

RESEARCH REPORT

# SNAP Work Requirements in Arkansas for Adults without Dependents or Disabilities

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# Executive Summary

Arkansas made the news when, in June 2018, it became the first state to require work or community engagement for Medicaid enrollees. But less attention has been paid to the 2016 reinstatement of work-related “time limits” on nutrition assistance in Arkansas, though this policy change could negatively affect program participants’ lives.

The Supplemental Nutrition Assistance Program (SNAP), formerly known as food stamps, provides noncash benefits to low-income households for purchasing food. Able-bodied adults ages 18 to 49 without dependents, sometimes called “ABAWDs” (able-bodied adults without dependents), are required to work or engage in employment and training activities to access SNAP for longer than three months in three years. Arkansas calls this the “requirement to work.”

To learn more about the implementation and implications of the SNAP work-related time limits for people subject to ABAWD rules, we visited three communities in Arkansas and conducted key informant interviews with directors of local workforce centers, SNAP Employment and Training program service providers, and state SNAP officials within the Arkansas Department of Human Services. We also conducted focus groups with people who had participated in SNAP in the past three years and were likely subject to the ABAWD time limit. Our interviews found the following:

- ***SNAP participants and service providers are confused about work requirement rules.*** Though work requirements intend to encourage people to find a job, many SNAP participants in our focus groups said they felt confused and disempowered by the requirements and lacked help and information. The people who talked with us typically knew about SNAP work requirements but said they were unclear on the details, and unclear communication and other administrative barriers made it hard for them to understand how to comply. These limitations require SNAP participants to either navigate the system on their own or rely on service providers who also may not understand the work requirement.
- ***SNAP participants have limited access to jobs, training, and other support services.*** For work requirements in public assistance programs to promote sustained employment among participants, states need a work support service infrastructure that helps people access higher-quality jobs. However, when SNAP participants in our focus groups discussed their experiences with work and training, they emphasized the challenges to accessing steady jobs with living wages and obtaining training to help them access better jobs. The education and training opportunities available to people subject to the ABAWD work requirement are often limited to

soft-skill training and basic work readiness supports. Though these services are vital to some participants, they are not what many people need to get jobs or advance toward higher-paying careers. The administrative challenges and structural barriers to complying with the work requirement have caused some participants to lose access to SNAP, disrupting their already tight budgets and forcing them to choose between basic necessities.

- ***Policy and administrative changes would benefit program participants.*** Our conversations with service providers and focus group participants suggested several changes that would benefit program participants, including clearer communication from the Arkansas Department of Human Services, better access to education and training opportunities, improved transportation infrastructure, and more broadly, a stronger safety net. Nonetheless, limited availability of high-quality jobs could pose a formidable obstacle even if the suggested strategies were implemented.

Many SNAP participants and service providers agreed that people should work if they can but questioned the value of the requirement to work in light of real-life challenges that complicate compliance and can lead to people losing access to vital nutrition assistance.

# SNAP Work Requirements in Arkansas for Adults without Dependents or Disabilities

**Work requirements made the news in June 2018 when Arkansas became the first state to require work or community engagement for Medicaid enrollees. But less attention has been paid to the 2016 reinstatement of work-related time limits on nutrition assistance in Arkansas, though this policy change could negatively affect program participants' lives.**

The Supplemental Nutrition Assistance Program (SNAP), formerly known as food stamps, provides noncash benefits to low-income households for purchasing food. Under SNAP's work-related time limit, able-bodied adults ages 18 to 49 without dependents, sometimes called "ABAWDs" (able-bodied adults without dependents; box 1), must work or engage in employment and training activities to access SNAP for longer than three months in three years. But states can request waivers for these work-related time limits in part or all of the state when unemployment is high. At the height of the Great Recession, and in the years of persistently high unemployment afterward, about 90 percent of SNAP participants considered ABAWDs were covered by waivers and not subject to the work-related time limits (Bolen and Dean 2018). The ABAWD time limit is in addition to a general work requirement under which nonexempt able-bodied adults ages 16 to 59 must register to work, accept a job if offered, and not quit a job without good cause.

Though ABAWD seems to imply these adults do not have physical or mental health barriers to work, many may face significant challenges obtaining work. And the second half of the term, "without dependents," can also be a misnomer; people in this category may have other caregiving responsibilities or support children not in their custody.

The share of the US population living in counties that have waived the SNAP ABAWD time limit dropped below 40 percent in 2017, leaving over 60 percent of the US population living in counties where the SNAP ABAWD time limit applies (Bolen and Dean 2018). An improved economy and lower unemployment have helped reduce the number of waivers, but states have also voluntarily removed waivers, even when economic conditions meet waiver criteria. In 2016, Arkansas decided not to reapply

for its waiver though several counties likely could have secured an exemption based on their unemployment rates.<sup>1</sup>

Arkansas is also considering legislation that would require SNAP participants not complying with the general work requirement to participate in the SNAP Employment and Training (SNAP E&T) program, which aims to help participants gain work skills and experience. States have flexibility to determine the services SNAP E&T offers and the SNAP participants it serves. Of the 6.1 million SNAP participants nationwide subject to the general work requirement in the average month of fiscal year (FY) 2016, only 200,000 were served by SNAP E&T (GAO 2018). People subject to the ABAWD time limit are a subset of those subject to the general work requirement. Under Arkansas's proposed legislation, the SNAP E&T program would be mandatory for participants ages 19 to 59, except for parents of children under age 6, those unable to work because of a disability or participation in drug or alcohol rehabilitation, and those subject to the time limit or otherwise exempt from the general work requirement.<sup>2</sup> This legislation would require adults ages 50 to 59 and parents of children ages 6 to 17 to participate in E&T activities to receive SNAP benefits.

To learn more about the implementation and implications of the SNAP work-related time limits for people subject to ABAWD rules, we visited three communities in Arkansas and conducted key informant interviews with directors of local workforce centers, SNAP E&T service providers, and state SNAP officials with the Arkansas Department of Human Services (DHS). We also conducted focus groups with people who had participated in SNAP in the past three years and were likely subject to the ABAWD time limit.

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## BOX 1

### Definitions

**Able-bodied adults without dependents (ABAWDs):** People ages 18 to 49 not responsible for the care of a child or incapacitated household member, not pregnant, and not medically certified as physically or mentally unfit for employment.

**ABAWD work requirements for SNAP:** People subject to ABAWD rules, with some exceptions, must work or participate in qualifying education or training activities, such as the state's SNAP E&T program, for at least 80 hours a month to maintain access to SNAP benefits for longer than three months in three years. People are exempt from the time limit if they are under age 18, over age 49, pregnant, disabled, caring for a child or disabled family member, or already exempt from general SNAP work requirements. Arkansas formally refers to this policy as the requirement to work. In this report, we refer to the SNAP ABAWD rules as the requirement to work, work-related time limits, and work requirements interchangeably.

**SNAP ABAWD waivers:** States can request temporary federal waivers of the ABAWD time limit for counties with an unemployment rate 20 percent higher than the national average in the most recent 24-month period, with an unemployment rate 10 percent higher than the national average in the most recent 12-month period, or otherwise lacking jobs. The administration has proposed, but not finalized, a rule that would limit the use of waivers and encourage broader application of the ABAWD work requirement.<sup>a</sup>

**general work requirement:** Federal rules require able-bodied SNAP recipients ages 16 to 59 register to work, accept a job if offered, and not quit a job without good cause. Adults are exempt from the general work requirement if they are disabled, caring for disabled family members, caring for children under age 6, participating in treatment or rehabilitation, or enrolled in school, training, or higher education at least half time (Falk, McCarty, and Aussenberg 2014).

**SNAP Employment and Training (SNAP E&T) program:** SNAP E&T aims to help participants gain work skills and experience.<sup>b</sup> States vary considerably in what services SNAP E&T offers and which SNAP participants are served. People subject to the ABAWD time limit may voluntarily access SNAP E&T services.

**Notes:** For more information, see <https://www.fns.usda.gov/snap/ABAWD>.

<sup>a</sup> 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).

<sup>b</sup> For more information, see <https://www.fns.usda.gov/snap/et>.

# Methods

We conducted semistructured individual interviews and focus groups in Arkansas during February and March 2019. We conducted five phone interviews with state SNAP officials, community organizations, and policy researchers addressing food insecurity; in-person interviews with 17 SNAP E&T service providers and directors of local workforce centers; and four focus groups with 42 people who received SNAP at the time of the focus group or within the past three years and were likely subject to ABAWD rules.

