

A SNAP in Time: ABAWD Work Requirements

Justin Shaw^{1,2} and Neal H. Hooker¹

¹ John Glenn College of Public Affairs, The Ohio State University

² Columbus Jewish Federation, Columbus, Ohio

Contact Author

Dr. Neal H. Hooker, Professor of Food Policy

John Glenn College of Public Affairs

The Ohio State University

Columbus, OH

hooker.27@osu.edu

Mr. Justin Shaw, Advocacy Manager

Columbus Jewish Federation, Columbus, OH

Working Paper

John Glenn College of Public Affairs

September, 2016

A SNAP in Time: ABAWD Work Requirements

Abstract

Time limits on SNAP eligibility are being reintroduced. Using county administrative data from Franklin County, Ohio for FFY 2015 the able-bodied adult without dependent (ABAWD) population is described. Most at risk for food insecurity this group faces the strictest work requirements. 32% of the total 43,000 clients served by SNAP were not covered by a work exemption (60% male). The largest exempt group was 30-39 females, with a dependent child 6-18 years old. Implications are presented for those in the 20+ states reintroducing time limits in 2016. Broader concerns over the non-profit emergency feeding networks in these states are discussed.

Keywords

Benefit eligibility, Time limits, Work requirements

JEL Codes

H 53, I 38, Q 18

A SNAP in Time: ABAWD Work Requirements

Introduction

Every human being needs to have food to sustain life. This is an undisputed fact and it is a basic right that all deserve, but can't always secure. For individuals in poverty, food is less accessible and affordable. There are many public and private programs and charities that assist individuals in securing food, but none can match the ability of the federal government to serve this population. The largest food aid program is the Supplemental Nutrition Assistance Program (SNAP), touching nearly one in seven Americans - 45 million on average each month in 2015 (USDA 2016a). Although extensive in service coverage, SNAP does include restrictions on access through means-testing for financial eligibility, citizenship or legal permanent residence, and work requirements (Klerman and Danielson 2011).

Able-bodied adults without dependents (ABAWD) have the strictest work requirements and time limitations imposed as a qualification of receiving assistance. Failure to comply with the work requirements will limit benefits to just three months in a three-year span. It is troublesome to deny food assistance to those in that population who are actively seeking employment and are willing to take any job but aren't able to secure one. Since the rules' inception in *The Personal Responsibility and Work Opportunity Reconciliation Act of 1996* (PRWORA) the ABAWD work requirements and time limits have been controversial issues when reauthorizing SNAP.

Although states can and do offer opportunities in employment and training programs, there are generally not enough spots for everyone. Those who are not able to find a training or employment placement face the consequences of time limits. Waivers to time limits are available to states under qualifying circumstances, such as high unemployment (Bolen et. al. 2016).

Importantly, states and more precisely counties with increased SNAP recipients during and following the Great Recession are not those with traditionally high levels of need or food insecurity (Slack and Myers 2014). Thus the emergency non-profit feeding networks, the administrative, and employment and training infrastructures may be lacking precisely where they are needed the most (Tschoepe and Hinderer 1998). This may, in part, explain the longevity of client need seen even with declining overall unemployment rates.

The “ABAWD rule”, as it has been termed, is explored in this paper, ultimately through the lens of Ohio’s capital county Franklin. An early changing and large county example, the state-level waiver expired for Ohio at the start of 2014 and was not renewed. As a result SNAP county administrators across Ohio had to address the needs of recipients and help them find employment or training programs or face the consequences of losing access to benefits (OAF 2015). Franklin County was chosen to showcase the effects of these changes as it shares many demographic similarities with communities continuing to experience food insecurity making it a microcosm of the United States.

We hope to inform the applied economics and practitioner audience in those states and comparable communities transitioning from waivers in 2016 and discuss the broader implications for the management of time limits for SNAP eligibility and the resultant risk to food insecurity. The history and structure of SNAP, and the ABAWD rule are introduced. Previous studies of work requirements and time limits are reviewed, and serve to illustrate whether history is repeating itself in Franklin County since the waiver’s expiration.

ABAWD Rule History

The ABAWD rule began in 1996 when Congress introduced the largest overhaul to

welfare since the creation of *Aid to Families with Dependent Children* in the 1930s. PRWORA, signed into law by President Bill Clinton, instituted the Temporary Assistance for Needy Families (TANF) program along with other reforms to benefits including the Food Stamp Program, now known as SNAP. Work requirements, applied to many of the welfare programs, were the cornerstone of the new legislation and from the start have been contentious on both sides of the aisle.

Out of all the work requirements contained in PRWORA, it was the specific language applied to the ABAWD population that proved to be most controversial. As author of the provision, then Rep. John Kasich (R-Ohio) defended the work requirements on the House floor saying, “it’s not complicated. There is not a reason that I can think of as to why you should not be able to put in twenty hours a week if you are able-bodied, between the age of 18 to 50, in exchange for that program” (142 Cong. Rec. H7905 1996). He went on to say that states would offer programs with jobs and states could also seek waivers.

SNAP Overview

SNAP is administered by the Food and Nutrition Service (FNS), United States Department of Agriculture (USDA). SNAP specifically receives authorization through the Farm Bill, negotiated roughly every five years by Congress. The most recent version, H.R. 2642 - *The Agricultural Act* of 2014, was signed into law in February 2014. The program is currently authorized through FFY 2018 (Agricultural Act of 2014 §2027). In FFY 2014 SNAP total costs were just over \$74 billion (USDA 2016a).

