

Senate Bill 17 Opponent Testimony
Senate Government Oversight and Reform Committee
February 24, 2021

Chairwoman Roegner, Vice Chairman McColley, Ranking Member Craig, and Members of the Senate Government Oversight and Reform Committee, thank you for the opportunity to testify today on Senate Bill 17. My name is Rachel Cahill and I am here today on behalf of the Social Action Commission for Saint Paschal Baylon Catholic Church in Highland Heights. I am the current Chair of the Social Action Commission and a mother of three young children who attend Saint Paschal Baylon Catholic School. I also happen to work as a consultant for non-profit organizations and state agencies due to my expertise in the Supplemental Nutrition Assistance Program (SNAP). For the last 15 years, I have been advocating for strong federal nutrition programs, including SNAP, to keep my neighbors from going hungry, first in Pennsylvania and now in Ohio. For me, this professional calling is inextricably linked to my faith and my lifelong education in Catholic Social Teaching.

Last week my family began our Lenten practice of scripture reading with the Gospel of Matthew, Chapter 25: 35: *“For I was hungry and you gave me food, I was thirsty and you gave me drink, I was a stranger and you welcomed me.”* In this beloved passage, Jesus makes clear that we will be judged not by how we treat those we love and respect, but how we treat those who are struggling to survive. And it is food and drink that Jesus holds up as the essentials of life that we must provide for one another.

I am here to testify against Senate Bill 17 because it would undeniably take “food and drink” away from Ohioans who are struggling to survive, especially children, senior citizens, and working people. Senate Bill 17 does this by throwing up a litany of barriers to prevent *eligible* Ohioans from accessing the federally-funded nutritional assistance they need to supplement their meager incomes. Passing such a bill in the midst of a pandemic that has resulted in child hunger rates 10 times higher than they were one year ago is indefensible and inconsistent with the U.S. Conference of Catholic Bishops’ call to lawmakers during this pandemic to *“promote the dignity and value of all human life and protect poor and vulnerable people who are most at risk.”*^{1,2} It would also be fiscally foolish, as it will be very expensive to implement and will undoubtedly set back Ohio’s economic recovery.

Before getting into specific aspects of Senate Bill 17 that will increase hunger in Ohio, I want to ensure all members of this distinguished committee have a clear understanding of what struggling Ohioans *already* endure to access SNAP benefits, in case you have never been in the unfortunate position of having to apply for yourself.

¹ December 2020 data, gleaned from U.S. Census Bureau’s Pulse Survey. See <https://www.cbpp.org/children-not-getting-enough-to-eat-more-than-10-times-higher-in-december-2020-than-a-year-before>

² Bishop Chairmen Express Support for Additional COVID-Relief Package, Lay Out Priorities to Help Those Most in Need, February 3, 2021. See <https://www.usccb.org/news/2021/bishop-chairmen-express-support-additional-covid-relief-package-lay-out-priorities-help>.

- To apply for SNAP, families must complete an application that asks for detailed information about every member of the household, including relationships, employment status and earnings, shelter expenses, like rent and utility bills, as well as childcare and medical expenses. Every piece of information must be verified with things like social security cards, paystubs, utility and child care bills, and medical expense receipts. Attached to my written testimony is a long list of documents required to be provided at the time of application.³ Families applying for SNAP must also complete an interview with a caseworker who reviews all of this information and can ask for additional information if they finding anything to be “questionable.” The responsibility to complete this interview within 30 days is entirely on the applicant, even if wait times to reach a caseworker are hours long, every day of the week.
- The initial application process is so onerous that the Greater Cleveland Food Bank reports that less than half of families that they pre-screened as eligible and help apply actually get approved. Think about that. We already have an application process that is so onerous, most eligible people simply cannot make it through, even with help from well-trained staff at a food bank.
- For those Ohioans who do manage to make it through this gauntlet of application barriers, Ohio generally requires them to comply with “interim reporting requirements” 6 months after initial enrollment, which requires turning in more paperwork and re-verifying their income. Then at 12 months we ask them to reapply all over again. This requires re-submitting an application and all verification documents and completing yet another interview. This process is so onerous that at least 30% of all households aren’t able to complete it successfully, despite continued eligibility. And this was *before* adding all of the barriers presented by the pandemic.
- Now think about all of the ways that this process has gotten *even harder* for struggling families during the pandemic –
 - Mail has been extremely delayed, meaning renewal forms and interview notices often arrive well after deadlines have passed and applications have been denied.
 - JFS offices and libraries are still closed in parts of the state, leaving few options for submitting required documents for those without a computer, copier and scanner at home
 - Call Centers have been jammed from increased applications from those who have lost their jobs, and those desperate to make sure their SNAP cases get renewed so benefits aren’t cut off. So, it can be nearly impossible to reach a caseworker to complete a required interview.
- **Families go through all of this for less than \$4 per person/day in SNAP benefits that can only be used to purchase groceries.⁴**

