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## STRATEGIES TO IMPROVE THE EFFECTIVENESS OF SNAP'S EMPLOYMENT AND TRAINING PROGRAM

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### INTRODUCTION

Food is necessary for people to thrive. The Supplemental Nutrition Assistance Program (SNAP) provides additional resources for food, improves access to nutrition, and helps families afford other basic needs such as rent, utilities, and medical expenses. The SNAP program has been shown to support work, stimulate economic growth, improve academic outcomes for children, and promote better health outcomes for recipients.<sup>1, 2, 3, 4</sup> As of June 2023, SNAP reached more than 22 million households and 42 million people each month.<sup>5</sup>

Many SNAP recipients are children, seniors, people with substantial caregiving responsibilities, or people with significant disabilities who are not expected to work. SNAP helps workers in jobs that pay low wages, who hold positions that offer irregular hours, or when they are between jobs.

Congress established what is now the SNAP Employment & Training (SNAP E&T) program through the Food Security Act of 1985. The purpose of the program, as stated in the legislation, is “assisting members of households participating in the food stamp program [now known as SNAP] in gaining skills, training, or experience that will increase their ability to obtain regular employment.”

The SNAP E&T program, however, currently has several onerous restrictions that target certain communities. These rules perpetuate historical, systemic bias against people with low incomes and people of color. To end the harm, the Center for Law and Social Policy (CLASP) offers policymakers and advocates a review of key SNAP policies and strategies for improvement. This report includes:

- Basic elements of SNAP E&T, including who is eligible, the program’s components, and its funding streams;
- Differences between mandatory and voluntary programs;
- How the E&T program interacts with other SNAP provisions, including time limits and eligibility restrictions facing particular groups of people; and
- Recommendations to move beyond the program’s classist and racist origins and make it a more effective pathway to opportunity.

From the beginning, the E&T program had inherent tension. On the one hand, it offered access to training programs that could potentially lead to better jobs for people with low incomes receiving food assistance. It helped with the costs of participating in such trainings. On the other hand, these programs could be, and often were, mandatory—meaning that people who did not participate in E&T could be denied food assistance.

Congress added another complication in 1996 by imposing limits on SNAP benefits for certain adults, restricting them to using the program for only three months during a three-year period if they do not meet certain work requirements. People under this restriction were so-called “able-bodied adults without dependents” (ABAWDs). This group was subject to the three-month cap if they were not working for at least 20 hours per week or not participating in a work program such as SNAP E&T.<sup>6</sup>

Both the mandatory participation requirements and the ABAWD time limit are grounded in classist and racist assumptions. These restrictions wrongly stereotype people with low incomes, especially people of color, as individuals who do not want to work and must be coerced into doing so.<sup>7</sup>

In recent years, SNAP E&T has become a significant funding stream for voluntary employment and training services for people enrolled in SNAP, as well as for a wide variety of wrap-around supportive services. Such supports include child care and transportation that make it possible for people enrolled in SNAP to access higher-paying careers and industries that would otherwise be inaccessible. This has been particularly important because other federal funding streams for training have limited support and have rarely focused on the needs of the lowest-income workers.<sup>8</sup>

However, along with these high-quality programs, other SNAP E&T programs exist primarily to “check the box” for people subject to the time limit but prevent them from losing their benefits. Still other programs are just another obstacle that people seeking food assistance must navigate.

## SNAP E&T has multiple purposes. However, they run counter to each other when it comes to preventing food insecurity.

A support for voluntary **employment, training, and supportive services** that can be effective in supporting people with low incomes.

**BUT** at the same time, it can uphold a **mandatory work requirement** that acts as a **barrier** to assistance.

A support to help people subject to able-bodied without dependents (ABAWDs) **time limit** to **keep** their **SNAP benefits**.

**BUT** at the same time, it funds program restrictions **limiting access to food assistance**.

## WHAT IS SNAP E&T?

### ELIGIBILITY

SNAP E&T services are limited to people enrolled in SNAP. Participants must be receiving SNAP benefits in every month they receive E&T services. This means that people lose eligibility for SNAP E&T if their earnings increase above the SNAP eligibility threshold. Individuals who are excluded from receiving SNAP benefits because of certain restrictions, such as barriers related to immigration status or a criminal record, are therefore ineligible for SNAP E&T services.<sup>9, 10</sup>

This prevents immigrants from receiving federal means-tested public benefits for five years after they attain lawfully present status. The program also includes a lifetime ban preventing individuals convicted of a drug felony from receiving SNAP or SNAP E&T assistance.