Access to SNAP is contingent upon means-testing for financial eligibility, citizenship or legal permanent residence, and work requirements. Eligibility determination begins with

household composition. Households typically consist of an individual or a group of individuals (regardless of relationship to one another) if resources are combined to purchase food (Aussenberg 2014). A group may apply as an individual household if it purchases meals separately unless they are spouses, parents and children under 21, and minors under 18 who live with a caretaker (excluding foster care situations).

There are two pathways to financial eligibility determination; a ‘traditional’ one and categorical eligibility. The general income guidelines, with some restrictions, refer to those at or below 130% of the federal poverty level (USDA 2015b). In the ‘traditional’ pathway both the household’s gross and net monthly income are counted. Through categorical eligibility, a household that is entirely composed of individuals who already receive other federal entitlement programs such as Temporary Assistance for Needy Families (TANF) or Supplemental Security Income cash assistance may automatically qualify for SNAP benefits without the financial means tests (Aussenberg 2014). Along with other welfare application changes it is argued that such administrative improvements increase the precision of eligibility determination (Hetling et al., 2014) Certain non-citizens may also participate in the SNAP program if they meet the two requirements of being a qualified alien plus one additional condition (USDA 2011).

The last component of program eligibility is the work requirements imposed on most able-bodied adults (with or without dependents). Able-bodied adults are defined as anyone over the age of 15 and under the age of 60 who are both physically and mentally fit. Work requirements vary by state, but there are minimum conditions that must be met for this segment of the population. All able-bodied adults must register for employment or participate in an employment and training program, accept employment if offered and must not quit a job or reduce work effort without good cause (Agricultural Act of 2014 §2015). Special requirements

are also applied to the able-bodied adults without dependents, which will be explored in a subsequent section.

SNAP provides a much needed income transfer to eligible individuals and families by directly paying for certain food and beverages such as bread, fruits and vegetables, and meats and poultry but not items such as alcohol, household supplies, or hot foods. While not uniform, there is strong evidence that food assistance programs help alleviate food insecurity (Gundersen et al., 2011). Benefits are calculated based on the household composition and net monthly income. In FFY 2014 the national average monthly benefit per person was \$125. Since 2004, all fifty states, the District of Columbia, Puerto Rico, the Virgin Islands, and Guam have utilized Electronic Benefit Transfer (EBT) as a means of directly transferring money from the federal government to the retailer (USDA 2015a). Each participant is able to utilize the benefits issued via a debit-like card (EBT).

ABAWD Rules

The major change to the Food Stamp program as a result of PRWORA was the imposition of time limits for ABAWD. The law limits ABAWD to three months out of a thirty-six month period unless certain work requirements are met. The participant must work twenty hours per week, participate in an employment and training program for at least twenty hours per week, or participate in a state “workfare” program. Individuals can be exempt from the requirements, but only if they meet one of the specific reasons outlined in table 1.

[Table 1 here]

Waivers may be requested by states to be exempted from the time limits. The Secretary of Agriculture may waive time limits if the area qualifies under specific criteria. These include one of the following; a recent 12-month unemployment rate above 10 percent, a recent 3-month unemployment rate above 10 percent, qualification for extended unemployment benefits, designation as a Labor Surplus Area by the U.S. Department of Labor, or a recent 24-month average unemployment rate 20 percent above the national average for the same 24-month period. States or territories may apply for partial waivers either for a selected period of time or for certain areas within the state.

In healthier economic times most states qualify only for partial waivers. Table 2 depicts the use of the waiver before and after the recession, which peaked around FFY 2010. In 2009, The *American Recovery and Reinvestment Act* of 2009 (ARRA) suspended the ABAWD time limits and eased restrictions on access to SNAP (American Recovery and Reinvestment Act of 2009). After the suspension in ARRA was lifted there has been a reduction in statewide waivers. However, with slow economic growth, many states still qualify for a full statewide waiver. Many Governors made the decision to let their statewide waiver expire and pursue only partial (county or other administrative area level) waivers.

[Table 2 here]

In the 2nd quarter of FFY 2016, only ten states still have a full statewide waiver. That number decreased drastically from FFY 2015. For those states that are re-imposing the time limits for ABAWD, recipients must find work or risk losing benefits. Not every state commits to providing employment and training opportunities for all. Table 3 shows a distribution of waivers

across the fifty states, District of Columbia, Guam, and Virgin Islands. Of the sixteen states without any waivers, only two – Delaware and Texas – offer work slots to everyone.

[Table 3 here]

As noted, very few states offer employment and training slots or “workfare” programs to everyone, meaning that ABAWD must find a way to complete required hours on their own. For the ABAWD who can complete a workfare program to meet their required hours expectations are reduced (Agricultural Act of 2014 §2029). The hours the participant must work is calculated by dividing the amount of SNAP benefits by the state’s minimum wage. As noted previously the national average benefit per person in 2014 was \$125 a month, in 2015 in Ohio it was \$131/month. A person receiving that amount in Ohio (minimum wage is \$8.10/hour) would only be required to complete approximately 16 hours of workfare per month to maintain SNAP eligibility.

