Technical Appendix for Who Stands to Lose If the Final SNAP Work Requirements Rule Takes Effect?

This interactive allows users to find out how many people and SNAP households lived in places—the United States and each state and county—that would have lost the protection of a SNAP work requirement waiver during the Great Recession (in 2009) and during an expansion (in 2018) had the Trump Administration's final rule been in place.



U.S. Population

County-level population estimates are based on the U.S. Census Bureau's <u>Population Estimate Program</u>. For 2009 and 2018 county population estimates, we use the Census Bureau's estimate for population on July 1 of that year. County-level waiver eligibility criteria are for 2009 and 2018.

SNAP Households

Estimates of SNAP households come from pooled 5-year American Community Survey data for 2009 (2007–11 data) and 2018 (2014–18 data). The focal year for county-level waiver eligibility data are for 2009 and 2018, regardless of the years over which the household data are pooled; i.e. waiver eligibility in centered for 2009 and in the last year for 2018.

A household is considered a SNAP household if it reported receipt of SNAP or food stamp benefits in a given year. There is some evidence of underreporting of SNAP benefits receipt in household surveys, thus these estimates of the number of SNAP households may be an underestimate (Meyer, Mok, and Sullivan 2015). SNAP households are inclusive of ABAWD households, but are not exclusively ABAWD households.

County-Level Waiver Eligibility

The percent decrease in work requirement waiver eligibility is based on the difference in a county's waiver status under the standing rules (the rules that were in place before the USDA began their rulemaking process) and the final rule that was released on December 5, 2019 and set to go into effect on April 1, 2020. (In mid-March 2020 the U.S. District Court for Washington, DC, issued a preliminary injunction against USDA, halting the implementation of its final work requirement rule. Moreover, The Families First Coronavirus Response Act suspended work requirements for the duration of the national health emergency.)

SUMMARY OF RULES

- **Standing Rule:** We model the standing rules as the existing set of eligibility standards as well as policy changes made by USDA and Congress over the course of the Great Recession to increase waiver eligibility for both counties and labor market areas (LMAs) from 2007 to 2018:
 - 1) a 3-month and a 12-month average unemployment rate of 10 percent,
 - 2) a 24-month average unemployment rate 20 percent above the national average for the same period,
 - 3) qualifying for unemployment insurance extended benefits (EB); as well as temporary criteria added during the Great Recession,
 - 4) qualifying for emergency unemployment compensation (EUC), and
 - 5) qualifying under the American Recovery and Reinvestment Act of 2009 (ARRA).
- **Final Rule**: We model the final rule as the of counties in eligible LMAs that would have qualified for a work requirement waiver from 2007 to 2018 had the final rule been in place with the following criteria:
 - 1) a 12-month average unemployment rate of 10 percent, and
 - 2) a 24-month average unemployment rate 20 percent above the national average for the same period with a 6 percent unemployment rate floor.

An LMA is a geographic unit that describes an economically integrated area in which people "can reside and find employment within a reasonable distance or can readily change jobs without changing their place of residence" (Bureau of Labor Statistics 2020).

DATA SOURCES

Data on local economic conditions come from the Local Area Unemployment Statistics, Bureau of Labor Statistics (2000–2018). Data on Extended Benefits and Emergency Unemployment Compensation come from Department of Labor trigger notices. Data on national economic conditions come from the Bureau of Labor Statistics Employment Situation data.

GEOGRAPHIC AGGREGATION

For the final rule, New England counties which are part of more than one Labor Market Area (LMA) are considered eligible if they are part of at least one eligible LMA. Monthly county-level eligibility triggers for a calendar year are annualized on a fiscal year basis. We do not ascribe eligibility to other geographic units—such as regions, cities, or other sub-state groupings of contiguous areas—than counties or LMAs.

Zip codes

The interactive takes a user's zip code as input. For zip codes that cross county lines, we assign a zip code to the county that contains the majority of the addresses. This assignment does not affect our calculations, but affects the county that is displayed when entering a zip code into the interactive search bar.

There are three zip codes where addresses are split perfectly evenly between two counties (51603, 59260, 98068). Addresses are split into three types: residential, business, and other. For zip code 59260, we assigned it to the county that contained the majority of residential addresses. Zip codes 51603 and 98068 had no residential addresses, and the addresses that they did contain were either split evenly between business addresses (51603) or other addresses (98068). In these cases with no residential addresses, we assigned the zip codes to the first county listed.

ANNUAL AGGREGATION:

If a county was eligible for a waiver for any month within a fiscal year, then it is eligible for the entire fiscal year. Waiver eligibility is for 2009 and 2018.

Matching County-Level Waiver Eligibility to ACS 5-Year Pooled Data

Estimates of SNAP households come from pooled 5-year American Community Survey data for 2009 (2007–11 data) and 2018 (2014–18 data). We used pooled data because our unit of analysis is the county, which requires 5-year pooled data for confidentiality reasons. The pooling over five years in the ACS does matter. For example, the number of SNAP households for the 2014–18 period is larger than it would be if we had just looked at 2018.

We match the 2007–11 ACS SNAP Household data to the 2009 county waiver eligibility data. We match the 2014–18 ACS SNAP Household data to the 2018 county waiver eligibility data. The 5-year ACS samples begin with the 2007–11 dataset, which is the best approximation for the SNAP waiver situation in 2009. The most recent ACS data available is for the 2014–18 period, which we determined to be the closest to the 2018 waiver situation.

Fiscal year aggregations of county-level waiver eligibility are matched to calendar year aggregations of ACS 5year pooled data and population estimates for July 1 of a given year.