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Pathways, Not Punishment: An Annotated SNAP Employment and Training Advocacy Toolkit for Policy Newbies

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PATHWAYS, NOT PUNISHMENT:

An Annotated
SNAP Employment & Training
Advocacy Toolkit for Policy Newbies

ANGELA
EASTLUND



**Pathways, Not Punishment:
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Advocacy Toolkit for Policy Newbies**

Angela Eastlund

Capstone Project 2018-2019



STEVENSON CENTER
FOR COMMUNITY AND
ECONOMIC DEVELOPMENT
Illinois State University



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A Very Special Thanks:

I would like to thank the Policy Team: Mari Castaldi, Director of Policy and Advocacy, Carrie Thomas, Executive Director, Angela Morrison, Policy Associate, and Eric Halvorson, Policy and Communications Associate and all of the wonderful folks at the Chicago Jobs Council who had the patience to guide and mentor a policy newbie like me over the past year. I've grown and learned more than I could have imagined. I hope this toolkit serves as not only a useful resource, but also as a memory of the time we shared taking bold steps to bring our pie in the sky goals into reality. Here's to a bright future of achieving even bigger goals!

VISION

The vision of this toolkit is to inform future policy advocates at the Chicago Jobs Council on the spectrum of policy strategies through the example of SNAP Employment and Training (SNAP E&T) policy advocacy. This toolkit describes a snapshot of ongoing advocacy between August 2018 - July 2019.

This annotated advocacy toolkit was completed to fulfill part of the Master's degree requirements for the Cultural Anthropology and Applied Community and Economic Development program through the Department of Sociology and Anthropology and the Stevenson Center at Illinois State University. All advocacy actions and materials were developed within the Chicago Jobs Council, a non-profit organization based in Chicago, Illinois.

PURPOSE OF TOOLKIT

For someone brand new to public policy advocacy, the concept can seem broad and putting it to practice can seem vague. In part, this is because the spectrum of public policy advocacy *is* broad and contains a vast variety of actions under its umbrella. The Chicago Jobs Council's policy advocacy strategies around SNAP Employment and Training that are recounted in this toolkit are shared in context with the intent of shedding some light on the why, how, and when particular strategies are utilized. Our hope is that the examples shared here can be used to inform anyone that is a "newbie" to policy advocacy work, or just needs a refresher on how to adapt a policy tool or strategy to a new policy issue.

SECTION 1.

An Overview of SNAP and SNAP Employment and Training

The Supplemental Nutrition Assistance Program (SNAP), formerly referred to as “food stamps,” is one of the nation’s most effective anti-hunger programs. SNAP is administered by the United States Department of Agriculture (USDA), specifically under the Food and Nutrition Services (FNS) department. In Illinois, during Fiscal Year 2016, SNAP provided about \$3.04 billion dollars in food benefits to a monthly average of 1,914,393 people.¹ SNAP has complex administrative rules that determine who is eligible, how much they receive, and what they are required to do as a condition of receiving benefits. Certain populations are required to work or participate in employment services in order to receive benefits on an ongoing basis. (This is known as a “work requirement.”) As such, in addition to distributing food assistance, states are required to run SNAP Employment and Training (SNAP E&T) workshops as an option for SNAP recipients who are designated to meet work requirements.

SECTION 2.

Chicago Jobs Council’s SNAP E&T policy positions are based on the following foundational premises:

1. SNAP is first and foremost an *anti-hunger* program, not a workforce development program.
2. Anyone who wants to work should have access to quality, sustainable employment.
3. SNAP E&T, as a voluntary, accessible program, could be a helpful resource and opportunity for SNAP recipient job seekers.

SECTION 3.

Historical Context of Welfare Reform and Work Requirements

The first food stamp program (FSP) was enacted in 1939 in response to an agricultural market crisis. Rural American farms were producing a surplus of goods and thus experiencing a sharp drop in crop prices. To help prop up the declining crop prices, the government began the FSP and offered people living in poverty the option to buy orange food stamps in the quantity of their normal food budget, and then receive blue food stamps for 50 cents on the dollar. The orange

¹ <https://fns-prod.azureedge.net/sites/default/files/ops/Illinois.pdf>

stamps could be used for any food type and the blue could only be used to buy whatever the government deemed to be surplus at the time. World War II increased demand for American agricultural products, and the program was largely shut down. Meanwhile, research was underway as to how such a program could be reimagined and reinstated to help the American public during times of crisis.

In 1961, President Kennedy started FSP pilot programs to explore restarting the program nationwide, and in 1964, President Johnson enacted the Food Stamp Act, which made the program permanent across the country. The major actions of the Food Stamp Act:²

- Required each state to develop a State Plan of Operation and eligibility standards;
- Required that recipients pay up front for their food stamps with what they could afford in their average food budget, and then the food stamps that were allotted were an equal amount to that budget plus the additional needed to bring the recipient up to the sum cost of a normal, low cost, nutritious diet, as determined by the agency;
- Established eligibility of all food items except alcoholic beverages and imported foods;
- Prohibited against discrimination on basis of race, religious creed, national origin, or political beliefs;
- Divided responsibilities between states (certification and issuance) and the federal government (funding of benefits and authorization of retailers and wholesalers), with shared responsibility for funding costs of administration.

In the 1980s and 1990s, U.S. welfare programs faced mounting bi-partisan scrutiny. Political rhetoric and media platforms pushed propaganda using the stereotype of the “welfare queen”, touting at the forefront the farcical image of a black, urban single mother living in luxury off of the public dollars she received via welfare benefits. The “Welfare Queen” moniker is popularly attributed to Ronald Reagan’s campaign speeches, but he borrowed the phrase and exaggerated the story from Chicago Tribune news coverage about a woman named Linda Taylor.³ The image, despite its racially charged and false portrayal of the lived experience of recipients of welfare, fueled meritocratic discussions at the federal level on how to cut back welfare program spending and limit access to curb welfare “dependency”. The Food Stamp Act of 1985 required all states to implement an Employment and Training (E&T) program. But despite these additional “welfare to work” requirements, the narrative of the welfare queen persisted in popular culture. In 1989, 64% of polled Americans thought that, “welfare benefits make poor people dependent and encourage them to stay poor.”⁴ This perceived public sentiment spurred future political campaigns around welfare reform and fueled the stigma of the welfare queen.⁵

² <https://www.fns.usda.gov/snap/short-history-snap#1939>

³ Page, Clarence. “Chicago’s ‘welfare queen’ still colorizes our poverty debate”. May 24, 2019. *Chicago Tribune*.

<https://www.chicagotribune.com/columns/clarence-page/ct-perspec-page-welfare-queen-linda-taylor-josh-levin-ronald-reagan-20190524-story.html>

⁴ Gershon, Livia. “Why Welfare Reform Didn’t End Welfare Stigma”. August 4, 2016. *JSTOR Daily*.

<https://daily.jstor.org/why-welfare-reform-didnt-end-welfare-stigma/>

⁵ Ibid.

In 1996, Democratic President Bill Clinton, facing re-election and following a failed major campaign to pass progressive healthcare legislation within a Republican majority Congress, signed into law the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA), otherwise popularly known as “welfare reform”. The PRWORA that passed was the third draft of the bill, following two previous versions that were vetoed by Clinton for being “backward” and “soft on work and tough on children”.⁶ When signing the bill, then-President Clinton proclaimed that the PRWORA would be “the best chance we will have for a long, long time to complete the work of ending welfare as we know it, by moving people from welfare to work, demanding responsibility, and doing better by children”.⁷ The PRWORA gave significant power and flexibility to states to use their designated funding to subsidize private sector job creation. Clinton remarked that states now had a responsibility to deliver on this challenge, because “you can’t tell people to go to work if there’s no job out there”.⁸

The major changes ushered in by PRWORA included:⁹

- Eliminating eligibility of most legal immigrants for food stamps;
- Placing a time limit for able-bodied adults without dependents (ABAWDs) who are not working at least twenty hours a week or participating in a work program so that they would only be allowed to receive SNAP for three out of every thirty-six months;
- Revising provisions for disqualification;
- Requiring states to implement Electronic Benefit Transfer before Oct. 1, 2002.

