
Updated May 4, 2021

Permanently End the SNAP Cut-Off to Support a More Equitable Recovery

By Ed Bolen, Joseph Llobrera, and Brynne Keith-Jennings

The Supplemental Nutrition Assistance Program (SNAP) provides benefits broadly to low-income households that meet the program’s eligibility requirements, but its coverage of non-elderly adults not living with children at home is heavily restricted. With some exceptions, SNAP rules limit benefits for adults ages 18-49 who don’t live with minor children and aren’t disabled to just three months in any 36-month period when they are not employed or participating in a work or training program for at least 20 hours a week. Essentially, this is a time limit — which disproportionately affects people of color — that takes SNAP away when people aren’t working, withholding food as a punishment for not having a stable job. Policymakers should eliminate this harsh policy as part of a forthcoming recovery package that promotes a more equitable and just economic recovery.

The nation’s basic supports for low-income, non-elderly adults not living with children, particularly for those who do not meet a rigorous disability standard, are weak, fragmented, and often highly restrictive, leaving many of these individuals without help they need to afford the basics.¹ While most who can work do so when they are able to find work, their jobs do not provide stability, and many have periods of joblessness that leave them struggling to meet basic needs. SNAP is one of the few forms of support available to them, but the time limit on SNAP for those out of work means that many adults don’t get help when they need it most.

The Families First Coronavirus Response Act, enacted in March 2020, temporarily suspended SNAP’s three-month time limit nationwide through the end of the public health emergency, in recognition of the impact the pandemic is having on the labor market and unemployed workers’ need for food assistance. Even in good times, however, many adults, especially those without a college education, face serious labor market challenges. As the economy recovers from the effects of the pandemic, people who worked in low-paid jobs before the crisis and who have lost their job will likely experience a far slower jobs recovery, making it all the more important that individuals are not cut off from SNAP benefits as they are trying to find work.

But even well into an economic expansion, many adults will face periods when they can’t work or can’t find a job. Arbitrarily taking food assistance away from these individuals can mean that they are

¹ Joseph Llobrera *et al.*, “A Frayed and Fragmented System of Supports for Low-Income Adults Without Minor Children,” CBPP, January 28, 2021, <https://www.cbpp.org/research/poverty-and-inequality/a-frayed-and-fragmented-system-of-supports-for-low-income-adults>.

unable to afford food, with the attendant health implications that, in addition to causing suffering, make it harder for them to find work.

Taking basic food assistance away from people in desperate circumstances should be unacceptable in a wealthy nation.

Most Adults Potentially Subject to the Time Limit Have Little Access to Key Supports; They Turn to SNAP When Unemployed

Our system of economic and health supports — including SNAP, Medicaid, and refundable tax credits such as the Child Tax Credit — is geared largely toward helping children and their parents, people with disabilities, and the elderly. Low-income adults not living with minor children, who generally have limited education, skills, and employment prospects even in normal economic times, aren't well served by this system.

SNAP's three-month time limit on those out of work takes away critical nutrition benefits from many low-income non-elderly adults without children in their home. Those in this group who don't have at least half-time jobs generally have their SNAP benefits cut off after three months, irrespective of whether they are searching for a job or willing to participate in a qualifying work or job training program. States are not obligated to offer the affected individuals a work or training program slot, and most do not. And, while in theory exemptions exist for those with health issues that prevent them from working, experience shows that many whose benefits are taken away have health and other circumstances that should have qualified them for an exemption.

When unemployment is high, the rule allows states to request temporary waivers of the time limit, in recognition that jobs are harder to find in a weak economy. But not all states opt for the area waivers and many areas do not qualify, despite insufficient job opportunities for SNAP participants.