Our semistructured interviews included core questions and topics that asked respondents about the following topics:

- implementation of the ABAWD time limit
- how well people subject to the rules understand them
- access to employment and training resources
- experiences and outcomes of the ABAWD time limit, including observations of people losing access to SNAP or Medicaid
- the SNAP work-related time limit generally
- suggestions for improving SNAP, employment opportunities, community resources, or personal circumstances

Our focus group guides included core questions and topics that asked respondents about the following topics:

- history of SNAP participation
- understanding of and experiences with the SNAP work requirement or time limit, including the three-year clock, coordination with Medicaid work requirements, and general SNAP program rules
- access to employment and training resources
- outcomes of SNAP participation and work-related time limits
- suggestions for improving SNAP, employment opportunities, community resources, or personal circumstances

To recruit SNAP participants for the focus groups, we asked community partner organizations in each community to invite clients (in person or via flyers, email, or phone) to participate if they were 18 to 49 years old, received SNAP any time in the past three years, were not living with children, and were not disabled. All focus group participants received a thank-you gift of \$40 cash and were offered food at

the time of the discussion. Community partner staff members agreed to keep focus group participants' names confidential. Before each focus group and interview started, we followed informed consent procedures approved by the Urban Institute Institutional Review Board. All interview and focus group participants spoke to us voluntarily and were assured that their identities would be protected.<sup>3</sup> With their consent, we digitally recorded the discussions and took notes. Focus group participants also voluntarily completed a profile questionnaire on basic demographic characteristics, program participation, food insecurity, and housing costs. The profile questionnaires were anonymous and not linked to their interview responses. All 42 focus group participants also completed the profile questionnaire, though not every participant answered every question.

We selected the three Arkansas communities, Fort Smith, Little Rock, and West Memphis, based on a desire for geographic and economic diversity and community organizations' and service providers' willingness to participate in interviews and assist with recruiting for focus groups. Because of the recruiting method, the people participating in the focus groups do not necessarily represent SNAP participants subject to ABAWD rules across the state. For example, most focus group participants in Little Rock lived in a homeless shelter, most in West Memphis were very recently referred to the SNAP E&T program, and most in Fort Smith were recruited from a group of people accessing food pantry services.

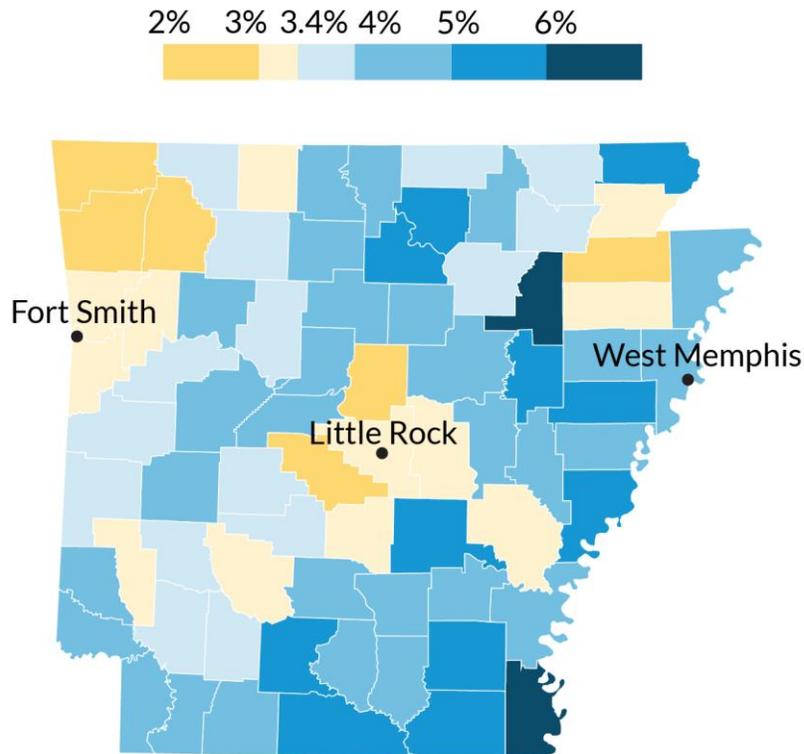
We analyzed the results of the focus groups and interviews using commonly accepted qualitative research methods. We carefully reviewed interview and focus group notes, referring to the recordings as needed for clarity. We categorized interview and focus group responses using an analytical framework that mirrored the content of the interview protocol and focus group moderator's guide, using NVivo qualitative analysis software to facilitate this process for the focus group responses. We noted and summarized dominant themes, divergent opinions, and participants' experiences. Finally, we selected relevant quotations based on frequency and richness to illustrate key points.

## Arkansas Sites

We conducted interviews with service providers and focus groups with SNAP participants in Fort Smith, Little Rock, and West Memphis, Arkansas. Though the county economic conditions in these communities varied, none were considered "labor surplus areas," a US Department of Labor designation for areas with persistently higher unemployment. Only one of the cities, West Memphis, had an unemployment rate noticeably above the statewide rate of 3.4 percent in March 2019 (figure 1). The economic hardships described by the people we interviewed, therefore, may not be as severe as those

experienced by residents elsewhere in the state. That said, residents of color and those with limited education have an elevated unemployment rate: the unemployment rate among African American people is more than double that for white people in Arkansas,<sup>4</sup> and people with less education tend to have higher levels of unemployment nationwide.<sup>5</sup>

**FIGURE 1**  
**Arkansas Unemployment Rates, March 2019**



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**Source:** Bureau of Labor Statistics local area unemployment statistics, available at <https://data.bls.gov/lausmap/showMap.jsp>.

**Notes:** The average statewide unemployment rate in Arkansas in March 2019 was 3.4 percent; counties denoted in blue had an unemployment rate higher than the state average, and those in yellow had an unemployment rate below the state average.

## Demographics

To compare the people we interviewed in Arkansas with national averages for all nondisabled adults enrolled in SNAP in households without children, we collected information from respondents on various demographic and work-effort metrics (table 1). A greater share of our study participants was male, African American, and currently employed than the average adult classified as an ABAWD nationwide

or in Arkansas. In addition, though more study participants were working than the national average, a substantial share of these workers was still employed less than 20 hours per week, putting them at risk of not meeting the work requirement. Other research suggests these workers may not have control over the number of hours they work each week because of employers' scheduling practices. More than half of workers ages 18 to 64 report little or no control over the total hours they work each week. This lack of control over work schedules is even greater for workers who participate in safety net programs, such as SNAP, and greatest among safety net program participants who do not have dependent children, such as those classified as ABAWDs (Karpman, Hahn, and Gangopadhyaya 2019).

**TABLE 1**

**Comparison of Focus Group Participants with All Nondisabled Adult SNAP Participants in Households without Kids, Nationally and in Arkansas**

	Arkansas focus group participants	All Nondisabled Adult SNAP Participants in Households without Kids	
		Nationally	Arkansas
Female	40%	44%	43%
Median age	40–49	31	32
At least a high school diploma	79%	66%	n/a
African American	50%	31%	41%
White	43%	43%	54%
Hispanic	5%	12%	1%
Medicaid enrollee	48%	n/a	n/a
Employed	45%	24%	20%
Employed working fewer than 20 hours	37%	35%	39%

**Sources:** Data on Arkansas focus group participants are from the profile questionnaire completed by focus group participants in February and March 2019. Data on all nondisabled adult SNAP participants in households without kids in the US and Arkansas are from Urban Institute tabulations of fiscal years 2014 and 2015 quality control SNAP data, available at <https://www.fns.usda.gov/resource/snap-quality-control-data>.

**Notes:** n/a = not available. All 42 focus group participants completed the profile questionnaire, but not every participant answered every question. About 9.1 and 10.6 percent of the national quality control data do not report education level and race, respectively. For Arkansas, about 25.56 and 3.32 percent do not report education level and race, respectively. We do not report tabulations for those with at least a high school degree in Arkansas because of missing data. Employment variables measured current employment status at the time of the questionnaire or survey.

## About This Report

In the remainder of this report, we share what we learned about how SNAP work-related time limits work in practice: what SNAP participants and service providers understand about the work requirement; what jobs, training, and support services are available to SNAP participants, including how SNAP E&T operates in the state; and whether people are losing SNAP benefits because of problems

complying with the requirements. We also share strategies offered by people with firsthand experience with the SNAP work-related time limits.

