SNAP is not a jobs program. But with a few small changes, it can guide more Americans back to work.

All Americans deserve the chance to provide for themselves and their families. But in today’s fast-changing economy, almost anyone can suddenly find themselves jobless, underemployed or otherwise unable to pay their bills. This is particularly true for low-wage workers, whose meager earnings have not kept pace with the rising cost of living.

The Supplemental Nutrition Assistance Program (SNAP, aka food stamps) is our nation’s guarantee to these families that they will not go hungry while they get back on their feet. SNAP bridges the rough patches in our dynamic job market and ensures that every American can build a healthy, productive life.

While SNAP has a long, successful track record fighting hunger, it was not designed as an employment program. This is a feature, not a bug - most SNAP participants are children, seniors or people with disabilities. But SNAP also serves working families (including recipients known as able-bodied adults without dependents, or “ABAWDs”) who may use SNAP as a bridge back to work.

Federal law requires able-bodied adult SNAP recipients to meet a work requirement in order to receive benefits, and ABAWD recipients face time limits if they fail to find work. The SNAP Employment and Training program (SNAP E&T) helps prepare these adult SNAP recipients for successful re-entry into the job market.

Some states (including Texas) operate E&T programs in which SNAP recipients who are not working or otherwise exempt must register to participate in E&T activities. This is a small population – in 2015, only 6.1% of all SNAP participants were required to participate in an E&T program.¹

But despite states’ flexibility to determine the parameters of their E&T programs and the relatively small population in need, the historical approach has typically been uniform or “cookie-cutter” in its treatment of clients, as well as overly reliant on punitive measures that do not help clients succeed.


In today’s dynamic job market, a more innovative approach to SNAP E&T is needed to improve outcomes for employable SNAP recipients.

This policy proposal:

1. Explains how current E&T policies apply to typical SNAP clients, using the Texas E&T program as an example;
2. Presents recommendations for an updated approach to E&T requirements that requires no new mandatory funding;
3. Illustrates how these changes would benefit SNAP recipients and improve their job outcomes, ultimately reducing their need for SNAP.
1. How does SNAP E&T work currently?

- Current E&T policies in Texas treat all E&T participants the same, despite the diversity in client backgrounds, barriers to employment, and employment history.

- In today’s dynamic job market, a more innovative approach to SNAP E&T is needed to improve outcomes for employable SNAP recipients.

With an estimated 732,392 participants in FY2017, the Texas E&T program is an example of a mandatory program in which limited resources are insufficient to provide meaningful services to all of the SNAP recipients required to participate. Most E&T funds and participants are divided equally between two components: job search, and workfare for ABAWDs. There is no real screening of participants to determine what, if any, help they need to regain employment, and activities often aim for short-term work experiences over comprehensive training. Due to this uniform approach, even the Texas State Plan for FY2017 acknowledges that the state is only able to provide “a fraction of the work registrants” with E&T services due to limited funds.

The following three case studies illustrate how current Texas E&T policies treat very different types of clients in very similar ways. These case studies describe typical clients, not real people, and intend to represent the diversity of circumstances covered by Texas’ mandatory E&T program.

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**TABLE 1: THE CURRENT SYSTEM – A “ONE-SIZE-FITS-ALL” APPROACH**

<table>
<thead>
<tr>
<th>Client 1: MARIA</th>
<th>Client 2: JOHN</th>
<th>Client 3: BERNARD</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>AGE</strong></td>
<td>31</td>
<td>23</td>
</tr>
<tr>
<td><strong>DEPENDENTS</strong></td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td><strong>E&amp;T POPULATION</strong></td>
<td>General Population</td>
<td>ABAWD</td>
</tr>
<tr>
<td><strong>EMPLOYMENT HISTORY</strong></td>
<td>Secure for past 6 months, currently working 20 hours/week</td>
<td>Month to month, currently looking for work</td>
</tr>
<tr>
<td><strong>BARRIERS TO EMPLOYMENT</strong></td>
<td>Minimal</td>
<td>Low education level, low skill</td>
</tr>
<tr>
<td><strong>E&amp;T ASSIGNMENT</strong></td>
<td>Job Search</td>
<td>Workfare</td>
</tr>
</tbody>
</table>