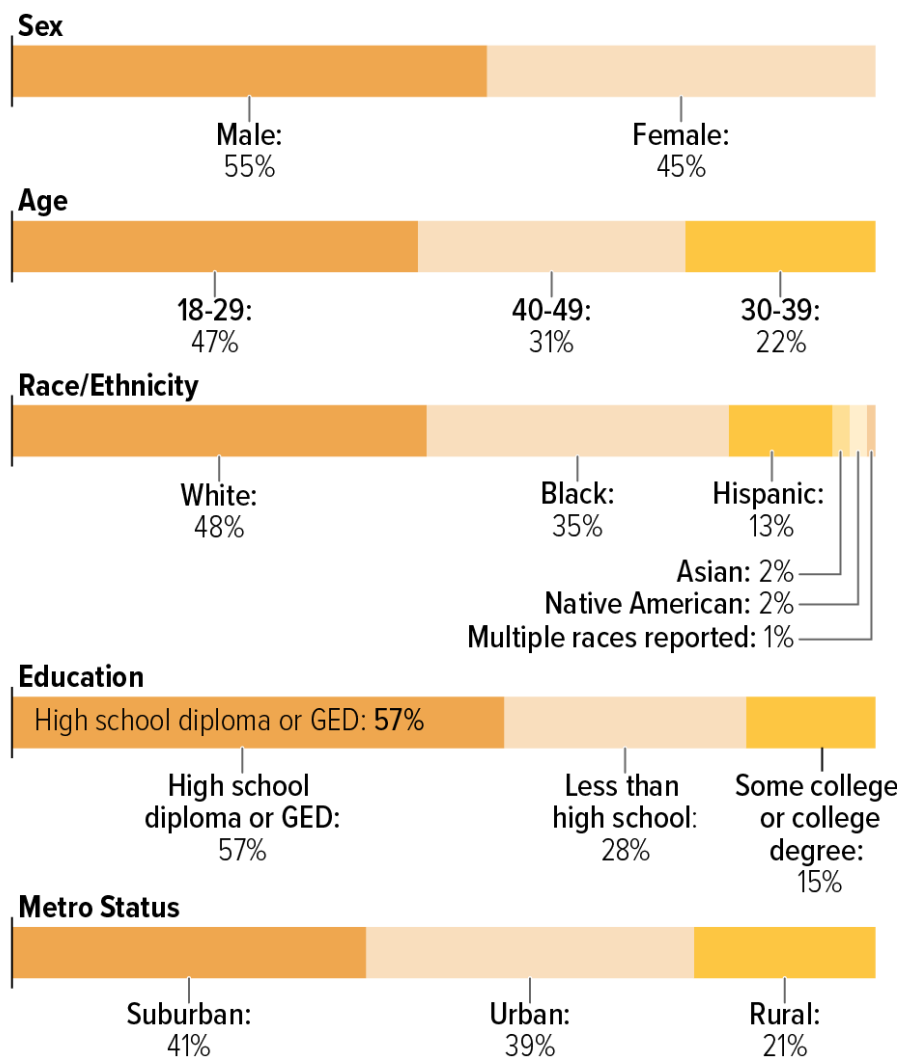
Time Limit Applies to Diverse Group of Low-Income Adults

The group of adults who are at risk of having their SNAP taken away if they aren't working is poor and diverse.² (See Figure 1.) Among those who reported their education, nearly a quarter (24 percent) have less than a high school education, and 60 percent have only a high school diploma or GED. Among adults potentially subject to the time limit who report their race or ethnicity, about half are white, over one-third are Black, and about 1 in 7 are Latino.

² Not all non-elderly adults without children in their home are actually subject to the time limit, as some may meet certain other exceptions from the time limit, live in areas with waivers from the time limit, work at least 20 hours a week, or be exempt from general SNAP work requirements. For more information, see www.fns.usda.gov/snap/able-bodied-adults-without-dependents-abawds.

FIGURE 1

Adults Subject to SNAP Time Limit Are Poor and Diverse



Note: For a more representative sample of adults potentially subject to the time limit, demographic characteristics are based on CBPP analysis of the 2014 SNAP household characteristics data and March 2015 Current Population Survey. In 2014, 32 states and the District of Columbia still had statewide waivers from the time limit based on high unemployment rates after the 2009 recession, and had not cut off many non-elderly adults not living with minor children.

Source: CBPP analysis of 2014 SNAP household characteristics data and March 2015 Current Population Survey (CPS) (for metro status only).

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In general, adults whose SNAP could be taken away if they aren't working are extremely poor. Like many others, these adults often turn to SNAP when they're no longer able to make ends meet — for example, when they lose a job, have their hours cut, or can only find low-paid or inconsistent employment. And these adults often have access to few other government benefits. Their household

income during the months they participated in SNAP averaged \$4,500 in 2018 on an annualized basis (about 37 percent of the poverty level for a single-person household in 2018). Monthly SNAP benefits for this group — in the months in which they could receive the benefits — average only \$185.

