

RESEARCH REPORT

# Work Requirements in Social Safety Net Programs

**A Status Report of Work Requirements in TANF, SNAP, Housing Assistance, and Medicaid**

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This work is part of the Urban Institute’s 50-year history of forecasting and analyzing major shifts in federal policies, including remaking the safety net. As policymakers consider profound changes in the safety net, our researchers remain committed to producing important evidence-based resources for policymakers and the American public to understand the implications of changing federal policy.

# Work Requirements in Social Safety Net Programs

Federal cash assistance, nutrition assistance, and some housing assistance agencies currently include work-related requirements of some kind (such as that the recipient be engaged in a job search, job training, or employment and community engagement activities) as a condition of program eligibility (Falk, McCarty, and Aussenberg 2014). Work requirements across Temporary Assistance for Needy Families (or TANF, which is cash assistance), the Supplemental Nutrition Assistance Program (or SNAP, formerly known as food stamps) and some housing assistance agencies (select Moving to Work programs) vary widely in what exactly is required and what types of program participants are subject to the requirements.

Historically, four main rationales have underpinned work requirements in safety net programs (Falk, McCarty, and Aussenberg 2014). First, work requirements are seen as a means of offsetting the potential work disincentives associated with participating in programs that are available only to families with low incomes (Moffitt 1992). Second, some argue that work requirements promote a culture of work to protect against any shift to reliance on government support (Falk, McCarty, and Aussenberg 2014). Third, work requirements are seen by some as a means of ensuring that participants demonstrate that they are deserving of assistance funded with scarce federal tax dollars. Finally, despite mixed evidence, work requirements are rationalized as a means to alleviate poverty through income from work.<sup>1</sup> These rationales behind work requirements are built upon assumptions that employment opportunities are available and that some of the people served by these programs may be choosing to receive assistance instead of working.

Limited information is available about how the work requirements in SNAP and housing agencies have been implemented or their success at achieving stated goals. More information is available about TANF work requirements than about work requirements in SNAP and housing assistance. Research on the effectiveness of TANF work requirements found modest employment increases that decreased with time and did not increase stable employment in most cases (Schott and Pavetti 2013). TANF recipients who found employment continued to have incomes below 100 percent of the federal poverty level, or FPL (Hamilton et al. 2001). However, much of the evidence is from the early 2000s, and it is not clear whether the current economy would produce the same results. Many SNAP and housing assistance participants are already working or exempt from work requirements (Carlson, Rosenbaum, and Keith-Jennings 2016; Center on Budget and Policy Priorities 2016; Fischer 2016). SNAP research also shows

that although incomes rise when work requirements are implemented, they remain below 100 percent of FPL (Carlson, Rosenbaum, and Keith-Jennings 2016; Lee 2016).<sup>2</sup> The information available on the limited implementation of work requirements in housing assistance programs is insufficient to determine the effects on employment and incomes.

For the first time in the Medicaid program's 50-year history, work requirements are being seriously contemplated for the program. The Center for Medicare & Medicaid Services (CMS) signaled its openness to considering work requirements as a condition of Medicaid eligibility in a letter to governors in March 2017.<sup>3</sup> Since that time, eight states have submitted waiver requests to CMS that include work requirements, and the CMS administrator recently indicated that the agency plans to "approve proposals that promote community engagement activities," such as "working, volunteering, going to school or obtaining job training."<sup>4</sup> Notwithstanding the stated objectives, observers across the political spectrum have raised concerns that including such requirements as a condition of Medicaid eligibility could make it harder for people to address physical, mental, and behavioral health problems that affect their ability to obtain and retain employment, and that such requirements could be difficult to enforce (Katch 2016; Rector 2017).<sup>5</sup>

Further, the Food and Nutrition Service of the US Department of Agriculture sent a letter to states on November 30, 2017, signaling openness to considering expansions of the existing work requirements in SNAP. The letter states that "people who can work, should work. We must facilitate the transition for individuals and families to become independent, specifically by partnering with key stakeholders in the workforce development community and holding our recipients accountable for personal responsibility."<sup>6</sup>

In this report, we present information on the work requirements currently in use in TANF, SNAP, and some federal housing assistance programs and discuss the available evidence on implementation experiences and impacts. We also describe Medicaid waiver requests currently under consideration at CMS that would include work requirements. We close by highlighting key questions for consideration when assessing the use of work requirements in safety net programs. For example, given the evidence that employment among families who are subject to current work requirements rarely pays high enough wages to move a family off assistance and out of poverty, what are the expected benefits of implementing new work requirements?

# Work Requirements in TANF, SNAP, and Federal Housing Assistance Programs

Although work requirements vary widely across programs, each program must grapple with common issues in developing work requirements, including the following:

- **Who is subject to work requirements?** Are all program participants subject to work requirements or only those who, for example, are offered work or training opportunities or who are determined to be “able bodied,” and how is ability defined or determined? A related consideration is whether the responsibility of fulfilling work requirements falls solely to program participants or if program administrators are accountable for engaging participants in work or work activities.
- **Who is exempt from work requirements?** Programs may decide to exempt categories of participants who otherwise would be subject to them, such as adults caring for young children or ill or incapacitated family members. Programs may set limits on the total number or share of participants who can be exempt.
- **What satisfies the work requirement?** Do program participants need to be employed to meet the work requirement, or can they be looking for work or engaged in other work-related activities? Do education and training activities satisfy the work requirement? Can community service activities satisfy the work requirement? Must participants meet a minimum number of hours of work activity each week or month? How do participants demonstrate or document that they are meeting the work requirement? Are programs required to offer participants work or work activities if they are unable to find jobs on their own? Are exceptions made during times of high unemployment or for other extenuating circumstances?
- **What are the consequences of not meeting the work requirement?** Do program participants lose their eligibility for assistance if they do not comply with the work requirement? If program administrators are held accountable for participants’ engagement in work activities, what are the consequences for the program if those requirements are not met?
- **Do work requirements vary across states or local agencies?** To what extent are work requirements uniform throughout the program, and how much can individual states or program sites shape them?

TABLE 1

## Summary of Work Requirements in TANF, SNAP, and Housing Assistance Programs as of December 2017

Program	For whom?	Exemptions	What is required?	Consequences	State variation?
TANF	For families receiving TANF cash assistance, federal law requires states to engage at least 50 percent of all families with a work-eligible individual and 90 percent of two-parent families with two work-eligible individuals.	Yes, but varies by state. Federally recognized exemptions include single parent with a child under 12 months old, parents caring for disabled family member, and recipients sanctioned in certain situations. States may choose to exempt other individuals or groups from work activities, but the exemption does not remove the individuals from the calculation of the state's federal work participation rate.	Specific work-related activities (e.g., unsubsidized or subsidized employment; job search and readiness; job skills training) for a minimum number of hours per week	States face federal financial penalties for not meeting work participation rate. States establish consequences for TANF, ranging from warnings to termination of benefits.	Yes, state rules for cash assistance recipients vary in activities available, timing, and exemptions.
SNAP	One work requirement for able-bodied adults ages 16 to 59 One work requirement for ABAWDs ages 18 to 49	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.  ABAWDs are exempt if they are under age of 18, over age 49, pregnant, disabled, caring for a child or disabled family member, or already exempt from general SNAP work requirements.	Federal rules require that able-bodied adult recipients register to work, accept a job if offered, and not quit a job without good cause.  ABAWDs must work 20 hours a week in order to receive SNAP for more than three months within three years	States determine consequences within federal maximum limits. Consequences become more severe with repeated violations and range from temporary reductions in benefits to permanent disqualification for violating household member or temporary termination of household's full benefit.	Yes, some states have statewide of partial ABAWD waivers, states also vary if they offer employment and training and if it is mandatory or voluntary
Housing	Some public housing tenants and housing choice voucher participants in select Moving to Work demonstration public housing authorities	Depends on public housing authority. All public housing authorities exempt elderly, disabled and those physically or mentally unable to engage in work activities.	Depends on public housing authority. Some require wage employment, others require work-related activities. Hours required range from 15 to 37.5 hours a week.	Depends on public housing authority. In some, noncompliant tenants can be evicted from public housing and have their housing assistance terminated.	Yes, public housing authorities involved in the Moving to Work demonstration can set work requirements.

Sources: Falk, McCarty, and Aussenberg (2014).

Notes: ABAWD = able-bodied adult without dependents; SNAP = the Supplemental Nutrition Assistance Program; TANF = Temporary Assistance for Needy Families. For more information on TANF, see the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, Pub. L. No. 104-193, 110 Stat. 2105; Falk, McCarty, and Aussenberg (2014); GAO (2017); and Cohen et al. (2016). For more information on SNAP, see Falk, McCarty, and Aussenberg (2014); GAO (2017), and "Able-Bodied Adults without Dependents (ABAWDs)," Food and Nutrition Service, last published October 25, 2017, accessed December 19, 2017. For more information on housing assistance, see Falk, McCarty, and Aussenberg (2014) and Webb, Frescoln, and Rohe (2015).

Table 1 summarizes the work requirements in TANF, SNAP, and federal housing assistance programs as of 2017, including the populations that are subject to work requirements, which populations are exempt, what qualifies as work or a work-related activity, and the extent of variation across states. The remainder of this section provides a high-level overview of each program's work requirements, such as the number of hours of work that are required, the consequences associated with not meeting work requirements, and further details on the variation across states.

## Work Requirements in TANF

Temporary Assistance for Needy Families<sup>7</sup> provides time-limited cash assistance and other services to low-income families with children, primarily families headed by single mothers. Within federal guidelines, states have broad flexibility to define eligibility and program rules, although nearly all states serve only families with incomes below 100 percent of FPL. To be eligible to receive TANF, applicant families may have earnings of no more than about \$875 per month, on average. This amount varies by state, however, from \$269 in Alabama to \$2,243 in Minnesota. (The next highest state is Hawaii, where families with income up to \$1,740 may be eligible for TANF). The amount families may receive in TANF cash assistance also varies from \$170 per month for a family of three in Mississippi to \$923 in Alaska; the national average is \$445 (Giannarelli et al. 2017).

### OVERVIEW OF TANF WORK REQUIREMENTS

When TANF was created as part of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, it introduced federal time limits on program participation and work requirements. Although under the previous cash assistance program, Aid to Families with Dependent Children, states were able to obtain federal waivers to experiment with state work requirements, TANF introduced federal work requirements. Federal law requires states to (1) ensure that cash assistance recipients are working within 24 months of receiving assistance, or sooner if the state deems them to be ready for work, and (2) achieve annual work participation rates. States face potential financial penalties unless they engage at least 50 percent of all cash assistance families with a work-eligible adult and 90 percent of two-parent families with two work-eligible adults in specified work or work-related activities for a minimum number of weekly hours on average each month. However, states can reduce those percentages if they reduce their TANF cash assistance caseloads or increase their state spending.

