

A primer on SNAP work requirements

Lauren Bauer and Chloe N. East



OCTOBER 2023

ACKNOWLEDGMENTS

We are grateful to Jason Cook, Wendy Edelberg, Robert Greenstein, Joseph Llobrera, Catlin Nchako, Dottie Rosenbaum, Mary Zaki and particularly Ed Bolen for generous feedback and illuminating conversations. Isabelle Pula, Noadia Steinmetz–Silber, and Elizabeth Cox provided excellent research assistance.

MISSION STATEMENT

The Hamilton Project seeks to advance America’s promise of opportunity, prosperity, and growth.

We believe that today’s increasingly competitive global economy demands public policy ideas commensurate with the challenges of the 21st Century. The Project’s economic strategy reflects a judgment that long-term prosperity is best achieved by fostering economic growth and broad participation in that growth, by enhancing individual economic security, and by embracing a role for effective government in making needed public investments.

Our strategy calls for combining public investment, a secure social safety net, and fiscal discipline. In that framework, the Project puts forward innovative proposals from leading economic thinkers—based on credible evidence and experience, not ideology or doctrine—to introduce new and effective policy options into the national debate.

The Project is named after Alexander Hamilton, the nation’s first Treasury Secretary, who laid the foundation for the modern American economy. Hamilton stood for sound fiscal policy, believed that broad-based opportunity for advancement would drive American economic growth, and recognized that “prudent aids and encouragements on the part of government” are necessary to enhance and guide market forces. The guiding principles of the Project remain consistent with these views.



A Primer on SNAP Work Requirements

Lauren Bauer

The Hamilton Project and The Brookings Institution

Chloe N. East

The Hamilton Project and University of Colorado Denver

October 2023

Abstract

Following welfare reform in 1996, the Supplemental Nutrition Assistance Program (SNAP; formerly the Food Stamp Program) became the only truly universal means-tested safety net program in the U.S. In that same year work requirements in SNAP expanded, limiting the efficacy of the program to support all low-income households. In this FAQ, we explain SNAP work requirements and offer key takeaways to help guide an understanding of work requirement policy, the people subject to work requirements, and features of the labor market in which these SNAP participants work based on rigorous evidence. We believe that the evidence supports ending or severely limiting ABAWD work requirements.

Introduction

The Supplemental Nutrition Assistance Program (SNAP; formerly known as the Food Stamp Program) is a crucial part of the safety net in the United States (U.S.), providing benefits to roughly 41 million Americans per month to maintain a nutritious diet. Following welfare reform in 1996, SNAP became the only truly universal means-tested safety net program in the U.S. In that same year, however, work requirements in SNAP expanded, limiting the efficacy of the program to support all low-income households.

In general, work requirements in means-tested programs are meant to force individuals deemed “work-ready” to increase or maintain their work effort every month by withholding benefits if a person is not working a minimum number of hours, engaged in certain training or education programs, or (for some programs) actively looking for employment.

Since 1996, stringent work requirements for “able-bodied adults without dependents (commonly referred to as ABAWDs)” have been layered over pre-existing (since the 1970s) general work requirements for many working-aged adults receiving SNAP. Debate over whether to change SNAP work requirement rules has intensified in recent years. Proponents of work requirements argue they encourage more people to work, whereas critics say they create barriers to accessing SNAP without meaningfully changing work-related behavior.

There have been recent changes to SNAP work requirements. As part of the debt ceiling negotiation in 2023, the criteria for who is subject to ABAWD work requirements changed, as did the rules governing states’ ability to provide individual hardship exemptions from this requirement. These changes began taking effect on September 1 and come on the heels of the expiration of pandemic-era nationwide suspension of work requirements.

Furthermore, the current Farm Bill—the major legislation that sets rules for SNAP—expired on September 30, 2023. Congress has begun discussions on a new bill, and among the issues on the table are further changes to work requirements.

In this FAQ, we focus on the work requirements that apply only to ABAWDs, but we explain the general work requirements and how they interact with the ABAWD work requirements. We offer key takeaways to help guide an understanding of work requirement policy, the people subject to work requirements, and features of the labor market in which these SNAP participants work. We provide detailed answers to commonly asked questions about SNAP work requirement policy, and we summarize rigorous new research evidence on the efficacy of work requirements and SNAP at encouraging work.

Our conclusion from a review of the literature on work requirements is that the best evidence shows they do not increase employment. Moreover, this research finds work requirements cause a large decrease in participation in SNAP. This is concerning because many SNAP recipients, especially those subject to the ABAWD work requirements, have little safety net to rely on besides SNAP. Additionally, we discuss evidence that those subject to the ABAWD work requirements face difficulty meeting the requirements through no fault of their own, but because of the types of jobs available to them. Finally, we summarize research that suggests work requirements limit SNAP’s ability to act as an automatic stabilizer during recessions.

While we try to explain clearly what work requirement rules are in law and as regulated, in practice, the implementation of work requirements strays from these complicated rules. Rule complexity, administrative burdens, inconsistent implementation, and the realities of the low-wage labor market make it difficult to comply with the rules. Consequently, work requirement penalties—losing access to SNAP if one fails to comply—affect more people than if the rules were implemented exactly as Congress intends.

We believe that the evidence supports ending or severely limiting ABAWD work requirements.

What is SNAP?

SNAP is unique in the landscape of the U.S. safety net because it provides benefits regardless of [household structure](#); e.g. even low-income households without children can be eligible. Additionally, SNAP eligibility is not strictly conditional on work for all beneficiaries, unlike programs like the Earned Income Tax Credit. However, SNAP’s universality diminishes from the imposition of work requirements that apply to various groups of beneficiaries.

The basic eligibility rules to qualify for SNAP are gross income below 130 percent of the poverty line and income net of SNAP-allowable deductions below 100 percent of the poverty line. For 2024, these [income limits](#) for a household of three in the contiguous U.S. are currently \$2,694 and \$2,072 per month. Additionally, Broad-Based Categorical Eligibility gives states the option (that most states take) to increase the gross income eligibility threshold up to 200 percent of the poverty line for SNAP recipients receiving support from other government programs. In April 2023, 41.9 million people in 22.2 million households received SNAP benefits. This is 12.5 percent of the total U.S. population. Slightly more than half of SNAP recipients are not of working age—about 10 percent are over age 64 and 40 percent are below age 18.

SNAP is intended to supplement households' grocery budgets to allow them to afford nutritious food essential to their health and well-being. Among eligible households, benefit amounts are determined based on net income and household size, using the assumption that a household spends 30 percent of its net income on food. Households with no net income to spend on food receive the maximum benefit amount, and as a household's income increases, its benefit amount falls.

The maximum monthly benefit is determined using the Thrifty Food Plan (the Thrifty), developed by USDA, which estimates the cost of a healthy diet at a low price point. The Thrifty is adjusted annually to keep up with food costs. Additionally, a broad re-evaluation of the Thrifty in 2021 accounted for not only changes in food prices, but also changes in Americans' diet patterns, advances in nutrition science, and changes in dietary guidance. This modernization of the Thrifty led to a 21 percent increase in SNAP benefit amounts. For a household of three, the maximum monthly benefit is [currently](#) \$766. Most households receive less than this: the national [average monthly](#) benefit in June 2023 was \$339 per household.

Is SNAP effective?

To understand the effect of SNAP on households' food consumption, researchers often focus on identifying its effects on food insecurity. [Food insecure](#) households are those who at times during the year are uncertain of having, or are unable to acquire, enough food to meet the needs of all their members because they have insufficient resources to purchase food. An estimated 10.2 percent of all U.S. households and 12.5 percent of households with children were food insecure [in 2021](#)—the latest year for which these data have been released by the Current Population Survey. Given that food insecurity typically increases when the economy contracts, it is notable that, overall, food insecurity rates did not rise during the pandemic. Most attribute this stability in food insecurity rates to the swift and sizeable policy response to the pandemic. [Research](#) has found that SNAP reduces food insecurity among participating households overall by one-fifth and among children by one-third.

Beyond improving food security, SNAP causes other positive health and economic outcomes. It improves the health of adults, making them less likely to visit the [doctor](#) multiple times in a year, thus reducing health care costs. Babies whose mothers have access to SNAP while in utero are 5–11 percent [less likely](#) to be born low birthweight, which is a signifier of poor infant health and is related to adverse health and economic outcomes in adulthood.

Critically, there are also longer-run benefits of SNAP participation. The best available evidence shows

that among those who receive SNAP in early-childhood, SNAP causes [improved](#) outcomes across a variety of domains in later childhood and adulthood. This includes [improved](#) health, better [educational](#) and labor market [outcomes](#), and reduced likelihood of [criminal behavior](#). Given these long-run benefits, SNAP is a particularly cost-effective investment in young children, yielding benefits to recipients over time that far exceed the cost to the government for these [transfers](#).

There is also evidence that the purchasing power of SNAP benefits, at least before the Thrifty reform went into effect in 2021, was [inadequate](#). Research shows that SNAP benefits did not last the entire month and many SNAP households went without food towards the end of the month after their SNAP benefits ran out. Among low-income high school students, taking the [SAT](#) around when they would receive SNAP led to better test scores and higher rates of college attendance compared to those who received SNAP several weeks before they took the test and thus were more likely to have run out of food at home.

How does SNAP participation affect the decision to work?

Those who advocate for work requirements argue that the threat of sanction will help counteract of the disincentives to work that result from receiving safety-net benefits. The theory is that SNAP makes participants reluctant to work, or to work more than they currently do because their benefits are reduced if their income goes up.

This theory is not borne out in practice. New rigorous [analysis](#), "The Effect of Means-Tested Transfers on Work: Evidence from Quasi-Randomly Assigned SNAP Caseworkers" by Jason B. Cook and Chloe N. East, provides evidence that participation in SNAP does not reduce work effort.

Using administrative data, Cook and East show that **among new working-age SNAP participants, participation in the program does not change employment or earnings compared to those who do not receive SNAP. This is true regardless of whether the SNAP participant is subject to any work requirements.**

How does this research come to the conclusion that SNAP does not causally affect a participant's decision to work?

