



CITY OF PHILADELPHIA

Office of Homeless Services
1401 JFK Boulevard – 10th flr.
Philadelphia, PA 19102
Ph: (215) 686-7106
Fax: (215) 686-7187
Email: Liz.Hersh@phila.gov

Elizabeth G. Hersh
Director of the Office of Supportive Housing

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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:

Thank you for the opportunity to comment in opposition to USDA's Proposed Rule on Requirements for Able-Bodied Adults Without Dependents (ABAWDs). The proposed changes would cause serious harm to people at risk of, experiencing, or transitioning out of homelessness in Philadelphia, our community and the nation.

The mission of the City of Philadelphia Office of Homeless Services is to provide the leadership, coordination, planning and mobilization of resources to make homelessness rare, brief and non-recurring in Philadelphia. Homeless Services works collaboratively with more than 60 mostly nonprofit, homeless housing and service providers that, combined with city, state and federal governmental partners, comprise Philadelphia's homeless service system. The system serves both people who are experiencing homelessness and those at imminent risk of homelessness through homelessness prevention and diversion; emergency, transitional, permanent supportive housing, and rapid re-housing; case management, supportive services; emergency response, service days (cleanup of encampments); and food and commodity distribution to contracted emergency housing facilities and soup kitchens.

We strongly oppose the proposed changes to the SNAP regulations, as they would expose the extremely low-income adults experiencing, at risk of, and transitioning out of homelessness whom we serve—as well as children who may be relying on them for help meeting basic needs—to the harm of the SNAP time-limit. Taking food off the table is no way to help individuals achieve economic mobility.

By the Administration's own calculations, this proposed rule would take food away from 755,000 low-income Americans, cutting food benefits by \$15 billion over ten years. The Department provides little analysis to explain its conclusions about the impacts the changes would have on individuals and population groups nor of realistic plans to avert harm from those changes. Furthermore, it flies in the face of Congressional intent.

Congress Explicitly Rejected this Proposal

Congress just concluded a review and reauthorization of SNAP in the Agriculture Improvement Act of 2018 and considered, but did not make, the changes proposed by the Administration. As stated in the Conference Report (H. Rept. 115-1072):

The Managers acknowledge that neither the Department nor Congress can enumerate every ABAWD's situation as it relates to possible exemption from the time limit, and subsequently, the work requirement. States will maintain the ability to exempt...consistent with current law....The Managers also acknowledge that ***waivers from the ABAWD time limit are necessary*** in times of recession and in areas with labor surpluses or higher rates of unemployment. ***The Managers intend to maintain the practice that bestows authority on the State agency responsible for administering SNAP to determine when and how waiver requests for ABAWDs are submitted***...(emphasis ours).

With this proposed rule, the USDA disregards Congressional intent to reject the Administration's proposal, which is especially objectionable given that the preamble to the proposed rule itself states that "The Department is committed to implementing SNAP as Congress intended" (84 FY 981).

Philadelphia Stakeholders Committed to Collaboration, like Federal Government

The community of stakeholders invested in Philadelphia's homeless assistance system has rallied around a shared vision for transforming our local response to homelessness, which we outline in *Roadmap to Homes*¹, our new 5-year Strategic Plan. We have agreed to align our efforts to achieve our goals and to share accountability for action to address the needs of our city's residents. To support food access needs, the Office of Homeless Services serves as the co-backbone organization to the Philadelphia Food Access Collaborative, which seeks to build effective, partnership-based solutions to address the challenges of reducing hunger and to better serve the needs of vulnerable individuals who seek emergency congregate meals by strengthening connections to key social services.

SNAP is one of the key mainstream resources available to help the population whom we serve stabilize their lives. Losing access would have serious negative impacts on the lives of many of our program participants and would be inconsistent with HUD's mission and goals. As you know, HUD's Office of Special Needs Assistance Programs, which provides the vast majority of

¹ City of Philadelphia Office of Homeless Services, *Roadmap to Homes: Philadelphia's Five Year Strategic Plan for the Homeless Assistance System*, September 2018, <http://philadelphiaofficeofhomelesservices.org/wp-content/uploads/2018/11/ohs-2018-road-map-strategic-plan.pdf>.