Clinton admitted that there were serious flaws in the bill and as he was signing PRWORA into law, promised to pursue legislative changes to those flaws. Ultimately, some amendments were made. The Balanced Budget Act of 1997 (BBA) (P.L. 105-33) and the Agricultural Research, Education and Extension Act of 1998 (AREERA) made amendments to PRWORA, such as:¹⁰

- More than doubling Employment and Training (E&T) funds, but requiring states use at least eighty percent of those funds on providing non-exempted ABAWDs with work program opportunities;
- Allowing states to exempt up to 15 percent of ABAWDs who would otherwise be ineligible;
- Restoring eligibility for certain elderly, disabled and child immigrants who resided in the United States when PRWORA was enacted

⁶https://www.nytimes.com/1996/08/01/us/text-of-president-clinton-s-announcement-on-welfare-legislation.html?mtr_ref=www.google.com&gwh=BBC8BAB3D415EB0BD2869C4FFA76F573&gwt=pay

⁷ Ibid

⁸ Ibid

⁹ <https://www.fns.usda.gov/snap/short-history-snap#1939>

¹⁰ Ibid

In May 2002, The Farm Security and Rural Investment Act, also known as the 2002 Farm Bill, was enacted. Major amendments to original PRWORA policy:¹¹

- Restored eligibility for food stamps to qualified aliens who have been in the United States for at least five years and for immigrants receiving certain disability payments and for children, regardless of how long they have been in the country;
- Adjusted the standard deduction to vary by household size and indexed each year for inflation;
- Cut E&T funding and replaced the requirement of targeting at least 80 percent of E&T funds toward ABAWDs with a separate allocation to reimburse States that ensure availability of work opportunities to non-exempted ABAWDs

While these changes were applied over time, aspects such as work requirements and time limit restrictions remained attached to welfare programs such as SNAP. Employment and training programs now exist across the country, including within Illinois, in compliance with the conditions of access to SNAP federal funding set by the PRWORA.

In its current form, the SNAP Employment and Training program is restrictive and complicated to navigate. Yet despite these oversight systems and structures in place, the power of the 1980s welfare queen rhetoric persists. In 1985, the LA Times conducted a poll of asking questions about public benefits and perceptions of work ethic, employment opportunities, and government responsibility for people living in poverty.¹² They repeated that same poll in 2016 with 1,202 people to gauge public sentiment over the time passed and found that at least for the population polled, the perception that people currently on public benefits would “prefer to stay on welfare” had increased over time from 20 percent in 1985 to 33 percent in 2016. The perception that the government knows enough to end poverty for people below the poverty line, even if willing to spend whatever is necessary to completely end it in the United States, went down from 73 percent in 1985 to 56 percent in 2016. While the sample size of the 1985 poll is unknown, and likely not as generalizable as a sample, these are concerning results. Is there a growing mistrust in federal government knowledge and expertise? Why might perceptions of people’s willingness to work be declining? There are no simple answers to these questions, but there is one thing we know for certain from our experience laid out in this toolkit: work requirements that are attached to public benefits remain a controversial political topic in America and in Illinois locally.

¹¹ Ibid

¹² Lauder, Thomas Suh and Lauter, David. “Views on poverty: 1985 and today”. August 14, 2016. *LA Times*. <https://www.latimes.com/projects/la-na-pol-poverty-poll-interactive/>

SECTION 4.

SNAP E&T System Overview

There are several levels of SNAP and SNAP Employment and Training administration and program delivery. The United States Department of Agriculture oversees the Food and Nutrition Service (FNS), which houses the federal nutrition programs, including SNAP. FNS distributes SNAP funding to states and oversees their compliance with federal laws. States use federal funding to administer the program and determine who is eligible to be “work registered” (see Section 5 for details on how this is determined). In Illinois, the Department of Human Services (DHS) administers SNAP and SNAP E&T, and direct client services are located in local DHS offices. DHS contracts with workforce development organizations, non-profits, and other job training programs to provide SNAP E&T programs that comply with funding and reporting requirements. Local DHS offices are responsible for tracking SNAP work registrant’s compliance with work requirements and/or participation in E&T programs. **Figure 1. SNAP**



Administration

Illinois Map of SNAP E&T Providers

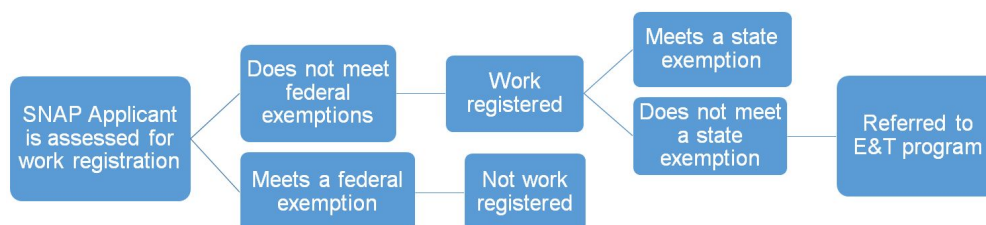
See Appendix 1.A and 1.B or see full online interactive map at:

https://drive.google.com/a/cjc.net/open?id=1IYrHhWEWKMbTQ1O_4V-j9sfGGnGmGA3V&usp=sharing

SECTION 5.

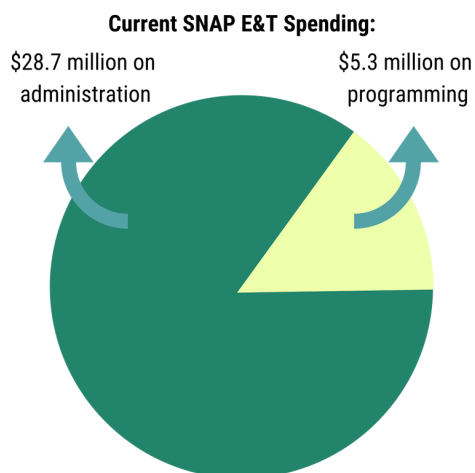
Who is required to meet SNAP work requirements?

When applying to receive SNAP benefits, the federal government requires that SNAP recipients that are between the ages of 18-49 be screened for eligibility to be “work registered”. If an individual in this age range is not working an average of 20 hours a week, they are required to either find sufficient employment hours or participate in employment and training programs (if available), or risk losing their SNAP eligibility. If SNAP recipients are working over 20 hours a week, are parents of children under six, have a disability, and/or are a full time student, they are exempted from these work requirements. **Figure 2. SNAP Assessment Process**



If a SNAP recipient does not meet any of these exemptions, and is subsequently “work registered”, they are referred to a SNAP E&T program and required to attend if one is available in their area. SNAP E&T program activities can include a wide variety of workforce development services. **Figure 3. SNAP E&T Budget Allocation in Illinois**

The ultimate goal of SNAP E&T, as stated by the USDA, is to move SNAP recipients to “self-sufficiency”, or in other words, to reduce their reliance on public benefits.



For years, the Jobs Council and several partner organizations have recognized that the SNAP E&T program in Illinois is not functioning in a way that lifts people out of poverty through employment, but rather threatens the food security of low-income individuals and job seekers. Ultimately, the current available SNAP E&T programs in Illinois do not adequately serve the work registrant population due to excessive administrative oversight and limited access to quality services.

Across Illinois’ 102 counties, only 29 counties have at least one SNAP E&T program available. For the programs available in those 29 counties, only about 3,000 program

“slots” are available for SNAP work registrants to fill. Within those 29 counties, over 300,000 people are “mandated” to participate in E&T if they are not meeting work requirements in other ways.

Therefore, Illinois mandates participation in a SNAP E&T program that does not have enough slots for the people required to participate in it, and according to the budget breakdown, relatively little is spent on actual programming to help people gain workforce development skills.

Additionally, according to the Fiscal Year 2018 Illinois SNAP E&T plan submitted to the USDA, the Illinois Department of Human Services has a SNAP E&T budget of about \$34 million dollars. Within that budget, about \$29 million is spent on administrative costs, such as staffing and overseeing work requirement compliance, and only about \$5 million is dedicated to actual employment and training programming.

Ultimately, these figures expose the shortcomings of the SNAP E&T program as it currently functions. It does not have the capacity to serve the number of individuals that are mandated to participate, nor is the funding for the program effectively spent on actual job training programming. The SNAP E&T program has room for improvement and the following narrative

explains how the Jobs Council helped facilitate positive change.

**SNAP E&T has
approximately:**

~300,000
mandated participants

~3,000
available program slots

Figure 4. SNAP E&T Capacity

SECTION 6.

SNAP EMPLOYMENT AND TRAINING POLICY ADVOCACY: A NARRATIVE TIMELINE

Background Context

The Chicago Jobs Council has long been an advocate for SNAP as a critical food access support for job seekers and people struggling to make ends meet. Because the administrative structure of SNAP Employment and Training is multilevel, the Jobs Council has engaged in advocacy campaigns that focus on each of the federal, state, and local agencies. Examples of these multifaceted policy strategies can be found in this toolkit.