When people applied for SNAP, they were randomly assigned to caseworkers who helped them navigate the application process; caseworkers varied in their helpfulness and therefore whether an applicant ended up receiving benefits. The causal effect of SNAP on work-related outcomes was identified by comparing the outcomes of SNAP applicants who are identical, except that due to the random assignment of a caseworker, some received SNAP and some did not.

Earlier research on the impact of SNAP on work found effects of SNAP on work ranging from zero to modest negative effects, but that research studied these effects for people receiving benefits [many decades ago](#) or for very specific and small subgroups of SNAP participants.

What are SNAP work requirements?

In 1996, new work requirements were imposed on a subset of SNAP recipients—so-called “able-bodied adults without dependents” or ABAWDs. ABAWDs are SNAP participants between the ages of 18 and 49 who are able to work, do not have dependents and do not meet other exemption criteria (like being veterans). If ABAWDs are not exempt, they must meet requirements for minimum work activity and requirements for reporting this activity, otherwise they are eligible to receive only three months of SNAP benefits within a 36-month period. ABAWDs have to show that they do at least 80 hours per month of employment or job training; notably, time spent searching for work does not count towards this requirement (as it does with other programs such as Unemployment Insurance). However, states have a limited number of individual hardship exemptions to issue and work requirements for all ABAWDs can be waived or suspended if there is evidence of distress in the local economy and labor market. We discuss these exemptions and waivers in detail below.

There are two categories of work requirements in SNAP: general work requirements and work requirements applicable only to ABAWDs. General work requirements apply to many working-aged SNAP recipients and focus on activities related to finding work or maintaining current work. ABAWD work requirements are much stricter.

New research using high quality administrative data shows that ABAWD work requirements do not increase employment and do reduce program participation among low-income people who have few alternative sources of support besides SNAP. We believe that the evidence supports ending or severely limiting ABAWD work requirements, as several Hamilton Project policy proposals by Hilary Hoynes and Diane Schanzenbach argue.

The decrease in SNAP receipt that results from work requirements is not trivial. Many SNAP recipients, especially those subject to the ABAWD work requirements, have little safety net to rely on besides SNAP. They generally have no meaningful savings, and because they are adults without dependents, they are ineligible for other short-term public safety net programs such as TANF or WIC. Evidence shows that if SNAP applicants are denied SNAP, they have worse

earnings and employment in the long run than if they are accepted, likely because they aren’t able to weather harmful events without the safety net that SNAP provides.

This does not mean SNAP cannot be used to encourage working among low-income people. Existing features of SNAP could be expanded, and new incentives created to encourage work among those able to work and in areas where sufficient jobs exist. This includes expanding the deduction of labor earnings from SNAP income calculations, so that SNAP recipients aren’t penalized for increasing work, and extending SNAP benefits to support people starting new jobs or re-entering the labor market. Lawmakers should consider alternative policies to work requirements that will actually increase work and support low-wage workers. In 2024, we will be releasing a Hamilton Project policy proposal that will provide evidence-based recommendations on effective ways to increase employment among SNAP participants.

What are general work requirements for SNAP participants?

The [general](#) work requirement in SNAP applies to many SNAP recipients aged 16–59. Individuals subject to this requirement are called “work registrants” and must register for work, participate in a training program if offered a place in such a program, take a suitable job if offered, and not voluntarily quit or reduce hours below 30 per week without good reason. Failure to meet these general work requirements disqualifies people from receiving SNAP for at least one month.

What’s an ABAWD?

An ABAWD is an “able-bodied adult with dependents.” “Able-bodied” means that a person is determined to be physically or mentally able to work. “Without dependents” means that the person does not claim as a dependent a child or other qualifying adult on their [tax returns](#). If a non-custodial parent lives (and eats) with a minor child, then they are not considered to be an ABAWD. ABAWDs do not include those who are pregnant.

Prior to September 2023, those between the ages of 18 and 49 were considered “adults” and subject to this requirement. The definition of “adult” recently changed as the Fiscal Responsibility Act of 2023 increased the age range from 18 to 49 to 18 to 52 as of October 1, 2023 and to 54 as of October 1, 2024. The age range will go back to 18 to 49 in 2030.

Defining an ABAWD may seem clear; but, it is not straightforward to document that one is or is not an ABAWD. This required documentation generates costs

that are borne by applicants and SNAP administrators. In addition to checking for the presence of dependents, children, or pregnancy, applicants must submit [documentation](#) of a physical or mental limitation from a qualifying medical professional, be documented as unfit to work by a program caseworker or state agency, or receive disability benefits.

The SNAP Quality Control data suggest about 5 percent of SNAP recipients are ABAWDs, regardless of whether they are actively subject to the work requirements. This translates to 2.1 million of the 39.9 million SNAP recipients in the second half of 2020 (the latest year the data is available).

What are SNAP work requirements for ABAWDs?

On top of the general work requirement, there is an additional work requirement that applies to “able-bodied adults without dependents (ABAWDs).”

ABAWDs cannot receive SNAP benefits if they do not meet an 80-hour per month work or training effort threshold after three (consecutive or inconsecutive) months. Note, this requirement is unique among the landscape of work requirements in the U.S. because it does not allow job search to count as work effort. If an ABAWD is not able to document that they meet work requirements, then they have to wait until the end of the three-year period to be eligible again.

Work requirements do not encourage work but do reduce program access

In theory, work requirements are included in SNAP to encourage participants to increase their work effort, because if they do not work, they will lose access to the program. Therefore, figuring out whether work requirements do—or do not—“work” is a fundamental question. This may seem straightforward to answer, but distinguishing the effect of work requirements from other reasons that SNAP participants change their work habits is quite difficult.

Researchers have undertaken two approaches to try to answer the question of whether ABAWD work requirements are effective in increasing labor force participation, as well as what the effects are on program participation. The best studies use administrative data to estimate the effects of ABAWD work requirements precisely by accurately measuring both the changes in requirements and who is subject to them. Another set of studies model variation in these outcomes using less-precise publicly available data for (1) people who live in places with a waiver from the ABAWD work requirement and those who don’t live in such areas; and (2) people exposed to the work requirement who are

just above or just below the upper age threshold for the requirement.

The papers that study the effect of ABAWD work requirements on labor market outcomes using high quality and precise administrative data consistently find large decreases in SNAP participation as a result of the work requirements, with [no change in employment](#).

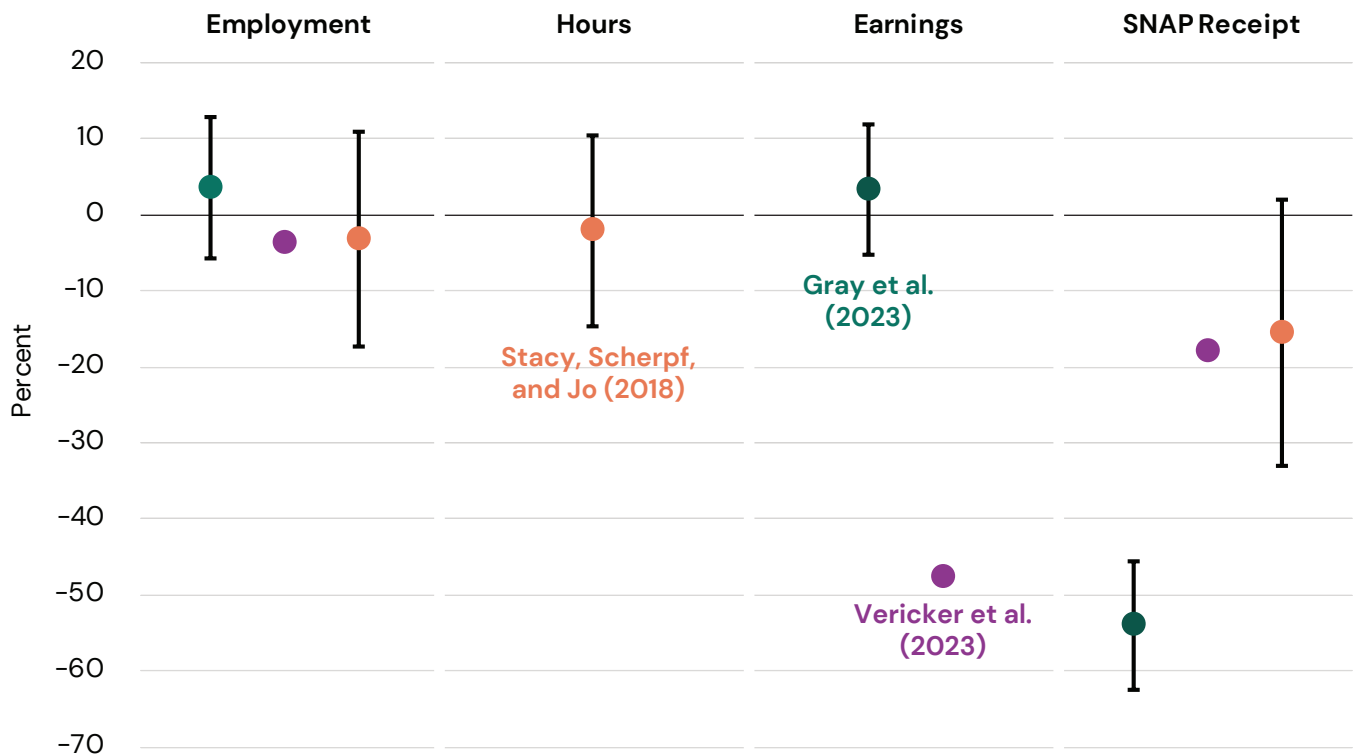
The [research](#) that has best been able to identify the effect of work requirements is “Employed in a SNAP? The Impact of Work Requirements on Program Participation and Labor Supply” by Colin Gray, Adam Leive, Elena Prager, Kelsey Pukelis, and Mary Zaki. They isolate the effects of work requirements from other factors that affect an individual’s decision to work, by studying the imposition of these requirements on SNAP recipients just below age 50 and comparing their subsequent outcomes to the outcomes for people just above age 50, who were not subject to work requirements in this time period. **They find that work requirements have no effect on work but do reduce participation in SNAP by about 50 percent among the exposed population.** This decline is due to decreased retention among current and new enrollees as well as deterrence of potential new enrollees. The authors argue this is because people subject to the work requirements face barriers to finding employment that satisfies the work requirements. We discuss how the characteristics of the low-wage labor market make it hard for ABAWDs to meet work requirements, through no fault of their own, below.

