



Using SNAP E&T to Offer Job-Driven Training for Able-Bodied Adults without Dependents (ABAWDs)

POLICY BRIEF 2

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SNAP E&T and ABAWDs: Distinct, but Related Policies

As State ABAWD waivers expire, the clock is now ticking on a 3-month time limit—many people will soon lose their benefits unless they meet special work requirements which had been waived in many parts of the country in recent years. Today, few States have a waiver in place because they either do not qualify for one due to an improving economy or have decided not to pursue a waiver. Policymakers, program administrators, and advocates are looking to the SNAP Employment & Training (E&T) program as a way to connect ABAWDs to activities that will help them meet work requirements and continue to receive the nutrition assistance they need. This brief summarizes the ABAWD time limit, clarifies the relationship between ABAWD policy and the SNAP E&T program, and highlights the potential—and limits—of SNAP E&T in responding to the needs of ABAWDs. It clarifies that States are not required to run mandatory E&T programs to serve ABAWDs and that the program is one tool among many for ABAWDs at risk of losing benefits. The most promising role for SNAP E&T may be to offer job-driven education and training services, opening a path for ABAWDs to transition from the program the right way: by becoming self-sufficient through better paying jobs.

What is the ABAWD Time Limit and Why is it Urgent to Address it?¹

Under Federal law, able-bodied adults without dependents (ABAWDs) may only receive SNAP benefits for 3 months in a three-year period unless they are working at least 80 hours per month, participating in qualifying education and training activities at least 80 hours per month, or complying with a workfare program.

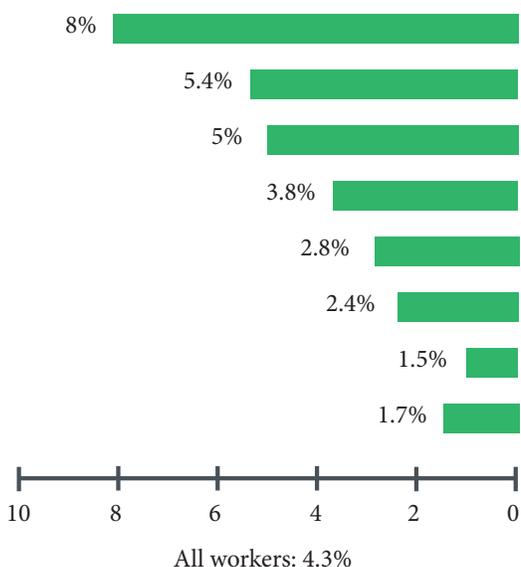
This time-limit applies to people who are:

- Age 18 - 49;
- Fit for employment;
- Not living in a household with a minor;
- Not pregnant; and
- Not already exempt from general work requirements.

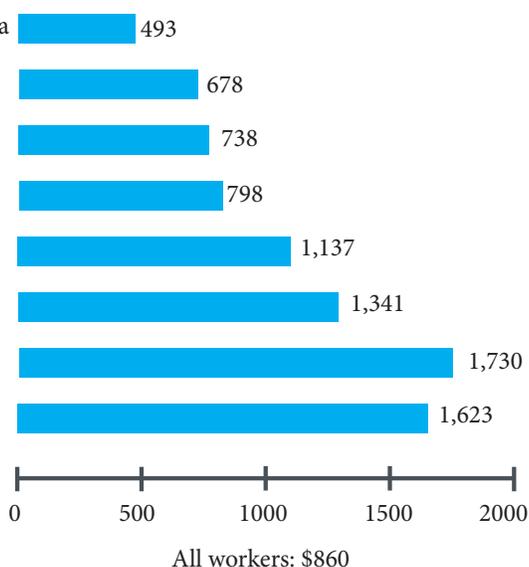
Over the past 10 years, almost every State has chosen to use a temporary waiver of the three-month time limit because of high unemployment or lack of sufficient jobs. Many statewide waivers expired at the end of 2015 due to an improving economy. As a result, ABAWDs in 43 States² are now subject to the time limit (though partial waivers continue in some areas). In addition to rigorous screening for exemptions and careful tracking of ABAWDs, the Food and Nutrition Service (FNS) strongly encourages States to connect ABAWDs with jobs, qualifying education and training activities, and workfare programs so that they can continue to access nutritious food while they look for work.