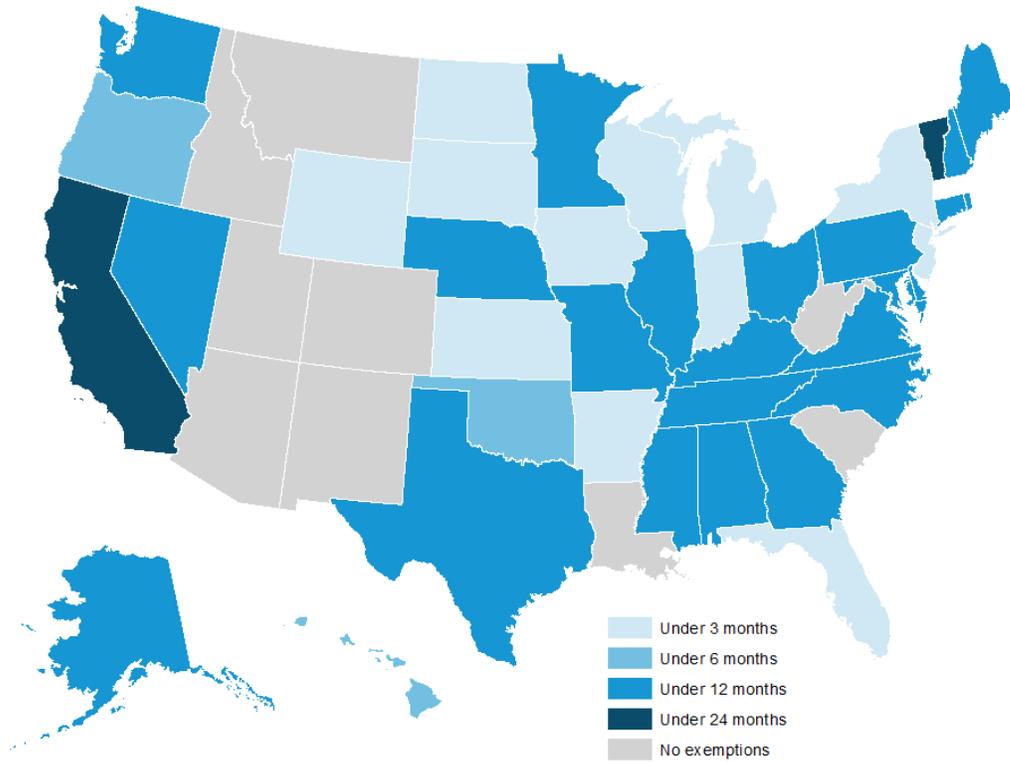
The federal calculation of a state's work participation rate only includes TANF families that meet the minimum hours requirement and participate in one or more federally specified work activities

(Hahn, Kassabian, and Zedlewski 2012). To count toward the federal calculation of the state's work participation rate, single parents must engage in work activities for at least 30 hours on average per week each month, or 20 hours if they have a child under age 6. Adults in two-parent families must collectively engage in work activities for at least 35 hours per week, or 55 hours if they receive federally subsidized child care assistance. The work activities specified in federal law generally include employment, job searches, and community service programs. TANF recipients engaged in these core work activities may spend additional hours in training and education directly related to employment.<sup>8</sup> Some of these activities may only be counted for a limited time. For example, job search activities are limited to the hourly equivalent of six weeks per year. States have flexibility to allow cash assistance recipients to engage in other work activities, but only the federally specified activities count toward a state's work participation rate. In 2016, for example, 43 states treated postsecondary education as a work-related activity for some recipients, even though it cannot count toward the state's work participation rate.<sup>9</sup> See appendix A for state-by-state information. Data from the Administration for Children and Families show that the most common work activity is unsubsidized employment, followed distantly by job searching.<sup>10</sup>

Similarly, the federal government sets exemptions from the work participation rate calculation, but states can exempt families under more or fewer circumstances if they choose. For example, single parents with children under a year old and parents caring for a disabled family member are exempt from the federal calculation of a states' work participation rate, but the state may choose to require them to engage in work activities nonetheless, or the state may choose to exempt them for a longer period. Figure 1 illustrates the range of state TANF exemptions for parents of young children. Other state exemptions (which do not necessarily remove families from the federal work participation rate calculation) include adults who are elderly, pregnant, caring for a child, ill or incapacitated, or caring for an ill or incapacitated person. Figure 2 illustrates the range of state TANF exemptions for adults who themselves are ill or incapacitated and those who are caring for others. State exemption rules can also vary depending on whether the family has one or two parents, the age of the head of household, and the age of children in the home. Finally, states determine sanctions, or the consequences of not meeting work requirements, which range from warnings to temporary reductions in a family's benefits to termination of a family's benefits. For repeated noncompliance with work requirements, nearly all states terminate the family's benefits for a period of time or until they are compliant; Idaho, Indiana, Michigan, Mississippi, Washington, and Wisconsin close the family's TANF case permanently.<sup>11</sup>

FIGURE 1

States with TANF Work Requirements Exemptions for Recipients Caring for a Child under a Certain Age (in months)

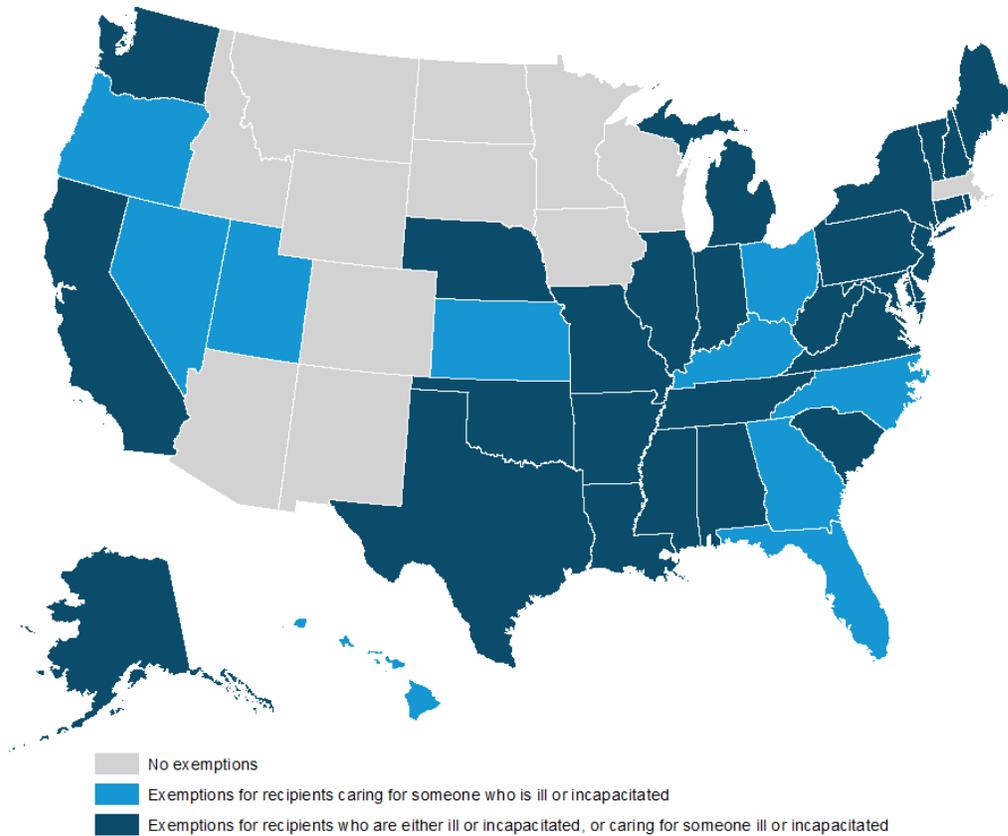


Source: Giannarelli et al. (2017).

Notes: TANF = Temporary Assistance for Needy Families. Nebraska places recipients caring for children under 3 months old in an alternative component that is automatically exempt from work requirements. See Giannarelli et al. (2017) for more details.

FIGURE 2

States with TANF Work Requirements Exemptions for Recipients Who Are Ill or Incapacitated or Caring for Someone Who Is Ill or Incapacitated



Source: Giannarelli et al. (2017).

Notes: All states that exempt a recipient who is ill or incapacitated also exempt a recipient caring for someone who is ill or incapacitated.

### LESSONS FROM TANF WORK REQUIREMENTS

Research on the effectiveness of work requirements in TANF comes largely from the first decade of TANF, the period from the late 1990s through the early 2000s when the economy was stronger than it was in the past decade; such research also comes from welfare-to-work experiments that predated TANF. This research found that

1. employment increases were modest and decreased with time;
2. work requirements did not increase stable employment in most cases, and when it did, the increase was small;

3. recipients with major employment barriers, such as physical and mental health conditions, did not find work; and
4. most recipients remained poor (Pavetti 2016).

A study of the long-term effects of mandatory welfare-to-work programs during the 1990s found that few of the programs increased job-finding rates for participants above the already high job-finding rates of peers not participating in the programs. Although welfare-to-work program participants worked more quarters and earned more than the control groups, family net income remained largely unaltered, with most families still living in poverty (Hamilton et al. 2001).

Further, studies have found disparate policy and employment impacts for African American people and people of other races. African American people receiving TANF have less stable employment, are hired less often, and are more likely to cycle back to TANF, suggesting that African American job seekers face structural disparities and discrimination in employment practices that make it more challenging for them to find and keep jobs despite work requirements. State TANF policies are disproportionately restrictive and less generous in states where a larger share of the general population is African American. For example, states with higher concentrations of African American people tend to have more severe sanctions for an initial incident of noncompliance with the work requirement. A 5 percentage-point increase in the African American share of the population is associated with a nearly 10 percentage-point increase in the probability of having harsher initial sanctions (Hahn et al. 2017). African American TANF recipients also are more likely to face sanctions and caseworker bias in sanctioning decisions, indicating the importance of considering not only written policies but also caseworker discretion in the implementation of work requirements (McDaniel et al. 2017).

Research on TANF also shows that states have developed strategies to meet federal work participation rate requirements that do not always entail more people engaging in work or work-related activities (Schott and Pavetti 2013). For example, states have used federal rules that allow them to reduce their required work participation rates by decreasing the overall size of their TANF caseload and by increasing the amount of state resources for TANF-related activities (Hahn, Kassabian, and Zedlewski 2012).<sup>12</sup> Most states also use only state funds and no federal TANF funds to support certain individuals or categories of TANF recipients who they believe will benefit from activities that are not federally countable (e.g., higher education) or who are less likely to engage in work activities for the required number of hours; doing so removes these TANF cases from the calculation of the federal work participation rate (GAO 2010). As of 2010, 29 states used state-only funds to serve two-parent families, families engaged in postsecondary education, or families with significant barriers to employment, including families with disabled members or recent immigrants (GAO 2010).

Further, the complexity of the TANF rules leads caseworkers to spend a considerable amount of time tracking and verifying clients' work activities and hours, in turn limiting caseworkers' time available to connect families with needed work and other support services. Caseworkers must track every hour that TANF recipients spend in each type of work activity, and recipients typically must document their time and activities in writing each month (Hahn and Loprest 2011; Schott and Pavetti 2013; Zedlewski and Golden 2010).