Youth (ages 16 to 18) may voluntarily participate in employment and training services if they are members of a household with a member who is receiving SNAP benefits.

People receiving cash assistance from Temporary Assistance for Needy Families (TANF) are ineligible for SNAP E&T because they are assumed to be eligible for similar services from TANF. This is increasingly not the case, however, because few TANF programs operate training programs that are as robust as those now supported under E&T.

SNAP E&T and TANF administrators should coordinate the two programs to allow more families with low incomes the opportunity to access high-quality employment and training programs. People enrolled in TANF can also benefit from ongoing supportive services, such as child care and transportation, that help with job retention.



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## PROGRAM COMPONENTS

The Food and Nutrition Service (FNS), under the United States Department of Agriculture, defines an E&T program as including case management plus one or more of the following components:

- **Supervised job search:** This occurs virtually or at a state-approved site;
- **Job search training:** That aims to teach participants job-seeking techniques;
- **Workfare:** This is an unpaid assignment at a public or private non-profit agency;
- **Work experience programs,** including:
  - Work activities: These are activities where participants acquire the general skills, knowledge, and work habits needed to obtain employment; and
  - Work-based learning: Such as internships, pre-apprenticeships, apprenticeships, customized training, transitional jobs, incumbent worker training, and on-the-job training.
- **Education:** This can include activities such as job readiness, Adult Basic Education, basic literacy, English as a Second Language, high school equivalency (GED), career and technical education, and other postsecondary education;
- **Self-employment training:** This effort trains participants to design and operate a self-employment venture; and
- **Job retention:** This component provides support services for at least 30 days, and up to 90 days, to individuals who have secured employment. Activities such as job coaching and case management are approved by the U.S. Secretary of Agriculture.

Not all states operate SNAP E&T programs that include all allowable components. To offer one of these elements, a state must include it in its annual SNAP E&T plan submitted to FNS. Congress strengthened the SNAP E&T program as part of the 2018 Farm Bill by adding subsidized employment and apprenticeships as allowable E&T activities. For the first time, this let E&T participants use workforce partnerships to satisfy work requirements and be paid a wage using E&T funds.

SNAP E&T funding can also support a wide range of wrap-around services for participants that they would not otherwise be able to access. The program can reimburse recipients for an array of expenses related to participation in a SNAP E&T component, such as the costs of dependent care, transportation, uniforms, books, safety equipment, interview clothing, test fees, and supplies. The state must reimburse participants for necessary costs to participate in E&T programs, whether mandatory or voluntary. The state may set caps on the amount that gets reimbursed.

If the state cannot provide reimbursement for services in a mandatory program that a participant needs to participate, such as child care or transportation, this individual cannot be sanctioned for non-participation. That is also the case if the actual costs to join the mandatory program exceed the caps.

## HOW SNAP E&T IS FUNDED

The SNAP E&T program’s two main types of federal funding are grants and reimbursement dollars, specifically:

- 100 percent grant funds from federal sources that are dedicated to supporting the state’s E&T program; and
- 50 percent reimbursement funds (50/50 funds), which use federal dollars to reimburse states for 50 percent of the costs for providing E&T services.

States can also support SNAP E&T programs with local funds, through private partnerships or local investments from E&T providers. These funding efforts are collectively called “third-party match” programs.

FEDERAL SNAP E&T FUNDING <sup>11</sup>		
E&T PROGRAM GRANT (100 PERCENT) FUNDS	50 PERCENT REIMBURSEMENTS (50-50 FUNDS)	ABAWD (“PLEDGE STATE”) GRANT FUNDS
<ul style="list-style-type: none"> <li>· Formula-based grants to States to plan, implement, and operate SNAP E&amp;T services.</li> <li>· Total funding available in FFY 2016: \$90 million.</li> <li>· All States receive 100 percent funding. Some States do not spend their full allocations; remaining dollars may be reallocated to other States.</li> </ul>	<ul style="list-style-type: none"> <li>· Reimbursement grants (50 cents per dollar obligated) for SNAP E&amp;T program costs exceeding those covered by 100 percent funds or for supportive services provided to participants.</li> <li>· Funds eligible for reimbursement can include state or local funds <b>or</b> non-federal funds put up by “third-party” providers contracted by States to offer E&amp;T services.</li> <li>· States may request 50-50 funds from FNS.</li> </ul>	<ul style="list-style-type: none"> <li>· For States pledging to offer qualifying E&amp;T services to ABAWDs at risk of losing SNAP eligibility due to time limits.</li> <li>· States may request to be a “pledge” State and thus receive these funds.</li> <li>· Currently capped at \$20 million annually for all pledge States, allocated based on the size of ABAWD population.</li> </ul>

