

RESEARCH REPORT

Reinstating SNAP Work-Related Time Limits

A Case Study of Able-Bodied Adults without Dependents in Kentucky

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Reinstating SNAP Work-Related Time Limits

The federal government is considering a change to long-standing policy in the Supplemental Nutritional Assistance Program (SNAP, formerly known as Food Stamps) that would constrain states' ability to waive work requirements for able-bodied adults without dependents (sometimes referred to as ABAWDs).¹ Currently, adults in this program category are limited to 3 months of benefits in a 36-month period unless they are working and documenting at least 80 hours a month or the US Department of Agriculture (USDA) grants a waiver for areas where local economic conditions (specifically, a "lack of sufficient jobs for these individuals") prevent these participants from complying with these work requirements. Although this group is called "able bodied," they may have health or educational or skill barriers that make it difficult for them to obtain and maintain employment (Carlson, Rosenbaum, and Keith-Jennings 2016). This report examines the recent experiences of those considered able-bodied adults without dependents in Kentucky to provide evidence of the proposed rule's potential effects. Between January 1, 2017, and May 1, 2018, Kentucky reinstated work-related time limits in SNAP for individuals in this category living in most counties in the state—even though many would have still qualified for waivers under federal criteria for a lack of sufficient jobs. Kentucky initially reinstated these work-related time limits in seven relatively economically prosperous counties in 2016.

We analyzed SNAP caseload data from January 2017 through September 2018 to assess patterns of change across Kentucky. These are our key findings:

- After Kentucky reinstated work-related time limits for those considered able-bodied adults without dependents, the number of people in this category receiving SNAP declined 30 percent, far outstripping the decline of 12 percent in the overall SNAP caseload. The decline in participation among those in the ABAWD category cannot be solely attributed to time limits, but the limits appear to account for a significant portion of exits from the program.
- At least 13,122 SNAP participants lost benefits because they reached the three-month time limit. Although the ABAWD caseload fluctuated, this decline represents 20 to 22 percent of the ABAWD caseload during that time frame.
- Comparing disenrollment from SNAP between economically similar counties with and without work-related time limits, the ABAWD SNAP caseload declined more in counties where work-related time limits were reinstated, even though they had nearly identical caseload trends

before the policy change. The differences were dramatic, with a 44 percent decline in the counties where time limits were reinstated versus a 2 percent decline in the eight counties that continue to have waivers because of Paths 2 Promise, a federal demonstration project in Kentucky (USDA, n.d.).²

- The rapid loss of SNAP benefits associated with a policy change without clear evidence that individual well-being is improving is concerning and merits further evaluation and attention from policymakers.

Background on Work Requirements in SNAP

SNAP is the primary federal nutrition program in the United States. In the typical month in 2018, the program helped 40 million people afford food.³ While more than two-thirds of those served by SNAP are children or the elderly or disabled, 13 percent of those served are categorized as able-bodied adults without dependents (CBPP 2018a). For many adults in this group, SNAP is critical (Carlson, Rosenbaum, and Keith-Jennings 2016).

BOX 1

Who Are Able-Bodied Adults without Dependents?

“Able-bodied adults without dependents” is statutory language that refers to adult SNAP participants who are considered “nondisabled” because they do not receive federal disability benefits. They also do not have custodial children or other dependents living with them. This definition, however, does not account for the fact many do have physical or psychological impairments that prevent them from working, even though they do not receive federal disability benefits. One study in Franklin County, Ohio,^a found that as many as one-third of able-bodied adults enrolled in SNAP had at least one barrier (e.g., depression, post-traumatic stress disorder, mental or learning disabilities, or physical injuries) that limited their ability to work, even though the condition was not severe enough to qualify them for federal disability benefits. Additionally, one-quarter of the adults in the Franklin County study were noncustodial parents, which may mean that they have child support obligations or other responsibilities for children not living with them. We use the term “able-bodied adults without dependents” to describe the population affected by Kentucky’s SNAP waiver policy. But the term has limitations and does not describe the full set of circumstances of individual adult SNAP participants. The term “able-bodied adults without dependents” is a technical term and should be used and interpreted with care.

^a“Comprehensive Report: Able-Bodied Adults without Dependents,” Franklin County Ohio Work Experience Program, Ohio Association of Foodbanks, accessed March 21, 2019.

The 1996 welfare reform law imposed new restrictions on SNAP participation. The Personal Responsibility and Work Opportunity Reconciliation Act stated that able-bodied adults without dependents are statutorily limited to 3 months of benefits in a 36-month period if not working at least 80 hours a month. Participation in unpaid work through a special state-approved program, known as “workfare,” and participation in qualifying education and training activities both count toward the work requirement.⁴

BOX 2

Work Requirements in SNAP

SNAP has a general work requirement for participants ages 18 to 59. Participants are required to register for work, to never voluntarily quit a job or reduce their hours, to take a job if one is offered, or to participate in employment and training programs if their state requires it. Children, adults 60 and older, pregnant women, and others deemed exempt because of physical or mental health reasons are exempt from the general work requirement.^a

In addition, adults without dependents ages 18 to 49 who are also not disabled must meet a stricter work requirement to maintain SNAP benefits. These SNAP participants must work, participate in a qualifying education or training activity, including SNAP Employment and Training programs if available, for at least 80 hours a month. If a state has such a program in the area where an able-bodied adult participant lives, participants may also do unpaid work through state-approved “workfare programs,” in which the hourly requirement is determined by the benefit amount the participant receives.^b

If those subject to ABAWD rules do not meet the work requirement, they may receive SNAP for only three months during a three-year period. These three months do not have to be consecutive. When the three-month period is exhausted, participants who are considered part of the ABAWD category have reached their time limit for receiving SNAP unless and until they come back into compliance.

^a“Am I Eligible for SNAP?” US Department of Agriculture, Food and Nutrition Service, accessed March 21, 2019, <https://www.fns.usda.gov/snap/eligibility>.

^b“Able-Bodied Adults without Dependents (ABAWDS),” US Department of Agriculture, Food and Nutrition Service, July 17, 2018, <https://www.fns.usda.gov/snap/able-bodied-adults-without-dependents-abawds>.

ABAWD rules also provide certain exemptions from the time limit for people responsible for the care of a child or incapacitated household member, women who are pregnant, people who are certified as physically or mentally unfit for employment, and those already exempt from the general SNAP work requirements.⁵

The Personal Responsibility and Work Opportunity Reconciliation Act instituted new work requirements and time limits for those considered able-bodied adults without dependents as a condition for maintaining SNAP eligibility, but the law also included a “waiver” provision recognizing that local economic conditions have a significant influence on a person’s ability to comply with work requirements. All states, except Delaware, waived work-related time limits during the Great Recession, and several have removed those waivers in all or parts of their state as the economy has improved. In addition, some states have reinstated time limits, even though economic conditions continue to lag national statistics and still have many areas that would qualify for a waiver.

This report looks at Kentucky, which removed time-limit waivers in almost all of the state between 2016 and 2018, even though many counties still met one or more of the federal criteria to have time limits waived. Kentucky is not unique. A comparison of the most recent USDA data on the status of ABAWD waivers by state indicates that 13 states—Alabama, Arkansas, Delaware, Florida, Kansas, Mississippi, Missouri, North Carolina, Oklahoma, South Carolina, Texas, Wisconsin, and Wyoming—operate SNAP programs without any ABAWD waivers in place, even though they have at least one county or other geographic area that could qualify.⁶

How ABAWD Waivers Work

SNAP allows “the [Department of Agriculture] Secretary [to] waive the applicability of [the work requirement] if the Secretary makes a determination that the area in which the individuals reside—(i) has an unemployment rate of over 10 percent; or (ii) does not have a sufficient number of jobs to provide employment for the individuals.” The USDA, through federal regulations first fully codified by the Bush administration in 2001,⁷ has interpreted the ability of a state to qualify for a waiver under the insufficient jobs criteria as follows:

- The state has eligibility for extended unemployment benefits⁸
- The areas for which a waiver is sought have a recent 24-month average unemployment rate 20 percent above the national unemployment rate for that same period
- The proposed waived areas are designated as Labor Surplus Areas (LSAs) by the US Department of Labor, which includes a minimum two-year unemployment rate of 6 percent⁹

States can apply to waive SNAP ABAWD work requirements in areas that meet the criteria and must submit a request with supporting data to the USDA, which reviews and either approves or denies the request.¹⁰ Because of these waivers, the share of the population living in an area operating under an

ABAWD waiver has fluctuated. Throughout the 1990s, about 30 percent of the population lived in areas that asked for ABAWD waivers and met the requirements (Bolen and Dean 2018). It was only during the Great Recession, during which the time limit was suspended in almost all states, that coverage increased markedly. Most states still qualified for and asked for waivers as the economy began to recover. As a result, 90 percent of the population lived in areas waived from time limits throughout the Great Recession up until 2014 (Bolen and Dean 2018). Since then, the share of the population living in areas with ABAWD waivers has declined substantially to just below 40 percent in 2018.