## Work Requirements in SNAP

The Supplemental Nutrition Assistance Program, formerly known as food stamps, provides noncash benefits to low-income households for purchasing food. As an entitlement program, the federal government funds SNAP benefits and matches states' administrative costs. Income eligibility for SNAP includes a gross income test of 130 percent of FPL, which is higher than for TANF in every state except for Minnesota (Giannarelli et al. 2017).<sup>13</sup>

### OVERVIEW OF SNAP WORK REQUIREMENTS

The Food Stamp Program was legislated in 1964 and amended in 1971 to include most of the work-related rules still in SNAP today. Federal rules require that able-bodied adult recipients who are not exempt (sometimes called "work registrants") comply with a general work requirement. They must register to work, accept a job if offered, and not quit a job without good cause. Recipients are exempt from these requirements if they are under age 16 or over age 59; working at least 30 hours a week; "physically or mentally unfit for employment" as defined by the state;<sup>14</sup> caring for children under age 6 or an incapacitated person; participating in treatment or rehabilitation; enrolled in school, training or higher education at least half time; receiving unemployment compensation; or complying with work requirements under certain other programs.<sup>15</sup> States also operate SNAP Employment and Training (E&T) programs, which are intended to help participants build job skills, receive training, find work and increase work experience.<sup>16</sup> States have discretion to make certain recipients mandatory or voluntary participants in SNAP E&T programs. In 2017, about half of state SNAP E&T programs focused on voluntary participants (Rowe, Brown, and Estes 2017).

When recipients fail to comply with the general work requirement, they are disqualified from SNAP. Federal law requires recipients be disqualified for a minimum of one month for their first failure to comply, three months for the next, and six months for the third. States can set longer periods of disqualification, can make disqualification permanent after the third noncompliance, and can sanction

the entire household for the head of household's noncompliance. In 2016, 24 states set the minimum disqualifications, 17 states extended the periods of disqualification, and 4 states both extended the periods of disqualification and sanctioned the entire household (USDA 2017). See appendix B for state-by-state information.

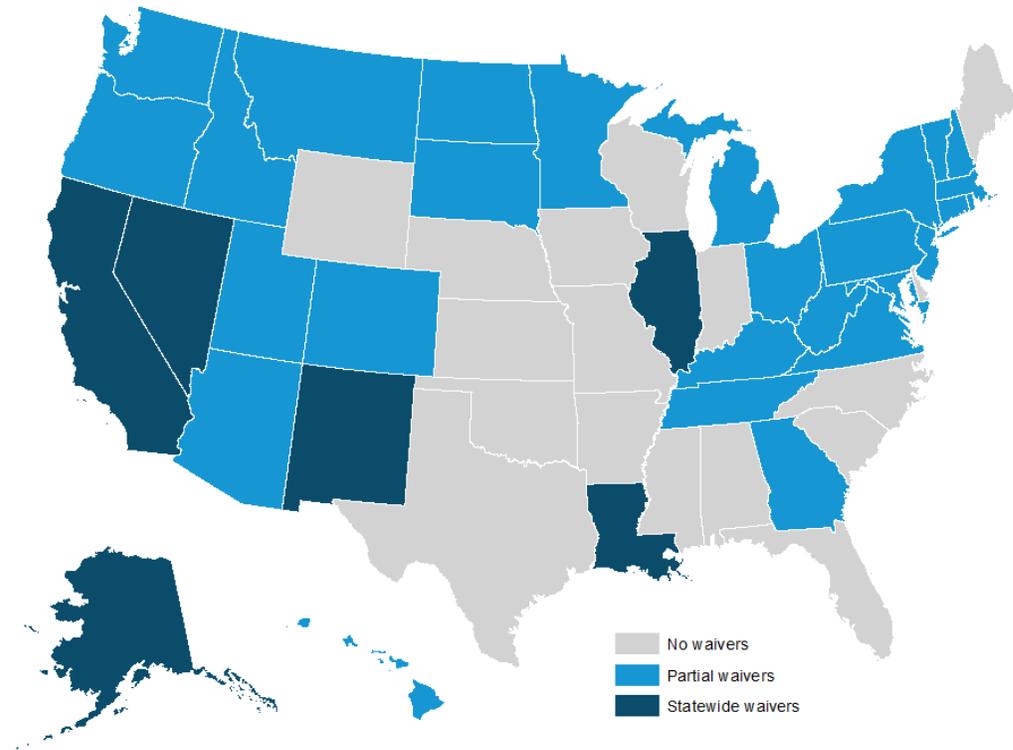
In 1996, the Personal Responsibility and Work Opportunity Reconciliation Act legislated a time limit for a subset of “work registrants”: able-bodied adults without dependents (ABAWDs), including those who are noncustodial parents supporting their children through child support payments. Their benefits are limited to 3 months of assistance within a 36-month period unless they are participating in work activities for at least 20 hours a week. Recipients are exempt from the time limits 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.<sup>17</sup>

States can use SNAP E&T to help ABAWDs meet work requirements but are not required to do so.<sup>18</sup> States that pledge to serve all ABAWDs with time limits in SNAP E&T programs can receive an additional \$20 million outside of the federal funding for program operation. In 2017, Colorado, Delaware, Michigan, South Dakota, and Texas have pledged to provide E&T programs to anyone who wants them.<sup>19</sup> Services provided in each pledge state vary.

During times of high unemployment, states can request temporary federal waivers of the ABAWD time limit, although general work requirements still apply.<sup>20</sup> For the federal government to waive the ABAWD time limit, a county must have an unemployment rate above 10 percent or the state must otherwise prove a lack of jobs. Every state except Delaware has sought a waiver at some point (Bolen and Dean 2017). Many states received such waivers during the economic downturn for all or part of the state, and some remain in effect (figure 3).<sup>21</sup>

FIGURE 3

States with Statewide or Partial ABAWD Waivers in Final Quarter of 2017



Source: Quarter 4 2017 waiver status from “ABAWD Waivers,” US Department of Agriculture, Food and Nutrition Service, last published October 2, 2017, accessed December 20, 2017, <https://www.fns.usda.gov/snap/abawd-waivers>.

Notes: ABAWD = able-bodied adults without dependents. ABAWD waivers are generally approved for 12 months. Waivers can be statewide (full waivers) or cover partial areas of the state (partial waivers).

### LESSONS FROM SNAP WORK REQUIREMENTS

Following debate around expanding work requirements in SNAP, in 2015 Congress funded 10 pilot projects to test a range of strategies to increase employment and earnings and reduce the need for nutrition assistance among SNAP participants. SNAP E&T pilot programs in California, Delaware, Georgia, Illinois, Kansas, Kentucky, Mississippi, Virginia, Vermont, and Washington received a total of \$165 million in awards (Food and Nutrition Service 2016).<sup>22</sup> Most of the projects include case management, individualized plans, and support services such as child care and transportation. The projects vary in target population (e.g., ABAWDS, people experiencing homelessness, those with substance abuse, and people experiencing long-term unemployment) and in the range and intensity of services offered.<sup>23</sup>

Research shows that 68 percent of SNAP recipients are exempt from general work requirements and that 13 percent are already working (Lee 2016). Among ABAWDs, 25 percent work while receiving SNAP, and 75 percent worked the year before or after receiving benefits (Carlson, Rosenbaum, and Keith-Jennings 2016). Many recipients who work may not be able to identify how many hours they work each week because they have temporary employment. These recipients face difficulty documenting their work hours for purposes of compliance as well as the danger that they will lose benefits if their hours fall in any given month (Phillips 2016).

Among those who are not working, research shows high rates of disability and caregiving responsibilities. For example, a report from Franklin County, Ohio, of a Work Experience Program for ABAWDs found that 30 percent reported a physical and mental limitation, and 17 percent reported filing for Supplemental Security Income or Social Security Disability Insurance. Thirteen percent reported being caregivers to parents, relatives or friends (Ohio Association of Foodbanks 2015). Moreover, it can be hard for SNAP recipients to find and maintain work, especially for those with low education levels, racial and ethnic minorities, and those with criminal records (Bolen and Dean 2017; Carlson, Rosenbaum and Keith-Jennings 2016). In the study in Franklin County, Ohio, 30 percent of clients had no high school degree or GED certificate. Thirty-five percent of clients had felony convictions (Ohio Association of Foodbanks 2015).

Critics of the time limit argue that it removes benefits even if participants are looking for work but cannot find a job, and SNAP is not required to offer a work or training program for them (Carlson, Rosenbaum, and Keith-Jennings 2016). Even with SNAP E&T programs, funding is limited given the number of potentially eligible SNAP participants who might benefit from program services (Phillips 2016). Further, research suggests that administering the time limit is complicated and error prone (Bolen and Dean 2017).

Some have suggested that SNAP time limits for ABAWDs promote employment, citing evidence from Kansas that when the time limit was restored after the waiver ended, 60 percent of the affected SNAP recipients found employment within 12 months, and incomes rose an average of 127 percent a year (Bolen and Dean 2017; Ingram and Horton 2016). However, these results would be expected regardless of the time limit change. SNAP is often used during short periods of unemployment,<sup>24</sup> and most ABAWDs work the year before or after receiving SNAP, regardless of work requirements (Carlson, Rosenbaum, and Keith-Jennings 2016). Further, although incomes rose with employment, 80 percent of those employed in Kansas remained either below 100 percent of the federal poverty level or in “severe poverty.”<sup>25</sup>

## Work Requirements in Federal Housing Assistance

Public housing and the housing choice voucher (previously called Section 8) programs are two core housing assistance programs funded by the US Department of Housing and Urban Development. Families living in public housing or mixed-income developments pay income-based rents for apartments owned by local housing agencies. Families renting with a voucher pay income-based rents for privately owned apartments, while the federal government pays the rest directly to the landlord.

Individuals and families with incomes at or below 50 to 80 percent of their area median income are eligible for housing assistance. However, housing assistance is not an entitlement program, and in general housing assistance only serves about 25 percent of eligible households (See Scally et al., forthcoming, for an overview of federal housing assistance programs.) For families that make it on the waiting list, the average wait time to receive a housing voucher is 2.5 years (Kingsley 2017; Watson et al. 2017).

