

Perceptions of SNAP's Mandatory Work Provisions on Adults Without Dependents

A Summary of Findings from Interviews with Stakeholders and Listening Sessions with ABAWDs

Introduction

In 2009, the United States Department of Agriculture Food and Nutrition Services (FNS) offered states an opportunity to waive mandatory work provisions for able-bodied adults without dependents (ABAWDs). This waiver, which set aside employment and training requirements as a condition of receiving Supplemental Nutrition Assistance Program (SNAP) benefits (previously known as “food stamps”), was in response to the nationwide recession and high unemployment rates experienced across the country. Four years later, on November 1, 2013, due to an improved economy and lower unemployment rate in Minnesota, the ABAWD waiver expired. (The reinstatement of mandatory work provisions was pushed back one month – from October 1, 2013 – due to the federal government shutdown.)

An ABAWD is an able-bodied adult without dependents. ABAWD eligibility for SNAP is limited to 3 months in a 36-month period (considered the 2-month time limit) unless the individual meets the ABAWD work requirements. The 3-month time limit does not apply to individuals who are: 1) under 18 or 50 years of age or over; 2) medically certified as physically or mentally unfit to employment; 3) responsible for a dependent child or residing in a household where a household member is under age 18; 4) exempt from SNAP work requirements; or 5) pregnant. All other SNAP participants are considered ABAWDs.

To help understand the impact of the waiver ending, the Minnesota Department of Human Services (DHS), with funding from Hunger-Free MN, asked Wilder Research to gather feedback from community experts who are familiar with SNAP. In total, Wilder spoke with 10 stakeholders by telephone – eight interviews were conducted, but, in one case, two additional staff members joined the call. Stakeholders included attorneys, outreach and eligibility workers, those who worked in SNAP employment and training, and DHS division directors. Conversations ranged from 15 to 30 minutes. In addition to gathering this feedback, Wilder also analyzed data collected by DHS staff from listening sessions with homeless single adults, which were conducted over the summer of 2014.

The report below contains a brief overview of the work provisions reinstatement, the process used to communicate the policy change, a summary of feedback from the phone conversations with stakeholders, a summary of the data Wilder received from DHS, and issues to consider in moving forward. This report is not intended to be a comprehensive review of the impact of mandatory work provisions on ABAWDs. Rather, it is meant as a snapshot analyzing the views of several stakeholders and homeless adults who have important insights to share.

Overview of work provisions reinstatement

As stated previously, mandatory work provisions for ABAWDs, which had been waived in 2009, were reinstated by the federal government in 2013 due to an improved economy.

As of November 1, 2013, ABAWDs were required to participate in SNAP Employment and Training activities for at least 80 hours per month or receive SNAP benefits for no more than three months in a 36 month time period, unless exempt.

Effective as of October 1, 2014, Minnesota asked FNS to waive ABAWD work provisions for two counties and eight tribal reservations based on local employment data; those counties are Clearwater and Kanabec and the reservations are Bois Forte, Fond du Lac, Grand Portage, Leech Lake, Lower Sioux, Mille Lacs, Red Lake, and Shakopee Mdewakanton. When the mandatory work provisions were in effect prior to 2009, Minnesota had also exempted some counties and Indian reservations due to poor local employment conditions.

Process used to communicate the policy change

In preparation for the changes, DHS issued a bulletin on August 14, 2013 to county eligibility workers, supervisors, directors, Employment Service providers, and tribal staff. The bulletin – titled “Reinstatement of the Work Provisions for Able-Bodied Adults Without Dependents (ABAWDs) for the Supplemental Nutrition Assistance Program (SNAP)” – described the

reasons for the change, current requirements for ABAWDs and potential exemptions, and information about how ABAWDs had been contacted regarding the changes. (A copy of the bulletin as appended to this report.)

In speaking with stakeholders who work with SNAP, most confirmed that they had either received a bulletin or attended a meeting where a DHS representative informed the group of the changes.

DHS sent out a bulletin, and we heard about it our MAXIS self-sufficiency sub-committee meeting. Someone from DHS came and talked about it. – Stakeholder

In Ramsey County we have a food support policy group and that has staff – managers and supervisors – so whenever we have any big policy change, or we notice that something isn't right with the practice, we bring it to the work group, strategize, and an email will go out to the whole staff; sometimes they'll also say, "Let's talk about it at unit meetings." – Stakeholder

There is a Food Coalition group and it has a broad array of people who deal with food: community non-profits and a few of the counties to bring the county perspective; that was extremely helpful. – Stakeholder

In addition to the bulletin sent to partners, during the week of August 5, 2013, DHS mailed a notice about the change to all potential ABAWDs – approximately 65,000 people. (Sample notices are included with the bulletin appended to this report.)

Wilder asked stakeholders to provide their feedback on the methods used by DHS to communicate the reinstatement of work provisions. Several felt that sending a mailed letter was inadequate to reach this highly mobile population and that more could have been done, such as posting flyers at homeless shelters and food shelves, or creating a hotline to address questions. However, other stakeholders said that the communication with ABAWDs was as good as it could have been, given how difficult it is to reach this population.