Figure 1 summarizes evidence from this and two other studies that use administrative data to identify the causal effect of work requirement reinstatement on four outcomes: employment, hours worked if working, earnings, and SNAP participation. These studies show that there are no effects on employment or hours worked. Similarly, two of the studies find no effect on earnings, and one shows a reduction in earnings (the opposite of what is expected if work requirements encourage work). Finally, all of the studies estimate negative effects on SNAP participation, though one estimate is not statistically significant.

The second set of studies (not shown in figure 1) that model the effect of ABAWD work requirements using publicly available survey data are different from those that use administrative data in two ways that affect the interpretation of their findings: (1) they do not know precisely who are and are not ABAWDs; and (2) they do not know precisely who lives in a place where one would be exposed to work requirements because public data does not provide precise geographic identifiers and information about waivers is not always reliable or complete. As a result, figuring out who is exempt is not straightforward. These issues necessarily lead to some people in the treatment group (the group of people who are subject to the work requirements) being mistakenly put in the control group (the people

FIGURE 1

Causal estimates of the effect of ABAWD work requirement reinstatement on labor market outcomes and SNAP participation



Source: Gray et al. 2023; Vericker et al. 2023; Stacy, Scherpf, and Jo 2018; authors' calculations.

Note: Figure shows the point estimates and 95 percent confidence intervals (when available) from each paper. Employment, earnings and SNAP receipt in Gray et al. 2023 is measured monthly. Employment, earnings and SNAP receipt in Vericker et al. 2023 is measured quarterly. Employment, hours worked per week and SNAP receipt is measured annually in Stacy, Scherpf and Jo 2018.



who are not subject to work requirements) and vice versa. Therefore, estimates of the effects of work requirements using these methods should be treated with a high degree of caution and not given too much weight.

With these caveats in mind, this second set of papers (not shown in figure 1) has mixed findings on the impact of work requirements on employment—some papers find no effect on employment while others find small increases in [employment](#). However, in these papers that study SNAP participation, they find reductions in SNAP participation when work requirements are put in [place](#).

Are there similar work requirements in other key safety net programs?

The U.S. has increasingly emphasized support to workers through programs that embed work requirements. This includes the Earned Income Tax Credit, which requires at least some work to qualify. Similarly,

Unemployment Insurance requires individuals to have sufficient work history to qualify and requires recipients actively search for a new job to retain benefits.

Programs that have instead been historically targeted at all low-income people, regardless of their work behavior, are the subject of recent debate over adding new work requirements. This threatens to leave virtually no safety net for low-income people who do not work. Below we highlight key moments in work requirement policy in two of these programs besides SNAP: TANF and Medicaid. This is not an exhaustive treatment of work requirements in safety net programs, but highlights that the debate over work requirements is not constrained to SNAP alone.

The shift in the 1990s toward requiring work as a condition to receive safety net benefits affected programs beyond SNAP. One of the most important cash safety net programs—Aid to Families with Dependent Children (AFDC)—was replaced with Temporary Assistance for Needy Families (TANF) in 1996 also as part of welfare reform. Strict work requirements were a [key part](#) of the new TANF program. Because of work

requirements, time limits, other restrictions on benefit receipt, and the conversion of this assistance from an entitlement program to a block grant with fixed federal funding levels that don't increase during recessions, participation in the TANF program is much lower today than participation under its precursor. And, the program no longer acts as an effective automatic stabilizer during recessions.

More recently, states were given permission to apply for waivers to introduce work requirements into Medicaid under the Trump administration. Only one state—Arkansas—actually implemented Medicaid work requirements in this period and a federal judge [quickly](#) suspended Arkansas' work requirements after they led to large-scale disenrollment. The courts overturned proposed work requirements in other states before implementation, because the requirements would limit health coverage, thereby counteracting a “[core objective](#)” of the Medicaid statute. During the debt ceiling debates in spring 2023, some lawmakers proposed work requirements for Medicaid recipients, but this was left out of the bill that was eventually signed into law. However, a waiver instituting a somewhat different work requirement, tied to a limited, new Medicaid expansion, took effect in Georgia in July 2023 after a federal court overturned the federal government's denial of that waiver.

How do exemptions from work requirements work?

Certain ABAWDs are exempt from the work requirement based on their individual characteristics or whether they spend enough time in a qualifying activity. Additionally, states can apply for place-specific waivers from ABAWD work requirements based on local labor market conditions; we describe place-based waivers in more detail below. Finally, since 1997, states have also been able to provide a certain number of hardship exemptions to ABAWDs each month.

States have discretion with how to use these individual exemptions. The number of exemptions that a state can accrue for potential use is based on the size of the states' ABAWD population. Even if an individual is exempted from the ABAWD work requirement, they may still be subject to the general work requirement.

These exemptions do not always work as they are intended. The more complicated an exemption is, the more difficult it is for SNAP applicants and recipients to prove they meet it and for SNAP caseworkers to verify their status. The rules and paperwork requirements keep some people who should be exempt from getting their exemption and thus put in jeopardy their ability to receive SNAP benefits.

Going forward, we recommend that if work requirements remain in place, exemptions and documentation

requirements be simplified and channels for providing pertinent information be fortified. This could include maximizing the number of ways that an individual can prove exemption eligibility, choosing exemption categories that are relatively easy to document, and providing funding for states to better identify exempt participants. New categorical exemptions included in the Fiscal Responsibility Act of 2023 lend themselves to being pilots for developing better systems, such as using other agencies' (like Veterans Affairs) pre-existing databases that have the information required to automatically verify individuals' eligibility for exemptions.

What changed to SNAP work requirements in the debt limit deal in June 2023?

In [June 2023](#), the Fiscal Responsibility Act of 2023 (also known as the deal over the debt ceiling or FRA) made the first changes to who is categorically subject to ABAWD work requirements (outside of recessions) since 1996.

This changed who is subject to and exempt from the ABAWD work requirement. The law raises the age at which individuals can be subject to the ABAWD work requirements. The age range will gradually increase from ages 18–49 to ages 18–54 by October 2024, subjecting people aged 50 to 54 to the ABAWD work requirements for the first time.

In addition, the law creates new exemptions to the ABAWD work requirements for people (regardless of their age) who are:

- homeless;
- veterans; or,
- people who have been in foster care and are under the age of 25.

These individuals are newly exempt from the ABAWD work requirements if they can provide documentation of this status, which is not a given. The age range will go back to 18 to 49 and these new exemptions will be sunset in 2030.

Finally, FRA reduced the number of individual monthly exemptions states can give from the ABAWD work requirements, lowering it from roughly 12 percent of a state's ABAWD caseload to roughly 8 percent. (The 2018 Farm Bill had already reduced the annual share of SNAP participants that could receive an individual exemption from 15 percent of a state's ABAWD caseload to 12 percent.) FRA also contains a provision under which states are no longer allowed to “roll over” monthly hardship exemptions into the next fiscal year if their exemptions are not used up in the current fiscal year, a change that does not sunset in fiscal year 2030.

In scoring these provisions of FRA, CBO estimates approximately 78,000 people on net will be newly enrolled in SNAP over a ten-year period. The net effect reflects both a reduction in enrollment from people aged 50–54 newly subject to the work requirements, and an increase in enrollment from veterans, homeless people, and youth aging out of foster care who are newly exempt from these requirements. As a result, CBO estimates that direct spending on SNAP would increase by \$2.1 billion over the 2023–2033 period.

These estimates are highly uncertain, however, since the new rules just began taking effect in September 2023 and quantifying the size of each group affected is not straightforward. The actual effects of the deal on participation and costs are in truth unknown at this time.

Today, what is the complete list of categorical exemptions from SNAP work requirements?

If an individual is deemed exempt from the general work requirement, then they are also exempt from the ABAWD work requirement. In expectation (but not practice) the exemptions from the general work requirement are:

- A caregiver to a child under age 6 or to someone who is incapacitated;
- Those with a medically-determined disability i.e. are unable to work due to a physical or mental limitation. This can be proven by receiving SSI or SSDI, being determined to be disabled by an eligibility specialist, or being otherwise medically certified as being physically or mentally unfit for work;
- Those meeting work requirements for another program (TANF or unemployment compensation);
- Those participating in an alcohol or drug treatment program; and
- Eligible students (for whom there are additional complex rules to satisfy in order to qualify for SNAP).

States vary in how closely they check that applicants meet the general work requirement exemption criteria. As a result, there are some participants who are subject to the ABAWD work requirement when they should be exempt from both the general and ABAWD work requirements. For example, if a SNAP recipient is also receiving UI and meeting the job search requirements for the UI program, they should be exempt from the general work requirement and thus the ABAWD requirement as well. However, if they are not screened fully for the general requirement, they may be erroneously subject to both requirements.

Additionally, there are several specific groups that are exempt from the ABAWD work requirements, but not the general work requirements:

- Having someone under 18 in your “SNAP household;”
- Those who are homeless;
- Veterans; and,
- Those who have been in foster care and are under the age of 25.

What is the role of SNAP Employment and Training (E&T) programs in work requirements?

SNAP recipients can meet the work requirements by participating in their state’s E&T program. However, there is no requirement for states to provide enough slots in their programs for all interested or mandated participants. Most states operate E&T only in parts of the state or provide less than 20 hours a week of services. In practice, this means that many ABAWDs who try to meet the work requirement are unable to because they cannot access the E&T program.

States differ in how they structure their E&T programs, what types of training and services are offered, how accessible they make these programs, and how many slots they have available for participants.

A handful states require participation in E&T for ABAWDs to meet work requirements. If states choose to do so, there must be an E&T slot made available to a participant. Failure to comply in the first month of SNAP receipt for ABAWDs in states with mandatory E&T results in expulsion from the program. This optional policy route often results in individuals losing benefits before the three months under the ABAWD work requirement.

What activities satisfy the ABAWD work requirements?

