



Common Cents

New Hampshire Fiscal Policy Institute Blog

USDA Approves Changes to SNAP Work Requirements for Certain Adults

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The federal Supplemental Nutrition Assistance Program (SNAP), which is administered locally as the New Hampshire Food Stamps Program, provides means-tested food assistance benefits to thousands of Granite State families and individuals with low incomes. A federal policy change announced last week would limit the ability of states to waive certain work requirements for specific childless adults in areas with higher levels of unemployment or a lack of sufficient job opportunities.

The Food Stamp Program provides supplemental food assistance benefits while promoting work and work training among individuals who can work, while most of the costs of the program, including all benefit payments, are funded by the federal government. NHFPI has published a [Fact Sheet](#) that provides an overview of the eligibility requirements and benefits of the New Hampshire Food Stamps Program and an [Issue Brief](#) outlining the program and the negative effects of food insecurity.

The first of [three major federal proposals](#) to overhaul SNAP and [reduce enrollment](#) in the program has been [finalized](#). Despite [thousands of public comments](#) from state leaders, advocates, researchers, and the general public outlining the short- and long-term detriments of these changes, the United States Department of Agriculture (USDA) finalized provisions of the change. This approved change concerns individuals who are referred to as able-bodied adults without dependents (ABAWDs). These individuals previously and continue, under this approved change, to have a time limit on their benefits of three months out of a thirty-six month period. These individuals also face the strictest [work requirements](#) of the program if they need benefits for longer than three months. These strict work requirements may be hard to meet in certain areas that lack sufficient jobs, during economic recessions, or when major companies or industries leave a region.

In order for individuals to receive benefits for longer than the three-month time limit, while living in an area lacking sufficient jobs, waivers can be requested by states in order to

remove the limit on benefits for ABAWDs in certain areas. These individuals still must adhere to other [general work requirements](#) in order to receive benefits even if they live in an area covered by a waiver. In order to be eligible for a waiver under existing policy, an area must have a 12-month rolling average unemployment rate over 10 percentage points, have an unemployment rate at least 20 percent higher than the national level, or the state must qualify for extended unemployment benefits. States have some flexibility in grouping counties or municipalities together in order to target regions that are lacking job opportunities. Additionally, states can implement waivers before they are approved by the USDA, which was especially [useful](#) during the last economic recession. This provision allowed for benefits to be dispersed without a time lapse, helping to prevent food insecurity during the recession and recovery periods, as soon as people were income eligible due to lost employment or other situations. Many states, including New Hampshire, utilized waivers during the economic recovery, after the recession [ended](#) in 2009, in order to provide food assistance to individuals unable to meet the additional ABAWD work requirements, while also stimulating local economies by providing benefits that are used locally. The Center on Budget and Policy Priorities has compiled ABAWD waiver utilization into an [interactive map](#) that shows the nearly-nationwide adoption of these effective waivers during the recovery. New Hampshire employed a statewide waiver during and immediately following the recession, and otherwise limited waivers to certain areas in northern New Hampshire in the subsequent years.

The [newly approved change](#) by the USDA, which takes effect in two stages during 2020, strips states of their flexibility to group certain areas lacking sufficient jobs together in order to become waiver eligible. The change also redefines which areas qualify as lacking sufficient jobs and eliminates the ability of states to implement waivers prior to USDA approval. The usefulness of the waiver program in reducing the likelihood of a time lapse in benefits for many individuals enrolled in SNAP, especially during times of economic recession, is evident as New Hampshire utilized them after the economic downturn. Research [suggests](#) SNAP benefits used by recipients were an economic stabilizer and stimulator during the last recession, especially for local economics.

New Hampshire currently has no waivers in place, meaning all ABAWDs must abide by their outlined work requirements to receive benefits for more than three months over a thirty-six month period. However, during and immediately following the last recession, all areas of New Hampshire had waivers in place for ABAWDs. Many were likely unable to meet the additional work requirements mandated during and due to the recession, but could still meet the general, slightly less stringent, work requirements mandated for other categories of recipients in the program. These waivers allowed those individuals to continue receiving assistance throughout the recovery period. These [waivers played a](#)

[vital role in the economic recovery](#), while assisting those most affected by the recession. Now that states will no longer have the ability to group tailored areas that lack job opportunities together, or to implement waivers while waiting for approval, this tool to assist people struggling to find stable work and to put food on the table has been remarkably weakened.

- *Michael Polizzotti, Policy Analyst*