

How Do Work Requirement Waivers Help SNAP Respond to a Recession?

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ECONOMIC ANALYSIS

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Introduction

In principle, the Supplemental Nutrition Assistance Program (SNAP; formerly The Food Stamp Program) is designed to expand during economic downturns. Work requirements embedded in the program can impede this expansion if SNAP participants cannot find work or newly unemployed individuals can only stay on the program for a short time. In practice, ongoing policy responses at the state and federal levels, in combination with standing rules to waive work requirements, ensured that SNAP functioned both as a safety net and a fiscal stabilizer during the Great Recession. Because many workers were unemployed for so long and the Great Recession was so deep, maintaining SNAP eligibility and increasing program take-up were critical both to individuals impacted by the recession and to economic stimulus policy.

SNAP is a nearly universal means-tested transfer program in the United States that offers nutrition assistance to low-income families and also provides economic stimulus to communities. A household is only eligible for SNAP if it has a gross income below 130 percent of the federal poverty level or a net income below the poverty line.¹ Consequently, eligibility expands when unemployment rates rise and household incomes fall. SNAP eligibility also expands during economic downturns when states produce evidence that an area has a lack of sufficient jobs; in these places, so-called able-bodied adults without dependents (ABAWDs) do not have to meet work requirements as a condition for SNAP program participation.

Since 1996, certain non-disabled SNAP participants ages 18–49 without dependent children are limited to 3 months of benefits out of 36 months if they do not work, participate in workfare, or take part in an employment and training program for at least 20 hours per week. States are not required to provide these participants with slots in training programs and states have a finite number of good cause exemptions that can apply to individuals. For many participants, this provision functions as a time limit for SNAP eligibility.

These time limits inhibit SNAP's capacity to expand during economic downturns and to provide resources to purchase

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food to otherwise eligible households, limiting SNAP's effectiveness both as an automatic stabilizer and as a safety net. But, the law provides a remedy. Since 1996, and affirmed in each subsequent Farm Bill reauthorization, states and areas within a state are eligible for waivers from work requirements when there is evidence of a lack of sufficient jobs. The intent of a work requirement waiver is to ensure that in times when it is difficult to find work, ABAWDs are not penalized for not working. Waivers also make SNAP a more-effective automatic stabilizer: times when jobs are scarce are precisely the times when fiscal stimulus is most potent and necessary.²

Waiving time limits during recessions allows otherwise eligible households to participate in the program when work is hard to come by. This supports the tendency of SNAP caseloads to increase with unemployment (Ganong and Liebman 2018). Poverty and economic hardship typically increase in recessions and decrease in economic expansions such that households with few resources are especially affected by the business cycle. Among poor households, the effect of the Great Recession was particularly severe. The unemployment rate rose notably more for lower education workers, tripling from a prerecession low of 5.8 percent in October 2006 to 15.8 percent in February 2010 for individuals with less than a high school degree. This is a typical feature of recessions: less-educated workers face larger employment losses when the economy contracts (Aaronson, Daly, Wascher, and Wilcox 2019). Additionally, it took longer for the unemployed to find jobs; the average duration of unemployment increased from a prerecession low of 17 weeks in 2006 to 39 weeks in 2011.

Waiving time limits improves the capacity for SNAP to act as an automatic stabilizer and to target fiscal stimulus dollars that flow through the economy. SNAP, Medicaid, and unemployment insurance provide the majority of automatic spending fiscal stabilization during economic downturns (Russek and Kowalewski 2015). Moreover, SNAP's responsiveness to downturns has increased over time (Bitler, Hoynes, Jencks, and Meyer 2010). Research shows because SNAP benefits are spent quickly, increases in benefits in response to an economic downturn serve as effective fiscal stimulus to local areas (Keith-Jennings and Rosenbaum 2015; Blinder and Zandi 2015).

Over the course of the Great Recession, SNAP expanded to provide more benefits to eligible and newly eligible participants, including ABAWDs. To buttress the joint goals of providing resources to households and fiscal stimulus to the economy, states, Congress, and both the Bush and Obama Administrations supported the expansion of SNAP work requirement waivers for eligible places during the Great Recession. These actions were necessary for macroeconomic stabilization and because the existing rules for waiver eligibility

were not sufficiently responsive to economic circumstances.

In this economic analysis, we look at how evidence for lack of sufficient jobs was used to increase and extend SNAP waiver eligibility, both in standing regulation and through policy action taken over the course of the Great Recession and subsequent recovery. We find that different triggers were more effective at improving SNAP's capacity to function as an automatic stabilizer at various points in the business cycle. Our analysis shows that standing regulations were the most potent trigger during the Great Recession's onset but were too slow to provide the degree of coverage that policymakers wanted. It was not until the Bush Administration clarified how work requirement waiver eligibility would be tied to Emergency Unemployment Compensation (EUC) in January 2009 that coverage met policy goals.