Last August we sent a letter to every potential ABAWD saying that the ABAWD provisions are going into effect and that they would have to comply. We sent that letter in August, so they would have some preparation that they couldn't be on SNAP if they didn't meet the requirements. There is an Employment and Training component, so that was included in the warning letter that said, "You will be getting further information." Then, in September, [ABAWDs] started getting the notices that, if they met the criteria, they would get a notice from their eligibility worker that they had to attend an orientation. – Stakeholder

More could have been done. We expect that everybody is going to read the mail; but they're not reading it or, sometimes, because this can be a highly mobile population, they may not receive the mail. I think communications can always be enhanced. Maybe DHS could have reached out to some of the shelters or to some of the other partners that typically serve this population and given them a heads-up...Set up a hotline for people who have questions; it does not necessarily have to be a live body to answer it, but give them some more information about why this is happening. – Stakeholder

It definitely would have been nice to distribute a flyer or work sheet, especially to people who are already in SNAP or to employment counseling agencies, so if someone knew a client that this change applied to they would know how to direct that client. – Stakeholder

Many of these people have low reading levels, so we send out notices at the 8th grade level, but they still have barriers to understanding or reading notices. But that's not just for ABAWDs; that's for anyone in public assistance. That's why we were relying on our community partners; we plea to them to help us communicate this information to ABAWDs. When an ABAWD calls Legal Aid and says, "I'm not getting my benefits," it's important that they (Legal Aid) understand the provisions as well. – Stakeholder

One of the problems is that [ABAWDs] move a lot or they are homeless; so if we handed out more letters, they wouldn't be receiving the letters regardless. It's sent back to the county because they moved. People live in tents at campgrounds; their phones run out of minutes and you can't leave a voicemail. The only time I hear from them is when they call when their minutes are recharged and they say, "Where's my food?" It's very hard to communicate with people who are homeless. – Stakeholder

All people were contacted via a letter telling them of the changes. Many of the ABAWDs did not bother to update their addresses with their counties. They appear to be a highly mobile group of individuals, so they may change addresses four or five times. We had no way of contacting them. – Stakeholder

Barriers to participation in SNAP

The fact that many ABAWDs did not receive a notice about the reinstatement of mandatory work provisions is a major barrier to participation in SNAP. Stakeholders talked about this, along with other barriers, throughout their conversations with Wilder. Findings from the stakeholder interviews are highlighted below.

Many ABAWDs did not receive notice of the change, or did not understand it.

According to stakeholders, one of the major barriers to participation in SNAP is the lack of knowledge amongst ABAWDs about how they should apply for and maintain their benefits, either because they have not received the proper information or because they did not understand it. All of the stakeholders with whom we spoke talked about the transience of the ABAWD population and the difficulty in reaching them, particularly through mail. One stakeholder said that “in [one large county] alone, 1,000 notices were returned to sender,” illustrating that ABAWDs are not getting the information they need. In addition, stakeholders discussed the high illiteracy rate amongst this population. Even when they receive a notification, they may have a difficult time reading or understanding what the letter says.

Many of them are homeless, so they didn't get the letter, then suddenly their case is closed and they're wondering why. – Stakeholder

The clients that we're seeing are really vulnerable...They are a transient population; they're mobile. But they need to be in specific, approved employment training – a lot are not ready to be in the training, or there are not enough spots for people to get into those trainings. Because they're so mobile it's difficult to reach them. Many didn't get the notice about policy changes; it has been really difficult. – Stakeholder

In [one large county] alone, 1,000 of those notices were returned to sender. So, that's 1,000, and probably many more, that got no notice that they were going to be losing their core food support. That is completely consistent with what we are seeing, which is a group of ABAWDs who have no idea why they are losing their SNAP benefits. – Stakeholder

Among this population there is a high illiteracy rate, as well as people who are scared to open notices like that. There are many reasons why this population may not have received the notice. It is so striking to me that with everybody involved knowing what this population is like, that we would decide to send out mailed notices. It is incredibly distressing. – Stakeholder

The people we serve are...not necessarily going to understand the notices. Some of the notices that are sent out by the state are really confusing; that has been one of our complaints, whether they are approval or denial notices. They're just confusing. – Stakeholder

[One barrier is] understanding the mail they get and deciphering what it means and what action they have to take; this just adds another step for ABAWDs. They have to get to a certain place at a certain time for training. – Stakeholder

More work is needed to receive the benefits, which is exacerbated by a lack of access to transportation. Stakeholders also discussed the barrier of additional work (i.e. attending an orientation and Employment and Training program) in order to receive SNAP benefits. For many in this population, particularly in rural Minnesota, the lack of access to transportation makes it difficult, if not impossible, to attend a training. A couple of stakeholders said that ABAWDs in their region have not been attending the required orientation, most likely because they do not have the necessary transportation or because they do not understand the importance of going. Motivation to complete the extra work may also be low; there is some sentiment amongst ABAWDs that the amount of work involved to apply for benefits is not worth the payoff.

Now there is more effort in accessing benefits. There are transportation issues and we've got to coordinate with ABAWDs to develop an employment plan. – Stakeholder

Another barrier is transportation; we have a lot of rural clients. We do have a bus service in the area, but it doesn't go to all of the rural areas. – Stakeholder

So few come in for orientation that it doesn't sink in until they get a notice at the end of the third month, but then we can't do anything at that point...There is hand off from the financial worker to the employment provider, which will tell the ABAWD when they come in, "Here are the conditions. Take it home and study it." But there is more need for front-end encouragement to attend the orientation. – Stakeholder

Complicating factors at the state-level

The barriers faced by ABAWDs have been exacerbated by a combination of factors at the state level, including misunderstandings about the waiver and its exemptions, a lack of adequate money and resources to provide the necessary training to ABAWDs, and generally bad timing on the ending of the waiver.

There was little understanding that Minnesota was receiving a waiver: A few stakeholders said that, because Minnesota had been receiving a waiver from mandatory work provisions for over three years, there was a general lack of understanding about the definition of an ABAWD or how the policy works; new employees had to be educated and current employees had to be reminded about mandatory work provisions.