Those who are subject to work requirements must prove monthly that they are meeting the requirements. To satisfy work requirements and continue receiving SNAP, ABAWDs must prove that they work at least 80 hours per month (20 hours per week). This work can be paid or unpaid (e.g. volunteering). Besides work, other activities can satisfy this requirement:

- documenting each month that they work or participate in a qualifying work or education program for an average of 20 hours per week;

- participating in a work program through SNAP or another federal, state, or local work program for the number of hours assigned to the recipient each month (the number of hours will depend on the amount of the recipient’s SNAP benefit); or,
- participating in a combination of work and a work program if the hours total to at least 80 hours a month.

Notably, job search activity does not satisfy the ABAWD work requirement, which is an unusual feature of these work requirements compared to other programs in the U.S.

Administrative burdens cause people beyond those who fail to work to be sanctioned by work requirements

The intended target of work requirements is people on SNAP who are able to work but aren’t doing so and could be motivated to work by a work requirement. However, work requirements may affect [many groups](#) beyond that intended target. The extent of the collateral damage caused by work requirements stems from a combination of the federal rules of the road, paperwork burdens, and state-level decisions and implementation.

Indeed, for some proponents of work requirements, challenges in gaining and retaining access to SNAP are a feature and not a bug. Rule complexity, burdensome reporting requirements, bureaucratic gatekeeping, and confusing policy changes all serve to dissuade some of those who are eligible from participating in the program. We distinguish these effects into three types, following Pamela Herd and Don Moynihan’s definition of [administrative burden](#).

Learning costs of work requirements

Work requirement rules and SNAP rules in general are complex. The process of learning about SNAP—how to apply, the work requirements and possible exemptions, and whether an individual might be eligible—can consume considerable time and resources. Eligible people can be excluded from SNAP simply because they do not understand the work requirement policy details. Examples of participants affected by this are:

- those who are unable to work but have not received a medically-sanctioned or other “good cause” exemption from work requirements;

- those who do not have stable housing or access to technology and thus have a hard time communicating with SNAP caseworkers;
- those who have limited literacy or face language barriers; and,
- those who are in fact meeting the work requirement standard but fail to understand the requirement and to provide the requisite documentation.

Compliance costs of work requirements

The basic SNAP application process is complex and time-consuming: there are complicated application forms, required interviews, and necessary documentation, which can include paystubs, bank statements, proof of rent/mortgage payments, utility bills, child care bills, and so forth.

On top of this, documenting compliance with the ABAWD work requirement requires verification of employment hours per week. Examples include providing corroboration from their employer that includes pay per week and hours per week, which is especially challenging for self-employed and workers in non-traditional jobs or, if they were recently unemployed, proof of employment ending.

Work requirement documentation thus substantially increases the time and effort necessary to complete the paperwork needed to prove eligibility for SNAP and compliance with SNAP rules. In addition, the rigid rules about what counts as work activity to satisfy the requirements make complying still more challenging, especially given the volatility in earnings and hours in the low-wage labor market. Examples of participants affected by this are:

- those who want to enroll in training programs, but cannot find a spot in such a program (states are not required to provide ABAWDS spots in these programs unless they are a mandatory E&T state); and,
- those who are working but not consistently above the 20-hours-a-week threshold.

Psychological costs of work requirements

As SNAP applicants have indicated, the process of applying for SNAP can be stigmatizing and patronizing. They [report](#) that caseworkers frequently talk down to them and ask questions that feel invasive about their personal lives and decisions. Work requirements add to these costs by restricting the choices that SNAP recipients can make about what types of jobs to take and how many hours to work, as well as by requiring

additional intensive monitoring of SNAP recipients. Examples of groups affected by this are:

- those who view the reporting requirements as invasive and either for that reason or another reason do not provide the requisite documentation; and,
- those who become frustrated trying to figure out what documentation is necessary or how to secure it and whether they will be eligible—and are deterred from applying at all.

These administrative burdens have real effects on SNAP recipients and potential SNAP recipients, given the evidence discussed above that the imposition of work requirements substantially reduces participation in SNAP.

The low-wage labor market and SNAP work requirements

Because SNAP is a means-tested program, individuals who are eligible are people who earn relatively low wages and those who do not work at all. Research shows that the low-wage labor market that SNAP recipients work in is much more volatile than the labor market for the middle class. That volatility makes it hard for SNAP recipients to find work and to work enough hours to meet the arbitrary work requirement threshold. Indeed, most working-age SNAP recipients who can work either already do work or would like to work more than they do, but may not be able to find employment that satisfies the work requirements.

Our interpretation of the research evidence, a literature to which we have contributed, is that SNAP work requirements do not assist adults in obtaining employment. Furthermore, work requirements do not spur increased work effort that would lead to higher earnings. Notably, we discuss new evidence that shows low-wage workers use SNAP as insurance to help them weather hardships and this insurance actually allows them to work more in the longer-run.

What labor market conditions do SNAP recipients face?

[Research](#) shows that people who are likely to receive SNAP generally face a very different labor market than middle class workers. SNAP recipients work low-wage jobs, and 29 percent remain below the poverty line even if they are working more than 30 hours per week for at least half the year (dubbed “substantial work” by the researchers).

The most common occupations among SNAP recipients have median annual earnings of only \$22,000 and an unemployment rate of 5.3 percent in 2017,

compared to \$47,600 and 2.4 percent for middle-class occupations (2017 dollars). These common occupations among SNAP recipients have also seen no real wage growth in the past several decades and are much more likely to have job displacement than middle-class occupations. Moreover, common occupations among SNAP recipients generally do not put them on a ladder towards higher earnings and higher quality jobs in the future—among those working in occupations common among SNAP recipients, if workers have substantial work in one year, they are likely to have earnings that are lower the following year.

Most SNAP recipients who are able to work have at least some attachment to the labor market and evidently want to work, but because of the [types of jobs](#) they are able to get, their earnings are low and they face volatile labor markets with high rates of job turnover and unstable hours. This makes it hard to secure and maintain the employment necessary to satisfy the rigid ABAWD work requirements and to eventually move up the job ladder.

How does a monthly 80-hour threshold for ABAWD work requirements affect workers?

Among SNAP recipients who are likely ABAWDs (aged 18–49 with no minor children and no receipt of disability benefits), about [half already work](#) during the month of SNAP receipt and three-quarters work within a year of SNAP receipt. Thus, looking only at very short-term snapshots of work overstates the amount of time SNAP recipients spend not working.

The strict threshold of 80 hours per month does not account for the volatility present in the low-wage labor market. For example, [analysis](#) of the occupations in which SNAP recipients most often work reveals that work hours in these occupations are volatile and that this volatility is driven by the characteristics of these occupations, not by the characteristics of SNAP recipients. In 2017, occupations that SNAP recipients most commonly work in had an unemployment rate more than double the rate for occupations that paid above the median wage. Thus, many SNAP recipients may fail to meet the work requirement threshold due to the nature of the jobs they hold, not because they do not want to work more.

Furthermore, for The Hamilton Project, Lauren Bauer, Diane Whitmore Schanzenbach, and Jay Shambaugh [modeled](#) how ABAWD SNAP participants meet or do not meet the 20-hour threshold over a period of two years. They found that only 25 percent were labor force nonparticipants (meaning they did not work at all over the two-year period). Some 58 percent worked at least 20 hours a week for at least one month over the two years. Yet 25 percent worked more than 20 hours a week at some point but still fell below the 20-hour

threshold for at least one month over the two-year period. This is evidence that the inflexible 80-hour per month threshold does not take into account volatility in the low-wage labor market.

Why do low-wage workers participate in SNAP?

In their analysis described above, Cook and East also investigated why their main finding—that SNAP does not causally affect a participant’s decision to work—differs from conventional wisdom.

They find that this is partly driven by the fact that many working-age SNAP recipients face other barriers to work. For example, among SNAP recipients in 2019 who were aged 18–49, some 20 percent either had a disability themselves or lived with someone with a disability, and 29 percent had a pre-school-aged child.

They further find that working-aged SNAP recipients who were able to work and who worked prior to applying for SNAP apply for SNAP when they [experience a hardship](#) such as a layoff, divorce, or childbirth. This population has a very limited ability to weather such a hardship using private savings—only 60 percent of working-aged SNAP recipients had a bank account before receiving SNAP and of those that did, the median amount saved was \$426 (calculated from the Survey of Income and Program Participation). Thus, SNAP provides important resources to help recipients get back on their feet.

From the Cook and East work, figure 2 shows work-related outcomes for SNAP applicants if they were accepted into SNAP (navy blue) and if those same people were instead denied SNAP (orange). Figure 2a then shows whether SNAP participation causes a change in employment, while figure 2b shows the effect on earnings.

Regardless of actual SNAP receipt, new applicants to SNAP exhibit a large decrease in employment and earnings right around the time of application. Additionally, if granted SNAP, recipients have slightly lower earnings and employment right after the receipt of SNAP.

However, this decline in employment and earnings is very short-lived. The research finds that if all new applicants to SNAP were denied access to the program, employment and earnings would continue to fall in the years after SNAP application so that three years later, only 34 percent would be working, compared to 100 percent working before applying for SNAP. On the other hand, if these applicants are provided SNAP, they are more likely to work three years after, with an employment rate of 73 percent at that time.

Why should work requirements be suspended when there are few available jobs?

The primary indicators that economists use to determine whether the economy are in a recession are real personal income (excluding transfers from the government) and nonfarm payroll employment. In other words, when labor market conditions show a reduction in employment and earnings, there is evidence that the economy is contracting. Nonetheless, there are always places within the U.S. where local labor markets are struggling. Typical ways to identify such areas are those places with high or relatively high levels of unemployment or people working part-time for economic reasons (PTER). When many people are seeking work but unable to find it, it is evidence that there are fewer jobs available than people who want employment. When many people are working part-time but would prefer to work more, it is evidence that there are not enough hours of work available to the employed. In addition, when the overall numbers indicate that there is weakness in the aggregate economy and labor market, it is always the case that conditions are worse in the low-wage labor market.

