



Office of Domestic Violence Strategies

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

April 1, 2019

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 Domestic Violence Strategies to express our strong opposition to the USDA's Proposed Rulemaking on SNAP requirements and services for Able-Bodied Adults Without Dependents (ABAWDs) published on February 1st, 2019. Mayor Kenney created our office in 2016 to combat the devastatingly widespread problem of domestic violence in Philadelphia. We work to ensure that all Health and Human services agencies are equipped to respond to domestic violence and to connect survivors with the resources they need for safety and healing. The proposed changes to work requirements and time limits would further hinder survivors from the ability to seek safety and economic stability.

SNAP could be the difference between staying trapped in an abusive relationship or seeking safety. In Philadelphia, 1 in 3 residents receive SNAP benefits, many of whom are female and who are also experiencing domestic violence. According to a 2014 study in Philadelphia, women experiencing intimate partner violence face significantly higher food insecurity than women who are not being victimized.¹ Many domestic violence survivors struggle with obtaining and maintaining jobs due to ongoing abuse or harassment by their abuser, ruined credit/rental histories, needing time off to attend court hearings and short and long-term emotional traumas. One advocate stated, "SNAP is a life-line for domestic violence victims. Most DV clients I have worked with leave only with the clothes on their backs and whatever they can carry, [and] SNAP provides one of life's necessities without which they would return to a very bad situation. It is an essential program that victims could not do without".²

The proposed changes would pose even more barriers for survivors enrolling in SNAP. Although some states, including Pennsylvania, waive certain SNAP requirements for domestic violence survivors, the waiver policy creates barriers. Most notably, few case workers screen for domestic violence and seeking a

¹ Chilton, M., Rabinowich, J., & Woolf, N. (2014). Very low food security in the USA is linked with exposure to violence. *Public Health Nutrition*, 17(1), 73-82. Doi:10.1017/S1268980013000281
https://www.cambridge.org/core/services/aop-cambridge-core/content/view/A4BE86D1E653AC22166F4F4BC35FD91C/S1368980013000281a.pdf/very_low_food_security_in_the_usa_is_linked_with_exposure_to_violence.pdf.

² Goodman, Shaina. (2018). The Difference Between Surviving and Not Surviving: Public Benefits Programs and Domestic and Sexual Violence Victims' Economic Security. *National Resource Center on Domestic Violence and Georgetown Law Center on Poverty and Inequality*. https://vawnet.org/sites/default/files/assets/files/2018-01/TheDifferenceBetweenSurvivingandNotSurviving_Jan2018.pdf



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waiver itself requires burdensome paperwork that is difficult for those who are dealing with trauma to complete. For example, survivors are often told they must: follow a safety plan, connect with a support agency, and provide documentation (i.e. protection order, police report, court docs, or letter from a domestic violence/sexual assault program).³ This process does not consider how difficult it may be for survivors to not only access the waiver but also how unsafe it may be to meet these expectations. Stricter time limits and work requirements would only exacerbate these obstacles.

SNAP is critical for setting survivors on a path to safety, stability and economic independence. The proposed changes would delay economic independence and a path to safety for many survivors of domestic violence. I strongly urge you to rescind this proposal and instead advance policies that will reduce barriers for survivors and will ensure the safety and wellbeing of survivors of domestic violence in Philadelphia.

Sincerely,

Azucena Ugarte
Director, Office of Domestic Violence Strategies
City of Philadelphia

³ Ibid.