THE HAMILTON PROJECT

ECONOMIC ANALYSIS | APRIL 2020

Who Stands to Lose If the Final SNAP Work Requirement Rule Takes Effect?

Lauren Bauer, Jana Parsons, and Jay Shambaugh

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MISSION STATEMENT

The Hamilton Project seeks to advance America's promise of opportunity, prosperity, and growth. The Project's economic strategy reflects a judgment that long-term prosperity is best achieved by fostering economic growth and broad participation in that growth, by enhancing individual economic security, and by embracing a role for effective government in making needed public investments. We believe that today's increasingly competitive global economy requires public policy ideas commensurate with the challenges of the 21st century. Our strategy calls for combining increased public investments in key growth-enhancing areas, a secure social safety net, and fiscal discipline. In that framework, the Project puts forward innovative proposals from leading economic thinkers — based on credible evidence and experience, not ideology or doctrine — to introduce new and effective policy options into the national debate.

The Project is named after Alexander Hamilton, the nation's first treasury secretary, who laid the foundation for the modern American economy. Consistent with the guiding principles of the Project, Hamilton stood for sound fiscal policy, believed that broad-based opportunity for advancement would drive American economic growth, and recognized that "prudent aids and encouragements on the part of government" are necessary to enhance and guide market forces.

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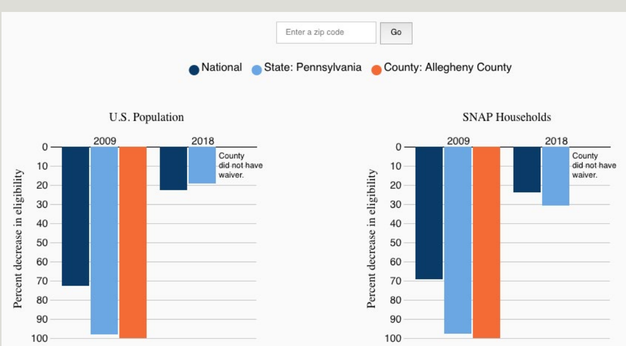

THIS REPORT ACCOMPANIES A HAMILTON PROJECT INTERACTIVE FEATURE:

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An interactive tool accompanies this economic analysis. This interactive allows users to find out how many people and SNAP households lived in places—the United States and each state and county—that would have lost the protection of a SNAP work requirement waiver during the Great Recession (in 2009) and during an expansion (in 2018) had the Trump Administration's final rule been in place.

BROOKINGS

Introduction

On April 1, 2020, a nationwide Supplemental Nutrition Assistance Program (SNAP; formerly the Food Stamp Program) work requirement suspension took effect due to the health emergency declared in response to the COVID-19 pandemic. April 1 would have been the effective date of the U.S. Department of Agriculture's (USDA) final and more restrictive work requirement waiver eligibility rule, a policy change that would have removed work requirement waivers from many places and caused roughly a million individuals to face a time limit on SNAP eligibility unless they satisfied the work requirement (USDA 2020). An injunction against the final rule in conjunction with new legislation suspending work requirements during this health emergency ensure that in the near-term, SNAP enrollment will expand as the economy contracts.

In mid-March 2020 the U.S. District Court for Washington, DC, issued a preliminary injunction against USDA, halting the implementation of its final work requirement rule.[1] This rule would have changed the economic conditions under which a state could apply for SNAP work requirement waivers. The Families First Coronavirus Response Act (Families First) suspended work requirements for the duration of the national health emergency, but the standing waiver eligibility rules will go back into effect when the health emergency is declared over. Although an appeal is not imminent as of late March 2020, the administration can still appeal the ruling and a ruling on the merits would likely occur this fall.

Had the final rule gone into effect, by USDA's estimates about 700,000 people would have lost access to SNAP benefits. By our estimate, more than 1.3 million people would have been newly exposed to time limits and potentially lost benefits.[2] Given the substantial impact on program participants that such a rule has, it is important to understand its reach even if the requirements are currently suspended to make sure proper policies are in place when the suspension ends.

Our estimate that 1.3 million people would be newly exposed to time limits by the final rule is based on enrollment patterns of able-bodied adults without dependents (ABAWDs) in SNAP prior to the outbreak of COVID-19, the disease caused by the SARS-CoV-2 coronavirus. Forthcoming data will demonstrate the extent of the damage, but the U.S. economy is almost certainly already in a recession, with millions losing their jobs in March. Given the economic upheaval currently underway, it is highly likely that more households will become SNAP eligible and enroll in SNAP. Because it is likely going to be very difficult to find employment for the foreseeable future, work requirements represent a sizable burden to maintaining program eligibility.

