The Return of SNAP’s Time Limit: It’s Tennessee’s Time

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Goal for Today

- Challenges for Tennessee workers
- Quick overview of the rule
- State challenges to implement
- Who is affected
- Why community groups will need to help
The Governor’s Announcement

• Voluntarily ended time limit waivers in some of the most impoverished counties in the nation

• Legislation that will increase Families First assistance and avoid the benefits cliff
TN Workers Getting Left Behind

Annual Wages and CPI Compared to 2001 Values

Source: US Bureau of Labor Statistics, TN Department of Labor and Workforce Development
Economy Has a Long Way to Go

Source: Tennessee Department of Labor and Workforce Development, June 2017
It Probably Won’t Be Getting Better

MAP 2: DISRUPTION INDEX FOR TENNESSEE COUNTIES
Able-Bodied Adults Without Dependents: The Rule

• Benefits are limited to 3 full months per 3 year period to an individual.

• Unless the individual:
  – works an average of 20 hours a week, or 80 hours a month
  – is in a qualifying job slot 80 hours a month or doing workfare, or
  – meets one of the limited exemptions, or
  – lives in a waived area.
In 2017, 86 Counties Do Not Have the Time Limit
In 2018, 80 Counties are Eligible for Waivers
Only 16 will be Waived

- Eligible for a waiver in 2018 (80)
- Will be waived in 2018 (16)
States Struggle to Implement

- Eligible individuals are terminated from SNAP.
- Fail to assess the ABAWD status of an individual early enough, or accurately.
- Not all work, training and exemptions are captured.
- Notices and forms are confusing and inaccurate.
- Few qualifying activities are available to individuals.
- Individuals lose benefits without knowing what happened.
Implementing the Time Limit

All 18 to 49 year olds, without children

... who live in un-waived areas

... who do not meet an exemption

... who aren’t working in qualified activity

Area waiver

Assess for exemption

Provide qualifying activity
Who is Exempt from the Rule?

- Under 18 or 50 years old or older
- Working at least 80 hours a month
- Residing in household with child under 18
- Pregnant
- Physically or mentally unfit for work
- Caring for an incapacitated person
- Receiving or applying for unemployment
- Regular participant in drug or alcohol treatment
- Eligible student
Physically or Mentally Unfit for Work

• Receives any kind of disability benefits;
• Is obviously unfit as determined by the state agency
  – This includes chronically homeless individuals;
• If not obvious, provides a statement from a:
  -- Physician or physician’s assistant, Psychologist, Nurse or nurse practitioner, Social worker, Representative of a physician’s office, or any other medical personnel the state determines appropriate
Challenges Identifying ABAWDs

Assume simplified reporting with 12 month cert periods

What’s in the casefile?
- Age
- Last reported income
- Household composition
- Receiving disability
- Residence

What’s not in the casefile?
- Hours worked
- Participating in qualifying activity
- Unfit for work
- Pregnant?
- Otherwise exempt?
- Any changes since last report
Good Cause for Not Meeting the Requirement

• Good cause for failing to work 80 hours a month: 7 C.F.R. 273.24(b)(2).

• In cases where an individual is fulfilling the ABAWD work requirement through SNAP E&T or workfare, good cause for failing to meet E&T or workfare requirement is good cause for failure to meet ABAWD requirement.
Providing Qualifying Activities: E&T

• Job search doesn’t count. Except when:
  – Less than half of total SNAP E&T hours,
  – Through WIOA or Trade Act program, or
  – Initial month of a workfare program for new applicants

• Combining work and training

• Workfare – at state option

• Self-initiated community service – at state option
Clear and Timely Informational Notices

- Identify if rule applies to individual.
- Explain how to comply or demonstrate exempt.
- List all exemptions.
- Explain consequences of failing to comply.
- Explain reporting requirements.
- Provide contact information.
Simple Language to Identify Individuals

Notice to Able-bodied Adults Without Dependents (ABAWD)

Able-bodied Adults Without Dependents (ABAWDs) need to do work activities to receive food benefits from the Supplemental Nutrition Assistance Program (SNAP). Our records show you will need to do work activities starting January 1, 2017. People who need to do work activities are able-bodied adults without dependents who:

- Live in Clackamas, 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 them.

“Our records show you will need to do work activities”
The Ohio Association of Food Banks assessed close to 5,000 ABAWDs. What did they learn?

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.
What did they learn?