We had been a voluntary state for so long that the financial people didn't know who the ABAWDs were. We had to reintroduce ABAWDs to providers; it was a large undertaking.
– Stakeholder

There was no knowledge that Minnesota had been receiving a waiver, so we had to bring people up to speed, even with my colleagues, so they could educate their own clients... DHS could have done a better job at getting the word out. – Stakeholder

We had a lot of employees that started when we were on the waiver, so we had to retrain the people that knew what the old policy was and then train anybody we had on-boarded during that time period. Initially it was quite a bit of work. – Stakeholder

Minnesota had a waiver for three plus years. We're state-supervised county administrators; job counselors are contracted by the counties, so we have tremendous turn-over of staff at the county level. We had lots of retirements, so when we started talking about ABAWDs in October, there was a whole new population of eligibility workers that hadn't been in the agency prior to when we had the ABAWD work provisions in effect. We had to reintroduce them to work provisions on October 1. – Stakeholder

Some eligibility workers may not understand the exemptions to mandatory work provisions: According to stakeholders, one barrier to participation in SNAP is a lack of knowledge and understanding about the factors that could potentially exempt an ABAWD from mandatory work provisions, such as a disability. This lack of knowledge is an issue for both workers and ABAWDs. There are some workers who do not know what the exemptions are, or the signs to look for when they meet with an ABAWD. On the other hand, ABAWDs may not realize that they have a disability, or may feel reluctant to share information about their disability with their worker; therefore, they cannot get the exemption.

Some ABAWDs aren't disclosing their disabilities [to get an exemption]. – Stakeholder

[One barrier is] understanding all of the exemptions...[Workers] need to have a better understanding of what the exemptions are, and also making sure the individuals (ABAWDs) let us know. SNAP recipients need to let us know, so we can let them know if they meet an exemption. – Stakeholder

If you're disabled, you're exempt from this policy...Both [workers and clients] don't understand the disabled exemption. We've tried to do a good job, saying, "Remember this is the policy," so that we're refreshing staff that these are the rules. – Stakeholder

I've had two physicians call me since last October, because they had [my clients] come in and say they need the [exemption form] filled out to get their food; the doctors didn't know what it was. – Stakeholder

Because we were on the waiver, we didn't necessarily have every SNAP recipient coded correctly. We had to go in and code those and clean up the data; we needed to make sure they didn't meet an exemption; they could have easily met an exemption throughout those few years that MN/Hennepin County was on the waiver. – Stakeholder

There is a lack of money and resources to fund the required components of mandatory work provisions: Several stakeholders commented that there is not enough money to operate the Employment and Training programs, even though they are required under the mandatory work provisions for ABAWDs to receive their benefits. The changes have been particularly difficult in some counties where workers feel overwhelmed because there are not enough staff to address the influx of ABAWDs who are losing their SNAP benefits. A few stakeholders also said that more mental and physical health assessments are needed in order to help qualified ABAWDs get a medical exemption, but that there are not enough resources to conduct such assessments.

We don't have enough resources available for counties...There is no money to support trainings, but we're obligated to do it. – Stakeholder

You can't just go to a local non-profit for training. It has to be a very specific program; but some counties don't even have the dollars to run these Employment and Training programs, or their allocations are so tiny that they don't see any value in running them. There are woefully inadequate dollars for training for this population...In addition, there is a need for these adults to be seen for assessment so they can get back on SNAP, but there is no money for assessment; no one is following up; we don't see that level of case management. – Stakeholder

We don't have enough money to operate the Employment and Training programs. – Stakeholder

We were bombarded as a county with how many ABAWDs we had...and we had to provide them with the orientation. DHS provided us with a list of ABAWDs, but we had thousands. – Stakeholder

It was a slow start. We didn't see the impact immediately, but this spring and summer [2014] we have seen a steady stream of ABAWDs who have lost their SNAP benefits and they don't know why...Trying to get them all into a training program [has been difficult]...we just don't have the capacity. – Stakeholder

The reinstatement of mandatory work provisions coincided with other major events at the State: According to some stakeholders, one issue that contributed to inadequate communication between partners and to ABAWDs was timing; the reinstatement of mandatory work provisions coincided with the government shutdown in fall 2013, as well

as the initiation of the Affordable Care Act. Stakeholders said that, because of these events, workers were not able to pay as much attention to the waiver ending, or to the communication efforts.

Part of the problem was the timeliness; when the clock started ticking [in November 2013] how were we going to track down thousands of people and get them to orientation? We tried to go back and figure that out. – Stakeholder

The State shut-down really disrupted communication. – Stakeholder

[The ending of the waiver] was rolled out the day that the Affordable Care Act went into effect, which was creating greater consternation among financial workers because of MNSure. We had a hard time getting them to pay attention to ABAWD changes. We spent last year sending out tips, retraining, and getting people (eligibility workers) familiar with ABAWDs. – Stakeholder

We sent the counties a list of individuals who needed to be contacted – those who would be considered ABAWDs. Then the providers asked for lists of individuals; we weren't sure who was going to be providing services at that point. Then there was the government shut down in October, so that slowed things down. – Stakeholder

Feedback from homeless adults

In addition to gathering feedback on mandatory work provisions from stakeholders, Wilder also analyzed data collected by DHS Office of Economic Opportunity staff from listening sessions with homeless single adults, which were conducted over the summer of 2014. Based on the data given to Wilder Research, a total of 39 ABAWDs were interviewed at seven different shelter locations (although more listening sessions were conducted with non-ABAWDs).

Of the 39 ABAWDs who spoke with DHS staff, the majority were male (74%) and over 35 years old (64%). Half (49%) identified their race as White, while 26 percent identified as African American, 15 percent as American Indian, and five percent as African. Five percent considered their ethnicity to be Hispanic or Latino.

These adults were most often single (62%) and living alone (82%), with low levels of education and low monthly incomes (average: \$444.60 per month). Four in ten (39%) had been homeless for six months or more (Figure 1) and over half (54%) reported that they were currently receiving SNAP benefits (Figure 2). For additional data tables on the demographics of these 39 ABAWDs, please see the appendix.

1. Current duration of homelessness (N=39)

	N	%
Less than one month	11	28%
1 month to 6 months	11	28%
6 months to 1 year	5	13%
More than 1 year	10	26%
Missing	2	5%

2. Currently receiving SNAP (N=39)

	N	%
Yes	21	54%
No	12	31%
Unsure	3	8%
Missing	3	8%

During the listening sessions, ABAWDs were asked if there are “any areas where the county or the state could do a better job of helping families experiencing homelessness.” Of the 28 ABAWDs who responded, the most common answer was better communication (61%) (Figure 3). Several said that they do not like receiving mailed letters or that the wording of the letters is too difficult to understand, while others talked about the lack of information around the Employment and Training requirements; they said that they did not know they had to work to earn their SNAP benefits.