## SNAP Participants and Service Providers Are Confused and Lack Knowledge about Work Requirement Rules

Work requirements are intended to encourage people to find a job, but many SNAP participants in our focus groups said they felt confused and disempowered by the requirements and lacked help and information. The people who talked with us typically knew about the SNAP work requirements but said they were unclear on the details, and administrative barriers and unclear communication made it hard for them to understand how to comply. These limitations require SNAP participants to either navigate the system on their own or rely on service providers who also may not understand the work requirement rules. Limited literacy rates and access to broadband internet present additional barriers to complying with work requirements. In Arkansas, nearly 14 percent of people ages 16 and older lack basic literacy skills, and 32 percent of all Arkansas residents are underserved by internet coverage.<sup>6</sup> Of all 50 states, Arkansas has the lowest share of residents with broadband internet.<sup>7</sup>

### ABAWD Work Rules

SNAP participants in our focus groups generally knew of work requirements but were confused about the rules and how they were applied. SNAP participants subject to ABAWD rules must, with some exceptions, work or participate in qualifying education or training activities for at least 80 hours a month to maintain access to SNAP benefits for longer than three months in three years, a rule Arkansas calls the requirement to work.

SNAP participants were unclear about which activities, beyond employment, counted toward the 80-hour-a-month requirement and how many hours of each activity counted toward the requirement. According to the “SNAP Works: Employment and Training Provider Handbook,” people can comply with the requirement to work in several ways, including working, searching for a job, participating in unpaid work experience, or by receiving training.<sup>8</sup> Contributing to SNAP participants’ confusion, these activities count for different amounts of time. For example, making three contacts with potential employers in a week while job searching counts for nine hours toward the 80-hour-a-month work requirement but can account for no more than half of a person’s monthly hours (table 2).

TABLE 2

Activity Hours for Able-Bodied Adults without Dependents in Arkansas

Activity	Formula	Allowable monthly hours
Independent job search	3 weekly job contacts equal 9 hours	Fewer than 40
Job search training (job club, employment counseling)	3 weekly job contacts equal 9 hours	Fewer than 40
Vocational training (credit-bearing courses)	1 credit hour equals 3 weekly hours	80
Occupational training	1 hour of instruction equals 3 weekly hours	80
GED/basic skills/literacy	1 hour of instruction equals 3 weekly hours	80
English as a second language classes	1 hour of instruction equals 3 weekly hours	80
On-the-job training/apprenticeship	1 hour equals 1 hour	80
Work experience (unpaid)	SNAP benefits divided by state or federal minimum wage (whichever is greater)	

Source: Arkansas Department of Human Services “SNAP Works: Employment and Training Provider Handbook.”

Notes: GED = general education development.

Focus group SNAP participants reported difficulty trying to get information about how to comply with the work requirement, which left them feeling frustrated and disempowered. They said they looked online for help and information about the SNAP work requirement, but the DHS website did not provide sufficient information to help them successfully navigate the system. SNAP participants also contacted DHS caseworkers but found it difficult to reach them in person or on the phone in a timely manner. Many SNAP participants said they scheduled phone interviews only to have the caseworker call early or late. SNAP participants who could not accommodate these last-minute changes because of inflexible work or training schedules missed their opportunity to speak with a caseworker.

*“The only time you hear from them is when they are ready to take SNAP from you.”*

*—SNAP participant*

Some SNAP participants in our focus groups said they turned to service providers for help, but often those providers did not know the work requirement policy details. Some service providers we interviewed solely focused on providing job-related services and training and, therefore, said they did not feel they needed to understand the SNAP work requirement or tailor their services to meet the

requirement. A couple SNAP E&T providers learned about the work requirement and the associated processes to guide their clients but said the effort was time consuming.

“I probably spent a better part of a year just working really hard trying to figure out what [DHS] wants us to do,” one service provider said. That service provider not only tried to ensure her clients received the training they needed to be successful but specifically tailored clients’ training and employment schedules to meet the 80-hours-a-month requirement. Most service providers, however, said they did not have the time or expertise to take on the additional effort of guiding clients through the SNAP work requirement process.

We also found a profound lack of knowledge among SNAP participants and service providers regarding how the three-year time limit functions in Arkansas. As previously noted, ABAWD rules limit noncompliant participants to receiving only three months of SNAP benefits within three years. States implementing time limits use various mechanisms for tracking benefit eligibility over this period. Arkansas uses a fixed statewide clock, meaning each person is subject to the same three-year period, which restarted in January 2019. When the three-year clock restarted, every person who had used up their three months of SNAP benefits could reapply. Though the date is included in the DHS notification letters, only the state DHS administrators, and none of the SNAP participants or service providers we spoke with, knew the statewide fixed clock had restarted in January.

## **Notifications**

SNAP participants in our focus groups reported that they did not receive clear guidance from DHS about the steps necessary to meet the requirement to work, and the letters they received from DHS were hard to understand. According to state DHS administrators and documents, new SNAP participants learn about the work requirements during their intake interview with a DHS caseworker, who determines whether the client meets the ABAWD criteria and is subject to the work requirement or qualifies for an exemption. When a DHS caseworker determines that a SNAP participant meets the ABAWD criteria and is not currently complying with the work requirement, they code the client as “mandatory.” Clients with mandatory status risk losing SNAP benefits if they do not comply with the work requirement. The caseworker explains the rules and enters the ABAWD designation into the state’s automated system, triggering a series of automated letters. The first letter notifies clients of the requirement and arrives with a referral letter and a list of SNAP E&T providers where clients may voluntarily seek help finding training, securing employment, and reporting their hours to DHS. (Existing SNAP participants who were not subject to the work requirement at the intake interview but later

became subject to it or were complying but fell out of compliance later will receive a letter notifying them of their change in status and need to report to a DHS office.) If people coded as mandatory continue not to comply with the work requirement, DHS's automated system sends out notification letters once a month for three months as participants approach the time limit. DHS sends clients five letters before they lose benefits.

However, because of beneficiaries' sometimes frequent moves and address changes, sending notification letters through the mail was not always effective. Both SNAP participants and community service providers reported not only that the letters were confusing but that they routinely arrived late. During our focus groups, SNAP participants said they have received their notification letters late, past the date of a scheduled appointment, or even after DHS had terminated their benefits. Service providers also expressed frustration at their inability to help clients who are denied services because of late notice letters. One SNAP participant reported moving four times in the past year and, consequently, missing an important notification about her benefits expiring.

## Reporting

Further, focus group participants said the mechanisms for reporting participation in work activities to DHS were unclear and challenging to navigate. According to DHS, SNAP participants subject to ABAWD rules can submit documentation to DHS via fax, mail, or scan or in person at a DHS county office. In addition to reporting their hours directly to DHS, SNAP participants participating in the SNAP E&T program can report their program hours through the SNAP E&T provider. SNAP E&T providers use the state's SNAP Works website to update their clients' work histories and communicate their work hours to DHS. If clients report their hours using this method, they still must separately provide DHS with documentation of employment or other compliance activities because the SNAP Works website does not have an option to upload the documentation directly. Some SNAP participants in our focus groups thought they didn't need to report their employment hours to DHS because they believed their employers were doing so. In fact, DHS subscribes to The Work Number, an Equifax service that allows them to verify a client's employment and income. However, this reporting option is only available if the client's employer uses the service. Though one SNAP E&T provider and several focus group participants mentioned The Work Number, we do not know how much employers use the service.

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*“It is amazing when I get a client who is just really on top of it and just totally knows [the SNAP work requirement rules]...But a lot of people are either uncomfortable or they don’t realize that this will be required of them and how on top of it they will need to be.”*

*—SNAP E&T provider*

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## **Exemptions**

SNAP participants in our focus groups rarely knew they could request an exemption from the work requirement if they met one or more qualifying exemptions. Only a couple of the 42 SNAP participants in our focus groups said they had experience with exemptions or knew whether they qualified for one. When asked if they had been told whether their homelessness may have indicated they qualified for an exemption from the work requirement, one focus group participant said, “My understanding was that if you were homeless, you are still subject to the work requirement.” Another said, “No, you have to either be looking for work or in some kind of work training program or something like that. When I first applied for food stamps, I was homeless, and it wasn’t long after I applied that I got into the culinary training program here.” The lack of understanding about exemptions is particularly relevant because 16 of the 42 focus group participants reported being homeless or living in a shelter or transitional housing facility, which, according to some service providers, could indicate they may qualify for a short-term exemption. However, we do not know the details of their cases.