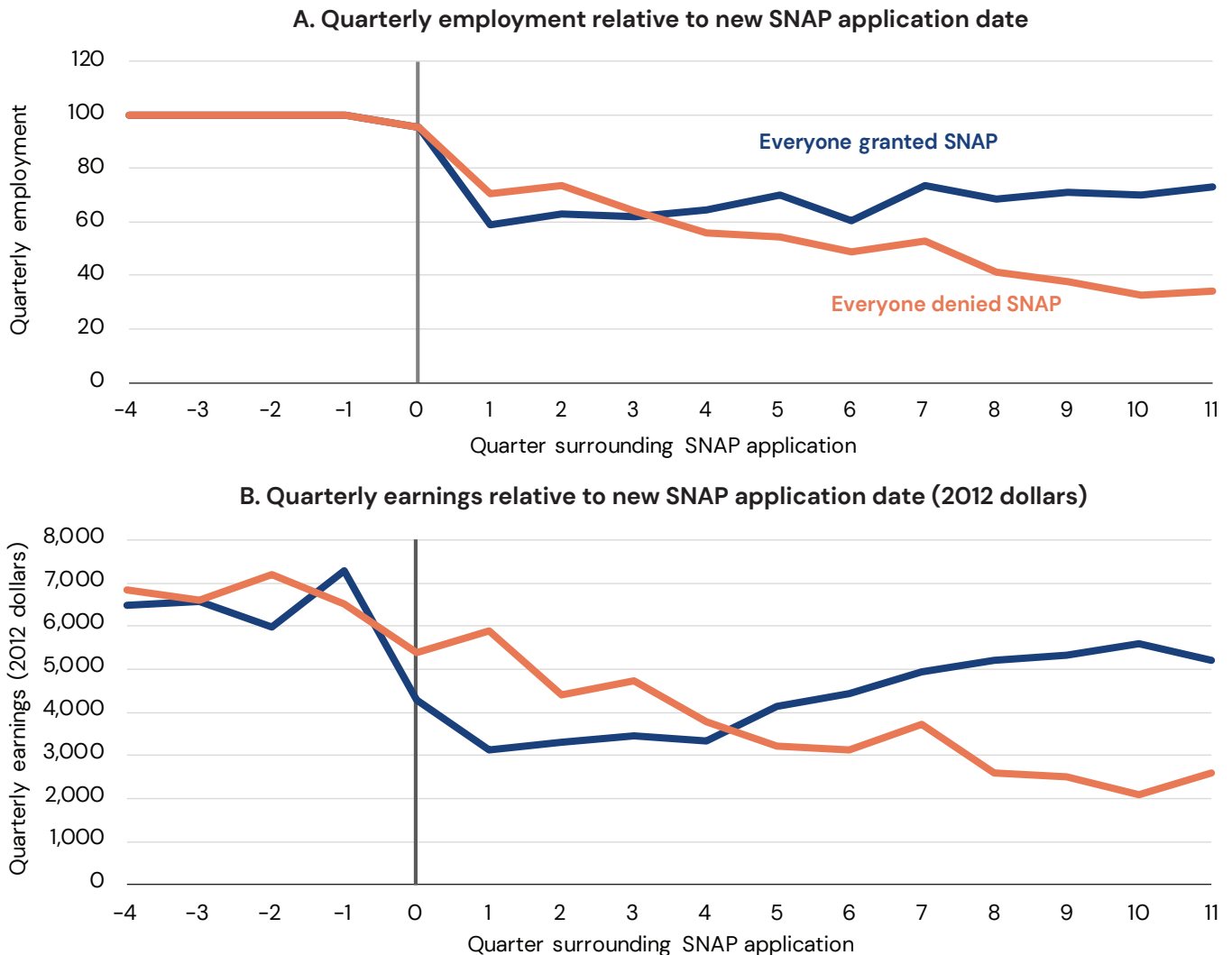
When there is evidence that there are not enough jobs and/or not enough full-time jobs, it is unfair to expect that SNAP participants who are subject to work requirements should be held to the rules. Therefore, there’s a safety value for work requirements when economic conditions warrant: waivers for places and Congressional suspensions. When a waiver or suspension is in effect, all ABAWDs are exempt from work requirements.

In a world where ABAWD work requirements as described above are the law of the land, ensuring that work requirement waivers based on labor market conditions are implemented is the first best policy solution. Waivers and suspensions ensure that eligible participants are not unduly punished for circumstances beyond their control. And such waivers are also instrumental to an economic recovery, as SNAP participants spend money quickly and locally, stimulating the economy.

Congress has suspended work requirements nationwide by hand in the past two recessions. Consistent with proposals for other countercyclical social insurance programs, The Hamilton Project has a policy proposal that offers ideas for how to automatically suspend work requirements when economic conditions warrant. Because requesting place-based waivers is optional for states, there are labor markets that would qualify for suspension where ABAWDs are nevertheless subject to work requirements and their consequences. For horizontal equity, policymakers should consider letting USDA track and exempt places based on the rules in law and regulation.

FIGURE 2

Effect of SNAP Receipt on Applicants' Employment and Earnings



Source: Cook and East 2023.

Note: The graphs show the employment and earnings outcomes expected if all new SNAP applicants were accepted onto SNAP (navy blue) or if all new SNAP applicants were denied SNAP (orange). The horizontal axis denotes time relative to SNAP application in quarters, where 0 is the quarter of SNAP application. Employment and earnings are measured quarterly



What are place-based work requirement waivers?

Since 1996, states and areas within a state are eligible for area-wide waivers from the ABAWD work requirements when there is evidence of a “lack of sufficient jobs” in the state or local labor market. The intent of a work requirement waiver is to ensure that at times when and in places where it is difficult to find work, ABAWDs are not penalized for not meeting the work requirement. These waivers exempt all ABAWDs from work requirement rules and penalties, including those who have already come under sanction.

What evidence of a weak labor market must a state provide to USDA to qualify for a place-based waiver?

States must apply to USDA for place-based waivers (except when work requirements are suspended by Congress as discussed below). A request to USDA to waive work requirements in a specified area must be accompanied by analysis that shows empirical evidence of either a lack of sufficient jobs in the labor market or a very high unemployment rate (10 percent or more) in that place.

As there is no one way to identify the conditions that make it difficult to secure employment, there are

several measures of labor-market weakness (“lack of sufficient jobs”) in the current ABAWD work requirements rules that are used to determine whether a local or state area qualifies for a waiver.

The state must be able to provide evidence that the state or a state-determined sub-state area:

- has a recent twelve-month average unemployment rate over 10 percent;
- has a recent three-month average unemployment rate over 10 percent;
- has a historical seasonal unemployment rate over 10 percent;
- is designated by the U.S. Department of Labor as a Labor Surplus Area (LSA);
- qualifies for Extended Benefits to Unemployment Insurance (EB);
- has a low and declining employment-to-population ratio;
- has a lack of jobs in declining occupations or industries;
- is described in study or other publication as an area where there is a lack of jobs; or
- has a 24-month average unemployment rate 20 percent above the national average for the same period, starting no earlier than the start of the LSA designation period for the current fiscal year.

A state qualifies for Extended Benefits to Unemployment Insurance (UI) if the state has:

- a 13-week Insured Unemployment Rate (IUR) that is at least 5 percent and equals at least 120 percent of the IUR for both of the last two years;
- a 13-week IUR of at least 6 percent; or
- a 3-month Total Unemployment Rate (TUR) that is at least 6.5 percent and at least 110 percent of the TUR for either of the last two years.

The IUR reports the share of people currently receiving UI among the labor force participants who are covered by UI. The TUR is the share of unemployed in the labor force.

During the Great Recession, an additional criterion for a waiver was added on a temporary basis. Congress enacted Emergency Unemployment Compensation, a temporary program that extended the amount of time during which an eligible UI participant could receive UI benefits. Congress authorized EUC on June 30, 2008, extending the expiration date to January 1, 2014 in the American Taxpayer Relief Act of 2012. The Bush Administration clarified on January 8, 2009 that eligibility for particular tiers of EUC also qualified states for SNAP waivers. While EUC was in place, ABAWD work requirements were waived.

What areas can a place-based waiver cover?

A state agency or Governor can submit a request to waive the ABAWD work requirements for a specific geographic area.

States have broad discretion to identify and define areas that meet the criteria for a waiver, both state-wide and sub-state areas. States are permitted to apply to the USDA for waivers to the time limit provisions for the entire state, as well as for sub-state geographic areas, if their economic conditions meet certain standards. Provided that a state can produce the necessary analysis regarding the areas’ labor market characteristics and show that within a selected area the labor market conditions warrant a waiver, states have substantial discretion for designating waiver areas. In addition to recognizable geographies like cities, counties, Indian reservations and labor market areas, the state can group together contiguous areas, or non-contiguous areas belonging to a state-recognized economic region.

What did the Trump administration try to do to place-based waivers?

The Trump administration was vocal about its desire to expand work requirements under SNAP and other safety net programs.

In December 2018, after Congress passed a Farm Bill that made no changes to work requirements, USDA issued a notice of proposed rulemaking that would change the conditions under which a state could apply for a place-based waiver to the ABAWD work requirements.

The notice proposed several modifications, including that:

- there could be no statewide waivers granted, unless a state qualified for Extended Benefits (EB) to Unemployment Insurance;
- states could no longer determine the substate geographies a waiver could cover;
- an unemployment rate of less than 10 percent in a recent three-month period could only serve as evidence of a weak labor market in “an exceptional circumstance (p. 983),” such as “the rapid disintegration of an economically and regionally important industry or the prolonged impact of a natural disaster (p. 985).”
- the so-called “20 percent rule” (see item #9 above) could be applied only if an area has an average unemployment rate that is at least 20 percent above the national average and is at least 7 percent for a recent 24-month period.

The notice also proposed eliminating a state’s capacity to bank unused individual exemptions to work requirements.

The Hamilton Project submitted a [comment](#) to this rule, arguing that the proposed rule was arbitrary, that the Regulatory Impact Analysis failed to model the effects correctly or to consider a sufficiently complete set of cost and benefit analyses, and that the rule would weaken the safety net and the countercyclical tenets of the SNAP program. In addition, The Hamilton Project wrote [several papers](#) on the negative consequences of implementing this rule and its then-Director Jay Shambaugh [testified](#) before Congress on the subject.

The final rule that resulted from the notice and comment process limited the economic conditions that would qualify an area for a waiver, put a 6 percent national unemployment rate floor under the 20 percent rule, and removed EB as a means for a state to qualify for waivers (which was not part of the original notice).

