



Policy solutions that work for low-income people

March 28, 2018

Ms. Sasha Gersten-Paal
SNAP Program Development Division
Food and Nutrition Service
United States Department of Agriculture
3101 Park Center Drive, Rm 812
Alexandria, Virginia 22302

RE: Supplemental Nutrition Assistance Program: Requirements and Services for Able-Bodied Adults Without Dependents; Advance Notice of Proposed Rulemaking (RIN: 0584-AE57)

Dear Ms. Gersten-Paal,

Thank you for the opportunity to comment on the Advance Notice of Proposed Rulemaking (ANPRM) regarding the Supplemental Nutrition Assistance Program (SNAP) Able-Bodied Adults Without Dependents (ABAWD) time limit.

The Center for Law and Social Policy (CLASP) is a national, nonpartisan, antipoverty nonprofit advancing policy solutions for low-income people. We work at both the federal and state levels, supporting policy and practice that makes a difference in the lives of people living in conditions of poverty.

We are deeply concerned by attempts to further restrict food assistance to individuals for whom SNAP is essential to meeting their basic needs and providing a work support. While we strongly support the goal of helping SNAP recipients obtain and keep quality jobs that enable them to achieve economic security, we believe the restrictions suggested in the ANPRM will result in more people losing their SNAP benefits, making it harder to achieve this goal. Furthermore, the questions posed in the ANPRM appear to be based on the assumption that many SNAP recipients simply do not want to work, which we know to be untrue.

SNAP is our nation's most important anti-hunger program, providing food assistance to low-wage working families, people with disabilities, low-income seniors, and many more. SNAP helps 42 million people in nearly 21 million households put food on the table, including those referred to as ABAWDs.¹ These non-disabled adults ages 18-49 without dependent children are limited to just 3 months of SNAP in a 36-month period unless they engage in work or job training activities at least half time.² However, states are not required to offer opportunities for engagement, and most do not, so even if an individual is willing to work they can still lose their benefits. When several states re-instated the time limit in 2016, at least 500,000 ABAWDs lost SNAP.³

ABAWDs are a demographically diverse population in terms of race, education, and geography.⁴ ABAWDs face particular employment challenges since many lack reliable transportation, have unstable housing arrangements, have criminal records and unstable work histories, or have physical or mental health limitations. Access to SNAP for these individuals is crucial because many are extremely poor, and the program offers a lifeline to crucial food assistance.

In addition to fighting hunger, SNAP encourages work in several ways.⁵ First, SNAP's structure encourages work because as earnings rise, benefits phase out gradually. And because of the earned income disregard, earnings are treated more favorably than other income when benefits are calculated. Second, SNAP promotes employment by ensuring people have their basic needs met. Those working and seeking work on SNAP do not have to worry about when they will get their next meal. Instead, they can focus their energy on finding and keeping a job.

Contrary to the underlying assumptions in the ANPRM, work rates among SNAP participants are high. Among SNAP participants who can work, most do. In households with at least one working-age, non-disabled adult, 58 percent were employed while on SNAP, and 82 percent were employed shortly prior to or after receiving SNAP.⁶ Individuals are more likely to participate in SNAP when they are out of work and for many non-disabled adults, receipt of SNAP is short-term. Those with barriers to employment, including caretaking responsibilities, lack of education, a criminal history, and health issues are more likely to be consistently out of work.⁷

Many people must combine SNAP receipt and employment because they do not earn enough to make ends meet. The nature of today's low-wage labor market is characterized by unstable and low-quality jobs, meaning workers often need SNAP to help pay for food. In today's economy, many jobs that once provided workers with economic security have been replaced by temporary, part-time, and other contingent employment arrangements, which are often low-wage, low-quality jobs.⁸ A recent study projects that this trend will continue: 8 million new jobs will be added between now and 2022, however, most of these jobs will offer low wages.⁹

Despite a decline in the national unemployment rate, continued wage stagnation and worsening conditions mean that many workers are still struggling to make ends meet. The net increase in U.S. employment between 2005 and 2015 was entirely due to an increase in nonstandard or alternative work arrangements. The number of workers in these alternative work arrangements, including contract, temporary, and on-call employment increased by 9.4 million over this period.¹⁰

Despite wanting to work more, some low-wage workers struggle to receive enough hours from their employer to make ends meet. A report using 2015 data found that 6.4 million workers were involuntary part-time, meaning they wanted to work full-time but were only offered part-time hours.¹¹ According to the report, "involuntary part-time work is increasing almost five times faster than part-time work and about 18 times faster than all work." Workers ages 25-54 comprise almost 58 percent of all involuntary part-time workers and workers of color are more likely to be involuntary part-time. Black and Latino workers together represent 41 percent of all involuntary part-time workers. These populations are disproportionately affected by the ABAWD time limits.