### *Drawing on federal grants for state E&T programs*

Each state annually receives a capped allotment of 100 percent federal funds to provide SNAP E&T services (other than participant reimbursements). Every state’s share is based on a formula that considers the number of people who could potentially participate in E&T services. USDA currently provides about \$122 million in 100 percent funds to states for E&T programs.<sup>12</sup>

This allotment is insufficient to fund quality training and essential support services for the total number of potentially eligible SNAP recipients. In many states, the allotment is entirely consumed by job search activities and referrals to employment and training that are funded from other sources.

States can also qualify for a share of a small pot of additional 100 percent federal funds if they commit to serving all unemployed childless adults who would otherwise be at risk of losing SNAP benefits due to the ABAWD time limit.

### *Provision of 50/50 reimbursement funds*

Under the second type of funding that focuses on reimbursements, states can claim a 50 percent refund for non-federal spending on SNAP E&T activities. This funding is not capped. To draw down these funds, states must include a description of activities and a proposed budget in a SNAP E&T plan. FNS must approve the plan. Payments to clients for participation-related expenses (e.g., child care, transportation, uniforms, etc.) are only eligible for the 50 percent federal reimbursement, not for 100 percent federal funding.

The uncapped reimbursement under SNAP E&T is significant because federal funding for workforce activities is deeply insufficient to meet the need. Most funding under the Workforce Innovation and Opportunity Act (WIOA) goes to maintain the infrastructure of one-stop career centers, not to job training or the support services needed for participants to succeed.<sup>13</sup> WIOA programs also often screen out participants who do not enter programs with specified qualifications, such as reading or math skills.

SNAP E&T funding has increasingly filled this gap, providing resources for training and development opportunities. It also underwrites wrap-around support for people enrolled in SNAP who often face multiple structural barriers to employment, such as previous histories of incarceration.<sup>14, 15</sup>

### *Investments via third-party match*

In the past, states mostly claimed reimbursement for direct state and local expenditures under the 50 percent reimbursement funding stream. In recent years, many states have increased efforts to claim expenses incurred by community colleges and other not-for-profit organizations under contract with the state agency operating SNAP E&T. These plans are sometimes referred to as “third-party match” programs.

Third-party funds used to leverage additional federal support can be state or locally appropriated—or provided by foundations or other private entities. Provider spending that comes from other sources, but cannot come from other federal grant programs, can also fall into this category. FNS estimates that states will draw an additional \$13 million in matching funds in FY 2024 compared to FY 2023.<sup>16</sup>

Under third-party match programs, community colleges or community-based organizations providing quality workforce development services receive 50 percent reimbursement for their services. They can also expand their capacity to serve individuals in high-need communities. However, this approach is limited by some of the complexities of the SNAP E&T program. For example, participants must be enrolled in SNAP during every month they are served with E&T funds. In addition, the provider must generally pay for the full, initial costs of the program with non-federal funds and wait to be reimbursed.

When included in a state’s approved SNAP E&T plan, states and counties may now offer subsidized work-based learning as a part of their E&T programs. They can also partner with third parties qualified to provide these services in their communities.<sup>17</sup> This is especially important because available funding for subsidized employment programs remains low, despite their proven efficacy for increasing employment outcomes and boosting income for people with structural barriers to employment.<sup>18</sup>



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When you snatch benefits away, people are forced to go into survival mode...and when someone is in survival mode, all you're thinking about is, I have to eat, my kids have to eat. It's like they create all these laws to set you up to fail.

**Tonya, Ohio**

## MANDATORY VS. VOLUNTARY E&T

SNAP E&T programs are classified as either mandatory or voluntary. Under mandatory programs, people who are assigned to an E&T program do not participate in it can lose their SNAP benefits. The state has options about the length of the sanction. A household that includes a sanctioned individual will experience some loss of SNAP benefits.

Mandatory programs typically focus on “job readiness” and job search activities. These efforts have lower costs than skill-building training. They are also grounded in stereotypes that people using SNAP benefits do not already have the motivation to work or the necessary experience for seeking jobs. By contrast, people who participate in voluntary programs are not at risk of losing their benefits. They participate because they believe they will benefit from the program.