Four in ten (39%) ABAWDs talked about the need for more or better resources, particularly transportation (18%). Other resources mentioned included help with a job search, help improving interviewing skills, and “better resources” in general.

Several ABAWDs, although they did not answer the question directly, talked about their negative perceptions of SNAP, as well as the pride that prevents them from accepting government benefits (18%). Others said that the amount of work required to receive benefits is not worth the effort (14%). While these are not direct recommendations for helping homeless persons, they do indicate the need for better communications around SNAP benefits.

This analysis is based on the data sent to Wilder by DHS staff. Any questions regarding the quotes or questions asked during the summer 2014 listening sessions should be directed towards DHS Office of Economic Opportunity.

3. Ways for the state to do a better job of helping homeless adults (N=28)

	N	%
Better communication (especially on Education and Training requirements)	17	61%
More resources (e.g. job searching, interviewing skills, etc.)	6	21%
More/better access to transportation	5	18%
Pride/negative perceptions of food stamps	5	18%
Benefits are not worth the effort to apply	4	14%
Reduce paperwork/Increase speed of processes	3	11%
Don't know	3	11%
Other	4	18%

Note: Percentages equal more than 100% as respondents were able to give multiple responses.

The county is terrible at communicating. I kept calling and calling; it took 11 days longer than they said...It seems like no one will answer the phone...We felt brushed off. I didn't know if we had to come back or not. – ABAWD

There's no way lots of people got that letter. I don't go get mail like I should. – ABAWD

I don't want mail. – ABAWD

I didn't get the letter. Why did they give me \$306 if they just take it back? About the county – give them the tools and resources. Be more compassionate and patient. – ABAWD

A letter is a solid way to communicate but it needs to be in layman's terms. Make the ABAWD definition easier to understand. Then you need a follow-up appointment with a worker to further discuss and connect. If someone read it to me and explained it, I might have followed-through. – ABAWD

I don't know about employment part. I want them to email me. That would work. When you're homeless, the mailing situation is really bad. – ABAWD

No one said I had to look for employment. I go to the workforce center all the time. No one from food stamps told me to go there. I have to do change of address forms every time I move to a different shelter. – ABAWD

The county could be better at providing resources. The shelter could provide access to the resource room all times; Section 8 could be quicker. – ABAWD

Transportation in [county] only runs once an hour. We need more busses; there are no buses on Sundays...Also, I need clothing for work interviews. – ABAWD

I've always been independent; I'm too embarrassed to get food stamps. I applied for MFIP, but it's a 30-day wait. I tried to get a job, but I'm so far along pregnant no one will hire me. Caseworkers make you do a lot of footwork...I'm really getting the run-around. I walk all the way to these offices and they don't know what they are doing. – ABAWD

I've never applied for food stamps. I've been told I qualify for GA and food stamps but I had to swallow my pride to even come here. All people do with food stamps is buy chips and pop; I don't need that. All they have around here is a gas station. I need socks and shoes. – ABAWD

I heard something about 3 out of 36 months, but it's not worth it. – ABAWD

Issues to consider in moving forward

- **Enhance strategic communication and messaging to ABAWDs.** Several stakeholders (as well as a majority of the 39 ABAWDs) talked about the need for improved communication to ABAWDs. This means letting them know about the changes in a way that is more likely to reach them, such as an informational sheet, flyer, or poster, as well as providing the most specific information possible. One stakeholder suggested the need for DHS to publish a list of approved Employment and Training programs, along with how many slots are typically available in those programs (knowing that the number will never be exact). Strategic communication would also include attempting to improve the perception of applying for and receiving SNAP benefits. As a couple of stakeholders and ABAWDs mentioned, pride and the feeling that the benefits are not worth the payoff often deter ABAWDs from applying for SNAP.

What really needed to happen was for the letter to be first attempt [at contact with ABAWDs] and for anybody who had a returned letter to have follow-up. There should have been some kind of additional effort, more strategic communication and outreach efforts in terms of posters, etc. We have a food coalition that DHS has built and they could have sent materials to those partners and we could have put flyers in our office that said "Are you an ABAWD? We can help you restore benefits." – Stakeholder

[Communication could be improved by] having some kind of an information sheet that's given to ABAWDs as they apply or a poster stating "If you fit these criteria you will be limited unless..." Have workers give out the information at application. – Stakeholder

I think communications can always be enhanced; do some public awareness. DHS could have reached out to some of the shelters or community clinics that typically serve this population and given them a heads-up, so that when they interact with the ABAWD population they can ask if they are aware of the change and then direct them to the county. Or, they could set up a hotline for people who have questions. – Stakeholder

We need to let ABAWDs know that three months is a big difference. It's a quarter of the year and it's something to help you get food on the table... Three months is a significant time, even though it may seem really short. If an ABAWD comes in, they should know that it's a full three months; it would be prorated for this month. – Stakeholder

It would be great to see the stigma erased with the elderly population. They are on assistance for medical, but when I mention food or cash assistance they say they don't want any of that. It would be wonderful if they'd think it's OK to have food support... They don't see medical help as having stigma; it's medical and it's a necessity, but food is not; and it's difficult for them to apply and it's difficult for them to use it in the store because they don't want people to know they are getting help. – Stakeholder

We are trying to figure out marketing tools so eligibility workers will have an easier time trying to get people excited about the services we're providing. We are trying to think of tools and tips as we talk to county workers, "Here are some tips on how you can get ABAWDs excited about our services/help they can get from us if they can attend an orientation." We want to give that eligibility worker some clues if ABAWDs seem reluctant to explain their barriers. Help self-identify any barriers to work that might give ABAWDs an exemption from the time limits...we want to help our workers be able to notice something during the interview that would lead you to believe they have a barrier – try to do a probing question to help them find a way to be exempt and still operate within the law.
– Stakeholder

- **Better educate those who work with ABAWDs, especially regarding the exemptions.** Stakeholders suggested that those who work with ABAWDs are still trying to understand the policy change. Sharing specific details are important in enhancing this education – How many people have been terminated from SNAP? Who are they? How many slots are available for each Employment and Training program? In particular, there seems to have been a great deal of confusion around the exemptions and who qualifies. More education is needed for both eligibility workers and ABAWDs; workers need to be better able to identify a disability so that person can get an exemption. A few interviewees suggested implementing mental health screenings and assessments.