Compounding these challenges, 83 percent of part-time workers report having unstable work schedules.¹² About half of low-wage hourly workers do not have 9-to-5, Monday-through-Friday jobs.¹³ A recent study found that 40 percent of hourly workers ages 26 to 32 receive one week or less advance notice of their job schedules.¹⁴ Unstable schedules make it difficult for workers to arrange transportation, arrange child care, attend job training or school, hold a second job, manage their budgets, and maintain a stable income.¹⁵

Programs that impose work requirements pose a particular challenge for workers with volatile schedules¹⁶ If their employer schedules them for fewer hours, their wages decrease, *and* they are at risk of losing benefits. Many workers may also lose benefits if they fail to submit paperwork to document constantly shifting hours of work. Most low-wage workers do not have access to paid leave, so they exist in a precarious financial situation, susceptible to losing their job simply for taking a day off to recover from illness or taking a loved one to the doctor.

Unfortunately, low-paying and low-quality jobs are often the only ones available to low-income individuals, meaning many workers need SNAP to help them cover basic needs. Because of the variable and unpredictable schedules that are inherent in these jobs, many individuals who are in fact working are at risk of losing their SNAP benefits when they are subject to the ABAWD time limit. While many low-wage workers face uncertainty in their jobs, SNAP provides the security of knowing there will be food on the table.

Below we have included responses to several of the questions posed in the ANPRM.

1. The Department is reviewing how it could take action on limiting ABAWD waivers as proposed in the President's budget proposals. In light of the Department's interest in helping SNAP participants find and maintain meaningful employment, how could the process for requesting to waive the time limit, the information needed to support waiver approval, and the waiver eligibility parameters be changed in order to provide appropriate relief for areas of high unemployment and a clearly demonstrated lack of jobs?

We strongly support the current criteria, set by federal law, by which states can suspend the ABAWD time limit, including the measures that demonstrate “lack of sufficient jobs” in order to best respond to local needs. Many individuals subject to the SNAP work requirements and ABAWD time limit struggle to find employment even in normal economic times. Current waiver criteria and authority allow states to respond to economic conditions and protect individuals who live in areas of high unemployment and where there is a lack of sufficient jobs.

States are best equipped to identify the short-term labor issues as well as long-term economic conditions that make it difficult for their residents to find meaningful employment. Reasons for a state to request a waiver statewide or in certain geographic areas can include lagging economic conditions in a particular region or industry, massive layoffs at a large employer, and a lack of jobs as a result of catastrophic events such as recessions or natural disasters.¹⁷

During the Great Recession, nearly all states applied for and received a waiver to suspend the time limit because of the ongoing economic crisis and persistently high unemployment rates. Since that time, states have re-instated the time limit in the entire state or certain areas. As of January 2018, just 8 states or territories are entirely waived from the time limit. Seventeen have no waiver in place and are subjecting all

ABAWDs in their state to the harsh time limit, and another 28 apply the time limit to some portion of their state.¹⁸ The question posed in the ANPRM suggests that states are taking advantage of the time limit waiver, which is unfounded in USDA's own report.

We strongly oppose any attempts to limit the criteria by which states can apply for waivers from the time limit and discourage USDA from imposing restrictions to the already limited ways that states can respond to local economic conditions within the harsh federally-imposed ABAWD time limit. To further restrict state flexibility in this regard would put many vulnerable individuals at risk for hunger and food insecurity.

a) How could the definition of “lack of sufficient jobs” be revised to better support these goals?

We strongly support the current criteria, set by federal law, by which states can suspend the ABAWD time limit, including the measures that demonstrate “lack of sufficient jobs” to best respond to local needs.

b) States currently have discretion to define the area they are requesting to waive. Should States maintain this flexibility? Should an “economic area” be limited in geographic scope, such as to a single county, metropolitan area, or labor market area?