The advocacy timeline of events described in this narrative represents only a snapshot of the time and efforts that the Jobs Council has put towards protecting SNAP and improving the SNAP Employment and Training program for low income job seekers. Political landscapes of

the past have presented insurmountable barriers to progressing on some of the policy goals that the Jobs Council has worked towards. Luckily, despite an unfriendly federal administration in place, the 2018 election cycle carried in a new, friendlier state administration which brought about the opportunity to take bold action towards positive SNAP E&T policy changes. This timeline begins a few short months before the 2018 gubernatorial election. Though the following events may be in the past, the underlying advocacy strategies will more than likely be used again and again. By providing examples of these advocacy tools and messaging strategies in context, we hope the reader will find them useful to refer to when engaging in future policy advocacy campaigns and determining how and when a strategy can be most effective.

Narrative Timeline

On September 30th, 2018 the Agriculture Act of 2014 (known as the “Farm Bill”) was scheduled to expire. The Farm Bill is an expansive piece of legislation that authorizes and funds a wide variety of nutrition and agriculture programs in the United States. Congress was tasked with negotiating and passing a new version of the bill to determine reauthorization and funding for the programs under its umbrella. The Republican majority-led House of Representatives passed a version of the Farm Bill that included new language that intensified the existing work requirements as a condition of receiving SNAP. Anti-poverty advocates, knowing the harmful effects and ineffectiveness of work requirements, took on the task of educating and lobbying legislators about the harmful effects that such a change would have on SNAP recipients. The

House Farm Bill progressed to the Senate for renegotiation.

With the November 2018 midterm election just a few months away, there was no sure sign whether or not the Senate expected to pass the bill prior to the September 30th expiration date. Therefore, on September 13th, 2018, the Jobs Council sent an Action Alert email to our advocacy email list to urge recipients to participate in a SNAP call-in day organized by national advocates.

While the Farm Bill advocacy was on-going in the fall of 2018, the Jobs Council was actively and regularly meeting and checking in with our SNAP policy advocate partners, specifically Illinois Hunger Coalition, Shriver Center on Poverty Law, Heartland Alliance, and Greater Chicago Food Depository. In addition to the potential federal threats to

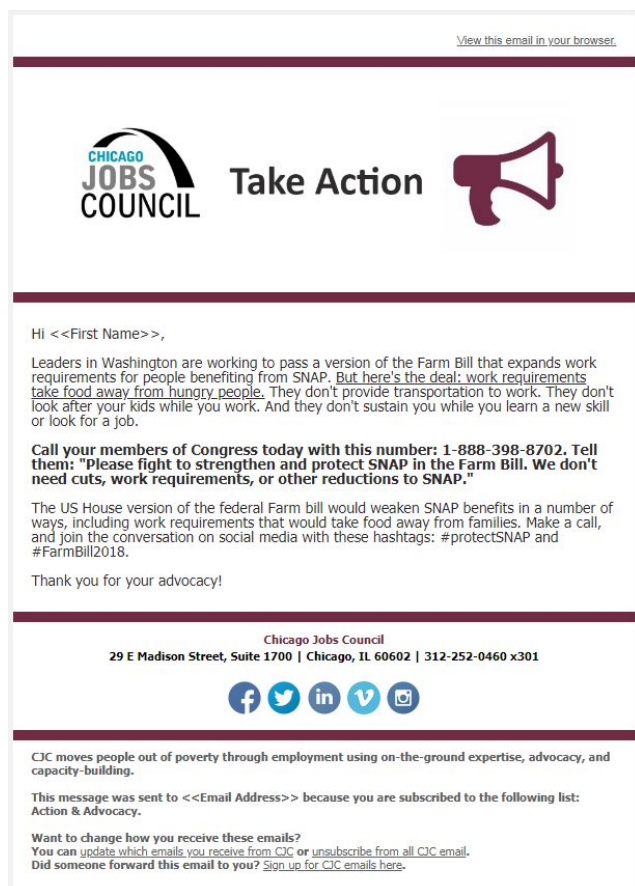


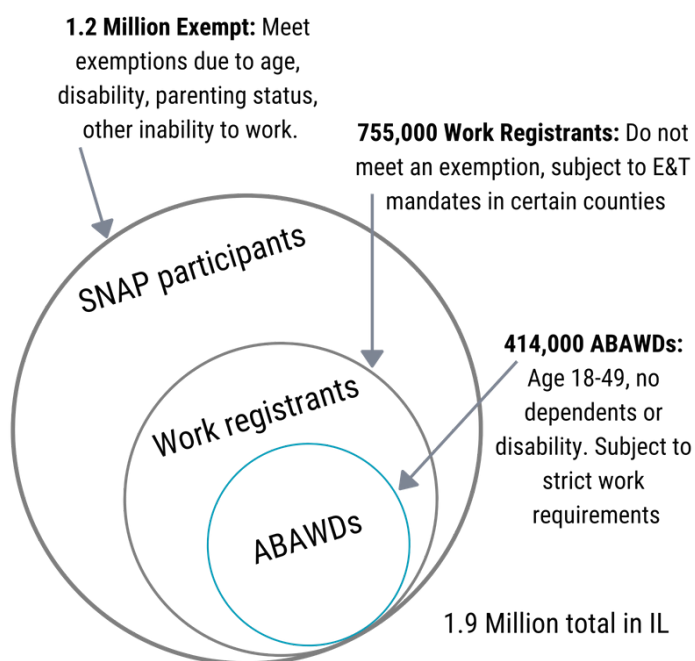
Figure 6. Action Alert Email on the Farm Bill

SNAP, rumors were circling that the Illinois Governor Bruce Rauner was considering not applying for an important SNAP waiver for the state.

Federal law requires that a certain category of SNAP recipients (Able-Bodied Adults Without Dependents, or ABAWDs) can only receive benefits for three months total in a three year period unless they met strict work requirements. This policy is known as the ABAWD time limit. You can see a visual breakdown of the ABAWD population within the larger SNAP recipient population in Illinois in Figure 7.

For a policy newbie: A simple call about an issue to a legislator can be an easy entry-level act of advocacy. When making an action ask, it's helpful - and often expected/essential - to make information and the act itself as easy and accessible as possible. By including phone numbers, a suggested script, and some popular hashtags, people with busy schedules can quickly take action.

If that rule were in effect in Illinois, an estimated 400,000 people could lose their food benefits.¹³ However, for many years, the State of Illinois had applied for and received a waiver of the time limit ("ABAWD Waiver") based on higher than average unemployment rates throughout most of the state. Illinois must proactively apply for a new waiver each year to continue to qualify. Governor Rauner had applied for this waiver the previous three years of his tenure, but rumors were circulating that he may not request a waiver for 2019.



The ABAWD waiver was in place in 101 out of 102 counties in Illinois. . (In 2018, DuPage county's relatively lower unemployment rate made it the first county in Illinois not eligible to apply the time limit waiver.) With the impending possibility of Gov. Rauner choosing not to file for a waiver for the eligible areas of the state, the Job Council's conversations with partner advocates largely focused on determining collaborative strategies to advocate that the Governor apply for the ABAWD waiver.

The impending gubernatorial election added a layer of complication to advocacy strategizing. Opinions differed amongst our partners about when and how to

¹³ According to estimates reported to FNS in the Illinois State SNAP E&T plan for Fiscal Year 2019

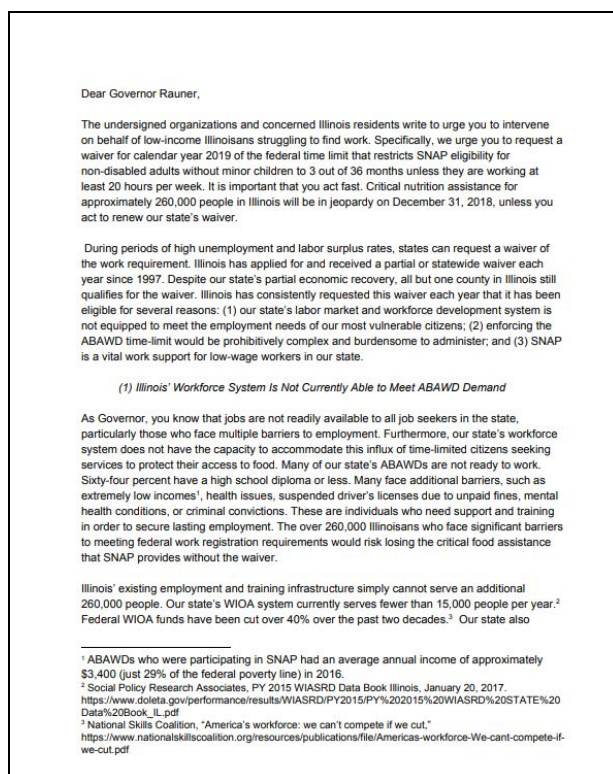
Figure 7. Population Categories in SNAP

advocate on this issue. Some advocates urged patience, noting that the Governor was likely focusing on the election and public pressure could expose the issue to stronger opposition. Others advocated for more aggressive strategies, pointing out that there was a chance that if Governor Rauner lost re-election, he would not have as much motivation to apply for the waiver.