Previous Studies

After the implementation of PRWORA, little was known about the effects on ABAWD participants. USDA conducted a study two years after passage in 1998 to understand the demographics of the population. In 1996, only 3.8% of all food stamp program participants, equating to roughly 941,000 participants, were subject to the new requirements (Stavrianos and Nixon 1998). However, only 4.7% of those work-required participants were actually compliant, which meant that approximately 892,000 participants were at risk of losing benefits within three months (Stavrianos and Nixon 1998). What set ABAWD apart from the general food stamp

population, according to the study, was the fact that they were more likely to be male, live in smaller households, and have lower income. However, what was identical was the education level. Roughly 40% of all food stamp recipients did not have a high school degree or equivalent. Hoynes and Schanzenbach (2012) and Baum (2008) provide evidence that female-headed households may be more likely to respond to benefit changes, suggesting impacts of time limits on male ABAWD will be distinct.

According to the 1998 USDA study, the job prospects for ABAWD were grim. They pointed out that ABAWD would be competing for “a small set of jobs within the nation’s labor market... [because]... populations are concentrated in terms of location, skill, and other socioeconomic characteristics” (Stavrianos and Nixon 1998). Given the low skill sets of ABAWD, they speculated that even if “willing to work, they may be unable to do so because there are not enough jobs for low-skilled workers” (Stavrianos and Nixon 1998). If jobs were available, they would most likely be in the retail trade and service industries – most of which would be white-collar, clerical positions.

A second study forecasted the impact the newly established ABAWD work requirements might have on both food expenditures and dietary quality. The study found that a loss of food assistance “without a compensating increase in other income, will certainly have a negative impact” possibly reducing food expenditures 32-38% in the affected households (Kramer-LeBlanc et al. 1997). The authors used the USDA’s Healthy Eating Index (HEI) as a tool to quantify dietary quality. They found that loss of food assistance led to a 26% reduction in household HEI (Kramer-LeBlanc et al. 1997). It should be noted though there has been no follow up studies to test these projections after the law took full effect.

Cuyahoga County, Ohio conducted a similar study to the 1998 USDA report to determine

the effects of the rule change. The intent was to track how many ABAWD met the time limits and how they adjusted to the changes. The study used data from the county's Income Maintenance, Job Opportunities and Basic Skills files. They also conducted interviews between October 1997 and February 1998 with a sample of 252 clients (Gallagher et al. 1998). However, they conceded the research was limited "due to the administrative data available to research welfare recipients" (Gallagher et al. 1998). The data suggest that most individuals were indeed cut off from food stamps after three months. Out of the more than 6,200 people identified as being ABAWD in January 1997, 83% were cut off by April 1997. The rate of return to the program was very low, roughly 77% of those cut off did not re-enroll within that fiscal year. However, two-thirds of all those cut off were not found to be working within that year. A similar result is found with South Carolina data (Ribar et al. 2010) who found that SNAP use declined in the ABAWD population but that exit from benefits wasn't always associated with earnings. The impact on self-sufficiency of the time limits this remains uncertain.

The Cuyahoga County study also found that the time limits had a negative effect on the social welfare network within the county. Most respondents noted that they turned to food pantries. Prior to termination, no one ate their meals at a soup kitchen; after termination, 9% reported visiting soup kitchens (Gallagher et al. 1998). The overall percentage of those eating their meals at home dropped from 92% to 66% once benefits were terminated. Perhaps most alarming is that only a quarter had reported feeling hungry often while they received food stamps, a figure which more than doubled to 54% after termination.

Decline in program participants after PRWORA was not limited to Cuyahoga County and history is now repeating itself. In a 2001 letter to Senator Richard Lugar (R-IN) from the U.S. General Accounting Office, participation of ABAWD in food stamps was described as dropping

rapidly; from an average of 1.13 million in FFY 1996 to 362,000 in FFY 1999 (Robertson, 2001). Initial findings show that since the ARRA expiration, states' enrollment numbers where a waiver expired has mimicked the decline seen after the initial enactment of PRWORA. Kansas let their waiver lapse at the start of FFY 2014. Initially on average 3,000 to 4,000 participants exited per month but after the expiration of the ABAWD waiver that number increased to roughly 15,000 participants per month (Bolen et al. 2016).

Franklin County, Ohio as a Microcosm of America

Ohio's statewide waiver expired at the beginning of FFY 2014, and by January 2014 the first wave of sanctions and case closures had to begin in all but sixteen of Ohio's eighty-eight counties (Wente 2013). Ohio had a full statewide waiver for FFY 2011-2013 following the ARRA suspension using the emergency unemployment compensation clause. All sixteen counties covered under the partial waiver were rural with less than 100,000 residents. Thirteen of the counties are in southeastern Ohio and are considered part of "Appalachian Ohio." These counties were exempted because "in each of these, the 24-month average unemployment rate was greater than 120 percent of the national unemployment rate during the same 24-month average" (Wente 2013). Of broader impact agencies in the eight metropolitan counties within Ohio had to ensure thousands on their rolls were employed or had access to a training program.