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Client 1: MARIA

Maria is a 31-year-old single mother of one daughter, age 7. She has an associate’s degree and has been working consistently since she graduated. For the past year, Maria has been working 30 hours per week in a retail job; her schedule changes every 2 weeks, but she typically works during the day while her daughter is at school. One day, her daughter gets sick, and Maria has to leave work mid-day. Her supervisor is not happy, and the next time Maria gets her schedule, her weekly hours have been bumped down to 20. As a single mom, Maria and her daughter apply for SNAP benefits to make up the resulting budget shortfall. However, Maria is not meeting the Texas SNAP work requirement of 30 hours per week as long as she is only scheduled for 20. Under the current system, she is required to register for E&T in order to remain eligible for SNAP during the time she needs it the most. Maria is considered part of the SNAP E&T “General Population.” While she already has a job, she will likely be assigned to a supervised job search program, in which she will be required to spend 10 hours per week applying for jobs and practicing professional skills on top of her regular hours working and caring for her daughter.

Client 2: JOHN

John is a single 23-year-old. He dropped out of high school during his senior year but later earned his GED. John has had trouble recently holding onto a job; he works odd jobs here and there, but has never had stable employment. Recently, he interviewed for several positions but was passed over for a candidate with an associates degree. John has been on and off SNAP for a year, receiving benefits for a month at a time when he has been looking for work, and leaving the program during the months he has been working. However, John is an ABAWD and therefore time-limited, and his third—and last—month of SNAP eligibility without work is about to expire. At the end of the month, John will be required to register for E&T if he wants to continue receiving SNAP benefits. As an ABAWD, he will most likely be assigned to a workfare program in which he will volunteer for a nonprofit organization to meet his SNAP work requirement. Though volunteering will count as work experience, John will probably not receive formal training in any particular industry or skill, and his employability will remain unchanged.

Client 3: BERNARD

Bernard is 52 years old and previously had a successful career as an electrician. For the last few years, he has suffered from chronic arthritis and eventually had to stop working. Since then he has tried find less physical work, and in the meantime applied for SNAP to make ends meet. He can’t afford the medication or physical therapy that would reduce his pain or help to rehabilitate him. However, Bernard doesn’t qualify for a disability exemption because he is technically able-bodied. Despite his once successful career, he has limited education and lacks skills in other areas. Under the current system, Bernard would be required to register for E&T and would likely be assigned to job search, despite the limitations that are currently preventing him from working. Though he is not technically disabled or elderly, Bernard has clear barriers that would limit his participation in E&T activities as well as the employment opportunities suitable for him.

“With an estimated 732,392 participants, even the Texas State Plan for FY2017 acknowledges that the state is only able to provide “a fraction of the work registrants” with E&T services due to limited funds.”
2. A Tiered, Targeted Approach Could Improve SNAP E&T

• A tiered approach would screen SNAP recipients for placement into three groups based on employability and assign E&T requirements accordingly.

• Changes to federal and state policies would be necessary to implement a more innovative, flexible approach to SNAP E&T requirements.

• The goal is a more efficient and effective use of E&T funds that targets finite resources to those who most need services, prepares clients for sustainable employment and ultimately reduces the need for SNAP.

• No additional federal funding would be required to adopt this approach.

The case studies above illustrate how SNAP E&T requirements in a mandatory program apply fairly uniformly to clients from various backgrounds. This “one-size-fits-all” approach fails to serve clients in a substantive way, as it presents one solution to a diverse set of problems.

A more nuanced approach is needed and possible. Through policy changes at the federal and state levels, states can adopt a more flexible system designed to screen clients more carefully up-front, reflect clients’ unique situations and barriers to employment, and streamline program costs.

Screening the SNAP work registrant population for placement into three tiers and adjusting E&T requirements accordingly establishes a system in which SNAP E&T dollars can be funneled towards recipients who are most likely to benefit from the services provided. In addition to these tangible policy changes, an adjustment in the “work first” philosophy to employment and training is necessary to properly prepare E&T participants for the workforce and shift from a system that currently incentivizes participation in E&T services as a condition of SNAP eligibility to one focused on job outcomes.

Tier 1: SNAP recipients who have met work requirements through unsubsidized employment for the last 6 months.