Many of the individuals at risk of losing SNAP benefits due to the time limit face obstacles to finding stable employment, including low skills. A recent analysis of SNAP data found that one in four ABAWDs lacks a high school diploma and half have no education beyond high school.³ Individuals with a high school diploma or less earn far less on average and are much more likely to be unemployed than those with postsecondary credentials.⁴ Not surprisingly, those likely to lose eligibility have very low average monthly incomes (about 17 percent of the poverty line) and typically are not eligible for other income support.⁵

Unemployment Rate in 2015



Median Weekly Earnings in 2015



Note: Data are for persons age 25 and over. Earnings are for full-time wage and salary workers.
 Source: Current Population Survey, U.S. Bureau of Labor Statistics, U.S. Department of Labor

Promising Strategies for Serving ABAWDs⁶

- ◇ Assess the need by estimating the number of ABAWDs in the State or affected counties⁷
- ◇ Evaluate what qualifying components already exist, such as WIOA and Trade Act programs, SNAP E&T, and workfare
- ◇ Examine the capacity of existing public and private programs to meet the need
- ◇ Consider State system and operational requirements, such as how the State will:
 - Track countable months
 - Track the 36-month period
 - Identify potential ABAWDs and individuals exempt from the time limit
 - Recognize and document acceptable work activities, including existing qualifying work, education and training, and workfare hours
 - Inform ABAWDs about the requirements and what they need to do⁸
- ◇ Check the number of 15 percent exemptions and develop a strategy for their use
- ◇ Build long-term capacity to expand opportunities for ABAWDs, including:
 - Work with private and public entities to expand workfare and qualifying work programs
 - Add job-driven SNAP E&T components such as adult education contextualized to careers, postsecondary education and training for in-demand jobs, and on-the-job training

What is SNAP E&T and what services can it provide?⁹

The SNAP E&T program helps SNAP participants build their basic education and job skills and gain work experience in order to improve their employment prospects and reduce their need for nutrition assistance. SNAP E&T is a package of services that includes participant assessment, employment and training activities, and supportive services. States have substantial flexibility to tailor SNAP E&T programs to meet local needs but must include at least one of the following components: 1) job search/job search training; 2) workfare; 3) work experience (e.g. on-the-job training, apprenticeships); 4) self-employment; 5) education (including basic skills, English language learning, or literacy directly linked to employment); 6) vocational training; and 7) job retention services. States also have considerable latitude to decide which SNAP participants to serve in SNAP E&T, including whether participation will be mandatory or voluntary.

There are three sources of SNAP E&T funding. All States receive a share of \$90 million total in annual Federal formula grants (known as 100 percent funds) to operate SNAP E&T programs, a very modest amount relative to the number of SNAP participants who could potentially benefit from E&T services. There is also an additional \$20 million total available nationally to States that pledge to serve all at-risk ABAWDs facing time limits.

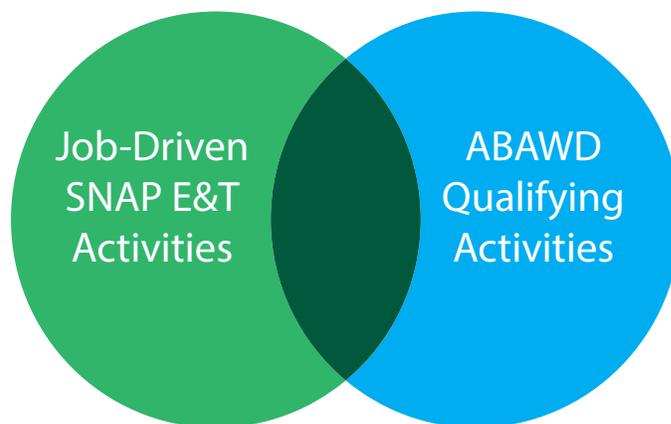
Currently five States receive this funding. In recent years, States have increasingly chosen to expand SNAP E&T funding—and the program’s reach and impact—by opting to use the third E&T funding source, “50-50 funding.” States can be reimbursed 50 percent for SNAP E&T program costs and participant supports paid for with State dollars or with other non-Federal funds put up by “third-party” providers (such as community colleges or community-based organizations) through State agreements. Different rules apply to these funding sources. Both 100 percent and 50-50 funds can cover administrative and direct program costs (e.g. tuition and fees, case management, job development), but only 50-50 funds can be used for individual supportive services such as transportation, books and supplies, and dependent care.¹⁰