This struggle was pronounced for larger counties that have a higher burden placed on their social services networks. In Franklin County (Columbus), Ohio the economic conditions improved for some but not for all. The population of Franklin County, the 32nd largest populous county in the U.S., has risen at a faster pace than most other counties in Ohio and will soon eclipse Cuyahoga County (Cleveland) as the largest in the state. Cuyahoga County lost

population between the 2010 census and the 2015 estimated census (Census 2015). Franklin County, however, is more the norm in terms of population growth. Out of the top 100 most populous counties, accounting for roughly 42% of the entire U.S. population, only three, including Cuyahoga, have lost population (Census 2015).

On the surface it may appear Franklin County, like so many other large counties across the country, has recovered when in fact it is far from true. As the population of Franklin County has grown so too has the number of people in poverty. According to census data, the percentage of people in poverty increased between 2010 and 2014 by one percentage point to 18% (Census, 2014). At the same time the unemployment rate has dropped significantly from 9.9% in January 2010 to 6.0% in January 2014 to 4.6% in January 2016 (BLS 2016). Although unemployment has fallen the data do not distinguish between full time and part time employment so underemployed and discouraged workers are not captured (ODJFS 2015a). Regardless, there is still a pronounced need in the county with one in six people receiving food assistance (Census 2014). That equates to nearly 203,000 people who received food assistance in 2015 at an average individual benefit level of only \$131 a month. Only 13% of those individuals also received public assistance from TANF (ODJFS 2015b).

Metropolitan counties in the states who saw their waiver expire in 2016 share many characteristics with Franklin County, which should serve as a bellwether for those grappling with the changes. Four similar sized counties to Franklin in four very diverse regions of the country exemplify these similarities: Mecklenburg County (Charlotte), NC, Multnomah County (Portland), OR, Allegheny County (Pittsburgh), PA, and Shelby County (Memphis), TN. All four counties have comparable demographics and saw unemployment rates decrease while poverty rose. In the period of 2010 to 2014 the unemployment rate across the four counties dropped on

average 3.5% (range 2.2-5.1%) making the rate 6.7% (range 6.2-7.8%) (BLS, 2016). Yet in the same period these same counties saw on average a 2% increase (range 1.2-3%) in the rate of poverty to an average of 16.5% living in poverty (range 10.8-21.3%) (Census 2014).

In Franklin County, it was initially thought that approximately 15,000 ABAWD would be impacted by the removal of the waiver. A spokesman for the county's Department of Job and Family Service said candidly, "We don't have nearly enough places for 15,000 people to work" (Candisky 2013). In order to serve ABAWD who didn't have employment or "Work Experience Program" (WEP) placements, Franklin County contracted with the Ohio Association of Food Banks (OAF). For FFY 2016, OAF received \$560,000 to manage WEP for ABAWD. Compare this to the TANF WEP, ResCare Workforce Services has a contract with the county for \$3.5 million to serve a significantly smaller population, roughly a thousand work-required individuals per month (Franklin County Board of Commissioner Resolutions, No.0784-15 and 0721-15). With limited funding, Franklin County and OAF have an administrative burden of serving the ABAWD population that isn't present with TANF WEP clients. As Ewalt and Jennings note in their study of TANF recipients it is difficult to implement policy when there is limited buy-in or support. They highlight that, "administrative commitments, reflected in attitudes and orientations, can provide an important link between policy goals and policy outcomes" (Ewalt and Jennings 2004 458). A further indication of administrative commitment is the level of funding.

Due to administrative burdens and limited funding, Franklin County struggles to assign new participants within their three-month time limits. For those individuals who applied in June 2015 only 32.5% of those work-required were assigned timely to OAF. Clearly, not all those who were assigned necessarily completed their hours. The status of the individuals who were not

assigned in time is unknown; it is assumed that Franklin County did not sanction those individuals due to their administrative burden. These factors make it particularly difficult for clients to find employment, suggesting a need for training programs which can mitigate the barriers for these clients.

OAF conducted a survey of the unemployed work required ABAWD in order to understand the clients they would be serving (OAF 2015). The results were very similar to the national studies conducted in the late 1990s described above. The work-required ABAWD face many barriers in Franklin County. The participants were predominantly male and uneducated. Just over 30% of respondents did not graduate high school (OAF 2015). Roughly 30% also responded that they had a physical or mental limitation, but were not exempted from the requirements (OAF 2015). According to OAF, “35.3% of the clients in [the] program have felony convictions; some clients have multiple felonies, or a combination of felonies and misdemeanors” (OAF 2015).

OAF estimates roughly 50% are sanctioned each month and moved off the SNAP rolls (OAF 2015). Nearly half of the clients left the program because they failed to complete their hours and were sanctioned. Only 25% left the program because they found employment (OAF 2015). The remainder left because of miscommunications, difficulty with transportation, and other time barriers.

Data Analysis

The analysis conducted in this section utilizes data obtained from the Franklin County Department of Job and Family Services (FCDJFS) for ABAWD during FFY 2015 (FCDJFS 2015). The data set contains administrative records for individuals being served under the

program including status - whether or not they are subject to ABAWD work requirements - as well as other pertinent demographic information. Over the course of the year, Franklin County served an unduplicated (unique) count of 43,662 ABAWD, both work required and exempt (Table 4). Of all participants per month a quarter are work-required. An almost equal number, roughly 2,500 individuals, enter and exit the program each month. All of the following statistics regarding the unduplicated count of individuals are a reflection of status in the first month they entered the program.