In our prior research modeling SNAP work requirement waivers, we looked at the share of counties that would be affected by changing the criteria for waiver eligibility (Bauer and Shambaugh 2018; Nunn, Parsons, and Shambaugh 2019). We asked, how many counties would have lost eligibility for a SNAP work requirement waiver had USDA's proposed or final rules been in place during the Great Recession?

In this economic analysis we model how many people live in places that would have lost SNAP work requirement waivers because of the final rule. Specifically, we model the share of the U.S. Population, the share of households receiving SNAP benefits, and the share of U.S. households that live in places that would have lost SNAP work requirement waiver eligibility under the Trump administration's final rule had these criteria been in place during the Great Recession (in 2009) or during an economic expansion, as recently as 2018.

The analysis that follows demonstrates the importance of the nationwide work requirement suspension, prompted by the public health crisis, that Congress passed as well as the nationwide injunction affirmed in federal court. Looking historically, we find that 73 percent of the population and 69 percent of SNAP households (including but not exclusively ABAWD households) lived in places that would have lost work requirement waivers in the depths of the Great Recession in 2009 had only the Trump administration's final work requirement rule been in place.

We again enter a period where a nationwide SNAP work requirement suspension is necessary. Without this action, millions of otherwise eligible SNAP participants would be on the precipice of losing benefits. One of the missions of The Hamilton Project is to promote policies that support economic security and a strong and inclusive safety net. SNAP serves a critical role for families and the economy in providing resources to purchase food and by serving as an engine for fiscal stimulus. When the national health emergency ends, this Economic Analysis provides evidence to policymakers of the implications of different SNAP work requirement rules.

How Would SNAP Eligibility Have Changed during the Last Decade if Different Work Requirement Rules Were in Place?

In this section we model a historical counterfactual: Who would have lost the protection of an economic condition–based SNAP work requirement waiver had the final Trump administration rule been in place from 2007 to 2018? These estimates build on prior analyses of county-level coverage we submitted to USDA in response to their notice of proposed rulemaking, and subsequent models of these waivers (Bauer, Parsons, and Shambaugh 2019a, 2019b).

In figures 1 and 2 we model the following scenarios as a share of counties and the U.S. population from 2007 to 2018:

- **Standing Rule** (purple): The purple lines in figures 1 and 2 show the existing set of eligibility standards as well as policy changes made by USDA and Congress over the course of the Great Recession to increase waiver eligibility: (1) a 3-month and a 12-month average unemployment rate of 10 percent, (2) a 24-month average unemployment rate20 percent above the national average for the same period, (3) qualifying for unemployment insurance extended benefits (EB); as well as temporary criteria added during the Great Recession, (4) qualifying for emergency unemployment compensation (EUC), and (5) qualifying under the American Recovery and Reinvestment Act of 2009 (ARRA). [3]
- **Proposed Rule** (green): The green lines in figures 1 and 2 model the set of eligibility standards for county-level work requirement waivers had the proposed rule (USDA 2019) been in place with the following criteria: (1) a 12-month average unemployment rate of 10 percent, (2) a 24-month average unemployment rate 20 percent above the national average for the same period with a 7 percent unemployment rate floor, and (3) qualifying for EB.
- **Final Rule** (orange): The orange lines in figures 1 and 2 model the set of eligibility standards for counties in eligible labor market areas (LMAs) for work requirement waivers had the final rule been in place with the following criteria: (1) a 12-month average unemployment rate of 10 percent, and (2) a 24-month average unemployment rate 20 percent above the national average for the same period with a 6 percent unemployment rate floor.[4] A crucial difference between the proposed rule and the final rule was the removal of qualifying for EB as a means of qualifying for the waivers.

The accompanying interactive models the difference between the standing rule and the final rule at two points in time, 2009 and 2018. The interactive shows the share of the total population and the share of SNAP households nationally, in a state, or in a county, who would have lost the protection of a work requirement waiver had the final rule and not the standing rule been in place at the time. Due to limited data availability, the interactive and the figures do not show an estimate for the number of ABAWDs who would have been exposed to a work requirement had waiver rules been different.