Using SNAP E&T Strategically to Serve ABAWDs

SNAP E&T has tremendous potential to grow and improve its effectiveness, especially through third-party reimbursement arrangements, but the current reality is that State programs are generally small, serving in 2012 approximately five percent of the SNAP participants expected to work (known as work registrants). SNAP E&T’s small scale relative to the size of the ABAWD population makes it especially important that States think strategically about the role the program can play in responding to the ABAWD challenge relative to other programs, such as those funded under the Workforce Innovation and Opportunity Act (WIOA). The Departments of Agriculture and Labor recently issued a joint letter encouraging SNAP agencies and State and local workforce agencies to develop shared strategies for connecting SNAP participants, especially ABAWDs, to employment and training opportunities through American Job Centers.¹¹ **In determining E&T’s role, States with ABAWDs facing time limits should be aware that they are not required to run mandatory SNAP E&T programs; on the contrary, voluntary programs can offer States the flexibility to provide services to ABAWDs who are in a position to benefit from them—while saving States both administrative complexity and unnecessary costs.**

Think of SNAP E&T as One Tool for Helping ABAWDs, Not the Whole Toolbox

SNAP E&T is one tool that States have to help ABAWDs meet work requirements while simultaneously attaining education and skills, but currently SNAP E&T cannot be the whole solution. Once States have assessed the number and characteristics of ABAWDs, they can begin to identify potential State and community partners, including those running programs funded under WIOA that can serve ABAWDs in qualifying activities appropriate to their needs. States should map the full array of State and community resources to identify which service gaps SNAP E&T can fill and which activities other programs may be better able to provide.¹² For example, participation in a workforce program funded under WIOA is considered a qualifying activity for the purposes of maintaining SNAP eligibility for ABAWDs.



Voluntary, Job-Driven E&T Programs Make Sense for ABAWDs, Too

States have several compelling reasons for establishing SNAP E&T as a job-driven program for SNAP participants—including ABAWDs:

- First, States can move away from low intensity, low impact services to higher quality, higher impact services that better address a SNAP participant’s needs, such as lack of in-demand skills and credentials. Moreover, E&T job search or job search training components are not qualifying activities for ABAWDs. However, job search and job search training, when offered as part of other E&T components, are acceptable as long as those activities comprise less than half of the total required time spent in the components.¹³
- Second, voluntary programs may reduce administrative complexity and cost.
- Third, job-driven SNAP E&T programs hold the most promise for creating a viable third-party provider model that can leverage other resources and expand SNAP E&T quality and capacity—something that the ABAWD population urgently needs.
- Fourth, a voluntary, job-driven SNAP E&T approach may help States improve performance on the types of employment, earnings, and activity completion measures included in new Congressionally-mandated reporting requirements.¹⁴

JOB-DRIVEN E&T CHECKLIST¹⁵

- ✓ **ENGAGE EMPLOYERS.** Work up-front with employers to determine local hiring needs and design training programs that respond to those needs.
- ✓ **EARN AND LEARN.** Offer work-based learning opportunities with employers – on-the-job training, internships, pre-apprenticeships, and Registered Apprenticeships.
- ✓ **SMART CHOICES.** Make better use of data to drive accountability, inform what programs are offered and what is taught, and offer user-friendly information for job seekers to choose programs and pathways.
- ✓ **MEASURING MATTERS.** Measure and evaluate employment and earnings outcomes.
- ✓ **STEPPING STONES.** Promote a seamless progression from one educational stepping stone to another, and across work-based training and education, so individuals’ efforts result in progress.
- ✓ **OPENING DOORS.** Break down barriers to accessing job-driven training and hiring for any American who is willing to work, including access to supportive services and career guidance.
- ✓ **REGIONAL PARTNERSHIPS.** Coordinate American Job Centers, local employers, education and training providers, economic development agencies, and other public and private entities, to make the most of limited resources.