[Table 4 here]

There are limitations to the data provided by FCDJFS that need to be noted. The data include some able-bodied adults who have dependents over the age of 6. They are included because they are subject to the general SNAP work requirements and are considered to be an ABAWD with a qualifying exemption. There is some margin of error with the accuracy of the data, estimated by FCDJFS staff to be no more than 5%. This is due to technological limitations for FCDJFS systems and some human error in data entry.

The demographics of the unduplicated count of ABAWD being served in Franklin County during FFY 2015 were quite diverse. The population included a high proportion of women. Three out of every four women participating in the program were exempt from the ABAWD work requirements. 60% of all the women who were exempt were due to having a dependent child over the age of 6. For males, only 47% of those with an exemption had a dependent child over the age of 6. The number of participants disaggregated by age tells an interesting story. There is a large number of individuals between the ages of 18 and 21, but most

have a qualifying exemption. The number of participants drops after age 21 but starts to increase and peaks again around 33-36. When broken down by gender in figures 1 and 2, different patterns emerge. While both females and males drop off significantly after the age of 21, females begin to return at a higher rate than males.

[Figure 1 here]

[Figure 2 here]

For females, this increase after age of 21 seems to be explained by those having children over the age of 6. This group would still be work required but would not be subjected to the ABAWD specific work requirements and time limits. In the age group of 30-33, females and males both have most of their exemptions due to dependents; however a notable difference is that 80% of the total female population in that age range is exempted due to that specific reason compared to only half of the males.

What these numbers could signal is that the re-institution of the ABAWD work requirements will have a strong gender effect on food insecurity. Females most likely qualify for a time limit exemption at a higher rate due to pregnancy, but then move off the ABAWD list until their children reach age 6 (Table 5). That means they most likely retain food assistance. As the male participant population is lower than the female population by the ages of 30-33, this implies that those truly without dependents will have a barrier to accessing food assistance due to the reintroduction of work requirements.

[Table 5 here]

A sample of participation among the entire unduplicated population was taken at the beginning of FFY 15 in October 2014 (before the waiver was removed), then at April 2015 (first group of three month time limits), and finally at the end of the fiscal year in September 2015. Using this information, trends in participation over the course of the year can be assessed to determine the effects of the ABAWD work requirements on the SNAP recipient population in Franklin County (Table 6). Unfortunately, one of the data set's greatest limitations is the lack of reasons why individuals exit the program for example if they were unable to complete their hours.

[Table 6 here]

The majority (54%) of the ABAWD population eventually moved off SNAP by year's end and didn't return. Three quarters of those who remained on food assistance by the end of the year were exempt from the ABAWD work requirements. There is an important difference between those who were work required and those who were exempt. Half of all those who were exempt remained on food assistance while only 30% of those work required stayed on. However, what both work required and exempt individuals had in common is that once they moved off, they only rarely returned to the program. The data broken down by gender is not shown, but the results were very similar, showing little difference in participation dynamics by gender but rather a difference between being ABAWD work required and exempt.

Conclusion

Little has changed for the SNAP eligible ABAWD population over the last twenty years since the enactment of PRWORA. Those being served have remained predominately male and low educated. This population has very low job skill-sets and many other barriers to employment which make competing for a limited number of jobs and even training programs challenging or impossible. This makes it very difficult to comply with work requirements. What the Franklin County, Ohio data shows is that once individuals leave the program they rarely return. This is a microcosm of the increasing population of food insecurity at the county level and not just in Franklin County. At a higher rate those who exit are those who are ABAWD work required. Unfortunately the limited funding that Franklin County receives, like many other communities, makes it impossible to adequately serve everyone (and everyone timely) in a workfare program. Those who suffer are most at risk of losing SNAP benefits. If the intent of PRWORA was to lift individuals up and out of poverty by advancing the skills and work opportunities of those participants, it is not immediately clear that the re-introduction of the ABAWD work requirement given the continuing challenging employment environment will accomplish that goal (Gritter 2015).

Food is a basic and fundamental right that every person deserves. SNAP's ability to feed those who are low-income, is unmatched by any charity. The time limits and the work requirements imposed are the strictest of any program for childless adults. As the research shows, the population being served and made to follow these rules face many barriers. While states should and sometimes do provide employment and training opportunities, it is not always practical. The time limits imposed upon ABAWD threaten the ability of those who want to work and can't to access food. Although a few states and counties continue to use waivers, it is only a

short-term solution when the economy remains challenging for the low-skilled workers most at risk. The only long-term solution is for Congress to ease these restrictions and ensure thousands are able to continue to access food assistance. Alternatively, efforts should promote fully funding employment and training programs to ensure that all at risk of reaching the three month time limit are able to find a workfare place (Bolen et al. 2016). Else, state and county SNAP managers around the country will be faced with dramatically increasing numbers of clients losing benefits and the emergency non-profit feeding networks in the 20+ states that re-introduced time limits in 2016 will be under increasing pressure to help the most indigent Americans combat food insecurity.

