

THE SNAP TIME LIMIT DOESN'T WORK. HERE'S WHY.



The Supplemental Nutrition Assistance Program, or SNAP, is a federally funded, state-operated program that provides essential nutritional support to 42 million low-income people in the US (1.9 million in Pennsylvania) each month.^{1,2,3} Reauthorized as part of the Farm Bill every five years, the program has been shown to reduce poverty and food insecurity, improve health outcomes, and generate economic activity.^{3,4} Between 2014 and 2018, SNAP lifted 7.33 million people above the poverty line.⁵

The SNAP “time limit” remains one of the most complex (and contentious) rules dictating program eligibility. This policy brief will outline the specifics of this rule and present the substantive body of research that questions time limit efficacy.

Defining the SNAP time limit

First established under the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, the SNAP time limit applies to individuals classified as “ABAWDs,” which stands for “able-bodied adult without dependents” and applies to adults ages 18-49 who do not receive SNAP in the same household as a child under the age of 18.

Individuals who fall under this category are limited to three months of benefits over a three year period unless they can:

- 1 document a minimum of 80 hours of work per month
- 2 participate in an approved employment training program for a minimum of 80 hours per month
- 3 participate in an approved workfare program for the assigned number of hours per month
- 4 qualify for an exemption

Individuals are exempt from the time limit if they are:^{7,8}

- Unable to work
- Unhoused
- In school or a training program at least half time
- Pregnant
- A veteran
- Applying for or receiving unemployment benefits
- Caring for a disabled family member
- Participating in a treatment program for alcohol or drugs
- Experiencing or have experienced domestic violence
- Expected to return to work within 60 days
- 24 or younger and were in foster care on their 18th birthday

State agencies have some flexibility to administer the time limit based on local conditions. For one, areas with insufficient jobs or high rates of unemployment can temporarily suspend the time limit by applying for waivers through the USDA’s Food and Nutrition Service.⁹ States are also allotted a number of “discretionary exemptions” that can be used to extend one month of eligibility to individuals otherwise subject to the time limit.¹¹

During the federal COVID-19 Public Health Emergency (PHE), the time limit was suspended in all states under the Family First Coronavirus Act.¹² Since the federal PHE ended on May 11, 2023, the time limit returned as of July 1, 2023.¹²

Additional changes under the debt ceiling package

In early June, Congress passed the so-called “Fiscal Responsibility Act of 2023,” a bill that raised the debt ceiling in exchange for spending cuts.¹⁴ Over the next few fiscal years, this bill will temporarily expand the time limit to include individuals ages 50-54, decrease each state’s number of discretionary exemptions, and

When is each new age group added?¹⁴



increase exemptions to include veterans, unhoused adults, and individuals previously in foster care under the age of 25.^{9,14} On October 1, 2030, the time limit expansions will

end, and moving forward only individuals ages 18-49 will be subject to the time limit.¹⁴

Is the time limit supported by research?

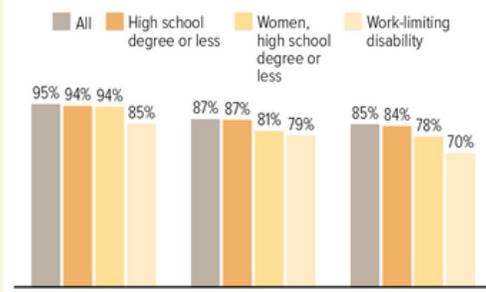
Inherent in this time limit are the racist, sexist, classist, and ableist assumptions that SNAP recipients must be compelled to work and that “work requirements” such as the existing time limit can effectively stimulate employment.¹⁵ This is not the case.

The SNAP time limit targets a group that already participates in the labor market at extremely high levels. In a 2017 sample of nondisabled adults ages 16 to 64 without young children, about 85 percent reported doing “substantial work” – at least 30 hours of work per week for at least 20 weeks per year.¹⁶

Since SNAP is designed, in part, to assist individuals experiencing temporary unemployment, it’s also important to consider SNAP employment trends over time. Research indicates that 74 percent of “nondisabled” adults participating in SNAP in a given month in 2012 were employed in either the preceding or following year.¹⁷ Those who consistently didn't work cited childcare or other caretaking duties or faced an employment barrier such as a disability – although that disability wasn't recognized by the state.¹⁷

Most Workers Were Highly Attached to the Labor Market¹⁶

Among those who worked at least one week in the previous year, 2017



Note: Limited to U.S. citizens, not active-duty military, age 18 to 64, who do not receive Social Security or Supplemental Security Income for disability, with no children under age 6 in household, who worked at least one week in the last year.

Source: Calculations by Kristin Butcher and Diane Whitmore Schanzenbach using the Current Population Survey

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There is no indication that the time limit substantially increases employment or earnings.¹⁵ One 2021 study, which used state time limit reinstatement data following the Great Recession, found “no evidence” that employment or annual earnings increased after time limit reinstatement.¹⁸ Another 2021 study followed a group of ABAWDs during Virginia’s 2013 time limit reinstatement and found no impact on employment but considerable evidence that the time limit reduced SNAP participation among ABAWDs by as much as 53 percent.¹⁹

Without evidence supporting a dramatic increase in employment or earnings, the time limit needlessly restricts access to SNAP and therefore access to proper nutrition.¹⁸ This decrease in participation occurs disproportionately among people of color, increasing racial disparities.²⁰ The time limit also creates an unnecessary administrative hurdle for individuals already facing low wages, unstable work schedules, structural racism, and labor market discrimination.^{15,21} It is unacceptable to use this failed policy to take food away from Americans experiencing food insecurity.

Congress is set to update and reauthorize the Farm Bill this fall. As a part of this process, legislators will have the opportunity to reconsider the SNAP time limit. **Given the rule’s clear harm, the 2023 Farm Bill should not increase or expand the time limit in any way. Congress must instead work to pass a Farm Bill that limits or eliminates this harsh rule altogether.**



Founded in 1996, the Greater Philadelphia Coalition Against Hunger strives to build a community where all people have the food they need to lead healthy lives.

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