State flexibility to request waivers (either statewide or in a certain area) allows them to be responsive to economic conditions and the needs of their residents. States are best equipped to evaluate local labor market variables and determine whether or not the ABAWD time limit should be in place. States must demonstrate how certain areas meet the current criteria and should continue to be allowed to do so without federal definitions or restrictions on what constitutes an “economic area.” The current waiver criteria allow states to be immediately responsive to local conditions and ensure that the ABAWD time limit does not create additional hardships.

c) Should FNS accept data from additional sources of information that are currently not considered? If so:

- 1. What data sources would that be?**
- 2. What review process should FNS use to verify the validity of the data?**

d) How recent should the data and information used in support of a waiver be in relation to the waiver implementation date?

e) Waivers are typically approved for 1 year, although under certain criteria 2 year waivers are available. Should FNS consider waivers of different time periods? If so, what time period and under what conditions?

The time limit is complicated to administer and requires significant advance planning to operationalize in a way that does not cause significant harm for SNAP recipients as well as state resources. States must put systems in place to identify and exempt ABAWDs, develop policies, create notices, implement technology changes, and ideally provide opportunities for ABAWDs to meet the participation requirements to receive SNAP beyond 3 months. Approving waivers for periods less than one year would pose an unreasonable burden on state agencies, workforce services providers, and SNAP recipients.

2. How can existing authority and resources be best used to support ABAWDs as they transition to meaningful work and self-sufficiency? How could the Department better support State efforts to assess individuals' work readiness and identify appropriate services to help participants obtain and retain employment?

A postsecondary credential is increasingly required for all but the lowest-paying jobs. A synthesis of the literature on what works in employment and training is unequivocal: “A post-secondary education, particularly a degree or industry-recognized credential related to jobs in demand, is the most important determinant of differences in workers’ lifetime earnings and incomes.”¹⁹ The ever-changing domestic and global economics have raised the demand for highly productive workers trained in specific skills or credentials. As the demand for skilled workers continues to rise, supporting additional educational and training pathways must be a priority.

a) What challenges and barriers do States face in helping ABAWDs find and maintain employment? What do States need to build or strengthen their capacity, investment, and expertise in working with this population?

Some ABAWDs will have substantial stabilization needs, e.g., safe housing, addiction services, domestic violence resistance, and as people surmount those barriers, access to a need as basic as food is paramount. The Government Accountability Office (GAO) found that SNAP participants subject to the ABAWD time limit are more likely than other SNAP participants to lack basic job skills like reading, writing, and basic math.²⁰ In a study of ABAWDs referred to participate in activities in Franklin County, Ohio individuals reported a myriad of challenges. Issues facing these ABAWDs include unstable housing situations, inconsistent mobile phone access to communicate with the state agency, criminal records, unreliable transportation, owing child support for children not in their custody, and a lack of education. Most of the ABAWDs surveyed also reported being employed, although only 25 percent indicated working at least 20 hours per week.²¹

People should not be punished for grappling with hardship. Long-term investments in workforce programs, including SNAP E&T, should be considered. However, mandating participation would take resources away from employment services to instead focus on tracking hours and meeting paperwork requirements. The complexity and capacity needed to serve ABAWDs is reflected in that just a handful of states have pledged to fully serve this population in their E&T program, even though additional funds are provided to do so.

b) What is the appropriate role of States in assessing ABAWDs for barriers to employment, job skills, and career interests in order identify appropriate opportunities for fulfilling the work requirements? At what point in the process is this most useful? During the interview? After certification?

SNAP is first and foremost a food assistance program. Many SNAP recipients are already employed, but not earning enough to meet their nutritional needs. Others are experiencing temporary periods of unemployment or a life crisis, such as escaping a domestic violence situation. With most states completing SNAP interviews by phone, an additional screening with a worker trained to identify any opportunities for fulfilling work requirements will create another step in the application process. Screenings should never be required during the certification process when they could become a barrier to SNAP, whether perceived or real, or a cause for delays in processing applications.

Exemptions from the time limit should be evaluated at application and recertification to ensure those who are exempt are correctly identified. When appropriate, individuals ready and able to seek work should be referred to the workforce agency and/or third-party service providers for assessments and services that can be used to determine the appropriate opportunities and services given the individual's work history and interests. If a recipient has completed an assessment under another program, such as TANF or WIOA, that information could be used instead.

c) How can existing resources be leveraged by States to help ABAWDs find and maintain employment? Are there State/local/Federal or other stakeholders that can be leveraged to provide holistic services to ABAWDs?