At the Jobs Council, we were leaning towards the more proactive strategy. With partner SNAP advocates, the Jobs Council signed on to a letter that expressed the negative effects that not applying for the waiver would have on people in the ABAWD category struggling to make ends meet. In addition to limiting access to food, it would severely affect the economy of the communities that have higher concentrations of SNAP recipients. This letter presented a blend of the unique expertise of the signed organizations, specifically on the topics of the overwhelmed Illinois Department of Human Services systems and the insufficient opportunities in workforce development for job seekers.

The Jobs Council also authored another letter that focused solely on the gaps and insufficiencies of the workforce development field in Illinois to serve the people in the ABAWD population. The SNAP Employment and Training program's functionality relies solely on the capacity of the existing workforce development programs, and the governor needed to understand that the current capacity was simply not enough to expect it to be effective for an influx of thousands more people. The letter also expressed how critical food access is for a job seeker to be successful in a training program or job search.

Figures 8. & 9. Letters to Governor Rauner on the ABAWD Waiver



Policy newbies will quickly learn that it is often only possible and effective to do policy advocacy work through collaborative efforts. Partners might be individuals with lived experience, individual allies, policy makers, or policy advocate partner organizations and staff. When joining in to advocate for an issue, it is important to listen and learn from people who have already been doing the work. If you are not the expert in the room, take every opportunity to gain more knowledge about the issue to better lend your voice and opinions on advocacy and strategizing. Be sensitive to the fact that there are likely complex histories of relationships, networks, and alliances of people and organizations that you are not yet aware of.

Meanwhile, another federal threat to SNAP and other public benefits was looming on the horizon. President Trump's administration had proposed a federal rule change to the definition of the "public charge" designation. Under the public charge rule, receipt of certain public benefits by a non-citizen individual or their family member can count negatively against their future application to become a citizen of the United States. Essentially, the rule change proposed adding several public benefits, including SNAP, to the list of public assistance factors that count against a prospective citizen. This anti-immigrant proposed rule change prompted fear and confusion across Illinois and the larger US immigrant populations, and sparked a nationwide campaign asking the public to oppose the rule change. The Jobs Council participated in this advocacy by sending out an Action Alert email to our advocacy email list, explaining what the harmful effects of the rule change would be and included a template comment for people to customize. We also included links to read the proposed rule change and where to submit a comment. While this rule change was not directly related to SNAP E&T, the Jobs Council was aware that there was a lot of misinformation circulating about the rule change as to how and when it would be implemented. We wanted to make sure that the workforce development.

Figure 10. Public Comment Template Included in Action Alert Email

Ultimately, then-Governor Rauner lost his reelection bid to Democratic opponent J.B. Pritzker. Prior to the election, Rauner did not apply for the ABAWD waiver, but shortly before Thanksgiving 2018, and soon after our second co-authored letter to his office, he officially applied. This outcome was a big win for Illinois SNAP recipients and advocates resulting from the pressure we put on the administration.

TEMPLATE COMMENT

Samantha Deshommes, Chief, Regulatory Coordination Division
Office of Policy and Strategy, U.S. Citizenship and Immigration Services
Department of Homeland Security
20 Massachusetts Avenue NW
Washington, DC 20529-2140

Re: DHS Docket No. USCIS-2010-0012

[DATE]

[NAME OF PERSON]
[NAME OF ORGANIZATION]
[ADDRESS]
[ADDRESS]

Re: Opposition to Proposed Changes in Public Charge Policies

Dear Samantha Deshommes,

[NAME OF ORGANIZATION] strongly opposes the proposed changes to federal policies regarding the public charge. The proposed regulation would enact extensive and far reaching damages on individual, local, state, and federal government and stakeholder efforts towards meeting workforce training and education goals. The proposed rule changes will further entrench barriers to self-sufficiency for vulnerable populations and disincentivize job seekers from enrolling in skill building education and training programs, ultimately damaging our nation's effort to build a skilled workforce.

Many low income people seek and participate in workforce development and education programs to obtain licenses, certificates, or degrees in order to improve their earnings potential and achieve sustainable, prosperous, family-supporting careers. While workforce development and educational services are not among those discouraged through these proposed rule changes, many people may be scared to seek out those services based on their perception of the intent of this rule. Furthermore, many people who seek professional development rely on other public benefits in order to be successful in their education or training. In sum, both of these dynamics will disincentivize low-skill individuals from engaging in pathways to self-sufficiency through higher wage earnings. For example,

The people that the Department of Human Services prioritizes for public benefits assistance services (including low-income, low-skill, or low-literacy adults) are also priority populations identified by our organization [INSERT: Organization Name Here] for [INSERT: Name and Description of Employment and/or Training program(s) examples]. These program participants need opportunities to build towards obtaining licenses, certificates, and degrees in order to achieve sustainable, prosperous, family-supporting careers. [INSERT: Example here].

It is clear that the intent of these proposed policy changes is to punish people who utilize public benefit programs. However, if the federal government wishes to reduce reliance on public benefits, it should instead increase resources that go towards workforce development and help advance strategies that promote access employment as a pathway out of poverty. This proposed policy would do the opposite - it would further entrench barriers to financial stability such as housing instability, chronic unemployment, and hunger.

[INSERT: Organization Name Here] urges the Department of Homeland Security to reject and withdraw the proposed changes to existing public charge regulations and continue to welcome and allow immigrants supported opportunities for professional and educational advancement and overall well-being.

Thank you for your consideration.

Sincerely,
[INSERT: Organization Name Here]

For a policy newbie: When a federal administration wishes to make policy rule changes without going through the legislative process, the rule is written up and proposed to the public, where it can be found and read on the Federal Register website. As soon as the proposed rule change is made public, there is a duration of time - usually 60 to 90 days - that is set as an opportunity for the public to express their opinions on the rule change and its perceived effects. The public can submit written comments through the federal register website or by mail during this time period. Once the designated time period is complete, the comment period closes and no further comments are accepted. In theory, the administration then counts and reads each individual comment to take into consideration the view of the public on whether or not to implement the rule change. Because a high volume of comments takes longer to review and therefore may delay implementation of a proposed rule, one policy advocacy strategy for a harmful rule change can be to encourage others to submit comments about the rule change.

field was able to properly inform clients and have the opportunity to submit a comment.

The public charge was not the only rule change the Trump administration had planned. On December 11th, 2018, the US Senate passed the bipartisan Agriculture Improvement Act, the

2018 version of the Farm Bill. This version reauthorized and actually strengthened SNAP funding and programming. It did not include the strict work requirement increases that were included in the House version of the bill. SNAP advocates across the country claimed the Farm Bill passage as a huge win. Despite the bill being a result of bipartisan negotiation, the Trump administration decided to leak to the public their intention to sidestep Congress and increase work requirements for SNAP through an administrative rule change. This news came out towards the end of December, and the expected rule change was expected to be officially posted at the start of 2019. In a turn of events, the Trump administration's failure to secure funding for their proposed US-Mexico border wall triggered a government shutdown in January 2019, thus barring the ability of the administration to post any proposed rule changes during that time. Many states, including Illinois, scrambled to secure timely SNAP benefit distribution to clients as the shutdown dragged on. The Jobs Council contributed to a public education campaign to update SNAP recipients and workforce development organizations about how SNAP was being affected by the shutdown.


The shutdown had a silver lining, in a policy sense, for SNAP advocates such as the Jobs Council, as it gave extra time after the holiday hiatus to prepare advocacy strategies to fight against the impending proposed rule change. At the Jobs Council, we prepared a public comment and a template comment for partner organizations and individuals. When the shutdown ended, the Trump administration was quick to post the rule change, and the clock began on the timeline to submit comments.

On January 31st, the Jobs Council submitted bill language to the Illinois Legislative Review Board that would form the content of a bill to functionally shift Illinois' SNAP E&T program from a mandatory model to a voluntary model, meaning SNAP recipients would not be required to participate in E&T programs, but could if they desired. We decided to jump on the opportunity to work with a friendly state administration on a change that we had long been advocating for, but

seemed out of reach in previous years. During this period, we consulted several of our partner SNAP advocates and listened to their advice and expertise on Illinois legislators and processes. Some advocate partners expressed deep concern about the real possibility of strong opposition from powerful Illinois legislators. We took this to heart when considering all of our options to make this change. Some advocates suggested pursuing the alternate option of meeting with new leadership at the Department of Human Services and working to implement an administrative rule change rather than a bill. This was definitely a great option to make a more immediate change within the on the ground administration of SNAP E&T in Illinois, and we ultimately pursued both paths. We also considered that an administrative rule change could be more vulnerable to be overturned if a less friendly administration came into office in the future, and decided to take the risk of pursuing legislation because the result would be more permanent.

