

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 Immigrant Affairs (OIA) to express our 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. While the proposed rule purports to foster self-sufficiency, it harms immigrant communities by exacerbating the existing challenges they face in securing employment.

The mission of OIA is to promote the well-being of Philadelphia's immigrant communities, who represent nearly 15 percent of all city residents and 19 percent of workers.ⁱ Several categories of immigrants are eligible for SNAP, including legal permanent residents, refugees and asylum seekers, and survivors of trafficking. SNAP supports the self-sufficiency and health of Philadelphia's immigrant population and provides vital assistance for 1 in 4 foreign-born households in Philadelphia.ⁱⁱ Numerous studies confirm that SNAP reduces food insecurity up to thirty percent,^{iii, iv, v} and improves health outcomes, including physical and mental health.^{vi, vii, viii} The health benefits of SNAP serve as a temporary leg up for immigrants and their families on the path to economic mobility.

According to current federal law, childless adults ages 18 to 50 who are unemployed are restricted to three months of food assistance every three years, unless they fulfill certain educational or work requirements. States are currently able to waive this strict and inhumane policy in areas with unemployment rates greater than ten percent. The proposed SNAP rule impinges on states' flexibility by requiring an area's unemployment rate to be at least seven percent for a recent 24-month period to qualify for the waiver. Installing a blanket unemployment floor does not account for the extraordinary hurdles that immigrants must overcome in the job market.

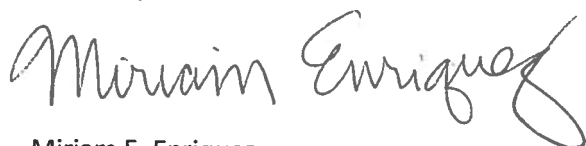
The proposed rule fails to account for the unique barriers that immigrant communities face. Limited English proficiency and discrimination greatly hinder immigrants' ability to find employment, especially within the strict three-month time frame the SNAP rule requires. In 2016, 30% of immigrants in Philadelphia reported speaking English "not well" or "not well at all."^{ix} A US Census Bureau study shows that limited English-speaking proficiency can adversely affect individuals' ability to secure a full-time job.^x Immigrant SNAP recipients are working to improve their English in order to improve their employment prospects. Time limits do not support immigrants' efforts to gain the language skills needed to attain family supporting employment.

Overlapping with issues of language and cultural access, discrimination is a painful reality for many immigrants who come to our country. In a study of African immigrants in Philadelphia, 57% of Francophone and 43% of Anglophone African immigrants reported discrimination on the job because of ethnic background.^{xi} Tightening SNAP work requirements and enforcing strict time limits unfairly penalizes immigrants who have difficulty securing and maintaining jobs through no fault of their own.

Immigrants must navigate and overcome cultural barriers to find work. A report issued by the National Conference of State Legislatures found that even immigrant professionals face policy-level barriers to employment, due to a lack of recognition of foreign credentials on the part of employers, immigrant lack of knowledge about licensing, and limited English proficiency in technical language.^{xii} Other immigrant groups like asylee and refugees often lack access to their original transcript and work documents.^{xiii} These immigrant groups are forced to restart and enter into the American education system before moving into entry-level positions. Some immigrants take significantly lower-paying jobs. Taking food assistance away from Philadelphia's immigrants will not help them find work; instead, it will exacerbate disparities experienced by already vulnerable populations.

Given the right tools and supports, immigrants thrive. SNAP is a valuable tool for success as an immigrant. Further restricting this form of assistance is an unnecessary and unjust plan of action. I urge you to rescind the proposed changes to SNAP and to instead promote policies that will promote food security among all those who are a part of our society, including immigrants.

Sincerely,



Miriam E. Enriquez

ⁱ "Philadelphia's Immigrants: Who They Are and How They Are Changing the City," *The Pew Charitable Trusts*, June 2018, page 13.

ⁱⁱ U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates

ⁱⁱⁱ Leung, C. W., Epel, E. S., Willett, W. C., Rimm, E. B., & Laraia, B. A., "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.

^{iv} Mabli, J., & Worthington, J., "Supplemental Nutrition Assistance Program participation and child food security." *Pediatrics* 133, no. 4, (2014), 1-10.

^v Ratcliffe, C., McKernan, S. M., & Zhang, S. (2011). How much does the Supplemental Nutrition Assistance Program reduce food insecurity? *American Journal of Agricultural Economics*, 93(4), 1082-1098.

^{vi} Nord, M., "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.

^{vii} Hartline-Grafton, H., "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, (2017).

^{viii} Gregory, C. A., & Deb, P., "Does SNAP improve your health?" *Food Policy*, 50, (2015), 11-19.

^{ix} "Philadelphia's Immigrants: Who They Are and How They Are Changing the City," *The Pew Charitable Trusts*, June 2018, page 16.

^x Day, Jennifer Cheeseman and Hyon B. Shin, "How Does Ability to Speak English Affect Earnings," *US Census Bureau*, April 2, 2005,

https://www.census.gov/hhes/socdemo/language/data/acs/PAA_2005_AbilityandEarnings.pdf

^{xi} Kenneth Omollo A. Simbiri, Alice Hausman, Rose O. Wadenya, and Jeffrey Lidicker, "Access Impediments to Health Care and Social Services between Anglophone and Francophone African Immigrants Living in Philadelphia with Respect to HIV/AIDS," *Journal of Immigrant and Minority Health* 12, no. 4 (2010): 569-579.

^{xii}“Barriers to Work: Improving Access to Licensed Occupations for Immigrants with Work Authorization,” *National Conference of State Legislatures*, July 17, 2018, <http://www.ncsl.org/research/labor-and-employment/barriers-to-work-immigrants-with-work-authorization.aspx>.

^{xiii}“Barriers to Work: Improving Access to Licensed Occupations for Immigrants with Work Authorization,” *National Conference of State Legislatures*, July 17, 2018, <http://www.ncsl.org/research/labor-and-employment/barriers-to-work-immigrants-with-work-authorization.aspx>.