## EXEMPTIONS

Individuals are exempt from work requirements if they are:

- Under 16 or over 60 years old;
- “Unfit for employment” due to a mental or physical disability;
- Receiving unemployment insurance or TANF benefits and complying with the job search or work requirements of that program;
- Parents or caregivers with dependents six years old or younger, or caregivers for an incapacitated person;
- Participating in a drug or alcohol treatment program;
- Employed or self-employed for at least 30 hours a week; or
- Enrolled at least half-time in school, training, or another institution of higher education.

The federal government does not define “unfit for employment.” Federal regulations require states to set their own definitions and procedures for verification but prohibit states from being less restrictive than the comparable definitions for TANF.<sup>19</sup>

## PEOPLE INELIGIBLE FOR EXEMPTIONS

Individuals who do not qualify for any of these exemptions are often referred to as “work registrants.” Work registrants must:

- Register as looking for work (typically with the state SNAP agency or employment services);
- Participate in SNAP E&T, if required;
- Accept a “suitable” job if offered one; and
- Have not voluntarily quit their job.

States may sanction work registrants assigned to an E&T activity if they do not participate.

People enrolled in SNAP who are exempt from work registration may volunteer to participate in an E&T component but cannot lose their SNAP benefits for nonparticipation in E&T. In some states, however, individuals who receive both SNAP and TANF benefits can lose their SNAP benefits for failing to comply with TANF work requirements, even though they are exempt from mandatory SNAP E&T.

## MANDATORY E&T PROGRAMS ARE INEFFECTIVE

Research shows that work requirements do not lead to permanent jobs or economic security. In a 2021 National Bureau of Economic Research working paper, researchers determined that work requirements have a small and insignificant effect on employment. In other words, work requirements reduce access to benefits for vulnerable populations but do not demonstrably lead to improvement in labor market outcomes.<sup>20</sup>

Similarly, Vericker, et. al., found time limit reinstatement reduced SNAP participation but did not improve employment or earnings.<sup>21</sup> Some policymakers argue that work requirements effectively reduce the need for SNAP. Evidence is clear that this narrative is far from the truth.

Mandated work programs take away benefits from people who are unable to comply with unreasonable rules designed to deny them access to essential nutrition support.<sup>22</sup> Instead of spending time working, looking for jobs, caring for their families, or engaging in training and education, people must comply with arbitrary rules.

## MANDATORY E&T PROGRAMS ARE ALSO GROUNDED IN RACISM

Work requirements are rooted in the harmful and false perception that people experiencing poverty do not want to work. This mindset stems from a long history of racialized narratives that illustrate people of color as the face of poverty. Such narratives have been employed to undermine support from white Americans for public assistance programs.

The truth is that most people using SNAP benefits who can work, do work.<sup>23</sup> Reports from the U.S. Government Accountability Office and the U.S. Census Bureau found that the majority of families who receive SNAP have at least one employed individual in the household.<sup>24</sup>

Work requirements also stem from the false narrative of who is “deserving” or “undeserving” to receive financial support. Many hold the belief that poverty is a personal choice or a reflection of one’s character.



However, poverty is not a reflection of the person or people experiencing it. Rather, poverty is inextricably tied to structures of oppression, racism, misogyny, and classism.<sup>25</sup>

Work requirements make public benefit programs less accessible and more burdensome for people needing help. They disproportionately affect Black, Indigenous, and Latino families. Conditioning SNAP benefits on participation in workforce training programs denies people in need access to essential nutrition support.<sup>26</sup>

## **MANDATORY PROGRAMS CAUSE DISPROPORTIONATE HARM DUE TO RACISM AND OTHER SYSTEMIC BARRIERS TO EMPLOYMENT**

SNAP eligibility and food security should not be predicated on employment or participation in training or job placement programs. Workforce development and training programs like SNAP E&T should target SNAP participants who often face systemic racism and structural barriers to employment without compromising their food security.

Best practices for workforce development programs to overcome the effects of systemic racism include:

- Ensuring programs have funding for supportive services like child care, transportation, and housing;
- Partnering with community-based organizations and non-profits to support participants; and
- Partnering with labor unions to ensure there are pipelines into good jobs.

## **STRUCTURAL RACISM DRIVES UNEMPLOYMENT**

Systemic racism has real economic implications for people of color in this country. People of color face greater incarceration rates due to unfair criminalization, employment discrimination, occupational segregation, and racial income disparities.

