

After the “Great Recession”:

Excluding “Able-Bodied” Adults from Food Entitlements in the United States

ABSTRACT

A little-known provision to the Supplemental Nutrition Assistance Program (SNAP), excluding those who are “able-bodied without dependents” (ABAWDs) from accessing long-term benefits without conforming to work requirements or eligibility guidelines, was recently reinstated at federal and state levels. States have considerable discretion in implementing the ABAWD provision, resulting in differential access to SNAP benefits. This article provides an analysis of the historical and political context of the ABAWD provision and its relevance to social work. An examination of several states’ different approaches to implementing the ABAWD rule underscores the limits of this policy and the consequent need for social work engagement and advocacy.

Introduction

In 2014, former U.S. House of Representatives Speaker John Boehner (R-Ohio) characterized the poor in the United States as succumbing to an idea that “has been born, maybe out of the economy over the last couple years, that you know, I really don't have to work I think I'd rather just sit around. This is a very sick idea for our country” (as cited in Cowan, 2014). His generalization captured the attention of news media across the political spectrum, and was lauded by conservatives and decried by progressives. Boehner invoked a durable myth scapegoating low-income individuals and families as those who preferred to subsist on government welfare supports rather than participate in the labor market to provide for themselves. This powerful and

harmful ideology undergirds recent decisions by some states to further restrict time limits for access to Temporary Assistance to Needy Family (TANF) benefits (Pear, 2016) and to forgo greater levels of participation in Medicaid under the Affordable Care Act. It is part of the growing movement by Republican members of Congress to add work requirements and time limits for those seeking health benefits under Medicaid and to introduce similar measures for those drawing upon unemployment benefits. This belief system has led to calls by current House Speaker Paul Ryan (R-Wisconsin) to cut the Supplemental Nutrition Assistance Program (SNAP, formerly known as Food Stamps) by \$23 billion (Akin, 2016). The same ideology informed efforts by a number of states in the past couple of years to voluntarily reinstate the Able-Bodied Without Dependent (ABAWD) provision of SNAP, even though these states remained eligible for an exemption to the rule.

The ABAWD rule impels those regarded by the government as “able-bodied adults without dependents” to work, enroll in qualified job training programs, or volunteer in order to receive SNAP benefits. Following the 1996 Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA), those receiving SNAP must comply with the “ABAWD rule” except in some limited circumstances where exemptions apply (Aussenberg, 2014). Those labeled “able-bodied without dependents” (ABAWDs) are limited to three months of SNAP benefits in a thirty-six month period if they are not working (United States Department of Agriculture [USDA], 2015a).

Overall, the vast majority (82 percent) of SNAP recipients live in households with members that include children, elderly, and/or disabled persons (Gray, 2014). A smaller but measurable number of low-income individuals who rely on SNAP to meet their basic food needs

are categorized as ABAWDs (Gray, 2014). Because the numbers are relatively small, the ABAWD provision has had scant attention within scholarly literature (Ribar, Edelhoch, & Liu, 2010). Thus, until the 2007 economic collapse prompted President Barack Obama to grant a nation-wide waiver to the ABAWD provision, social work scholars have ignored this aspect of “welfare reform.” Given that the opportunity to apply for automatic statewide waivers expired in 2016 and states now must apply for waivers at a local, county, or state level, it is time to examine the ABAWD rule and develop a stronger role for informed social work research and advocacy.

The period of economic instability in the United States after 2007 has presented an opportunity to examine social work’s engagement to end food insecurity. Social workers, public health experts, and community leaders have witnessed the reality that when unemployment levels rise dramatically and wages for even the employed are insufficient to meet basic needs, few supports exist within communities to assure adequate access to food. Addressing food insecurity is a small but growing focus in social work education and in state and national-level advocacy (Himmelheber, 2014; Kaiser, 2014). Yet social work is still in the early stages of effectively grappling with the issues surrounding food insecurity and their related challenges, such as high costs of rental housing, inadequate health care systems, and lack of work opportunities that pay living wages for a broad sector of U.S. society (Libal & Harding, 2015; Rank, Hirschl, & Foster, 2014).

This article focuses on a population regarded by a broad segment of society as fully capable of working, yet “unwilling” to do so—so-called “able-bodied adults without dependents.” Nationwide, these individuals are relatively small in number when compared to the vast majority of SNAP recipients who are children with their parents or guardians. The Center

on Budget and Policy Priorities (CBPP) estimated that in 2016, 500,000 to 1,000,000 individuals labeled as ABAWDs lost access to SNAP, which reflects less than two percent of those who received benefits (Carlson, Rosenbaum, and Keith-Jennings, 2016). Yet those labeled “able-bodied” without dependents are increasingly vulnerable to exclusions established at state and national levels by those who believe they must be induced to work. In this logic, even if their failure to find work is no fault of their own, then ABAWDs should no longer receive modest governmental supports for food.