Works Cited

- 142 Cong. Rec. H7905 (daily ed. Jul. 18, 1996) (statement of Rep. Kasich).
- Agricultural Act of 2014, 7 U.S. Code § 2015 (2014).
- Agricultural Act of 2014, 7 U.S. Code § 2027 (2014).
- Agricultural Act of 2014, 7 U.S. Code § 2029 (2014).
- American Recovery and Reinvestment Act of 2009, Pub. L. No. 111-5 § 2, 123 Stat. 121 (2009).
- Aussenberg, R.A. 2014. Supplemental Nutrition Assistance Program (SNAP): A Primer on Eligibility and Benefit (CRS Report No. R42505). Washington, DC: Congressional Research Service. <https://www.fas.org/sgp/crs/misc/R42505.pdf>.
- Baum, C. 2008. The Effects of Food Stamps on Exiting Welfare and Becoming Employed for Welfare Recipients. Discussion Paper DP 2008-03, University of Kentucky Center for Poverty Research. www.ukcpr.org
- Bolen, E., D. Schroeder, and K. Link. 2013. *The Return of the ABAWD*. Washington, DC: American Association of SNAP Directors, PowerPoint slides, 32 slides.
- Bolen, E., D. Rosenbaum, S. Dean and B. Keith-Jennings. 2016. More than 500, 000 Adults will Lose SNAP Benefits in 2016 as Waivers Expire. Center on Budget and Policy Priorities. www.cbpp.org/research/.
- Candisky, C. 2013. "Kasich wants able-bodied adults to work for food stamps." *The Columbus Dispatch*. <http://www.dispatch.com/content/stories/local/2013/09/07/fit-no-kids-youll-have-to-work-for-food-stamps.html>.
- Congressional Research Service. 2012. "FY2007-FY2012: Able-bodied Adults without Dependents (ABAWD) Requirements, Statistics, and Waivers." Memorandum to Representative Eric Cantor.
- Ewalt, J.A., and E.T. Jennings, Jr. 2004. Administration, Governance, and Policy Tools in Welfare Policy Implementation. *Public Administration Review* 64(4): 449-462.
- Franklin County Department of Job and Family Services (FCDJFS). 2015. *Monthly ABAWD Demographic Reports*. Distributed by Ohio Department of Job and Family Services Business Intelligence Channel database.
- Franklin County Ohio Board of Commissioners, Res. No. 0721-15. (September 29, 2015).
- Franklin County Ohio Board of Commissioners, Res. No. 0784-15. (October 27, 2015).
- Gallagher, P., C. Coulton, C. Proctor, M. Su, and T. Wonghongkul. 1998. *Able Bodied Adults Without Dependents in Cuyahoga County: The Impact of Food Stamp Time Limits*. Cleveland, OH: Center on Urban Poverty and Social Change, Case Western University.

- Gritter, M. 2015. *The Policy and Politics of Food Stamps*. New York: Palgrave Macmillan.
- Gundersen, C., B. Kreider, and J. Pepper. 2011. "The Economics of Food Insecurity in the United States." *Applied Economic Perspectives and Policy*. 33(3), 281-303.
- Hetling, A., S. Watson, and M. Horgan. 2014. "We Live in a Technological Era, Whether You Like It or Not": Client Perspectives and Online Welfare Applications. *Administration & Society*. 46(5), 519-547.
- Hoynes, W.H. and W.D. Schanzenbach. 2012. Work Incentives and the Food Stamp Program. *Journal of Public Economics*. 96, 151-162.
- Klerman, J.A. and C. Danielson. 2011. The Transformation of the Supplemental Nutrition Assistance Program. *Journal of Policy Analysis and Management*. 30(4): 863-888.
- Kramer-LeBlanc, C., P.P. Basiotis, and E.T. Kennedy. 1997. Maintaining Food and Nutrition Security in the United States with Welfare Reform. *American Journal of Agricultural Economics* 79(5): 1600-1607.
- Ohio Association of Food Banks (OAF). 2015. *A Comprehensive Assessment of Able-Bodied Adults Without Dependents and Their Participation in the Work Experience Program in Franklin County, Ohio Report 2015*. Report. Columbus, OH: Ohio Association of Food Banks. <http://ohiofoodbanks.org/wep/WEP-2013-2015-report.pdf>.
- Ohio Department of Job and Family Services (ODJFS). 2015a. *Unemployment Rate Methodology*. Report. Columbus, OH: Ohio Department of Job and Family Services, 2015. http://jfs.ohio.gov/pams/Reports/PAMS_SFY-2015.stm.
- . 2015b. *Public Assistance Monthly Statistics Report*. Report. Columbus, OH: Ohio Department of Job and Family Services. http://ohiolmi.com/laus/UR_Methodology2015.pdf.
- Ribar, D.C., M. Edelhoach, and Q. Liu. 2010. Food Stamp Participation among Adult-Only Households.. *Southern Economic Journal*. 77(2), 244-270.
- Robertson, R. 2001. *Food Stamp Program: Implementation of the Employment and Training Program for Able-Bodied Adults Without Dependents*. Letter. Washington, DC: General Accounting Office.
- Slack, T. and C.A. Myers. 2014. The Great Recession and the Changing Geography of Food Stamp Receipt. *Population Research Policy Review*. 33(1): 63-79.
- Stavrianos, M. and L. Nixon. 1998. *The Effect of Welfare Reform on Able-Bodied Food Stamp Recipients*. Washington, DC: United States Department of Agriculture and Mathematica Policy Research, Inc. <http://www.fns.usda.gov/sites/default/files/finalrep.pdf>
- Tschoepe, G.J. and J.J. Hinder. 1998. Explaining State Food Stamp Caseload Variance: Does State Administration Matter? *Administration & Society*. 30(1), 53-61.