³ Available at <http://www.odjfs.state.oh.us/forms/num/JFS07104/pdf/>

⁴ See U.S. Department of Agriculture, Food and Nutrition Service SNAP Household Characteristics, FY 2018. <https://snapvisualizations.net/SNAP-household-state-averages#>

I share all of this because it is critically important that Ohio’s lawmakers understand that applying for and renewing SNAP benefits is already a rigorous and often demoralizing process that keeps out many needy Ohioans. And Senate Bill 17 would make these problems exponentially worse. Here’s how:

1. **Senate Bill 17 would make Ohio the only state in the nation to use “Change Reporting”** instead of “Simplified Reporting.” In practice, this would mean every working Ohioan receiving SNAP would have to call their county JFS office and submit new paystubs *every month* if their income changed by \$100. That’s the difference of just a few shifts a week for the hourly workers that depend on SNAP to supplement their low wages. And it would be a tremendous burden for counties. In 2018, roughly 500,000 workers lived in households that participated in SNAP over the course of a year, including home health aides, retail cashiers, cooks, and janitors, nearly all of whom are paid hourly and always have variable paychecks.
2. **Senate Bill 17 would require county JFS offices to check “assets”** – including bank account balances and car values – for all 1.5 million Ohioans enrolled in SNAP, along with all future applicants. Most households with more than \$2,250 would be denied food assistance. *That’s not even enough to cover first and last month’s rent on a 2-bedroom apartment in Cleveland.*⁵ Such a harsh asset test will force families to view any opportunity to save as a threat to their children’s nutritional needs, rather than a stepping stone to a better life. Asset tests are the ultimate poverty trap.

Sadly, I witnessed what can happen when well-meaning state leaders decide to re-impose an asset test for SNAP, as Pennsylvania did in 2012. Two things immediately happened:

- (1) Thousands of eligible seniors began disenrolling in SNAP or declining to apply because they were afraid to turn over their bank statements to SNAP caseworkers. These older adults lived in constant fear of being scammed and understood that making a copy of their bank statement and putting it in the mail wasn’t a good idea, even if they didn’t have enough food to take with their medications.
- (2) At least 111,000 Pennsylvania households were denied SNAP benefits for failing to “prove” that they did not, in fact, have a bank account.⁶ How exactly does one prove a negative?

The reality is that the majority of SNAP applicants and recipients have virtually no liquid assets by the time they apply for SNAP. Most families wait as long as they possible can before turning to SNAP for help – in part because of the shame that debates like this imposes on our neighbors in need. So before applying they drain their bank account; they

⁵ See <https://www.rentcafe.com/average-rent-market-trends/us/oh/cleveland/>

⁶ See “States Rethink Asset Tests for People on Food Stamps,” *Governing Magazine*, May 12, 2015. Available at <https://www.governing.com/archive/gov-states-rethink-asset-test-people-food-stamps.html>.

rely on friends and family; they wait in miles-long car lines at the food bank; and parents skip meals to make sure their children have something in their bellies at bedtime. In fact, roughly half of all SNAP applicants qualify for “expedited” processing of their SNAP applications – meaning the application is supposed to be processed within 7 days, instead of the standard 30 days – because their expenses exceed their income and they have absolutely no resources left by the time they apply for SNAP.