The number of households that struggle to put enough food on the table has risen dramatically due to the economic effects of the pandemic. In late March 2021, some 18 million adults (or 8.8 percent) reported that their household didn't get enough to eat sometimes or often in the last seven days. Even after the public health emergency ends, access to SNAP benefits will be critical in reducing the risk of food insecurity and hunger for all households, including those with non-elderly adults not living with minor children, during what could be a long economic recovery.

Time Limit Ignores Labor Market Realities

The types of jobs most readily available to low-income workers, including the adults subject to the time limit, often have characteristics that make it difficult for workers to achieve economic security and to remain stably employed. These jobs often pay low wages, do not offer basic benefits such as paid sick leave or health insurance, and have scheduling practices that may change frequently and offer workers little say in their work hours.³ Workers can lose their jobs when they are ill or need to care for an ill family member and then face challenges finding a new job even when they are ready to return to work. Other conditions, such as high housing and other costs, a mismatch between available jobs and where workers live, and lack of affordable transportation, also add to these challenges for many low-wage workers.

Not only does low job quality make it hard for workers to stay employed long term and make ends meet, it also makes it hard to reliably work for the 20 hours per week necessary to remain eligible for SNAP. For example, a worker with little control over their schedule who is given too few hours, or who loses a job due to missing a shift because of transportation barriers, may be at risk of being cut off SNAP under this time limit.⁴

Adding to the challenges posed by the labor market, many low-income adults at risk of having their SNAP taken away if they are out of work also face multiple challenges to economic stability, including homelessness, physical and mental health limitations, language barriers, unstable employment histories, and criminal records. For example, interviews with individuals in Ohio who were subject to the three-month cut-off revealed that many face significant unaddressed barriers to employment. One-third had a medical or physical limitation including post-traumatic stress disorder, a mental or learning disability, or depression. Sixteen percent needed supportive services like

³ Brynne Keith-Jennings and Raheem Chaudhry, "Most Working-Age SNAP Participants Work, But Often in Unstable Jobs," CBPP, March 15, 2018, <https://www.cbpp.org/research/food-assistance/most-working-age-snap-participants-work-but-often-in-unstable-jobs>.

⁴ For more on how scheduling practices in low-wage jobs make it difficult for SNAP and other program participants to meet program requirements for specific hours of work, see Michael Karpman, Heather Hahn, and Anuj Gangopadhyaya, "Precarious Work Schedules Could Jeopardize Access to Safety Net Programs Targeted by Work Requirements," Urban Institute, June 11, 2019, <https://www.urban.org/research/publication/precarius-work-schedules-could-jeopardize-access-safety-net-programs-targeted-work-requirements>.

language interpretation or transportation to find work. In addition, 13 percent reported being caregivers for a parent, relative, or friend. More than one-third had felony convictions.⁵

Physical and mental health issues can lead to job loss, complicate reentry into the workforce, and limit job opportunities. Moreover, limited education, lack of training, and a sporadic work history often make it harder for workers to find higher-quality jobs that are likelier to lift workers out of poverty.

Because many low-income workers experience periods of joblessness and turn to SNAP after losing a job, only about a quarter to half of adults subject to the time limit are working in a typical month that they receive SNAP.⁶ Many of these individuals do work when they can, however: about 74 percent of these adults worked at some point in the year before or year after receiving SNAP, according to 2014 data that were consistent with earlier research.⁷ (See Figure 2.)

⁵ Ohio Association of Food Banks, “Franklin County Comprehensive Report on Able-Bodies Adults Without Dependents, 2014-2015,” October 14, 2015, http://admin.ohiofoodbanks.org/uploads/news/ABAWD_Report_2014-2015-v3.pdf.

