

Acknowledgements

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SNAP Works: SNAP Work Requirements and Time Limits

By Helly Lee

A core American value is that no one should go hungry in one of the richest nations in the world. However, in 2011, over 50 million Americans lived in food insecure households.¹ The Supplemental Nutrition Assistance Program (SNAP), formerly known as Food Stamps, is a federal anti-hunger program that provides benefits to low-income households for purchasing food. SNAP plays a critical role in addressing food insecurity and alleviating poverty.

SNAP is a Critical Work Support

While most SNAP recipients are in families with children, or include seniors or individuals with disabilities, SNAP is one of the only federal safety net programs available to low-income individuals regardless of family or disability status. SNAP also serves many individuals in working families. The number of SNAP households with employed family members has been rising for more than a decade from about 2 million households in 2000, to about 6.4 million in 2011.² However, many low-income workers—even those who work full-time—do not earn enough to make ends meet.

SNAP supplements the wages of low-income workers and is a critical stabilizer during economic downturns. Increases in SNAP benefits during such downturns provide a fiscal stimulus to the economy. Every \$5 in new SNAP benefits generates as much as \$9 of economic activity.³ When the economy is weak and more people are unemployed or underemployed, poverty increases and so does SNAP

participation. As the economy recovers, SNAP participation decreases. The number of individuals receiving SNAP in an average month grew from 26.3 million in 2007 to over 46 million in 2011 because of the economic recession. This growth is temporary, and economists expect that SNAP participation will decrease and spending on the program will fall to 1995 levels as a share of gross domestic product by 2019.⁴

SNAP Already Has Work Requirements

Most SNAP recipients are either already working (13 percent of all SNAP recipients) or are not expected to work (68 percent) because they: are children or senior citizens; have a disability; care for a family member who is disabled; or care for a child under six years old while another household member is working.⁵ However, SNAP does have several provisions designed to encourage individuals who are not working to enter the workforce.

The most significant of these is a 1996 provision limiting how long non-employed, working-age, and non-disabled adults without children can receive benefits. This population can only access SNAP for three months in a three-year period, unless they are working at least 20 hours per week, participating in a workfare or comparable program to “work off” the food stamp benefit, or participating in another qualifying work activity for at least 20 hours per week (excluding job search). This work requirement is actually more accurately described as a time limit on benefits for workers who cannot find a job and are not participating in a work program.⁶ The population subject to this time limit is sometimes called “able bodied adults without dependents” or “ABAWDs”.

The 1996 law also included an exemption to the ABAWD time limit in geographic areas of high unemployment. States with an unemployment rate above 10 percent or in areas with insufficient jobs may request a waiver to be exempt from the ABAWD time limits. Because of the recession and widespread high unemployment rates, time limits for

ABAWDs were temporarily suspended during the recent recession, but have begun to be reinstated. Currently, 46 states are exempt through September 30, 2013.⁷ The ABAWD time limits are expected to resume in more states once the unemployment rate declines.⁸

Many who are affected by these time limits have little or no income and often don’t qualify for any other safety net benefits because they don’t have children (a common requirement of other safety net programs). Those impacted may include individuals who have lost their jobs, need to access SNAP to make ends meet, and cannot find new employment within the time limit. In FY 2011, 4.486 million SNAP participants were ABAWDs. This represented 10.2 percent of all SNAP participants.⁹

In addition, other SNAP recipients who do not qualify for an exemption based on age, parental responsibilities, or disability¹⁰ may be required to register for work activities, and states may sanction them for failure to participate in assigned activities. However, as discussed below, funding for employment and training activities for SNAP recipients is limited, and states have increasingly chosen to focus these services on voluntary participants.