States seeking to create job-driven E&T programs that also assist the ABAWD population can—

- Repurpose a portion of 100 percent SNAP E&T funds to increase State administrative capacity to jumpstart innovation in SNAP E&T policy and practice. This could include assessing the capacity of potential third-party reimbursement partners for expanding specific SNAP E&T activities for ABAWDs in the near and long terms.
- Update their State SNAP E&T Plan to include a broad array of evidence-based employment and training activities, including ones that are qualifying activities for ABAWDs subject to the time limit.
- Build job-driven elements into SNAP E&T, including qualifying activities for ABAWDs, and avoid simply using E&T funds to offer low intensity, low impact employment and training services. This could include, for example, creating career pathway adult education opportunities that are contextualized to job skills and lead to high school completion and/or postsecondary occupational credentials.
- Conduct outreach to eligible participants, including through expanded case management and community partners.
- Adopt a third-party reimbursement model utilizing administrative 50-50 funding. This funding is flexible and can help to fill in resource gaps for quality, job-driven services that States can target toward work registrants, ABAWDs, or others. Such programs have the capacity to increase participants' earning potential and are one promising way to serve ABAWDs in the long run. To ensure the effective and efficient use of 50-50 funds, States seeking to expand E&T services in this way should consider creating a centralized State or county process for SNAP E&T eligibility/billing, reporting, and monitoring.

Conclusion

In 2016, the number of ABAWDs at risk of losing SNAP eligibility due to time limits dramatically increased. States are encouraged to help connect ABAWDs with jobs, volunteer opportunities, qualifying education and training activities, and workfare programs so that they can continue to access nutritious food while they look for work. SNAP E&T programs can help to meet the needs of ABAWDs but many other resources, such as programs funded under WIOA, are also needed. States should think strategically about how best to use SNAP E&T to serve ABAWDs facing the time limit. They have flexibility to do so because States with ABAWDs subject to the time limit are not required to run mandatory SNAP E&T programs and can choose to offer job-driven education and training services that may lead to more stable employment and better jobs.

ENDNOTES

1. For additional information on the time limit and serving ABAWDs, see *Guide to Serving ABAWDs Subject to Time-limited Participation 2015* (Food and Nutrition Service, U.S. Department of Agriculture, http://www.fns.usda.gov/sites/default/files/Guide_to_Serving_ABAWDs_Subject_to_Time_Limit.pdf).
2. Food and Nutrition Service, U.S. Department of Agriculture, waiver status as of 4/1/2016, <http://www.fns.usda.gov/sites/default/files/snap/fy-2016-quarter-3-abawd-waiver-status.pdf>.
3. Bolen, Ed, Dorothy Rosenbaum, Stacy Dean, and Brynne-Keith Jennings. *More Than 500,000 Adults Will Lose SNAP Benefits in 2016 as Waivers End*. January 21, 2016. Washington, DC: Center on Budget and Policy Priorities.
4. "Earnings and Unemployment Rates by Educational Attainment," Bureau of Labor Statistics, 3/15/16. http://www.bls.gov/emp/ep_chart_001.htm.
5. Bolen et al, 2016.
6. Adapted from *Guide to Serving ABAWDs Subject to Time-limited Participation*.
7. At-risk ABAWDs are those who are in their third countable month and at risk of losing their SNAP eligibility due to the time limit.
8. For additional ABAWD resources, see <http://www.fns.usda.gov/snap/able-bodied-adults-without-dependents-abawds>. These include FAQs about the ABAWD time limit written for participants (<http://www.fns.usda.gov/sites/default/files/snap/ABAWDS-1-2016.pdf>).
9. For a detailed overview of the SNAP E&T program, see Kaz, David. *Why Now Is The Time for States to Build Their SNAP E&T Programs*. Alexandria, VA: U.S. Department of Agriculture, April 2016. http://www.fns.usda.gov/sites/default/files/snap/S2SBrief1_NowIsTheTimeforBuildingSNAPETPrograms.pdf.
10. For more information on SNAP E&T funding, see Kaz, 2016.
11. U.S. Departments of Labor and Agriculture, Joint Letter on Partnering to Help Connect Low-Income Able-bodied Adults to the Public Workforce System, March 31, 2016: <http://www.fns.usda.gov/sites/default/files/snap/USDA-DOL-letter-ABAWDs.pdf>.
12. For further detail, see Kaz, 2016.
13. An exception to this is job search and job search training activities that are included in WIOA or Trade Act programs. Such programs are allowable.
14. For details see the Interim Final Rule published in the Federal Register March 23, 2016 (<https://www.federalregister.gov/articles/2016/03/24/2016-06549/supplemental-nutrition-assistance-program-snap-employment-and-training-program-monitoring-oversight>).
15. Adapted from *Ready to Work: Job-Driven Training and American Opportunity* (The White House, 2014, https://www.whitehouse.gov/sites/default/files/skills_report_072014_2.pdf).



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