Arkansas grants exemptions from work-related time limits for several circumstances, including receiving disability payments, participating in a drug or alcohol treatment program, and being mentally or physically unfit for employment, according to our interview with DHS officials and DHS’s work registration and requirement to work exemptions checklist tool.<sup>9</sup> The state also grants a limited number of one-month exemptions for people leaving foster care, domestic violence shelters, prisons, and drug treatment programs. SNAP participants in Arkansas may receive up to three one-month exemptions. If clients believe they should be exempt, they must file an exemption request directly with DHS or a SNAP E&T provider. If they file through a SNAP E&T provider, the provider then submits a request to the county DHS office for review.

In addition, DHS caseworkers are expected to manually review their list of mandatory referrals to identify those who have “aged out” of their ABAWD status or should otherwise be exempt from the ABAWD work rules, because the system does not automatically detect these changes.

## Bureaucratic Processes

In addition to confusion and frustration with specific policies, focus group participants and service providers described feeling overwhelmed with the bureaucratic process in general. "Often, you will schedule one thing and then you will have to come back. Or you'll go in to apply and you will have to come back later for an assessment; then you'll have to schedule an interview. There's just so many layers," a service provider said. The service provider continued, saying, "Just even cutting that down to you work with one person who knows what you qualify for [and] explains all of this stuff to you. If a work requirement applies to you, communicating that. The case management at DHS just isn't case management. It is compliance monitoring." Given the concurrent implementation of work requirements for Medicaid and SNAP, participants expressed frustration at the amount of time required to prove their need for assistance and cooperation with work requirements in both programs.

Further, SNAP focus group participants sometimes felt the effort needed to navigate the bureaucracy and comply with work requirements outweighed the value of their SNAP benefits and could be avoided if they received more assistance finding employment. A SNAP participant said, "You are saying I got to do this, this, this, this, and that just to get these food stamps. Wait, hold on. Just give me a job and we don't have to worry about this. You know, that's how I feel."

## Medicaid Work Requirements

At the time of our interviews, new Medicaid work requirements had been in effect for much of the preceding 12 months. In short, these rules required nondisabled, nonelderly people eligible for health coverage through the Affordable Care Act's Medicaid expansion to engage in and report at least 80 hours of work or "community engagement" per month for 10 months in the year or risk losing coverage for the rest of the year (Musumeci, Rudowitz, and Hall 2018). Information released by Arkansas DHS indicated that following implementation of Medicaid work requirements in 2018, over 18,000 beneficiaries ages 30 to 49 were disenrolled from the program in the last four months of 2018. In March 2019, after we completed our interviews, a federal judge suspended Arkansas's Medicaid work requirements.

When Medicaid work requirements were in effect, they created an additional layer of complexity for those already subject to the SNAP work requirement; though these people would have been exempt from Medicaid work requirements because of their SNAP involvement, several service providers voiced concern that many people wouldn't understand that and/or would fall through the cracks and lose coverage. About half of the SNAP participants we spoke with (20 people) reported receiving Medicaid.

Some focus group participants said they had never heard of Medicaid work requirements, and others thought they were the same as the SNAP requirements. Those aware of the Medicaid work requirement said they were confused about the details and had trouble figuring out how to comply and report that compliance to DHS. For Medicaid work requirements, people initially reported their hours through a DHS website; later, after widespread reports of problems with that website, the state allowed people to also report hours directly to DHS by phone or in person, or to designate someone to report work hours for them. However, SNAP participants said these reporting processes, especially the website, were confusing and left them feeling disheartened. A few focus group participants said they reported hours through the insurance company administering their Medicaid coverage.

A state DHS staff member acknowledged that implementing Medicaid work requirements (known as Arkansas Works) had been challenging:

“The main criticism for Arkansas Works was that we didn’t do more for letting folks know the work requirement was coming. We sent letters and did what was required, [but] I think about how many pieces of mail I don’t read. The world we live in—the text, app, or email option—it is a different world. On both sides, we could learn more about how to alert clients and caseworkers about how to abide by the policy.”

Among our focus group participants, people seemed more susceptible to losing Medicaid than SNAP. Some lost and regained Medicaid coverage on a monthly basis. One person said he lost his Medicaid coverage after a month with an extra Friday, meaning an extra paycheck pushed his income over the eligibility threshold. People said they were anxious about losing their insurance and access to a doctor. And because of communication issues, some people only learned that they had lost Medicaid coverage when they were in crisis. One focus group participant said he left the hospital emergency room before a cancer screening because he had been notified that he had lost his Medicaid coverage and would have to pay for the screening and treatment out of pocket: “They tell me...‘We’re sending the cancer doctor in, but you don’t have any Medicaid. They cancelled your Medicaid because you didn’t work’...So I got up and walked out [of] the hospital. Because if I’m going to die, my children aren’t going to pay for the rest of their lives for a medical condition that I could not help. If I got \$700,000 of medical bills and my children feel obligated to pay that because I’m their daddy, or doctors hound my children, I’m not going to have that. So I’m going to leave the hospital and die.” A companion report provides additional information on the implementation of Medicaid community engagement requirements in Arkansas (Hill and Burroughs 2019).

## SNAP Participants Have Limited Access to Jobs, Training, and Other Support Services

For work requirements in public assistance programs to promote sustained employment, states need a work support service infrastructure that helps people access higher-quality jobs. However, when SNAP participants in our focus groups discussed their experiences with work and training, they emphasized the challenges to accessing steady jobs with living wages and obtaining training to help them access better jobs. SNAP participants described their current and prior work experiences, and their responses on the profile form indicated about half were currently employed. The forms also revealed major differences in current employment across the study sites. Employment was most prevalent in Little Rock, where 17 of 24 participants were working, including 12 working 20 hours or more a week. In West Memphis, 2 of the 10 participants were working, both for less than 20 hours a week. None of the focus group participants in Fort Smith reported being employed, but many discussed prior work experience. We found similar patterns in participation in training programs across the three sites: in Little Rock, 14 of 24 participants reported current involvement in an employment or skills training program, compared with just 3 of the 10 people in West Memphis and 1 of the 7 people in Fort Smith. Some of these differences likely reflect variation in the work and training opportunities available across the locations, and some differences reflect the local recruiting methods for the focus groups. For example, the West Memphis focus group participants had only recently been referred to the SNAP E&T program, but those in Little Rock had ongoing relationships with the SNAP E&T provider.

As indicated above, Arkansas has a low statewide unemployment rate (3.4 percent in March 2019, slightly below the national average of 3.8 percent that month), but our conversations revealed that access to employment with livable wages and manageable work conditions remains limited for some in Arkansas's economy. Both SNAP participants and service providers said many areas of the state lack quality jobs, leaving residents with primarily low-wage, unstable work and sparse opportunities for mobility and advancement. The 2019 minimum wage in Arkansas is \$9.25.

Further, though SNAP E&T programs and workforce centers offer soft-skill training, SNAP focus group participants said these programs provide little access to advanced technical skill training to promote employment in high-demand industries. In addition to poor employment prospects, SNAP participants described notable barriers to work, education, and training, including unreliable public transportation throughout the state. Even jobs that may be available can be difficult to get to.

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*“We have a very limited bus system and a trolley. We have a real issue with transportation to get to and from work, especially [for a] night shift.”*

*—Service provider in Fort Smith*

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## **Jobs Are Available in Some Areas, but Most Pay Low Wages**

Many SNAP participants and service providers we talked to in Arkansas said jobs are available, but they are primarily low-paying, entry-level positions in hospitality, food service, agriculture, trucking, health care, and manufacturing, which is consistent with national analyses of the labor market SNAP participants face (Butcher and Schanzenbach 2018). People with commercial driver’s licenses can find job opportunities as truck drivers, and in eastern Arkansas, warehousing and forklift jobs are in demand. “It’s easy to get a job in two weeks...It’s mostly for pallet factories, chicken plants,” said a service provider in western Arkansas. “It’s minimum wage to \$11. They’re hard jobs but stable jobs.” However, other providers and participants noted these plants are typically outside city limits and not accessible through public transportation. Though overall funding for SNAP E&T was limited for certain certifications (e.g., certified nursing assistants) because of the length of training and high cost, less expensive certifications requiring less training for other jobs, such as forklift drivers, did not seem as limited. Many focus group participants were certified forklift operators, and they mentioned it required only a one-day training. However, the availability of those jobs can mask the difficulty in maintaining stable employment: low wages, difficult working conditions, and limited transportation can make it difficult to keep a job, even for those who have the requisite skills and licenses.

