

Report Touting Success of Florida’s SNAP Work Requirements Distorts Harmful Impact on Residents and State Economy

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Introduction

A recent report¹ issued by the Foundation for Government Accountability claims to examine the impact of Supplemental Nutrition Assistance Program (SNAP) work requirements in Florida. In 2016, state lawmakers rolled out the requirements state-wide for the first time since the Great Recession.² Under these rules, SNAP recipients in Florida between the ages of 18 and 49 must work, or participate in a work or training program, for at least 80 hours every month. People with disabilities, or those who take care of a child or an incapacitated person, are exempt from the requirement. SNAP refers to those who are not exempt as “able-bodied adults without dependents” or ABAWDs. If ABAWDs in Florida fail to comply with SNAP work requirements without good cause, their entire food assistance is terminated as a work sanction.

There are several major problems with the report’s analysis:

- **The report fails to acknowledge that many SNAP recipients who are subject to work requirements already work or are likely to find jobs in the near future and, as a result, their work rates and wages would likely have risen without work requirements.** Although the report attributes work rates to the requirements, Floridians receiving SNAP already have strong work histories. In fact, in the Sunshine State, SNAP is a program that supports and fosters work. Fourteen percent of low-wage workers in Florida rely on SNAP to put food on the table. Getting a job, however, does not necessarily mean that low-income workers have *full-time* jobs, and even if they do, having SNAP is often the difference between eating a meal and going hungry.
- **The report fails to consider the hardship on Floridians who were thrown off the SNAP program as a work sanction.** The authors praise SNAP work requirements as transforming the lives of struggling Floridians by moving them into the workforce. However, in reality, although the imposition of work requirements on SNAP recipients has dramatically altered the lives of hundreds of thousands of Floridians, the change has been anything but good. The vast majority of ABAWDs who were kicked off SNAP in 2016 did not leave because they found work or no longer need help — they left SNAP because they were forced off as a work sanction.
- **The report does not acknowledge the reasons why ABAWDs in the Sunshine State may have more difficulty finding stable, full-time employment in today’s job market.** Because of their unique

demographics, including race and education levels, ABAWDs have a higher unemployment rate than that of Florida's general population. Despite their diligent efforts to get jobs, many ABAWDs face difficulties in finding stable, full-time employment that others in the state do not encounter.

Evidence suggests that sanctions are not the reason why SNAP recipients work and that a better economy has more of an impact on low-income employment than do work requirements. Typically, although ABAWDs in Florida may face greater obstacles to employment than others, many already work, at least part-time, or are likely to find jobs in the near future. For these SNAP recipients, work sanctions do nothing other than inflict hardship during already difficult times or in the face of challenges to regaining employment.

Investment in education, training and work supports for Floridians receiving SNAP, not work sanctions, is the key to reducing long-term need for food assistance and fostering success in today's labor market.

What's Wrong with the Report's Methodology?

- The report does not use a control group to compare the outcomes of SNAP recipients subject to work requirements with those who are not. It makes claims that can only be identified by isolating the impacts of work requirements from what would have happened without them. As a result, the report draws conclusions about the impact of work requirements on Florida's economy and the impact of those requirements on the recipients themselves that are unwarranted and not a true picture of cause and effect.
- The report is devoid of any information about the fate of the hundreds of thousands of ABAWDs in Florida who have left SNAP involuntarily as a work sanction since January 2016. Omitted is any look at their health and well-being after being dumped from a critical nutrition program without any means to put food on the table, or whether they were able to find jobs.
- The report chides researchers who cite statistical data about the demographics of ABAWDs as condescending critics who oppose work requirements. Yet the report does not offer any evidence that Floridians subject to SNAP work requirements have skills and education levels commensurate with either Floridians not receiving SNAP or SNAP recipients not subjected to work requirements. Contrary to the report, the overwhelming body of data suggests that ABAWDs, as a group, have lower education and skills levels.
- The report refers to the largest tracking study of its kind implemented by the Department of Economic Opportunity (DEO) to support its claims about the work outcomes of 470,000 former welfare recipients. Yet, DEO insists that it has conducted no such study and, instead, only has raw data that has not been released publicly.
- The report does not include any data on actual wages earned by the former recipients in the higher-wage sectors it claims they moved into. Rather, the report cites the average statewide hourly wages of persons in those industries and implies that the former recipients work full time.