SNAP Employment and Training Resources are Limited

The Supplemental Nutrition Assistance Program Employment & Training (SNAP E&T) initiative provides federal funding to states, in the form of grants, to help SNAP participants obtain jobs that will reduce their need for SNAP assistance. These grants, which are 100 percent funded by the federal government and do not require a state match, must be used on the planning, implementation, and operation of a state E&T program. States may also be eligible for supplementary funds under a 50 percent reimbursement program if they invest additional state dollars.¹¹

In fiscal year 2012, the Food and Nutrition Service (FNS) allocated a total of \$90 million through the 100 percent grants to states for the planning, implementation, and operation of state SNAP E&T programs.¹² These resources are scarce, particularly given the total number of potential SNAP recipients who are work eligible, including ABAWDs and work registrants. SNAP E&T benefits vary by state and are often not enough to significantly train and assist workers in finding living wage jobs, even if all the funds were targeted to serving individuals subject to work requirements and time limits on SNAP (see **Table 1**).

States may offer SNAP E&T programs to assist individuals who are subject to the ABAWD time limits; however, this is not a requirement. States that commit to serving all ABAWDs at risk of losing benefits can receive an increase in their 100 percent federal funds SNAP E&T allotment. In 2011, only five states committed to serving all ABAWDs.¹³

SNAP E&T funds can cover the costs of operating education and training programs, including basic skills instruction. Federal reimbursements cover a wide range of expenses related to participation in a SNAP E&T component, such as costs for dependent care, transportation, uniforms, and safety equipment necessary in the workforce—although states are not mandated to provide all of these. States *are* required to provide child care and transportation assistance to recipients who need them to participate, and these may not be funded with the 100 percent dollars. Many states have chosen to provide very limited activities in order to minimize the need to allocate state dollars, while others have chosen to provide much more intensive training and supportive services that are more likely to help participants get better jobs that allow them to leave SNAP for good.

States often contract with workforce agencies, basic education providers, community colleges, or nonprofit organizations to operate SNAP E&T

programs. For example, Washington State has operated a successful SNAP E&T program called Basic Food Employment and Training (BFET) since 2005 that is a partnership between the state food assistance program and community colleges and community based organizations (CBOs) that provide participants with support services. In 2012, the BFET program partnered with 12 CBOs and 27 community and technical colleges in 14 counties to provide assessment, case management, job readiness training, basic skills, and vocational training for SNAP recipients. They found that 71 percent of their participants became employed at a median hourly wage of over \$11 per hour.¹⁴

Policies Must Invest in SNAP

SNAP remains a fiscal target and faced deep cuts in both the House and Senate in the most recent efforts to reauthorize the Farm Bill, including repeated efforts by some members of Congress to eliminate the SNAP E&T program altogether.¹⁵ SNAP continues to be an effective safety net in helping low-income households afford food and as a work support program that supplements the resources available for low-wage workers. These proposed cuts would have a detrimental impact on low-income families and individuals, who continue to struggle to make ends meet in the slowly recovering economy where many jobs still do not offer a living wage. In fact, the cuts in the current 2013 House Farm Bill would eliminate food assistance to nearly two million low-income people—primarily working families with children and senior citizens.¹⁶

The ABAWD time limits have not been an issue in recent years due to the high rates of unemployment nationwide and the broad waiver granted to address this. However, as unemployment rates come down, the ABAWD time limits on SNAP will be reinstated and those affected will again be faced with securing employment or risk losing SNAP. While the ideal situation is that ABAWDs are able to secure employment, there are still many barriers for job

seekers in the slowly recovering economy. In addition, few resources are currently available to support the education and training of those who have been unemployed long-term during the recession, or are seeking to develop new skills to re-enter the workforce. While SNAP E&T services may be available in some states to assist ABAWDs facing restrictive time limits on SNAP, many states may not

have the resources available to provide meaningful work activities for these workers. Policies adding additional work requirements do not ensure that SNAP recipients will be able to find living-wage jobs and reduce their need for assistance. What the addition of work requirements will do is remove a critical safety net that keeps millions of low-income people from hunger and poverty.