This analysis is relevant in a current policy context. In a [Notice of Proposed Rulemaking](#), the comment period for which closed on April 10, the U.S. Department of Agriculture (USDA) proposed modifying the economic conditions under which states could apply for waivers from work requirements. The USDA's stated goal is to limit waiver eligibility, arguing that at a time of low national unemployment, "nearly half of ABAWDs live in areas that are covered by waivers despite a strong economy" (981). In the [Regulatory Impact Analysis](#) that supports the rule, the USDA describes how its proposed changes to qualified geographies and admissible lack of sufficient jobs evidence would limit waiver eligibility in 2018. We find that the USDA's proposed rule would respond more slowly to a recession than current rules, would curb a state's ability to apply for work requirement waivers when its economy is weak or relatively weak compared to the overall national economy, and would limit access to SNAP during a sluggish recovery.

The Effect of Work Requirements on Caseload Levels and Employment

Work requirements in SNAP are meant to force work-ready individuals to increase or maintain their work effort every month by withholding food assistance if a person is not working a minimum number of hours or engaged in training or education. In practice, the application of work requirements affects many groups: those who are unable to work, those who are able to work but who do not find work, those who are working but not consistently above an hourly threshold, and those who are meeting work or exemption requirements but fail to provide proper documentation.

During the Food Stamp Program's introduction in the 1960s and 1970s, reductions in employment and hours worked were observed, particularly among female-headed households (Hoynes and Schanzenbach 2012). But in general, there is little evidence that SNAP receipt itself depresses work effort substantially (Fraker and Moffitt 1988; Hoynes and Schanzenbach 2012; East 2016).

While one might worry that providing income support decreases the incentive to work, households participating in the SNAP program are always better off as the dollar value of earned income increases. SNAP has an earnings disregard of 20 percent as part of the net income calculation, meaning that the value of the earnings disregard increases with income (Wolkomir and Cai 2018). In addition, SNAP benefits are phased out slowly as income increases. When a person moves from being a labor force nonparticipant to working while on SNAP, total household resources will increase; similarly, as a SNAP beneficiary earns more, total household resources continue to increase. The combination of the earnings disregard, a gradual phase-out schedule—that states have the option to further extend and smooth—and a low maximum benefit for ABAWDs mitigate work disincentives.

Whether work requirements could offset a work disincentive would depend on their targeting and whether those who are not working could readily increase their labor supply. In previous work, we have characterized the labor market experiences of the ABAWD population, showing that 75 percent of program participants in a two year window are in fact in the labor force at some point (Bauer 2018; Bauer, Schanzenbach, and Shambaugh 2018). However, SNAP participants often fail to satisfy the work requirements, cycle above and below the hours threshold, or face employment hurdles. The minority who are not in the labor force are substantially limited by their health, even after excluding those who receive disability income from the sample. While this descriptive work does not directly examine the causal impact of work requirements on labor market outcomes, it is nonetheless critical for understanding the work experiences and barriers to labor force participation among this population. It also suggests that the work requirements are unlikely to substantially increase participation.

Some recent analyses use a quasi-experimental research design to identify the effect of SNAP work requirement waivers on caseload levels and employment.³ Research conducted by Jeehoon Han (2019) and Timothy Harris (2019) uses age-based cutoffs and changes in waiver eligibility rules to identify the effect of SNAP work requirements on employment and program caseloads.

These analyses fundamentally use the same strategy for

identifying causal impacts, but they vary in the Great Recession time period they cover, methodological choices related to age cutoffs, and geographic units. Han looks at the effect of work requirements from 2005 to 2017 and compares 47 to 49 year-olds with 51 to 53 year-olds while Harris looks at the effect of work requirement reimposition from 2010 to 2016 and compares 45 to 49 year-olds with 50 to 54 year-olds. Han additionally uses hand-collected data on how states applied their 15 percent exemptions to further clarify what areas were and were not exempt from work requirements.

Han finds no negative effect of place-based work requirements waivers on employment and no positive effect of the reimposition of work requirements on employment. These findings are consistent with work requirements having no effects on employment. Harris typically finds an extremely small (less than one percent) but statistically significant impact of work requirements on employment, but even the most generous specifications find the number incentivized to work is far smaller than those removed from the program.

