



# Understanding SNAP Time Limits

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TENNESSEE  
JUSTICE  
CENTER



# TJC and the Nutrition Team

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**Signe Anderson**

*Senior Director of Nutrition Advocacy*

**Crys Riles**

*Anti-Hunger Advocate*

**Geraldine Hernandez-Marin**

*King Nutrition Fellow*

**Anna Grace Breedlove**

*WIC Referral & Data Specialist*



# TJC Anti-Hunger Advocacy

**Our mission: End hunger in Tennessee by protecting and strengthening the federal nutrition programs: SNAP, WIC, Child Nutrition Programs**

- Improve access and remove barriers to programs
- Advocate for solutions to systemic issues
- Educate and inform
- Provide policy expertise
- Direct client work



# Federal Nutrition Programs

**SNAP** Supplemental Nutrition Assistance Program

**WIC** Special Supplemental Nutrition Program for Women Infant and Children

**NSLP** National School Lunch Program

**SBP** School Breakfast Program

**SFSP** Summer Food Service Program

**CACFP** Child and Adult Care Food Program

## The Special Supplemental Nutrition Assistance Program for Women, Infants, and Children:



Reduces Food Insecurity



Improves Dietary Intake and Health



Protects Against Obesity



Boosts Learning and Development



Supports Economic Security



Lifts Families out of Poverty



Acts as Stimulus for Local Economies

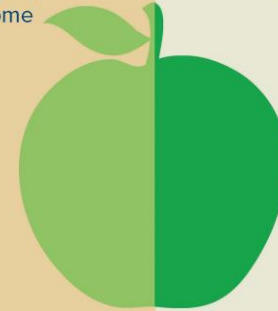
## SNAP STRENGTHS

### SNAP REDUCES HUNGER

and food insecurity by providing low-income people necessary food money.

### SNAP IMPROVES DIETARY INTAKE

and health, especially among children and with lasting effects.



### SNAP BOLSTERS LOCAL ECONOMIES

by increasing money spent for food at local retailers.

### SNAP LIFTS MILLIONS OF PEOPLE

out of poverty.



# Agenda

- **What Are Time Limits?**
- **Policy Harm to People**
- **Background and Context**
- **Legislation**
- **How to Take Action**



# What Are Time Limits?

# Origins

## Clinton-Era “Welfare Reform Act”

- The Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) of 1996
- Political trend - focused on self-sufficiency and personal responsibility
- Doesn't address the systemic issues to address poverty

# Federal Public Health Emergency (FPHE)

- SNAP 3-month time limit suspended during pandemic
- FPHE ended May 11, 2023
  - Time limit clock resumed July 1, 2023
  - October 1, 2023, some SNAP participants will lose SNAP





# 3 Month Time Limits

Policy limits certain SNAP participants to 3 months of benefits unless they meet work requirements

- limited to 3 months benefits in 3-year period
- Clock resets January 1, 2024
- If dropped, must prove 30 days of meeting requirement or be exempt to receive SNAP again



# Who is Subject?

***USDA term for time limited people: Able-Bodied Adults Without Dependents (ABAWDs)***

- Ages 18-52\*;
- Do not have a disability; AND
- Do not care for child or dependent.

\*As of 10/1/23 (Increased by the Debt Ceiling Agreement)

Able  
Bodied  
Adult  
Without  
Dependents

# Requirements

*Must meet **ONE** to keep SNAP benefits after 3 months:*

- 20 hours/week or 80 hours/month of:
  - Paid work
  - Work for trade (work in exchange for rent etc.);
  - Unpaid work/volunteering;
  - Workforce development programs (American Job Centers);
  - SNAP Employment & Training (E&T);
  - Adult Education (HiSET and GED classes); OR
- Meet Temporary Assistance for Needy Families (TANF) requirements (Families First)



# Time Limit Exemptions

- Younger than 18 or older than 52 years;
- Care for child under 18 years;
- Earn \$217.50 pre-tax per week, regardless of hours worked;
- Have disability or issue that makes it hard to work;
- Are pregnant;
- Applied for/currently receiving unemployment;
- Participate in drug or alcohol addiction program;
- Care for a disabled person;
- Other reasons that prohibit work; OR
- Are homeless;
- Are formerly in foster care and under 25;
- Are a veteran (regardless of discharge status);