Table 1: Estimates of 2011 SNAP E&T Funding Compared to Individuals Subject to Work and Time Limit

State/ Territory	E&T 100 percent (2011) ^{a,b}	E&T ABAWD Commitment (2011) ^{a,b}	All E&T 50 percent (2011) ^c	All E&T 50 percent AND State Match (2011) ^d	All E&T ^e	2011 Individuals Subject to Work and Time Limit (ABAWDs) ^f	Estimated Amount Per ABAWD ^g
Alabama	1,338,998	--	175,971	351,942	1,690,940	86,000	\$19.66
Alaska	194,395	--	93,889	187,778	382,173	11,000	\$34.74
Arizona	1,336,348	--	45,000	90,000	1,426,348	106,000	\$13.46
Arkansas	874,363	--	84,109	168,218	1,042,581	48,000	\$21.72
California	6,965,291	--	38,985,009	77,970,018	84,935,309	355,000	\$239.25
Colorado	2,809,870	1,318,638	419,621	839,242	4,967,750	31,000	\$160.25
Connecticut	524,498	--	932,891	1,865,782	2,390,280	46,000	\$51.96
Delaware	141,567	439,560	156,439	312,878	894,005	12,000	\$74.50
District of Columbia	356,746	--	721,477	1,442,954	1,799,700	23,000	\$78.25
Florida	7,826,843	--	154,553	309,106	8,135,949	445,000	\$18.28
Georgia	51,266	--	682	1,364	52,630	183,000	\$0.29
Guam	35,403	--	50,480	100,960	136,363	2,000	\$68.18
Hawaii	230,229	--	428,378	856,756	1,086,985	17,000	\$63.94
Idaho	236,583	--	0	0	236,583	20,000	\$11.83
Illinois	6,698,569	--	3,411,547	6,823,094	13,521,663	200,000	\$67.61
Indiana	1,447,405	--	1,802,413	3,604,826	5,052,231	75,000	\$67.36
Iowa	209,379	--	32,034	64,068	273,447	41,000	\$6.67
Kansas	431,753	--	25,332	50,664	482,417	29,000	\$16.64
Kentucky	8,264	--	0	0	8,264	96,000	\$0.09
Louisiana	1,174,523	--	8,417	16,834	1,191,357	81,000	\$14.71
Maine	284,673	--	42,665	85,330	370,003	30,000	\$12.33
Maryland	955,935	--	47,038	94,076	1,050,011	82,000	\$12.81
Massachusetts	1,308,916	--	1,459,903	2,919,806	4,228,722	72,000	\$58.73
Michigan	3,404,198	--	18,016	36,032	3,440,230	280,000	\$12.29
Minnesota	419,449	--	8,066,319	16,132,638	16,552,087	46,000	\$359.83
Mississippi	49,709	--	0	0	49,709	56,000	\$0.89
Missouri	2,406,055	--	375,900	751,800	3,157,855	98,000	\$32.22
Montana	259,717	--	187,514	375,028	634,745	14,000	\$45.34
Nebraska	244,479	--	1,293	2,586	247,065	11,000	\$22.46
Nevada	709,416	--	39,620	79,240	788,656	34,000	\$23.20