We were as unaware as many of our colleagues about the ABAWD provisions until we heard the term regularly invoked by advocates at the 2015 National Anti-Hunger Policy Conference in Washington, DC. The focus on the ABAWD rule in 2015 was surprising, given that such discussions had been largely absent from sessions at the same conference in 2014. At the 2015 National Anti-Hunger Conference, formal presentations and informal conversations by professional advocates focused on state-level insights on the challenges of implementing the ABAWD rule. Through our larger research project on food justice advocacy in northeastern states, we noted that it would be easy to overlook this provision because of its complexity, wide variability in its application between states, limited job training opportunities, as well as the vilification of adults without children who “choose” not to work.¹

We regard this neglected aspect of social policy as emblematic of the need to expand the focus of social work action to groups usually not understood as “vulnerable” – in this instance so-called “able-bodied adults” who do not care for dependent children or adults. We are also

¹ In-depth interview project with food justice advocates in the US is currently in process (IRB protocol number H14-149). The purpose is to research state-level advocacy to improve the SNAP program and food security.

troubled by the lack of social work research and education on food assistance policy and welcome increased attention to the topic within the profession (Hoefer & Curry, 2012). Notably, food insecurity and policies to address food access received little mention in the American Academy of Social Work and Social Welfare Grand Challenges for Social Work, issued in 2016 (American Academy of Social Work and Social Welfare, 2016). Moreover, the almost total disregard for how the ABAWD rule has been implemented since the mid-1990s underscores a deeper concern about how populations worthy of focus get defined or “seen” by the profession. Thus, by drawing attention to the ABAWD rule, we aim to foster a climate in which social work challenges this unjust aspect of the Supplemental Nutrition Assistance Program.

The ABAWD rule in a context of ongoing “Welfare Reform”

Many social work practitioners and educators know little about the ABAWD provision that has become a focus of state-level politics in the wake of the 2007 economic recession. Yet the rule was enacted as part of an amendment to PRWORA (1996), which made critical changes to federal welfare, including the transition of welfare into state block grants known as Temporary Assistance to Needed Families (TANF) (Eaton, 2015). Addressing members of the U.S. House of Representatives in 1996, Budget Committee Chairman John Kasich (Ohio) called for support to an amendment aimed to reduce dependency on food stamps and move recipients towards self-sufficiency. Kasich said:

If there is any program that Americans who go to work are frustrated about, it is food stamps. They get frustrated to stand in line at the grocery store and just observe what goes on and the way in which people buy. . . . There is not a reason

that I can think of as to why you should not be able to put in 20 hours a week if you are able-bodied, between the age of 18 to 50, in exchange for that program. . . . I think that is fair for the people who get the food stamps, and I think it is eminently reasonable and fair for the people that pay the bills for those who get the food stamps. (142 Cong. Rec 7796, 1996)

When signed by President William Clinton, PRWORA was touted as the most sweeping reform to federal social policy since the New Deal (Eaton, 2015). At the same time that the federal government linked TANF benefits to work, it imposed time limits on those classified as ABAWD to maintain food stamp eligibility. Despite the strong exhortation to work, Kasich and others recognized that unemployment remained a challenge. Thus, Kasich included an exception, allowing states to waive time limits for those classified as ABAWDs in areas with high unemployment (Levintova, 2015).

Those classified as ABAWDs are 18- to 49-year-olds without a recognized mental or physical disability who do not live in a household with dependents (Finegold, 2008). The acronym, ABAWD, is itself dehumanizing, invoking the homonym “a-bod,” which is shorthand for “able-bodied.” Able-bodied becomes the key signifier of the individual and in this instance implies being unworthy of aid. Limited exceptions for individuals were created in recognition that employment might not be a realistic possibility even for those who wanted to work. Yet, too often due to inadequate social service institutions, even those who qualify for such exceptions do not benefit from them. And, more significantly, the profession’s silence about the exclusion of “able-bodied” adults without dependents from an entitlement to minimal food assistance is a sign of the deep marginalization of adults who are poor within U.S. society.