On February 14th, 2019, the Jobs Council sent out an Action Alert email to our advocacy email list, urging contacts to fight against harmful rule changes. Similar to the public charge action

Figure 11. Federal Register Public Comment Instruction Guide

 <p style="text-align: center;">2019 SNAP E&T Proposed Federal Rule Changes Public Comment Submission Instructions</p> <p>1) Read the proposed rule and open the page to submit comment: https://www.federalregister.gov/documents/2019/04/08/2019-06878/supplemental-nutrition-assistance-program-requirements-for-able-bodied-adults-without-dependents</p> <p>2) Address your comment using the following format:</p> <p>Certification Policy Branch SNAP Program Development Division Food and Nutrition Service, USDA 3101 Park Center Drive Alexandria, Virginia 22302</p> <p>RE: Proposed Rule: Supplemental Nutrition Assistance Program (SNAP) Requirements for Able-Bodied Adults without Dependents RIN 0984-AE57</p> <p>(DATE) (NAME OF PERSON) (NAME OF ORGANIZATION) (ADDRESS) (ADDRESS)</p>	<p>Dear Certification Policy Branch:</p> <p>3) Draft the body of your comment</p> <ul style="list-style-type: none"> The first line of the comment should get directly to the point and should state your organization's name and state your opposition to USDA's Proposed Rulemaking on SNAP requirements and services for Able-Bodied Adults Without Dependents (ABAWDs). Describe your organization, what it does, etc. Describe your organization's connection to SNAP, and SNAP employment and training <ul style="list-style-type: none"> Describe how many of your clients are enrolled in SNAP, and SNAP Employment and Training programs Describe the role that SNAP plays in your client's lives, how it contributes to the success in your program, etc. Describe the harmful effects that the proposed rule changes will have on the populations and communities that your organization serves. Consider adding in some of the following talking points: <ul style="list-style-type: none"> Specific harms that will be imposed on Illinois: <ul style="list-style-type: none"> Expose 415,000 people to hunger and food insecurity in Illinois alone. <ul style="list-style-type: none"> Taking away food assistance from job seekers will not increase the likelihood that they will find quality employment or move out of poverty. Rather, it will have the opposite effect and fuel cycles of hunger and poverty. Force limited SNAP resources to be spent on compliance monitoring rather than employment services. <ul style="list-style-type: none"> In Illinois, we know that there are simply not enough quality jobs or workforce development opportunities for an additional 415,000 people. Impose harmful ripple effects on the Illinois economy. <ul style="list-style-type: none"> According to USDA reports, every new dollar in SNAP benefits results in \$1.80 in total economic activity. The proposed rule changes would cause a reduction in the economic activity of local Illinois communities and adversely affect grocery retailers and agricultural producers. List additional harms that would be imposed on your organization and the people it serves. In closing, restate your opposition to the proposed rule changes, and urge the Certification Policy Branch to reject and withdraw these changes and instead continue to strengthen and support America's most successful anti-hunger program for the health and well-being of all. Sign and list contact information if appropriate. 	<p>4. Submission Options:</p> <p>To submit your comment, follow this link: https://www.federalregister.gov/documents/2019/04/08/2019-06878/supplemental-nutrition-assistance-program-requirements-for-able-bodied-adults-without-dependents</p> <p>Read the proposed rule change in its entirety if you wish, then:</p> <ol style="list-style-type: none"> Click "Submit a Formal Comment", in the green box in the top right corner area of the page. Attach your pdf file, and write "See attached file" in text box. <ol style="list-style-type: none"> OR copy and paste your comment into the provided text box. Submit appropriate contact information. Share that you commented and encourage others to do the same! <p style="text-align: center;">THANK YOU FOR YOUR ADVOCACY!</p>
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alert, we included instructions on how to submit a comment. In the wake of organizing public charge comments, we learned of the general rule comments must be at least 33 percent different to be considered as a unique comment and thus to be read and considered on its own by federal officials.

As such, we shifted our strategy on the template comment and instead created an outline of talking points to encourage people to create a more original comment to help avoid similar comments being lumped together.

For policy newbies: In an effort to get out the message about the SNAP ABAWD proposed rule change, we used several platforms to share information: we sent the Action Alert emails, made a blog post on the Jobs Council website, and shared the blog post on social media several times over the course of the comment period. We also shared partner organization's social media posts.

Given the widespread alarm in the field about how the state could respond to the possible rule change, our partners at the Shriver Center on Poverty Law asked the Jobs Council was asked to present on the topic of SNAP E&T to the larger "SNAP Advocates" meeting in February 2019. SNAP Advocates is a group of SNAP stakeholders from across Illinois representing food banks, service providers, legal services, and other advocates. About 20 people attended the meeting, as well as an additional, unknown number on the conference phone line. In the presentation, we tried to convey the problematic dysfunction, ineffectiveness, and inefficiencies of the current SNAP E&T program in Illinois, but also the opportunity to leverage our workforce system assets and the potential for growing the program. We also presented the case for shifting Illinois' E&T program to a voluntary program and as just one of many needed solutions for the program,



especially in light of the proposed federal rule changes that would affect the population of ABAWDs in the state.

SNAP E&T is a complicated program, and with little time to prepare for the presentation, it was important to write out what was going to be said. We tried to incorporate as many helpful visuals in the presentation as possible, because it's often hard to imagine the program's

Figure 12. SNAP E&T Presentation at Shriver Center

population breakdowns, the scope of where the program is accessible, and how the proposed rule change would affect Illinois without visual representations.

For a policy newbie: When presenting about policy issues, especially confusing ones, it is important to organize your thoughts and find the best possible way to convey your argument. Lead with where you're coming from - in our case, the Job Council's vision statement. Once you have organized the story, following the rule of "show, don't tell" can be helpful. Be creative and use simple maps and graphic design platforms like Canva to visualize data. Consider your audience and their knowledge on the subject, and don't assume they will agree with your stance or solution. It can be useful to do a quick check in question at the beginning to gauge the familiarity of a program such as E&T, so that you don't end up wasting time on what people already know. Be sure to invite questions!

During the latter half of February, we prepared to send out the final version of the SNAP E&T report that we had been compiling and writing over the last few months. The report contained our research on current USDA recommended best practices for SNAP E&T programs, and the current shortcomings and inefficiencies of Illinois' SNAP E&T programs. It also contained our policy recommendations and gave context to our arguments for the changes that need to be made. We put a lot of time and effort into the report and we wanted to make sure it got into the hands of our partners, and most importantly, the right decision and policy makers. We knew that we wanted to send the report to certain important decision makers directly, in addition to sharing on a few broader email lists. To make sure we reached everyone, we compiled a checklist of people to send the report to directly, as well as a draft of the email content to include that was catered to the individual or organization.

For a policy newbie: A policy report is essentially a deep dive into an examination of an issue within historical-political context, a clear explanation and an argument for the need for change, and a roadmap for possible solutions. Policy reports are the result of extensive research that provides evidentiary qualitative and/or quantitative data about a policy issue and its effects on the public. Due to the nature of the necessary research, writing a policy report requires some level of expertise on the subject. While the reports lean on research, they are ultimately advocacy documents that can serve as an authoritative resource that builds the logic for our policy aims.

