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July16, 2015

My name is Ruth Hoffman and I am the director of Lutheran Advocacy Ministry-NM which has advocated with and for people living in poverty and with hunger for over 30 years. Our organization is a ministry of the Rocky Mountain Synod of the Evangelical Lutheran Church in America. I also speak on behalf of the NM Conference of Churches, which includes the NM representations of the United Methodist Church, the Presbyterian Church (USA), the Episcopal Church (USA), the United Church of Christ, the Christian Church (Disciples of Christ), the Community of Christ, and the Evangelical Lutheran Church in America, as well as the three Roman Catholic Dioceses in our state. We are people of faith who are very concerned about our many neighbors living in poverty and with hunger. As people of faith, we believe that all are beloved children of God, that we are all called to care for one another and that government is one of the ways that we can care for each other. I am here today to strongly state that these new requirements should not be added to our state's SNAP program. The proposed rule mandates that parents with children over the age of 6 to participate in unpaid work activities in order to receive SNAP benefits. This is not required by federal law. The economic situation in our state remains in the doldrums. Unemployment remains high at over 6%<sup>i</sup> and jobs are certainly not easily found. New Mexico has the nation's highest rate of long-term unemployment, with over 45% of our unemployed workers



searching for work for more than 27 weeks<sup>ii</sup>. Remember, that to be counted among the "long-term unemployed," someone must be looking for work for more than 27 weeks. Our state's economy is lagging behind.<sup>iii</sup> We rank 7<sup>th</sup> as a state with 21% of our population living in economic distress.<sup>iv</sup> New Mexico has among the highest rates of poverty and hunger in the country and nearly 30% of our children are experiencing hunger.<sup>v</sup> The SNAP program is vital to those struggling to meet their families' nutritional needs. It is also vital to local grocery stores and to our economy.

Implementing this mandatory work activity requirement is a complex task for the Human Services Department. HSD does not track the outcomes of their current SNAP work program. Many questions must be answered and the answers to those questions must be focused on what are the best ways to help low-income New Mexicans move to family-sustaining income. Where are the jobs and do they pay a family-sustaining wage? Where is the job training? What is community service and how will it be administered? It is very doubtful that HSD or SL Start, the work program contractor, has the capacity to manage the thousands of participants that must now be added to the work program caseload. It is unwise to expand our state's SNAP work requirements when there is no evidence that HSD's current work program helps SNAP participants get jobs or attain job skills. The outcomes of the program are not tracked, making it difficult to know if the program is working. More questions arise: How will participants be screened and assessed? Where is the child care and how will it be paid for? How will the many other barriers to employment be evaluated and addressed? The answers to these and other questions must be complete, verifiable and tracked over time.

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We fear that participants will simply be pushed off the SNAP program when they are unable to comply with a poorly planned and poorly administered program. This will most certainly harm struggling families and their children. This approach seems to be based on an assumption that people and families who seek assistance are trying to avoid responsibility. They are not. They are trying to survive in a very difficult economic situation. They are trying to raise their children in a safe environment. Families need stable, affordable housing. Children need quality early childhood education. Parents need good-paying jobs. They don't need to be pushed off benefit programs and out of the safety net. Our many neighbors living in poverty and with hunger need programs that help them move to family-sustaining income, programs that are well-planned, effective, and accountable and that recognize and address the numerous barriers faced by struggling families.



<sup>&</sup>lt;sup>i</sup> U.S. Bureau of Labor Statistics, May 2015

<sup>&</sup>lt;sup>ii</sup> Governing website, July 8, 2015

<sup>&</sup>lt;sup>iii</sup> <u>Forbes</u> website, as of November 2014: "New Mexico ranks in the bottom six overall for a second straight year largely due to a lousy current economic climate and a weak forecast."

<sup>&</sup>lt;sup>iv</sup> Economic Innovation Group website, July 5, 2015 The study looked at factors like poverty, unemployment, educational attainment, housing vacancy rates, median income ratios and changes in employment and business establishments.

<sup>&</sup>lt;sup>v</sup> "Map the Meal Gap" Feeding America, 2014