Within the context of this policy, which is deeply constraining, state agencies and social workers are ill equipped to implement the ABAWD provision due to many factors. Among these, most pressing for social work is that states are not prepared to implement the provision. A number of those we interviewed who have been engaged in local and national advocacy point to clear inadequacies in the capacity of states to provide education, job training, and meaningful case support for those deemed to be able-bodied. Because this provision is so poorly understood or tracked by social workers, advocacy for affected individuals has been limited. CBPP has been an important policy advocacy voice on this issue. Bolen, Rosenbaum, Dean, and Keith-Jennings (2016) of the CBPP underscore that ABAWDs are often excluded from benefits through no fault of their own:

Even SNAP recipients whose state operates few or no employment programs for them and fails to offer them a spot in a work or training program—which is the case in most states—have their benefits cut off after three months irrespective of whether they are searching diligently for a job. Because this provision denies basic food assistance to people who want to work and will accept any job or work program slot offered, it is effectively a severe time limit rather than a work requirement. . . . Work requirements in public assistance programs typically require people to look for work and accept any job or employment program slot that is offered but do *not* cut off people who are willing to work and looking for a job simply because they can't find one. (p. 1)

Those labelled as ABAWDs can only utilize SNAP benefits for a total of three months in any 36-month period with some minimal exceptions related to work history or other statuses

such as person is physical or mentally unfit to perform the employment (US Code of Federal Regulations Annual Edition, 2016b). State-level departments of social services, which generally administer SNAP, are responsible for tracking the time limit for ABAWDs. The rules are complex and require intensive case management and communication between social service providers and beneficiaries deemed to be able-bodied. Caseworkers are responsible for documenting whether or not the SNAP recipient continues to meet eligibility requirements (Carlson et al., 2016). Once a so-called ABAWD has used the three countable months in a given three-year period, the client is no longer eligible for food assistance. Those classified as able-bodied, who are enrolled in an approved employment and training (E&T) or workfare program, or work at least 20 hours a week, are not subject to this time limit (Aussenberg, 2014).²

Those deemed ABAWDs rarely qualify for other types of cash assistance, which means reinstating the three-month time limit will have a profound impact on these individuals. Notably, men make up 60 percent of the ABAWD population; they are especially vulnerable because they are less likely to be primary guardians of children or elder dependents, which would exempt them from being subject to the ABAWD rule (Bolen et al., 2016). Implementation of the ABAWD rule will be particularly difficult in states that provide only limited resources for employment and training. While some states received federal funding to develop job programs or initiatives in which recipients volunteered at an agency (National Skills Coalition, 2015), the effectiveness of such programs is unclear. Those considered ABAWDS must conform to work

² The SNAP education and training program began in 1985 with the purpose of assisting recipients to move towards self-sufficiency (Gragg & Pawling, 2012). Job search or job search training does not qualify as a work activity for ABAWDs. Job search or job search training can be included into the average 20 hours a week if it is part of an official state E&T program. State agencies can allow ABAWDs to fulfill their work requirement by permitting a 30-day job search period for the first month of receiving SNAP. However, this job search stipulation is only allowable for ABAWDs once.

requirements regardless of the state's ability to support their efforts to follow work-related rules. According to one anti-hunger advocate in the New England region, most states are ill equipped to add employment and training programs, monitor the hours that individuals volunteer or work to maintain benefits, or determine if individuals should qualify for an exemption from the rule due to the inability to work.

States have some discretion with respect to administering the ABAWD time limit and counties and municipalities can receive a time limit waiver for a number of reasons linked to unemployment rates exceeding 10 percent in defined periods and locales (USDA, 2015a). For fiscal year 2016, the U.S. Department of Labor (USDOL, 2015) identified 42 states and Puerto Rico as having areas that qualify for local waivers due to high rates of unemployment. States also have the option under SNAP regulations to give 15 percent of those classified as ABAWDs an exemption using criteria of the state's choosing (USDA, 2015a). The 15 percent exemption clause allows states to extend SNAP benefits one additional month for no more than 15 percent of its ABAWD caseload.

The Great Recession and waiving ABAWD provisions: Evidence of a patchwork nation

Nationally, following the 2007 economic recession, statewide exemptions to the ABAWD rule were nearly universally available until 2016. The time limit waivers provided the benefit to low-income individuals without raising taxes or cutting social services (Finegold, 2008). Yet, as a sign of growing opposition to providing SNAP as an entitlement, some states elected to reinstate work requirements early despite federal support for an ongoing ABAWD waiver.

The following state cases highlight examples of different approaches to ABAWD waivers employed by states and the unique challenges posed by these approaches. They also highlight the considerable discretion states have to implement critical social welfare programs. Maine voluntarily discontinued the statewide waiver and reinstated ABAWD restrictions in fiscal year 2014, while prior to January 1, 2016, Vermont and Ohio implemented partial waivers, and Connecticut pursued all possible exemptions.

“Early Adopter”: Maine as an exemplar of opting out of the ABAWD waiver program

Prior to the expiration of all statewide ABAWD waivers in January 2016, some state governments elected to reinstate the ABAWD restrictions, citing the benefits of incentivizing work for SNAP recipients in order to decrease welfare dependency. Moreover, after January 1, 2016, many states that would have qualified chose not to seek localized exemptions. In fact, as of March 31, 2016, nearly a third of all states were not seeking waivers even for municipalities or regions that would likely qualify for exemption from the ABAWD rule (USDA, 2016). Maine is one such example of a state who elected to discontinue all ABAWD waivers available prior to and after January 1, 2016.

