



SNAP: Requirements for ABAWDs: Summary of Proposed Changes

- [Proposed Rule](#) released by USDA Food & Nutrition Service on **Feb. 2, 2019**
- [Public Comments](#) due by **April 2, 2019**

Background

Since the 1996 Welfare Reform Act, federal law requires limited SNAP eligibility to just 3 months in 3 years for able-bodied adults without dependents (ABAWDs), unless they work or participate in a state-qualified job-training program for an average of 80 hours/month.

Differences between current rules and changes proposed by the USDA

There are many nuanced changes proposed in the rulemaking process, but the major concerns are summarized below. In current statute, states have discretion to waive these work requirements through two pathways: ABAWD Time-Limit Waivers and Individual Exemptions.

CURRENT RULE	PROPOSED CHANGE
<ul style="list-style-type: none"> • States can submit an application to the USDA to waive the SNAP time limit for ABAWDs in areas with high unemployment (10% or higher), or areas with “insufficient jobs for this population.” They must submit documentation. 	<p>USDA will restrict access to these waivers in several ways: increased documentation required; changing the unemployment threshold to the past two years; waiting until extended UI benefits are triggered; etc.</p>
<ul style="list-style-type: none"> • States get a 15% threshold for individual exemptions, which they can choose to use to exempt certain individuals or groups from ABAWD time limits. States have used this to exempt: domestic violence victims, homeless individuals, people who work 18 hours/week instead of 20 hours/week, etc. • States can carry over unused exemptions. 	<p>USDA will restrict the number of individual exemptions that states have to 12%.</p> <p>USDA will prohibit states from carrying over unused exemptions to future years.</p>

How Many People Would Be Affected?

- **Federal:** 755,000 people cut-off (USDA’s own estimate), but more at risk
- **Arizona:** Up to 50,000 ABAWDs statewide, but those in Maricopa, Pima, and Yavapai counties are already subject to time limits; rural and tribal areas will be disproportionately affected if this rule were to go into effect because there are (a) few jobs for people with significant barriers to employment, and (b) few if any accessible state-approved job-training programs

Who Are “ABAWDs,” really?

- 70% live below half of the poverty line
- Significant barriers to work: former foster youth, formerly incarcerated individuals, veterans, people with limited transportation, people without a high school diploma or GED
- Gender: 55% male, 45% female
- Age: 18–29 years old (47%), 30–39 years old (22%), 40–49 years old (31%)
- Race/Ethnicity: 48% white, 35% black, 13% Hispanic