WHICH COUNTIES LOSE SNAP WORK REQUIREMENT WAIVERS UNDER VARIOUS SCENARIOS?

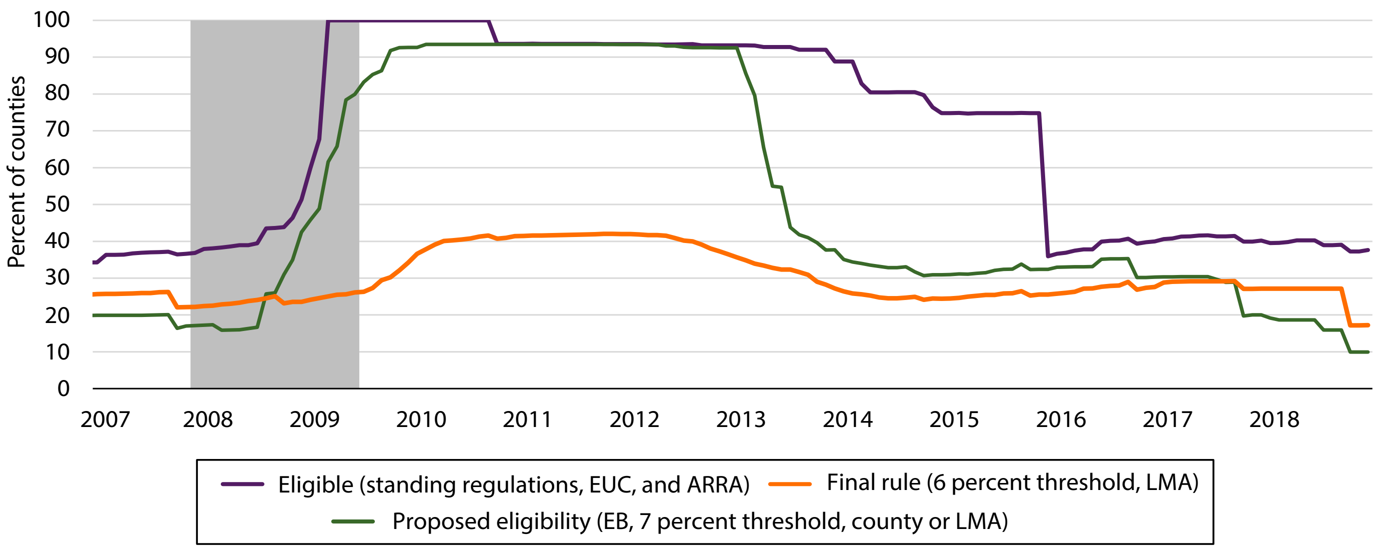
Figure 1 models eligibility for work requirement waivers from 2007 through 2018 for *counties.* We do not model changes to eligibility among ad hoc substate geographic areas nor to the newly restricted time period for data.

Notable in this analysis are the differences in the share of counties that are eligible under the Trump administration's proposed rule versus the final rule. Because the unemployment rate floor is lower in the final rule (6 percent) than in the proposed rule (7 percent), more counties are eligible both before the Great Recession and late in the recovery under the final rule than they are in the proposed rule. But because eligibility is no longer tied to qualifying for EB and because only LMAs qualify, the final rule drastically limits the number of counties that would have been eligible for a work requirement waiver during the Great Recession.

At the onset of the Great Recession (shaded gray in figure 1), neither the standing rules, the proposed rule, nor the final rule provided the extent of coverage that the combination of standing rules, the Bush and Obama administrations, and congressional action permitted. That is, the Bush and Obama administrations and Congress took actions to extend waivers because the standing rules were too slow to do so. While the final rule would have allowed for slightly more waivers than the proposed rule through 2008, it would have in effect destroyed the countercyclicality of SNAP, with waivers never being granted to more than 40 percent of counties throughout the duration of the recession.

FIGURE 1.

Counties Eligible for ABAWD Work Requirement Waiver under Various Scenarios, 2007–18



Source: Local Area Unemployment Statistics (LAUS; Bureau of Labor Statistics [BLS] 2000–18b); EB and EUC trigger notices (Department of Labor [DOL] n.d.; BLS (2000–18a); authors' calculations.