The SNAP participants and service providers we talked to see these jobs as a first step to better job opportunities as participants build a work history and develop their skills. Receiving SNAP helped people afford food and freed up resources for other basic needs, but many said they struggled to remain stable on entry-level wages. As one job seeker in Little Rock said:

“I only make \$300 a check when you incorporate my child support payment. And I haven’t even accounted for my lights, my gas, my water...I have the cheapest phone bill available. If you go to the store, and if you buy the cheapest, most disgusting stuff, you are still going to spend \$20 a day to eat, drink, live. And I still don’t have anything for my hair, toilet paper, a toothbrush. I don’t have a decent pair of shoes on my feet.”

In addition, many available jobs require great physical exertion or have inflexible or nontraditional schedules. Some SNAP participants in our focus groups mentioned having worked as mechanics, forklift

drivers, welders, and factory workers and in other physically demanding jobs. However, several focus group participants described or exhibited physical or mental health barriers that precluded this type of work, though those barriers had not been recognized by caseworkers or deemed severe enough to qualify for an exemption. Inflexible or nontraditional work schedules made accessing public transportation and scheduling appointments with DHS more challenging. One focus group participant said, “A lot of times, if you have a job that works on the weekends, the bus stops running at 6 on Saturday, 4 on Sunday. So, if you have to work nights, it’s tough.”

Further, weaker job markets, particularly in rural areas and smaller towns and cities, leave job seekers with even fewer options. “West Memphis to Marion don’t have jobs,” said one SNAP participant. “I mean, if you’re not getting warehouse or restaurant jobs, you aren’t really getting no decent jobs here. I mean, just being honest. We are a truck stop city. That is pretty much what dominates our economy.” A SNAP participant in Fort Smith shared a similar story: “It’s not always our fault...I’m college educated, and I have everything supposedly going for me but can’t seem to get a job in this town. The town is just slow on jobs right now.”

Many SNAP participants said they want meaningful, dignified work, so they find these conditions—and their inability to support themselves and their families—debilitating.

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*“Right now, [I’ll take] any job, just something to bring in some money...It makes me feel defeated sometimes, but at the same time, it makes you feel better that you can get out and try to do something. Hopefully, in the end, you will get something.”*

*—SNAP participant*

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## **Education and Training Opportunities Are Limited**

SNAP E&T providers and workforce centers can help job seekers navigate job placement options and training and education programs (box 2), but accessing these resources can be difficult given geographic, procedural, and financial constraints. Though participation in SNAP E&T and workforce programs is voluntary for Arkansans subject to ABAWD rules, it can help them comply with the SNAP work requirement and perhaps secure long-term employment. SNAP focus group participants said they use the workforce centers and SNAP E&T service providers for help conducting job searches and skill assessments, for referrals for direct placement with specific employers, and to obtain funding for

training. SNAP E&T participants have better access to soft-skill training, service providers said, but access to technical training is limited.

SNAP participants said they hope to gain additional education and training to secure better-quality employment. Nine SNAP participants in our focus groups reported having less than a high school education, 18 had graduated from high school or had a GED, 13 had some college education, and 2 had completed college.

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## BOX 2

### The SNAP E&T Program in Arkansas

One way to meet the work requirement is participating in the SNAP E&T program. The SNAP E&T program seeks to offer “any eligible SNAP recipient who wishes to volunteer in the program the opportunity to gain the knowledge and skills necessary to obtain and maintain employment,” according to the Arkansas SNAP E&T FY 2019 state plan. People subject to the ABAWD rules are the target population for the SNAP E&T program in Arkansas, though their participation in SNAP E&T is voluntary and other SNAP participants may also voluntarily participate. The SNAP E&T program contracts with adult education centers, public schools, vocational schools, community colleges, community-based organizations, and workforce service agencies to offer independent job search, job search training, occupational skills, English as a second language classes, work experience, on-the-job training, job retention skills, GED and basic skills education, vocational training, self-employment, apprenticeships, and internships. SNAP E&T participants may be reimbursed up to \$50 per month for expenses related to E&T program participation, such as transportation, uniforms, and tuition.

Though SNAP E&T programs are offered to people in all counties as of FY 2019, accessing these programs may not always be practical (figure 2). For example, some people are offered services only in a neighboring county and may receive an exemption if transportation is unavailable. In FY 2018, SNAP E&T programs in Arkansas reported 4,737 assessments and 436 job placements at an average hourly wage of \$8.89. Arkansas anticipated that 55,689 people in the state would meet the ABAWD criteria and be subject to the requirement to work in FY 2019. Based on historical data, they estimated spending approximately \$150 per month per ABAWD to ensure qualifying work activities are offered in full-service counties.

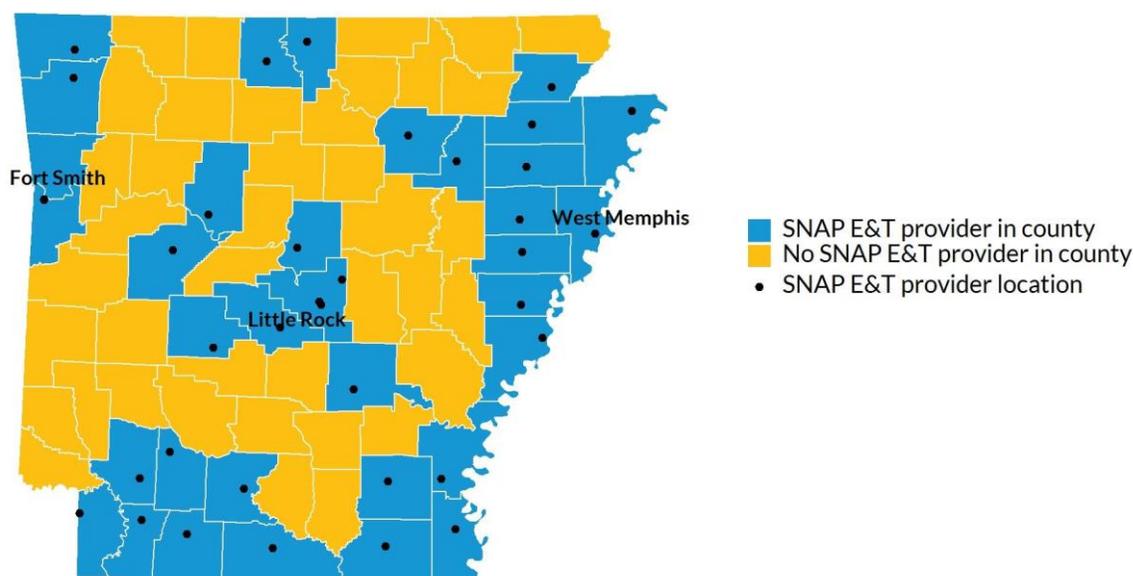
Source: Arkansas SNAP E&T FY 2019 state plan.

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**NOT EVERY COUNTY HAS A SNAP E&T LOCATION OR COMPREHENSIVE WORKFORCE CENTER**  
DHS refers people not complying with ABAWD rules to SNAP E&T providers for help finding training, securing employment, and reporting their hours to DHS, but there may not be a SNAP E&T provider in

participants' counties. Figure 2 shows that many Arkansas counties have no SNAP E&T provider, and most have only one provider serving the whole county. In addition, the Arkansas Division of Workforce Services website lists 33 locations serving the state's 75 counties.<sup>10</sup> Consequently, people may need to travel long distances to access in-person services, which may not be practical given limited transportation options. We held our focus groups in areas that had both SNAP E&T providers and workforce centers, so participants may have had more access to services than people in other areas of the state.

**FIGURE 2**  
**SNAP E&T Provider Locations in Arkansas**



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**Source:** "SNAP E&T Coordinators," Arkansas Department of Human Services, accessed May 17, 2019, <https://humanservices.arkansas.gov/images/uploads/dco/SNAPETCoordinators.pdf>.

**Note:** E&T = employment and training.

### NOT ALL SNAP PARTICIPANTS CAN ACCESS EDUCATION AND TRAINING

Administrative challenges and insufficient funding limit SNAP participants' access to education and training in high-demand, high-wage fields. Though some workforce center staff mentioned a growing network of employer partners and education and training options, most agreed that, currently, SNAP participants often can only access soft-skill training.