In March 2020, however, a U.S. District Court [is-sued](#) a preliminary injunction temporarily halting the rule’s implementation. In October 2020, the court ordered USDA to [vacate](#) the rule, which means that it would never go into effect.

How do SNAP work requirements impede the economic recovery from a recession?

SNAP is a [key part](#) of the U.S. safety net, which on the whole is intended to provide income support and services to meet basic needs and to promote economic opportunity. Safety net programs for which participants are eligible due to their incomes—and which operate on an entitlement basis—are called “automatic stabilizers” because they [expand automatically](#) (without requiring new legislation) as the economy contracts and incomes fall. SNAP is one such automatic stabilizer. SNAP is uniquely positioned to respond to fluctuations in economic conditions and provide countercyclical stimulus because SNAP provides benefits to income-eligible families [regardless](#) of household structure and includes households with no other income.

Figure 3 shows the relationship between economic conditions, as measured by the unemployment rate on the left-hand-side axis, and SNAP receipt. We look at both SNAP participation—the percent of people receiving SNAP—on the left-hand-side axis—and the dollars of SNAP benefits received per capita—on the right-hand-side axis. Since the recession in the early 1990s, SNAP has been responsive to economic conditions. Importantly, SNAP responds not only in the early days of the recession, but continues to provide benefits as the unemployment rate takes multiple years to recover. SNAP has been especially responsive in the last two recessions—the Great Recession and the COVID-19 recession—providing necessary aid

to low-income households and economic stimulus to aid in the recovery. This responsiveness is in part due to waivers of work requirements implemented in the last two recessions, discussed below.

SNAP provides localized economic stimulus because recipients make purchases at grocery stores and other qualified retailers and because participants spend the money quickly: on average, [97 percent](#) of SNAP benefits are spent within a month of receipt. As people spend their SNAP benefits, this helps maintain aggregate demand and stimulate the economy through retail, transportation, wholesale, and agriculture spending. This spending generates substantial economic activity: past estimates suggest that during recessions, \$1 billion in SNAP benefits would translate to \$1.54 billion in GDP due to these multiplier effects.

Work requirements can [impede](#) SNAP’s ability to provide a safety net to Americans during a recession and to help stimulate an economic recovery through food spending. If the ABAWD work requirements are in effect, they will impose time limits on SNAP benefit receipt among ABAWDs who are unemployed or underemployed because of economic conditions.

SNAP work requirements also make it harder for local economies with distressed labor markets to recover if waivers are not in effect. Waivers are crucial to allow SNAP to stimulate and stabilize labor markets where there is evidence there are not sufficient jobs. This is especially true because low-income workers—who are more likely to be [eligible](#) for SNAP—are hit [particularly hard](#) during economic downturns and thus are likely to face challenges both to maintaining consumption and to finding new employment. A past Hamilton Project [policy proposal](#) by Hilary Hoynes and Diane Whitmore Schanzenbach called attention to this issue and suggested limiting or eliminating SNAP work requirements in order to maximize SNAP’s capacity as economic stimulus.

Has Congress ever suspended work requirements?

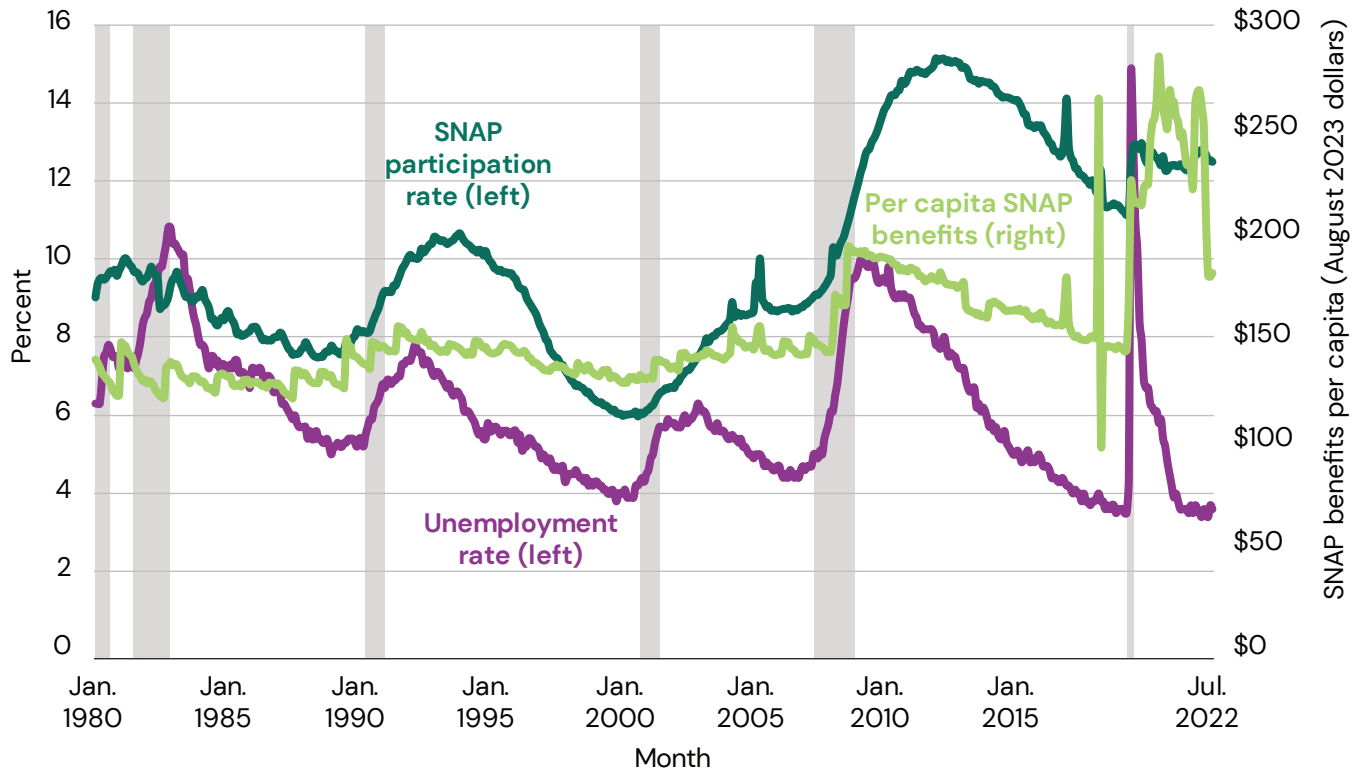
Congress has suspended SNAP work requirements in each of the past two recessions.

In the American Recovery and Reinvestment Act (ARRA), Congress authorized a nationwide SNAP work requirement waiver from February 17, 2009 through September 30, 2010. While a few localities declined this authorization, every place in the United States was eligible without having to provide documentation. Many states extended this waiver beyond the 2010 deadline due to continued weak labor markets that meant they continued to qualify for waivers.

Similarly, one of the first federal actions taken at the onset of the COVID-19 pandemic was to suspend SNAP’s ABAWD work requirement nationwide. The

FIGURE 3

Unemployment, SNAP participation, and per capita SNAP benefits, 1980 through June 2023



Source: USDA n.d.; BLS n.d.; authors' calculations.

Note: Shaded areas denote recessions. Per capita SNAP benefits are inflation-adjusted using the CPI-U to 2023 dollars. The large spike and sequential decline in SNAP benefits around January 2019 reflects the 35-day government shutdown, in which most of the February 2019 SNAP benefits were issued in January of 2019 in order for recipients to receive their benefits in a timely manner. Therefore, January 2019 benefits appear much higher than those of the previous months and February's benefits appear much lower.



nationwide suspension was in effect for as long as the U.S. was operating under a public health emergency: from April 1, 2020 through June 30, 2023. When work requirements were suspended, a state [could](#) reimpose work requirements only if they offered an E&T slot to all participants subject to the ABAWD work requirement.

Following the reinstatement of SNAP work requirements at the sunset of the nationwide public health emergency, states were allowed to restart the time-limit clock on all recipients who are subject to these limits. Specifically, states could 1) reset the 36-month clock for the entire ABAWD caseload starting in July 2023 or 2) keep the 36-month clock as it was but remove all prior months that would otherwise be countable towards the 3-month time limit for ABAWD cases. Thus, for SNAP recipients who faced a new 3-month time limit following the end of the public health emergency, October 2023 is the first month in which ABAWDs could stop receiving benefits for failure to document compliance.

References

Agricultural Act of 1970. HR 18546. Pub. L. No. 91-524, 84 Stat. 1358.

Almond, Douglas, Hilary Whitmore Hoynes, and Diane Whitmore Schanzenbach. 2011. "Inside the war on poverty: The impact of food stamps on birth outcomes." *The review of economics and statistics* 93, no. 2: 387-403.

Bailey, Martha J., Hilary W. Hoynes, Maya Rossin-Slater, and Reed Walker. 2020. "Is the social safety net a long-term investment? Large-scale evidence from the food stamps program." *National Bureau of Economic Research*, no. w26942.

Barr, Andrew, and Alexander A. Smith. 2023. "Fighting crime in the cradle: The effects of early childhood access to nutritional assistance." *Journal of Human Resources* 58, no. 1: 4373.

Bauer, Lauren. 2021. "A healthy reform to the Supplemental Nutrition Assistance Program: Updating the Thrifty Food Plan." Brookings Institution, Washington, DC.

Bauer, Lauren, Jana Parsons, and Jay Shambaugh. 2019. "Comment on FR Doc # 2018-28059." Brookings Institution, Washington, DC.

Bauer, Lauren, Jana Parsons, and Jay Shambaugh. 2019. "How do work requirement waivers help SNAP respond to a recession?" The Hamilton Project, Washington, DC.