The report stresses that the number of ABAWDs receiving SNAP in Florida dropped dramatically during the first two years after work requirements were reinstated. While it's true that SNAP work requirements have cycled hundreds of thousands of Floridians off SNAP, it is not true — nor does the report show — that those Floridians left SNAP because work requirements galvanized them to find jobs. In truth, the precipitous decline in SNAP enrollment occurred because Floridians were deemed non-compliant with work requirements, and they were subsequently kicked off food assistance. This is despite the fact that many have part-time jobs, are temporarily unemployed, or face significant barriers to work.

Some ABAWDs are ready and able to work and possess the skills that potential employers are looking for to fill job openings. However, according to the Florida Legislature's Office of Program Policy Analysis & Government Accountability (OPPAGA), ABAWDs who are sanctioned over SNAP work requirements often have significant barriers keeping them from being able to comply.³ Although the most common barrier reported by ABAWDs in Florida is lack of transportation,⁴ the ability of ABAWDs in the Sunshine State to work is also hindered by obstacles such as health issues, homelessness, education levels that make it difficult for them to qualify for a job, and criminal histories that worry potential employers.⁵ On top of that, many ABAWDs in Florida who have one barrier to work are likely to have additional barriers as well.⁶

In 2016 alone, according to the state's own data, almost 320,768 Floridians⁷ lost their food assistance as a work sanction. The state makes no claim that any of these individuals found jobs because of the work requirement. This is no anomaly, as OPPAGA anticipates that approximately 77 percent of the 152,098 persons who will be subjected to work requirements in 2019 will not participate in the program.⁸ As a consequence, many of those persons will likely lose their SNAP as a sanction as well. Yet the report makes no mention of the hardships faced by Floridians who lose their SNAP as a work sanction. The report does not acknowledge the household's increased hunger. Nor does the report look at the sanctioned household's inability to afford groceries and the impact of loss of SNAP on their health.

The report claims that leaving SNAP makes people better off. But the authors provide no data supporting this claim nor do they address the likely possibility that taking away SNAP does nothing to help recipients find jobs that lift them out of poverty. In addition, the report fails to look at the number of working ABAWDs who were sanctioned off SNAP because of unpredictable work schedules that were beyond their control. Also missing is any mention of the one common thread among every person leaving SNAP — each lost the benefits they need to purchase an adequate diet. Instead, the report checks off the box next to every recipient forced out of the program as a success that should be heralded, regardless of the human consequences.

Floridians who lose their SNAP as a punishment for not having an 80-hour-a-month job or job training are deprived of their means to afford groceries. Charities and other nonprofits, who are barely able to meet the needs of struggling Floridians as it is, are ill-equipped to take up the slack. As the same time, the entire State of Florida suffers enormous financial loss. In 2016 alone, Florida lost more than \$122 million after terminating SNAP benefits as a result of work sanctions.⁹ This \$122 million, which would have been spent in communities throughout the Sunshine State, is 100 percent federally funded.

ABAWDs Are Motivated to Work Regardless of Requirements

The authors of the report question why Floridians continue to receive post-Recession food assistance and credit work requirements as the stimulus that propels hundreds of thousands of Floridians into the labor force.

But the real picture looks very different from the myth that is perpetuated in the report.

Most adults without disabilities who receive SNAP in Florida already work, or would work in the near future, even without work requirements. Seventy-nine percent of families on SNAP in Florida have at least one household member who worked in the past 12 months.¹⁰

Still, ABAWDs, like other working people struggling on low income, are frequently in part-time jobs. According to a USDA-funded study of the SNAP Employment and Training Program (SNAP E&T), although more than 86 percent of ABAWDs have worked, they are likely to have jobs that do not provide full-time employment. Indeed, more than 45 percent of SNAP E&T participants who are working have part-time jobs.¹¹ And, although they want to work full-time, low-income workers are often unable to find stable, full-time employment due to unpredictable schedules, a slack in labor markets, family obligations, or medical problems.¹² In fact, it is lost income, often due to a layoff or decrease in work hours, that drives people to turn to SNAP.¹³

Nothing in the report shows that ABAWDs earned any more than they would have earned absent work requirements. Nor does the report include any data on actual wages earned by the former recipients in the higher-wage sectors it says they moved into. Instead, the report touts the average statewide hourly wages of persons in those industries. The report does not even say what the true salaries are of the three Floridians it claims have succeeded due to work requirements, instead reporting the average wage of the industry where they found jobs. Suggesting that these three Floridians — or any ABAWD for that matter — earn the average wage for workers in a particular industry is misleading.