### OVERVIEW OF HOUSING ASSISTANCE WORK REQUIREMENTS

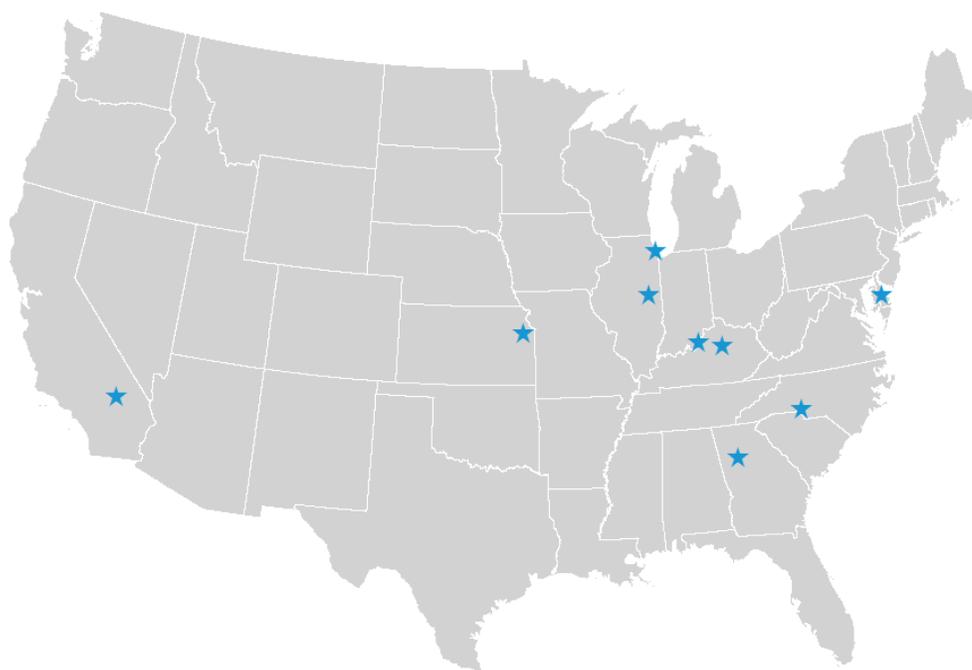
Since the passage of the Quality Housing and Work Responsibility Act of 1998 (Hunt, Schulhof, and Holmquist 1998), adult residents of public housing are required to meet an eight-hour monthly community service or self-sufficiency requirement (Falk, McCarty, and Aussenberg 2014). However, this is not a work requirement per se. Many activities, including volunteer work, community service, job-readiness or other training, literacy classes, or financial counseling, can satisfy this requirement. Tenants are exempt if they are employed, over age 62, disabled, caretakers of disabled household members, meeting TANF's requirements, or exempt from TANF's requirements because of the age of their youngest child or other reasons.

Although residents in public housing developments and housing choice voucher participants do not face federal work requirements, several of the US Department of Housing and Urban Development's Moving to Work (MTW) agencies have chosen to implement work requirements. As of 2015, nine public housing authorities<sup>26</sup> had implemented work requirements in some portion of their public housing portfolio; seven agencies have work requirements in their housing choice voucher program.<sup>27</sup> Figure 4 identifies the public housing authorities in the MTW demonstration that implemented work requirements. The agencies' policies vary in who is required to participate, how work is defined, and how the requirements are structured and enforced (Webb, Frescoln, and Rohe 2015). In some agencies, work requirements apply to only the head of household; in others, it applies to all adult members of the household. Although elderly residents are exempt from work requirements in all sites, some define elderly as age 62 or older and others as age 55 or older. Some public housing authorities require wage

employment; others allow work-related activities, such as training, education, or Family Self-Sufficiency<sup>28</sup> programs. Similarly, hours of work required range from 15 to 37.5 hours a week, with most agencies requiring 20 or 30 hours per week. Work requirements also vary by minimum wage requirements, support services offered, and whether work requirements are coupled with time limits (Levy, Edmonds, and Simington, forthcoming).

FIGURE 4

#### Public Housing Authorities in the Moving to Work Demonstration That Implemented Work Requirements in Public Housing



Source: Levy, Edmonds, and Simington (forthcoming).

Notes: Some of these housing authorities are at the city level; others are at the county or state level.

#### LESSONS FROM HOUSING WORK REQUIREMENTS

Information is limited about the public housing agencies implementing work requirements, the success of these approaches, and the cost of administering the programs (Levy, Edmonds and Simington, forthcoming). However, research does show that many public housing residents are either exempt from the work requirement or are already working. In 2015, 81 percent of households receiving housing assistance were elderly, were disabled, or included a member who worked (Fischer 2016). Among nonelderly and nondisabled households served in 2015, 65 percent were currently working, receiving

unemployment insurance, or had worked the year before. Among those not working, 8 percent were receiving TANF and were thus subject to TANF work requirements, and 14 percent were caring for a young child or disabled family member (Center on Budget and Policy Priorities 2016).

Little evidence is available about the outcomes of work requirements in housing assistance (Levy, Edmonds, and Simington, forthcoming).<sup>29</sup> One study of work requirements in the Charlotte, North Carolina, public housing authority found gains in employment, though the income gains were not sufficient to support households moving off of housing assistance (Rohe, Webb, and FrescoIn 2016). The study also found no increase in average hours worked and no increase in evictions due to sanctions for noncompliance with work requirements. The field lacks information about the structure and implementation of work requirement policies in housing assistance programs, the numbers and characteristics of residents affected, and their outcomes (Brick and McCarty 2012; Levy, Edmonds, and Simington, forthcoming).

## Work Requirements in Medicaid

The Medicaid program, funded jointly by federal and state governments, was established in 1965 to provide health coverage for specific categories of adults and children with disabilities or receiving cash assistance. Over time, Medicaid expanded to cover additional low-income children, pregnant women, and parents. In 2010, the Affordable Care Act (ACA) further expanded Medicaid eligibility to nonelderly, nonpregnant, nondisabled childless adults and parents with incomes up to 138 percent of FPL (“expansion” Medicaid enrollees), but a Supreme Court decision made this an option for states.<sup>30</sup> To date, 32 states and the District of Columbia have expanded Medicaid eligibility under the ACA,<sup>31</sup> bringing total Medicaid enrollment nationwide to 68.3 million in October 2017.<sup>32</sup>

### OVERVIEW OF PROPOSED MEDICAID WORK-RELATED REQUIREMENTS

At present, Medicaid does not mandate work-related activities as a condition of eligibility. Previous attempts to implement work-related requirements as a condition of Medicaid eligibility have been denied by CMS, which oversees Medicaid. CMS did approve employment initiatives in Pennsylvania (2014) and Indiana (2015) to link enrollees to work search and training programs on a voluntary basis.<sup>33</sup> However, this year, CMS indicated a willingness to consider work-related requirements in Medicaid. As of December 2017, eight states have submitted proposals for work-related requirements under Medicaid waivers to CMS (figure 5).<sup>34</sup> Among these states, Maine and Wisconsin would also impose



beneficiaries would have to engage in employment or work-related activities for a minimum of 20 hours a week or 80 hours a month.<sup>40</sup> Failure to meet the work-related requirements would lead to the loss of benefits until such requirements were met, and those found to be falsely reporting compliance could face a six-month disenrollment penalty in Kentucky<sup>41</sup> and a one-year enrollment ban in Arizona.<sup>42</sup> The waiver applications generally lack details on how compliance would be tracked and what processes or documentation would be required from enrollees to demonstrate that they are meeting work-related requirements. Only about half the states offer any information on whether assistance would be available to beneficiaries to help them meet the work-related requirements. Indiana has established an optional resource center for Medicaid beneficiaries subject to work-related requirements; Kentucky proposed covering the cost of the GED exam; and Kansas, Mississippi, Utah, and Wisconsin proposed partnering with existing employment and training programs, such as those operating for SNAP and TANF recipients. It is unclear how many additional public resources would be available to support these activities and whether they would be sufficient to help Medicaid enrollees comply with the requirements.

#### CONSIDERATIONS FOR POTENTIAL MEDICAID WORK REQUIREMENTS

Given the lack of experience with work-related requirements in Medicaid, there is no solid information on what impacts they might have in the program. However, recent analyses suggest that the majority of Medicaid beneficiaries would be exempt from proposed work-related requirements because of their disability or health status, because they are already working, or because they would be exempt for other reasons, such as attending school or caring for children. Estimates from the March 2017 Current Population Survey found that almost 25 million Medicaid beneficiaries in 2016 could be considered able-bodied nonelderly adults (defined as not receiving Supplemental Security Income). Of this group, 8 out of 10 lived in working families (with 64 percent living in a family with a full-time worker), and a majority (60 percent) were working themselves (Garfield, Rudowitz, and Damico 2017). Among those who were not working, 36 percent had an illness or disability, 30 percent had caregiving obligations, 15 percent were enrolled in school, 6 percent were searching for a job, another 9 percent were retired, and 3 percent cited other reasons for not working (Garfield, Rudowitz, and Damico 2017). Similarly, a study examining health and employment status of Medicaid expansion populations using data from the 2015 National Health Interview Survey found that almost half (48 percent) of expansion enrollees had a disability, a serious physical or mental health condition, or poor health.<sup>43</sup> Of the remaining Medicaid expansion beneficiaries, 62 percent were already working or in school, and 12 percent were looking for work. The study found that about 13 percent of Medicaid expansion beneficiaries nationally would be subject to proposed work-related requirements because they were not working, attending school, or

looking for employment, but that three-quarters of them were not working because they were caring for family members.<sup>44</sup> A survey of expansion Medicaid beneficiaries in Michigan found that more than half were working or going to school, and the majority of those unable to work reported poor health and disabilities as reasons for not working (Tipirneni, Goold, and Ayanian 2017).

Despite the exemptions from work-related requirements for certain beneficiaries, policy analysts have expressed concern that work-related requirements as proposed in Medicaid would lead to coverage losses<sup>45</sup> and ultimately make it more difficult for people with physical, mental, and behavioral health issues to access needed health care and be able to work (Kaiser Family Foundation 2017; Youdelman, Perkins, and McDonald 2017). There is particular concern about potential adverse impacts on enrollees who have high health care needs but who do not qualify for disability benefits. Medicaid beneficiaries can have disabilities or serious health problems that may not necessarily qualify them for disability benefits but may prevent them from holding and retaining jobs (e.g., diabetic nerve pain). Although these beneficiaries would be exempt from work-related requirements in most states, their incapacity would need to be certified by a health care professional, and understanding that process and obtaining necessary assessments and documentation could be difficult, leading to loss of Medicaid benefits. For example, research shows that TANF recipients with disabilities and poor health are more likely to lose benefits, often because they are unable to navigate the public assistance system (Hasenfeld, Ghose, and Larson 2004). Moreover, there is concern among advocates that work-related requirements in Medicaid would have adverse effects on families with school-age children or disabled household members, given that most states are proposing only to exempt caregivers with dependent children under age six;<sup>46</sup> parents with school-age children or those caring for a disabled spouse or parent would be subject to the requirements but may have great difficulty participating in specified work-related activities (National Women's Law Center 2017; Wikle 2017).<sup>47</sup> Finally, some analysts are also concerned that Medicaid beneficiaries who are already working could be deterred from enrollment by requiring them to demonstrate compliance with Medicaid work-related initiatives through additional documentation and reporting (Wikle 2017).<sup>48</sup>

One question that has arisen in policy discussions is whether Medicaid expansion discourages employment (Dague, DeLeire, and Leininger 2014). Several studies have found no adverse employment effects of Medicaid expansion under the ACA (Garrett, Kaestner, and Gangopadhyaya 2017; Gooptu et al. 2016; Kaestner et al. 2015; Leung and Mas 2016). Moreover, recent studies show that access to Medicaid benefits or subsidized private coverage may actually make it easier for people to look for jobs or keep working (Majerol and Tolbert 2016; Ohio Department of Medicaid 2017).<sup>49</sup>