New Modified Exemptions  
created in 2023

# College Students

**Must work 20 hours/week to keep SNAP benefits**

**Student exemptions from 3-month time limit:**

- Under 18/over 52 years old
- Have documented disability
- *Participate* in federal work study or training program for 20 hours/week
- Care for child under 6; *or* child 6-11 but unable to get childcare; *or* single parent enrolled full-time with child under 12 years
- Participate in TANF (Families First)
- Enrolled in E&T or similar program



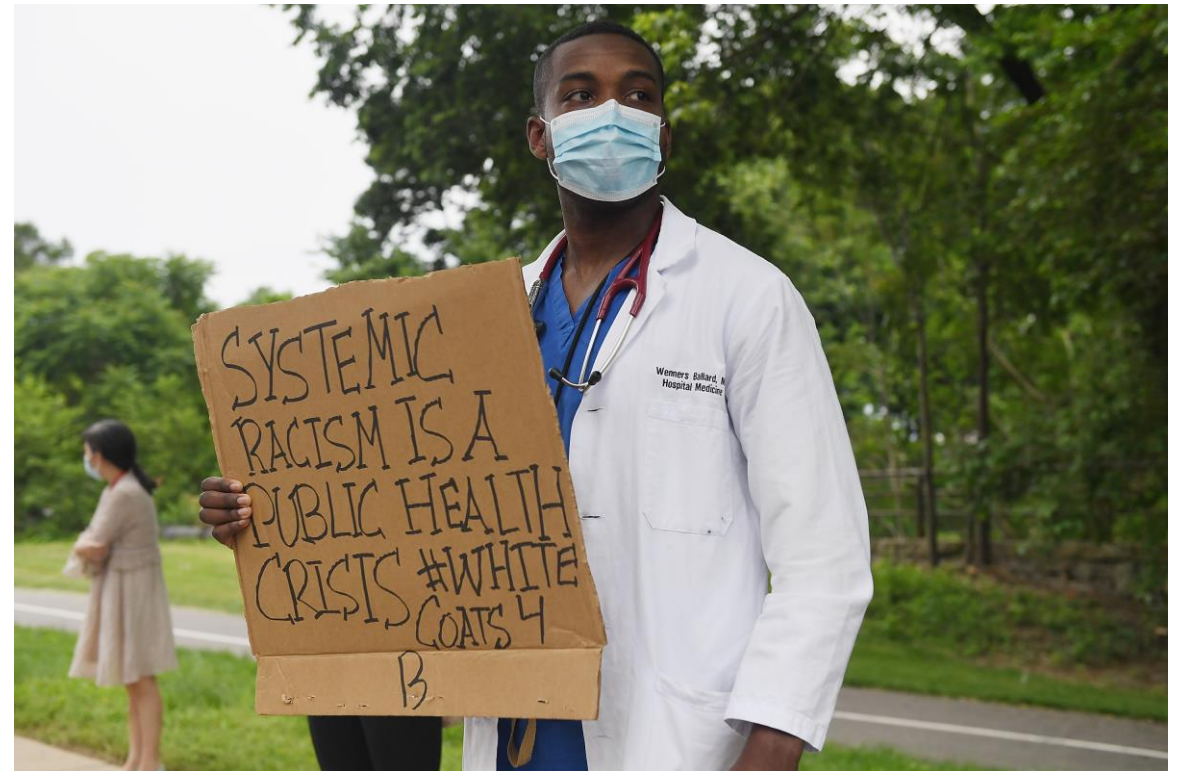


# Policy Harm to People

# Systemic Issues

Time limits do not address the underlying causes of poverty & food insecurity

- Racism & discrimination
- Lack of jobs/barriers to work
- Implicit and explicit bias
- Underemployment
- Wage stagnation
- Barriers to education



# Systemic Issues

Time Limits leave vulnerable populations the most at risk

- Housing insecure, especially the marginally homeless
- Mental or physical health issues
- Domestic abuse and other “invisible” situations
- People with disabilities not recognized by SSDI



# Time Limits Don't Work

## FNS study on effects of time limits:

- Time limits significantly reduce SNAP participation

HOWEVER

- “There was no evidence that ABAWD time limit increased employment or annual earnings.”