Note: "EUC" refers to UI Emergency Unemployment Compensation, "EB" refers to UI Extended Benefits, and "LMA" refers to Labor Market Area. New England counties that are part of more than one LMA are considered eligible if they are part of at least one eligible LMA.

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Effective countercyclical policy would waive the work requirements as soon as a recession begins. None of the policies—standing, proposed, or final—do so. The proposed rule would waive work requirements more slowly and cover a smaller population than the standing rules, and the final rule more slowly and a smaller population still. With both the Great Recession and COVID-19, it has taken an act of Congress to ensure a widespread work requirement suspension at the onset of a downturn.

WHO LOSES ACCESS TO SNAP WHEN PLACES ARE NO LONGER ELIGIBLE FOR A WORK REQUIREMENT WAIVER?

Only ABAWDs face a time limit for SNAP eligibility for failing to meet a work requirement, but we do not have sufficient data on the age, dependent status, and disability status by county needed to model the share of ABAWDs who would be exposed to time limits under different waiver assumptions. The analysis that follows and that is shown in the accompanying interactive differentiates between the number of counties, the size of the population in those counties, and the share of households receiving SNAP benefits in those counties. This analysis does not indicate the exact number of ABAWDs who would have or would face a time limit.

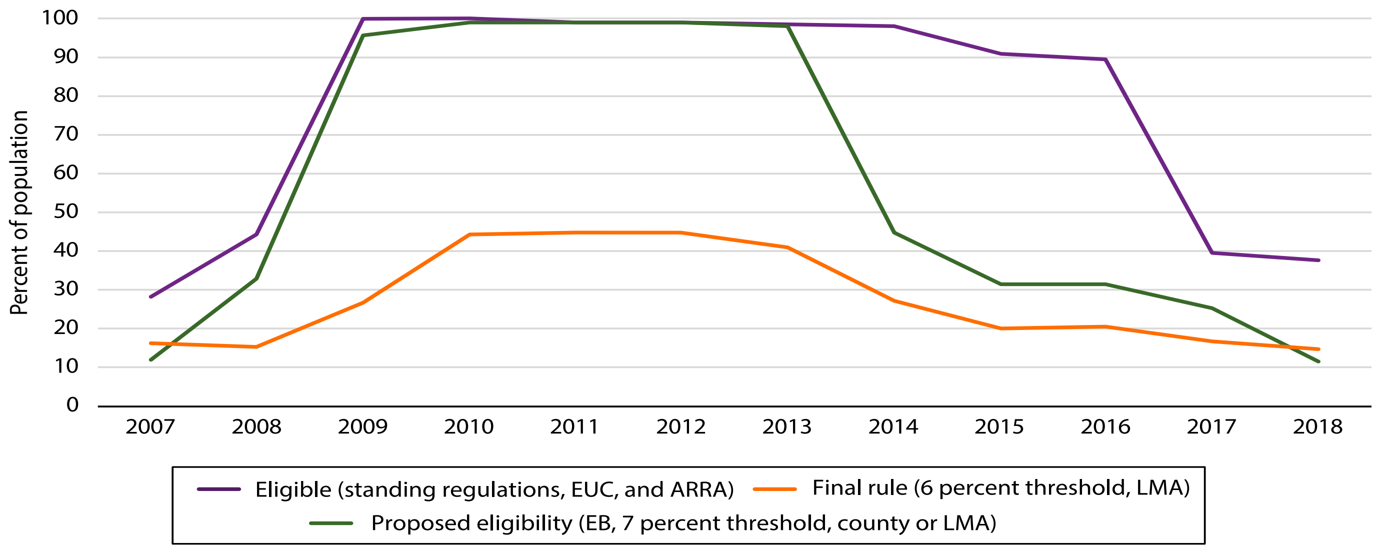
Figure 2 models eligibility for work requirement waivers from 2007 to 2018 for the total U.S. population; while figure 1 is monthly, figure 2 shows one data point per year.[5] The accompanying data interactive shows the share of the U.S. population and SNAP households that lived in places losing waiver eligibility in 2009 and 2018; we discuss the national numbers from the data interactive here.