The Office of Inspector General has documented states' motivations for offering waivers in a recent audit (OIG 2016). Those motives include the desire to protect people in high-unemployment areas, a desire to avoid punishing beneficiaries for the limitations of SNAP Employment and Training (E&T) services, and difficulty administering the time-limit policy.¹¹

The reach of ABAWD waivers has declined markedly, but the administration recently announced a new effort to restrict the provision's use. On February 1, 2019, the administration published a notice of proposed rulemaking reflecting its intent to constrain states' flexibility to seek waivers by altering long-standing regulations governing the criteria for SNAP ABAWD waivers.¹² The proposed rule would narrow the options for seeking an ABAWD waiver by eliminating the LSA designation and limiting the elevated unemployment rate provision to areas with a minimum unemployment rate of 7 percent.¹³ The USDA believes the proposed rule could reduce the number of areas covered by ABAWD waivers by about 75 percent.¹⁴ It would also result in 755,000 people losing SNAP benefits in fiscal year 2020, according to a USDA estimate.¹⁵

Although the proposed rule, if implemented as written, would alter the conditions under which states would be permitted to seek waivers, some states have already reinstated time limits in areas that could have qualified for waivers under the existing criteria. The motivations for dropping waivers absent economic changes that would disqualify an area for a waiver are less clear, as doing so reduces a state's flexibility to respond to local conditions that may influence SNAP participants' well-being and eliminates federally funded benefits that are an economic stimulus to local economies (Hanson 2010). The notice of proposed rulemaking asserts that a time limit increases employment.¹⁶ In some states, the removal of SNAP time limit waivers has been accompanied by efforts to extend work requirements to other safety net programs, such as Medicaid. Kentucky structured the reinstatement of its SNAP time limits to coincide with its planned implementation of Medicaid work requirements for many working-age adults in summer 2018, although implementation of Kentucky's Medicaid waiver has been subsequently delayed because of litigation.¹⁷

Characteristics of Able-Bodied Adults without Dependents Receiving SNAP

Able-bodied adults without dependents who receive SNAP benefits tend to be disadvantaged. Nationally, the average gross household income for the group is 33 percent of the federal poverty level (Cronquist and Lauffer 2019). Recent analysis of data from the Survey of Income and Program Participation has shown that most individuals in this category do work, and only about one-quarter are out of the labor force entirely during a two-year period.¹⁸ Among those who are consistently not working, the most common reason is poor health or disability (but not receiving disability income). Those who do work may experience periodic spells of unemployment that put them at risk of losing benefits under a strict work requirement. More than a third of workers said their loss of employment was because of a work-related reason, such as failure to find work or being laid off. Less than one-half of 1 percent of able-bodied adults without dependents reported not working because of a lack of interest.

Other research suggests that individuals classified as ABAWDs tend to have limited educational attainment (Carlson, Rosenbaum, and Keith-Jennings 2016). More than one-quarter have less than a high school education, while more than half report having attained only a high school diploma or GED (Carlson, Rosenbaum, and Keith-Jennings 2016).

A study of able-bodied adults by the Ohio Association of Foodbanks found that while this group is referred to as “able-bodied adults *without dependents*,” close to 25 percent were noncustodial parents, and 13 percent were caregivers to a parent, relative, or friend (OAF, n.d.).

Kentucky recently expanded its efforts to offer SNAP E&T programs to able-bodied adults without dependents and other SNAP participants. E&T aims to allow SNAP participants to gain skills, training, or work experience to help them secure regular employment opportunities.¹⁹ National data on SNAP E&T participants reveals that they typically have limited educational attainment, with just 42.6 percent having obtained a high school diploma. Furthermore, 28 percent of E&T participants report one employment barrier, and 52 percent report two or more. The most common barriers reported are transportation issues (35.6 percent), health issues (30.3 percent), and lack of education (27.4 percent).

National data and other research suggest that individuals who are subject to the ABAWD rules face numerous challenges obtaining and maintaining stable employment. In Kentucky, a state with many rural counties, these challenges can be exacerbated by limited transportation options and limited economic opportunity.

Evidence from Kentucky's Reinstatement of SNAP ABAWD Work-Related Time Limits

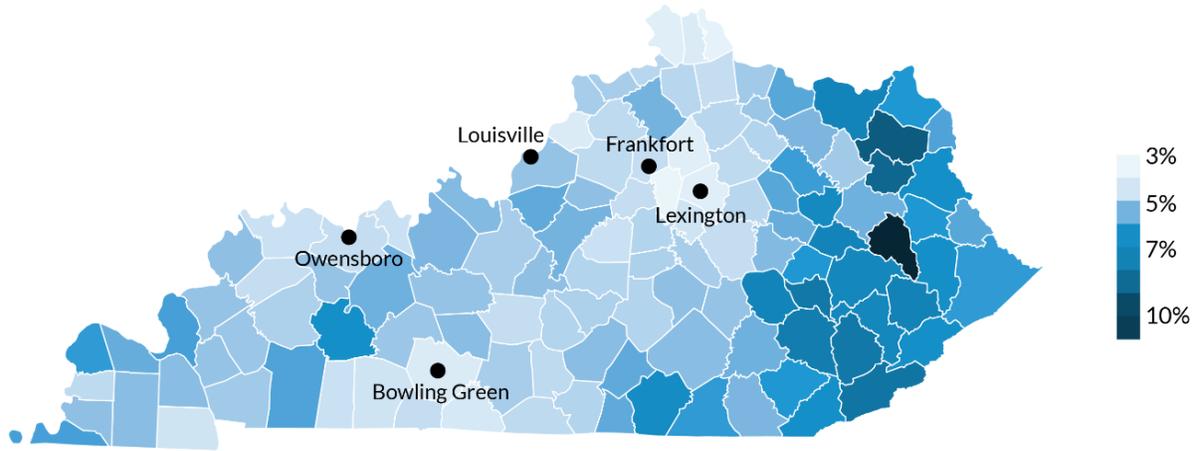
The Role of SNAP and ABAWD Waivers in Kentucky

SNAP is an important support for many Kentuckians, reaching 13 percent of the state's population, or about 568,814 residents, in 2018.²⁰ In 2017, the most recent year for which data are available for SNAP characteristics, a significant share of Kentucky's SNAP participants were living in deep poverty, with 45 percent reporting income at or below 50 percent of the federal poverty level, excluding the value of SNAP benefits (CBPP 2018b).²¹ But SNAP has also been important for lifting many Kentuckians out of poverty, keeping about 145,000 people out of poverty annually between 2014 and 2016 if the value of SNAP benefits is counted as cash.²²

Waivers can provide flexibility in administering work requirements on the ground, accounting for varying economic conditions that may make it more difficult for people to consistently maintain employment. Such geographic variation is evident in Kentucky, which has wide variation in economic conditions based on place, with severe pockets of distress.

As of September 2018, the most recent month for which SNAP ABAWD caseload data were available, the statewide unemployment rate was 4.5 percent.²³ Although it lagged the national seasonally adjusted employment rate of 3.7 percent, the state's performance has improved dramatically since the Great Recession, when statewide unemployment was 10.7 percent. Nevertheless, statewide figures mask persistent differences across Kentucky's 120 counties (figure 1). In September 2018, unemployment rates ranged from a low of 3 percent in Woodford County to a high of 11.7 percent in Magoffin County (KY Stats, n.d.). Twenty counties experienced unemployment rates of 6 percent or higher.

FIGURE 1
September 2018 Unemployment Rates in Kentucky by County



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Source: “Local Area Unemployment Statistics,” Bureau of Labor Statistics, accessed March 22, 2019, <https://www.bls.gov/lau/>.

Parts of the state continue to face persistent challenges. For fiscal year 2019, the Department of Labor characterized 51 counties as LSAs.²⁴ And 43 counties are designated as persistent poverty counties, meaning they have had at least 20 percent of residents living in poverty in each decennial census since 1990.

