

The logo for the New York City Bar, featuring the text "NEW YORK CITY BAR" in a serif font, centered between two horizontal blue bars.

NEW YORK
CITY BAR

**COMMITTEE ON
SOCIAL WELFARE**

SUSAN E. WELBER

CHAIR

42 W. 44TH STREET

NEW YORK, NY 10036

Phone: (212) 577-3320

sewelber@gmail.com

June 21, 2019

Steven Banks

Human Resources Administration, Commissioner

150 Greenwich Street

New York, NY 10007

Re: Opposition to the Sudden Closure of the St. Nicholas SNAP Center in Central Harlem

Dear Commissioner Banks,

The Social Welfare Law Committee of the New York City Bar Association, comprising members of the public interest and private bar who care about the impact of social welfare policies enacted at the City, State and federal level, oppose actions that would remove resources from low-income communities without public engagement. On June 28, 2019, the New York City Human Resources Administration (HRA) is scheduled to close a City office that serves low-income New Yorkers who need Supplemental Nutritional Assistance Program (SNAP) benefits, federally-funded benefits that can be used solely for the purchase of food and which serve as a life-line to many low-income families and people with disabilities. The office to be closed is located in Central Harlem on 125th Street and St. Nicholas Avenue. It serves 25,000 households, many of whom reside on the West Side of Manhattan. These cases are all being transferred to the East End Center in East Harlem. Because we believe the closure will have a severe, adverse impact on the lives of low-income New Yorkers and the surrounding community, the Committee urges New York City to discontinue its plans to go through with the closure, and to seek input from affected SNAP recipients and community stakeholders.

I. SNAP CENTERS CONTINUE TO BE AN IMPORTANT CORNERSTONE OF SNAP ACCESS IN NEW YORK CITY

We applaud HRA for using technological advancements that reduce the need for physical access to agency personnel; however, by shrinking the number of physical offices, HRA is at risk of reducing access for some of the most vulnerable individuals and families on the SNAP

caseload, including those who are elderly, are homeless, are unable to read or who do not have consistent access to or sufficient knowledge of internet, phones, and/or computers. All members of the community need access to the agency to apply for benefits and resolve disputes.¹ Vulnerable New Yorkers especially need access when it comes to subsistence SNAP benefits that are used to put food on the table. The consequences of losing access are extremely dire: increased hunger and increased food insecurity.

II. HALTING THE CLOSURE WILL ENABLE THE AGENCY TO ENGAGE WITH THE COMMUNITY

To our knowledge, apart from notifying individuals that their cases would be transferred, HRA's first public announcement of its plans to close the St. Nicholas Center came on June 11, 2019 in the form of an email sent to Community Partners from the HRA Outreach team. No meaningful opportunities for community engagement were made available. Community engagement is essential in decisions that have the potential to significantly impact the lives of New Yorkers, particularly in marginalized and vulnerable communities. The closure of a major service center in a rapidly-gentrifying Black and Latinx neighborhood should only be undertaken after serious engagement with the community and those affected. The individuals and families from across Manhattan who rely on the St. Nicholas Center, and those who provide services to them, should be offered a voice prior to closing a basic service like this. Halting the closure will give the City and affected stakeholders the opportunity to provide meaningful input regarding the impacts of the closure.

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Closure of the St. Nicholas SNAP office has the potential to have far-reaching impacts on the most vulnerable segments of the HRA caseload. For these reasons, the Social Welfare Law Committee calls on HRA to halt the closure and seek community input before proceeding with a decision that could have such a serious impact on marginalized New Yorkers.

Social Welfare Law Committee
Susan Welber, Chair

June 2019

cc: Grace Bonilla, HRA Administrator

¹ While HRA has stated publicly that the “percentage of SNAP applications submitted online increased from 23% in 2013 to 87% in 2019,” these numbers include some in-person applications completed through online kiosks at the centers (with the assistance of HRA staff in those centers). Additionally, beyond applications, there continue to be key functions that are only completed at physical offices, including the client’s ability to request an in-person “conference” with an HRA employee or supervisor to resolve a problem with one’s SNAP benefits.