Because of the nationwide SNAP work requirement suspension included in ARRA, waivers were available to 100 percent of the population under the standing rules in 2009. Had the proposed rule been in place in 2009, 293.6 million people would have lived in a county that was eligible for a work requirement waiver. This corresponds to 95.6 percent of U.S. households and 96.0 percent of SNAP households (not shown in figure 2; SNAP households shown in the interactive).[6] Had the final rule been in place in 2009, only 83.8 million people would have lived in a place eligible for a work requirement waiver (corresponding to 26.8 percent of U.S. households and 30.9 percent of SNAP households). Under the final rule, only a small portion of the population is granted waivers as the economy deteriorates; the final rule effectively ends the countercyclicality of SNAP work requirement waivers.

Comparing the share of the U.S. population living in places losing eligibility (73 percent) under the final rule to the share of counties losing eligibility (71 percent) under the final rule in 2009, we see that a slightly higher share of the population

FIGURE 2.

Percent of Population Living in Areas Eligible for ABAWD Work Requirement Waiver under Various Scenarios, 2007–18



Source: U.S. Population: Population Estimates Program, U.S. Census Bureau 2000–18; county-level waiver eligibility: LAUS, BLS (2000–18b); EB and EUC trigger notices (DOL n.d.); BLS (2000–18a); authors' calculations.

Note: "EUC" refers to UI Emergency Unemployment Compensation, "EB" refers to UI Extended Benefits, and "LMA" refers to Labor Market Area. For the final rule, eligibility in New England is based on the individual components of the LMA. Monthly county-level eligibility triggers are annualized to the fiscal year. If a county is eligible for a waiver for any month within a fiscal year, then it is eligible for the entire fiscal year.

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lives in the counties that would have lost eligibility (authors' calculations). This indicates that the places that would have lost eligibility in the wake of the Great Recession are slightly more densely populated. In 2018, however, the opposite was true. A higher share of counties (23 percent) than people living in those counties (14 percent) would have lost eligibility had the final rule been in effect. This shows that the counties that would have been affected by the final rule in 2018 are more rural than those that would not have been affected.

There are other differences in the demographics of counties that would have lost waiver eligibility. In both 2009 and 2018 the counties that would have lost eligibility under the final rule had substantially higher shares of Black and non-white populations than both the overall population and the population of counties that maintained eligibility (authors' calculations).

WAIVER ELIGIBILITY AMONG SNAP HOUSEHOLDS IN STATES

The accompanying data interactive allows users to see how the Trump administration's work requirement waiver rule would have affected people in their states, down to their zip code. In this section we highlight a point-in-time estimate of state-level waiver eligibility losses among SNAP households at the height of the Great Recession (in 2009; exact estimates can be found using the accompanying interactive). We pair this analysis with examples that states provided in federal court regarding the populations that would be affected in 2019.

The distribution of those losing eligibility is not spread evenly across the country. The map of the United States in figure 3 shows the share of SNAP households in each state that resided in places losing SNAP work requirement waiver eligibility in 2009. Again, every ABAWD household is a SNAP household, but not every SNAP household is an ABAWD household. This map illustrates that households receiving SNAP across the country would have faced drastically different waiver availability (and work requirements) depending on where they lived. At the nadir of the Great Recession, broad swaths of the American Midwest and the Mid-Atlantic would have seen material increases in exposure to work requirements, with between 90 and 100 percent of SNAP households living in places that would have lost eligibility for waivers from work requirements under the final rule.

