



CITY OF PHILADELPHIA

Office of the Managing Director
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April 1, 2019

Certification Policy Branch
SNAP Program Development Division
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 Certification Policy Branch:

I am writing on behalf of the City of Philadelphia's Office of the Managing Director of Health and Human Services (HHS) to express 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. Although USDA intends to "improve employment outcomes and economic independence," this short-sighted policy change will harm thousands of vulnerable Philadelphians by failing to account for the structural barriers to employment that they face.

The City of Philadelphia's Office of the Deputy Managing Director (MDO) of Health and Human Services serves our most vulnerable residents, including domestic violence survivors, people experiencing homelessness, individuals recovering from Substance Use Disorder, returning citizens, individuals with disabilities, and low-income Philadelphians, among others. We provide administrative oversight and promote cross-system collaboration among our five departments: the Mayor's Office of Community Empowerment and Opportunity (CEO), Department of Behavioral Health and Intellectual disAbility Services (DBHIDS), Department of Human Services (DHS), Office of Homeless Services (OHS), and the Philadelphia Department of Health (PDPH). Philadelphia's Mayor Jim Kenney and each of our five departments submitted comments opposing the proposed changes to the SNAP program. HHS wholeheartedly supports the concerns voiced in each comment and would like to provide additional insight about the detrimental impacts of the proposed rule on vulnerable populations in Philadelphia.

Research consistently demonstrates the health benefits SNAP provides to vulnerable children, adults, and seniors. In Philadelphia, SNAP helps nearly 1 in 3 residents, affecting as many as 486,278 individuals as of December 2018.ⁱ By providing nutritional assistance to vulnerable and low-income individuals and families, the program alleviates poverty, reduces food insecurity, protects against obesity, improves dietary intake, improves health outcomes, reduces health care utilization and costs, and boosts learning and development.ⁱⁱ The proposed rule will decrease SNAP participation, which will exacerbate food insecurity in Philadelphia and deepen health and nutrition disparities for vulnerable populations.

Currently, federal law limits SNAP benefits for childless unemployed and underemployed adults ages 18-50 (except for those who are exempt) to just three months out of every three years unless they meet educational or work requirements. Although this rule is stringent, states fortunately can request a waiver of the time limits for areas within states that either have unemployment rates greater than ten percent or have "insufficient jobs." The proposed SNAP rule strives to abolish states' flexibility and instead requires an area's unemployment rate to be at least 7% for a recent 24-month period to qualify for the waiver.

This draconian rule will cause the majority of ABAWDS to lose their SNAP benefits. By the USDA's own estimation, 90% of ABAWDS would live in non-waived areas if the unemployment criteria are changed to 7%. Of the 59 counties in Pennsylvania that are currently waived, 49 counties, including Philadelphia County, will no longer qualify under the proposed rule. Nearly 40,000 Philadelphians could potentially lose their SNAP benefits. A blanket unemployment floor ignores the realities of the job market for our most vulnerable residents.

Vulnerable individuals struggle to obtain and retain adequate employment; a three month time limit does not change this. They face unique obstacles to meeting the daily requirements of work, such as gaps in their employment history, low literacy, or mental illness. For the minority who can overcome such difficulties, the jobs that are available are often only seasonal or part-time, neither of which provide enough hours to meet the strict SNAP requirements. Various studies suggest that almost one-third of individuals experiencing homelessness work part-time,ⁱⁱⁱ dispelling the misconception suggested by the proposed rule that these individuals lack the motivation to work.

While the USDA claims to promote economic self-sufficiency, the proposed changes to SNAP underestimate and ignore the significant structural barriers to employment faced by the Philadelphians we serve. For example, formerly incarcerated individuals face employment discrimination for their criminal background: they are called back for jobs at half the rate of those who do not have a record.^{iv} People in recovery from Substance Use Disorder encounter prejudice from employers and the public at large. In fact, a 2014 Johns Hopkins' study finds that 64 percent of a nationally representative sample believed that employers should be able to deny employment to people with a drug addiction.^v In Philadelphia, individuals who do not have secure housing are also much less likely to be employed, even when they have a desire to work.^{vi} Nationally, staff at the Chronic Homelessness Employment Technical Assistance Center reported feeling "frequently challenged by pervasive negative stereotypes when approaching employers about hiring qualified homeless job seekers."^{vii} Clearly, societal stigmatization of vulnerable populations hinders their job prospects.

Although the proposed rule is not intended to affect children and youth, it will. While the SNAP time limits apply to childless adults, the low-income populations we serve sometimes resort to complex living and caregiving arrangements to offer support to children. For example, many extended families support children in extremely dire financial straits. As documented by a 2016 report from the Pew Charitable Trusts, the most financially precarious households rely on help from other households to make ends meet^{viii}; the ABAWDs at risk by this proposed rule may comprise critical support systems for children and youth. Restrictions on SNAP will have ripple effects on those who are most economically vulnerable, including children. Additionally, many children in Philadelphia who have been impacted by the opioid crisis depend on the informal care of grandparents or other relatives. These caretakers are "childless" under USDA policy, but nonetheless still rely on SNAP.^{ix} Furthermore, youth aging out of the foster care system face their own unique set of barriers to fulfilling the prerequisites of many jobs, such as obtaining a high school diploma, getting a driver's license, and maintaining a stable housing situation. A 2014 national survey of youth aging out of the foster care system showed that 44% did not have a high school diploma or GED.^x Even though children are absent from the language of the proposed changes to SNAP, they will inevitably be impacted by the proposed rule.