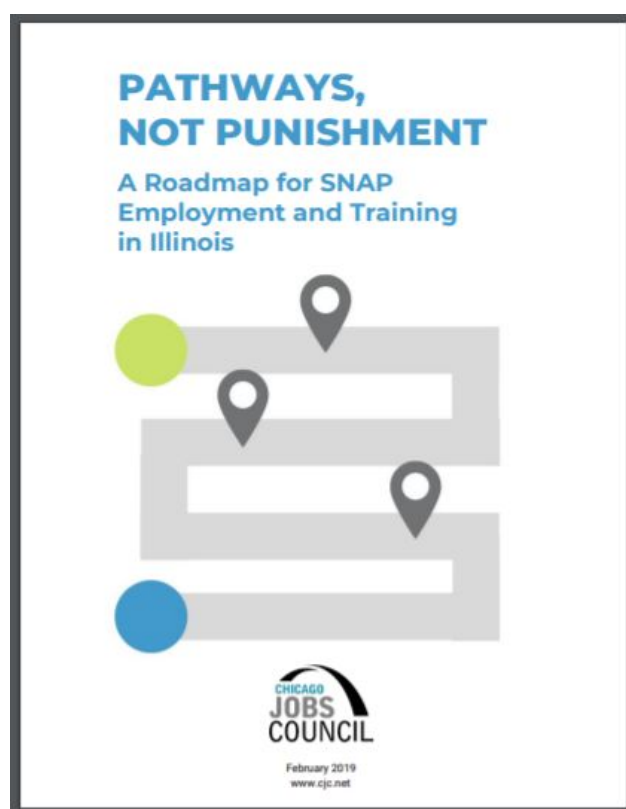
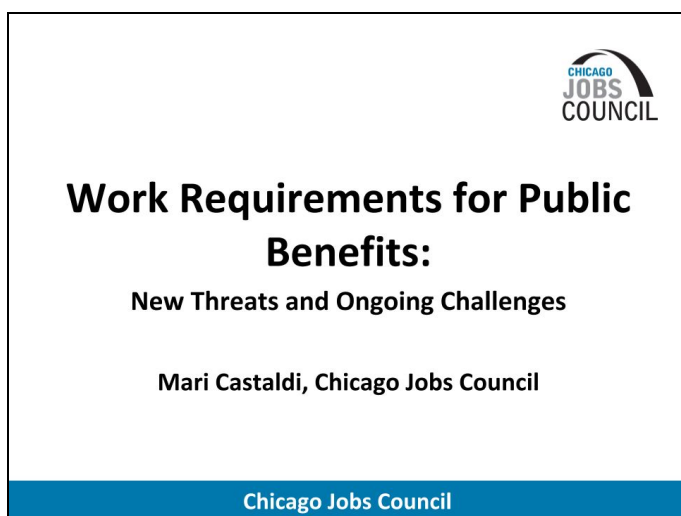


Figure 13. SNAP E&T Report

The SNAP E&T report required a lot of editing and rewriting to keep up with political happenings and to maintain the report's relevancy. In our case, the final editing of the SNAP report was a collaborative effort of the policy team, who provided feedback on clarity, did read throughs, and suggested edits. In total, the report was developed over about five months.

On March 13th, the Jobs Council hosted our monthly Workforce 360 meeting. Our Workforce 360 meetings are our opportunities to bring together our policy and practice members and partners to present on relevant topics in the field, highlight innovative and successful programs and organizations, ideate solutions to common problems and barriers, and to generate

discussion and networking. We decided that it would be a timely opportunity to talk about SNAP Employment and Training with our attending member organizations and partners, given that the federal proposed rule changes comment period was open. Using some of the slides and content from the SNAP E&T presentation given to the Shriver Center SNAP advocates meeting in February, Mari Castaldi, our Director of Policy, gave an overview presentation on the current state of SNAP E&T in Illinois and the potential policy changes ahead. To give attendees a broader perspective on SNAP E&T in Illinois, we asked our partners Diane Doherty (Illinois Hunger Coalition) and Matt Weiss (National Able Network) to participate in a panel discussion. Diane spoke to the Illinois Hunger Coalition's experience and knowledge on the issues that exist



in the current state of the program and Matt spoke to National Able Network's experiences as a contracted SNAP E&T program provider and the potential for Illinois to expand E&T programming services through SNAP E&T funding. Mari's presentation and the panel led to a vibrant discussion about SNAP and SNAP E&T. Now that the attendees knew more about the ABAWD rule change, we asked them to submit comments to fight against and delay the rule change, as organizations and private citizens. We provided the comment instruction guide as a hand out and included it in the follow up email resources.

Figure 14. Presentation at Workforce 360 Meeting

We submitted the Jobs Council's public comment for the proposed ABAWD federal rule change in late March, 2018. We drafted the first version in a similar format to the public charge public comment that we wrote earlier in Fall 2018. From that point, editing and honing our argument was a collaborative effort across the policy team. In building our argument, it was important to stake out our connection to and our expertise in workforce development and the barriers to employment that job seekers face in our economy because we believe those arguments will be more compelling to a more conservative, jobs-focused administration.. Our base level argument, across all SNAP E&T advocacy, is that SNAP is first and foremost is an anti-hunger program, not a workforce development program, and that taking food assistance away from people who are already struggling is not only morally and ethically wrong, it also hinders people's ability to reach the so-called "self-sufficiency" goal that the SNAP E&T program aims towards. We also wanted to express how the rule change would only exacerbate the already ineffective and inefficient administrative oversight burden on the Illinois Department of Human Services. Finally, we wanted to point out that SNAP plays an important role in our local economies by reminding the administration that by the USDA's own calculations, every SNAP benefits dollar results in about \$1.80 in local economic activity.¹⁴

¹⁴ <https://www.fns.usda.gov/ops/snap-community-characteristics-illinois>

For a policy newbie: When writing a public comment to be posted on the federal register, it is important to consider the audience that you are writing for. Sometimes, the argument that might make the most sense to you, isn't the argument that would be the most convincing for someone else. For example, sharing a personal story of a policy's harmful effects might sway one policy maker's mind, but another might be more influenced by strong quantitative data. Therefore, it's important to be as thorough and well-rounded in your argument as possible. Use qualitative and quantitative data whenever possible. And remember: when a truly terrible policy like the ABAWD proposed rule change is in front of you, it is easy to get swept up in frustration and the temptation to express that anger can be strong. But (ideally), restraining that instinct and presenting logical arguments backed by experience and research is the clearer path to compromise and positive change.

On March 26th, we decided to send out another Action Alert email to our advocacy email list to

ask members and partners to raise their voice and submit a comment against the proposed SNAP ABAWD rule changes. We chose to send this reminder email out at the start of the final week of the comment time period to give people a few days to write up their comments. We included the links to the comment instruction guide, and this time added in a link to the comment that we submitted as the Jobs Council as an example for people to see. We also posted links to our blog posts with these same documents on our Facebook and Twitter pages several times throughout the week.

On April 5th, 2019 we presented a poster at the Illinois State University Graduate Research Symposium in Normal, Illinois on the current state of SNAP employment and training in Illinois and the SNAP E&T policy recommendations of the Jobs Council. The poster was well received by those who stopped by to learn more about the content, and a few people shared their lived experience of receiving SNAP benefits and participating in SNAP E&T programs outside of Chicago.

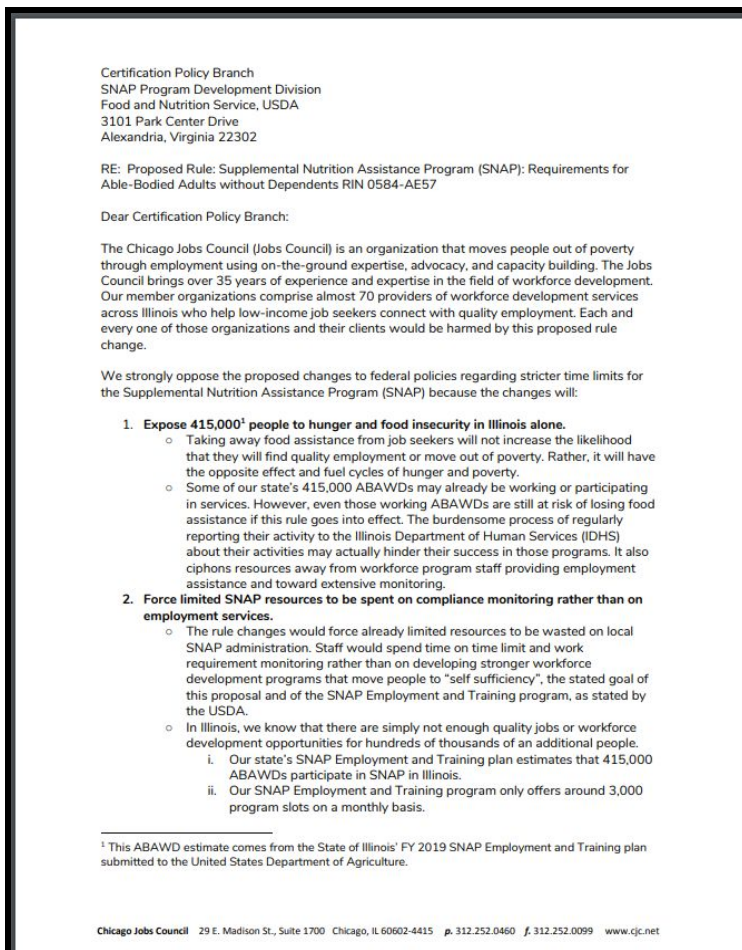


Figure 15. CJC Public Comment

The poster used lots of visuals to help better explain the often confusing components of SNAP E&T.