The evidence is clear that work requirements decrease SNAP caseloads, including at times when caseload expansion is aligned with automatic stabilization (Ganong and Liebman 2018; Han 2019; Harris 2019; Ziliak, Gundersen, and Figlio 2003). Han finds that when work requirements are waived, program participation increases and when work requirements are reimposed, program participation decreases. Indeed, Ganong and Liebman found that work requirement suspension during the Great Recession accounted for two-thirds of the increase in SNAP participation among ABAWDs.

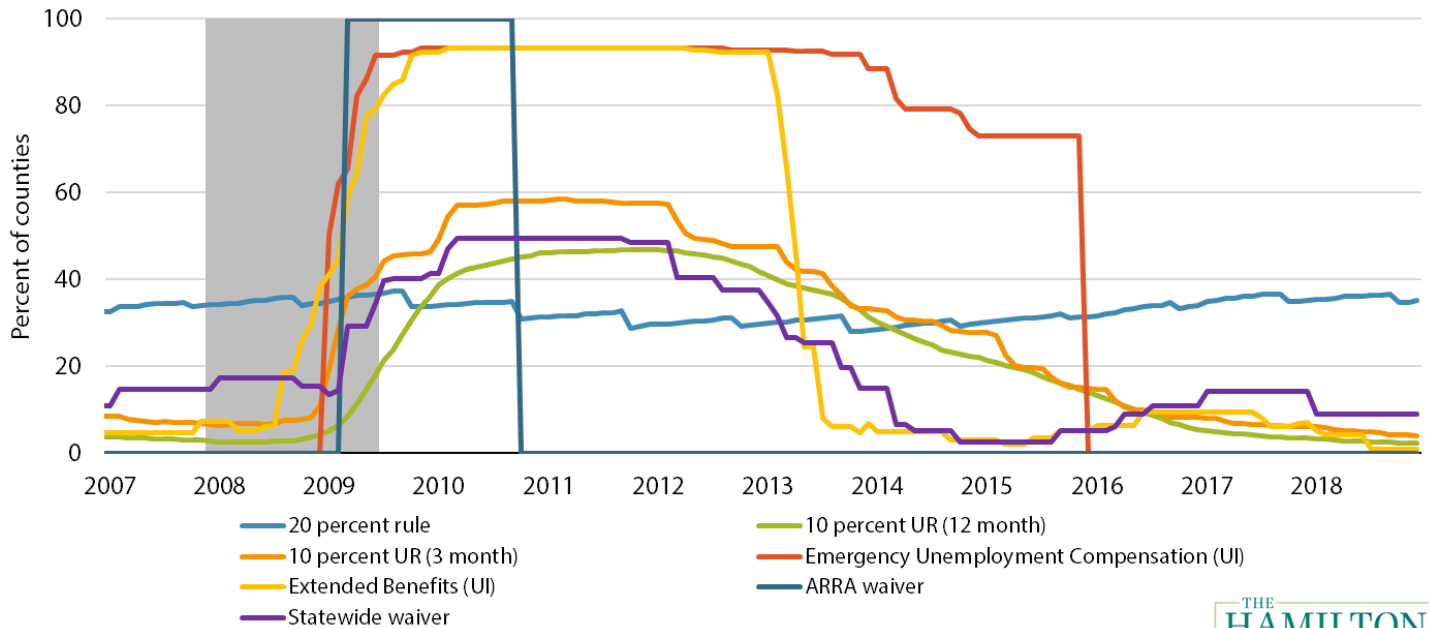
SNAP Work Requirement Waiver Triggers during the Great Recession

As there is no one way to identify the conditions that make it difficult to secure employment, there are several measures of labor market weakness in the current rules for SNAP work requirement waiver eligibility. Lack of sufficient jobs evidence can be absolute (above certain levels of unemployment) or relative (compared to national average) as both may be an important signal to a state that economic conditions warrant waiving work requirements. States have broad discretion to identify and define areas that meet these criteria.

States are permitted to apply to the USDA for waivers to the time limit provisions for the entire state as well as sub-state geographic areas if their economic conditions meet certain standards. The state must be able to provide evidence that the state or a state-determined sub-state area: (1) has a recent

FIGURE 1.

Counties Eligible for A Work Requirement Waiver by Trigger, 2007–18



Source: Local Area Unemployment Statistics, BLS (2000–2018); EB and EUC Trigger notices (DOL); Bureau of Labor Statistics (2000–2018); authors' calculations.

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twelve-month average unemployment rate over 10 percent; (2) has a recent three-month average unemployment rate over 10 percent; (3) has a historical seasonal unemployment rate over 10 percent; (4) is designated as a Labor Surplus Area (LSA); (5) qualifies for Extended Benefits to Unemployment Insurance (EB); (6) has a low and declining employment-to-population ratio; (7) has a lack of jobs in declining occupations or industries; (8) is described in an academic study or other publications as an area where there is a lack of jobs; or (9) has a 24-month average unemployment rate 20 percent above the national average for the same period, starting no earlier than the start of the LSA designation period for the current fiscal year.

