony**

Gary Dougherty
Director, State Government Affairs and Advocacy
American Diabetes Association
House Health Committee – June 4, 2019

Chairman Merrin, Vice Chair Manning, Ranking Member Boyd, and Members of the Committee:

My name is Gary Dougherty and I am the Director of State Government Affairs and Advocacy for the American Diabetes Association.

On behalf of the more than 4.3 million Ohioans with or at risk of developing diabetes, I urge you to oppose HB 200.

The Supplemental Nutrition Assistance Program (SNAP) provides a modest level of nutritional support to individuals and families, averaging only \$125.25 per person per month in Fiscal Year 2018.¹

In Ohio, SNAP already has work requirements. Participation in a SNAP Education and Training program is mandatory for many SNAP beneficiaries. However, as implemented, the value of SNAP Education and Training programs is questionable. A USDA-sponsored study found that these programs did not build skills needed for occupations in high-demand in their localities and that participants often needed significantly greater soft skills to become employable.²

A 1996 federal law further limits SNAP eligibility for childless unemployed and underemployed adults aged 18-49 (with some exemptions) to just three months out of every three years unless they are able to obtain, maintain, and document at least 80 hours of employment or work activity each month. This population is typically defined as Able-Bodied Adults without Dependents (ABAWDs).

Since the enactment of that time limit, however, states have utilized certain flexibilities in the statute to ameliorate its impact. States can request a waiver of the time limit for areas within the state that have 10 percent or higher unemployment rates or, based on other economic

¹ USDA Food and Nutrition Service. Program Information Report (Key Data): U.S. Summary - FY2018-FY2019. Available at <https://fns-prod.azureedge.net/sites/default/files/datastatistics/keydata-december-2018.pdf>

² <https://fns-prod.azureedge.net/sites/default/files/ops/SNAPeandTCharacteristics.pdf>

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indicators, have “insufficient jobs.” In a recent Notice of Proposed Rule Making (NPRM), USDA proposed to further restrict states’ flexibility to employ area waivers and other exemptions, in a change that, by the Department’s own estimates, would reduce the number of SNAP enrollees by 755,000 nationally in 2020.

Currently, Ohio is relying on area waivers of the 90-day time limits in 39 counties.³ SNAP enrollees in these counties are still required to participate in SNAP Education and Training programs to keep their benefits; they just are not subject to the 80 hours/month requirement.

Rather than wait on the federal rulemaking process, HB 200 would bar the Ohio Department of Job and Family Services from pursuing area waivers. Because the proposed federal regulation would only restrict, not end, such waivers, the bill’s impact would be even greater than that associated with the proposed federal restriction.

The application of work requirements in SNAP and TANF have not offered a path to economic self-sufficiency, their often-stated rationale. An Urban Institute analysis concludes

The evidence shows work requirements fail to achieve their goal for two primary reasons:

Work requirements don’t necessarily help people find jobs, and certainly not jobs that lift people out of poverty.

The red tape associated with work requirements can cause people to lose access to vital supports even when they are working or should be exempt from the requirements.⁴

By contrast, SNAP is effective in combatting household food insecurity.^{5 6 7} So, for the American Diabetes Association, the bottom line is that the expanded SNAP time limits and extension of SNAP Education and Training requirements are likely to reduce food security.

Healthy eating is essential to both diabetes prevention and treatment. A healthy diet is a key factor in preventing the onset of type 2 diabetes, even in individuals at high risk. For many

³ <https://radio.wosu.org/post/ohio-expands-snap-work-requirement-exemptions-covering-more-black-residents>

⁴ https://www.urban.org/sites/default/files/publication/98086/work_requirements_in_safety_net_programs_0.pdf

⁵ Nord M, Prell M. Food security improved following the 2009 ARRA increase in SNAP benefits. Economic Research Report, 116. U.S. Department of Agriculture, Economic Research Service, 2011.

⁶ Mabli J, Ohls J. Supplemental Nutrition Assistance Program participation is associated with an increase in household food security in a national evaluation. *Journal of Nutrition* 2015;145(2), 344–351.

⁷ Ratcliffe C, McKernan SM & Zhang, S. How much does the Supplemental Nutrition Assistance Program reduce food insecurity? *American Journal of Agricultural Economics* 2011;93(4), 1082–1098.

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individuals with diabetes, or those at high risk of the disease, the most challenging part of treatment is determining what to eat and adhering to an eating plan.

Yet that challenge is even greater when people with or at risk of diabetes face food insecurity, a condition defined by limited or uncertain access to adequate food at some point during the year.

SNAP has repeatedly been shown to be effective at reducing food insecurity. This effectiveness persists despite the quite modest levels of monthly nutritional support available through SNAP. SNAP restrictions can be expected to increase diabetes risk in the affected population, lead to more Ohioans with diabetes, and worsen outcomes for those already living with the disease.

The American Diabetes Association supports improving SNAP and other nutrition programs, but HB 200 would undermine these already ongoing reform initiatives. Although the proposed restrictions are often framed as impacting non-disabled adults only, they will affect children with serious consequences for diabetes risk through the lifespan of the next generation of Ohioans.

For these reasons, the American Diabetes Association strongly opposes HB 200 and urges you to do the same.

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