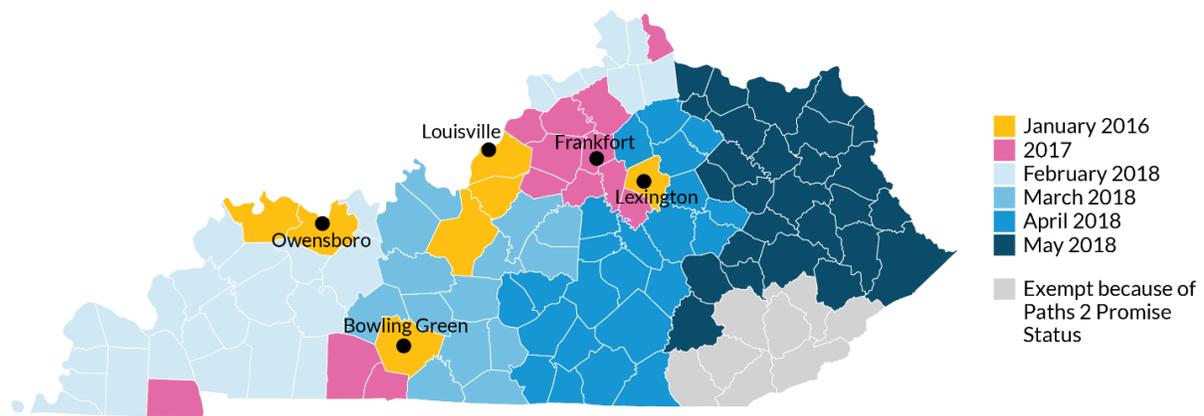
BOX 3

Reinstatement of Time Limits across Kentucky

In January 2016, Kentucky began reinstating work-related time limits for SNAP participants classified as able-bodied adults without dependents in groups of counties, and by spring 2018, all but eight counties were once again covered by the SNAP ABAWD policy. Initially, the state reinstated the ABAWD work-related time limit in seven populous counties, including those that encompass Bowling Green, Lexington, Louisville, and Owensboro. By the end of 2017, 20 counties had become newly subject to time limits. Another 92 followed suit in 2018 (28 in February, 15 in March, 22 in April, and 27 in May).^a

^aDustin Pugel, "Reinstating Time Limits for Food Assistance Will Hurt Low-Income Kentuckians and Local Economies," *Kentucky Policy Blog*, Kentucky Center for Economic Policy, February 26, 2018, <https://kypolicy.org/reinstating-time-limits-food-assistance-will-hurt-low-income-kentuckians-local-economies/>.

FIGURE 2
ABAWD Time-Limit Waiver Reinstatement Dates in Kentucky, by County



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Source: Dustin Pugel, "Reinstating Time Limits for Food Assistance Will Hurt Low-Income Kentuckians and Local Economies," *Kentucky Policy Blog*, Kentucky Center for Economic Policy, February 26, 2018, <https://kypolicy.org/reinstating-time-limits-food-assistance-will-hurt-low-income-kentuckians-local-economies/>.

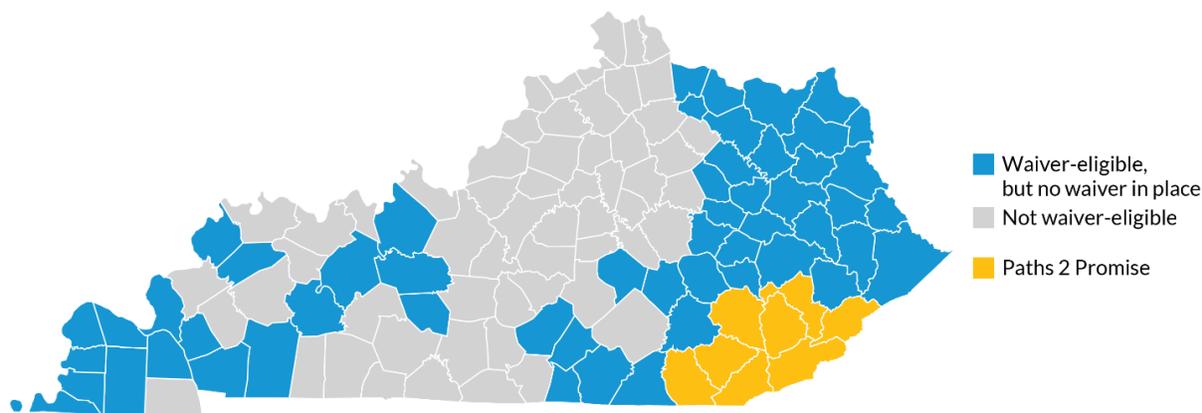
Note: The map above notes the date at which time limits were officially reinstated, and for those not engaged in a work activity at the roll-off date, the three-month benefit expiration would occur at the beginning of the fourth month.

The state made intentional choices in how it lifted waivers, reimposing ABAWD work requirements in eastern Kentucky counties with the highest unemployment rates last.

Changes in SNAP Caseloads Following Reinstatement of Work-Related Time Limits

Fifty-four of Kentucky's 112 counties where the state removed waivers would have continued to qualify for one in 2018 (figure 3).²⁵ Most of these changes took effect between January 2017 and September 2018 (see the appendix for a schedule of time-limit reinstatements by county). The state has indicated that the ABAWD waivers were lifted because of its belief that the economy was strong enough to support employment that would meet the work requirements and that it planned to expand SNAP E&T services to all 120 counties, save those participating in the Paths 2 Promise federal demonstration project, during 2018.²⁶

FIGURE 3
ABAWD Waiver-Eligible Counties in Kentucky



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Sources: "Local Area Unemployment Statistics," Bureau of Labor Statistics, accessed March 22, 2019, <https://www.bls.gov/lau/>. "Local Surplus Area: Fiscal Year (FY) 2019 Labor Surplus Areas (LSA)," US Department of Labor, Employment and Training Administration, last updated October 3, 2018, https://www.doleta.gov/LSA/eta_default.cfm.

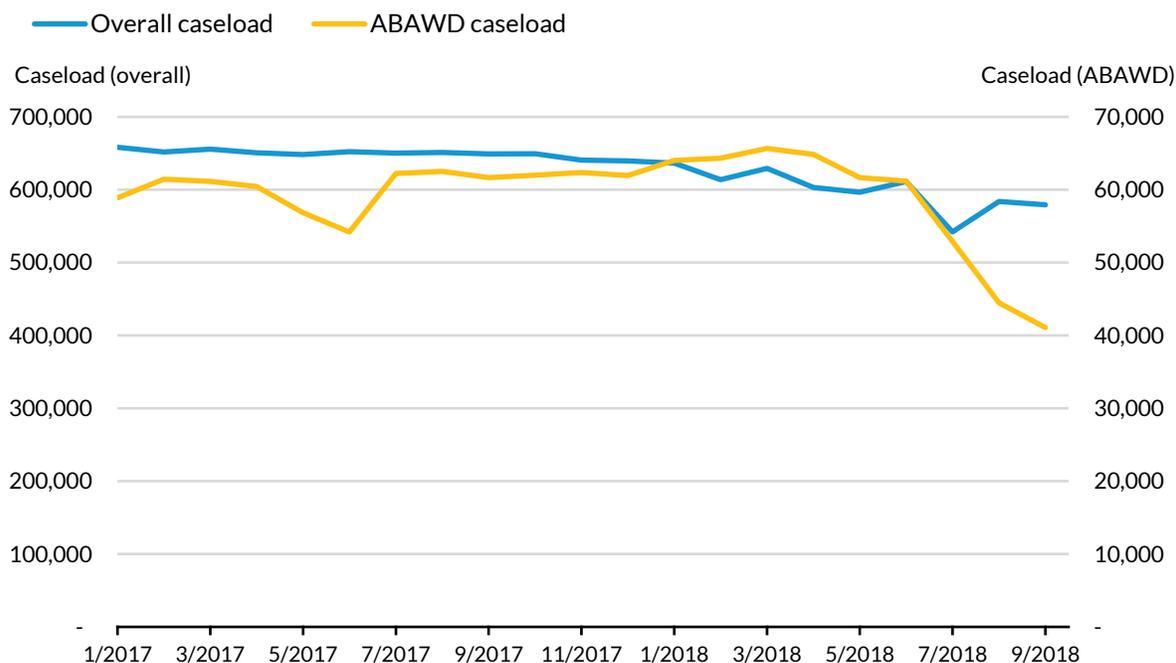
Note: ABAWD = able-bodied adult without dependents.