Low-skilled workers need adult education, postsecondary education, and job training to develop skills and secure good jobs. Systems should be aligned to deliver services to low-income individuals based on a career pathways model that leverages funding streams, technology, and service delivery to best fit the needs of individuals seeking training or employment. However, our existing workforce systems are chronically underfunded and not designed to serve the range of needs of all ABAWDs. Funding levels for employment and training programs has decreased since the early 2000s, which has sharply reduced the capacity for workforce programs to provide services. The workforce system does not have the capacity to provide the large number of people who are subject to the ABAWD time limit under current rules with the high quality services that individuals with barriers to employment need to find work that provides economic security.²² As noted above, mandating participation has not been proven effective at helping people get meaningful employment. Our workforce systems are designed to help individuals on a path to economic independence through work, but SNAP is a crucial support along the way to ensure basic needs are met.

d) Are there evidence-based activities that States could offer through their SNAP E&T programs that would help reduce barriers to employment among ABAWDs? What kinds of support services, job-retention services and other activities would increase success of ABAWDs moving into gainful employment?

While not everyone who receives SNAP benefits needs employment services, they can be helpful for specific populations. There are some promising models that improve employment and training outcomes for participants in SNAP E&T, the most effective of which include a robust array of services that help people obtain additional education or certifications and develop soft skills while also providing high-quality supportive services. Additionally, evidence shows that there is no single service approach that is right for all workers.²³

SNAP recipients will benefit most from SNAP E&T-funded services if services are based on an individualized assessment of the clients' barriers to employment and self-sufficiency and the strengths the clients bring to address their barriers. One size fits all approaches do not serve anyone well because some people, such as those with recent employment history, receive services that they do not need, while others with more significant challenges do not receive the support they need.

Some of the best designed E&T programs are those which provide voluntary skills-based employer-driven training. We urge USDA not to impose requirements for states to provide a prescribed set of activities intended to enhance employment until the SNAP E&T pilots have been completed and can be evaluated to

determine the most effective activities and service-delivery models, as well as the necessary state capacity needs.

e) Are there additional ways that States could incentivize employers to provide jobs to ABAWDs?

Instead of penalizing people for being poor and requiring assistance to put food on the table, USDA should consider ways to create a foundation for long-term economic success. Subsidized and transitional jobs stabilize individuals and families by enabling them to earn needed income, reestablish connections to the workforce, and gain the experience and work history needed to find future employment.²⁴ Such jobs also stimulate local economies by putting money in consumers' pockets, while boosting productivity for employers participating in subsidy programs. These programs create much-needed supports but also require resources and capacity to make a difference. In addition, such programs should be designed so as to ensure that employers are not receiving windfalls for hiring the people whom they would already have employed in low-wage, high-turnover jobs.

f) Should ABAWDs be subject to additional reporting requirements or be limited to a specific type of reporting system (e.g., change reporting, monthly reporting, quarterly reporting, or simplified reporting)? Have States that have assigned ABAWDs to a reporting system other than simplified reporting found this to be beneficial?

ABAWDs should not be subject to additional reporting requirements or a separate processing standard as it would be extremely administratively complex and burdensome. ABAWDs should always be able to report potential exemptions. However, creating additional reporting requirements and/or more frequent recertifications would simply create additional barriers and cause more work for SNAP agencies. The result of this type of administrative complexity and red tape would be eligible people losing their food assistance because the processes to maintain eligibility are too cumbersome.

Additional reporting requirements would also increase "churn," which is when eligible recipients fail to complete their renewals but then return to apply again. Churn entails costs for both recipients and state agencies.²⁵ Consequences of churn for clients include lost benefits, short-term hardship, and resources spent reapplying. State SNAP agencies have worked hard in recent years to reduce their administrative burden and churn—additional reporting requirements are a step in the opposite direction.

To require separate reporting or certification systems for ABAWDs would be administratively complex and burdensome and would undermine the tremendous progress states have made in recent years to streamline business processes. While we strongly believe that ABAWDs should always be able to report changes that would potentially lead to exemptions, to require more frequent reporting or recertifications would simply create additional barriers.

g) What approaches have States found effective in communicating with ABAWDs to educate them on the work requirements, tools and resources that can help them find or keep employment, and crucial administrative actions or deadlines they must adhere to?

Communication with ABAWDs should include a variety of methods to ensure that the time limit is clearly understood, including mail, text notifications, notices through community partners, and client-friendly website information.