SNAP recipients who do not face significant barriers to employment are typically between jobs, have part-time hours temporarily reduced such that they do not meet work requirements, or have temporarily exited the workforce for an unrelated reason, such as a family crisis. Requiring these SNAP recipients to register and participate in E&T activities like job search or workfare is not a productive use of scarce resources, because clients are not likely to benefit significantly from job training programs and have clearly demonstrated their ability and willingness to work.

Recommendation: Institute a 6-month grace period for this tier before E&T registration is required, during which the client is able to independently seek new or adequate employment. Clients would report changes to the state agency to document the reduction of work hours, at which point the 6-month grace period would begin. If the client is unable to find unsubsidized employment or their work hours do not return to the necessary levels within 6 months, the client would participate in E&T or face sanctions at the expiration of the grace period. For ABAWDs, the three-month time limit would begin at the end of the 6-month grace period.

This proposal would require changes to federal regulations related to ABAWD time limits, granting states the option to allow a 6-month grace period before implementing the 3-month time limit. Alternatively, a waiver could be introduced to implement the grace period option. States with mandatory E&T programs would be able to implement the 6-month grace period for mandatory participants who are not ABAWDs through their E&T program design and state plans.
**Tier 2: SNAP recipients with removable barriers to employment.**

These clients are typically able-bodied adults (with or without dependents) who are technically able to work, but may struggle to find employment due to some basic barrier, such as low education level, a criminal record, or limited language proficiency. Clients in this tier should be the primary target population for SNAP E&T funds—with appropriate training, they can enter the workforce and maintain secure employment. Policy changes to work requirements are not recommended for this population; instead, a change in approach is needed.

**Recommendation:** Target E&T funds to increase the capacity for trained case managers to properly assess clients’ individual barriers to employment and assign them to appropriate training or work activities. Instead of a “work-first” approach that prioritizes short-term work experiences such as workfare (for ABAWDs) or job search (for the E&T General Population), resources would be focused on recruiting employers and other stakeholders that recognize the value of training and skills development to improve job outcomes for this group of SNAP recipients. Instead of requiring clients to participate in generic E&T activities to remain eligible for SNAP, these focused resources should be dedicated to providing effective training opportunities that will help clients overcome their specific barriers to employment. These efforts might include partnering with community colleges to provide degree opportunities for ABAWDs, building English classes into the curriculum of skills-training programs for clients with limited language proficiency, or developing apprenticeships specifically designed to address the challenges faced by the reentry population, to name a few. This approach would be more effective than requiring people to engage in activities such as job search when they may lack the skills or qualifications necessary for available jobs.

Current SNAP E&T dollars are very limited. Rather than reducing SNAP benefits or raiding other parts of the SNAP budget for new E&T funds, this proposal emphasizes a more efficient allocation of existing funds to prioritize and invest in SNAP recipients who fall into the second tier—the clients for whom the marginal benefit of employment and training services is greatest, and who would be productive as members of the workforce upon entry. Current workfare and job search programs can be the foundation for this expanded approach as elements of more comprehensive training programs. In particular, existing institutional structures and partnerships with E&T providers can be leveraged to develop more effective programs.

**Tier 3: SNAP recipients with non-removable or significant barriers to employment.**

Clients in the third tier are those experiencing some kind of permanent or severe barrier to employment that falls outside the scope of services offered by SNAP E&T. These clients are not likely to become employable even through participation in SNAP E&T programs. SNAP recipients in this tier may have some kind of undiagnosed disability or impairment that limits or restricts their potential for employment.

**Recommendation:** Improve intake and evaluation procedures during the case management process to determine when a client is unlikely to benefit from SNAP E&T participation due to significant limitations, and exempt these clients.

Similar to recommended improvements in case management for Tier 2 clients, case workers should be able to identify barriers that meet the for exemption. Increasing the ability of case workers to determine when the barriers to employment are surmountable through training (Tier 2) or outside the scope of E&T services (Tier 3) should be a point of emphasis.
Though SNAP can serve as a catchall for low-income Americans in need of food assistance, funding streams for E&T are limited, and SNAP cannot be reasonably expected to address all barriers affecting recipients. Scarce dollars administered through SNAP E&T should be focused primarily on the most relevant concerns that can actually be addressed within the available funding and program constraints. Clients whose needs fall outside this scope should be able to continue receiving SNAP benefits and should be referred to other programs and services that can better address their individual needs through other forms of assistance.