In discussing how well established and widespread education and training is for high-demand, high-wage fields, the people we interviewed seemed to agree that Arkansas is trying to develop these trainings, but the capacity is not yet strong. Workforce center staff members and some service providers discussed a network of partners in industry, education, and social services that provide hard-skill training for in-demand industries, such as nursing, forklift and warehousing, culinary arts, truck driving, and manufacturing. A workforce center staff member said many job seekers need to establish a work history or find work for the first time, so staff members connect them with apprenticeships and work experience programs. The staff member also said the workforce center can help people find programs through local community and four-year colleges, including regional campuses of the University of Arkansas, and adult education providers. One adult education provider noted they seek guidance from employer partners to inform their approaches to workforce education and services and, therefore, have added apprenticeship programs in residential construction and electrical work based on predicted growth in those areas. At least one service provider was optimistic that current efforts to enhance the workforce development infrastructure would improve access to higher-paying jobs and careers, saying, “I’m seeing more interest and energy than ever before...There’s a stronger workforce board. As far as the pipeline goes, we started last year with preapprenticeship programs, we’re doing a CNA [certified nursing assistant] one now. Very early stages of all of these and trying to figure out where the need is. We’re working with hospitals and nursing homes. We’re in the early stages, [but there’s] lots of growth.”

Demand for education and training, though, exceeds available funds. Funding for education and training comes primarily from the Workforce Innovation and Opportunity Act, Temporary Assistance for Needy Families, and SNAP E&T programs, which service providers said runs out before the end of the year. According to the SNAP E&T FY 2019 state plan, the Arkansas FY 2019 SNAP E&T operating budget included \$2,229,516 in state funds and \$3,804,359 in federal funds. In FY 2018, national federal expenditures on the SNAP E&T program totaled \$441 million, less than 1 percent of the \$6.8 billion in total federal SNAP expenditures that year (OMB 2019). In FY 2018, national federal expenditures on adult employment and training activities under the Workforce Innovation and Opportunity Act totaled an additional \$843 million (OMB 2019).

Administrative challenges also limit access to education and training, according to SNAP focus group participants and the service providers we spoke with. “DHS will pay for it as long as [beneficiaries] are in compliance,” one service provider said, but approval is not automatic. “With DHS, it’s like a scholarship. I have to make a case for [my clients] to receive it.” Service providers said the eligibility criteria for SNAP E&T funding is unrealistic. “From my perspective, trying to figure out who will be

funded or not, it seems you need to be stable enough to have your child care and your transportation...figured out but also not so stable that they think that you can just do this on your own," one SNAP E&T provider said, speaking broadly about access. "I don't know who of my clients fill this very specific range of needy."

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*"I have plenty of people who are fully participating and who want to be in training right now in order to start their careers in some capacity, but it is about getting everything in place in order to do it and just how difficult it is to get a funding request together, just how many things you have to have to get together."*

*—Service provider at a workforce center*

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Further, the time needed to prepare a funding request and long wait times for approval can delay enrollment in education and training. According to DHS documents, funding requests must be submitted at least 30 days before a training program begins. "The bottleneck for training is just difficult," a service provider said. These delays have potentially serious consequences if people use their three months of benefits waiting for a qualifying activity placement and end up losing both their SNAP benefits and their eligibility for SNAP E&T funding.

Because of the challenges accessing education and training, SNAP E&T and workforce programs primarily provide soft-skill training and basic work readiness support to help participants prepare résumés, do mock interviews, and learn about professionalism, including appropriate work attire. For people needing to engage in countable activities to comply with the SNAP ABAWD rules, the practical options may be limited. Consequently, the hours people spend in activities to comply with the requirement to work may not help them get jobs or advance toward higher-paying careers. One SNAP participant said she had sought to update her computer skills but was told she would need to pay for that training herself, so she sat through a basic skills training covering topics she already knew: "I go to adult education and they put me in this class where I sit in front of a computer and learn how to write checks and balance a checkbook and other stuff I've been doing for years." Noting differences in approaches across counties, she said that in another county where she lived, people could take computer classes and earn a GED, but where she lives now, "you take what they tell you to take."

## Structural Barriers Affect Access to Work, Education, and Training

SNAP participants and service providers to whom we talked described multiple challenges and structural barriers that can obstruct job and training opportunities. A criminal record bars some job seekers from high-demand industries and higher-wage positions. Unaddressed mental and physical ailments and lack of affordable health services also impede efforts to maintain employment. One-third of SNAP participants in our focus groups reported fair to poor health.

Lack of transportation was another major work barrier. “The chicken factory is a mile away, and if you work the second shift, you have to walk because the bus stops working at 6 p.m.,” one service provider said. In Fort Smith and Little Rock, public transportation was limited to a narrow window in the middle of the day. In West Memphis, the bus line had been discontinued a few months earlier, leaving no public transportation.

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*“The public transportation system in Little Rock is just outstandingly dismal. You just can’t get anywhere.”*

*—Service provider*

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“Hours are super limited,” a SNAP E&T provider in Little Rock said of the public transportation system. “If you are trying to get anywhere on the weekends, forget about it. Especially if you need to be working until 8 or 9 at night, you won’t be able to get back from places further out. The [buses] downtown run pretty regularly, but none of my folks, unless they are working at a restaurant downtown or the Walgreens on the corner [can take those buses to work]. That’s not where the jobs are.”

Finally, some locations in rural Arkansas lack the infrastructure to provide robust adult education and varied pathways to employment. People may have to travel far to work or access training opportunities. “There are very few employers in [Monroe] County. Very few resources. No education facilities,” said a workforce provider from a neighboring county. “A lot of times, if you’re doing training, you have to go into another county.”

## Support Services Help Some Workers Address Barriers to Work, Education, and Training

Social service providers, such as homeless shelters, financial counseling services, and food banks, can help SNAP participants reduce some barriers to work, education, and training. They play a vital role as liaisons, helping participants navigate different government agencies, educational institutions, and employment opportunities. Such organizations also can help people get the wraparound support they need to continue complying with the SNAP work requirement.

SNAP E&T and other workforce development programs can also help program participants access additional supports, such as work clothes, transportation assistance, reimbursements for work gear, and help with application fees (e.g., drug screening fees). But many SNAP participants and service providers said people had trouble accessing these supports in a timely manner, or strict rules prevented them from using the supports effectively. In West Memphis, people expressed frustration that the transportation reimbursement could only be used for trips within Crittenden County and not over the state line to Memphis, Tennessee, where jobs are more abundant. The SNAP E&T provider in Little Rock said it takes so long to get approval for work-gear funding that people sometimes miss out on the job opportunity: “By that time, the interview opportunity that they needed the welding mask for could be long gone and they already hired somebody else.”

## Some People Lose Access to SNAP

The administrative challenges and structural barriers to complying with the work requirement have caused some participants to lose access to SNAP, though they often regain access within a few months, a process known as “churn.” Many SNAP participants in our focus groups said they do not know why they lost access, but churn often occurs because of administrative issues, such as missing paperwork (Mills et al. 2014). People can also lose SNAP if their incomes rise above the eligibility threshold or other circumstances change, such as their household composition. The focus groups and interviews made clear how important SNAP is to participants on tight budgets—and how disruptive it can be when these benefits suddenly end. In addition to causing hardship for participants who lose SNAP benefits, closing and reopening a SNAP case costs time and money for both SNAP participants and states (Mills et al. 2014).

## Why Participants Have Lost SNAP Benefits

SNAP participants in our focus groups said they were often unsure about the status of their benefits or, if they had already lost benefits, why they had lost access. Losses may have resulted from bureaucratic challenges, lack of ability or opportunity to comply with the 80-hour requirement to work, or changes in income or other eligibility conditions.

SNAP participants can lose SNAP benefits because of bureaucratic challenges that often begin with people not receiving timely notification that they must comply with the work requirement, as discussed earlier. Participants' confusion about the administrative processes for reporting their work can lead some to lose benefits or face other hardship. One SNAP participant said he got a job and was making enough money that he believed he should have no longer qualified for SNAP, but he continued receiving benefits. Because he believed his employer was reporting his work hours, and therefore he was complying with SNAP rules, he did not notify SNAP about his new job. However, when he contacted DHS to clarify the situation, they required him to pay back the benefits they had given him. For a person already living on a tight budget, this sudden expense made it difficult for him to afford basic necessities. SNAP participants face additional challenges and potential hardship when DHS makes administrative mistakes or their reporting mechanisms fail to accurately capture participants' employment. For example, a SNAP E&T provider attempting to update a client's information through the DHS portal discovered the client was no longer in the system: "The answer I get back from DHS is she was mistakenly cutoff," she said. "Now, because of that mistake, she just won't have benefits for a period of time that is unknown...The burden for making up for [DHS's] mistake is not on DHS, it's on the beneficiary." Though DHS may pay retroactive benefits in some cases, clients must get by without those funds in the meantime.