In this section, we model the share of counties that would have been eligible for a waiver based on each trigger from 2007 to the present, (a) in existing regulation and (b) through policy changes throughout the Great Recession. The geographic unit considered in each of the following models is the share of counties eligible for a waiver. Counties can gain eligibility individually, as a county in a labor market area (LMA) that is eligible, or because the county is in a state that has a statewide waiver.⁴

Figure 1 models eligibility for work requirement waivers from 2007 to present. The set of eligibility standards are based on standing regulation as well as policy changes made over the course of the Great Recession to increase waiver eligibility. This figure shows the share of counties covered by a work requirement waiver when a state, county, or LMA qualified for

a waiver under any of the existing triggers in SNAP regulation; when a state qualified for a waiver based on EB⁵ or Emergency Unemployment Compensation;⁶ and when the entire country qualified for a work requirement waiver following the enactment of the American Recovery and Reinvestment Act (ARRA).⁷

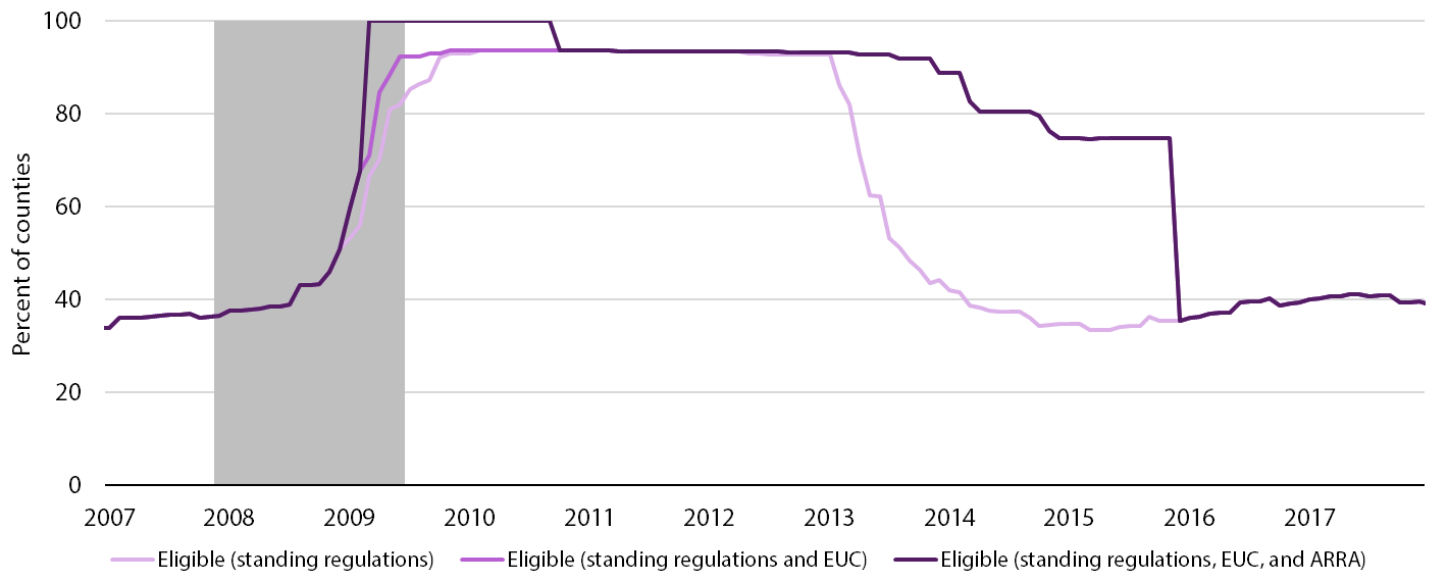
The 20 percent rule (light blue) slowly increases the availability of waivers at the start of the recession. This analysis shows that the vast majority of areas waived from the rules in the third quarter of 2008—a period when the economy was losing over 300,000 jobs a month—were eligible for waivers due to the 20 percent rule. Still, it is not a perfect trigger. If the entire country faces uniformly rising unemployment rates, the waivers would not be available anywhere until local 3-month (or 12-month) unemployment rates exceed 10 percent or the EB-based triggers turn on.

During the Great Recession, EUC was authorized in June 2008, but it was not until January 2009 that the Bush Administration clarified that states eligible for a particular tier of EUC were also eligible for SNAP work requirement waivers (USDA 2009). Furthermore, the American Recovery and Reinvestment Act (ARRA) provided nationwide eligibility for waivers from SNAP work requirements from February 17, 2009 through September 30, 2010.