3. **Senate Bill 17 would take food away from children whose parents have informal support arrangements.** It would do so by disqualifying custodial and/or non-custodial parents for failing to establish paternity or pay child support. Such a policy is rooted in racist stereotypes about single parents and has proved to be expensive and ineffective in the few states that have pursued it in recent years.⁷ Most importantly, forcing parents into formal child support arrangements in exchange for food would hurt children’s well-being and could put the safety of the family at risk. Just ask those who work to prevent domestic violence.
4. **Senate Bill 17 would needlessly complicate food shopping for SNAP recipients and grocery retailers.** In yet another example of a policy that was tried - and failed - in other states, Senate Bill 17 would require SNAP EBT cards to include a photograph of an adult member of the household. While this proposal may seem benign, it comes with a host of practical challenges. Specifically:
 - a. Federal law allows any member of the SNAP household to use the EBT card to purchase groceries, along with anyone the household asks to assist them with shopping. *This has proven vital during the pandemic as elderly residents relied on family members and neighbors to shop for groceries on their behalf in order to reduce their exposure to COVID-19.*
 - b. Any picture on the card would, by law, have to be ignored by the grocery retailer as they check out customers, unless that store checks the photo IDs of every single shopper, regardless of their form of payment. Any grocery clerk that misunderstands federal SNAP law and denies an EBT shopper the opportunity to purchase groceries because their photo isn’t on the card would be exposing the retailer to discrimination lawsuits.
 - c. As we all know, the pandemic has also accelerated the trend of online grocery shopping. Fortunately, this is now an option for SNAP customers too, rendering photos on EBT cards even more obsolete.

⁷ For example, a North Carolina pilot found that the program cost \$2 million to implement, but only led to \$7,000 in child support payments to 12 families over the course of a year. Utah also studied this issued and found it would cost between \$3.2 and \$3.6 million. See “Food Stamp Child Support Cooperation Study,” University of Utah, August 2014. Available at le.utah.gov/interim/2014/pdf/00005534.pdf.

- d. The vast majority of SNAP applications and renewals are processed by phone, mail, and online, not in-person. EBT cards are mailed to households from an out-of-state mail house. Requiring SNAP recipients to visit their JFS office in-person to have a picture taken would upend more than a decade of progress towards more efficient JFS offices and a return to an antiquated and much more expensive in-person business model.

From listening to Sponsor and Proponent testimony on Senate Bill 17, I understand that this Committee wants to do something to address “fraud” in public assistance programs. And since I am not an expert on Unemployment Insurance, I cannot offer suggestions on how to stop the international criminal ring that has sought to defraud that program. But I do know SNAP and its rigorous quality control and payment accuracy system.⁸ As the Ohio Department of Job and Family Services can surely tell you, SNAP has an extraordinarily low rate of “trafficking” – what you think of as fraud – and county JFS offices already investigate and prosecute cases of misuse. SNAP simply does not have a problem with fraud. I encourage you to reject Senate Bill 17 and would welcome any opportunity to work with you on policies that would actually reduce hunger in our communities.

On behalf of my pastor, Blessed Sacrament Father John Thomas Lane, and the entire Saint Paschal Baylon Social Action Commission, thank you again for the opportunity to testify, and I would be happy to answer any questions you may have.

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⁸ See <https://www.fns.usda.gov/snap/quality-control> for a basic primer on SNAP’s Quality Control process.

Ohio Department of Job and Family Services
APPLICATION/REAPPLICATION VERIFICATION REQUEST

To receive a food assistance deduction for the following expenses you must report and provide verification to your caseworker of: rent or mortgage payment, utility and/or other shelter costs, medical expenses, dependent care expenses, and legally-obligated child support paid to a non-household member. Failure to report or verify any of the below listed expenses will be seen as a statement by your assistance group that you do not want to receive a deduction for the unreported or unverified expense(s). If you are applying for a cash program, it may be necessary for you to provide additional information (e.g. proof of pregnancy.) I understand that the CDJFS will assist me in obtaining required verifications for as long as I cooperate.