**TABLE 2: CATEGORIES UNDER A TIERED APPROACH TO E&T**

<table>
<thead>
<tr>
<th>TIER 1</th>
<th>TIER 2</th>
<th>TIER 3</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>CLIENTS</strong></td>
<td>SNAP recipients who have met the work requirements through unsubsidized employment for the last 6 months  &lt;br&gt; Clients are considered employable and do not need SNAP E&amp;T training</td>
<td>SNAP recipients with removable barriers to employment  &lt;br&gt; Clients are potentially employable with training</td>
</tr>
<tr>
<td><strong>POLICY RECOMMENDATION</strong></td>
<td>Institute a 6-month grace period before E&amp;T is required</td>
<td>Assess clients’ individual barriers to employment and assign them to appropriate training or work activities; develop more comprehensive training programs</td>
</tr>
</tbody>
</table>

**Increased State & Nonprofit Investment, Better Evaluation Would Support Tiering**

- Other policy and protocol changes would be needed to supplement a tiered approach.
- States should increase uptake of 50/50 spending on E&T and work with third-party organizations to develop targeted training programs.
- Increased data collection and accessibility would allow for the development of accountability mechanisms based on objective E&T outcome measures.
The tiered approach outlined above includes recommendations for policy and protocol changes to work and E&T requirements. States that wish to operate mandatory E&T programs should consider these recommendations in order to more efficiently administer their programs and improve program outcomes. However, additional policy changes should be considered to support a more comprehensive approach. The following recommendations would supplement a tiered approach through adequate funding, training opportunities, and accountability mechanisms.

**Increase 50/50 Spending**

In addition to policy changes at the federal level, states that wish to continue operating mandatory programs should conduct a comprehensive assessment of client barriers to employment and target increased 50/50 state/federal funding at the removal of these barriers by private, third party organizations. This effort would supplement the increased capacity of case workers to identify clients’ barriers by providing complementary training programs designed to target those barriers. Broadening the scope of available E&T programs would require engagement and coordination between the state agency, community partners, and groups familiar with local labor market needs. Responsibility must be shared between the state agency—to encourage third-party groups to develop E&T programs and support them with state funding—and by outside organizations to express legitimate interest in contracting with the state as E&T providers. A push to increase 50/50 funding partnerships is consistent with the proposed strategy to funnel E&T dollars towards Tier 2 clients, as local organizations would have the financial support to develop programs specifically designed to help clients overcome their individual barriers to employment. However, this approach should not be interpreted as a recommendation that states make mandatory programs more punitive. The use of 50/50 spending should supplement a tiered approach to E&T requirements by increasing flexibility for clients through expanded training and career opportunities that will meet their needs.

**Improve Program Evaluation**

Comprehensive outcome reporting for SNAP E&T programs has been scarce. FNS will release the first report on national E&T outcome measures in January 2018, but public access to participation, demographic, and outcome data is virtually non-existent. Increasing transparency of SNAP E&T operations and conducting comprehensive evaluations should be a priority for policy makers and other stakeholders. Not only will increased data collection and analysis provide valuable insight into strengths and weaknesses of program components, results can inform funding allocations, provide rationale for high-level policy decisions, and improve client interactions with SNAP E&T at various points in the system. In particular, states that operate mandatory E&T programs should prioritize program evaluation in order to monitor program costs, client outcomes, and the effectiveness of various E&T activities and sanctions.
3. Improved Client Job Outcomes, Reduced Reliance on SNAP

- A tiered approach would identify and respond to clients’ unique situations and treat them accordingly.

- Case workers would have the ability to properly assess clients’ barriers to employment and assign them to appropriate E&T activities.

The goal of a tiered system is to account for clients’ individual circumstances and adjust program requirements accordingly to improve outcomes. Using the case studies above, this section illustrates the ways in which SNAP recipients would benefit from a tiered approach to E&T requirements and other recommended policy changes and funding measures. It should be noted that the proposed system should not be considered a more “lenient” approach, but rather a more efficient use of federal and state E&T dollars through modernized E&T service options.