From an internal perspective; it was about understanding the policy; and getting the new employees on track; it is policy and we do have to follow it. – Stakeholder

Somebody needs to get everyone on the same page, and say, "Here is the number of those terminated from SNAP. If you see them, first and foremost, determine their eligibility ...Number two, explain where the resources are." Where are the open slots to put people into an Employment and Training program? I think there are counties where there aren't any training opportunities. These conversations need to happen in a formal way.
– Stakeholder

DHS should be strongly encouraging counties to assess individuals for mental illness and other physical disabilities. Currently it's not a requirement, but it should be close to a requirement; a strong suggestion. – Stakeholder

Eligibility workers should be identifying some of the disability issues. They need to have good interviewing skills...If finance folks have a knowledge base about disabilities and exemptions, there can be further screening. – Stakeholder

- **Provide more options for applying to SNAP and attending the orientation.** Several stakeholders said that the application process should be easier for ABAWDs; suggestions included doing more online interviews or telephone interviews or generally “meeting people where they are” so that all segments of the population can easily apply for SNAP benefits. A couple of stakeholder also recommended automatically enrolling people in SNAP if they qualify for other programs, such as Medical Assistance (MA) or the school lunch program. A few stakeholders said that

there should also be more time slots available for the orientation; a couple of counties, such as Ramsey, appear to have simplified their application process (screening and enrolling applicants within the same day) and have already added more options for orientation times.

[We need to] leverage telephone interviews and do fewer face-to-face interviews. We know that the elderly are not accessing the program, so it's a good way to get them; it's easy. – Stakeholder

[We need] a better online application. Sometimes we could also do better outreach and meeting people where they are, because not everybody can do the online application. If county workers or SNAP outreach workers were to meet people where they're at and help them do the application, such as going to senior citizens buildings and bringing applications...saying, "We'll be at a small town in Minnesota from 8 – 11 on Tuesday morning taking applications and meeting people where they're at. – Stakeholder

We need direct certification of the school lunch program. If you have eligibility for SNAP currently, you can be participating in the free or reduced lunch program. I would like to see that reversed; so if you have eligibility for the school lunch program, you would be directly certified for SNAP accessing a population who hadn't taken the time to come in...There should be the capacity for non-governmental entities to process and approve applications...that would improve access to SNAP. Also, when someone is eligible for MA, they should be eligible for SNAP; there is a federal option for that, which doesn't happen in MN...Some counties do intake only one time per day and some do it all day; folks should be seen immediately if they meet the criteria. – Stakeholder

Ramsey County went to a same-day process, where we screen you, find out if you're eligible for SNAP, and then get you enrolled on the same day. – Stakeholder

It's certainly gotten a lot better in the last month. The regular orientation makes it a lot easier and I have had a lot of successes with clients. I just sent them to the orientation. Maybe it would help having more orientations; or having them at some of the work force center, so ABAWDs could just enroll afterwards. – Stakeholder

- **Work with local farmers markets and emphasize healthy eating.** A couple of stakeholders talked about the recent efforts of SNAP in working with farmers markets to accept EBT. They recommended that more be done to connect farmers markets with SNAP and EBT, so that once ABAWDs have received their benefits, they have more affordable, healthy options available to them.

There has been a lot of effort put toward eating better; the food coalition is looking at federal grants that are coming out about better eating; hopefully that project will come through – so we need education about SNAP, but better eating too. Many people are only eligible for 3 months and that is such a short period of time to get people to eat healthy; that's going to be a challenge as people look at this project. – Stakeholder

I'm trying to get our local farmer's markets to accept EBT; that could be one step because if you use it for buying fresh fruits and vegetables, it would be less than going into the local Walmart and buying other foods that aren't as nutritious. If they could buy fruits and vegetables, if they could see other people doing it, they would say, "Hey that's great," versus buying cookies and soda at Walmart. – Stakeholder

Clearly there has been some frustration around the way the mandatory work provisions were communicated to ABAWDs. In the wake of this frustration it is important for DHS and its partners to share as much knowledge as possible about the policy change, especially with new staff who may have started their position during the waiver. Ensuring that both staff and ABAWDs have as much information as possible about the mandatory work provisions, particularly on exemptions, will help more ABAWDs receive their much-needed benefits.

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For more information

For more information about this report, contact Stephanie Nelson-Dusek at Wilder Research, 651-280-2675.

Authors: Stephanie Nelson-Dusek

MARCH 2015

Appendix

Bulletin: Reinstatement of the Work Provisions for Able-Bodied Adults Without Dependents (ABAWDs) for the Supplemental Nutrition Assistance Program (SNAP) sent by DHS

Bulletin

August 14, 2013

Minnesota Department of Human Services -- P.O. Box 64941 -- St. Paul, MN 55164-0941

OF INTEREST TO

- County Directors
- Income Maintenance Supervisors and Financial Workers
- Employment Services Staff
- Child Care Supervisors and Staff
- White Earth Tribal Staff
- Social Services Supervisors and Staff

ACTION/DUE DATE

Please read, review and implement this change for October 1, 2013.

EXPIRATION DATE

August 14, 2015

Reinstatement of the Work Provisions for Able-Bodied Adults Without Dependents (ABAWDs) for the Supplemental Nutrition Assistance Program (SNAP)

TOPIC

SNAP ABAWD changes for October 1, 2013

PURPOSE

Notify County Eligibility Workers and Employment Services Providers about the mandatory work provisions for ABAWD effective October, 1, 2013

CONTACT

Policy questions related to this bulletin should be directed to PolicyQuest.