Federal funding received by our Office, “supports the nationwide commitment to ending homelessness by providing funding opportunities to...quickly rehouse homeless individuals and families.” Through its homeless assistance grants, HUD “advocates self-sufficiency and promotes the effective utilization of *mainstream resources* available to individuals and families experiencing homelessness” (emphasis ours).

SNAP Matters

SNAP plays a critical role in addressing hunger and food insecurity in our community. It is the first line of defense against hunger for low-income residents.

Research shows that the Federal Nutrition Programs, including SNAP, are profoundly important programs with well-documented health and other benefits to vulnerable children, adults, and seniors. In Pennsylvania, the Supplemental Nutrition Assistance Program helps more than 1 in 7 citizens afford food for a basic diet. In Philadelphia, SNAP helps nearly 1 in 3 residents (486,278 individuals as of December 2018). 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. The proposed rule will serve to decrease participation in SNAP, which will serve to widen health and nutrition disparities related to socioeconomics and race-ethnicity.

For people experiencing homelessness in Philadelphia, SNAP provides a crucial resource. During FY18, Philadelphia homeless services providers served more than 14,100 people experiencing homelessness in temporary and permanent housing programs. Those people comprised around 8,805 households², of which two-thirds were receiving SNAP benefits at program entry.

Type of Homeless Assistance Program	Households Served in FY2018	% households served receiving SNAP benefits at program entry
Temporary housing (year-round emergency shelter, safe havens, transitional housing)	5,590	60%
Rapid Re-Housing	979	70%
Permanent Supportive Housing	2,236	79%
TOTAL	8,805	66%

For people in immediate housing crisis, the homeless assistance system operates programs that offer temporary places to stay: emergency shelters; transitional housing, temporary supportive housing for subpopulations who may need extra support to establish themselves independently; and safe havens, facilities with overnight capacity of 25 or fewer persons that target hard-to-serve persons with mental illness coming from the streets who have previously

² All numbers referring to people engaged in Philadelphia’s homeless assistance system come from internal OHS calculations based on Homeless Management Information System data for FY2018, unless otherwise cited.

been unable or unwilling to participate in supportive services. As shown in the table above, of the 5,590 households served in the system's temporary programs in FY18, approximately 58% were receiving SNAP benefits at entry to the program. More than 500 households were both receiving SNAP benefits and earning some income when they entered temporary housing, but still could not make ends meet to get a permanent roof over their heads.

The good work of Philadelphia's emergency meal providers suggests one explanation for such a substantial proportion of participant households entering with SNAP assistance. Emergency meal providers served nearly 910,000 meals at 39 sites in FY2017, with most meal providers partnering with other organizations to offer services, which can include benefits enrollment.³ During FY18, the OHS Food Access Unit provided funding, food, and capacity building support to 8 meal sites, which provided approximately 29,682 free meals to vulnerable individuals.⁴ Additionally, the Philadelphia Food Access Collaborative facilitated new partnerships at these emergency meal sites to provide services to guests such as benefits screening and enrollment. Thus, if these people had been accessing emergency meals in an effort to put all of their resources towards maintaining their housing, they could have found support with SNAP enrollment before reaching the point of needing to access temporary housing.

The system also includes housing programs that provide long-term support for people who have previously been experiencing homelessness, and SNAP plays a critical role for participants in those programs. Because households must include a person with a disability to qualify for Permanent Supportive Housing programs, long-term supports for the ABAWD population come nearly exclusively through the Rapid Re-Housing Program (RRH). RRH subsidies provide time-limited financial assistance to make housing affordable, paired with targeted services to support housing stability. It is essential that Rapid Re-Housing participants establish community connections and supports that will enable them to sustain their housing for the long term, which SNAP benefits help them to do. As shown above, a full 70% of households entering Philadelphia RRH programs during FY18 came in with SNAP benefits, allowing them to focus their energies on securing other resources, including employment, from the get-go.