About 90 percent of counties became qualified (an increase from 50 percent) when the Bush Administration tied waiver

FIGURE 2.

Counties Eligible for ABAWD Work Requirement Waiver, 2007–17



Source: Local Area Unemployment Statistics, BLS (2000–2018); EB and EUC Trigger notices (DOL); Bureau of Labor Statistics (2000–2018); authors' calculations.

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eligibility to EUC; through ongoing memoranda linking work requirement waiver eligibility to different EUC tiers, a high level of waiver eligibility was maintained through 2016. Given that roughly 35 percent of counties were eligible based on standing rules in 2008, had waiver eligibility been tied to EUC upon enactment, work requirement waivers would be an even more effective counter-cyclical tool.

If eligibility had not expanded based on EUC and ARRA, standing policy with regard to statewide waivers would still have provided some increasing coverage, covering about 90 percent of counties through 2013. EB-based eligibility provided the widest amount of coverage, but its acceleration in 2008 was not sufficiently early or fast enough to generate broad access to waivers at the recession's onset. As well, standing rules would not have maintained as high an eligibility rate throughout the sluggish recovery as EUC-based eligibility.

Combining these indicators into three groups—eligibility based on standing policy, additional eligibility based on EUC, and additional eligibility based on ARRA—we can model the effect of existing waiver policy and of the policy preferences of Administrations of both parties and Congress with regard to waiver eligibility (figure 2).

The 20 percent rule, and to a lesser extent EB, provided waiver eligibility coverage until the Bush Administration linked waiver eligibility to EUC. Existing and recession-responsive policy functioned to provide close to 100 percent waiver eligibility from 2009 to 2014. In the absence of EUC and ARRA, the 20 percent rule is the most effective of standing rules at providing

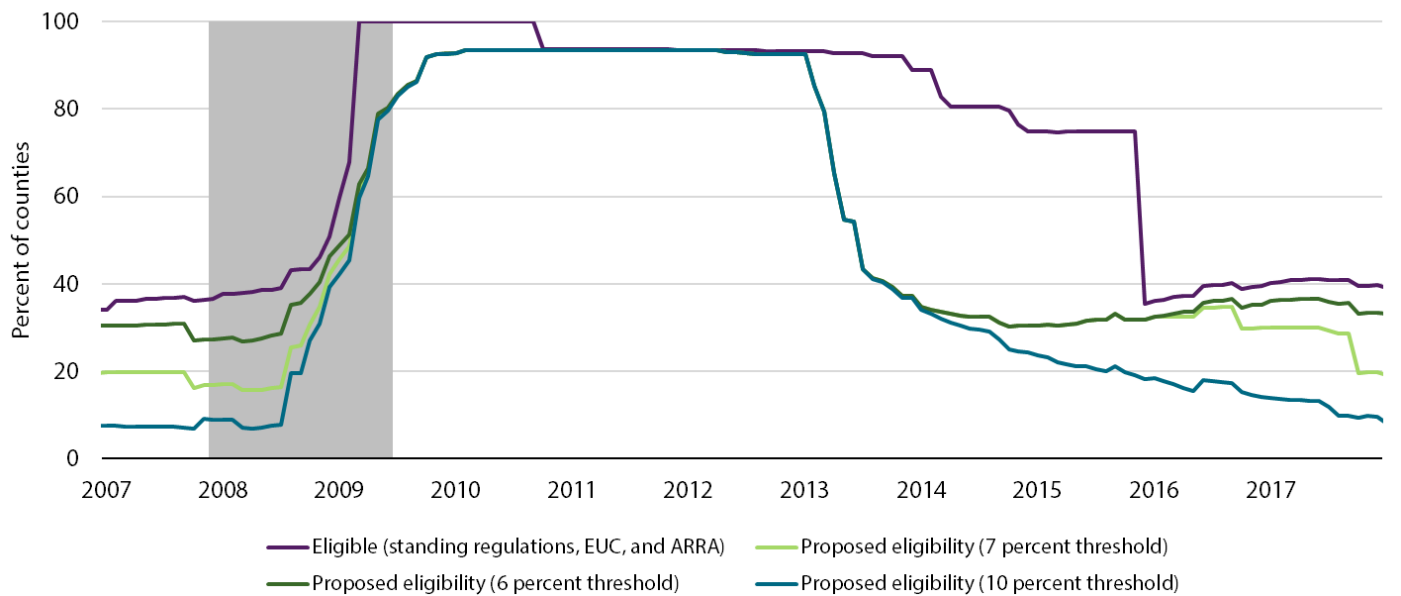
waiver eligibility at the start of the recession, and EB and eligibility among counties with unemployment rates above 10 percent provide the most waiver eligibility during the recovery. No standing rules provide coverage of the scale and speed associated with policy actions taken during the Great Recession through ARRA and EUC. This highlights that while existing rules can help SNAP function as intended in recessions, the current evidence standards for a lack of sufficient jobs do not allow for waivers to take effect as policymakers deemed necessary.