3. The accurate determination of whether an individual is physically or mentally unfit for employment is fundamental to applying the time limit to the proper individuals, and exempting others, consistent with the Act. In addition, it allows States to focus work strategies on those individuals who are truly capable of benefiting from them.

We oppose restrictions on the conditions or indicators that cause a SNAP participant to be determined “unfit for employment” and exempted from the ABAWD time limit. Any additional burdens placed on state agencies or individuals to verify this status would only result in barriers to accessing much-needed food assistance. Many individuals characterized as ABAWDs have significant barriers to employment. In the Franklin County, Ohio ABAWD report, one-third of individuals reported having a “physical or mental limitation.”²⁶ Although some conditions may not meet the stringent standard to qualify the individual for a federal disability benefit, they still may have significant barriers to working 20 hours or more per week. The Bureau of Labor Statistics (BLS) reports that workers with disabilities are nearly twice as likely as workers with no disability to be employed part-time.²⁷

The term “unfit for employment” is outdated, as we know that people with disabilities can and do work. However, the employment landscape may be significantly more challenging to navigate for individuals with disabilities. In a May 2012 report, BLS reported that half of working-age adults with a disability who were not working reported barriers to employment, including a lack of transportation and the need for accommodations in a workplace.²⁸ Because of the historic unemployment and underemployment of people with disabilities, which current workforce and SNAP employment systems are not adequately structured or funded to solve, any change to restrict the ABAWD definition of “unfit for employment” would result in the loss of crucial nutrition assistance for millions of low-income individuals.

a) What is the appropriate scope of conditions and indicators of physical or mental unfitness for employment under current statutory authority, particularly in State determinations of whether an individual is obviously physically or mentally unfit for employment? What level of State flexibility is appropriate in this area? Why?

Neither USDA nor state agencies are equipped to create and maintain a list of physical or mental indicators for unfitness. Instead, a wide variety of data sources and verification types should be accepted to determine unfitness, especially as many barriers may be difficult to identify. Individuals subject to the ABAWD time limit may not have access to health insurance, especially in states that have not expanded Medicaid eligibility under the Affordable Care Act or that have imposed work requirements or lock out periods under Medicaid. Individuals without health insurance often do not have complete diagnoses or access to medical documentation of the conditions that limit their ability to work. Therefore, it is critical that states have the flexibility to accept indirect evidence of their barriers to employment, such as might be provided by a social worker or other professional.

b) How do current certification processes (use of technology, lack of face-to-face interaction) affect the ability to determine exceptions or exemptions to the ABAWD time limit? How can these processes be modified or enhanced to best support these determinations, while providing any needed reasonable accommodations for individuals?

Technology can be a barrier, but with a thorough exemption screening process states should be asking applicants a series of questions that may help identify exemptions. Individuals should be able to report this information on applications (either in person or online) and during certification periods (phone, mail, online portals, or in-person). A wide array of documentation should be accepted to verify an exemption and states should be held accountable to accurately screen individuals when reinstating the time limit. This should begin at least one or two recertification cycles in advance to ensure exempted individuals will not be subjected to the time limit and lose SNAP.

- c) Who should determine whether a participant is fit to work? What technical and information resources, or other resources, would best support States to better screen for unfitness for employment and other exceptions to the ABAWD time limit? What performance and/or accountability measures would support this process?**

Because there are various reasons that someone may be determined “unfit for employment,” the criteria and process should be flexible and accommodating. It may be challenging for some to self-identify their barriers if asked if they are ‘unfit’, but asking a series of other questions may help identify individuals who should be exempt but are not. Medicaid or other health data may also be useful in identifying health issues that could make it difficult for someone to participate 20 hours or more per week.

- d) How can the Department/States better engage and serve individuals determined to be unfit for employment? How can State agencies provide these individuals with services or opportunities that may increase their fitness for work?**
- e) What are best practices for the use of 15 percent exemptions in supporting the appropriate application of ABAWD requirements?**

The 15 percent exemptions allow states the flexibility to exempt individuals in a variety of situations. Based on FNS data, states are utilizing these exemptions carefully and are not abusing their authority to exempt additional individuals.²⁹ Situations that warrant use of a 15 percent exemption vary from individualized life situations to state technology challenges to a lack of participation opportunities.

