



CITY OF PHILADELPHIA

OFFICE OF THE HEALTH COMMISSIONER

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Thomas A. Farley, MD, MPH
Health Commissioner

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 Certification Policy Branch:

We write to raise serious concerns about the US Department of Agriculture (USDA) Proposed Rulemaking on "Supplemental Nutrition Assistance Program: Requirements for Able-Bodied Adults without Dependents (ABAWDs)." Despite the USDA's intent that this rule would "improve employment outcomes and economic independence," the proposed changes mischaracterize the populations the program aims to serve and underestimates the harm to individuals and families these policies would inflict.

The Supplemental Assistance Nutrition Program (SNAP) is a critical program that provides food assistance benefits to those at greatest risk of experiencing hunger or poor nutrition. According to SNAP administrative data, nearly two-thirds of SNAP participants are children, elderly, or individuals who receive disability benefits and are not expected to work. Approximately 35 percent of participants are non-elderly adults who do not meet the strict criteria to receive disability benefits¹. SNAP helps workers, both to supplement low wages and support them when they are between jobs. An extensive body of research illustrates that SNAP has significant short-and long-term benefits linked to reduced food insecurity and poverty, improved health and is a critical short-term support for unemployed workers².

While the Philadelphia Department of Public Health strongly supports helping SNAP participants achieve economic security, the proposed rule would have the opposite effect, resulting in an increased number of individuals losing access to crucially needed nutritional assistance. Many of the individuals that stand

¹ Carlson, Steven, Brynne Keith-Jennings, and Raheem Chaudhry, "SNAP Provides Needed Food Assistance to Millions of People with Disabilities," Center on Budget and Policy Priorities, June 14, 2017, <https://www.cbpp.org/research/food-assistance/snap-provides-needed-food-assistance-to-millions-of-people-with>.

² "Chart Book: SNAP Helps Struggling Families Put Food on the Table," Center on Budget and Policy Priorities, updated February 14, 2018, <https://www.cbpp.org/research/food-assistance/chart-book-snap-helps-struggling-families-put-food-on-the-table>.

to lose food assistance are employed with inconsistent hours or work in seasonal industries. Recent studies show that fewer than two percent of participants, aged 18-49, consistently work fewer than 20 hours per week, and fewer than two percent are continually unemployed. Rather, the majority of SNAP participants fluctuate between working at least 20 hours per week in a given month, to falling short of a consistent 20 hours per work week³.

Furthermore, because of persistent discrimination in hiring practices, immigrants and minority communities are likely to be disproportionately impacted by this proposal. The USDA itself acknowledged the proposed changes "have the potential for disparately impacting certain protected groups due to factors affecting rates of employment of these groups, find[ing] that implementation of mitigation strategies and monitoring by the Civil Rights Division of Food and Nutrition Service will lessen these impacts." However, the proposal does not include any further explanation of potential mitigation strategies or monitoring, making it unlikely either would successfully address the disproportionate impact of increased food insecurity and poverty. This omission is troublesome given the higher rates of food insecurity within minority communities.

The proposed rule change would result in nearly 40,000 Philadelphians losing access to nutrition benefits⁴. The proposal ignores the realities of those who work inconsistent hours, lack access to transportation, live in areas where the economy has been slower to recover or are unable to access employment and training programs.

Households that utilize SNAP benefits suffer from limited economic resources, making it difficult to consistently obtain adequate food. A 2017 USDA study found lower food security is associated with a higher probability of developing or exacerbating a number of chronic diseases, including hypertension, heart disease, cancer, asthma, diabetes, hepatitis, arthritis, stroke, chronic obstructive pulmonary disease (COPD) and kidney disease. The number of chronic conditions for adults in households with low food security is, on average 18 percent higher than for those in high food-secure households. Adults, for example, in households with very low levels of food security are 10.5 percentage points more likely to be diagnosed with hypertension than adults in households with high levels of food security⁵.