To assess the trends in able-bodied adult participation in SNAP following these changes, we analyzed SNAP caseload data by county in Kentucky from January 2017 through September 2018. The data were provided by Kentucky Voices for Health, which accessed the data from the Kentucky Cabinet for Health and Family Services under an open-records request.²⁷

The SNAP ABAWD caseload declined by 17,803 people, or 30 percent, between January 2017 and September 2018 (figure 4).²⁸ During the same period, the overall SNAP caseload in the state declined 12 percent.²⁹ Although able-bodied adults appeared to exit the program at a more significant rate than the general population, we can draw few conclusions from the divergence in these trends alone. Some

SNAP participants not subject to work requirements and time limits, such as seniors and the disabled, would not typically be expected to leave SNAP in an improving economy. Some might expect able-bodied adults without dependents to access better work opportunities more quickly in an improving economy than other working-age SNAP participants subject to the general, less stringent, work requirement because they are perceived to face fewer logistical challenges (e.g., unlike custodial parents, they would not typically need to arrange for child care). But research suggests that able-bodied adults without dependents participating in SNAP are vulnerable, often experiencing significant physical and mental health challenges and other barriers to work, such as limited skills and low educational attainment. Thus, a rapid change in their SNAP participation could be a cause for concern. Given these known challenges and the fact that 54 of the 112 counties in which ABAWD time limits were reinstated would have still qualified for a federal waiver based on a measure of insufficient jobs, it is important to further explore how caseload data and other information about economic conditions can shed light on the potential impact of policy changes on Kentucky SNAP participants.

FIGURE 4
Caseload Changes in Kentucky: Total Participants versus Able-Bodied Adults without Dependents



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Source: Kentucky Cabinet for Health and Family Services.

Note: ABAWD = able-bodied adults without dependents.

The rest of this report will explore ABAWD caseload trends exclusively, examining these data by geography and drawing on case-closure reasons identified in the state dataset.

Examining Reasons for the Reduction in Able-Bodied Adult SNAP Caseloads

We analyzed case-closure data from the state that specified whether able-bodied adults no longer participated in SNAP because of exhaustion of the three-month time limits or for “other reasons.” The data show 13,122 able-bodied adult participants were disenrolled from SNAP benefits specifically because of exhaustion of the three-month time limit between January 2017 and September 2018 (appendix table A.1 shows how this has varied by month, along with the state’s total able-bodied adult population). This decline represents about 20 percent of the statewide ABAWD caseload, which included 59,152 people in January 2017 and hit a peak of 65,745 in March 2018. This number may be a lower-bound estimate on losses related to the change in ABAWD policy because SNAP cases may be closed for other related administrative reasons. For example, if clients anticipate they will not be able to comply and do not submit documentation or show up for appointments, the cases could be closed for noncompliance. We lack additional detail about the “other reasons” category, which could also include cases closed for positive reasons, such as when SNAP participants who were already working and in compliance increased their earnings beyond the eligibility threshold or if participants who were previously unemployed obtained a job with wages that lifted them beyond the eligibility level. Further insights from case-closure data are limited by insufficient detail and because significant, unexplained fluctuations in the “other” code in some months make trends difficult to discern.

Comparing Caseload Trends in Paths 2 Promise and Their Surrounding Counties

Eight Kentucky counties continue to waive ABAWD time limits because of their participation in the federal SNAP E&T demonstration project (known in Kentucky as Paths 2 Promise), and these counties provide a potential comparison group for directly comparing the changes in the able-bodied caseload. But the comparison is useful only if the waived counties are somewhat similar in characteristics to those areas where time limits have been reinstated (USDA, n.d.). There is considerable variation in unemployment rates across the state. But by confining our comparison group to counties that are geographically contiguous to the waived group, we can assess caseload changes within similar economic contexts. Table 1 summarizes key economic indicators for both the Paths 2 Promise counties and a set of counties we identify as “surrounding,” meaning geographically contiguous. Many surrounding counties are in the same local workforce development areas as one another (all, save four, are in the

Eastern Kentucky Concentrated Employment Program).³⁰ The Paths 2 Promise counties have experienced long-term economic disadvantage, and they lag most other counties in terms of labor force participation, household income, share of residents not in poverty, and educational attainment (table 1). Nevertheless, the counties we have flagged as “surrounding” also face significant economic challenges, and on some indicators may perform as poorly or more poorly than those in the Paths 2 Promise group. These surrounding counties are not statistically different than the Paths 2 Promise counties on any measure at the 5 percent confidence level. But they are statistically different than the rest of the state on unemployment rates, labor force participation, white population share, median household income, poverty rate, and the share of people older than 25 who did not complete high school.³¹ In addition, all but one of the surrounding counties are also LSAs, as designated by the Department of Labor to describe areas with a lack of jobs. Specifically, such areas are defined as places where the “unemployment rate is 20 percent above the national (Puerto Rico included) annual average unemployment rate for the two-year reference period.”³² Although unemployment rates are typically used as a primary indicator of economic opportunity, the statistic has limitations because it does not incorporate people who are underemployed and may be unable to secure more work hours or who have become discouraged from participating in the labor force (employed or seeking work) altogether. The annual average unemployment rate by traditional definition sits at 3.9 percent nationwide and 4.4 percent in Kentucky as of 2018, but a more comprehensive definition of labor underutilization that combines the unemployed with all marginally attached workers and all workers employed part time for economic reasons, as a share of the civilian labor force plus all marginally attached workers, increases this figure to 7.7 percent nationally and 8.1 percent in Kentucky.³³ Furthermore, general unemployment masks the more challenging employment realities for subgroups of those participants subject to ABAWD policy, such as African Americans and those with limited educational attainment.³⁴

TABLE 1
Characteristics of Paths 2 Promise and Surrounding Counties
Percent, except where noted

	Paths 2 Promise	Surrounding counties	Rest of state^a
Unemployment rate	4.4	4.9	3.8
Labor force participation rate among residents ages 16 and older	42.1	47.1	57.7
White population share	96.2	96.4	90.9
Median household income (\$)	27,887	32,306	48,223
Poverty rate	30.1	25.9	15.6
Residents older than 25 who did not complete high school	16.9	13.6	10.1
Residents older than 25 with only a high school diploma	36.1	38.4	35.6

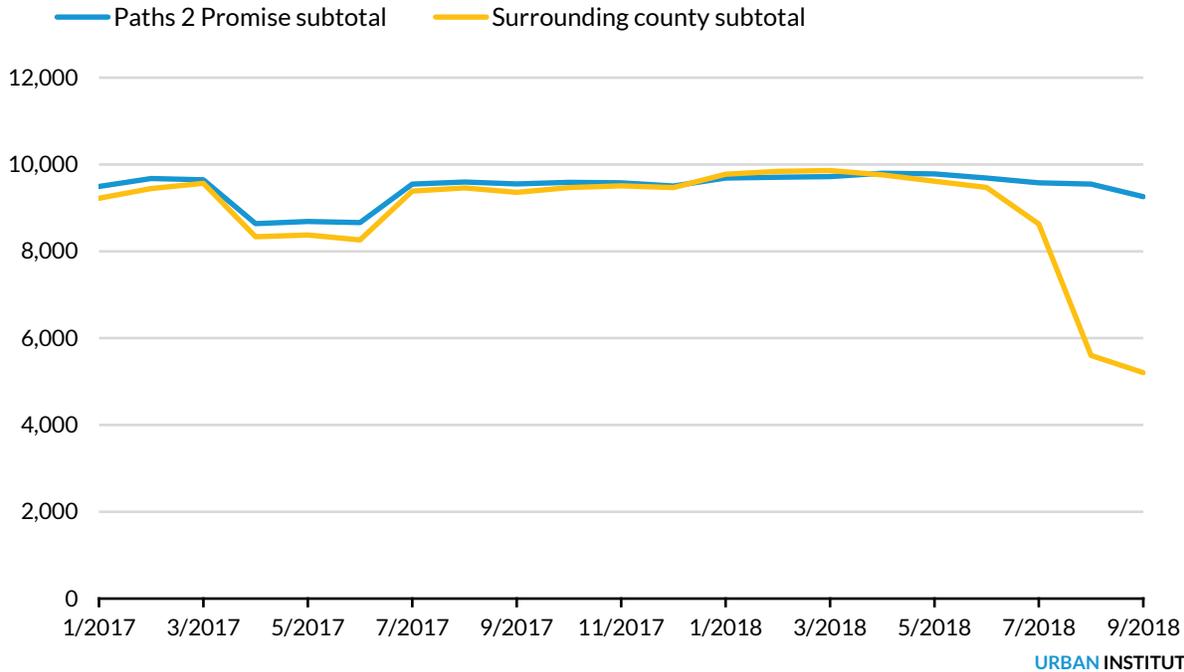
Source: American Community Survey five-year 2013–17 data and 2010 Decennial Census.

^a Rest of the state excludes counties where waivers were lifted in 2016.