**Tier 1 Client: MARIA**

Maria would have a 6-month grace period during which she could independently seek new employment or increase her work hours back up to 30. She would still report changes to the state agency to document the reduction in her hours, but she would not be required to participate in E&T until the end of the 6-month period (if she still does not meet work requirements). Maria would still be able to receive SNAP benefits at the time she most relies on them, and the state would not waste money requiring her to attend job search and training activities when the program is unlikely to benefit her in any significant way.

**Tier 2 Client: JOHN**

John’s case worker would identify his education level as the primary barrier to stable employment. Instead of assigning him to workfare, the case worker would refer John to a community college or vocational degree program, or assign him to an on-the-job training program that would provide him the opportunity to develop skills in a particular industry. John would still be subject to work requirements at the risk of losing his SNAP benefits, but his experience with E&T would be tailored to his individual situation with the goal of preparing him for a job that would pay enough to eventually disqualify him from receiving SNAP.

**Tier 3 Client: BERNHARD**

Bernard would be exempt from the E&T requirements. A case worker would be able to identify that his particular barrier to employment is significant and outside the realm of what SNAP E&T can reasonably address. The case worker could also refer Bernard to other services that could help him get back to work or address his medical condition, but he would be able to keep his SNAP benefits without participating in E&T.
TABLE 3: IMPACT OF TIERED APPROACH ON CLIENT EXPERIENCES

**Client 1: MARIA**
- **Tier 1**
  - **E&T Assignment:** None; 6-month grace period until E&T required
  - **Impact:** Able to independently seek new work or wait for work hours to increase again without penalty, continue receiving SNAP during time of greatest need

**Client 2: JOHN**
- **Tier 2**
  - **E&T Assignment:** Vocational degree program with job placement services upon completion
  - **Impact:** Completes vocational training program prepared for an entry-level job in an industry with demand for workers

**Client 3: BERNARD**
- **Tier 3**
  - **E&T Assignment:** None; exempt from E&T requirements
  - **Impact:** Able to continue receiving SNAP benefits without penalty

**Conclusion**

This proposal represents a more nuanced and flexible approach to E&T requirements, as well as a commitment to a more cost effective SNAP E&T program.

Identifying which clients are most likely to benefit from E&T services and prioritizing funds to train this group would be the most effective use of federal and state E&T dollars. Increased capacity during the case management process will be essential to ensure that clients are classified into the appropriate tier, unique barriers to employment are identified, and the E&T assignment is appropriate in targeting these barriers.

SNAP is a nutrition program, not a jobs program. But with these changes, SNAP can better help recipients prepare for sustainable employment and reduce their likelihood of relying on SNAP in the future.
Federal Policy Recommendation

Advocate for a tiered approach to SNAP E&T work requirements

• Transition from a “work first” to a “work force” approach to SNAP E&T, prioritizing training appropriate to clients’ individual and specific barriers to employment.

• Better serve clients by focusing E&T funds and services on the sector of SNAP recipients most likely to benefit from employment and training services.

• Work towards a more flexible E&T system rather than promoting a “one size fits all” approach to SNAP E&T and work requirements.

State Policy Recommendation

Leverage and increase state 50/50 spending to design E&T programs that work for vulnerable populations

• Consider ABAWDs, poorly educated, limited language proficiency, and reentry populations as priority groups.
  • Third-party organizations can supplement and fill gaps created by decreased funding for vulnerable groups such as ABAWDs.

• Invest in apprenticeships, credential programs, and adult education to train clients for success in sustainable, living wage employment and career paths.

• Involve a variety of stakeholders to design and fund innovative approaches to E&T.
  • Expand partnerships with third-party and community organizations familiar with the local SNAP population and community needs.
  • Utilize expertise of Workforce Development offices to design programs that complement local labor market demand.

Prioritize and invest in program evaluation, including data collection, tracking, and assessment mechanisms

• Build on federal reporting requirements to identify effective E&T components as well as areas for improvement.

• Increase public access and ability to independently evaluate program components and advocate for client-focused solutions.

Special thanks to Samantha Night for all of her contributions to this proposal.

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