- U.S. Census Bureau (Census). 2014. "2010-2014 American Community Survey 5-Year Estimates: Franklin County, OH." Selected Economic Characteristics DP03. <http://factfinder2.census.gov/>.
- . 2015. "Annual Estimates of the Resident Population: April 1, 2010 to July 1, 2015." Washington, DC: U.S. Census Bureau. Retrieved from <http://factfinder2.census.gov/>.
- U.S. Department of Agriculture, Food and Nutrition Service (USDA). 2015a. "General Electronic Benefit Transfer Information." <http://www.fns.usda.gov/ebt/general-electronic-benefit-transfer-ebt-information>.
- . 2015b. "Supplemental Nutrition Assistance Program (SNAP) Eligibility." <http://www.fns.usda.gov/snap/eligibility>.
- . 2016a. "Supplemental Nutrition Assistance Program Participation and Costs." <http://www.fns.usda.gov/sites/default/files/pd/SNAPsummary.pdf>.
- . 2016b. "Supplemental Nutrition Assistance Program (SNAP) Waiver Status." [http://www.fns.usda.gov/sites/default/files/snap/FY 2016-Quarter-2-ABAWD-Time-Limit-Waiver-Status.pdf](http://www.fns.usda.gov/sites/default/files/snap/FY%202016-Quarter-2-ABAWD-Time-Limit-Waiver-Status.pdf).
- . 2011. *Supplemental Nutrition Assistance Program Guidance on Non-Citizen Eligibility*. Washington, DC: U.S. Department of Agriculture, Food and Nutrition Service. http://www.fns.usda.gov/sites/default/files/Non-Citizen_Guidance_063011.pdf.
- U.S. Department of Labor, Bureau of Labor Statistics (BLS). 2016. "Local Area Unemployment Statistics." 12-month change in unemployment rates by county, not seasonally adjusted. <http://data.bls.gov/map/MapToolServlet/>.
- Wente, Kara. 2013. *Federal Fiscal Year 2014: Able Bodied Adults Without Dependents*. Memorandum. Columbus, OH: Ohio Department of Job and Family Services. <http://jfs.ohio.gov/ofam/pdf/Family-Assistance-Letter--127.stm>.

Table 1. Qualified exemptions to work requirements for ABAWD and SNAP participants

| ABAWD Specific Exemptions | |
|---|---|
| Under 18 or over 50 years of age | A parent or other member of a household with responsibility for a dependent child |
| Certified medically as physically or mentally unfit for employment | Pregnant woman |
| General Exemptions to SNAP Work Requirements (Applicable to ABAWDs) | |
| Currently subjected to and in compliance with work requirements for TANF | A regular participant in a drug addiction or alcoholic treatment and rehabilitation program |
| A parent or other member of a household with responsibility for the care of a dependent child under age six or of an incapacitated person | Employed a minimum of thirty hours per week or receiving weekly earnings which equal the minimum hourly rate |
| A student enrolled at least half time in any recognized school, training program, or institution of higher education | Between the ages of 16 and 18 and is not a head of a household or who is attending school, or enrolled in an employment training program, on at least a half-time basis |

Source: Agricultural Act of 2014, 7 U.S. Code § 2015 (2014).

Table 2. Number of states utilizing statewide and partial waivers FFY07-16

| FFY | States with Statewide Waivers | States with Partial Waivers |
|------------|--------------------------------------|------------------------------------|
| 2007 | 8 | 39 |
| 2008 | 8 | 38 |
| 2009 | 12 | 35 |
| 2010 | ARRA Suspension | |
| 2011 | 47 | 5 |
| 2012 | 47 | 5 |
| 2013 | 40 | 3 |
| 2014 | 34 | 10 |
| 2015 | 31 | 13 |
| 2016 | 10 | 27 |

Source: Congressional Research Service. “FY2007-FY2012: Able-bodied Adults without Dependents (ABAWD) Requirements, Statistics, and Waivers.” Memorandum to Representative Eric Cantor, 2012.

Bolen, Ed, Daniel Schroeder, and Kathy Link. *The Return of the ABAWD*. Washington, DC: American Association of SNAP Directors, PowerPoint slides, 32 slides.

Table 3. Time limit waiver status by state for ABAWD FFY 2016 – Q2

| Full State ABAWD time limit waivers – (10) | | |
|--|----------------------|----------------|
| California | Nevada | Guam |
| Illinois | Rhode Island | Virgin Islands |
| Louisiana | South Carolina | |
| Michigan | District of Columbia | |
| Partial State ABAWD time limit waivers – (27) (either to certain areas of the State or for a portion of the fiscal year) | | |
| Alabama | Massachusetts | Ohio |
| Alaska | Hawaii | Oregon |
| Arizona | Minnesota | Pennsylvania |
| Colorado | Montana | South Dakota |
| Connecticut | New Hampshire | Utah |
| Georgia | New Mexico | Vermont |
| Idaho | New York | Virginia |
| Kentucky | North Carolina | Washington |
| Maryland | North Dakota | West Virginia |
| States without ABAWD time limit waivers – (16) | | |
| Arkansas | Maine | Tennessee |
| Delaware | Mississippi | Texas |
| Florida | Missouri | Wisconsin |
| Iowa | Nebraska | Wyoming |
| Indiana | New Jersey | |
| Kansas | Oklahoma | |