The Existing SNAP Time Limit is Counterproductive and Harms Vulnerable Individuals

Federal law limits SNAP eligibility for childless unemployed and underemployed adults age 18-50 to just three months out of every three years unless they are able to prove they have obtained and maintained an average of 20 hours a week of employment. However, these requirements are often untenable for so-called Able-Bodied Adults Without Dependents (ABAWDs) who face structural barriers to employment and/or sufficient, regular work hours.

Irrespective of their household type, people in crisis need time to stabilize their lives. In the case of people experiencing homelessness, the basic need for a place to live must be met before people can focus on addressing challenges that led to their homelessness with solutions like stable employment. At entry to emergency shelter and safe haven programs, slightly fewer

³ Philadelphia Food Access Collaborative, 2017 Data Dashboard, June 2018, <http://philadelphiaofficeofhomelesservices.org/wp-content/uploads/2018/09/Hunger-Dashboard-June-2018.pdf>

⁴ City of Philadelphia Office of Homeless Services Food Access Unit, as-yet unpublished data, 2019.

than half of households without children in which the head of household does not have a disabling condition receive SNAP benefits. (We will refer to these households as ABAWDs, though we do not generally use that term.) Of those ABAWDs with SNAP who are entered an emergency housing situation in FY18, only 14% had employment income.

Our data suggest that once an immediate crisis is addressed with shelter, some people are able to begin tackling the barriers, such as lack of employment, that stand in the way of their obtaining housing. As noted above, the vast majority of members of this subpopulation securing long-term housing with the support of homeless assistance participate in Rapid Re-Housing (RRH) programs. Most ABAWDs enter RRH programs from an emergency housing situation. In FY18, 45% of ABAWDs with SNAP also had employment income at RRH program entry, three times the percentage of ABAWDs with SNAP who had employment income at emergency housing entry. This suggests that people find employment while staying in an emergency shelter, even if does not produce enough income to afford market-rate housing options. It aligns with data from 2013 and 2014 showing that the overwhelming majority of SNAP participants who struggle to meet the threshold of 20 hours of work per week are not uninterested in working, but instead are experiencing the consequences of volatility in the low-wage labor market, caregiving duties, or personal health issues.⁵

Ample research suggests that work requirements do not promote increased employment but instead harm health and productivity.⁶ Regarding the latter, USDA's own Economic Research Service analysis of National Health Interview Survey (NHIS) data⁷ shows that:

- Adults in households with lower food security status have elevated probabilities of chronic disease diagnosis.
- Adults in households with very low food security were 15.3 percentage points more likely to have any chronic illness than adults in households with high food security. This is a 40-percent increase in overall prevalence.
- 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.

Despite our best efforts at moving people into stable, long-term housing as quickly as possible, the average length of enrollment in emergency shelter and safe haven programs during FY18 was 176 days, nearly double the time limit imposed upon SNAP recipients. Arbitrarily cutting off assistance harms vulnerable people by denying them food benefits at a time when they most need it – when they lack earned income with which to feed themselves adequately and nutritiously – and does not result in increased employment and earnings.

Area Waivers and Individual Exemptions Provide Ways to Modestly Ameliorate the Harsh Impact of Arbitrary Time Limits

⁵ Lauren Bauer, Diane Whitmore Schanzenbach, and Jay Shambaugh, "Work Requirements and Safety Net Programs," The Hamilton Project, October 2018, http://www.hamiltonproject.org/assets/files/WorkRequirements_EA_web_1010_2.pdf

⁶ Dr. LaDonna Pavetti, "Work Requirements Don't Cut Poverty, Evidence Shows," Center on Budget and Policy Priorities, June 7, 2016, <https://www.cbpp.org/sites/default/files/atoms/files/6-6-16pov3.pdf>

⁷ Christian A. Gregory and Alisha Coleman-Jensen, "Food Insecurity, Chronic Disease, and Health Among Working-Age Adults: A report summary from the Economic Research Service," July 2017, https://www.ers.usda.gov/webdocs/publications/84467/err-235_summary.pdf

Under the law, states have some flexibility to ameliorate the negative impact of the prescribed benefits cutoff. They can request a waiver of the time limit for areas within the state that have 10 percent or higher unemployment rates or, based on other economic indicators, have “insufficient jobs.” Moreover, states have discretion to exempt individuals from the time limit by utilizing a pool of exemptions. The rules governing areas’ eligibility for waivers and individual exemptions have been in place for nearly 20 years. In that time, the waiver rules have proven to be reasonable, transparent, and manageable for states to operationalize.

