

National Skills Coalition

Comments on Supplemental Nutrition Assistance Program: Requirements and Services for Able-Bodied Adults Without Dependents

(RIN 0584-AE57)

April 2018

National Skills Coalition — a broad-based coalition working toward a vision of an America that grows its economy by investing in its people so that every worker and every industry has the skills to compete and prosper - is pleased to submit comments responding to the U.S. Department of Agriculture’s Advanced Notice of Proposed Rulemaking (RIN 0584-AE57) published in the Federal Register on February 23, 2018.

NSC has long supported expanded access to high-quality education and training opportunities for individuals receiving Supplemental Nutrition Assistance Program (SNAP) benefits, and in particular has worked with a range of national, state, and local partners to call for policies that modernize and strengthen the SNAP Employment and Training (SNAP E&T) program.¹ In an economy where the vast majority of jobs will require some form of postsecondary education, we believe that only through dedicated investments in job training and other work supports will we be able to move work-eligible SNAP participants into sustainable, family-supporting careers.

The Agriculture Act of 2014 (P.L. 113-79) made a number of key policy changes to help improve the SNAP E&T program, including restoring state administrative grants to historic levels of \$90 million; establishing new performance reporting measures to evaluate the effectiveness of SNAP E&T programs in helping participants achieve employment, earnings, and credential attainment goals; and authorizing \$200 million in funding for pilot grants to states to expand skills-based education and training opportunities. USDA’s Food and Nutrition Service (FNS) has built on these important policy changes by increasing its technical assistance capacity to help states develop SNAP E&T programs that utilize partnerships with community colleges, employers, and others to help SNAP participants can earn postsecondary credentials with value in the labor market. NSC believes that these critical improvements to federal and state administration of the SNAP E&T program represent an important turning point in our nation’s antipoverty strategy, reorienting away from an outdated “work-first” model that has done little to support long-term employment for low-income workers, and instead focusing on a skills-centered approach that more accurately reflects the demands of today’s labor market.

¹ <https://www.nationalskillscoalition.org/resources/publications/file/NSC-SNAP-ET-recommendations.pdf>

With that in mind, we are deeply concerned with proposed ANPRM, and the clear signals that FNS may be retreating from some of the valuable lessons learned about quality employment and training programs under SNAP E&T. The ANPRM highlights the current process by which states can request waivers to the time limits and work requirements for Able-Bodied Adults without Dependents (ABAWDs) and suggests that states may be utilizing waivers in ways that do not strengthen the goal of helping SNAP recipients find and keep work when jobs are “sufficiently available.” However, we believe the framing of questions around limiting ABAWD waivers is based on an erroneous set of assumptions about the barriers between “able-bodied” adults and meaningful employment.

Simply being “able-bodied” is insufficient to secure a meaningful and sustainable career in today’s economy. More than 80 percent of jobs nationally require some form of education and training beyond a high school diploma.² Yet, approximately 50 percent of long-term SNAP recipients have less than a high school diploma, and fewer than 30 percent have any education beyond the secondary level, meaning that many are unable to qualify for well-paying jobs – or even enter into training programs that could help them get the necessary skills and credentials demanded by the labor market. Most non-disabled, working-age SNAP recipients do work³ - albeit in jobs that often do not pay sufficient wages, or offer enough hours, to move off of SNAP - but for the minority of those who do not, educational attainment gaps are likely a significant barrier to careers that provide a pathway out of poverty. A focus on rapid labor market attachment without a corresponding emphasis on upskilling opportunities for individuals subject to tighter work requirements will almost certainly lead to reductions in the number of ABAWDs eligible for SNAP, but will do little to address the “skills gap” that U.S. businesses are facing or to increase economic opportunities for SNAP recipients.⁴

Despite the strong economy, it is also unclear whether there are sufficient employment opportunities to support tighter restrictions on ABAWD flexibility. According to one recent estimate, in Fiscal Year 2016 there were between 9.5 million and 11 million non-disabled individuals between the ages of 18-59 who received SNAP benefits and reported no earnings.⁵ However, there were only 6.3 million job openings in January 2018, according to the Department of Labor.⁶ Even if each of those jobs could be immediately filled by an ABAWD – an unrealistic assumption given the likely mismatches between participant skills and available job opportunities - there would still be a significant number of individuals subject to work requirements who would be unable to find placements based on current labor market demand.

Rather than focusing on limiting ABAWD waivers to prematurely “push” people into the labor market (and by extension, off public assistance), we recommend that FNS continue to focus on expanding support to states for policies that “pull” people into the labor market who are ready

² <https://www.nationalskillscoalition.org/resources/publications/2017-middle-skills-fact-sheets/file/United-States-MiddleSkills.pdf>

³ <https://www.cbpp.org/research/food-assistance/most-working-age-snap-participants-work-but-often-in-unstable-jobs>

⁴ We have seen this dynamic at work before. Following the Great Recession, waivers from the ABAWD time limits expired across a number of states, leading to as many as 500,000 people losing nutrition assistance in 2016. There is little evidence that the time limit led to increased employment for those individuals affected.