They are also more likely to live in neighborhoods with fewer job opportunities and more barriers to transportation.

Due to these and other systemic barriers, people of color face higher unemployment rates than their white peers. The Black unemployment rate is persistently double the white unemployment rate, even during periods of low unemployment.

For example, even in a historically tight labor market, Black workers remain twice as likely to be as unemployed as white workers. In 2022, on average:

- The Black unemployment rate was 6.2 percent;
- The Latino unemployment rate was 4.3 percent; and
- The white unemployment rate was 3.1 percent.

As a result of systematic racial discrimination that has produced economic inequities, SNAP E&T programs should not compromise a person's food security.



## STATES ARE INCREASINGLY MOVING TO VOLUNTARY E&T PROGRAMS

States have the option to operate E&T programs that are mandatory, voluntary, or both. States may have mandatory E&T programs in some counties and voluntary programs elsewhere. Or the program may be mandatory only for specific populations.

Regardless of their political leanings, states have increasingly shifted toward running voluntary programs. Leaders are recognizing that the costs of running mandatory programs exceed their benefits.

## TIME LIMITS FOR ABLE-BODIED ADULTS WITHOUT DEPENDENTS (ABAWDS)

A subgroup of work registrants faces additional threats to food security. They are sometimes referred to as “able-bodied adults without dependents” or ABAWDs. People fall into this categorization if they:

- Are between 18 and 50 years old (recent debt ceiling agreement temporarily expands this requirement to adults up to age 54);
- Do not live in a household with a minor child (or are pregnant); and
- Do not have a documented disability.

Adults considered to be ABAWDs are subject to an additional provision that generally limits them to receiving SNAP for no more than 3 months in a 36-month period unless they are working or participating in a SNAP E&T activity for at least 20 hours per week. People who lose benefits due to this restriction may not regain eligibility until they have worked for 30 days—or if they are in training 20 hours per week to maintain eligibility.

There is a key distinction between the ABAWD time limit and the general work requirement for work registrants. The ABAWD time limit applies even if people using SNAP are not offered the opportunity to work or participate in a SNAP E&T activity. By contrast, people can only be sanctioned under the general work requirement if they are offered the opportunity to participate in SNAP E&T and do not do so. People who are exempted from the time limit restriction are still able to access SNAP E&T services. In other words, exempting people from time limits does not make them ineligible for SNAP E&T.

Many, but not all, states prioritize people at risk of losing benefits under ABAWD restrictions.<sup>27</sup> States that pledge to provide work activities to this population can qualify for a share of additional 100 percent federal SNAP E&T funding. However, even with this federal support, SNAP E&T funding is extremely limited compared to the number of individuals who could potentially be eligible for services. States that have committed to serving all ABAWDs have typically provided low-intensity services to offer them all a slot.

## STATE WAIVERS TO SUSPEND THE ABAWD TIME LIMIT

States may request a waiver of the ABAWD time limits for areas of high unemployment, ranging from the whole state to distinct areas. This condition can be shown by an unemployment rate of over 10 percent. Other data can also demonstrate high joblessness, such as an area being determined a Labor Surplus Area by the U.S. Department of Labor, a low and declining employment-to-population ratio, or a 24-month average unemployment rate of 20 percent above the national average for the same period.<sup>28</sup>

These waivers are not automatic; states must request them. Some states, such as Mississippi, Kansas, Oklahoma, Arkansas, North Carolina, South Carolina, Florida, and West Virginia, have enacted legislation that prohibits them from requesting waivers regardless of economic circumstances. States may also choose to request waivers for only some areas that qualify.

The Trump Administration promulgated regulations in 2019 that would have severely limited the ability of states to request waivers. However, this rule was overturned by the U.S. District Court for the District of Columbia. In 2021, FNS formally removed the regulations.<sup>29</sup>

If waivers are not issued statewide, or in all areas of a state that qualify, the time limits can disproportionately harm communities of color. In 2015, Ohio Governor John Kasich was accused of only requesting waivers for rural counties in southeastern parts of the state. This tactic put an unfair burden on communities of color who lived in the state's big cities where the time limit remained in effect, even though they also had high unemployment rates.<sup>30</sup>