The proposed rule would make it harder for states to obtain and implement area waivers by eliminating statewide waivers except when a state triggers extended benefits under Unemployment Insurance. It would unduly limit the economic factors considered in assessing an area’s eligibility for a waiver (e.g., by no longer allowing employment to population ratios that demonstrate economic weakness to qualify areas for waivers). It would undermine efficient state implementation of area waivers by limiting their duration to 12 months and delaying their start dates until after USDA processes the request. In addition, the proposed rule would remove states’ ability to use exemptions accumulated prior to the rule’s implementation as well limit the time states’ have to use exemptions they receive in the future.

Proposed Rule Undermining Law’s Safety Valves Should Be Rejected

We strongly oppose the proposed rule that would expose even more people to the arbitrary food cutoff policy by limiting state flexibility regarding area waivers and individual exemptions. In Philadelphia, the rule would subject more than 38,500 adults to the severe limitation on SNAP assistance.

The proposed rule would make it harder for areas with elevated unemployment rates to qualify for waivers of the time limit by adding a 7 percent unemployment rate floor as a condition. It would undercut states’ ability to waive time limits in areas such as Philadelphia, where there are too few jobs accessible to the people who receive SNAP benefits. *Fueling Philadelphia’s Talent Engine*⁸, which guides our citywide workforce strategy, notes that “too many Philadelphians lack the 21st Century workforce skills essential to succeed in today’s economy, including 204,676 adults who are without a high school credential.” Of the 22% of Philadelphia’s population aged 25 to 64 living in poverty, 25% are working, but unable to earn wages sufficient to move ahead. Multiple City agencies are engaged in efforts to strengthen work-related supports for Philadelphians living in poverty.

People experiencing, at imminent risk of, or transitioning out of homelessness require customized services and supports. Most people experiencing homelessness who provided input for the *Roadmap to Homes* expressed a strong desire to get a job – or a higher paying job – to support themselves. This came as no surprise, as most people in the homeless assistance system will need to increase their incomes to pay rent or mortgage payments and remain housed in the long term. But many of these people face numerous barriers to employment.

⁸ City of Philadelphia, *Fueling Philadelphia’s Talent Engine: A Citywide Workforce Strategy*, February 2018, https://www.phila.gov/media/20180205133517/FUELINGPHILADELPHIASTALENTENGINE_FULLSTRATEGY.pdf.

These can include lack of childcare or transportation, gaps in employment history, a criminal record, and low literacy.

The community of stakeholders that shaped Philadelphia's *Roadmap to Homes* identified connecting people to employment and workforce development as one of our top five priorities for the next five years. We are establishing a strategic partnership between the homeless assistance and workforce development systems to draw upon each other's expertise in connecting people experiencing homelessness to pre-employment or employment opportunities. We have begun by working with the nonprofit First Step Staffing, which prepares and places entry-level and semi-skilled workers with local light-industrial employers and supports their success with wrap-around services. OHS has been providing additional support to providers and their participants: completing work readiness assessments, making calls about orientations, working with First Step to schedule orientations at varied locations throughout the City.

For someone for whom First Step employment still presents barriers or who is not ready or not in a position to take on full-time work, we need even more accessible options that help people build skills and connect with work, as so many want to do. Beginning April 1, Philadelphia will have a day-work program providing opportunities to work without traditional workforce-development program requirements. The program design includes enlisting peer specialists, individuals who themselves have serious mental illnesses or histories of substance abuse and are trained to support others. It aims to allow people to see their potential and assign a value to what they're doing, and try to shift how they see themselves psychologically. Participation in low-barrier work may be the first step in an individual's re-entry to the workforce, which might continue with an organization like First Step Staffing — programs that pair employment with supports such as housing, transportation, and job coaching.