Systems questions related to this bulletin should be directed to the TSS Help Desk.

SIGNED

ERIN SULLIVAN SUTTON

Assistant Commissioner

Children and Family Services Administration

I. Background:

In January 2009, due to the nationwide recession and high unemployment rate, the United States Department of Agriculture (USDA) Food and Nutrition Services (FNS) offered all states an opportunity to waive the mandatory work provisions for able-bodied adults without dependents (ABAWDs) between the ages of 18 and 50. This waiver set aside employment and training requirements as a condition of receiving SNAP benefits. Sanctions for non-compliance were waived as well.

Due to an improved economy and the unemployment rate in Minnesota, the ABAWD waiver expires on 9/30/13. Minnesota transitions back to the mandatory work provisions for ABAWDs on 10/01/13.

II. ABAWD Requirements:

Beginning 10/01/13, ABAWDs will now be required to participate in employment and training activities at least 80 hours per month or receive SNAP benefits for no more than 3 months in a 36 month time period unless they are exempt.

The ABAWD provisions in CM 0011.24 are still correct. The introductory paragraph stating these provisions are waived will be removed. The policy should be reviewed and applied effective 10/01/13 to any open or pending SNAP cases that meet ABAWD criteria.

Some important things to remember:

- The count of the 3 months of eligibility starts over 10/01/13. There is no need to look back.
- A counted month is the first full month an ABAWD receives benefits if they do not qualify for an exemption. Do not count a month with prorated benefits.
- Once started, the 36 month time period continues to run uninterrupted even during times the person does not receive benefits or is exempt.
- If an ABAWD has used his/her 3 months of eligibility, the ABAWD is no longer eligible and is closed off the case. The ABAWD may reapply if the ABAWD meets an exemption and all other eligibility factors are met. The earliest this provision could be applied is January 2014.
- The 3 months do not have to be consecutive.

What are the exemptions to the 3 month time limit?

- Receiving cash assistance
- Under age 18, or age 50 or older
- Responsible for the care of a child under the age of 18 in the household. If there are 2 parents in the unit, both are exempt. If there is doubt as to whether non-parents should be given this exemption, determine if the child is under the parental control of the non-parent. An adult who has parental control of the child is entitled to this exemption.

- Medically certified as pregnant.
- Exempt from work registration. See CM section 0028.06.12 (Who Is Exempt From FS Work Registration). Code his/her work registration status carefully on the MAXIS STAT/WREG panel. This information is used by MAXIS when sending workers appropriate DAIL messages. It is also used for reporting and funding purposes.

Prior to 2009, Minnesota was able to exempt Indian reservations and some counties due to the local employment conditions. Minnesota has submitted a request to FNS to waive ABAWD work provisions in any reservation and/or county in the state based on employment data from the Minnesota Department of Employment and Economic Development (DEED). If DHS gets approval from FNS, DHS will communicate this to counties and reservations.

What if an ABAWD does not meet an exemption to the mandatory work provisions?

Able-bodied adults may “earn” ADDITIONAL MONTHS of eligibility, or avoid using 1 of their 3 entitled months when they work or participate in work activities an average of 20 hours per week (80 hours per month). These do not have to be consecutive months. For each month that the person works or participates in work activities at this level, the person “earns” a month of SNAP benefits. Countable work or work program activities are:

- Working in paid employment 80 hours per month, including self-employment. This includes use of accrued sick or vacation time, if available.
- Participating in the Trade Adjustment Act (TAA) or Workforce Investment Act (WIA) services.
- Participating in SNAP E&T activities. **NOTE:** SNAP E&T job search and job search training do not count toward the 20 hour per week/80 hour per month requirement unless the person is co-enrolled in WIA. See CM section 0028.03.03 (Employment Services/SNAP E&T Required Components).
- Participating in unpaid Work Experience or Work Fare. However, instead of averaging 20 hours a week, the required number of hours of participation is the household’s monthly SNAP allotment divided by the HIGHER of the state minimum wage (\$6.15 per hour) or the federal minimum wage (\$7.25 per hour).

Workers must retroactively count (or uncount) an ABAWD’s month of benefits as 1 of the 3 months of entitlement to SNAP benefits if it is later learned that the determination of the ABAWD’s exemption status, or whether or not the ABAWD met monthly work requirements, was incorrect. This change must be recorded in MAXIS. As long as the client meets an exemption for some part of the month, he/she is exempt for the entire month.

Some things to keep in mind in 2014 and forward if an ABAWD has used up their 3 months of eligibility:

- An ABAWD who has used up their 3 months of SNAP eligibility can “earn” an additional month of benefits by working or participating in approved work activities for 80 hours in a calendar month. (NOTE: SNAP E & T is available only to current participants.)

- The ABAWD need not be a current SNAP participant to regain eligibility. The hours must be completed before eligibility can be granted. Once the person has worked the required number of hours, eligibility can be granted back to the beginning of the month or the date of application, whichever is later.
- Once eligibility is granted, eligibility will continue as long as it is prospectively anticipated that the ABAWD will work the required number of hours for the next month. Your Employment Services (ES) Provider will track hours of participation in work program activities.
- A participant who has re-established SNAP eligibility by working or participating in work activities for 80 hours in a month as described above can qualify for 1 additional 3-month period of eligibility. If the person's job or work activity ends, or if the hours are reduced below 80 hours per month, the person qualifies for the additional 3-month period of eligibility. This provision does not apply if the person voluntarily quit the job without good cause.
- The new 3-month period of eligibility starts the 1st day of the 1st month in which SNAP benefits are provided under this 2nd 3-month eligibility period. It runs uninterrupted until the 3-month period is completed, regardless of whether the person received SNAP benefits all 3 of those months. This 2nd 3-month period is only available once in any 36-month period.
- Explain these provisions to ABAWDs during the intake and eligibility recertification process.