- Bauer, Lauren, Jana Parsons, and Jay Shambaugh. 2020. "Who stands to lose if the final SNAP work requirement rule takes effect?" The Hamilton Project, Washington, DC.
- Bauer, Lauren, Diane Whitmore Schanzenbach, and Jay Shambaugh. 2018. "Work requirements and safety net programs." The Hamilton Project, Washington, DC.
- Bernstein, Jared, and Ben Spielberg. 2016. "Preparing for the Next Recession: Lessons from the American Recovery and Reinvestment Act." Center on Budget and Policy Priorities, Washington, DC.
- Bitler, Marianne, and Hilary Hoynes. 2016. "The more things change, the more they stay the same? The safety net and poverty in the Great Recession." *Journal of Labor Economics* 34, no. S1: S403–S444.
- Bitler, Marianne, Jason Cook, and Jonathan Rothbaum. 2021. "Working for your bread: The labor supply effects of SNAP." *AEA Papers and Proceedings*, 111, 496–500. Nashville, TN: American Economic Association.
- Bond, Timothy N., Jillian B. Carr, Analisa Packham, and Jonathan Smith. 2022. "Hungry for success? SNAP timing, high-stakes exam performance, and college attendance." *American Economic Journal: Economic Policy* 14, no. 4: 51–79.
- Brantley, Erin, Drishti Pillai, and Leighton Ku. 2020. "Association of work requirements with Supplemental Nutrition Assistance Program participation by race/ethnicity and disability status, 2013–2017." *JAMA network open*, 3, no. 6: e205824–e205824.
- Burnside, Ashley. 2023. "SNAP Time Limits Can Reduce Access for Disabled People." The Center for Law and Social Policy, Washington, DC. April 25, 2023.
- Butcher, Kristin F., and Diane Whitmore Schanzenbach. 2018. "Most workers in low-wage labor market work substantial hours, in volatile jobs." Center on Budget and Policy Priorities, Washington, DC.
- Canning, Patrick, and Rosanna Mentzer Morrison. 2019. "Quantifying the Impact of SNAP Benefits on the U.S. Economy and Jobs." *Amber Waves: The Economics of Food, Farming, Natural Resources, and Rural America*, U.S. Department of Agriculture.
- Center on Budget and Policy Priorities. 2022. "Policy Basics: Temporary Assistance for Needy Families." Last modified March 1, 2022. Washington, DC.
- Center on Budget and Policy Priorities. 2022. "Policy Basics: The Supplemental Nutrition Assistance Program (SNAP)." Last modified June 9, 2022. Washington, DC.
- Chappell, Bill. 2020. "Court Vacates Trump Administration Rule That Sought to Kick Thousands off Food Stamps." NPR. Accessed September 26, 2023. <https://www.npr.org/2020/10/19/925497374/court-vacates-trump-administration-rule-that-sought-to-kick-thousands-off-food-s>.
- Cook, Jason B., and Chloe N. East. 2023. "The Effect of Means-Tested Transfers on Work: Evidence from Quasi-Randomly Assigned SNAP Caseworkers." *National Bureau of Economic Research*, no. w31307.
- Cronquist, Kathryn, and Brett Eiffes. 2020. "Characteristics of Supplemental Nutrition Assistance Program Households: Fiscal Year 2020." U.S. Department of Agriculture, Food and Nutrition Service, Office of Policy Support, Alexandria, VA.
- Cuffey, Joel, Timothy KM Beatty, and Elton Mykerezi. 2022. "Work effort and work requirements for food assistance among U.S. adults." *American Journal of Agricultural Economics* 104, no. 1: 294–317.
- DC Department of Human Services. n.d. "SNAP Eligibility: General Requirements." <https://dhs.dc.gov/service/snap-eligibility-general-requirements>.
- District of Columbia et al v. U.S. Department of Agriculture et al*, No. 1:20-cv-00119. 2020.
- East, Chloe N., and David Simon. 2020. "How Well Insured are Job Losers? Efficacy of the Public Safety Net." *National Bureau of Economic Research*, no. w28218.
- East, Chloe N. 2018. "Immigrants' labor supply response to Food Stamp access." *Labour Economics* 51: 202–226.
- East, Chloe N. 2020. "The effect of food stamps on children's health: Evidence from immigrants' changing eligibility." *Journal of Human Resources* 55, no. 2: 387–427.
- Edin, Kathryn, Melody Boyd, James Mabli, Jim Ohls, Julie Worthington, Sara Greene, Nicholas Redel, and Swetha Sridhara. 2013. "SNAP food security in depth interview study." Food and Nutrition Service, U.S. Department of Agriculture, Alexandria, VA.
- Gould, Elise, and Melat Kassa. 2021. "Low-wage, low-hours workers were hit hardest in the COVID-19 recession." Economic Policy Institute, Washington, DC.
- Gray, Colin, Adam Leive, Elena Prager, Kelsey Pukelis, and Mary Zaki. 2023. "Employed in a SNAP? The impact of work requirements on program participation and labor supply." *American Economic Journal: Economic Policy* 15, no. 1: 306–341.
- Herd, Pamela, and Donald P. Moynihan. 2019. *Administrative burden: Policymaking by other means*. New York, NY: Russell Sage Foundation.
- Hoynes, Hilary, Diane Whitmore Schanzenbach, and Douglas Almond. 2016. "Long-run impacts of childhood access to the safety net." *American Economic Review* 106, no. 4: 903–934.
- Hoynes, Hilary, and Diane Whitmore Schanzenbach. 2019. "Strengthening SNAP as an automatic stabilizer." Brookings Institution, Washington, DC.
- Hoynes, Hilary, and Diane Whitmore Schanzenbach. 2010. "Work incentives and the Food Stamp Program." *Journal of Public Economics*, 96, no. 1–2, 151–162.
- Internal Revenue Service Tax Forms. 2021. Publication 4491. Accessed September 25, 2023. https://apps.irs.gov/app/vita/content/globalmedia/4491_dependency_exemptions.pdf.
- Keith–Jennings, Brynne, and Vincent Palacios. 2017. "SNAP helps millions of low-wage workers." Center on Budget and Policy Priorities, Washington, DC.
- Keith–Jennings, Brynne. 2015. "SNAP Promotes Long-Term Gains, Especially for Children." Center on Budget and Policy Priorities, Washington, DC. December 11, 2015.
- Lang, Kevin, and Ariella Kahn–Lang Spitzer. 2020. "Race discrimination: An economic perspective." *Journal of Economic Perspectives* 34, no. 2: 68–89.
- Lee, Vivien, and Louise Sheiner. 2019. "What are automatic stabilizers?" Brookings Institution, Washington, DC.
- Leftin, Joshua, Nancy Wemmerus, James Mabli, Thomas Godfrey, and Stephen Tordella. 2014. "Dynamics of Supplemental Nutrition Assistance Program Participation from 2008 to 2012." Food and Nutrition Service, U.S. Department of Agriculture, Alexandria, VA.
- Llobrera, Joseph, Lauren Hall, Matt Broaddus, Catlin Nchako, Alicia Mazzara, Erik Gartland, Will Fischer, Kris Cox, Samantha Waxman, Harjot Sodhi, Stephanie Hingtgen, and Liz Schott. 2021. "A Frayed and Fragmented System of Supports for Low-Income Adults Without Minor Children." Center on Budget and Policy Priorities, Washington, DC.
- Llobrera, Joseph. 2023. "Most Working-Age SNAP Participants Work But Job Instability Overstates Joblessness in Some Analyses." Center on Budget and Policy Priorities, Washington, DC. May 19, 2023.
- Mabli, James, Thomas Godfrey, Nancy Wemmerus, Joshua Leftin, Stephen Tordella. 2014. "Determinants of Supplemental Nutrition Assistance Program Participation from 2008 to 2012." Food and Nutrition Service, U.S. Department of Agriculture, Alexandria, VA.
- Macartney, Suzanne, Robin Ghertner. 2023. "Participation in the U.S. Social Safety Net: Multiple Programs, 2019." Secretary for Planning and Evaluation, U.S. Department of Health and Human Services, Washington, DC.
- Nunn, Ryan, Jana Parsons, and Jay Shambaugh. 2019. "Race and underemployment in the U.S. labor market." Brookings Institution, Washington, DC.

- Ribar, David C., Marilyn Edelhoach, and Qiduan Liu. 2010. "Food stamp participation among adult-only households." *Southern Economic Journal* 77, no. 2: 244-270.
- Schanzenbach, Diane Whitmore. 2013. "Strengthening SNAP for a more food-secure, healthy America." The Hamilton Project, Washington, DC (2013).
- Schneider, Andy. 2019. "Medicaid Work Requirements: Another Win for Beneficiaries, Another Loss for CMS." Georgetown University McCourt School of Public Policy, Center for Children and Families, Washington, DC.
- Shambaugh, Jay. 2019. "Examining the Proposed ABAWD Rule and its Impact on Hunger and Hardship." Statement of Jay C. Shambaugh, Director, The Hamilton Project, Senior Fellow in Economic Studies, The Brookings Institution, and Professor of Economics, The George Washington University, before the U.S. House Nutrition, Oversight, and Department Operations Subcommittee, April 3, 2019.
- Stacy, Brian, Erik Scherpf, and Young Jo. 2018. "The impact of SNAP work requirements." Paper presented at the Society of Government Economists Annual Conference.
- U.S. Bureau of Labor Statistics. 2023. "Table A-2. Employment status of the civilian population by race, sex, and age." Last modified September 1, 2023. <https://www.bls.gov/news.release/empsit.t02.htm>.
- U.S. Department of Agriculture, Food and Nutrition Service. 2023. "Fiscal Year 2024 Cost-of Living Adjustments." Alexandria, VA.
- U.S. Department of Agriculture, Food and Nutrition Service. 2023. "Persons, Households, Benefits, and Average Monthly Benefit per Person & Household." Alexandria, VA. <https://www.fns.usda.gov/pd/supplemental-nutrition-assistance-program-snap>.
- U.S. Department of Agriculture, Food and Nutrition Service. 2021. "SNAP - Preparing for Reinstatement of Time Limit for ABAWDs." Alexandria, VA.
- U.S. Department of Agriculture, Food and Nutrition Service. 2023. "SNAP Provisions in the Fiscal Responsibility Act of 2023." Alexandria, VA.
- U.S. Department of Agriculture, Food and Nutrition Service. 2023. "SNAP Work Requirements." Last modified September 1, 2023. <https://www.fns.usda.gov/snap/work-requirements>.
- Vericker, Tracy, Laura Wheaton, Kevin Baier, and Joseph Gasper. 2023. "The Impact of ABAWD Time Limit Reinstatement on SNAP Participation and Employment." *Journal of Nutrition Education and Behavior* 55, no. 4: 285-296.
- Wagner, Jennifer, and Jessica Schubel. 2020. "States' Experiences Confirm Harmful Effects of Medicaid Work Requirements." Center on Budget and Policy Priorities, Washington, DC.
- Wilson, Valerie, and William Darity Jr. 2022. "Understanding black-white disparities in labor market outcomes requires models that account for persistent discrimination and unequal bargaining power." Economic Policy Institute, Washington, DC.

