

April 2, 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 (ABAWDs) RIN 0584-AE57

Dear Certification Policy Branch:

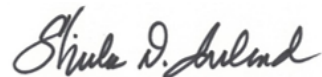
I am writing on behalf of the City of Philadelphia's Office of Workforce Development to express strong opposition to the United States Department of Agriculture's (USDA) Proposed Rule on Supplemental Nutrition Assistance Program (SNAP): Requirements for Able-Bodied Adults Without Dependents (ABAWDs), published in the Federal Register on February 1, 2019. The USDA intends to "improve employment outcomes and economic independence" via a proposal to tighten work requirements and impose strict time limits on SNAP benefits. While shortening the time horizon for connecting individuals to work may appear to alleviate the need for assistance in the short term, it does not encompass the supports we feel are needed for long term success in the workforce.

In February 2018, Philadelphia Mayor Jim Kenney released *Fueling Philadelphia's Talent Engine (FPTE)*, a comprehensive citywide strategy designed to help residents access the education, training, and other supports needed to compete for good jobs, and leverage entry-level employment to build the skills and acquire the credentials needed to advance in their careers. *Fueling Philadelphia's Talent Engine* is a shared strategy, with committed partners from across City government, the School District of Philadelphia, the Chamber of Commerce for Greater Philadelphia, Community College of Philadelphia, Philadelphia Works, Philadelphia Youth Network, employers, institutions of higher education, workforce intermediaries, national and local policy experts, nonprofit organizations, labor unions, and philanthropy.

Fueling Philadelphia's Talent Engine is focused on preventing individuals from cycling in-and-out of poverty by connecting them to the right complement of education, training and supportive services needed to pursue a career pathway that leads to economic self-sufficiency. Experience tells us that expecting SNAP recipients will connect to employment in 90 days dismisses the vagaries of today's labor market and our constituents' ability to compete for jobs that pay family sustaining wages in a tight labor market. In addition, the requirement itself may redirect precious public dollars away from workforce preparation and into policy enforcement measures – this is not a win for anyone involved.

For these reasons, I stand with Mayor Kenney and alongside my colleagues from across the Health and Human Services Cabinet and the Department of Prisons in strongly urging the USDA to withdraw increased work requirements for ABAWD SNAP recipients.

Sincerely,



Sheila Ireland
Executive Director