In October 2014, Maine’s governor, Paul LePage, elected to discontinue SNAP waivers for ABAWD recipients (Pyke, 2015). Consequently, as of March 2015, over 9,000 ABAWD recipients had lost their SNAP benefits (Durkin, 2015). Before January 1, 2015, about 12,000 adults without dependents classified as able-bodied received SNAP in Maine. Three months later following the reinstitution of the ABAWD policy, this figure, dropped to only 2,680 (Durkin, 2015). Maine’s Department of Health and Human Services Commissioner Mary

Mayhew noted, “It is critical that we be creative and proactive in our efforts to replace generational welfare dependency with the self-confidence and self-sufficiency that comes from work, community service, and education” (Maine Department of Health and Human Services, 2015). Mayhew highlighted that the goal for the state is to encourage people to find work.

Critics of LePage question the legitimacy of this approach. His political platform has focused on a broad crackdown aimed at curbing abuse of benefits and endorsing work. Food advocates have highlighted that since ABAWD time limits were reinstated, the state’s emergency food pantries have been overburdened, despite evidence of economic recovery (Portland Press Herald, 2015).

According to Governor LePage’s administration, Maine’s Departments of Labor and Health and Human Services are responsible for assessing welfare recipients’ skills to match them with work and training opportunities (Bangor Daily News, 2014). The state’s Office for Family Independence announced a partnership with LearningWorks, a Portland-based non-profit, to offer 45 volunteering opportunities for ABAWD recipients of SNAP and TANF (Maine Department of Health and Human Services, 2015). The program, AIMS HIGH, operates in five schools in Maine; its goal is to support schools and students in improving academic outcomes and enhancing community engagement. While well intended, such programs are narrow in scope and thus do little to address the needs of the vast majority who will lose SNAP benefits because of this policy change. Additionally, their utility in addressing food insecurity among those labeled as ABAWDS is unclear.

Moreover, some of the Maine recipients of SNAP struggle with chronic health problems that affect their ability to work. These individuals, despite their “able-bodied” label, may rely

particularly on programs like SNAP and may not qualify for other support programs. One such SNAP recipient stated:

I was so upset. ...It was a cushion especially for me because I have dietary restrictions; I have a lot of them, and the food is very expensive. I definitely would prefer to be working; my idea was to be a psychologist ...unfortunately, Lyme Disease hit me like a brick wall and I haven't been able to work doing the job I love and went to school for and spent so much money on. (WGME, 2015)

On the contrary, Commissioner Mayhew has emphasized that Maine prioritizes support for those the government believes need it most—the elderly, people with intellectual and developmental disabilities, as well as people with mental illness (WGME, 2015). Yet what troubles food justice advocates is the failure to recognize that those who are considered ABAWD may also be vulnerable, particularly those whose ability to work is limited by physical illness or substance abuse concerns who are unable to claim disability status; such persons should be exempt from ABAWD restrictions (US Code of Federal Regulations Annual Edition, 2016b).

Despite the fact that as of 2016, a statewide ABAWD exemption is no longer available for Maine, three of its 16 counties with an estimated 100,000 residents would still qualify for locally based exemptions due to the labor market conditions (Pyke, 2015). In these areas in particular, there is a serious imbalance between the numbers of prospective employees and available jobs. And, despite their desire to work, residents in these areas may be particularly vulnerable to food insecurity without long-term access to SNAP. Such punitive policy decisions unfairly targets that state's poor.

Electing to reapply the ABAWD rule early is only one of the many ways in which Governor LePage and his administration has attempted to undermine the SNAP program. In late 2015, the federal government rebuked Maine because it had the slowest processing of SNAP benefits in the nation (Russell, 2016). In the same year, Governor LePage and Commissioner Mayhew sought permission from the USDA to implement a policy requiring that SNAP recipients show a driver's license as photo identification in order to utilize SNAP benefits, which was declined, and they implemented new asset-based restrictions on SNAP recipients in Maine. Most recently, LePage threatened to cease the SNAP program in the state of Maine, if the federal government did not grant him permission to restrict SNAP recipients from purchasing what might be deemed junk food with SNAP benefits. The federal government reportedly responded that they had significant concerns about the state's request for a junk food ban, because the state had not adequately planned how such plan would be implemented (Russell, 2016). Critics of LePage highlight that if the state withdraws from participation in the SNAP program, thousands of needy residents will go without food. Maine highlights how states' discretion in implementing the SNAP program results in differential access to SNAP benefits for vulnerable U.S. residents.