Another important difference between the two groups is that the Paths 2 Promise counties have access to more comprehensive and complete services aimed at connecting SNAP participants with employment (e.g., supplemental wraparound and support services, including reimbursement for transportation and child care, payment for training, job placements through members of an Employer Resource Network and other employers, and coaching while in training or employment). The extent to which these services contribute to achieving better employment outcomes has not been established and is being assessed as part of the demonstration. But these services represent a more robust set of supports than are available to the surrounding counties. As such, these services might make it more likely for SNAP participants receiving them to obtain regular work if work is available.

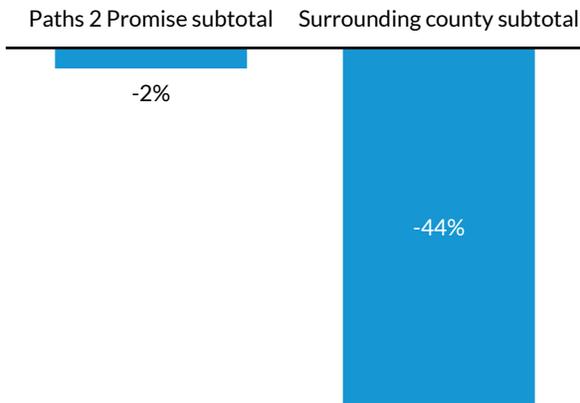
Figure 5 shows the changes in the SNAP ABAWD caseload in both groups of counties, the Paths 2 Promise group that continues to have time-limit waivers for able-bodied adults and the surrounding counties group, which had waivers removed as of April and May 2018. From January 2017 through September 2018, the SNAP ABAWD caseload in the surrounding counties group declined by 4,019 people, or 44 percent. But in Paths 2 Promise counties, the SNAP ABAWD caseload has remained stable, notching a 2 percent decline, or 237 people, since January 2017. These trends suggest rapid disenrollment attributable to the removal of the waivers. The significant divergence in trends in areas with constrained economic opportunity suggests that the primary result of reinstating the time limits may have been loss of benefits because of not meeting the ABAWD work requirement or providing required documentation rather than a natural level of exit because of improved employment opportunities. Future evaluation of employment outcome data, which were not available for this analysis, would be helpful for better understanding the impact on these SNAP participants.

FIGURE 5
ABAWD Caseload over Time
Paths 2 Promise versus surrounding counties



Source: Kentucky Cabinet for Health and Family Services.
 Notes: ABAWD = able-bodied adults without dependents. Excludes the seven counties that had waivers lifted in January 2016.

FIGURE 6
Percentage Drop in SNAP ABAWD Caseload since January 2017
As of September 2018



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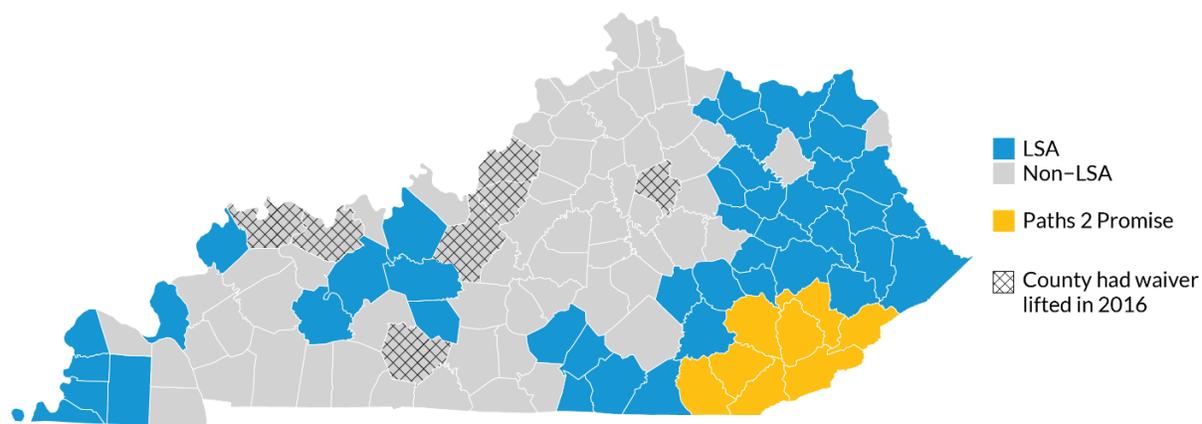
Source: Kentucky Cabinet for Health and Family Services.
 Notes: ABAWD = able-bodied adults without dependents; SNAP = Supplemental Nutrition Assistance Program. Excludes the seven counties that had waivers lifted in January 2016.

Comparing Caseload Trends in Labor Surplus Areas and Other More Economically Advantaged Counties

One final source of comparison we explore is the change in ABAWD caseloads among counties that are all, or in part, considered LSAs and counties that do not have this designation (the former group is more economically disadvantaged). LSAs are defined as areas with high unemployment rates, with a floor of 6 percent to qualify.

There are a few further notable distinctions between LSAs and non-LSAs. Figure 7 shows the geographic distinctions between them. Most LSAs are in rural parts of the state, distant from main urban centers such as Bowling Green, Lexington, and Louisville.

FIGURE 7
County Types in Kentucky, LSA versus Non-LSA



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Source: “Local Surplus Area: Fiscal Year (FY) 2019 Labor Surplus Areas (LSA),” US Department of Labor, Employment and Training Administration, last updated October 3, 2018, https://www.doleta.gov/LSA/eta_default.cfm.

Note: LSA = Labor Surplus Area.

This geographical distinction is also accompanied by demographic and economic differences (appendix table A.3). We find that labor force participation, white population share, median household income, poverty rate, and the share of people older than 25 who did not complete high school differ in a statistically significant manner by LSA status. LSAs have lower labor force participation rates, lower median income, higher poverty rates, lower educational attainment, and higher rates of residents identifying as white.

In non-LSA counties, our hypothesis is that the strong economy accompanying the lifting of an ABAWD waiver might pull some of these individuals out of SNAP as they find new employment or

increase work hours while others will be pushed off by the work-related time limit. In LSA counties that suffer from high unemployment, our hypothesis is that the former pull effect is weaker and the push effect is stronger. If we find no difference in the caseload impact, the push effect of reinstated work-related time limits is more important than the pull effect of a strong economy.

Our dataset is restricted to January 2017 through September 2018, and we exclude seven counties that had waivers lifted in 2016 because of improving economic conditions (an eighth county, McCracken, also initially had its waiver lifted at the same time, but that waiver was later reinstated) and would have already experienced initial changes in caseloads related to the three-month time limit expiring by January 2017. The seven counties excluded from the analysis (Bullitt, Daviess, Fayette, Hardin, Henderson, Jefferson, and Warren) also have some of the highest recent job growth in the state, according to Quarterly Census of Employment and Wages data from the Bureau of Labor Statistics.³⁵ From 2014 to 2017, job growth in Kentucky was about 3.7 percent. In six of the seven counties that rolled off in 2016, job growth beat that figure, posting gains of around 5 percent, except Warren County (which posted a 7.1 percent gain) and Bullitt County (16.8 percent). Henderson County's 1.3 percent decline was the only county in the set below the statewide statistic. Therefore, these areas may have experienced fewer exits related to economic challenges in meeting work requirements. Excluding these counties thus narrows the scope of the analysis.

BOX 4

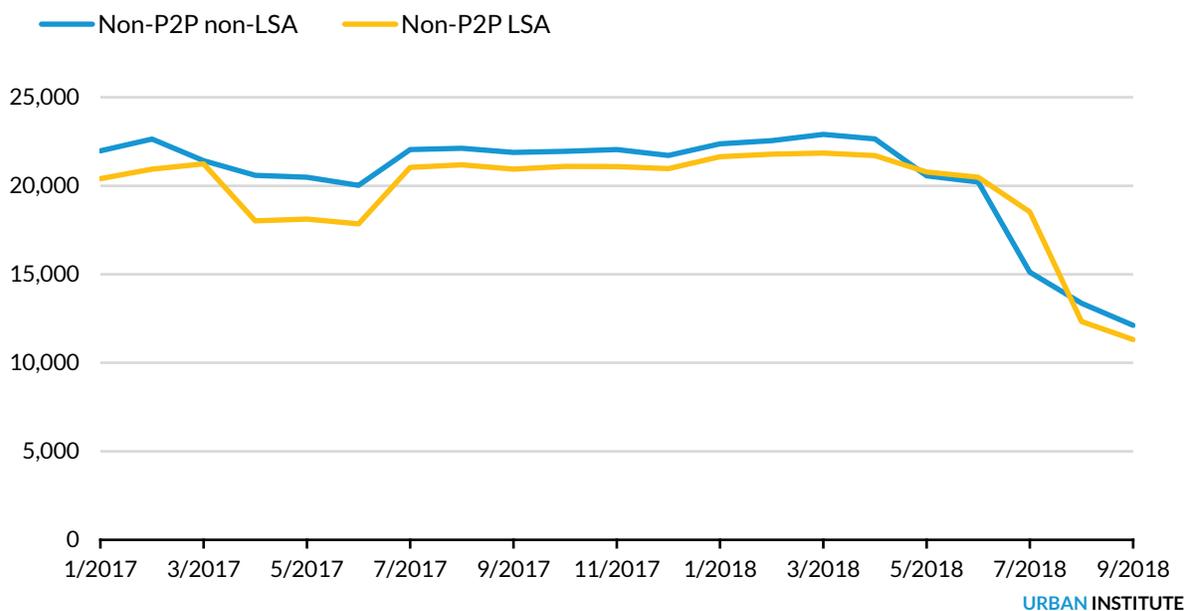
What Do We Know about the Counties Where Waivers Were Removed in 2016?