The changes suggested in the ANPRM would result in many SNAP participants losing critical food assistance, which would create a barrier to finding and maintaining meaningful employment.³⁰ The ABAWD time limit does not strengthen opportunities for employment, and the questions posed by USDA greatly concern us since they suggest changes that would, if adopted, expand the harsh time limit to many more SNAP participants. Putting up barriers to food assistance will not incentivize or equip people with what they need to seek and maintain work. We strongly discourage USDA from implementing policies that will put many more individuals at risk of hunger and food insecurity.

Thank you for considering our comments.

Sincerely,

Nune Phillips

- ¹ U.S. Department of Agriculture, "SNAP Participation," Food and Nutrition Service, March 2018, <https://fns-prod.azureedge.net/sites/default/files/pd/34SNAPmonthly.pdf>.
- ² Center on Budget and Policy Priorities, "Unemployed Adults Without Children Who Need Help Buying Food Only Get SNAP For Three Months," <https://www.cbpp.org/unemployed-adults-without-children-who-need-help-buying-food-only-get-snap-for-three-months>.
- ³ 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 2016, <https://www.cbpp.org/research/food-assistance/more-than-500000-adults-will-lose-snap-benefits-in-2016-as-waivers-expire>.
- ⁴ Steven Carlson, Dorothy Rosenbaum, and Brynne Keith-Jennings, "Who Are the Low-Income Childless Adults Facing the Loss of SNAP in 2016?," Center on Budget and Policy Priorities, February 2016, <https://www.cbpp.org/research/food-assistance/who-are-the-low-income-childless-adults-facing-the-loss-of-snap-in-2016>.
- ⁵ Nune Phillips, "SNAP and Work," CLASP, January 2018, https://www.clasp.org/sites/default/files/publications/2018/01/2018_snapandwork.pdf.
- ⁶ Center on Budget and Policy Priorities, "Chart Book: SNAP Helps Struggling Families Put Food on the Table," February 2018, <https://www.cbpp.org/research/food-assistance/chart-book-snap-helps-struggling-families-put-food-on-the-table>.
- ⁷ Brynne Keith-Jennings and Raheem Chaudhry, "Most Working-Age SNAP Participants Work, But Often in Unstable Jobs," Center on Budget and Policy Priorities, March 2018, <https://www.cbpp.org/research/food-assistance/most-working-age-snap-participants-work-but-often-in-unstable-jobs>.
- ⁸ National Employment Law Project, "The Low-Wage Recovery and Growing Inequality," August 2012, <http://www.nelp.org/content/uploads/2015/03/LowWageRecovery2012.pdf>.
- ⁹ Aimee Picchi, "America's Job Problem: Low-Wage Work is Growing Fastest" CBS News, August 2017, <https://www.cbsnews.com/news/americas-job-problem-low-wage-work-is-growing-fastest/>.
- ¹⁰ Lawrence F. Katz and Alan B. Krueger, "The Rise and Nature of Alternative Work Arrangements in the United States, 1995-2015," NBER, September 2016, <http://www.nber.org/papers/w22667>.
- ¹¹ Lonnie Golden, "Still Falling Short on Hours and Pay," Economic Policy Institute, December 2016, <http://www.epi.org/publication/still-falling-short-on-hours-and-pay-part-time-work-becoming-new-normal/>.
- ¹² Lonnie Golden, "Irregular Scheduling And Its Consequences," Economic Policy Institute, April 2015, <http://www.epi.org/publication/irregular-workscheduling-and-its-consequences>.
- ¹³ Liz Ben-Ishai, Volatile Job Schedules and Access to Public Benefits, CLASP, September 2015, <https://www.clasp.org/sites/default/files/public/resources-and-publications/publication-1/2015.09.16-Scheduling-Volatility-and-Benefits-FINAL.pdf>; Liz Watson and Jennifer E. Swanberg. "Flexible Workplace Solutions for Low-Wage Hourly Workers: A Framework for a National Conversation," Georgetown Law and University of Kentucky, 2011, [http://workplaceflexibility2010.org/images/uploads/whatsnew/Flexible percent20Workplace percent20Solutions percent20for percent20LowWage percent20Hourly percent20Workers.pdf](http://workplaceflexibility2010.org/images/uploads/whatsnew/Flexible%20Workplace%20Solutions%20for%20LowWage%20Hourly%20Workers.pdf). See also, Susan Lambert and Julia Henly. "Work Scheduling Study," University of Chicago, September 20, 2011, <http://ssascholars.uchicago.edu/work-schedulingstudy/announcements/work-scheduling-study-papers>.
- ¹⁴ Susan J. Lambert, Peter J. Fugiel, and Julia R. Henly, "Schedule Unpredictability Among Early Career Workers in the US Labor Market: A National Snapshot," University of Chicago, July 2014, http://ssascholars.uchicago.edu/einet/files/lambert.fugiel.henly_executive_summary.b.pdf.
- ¹⁵ Liz Ben-Ishai, Hannah Matthews, and Jodie Levin-Epstein, "Scrambling for Stability: The Challenges of Job Schedule Volatility and Child Care," CLASP, March 2014, <https://www.clasp.org/sites/default/files/public/resources-and-publications/publication-1/2014-03-27-Scrambling-for-Stability-The-Challenges-of-Job-Schedule-Volat-.pdf>.
- ¹⁶ *Volatile Job Schedules and Access to Public Benefits*.
- ¹⁷ *More Than 500,000 Adults Will Lose SNAP Benefits in 2016 as Waivers Expire*.
- ¹⁸ U.S. Department of Agriculture, "Status of State Able-Bodied Adult without Dependents," Food and Nutrition Service, January 2018, <https://fns-prod.azureedge.net/sites/default/files/snap/FY-2018-Quarter-2-ABAWD-Waiver-Status.pdf>.
- ¹⁹ U.S. Department of Labor, "What Works In Job Training: A Synthesis of the Evidence," July 2014, <https://www.dol.gov/asp/evaluation/jdt/jdt.pdf>.
- ²⁰ U.S. General Accounting Office, "Food Stamp Employment and Training Program Better Data Needed to Understand Who Is Served and What The Program Achieves," Government Accountability Office, March 2003, <https://www.gao.gov/assets/240/237571.pdf>.
- ²¹ Ohio Association of Foodbanks, "Franklin County Work Experience Program," 2015, http://admin.ohiofoodbanks.org/uploads/news/ABAWD_Report_2014-2015-v3.pdf.
- ²² Anna Cielinski, "Federal Investment in Employment and Job Training Services Has Declined Over the Last 40 Years," CLASP, December 2017, <https://www.clasp.org/sites/default/files/publications/2017/12/12.15.17%20Federal%20Investment%20in%20Employment%20and%20Job%20Training.pdf>.
- ²³ U.S. Department of Agriculture, "Supplemental Nutrition Assistance Program (SNAP) Employment and Training (E&T) Best Practices Study: Final Report," Food and Nutrition Services, November 2016, <https://fns-prod.azureedge.net/sites/default/files/ops/SNAPEandTBestPractices.pdf>.
- ²⁴ Liz Ben-Ishai and Elizabeth Lower-Basch, "Job Creation and Quality," Center for Law and Social Policy, August 2014,

