

Preparing for SNAP's 3-Month Time Limit

September 2016

Stacy Dean and Ed Bolen

Center on Budget and Policy Priorities



Morning Agenda

- Welcome & Introductions
- Overview – The Rule, Exemptions & Eligibility
- Who is Affected
- Key Pre-Implementation Issues
 - Waiver rules
 - Statewide clock
 - Identifying ABAWDs
 - Notifying and Engaging ABAWDs
- Q and A



First, What is an A.B.A.W.D. ?

Able-**B**odied **A**dult **W**ithout **D**ependents

USDA term for the population subject to the time limit



Overview: The Rule

- Benefits are limited to 3 full months per 3 year period to an individual.
- Unless the individual:
 - is working 20 hours a week,
 - is in a qualifying job slot 20 hours a week or doing workfare, or
 - meets one of the limited exemptions
- Or, is exempt.



Who Is Exempt from the Rule?

- Under 18 or 50 years old or older,
- Residing in household with a member under 18,
- Pregnant,
- Physically or mentally “unfit for work”, or
- Already exempt from SNAP work requirements
 - Responsible for the care of a child under 6 or an incapacitated person,
 - Receiving (or applied for) unemployment compensation,
 - Participating in a drug or alcohol rehab program, or
 - Is a student enrolled at least half time.



Additional Option: Individual Exemptions

- States may exempt individuals up to 15 percent of the State's ABAWD caseload subject to the time limit.
- One exemption equals one individual for one month
- Can be used to:
 - Exempt individuals in hard-hit or hard-to-serve areas
 - Reward work effort
 - Address barriers to work
 - Apply to prior months
- Must track and correctly code



Regaining Eligibility

- Individuals who exhaust their 3 countable months can regain eligibility by becoming exempt or fulfilling the work requirement in any 30 day period.
- ABAWDs who regain eligibility by working get an additional 3 consecutive countable months



Who Are ABAWDs?



OH Association of Foodbank study of 5,000 ABAWDs found:

1 in 3 reported working in the last year.

1 in 5 are at-risk young adults, under 25, including youth aging out of foster care and exiting juvenile justice systems.



ABAWDs Were Not Always “Able Bodied”

1 in 3 reported having a physical or mental disability that limits their ability to perform daily activities.

1 in 4 were under a doctor’s care for conditions like depression, anxiety, PTSD, schizophrenia, diabetes, heart disease, and some report injuries.



ABAWDs Lack Basic Skills



30 percent had no high school diploma or GED. Many were marginally and functionally illiterate.



Significant Barriers to Employment



More than **1 in 3** reported having a felony conviction.

Close to **13%** were on probation or parole. About **15%** reported having a DUI or OVI violation, limiting their ability to secure employment.



What Else Do We Know?

- **Childless unemployed adults are very poor.**
Average income is 22 percent of poverty.
- **Only 37 percent** have an email address.
- **1 in 4** report having children not in their custody, and **1 in 5** owe child support.
- **Only 4 in 10** have a valid driver's license.
- Despite 1 in 3 working recently, **nearly 80 percent have never received unemployment compensation.**



Implementation

- Where do we implement?
- The 36 month clock
- Notices

- More in-depth implementation this afternoon



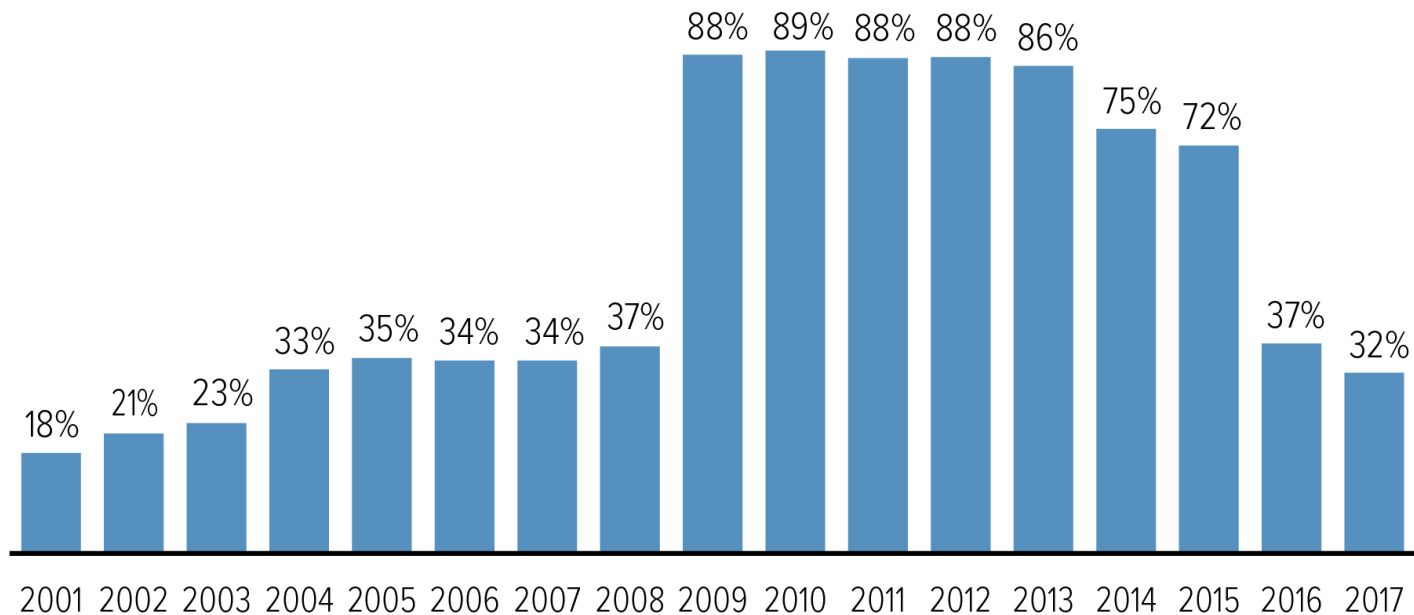
Waivers from the Time Limit for Areas with High Unemployment