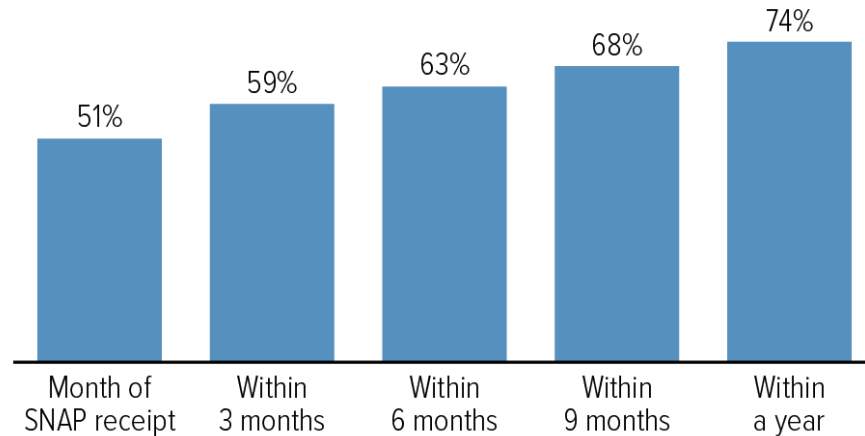
⁶ This range reflects a difference in data sources. CBPP analyses of USDA’s administrative data show that 27 percent of adults participating in SNAP who are potentially subject to the time limit worked in a typical month of 2018. In addition, CBPP analyses of the Census Bureau’s 2014 Panel of the Survey of Income and Program Participation (SIPP) show that 51 percent of these adults worked in 2015 in the month that they received SNAP. There are reasons for the differences in the results between the USDA data and the Census SIPP data. SIPP is a household survey, which means that respondents must have a fixed residence, but SNAP reaches many homeless households and other more transient households, who may be less likely to be employed while receiving SNAP. These people may show up in the USDA data but not the SIPP data. At the same time, work that households are not required to report for SNAP purposes may be captured by the SIPP data, but not by USDA’s. (Some work may not be required to be reported for SNAP either because it is irregular or isn’t expected to continue or because, under SNAP’s “simplified reporting” rules, changes in circumstances need only be reported at six-month intervals unless they raise household income above 130 percent of the poverty level.)

⁷ Research conducted on the impact of the time limit following its enactment in 1996 found that three-quarters of all low-income adults who weren’t living with minor children and didn’t have a severe disability (not just those on SNAP) worked in 1997, while 86 percent were in the labor force (that is, either working or actively looking for work). See Stephen Bell and Jerome Gallagher, “Prime-Age Adults without Children or Disabilities: The ‘Least Deserving of the Poor’—or Are They?” Assessing the New Federalism Policy, Urban Institute, February 2001, <https://www.urban.org/sites/default/files/publication/61286/310269-Prime-Age-Adults-without-Children-or-Disabilities.PDF>. Although USDA’s administrative data may not be sufficiently reliable to draw firm conclusions, they suggest that, in a typical month in 2018, half (50 percent) of all adults subject to the time limit who were not working were looking for work.

FIGURE 2

74 Percent of Adults Potentially Subject to the Time Limit Work in Year Before or After Receiving SNAP

Work participation during and after typical month of SNAP receipt



Source: CBPP Analysis of 2014 Survey of Income and Program Participation (SIPP) panel data

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While even in good times the low-wage job market makes it difficult for workers to achieve economic security, the disproportionate impact of the pandemic’s economic effects on low-paid workers makes it likely that they will face a slower recovery. Despite some recovery, job losses have been steep, and the number of workers out of work for at least six months has been rising.⁸ These job losses have not been evenly shared: low-paid industries accounted for more than half of the jobs lost from February 2020 to March 2021.⁹

Similarly, the recovery will likely be slower for low-paid workers and those of color. Jobs have returned far more quickly for people with a college degree than for people without a college degree, exacerbating racial disparities in unemployment.¹⁰ Racial disparities in labor market outcomes are likely to persist well into the recovery, based on past recoveries including the period after the Great Recession. Historically, Black workers have experienced high unemployment rates in the best of

⁸ Chad Stone and Matt Saenz, “Labor Market Weaker Than Headline Numbers Suggest,” CBPP, March 1, 2021, <https://www.cbpp.org/research/economy/labor-market-weaker-than-headline-numbers-suggest>. (These figures were also updated in a thread by Chad Stone, at <https://twitter.com/ChadCBPP/status/1378004433875955721>.)