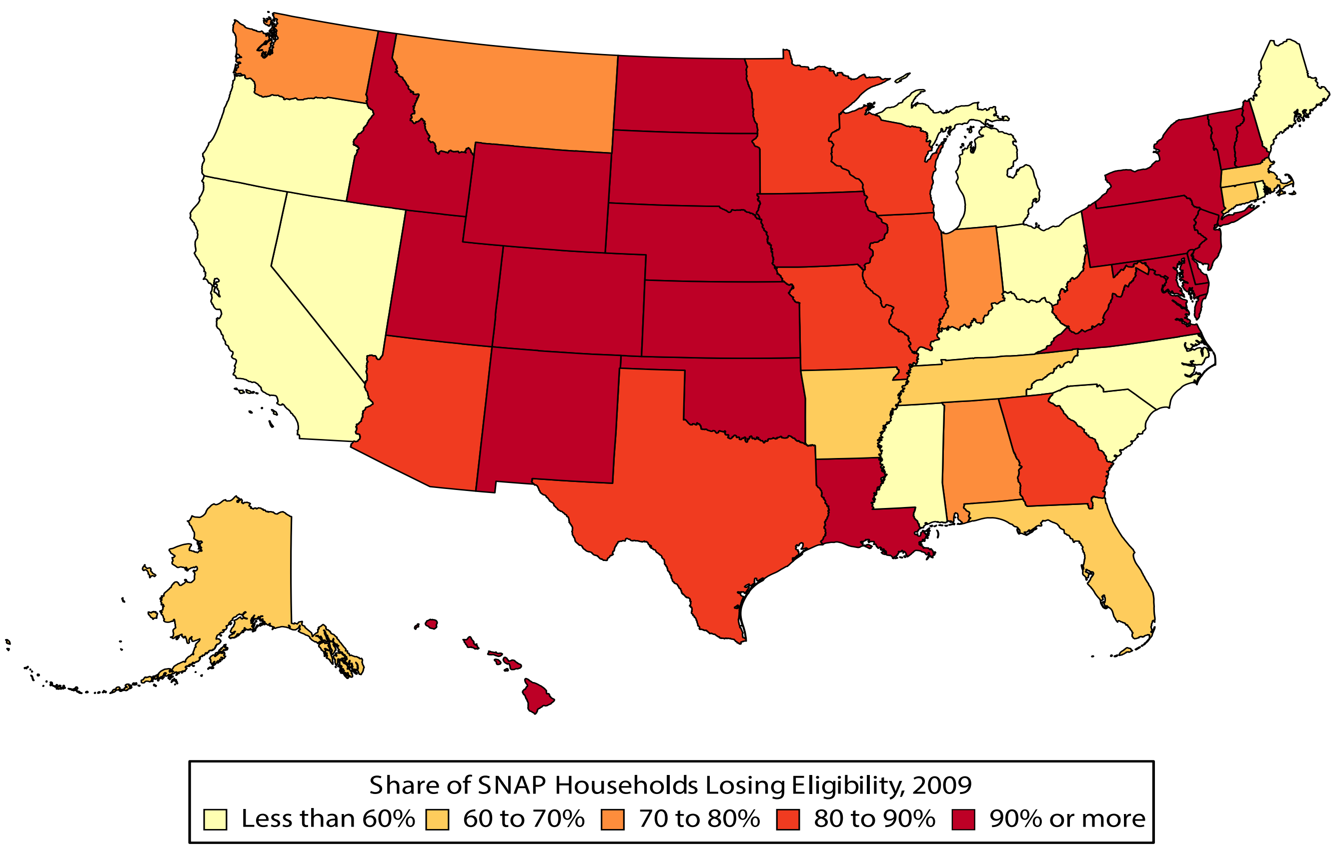
Figure 3 shows high levels of eligibility loss in 2009 by state; in 2020 some states with waivers sued USDA to stop the implementation of its final work requirement waiver eligibility rule.[7] In doing so, those states provided a state-by-state portrait of who would have been affected by the rule. In that lawsuit 14 states, Washington, DC, and New York City described who would be harmed today by the imposition of the final work requirement rule and how aspects of the rule would produce inconsistent and unexpected results when applied to different places across the country. For example, in New York City 30 percent of ABAWDs lacked a permanent address and 4 percent lived in homeless shelters; in Minnesota, 22 percent of ABAWDs were homeless. Massachusetts reported that those losing access would be veterans, the formerly incarcerated, victims of domestic violence, those aging out of the foster care system, and those with mental health and other disabilities.

Furthermore, conditioning waivers on eligibility at the LMA level would affect both urban and rural areas. Take, for example, Washington, DC, and Connecticut. By allowing waivers only at the LMA level, more urban areas with high levels of unemployment (e.g., Washington, DC or Bridgeport, Connecticut) would be grouped with areas of low unemployment (e.g., Maryland and Virginia; or Greenwich and Darien, Connecticut). The areas that have high unemployment and that are in need of work requirement waivers would lose waiver eligibility. By contrast, in the state of Oregon, the majority of those losing waivers live in rural and/or agricultural areas.

These examples are consistent with our calculations. Median household incomes tended to be higher and percent in poverty tended to be lower in counties that would have lost eligibility. However, as noted above, economic conditions of the ABAWD population are often different from local economic conditions. ABAWDs tend to have more unstable work situations (Bauer, Schanzenbach, and Shambaugh 2018) or face barriers to employment (Bauer and Shambaugh 2018; Nunn, Parsons, and Shambaugh 2019). Furthermore, by choosing a large geographic area as the unit of analysis—LMAs—smaller locations with especially weak economic conditions were averaged together with stronger locations.