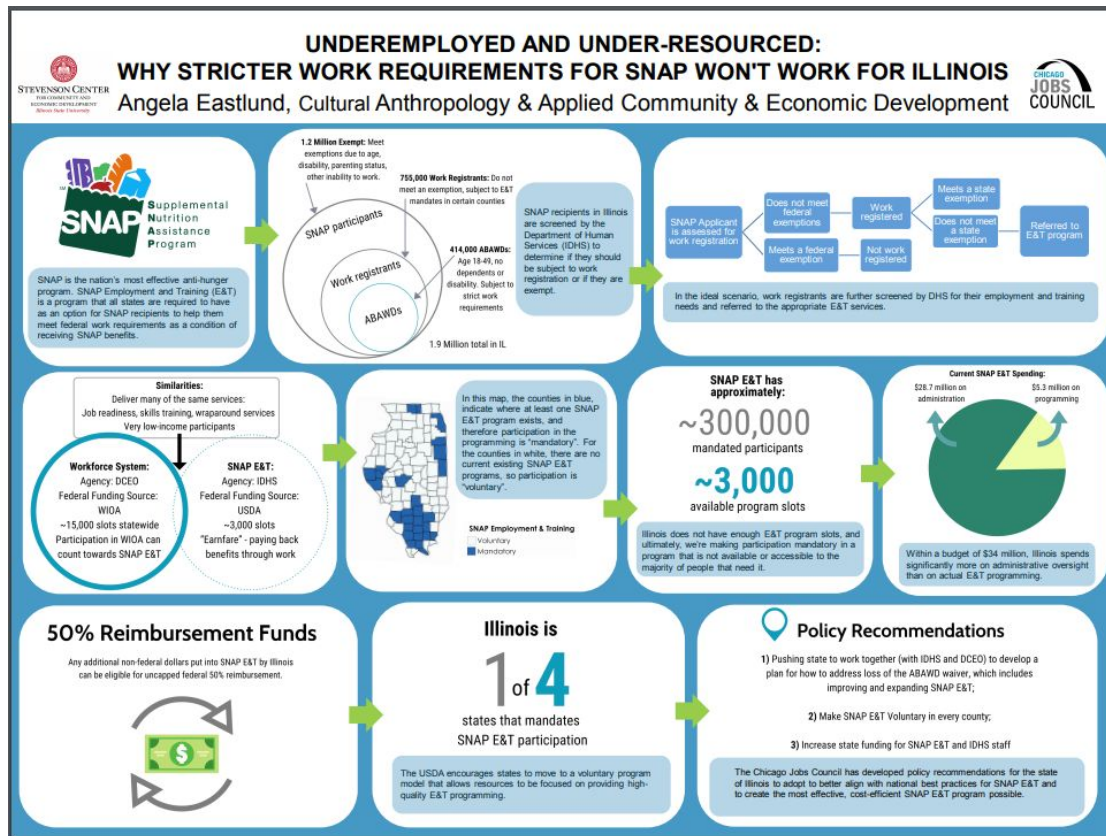


Figure 16. Poster Presentation Given at Illinois State University

For a policy newbie: A poster presentation or research symposium setting can be a great opportunity to hone your policy elevator pitch and test your ability to break down complicated policies to the easy-to-understand basics. It's helpful to see how different audiences respond to and their questions can help you hone the clarity of your content.

Although the initial deadline for the ABAWD federal proposed rule change comment period deadline was April 2nd, it was recognized that the Federal Register website experienced technical difficulties of some sort during the final days of the comment period, and therefore the comment period was reopened to the public for an additional 3 days, from April 8th through the 10th. This sparked an additional opportunity for us to spread the word about the proposed rule change and for more people to submit comments. We posted information about the extension on social media and sent out a new Action Alert email.

Once we sent it out, we realized that the original link to the federal register page for this rule change was not reopened, but instead, an entirely different link was being used for this new rule change extension period. We quickly went in to our website and created a link redirect to the

new comment submission link. While we're glad that we caught the change, it is disappointing to see that all previous communications then led to an inactive link. This is just one of many factors that make advocacy of this type just that more difficult to navigate for the average citizen. There is much room for improvement of our democratic processes in the digital age.

For the policy newbie: This extension was a good lesson in "it's not over until it's over" and a good reminder that we must stay vigilant to the policy happenings that occur around the issues that we work on. Expect the unexpected and stay on your toes!

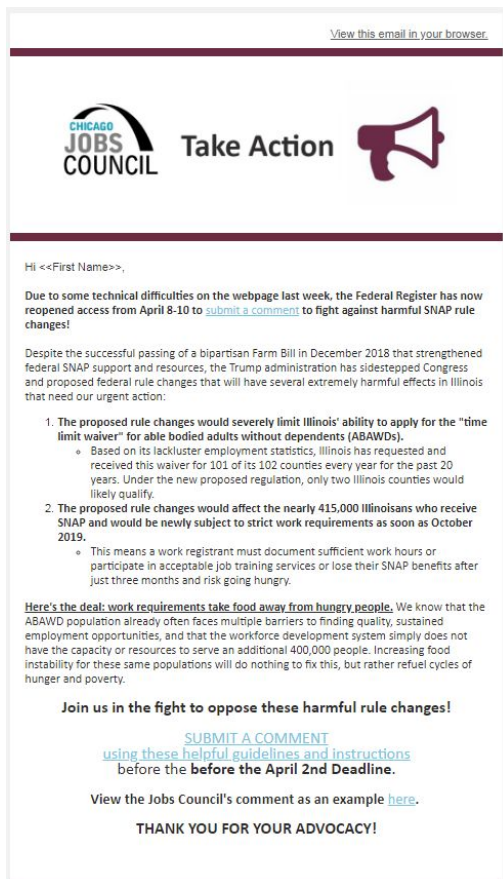


Figure 17. Action Alert ABAWD Public Comment

The Spring 2019 Illinois Legislative session was full of unexpected twists and turns. Throughout session, the Jobs Council staff, along with partner organization representatives, supported several bills that were introduced. One of the main bills we focused on was SB1791, which was sponsored by Illinois Senator Laura Fine, and House Representative Natalie Manley. Functionally, the bill, would change the state's SNAP E&T program from a mandatory model to a voluntary model. Specifically, this change was written into the bill as follows:

"(SB1791) Provides that the SNAP Employment and Training Program shall be voluntary in every county except those in which the Department of Human Services can show that there are sufficient program slots for at least the majority of the county's current non-exempt work registrants."

Under the current state of our SNAP E&T program (and most likely for the foreseeable future), Illinois does not

even come close to having enough E&T program slots available for at least 50 percent of mandatory participants, so therefore, across Illinois, SB1791 changes every county to a voluntary model program. This was one of our primary recommendations in our SNAP E&T report, and the change would align Illinois with recommended best practices from the USDA.

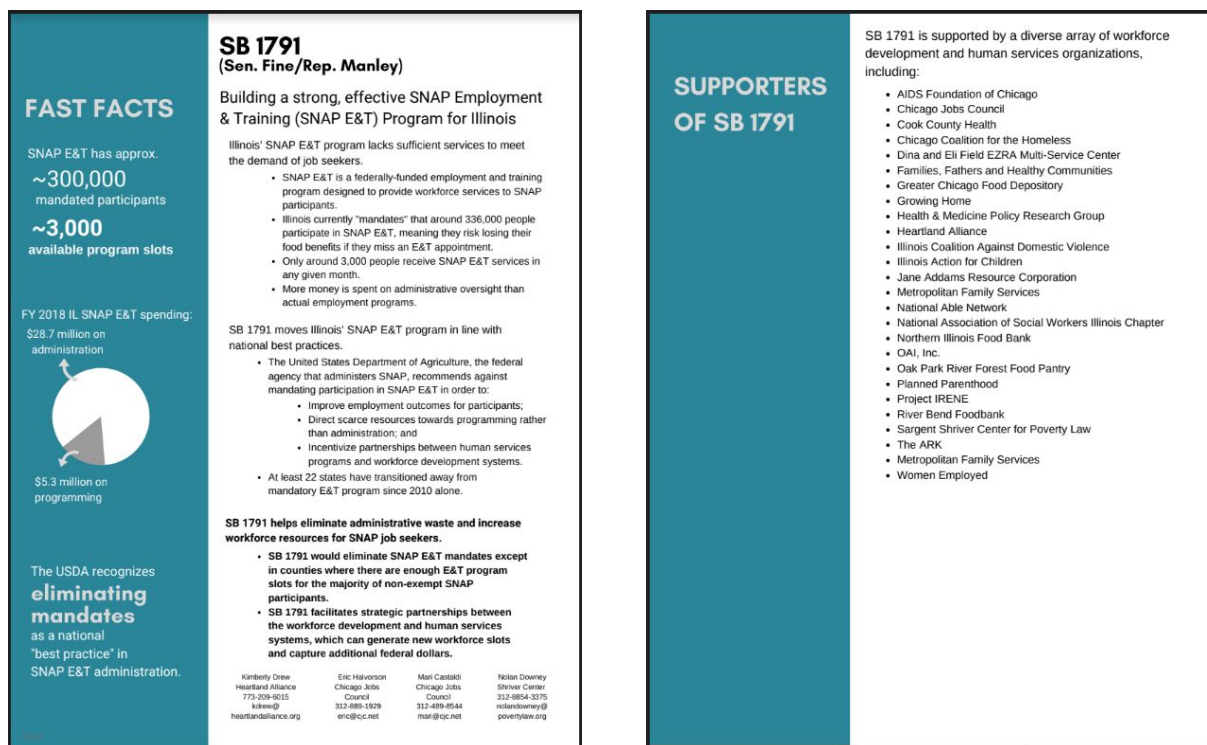
SB1791 was strategically written to keep legislators focused on the fact that Illinoisians, under a mandatory SNAP E&T model, are asked to jump through a hoop that doesn't exist. The Jobs Council knew from prior experience when explaining the two models, that the words "voluntary" and "mandatory" were often confusing and even inflammatory, and misrepresented the true