“Partial provision” of ABAWD waivers in Vermont, Ohio, and Connecticut

Prior to 2016, a few states elected to reinstate ABAWD time limit waivers for some of their geographical regions. Vermont implemented a partial waiver, but would have sought a statewide exemption if possible under federal guidelines; Ohio elected to reinstate ABAWD restrictions for some of its counties even though the state continued to be eligible for a statewide waiver; and

Connecticut maintained its statewide waiver until January 2016, and continues to pursue all possible local waivers. These varied approaches illustrate how deeply politicized SNAP has become following the 2007 economic recession. Food justice advocates point to the harms caused by considerable state discretion in determining whether or not to pursue ABAWD waivers and how to implement the ABAWD provision, which arguably undermines the notion that SNAP is an entitlement program.

Vermont. On November 1, 2013, Vermont reinstated ABAWD federal work requirements after waiting ten months to discover their initial waiver for statewide coverage could not be extended for an additional year (Vermont DCF, 2014). Then, in 2015, Vermont sought and received a partial waiver that exempted thirty towns from ABAWD work requirements (Hunger Free Vermont & Vermont DCF, 2015). In that same year, the USDA selected Vermont to implement a 3-year pilot program for SNAP recipients to gain financial independence and transition away from SNAP assistance (Associated Press, 2015). Vermont was one of ten states to receive an \$8.9 million grant to fund and evaluate the “Jobs for Independence” project (JFI) (Sen. Leahy, 2015). Administered by Vermont’s Department of Children and Families (DCF), the state’s SNAP program is known as *3SquaresVT*. The JFI program funding aimed to support 3,000 people from the hardest to reach populations, such as those experiencing homelessness, people with criminal records, and those struggling to return to the workforce (Vermont DCF, 2016). Between March and July, 2016, JFI workers had enrolled 463 of the targeted 3,000 individuals into the Treatment Group and Control Group for the pilot study (Vermont DCF, 2016).

Vermont’s state agencies have made a significant effort to strengthen supports for those labeled as ABAWDs, who may lose access to SNAP benefits. Implementing the federal work

requirements for ABAWDs prompted substantial work involving IT programming, staff training, and rewriting policies (Vermont DCF, 2014). In addition, cultivating relationships between Vermont's Department of Children and Families (DCF), Department of Labor, and community-based organizations for JFI is a time-sensitive process that varies across districts within the state.

JFI is intended by those who designed it to increase earned income by providing access to post-secondary education, skills training, financial literacy, job placement, and post-employment job retention support (Sen. Leahy, 2015; Bradshaw, Porter, & Smith, 2012). The program also touts providing comprehensive support services including quality childcare, housing, and transportation, in order to provide participants with the tools for transitioning into and retaining long-term employment.

For a small state with a minimum wage that will rise to \$10.50 in the coming years, JFI's methods to help secure employment and increase earned income for the most vulnerable SNAP participants could serve as a model for other states to replicate. According to Governor Shumlin, "We know that most Vermonters on food assistance would rather have a full-time job that will allow them to provide for themselves and their family" (Office of Governor Shumlin, 2015).

Agriculture Secretary Tom Vilsack praised the pilot projects stating, "helping people find good jobs is a far better strategy for reducing food assistance spending than across-the-board cuts" (USDA, 2015b). Despite this optimism, several food justice advocates from the northeast have underscored that such programs are costly to run and extraordinarily intensive for such a small group of beneficiaries. Even with a collaborative approach between administrative departments and streamlining of services, it remains uncertain whether JFI can assist those

labeled as ABAWDs to overcome the most complex of employment barriers in order for them to remain in compliance with SNAP work requirements.

Ohio. Unlike Vermont, Ohio chose to suspend ABAWD waivers more than two years prior to changes in federal guidelines. The state applied for waivers selectively for only some counties that qualified, which has been a matter of some controversy and led to the filing of a Title VI complaint with the USDA by food justice advocates. Ohio Governor John Kasich, who in 1996 as a member of Congress had sponsored the ABAWD amendment to PRWORA, has continued to sponsor welfare to work reform through his role in state government. Like other states, in 2007 Ohio took advantage of the federal waiver to allow unemployed ABAWDs to continue receiving modest SNAP benefits while seeking employment (Levintova, 2015). In 2014, Governor Kasich opted for a partial waiver that exempted only 16 of 88 counties from full work requirements, enabling so-called ABAWDs in these counties to maintain food stamp eligibility for more than 3 months. In order to receive waivers, each county's 24-month average unemployment rate needed to be greater than 120 percent of the national unemployment rate during that same period (Wente, 2015). Before legal and hunger advocates could meet with the Ohio Department of Job and Family Services (ODJFS) to discuss how the state would proceed with their eligibility for statewide coverage, the state submitted its partial waiver application to the federal Food and Nutrition Services office (Levintova, 2015). As of October 2015, the state exempted 18 counties (Wente, 2015).