FIGURE 3.

Share of SNAP Households That Would Have Lost Eligibility in 2009



Source: SNAP Households: American Community Survey, U.S. Census Bureau 2007–11; county-level waiver eligibility: LAUS, BLS (2000–18b); EB and EUC trigger notices (DOL n.d.); BLS (2000–18a); authors' calculations.

Note: SNAP household data are from the ACS five-year file. These data are used in order to assign households to counties, which are only available using the five-year files. We centered the data in order to get the focal year for the Great Recession (2009). Bins are closed on the left and open on the right.

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Conclusion

SNAP is a critical automatic stabilizer and safety net program. Work requirements are a material impediment to SNAP's countercyclical expansion unless they are waived expeditiously. As our research has shown, the final rule would weaken SNAP's ability to expand its rolls during an economic downturn, consequently destabilizing households and the economy as a whole. For now, the final rule will not be in place when the Families First national work requirement suspension ends; but, the standing rules are also not sufficiently responsive to rapidly changing economic conditions.

A Hamilton Project policy proposal by Hilary Hoynes and Diane Whitmore Schanzenbach (2019) and proposals for the food security response to COVID-19 by Bauer and Schanzenbach (2020) make new recommendations regarding ways to link work requirement waivers to economic conditions. These recommendations would improve waiver eligibility criteria in order to improve SNAP's countercyclical response.

In addition to using its discretion to enact work requirement waivers, Congress should consider making additions to the "lack of sufficient jobs" evidence:

- **National:** A nationwide work requirement suspension would go into effect (or maintain an enacted waiver) when the Sahm recession indicator (Sahm 2019) triggers on. This waiver would sunset a year after the Sahm recession indicator turns on or when the three-month moving average of the national unemployment rate falls to within 2 percentage points of the prerecession level, whichever comes later.
- **State:** State-wide work requirement waivers would go into effect when Congress authorizes EUC and would sunset two years past the final date in which EUC is effective in the state. The link to EB (that was removed from the proposed rule to the final rule) should be maintained for statewide waiver eligibility.

During difficult economic times SNAP alleviates hardship and stimulates the economy by subsidizing food consumption; at the depths of the Great Recession, SNAP provided resources to purchase food for one out of every six Americans (Hoynes and Schanzenbach 2019). While we do not yet know how the COVID-19 pandemic will shape the economy in the coming weeks, months, and years, a nationwide SNAP work requirement suspension can only help the country and its most vulnerable households to weather this crisis.

Endnotes

1. District of Columbia, et al. v. U.S. Department of Agriculture, et al., Civil Action No. 20-119 (2020).
2. From January to March 2020 Hamilton Project staff submitted Freedom of Information Act requests to each state that had a statewide or partial work requirement waiver in 2019 requesting the number of ABAWDs the state was projecting would be newly subject to a time limit in April 2020. Staff also documented public reporting, whether a state's website or a news source, to ascertain the number of current SNAP program participants who would be newly exposed to time limits in April 2020.
3. We model waiver eligibility based only on economic conditions and not whether a state declined to apply for a waiver for an otherwise eligible area.
4. A Labor Market Area (LMA) is a geographic unit that describes an economically integrated area in which people "can reside and find employment within a reasonable distance or can readily change jobs without changing their place of residence" (Bureau of Labor Statistics 2020).
5. Because of data limitations, we aggregate the county trigger data to the fiscal year to get an annual estimate of the share of the population (Census Bureau annual estimates) living in counties that will lose waiver eligibility under various scenarios.
6. For the estimates of waivers by county, we follow our analysis above. To estimate the number of SNAP and U.S. households we use pooled five-year ACS data, 2007–11, centered on 2009; and 2014–18, centered on 2018. The pooling over five years in the ACS does matter; our estimates of households falling into the gap would be smaller in the second period if we were just looking at 2017–18 and not 2014–18. The estimates for waivers are not affected by the pooling—only the estimates of the number SNAP households in a county when a waiver is granted are affected.
7. District of Columbia, et al. v. U.S. Department of Agriculture, et al., Civil Action No. 20-119 (2020).