PROOF OF IDENTITY (Must be provided for yourself & your authorized representative, if you have one)

- * drivers license
- * state identification card
- * voter registration card (not for Medicaid)
- * school identification card (with photo)
- * work badge or building pass (with photo)
- * draft card or military ID
- * U.S. passport or U.S. ID card
- * credit card with signature
- * clinic card or shot record (for pre-schoolers only)
- * current report card, if available

PROOF OF AGE (Proof of age is only needed for food assistance if you are age 60 or over and wish to claim a medical deduction or work exemption.)

- * birth certificate
- * delayed birth certificate
- * baptismal record
- * school record
- * state or federal census record
- * insurance policy
- * marriage certificate (not license)
- * military discharge papers
- * draft card
- * U.S. passport
- * drivers license

PROOF OF U.S. CITIZENSHIP OR ALIEN STATUS

- * U.S. Passport
- * certificate of U.S. citizenship
- * naturalization certificate
- * consular report of birth
- * INS I-94, I-151, or I-551
- * alien registration card
- * other Immigration and Naturalization Service documents

PROOF OF OTHER DISABILITY

- * RSDI or SSI check
- * RSDI or SSI award letter

PROOF OF SOCIAL SECURITY NUMBER (for each person in need of assistance)

- * social security card
- * correspondence from the Social Security Administration containing person's name and social security number
- * award letter from Social Security Administration
- * Medicare card
- * employment records
- * tax returns
- * official document containing social security number
- * copy of "SSA-5028", receipt for social security number application
- * copy of "SSA-2853", from the Social Security Administration

PROOF OF EMPLOYMENT TERMINATION

- * notification letter which shows the reason employment ended, the date the employment ended, and the amount of the last pay
- * name, address, and telephone number of former employer(s)

PROOF OF RESIDENCY

- * rent receipt with your name, address, amount paid, and landlord's name and phone number
- * lease agreement
- * mortgage book
- * utility bills

UTILITIES, PROPERTY TAXES, HOME INSURANCE, RENT/MORTGAGE (if you wish to receive credit for paying them)

- * rent or mortgage
- * telephone
- * gas or oil
- * electric
- * sewer
- * home insurance
- * property tax statement
- * condominium fees

PROOF OF OTHER EXPENSES

- * non reimbursable medical expenses if you are 60 or older or disabled and wish to claim a medical deduction
- * dependent care expenses
- * legally obligated child support payments paid to or for a non-assistance group member

PROOF OF INCOME OR HOURS WORKED

- * last four paycheck stubs
- * letter from employer
- * court support order or other legal document
- * benefits (award) letter
- * if self-employed, copy of last income tax statement
- * rental income (statement from tenant)
- * strike pay
- * if self-employed, books or bookkeeper's name and phone number
- * verification of hours worked for able-bodied adults without dependents

PROOF OF INELIGIBILITY FOR BENEFITS

(you must provide a letter or form which shows ineligibility or expiration of any of the following benefits for which you have applied)

- * social security
- * supplemental social security (SSI)
- * veterans benefits
- * unemployment benefits
- * worker's compensation
- * disability or sick benefits
- * union fund or pension benefits
- * railroad retirement benefits

PROOF OF ASSETS (for each person in need of food assistance benefits; this does not apply if your assistance group is eligible for, Ohio Works First (OWF), Disability Financial Assistance (DFA) Disability Medical Assistance and/or Supplemental Social Security (SSI), or a member is authorized to receive Prevention Retention and Contingency (PRC) benefits or services or Ohio Benefit Bank (OBB) services).

- * a written statement of cash on hand
- * checking and/or savings account statement
- * trust fund statement
- * Keogh plans
- * IRA's
- * stocks or bonds
- * life insurance policies
- * annuities

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- (1) mail: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410
- (2) fax: (202) 690-7442; or
- (3) email: program.intake@usda.gov.

For any other information dealing with Supplemental Nutrition Assistance Program (SNAP) issues, persons should either contact the USDA SNAP Hotline Number at (800) 221-5689, which is also in Spanish or call the [State Information/Hotline Numbers](#) (click the link for a listing of hotline numbers by State); found online at: http://www.fns.usda.gov/snap/contact_info/hotlines.htm

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