State/ Territory	E&T 100 percent (2011) ^{a,b}	E&T ABAWD Commitment (2011) ^{a,b}	All E&T 50 percent (2011) ^c	All E&T 50 percent AND State Match (2011) ^d	All E&T ^e	2011 Individuals Subject to Work and Time Limit (ABAWDs) ^f	Estimated Amount Per ABAWD ^g
New Hampshire	139,483	--	1,250	2,500	141,983	9,000	\$15.78
New Jersey	485,749	--	15,548,884	31,097,768	31,583,517	66,000	\$478.54
New Mexico	638,267	--	690,932	1,381,864	2,020,131	37,000	\$54.60
New York	8,917,124	12,380,952	87,770,833	175,541,666	196,839,742	244,000	\$806.72
North Carolina	201,672	--	884,242	1,768,484	1,970,156	188,000	\$10.48
North Dakota	94,789	--	14,150	28,300	123,089	4,000	\$30.77
Ohio	2,917,933	--	2,553,978	5,107,956	8,025,889	176,000	\$45.60
Oklahoma	83,798	--	7,663	15,326	99,124	50,000	\$1.98
Oregon	2,077,474	--	507,995	1,015,990	3,093,464	143,000	\$21.63
Pennsylvania	3,248,026	--	26,326,056	52,652,112	55,900,138	139,000	\$402.16
Rhode Island	147,322	--	0	0	147,322	17,000	\$8.67
South Carolina	1,988,995	--	5,361	10,722	1,999,717	101,000	\$19.80
South Dakota	469,981	221,644	50,597	101,194	792,819	8,000	\$99.10
Tennessee	3,141,110	--	401,054	802,108	3,943,218	166,000	\$23.75
Texas	4,893,848	5,494,151	4,495,270	8,990,540	19,378,539	132,000	\$146.81
Utah	1,153,564	--	1,580,820	3,161,640	4,315,204	25,000	\$172.61
Vermont	212,673	--	4,978,674	9,957,348	10,170,021	10,000	\$1,017.00
Virginia	2,137,737	--	1,325,344	2,650,688	4,788,425	77,000	\$62.19
Virgin Islands	50,000	--	32,245	64,490	114,490	1,000	\$114.49
Washington	3,228,366	--	4,388,745	8,777,490	12,005,856	141,000	\$85.15
West Virginia	717,832	--	26,898	53,796	771,628	29,000	\$26.61
Wisconsin	1,461,682	--	3,937,876	7,875,752	9,337,434	88,000	\$106.11
Wyoming	62,844	--	6,255	12,510	75,354	2,000	\$37.68
US	81,405,109	19,854,945	213,301,632	426,603,264	527,863,318	4,486,000	\$117.67

Table 1 Estimates and Assumptions:

a Automated system-generated estimate, FNS data received via email, June 12, 2013.

b Budget analyst generated estimate, FNS data received via email, June 12, 2013.

c This estimate includes the federal 50 percent E&T, 50 percent for E&T Dependent Care, and 50 percent for E&T Transportation, FNS data received via email, June 12, 2013.

d This estimate includes the federal 50 percent E&T, 50 percent for E&T Dependent Care, and 50 percent for E&T Transportation and is multiplied by 2 to account for the State contribution to the 50 percent match, FNS data received via email, June 12, 2013.

e This estimate includes the federal 100 percent E&T funds, ABAWD funds for states who commit to serving ABAWDs, the federal 50 percent E&T, 50 percent for E&T Dependent Care, and 50 percent for E&T Transportation and is multiplied by 2 to account for the State contribution to the 50 percent match, FNS data received via email, June 12, 2013.

f Source: Table B.11, <http://www.fns.usda.gov/sites/default/files/2011Characteristics.pdf>.

g This estimate includes the federal 100 percent E&T funds, ABAWD funds for states who commit to serving ABAWDs, all federal 50 percent funds and the estimated state match and is divided by the number of individuals on SNAP subject to work and time limits. This estimate assumes the amount of SNAP E&T that would be available per individual subject to work and time limits. As noted previously, states may offer SNAP E&T programs to assist individuals subject to work and time limits; however, it is not required of states to do so. This breakdown is simply to show the varying and limited resources available compared to the number of individuals subject to work and time limits and does not imply that all SNAP E&T funds were spent only on this population or that this amount was spent on ABAWDs. In fact, in 2011, over 2.8 million work registrants participated in SNAP E&T. Source: Table A.25, <http://www.fns.usda.gov/sites/default/files/2011Characteristics.pdf>.

¹ Alisha Coleman-Jensen, Mark Nord, Margaret Andrews, Steven Carlson, "Household Food Security in the United States in 2011," USDA, September 2012, p.16, <http://www.ers.usda.gov/media/884525/err141.pdf>.

² Dorothy Rosenbaum, *The Relationship Between SNAP and Work Among Low-Income Households*, Center on Budget and Policy Priorities, January 2013, p.12, <http://www.cbpp.org/files/1-29-13fa.pdf>.