## Key Questions for Consideration

Although discussions of potential new or expanded work requirements in various programs tend to focus on who would be subject to or exempt from work requirements and what activities would satisfy the requirements, more fundamental questions about the purpose, expected outcomes, practical implementation, and associated costs of work requirements are worth careful consideration. Here are several important questions for consideration:

- **Does a work requirement help meet the mission of the program?** Consideration should be given to the purpose of the program and whether work requirements further those goals, particularly given the characteristics of the people served by or eligible for the program.
- **Are jobs available for individuals participating in these programs, particularly for those who may have limited education or other challenges affecting employment?** The common rationales for work requirements are built on the expectation that jobs are available and that work requirements are useful for ensuring that people do not choose to depend on government assistance instead of working. However, it is worth verifying that available work is also likely to be attainable by people who may have limited education and work histories or other challenges that may influence the types of work they can obtain.
  - » **Is the available work likely to end the need and eligibility for assistance?** Many jobs in the current economy not only offer low wages but also are temporary or involve unpredictable, fluctuating schedules and few benefits, making it difficult even for those who seek to work full time to support themselves and their families (Ben-Ishai 2015; Gehr 2017). Will some families with working adults still need some types of assistance to meet basic needs? To what extent would work and community engagement requirements lead recipients to acquire employer-sponsored or other commercial health insurance? What are the implications for state and federal spending on safety net programs and for out-of-pocket spending by individuals and families on housing, health care, and food? How would state finances be affected by any resultant change in economic activity or in the number of people receiving public assistance? Would any state savings be offset by growth in the uninsured population and uncompensated care?
- **Who will provide and fund employment services?** The major funding stream for the workforce development system is the Workforce Innovation and Opportunity Act, which supports American Job Centers (formerly called one-stop career centers) that facilitate connections

between employers and job seekers. If clients are referred to American Job Centers for employment services, do the American Job Centers have the capacity and funding to serve more customers? Current Workforce Innovation and Opportunity Act funding limitations already require state and local workforce systems to make tough choices about funding the programs and populations prioritized in the workforce system, even before considering additional populations driven to the American Job Centers through potential new work requirements (Spaulding 2015).

- **Where adequate employment is not available, what other work-related activities may be available?** SNAP requires participants to register for work and not quit a job but does not penalize participants if paid employment is not available. TANF recipients who cannot find unsubsidized employment must participate in work-related activities, such as a job search and job-readiness training, which generally is provided or funded by TANF program. Housing agencies with work requirements vary in whether activities other than paid employment satisfy the requirement. States proposing Medicaid work requirements include a range of qualifying activities such as job searches, education and training, and volunteering, but they generally fail to specify whether and how access to these alternatives to paid employment would be secured to help participants meet the work requirements.
- **If program participants lack the skills to obtain employment, would job or skills training be provided? Does the program have the capacity and funding to provide training?** SNAP and housing programs currently have much less funding available for employment and training efforts than TANF (Falk, McCarty, and Aussenberg 2014). Although Medicaid dollars can be used to fund employment services for people with disabilities,<sup>50</sup> will similar initiatives for able-bodied Medicaid beneficiaries be funded and, if so, by whom and through what mechanisms?
- **Who would administer and enforce work requirements?**
  - » **Are program eligibility systems and workers equipped to incorporate the added responsibilities of monitoring compliance with work activities and tracking employment?** Many social service programs rely on outdated technologies that are cumbersome to reprogram to accommodate new policies or processes (Loprest, Gearing, and Kassabian 2016). Changes to policies and processes also require staff training, and introducing new work requirements could involve significant changes to staff roles. To what extent would Medicaid managed-care organizations and housing providers be involved in monitoring compliance?

- » **Would the added responsibilities require renegotiating contracts with unionized workers?** With new requirements for customers come new responsibilities for front line staff and supervisors. Where staff roles are governed by union contracts, such changes in responsibility require consideration of union rules (Hahn, Amin, et al. 2016).
- » **What are the administrative costs of developing and maintaining the infrastructure for implementing work requirements?** Consideration needs to be given to the costs of developing new systems, adapting technology, training staff, and supporting an ongoing increased workload associated with new or expanded work requirements (Holcomb and Martinson 2002). TANF caseworkers often spend considerable time monitoring and enforcing work requirements (Hahn and Loprest 2011; Schott and Pavetti 2013; Zedlewski and Golden 2010); implementing similar work requirements in other programs with much larger numbers of participants likely would require substantial new resources.
- **To what extent would work and community engagement requirements and associated work supports affect beneficiary self-efficacy, sense of dignity, and empowerment?** These types of outcomes have not been typically tracked in evaluations of social safety net programs, but potential improvements in self-efficacy, dignity, and empowerment are often cited as a rationale for imposing work requirements. To what extent do work and community engagement requirements affect long-term financial independence and mobility out of poverty? How does improved personal and financial well-being affect health outcomes? Will work and community engagement requirements have any impact on population health (e.g., alcohol and drug abuse, child abuse, and suicide rates)?
- **When individuals receive benefits from multiple programs with work requirements, will one program's requirements take priority? If so, which one?**
  - » **How will programs track which participants are receiving multiple benefits and their compliance with work requirements?** Cross-program communication and data sharing may be needed if programs integrate or defer work requirements. The extent of integration and data sharing across programs varies by state and program. SNAP and TANF programs tend to be closely linked, often sharing workers and data systems, but housing agencies often have little to no interaction with these other programs (Falk, McCarty, and Aussenberg 2014). Some states are proposing to exempt enrollees participating in SNAP or TANF employment initiatives from Medicaid work requirements but provide little details about how compliance would be monitored.

- **What are the implications for children? For children with disabilities?**
  - » Will parents of school-age children and children with disabilities be guaranteed appropriate and affordable child care during times that their parents are working or engaged in work activities? Child care is essential for facilitating parents' employment and engagement in work or training activities, but the supply and funding for child care is limited. Because of limited funding, only a small share of families needing child care assistance currently receive subsidies. The overall supply of quality child care, particularly care for infants, toddlers, and children with special needs, is also inadequate to meet demand. An additional challenge is the limited availability of high-quality child care during nonstandard or unpredictable work or training schedules, as well as during periods or times of day when school is not in session (Hahn, Adams, et al. 2016).
  
- **Do work requirement policies contribute to disparities across populations?** The experience with TANF work requirements and other state TANF policy decisions has been that African American people are disproportionately concentrated in states with less generous and more restrictive policies (Hahn et al. 2017) and that local policy implementation is subject to racial biases (Fording, Soss, and Schram 2007; Keiser, Mueser, and Choi 2004; Monnat 2010). These findings warrant careful consideration in the context of expanding state policy discretion in other programs. In addition to racial disparities, work requirement policies could have differential geographic impacts, affecting people in urban, suburban, and rural communities differently. Similarly, work requirement policies may affect outcomes for people with significant disabilities, including physical, mental health and substance abuse issues, but who may not be receiving disability benefits.
  
- **How many people would new work requirements affect?**
  - » How many people subject to new work requirements are already working? How many program recipients are children, elderly, or disabled? Any new or revised work requirements would need mechanisms for identifying program participants who are already working or would not be expected to work, such as children, the elderly and people with disabilities. If a large share of program participants are in these categories (such is the case for Medicaid programs as noted above), it could reduce the effort needed to implement work requirements but would also raise the question of whether the agency effort was worth the expected outcomes for those subject to the work requirements.

- **How will the impact of work requirements on intended and unintended outcomes be evaluated?** For example, will the program determine the extent to which any declines in caseload are because of work requirements leading to increased wages or because families are unable to navigate program processes and fail to receive needed assistance?
  - » Is there a threshold for potential negative outcomes beyond which the program would be ethically bound to reconsider its policy? If people are willing but unable to work, and work requirement processes cause them to not receive assistance for basic needs, is that acceptable?
  
- **How would proposed work requirements in Medicaid affect the role that Medicaid plays in providing access to needed care for a range of health problems?**
  - » How do work requirements affect access to health care for people with health problems? How does having continued Medicaid coverage affect job entry and retention?
  - » How would Medicaid work and community engagement requirements affect health care providers and health care utilization, spending, and health outcomes (e.g., missed appointment rates and forgone treatment due to work commitments, growth in uncompensated care for people who lose Medicaid coverage, increases in patient self-efficacy and mental health functioning related to greater community and work engagement, or increases in provider access with the shift from Medicaid to commercial insurance)?

To answer these questions about the purpose, expected outcomes, and practical implementation, and associated costs of work requirements, additional information is needed. The experiences with TANF and SNAP work requirements offer some useful insights, but the populations served by TANF and SNAP differ from each other and from the populations served by Medicaid and housing agencies. Further, information on the effectiveness of current work requirement policies is outdated or insufficient for fully understanding the implications for new or expanded work requirements. More study is needed to determine whether and how work requirements have the intended effects and produce any negative unintended consequences.

# Appendix A. State Details on TANF Work Requirements

Within federal guidelines, states set their own TANF program rules regarding which work activities to allow, when recipients must start meeting work requirements, which recipients are exempt, and the consequences for failing to meet requirements. States may allow recipients to engage in activities that do not help it meet federal requirements. States may also impose more restrictive rules than federal law requires. Table A.1 lists selected state TANF work requirement policies.

TABLE A.1

Work-Related Activity Requirements for Single-Parent TANF Recipients as of July 2016<sup>1</sup>

States	Timing of requirement relative to benefit receipt	Allowable activities listed <sup>2</sup>	Minimum hour requirement (weekly unless noted)	Limit on education and training hours that count toward work hour requirement
Alabama <sup>3</sup>	Immediately	Basic or remedial education, high school/GED, English as a second language, postsecondary education, job skills training, job readiness activities, job development and placement, job search, on-the-job training, unsubsidized employment, work supplement/subsidized job, self-employment, child care provision for others, community service	35 <sup>4</sup>	10 <sup>5</sup>
Alaska	Immediately	Basic or remedial education, high school/GED, English as a second language, postsecondary education, job skills training, job readiness activities, job development and placement, job search, on-the-job training, unsubsidized employment, work supplement/subsidized job, work experience programs, self-employment, life skills training, community service	30	No limit
<b>Arizona</b>				
All, except JOBSTART	Immediately	Basic or remedial education, high school/GED, English as a second language, postsecondary education, job skills training, job readiness activities, job development and placement, job search, on-the-job training, work experience programs	Case-by-case	No limit
JOBSTART	Immediately	Work supplement/subsidized job	40	n.a.