⁹ CBPP, “Tracking the COVID-19 Recession’s Effects on Food, Housing, and Employment Hardships,” updated April 8, 2021, <https://www.cbpp.org/research/poverty-and-inequality/tracking-the-covid-19-recessions-effects-on-food-housing-and>.

¹⁰ Chad Stone, “Rescue Act Extends Unemployment Benefit Programs That Help Millions of Unemployed Workers and Their Families,” CBPP, March 12, 2021, <https://www.cbpp.org/blog/rescue-act-extends-unemployment-benefit-programs-that-help-millions-of-unemployed-workers-and>.

times and devastatingly high rates in recessions and slow recoveries. Latino workers have a similar pattern.¹¹

The pandemic has weakened the labor market for low-paid workers, which even in good times features high levels of instability. The recovery and job opportunities may lag for those likely to be rehired into low-paid jobs. As a result, the return of a policy that takes SNAP away from people out of work could mean that many adults will lose the food assistance they need.

Work Requirements Don't Significantly Increase Employment and Have Significant Negative Consequences

Research suggests that taking SNAP away from people because they cannot find stable employment won't create more job opportunities or better equip workers to maintain work, while losing SNAP can result in significant hardship. Work requirements in other programs have generated little or no long-term increase in earnings and employment and have caused many households — often those with the greatest disadvantages — to lose assistance, leaving them in deep poverty, research shows.¹² A multi-state study of the impact of the initial implementation of the three-month SNAP cut-off found that most individuals remained poor, found little sustainable work, and struggled to afford adequate food.¹³ More recent studies have also failed to find significant increases in employment and that the time limit has led to loss of benefits.¹⁴

The time limit also disproportionately affects people of color. Black and Latino adults were likelier to lose benefits than white adults due to SNAP's time limit, research has found.¹⁵ And, research shows similar effects in other programs: nearly every study comparing the race and ethnicity of sanctioned and non-sanctioned recipients of Temporary Assistance for Needy Families who are subject to work requirements finds that Black people are significantly more likely to be

¹¹ Chad Stone, "Robust Unemployment Insurance, Other Relief Needed to Mitigate Racial and Ethnic Unemployment Disparities," CBPP, August 5, 2020, <https://www.cbpp.org/research/economy/robust-unemployment-insurance-other-relief-needed-to-mitigate-racial-and-ethnic>.

¹² LaDonna Pavetti, "Work Requirements Don't Cut Poverty, Evidence Shows," CBPP, updated June 7, 2016, <https://www.cbpp.org/research/poverty-and-inequality/work-requirements-dont-cut-poverty-evidence-shows>.

¹³ See Elizabeth Dagata, "Assessing the Self-Sufficiency of Food Stamp Leavers," Economic Research Service, USDA, September 2002, <https://www.ers.usda.gov/publications/pub-details/?pubid=46645>, for a summary of in-depth studies in Arizona, Illinois, Iowa, and South Carolina. See also individual reports for Iowa.

¹⁴ Wenhui Feng, "The Effects of Changing SNAP Work Requirement on the Health and Employment Outcomes of Able-Bodied Adults without Dependents," *Journal of the American College of Nutrition*, 2021, <https://doi.org/10.1080/07315724.2021.1879692>; Colin Gray *et al.*, "Employed in a SNAP? The Impact of Work Requirements on Program Participation and Labor Supply," August 2020, available at SSRN, <http://dx.doi.org/10.2139/ssrn.3676722>; Jeehoon Han, "The Impact of SNAP Work Requirements on Labor Supply," August 27, 2020, available at SSRN, https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3296402; Leighton Ku *et al.*, "The Effects of SNAP Work Requirements in Reducing Participation and Benefits from 2013 to 2017," *American Journal of Public Health*, August 15, 2019; Brian Stacy, Erik Scherpf, and Young Jo, "The Impact of SNAP Work Requirements," working paper, <https://www.aeaweb.org/conference/2019/preliminary/paper/Z8ZhzBZt>.