“Indeed, SNAP is a critical support that helps about 1.27 million low-wage Floridians who already work get by each month.”

It is no revelation that households commonly apply for SNAP when their income drops due to the loss of earnings, nor is it surprising that the number of ABAWDs forced to turn to SNAP to put food on the table grew during the Great Recession. That is what SNAP is there for, by design; the program functions as a bridge between jobs. Floridians turn to SNAP only when they need it, often in desperation, and leave the program when they do not. Although some people need help for longer periods of time than others, that length of time depends on individual circumstances. For example, elderly persons who live alone stay on SNAP the longest. They have few events in their life that would alter their continued need for help.¹⁴ But what about ABAWDs? In a USDA study of how long persons stay on SNAP, ABAWDs are one of the groups spending the least amount of time — a median of 8 months — on the program.¹⁵

For ABAWDs, SNAP is not a lifestyle; it is a lifeline. Work requirements, and the inevitable sanctions imposed on those who cannot find 80-hour-a-month jobs, only make it harder for persons who are working or looking for work to keep their heads above water. Indeed, SNAP is a critical support that helps about 1.27 million low-wage Floridians who already work get by each month.¹⁶ As it is, as many as 25 percent of working people with low income *do not* get SNAP in Florida, even though they are eligible.¹⁷ Food assistance is a crucial part of the safety net, and Florida should do better at supporting the work of low-income persons through its SNAP program.

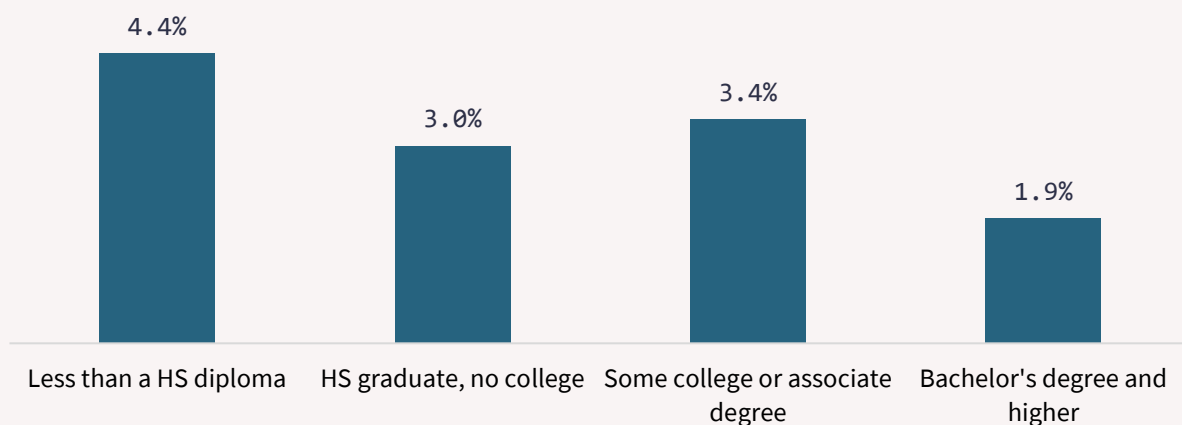
ABAWDs Face Higher Unemployment Rates due to Demographic Differences

The impact of the Great Recession, although technically over, has been long lasting in the Sunshine State.¹⁸ While job prospects have improved, no one continues to feel the damaging effects on employment prospects as strongly as ABAWDs. The fact that Florida’s economy is recovering does not translate into enough jobs for ABAWDs. Because of unique demographics, the unemployment rate for this group is higher than the unemployment rate for Florida’s general population.