We do not have access to SNAP caseload data that allow us to observe directly what happened following the reinstatement of time limits in the seven populous and economically vibrant counties in 2016, but the Kentucky Equal Justice Center has reported that 7,149 people had lost SNAP benefits in the nine months following the policy change because of noncompliance with the ABAWD requirements.^a By January 2017, the remaining ABAWD caseload in these seven counties was 7,015 people, suggesting a nontrivial impact of the waivers being lifted even in job-rich areas.

^a"SNAP Able-Bodied Adults Exceptions," Legal Aid of the Bluegrass, accessed March 22, 2019, <https://lablaw.org/SNAP-able-bodied-adults>.

The ABAWD caseload has declined since 2017 regardless of LSA status (figure 8).³⁶ In LSAs, the ABAWD caseload declined by 9,087 people between January 2017 and September 2018. The non-LSAs, excluding the seven counties that had waivers lifted in 2016, saw an ABAWD caseload decline of 9,858 people.

FIGURE 8
ABAWD Caseload by LSA Status



Source: Kentucky Cabinet for Health and Family Services.

Notes: ABAWD = able-bodied adults without dependents; LSA = Labor Surplus Area; P2P = Paths to Promise. Excludes P2P counties and the seven counties that had waivers lifted in January 2016.

That said, population sizes are different in LSAs versus non-LSAs, with LSAs tending to be less populated and having smaller caseloads than non-LSAs. Thus, to examine whether the different level of economic vibrancy and individual demography that LSA status indicates has been matched with a more substantial caseload decline, we look at the caseload trend in percentage terms.

The caseload decline between the two groups of counties, however, is similar. In non-LSA counties, caseloads dropped by 9,858 people, or about 45 percent in relative terms, between January 2017 and September 2018. The non-Paths 2 Promise LSA counties across the rest of the state had an ABAWD caseload decline of 9,087 people, or 45 percent (appendix figure A.1).

Although consistent with our initial hypothesis that the push effect of reinstated work-related time limits is more important than the pull of a stronger economy, we cannot ignore that a stronger economy could also help able-bodied adults without dependents stay on SNAP by providing more work opportunities. In that case, we would hypothesize that LSAs should see a bigger caseload decline than non-LSAs and that finding no difference in the magnitude of caseload decline would potentially imply that able-bodied adults without dependents can find work regardless of the state of the economy. We view this as highly unlikely given the characteristics of able-bodied adults without dependents.

Furthermore, it does not necessarily mean that lifting ABAWD waivers does not impose undue hardship.

What we need to know, and what subsequent research should explore, is how those who have left SNAP following ABAWD policy changes are doing in strong and weak counties.

Discussion

This descriptive analysis suggests that reinstating the work-related time limit was associated with the loss of SNAP benefits for a large number of Kentuckians from January 2017 through September 2018. In an improving economy, we would expect that some SNAP participants, many of whom have already been working, would be better positioned to increase their work hours and earnings, either maintaining SNAP benefit eligibility or transitioning from benefit receipt. We do not have access to case-closure data on how many people may have left SNAP because they now earn more than the maximum income threshold and may be transitioning to a more stable financial situation. But the available data suggest that, in a short time, concentrated primarily in summer 2018, many able-bodied adults without dependents exited because they exhausted the three-month time limit. Of note are data that compare the rates of caseload decline among counties with similar economic challenges, but with different waiver statuses, indicating divergent rates of SNAP exit and a sharp decline in SNAP participation among counties with stricter work-related time limits.

SNAP is both an antipoverty tool and an important mechanism for addressing food insecurity, two challenges Kentucky has persistently faced (Islam, Minier, and Ziliak 2015; OPS 2013; Wheaton and Tran 2018). Food insecurity is also associated with poor health outcomes, including increased risk and poor management of chronic diseases, such as diabetes (Seligman et al. 2007; Seligman et al. 2012). Kentucky has among the highest rates of diabetes in the US.³⁷

The rapid loss of SNAP benefits associated with a policy change without clear evidence that individual well-being is improving is concerning and merits further evaluation and careful attention from policymakers. Although the statewide economy in Kentucky has improved, the extent of economic resiliency varies. Retaining waivers because of time limits may still protect people living in areas of disadvantage, and policymakers need to consider the realities of local economies.

The state believes that the impacts of lifting SNAP ABAWD waivers should be mitigated by its expansion of a voluntary E&T program designed to connect people in struggling areas with employment opportunities, job training, or other qualifying activities available across the state.³⁸ But research has

indicated that despite those aspirations, Kentucky continues to face significant limitations with ensuring E&T's availability and accessibility (Spalding 2019). And though the evaluation of the Paths 2 Promise demonstration project may point to important changes that could boost E&T responsiveness in areas of economic disadvantage, those results are not yet available, and expanding best practices would take additional time and resources once insights are available.

Future research is needed to more fully explore short- and long-term outcomes for people who lose SNAP benefits in the wake of changes to the ABAWD policy, including employment, income, and well-being. Absent that information, it is difficult for Kentucky to be able to reassure its residents that its policy changes are appropriately matched with its economic circumstances and to understand where future investments need to be made to promote low-income residents' well-being.

Appendix

Obtaining Caseload Data by County

SNAP caseloads by county in Kentucky were provided to Kentucky Voices for Health by the Kentucky Cabinet for Health and Family Services under an open-records request. Kentucky Voices for Health subsequently provided the data to the Urban Institute for further analysis. The data include total caseloads by county by month from January 2017 to September 2018 and disenrollment data by county by month from April 2017 to September 2018. All caseload calculations rely on this data source.

Classifying Counties by Characteristics

- **Labor Surplus Areas** are jurisdictions that have unemployment rates 20 percent above the national (including Puerto Rico) average, conditional on an employment rate no less than 6 percent. Fiscal year 2019 Labor Surplus Areas, last updated on September 18, 2018, are available at the Department of Labor website.³⁹ Although the LSA designation can be applied to any jurisdiction, we use only countywide designations.
- **Persistent Poverty Counties** are defined as areas in which 20 percent or more of residents are poor in the 1990 and 2000 Decennial Censuses and the 2011–15 American Community Survey. The list is available at <https://www.cdfifund.gov/Documents/PPC%20updated%20Oct.2017.xlsx>.
- **County economic and demographic characteristics** were accessed via American FactFinder and draw from the 2010 Decennial Census and American Community Survey five-year 2013–17 data.

Creating a Complete Dataset

All county characteristic data were merged into a single file based on county name and state name variables. The authors also merged the Labor Surplus Areas data into the SNAP caseload data based on county and state name to generate a caseload data file that could be broken down by the county's LSA status. Only LSAs that covered an entire county were matched in this procedure.

