April 18, 2018

The Honorable Michael K. Conaway, Chairman
Committee on Agriculture
United States House of Representatives
Washington, DC 20515

The Honorable Collin C. Peterson
Ranking Member, Committee on Agriculture
United States House of Representatives
Washington, DC 20515

Dear Chairman Conaway and Ranking Member Peterson:

The United States Conference of Catholic Bishops, Catholic Relief Services, Catholic Charities USA, Catholic Rural Life, and the National Council of the U.S. Society of St. Vincent de Paul take this opportunity to respond to the Chairman’s mark of the “Agriculture and Nutrition Act of 2018” (H.R. 2).

Domestic Hunger and Nutrition: Food is a basic need and a fundamental human right. Food production and the ability to feed oneself and a family are essential national concerns. We urge you to protect and strengthen the Supplemental Nutrition Assistance Program (SNAP) by maintaining eligibility, improving outreach, streamlining enrollment, and including case management in efforts to align state employment and training activities to improve access to living wage jobs. While it is true that the number of people on SNAP continues to decline, still millions, particularly those in rural communities, continue to rely on SNAP for basic needs.

The bill makes commendable investments in the Emergency Food Assistance Program (TEFAP) and reauthorizes the Commodity Supplemental Food Program (CSFP). These two programs are vital lifelines for senior citizens and local food bank programs. In addition, the bill makes modest improvements to SNAP by updating its asset and vehicle limits and fixing the adjusted limits to inflation over time. Continued improvements to the asset limits should provide working families both the incentive and the ability to build savings.

However, the bill makes several changes which would negatively impact low-income and working families. By eliminating state options for broad-based categorical eligibility, the bill could cause as many as 2 million individuals to lose their benefits, and potentially remove state flexibility in 42 states. These changes particularly hurt working families making between 130% and 200% of the federal poverty line. State options for broad-based categorical eligibility should be maintained.

Currently, almost all individuals on SNAP are required to work or look for work. H.R. 2 would restrict the time allotted to persons between the ages of 50 and 60 and to unemployed or underemployed parents with children above the age of six to find employment or enroll in job training from three months to one month. The bill also sharply increases the penalty for non-compliance with work requirements. Under current law, it is one-month ineligibility for the first violation, and three months for the second. The new bill, however, would increase the penalty for the first violation to one full year, and to three full years for the second violation. Moreover, rural communities may find compliance especially challenging given that job training programs are often located far away, and there is insufficient access to transportation.

Efforts to improve state workforce training programs by providing case-management, streamlining workforce programs, providing increased training slots and setting minimum standards are welcomed. However, the new workforce training program appears to lack sufficient investment to meet the additional demand for meaningful job training and skill building that will be generated by the new requirements. In addition, states will have only two years to create the new workforce training program and will be unable to wait for outcomes of ongoing SNAP workforce pilot programs. We urge you to support the workforce training improvements but provide greater investments and time for states to establish evidence-informed and meaningful job training programs.

International Food Security and Development: We appreciate the Committee’s steadfast support for international food assistance programs, including Food for Peace, McGovern-Dole, Food for Progress, and the Farmer-to-Farmer programs. These programs help to keep famine at bay, improve the livelihoods of small farmers so they can feed their families, helping school children excel in their studies, and leverage the expertise of American volunteers to support food security outcomes of our poorest brothers and sisters overseas. We are particularly thankful for the Committee maintaining important reforms provided in the 2014 Farm Bill, and advancing positive changes like removing the monetization requirement in Food for Peace and allowing Community Development Funds to be paired with Food for Peace development activities.
Together, these pieces improve the efficiency and effectiveness of international food aid programs for the people they serve. We also look forward to continuing to work with the Agriculture Committee to advance some additional reforms, such as making permanent funding in McGovern-Dole that supports local ownership of school feeding programs and addressing the overcharges in some food aid programs due to cargo preference requirements.

**Subsidies:** The bill’s proposed increases to programs that offer a reasonable amount of support for our commodity and dairy farmers is laudable. Allowing farmers to update Price Loss Coverage yields to reflect yield reduction due to drought could help many farmers continue to sustain crop production despite past years’ losses. The bill’s protection of the USDA from cuts will enable it to continue to place staff in rural communities to help farmers diversify crops, get access to new markets, and receive assistance on technical issues.

**Conservation:** The conservation title plays an essential role in ensuring that the earth is protected, reminding us of God’s invitation to “cultivate and care for” creation. In the Chairman's mark, the total funding for the conservation title is cut by almost $1 billion and the Conservation Stewardship Program (CSP), currently the largest conservation program, is eliminated. While this cut is compensated in part by an increase in the Environmental Quality Incentives Program (EQIP), the elimination of the CSP implies the end of a comprehensive conservation approach in the Farm Bill. The Conservation Reserve Program (CRP) would see an increase of 5 million acres, yet farmers would be compensated less for this land, which could ultimately discourage conservation efforts. There is also a concerning provision which would allow the EPA to approve pesticides while avoiding reviews to protect endangered species. These reviews are essential to protect human and environmental health.

**Rural Development:** Rural communities and small towns are the backbone of the social and economic life of America. Yet their viability is jeopardized by slow economic improvement, aging infrastructure, the opioid epidemic, under-employment, and the movement of younger generations to other communities. The extension of authority to set aside 10% of EQIP funds to benefit beginning farmers and socially disadvantaged farmers is praiseworthy. The reauthorization of funds for the Beginning Farmer and Rancher Development Program (BFRDP), the Rural Business Investment Program, and the increase of funds for the Organic Agriculture Research and Extension Initiative (OREI) will assist the development of these communities, and the prioritization of projects that address health emergencies under the Community Facilities Direct Loan and Grant Program will bring relief to many families, including those most impacted by opioid addiction.

This is a crucial time for our nation to put poor and hungry people first, support small and moderate-sized family farms, promote sustainable stewardship of the land, and help vulnerable farmers and rural communities both at home and in developing countries. We look forward to working with you as you amend the 2018 Farm Bill.

Sincerely yours,

Most Rev. Frank J. Dewane
Bishop of Venice
Chair, Committee on Domestic Justice and Human Development

Most Rev. Timothy P. Broglio
Archbishop for the Military Services USA
Chair, Committee on International Justice and Peace

Mr. Sean Callahan
President
Catholic Relief Services

Sr. Donna Markham, OP, PhD
President and CEO
Catholic Charities, USA

Mr. James Ennis
Executive Director
National Catholic Rural Life

Mr. Ralph Middlecamp
President, National Council of the U.S. Society of St. Vincent de Paul