

Who Killed Work Requirements for SNAP in the Farm Bill?

Answer: Conservative Ideologues

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January 1, 2019

In “The farm bill: On SNAP, Congress chooses welfare over work once again,” Robert Doar of the American Enterprise Institute (AEI) laments the failure of Congress to pass a farm bill with meaningful new work requirements for the Supplemental Nutrition Assistance Program (SNAP).² He sees this as a “missed opportunity” and affixes blame on “opponents” of work requirements:

Those who oppose these efforts should understand that they are turning a blind eye toward the millions of poor Americans who have come to learn that SNAP only gives them an EBT card but does not help them escape poverty through earnings from work.³

Doar’s statement, however, presupposes that the farm bill’s work requirements – developed by the House Agriculture Committee – are a sound basis for moving forward. In fact, an objective and evidence-informed analysis suggests they are unreasonable (for recipients), unrealistic (for states), and not based on credible evidence about work programs that would help individuals “escape poverty.” Some who oppose “this” effort, like myself, do not object to work requirements *per se*, but rather to the House bill’s specific approach because it is designed to cut caseloads and costs – not provide a “hand up” to needy individuals.

The House Bill in a Nutshell

The House farm bill would have required able-bodied adults between the ages of 18 and 59 without a child under 6 to work or participate in a work program for at least 20 hours per week (80 hours per month) in exchange for a benefit of about \$150 to \$185 a month. Failure to meet the bill’s work requirements would have resulted in a one year loss of benefits for the first infraction and three years for a subsequent one.⁴ Individuals could regain their eligibility only by working at least half-time for a month or by qualifying for an exemption (e.g., a qualifying disability). In addition, the bill would have provided \$7.3 billion over 10 years to fund work and training activities.

Unreasonable, Unrealistic, and NOT based on Evidence

While *well-designed* work requirements can be a useful policy tool, they should be reasonable (for recipients), realistic (for states), and based on credible evidence about effectiveness. A work requirement like the one proposed for SNAP by the House Agriculture Committee does not meet any of these criteria.

Unreasonable. For recipients, the bill would have required 80 hours of participation for a benefit of about \$150 to \$185 a month, essentially requiring recipients to value their time at \$2 an hour. This requirement is considerably harsher than the current rule for able-bodied adults without dependents (ABAWDs), where the hours of participation in a workfare or community

service program can be based on the SNAP allotment divided by the minimum wage – resulting in a weekly requirement of about 6 hours. Robert Rector of The Heritage Foundation, an ardent proponent of work requirements, initially expressed an important reservation about the proposal, particularly the unreasonableness of its hourly requirement by saying that it was easy to “defend” the current requirement “because I could say it only asked for six hours of community service, but it has to be proportionate. The idea here is not to punish these people.”⁵

Rector also raised concerns about the minimum duration of the sanction in the bill – an entire year for the first infraction and three years for subsequent ones:

That’s exactly what you don’t want to do. You want to have a work program where it’s very firm but it’s very forgiving: If you didn’t do what you were supposed to do last month, okay, we’re not going to give you the benefit, but if you want to do the right thing this month we’ll put you back on the rolls.⁶

The most likely result of the House farm bill’s work requirements would be that many recipients would choose not to comply due to the unreasonableness of the requirement and accept the sanction. This would reduce caseloads and costs, but would do nothing to promote their employability. This approach is similar to TANF’s requirements, which require 130 hours a month for a relatively small benefit; this is undoubtedly one factor that explains the sharp drop in participation among eligible families, from about 78.9 percent in 1996 to just 26.3 percent in 2015.⁷ (TANF’s block grant structure is the other major factor responsible for the caseload decline, as states can then use TANF funds to fill budget holes.)

Unrealistic. The House bill would have required states to provide work, training, or education slots for over 3 million adults (ignoring the fact that states are nowhere near serving this number now) and it did not provide anywhere near the funding to provide a meaningful level of services. Ed Bolen and his colleagues at the Center on Budget and Policy Priorities explain:

Research shows that employment and training opportunities like the ones the Chairman has cited can cost \$7,500 to \$14,000 per participant. Even less intensive TANF work programs cost substantially more than the bill would provide. Current per-person costs for work and assessment activities for TANF program participants subject to work requirements in the median state in 2016 were nearly \$5,000 per year. If at least 3 million SNAP beneficiaries per month needed work slots, and costs mirrored those in TANF, it would cost more than \$1.2 billion per month to provide such employment services. That translates to almost \$15 billion a year or \$150 billion over ten years.

