



# CITY OF PHILADELPHIA

**JAMES F. KENNEY**  
Mayor

Office of the Mayor  
215 City Hall  
Philadelphia, PA 19107  
(215) 686-2181  
FAX (215) 686-2180

April 1, 2019

Certification Policy Branch  
SNAP Program Development Division  
Food and Nutrition Service, USDA  
3101 Park Center Drive  
Alexandria, Virginia 22302

**RE: Proposed Rule: Supplemental Nutrition Assistance Program (SNAP): Requirements for Able-Bodied Adults without Dependents RIN 0584-AE57**

Dear Legislative Committee:

As the Mayor of the City of Philadelphia, I am writing to express my strong opposition to the United States Department of Agriculture's (USDA) Proposed Rule on Supplemental Nutrition Assistance Program (SNAP): Requirements for Able-Bodied Adults Without Dependents (ABAWDs) published in the Federal Register on February 1, 2019. USDA proposes to tighten work requirements and impose strict time limits on SNAP benefits. This is an inappropriate attempt to do by administrative action what Congress recently considered—and declined to do—by legislative action.

This policy is counterproductive: taking away food from vulnerable Philadelphians hampers their self-sufficiency and creates additional barriers to finding employment. This short-sighted policy will unethically exacerbate food insecurity in Philadelphia and damage our local economy.

The proposed SNAP rule directly interferes with my administration's mission of strengthening the workforce in Philadelphia. It rests on a faulty assumption that reducing food assistance will help people find jobs. I agree that work is critical to the success and wellbeing of our communities; however, the City of Philadelphia sees SNAP as a crucial tool in helping people find work. My administration launched a comprehensive workforce strategy called Philadelphia's Talent Engine to address barriers that prevent Philadelphians from securing employment. SNAP advances this goal by helping over 486,278 individuals meet their basic nutritional needs.<sup>1</sup> In other words, nearly 1 in 3 individuals rely on SNAP to buy the food they need to survive and feed their families. The proposed rule will make it harder for these individuals to stay healthy and work.

In attempts to decrease SNAP participation, the proposed rule abolishes states' discretion to request waivers from the work requirement, as Pennsylvania has done for the last 20 years, under both Democratic and Republican governors.

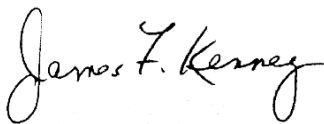
Imposing a general, arbitrary unemployment floor ignores the job prospect reality for many adults. In Philadelphia we are making significant new investments in our public schools to tackle longstanding systemic issues that have contributed to poverty. But it is shortsighted to penalize adults who are struggling today with Low education levels, stigmatization of being formerly incarcerated, limited English proficiency, and health challenges that make keeping a job difficult. The majority of SNAP recipients who are able to work do work and would prefer to work more hours if they could.

The proposed changes not only make it more difficult for struggling Philadelphians to access food, but also damage the local economy. Nearly 40,000 Philadelphians could potentially lose their SNAP benefits. Every SNAP disenrollment results in an annual loss of 1,500 dollars in the Philadelphia economy. Additionally, SNAP benefits empower recipients with significant purchasing power, especially in low-income neighborhoods. Massive disenrollment of SNAP could financially devastate over 1,800 Electronic Benefit Transfer (EBT) retailers who serve residents in Philadelphia. The dollars not spent in Philadelphia grocery stores have the potential to create a ripple effect, exacerbating poverty in Philadelphia.

The rule's impact extends beyond the adults officially targeted by the rule, also affecting children or families they may support of live with. We expect we could see more individuals needing help from our homeless and child welfare systems.

SNAP is critical for supporting Philadelphians across the city. The proposed rule would punish people who are already facing economic hardship, intensify poverty, and stifle the economy. I strongly urge USDA to withdraw this proposal and advance policies that would help create jobs and increase food security for all Philadelphians.

Sincerely,

A handwritten signature in black ink that reads "James F. Kenney". The signature is written in a cursive, flowing style.

James F. Kenney  
Mayor

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<sup>1</sup> Fisher, Kathy. "Overview—Proposed SNAP Time Limit Rule." Food Policy Advisory Committee (FPAC) General Meeting, February 6, 2019.