## SNAP AND COLLEGE STUDENTS

**Under SNAP standard eligibility, students attending college more than part time are not eligible to receive benefits unless they meet an exemption, such as having young children or working 20 hours or more per week. However, in the Consolidated Appropriations Act of 2021, Congress temporarily expanded SNAP benefits to otherwise eligible students.<sup>31</sup> The legislation included students who either participate in the work-study program or have an “expected family contribution” of \$0 according to their Free Application for Federal Student Aid (FAFSA) form.**

**Beginning May 11, 2023, the temporary student exemptions began to phase out, impacting students as they are due for recertification. Many of these students will qualify for SNAP based on another exemption, and states should check to see if they do before ending their benefits. For example, if students are enrolled in college as part of SNAP E&T, they are exempt from the student restrictions.**

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## CHANGES TO STATE WAIVERS IN THE COVID-19 PANDEMIC

Under the Families First Coronavirus Response Act (FFCRA), Congress temporarily suspended the ABAWD time limit until the end of the month after the month in which the COVID-19 Public Health Emergency (PHE) is lifted. Because the PHE ended on May 11, 2023, the ABAWD time limits returned on July 1, 2023.

During the PHE, states could not apply the time limit to people subject to ABAWD rules unless they were offered a SNAP E&T activity and did not comply. In addition, FFCRA requires all states to reset “countable” months for the time limit to zero when it is reinstated. This reset applies to all people subject to the ABAWD policy, allowing everyone to start with a clean slate.<sup>32</sup>

Even though the ABAWD limits have been suspended in recent years, states have still been able to request waivers. As of the third quarter of FY 2023, 17 states and territories were approved for statewide waivers and another 9 were granted partial waivers.<sup>33</sup> Waivers are generally approved for a period of 12 months.

In addition to these general waivers of the time limit due to unemployment, states may exempt up to 12 percent of those ineligible due to the ABAWD requirement from the time limit by using “discretionary exemptions.” Unused discretionary exemptions can be carried over from year to year.



We already have enough barriers stacked against us. This help [employment and training programs] are giving us a leg up and putting us on the same footing as other members in society.

**Marvin, Ohio**

## POTENTIAL FOR SUCCESS: OPPORTUNITIES FOR IMPROVEMENT

Voluntary SNAP E&T programs have the potential to promote economic security for individuals receiving SNAP. Research shows that some voluntary programs appear to successfully increase employment and earnings. Findings from the 2014 SNAP E&T pilots authorized by the Agricultural Act of 2014 showed that mandatory programs have the opposite effect.

Data from the pilots revealed that participants who were subject to the threat of sanctions in the mandatory programs were less likely to receive SNAP and did not experience an increase in earnings.<sup>34</sup>

Effective employment and training programs are resource intensive, and it is not efficient to spend these resources on people who have not chosen to be there. Most critically, voluntary SNAP E&T programs do not subject individuals to sanctions that increase food insecurity.

## RECOMMENDATIONS TO IMPROVE E&T PROGRAM DESIGN

When designing SNAP E&T programs, SNAP agencies should consult with the experts at their state's department of labor, labor unions, worker centers, community-based organizations, community colleges, and other organizations representing working people. These individuals are familiar with the state's labor market trends and the strategies needed to address labor market inequities.

States seeking to start 50/50 third-party partnerships for the first time should seek out organizations already providing quality services to individuals receiving SNAP and provide technical assistance to onboard them as partners. In addition, SNAP administrators must carefully assess potential third-party partners to determine whether providers could effectively fill that role.

State agencies should seek organizations with work and learning environments that are safe, caring, and inclusive for all participants and employees. SNAP must avoid creating programs that promote policing as a means of compliance.

States should also work to expand individuals served by voluntary E&T programs. At its best, intentional design and implementation—including access to wrap-around supportive services such as child care, transportation, and subsidies for required tools and uniforms—can make it possible for individuals to seek, obtain, and keep jobs. These services, coupled with quality training programs, can lead to better-paying jobs.

## IMPROVING E&T PROGRAMS BY STRENGTHENING FUNDING

Workforce development remains chronically underfunded. Lawmakers who want to help individuals secure employment opportunities can increase investments in workforce programs proven to strengthen economic opportunity and security.

Such funding opportunities may include:

- Subsidized and transitional employment programs;
- Registered apprenticeships;
- Pre-apprenticeships;
- Youth apprenticeships; and
- Support for institutions, like community colleges, that are proven to help job seekers.

Workforce education, training, and development should not, however, be a barrier to food security.

Successful voluntary E&T programs can offer individuals a chance to learn new skills and increase their employment opportunities. SNAP eligibility workers must provide case management and create tailored, individualized plans with participants that align closely with their strengths and goals. Doing so is important to prevent mismatching and participant disengagement.