Racial inequality in employment puts ABAWDs on an uneven playing field for finding jobs. Fifty-four percent of Florida residents are white; 16.9 percent are African American, and 25.6 percent are Hispanic.¹⁹ In contrast, 35 percent of ABAWDs are African American and 13 percent are Hispanic.²⁰ African Americans and Hispanics in Florida face higher unemployment rates than their white counterparts. Indeed, the unemployment rate for African Americans is almost double.²¹

FIGURE 1. UNEMPLOYMENT RATE HIGHER FOR PEOPLE WITHOUT HS DIPLOMA

12-month average ending May 2019 for Florida



Source: Florida DEO Data Release Q&A, May 2019 (see endnotes)

CASE STUDIES: THREE FLORIDIANS WHOSE STORIES PAINT A TRUE PICTURE OF SNAP WORK REQUIREMENTS

wide in Florida in 2016, John was a 20-year-old suffering from cystic fibrosis and living with his mother in Jacksonville. Because of his disability, he has difficulty breathing and must undergo a regime of medication therapies every day to keep his lungs clear and prevent infection. Even though his disability prevents him from working, he lost his SNAP as a work sanction.

Mike is a homeless 36-year-old United States Army veteran from Miami who receives VA service-connected disability benefits. Mike works as an Uber driver, although he is not always able to meet the 80-hour-per-month SNAP work requirement. In a month that he was unable to work 80 hours, DCF threatened to cut off his entire SNAP as a work sanction.

Jack lives in the panhandle and has always held down a regular job. But after his elderly grandfather became too ill to live by himself, Jack agreed to move in with his grandfather to care for him full-time. Even though he explained the situation to DCF, Jack's SNAP was terminated as a work sanction.

Florida's workforce development boards, which are tasked by the state with providing job services to SNAP recipients, also encounter ABAWDs with education levels that make it difficult for them to find work.²² This observation is borne out by available data: the Department of Economic Opportunity reports that 29 percent of ABAWDs in Florida lack a high school diploma or GED.²³ Lack of education is a barrier for ABAWDs when going toe-to-toe with other job seekers, particularly the 41 percent of Florida's population that has a 2-year degree or higher.²⁴ The seasonally adjusted unemployment rate of persons without a high school diploma (about 30 percent of ABAWDs) in Florida is 4.4 percent²⁵ (see Fig. 1).

Expecting ABAWDs with no more than a high school diploma to be competitive in today's workforce is unrealistic. Upgrading skills of ABAWDs will make them more likely to find and keep stable employment with earnings that pay a living wage and offer career advancement.²⁶ For the top 15 occupations by vacancy in Florida, almost 30 percent of jobs require at least a high school education and more than 35 percent have a certificate or license requirement.²⁷ Further, approximately 40 percent of the vacancies require at least 1 year of experience.²⁸ Even vacancies reported for food preparation and sales-related occupations²⁹ have skills gaps such as information technology (IT), math,

communications, leadership and problem-solving.³⁰ Further, according to a report by the American Institute for Research on economic outcomes based on education in the Sunshine State, the higher the education level, the less likely Floridians are to need public assistance in the future.³¹

The report claims that Florida offers vocational training and other services to help able-bodied adults build skills they need for employment.³² Yet, in 2019, the Sunshine State estimates that only 22.3 percent³³ of ABAWDs will be provided any services at all, and of those, less than 12 percent³⁴ will receive education or training. As a result, Florida misses out on an opportunity to provide education, training, and important supports to assist SNAP recipients in finding and keeping jobs.

Conclusion

There is one thing in the report that everyone can agree on: ABAWDs have significant potential to succeed in the workforce if given a fair chance. But to have that opportunity, many ABAWDs need education, training and support as well as access to food.