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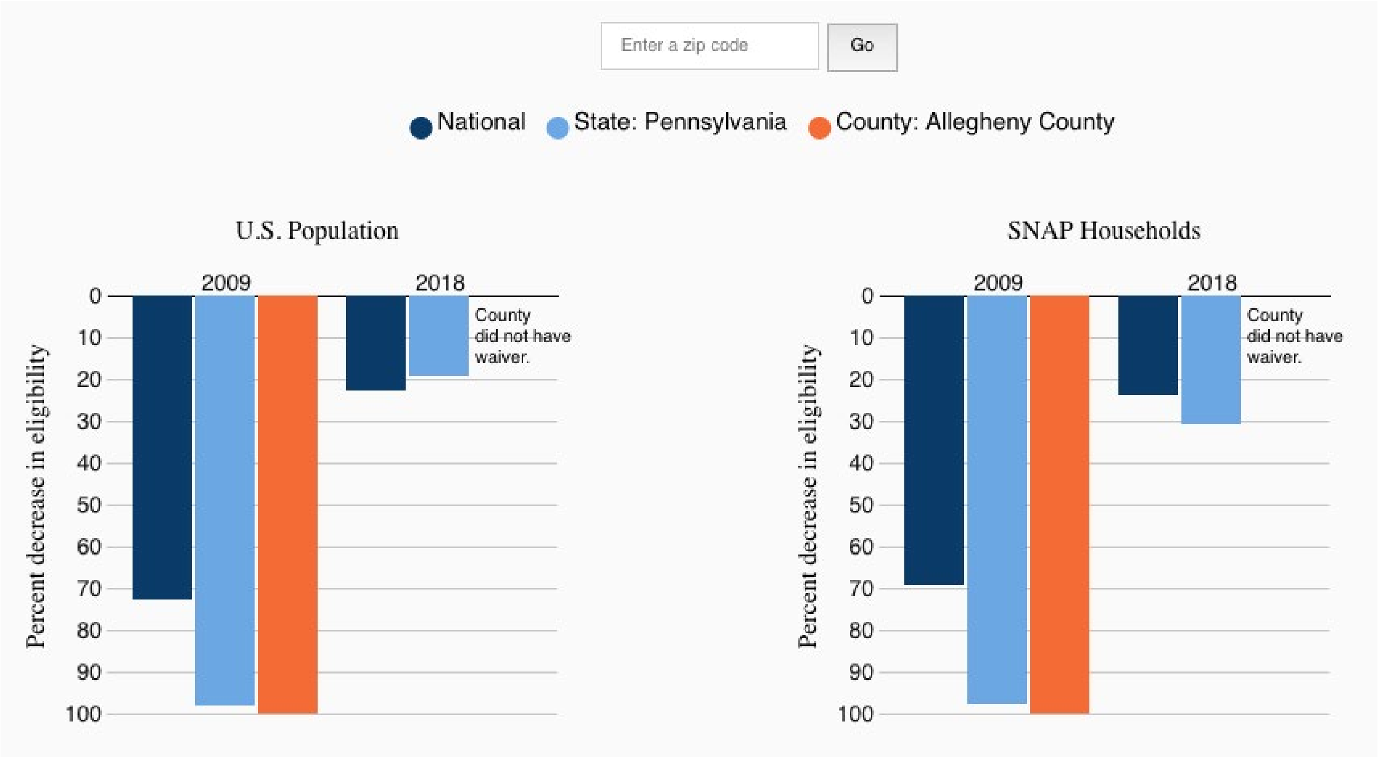

Source: U.S. Population: Population Estimates Program, U.S. Census Bureau 2000–18; SNAP Households: American Community Survey, U.S. Census Bureau 2007–11, 2014–18. County-level waiver eligibility: Local Area Unemployment Statistics, Bureau of Labor Statistics (2000–2018); Extended Benefits and Emergency Unemployment Compensation trigger notices (Department of Labor n.d.); Bureau of Labor Statistics (2000–2018); authors' calculations.

Note: Estimates of SNAP households come from pooled 5-year American Community Survey data for 2009 (2007–11 data) and 2018 (2014–18 data). County-level eligibility data are for 2009 and 2018. New England counties which are part of more than one Labor Market Area (LMA) are considered eligible if they are part of at least one eligible LMA. Monthly county-level eligibility triggers for a calendar year are annualized on a fiscal year basis. If a county is eligible for a waiver for any month within a fiscal year, then it is eligible for the entire fiscal year.

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