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

**1 in 4** is under a doctor’s care for conditions like depression, anxiety, PTSD, schizophrenia, diabetes, heart disease, and some report injuries.
What did they learn?

30 percent have no high school diploma or GED. Many are marginally and functionally illiterate.
What did they learn?

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.
Community Groups Are Essential!

- Ensure the state didn’t miss an exemption
- Coordinate with the state on policy and practices
- Train application assisters
- Connect to food assistance and other resources
- Document, inform and engage!
Informing and Educating Clients

**URGENT**

**MANHATTAN RESIDENTS:** ARE YOU 18-49 YEARS OF AGE?

YOUR SNAP BENEFITS MAY HAVE TIME LIMITS!

Starting April 1st, many unemployed New Yorkers living on or below West 110th or East 96th Street will lose their SNAP Benefits.

**YOU MAY BE EXEMPT IF YOU ARE:**
- Living in Anne Arundel, Baltimore, Carroll, *Frederick, Howard, Montgomery, Prince George’s and Washington Counties*
- A disabled person
- A person caring for a child under the age of 6 or a disabled person
- A student who is not living with a parent or guardian

**ATTENTION!**

Rules for the Food Supplement Program (FSP/SNAP, formerly food stamps), which helps low-income Marylanders buy food, have changed effective January 1, 2016.

Under federal law, “able bodied adults without dependents” (ABAWDs) can only get FSP benefits for a maximum of 3 months in a 3 year period unless they are exempt or participating in an approved work activity.

People that may be affected are:
- Living in Anne Arundel, Baltimore, Carroll, *Frederick, Howard, Montgomery, Prince George’s and Washington Counties*
- A disabled person
- A person caring for a child under the age of 6 or a disabled person
- A student who is not living with a parent or guardian

**SNAP 3-Month Time Limit: What You Need to Know**

Beginning January 1, 2016, the federal SNAP time limit for able-bodied adults without dependents (ABAWDs) went back into effect in Pennsylvania. The time limit does not apply to many counties in Pennsylvania.

As of January 1, 2016, an ABAWD can only get 3 full months of SNAP in a 36-month period—unless s/he lives in a waivered part of PA, meets an exception, or is meeting certain hours in qualifying work activities. To see a list of waived areas in Pennsylvania, visit [https://eligh.org/dsbam](https://eligh.org/dsbam).

If you are getting letters from the Department of Human Services (DHS) about ABAWD requirements, check below to see if you can be found exempt or, if not, how to meet the work requirements. Follow the Action item to make sure you can keep your SNAP benefits.

**Who is exempt?**

- Living in Anne Arundel, Baltimore, Carroll, *Frederick, Howard, Montgomery, Prince George’s and Washington Counties*
- A disabled person
- A person caring for a child under the age of 6 or a disabled person
- A student who is not living with a parent or guardian
Special Outreach to Medical Providers

Provider Network Fax Blast
Monday, December 21, 2015

Provider Notification

You Can Help Low-Income Single Adults
Keep their Food Benefits

SNAP benefits (formerly food stamps) allow low-income people to buy the food they need to stay healthy. Many patients and CeltiCare Health members (single adults ages 18-50) are considered Able-bodied Adults Without Dependents (ABAWDs). They are at risk of losing their SNAP benefits (food stamps) because of a reinstated federal rule that goes into effect on January 1, 2016. The rule limits SNAP benefits to 3 months in a 3 year period - unless your patient meets an exemption or certain work rules.

With just a few minutes of your time, we can easily help. Many ABAWDs may be homeless, lacking regular health care, disabled or unable to work. If you are working with a patient who fits this description, you can easily help him or her in the following ways:

- If the patient is homeless, you can help the patient call the Department of Transitional Assistance...
Your Work Can Shape Coverage

Food pantry demand grows
Between 2007 and 2015, the average number of food boxes Preble Street delivers at its pantry jumped 50 percent, from an average of 111 a week to 166.

Thousands in metro area no longer eligible for food stamps
by: Sophia Choi Updated: Jun 7, 2016 - 6:48 PM

VIDEO: LESS MONEY FOR FOOD AND MORE NEED FOR GROCERIES
by: Jay Tully
Submitted: 04/05/2016 - 9:31pm

Thanks for the feedback! We'd love to hear from you to improve your experience in the future.

Cobb County, Ga. - Thousands of Georgians are now going without food stamps because of new...
Questions or Comments?

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