



CITY OF PHILADELPHIA

Cynthia F. Figueroa
Commissioner
Philadelphia Department of
Human Services

April 1, 2019

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

Re: Federal Register Number 0584-AE57

Dear Legislative Committee:

The Philadelphia Department of Human Services submits these comments on the 2019 proposed regulations to the Supplemental Nutrition Assistance Program's (SNAP) benefits for able-bodied adults without dependents (ABAWD). We oppose the changes and offer the comments below in response to the Department of Agriculture's (the Department) proposal regarding the effect of statewide waivers given geographic size, population and other factors.

A. About the Philadelphia Department of Human Services

Pennsylvania's child welfare and juvenile justice systems are county-administered and state supervised. The Philadelphia Department of Human Services is Philadelphia County's title IV-E, child welfare and juvenile justice agency. Our mission is to provide and promote safety, permanency, and well-being for children and youth who are at risk of abuse, neglect, and delinquency.

Our primary service areas include prevention, foster care, adoptions, and juvenile justice. We work with families to safely care for children in their own home through our prevention practices. When allegations of abuse or neglect are made, our agency works to ensure children's safety and well-being through our community-based model to help achieve permanency. If it is not possible for a child or youth to return home, many of our resource parents choose to adopt the children who are in their care. Additionally, for youth involved in the justice system, we offer programs to ensure their success while in our custody.

B. Comments on the proposed regulation

As the population in the child welfare system shifts and an increasing number of older youth prepare to exit care, the Department's proposed regulation will have an adverse effect on these vulnerable youth who are entering into adulthood and meet the criteria of ABAWD.

Under the projected changes to SNAP, youth who face unique impediments to employment will lose critical food assistance. It's widely known that there is a significant likelihood that youth exiting care or those who were formerly in care may experience homelessness or may be unable to pursue and successfully complete post-secondary educational and employment opportunities. In a 2014 report by the Department of Housing and Urban Development, up to 50% of youth exiting care experienced residential instability, in part, because their income was and continues to be insufficient to maintain affordable housing.¹ According to a national survey of youth aging out of care, almost 44% of the respondents had not earned a high school diploma or GED.² For many older youth who meet the ABAWD requirements, they will confront food insecurity because they lack stable housing and employment. Ultimately, this reality will undermine the Department's goal of encouraging self-sufficiency through the proposed changes.

¹ U.S. Dep't of Housing and Urban Development, Office of Policy Development and Research, *Housing for Youth Aging Out of Care*, 4-5 (2014), available at https://www.huduser.gov/portal/publications/pdf/youth_hsg_main_report.pdf

² Melanie Meisenheimer, *Supporting Youth Aging Out of Foster Care through SNAP*, 3 (2016) available at <https://cssp.org/wp-content/uploads/2018/08/supporting-youth-aging-out-of-foster-care-through-SNAP.pdf>.

C. Conclusion

The Philadelphia Department of Human Services is committed to providing appropriate supports and services to older youth, but we recognize that what we offer this vulnerable population is both time and resource limited. Therefore, we request that the Department reconsider its proposed regulation and thoroughly examine the effect that it imposes on young people whose access to nutrition will be severely impacted.

Sincerely,

A handwritten signature in blue ink, appearing to read "Cynthia F. Figueroa".

Cynthia F. Figueroa

Commissioner