TABLE A.1

Table of County Roll-Offs of ABAWD Waivers

County	Date ABAWD waiver lifted	County	Date ABAWD waiver lifted	County	Date ABAWD waiver lifted
Adair	4/1/2018	Grant	2/1/2018	McLean	2/1/2018
Allen	3/1/2018	Graves	2/1/2018	Meade	3/1/2018
Anderson	2017	Grayson	3/1/2018	Menifee	5/1/2018
Ballard	2/1/2018	Green	4/1/2018	Mercer	4/1/2018
Barren	3/1/2018	Greenup	5/1/2018	Metcalfe	3/1/2018
Bath	5/1/2018	Hancock	2/1/2018	Monroe	3/1/2018
Bell	Exempt	Hardin	1/1/2016	Montgomery	5/1/2018
Boone	2/1/2018	Harlan	exempt	Morgan	5/1/2018
Bourbon	4/1/2018	Harrison	4/1/2018	Muhlenberg	2/1/2018
Boyd	5/1/2018	Hart	3/1/2018	Nelson	3/1/2018
Boyle	4/1/2018	Henderson	1/1/2016	Nicholas	4/1/2018
Bracken	5/1/2018	Henry	2017	Ohio	2/1/2018
Breathitt	5/1/2018	Hickman	2/1/2018	Oldham	2017
Breckinridge	3/1/2018	Hopkins	2/1/2018	Owen	2017
Bullitt	1/1/2016	Jackson	5/1/2018	Owsley	5/1/2018
Butler	3/1/2018	Jefferson	1/1/2016	Pendleton	2/1/2018
Caldwell	2/1/2018	Jessamine	2017	Perry	exempt
Calloway	2017	Johnson	5/1/2018	Pike	5/1/2018
Campbell	2017	Kenton	2/1/2018	Powell	4/1/2018
Carlisle	2/1/2018	Knott	5/1/2018	Pulaski	4/1/2018
Carroll	2/1/2018	Knox	exempt	Robertson	5/1/2018
Carter	5/1/2018	LaRue	3/1/2018	Rockcastle	4/1/2018
Casey	4/1/2018	Laurel	5/1/2018	Rowan	5/1/2018
Christian	2/1/2018	Lawrence	5/1/2018	Russell	4/1/2018
Clark	4/1/2018	Lee	5/1/2018	Scott	4/1/2018
Clay	Exempt	Leslie	exempt	Shelby	2017
Clinton	4/1/2018	Letcher	exempt	Simpson	2017
Crittenden	2/1/2018	Lewis	5/1/2018	Spencer	2017
Cumberland	4/1/2018	Lincoln	4/1/2018	Taylor	4/1/2018
Daviess	1/1/2016	Livingston	2/1/2018	Todd	2/1/2018
Edmonson	3/1/2018	Logan	2017	Trigg	2/1/2018
Elliott	5/1/2018	Lyon	2/1/2018	Trimble	2/1/2018
Estill	4/1/2018	Madison	4/1/2018	Union	2/1/2018
Fayette	1/1/2016	Magoffin	5/1/2018	Warren	1/1/2016
Fleming	5/1/2018	Marion	3/1/2018	Washington	3/1/2018
Floyd	5/1/2018	Marshall	2/1/2018	Wayne	4/1/2018
Franklin	2017	Martin	5/1/2018	Webster	2/1/2018
Fulton	2/1/2018	Mason	5/1/2018	Whitley	exempt
Gallatin	2/1/2018	McCracken	2/1/2018	Wolfe	5/1/2018
Garrard	4/1/2018	McCreary	4/1/2018	Woodford	2017

Source: Dustin Pugel, “Reinstating Time Limits for Food Assistance Will Hurt Low-Income Kentuckians and Local Economies,” *Kentucky Policy Blog*, Kentucky Center for Economic Policy, February 26, 2018, <https://kypolicy.org/reinstating-time-limits-food-assistance-will-hurt-low-income-kentuckians-local-economies/>.

Notes: ABAWD = able-bodied adult without dependents. Because of uncertainty as to the exact timing of the waivers that were lifted in 2017, we have provided only the year.

TABLE A.2

Count of ABAWDs and those Exhausting Time Limits by Month*Statistics from January 2017 through September 2018*

	1. Number of statewide ABAWDs	2. Number of ABAWDs ineligible because they have exhausted their 3-month time limit
Jan. 2017	59,152	2
Feb. 2017	61,705	1
Mar. 2017	61,382	2
Apr. 2017	60,674	63
May 2017	57,034	37
Jun. 2017	54,350	29
Jul. 2017	62,405	36
Aug. 2017	62,666	30
Sep. 2017	61,803	40
Oct. 2017	62,097	66
Nov. 2017	62,471	136
Dec. 2017	62,049	296
Jan. 2018	64,126	508
Feb. 2018	64,416	459
Mar. 2018	65,745	698
Apr. 2018	64,900	622
May 2018	61,695	921
Jun. 2018	61,202	3,402
Jul. 2018	52,902	1,721
Aug. 2018	44,474	2,231
Sep. 2018	41,081	1,822

Source: Kentucky Cabinet for Health and Family Services.**Note:** ABAWDs = able-bodied adults without dependents.

TABLE A.3

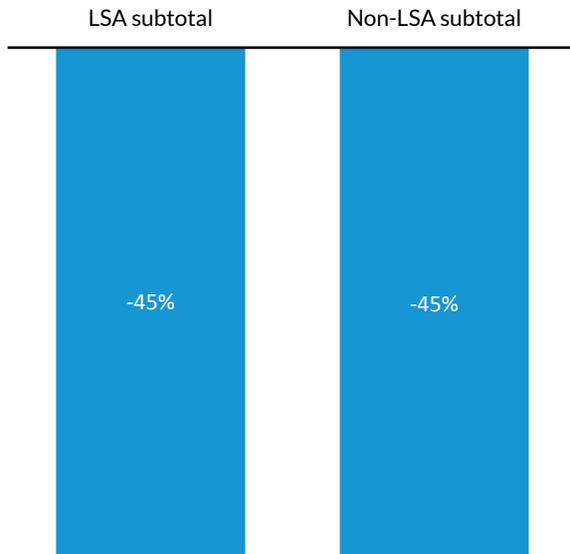
Characteristics of LSA versus Non-LSA Non-Paths 2 Promise Counties*Percent, except where noted*

	Non-LSA	LSA
Unemployment rate	3.7	4.4
Labor force participation rate among residents ages 16 and older	59.8	48.7
White population share	90.0	95.0
Median household income (\$)	50,992	36,060
Poverty rate	14.6	21.8
Residents older than 25 who did not complete high school	9.3	13.4
Residents older than 25 with only a high school diploma	34.5	39.4

Source: American Community Survey five-year 2013–17 data and 2010 Decennial Census.**Notes:** LSA = Labor Surplus Area. Excludes Paths 2 Promise counties and counties that had waivers lifted in January 2016. LSA designation lags more recent changes in unemployment but is deliberately designed to capture status over a 24-month period.

FIGURE A.1

Relative Declines in the ABAWD Caseload since January 2017, by County Type
As of September 2018



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Source: Kentucky Cabinet for Health and Family Services.

Notes: ABAWD = able-bodied adults without dependents; LSA = Labor Surplus Area. Excludes Paths 2 Promise counties and the seven counties that had waivers lifted in January 2016.

Notes

- ¹ Supplemental Nutrition Assistance Program: Requirements for Able-Bodied Adults without Dependents, 84 Fed. Reg. 980 (Feb. 1, 2019) (to be codified at 7 C.F.R. pt. 273).
- ² See also “New Program, Paths 2 Promise, Seeks SNAP Recipients to Participate in Pilot to Help Increase Earnings and Reduce SNAP Dependency,” Eastern Kentucky Concentrated Employment Program, February 17, 2016, <https://www.ekcep.org/new-program-paths-2-promise-seeks-snap-recipients-participate-pilot-help-increase-earnings-and>.
- ³ “Supplemental Nutrition Assistance Program Participation and Costs,” US Department of Agriculture, Food and Nutrition Service, accessed March 8, 2019, <https://fns-prod.azureedge.net/sites/default/files/pd/SNAPsummary.pdf>.
- ⁴ Time Limit for Able-Bodied Adults, 64 Fed. Reg. 48,257 (Sept. 3, 1999) (to be codified 7 C.F.R. pt. 273.24).
- ⁵ “Able-Bodied Adults without Dependents (ABAWDS),” US Department of Agriculture, Food and Nutrition Service, July 17, 2018, <https://www.fns.usda.gov/snap/able-bodied-adults-without-dependents-abawds>.
- ⁶ “Supplemental Nutrition Assistance Program (SNAP): Status of State Able-Bodied Adult without Dependents (ABAWD) Time Limit Waivers—Fiscal Year 2019—First Quarter,” US Department of Agriculture, Food and Nutrition Service, October 1, 2018, <https://fns-prod.azureedge.net/sites/default/files/snap/FY19-Quarter1-ABAWD-Waiver-Status.pdf>.
- ⁷ Food Stamp Program: Personal Responsibility Provisions of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, 66 Fed. Reg. 4,437 (Jan. 17, 2001) (to be codified at 7 C.F.R. pts. 272–3).
- ⁸ “Unemployment Insurance Extended Benefits, US Department of Labor, Employment and Training Administration, July 10, 2015, <https://oui.doleta.gov/unemploy/extenben.asp>.
- ⁹ “Labor Surplus Area: Fiscal Year (FY) 2019 Labor Surplus Areas (LSA),” US Department of Labor, Employment and Training Administration, October 5, 2018, https://www.doleta.gov/LSA/eta_default.cfm.
- ¹⁰ See FNS (2016). Meeting the criteria for additional weeks of extended benefits under the unemployment insurance system can also qualify an area for a waiver. Other criteria, used more sparingly and at the discretion of the secretary of agriculture, can be used to establish grounds for granting a waiver: for example, a low and declining employment-to-population ratio.
- ¹¹ See Rowe, Brown, and Estes (2017). This includes the types of services provided, which tend to focus on job search rather than intensive training and skill development that might improve long-term outcomes. It also includes the inadequacy of program funding.
- ¹² Supplemental Nutrition Assistance Program: Requirements for Able-Bodied Adults without Dependents 84 Fed. Reg., 980 (February 1, 2019).
- ¹³ Supplemental Nutrition Assistance Program: Requirements for Able-Bodied Adults without Dependents 84 Fed. Reg., 980 (February 1, 2019).
- ¹⁴ Catherine Boudreau, “USDA Will Clamp Down on Work Rules for Food-Stamp Recipients,” *Politico*, December 20, 2018, <https://www.politico.com/story/2018/12/20/food-stamp-rules-1045255>.
- ¹⁵ Supplemental Nutrition Assistance Program: Requirements for Able-Bodied Adults without Dependents 84 Fed. Reg., 980 (February 1, 2019).
- ¹⁶ Supplemental Nutrition Assistance Program: Requirements for Able-Bodied Adults without Dependents 84 Fed. Reg., 980 (February 1, 2019).