GEORGE A. AKERLOF

University Professor,
Georgetown University

ROGER C. ALTMAN

Founder and Senior Chairman,
Evercore

KAREN L. ANDERSON

Senior Director of Policy,
Communications, and External Affairs,
Becker Friedman Institute for Research in
Economics, The University of Chicago

ALAN S. BLINDER

Gordon S. Rentschler Memorial Professor of
Economics and Public Affairs,
Princeton University;
Nonresident Senior Fellow,
The Brookings Institution

RAY DALIO

Founder, CIO Mentor, and
Member of the Bridgewater Board,
Bridgewater Associates

BRIAN DEESE

Former Director,
National Economic Council

STEVEN A. DENNING

Chairman Emeritus,
General Atlantic

BRIAN DEESE

Former Director,
National Economic Council

JOHN M. DEUTCH

Institute Professor,
Massachusetts Institute of Technology

WILLIAM C. DUDLEY

Senior Advisor, Griswold Center for Economic
Policy Studies, Princeton University

CHRISTOPHER EDLEY, JR.

Interim Dean, Berkeley School of Education;
Dean Emeritus, Berkeley Law School

BLAIR W. EFFRON

Partner,
Centerview Partners LLC

DOUGLAS W. ELMENDORF

Dean and Don K. Price Professor of
Public Policy,
Harvard Kennedy School

JUDY FEDER

Professor and Founding Dean,
McCourt School of Public Policy,
Georgetown University

MICHAEL FROMAN

President,
Council on Foreign Relations

JASON FURMAN

Aetna Professor of the Practice of
Economic Policy, Harvard University;
Senior Fellow, Peterson Institute for
International Economics;
Senior Counselor, The Hamilton Project

MARK T. GALLOGLY

Cofounder,
Three Cairns Group

TED GAYER

President,
Niskanen Center

TIMOTHY F. GEITHNER

Chairman, Warburg Pincus;
Senior Counselor, The Hamilton Project

ROBERT GREENSTEIN

Visiting Fellow, The Hamilton Project,
Economic Studies, The Brookings Institution;
Founder and President Emeritus,
Center on Budget and Policy Priorities

MICHAEL GREENSTONE

Milton Friedman Professor in
Economics and the College,
Director of the Becker Friedman Institute for
Research in Economics, and
Director, Energy Policy Institute,
University of Chicago

BEN HARRIS,

Vice President and Director,
Economic Studies, The Brookings Institution

GLENN H. HUTCHINS

Co-Chair, The Brookings Institution;
Chairman, North Island and
North Island Ventures

LAWRENCE F. KATZ

Elisabeth Allison Professor of Economics,
Harvard University

MELISSA S. KEARNEY

Director, Aspen Economic Strategy Group;
Neil Moskowitz Professor of Economics,
University of Maryland;
Nonresident Senior Fellow,
The Brookings Institution

EUGENE A. LUDWIG

27th Comptroller of the Currency;
Founder and CEO, Ludwig Advisors

LILI LYNTON

Founding Partner,
Boulud Restaurant Group

HOWARD S. MARKS

Co-Chairman,
Oaktree Capital Management, L.P.

KRISTON MCINTOSH

Deputy Chief Communications Officer,
American Civil Liberties Union

ERIC MINDICH

Founder,
Everblue Management

SUZANNE NORA JOHNSON

Co-Chair, The Brookings Institution; Former Vice
Chairman, Goldman Sachs Groups, Inc.

PETER ORSZAG

CEO, Financial Advisory,
Lazard Freres & Co LLC

PENNY PRITZKER

Chairman and Founder, PSP Partners;
38th Secretary of Commerce

MEEGHAN PRUNTY

Principal,
PE Strategic Partners

ROBERT D. REISCHAUER

Distinguished Institute Fellow and
President Emeritus,
Urban Institute

NANCY L. ROSE

Charles P. Kindleberger Professor of
Applied Economics,
Massachusetts Institute of Technology

DAVID M. RUBENSTEIN

Co-Founder and Co-Chairman,
The Carlyle Group

ROBERT E. RUBIN

Former U.S. Treasury Secretary;
Co-Chair Emeritus,
Council on Foreign Relations

LESLIE B. SAMUELS

Senior Counsel,
Cleary Gottlieb Steen and Hamilton LLP

DIANE WHITMORE SCHANZENBACH

Margaret Walker Alexander Professor,
Northwestern University; Associate Provost and
Senior Advisor to the President for Academic
Excellence, University of Florida; Nonresident
Senior Fellow, The Brookings Institution

RALPH L. SCHLOSSTEIN

Chairman Emeritus,
Evercore

ERIC SCHMIDT

Co-Founder, Schmidt Futures;
Former CEO and Chairman, Google

ERIC SCHWARTZ

Chairman and CEO,
76 West Holdings

THOMAS F. STEYER

Co-Executive Chair,
Galvanize Climate Solutions

JOSHUA L. STEINER

Partner, SSW Partners

MICHAEL R. STRAIN

Director of Economic Policy Studies and
Arthur F. Burns Scholar in Political Economy,
American Enterprise Institute

LAWRENCE H. SUMMERS

Charles W. Eliot University Professor,
Harvard University

ALLEN THORPE

Partner,
Hellman & Friedman

LAURA D'ANDREA TYSON

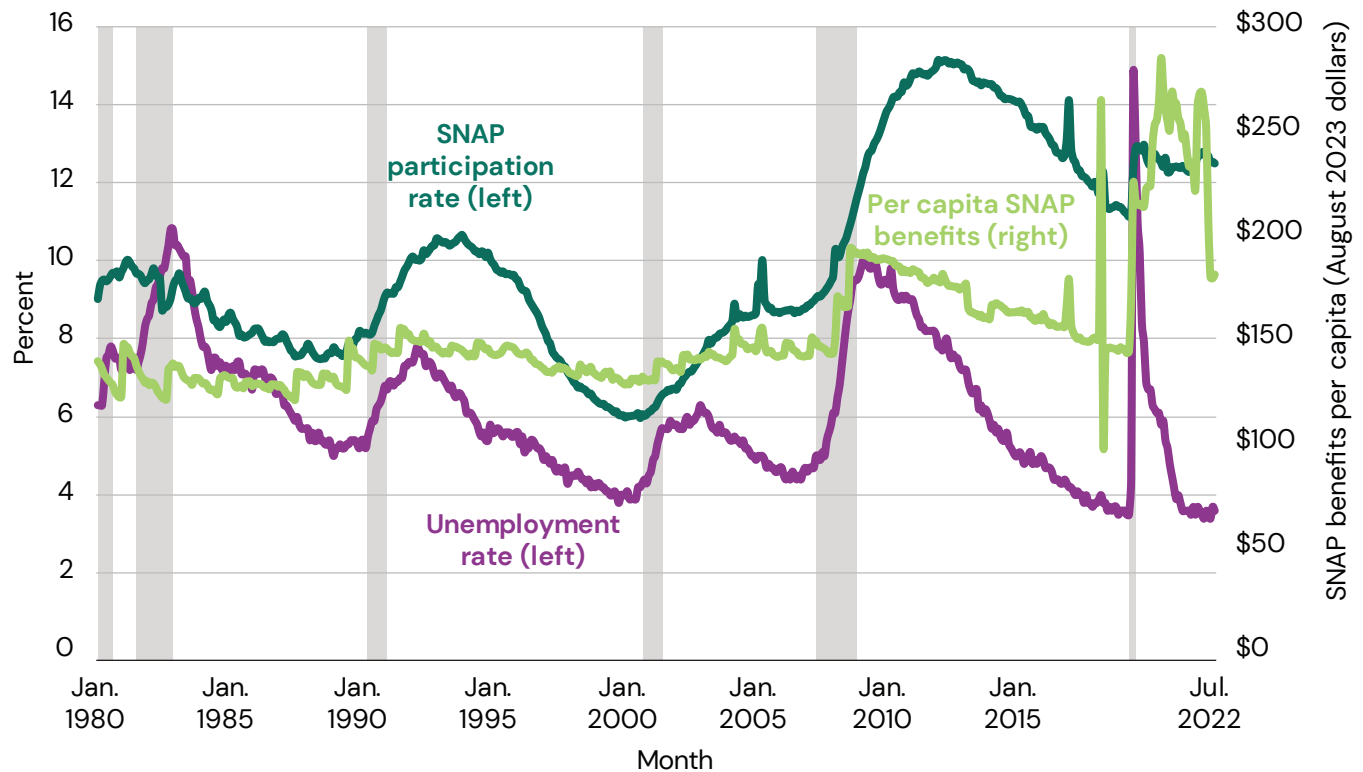
Distinguished Professor of the Graduate School,
University of California, Berkeley

WENDY EDELBERG

Director

Following welfare reform in 1996, the Supplemental Nutrition Assistance Program (SNAP; formerly the Food Stamp Program) became the only truly universal means-tested safety net program in the U.S. In that same year work requirements in SNAP expanded, limiting the efficacy of the program to support all low-income households. In this FAQ, we explain SNAP work requirements and offer key takeaways to help guide an understanding of work requirement policy, the people subject to work requirements, and features of the labor market in which these SNAP participants work based on rigorous evidence. We believe that the evidence supports ending or severely limiting ABAWD work requirements..

Unemployment, SNAP participation, and per capita SNAP benefits, 1980 through June 2023



Source: USDA n.d.; BLS n.d.; authors' calculations.

Note: Shaded areas denote recessions. Per capita SNAP benefits are inflation-adjusted using the CPI-U to 2023 dollars. The large spike and sequential decline in SNAP benefits around January 2019 reflects the 35-day government shutdown, in which most of the February 2019 SNAP benefits were issued in January of 2019 in order for recipients to receive their benefits in a timely manner. Therefore, January 2019 benefits appear much higher than those of the previous months and February's benefits appear much lower.