Employment and training services should also be closely matched to local labor market demands and community needs to ensure program participation can lead to gainful employment.

## STRATEGIES TO IMPROVE SCREENING AND REFERRAL

In recent years, FNS has been providing guidance to states and supporting a range of technical assistance grants to try to strengthen the services provided under E&T. These efforts also aimed to ensure that SNAP E&T programs are not just a hurdle that people must overcome to keep their benefits, but that they provide meaningful services that contribute to participants' economic success.

If states are operating mandatory SNAP E&T programs, they are required to appropriately screen participants before referring them to employment and training programs. It is vital to determine where the individual will be most successful and if the suggested program will be beneficial.

People receiving SNAP are more likely to be successful when placed in a program that closely aligns with their interests, abilities, and needs. If a person is placed in a position requiring them to perform tasks they are not equipped to do, it makes success less likely—resulting in a possible sanction and loss of benefits. The screening and referral process should not put people at risk of losing their benefits.

Eligibility workers should follow FNS screening and referral guidance carefully and with intention.<sup>35</sup> A few questions to consider before referral:

- Are there openings in this program?
- Would this program be beneficial for the participant? Does it align with the person's goals, interests, and abilities?
- Does this program support quality, equitable, and culturally appropriate training services?
- Does this option lead to jobs that provide sustainable pay and wages?
- Will this participant be successful in this program? Do they have everything they need to be successful (transportation, child care, etc.)?

## FEDERAL APPROACHES TO STRENGTHEN SNAP E&T ENROLLMENT

In addition, eligibility workers must gather and share all necessary information during the enrollment process. Individuals can also lose benefits because eligibility criteria or next steps were not clearly communicated or were not designed to inform them of their required participation in SNAP E&T.<sup>36</sup>

FNS should develop and share with states a model notice about the steps that participants must take to retain their benefits. Prior to release, the notice should be user-tested for plain language and clear information.

## PROGRAMMATIC RECOMMENDATIONS TO MOVE SNAP E&T IN AN ANTI-RACIST DIRECTION

- Eliminate work requirements and sanctions.
- Acknowledge the racist roots of work requirements and the effects on the program's administration and implementation. Change the narrative around people experiencing poverty. SNAP agencies should work toward this goal and create shared, anti-racist language that is used by staff and partners. Poverty is not an individual choice. For communities of color, which are disproportionately likely to experience poverty, it is a result of a long history of racist local, state, and federal laws and policies.

- Train workers in trauma-informed services. State administrators of SNAP and other public benefits programs must support using a trauma-informed lens to meet everyone’s needs.
  - Administrators should use feedback loops to gather input directly from individuals receiving SNAP on the agency’s effectiveness, its customer service, and asset-based language that focuses on the strengths and potential of an individual.
  - They should conduct mandatory and ongoing unconscious bias training for workers in their agency. Understanding this shift in behavior and policy takes time and intentionality.<sup>37</sup> Practicing skills of empathy, respect, transparency, collaboration, and more can eliminate the re-traumatization of people receiving SNAP and staff.
- Conduct comprehensive, personal evaluations of people seeking SNAP E&T services to gain an accurate perspective of their skills, needs, goals, and aspirations. It is important to put the individual at the center, affirm their dignity, and respect their choices. Then, the agency worker and the person using SNAP should make a joint decision about which SNAP E&T component is most needed and where they will be most successful.
- Engage in progressive, productive, third-party partnerships with community-based organizations, community colleges, and universities, among others. These partners should be high-quality providers that have good outcomes and positive connections with employers.

## LEGISLATIVE RECOMMENDATIONS

### **1. Congress should remove all mandatory work requirements from SNAP eligibility.**

Remove state options to make SNAP E&T programs mandatory. The evidence is overwhelming that mandatory E&T programs do not increase employment or economic security. They simply act as a barrier to food access for people who already face discrimination in the labor market.

Until this barrier is lifted, FNS should closely track and make publicly available demographic data of people sanctioned from SNAP due to work requirements, including, but not limited to their race, ethnicity, gender, age, parental status, and census tract.

### **2. Congress should eliminate the ABAWD time limit.**

Under legislative changes made in 1996, most working-age adults without minor children, often referred to as ABAWDs, can only access SNAP for three months out of every three years. They are exempt from this restriction if they have a documented disability or report 20 hours of work or related activities each week. States are not required to provide them with a work activity that meets these requirements. A job search alone does not count.