Source: United States Department of Agriculture, Food and Nutrition Service. “Supplemental Nutrition Assistance Program (SNAP) Waiver Status.” last modified January 14 2016, [http://www.fns.usda.gov/sites/default/files/snap/FY 2016-Quarter-2-ABAWD-Time-Limit-Waiver-Status.pdf](http://www.fns.usda.gov/sites/default/files/snap/FY%2016-Quarter-2-ABAWD-Time-Limit-Waiver-Status.pdf).

Table 4. Total number of participants by work requirement per month FFY 2015

| FFY 15 Status | Average Monthly Total | Total Year Unduplicated Count (Status at 1st month of participation) |
|---------------------------------------|------------------------------|--|
| ABAWD Work Required | 5264 | 13918 |
| Exempt Total | 15820 | 29744 |
| Age (under 18 and over 50) | 4967 | 8214 |
| Dependent over the age of 6 | 8722 | 16283 |
| Pregnant | 330 | 1030 |
| Medical | 13 | 66 |
| Other Child in the Home <18 years old | 1656 | 3587 |
| Enrolled in school | 13 | 49 |
| Work Investment Act Participant | 5 | 28 |
| Exempt (no listed reason) | 116 | 487 |
| Total | 21085 | 43662 |
| % ABAWD Work Required | 25.0% | 31.9% |
| % Exempt | 75.0% | 68.1% |

Table 5. Comparison of male vs. female for two age groups

| | Females | | Males | |
|---|----------------|--------------|--------------|--------------|
| | 18-21 | 30-33 | 18-21 | 30-33 |
| Total Population | 2735 | 2615 | 2752 | 2204 |
| ABAWD Work Required | 995 | 480 | 1092 | 1026 |
| Dependent over age of 6 and/or pregnant exemption | 521 | 2089 | 161 | 1082 |
| All other exemptions | 1219 | 46 | 1499 | 96 |
| % of total exemptions due to having dependents | 29.9% | 97.8% | 9.7% | 91.9% |
| % of total population exempted due to having dependents | 19.0% | 79.9% | 5.9% | 49.1% |

Table 6. Total population served in FFY 2015 by status at years end

| | ABAWD Work Required | % ABAWD Work Required | Exempt | % Exempt | Status Change | % Status Change | Total |
|------------------------------|------------------------------------|--|---------------|---------------------|--------------------------|--------------------------------|--------------|
| Stayed on | 4017 | 20.8% | 14837 | 76.9% | 452 | 2.3% | 19306 |
| % Stayed on | 29.6% | | 50.6% | | 59.1% | | 44.2% |
| Moved off didn't return | 9312 | 39.7% | 13918 | 59.3% | 222 | 0.9% | 23452 |
| % Moved off didn't return | 68.6% | | 47.5% | | 29.0% | | 53.7% |
| Moved off and returned | 241 | 26.7% | 572 | 63.3% | 91 | 10.1% | 904 |
| % Moved off and returned | 1.8% | | 2.0% | | 11.9% | | 2.1% |
| Total | 13570 | 31.1% | 29327 | 67.2% | 765 | 1.8% | 43662 |

Figure 1. Female participation by age

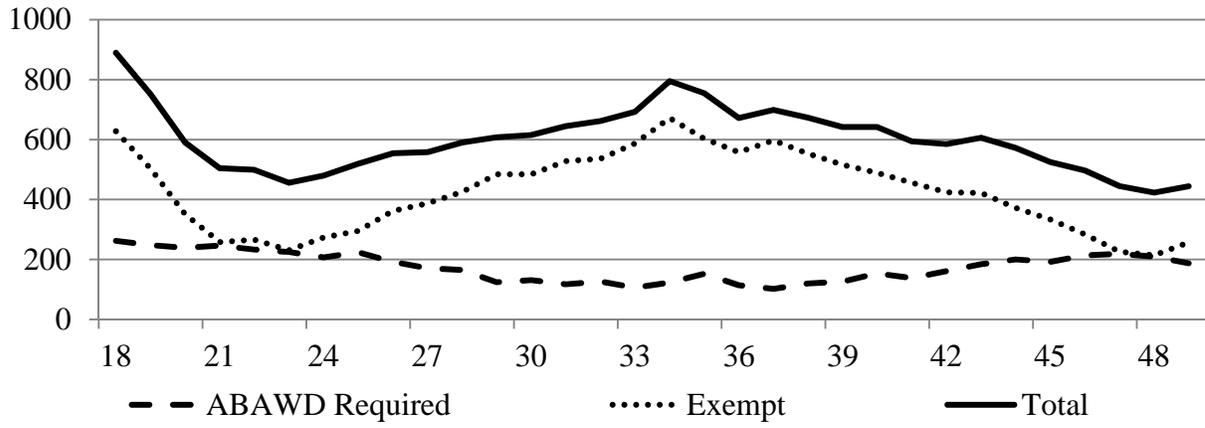


Figure 2. Male participation by age