³ USDA, <http://www.ers.usda.gov/topics/food-nutrition-assistance/supplemental-nutrition-assistance-program-%28snap%29/economic-linkages.aspx#.Ucm9NJH3N9s>.

⁴ "Chart Book: SNAP Helps Struggling Families Put Food on the Table," Center on Budget and Policy Priorities, March 28, 2013, <http://www.cbpp.org/cms/?fa=view&id=3744#part1>.

⁵ Dorothy Rosenbaum, *The Relationship Between SNAP and Work Among Low-Income Households*, Center on Budget and Policy Priorities, January 2013, p.10, <http://www.cbpp.org/files/1-29-13fa.pdf>.

⁶ Dorothy Rosenbaum, *The Relationship Between SNAP and Work Among Low-Income Households*, Center on Budget and Policy Priorities, January 2013, p.30, <http://www.cbpp.org/cms/?fa=view&id=3894>.

⁷ Lizbeth Silberman, "Memo: Supplemental Nutrition Assistance Program (SNAP) - Able Bodied Adults Without Dependents Waivers for Fiscal Year 2013," United States Department of Agriculture, March 21, 2012, <http://www.clasp.org/admin/site/publications/files/USDA-ABAWD-2013-Trigger-Notice-Memo.pdf>

⁸ Lizbeth Silberman, "Memo: Supplemental Nutrition Assistance Program (SNAP) - Able Bodied Adults Without Dependents Waivers for Fiscal Year 2013," United States Department of Agriculture, March 21, 2012, <http://www.clasp.org/admin/site/publications/files/USDA-ABAWD-2013-Trigger-Notice-Memo.pdf>.

⁹ Mark Strayer, Esa Eslami, and Joshua Leftin, *Characteristics of Supplemental Nutrition Assistance Program Households: Fiscal Year 2011*, Food and Nutrition Service, United States Department of Agriculture, November 2012, Table 3.4, <http://www.fns.usda.gov/sites/default/files/2011Characteristics.pdf>.

¹⁰ Individuals are exempt from the ABAWD provision if they are under 18 or over 50 years of age; responsible for the care of a child or incapacitated household member; medically certified as physically or mentally unfit for employment, pregnant; or already exempt from the work requirements of the Food Stamp Act. "Chart Book: SNAP Helps Struggling Families Put Food on the Table," Center on Budget and Policy Priorities, March 28, 2013, <http://www.cbpp.org/cms/?fa=view&id=3744#part1>.

¹¹ There are two kinds of 50 percent reimbursement that a state can claim. The first is a 50 percent reimbursement for additional administrative costs and the second is a 50 percent reimbursement state agencies can claim to reimburse participants for allowable activities such as dependent care or transportation costs that are necessary in order for an individual to participate in the SNAP E&T program.

¹² SNAP E&T 100 percent funds have been set at \$90 million per year since 2003. However, FY 2013 funds were cut to \$79 million. *Employment and Training Toolkit, Supplemental Nutritional Assistance Program*, Food and Nutrition Service, United States Department of Agriculture, 2013, 13, http://www.fns.usda.gov/sites/default/files/ET_Toolkit_2013.pdf.

¹³ So called "pledge" states share \$20 million in funding.

¹⁴ <http://www.basicfoodnet.org/>

¹⁵ As of the writing of this brief, the 2013 Farm Bill has not been passed in both houses. The 2013 Senate-passed Farm Bill includes \$4 billion in cuts to SNAP. The 2013 House Farm Bill included \$20.5 billion in cuts to SNAP and an amendment on additional work requirements was adopted. The House Farm Bill failed on the House floor on June 20, 2013 and next steps are still uncertain.

¹⁶ Dorothy Rosenbaum and Stacy Dean, *House Agriculture Committee Farm Bill Would Cut Nearly 2 Million People off SNAP*, Center on Budget and Policy Priorities, May 16, 2013, <http://www.cbpp.org/files/5-13-13fa.pdf>.