

Acknowledgements

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For more information on CLASP's work on SNAP:

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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 2014, over 48 million Americans lived in food insecure households.¹ To address the nutritional needs across the nation, the Supplemental Nutrition Assistance Program (SNAP), formerly known as Food Stamps, 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 members of households that include children, 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

2014.² However, many low-wage workers—even those who work full-time—do not earn enough to make ends meet.

SNAP is a critical support to helping families make ends meet. It is able to respond when the economy is weak and more people are unemployed or underemployed and poverty and SNAP participation increases. As the economy recovers, SNAP participation decreases. While SNAP caseloads increased dramatically to address the needs of individuals and families facing poverty during the recent recession from 26.3 million in 2007 to over 47 million in 2013, it has since declined to about 45 million toward the end of 2015.³ It is expected to continue declining as the economy recovers.

SNAP Works

SNAP is designed to support and encourage work among participants. It includes a deduction for earned income to reflect the cost of work-related expenses and it supports low wage workers who are struggling to make ends meet. 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.⁴

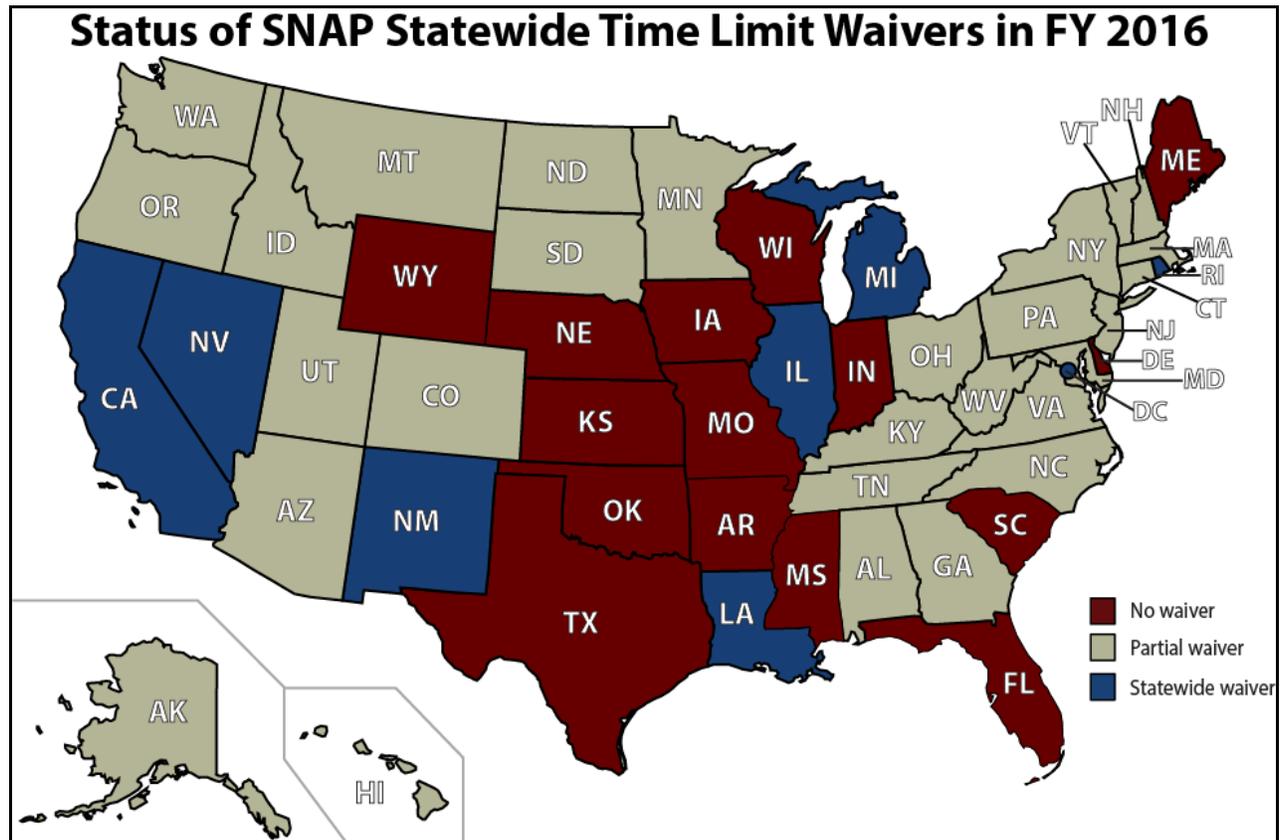
As a condition of eligibility, SNAP also requires that participants between the ages of 16 and 60 register for work, unless they are exempt from these requirements.⁵ Exemptions include those who are considered “physically or mentally unfit for employment;” complying with a TANF work requirement; a parent or household member caring for a dependent child under 6 years old or an incapacitated person; receiving unemployment compensation; participating in a drug addiction or alcoholic treatment and rehabilitation program; employed or self-employed; or enrolled at least half time in school, a training program, or an institution of higher education. States may sanction those who are not exempt from the requirements if they do not participate in assigned activities.

SNAP Time Limits

SNAP has even more harsh penalties for individuals who are considered Able Bodied Adults Without Dependents (ABAWDs). SNAP recipients ages 18 through 49 who do not live in households with children, are not pregnant, and who are not “physically or mentally unfit for employment,” or meet another exception are subject to a time limit on SNAP benefits for a total of 3 months in a 36 month period unless they are employed or are participating in a qualified work or training program for at least 20 hours a week, or are participating in workfare for the required number of hours. While this time limited is often mischaracterized as a “work requirement,” states are not required to provide any sort of employment or training services for this population. In addition, those who are actively searching for employment but are unable to find one, and those who are working but not meeting the required 20 hours per week will lose their benefits.