⁵ https://edworkforce.house.gov/uploadedfiles/testimony_doar_3.15.18.pdf

⁶ <https://www.bls.gov/news.release/jolts.htm>

to participate. As referenced in question two of the request for comment, FNS can use its existing authority and resources to support ABAWDs as they transition to meaningful work. Accordingly, we offer the following recommendations for strengthening these efforts:

Focus on skills-based SNAP E&T efforts including SNAP to Skills and the pilot program to help ABAWDs qualify for meaningful employment.

The Department has already made significant strides in helping SNAP recipients move out of poverty in positive, sustainable ways. In 2015, the Secretaries of the Departments of Agriculture and Labor announced \$165 million in grants to 10 states as part of the SNAP E&T pilot program authorized by the 2014 Farm bill. The pilot intends to test a range of strategies for helping SNAP participants find jobs, increase their earnings, and reduce their reliance on public assistance. The Department should analyze the independent evaluation of the pilot program's impact on employment and earnings to help determine the most effective strategies for helping ABAWDs progress along the pathway out of poverty.

Also, in 2016, FNS launched its SNAP to Skills project to provide technical assistance, tools, and resources to states looking to use their SNAP E&T programs to train participants for in-demand jobs. This technical assistance is critical to helping states develop the capacity to transition for a program focused on job search assistance to one focused on pathways to in-demand credentials and careers.

FNS has particularly focused on assisting states transition to voluntary participation in SNAP E&T, which appears to be an important tool for ensuring that E&T programs are engaging individuals at the right time and in the right way. Adopting stricter time limits on ABAWDs would run counter to this effort, likely undermining the success of voluntary programs by pushing large numbers of underprepared workers into training or other activities designed not to lead to work, but primarily to maintain benefit eligibility.

To achieve its goal of connecting ABAWDs to meaningful work, the Department should continue to focus its efforts on these skills-based SNAP E&T initiatives. The Department should not abandon the integral work of building skills to help move people to the middle class by shifting its emphasis to geographically expand ABAWD restrictions. To reach our poverty-reduction goal, we must address people's actual barriers to obtaining family-supporting jobs.

Expand employment opportunities for ABAWDs through work-based learning.

Apprenticeship and other work-based learning strategies are among the most effective models for equipping workers with in-demand skills that can help them progress along the sustainable path out of poverty. Work-based learning strategies combine paid on-the-job experiences with classroom instruction.

Congress has recognized the importance of these strategies in the Workforce Innovation and Opportunity Act (WIOA) by calling for the automatic designation of registered apprenticeships as eligible training providers and by requiring a minimum percentage of local youth training dollars be spent on paid work experience. President Trump also released an executive order in June 2017 requiring new efforts to make apprenticeship available for a range of industries and workers.

The Department can encourage more ABAWDs to participate in work-based learning by specifically encouraging apprenticeship and other work-based learning as eligible activities under SNAP E&T and as qualifying activities for the participation requirements necessary to maintain SNAP eligibility for ABAWDs. The Department could issue guidance on how SNAP E&T funds can be used to support participation in apprenticeship and other work-based learning models, and could work with the Departments of Labor and Education to identify strategies that help SNAP agencies and service providers connect with apprenticeship programs more effectively, including through the development and implementation of pre-apprenticeship programs that allow low-skilled individuals to obtain the necessary basic skills instruction and barrier remediation that can support successful transitions into these proven workforce strategies.

Analyze reported outcome measures for the ABAWD subpopulation where available and promote effective SNAP E&T strategies for moving these participants out of poverty.

The 2014 SNAP reauthorization adopted new reporting measures that allowed states to track employment, earnings, and program completion rates for participants in SNAP E&T activities. Reporting employment, earnings, and credential attainment outcomes specifically for ABAWDs will provide valuable information on the ability of different SNAP E&T strategies to help lift participants out of poverty.

Where available, the Department should analyze program data disaggregated based on ABAWD status and work with SNAP E&T providers to determine the most successful strategies for helping strengthen economic security among the ABAWD population. Instead of focusing on a time limit that has been unsuccessful in increasing economic security, the Department can promote data-driven strategies to achieve its ultimate goal of helping SNAP recipients move out of poverty.

With the Agriculture Act of 2014 due to expire later this year, we would also encourage the Department to work with Congress to support statutory changes to the SNAP E&T program that would support greater access to quality education and training, including increasing funding levels for SNAP E&T and eliminating the separate ABAWD time limits. These changes would build on the important improvements under the 2014 reauthorization and allow FNS to expand assistance to states as they develop and implement skills-based SNAP E&T programs.

NSC appreciates the opportunity to provide comments, and we look forward to working with the Department and Congress to ensure that SNAP participants continue to have access to meaningful employment and career opportunities.