In Philadelphia, the nation's poorest large city, we've got all hands on deck to help our community members connect with the employment that so many of them seek. We're tackling the problem from all sides — with many more efforts than we could possibly detail in these comments. From the standpoint of the homeless assistance system, employment plays a central role in long-term housing stability. Connecting people to employment will not only support their ability to maintain their housing, but also help drive economic growth in our city. Moreover, employment also promotes social contact and support, challenges despair, builds self-confidence, and provides economic freedom. We are implementing strategies that will produce positive outcomes for the people we serve.

The Administration's rationale for modifying waiver standards appears similar, referring back to an April 2018 Executive Order that "provided guiding principles for public assistance programs, one of which was to improve employment outcomes and economic independence." Yet, the Administration's proposed rule does not estimate any improvements in health or employment outcomes among the population affected by this rule. USDA merely asserts its expectation that two-thirds of those individuals made newly subject to the time limit "would not meet the requirements for failure to engage meaningfully in work or work training."

SNAP Is the First Line of Defense against Child Food Insecurity

The existing SNAP three-month time limit for ABAWDs purports solely to impact adults who do not have children. In practice, however, low income children and youth also experience harm as a result of this policy. By making it more difficult for states to waive the time limit for low-income individuals facing barriers to employment, the proposed rule will only exacerbate the spillover effect (detailed in the next section) onto vulnerable young people.

Food insecurity remains a major threat to health and wellbeing of 12.5 million children in America.⁹ In 2016, more than 75,000 Philadelphia children, more than one in five children in the city, lived in a household that had uncertain access to enough healthy food.¹⁰ Food insecurity has devastating consequences for children. Without access to healthy food, children suffer negative consequences to their health, education, and development. As the nation's largest federal food assistance program, the Supplemental Nutrition Assistance Program (SNAP) is the first line of defense against child food insecurity. SNAP works efficiently and effectively by providing low-income households with monthly funds specifically designated for food purchases. Beyond its role in fighting food insecurity, SNAP significantly reduces child poverty and helps struggling families to make ends meet: SNAP benefits lifted 1.5 million children out of poverty in 2017 alone.¹¹

The Proposed Changes to State Waiver Flexibilities Will Harm Children

Because SNAP is so important for low-income and food-insecure children, children under the age of 18 and the adults who live with them are technically exempt from the three-month time limit for SNAP. However, the SNAP time-limit for Able Bodied Adults Without Dependents already adversely impacts children and vulnerable youth, even though they are not the intended targets of that policy. Though current rules around the SNAP time-limit explicitly exempt adults who have a dependent child under the age of 18 or live in a household with children under 18, this definition does not account for the complex financial arrangements that low-income families rely on to put food on the table. This proposed rule would exacerbate this problem.

The homeless assistance system is well familiar with complex arrangements, particularly in terms of families' living situations. As members of Philadelphia's Family Service Provider Network (FSPN) will be quick to note, the standard methodology for counting children experiencing homelessness will produce an undercount. This is because many parents will devise countless strategies for keeping their children from entering a shelter, whether they involve the whole family "doubling up" with friends or family or, if that is not possible, finding

⁹ Alisha Coleman-Jensen, Matthew P. Rabbitt, Christian A. Gregory, and Anita Singh, "Household Food Insecurity in the United States in 2017," U.S. Department of Agriculture, September 2018, <https://www.ers.usda.gov/webdocs/publications/90023/err-256.pdf?v=0>

¹⁰ Feeding America, "Map the Meal Gap 2018: Child Food Insecurity in Pennsylvania by County in 2016," https://www.feedingamerica.org/sites/default/files/research/map-the-meal-gap/2016/child/PA_AllCounties_CDs_CFI_2016.pdf

¹¹ Liana Fox, "The Supplemental Poverty Measure: 2017," U.S. Census Bureau, September 2018, <https://www.census.gov/content/dam/Census/library/publications/2017/demo/p60-261.pdf>

similar places for children to stay on a short-term basis. Vulnerable children in our community, those meeting HUD’s definition of homelessness and those who do not, will experience a reduction in important resources that help meet their basic needs, as a result of this rule. This includes:

- **Children whose extended family members provide financial support:** Some children may rely on food, financial assistance, free childcare, or even an occasional place to stay from extended family members, family friends, or a parent’s significant other who are not part of their household unit, who use SNAP to supplement their income. Households that are the most financially precarious are the most likely to rely on such transfers to make ends meet. Considering that financially precarious households are often embedded together within the same networks, they likely received money or assistance from others who were also struggling economically.¹² If so-called Able-Bodied Adults Without Dependents in these networks lose SNAP benefits due to tightened state waiver rules, it would disrupt their ability to lend that crucial assistance to low-income children.
- **Children impacted by the opioid crisis:** Today, more than 2.5 million children are being raised by their grandparents or other relatives, in part because families are dealing with parental alcohol and substance abuse issues, which are growing rapidly due to the opioid epidemic.¹³ Philadelphia has been hard hit, so much so that on October 3, 2018, Mayor Jim Kenney signed an executive order creating an Opioid Emergency Response Group, a special team representing 35 City departments, agencies, and offices, focused on prioritizing work to address the opioid crisis in Philadelphia.¹⁴ The adults who provide informal kinship care for children impacted by substance abuse issues may not do so on a consistent schedule, however. As a result, they may face obstacles in securing an exemption from ABAWD time-limits. If they lose access to SNAP in the face of tightened waiver requirements, the children they care for could experience increased poverty and food insecurity as a result.
- **Youth aging out of foster care and unaccompanied homeless youth:** Youth in foster care and unaccompanied homeless youth disproportionately experience significant barriers to obtaining a high school diploma, entering college, obtaining a driver’s license, accessing health insurance, maintaining housing stability, and obtaining steady employment. SNAP plays a significant role in the health and well-being of youth aging out of care and unaccompanied homeless youth with no support systems. Former foster youth often experience poor nutrition and food insecurity, and SNAP benefits help to

¹² 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

¹³ Generations United, “In Loving Arms: The Protective Role of Grandparents and Other Relatives in Raising Children Exposed to Trauma,” 2017.

¹⁴ Mayor Jim Kenney, Opioid Emergency Response Executive Order, October 3, 2019, <https://www.phila.gov/documents/opioid-emergency-response-executive-order/>

address this problem and increase the likelihood of healthy adult outcomes.¹⁵ However, because former foster youth and unaccompanied homeless youth often meet the definition of an Able-Bodied Adult Without Dependents, they face obstacles accessing this critical assistance and would likely disproportionately suffer under tightened state waiver requirements.

- **Children with non-custodial parents:** Poverty is a troubling reality for both custodial and noncustodial parents (NCPs). The most recent available data from 2015 suggests that some 4.5 million poor and low-income custodial parents who rely on child support payments from NCPs also utilize SNAP to put food on the table for their children.¹⁶ Yet NCPs are often themselves low-income, with 2.1 million living below the poverty line in 2015, and 1.5 million accessing SNAP to supplement their resources to afford child support payments.¹⁷ Because NCPs are not exempt from the ABAWD time-limit, the proposed rule not only threatens them, but their children. An under-employed or unemployed NCP who loses SNAP may need to divert his or her income from child support payments in order to stay afloat financially, which would be particularly devastating given that child support represents more than half of the income of the families in poverty who receive it.¹⁸

Conclusion

We strongly oppose the proposed rule that would expose even more people to the arbitrary SNAP food cutoff policy and harm our community.

Sincerely,



Liz Hersh
Director, City of Philadelphia Office of Homeless Services

¹⁵ 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>

¹⁶ U.S. Census Bureau, "Custodial Mothers and Fathers and Their Child Support: 2015 Current Population Survey," April 2016, Table 4, <https://www2.census.gov/programs-surveys/demo/tables/families/2015/chlds15.pdf>

¹⁷ Ibid. at 7

¹⁸ Heather Hahn, "Navigating Work Requirements in Safety Net Programs: Potential Pathways for Parents," The Urban Institute, January 2019, https://www.urban.org/sites/default/files/publication/99479/navigating_work_requirements_in_safety_net_programs_0.pdf