<b>Arkansas</b>	Immediately	Basic or remedial education, high school/GED, postsecondary education, job skills training, job readiness activities, job search, on-the-job training, unsubsidized employment, work supplement/subsidized job, work experience programs, self-employment, child care provision for others, counseling, life skills training, community service	30 <sup>4</sup>	10
<b>California</b> <sup>6</sup>	After assessment	Basic or remedial education, high school/GED, job skills training, job readiness activities, job search, on-the-job training, unsubsidized employment, work supplement/subsidized job, work experience programs, self-employment, counseling, community service <sup>7</sup>	30 <sup>4</sup>	No limit <sup>8</sup>
<b>Colorado</b> <sup>9</sup>	After assessment	Job readiness activities, job search, self-employment <sup>7</sup>	22	n.a.
<b>Connecticut</b>	Immediately	Basic or remedial education, high school/GED, English as a second language, postsecondary education, job skills training, job readiness activities, job development and placement, job search, on-the-job training, unsubsidized employment, work supplement/subsidized job, work experience programs, child care provision for others, counseling, community service	Case-by-case	No limit
<b>Delaware</b>				
All, except TWP <sup>10</sup>	Upon application <sup>11</sup>	Basic or remedial education, high school/GED, English as a second language, job skills training, job readiness activities, job search, on-the-job training, unsubsidized employment, work supplement/subsidized job, work experience programs, child care provision for others, counseling, life skills training, community service	30 <sup>4</sup>	10
TWP	Upon referral by DSS	Job skills training, job readiness activities, job development and placement, job search, on-the-job training, unsubsidized employment, work supplement/subsidized job <sup>12</sup>	Case-by-case	n.a.
<b>DC</b>	Immediately	Basic or remedial education, high school/GED, English as a second language, postsecondary education, job skills training, job readiness activities, job search, on-the-job training, unsubsidized employment, work supplement/subsidized job, self-employment, child care provision for others, community service	30 <sup>4</sup>	10 <sup>13</sup>
<b>Florida</b>	Immediately	Basic or remedial education, high school/GED, English as a second language, job skills training, job readiness activities, job search, on-the-job training, unsubsidized employment, work supplement/subsidized job, work experience programs, self-employment, child care provision for others	30 <sup>14</sup>	10

<b>Georgia</b> <sup>3</sup>	Immediately	Basic or remedial education, high school/GED, English as a second language, postsecondary education, job skills training, job readiness activities, job search, on-the-job training, unsubsidized employment, work supplement/subsidized job, work experience programs, self-employment, child care provision for others, counseling, life skills training, community service	30 <sup>15</sup>	No limit
<b>Hawaii</b>	Immediately	Basic or remedial education, high school/GED, English as a second language, postsecondary education, job skills training, job readiness activities, job search, on-the-job training, unsubsidized employment, work supplement/subsidized job, work experience programs, self-employment, child care provision for others, counseling, community service	30 <sup>4</sup>	No limit
<b>Idaho</b>	Immediately	Basic or remedial education, high school/GED, English as a second language, job skills training, job readiness activities, job search, unsubsidized employment, work supplement/subsidized job, work experience programs, self-employment, community service <sup>16</sup>	Number of work days in a month multiplied by 6 hours <sup>17</sup>	No limit
<b>Illinois</b> <sup>3</sup>	31 days after application	Postsecondary education, job skills training, job readiness activities, job search, on-the-job training, unsubsidized employment, work supplement/subsidized job, work experience programs, self-employment, counseling, life skills training, community service	30	No limit <sup>18</sup>
<b>Indiana</b>	Immediately	Basic or remedial education, high school/GED, English as a second language, postsecondary education, job skills training, job readiness activities, job development and placement, job search, on-the-job training, unsubsidized employment, work supplement/subsidized job, work experience programs, self-employment, counseling, life skills training, community service	30 <sup>4</sup>	No limit <sup>18</sup>
<b>Iowa</b>	Immediately	Basic or remedial education, high school/GED, English as a second language, postsecondary education, job skills training, job readiness activities, job search, unsubsidized employment, work experience programs, self-employment, child care provision for others, counseling, life skills training, community service	30 <sup>19</sup>	No limit

<b>Kansas</b>	Immediately	Basic or remedial education, high school/GED, English as a second language, postsecondary education, job skills training, job readiness activities, job search, on-the-job training, unsubsidized employment, work supplement/subsidized job, work experience programs, self-employment, counseling, life skills training, community service	30 <sup>20</sup>	10 <sup>21</sup>
<b>Kentucky</b>	Immediately	Basic or remedial education, high school/GED, English as a second language, postsecondary education, job skills training, job readiness activities, job development and placement, job search, unsubsidized employment, work supplement/subsidized job, work experience programs, self-employment, child care provision for others, counseling, life skills training, community service	30	No limit <sup>22</sup>
<b>Louisiana</b> <sup>3</sup>	Immediately	Postsecondary education, job skills training, job readiness activities, job search, on-the-job training, unsubsidized employment, work supplement/subsidized job, work experience programs, community service <sup>7</sup>	30 <sup>4</sup>	No limit <sup>23</sup>
<b>Maine</b>	Immediately	Basic or remedial education, high school/GED, English as a second language, postsecondary education, job skills training, job readiness activities, job development and placement, job search, on-the-job training, unsubsidized employment, work supplement/subsidized job, self-employment, child care provision for others, counseling, life skills training, community service	30 <sup>4</sup>	10 <sup>24</sup>
<b>Maryland</b>	Upon application	Basic or remedial education, high school/GED, English as a second language, postsecondary education, job skills training, job readiness activities, job search, on-the-job training, unsubsidized employment, work supplement/subsidized job, work experience programs, self-employment, child care provision for others, counseling, community service	30 <sup>25</sup>	16 <sup>26</sup>
<b>Massachusetts</b>				
Non-exempt	After 2 months of receiving assistance <sup>27</sup>	Basic or remedial education, high school/HiSET, English as a second language, postsecondary education, job skills training, job readiness activities, job development and placement, job search, on-the-job training, unsubsidized employment, work supplement/subsidized job, work experience programs, child care provision for others, counseling, community service, grandparent providing care for child in home, substance abuse treatment	30 <sup>28</sup>	No limit <sup>29</sup>
Exempt <sup>30</sup>	n.a.	n.a.	n.a.	n.a.

<b>Michigan</b> <sup>3</sup>	Upon application	Basic or remedial education, English as a second language, postsecondary education, job skills training, job readiness activities, job search, on-the-job training, unsubsidized employment, work supplement/subsidized job, work experience programs, self-employment, child care provision for others, community service	30 <sup>4</sup>	No limit
<b>Minnesota</b>	Immediately	Basic or remedial education, English as a second language, postsecondary education, job skills training, job readiness activities, job development and placement, job search, on-the-job training, unsubsidized employment, work supplement/subsidized job, work experience programs, self-employment, child care provision for others, counseling, life skills training, community service	130 hours per month	No limit
<b>Mississippi</b> <sup>3</sup>	Within 24 months of receiving assistance	Basic or remedial education, English as a second language, postsecondary education, job skills training, job readiness activities, job search, on-the-job training, unsubsidized employment, work supplement/subsidized job, work experience programs, self-employment, child care provision for others, life skills training, community service	40	No limit
<b>Missouri</b>	Within 24 months of receiving assistance <sup>31</sup>	Basic or remedial education, high school/GED, English as a second language, postsecondary education, job skills training, job readiness activities, job development and placement, job search, on-the-job training, unsubsidized employment, work supplement/subsidized job, work experience programs, self-employment, counseling	30 <sup>4</sup>	No limit
<b>Montana</b>				
All, except PAS	Upon application <sup>32</sup>	Basic or remedial education, high school/GED, English as a second language, postsecondary education, job skills training, job readiness activities, job search, unsubsidized employment, work experience programs, self-employment, community service	33 <sup>33</sup>	10 <sup>34</sup>
PAS	Immediately	Basic or remedial education, high school/GED, postsecondary education	12 school credit hours per semester <sup>35</sup>	No limit
<b>Nebraska</b>				
Time-limited assistance	Immediately	Basic or remedial education, high school/GED, English as a second language, postsecondary education, job skills training, job readiness activities, job search, on-the-job training, unsubsidized employment, work supplement/subsidized job, work experience programs, self-employment, counseling, life skills training, community service	30 <sup>4</sup>	No limit

Non-time-limited assistance	Immediately	Job skills training, job readiness activities, life skills training	30	No limit
<b>Nevada</b>	Immediately	Basic or remedial education, high school/GED, English as a second language, postsecondary education, job skills training, job readiness activities, job search, on-the-job training, unsubsidized employment, work supplement/subsidized job, work experience programs, self-employment, child care provision for others, counseling, life skills training, community service	30 <sup>4</sup>	No limit <sup>36</sup>
<b>New Hampshire</b> NHEP <sup>3</sup>	Immediately	Basic or remedial education, high school/GED, English as a second language, postsecondary education, job skills training, job readiness activities, job search, on-the-job training, unsubsidized employment, work supplement/subsidized job, work experience programs, self-employment, child care provision for others, counseling, life skills training	30	10 <sup>37</sup>
FAP <sup>30</sup>	n.a.	n.a.	n.a.	n.a.
<b>New Jersey</b>	Immediately	Basic or remedial education, high school/GED, English as a second language, postsecondary education, job skills training, job readiness activities, job search, on-the-job training, unsubsidized employment, work supplement/subsidized job, work experience programs, self-employment, child care provision for others, counseling, life skills training, community service <sup>38</sup>	35	No limit
<b>New Mexico</b>				
NMW	Within 3 months of receiving assistance	Basic or remedial education, high school/GED, English as a second language, postsecondary education, job skills training, job readiness activities, job search, on-the-job training, unsubsidized employment, work supplement/subsidized job, work experience programs, child care provision for others, counseling, life skills training <sup>39</sup>	34 <sup>40</sup>	14
EWP	Within 2 months after application	English as a second language, postsecondary education, job skills training, job readiness activities, job search, on-the-job training, unsubsidized employment, work supplement/subsidized job, work experience programs, community service	20	No limit
<b>New York</b> <sup>3</sup>	Upon application <sup>41</sup>	English as a second language, postsecondary education, job skills training, job readiness activities, job search, on-the-job training, unsubsidized employment, work supplement/subsidized job, work experience programs, self-employment, child care provision for others, community service	30 <sup>42</sup>	No limit