Ohio ranks sixth in the nation for food insecurity and highest in the Midwest (Coleman-Jensen, Rabbitt, Gregory, & Singh, 2015). Amidst a struggling economy with pockets of high unemployment, nearly 130,000 individuals labeled as ABAWDs were

removed from the SNAP program between October 2013 and September 2015 (Rep. Ramos, 2015). Despite the fact that 34 additional counties and 10 municipalities met federal criteria for waiver eligibility based on high average unemployment rates, the state chose to prioritize work requirements over accepting federal allowances and \$464 million in federal assistance for those labeled as ABAWDs to maintain food assistance benefits in those counties (Patton, 2015; Rep. Ramos, 2015). Food justice advocates have highlighted the racialized dimensions of the state's decision regarding which counties to exempt. The 18 counties selected for waivers were mostly white, and from rural Appalachia (Levintova, 2015).

Response by state politicians and advocacy organizations was swift. State Rep. Michele Lepore-Hagan wrote a letter urging Governor Kasich to reconsider the time limit restrictions and work requirements in her district. She writes, "I am extremely dismayed that Youngstown - which has the highest rate of childhood poverty in the state—was excluded from critical nutritional resources that would greatly benefit struggling families" (Rep. Lepore-Hagan, 2015). From 2013-2014, Rep. Dan Ramos and Sen. Charleta Tavares sponsored bills to request waivers for all areas of the state that qualify to be covered under the waiver, though both bills died in committee (Howard, 2014; LegiScan, 2013).

In the face of a seemingly arbitrary or biased process for exempting counties from ABAWD requirements, advocates took a bolder and uncommon action. The Columbus Legal Aid organization and allies filed an administrative complaint against Ohio with the USDA's Office of Civil Rights in August 2014 (McGarvey, Shrider, Smalz, & Steinhauser, 2014). The complaint confronts the disproportionate harm that would be experienced by minority populations in urban centers where waivers were rejected by the state. According to the

complaint, almost 75 percent of the state's African-Americans, Asians, and Hispanics reside in eight counties. Not one of these eight counties was granted a waiver, although many had higher unemployment rates than counties that did receive waivers (McGarvey et al., 2014).

Persons of color comprise 37 percent of participants in Ohio's food stamp program, but less than 6 percent of the population in the 16 counties granted a waiver at that time. The percentage of White Ohioans covered by the waiver was 3.911 times greater than the percentage of minority Ohioans covered (McGarvey et al., 2014). After the policy took effect, more than 70 percent of those who lost food assistance benefits lived in urban counties where waivers were not requested (Patton, 2015). Advocates claimed that if the ODJFS intended to capture areas with the highest unemployment rate, it should have elected to use zip codes rather than counties to determine waiver eligibility by area (McGarvey et al., 2014). This method would have included high unemployment areas in the urban centers with high minority populations.

SNAP aid could have been further maximized in Ohio through a number of other methods concerning waivers and decisions. One approach would be to merge counties together to create a combined regional unemployment tally, which is permissible by federal rules (Patton, 2015). Advocates also recommended that the state use its unbanked 484,627 time limit exemptions built up over the years to reenroll participants in the food assistance program. Each exemption provides one additional month of SNAP benefits for someone impacted by time limits.

From 2013-2014, the ODJFS granted counties more than \$8 million to employment and training programs (Borchardt, 2014). Even with this increase in funding, providing meaningful opportunities to meet requirements for employment, training, or volunteering remains a

significant challenge for the state. Employment prospects are weak in many parts of Ohio. Similarly, there are not adequate volunteer placements to allow so-called ABAWDs to meet work requirements, nor are there sufficient numbers of caseworkers to process volunteer and employment opportunities (Hannah News Service, 2014).

As Ohio drafts the state plan for the new federal Workforce Innovation and Opportunity Act (WIOA), which refocuses the workforce development system on serving low-income, low-skilled adults, there is potential for the state to better coordinate career and training services for SNAP recipients, particularly those labeled as ABAWDs (Policy Matters Ohio & Ohio Poverty Law Center, 2015).³ WIOA strongly encourages states to adopt combined strategic planning models that include TANF and SNAP systems. As of 2015, Ohio had yet to form a formal strategy to combine both systems to connect with career and training services. Ohio Policy Matters and the Ohio Poverty Law Center (2015) recommend that those labeled as ABAWDs receive higher priority to access training assistance and education across the workforce development system due to their economic vulnerability and food insecurity. Lisa Hameler-Fugitt, Executive Director of the Ohio Association of Foodbanks, recently highlighted the importance of reversing punitive measures that penalize so-called ABAWDs and other SNAP recipients: “Wage stagnation, unemployment or underemployment, part-time or contingent work—this is the new norm for Ohio” (Candisky, 2015).