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*"And everything I do to go through DHS or whatever, I hit a brick wall. It's almost like they set you up for failure because you can't meet all of these requirements."*

*—SNAP participant*

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Additionally, many SNAP participants we spoke to had inflexible work and training schedules that made it difficult to call or visit a DHS office to get more information, report their hours, or get recertified

for benefits. Transportation barriers further exacerbated this challenge. And as discussed earlier, SNAP participants said scheduling phone appointments with caseworkers was often not a reliable option.

People subject to the work requirement also may lose benefits because they lack quality employment and technical training opportunities. As described above, access to these opportunities is limited, especially in more rural areas with less diverse economies and limited public transportation. When people find work, it is often a low-wage job with little room for advancement and no path toward a sustainable career. The most common occupations in the three sites include office and administrative support, sales, food preparation and serving, and transportation and material moving.<sup>11</sup> In Little Rock, the median hourly wage for office and administrative support employees, the most common occupation, is just \$15.65 per hour. This rate falls short of the hourly rate needed to afford a two-bedroom apartment in Pulaski County.<sup>12</sup>

More broadly, SNAP participants and service providers also expressed concerns about a “cliff effect” or “benefit cliff,” where people earn just enough money to lose eligibility for benefit programs but not enough to get by without those benefits. One SNAP participant noted the helplessness that many participants feel cycling through the current system. “They almost set you up for failure,” a SNAP participant said. “I feel very defeated right now with the whole process.” Many people rely on SNAP and other safety net programs to remain stable as they transition to better opportunities and establish next steps for their lives. The support they receive may be their primary means for affording housing, food, or transportation. A service provider said her clients lose their eligibility for benefits if they work more than 30 hours a week at minimum wage, so taking a full-time job is not always a good trade-off, at least in the short term.

Forty-two states and territories have reduced the cliff effect by making people eligible for SNAP if they receive or are eligible for another noncash benefit or service offered by the state (called broad-based categorical eligibility), but Arkansas is not among them. Arkansas maintains the gross income limit for SNAP eligibility at 130 percent of the federal poverty level, but states using broad-based categorical eligibility can raise the gross income limit up to 200 percent of the federal poverty level. This flexibility can accommodate households that have slightly higher earnings but still face significant expenses, like excess housing costs, that bring their incomes below the federal poverty level. Broad-based categorical eligibility also allows states to waive asset tests, which can help SNAP participants build savings to weather unexpected expenses (Waxman 2019; Waxman and Joo 2019).

## Losing SNAP Disrupts People’s Lives

Because people rely on SNAP to buy food, any change in their benefits can disrupt their already tight budgets, often forcing them to choose between basic necessities. One SNAP participant described the impact of losing her SNAP benefits, saying, “It’s like, move out of my house or help my health. You have to make those decisions.” A SNAP E&T provider offered a similar description of the difficult choices people face when they unexpectedly lose SNAP benefits:

“Knowing that you will be able to afford food frees up resources to be able to get where you need to be. The families that I work with, everyone is cutting it extremely close. So, the choices that you are faced with [are]: Am I going to need to put gas in my car to go to the doctor, or am I going to need this in order to make sure my family has dinner? It is as real as that. It is as simple and direct and immediate. My families are planning their livelihood around SNAP. So, when it is cut off because there is a mistake or they did not turn in a pay stub...even if they were given plenty of time to do it—in DHS’s mind plenty of time—then the immediate consequence is something has to give. Something...that is essential in their lives.”

Nearly all SNAP participants in our focus groups (36 of 42) said they often or sometimes experienced food insecurity over the past 12 months. During our interviews and focus groups, we learned that people valued their SNAP benefits for helping them buy food, despite the challenges and barriers they also identified. One SNAP participant said, “With all the negative things I said, I do appreciate any help I get.” People were generally grateful for the benefits and saw them as an opportunity for some stability while working through a tough time.

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*“This ain’t something that I want for the rest of my life. It’s just something that I need to just bridge me through the gap until I’m stable.”*

*—SNAP participant*

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The effects of losing SNAP benefits can ripple beyond the individual participant. Though people subject to the SNAP work requirement do not officially have dependents, during our focus groups we heard that some people were supporting children not in their custody. Six of the people we talked with across Arkansas discussed taking care of children, including two who specifically discussed paying child support. A woman in Fort Smith explained that because she was homeless, her four children lived with her mother. Her partner, who also participated in the focus group, felt responsible for caring for them as well. “They’re my children, too,” he said. “Because I took them on. I’m going to be their daddy.” He

wanted to be sure the children weren't singled out at school for lacking shoes or school supplies, so he provided whatever he could. "What money we do get, it goes to the children 90 percent of the time," he said. A father in West Memphis didn't specify his custody arrangement but mentioned his responsibility for children when discussing the slow pace of service at the DHS office. "They don't care that I got other things I got to do," he said. "Got to pick up the kids, go to the grocery store, put gas in the tank. You know, stuff needs to be done." Finally, a woman in Little Rock without children of her own described demands on her time from friends and family. "They all of a sudden need you to help them," she said, "Or, you know, their kid all of a sudden gets sick or whatever." Thus, the consequences of lost benefits can trickle down to children and other family members.

## Potential Strategies for Improvement

Our conversations with service providers and focus group participants suggest policy and bureaucratic changes would benefit program participants. Though the conversations centered on the implementation of SNAP work requirements, SNAP participants and service providers identified several broader ideas for improving support to people with low incomes, including creating policies that empower people to find stable employment and increasing access to better-quality jobs and training programs. Though many of these suggestions arose during focus group discussions about participants' experiences with the SNAP work requirements, we also specifically asked participants what changes they would make if they had a "magic wand." Their suggestions include

- streamlining bureaucratic processes and improving communication,
- enhancing access to jobs and training,
- improving transportation options,
- reconsidering work requirements when work is not available, and
- strengthening the safety net.

### Streamlining Bureaucratic Processes and Improving Communication

To improve the implementation of SNAP work requirements, service providers and focus group participants indicated the need for DHS to provide more streamlined and consistent reporting processes and communication systems. The SNAP participants and service providers we talked with both indicated frustration and confusion when attempting to get information on the requirements and applying for SNAP. They suggested more coordination between DHS offices and local service providers

who work directly with SNAP clients. One service provider said it would be helpful for DHS to train providers on SNAP policies and processes and to inform providers of changes, such as restarting the three-year clock.

## Improving Access to Jobs and Training

As indicated above, some SNAP participants and service providers we interviewed agreed that people should work if they can but said a requirement to work could not be successful in Arkansas without a robust training system and improved job opportunities. SNAP participants and some service providers argued that if work is going to be required for receiving SNAP benefits, SNAP participants need adequate opportunities to qualify for training programs and work support, and they need help overcoming structural barriers to accessing quality jobs. This includes expanding meaningful access to SNAP E&T providers and workforce centers in areas of the state where such resources are lacking, as well as expanding the offerings within existing locations.

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*“Just give me a job and we don’t have to worry about this.”*

*—SNAP participant*

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“I think anybody who qualifies for SNAP should be able to get into a workforce training program,” a service provider said. “I think if that was opened up and people weren’t spending all their time assessing and analyzing and seeing who was the most worthy or ready. Those are things that benefit us. These [certified nursing assistant] jobs, these forklift jobs are super in demand. People are asking for them, to send them trained people that are getting lost in months of logging and checking and seeing.” A SNAP E&T provider also suggested expanding education programs for in-demand fields, saying, “You’re seeing the bottleneck at the education level too. Some classes only allow for a certain number of students. You’re seeing some growth offering other programs. There are a lot of jobs—we’re not producing enough people to go into that field. It could be that there’s not enough education to get there.”

SNAP focus group participants said Arkansas also needs better-quality jobs to ensure that even those starting out with entry-level work have employer supports to enable long-lasting careers. One SNAP focus group participant suggested improving access to jobs by having DHS actively coordinate

with a staffing agency, which would help people looking for work access available positions and help employers looking for workers too.

## **Improving Transportation Options**

Improving access to jobs and training, SNAP focus group participants said, also requires improving transportation options. A SNAP participant said, “I think, just as far as government assistance, having a transportation program...or a route to make sure people don’t miss meetings. They do it for the senior citizens, and I don’t expect someone that’s disabled to get here to always use transportation. If you are not able to get transportation to meet your appointments, then that’s a problem.” A service provider highlighted another county’s successful partnership with local businesses to provide 24/7 point-to-point transportation.