<https://www.clasp.org/sites/default/files/publications/2017/04/A-job-creation-and-job-quality-agenda-for-Labor-Day-1.pdf>.

²⁵ Dottie Rosenbaum, “Lessons Churned: Measuring the Impact of Churn in Health and Human Services Programs on Participants and State and Local Agencies,” Center on Budget and Policy Priorities, March 2015, <https://www.cbpp.org/research/lessons-churned-measuring-the-impact-of-churn-in-health-and-human-services-programs-on>.

²⁶ Ohio Association of Foodbanks, “Franklin County Work Experience Program,” 2015, http://admin.ohiofoodbanks.org/uploads/news/ABAWD_Report_2014-2015-v3.pdf.

²⁷ U.S. Department of Labor, “Persons with a Disability: Labor Force Characteristics—2016,” Bureau of Labor Statistics, June 2017, <https://www.bls.gov/news.release/pdf/disabl.pdf>.

²⁸ U.S. Department of Labor, “Persons with a Disability: Barriers to Employment, Types of Assistance, and Other Labor-Related Issues—May 2012, Bureau of Labor Statistics, April 2013, https://www.bls.gov/news.release/archives/dissup_04242013.pdf.

²⁹ U.S. Department of Agriculture, “ABAWD 15 Percent Exemptions,” Food and Nutrition Service, February 2018, <https://www.fns.usda.gov/snap/abawd-15-percent-exemptions>.

³⁰ Jessica Gehr, “Doubling Down: How Work Requirements in Public Benefit Programs Hurt Low-Wage Workers,” CLASP, June 2017, <https://www.clasp.org/sites/default/files/publications/2017/08/Doubling-Down-How-Work-Requirements-in-Public-Benefit-Programs-Hurt-Low-Wage-Workers.pdf>.