[Source](#)



# Whom Does Snap Reach?

In fiscal year 2022, it helped:

- **825,300** Tennessee residents, or **12%** of the state population (**1 in 9**)
- **41,206,900** participants in the United States, or **12%** of the total population (**1 in 8**)

<b>TENNESSEE</b>	more than <b>71%</b> of SNAP participants are in families with children	more than <b>35%</b> are in families with members who are older adults or are disabled	more than <b>37%</b> are in working families
<b>NATIONALLY</b>	more than <b>65%</b> of SNAP participants are in families with children	more than <b>36%</b> are in families with members who are older adults or are disabled	more than <b>41%</b> are in working families

Those who can work do work.



# Falling Through the Cracks

Time Limits don't capture all work, and some can be hard to prove:

- Gig workers
- contracted workers
- Seasonal workers
- Cash-paid work
- Tipped employees
- Project-based work (not time-based)
- Underemployment



# Falling Through the Cracks

Rural Tennesseans at risk of lost SNAP due to time limit policy:

- Family farming and other informal work
- Transportation Issues
- Access to internet
- Fewer opportunities for employment

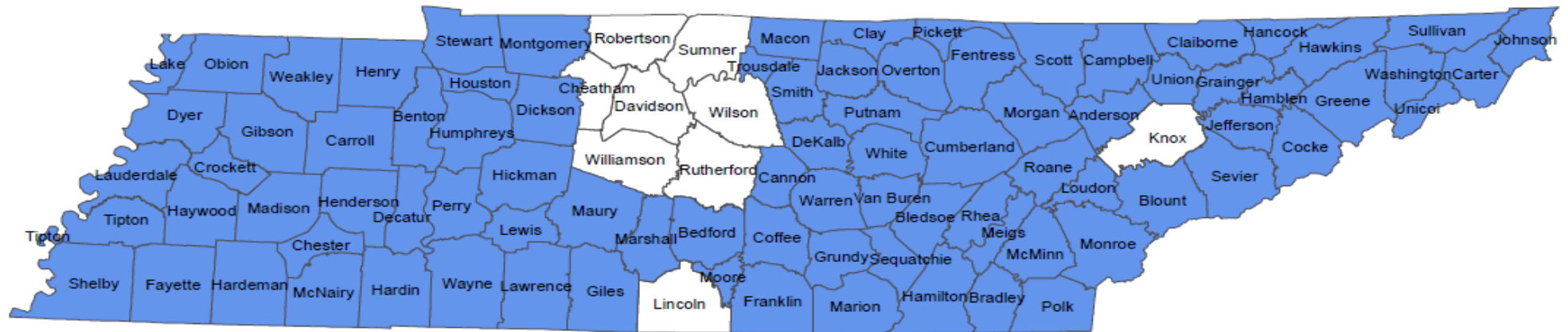


**One third of areas without enough jobs are rural areas** [Source](#)

# Background & Context

# County Waivers

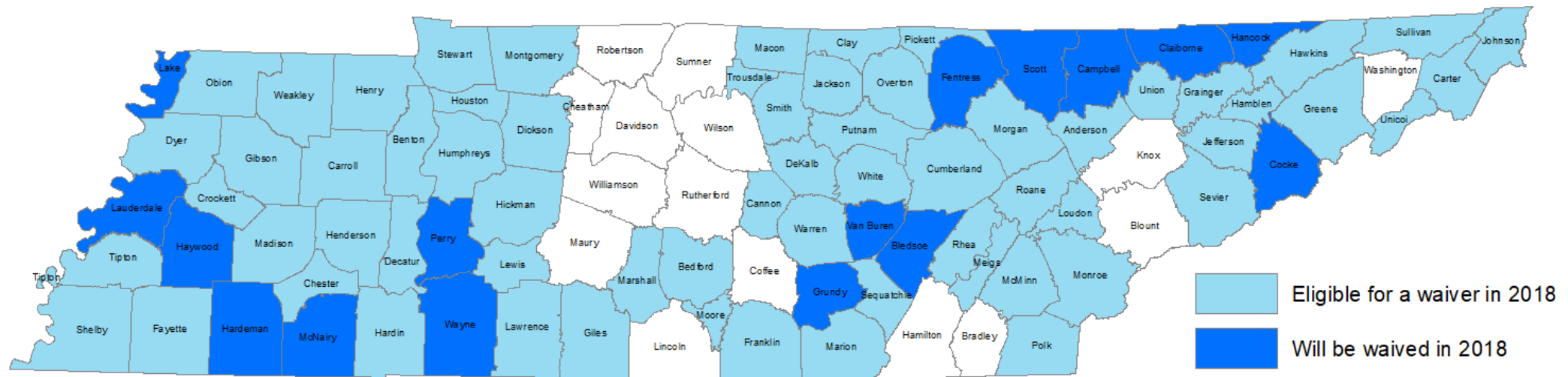
How TN has used waivers in the past: 2017



Waived (86)

# County Waivers

How TN has used waivers in the past: 2018



**In 2018, 80 Counties were eligible for waivers, only 16 were waived**



# County Waivers

How TN has used waivers in the past: 2019



- Bledsoe
- Hancock
- Lake
- Lauderdale
- Scott
- McNairy

# Discretionary Exemptions

State gets exemptions equal to 8% of overall caseloads

- TN has ~338k exemptions banked
- Exemptions allow people or populations to continue to receive SNAP as determined by the state SNAP agency. Example of other states use:
  - Recent prison release
  - Domestic violence
  - Substance abuse