By contrast, the House bill dedicates \$7.3 billion over ten years in new federal grant funding (financed by benefit cuts) for the work program, or less than \$30 per participant per month if 3.4 million people need work slots.⁸

There is simply no precedent for enacting work requirements on this scale, particularly with such limited funding. TANF’s work requirements are a cautionary tale; its 50 percent work rate requirement has required states to engage well under the 3.4 million that would need work slots under House SNAP proposal, but instead of building large-scale work programs, states

responded by cutting families off the rolls or in engaging in a wide range of gimmicks to meet the work requirements. If conservatives are serious about wanting to provide a “hand up,” they should provide adequate funding and a realistic approach – one that does not rely mainly on sanctions.

Not Evidence-based. There is no credible evidence to suggest that the specific work requirements developed by the House Agriculture Committee would “work.” In fact, they are not likely to do much in the way of promoting employment and could push millions of families/individuals deeper into poverty. Indeed, this very concern led policymakers to provide \$200 million in the 2014 farm bill for 10 state demonstration projects to test various work program models. The projects are being evaluated rigorously and could provide some information regarding work program models, but the fact of that matter is that even with the results of these demonstrations, there is little evidence about the most effective policies for SNAP recipients.

Given the TANF experience, and the limited evidence about effective approaches for the populations that would be subject to these work requirements, a much better approach was outlined in an AEI debate between Heather Hahn of the Urban Institute and Ron Haskins of the Brookings Institution (also considered the “architect” of the 1996 welfare reform) – “Do work requirements work?”⁹ Both agreed that it was important to go slow, begin with modest and realistic work requirements, provide funding to implement work requirements, and carefully evaluate both implementation and outcomes. This is the approach Congress should have followed.

Conclusion

If Robert Doar and other conservative ideologues are serious about helping SNAP recipients “escape poverty through earnings from work,” they should begin by promoting experimentation of adequately funded work programs to make a case that such programs can indeed increase the employment and earnings of participants. Instead, by insisting on an unreasonable, unrealistic, and untested approach similar to the failed TANF model, the final bill had no new work requirements. They have only themselves to blame for “turning a blind eye” toward millions of poor Americans.

¹ The views in this document reflect my own as a citizen and do not reflect the views of any organization I am now or have ever been affiliated with. By way of background, I consider myself a conservative and have worked on welfare issues for The Heritage Foundation, American Enterprise Institute, and the White House under both President Reagan and President George H.W. Bush.

² Robert Doar, “The farm bill: On SNAP, Congress chooses welfare over work once again,” November 30, 2018, available at: <http://www.aei.org/publication/the-farm-bill-on-snap-congress-chooses-welfare-over-work-once-again/>.

³ Robert Doar, “The farm bill: On SNAP, Congress chooses welfare over work once again,” November 30, 2018, available at: <http://www.aei.org/publication/the-farm-bill-on-snap-congress-chooses-welfare-over-work-once-again/>.

⁴ The adult could only regain eligibility by becoming employed for at least 20 hours per week or becoming exempt, e.g., for age or disability.

⁵ Robert VerBruggen, “Welfare Reform 2.0,” The National Review, April 26, 2018, available at: <https://www.nationalreview.com/magazine/2018/05/14/republicans-welfare-reform-efforts-improve-food-stamps/>.

⁶ Robert VerBruggen, “Welfare Reform 2.0,” The National Review, April 26, 2018, available at: <https://www.nationalreview.com/magazine/2018/05/14/republicans-welfare-reform-efforts-improve-food-stamps/>.

⁷ U.S. Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation, *Welfare Indicators and Risk Factors: Seventeenth Report to Congress*, May 4, 2018, p. A-11, available at: <https://aspe.hhs.gov/system/files/pdf/259196/WELFAREINDICATORS17THREPORT.pdf>.

⁸ Ed Bolen, Lexin Cai, Stacy Dean, Brynne Keith-Jennings, Catlin Nchako, Dorothy Rosenbaum, and Elizabeth Wolkomir, “House Farm Bill Would Increase Food Insecurity and Hardship,” July 30, 2018, available at: <https://www.cbpp.org/sites/default/files/atoms/files/4-16-18fa.pdf>.

⁹ Ron Haskins and Heather Hahn, “Can Work Requirements in Safety Net Programs Work?” American Enterprise Institute, “Poverty and Social Policy Debate Series: Federal Work Requirements,” 2018, available at: www.aei.org/spotlight/federal-work-requirements-debate/.