In Philadelphia, six of the leading causes of death are related to chronic health conditions - heart disease, cancer, cerebrovascular disease, chronic respiratory disease, diabetes and chronic kidney disease. These conditions often significantly reduce quality of life and life expectancy and lead to disability and high healthcare costs. Working-age individuals with disabilities are three times more likely to live in poverty than working-age adults without disabilities⁶. Thus, the proposed rule changes would disproportionately harm those with disabilities and their families.

Although hunger has decreased in most of the United States over the last six years as a result of reduced unemployment and slightly increased wages, the level of food insecurity in Philadelphia has increased. Over 18.3 percent of the city's population, between 2015-2017, lived in households that were characterized by the federal government as food insecure, meaning they were unable to always afford sufficient food. In contrast, 16.7 percent of Philadelphians, between 2012-2014, were food insecure.⁷

³ Quillian, Lincoln, Devah Pager, Ole Hexel and Arnfinn H. Midtboen. "The Persistence of Racial Discrimination in Hiring." Proceedings of the National Academy of Sciences, September 2017.

⁴ Center on Budget and Policy Priorities. (2019). Impact of ABAWD Waiver Regulation. Unpublished raw data.

⁵ Gregory, et al. "Food Insecurity, Chronic Disease and Health Among Working-Age Adults." 2017

⁶ Vallas, Rebecca, Shawn Fremstad, and Lisa Ekman. "A Fair Shot for Workers with Disabilities." Center for American Progress, 28 January 2015. Available at <https://www.americanprogress.org/issues/poverty/reports/2015/01/28/105520/a-fair-shot-for-workers-with-disabilities/>.

⁷ Hunger Free America, Et al, "Philadelphia Hunger Report, 2018."

Research indicates that childhood access to SNAP is linked to positive health outcomes as well as school achievement, high school graduation and adult economic success. Growing children are especially at risk of experiencing developmental and emotional issues when there is not enough food in their household. Among adolescents, food insecurity is linked to higher rates of anxiety, depression, substance abuse and other mental health disorders⁸. Unfortunately, many children in SNAP households are at risk of being cut off from nutritional assistance because of policies, such as the proposed SNAP rule change, intended to target their parents.

Since the waiver process was formally adopted during the George W. Bush Administration, all efforts to modify SNAP waiver criteria have been within the purview of Congress. The Administration's proposed rule disregards this direction from Congress and removes an important anti-hunger tool from the states. These harmful changes to SNAP were also rejected by a bicameral, bipartisan vote, 87-13 in the Senate and 369-47 in the House of Representatives, for the Agriculture Improvement Act of 2018 (P.L. 115-334), which also explicitly directed the USDA not to make the currently proposed changes.

Given SNAP's record of alleviating poverty and food insecurity and improving health and economic independence, the USDA should work to remove the barriers individuals face in accessing SNAP, rather than restricting access and increasing disparities for families. The proposed changes would exacerbate food insecurity and its negative impact on health. As a result, low-paid workers, minorities, people with disabilities or chronic health conditions, and children will be harmed by the proposed rule change.

It is the mission of the Philadelphia Department of Public Health to protect and promote the health of all Philadelphians and to provide a safety net for our most vulnerable. We therefore oppose the proposed rule.

Sincerely,



Thomas A. Farley, MD, MPH
Health Commissioner

⁸ Grant, Kali, Funke Aderonmu, Sophie Khan, Kaustubh Chahande, Casey Goldvale, Indivar Dutta-Gupta, Aileen Carr and Doug Steiger. "Unworkable and Unwise: Conditioning Access to Programs that Ensure a Basic Foundation for Families on Work Requirements," Center on Poverty and Insecurity, Georgetown Law, February 1, 2019. Available at: <http://www.georgetownpoverty.org/wp-content/uploads/2019/02/Unworkable-Unwise-20190201.pdf>