## **Reconsidering Work Requirements When Work Is Not Available**

Overall, many service providers and SNAP participants with whom we talked supported the concept of a work requirement but were critical of the reinstatement of the ABAWD work-related time limit. They said the requirements should have been implemented more efficiently and transparently. “I don't think that the work requirements should be looked upon as negative,” a service provider said. “It should be positive, but how do you do that? It's the way you market it, and we did not do that.” Though some service providers supported the concept of work requirements, they wanted those requirements to empower SNAP participants, rather than penalize them if work is not available. “With SNAP, what I would want to see is have criteria for [people ages] 18 to 49, but I don’t think I would totally cut people off in three months with no food,” a service provider said. “I would put standards in place, but I would make sure people were able to work. For people that need to work, want to work, that we’d have enough money to help them.”

## **Strengthening the Safety Net**

Beyond suggestions related to work requirements, service providers and focus group participants had ideas for fundamentally strengthening the safety net more broadly, including strengthening coordination across programs, increasing benefit amounts, addressing the benefit cliff, and improving access to physical and mental health services.

## STRENGTHEN COORDINATION ACROSS PROGRAMS

To better support low-income adults, service providers and focus group participants indicated that it would be important for the state to address inefficiencies and fragmentation across support programs. “I wish agencies worked together,” said a service provider. “We have an income limit for different agencies and there’s nothing standard across the board. If it’s \$13 an hour at full time to be self-sufficient, then let that be the rule for all programs.” SNAP participants in our focus groups also suggested a more cohesive safety net that would screen for all programs at once. One respondent said, “Why don’t you screen for all these things at the same time? So people don’t have to chase around benefits and sit in DHS offices for this and then the next day for this and then the next day for this.”

## INCREASE BENEFIT AMOUNTS TO MEET FOOD NEEDS

In addition to improving the administrative aspects of SNAP implementation, service providers and SNAP participants recommended changing SNAP policies to reflect the needs of those who apply. SNAP focus group participants expressed frustration that SNAP benefits do not support the cost of living in Arkansas and do not account for wages garnished for child support or legal fees. The maximum SNAP benefit does not cover the full cost of a low-income meal in any county in Arkansas.<sup>13</sup> A SNAP participant said DHS should “find out your circumstances and treat you according to that. Not just, ‘okay you’re making \$9.25 an hour.’ That’s nothing. \$9.25 an hour. Just be more realistic about SNAP, the assistance you are giving, rather than saying that we are giving you something. I am a grateful person, but [my SNAP benefit is] \$16 a month.”

## ADDRESS THE BENEFIT CLIFF TO FURTHER REWARD WORK

Several service providers and SNAP participants with whom we talked wanted the safety net to address the cliff effect by more gradually phasing out benefits. SNAP participants expressed frustration that people working a full-time, minimum wage job did not make enough to meet their food needs yet could not qualify for SNAP. They said the current system creates a disincentive to work more hours because it can push people off SNAP before they can save up enough money to have a solid financial footing.

## IMPROVE ACCESS TO PHYSICAL AND MENTAL HEALTH SERVICES

Service providers and SNAP participants noted that to find stable employment, people also need improved access to physical and mental health services, in part through expanded access to health insurance. A service provider said, “We want as many people on health insurance as possible. There’s still a huge issue of people with insurance who aren’t compliant with their medications. Arkansas is one of the worst states for diabetes. Those kinds of chronic diseases are very hard for people to manage

even with insurance.” Service providers also noted that without access to mental health care, they are limited in what they can do to help people find stable employment. A service provider said, “It really limits us as far as what we can help, because there’s not a lot of mental health–type support systems in this area...They could be employable with the right help.”

## Conclusion

Understanding how program participants and service providers experience current work requirements can inform other states considering expanding work requirements in SNAP, Medicaid, and other safety net programs. Our focus groups with SNAP participants and interviews with service providers revealed some frustration with DHS communication and confusion about how to document compliance with work requirements. Further, this study highlights challenges people face accessing available jobs, including poor health and lack of transportation. According to the people we interviewed, the jobs available to SNAP participants tend to be unstable and pay low wages, and limited resources restrict access to the education and training needed to qualify for higher-paying jobs and careers. SNAP E&T and workforce center funding for training and other work supports do not meet demand, and bureaucratic rules and processes further restrict access. In practice, the education and training opportunities available to people subject to the ABAWD requirement to work are often limited to soft-skill training and basic work readiness supports. Though these services are vital to some participants, they are not what many people need to get jobs or advance toward higher-paying careers. These findings suggest significantly expanding resources would be necessary to meet increased demand if Arkansas moves forward with proposed legislation to mandate SNAP E&T participation for SNAP participants not complying with the general work requirement.

SNAP participants and service providers suggested several potential strategies, including clearer DHS communication, better access to education and training opportunities, improved transportation infrastructure, and, more broadly, a stronger safety net. Nonetheless, the limited availability of high-quality jobs could pose a formidable obstacle even if the other strategies were implemented. Many SNAP participants and service providers agreed that people should work if they can but questioned the value of the requirement to work in light of real-life experiences that complicate compliance and can lead to people losing access to vital nutrition assistance.

# Notes

- <sup>1</sup> In 2017, approximately 28 counties in Arkansas could have secured ABAWD waivers; see “Part III: Hunger and ABAWDs Waivers,” Arkansas Advocates for Children and Families, accessed September 30, 2019, <https://www.aradvocates.org/part-iii-child-hunger-and-abawds-waivers/>.
- <sup>2</sup> Act to Establish the Employment Opportunities for Able-Bodied Adults Act of 2019, H.B. 1775, 92nd Leg., Reg. Sess. (Ak. 2019); Marine Glisovic, “Changes Coming to Arkansas Food Stamps Program,” ABC 7, April 11, 2019, <https://katv.com/news/local/changes-coming-to-arkansas-food-stamp-program>.
- <sup>3</sup> We followed informed consent procedures approved by Urban’s Institutional Review Board for all interviews and focus groups.
- <sup>4</sup> “State Unemployment by Race and Ethnicity,” Economic Policy Institute, updated May 2019, <https://www.epi.org/indicators/state-unemployment-by-race-and-ethnicity/>.
- <sup>5</sup> “Unemployment Rate by Educational Attainment and Age, Monthly, Not Seasonally Adjusted: 25 Years and Over,” Federal Reserve Bank of St. Louis, accessed September 23, 2019, <https://fred.stlouisfed.org/release/tables?rid=50&eid=48713>.
- <sup>6</sup> “Literacy Needs in Arkansas,” Adult Learning Alliance of Arkansas, accessed September 11, 2019, <https://www.arkansasliteracy.org/who-we-are/literacy-needs-arkansas>; “Internet Access in Arkansas,” BroadBandNow, accessed September 11, 2019, <https://broadbandnow.com/Arkansas>. To be underserved by internet coverage, you must have access to fewer than two wired providers.
- <sup>7</sup> “Percent of Households with a Broadband Internet Subscription,” US Census Bureau, accessed September 23, 2019, [https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS\\_17\\_1YR\\_GCT2801.US01PR&prodType=table](https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_17_1YR_GCT2801.US01PR&prodType=table).
- <sup>8</sup> Arkansas DHS shared this document with the Urban Institute research team; it is not publicly available.
- <sup>9</sup> Arkansas DHS shared this document with the Urban Institute research team; it is not publicly available.
- <sup>10</sup> See the Arkansas Division of Workforce Services’ contact page at <https://www.dws.arkansas.gov/contact/>.
- <sup>11</sup> “May 2018 Metropolitan and Nonmetropolitan Area Occupational Employment and Wage Estimates: Fort Smith, AR-OK,” Bureau of Labor Statistics, March 29, 2019, [https://www.bls.gov/oes/current/oes\\_22900.htm](https://www.bls.gov/oes/current/oes_22900.htm); “May 2018 Metropolitan and Nonmetropolitan Area Occupational Employment and Wage Estimates: Memphis, TN-MS-AR,” Bureau of Labor Statistics, March 29, 2019, [https://www.bls.gov/oes/current/oes\\_32820.htm](https://www.bls.gov/oes/current/oes_32820.htm).
- <sup>12</sup> “Out of Reach 2019: Arkansas,” National Low Income Housing Coalition, accessed September 23, 2019, <https://reports.nlihc.org/oor/arkansas>.
- <sup>13</sup> “Does SNAP Cover the Cost of a Meal in Your County?” Urban Institute, accessed September 23, 2019, <https://www.urban.org/does-snap-cover-cost-meal-your-county>.

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