This time limit has been law since 1996, but in recent years, most states have qualified for a statewide waiver because of high unemployment rates. With a few exceptions, the statewide waivers ended in December 2015 or earlier. Moreover, many states have not requested waivers in some or all of the areas that qualify. CBPP has estimated that between 500,000 and 1 million individuals will lose benefits in 2016 due to this time limit.⁶

Individuals subject to the time limit are hit especially hard. Those facing cuts because of this time limit have extremely low incomes – an average of \$2,000 per year for a household of one in.⁷ In addition, most of those who are impacted do not qualify for any other forms of assistance to make ends meet. Many have significant barriers to employment including homelessness and limited education and skills or learning disabilities. Part-time workers, and those working as day laborers, are highly likely to be affected. States are not required to provide a qualified work or training opportunity for those at risk of losing SNAP benefits. Some states may choose to use portions of their SNAP Employment and Training (E&T) funds to provide qualifying activities to individuals subject to the time limit.⁸ However, SNAP E&T funding is extremely limited compared to the number of SNAP recipients who could potentially be eligible for services and most individuals subject to the time limit are not offered the opportunity to participate in a SNAP E&T program.



Source: "Status of State Able-bodied Adult without Dependents (ABAWD) Time Limit Waivers Fiscal Year 2016 – 3rd Quarter," Food and Nutrition Service, U.S Department of Agriculture, updated April 1, 2016.

SNAP Employment and Training Resources are Limited

The SNAP Employment & Training (SNAP E&T) program provides federal funding to states, in the form of grants, to help SNAP participants obtain jobs that will reduce their need for SNAP assistance. SNAP E&T can include components such as: job search; job search training; workfare; work experience; education; self-employment training; activities offered through the Workforce Innovation and Opportunity Act (WIOA); and job retention. SNAP E&T activities qualify as an employment and training program for those subject to work registration and for those subject to the time limit on SNAP.

SNAP E&T provides two types of federal funding available to states: 100 percent funds that go to states to administer state SNAP E&T programs and 50 percent federal reimbursement funds that states can access.⁹ For the 100 percent funds, each state receives a share of the total fund appropriated (\$79 million in FY 2014). States can claim 50 percent reimbursement on non-federal spending on SNAP E&T activities. This funding is uncapped.

States may offer SNAP E&T programs to assist individuals who are subject to the time limits; however, this is not a requirement. States, known as pledge states, that commit to serving all ABAWDs at risk of losing benefits can receive additional resources from a pot of \$20 million allocated for this purpose.

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. 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. In recent years, FNS has been encouraging states to expand and strengthen their SNAP E&T programs, and has provided technical assistance to support such programs.

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.¹⁰

Policies Must Invest in SNAP

SNAP remains a fiscal target and congress must protect it from cuts that would weaken its effectiveness. As congress considers the budget for FY 2017, the House Budget Committee recently approved a plan that would cut SNAP by more than \$150 billion over the next ten years, threatening to end food assistance for millions.¹¹ For those subject to the time limit, access to employment and training is especially critical. In 2016, between 500,000 to 1 million affected individuals will again be faced with securing employment or risk losing SNAP. While the ideal situation is that individuals are able to secure the employment and training they need, many of those subject to the time limit have significant barriers to employment, such as homelessness. In addition, the resources available under SNAP E&T are very limited compared to the number of people who could benefit from these services.

States must commit to serving those subject to the time limit to ensure that those who meet an exemption are not cut off of SNAP, and that those seeking employment and training activities have access to the resources that will help them succeed.

¹ Alisha Coleman-Jensen, Matthew P. Rabbitt, Christian Gregory, and Anita Singh, *Household Food Security in the United States in 2014*, Economic Research Service, USDA, September 2015, p.6, <http://www.ers.usda.gov/media/1896841/err194.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>; The number of SNAP participants who are employed can be found in the Characteristics of SNAP Households 2014, Table A.25, pg. 63: <http://www.fns.usda.gov/sites/default/files/ops/Characteristics2014.pdf>

³ "Chart Book: SNAP Helps Struggling Families Put Food on the Table," Center on Budget and Policy Priorities, March 24, 2016, <http://www.cbpp.org/research/food-assistance/chart-book-snap-helps-struggling-families-put-food-on-the-table>

⁴ Rosenbaum, p.10, <http://www.cbpp.org/files/1-29-13fa.pdf>.

⁵ See 7 CFR 273.7(a) and 7 CFR 273.7(b)(1) for exemptions.

⁶ Ed Bolen, Dottie Rosenbaum, Stacy Dean, and Brynne Keith-Jennings, *More Than 500,000 Adults Will Lose SNAP Benefits in 2016 as Waivers Expire*, Center on Budget and Policy Priorities, March 18, 2016, <http://www.cbpp.org/research/food-assistance/more-than-500000-adults-will-lose-snap-benefits-in-2016-as-waivers-expire>

⁷ Bolen, Rosenbaum, Dean, and Keith-Jennings.

⁸ Elizabeth Lower-Basch, *SNAP E&T Overview*, CLASP, March 2, 2014, <http://www.clasp.org/resources-and-publications/publication-1/SNAP-ET-Overview.pdf>

⁹ Lower-Basch. Note: 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.

¹⁰ <http://www.basicfoodet.org/>

¹¹ Dottie Rosenbaum and Brynne Keith-Jennings, *House 2017 Budget Plan Would Slash SNAP more than \$150 Billion over Ten Years*, Center on Budget and Policy Priorities, March 21, 2016, <http://www.cbpp.org/research/food-assistance/house-2017-budget-plan-would-slash-snap-by-more-than-150-billion-over-ten>