



Association of Arizona Food Banks

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Supplemental Nutrition Assistance Program (SNAP) Issue Brief Time Limits, Work Requirements and Able Bodied Adults without Dependents

As a condition of receiving Supplemental Nutrition Assistance Program (SNAP-formerly known as Food Stamps) benefits, individuals between the ages of 18-49 without children are required to work at least part time or participate in job training or workfare opportunities or have their benefits limited to 3 months in a three year period. These individuals are referred as Able Bodied Adults Without Dependents (ABAWDs). During the recession and the few years that have followed, states were able to waive this requirement due to high unemployment rates and lack of available jobs. However, as the economy has recovered, fewer communities will qualify for these waivers. In Arizona, Maricopa County will lose its waiver in January 2016. It is anticipated that as many as 40,000 individuals will be subject to the time limits and could lose their SNAP benefits as this time limit is reached. Reimplementing the rules to comply with this policy change will be met with many issues and challenges for both clients and policymakers.

Administrative Challenges

The state of Arizona, like many states, has been exempt from the ABAWD requirements since 2009. As a result, many clients and eligibility staff have never had to create and comply with rules related to employment in the SNAP. It is expected this change in policy will result in confusion for clients as well as eligibility staff and community partners. First, the Department of Economic Security (DES) will need to determine who is subject to or exempt from the work requirement. Some of the factors that would qualify an individual as an ABAWD or provide a work requirement exemption include:

- Age (participant must be older than 18 and younger than 50)
- Residency with a child (participant must not reside in a household with a minor child)
- Individuals with disabilities
- Individuals participating in drug/alcohol rehabilitation programs
- Pregnant
- Currently employed
- At least a part time student
- Receiving unemployment insurance

After determining who qualifies as an ABAWD, the state will notify the client about their time limited requirement in SNAP. These notifications are expected to be mailed to clients in early December 2015. After receiving the notice, ABAWDs will be required to respond and regularly submit documentation of their compliance with the mandatory work requirement. To comply, the participant must be working 80 hours in a month, complying with the Supplemental Nutrition Assistance Employment and Training (SNA E&T) Program for 20 or more hours per week averaged monthly or in an employment and training program under the Workforce Innovation and Opportunity Act (WIOA) or the Trade Adjustment Act (TAA). DES Division of

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Employment and Rehabilitative Services (DERS) will be responsible for determining the credibility of this compliance and notify the DES Division of Benefits and Medical Eligibility (DBME) so that SNAP benefits can continue.

Again, it is likely that administrative challenges will exist throughout the notification, compliance, documentation and eligibility processes. Some points of considerable concern for advocates include:

- How will the state ensure that eligible people are not terminated, especially those who are physically or mentally unfit for employment? How will DES reinstate individuals who have been improperly terminated and credit them back the benefits?
- How will eligibility staff understand and apply the rules related to the time limits consistently and accurately?
- How will employment staff adequately and appropriately assess each individual for work readiness?
- How will employment staff understand and count allowable employment activities? How will they track the required number of hours?
- What changes will be necessary to forms, including applications and notices?
- How will these new rules be communicated to clients in a way they understand and are able to respond?

Resources

The SNAP Employment and Training Program (SNA E & T) is provided to help SNAP participants comply with work requirements and gain the skills necessary to succeed in the workforce. However in Arizona it has been underutilized. From October 2014 to March 2015, Arizona SNA E & T had nearly 600 participants and had an average hourly wage of \$9.65. In FFY2016, DES budgeted for 49 individuals to provide assessment, case management and job search services to clients. Arizona now intends to restructure its program to expand services and utilize three community partners in Maricopa County to assist clients with employment services. However, it is likely that these partners will never assess an ABAWD as the referral process for new clients is still being determined.

Through a phased Personal Accountability Pilot, the Maricopa County Human Services Department, UMOM New Day Centers and Father Matters will “implement strategies designed to enhance the capacity of Arizonans to achieve their highest functioning self and reduce their dependency on publically supported services.” SNAP recipients referred to the SNA E & T program will receive an employment assessment, develop a career plan, case management and services related to job readiness and education and training. It is expected that these contracts will add an additional 20 staff to assist clients with employment readiness. The SNA E & T program does not currently provide child care services.

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Economic Factors

DES acknowledges the challenge of moving nearly 40,000 individuals into employment opportunities in a considerably compressed timeframe. The state is ill prepared to manage the volume of clients expected to comply with work requirements or be subject to SNAP benefit termination. Other states have reported significant barriers to employment for ABAWDs including a lack of employment history, lack of transportation, substance abuse, mental illness and felony convictions. In Ohio, nearly 33% of clients reported a physical or mental health limitation, more than 30% have no high school diploma or GED, and 34% have felony convictions.

The state of Arizona also has an unemployment rate of 6.1%, the 6th highest in the country. In October 2015, Arizona gained 33,800 nonfarm jobs. Many of these jobs came from the trade, transportation and utilities, education and health services and professional and business services. While Arizona's economy is slowly recovering, placing 40,000 individuals into the workforce in a short period will be a huge undertaking. With a combined staff of less than 70, the state and community partners will need to work quickly and comprehensively to ensure individuals do not lose access to nutritional benefits because there are no jobs available.

Additionally, the economy will suffer because these individuals will no longer have benefits to spend in grocery stores and other food retailers. An estimated \$3.6 million will be taken out of the economy that could further support employment in supermarkets.

Recommendations and Next Steps

As the economy slowly recovers, we know that SNAP caseloads will continue to decrease. However, shoving individuals into an economy that does not have a immediately have a place for them or cutting nutritional benefits as individuals are looking for work in order to speed up this caseload decrease is short sighted. These individuals will seek assistance from food banks and pantries, family members, churches and other community providers to meet this basic need. This network is also not prepared for this volume of need, especially considering the already high levels of service.

We encourage advocates to educate themselves about ABAWDs and the SNAP time limits. We urge social service organizations and other faith and community partners to understand the issue so they can communicate and help clients to both keep benefits and reinstate them.

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Some critical next steps include:

- 1) Increase communication. We need to prepare clients and those providers that work directly with them about the notification they will be receiving from DES. See accompanying FAQs for clients.
- 2) Dedicate additional DES and community partner staff to assessment, case management and placement. A total of approximately 70 staff to complete individual employability assessment, case management and job support is not enough to ensure successful job placement and retention for 40,000 individuals. That is an average caseload of 571 and assumes that all would be dedicated to this population.
- 3) Expand SNA E and T partners throughout Maricopa county and other metropolitan communities. The federal government will support these partners 50% and we should use those funds to help more individuals move to self-sufficiency.
- 4) Prioritize WIOA funds for education, training and support services to ensure a seamless delivery of services.
- 5) Create partnerships with the Arizona Department of Corrections to address the concerns of employers in regards to future employment of felons. Prepare individuals entering the workforce after a period of incarceration for the challenges in the workplace.
- 6) Increase funding to food banks to be able to better meet the increased need with the loss of SNAP benefits to ABAWDs. Since the recession, demand has remained consistently high and food banks and their partners are not equipped to handle even more need for emergency food.
- 7) Increase support for transportation and child care to help with immediate job placement. Job supports like these are needed to ensure individuals can attach and stay connected with employment.
- 8) Increase analysis of the needs of this population and how Arizona's economy can help ABAWD clients succeed. More research should be done to understand how the loss of SNAP benefits impacted client health and well being as well as impacts to the economy.

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