³ The Ohio Association of Foodbanks (OAF) conducted an assessment of 4,145 ABAWDs in Franklin County between 2013 and 2015 (Ohio Association of Food Banks, 2015). The evaluation indicated that many of these individuals struggled with access to reliable transportation; approximately one third suffered from undiagnosed physical or mental health conditions; and many were unable to pass educational requirements or faced felony restrictions that prevented them from volunteering or enrolling in workforce programs.

Connecticut. In 2009, Connecticut received a statewide exemption from the ABAWD rule, which it continued for the next six years. Its statewide waiver expired on December 31, 2015. Of the 169 towns in Connecticut, it applied for local ABAWD exemptions for the 82 towns that have high levels of unemployment and meet unemployment-related criteria (Connecticut Department of Social Services [DSS], n.d.a). The USDA Food & Nutrition Service granted such exemptions to all of these 82 towns. These 82 towns include the state's urban centers while most non-exempt towns are geographically clustered in the northern and western parts of the state (Connecticut DSS, n.d.b & c).

In Connecticut, an estimated 53,320 persons on SNAP are considered ABAWDs, 87 percent of whom reside in towns that have received unemployment-related exemption (Connecticut DSS, n.d.a). An estimated 6,884 SNAP recipients qualify as ABAWDs living in areas that are non-exempt from SNAP waivers. Therefore, of the 240,000 SNAP recipients in Connecticut, the ABAWD policy is expected to affect less than three percent of those who had been receiving SNAP benefits in 2015. The state is working to implement a rolling clock to electronically track ABAWD recipients use of SNAP in non-exempt towns, and has notified such recipients of the changes to eligibility and ways they may access help finding employment.

Connecticut is currently planning how to track ABAWD exemptions for those who meet federal work or training requirements. Connecticut has an established partnership with several community colleges across the state; these colleges receive revenue from the state amounting to 50 percent of the cost to run employment and training programs for SNAP recipients from the state (National Skills Coalition, 2015). Moreover, the state funds fifteen job-training programs that SNAP recipients can access with several non-profit, community-based organizations and

labor boards. However, these training programs are generally located in the areas that have been approved for ABAWD exemption, leaving a geographic mismatch between those who need these programs and where they are offered. Thus, those classified as ABAWDs living in Connecticut's non-exempt towns who have limited access to transportation are likely to struggle with the consequences of the provision. Additionally, Connecticut is currently pursuing non-profit partnerships to expand volunteer opportunities that may also qualify so-called ABAWDs for SNAP time limit exemption, but such programming has yet to be clearly defined and implemented.

Considering that ABAWD provisions target some of the state's most vulnerable residents and that ensuring compliance with ABAWD requirements is both cumbersome and costly, Connecticut has tried to extend potential exemptions for as long as possible and to as many SNAP recipients as possible. Despite its good intentions, the state is still unprepared to protect individuals affected by the enforcement of the provision in non-exempt towns. The Connecticut Department of Social Services (DSS) is currently facing a lawsuit accusing the agency of unjust delays in the processing of SNAP applications, which identified reduced staffing in the context of growing caseloads as one contributing factor. In response, a federal judge cited the state for such failures with a preliminary injunction in 2012 (Stuart, 2012). DSS's ongoing struggle to keep up with the timely processing of SNAP benefits, combined with the added burden of tracking so-called ABAWD recipients, suggests that moving forward, DSS's staffing capacity is likely to be even more limited. As a result, ABAWD SNAP recipients will likely be unable to access caseworkers who have the power to provide individualized exemptions based on federally defined criteria, which in some cases, require the caseworker to personally observe the client (US

Code of Federal Regulations Annual Edition, 2016a). Thus, in this way, the state is likely to permit potentially exempt ABAWDs to fall through the cracks, thereby unfairly reducing their access to SNAP.

Additionally, in order to cope with insufficient staffing, the state has relied on non-profit support to help it facilitate access to SNAP. Connecticut utilizes trained volunteers from the non-profit arena to register many people in the state for SNAP (Foodshare, 2014), and as previously noted, its ABAWD education and training and volunteer programs continue to rely heavily on collaboration from non-profit organizations. Though there are clear benefits to partnerships between state and community-based organizations, limited prioritization of resources undermines the feasibility and effectiveness of such work. If such community-based programs are not adequately funded, their success in protecting those labeled as ABAWDs will be undermined.