The report not only is devoid of proof that work requirements change lives for the better but also fails to account for the hardships caused by the loss of benefits. Although the report attributes jobs found by SNAP recipients to imposition of work requirements, many of those recipients would have found work anyway, particularly as unemployment rates were dropping. The report fails to account for research³⁵ showing that working-age individuals on SNAP work while receiving assistance or within a year of receiving it. Even so, nearly all the ABAWDs whose SNAP was terminated after work requirements were imposed left because they were sanctioned, not because they went into the labor market or no longer needed help to make ends meet. In 2016 alone, as many as 320,768 or more ABAWDs lost their assistance as a work sanction, not because they found employment.³⁶

This is not a problem without a solution. Florida should turn its attention to building a better SNAP E&T program, including providing much-needed educational services and work supports to SNAP recipients. Instead of pulling the sanction trigger, the Sunshine State should ensure that no Floridian loses food assistance if they are exempt or trying to comply. Until then, for the vast majority of ABAWDs in Florida, SNAP work requirements are nothing more than a legal green-light to cut off the food assistance of Floridians who are barely keeping their heads above water.

¹ Horton, N. and Ingram, J. (2019, March 4). Foundation for Government Accountability. *Commonsense Welfare has Transformed Floridians' Lives*. Retrieved from <https://thefga.org/research/commonsense-welfare-reform-has-transformed-floridians-lives/>. See also Germanis, P. (2017, Aug. 31). "The Truth About Welfare Reform" won't be Found at the Foundation for Government Accountability: A Response to Jonathan Ingram. Retrieved from: <https://mlwiseman.com/wp-content/uploads/2016/05/Ingram.pdf>; Rosenbaum, D. and Bolen, E. B. Center on Budget and Policy Priorities. (2016, Dec. 14). *SNAP Reports Present Misleading Findings on Impact of Three-Month Time Limit*. Retrieved from <https://www.cbpp.org/research/food-assistance/snap-reports-present-misleading-findings-on-impact-of-three-month-time>

² Work requirements are part of the SNAP Employment and Training Program (SNAP E&T). 7 C.F.R. § 273.7. The report conflates SNAP work requirements and SNAP ABAWD time limits, which are, by law, two different policies altogether. Compare 7 C.F.R. § 273.7 (Work provisions) with 7 C.F.R. § 273.24 (Time limit for able-bodied adults). The distinction between the two is important. For work requirements, the state has a duty to help SNAP recipients to comply by, among other things, assisting with support services that recipients need in order to participate. For time limits, the state has no such duty. In addition, a state that mandates participation in an Employment and Training program is required to provide a spot in a training program for each individual. In comparison, for time limits, states have no obligation, so even recipients who are either actively looking for, but unable to find, a job, or working but not meeting the required 80 hours a month, will lose their SNAP after 3 months.