A county, geographic area within a county, region, or an entire state can be approved to waive the ABAWD work requirement if it meets federally established criteria.



Historically, About 1/3 of the Country is Waived

Share of U.S. Waived from SNAP's 3-Month Time Limit



Note: Represents share of US population living in a waived area, i.e. county or city.



13 Counties Waived in FY 2002



20 Counties Waived in FY 2005



Note: Sacramento County only waived seven zip codes – 95639, 95655, 95690, 95742, 95814, 95824, and 95832.



Waiver Eligibility Criteria

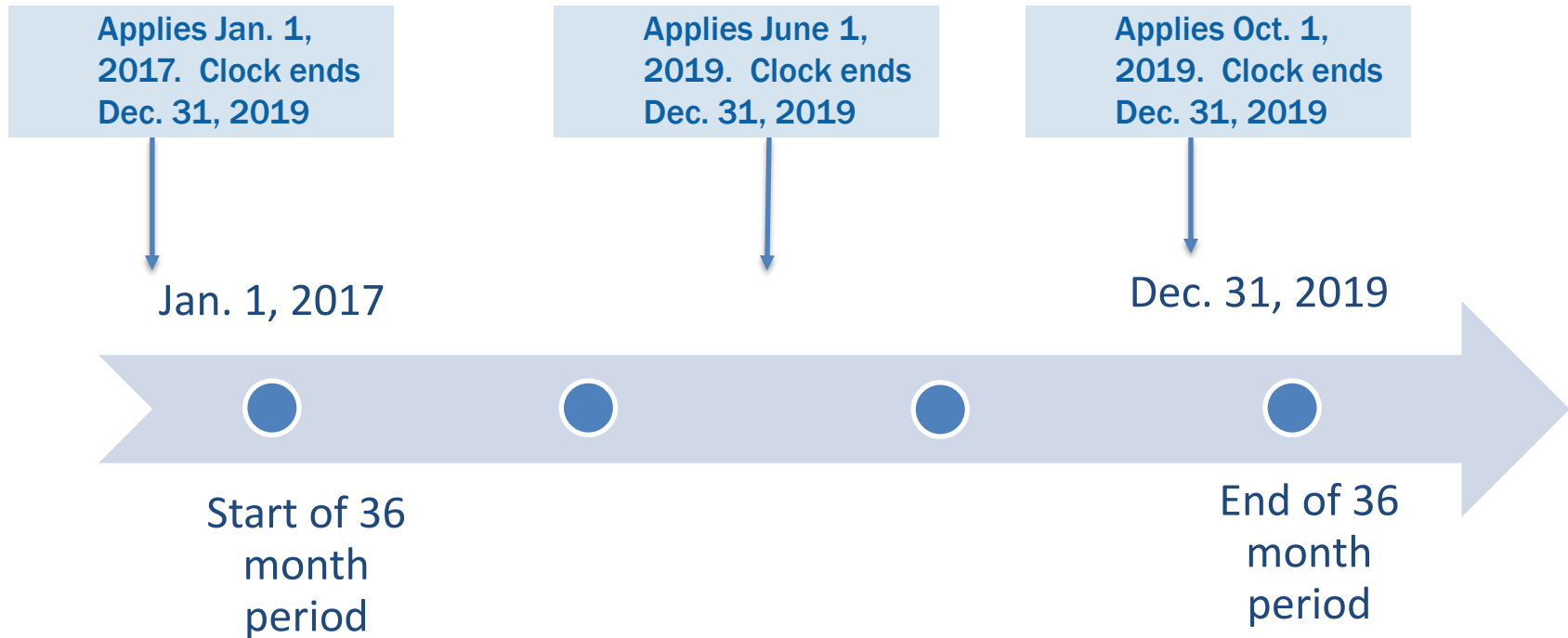
- CA has a state law requiring the state to request waivers for all eligible areas (SB68, 2005)
- Areas are eligible for a 12 month waiver from the time limit if they have high and sustained rates of unemployment.
- Examples of qualifying criteria:
 - 20% above national average for a recent 2-year period (LSA-like)
 - 10% average unemployment rate for recent 1-year or 3-month period



Pre-Implementation: 36 Month Period

Fixed Clock:

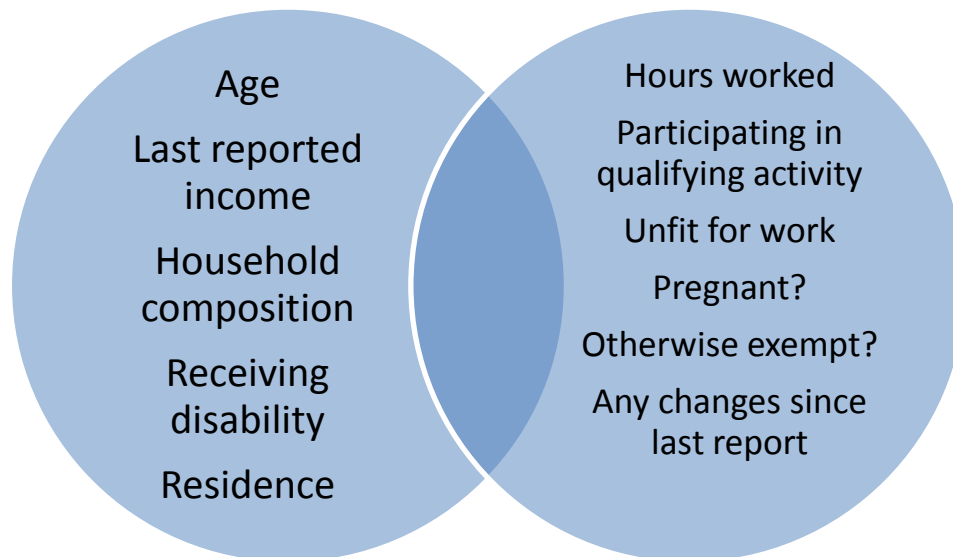
Every ABAWD in the State is on the same **36-month** timeline



Pre-Implementation: Identifying Current ABAWDs

Assume simplified reporting with 12 month cert periods

What's in the
casefile?



What's not in
the casefile?



Identifying ABAWDs

The work for 2017 is to identify participants who might be an individual subject to the time limit

- The information needed to exempt ABAWDs is typically not in the case file
- Sorting whether the rule applies requires an individual assessment
- Incorrectly applying the rule may result in eligible individuals losing benefits
- SNAP agencies need operational capacity prior to the time limit returning



Notifying ABAWDs

Challenges:

- Unclear informational notices
- Failure to list exemptions and compliance
- Confusing E&T and time limit
- General noticing requirements



Notices Must be Clear and Simple

Branch
Branch Street
Branch City Branch State Branch Zip



November 25, 2015

000000
PERSON NAME
ADDRESS
CITY STATE Residentialia

SNAP Notice to Able-bodied Adults Without Dependents

Starting Jan. 1, 2016, SNAP will change its requirements for what many able-bodied adults without dependents (ABAWDs) need to do to receive benefits. Our records show you are an able-bodied adult without dependents and you:

- Live in Multnomah or Washington County;
- Are 18 years of age or older, but not yet 50 years of age;
- Do not have a child under age 18 getting benefits with you.

The change:

Starting Jan. 1, 2016, many ABAWDs must be doing certain work activities in order to get food benefits. These ABAWDs can only get SNAP food benefits for three months in a three-year period if they do not do these work activities. The three-year period begins Jan. 1, 2016, ends Dec. 31, 2018, and starts over Jan. 1, 2019. **However, if you fall into Group A, you will not have to do these activities.**

What you need to do:

Find the group below that you belong to and take the action noted.

■ Group A: Are you in one or more of the following categories?

- A medical provider says you are not able to work.
- You are pregnant.
- You are working 30 hours a week or earning at least \$935.25 a month.
- If you are self-employed, you are earning at least \$935.25 a month without business costs. You must earn at least \$1,870.50 each month if you have business costs.
- You are getting unemployment insurance. *(Continued on back)*

Notices Must Identify Individuals Subject to Time Limit

This is to inform your household of a federal change to the Supplemental Nutrition Assistance Program (SNAP) effective **January 1, 2016**. This change limits the receipt of SNAP benefits to individuals who are determined to be an Able-Bodied Adult without Dependents (ABAWD) to three (3) months in a 36 month period, unless the individual is participating at least 80 hours each month in qualifying work activities. You are receiving this notice because you or someone in your household has been determined to be an ABAWD. If you are an ABAWD, you must meet ABAWD work requirements to maintain SNAP benefits beyond April, 2016.

“You are receiving this notice because you or someone in you household has been determined to be an ABAWD”



Advice from other States

- Start early and develop a detailed plan
- Create a centralized ABAWD unit to process all ABAWDs, or
 - Provide expertise to eligibility workers, or
 - Review cases
- Training must be comprehensive and continuous
- Engage stakeholders



More Implementation This Afternoon

- Goals:
 - Operationalizing the policy
 - Minimizing and correcting inadvertent mistakes
- Group 1: ABAWDs subject to the time limit
- Group 2: ABAWDs not subject to the time limit



Questions or Comments?

Ed Bolen

202-408-1080

bolen@cbpp.org