nature of the policies that they represented. Therefore, our messaging was critical to make sure we were not misleading in our conversations with legislators.

We refrained as often as we could from using the word “voluntary” when explaining the bill to legislators, and instead described the true nature of what the bill does using the following phrases: (SB1791) “removes unnecessary mandates and administrative burdens from the SNAP E&T program”. By avoiding the words voluntary and mandatory, it was much clearer to legislators what we were trying to do with the bill, and it helped us gain support from both sides of the aisle.

The Jobs Council staff and partners worked diligently throughout session to gather the support of legislators on both sides of the aisle. As is common for bill lobbying, we created a two page, double-sided fact sheet that gave the fast facts and details of the bill that could be handed out to legislators during quick conversations and meetings.

Figure 18 and 19. Fact Sheet Distributed to Legislators



Ultimately, the bill made its way through the required steps of the legislative process (see timeline below) and was officially declared passed on May 31st, 2019. As of June 2019, the bill is on its way to the Governor’s desk to be signed into law. This was a huge win for Illinois and SNAP E&T participants, and the advocates and partners of the Jobs Council! Advocates and partners of the Jobs Council are actively working in cooperation with the leadership of DHS to implement the changes within SB1791, and will continue to be vigilant to ensure that SNAP E&T becomes a more helpful and appropriate resource and opportunity for job seekers.

Conclusion

The intent for this toolkit was to provide examples of a variety of advocacy tools and strategies in the context of a real, successful advocacy campaign to allow the reader to see the advantages of how and when a tool or strategy can be used. The SNAP E&T policy advocacy above was filled with unexpected twists and turns of events, and showcases how a policy advocate needs to be flexible, agile and ready to think at both the micro, here and now, and the macro, big picture, levels. There is no “one size fits all” strategy to policy work because every situation has different factors that affect how decisions are made and how change can be enacted. Hopefully, the examples above will inform and assist the reader in discerning strategic actions and decisions. For a democracy to work on behalf of the citizens it serves, everyone can and should be informed on how to participate in policy advocacy at some level. There is no better teacher than experience, so hopefully a policy newbie will find this toolkit a helpful guide to dive in and get to work taking bold steps towards positive policy change.

For more detailed information about specific messaging strategies and a deeper dive into the documents and tools described in this narrative, see the “Annotated Policy Tools and Strategies Quick Guide” document that accompanies this narrative toolkit.

Section 7.

Legislative Process Timeline of Illinois SNAP E&T SB1791

- January 31st, 2019:
 - Bill language submitted to Illinois Legislative Review Board
- February 15th, 2019:
 - SB1791 Introduced
- March 12th, 2019:
 - SB1791 Passed the Senate Human Services Committee 07-03, and sent on to the Senate floor
- March 20th, 2019:
 - SB1791 Passed Senate floor 41-13, sent to House of Representatives
- April 19th, 2019:
 - Amendment 1 introduced to House of Representatives, Human Services Committee
- May 1st, 2019:
 - Amendment 1 and SB1791 Passed House of Representatives, Human Services Committee 14-00
- May 23rd, 2019:
 - SB1791 Passed House of Representatives Floor, 106-10
- May 31st, 2019:
 - SB1791 Officially Passed both Senate and House of Representatives, sent to Governor Pritzker's office to be signed into law.

Section 8. - Advocacy Timeline Snapshot

1/31	Language submitted to LRB for SNAP E&T bill
2/1	Letter sent to Sol Flores
2/1	Trump ABAWD waiver rule change announced
2/2	Response from Flores asking for meeting
2/5	Sent out policy brief for coalition feedback (Shriver, Heartland, GCFD, National Able)
2/9	Resilient Families Task Force report with recommendation about voluntary SNAP E&T
2/11	SNAP E&T Coalition Meeting (Shriver, Heartland, GCFD)
2/15	Angela E presentation to SNAP Advocates Coalition
2/15	Carrie/Mari meet with Julio re: Farm Bill integration
2/15	SB 1791 Introduced
2/21	"Behind the scenes" report release to state, local, workforce, advocacy partners
2/25	SNAP E&T Coalition Meeting (Shriver, Heartland)
3/5	Meeting with CWFA re: SNAP E&T
3/11	Phone call with DHS (Ian, Terry, Michelle)
3/12	SB 1791 passes Senate Human Services Committee
3/12	In-person meeting with: Ian Watts, Terry, Michelle from IDHS
3/13	W360: Work Requirements for Public Benefits
3/20	SB 1791 passes Senate 42-10
3/29	Strategy session with CLASP and CBPP
4/9	SB 1791 Assigned to Senate Human Services
4/25	First Meeting with IDHS Secretary Grace Hou
5/1	SB 1791 passes unanimously out of the House Human Services Committee
5/23	SB 1797 passes IL House 106-10
6/27	Letter requesting Gov Signature sent to Gov
6/28	Bill Sent from IGLA to Governor
7/17	SNAP E&T One-Day Planning Meeting Kickoff

APPENDIX 1.A



FY 2018 - All IL SNAP E&T Partners/Contractors

- ABJ Community Services, Inc
- Asian Human Services - Employment And Youth
- Balmoral Nursing Home
- Benton Township
- Breakthrough Urban Ministries
- Cara Program
- Carrier Mills Township
- Catholic Charities of the Archdiocese of Chicago
- Centralia Township
- Centers for New Horizons, Inc.
- Mount Vernon Township
- National Able Network
- National Able Network
- National Able Network
- National Able Network
- National Able Network
- New Age Services Corporation
- New Hope Community Service Center
- Northwest Community Center
- Northwest Institute-Learning
- Pembroke Township
- Phalanx Family Services
- Public Image Partnership Inc
- Sinai Medical Group
- Six Mile Township
- Southern Illinois Collegiate Common Market
- The South Suburban Council
- Springfield Urban League Inc
- Centers For New Horizons Inc
- Centers For New Horizons Inc
- Center For New Horizons
- Centers For New Horizons
- Centreville Township
- Champaign County Regional Planning
- Chicago Area Project Community
- Chicago Area Project
- Chicago Area Project
- Chicago Commons Association
- Community Assistance Program
- Community Assistance Programs

APPENDIX 1.B



Community Assistance Programs



Danville Township



Denning Township



East St. Louis Township



Employment Connection



Frankfort Township



Harrisburg Township Government



Haymarket Center



Healthcare Consortium



Human Resources Development Institute, Inc.



Inner Voice



Lakeview East Chamber of Commerce



Le Penseur Youth Services Inc



Massac County



Matthew House Inc



Murphysboro Township



St Leonard's Ministries



Saint Sabina Church



TCA Health, Inc.



Cabet Group



Stites Township



Triton College



Two Rivers Regional



Tyrone Township



United Services



Universal Family Connection



US Spice Mill Inc



Universal Overall

FY 2018 - SNAP E&T IL - EarnFare Providers



Balmoral Nursing Home



Benton Township Hall



Carrier Mills Township



Centralia Township



Centreville Township



Chicago Urban League



Denning Township



East St. Louis Township



Frankfort Township Office



Harrisburg Township



Human Resources Development Institute, Inc.



Inner Voice



Lakeview East Chamber of Commerce



Murphysboro Township



New Age Services Corporation



Northwest Institute-Learning



Pembroke Township



New Hope Community Service Center



Six Mile Township



Saint Sabina Church



Stites Township



Tyrone Township



US Spice Mill Inc



Universal Overall