Modeling the USDA Proposal for Work Requirement Waiver Triggers, 2007–17

In this section, we model the share of counties that would have been waived from work requirements had the USDA's proposed rules been in effect. The USDA has maintained the rule that if a state is eligible for EB, the state is eligible for a work requirement waiver; otherwise, statewide waivers cannot be obtained unless each and every sub-state geographic unit individually qualifies. USDA proposes to continue to allow counties and LMAs to qualify for a waiver if they have an average unemployment rate of 10 percent over twelve months. They also propose to add an unemployment rate floor to the 20 percent rule, whereby a place is waiver-eligible if its unemployment rate is 20 percent above the national unemployment rate and at least 7 percent over 24 consecutive months, starting no earlier than the first month that the Bureau

FIGURE 3.

Counties Eligible for ABAWD Work Requirement Waiver, Proposed Regulations versus Actual Eligibility during the Great Recession, 2007–17



Source: Local Area Unemployment Statistics, BLS (2000–2018); EB and EUC Trigger notices (DOL); Bureau of Labor Statistics (2000–2018); authors' calculations.

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of Labor Statistics uses to determine LSAs. While USDA stated that the 7 percent unemployment rate floor was its preferred standard, it also put forward alternative floors of 6 and 10 percent. They remove all other lack of sufficient jobs evidence standards.

Figure 3 shows the difference between the choices of policymakers working to stabilize the economy during the Great Recession and how waiver eligibility would have worked based on the USDA's proposed rules. The purple line shows eligibility for work requirement waivers based on standing regulations, EUC, and ARRA. The proposed eligibility lines combine EB, the 10 percent rule, and the 20 percent rule with varying unemployment rate floors.

Both at the start of the recession and in the event of a sluggish recovery, the proposed rules diminish SNAP's economic stabilization and safety net roles. Had the USDA's proposed rule been in place in the first quarter of the Great Recession, when the economy was losing 300,000 jobs a month and when SNAP rolls should expand to all-comers, waivers would have been limited to fewer than one in five counties had a 7 percent unemployment rate floor to the 20 percent rule been in place. The 10 percent floor (teal) would have left fewer than 10 percent of counties eligible. The 6 percent standard (dark green) would have covered fewer than 30 percent of counties.

Under both standing and proposed rules, waiver eligibility

declines substantially beginning in 2013. But, the decision of policymakers during the Great Recession was to use policy tools to expand and extend waiver eligibility during the recovery, primarily through EUC, through the end of 2015. Since 2016 places with relatively high unemployment have maintained eligibility.

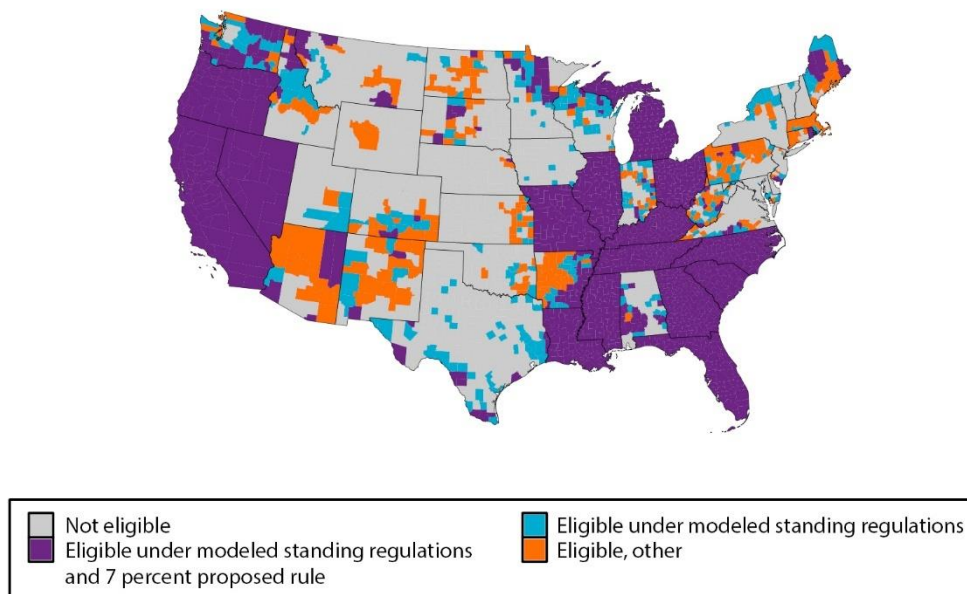
In the preceding analyses, we have modeled waiver eligibility to the extent possible and clearly articulated the ways in which we would not be able to model certain features of the existing rules. Most notably, we were unable to model sub-state regional eligibility and were unable to model eligibility based on Labor Surplus Areas. By adding data from publicly available maps produced by the [Center on Budget and Policy Priorities](#), we are able to identify counties that are eligible for work requirement waivers for those states that implemented these standards.⁸