TDHS use for: admin error and to cover  
newly exempt categories

LEGISLATION

# EATS Act (H.R. 3183)

## Enhanced Access to SNAP Act/Rep. Jimmy Gomez

- Would remove work reporting requirements for full-time college students
- Hunger should not be part of the college experience



# Improving Access to Nutrition Act (H.R. 1510)

- Rep. Barbara Lee
- Would abolish the 3-month time limit
- Would remove work requirement policy enacted by PRWORA
- [MORE INFO](#)



ADVOCACY/ACTION  
OPPORTUNITIES



# Legislative Action

## How to help:

- [Contact your legislators](#) and urge them to adopt these bills
- House Agriculture Committee members from TN overseeing the Farm Bill. Rep. [Scott DesJarlais \(TN-04\)](#) and [Rep. John Rose \(TN-06\)](#).
- Senators [Blackburn](#) and [Hagerty](#)



# Other Ways to Help

- **Sharing Information** with your clients and the community
  - Help people understand time limits so they don't get dropped unintentionally!
- **Be in the know – [Time Limit Flyer](#)**
- **Legislation Page [HERE](#)**
- **Contact TJC!**
  - Call or email us with questions



# Help Save WIC!

- WIC funding is under attack
- Over 133,000 women, infants, and children are at risk of losing benefits
- Use this link to send a letter to your representatives

[HELP SAVE WIC!](#)



# Information & Resources

- [TJC's Time Limit Flyer](#)
- [FNS Study on Time Limits](#)
- [Center on Budget Policy Priorities TN SNAP Facts Sheet](#)
- [Dept. of Labor Stats on Employment Opportunities](#)
- [Help Save WIC Legislative Action](#)
- [TJC's Anti-Hunger Page](#)

# QUESTIONS?

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**Signe Anderson (she/her)**

*Senior Director of Nutrition Advocacy*

[sanderson@tnjustice.org](mailto:sanderson@tnjustice.org)

**Crys Riles (they/them)**

*Anti-Hunger Advocate*

[criles@tnjustice.org](mailto:criles@tnjustice.org)

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[gmarin@tnjustice.org](mailto:gmarin@tnjustice.org)

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