This policy cuts off hundreds of thousands of unemployed people from food assistance when they need it most. It disproportionately impacts people of color who face structural racism in the labor market and beyond; have higher rates of unemployment; and are more likely to be employed in part-time, precarious jobs with highly variable hours of work. Racial bias in health care, including pain assessment and treatment recommendations, can also affect a person’s ability to receive exemptions based on health conditions.

If federal policymakers do not repeal the time limit entirely, they must, at a minimum, update policy for associated waivers in areas of high unemployment. These should be made mandatory, not a state option.

### **3. Congress should specify that income earned through SNAP E&T and WIOA programs be disregarded when determining SNAP eligibility.**

The 2018 Farm Bill reauthorization allowed for SNAP E&T programs to provide subsidized employment to SNAP recipients. Subsidized employment is a proven strategy to help move individuals with barriers to employment into stable jobs. Simply put, individuals in need of food security and who have barriers to higher-wage employment cannot afford to step away from the workforce to engage in unpaid skills training.

However, the wages people earn in these programs count against their access to SNAP benefits. That is, SNAP E&T and WIOA participants who receive SNAP benefits risk losing critical nutrition support because of the wages earned through training or temporary job placement. Additionally, SNAP receipt in the month of E&T participation is generally required. States may be hesitant to offer quality, wage-paying E&T if an individual loses access to SNAP, and therefore to SNAP E&T, before completing the program.

FNS has said that it does not believe it has the authority to allow states to disregard income earned by people receiving SNAP through SNAP E&T or WIOA programs when calculating SNAP benefits, therefore legislative change is needed.

There is precedent for disregarding income from work to maintain eligibility for public benefits programs. For example, the Social Security Ticket to Work program allows employed Social Security Disability Insurance and Supplemental Security Income recipients to maintain benefits and Medicaid/Medicare eligibility even if their income from work rises above the threshold.

## **ADMINISTRATIVE RECOMMENDATIONS**

### **FNS should publicly report data on SNAP E&T participants and the types of jobs available through SNAP E&T programs.**

FNS currently requires states to report information on employment outcomes for SNAP E&T programs, but this information has not been publicly released. This data should be disaggregated by program within E&T, including data on race and other demographic information of participants. FNS should make this data public on an annual basis.

Additionally, SNAP E&T programs should be required to report on the characteristics of the jobs that participants obtain, including industry, wages, and benefits.

## **STATE AGENCY RECOMMENDATIONS**

### **SNAP agencies should include impacted individuals in the policy-making process, including in creating their E&T plans.**

To help set policy, SNAP agencies should hire employees with work experience in SNAP E&T programs or implement steering committees led by individuals with program experience. These individuals have lived expertise in navigating SNAP and are acutely aware of the actual impact of policies on their lives. They can provide public benefit agencies with a critical and missing perspective essential to improving services.



## CONCLUSION

For people with low incomes, SNAP can be a lifeline to stave off hunger and deeper economic hardship. Federal and state policies, however, can interfere in this critical access to nutrition. Mandating participation in SNAP E&T programs, with limited exceptions, can present significant hurdles to many families with low incomes. For adults struggling financially, falling under the ABAWD regulation's arbitrary three-month limit is another steep barrier to food security.

Research is clear that mandating participation in E&T programs is ineffective. This ties up state resources without yielding any savings or workforce expansions.

These E&T programs also perpetuate structural racism and stereotypes about people experiencing poverty. Due to decades of systemic discrimination tied to race, class, and other forms of oppression, these rules most hurt Black, Indigenous, Latino, and other people of color. They stop food assistance when people need it most.

Federal and state decision-makers can lift barriers to SNAP benefits while improving program effectiveness. Congressional approaches include ending the ABAWD cutoff and the mandatory nature of E&T programs—investing instead in voluntary programs. Federal agencies can also better support comprehensive screening, referral, and enrollment services for people using SNAP benefits.

At the state level, policymakers can engage people who have used SNAP benefits in organizational decision-making. In addition, leaders can take steps to dismantle racism and classism within agencies that administer SNAP.

By adopting the recommendations in this report, policymakers can bolster food security and support a healthier workforce. Lifting barriers to SNAP benefits will help more people with low incomes access crucial assistance when needed and make progress in eliminating racism within the program. It will help people move toward fulfilling jobs and economic security, gains that are good for families, communities, and states.

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