<b>North Carolina</b>	Immediately	Basic or remedial education, high school/GED, English as a second language, postsecondary education, job skills training, job readiness activities, job search, on-the-job training, unsubsidized employment, work supplement/subsidized job, work experience programs, self-employment, counseling, life skills training, community service	30 <sup>4</sup>	No limit <sup>24</sup>
<b>North Dakota<sup>3</sup></b>	Immediately	Basic or remedial education, high school/GED, postsecondary education, job skills training, job readiness activities, job development and placement, job search, on-the-job training, unsubsidized employment, work supplement/subsidized job, child care provision for others, counseling, community service	30 <sup>4</sup>	No limit
<b>Ohio</b>	Immediately	Basic or remedial education, high school/GED, English as a second language, postsecondary education, job skills training, job readiness activities, job search, on-the-job training, unsubsidized employment, work supplement/subsidized job, work experience programs, self-employment, child care provision for others, counseling, life skills training, community service	30	No limit <sup>43</sup>
<b>Oklahoma</b>	Immediately	Basic or remedial education, high school/GED, English as a second language, postsecondary education, job skills training, job readiness activities, job search, on-the-job training, unsubsidized employment, work supplement/subsidized job, work experience programs, self-employment, counseling, community service	30	No limit
<b>Oregon</b>				
All, except JOBS Plus	Immediately	Basic or remedial education, high school/GED, English as a second language, postsecondary education, job skills training, job readiness activities, job search, on-the-job training, unsubsidized employment, work supplement/subsidized job, work experience programs, self-employment, counseling, life skills training	Case-by-case	No limit
JOBS Plus <sup>44</sup>	n.a.	Job search, on-the-job training, work supplement/subsidized job	Case-by-case <sup>45</sup>	n.a.
<b>Pennsylvania</b>	Immediately	Basic or remedial education, high school/GED, English as a second language, postsecondary education, job skills training, job readiness activities, job search, on-the-job training, unsubsidized employment, work supplement/subsidized job, work experience programs, self-employment, child care provision for others, counseling, community service	30 <sup>4</sup>	No limit

<b>Rhode Island</b>	Upon application	Basic or remedial education, high school/GED, English as a second language, postsecondary education, job skills training, job readiness activities, job search, on-the-job training, unsubsidized employment, work supplement/subsidized job, work experience programs, child care provision for others, community service	30 <sup>4</sup>	No limit <sup>46</sup>
<b>South Carolina</b>				
All, except CARES <sup>3</sup>	Immediately	Job readiness activities, job search, life skills training <sup>47</sup>	30 <sup>4</sup>	n.a.
CARES	Immediately	Postsecondary education, job readiness activities, on-the-job training, counseling, life skills training, community service <sup>48</sup>	Case-by-case	No limit
<b>South Dakota</b> <sup>3</sup>	Immediately	Postsecondary education, job skills training, job search, on-the-job training, unsubsidized employment, work supplement/subsidized job, self-employment, child care provision for others, community service	30 <sup>4</sup>	10 <sup>49</sup>
<b>Tennessee</b>	Upon signing agreement	Basic or remedial education, high school/GED, English as a second language, postsecondary education, job skills training, job readiness activities, job search, on-the-job training, unsubsidized employment, work supplement/subsidized job, work experience programs, self-employment, counseling, life skills training, community service	30	No limit <sup>50</sup>
<b>Texas</b>	Upon signing agreement <sup>51</sup>	Basic or remedial education, high school/GED, English as a second language, postsecondary education, job skills training, job readiness activities, job search, on-the-job training, unsubsidized employment, work supplement/subsidized job, work experience programs, self-employment, community service	30 <sup>4</sup>	No limit <sup>52</sup>
<b>Utah</b>	Immediately	Basic or remedial education, high school/GED, English as a second language, postsecondary education, job skills training, job readiness activities, job search, on-the-job training, unsubsidized employment, work supplement/subsidized job, work experience programs, self-employment, counseling, life skills training, community service	30 <sup>4</sup>	10 <sup>53</sup>
<b>Vermont</b>	Immediately	Basic or remedial education, high school/GED, English as a second language, job skills training, job readiness activities, job search, on-the-job training, unsubsidized employment, work supplement/subsidized job, work experience programs, self-employment, child care provision for others, life skills training, community service	30 <sup>4</sup>	No limit
<b>Virginia</b>				
All, except VIEW <sup>30</sup>	n.a.	n.a.	n.a.	n.a.

VIEW	Immediately	Basic or remedial education, high school/GED, English as a second language, postsecondary education, job skills training, job readiness activities, job search, on-the-job training, unsubsidized employment, work supplement/subsidized job, work experience programs, self-employment, counseling, community service	35 <sup>54</sup>	15 <sup>49</sup>
Washington	Immediately	Basic or remedial education, high school/GED, English as a second language, postsecondary education, job skills training, job development and placement, job search, on-the-job training, unsubsidized employment, work supplement/subsidized job, work experience programs, self-employment, counseling, life skills training, community service	32 <sup>55</sup>	No limit
West Virginia	Immediately	Basic or remedial education, high school/GED, English as a second language, postsecondary education, job skills training, job readiness activities, job search, on-the-job training, unsubsidized employment, work supplement/subsidized job, work experience programs, self-employment, child care provision for others, counseling, life skills training, community service	30 <sup>4</sup>	10 <sup>24</sup>
<b>Wisconsin</b>				
W-2T	After assessment	Basic or remedial education, high school/GED, English as a second language, postsecondary education, job skills training, job readiness activities, job development and placement, on-the-job training, counseling, life skills training, community service	Case-by-case	12
CSJ	After assessment	Basic or remedial education, high school/GED, English as a second language, postsecondary education, job skills training, job readiness activities, job search, on-the-job training, life skills training, community service	Case-by-case	10
TEMP	After assessment	Work supplement/subsidized job	25 <sup>56</sup>	No limit
UE	After assessment	Unsubsidized employment	30	n.a.
Wyoming	Immediately	High school/GED, job skills training, job readiness activities, job search, on-the-job training, unsubsidized employment, work supplement/subsidized job, work experience programs, self-employment	30 <sup>4</sup>	20

Source: Table III.B.2 of Giannarelli et al. 2017.

Notes: n.a. = not applicable.

<sup>1</sup> This table contains the activity requirements for single-parent recipients 20 years old or older with children at least 6 years of age.

<sup>2</sup> Possible activities include the following: (a) Job-related activities include job skills training, job readiness activities, and job search; (b) Education and training (E&T) activities include basic or remedial education, high school/GED, English as a second language, postsecondary education (including vocational training), and on-the-job training; (c) Employment activities include unsubsidized job, work supplement/subsidized job, work experience program (CWEP and/or AWEP), self-employment, and community service; (d) Other allowable activities include child care provision for others, counseling, and life skills training.

<sup>3</sup> The state distinguishes between those with and without a high school diploma or GED. The requirements shown here are for TANF recipients who have obtained at least a high school diploma or GED.

<sup>4</sup> Recipients with children under six years old are only required to work 20 hours.

<sup>5</sup> In cases where the caseworker determines that educational activities are necessary for a recipient to overcome barriers to employment, the limit on the number of hours that may be spent in education may be waived.

<sup>6</sup> The list of potential activities includes all those allowed by the state. Counties choose whether to include all of the potential activities or a subset. All other activities requirements policies are statewide.

<sup>7</sup> Recipients move from one set of activities to another after a set period. Generally, they begin with job-related activities and end with employment.

<sup>8</sup> California allows clients to spend a total of 36 months in an education and training activity with no hourly limit; 24 months while on the Welfare-to-Work 24-Month Time Clock, and an additional 12 months aligned with federal requirements. After 36 months education can only be counted as a non-core activity.

<sup>9</sup> Counties have the option to vary their activity requirements. These policies refer to Denver County.

<sup>10</sup> This applies to non-exempt recipients who are unemployed.

<sup>11</sup> Participation in required activities is required for two weeks prior to receipt of benefits.

<sup>12</sup> Recipients in the transitional work program must develop an individualized transitional work plan with their case manager and comply with the activities requirements and deadlines established in the plan.

<sup>13</sup> Post-secondary education, basic education, ESL, and GED classes may all count towards the first 20 hours of participation if they can be considered as part of a Job Skills training program.

<sup>14</sup> On-the-job training and work supplementation require a full-time, 32- to 40-hour commitment.

<sup>15</sup> Recipients who are able to work 40 hours per week are required to do so. Recipients with children under six years old are only required to work 20 hours.

<sup>16</sup> Recipients with children under the age of 12 weeks are only required to participate in life skills training.

<sup>17</sup> Single parents who have children older than 12 weeks but younger than 6 months are only required to work 20 hours per month.

<sup>18</sup> This applies to post-secondary education only.

<sup>19</sup> Participation must be either equivalent to the level of commitment required for full-time employment or deemed significant enough to move the recipient toward full-time employment. Recipients with children under six years old are only required to work 20 hours.

<sup>20</sup> Single parents with children under age six are required to work a minimum of 20 hours per week.

<sup>21</sup> Post-secondary education can count towards the first 20 hours of the activity requirement.

<sup>22</sup> Post-secondary education can count towards the first 10 hours of the activity requirement after it has been counted as a core activity for 12 months.

<sup>23</sup> Vocational education may be used to satisfy all 30 hours of the work requirement. Post-secondary education may be included if applicable, but does not count towards the required hours.

<sup>24</sup> The number of hours that may be spent in education and training is not capped for parents of children under six years old.

<sup>25</sup> The state requires recipients to work 40 hours, but recipients caring for a child age six or older are not sanctioned if working at least 30 hours, and recipients caring for a child under six years old are not sanctioned if working at least 20 hours.

<sup>26</sup> Recipients who participate in any activity or set of activities for 40 hours per week will continue to receive benefits in the form of cash assistance. However, if the recipient fails to participate for 40 hours per week, his or her benefit is reduced by the hourly minimum wage for each hour he or she fails to participate.

<sup>27</sup> Non-exempt adults are expected to use this 60-day period for job search prior to the imposition of work program requirements.

<sup>28</sup> Recipients with children under six years old are only required to work 20 hours. Recipients with children under two years old are placed in the exempt component and do not have work requirements.

<sup>29</sup> An education or training activity cannot exceed 24 months.

<sup>30</sup> Recipients in this component are not required to participate in work activities.

<sup>31</sup> The requirement is imposed at 24 months or until the state determines the recipient is work ready, whichever is sooner.

<sup>32</sup> The unit may request for work-related activity requirements to begin on the first day of the month following the month of application.

<sup>33</sup> Recipients with children under six years old are only required to work 27 hours.

<sup>34</sup> The number of hours that may be spent in education and training is capped at two hours for parents of children under six years old.

<sup>35</sup> Recipients in this component must be enrolled in at least 12 credit hours per semester and up to a maximum of 30 credit hours per year.

<sup>36</sup> Vocational educational training is limited to a 12-month lifetime limit.

<sup>37</sup> Individuals may count vocational and postsecondary education as core activities for 12 months with no limit on the hours per week. After 12 months as a core activity, there is a 10-hour limit. Certain types of basic or remedial education and ESL can count towards the first 20 hours.

<sup>38</sup> Life skills training refers to the TANF Initiative for Parents (TIP), which offers parenting skills assistance to mothers of children under 12 months of age.

<sup>39</sup> Education Works program activities are focused on education and training; however, with program approval, participants may also take part in any other activity relevant to their education and pursuant to the New Mexico Works Cash Assistance Program.

<sup>40</sup> Recipients with children under six years old are only required to work 24 hours.

<sup>41</sup> The social services official shall ensure that each parent or caretaker of a dependent child is engaged in work as soon as practicable, but no later than 24 months (whether or not consecutive) from initial receipt of assistance.