- ¹⁷ Phil Galewitz, “Judge Vows to Rule on Medicaid Work Requirements by End of March,” *Kaiser Health News*, March 14, 2019, <https://khn.org/news/judge-vows-to-rule-on-medicaid-work-requirements-by-end-of-march/>.
- ¹⁸ Lauren Bauer, “Workers Could Lose SNAP Benefits under Trump’s Proposed Rule,” *Up Front* (blog), Brookings Institution, December 20, 2018, <https://www.brookings.edu/blog/up-front/2018/12/20/workers-could-lose-snap-benefits-under-trumps-proposed-rule/>.
- ¹⁹ “What IS SNAP E&T?” US Department of Agriculture, accessed March 22, 2019, <https://snaptoskills.fns.usda.gov/about-snap-skills/what-is-snap-et>.
- ²⁰ “Quick Facts: Kentucky,” US Census Bureau, accessed March 22, 2019, <https://www.census.gov/quickfacts/ky>. “Supplemental Nutrition Assistance Program: Number of Persons Participating (Data as of March 8, 2019),” US Department of Agriculture, Food and Nutrition Service, accessed March 22, 2019, <https://fns-prod.azureedge.net/sites/default/files/pd/29SNAPcurrPP.pdf>.
- ²¹ See also “Poverty Guidelines,” US Department of Health and Human Services, Office of the Assistance Secretary for Planning and Evaluation, accessed March 22, 2019, <https://aspe.hhs.gov/poverty-guidelines>.
- ²² Urban Institute calculations using Supplemental Poverty Measure estimates from the Transfer Income Model Version 3 (TRIM3) for calendar years 2014 to 2016.
- ²³ “State Releases September 2018 Unemployment Report,” *The Lane Report*, October 18, 2018, <http://cber.uky.edu/news/2018/state-releases-september-2018-unemployment-report>.
- ²⁴ “Local Surplus Area: Fiscal Year (FY) 2019 Labor Surplus Areas (LSA),” US Department of Labor, Employment and Training Administration, last updated October 3, 2018, https://www.doleta.gov/LSA/eta_default.cfm. Although being a Labor Surplus Area is a criterion for qualifying for an ABAWD waiver, the count of counties that “could have qualified for waivers” is higher because it includes additional counties that are not LSAs but that have unemployment rates above 120 percent of the national average for 2016 and 2017.
- ²⁵ Figure 3 uses the most recent 24-month period unemployment averages (2016–17) by county in Kentucky, compared with the national average and the fiscal year 2019 Labor Surplus Area list. If a county was listed as an LSA or had a 24-month unemployment rate more than 20 percent above the national average (in excess of 5.58 percent), it was deemed to have met the requisite criteria to qualify for an ABAWD waiver. Sources for 2016 and 2017 annual unemployment rates come from the Local Area Unemployment Statistics (LAUS) available at “Local Area Unemployment Statistics,” Bureau of Labor Statistics, accessed March 22, 2019, <https://www.bls.gov/lau/>.
- ²⁶ Josh James, “Report: Locked-Out SNAP Recipients Face Barriers to Returning,” Morehead State Public Radio, January 16, 2019, <https://www.wmky.org/post/report-locked-out-snap-recipients-face-barriers-returning>; Adam Beam, “10,000 Lose Access in Kentucky to Food Assistance Program,” Associated Press, November 21, 2018, <https://www.apnews.com/e790db22c81347a483bce2ed896fc642>; Kentucky Cabinet for Health and Family Services, “Commonwealth Makes Job Training Programs Available to Help Able-Bodied Adults without Dependents (ABAWDs) Find Work and Maintain Eligibility for SNAP,” news release, December 15, 2017, <https://chfs.ky.gov/News/Documents/nr12152017.pdf>.
- ²⁷ Kentucky Voices for Health subsequently provided these data to the Urban Institute for additional analysis. Although most of the waivers were lifted on a rolling basis from late 2017 to September 2018, we observe a significant reduction in caseloads across almost all counties in June 2018. Both Kentucky Voices for Health and Urban contacted the cabinet to clarify whether there were any indications of the reason for this pattern, which is atypical compared with summer 2017. The cabinet provided no clarifications or data updates, so we conducted the analysis with the original data.
- ²⁸ This is according to the latest administrative data from September 2018.
- ²⁹ Among people not classified as able-bodied adults without dependents, the decline in caseloads is smaller, 10 percent. This is because able-bodied adults without dependents make up a small share of the overall caseload.

- ³⁰ See “Labor Market Information Report Library,” Kentucky Center for Statistics, accessed March 22, 2019, <https://kystats.ky.gov/KYLMILMI>. Local Workforce Development Areas are groupings of counties that the state has generated to funnel Workforce Innovation and Opportunity Act funds across the state in the most equitable manner. These designations are based on a comprehensive analysis of Kentucky’s labor markets.
- ³¹ We ran a two-tailed t-test with equal variance on the county characteristics dataset.
- ³² The reference period is the most recent period for which data are available. The fiscal year 2019 list starts in January 2016 and ends in December 2017.
- ³³ “Alternative Measures of Labor Utilization for States, 2018 Annual Averages,” Bureau of Labor Statistics, last updated January 25, 2019, <https://www.bls.gov/lau/stalt.htm>.
- ³⁴ The overall unemployment rate obscures the picture for some groups that may include able-bodied adults without dependents, such as African Americans and people with limited educational attainment. Among African Americans, the national February 2019 unemployment rate was 7 percent, about 1.8 times the overall rate of 3.8 percent in the same month. See <https://data.bls.gov/timeseries/LNS14000006>. For those with less than a high school diploma, the rate is 5.3 percent as of February 2019. Those with a high school diploma had an unemployment rate of 3.8 percent in February 2019, in line with the national average. See “Unemployment Rates for Persons 25 Years and Older by Educational Attainment,” Bureau of Labor Statistics, accessed March 22, 2019, <https://www.bls.gov/charts/employment-situation/unemployment-rates-for-persons-25-years-and-older-by-educational-attainment.htm>.
- ³⁵ “Quarterly Census of Employment and Wages,” Bureau of Labor Statistics, accessed March 22, 2019, <https://www.bls.gov/cew/>.
- ³⁶ This excludes Paths 2 Promise areas and areas that had waivers lifted in 2016.
- ³⁷ “Diabetes in the United States,” The State of Obesity, accessed March 22, 2019, <https://www.stateofobesity.org/diabetes/>.
- ³⁸ Kentucky Cabinet for Health and Family Services “Commonwealth Makes Job Training Programs Available to Help Able-Bodied Adults without Dependents (ABAWDs) Find Work and Maintain Eligibility for SNAP,” news release, December 15, 2017, <https://chfs.ky.gov/News/Documents/nr12152017.pdf>; “Kentucky Agencies Work Together to Provide Employment and Training Opportunities to SNAP Recipients,” news release, January 8, 2018, <https://kentucky.gov/Pages/Activity-stream.aspx?n=EducationCabinet&prId=197>.
- ³⁹ “Local Surplus Area: Fiscal Year (FY) 2019 Labor Surplus Areas (LSA),” US Department of Labor, Employment and Training Administration, last updated October 3, 2018, https://www.doleta.gov/LSA/eta_default.cfm.

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