Each of these cases illustrates the flexibility states have in complying with the ABAWD provision, and consequently, the differential access to support clients may receive based on the state in which they live. With the ABAWD provision now fully reinstated across all states, it is important to monitor its effects on food insecurity in each state and to evaluate different states' approaches to complying with the rule. It is also critical to document best practices that highlight efficient models of reducing food insecurity for those deemed ABAWDs. Nevertheless, our ultimate stance is that this provision is both costly and unjust, and should be eliminated.

Conclusion and implications for social work practice

Analysis of SNAP and the ABAWD rule in particular, is almost entirely absent in social work scholarship. These sketches of varied state approaches to implement the ABAWD provisions are intended to prompt deeper inquiry by scholars. Clearly, such knowledge building must inform social work education and practice. We suggest a number of steps to more clearly assess the limits of ABAWD provisions and their impact on individuals in the coming years, particularly since the ability to apply for automatic, statewide waivers is no longer available across the United States. In order to build effective state and national advocacy campaigns for policies that more effectively address food security, data on the impact of the ABAWD provision on individuals must be systematically collected at the state level. Analysis of administrative data should be complemented by qualitative studies to understand better how those labeled “able-bodied” grapple with attempting to comply with work, job training, or volunteer requirements. Moreover, examining the views of those implementing the ABAWD provisions would help build a comparative understanding of how resource-intensive such a policy is and to what effect. The profession would then be better situated to challenge the ABAWD provision, and other work-related measures that are being introduced in Congress and at state levels, and the inherent assumptions about the undeserving poor fostered by such measures.

It is our view that the ABAWD distinction is dehumanizing and fails to conform with a rights-based approach to social policy (Gatenio Gabel, 2015). Moreover, the lack of adequate resources for effective education and training programs, persistent unemployment and underemployment, as well as the considerable resources required for intensive monitoring of ABAWD compliance, all point to the need to eliminate this provision. Rather, we would

advocate an approach that assumes individuals are doing their best to secure employment, often under great pressures and obstacles. In short, the right to food trumps ideologically driven policies to push people to work, regardless whether or not opportunities to work exist (Libal & Harding, 2015).

In the current policy landscape, which obliges those identified as ABAWDs to work, social workers trained at bachelors and masters levels must be sensitized to the ABAWD provisions. It is critical that they be able to effectively implement waivers in exempted areas and make determinations about a person's ability to gain and hold a job who faces substantial barriers to working. Social workers, if apprised of the parameters and limits of the current policy, may also become better advocates for policies that allow gradual transition from services to "self-sufficiency." Additionally, they may become more effective allies for those labeled ABAWDs who cannot find work, and who live in areas with high rates of unemployment.

As long as the ABAWD provisions are in effect, social workers have an obligation both to help create and implement quality work, training or volunteer programs that are accessible to adults without dependents. Running ABAWD programs at state levels is costly and time consuming. As a number of food justice advocates asserted in interviews, education and training programs are underfunded and may not be the most equitable approach to addressing food insecurity. Barriers to accessing programs and ongoing challenges in the labor market mean that even in parts of the country with growing economies, all adults classified by the government to be able-bodied may not be able to comply with the policy and receive SNAP benefits. Pressure must also be applied at the state and federal levels to secure funds for evaluation of work training

programs, including the effectiveness of programs in helping participants secure and maintain jobs that provide adequate, living wages.

Finally, advocacy at the state and federal levels is needed to ensure that equitable policies promote food security for all people, including adults who do not care for dependents (Hoefler & Curry, 2012; Libal & Harding, 2015). After all, an estimated 77 percent of families accessing SNAP benefits have at least one household member working (U.S. Census Bureau, 2017). Thus, a clear implication is that even for those who work, wages are not sufficient to meet basic food needs. Such advocacy is perhaps more critical now than ever, as SNAP is at risk for additional cuts. Republicans in Congress are already planning to work with the newly elected President Donald Trump to expand work requirements for recipients and tighten eligibility (Jalonick, 2016). Such restrictions will exacerbate food insecurity and further marginalize those most vulnerable.

Social workers, working in tandem with others including food justice activists, legal aid attorneys, and public health nutritionists, must advocate for comprehensive, just policy reform. The National Association of Social Workers (NASW) can help facilitate such advocacy by developing a platform and corresponding policy statement on food insecurity in *Social Work Speaks* and by hosting a town hall forum to challenge the ABAWD construct as a valid approach to addressing food insecurity. NASW could also take a robust role in drafting amicus curiae briefs, using its voice in the courts to hold states accountable for failures to process SNAP claims according to federal regulations. Finally, social work must grapple with the underlying economic instability that perpetuates food insecurity via policy advocacy to promote living wages and affordable housing.

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