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- ³ The Florida Legislature. Office of Program Policy Analysis and Government Accountability (OPPAGA). (2018, Jan. 8). *Mandatory Work Requirements for Recipients of the Food Assistance and Cash Assistance Programs*. Retrieved from https://public.medicaid.gov/gf2.ti/af/328098/47225/PDF/-/OPPAGA_SNAP_TANF_FINAL_003.pdf. If everything worked as it is supposed to, SNAP recipients who have health problems or other good cause should either be exempt or temporarily excused from work requirements. Nonetheless, many SNAP recipients end up losing their assistance as a work sanction even though significant obstacles, such health problems or lack of transportation, keep them from being able to follow through.
- ⁴ OPPAGA, *op. cit.*, pp. 20, 21. Although ABAWDS are eligible to receive reimbursement of up to \$25 for transportation expenses to participate in SNAP E&T, OPPAGA reports that lack of cash to pay for transportation upfront creates an insurmountable barrier to compliance with work requirements for SNAP recipients.
- ⁵ The ABAWDS whose barriers kept them from progressing to or completing assessment are not part of the study. OPPAGA, *op. cit.*, pp. 13, 21.
- ⁶ OPPAGA, *op. cit.*, p.20.
- ⁷ OPPAGA, *op. cit.*, p.13. However, data obtained from DCF in a March 1, 2017, Public Records Act request puts the number of ABAWDS who received a work sanction in Florida from January 1, 2016, until January 31, 2017, at more than half a million.
- ⁸ Florida Department of Economic Opportunity. (2018, Sept. 27). *SNAP Employment and Training State Plan: Federal Fiscal Year 2019*. Retrieved from [http://www.floridajobs.org/docs/default-source/lwdb-resources/lwdb-grants-management/supplemental-nutrition-assistance-program-\(snap\)---\(fset\)/2018-snap/ffy-2019-snap-et-state-plan.pdf?sfvrsn=2](http://www.floridajobs.org/docs/default-source/lwdb-resources/lwdb-grants-management/supplemental-nutrition-assistance-program-(snap)---(fset)/2018-snap/ffy-2019-snap-et-state-plan.pdf?sfvrsn=2). Of the 152,098 ABAWDS subject to work requirements, only 35,228 will end up participating in SNAP E&T.
- ⁹ Florida Department of Children and Families. (2016, Dec. 13). *Response to Public Record Request*.
- ¹⁰ Food Research & Action Center. (2018, Feb). *Supplemental Nutrition Assistance Program (SNAP): Florida Facts*. Retrieved from <http://www.frac.org/wp-content/uploads/snap-facts-fl.pdf>
- ¹¹ Rowe, G., Brown, E. and Estes, B. Mathematica Policy Research. (2017, Oct. 31). *SNAP Employment and Training (E&T) Characteristics Study: Final report*. Retrieved from <https://www.mathematica-mpr.com/our-publications-and-findings/publications/snap-employment-and-training-e-t-characteristics-study-final-report>.
- ¹² Stevens, A. Econofact. *Employment and Poverty*. (2018, Jan 7). Retrieved from <https://econofact.org/employment-and-poverty>; Bauer, L. and Schanzenbach, D. The Brookings Institution. (2018, Aug. 9). *Who loses SNAP benefits if additional work requirements are imposed? Workers*. Retrieved from <https://www.brookings.edu/blog/up-front/2018/08/09/who-loses-snap-benefits-if-additional-work-requirements-are-imposed-workers/>
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- ¹⁴ United States Department of Agriculture. Food and Nutrition Services. (2014, Dec.) *Dynamics of Supplemental Nutrition Assistance Program Participation from 2008 to 2012*. Retrieved from <https://fns-prod.azureedge.net/sites/default/files/ops/Dynamics2008-2012.pdf>
- ¹⁵ Dynamics of Supplemental Nutrition Assistance Program Participation, *op. cit.* p. 69.
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- ²² OPPAGA, *op. cit.*, pp. 20.
- ²³ Department of Economic Opportunity. (2018, March 30). *SNAP E&T Annual report – Fiscal Year 2017*.
- ²⁴ Florida College Access. (2019). *Degree Attainment Profile*. Retrieved from <http://floridacollegeaccess.org/wp-content/uploads/2019/02/Florida2019Feb.pdf>
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- ²⁶ Florida Department of Economic Opportunity. CareerSource Florida. (2018). *Skills Gap and Job Vacancy Survey: Statewide 2018*. Retrieved from http://lmsresources.labormarketinfo.com/skills_gap/skills_gap_report.pdf
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- ²⁸ DEO, *Gap and Job Vacancy Data., op.cit.*
- ²⁹ Rowe, Brown, and Estes, *op. cit.*, p. 24. Sales-related and food preparation occupations are the top two occupations reported by E&T participants.
- ³⁰ DEO, *Skills Gap and Job Vacancy Survey, op. cit.* In all, 62,941 of the 247,399 estimated vacancies reported by Florida employers were reported to have skills gaps.
- ³¹ American Institute for Research. *Measuring the Economic Success of Florida’s Graduates: Economic Security report 2018*. Retrieved from <http://www.floridajobs.org/docs/default-source/office-of-workforce-services/state-program-reports/2019-state-program-reports/florida-economic-security-report-final-01-10-2019.pdf?sfvrsn=0>
- ³² Horton and Ingram, *op. cit.*, p. 4.
- ³³ DEO, *SNAP Employment and Training State Plan, op. cit.*, pp. 18-25.
- ³⁴ DEO, *SNAP Employment and Training State Plan, op. cit.*, pp. 18-25. Of the 152,098 ABAWDS who will be subject to work requirements in 2019, 16,548 will be in Basic Education, 696 will be in Vocational Training, and 432 will be in a WIOA Education Component (total: 17,676 or under 12 percent).
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- ³⁶ OPPAGA, *op. cit.*, pp. 1-31.