Stricter work requirements will negatively impact even those individuals who qualify for exemption. Changes to SNAP will create confusion and result in backlogs and disenrollment of otherwise qualified individuals. The policy change further shifts the burden of proof on ABAWDs to demonstrate that they are exempt from work requirements. A person who meets the standards for exemption can lose their SNAP benefits if they do not follow procedure and submit the required paperwork on time. In the case of domestic violence survivors, for example, few benefits caseworkers screen for domestic violence. When they do, survivors must seek out supporting documentation in a process that can be time-consuming and may even put them in harm's way or re-traumatize them. The proposed changes to SNAP have ramifications even for those who should be exempt.

The notion that restricted access to food assistance will boost labor force participation is illogical. Hunger is a hurdle—not a leg up—to employment. Ultimately, the proposed changes to SNAP will impede the self-sufficiency and empowerment of the Philadelphians we serve. SNAP is a vital resource for all people who receive it, especially

for people who face exclusion, stigma, and barriers to full participation in our communities. When basic needs like food security are met, individuals can thrive and contribute to the world around them. Therefore, we urge you to rescind the proposed changes to SNAP and to promote policies that facilitate, not impede, food security among the most vulnerable people in our communities.

Sincerely,



Eva Gladstein
Deputy Managing Director for Health and Human Services

ⁱ Food Policy Advisory Committee General Meeting, January 18, 2018.

ⁱⁱ Christian A. Gregory and Deb Partha, "Does SNAP Improve your Health?" *Food Policy* 50 (2015): 11-19; Heather Hartline-Grafton, *SNAP and Public Health: The Role of the Supplemental Nutrition Assistance Program in Improving the Health and Well-Being of Americans*, Washington, DC: Food Research & Action Center, 2013; Cindy W. Leung, Elissa S. Epel, Walter C. Willett, Eric B. Rimm, & Barbara A. Laraia, "Household Food Insecurity Is Positively Associated with Depression among Low-Income Supplemental Nutrition Assistance Program Participants and Income-Eligible Nonparticipants" *Journal of Nutrition*, 145 no. 3 (2015): 622-627; James Mabli and Julie Worthington, "Supplemental Nutrition Assistance Program Participation and Child Food Security," *Pediatrics*, 133, no. 4 (2014): 1-10; Victoria Mayer, Kevin McDonough, Hilary Seligman, Nandita Mitra & Judith A. Long, "Food Insecurity, Coping Strategies and Glucose Control in Low-Income Patients with Diabetes," *Public Health Nutrition* 19, no. 6 (2016): 1103-1111; Mark Nord, "How Much Does the Supplemental Nutrition Assistance Program Alleviate Food Insecurity? Evidence from Recent Programme Leavers," *Public Health Nutrition*, 15, no. 5 (2012): 811-817; Caroline Ratcliffe, Signe-Mary McKernan and Sisi Zhang, "How Much does the Supplemental Nutrition Assistance Program Reduce Food Insecurity?" *American Journal of Agricultural Economics*, 93, no. 4 (2011): 1082-1098.

ⁱⁱⁱ *Ibid*; "Homelessness and Hiring: Employer Perspectives," U.S. Dep't Housing & Urb. Dev. 3 (2013), <https://www.hudexchange.info/resource/1037/hud-employment-lecture-6-homeless-and-hiring-employer-perspectives/>

^{iv} Devah Pager, Bruce Western, and Naomi Sugie, "Sequencing Disadvantage: Barriers to Employment Facing Young Black and White Men with Criminal Records," *The Annals of the American Academy of Political and Social Science*, 623, no. 1 (2009): 195-213.

^v Colleen L. Barry, Emma E. McGinty, Bernice Pescosolido and Howard H. Goldman, "Stigma, Discrimination, Treatment Effectiveness, and Policy: Public Views about Drug Addiction and Mental Illness," *Psychiatric Services* 65, no.10 (2014): 1269-72; <https://www.jhsph.edu/news/news-releases/2014/study-public-feels-more-negative-toward-people-with-drug-addiction-than-those-with-mental-illness.html>.

^{vi} Office of Homeless Services, City of Philadelphia, raw data.

^{vii} Sarah Golabek-Goldman, "Ban the Address: Combating Employment Discrimination against the Homeless," *Yale Law Journal*, 126 (2016): 1788-1868.

^{viii} The Pew Charitable Trusts, "Extended Family Support and Household Balance Sheets: Getting by with a little help from friends and relatives," March 2016, https://www.pewtrusts.org/-/media/assets/2016/03/fsm_kinshipbrief.pdf

^x Generations United, “In Loving Arms: The Protective Role of Grandparents and Other Relatives in Raising Children Exposed to Trauma,” 2017.

* Megan Martin, Shadi Houshyar, Alexandra Citrin, DeQuendre Neeley-Bertrand, DeQuendre and Raquan Wedderburn, “Supporting Youth Aging Out of Foster Care through SNAP,” The Center for the Study of Social Policy, 2014, <https://www.cssp.org/policy/2016/supporting-youth-aging-out-of-foster-care-through-SNAP.pdf>.