Figure 4 shows which counties in 2008 would have been eligible for work requirement waivers under both current and proposed rules as we have previously modeled (purple), which counties would have lost eligibility due to proposed changes in standing rules that we modeled (blue), and which counties would have lost eligibility because they are regionally eligible or eligible by one of the criteria (like LSAs) that we are unable to model (orange).

In 2008, during the Great Recession, most states used the flexibility afforded by standing rules to quickly respond to

FIGURE 4.

Waiver Eligibility by Standing and Proposed Rules, 2008



Source: Local Area Unemployment Statistics, BLS (2000–2018); EB and EUC Trigger notices (DOL); Bureau of Labor Statistics (2000–2018); authors' calculations.

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changing economic conditions and cover areas that would not be individually eligible—either by applying for statewide waivers or through regional eligibility. As economic conditions deteriorated, existing flexibility with regard to both geographic unit and economic indicators allowed states to respond more quickly to the recession than federal policymakers. As the map shows, many places across the country would have lost eligibility had the proposed rule been in place at the onset of the Great Recession.

USDA proposes amendments to existing policy that would limit the flexibility of states to use work requirement waivers in response to indicators of an economic downturn, its persistence, and sluggish recoveries in particular places. As this analysis emphasizes, if there is a problem with the current rules, it is the failure for waiver eligibility to respond to the onset of a recession. The proposed rule weakens waiver responsiveness to the onset of an economic downturn, a problem that both the Bush Administration and Congress addressed in relation to current rules.

Conclusion

SNAP is highly effective and efficient, both in meeting core program goals and as an automatic stabilizer. SNAP work requirements impede the program's capacity to serve these objectives when there are not sufficient work opportunities or individuals face barriers to work, which is why individual and place-based waivers from time limits have been a part of the

program since 1996. These waivers give states both the flexibility to turn off work requirements when local economies are not generating enough jobs and for good cause.

The evidence presented in this economic analysis shows that the set of work requirement waiver triggers that currently are in operation did not respond as swiftly as they could have to the onset of the Great Recession, and that federal policymakers took action to apply waivers nationwide.

We also show how USDA's proposed changes to work requirement waiver eligibility would have operated over the past decade. These analyses—which were provided to USDA and to Congress, when Hamilton Project Director Jay Shambaugh [testified to the U.S. House Nutrition, Oversight, and Department Operations Subcommittee on this subject](#)—show that the USDA's proposed rule would have been slower to respond to deteriorating economic conditions than current rules, weakening an important automatic stabilizer in the fiscal policy toolkit.

Understanding how SNAP functions as both an automatic stabilizer and a component of the social safety net is crucial to The Hamilton Project's mission of promoting broadly shared economic growth. It is important that policymakers consider how current and proposed eligibility standards for work requirement waivers respond when the economy contracts.

Selected Hamilton Project Papers on Work Requirements and SNAP

ECONOMIC ANALYSES

“Work Requirements and Safety Net Programs”

Lauren Bauer, Diane Whitmore Schanzenbach, and Jay Shambaugh

This paper characterizes the types of individuals who would face work requirements in SNAP and Medicaid, describes what their work experiences are over a two-year period, and identifies the reasons why they are not working if they experience a period of unemployment or labor force nonparticipation. The analysis concludes that proposed work requirements would put at risk access to food assistance and health care for millions who are working, trying to work, or face barriers to working.

“Workers Could Lose SNAP Benefits Under Trump’s Proposed Rule”

Lauren Bauer

Following the announcement of a plan to reform SNAP rules, Fellow Lauren Bauer offers analysis suggesting that strict enforcement of work requirements will sanction not only those who are able to work but choose not to—but also those who are unable to work, unable to find work or prove that they have met the requirement.

ECONOMIC FACTS

“Twelve Facts about Food Insecurity and SNAP”

Diane Whitmore Schanzenbach, Lauren Bauer, and Greg Nantz

There are many factors at work in determining educational outcomes; some of these are more easily addressed by policy reforms than others, and not all can be addressed directly within the K–12 education system. To illustrate the payoffs from increasing educational attainment, the challenges faced by our nation’s K–12 schools, and the promise of targeted childhood interventions, The Hamilton Project offers the following fourteen facts on education and economic opportunity.