¹⁵ Erin Brantley, Drishti Pillai, and Leighton Ku, "Association of Work Requirements with Supplemental Nutrition Assistance Program Participation by Race/Ethnicity and Disability Status, 2013-2017," *JAMA Network Open*, June 26, 2020, <https://jamanetwork.com/journals/jamanetworkopen/fullarticle/2767673>.

sanctioned than their white counterparts, an outcome that likely occurs in the implementation of the SNAP time limit as well.¹⁶

Losing SNAP can have serious implications for the well-being of adults without children in the home and can make it harder for them to find work. Research from the early implementation of the time limit, for example, showed that people whose benefits were taken away because they were out of work had high rates of food insecurity, many lacked health insurance, and many faced housing instability.¹⁷ Other studies have found that individuals whose SNAP was taken away due to the time limit were likelier to experience sick days¹⁸ and that they described having to make tradeoffs between food and other necessities; this can affect their family members and communities, as well.¹⁹ Experiencing food insecurity, poor health, or housing instability can make it more difficult to find and sustain work.

Conversely, SNAP participation can improve some health outcomes, research shows. After adjusting for differences in demographic, socioeconomic, and other characteristics, adults who participate in SNAP are more likely to assess their own health as excellent or very good.²⁰ Adults who receive SNAP have fewer sick days, make fewer visits to a doctor, are less likely to forgo needed care because they cannot afford it, and are less likely to exhibit psychological distress.

In an effort to find more effective ways to connect SNAP participants to better-quality jobs, some states have developed approaches that focus on helping them increase their earnings through training in high-demand sectors. These approaches are expected to have better outcomes than work requirements and do not risk taking away food benefits to unemployed individuals who need them to eat.

SNAP Time Limit Is Complex to Administer, Takes Away Benefits From People Who Should Be Exempted

The time limit taking SNAP away from people who are out of work is a complicated policy to administer, leading to errors in who should lose benefits and higher administrative costs.

State administrators have expressed strong concern with the complexity of the time-limit provision since its passage in 1996. The rule requires them to track individuals with a level of specificity that is inconsistent with how they otherwise operate SNAP and other low-income

¹⁶ LaDonna Pavetti, “TANF Studies Show Work Requirement Proposals for Other Programs Would Harm Millions, Do Little to Increase Work,” Center on Budget and Policy Priorities, November 13, 2018, <https://www.cbpp.org/research/family-income-support/tanf-studies-show-work-requirement-proposals-for-other-programs>.

¹⁷ Dagata, *op cit*.

¹⁸ Feng, *op. cit*.

¹⁹ Heather Hahn *et al.*, “SNAP Work Requirements in Arkansas for Adults without Dependents or Disabilities,” Urban Institute, 2019, https://www.urban.org/sites/default/files/publication/101112/snap_work_requirements_in_arkansas_for_adults_with_out_dependents_or_disabilities_6.pdf.

²⁰ Christian A. Gregory and Partha Deb, “Does SNAP Improve Your Health?” *Food Policy*, Vol. 50, pp. 11-19, 2015, <http://www.sciencedirect.com/science/article/pii/S0306919214001419>.

assistance programs. States find the rule to be error-prone and believe that it can increase their payment error rate. And some states find the time limit diverts administrative resources from more effective operational and job training initiatives.

Moreover, experience shows that states struggle to make nuanced determinations about whether someone has a “good reason” for not having a job, and many whose SNAP benefits are taken away actually meet exemption criteria that have not been applied or have not been applied properly. In Medicaid, an analysis concluded that a substantial majority of those whose coverage would be taken away for not meeting work requirements if such requirements were in place in Medicaid would be people who were working or who should qualify for exemptions, but who would fail to overcome the new documentation requirements and other hurdles to maintain their coverage that work requirements would have imposed.²¹

SNAP Time Limit Should Be Permanently Eliminated

SNAP was created to protect the well-being and food security of low-income individuals and families by helping them afford a more nutritious diet. By taking away food assistance benefits from people who are out of work, the time limit increases the risk of food insecurity and hunger for adults not living with minor children. The best course would be for Congress, as part of a comprehensive recovery package, to permanently eliminate the three-month time limit and restore access to food assistance benefits for these individuals on the same basis as applies to other non-elderly or disabled participants.

²¹ Rachel Garfield, Robin Rudowitz, and MaryBeth Musumeci, “Implications of a Medicaid Work Requirement: National Estimates of Potential Coverage Losses,” Kaiser Family Foundation, June 27, 2018, <https://www.kff.org/medicaid/issue-brief/implications-of-a-medicaid-work-requirement-national-estimates-of-potential-coverage-losses/>.