Other general provisions:

- All ABAWDs are mandatory SNAP E&T participants, and must be referred to SNAP E&T when SNAP eligibility is determined or when the participant's exemption from ABAWD provisions ends. You must inform the ES Provider of the participant's ABAWD status so that this can be taken into consideration when determining the SNAP E&T services needed.
- For information on how to treat income from ineligible able-bodied adults, see CM section 0016.39 (Income of Ineligible Able-Bodied Adults).
- With mandatory work provisions in place for ABAWDs effective 10/01/2013, sanction policy as outlined in CM 0028.20 (Failure to Comply- FSET) must be followed.
- For information on six month reporting requirements for ABAWDs see CM section 0007.15.03 (Unscheduled Reporting of Changes-SNAP).
- Document in CASE/NOTES ABAWD exemptions or referrals of non-exempt ABAWDs to ES Providers. See Section V on page 5 of this bulletin for information about ES referrals.

III. ABAWD Notification:

During the week of August 5, 2013 all potential ABAWDs, identified by MAXIS, were sent a notice of this change. See Attachments A and B.

IV. MAXIS System Requirements:

During the last week in August, MAXIS will issue DAIL messages to cases with potential ABAWDs. Review each case and update the FSET Work Reg status field and the ABAWD Status field if needed for an exemption for the benefit month 10/13. The MAXIS system identifies SNAP E&T as FSET on the STAT/WREG panel. Follow the information below when reviewing the STAT/WREG panel:

- A STAT/WREG panel is required for all SNAP unit members age 16 and over. The "FSET E&T Work Reg Status" field on the WREG panel is the mandatory field which you must complete. This field is used to record each member's exemption status, or participation status (for NON-EXEMPT members). Background edits will require you to update this field if the status is not supported by data on other STAT panels.
- If the ABAWD is not exempt use code 30 - Mandatory FSET E&T participant.
- Enter an exemption code for all unit members who provide verification of their exempt status. If verification of a member's exempt status is pending, you should code these members as Mandatory SNAP E&T participants (code 30) until verification has been provided.
- Allow the ABAWD 10 days from the date of contact with the eligibility worker to verify the exemption for all unit members claiming exempt status. If verification of the SNAP E&T exemption is not provided by 10/01/13, you must complete a referral for a SNAP E&T Orientation appointment for 10/01/13 and after. Background "Warning" edits will be sent if a mandatory SNAP E&T participant has not been scheduled for a SNAP Orientation appointment.

See Attachment C for the STAT/WREG codes and the ABAWD status codes.

V. MAXIS referrals to WorkForce One:

Referrals from MAXIS need to be sent to the WorkForce One (WF1) system so that ES Providers can get the referral for non-exempt ABAWDs that they are to serve. The STAT/WREG panel should have the following data:

- FSET Work Reg Status = 30 (Mandatory FSET participant).
AND
- Defer FSET/No Funds = N
AND
- ABAWD Status = 06, 08, 10, or 11
AND
- STAT/UNEA Type is not coded with a 03 or 14 for that person.

For SNAP, referrals are sent to WorkForce One after approving ELIG results.

After the ELIG approval, Eligibility Workers are automatically brought to the WORK panel to select an ES Provider. Choose an ES Provider found on the WORK panel in the pop-up selection window.

ES Providers cannot open a case for ABAWDs without a referral. In addition, ES Providers cannot record participation hours, track services, track activities, get credit for serving the participant and/or placing them in a job if a referral is not sent from MAXIS. Not getting a referral can result in a negative impact on State participation rates and other reports critical to funding.

For more information about the WF1 referral process for ABAWDs, see POLI/TEMP sections TE10.26 and TE10.26.01.

VI. Americans with Disabilities Act (ADA) Advisory:

This information is available in accessible formats for individuals with disabilities by calling 651 431-4049 or by using your preferred relay service. For other information on disability rights and protections, contact the agency's ADA Coordinator.

(Recipient's Name)

Date of Action:

(Recipient's Address)

MAXIS Case Number

This letter is to tell you that you are an Able-Bodied Adult Without Dependents (ABAWD) for the Supplemental Nutrition Assistance Program (SNAP).

- An ABAWD is an able-bodied adult between and ages of 18 and 50. You have no children in the home under the age of 18 or another adult who needs you in the home for care purposes.

The rules for the SNAP program have changed. Effective October 1, 2013 you will need to work with the SNAP Employment & Training (E&T) requirements.

- What does this mean for an ABAWD?
This means you can only get SNAP benefits for 3 months in a 36-month period unless you are exempt
 - Working at least 80 hours per month or
 - Participating in an approved employment program at least 80 hours per month.

- What is an exemption?

Contact your worker listed below and he/she will tell you if you meet an exemption.

- What if I am not exempt?

Your worker will refer you to the SNAP E&T office close to where you live.

- What will the SNAP E&T office do?
 - Provide you with an assessment of your skills and education
 - Work with you to develop an employment plan
 - Provide job search activities to help you find work
 - Provide support services as available to assist you in your employment plan

NOTE: If you live on a Reservation you may be exempt from participation with these SNAP E&T rules.

Worker Name:

Telephone number: (xxx) (xxx-xxxx)

If ABAWD is a Recipient (Not Member 01)

Address
County
City, state, zip code

Month DD, YYYY

Case Number:

Case Name
Case Address

This letter is to tell you that (NAME OF RECIPIENT) is an Able-Bodied Adult Without Dependents (ABAWD) for the Supplemental Nutrition Assistance Program (SNAP).

- * An ABAWD is an able-bodied adult between the ages of 18 and 50. You have no children in the home under the age of 18 or another adult who needs you in the home for care purposes.

The rules for the SNAP program have changed. Effective October 1, 2013, ABAWDs will need to work with the SNAP Employment & Training (SNAP E&T) requirements.

WHAT DOES THIS MEAN FOR YOU?