POLICY PROPOSALS

“Strengthening SNAP for a More Food-Secure, Healthy America”

Diane Whitmore Schanzenbach

The Supplemental Nutrition Assistance Program (SNAP)—formerly known as the Food Stamp Program—is an essential part of America’s social safety net. Diane Schanzenbach proposes five reforms that could strengthen SNAP, including incentives for participants to purchase healthier foods and improvements to the benefit formula.

“Modernizing SNAP Benefits”

James P. Ziliak

The Supplemental Nutrition Assistance Program (SNAP) provides assistance to households that lack food security, with benefit allotments determined by the USDA’s Thrifty Food Plan (TFP). However, the assumptions underlying the TFP are based on increasingly unrealistic assumptions about food preferences, time availability, and prices faced by many SNAP recipients. As a result, SNAP is less effective than it could be. In this Hamilton Project paper, James Ziliak proposes a series of reforms to the TFP aimed at strengthening nutrition assistance.

Endnotes

1. Net income is gross income minus an earnings disregard and other deductions.
2. States can also exempt individual SNAP participants. Since 1996, states may exempt up to 15 percent of the SNAP population exposed to work requirements. States have discretion with how to apply these exemptions and may bank unused exemptions. The 2018 Farm Bill reduced the annual share of SNAP participants that could receive an individual exemption from 15 percent to 12 percent and maintained state flexibility in terms of both application and accrual.
3. The Foundation for Government Accountability has published research claiming that work requirements increased employment following reimplementation in Kansas, Maine, and Florida. These pieces do not employ a research design for causal inference, do not identify treatment and control groups, and incorrectly sample the program-eligible population for study. In failing to account for participants' work histories, including concurrent participation in SNAP, these pieces incorrectly ascribe to work requirement reimposition any "increases" in employment after an individual exits the program, despite the fact that those on SNAP are frequently transitioning into employment during and after program participation when work requirements are not in effect.
4. To understand maximum eligibility, we look at county eligibility based on the county-level data as well as the LMA-level data. Because the LMAs in New England states are made up of minor civil divisions and not counties, eligibility in counties in Connecticut, Massachusetts, Maine, New Hampshire, and Vermont is only modeled on county data. We are unable to show the share of counties eligible based on state-selected geographic areas or based on the following rules: a historical seasonal unemployment rate above 10 percent; LSA designation; a low and declining employment-to-population ratio; a lack of jobs in declining occupations or industries; or, description in an academic study or other publication as an area where there is a lack of jobs.
5. A state is eligible for a work requirement waiver based on EB if a state has (1) a 13-week Insured Unemployment Rate (IUR) of at least 5 percent and 120 percent of each of the last two years; (2) an IUR of at least 6 percent; or (3) a 3-month Total Unemployment Rate (TUR) of at least 6.5 percent and 110 percent of either of the last two years.
6. During the Great Recession, Congress enacted Emergency Unemployment Compensation, a temporary program that extended the amount of time during which an eligible UI participant could retain benefits. Congress authorized EUC on June 30, 2008, extending the expiration date to January 1, 2014 (American Taxpayer Relief Act of 2012). The Bush Administration clarified on January 8, 2009 that eligibility for Emergency Unemployment Compensation (EUC) also qualified states for SNAP waivers ([USDA 2009](#)). EUC established several tiers of additional weeks of UI benefits, with each tier contingent on a state having a total unemployment rate that exceeded a given threshold. EUC tier qualifications interacted in different ways with SNAP waiver eligibility over the EUC period. Importantly, states were eligible for SNAP waivers if they were eligible for particular tiers of EUC, and not just if they took EUC (see appendix table 1 for eligibility thresholds and the interaction of SNAP waivers and EUC tiers).
7. ARRA was enacted on February 17, 2009. It stated that for the remainder of FY2009 and through FY2010 ABAWDs were waived from work requirements to maintain access to the program. While a few localities declined this authorization, every county in the United States was eligible for waiver from February 17, 2009 to September 30, 2010.
8. The data on work requirement waiver eligibility can be found [here](#). The data on county eligibility was copied by hand and duplicated by a second researcher using mapchart.net to produce a JSON, which converted the visualization into data used to produce the analyses. We did not have access to any waiver application information or to USDA-produced information regarding waiver eligibility. If any area of a county received a waiver, we counted the entire county as receiving a waiver due to an inability to be more precise. These maps are predicated on waiver take-up. We continue to be unable to identify waiver eligibility for unmodeled reasons, including those based on sub-state regional eligibility or LSAs for states that chose not to apply.