This means ABAWDs can only get SNAP benefits for 3 months in a 36-month period unless you are exempt:

- *Working at least 80 hours per month or
- *Participating in an approved employment program at least 80 hours per month.

WHAT IS AN EXEMPTION?

Contact your worker listed below and he/she will tell you if you meet an exemption.

WHAT IF I AM NOT EXEMPT?

Your worker will refer you to the SNAP E&T office close to where you live.

WHAT WILL THE SNAP E&T OFFICE DO?

They will do the following:

- *Provide you with an assessment of your skills and education
- *Work with you to develop an employment plan
- *Provide job search activities to help you find work
- *Provide support services as available to assist you in your employment plan

NOTE: If you live on a Reservation you may be exempt from participation with these SNAP E&T rules.

Worker:

Telephone:

STAT WREG Codes

FS Work Registration/FSET Participation Status

(Choose The First Code Which Is Applicable for each ABAWD in the SNAP case)

Exempt From Work Registration And FSET Participation

- | | | | |
|----|---|----|--|
| 03 | Temp/Perm Incap (Min 30 Days) | 11 | Receiving Or Applied For Unemployment Insurance |
| 04 | Responsible For Care Incap HH member (1 Exemption Per HH) | 12 | Enrolled In School, Training Program Or Higher Education |
| 05 | Age 60 Or Older | 13 | Participating In CD Program |
| 06 | Under Age 16 | 14 | Receiving MFIP |
| 07 | Age 16-17, Living W/Pare/Crgvr | 20 | Pending/Receiving DWP |
| 08 | Resp For Care Of Child < 6 Years Old (1 Exemption Per HH) | 22 | Applied for SSI |
| 09 | Empl 30 Hrs/Wk Or Earnings At Least = To Min Wage X 30 Hrs/Wk | | |
| 10 | Matching Grant Participant | | |

Mandatory Work Registration, Exempt From FSET Participation

- | | | | |
|----|--------------------------------|----|-----------------------------|
| 15 | Age 16-17 Not Lvg W/Pare/Crgvr | 17 | Receiving RCA Or GA |
| 16 | 50-59 Years Old | 18 | Providing In-Home Schooling |
| 21 | Resp For Care of Child < 18 | | |

Non-Exempt From FSET Participation

- 30 Mandatory FSET Participant

Sanction

- 02 Fail To Cooperate With FSET
33 Non-Coop Being Referred

ABAWD Status

(This is another mandatory field on the STAT/WREG panel that must be completed)

- 01 Meets Work Registration Exemption
- 02 Under Age 18
- 03 Age 50 Or Older
- 04 Responsible For The Care Of A Minor Child In The Household
- 05 Medically Certified As Pregnant
- 06 Employed 20 Hours Per Week, Averaged Monthly
- 07 Participating In An Approved Work Experience Program
- 08 Participating In Other Approved Employment & Training Program
- 09 Resides In An Area Which Has Been Granted A Waiver From ABAWD Requirements (Includes Counties and Reservations approved by FNS).
- 10 ABAWD Counted Month
- 11 Eligible For A Second 3 Month Period Of Eligibility
- 12 RCA Or GA Recipient
- 13 ABAWD Extension

Letter to ABAWDs

(Recipient's Name)

Date of Action:

(Recipient's Address)

MAXIS Case Number

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 - Provide you with an assessment of your skills and education
 - Work with you to develop an employment plan
 - Provide job search activities to help you find work
 - Provide support services as available to assist you in your employment plan

NOTE: If you live on a Reservation you may be exempt from participation with these SNAP E&T rules.

Worker Name:

Telephone number: (xxx) (xxx-xxxx)

2014 DHS listening sessions – ABAWD information

1. Gender (N=39)

	N	%
Male	29	74%
Female	8	21%
Transgender	0	0%
Other	0	0%
Missing	2	5%

2. Age (N=39)

	N	%
21 and under	1	3%
22 to 34 years old	11	28%
35 to 44 years old	5	13%
45 to 54 years old	10	26%
55 and older	10	26%
Missing	2	5%

3. Race and ethnicity (N=39)

	N	%
White	19	49%
African American/Black	10	26%
American Indian	6	15%
Hispanic/Latino	2	5%
African	2	5%
Asian/Pacific Islander	0	0%
Missing	2	5%

Note: Percentages equal more than 100% as respondents were able to give multiple responses.

4. Household status (N=39)

	N	%
Single	24	62%
Divorced	6	15%
Married, separated	4	10%
Committed relationship	2	5%
Widowed	1	3%
Married, living together	0	0%
Missing	2	5%

5. Monthly income (N=39)

	N	%
None	12	31%
Less than \$300/month	7	18%
\$300-\$499/month	4	10%
\$500-\$999/month	3	8%
\$1,000+/month	1	3%
Missing	12	31%
Minimum (excluding '0')	\$120	
Maximum	\$1,760	
Average (excluding '0' and missing)	\$444.60	

6. Education level (N=39)

	N	%
Less than high school diploma or GED	7	18%
High school diploma or GED	13	33%
Some college	9	23%
Associate degree (AA, AS, etc.)	4	10%
Bachelor's degree (BA, BS, etc.)	2	5%
Graduate degree (MA, PhD, etc.)	2	5%
Missing	2	5%

7. Others staying with you (N=39)

	N	%
No	32	82%
Yes, spouse	1	3%
Yes, children	1	3%
Yes, other family	1	3%
Yes, other vital person	2	5%
Missing	2	5%

8. Received Supplemental Nutrition Assistance Program SNAP benefits, including food stamps, in the last 6 months (N=39)

	N	%
Yes	9	23%
No	2	5%
Unsure	1	3%
Missing	27	69%

9. Receive Supplemental Security Income (SSI) benefits (N=39)

	N	%
Yes	0	0%
No	24	62%
Unsure	0	0%
Missing	15	38%

10. Veteran status (N=39)

	N	%
Veteran	8	21%
Non-veteran	28	72%
Missing	3	8%