<sup>42</sup> Recipients can be assigned to work activities for up to 40 hours per week, unless otherwise limited.

<sup>43</sup> For education and training hours, no more than twelve months of vocational educational training will count toward work participation in a lifetime.

<sup>44</sup> All recipients in JOBS Plus are working for an employer, receiving actual wages, reimbursed by the state.

<sup>45</sup> Under JOBS Plus, the employer pays the client actual wages, while the state reimburses the employer the wages. During the time a recipient participates in a JOBS Plus activity, the recipient does not receive TANF or SNAP benefits. Any benefits received are paid out in the wages, which are at minimum the value of the TANF benefit or higher.

<sup>46</sup> Individuals with reading test scores below third grade level or below sixth grade level, if the individual has very limited or no prior work experience, may participate in educational activities with no limit on the number of hours for six months as part of an intensive work readiness program. Post-secondary education can count towards the first 20 hours of the activity requirement.

<sup>47</sup> Post-secondary education is an allowable activity for those who are not considered job-ready.

<sup>48</sup> Recipients experiencing disabilities that prevent full-time participation, but who are able to participate in limited work and training activities, may participate in any cash assistance work program activities for which they qualify even though special accommodations may be needed. The participant's disability must prevent full participation in these cash assistance work activities for 90 days or longer.

<sup>49</sup> This limit does not apply to postsecondary education that is considered vocational training, which is considered a core activity.

<sup>50</sup> This limit does not apply to vocational education or degree programs directly related to employment in current or emerging occupations for the first 12 months. Post-secondary education can count towards the first 20 hours.

<sup>51</sup> Adults added to the unit because they have moved into the household or are no longer disqualified are required to attend a workforce orientation.

<sup>52</sup> Recipients with children under six years old must spend all required hours in non-education-related activities.

<sup>53</sup> Education and training may only count as an allowable activity for 12 months in a recipient's lifetime. After the initial 12 months, education and training services may only count towards 10 non-priority hours a week. This limit on hours is for basic or remedial education, high school or GED, and English as a second language activities. Recipients with children under six years old must spend all required hours in non-education-related activities.

<sup>54</sup> These hours refer to a unit's collective hour requirement if no one in the unit is employed full time. Recipients employed full time are required to work 30 hours.

<sup>55</sup> Recipients with children under six years old are only required to work 20 hours.

<sup>56</sup> Custodial parents in TEMP placement have a 25 hour minimum requirement. Noncustodial parents in TEMP are not subject to a minimum requirement.

# Appendix B. State Details on SNAP Work Requirement Disqualification Policies

When SNAP recipients fail to comply with the general work requirement, they are disqualified from SNAP. Federal law requires recipients be disqualified for a minimum of one month for their first failure to comply, three months for the next, and six months for the third. States can extend the periods of disqualification, can make disqualification permanent after the third noncompliance, and can sanction the entire household for the head of household’s noncompliance. States can impose any combination of these options. Table B.1 identifies the options chosen by each state as of October 2016.

TABLE B.1

State SNAP Work Requirements and Disqualification (DQ) Policy as of October 2016

States	Regulatory minimum	Extended DQ period only	Entire household DQ only	Extended DQ and entire household	Extended DQ, permanent DQ, and entire household
Alabama		X			
Alaska	X				
Arizona			X		
Arkansas		X			
California	X				
Colorado	X				
Connecticut				X	
Delaware	X				
DC	X				
Florida			X		
Georgia	X				
Hawaii	X				
Idaho		X			
Illinois		X			
Indiana	X				
Iowa		X			
Kansas		X			
Kentucky		X			
Louisiana				X	
Maine	X				
Maryland	X				
Massachusetts			X		
Michigan		X			
Minnesota			X		
Mississippi					X

Missouri	X		
Montana	X		
Nebraska			X
Nevada		X	
New Hampshire		X	
New Jersey	X		
New Mexico	X		
New York		X	
North Carolina		X	
North Dakota	X		
Ohio	X		
Oklahoma	X		
Oregon	X		
Pennsylvania	X		
Rhode Island			X
South Carolina	X		
South Dakota		X	
Tennessee		X	
Texas			X
Utah		X	
Vermont	X		
Virginia			X
Washington	X		
West Virginia		X	
Wisconsin	X		
Wyoming		X	

Source: USDA (2017).

# Notes

1. For a discussion of the history of the welfare-to-work experiments, see Gueron and Rolston (2013) and Bopp and Falk (2012).
2. Helly Lee, “Kansas Time Limit on SNAP: Are People Really Better Off?” Center for Law and Social Policy blog, March 2, 2016, <https://www.clasp.org/blog/kansas-time-limit-snap-are-people-really-better>; and Meg Wingerter, “Governor Touts Poverty Reduction, but Many Still Struggling,” Kansas Health Institute, February 25, 2016, <http://www.khi.org/news/article/governor-touts-poverty-reduction-but-80-removed-from-food-stamps-still-belo>.
3. Thomas E. Price and Seema Verma, letter to the nation’s governors, March 14, 2017, <https://www.hhs.gov/sites/default/files/sec-price-admin-verma-ltr.pdf>.
4. Robert Pear, “Trump Administration Will Support Work Requirements for Medicaid,” *New York Times*, November 7, 2017, <https://www.nytimes.com/2017/11/07/us/politics/trump-work-requirements-medicaid.html>.
5. Suzanne Wikle, “Work Requirements in Medicaid Would Add More Red-Tape and Barriers to Health Coverage,” *Say Ahhh!* (blog), November 3, 2017, <https://ccf.georgetown.edu/2017/11/03/work-requirements-in-medicaid-would-add-more-red-tape-and-barriers-to-health-coverage/>.
6. Brandon Lipps, letter to state SNAP commissioners, November 30, 2017, <https://www.usda.gov/sites/default/files/documents/lipps-snap-letter.pdf>.
7. The federal government funds TANF as a block grant to states, and states are required to contribute funds, called “maintenance of effort.”
8. The nine “core” work activities specified in federal law are unsubsidized employment, subsidized private sector employment, subsidized public sector employment, on-the-job training, job searches and job-readiness training, work experience, community service, vocational educational training, and providing child care to a community service participant. “Noncore” activities that may be counted if a participant is engaged in core activities for at least 20 hours per week include job skills training directly related to employment and, only for those who have not received a high school diploma or equivalent, high school attendance or education directly related to employment. See *Ensuring That Recipients Work*, 45 CFR 261.
9. See table III.B.2 of Giannarelli et al. 2017.
10. Postsecondary education is not included in the federal measures. For more information on work activities among TANF recipients, see <https://www.acf.hhs.gov/sites/default/files/ofa/wpr2016table06c.pdf>
11. Table L7 of Giannarelli et al. (2017).
12. To receive federal TANF block grant funds, states are required to spend at least a specified amount each year for purposes related to cash assistance; child care assistance; or educational activities designed to increase self-sufficiency, job training, and work. These activities must be focused on families who would be eligible for TANF cash assistance, even though the family does not need to be receiving cash assistance. In addition, states may count spending on activities related to the additional TANF purposes of reducing nonmarital childbearing and promoting healthy marriage and responsible fatherhood, regardless of whether the beneficiaries are eligible for TANF cash assistance. For more information, see the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, Pub. L. No. 104-193, 110 Stat. 2105.
13. Minnesota’s maximum income for initial eligibility for TANF is just over 130 percent of the federal poverty level. Until this year, no state had come close to that maximum income.
14. For more information on definitions of disability, see Morris and Goodman (2014).
15. See Work Provisions, 7 CFR 273.7(b).

16. For more, see “Training Policy in Brief,” National Skills Coalition, accessed December 19, 2017, [https://www.nationalskillscoalition.org/resources/publications/tpib/file/NSC\\_Training\\_SNAP\\_2014.pdf](https://www.nationalskillscoalition.org/resources/publications/tpib/file/NSC_Training_SNAP_2014.pdf).
17. “Able-Bodied Adults without Dependents (ABAWDs),” Food and Nutrition Service, last published October 25, 2017, accessed December 19, 2017, <https://www.fns.usda.gov/snap/able-bodied-adults-without-dependents-abawds>.
18. For more see Snap to Skills (2016).
19. Jen Fifield, “New Work Requirements Put Food Stamps at Risk,” *Stateline* (blog), January 19, 2016, <http://www.pewtrusts.org/en/research-and-analysis/blogs/stateline/2016/01/19/new-work-requirements-put-food-stamps-at-risk>.
20. “Able-Bodied Adults without Dependents (ABAWDs),” Food and Nutrition Service, last published October 25, 2017, accessed December 19, 2017, <https://www.fns.usda.gov/snap/able-bodied-adults-without-dependents-abawds>
21. “Able-Bodied Adults without Dependents (ABAWDs),” Food and Nutrition Service, last published October 25, 2017, accessed December 19, 2017, <https://www.fns.usda.gov/snap/able-bodied-adults-without-dependents-abawds>
22. Brooke DeRenzis, “Ten States Receive SNAP E&T Pilot Grants,” National Skills Coalition blog, March 20, 2015, <https://nationalskillscoalition.org/news/blog/ten-states-receive-snap-et-pilot-grants>;
23. See Table 1 of Food and Nutrition Service (2016).
24. Helly Lee, “Kansas Time Limit on SNAP: Are People Really Better Off?” Center for Law and Social Policy blog, March 2, 2016, <https://www.clasp.org/blog/kansas-time-limit-snap-are-people-really-better>
25. Meg Wingerter, “Governor Touts Poverty Reduction, but Many Still Struggling,” Kansas Health Institute, February 25, 2016, <http://www.khi.org/news/article/governor-touts-poverty-reduction-but-80-removed-from-food-stamps-still-belo>
26. Atlanta, GA; Champaign, IL; Charlotte, NC; Chicago, IL; Delaware; Lawrence-Douglas, KS; Lexington, KY; Louisville, MO; and San Bernardino, CA.
27. For more on public housing authorities in the Moving to Work demonstration that implemented work requirement see Levy, Edmonds, and Simington (forthcoming).
28. Family Self-Sufficiency programs help families increase earned income and start interest-bearing escrow accounts. For more information, see Office of Public Housing and Voucher Programs and Office of Public Housing Investments (2016).
29. The ability to draw conclusions about outcomes for residents is limited because of poor data.
30. Kevin Russell, “Court Holds That States Have Choice Whether to Join Medicaid Expansion,” *SCOTUSblog*, June 28, 2012, <http://www.scotusblog.com/2012/06/court-holds-that-states-have-choice-whether-to-join-medicaid-expansion/>.
31. “Where States Stand on Medicaid Expansion Decisions,” National Academy for State Health Policy, last updated November 8, 2017, accessed December 20, 2017, <http://www.nashp.org/states-stand-medicaid-expansion-decisions/>; Maine is expected to expand Medicaid next year following a successful ballot referendum in early November 2017. See Amber Phillips, “Maine Voters Just Resoundingly Approved a Medicaid Expansion. Their Governor Is Trying to Stop It from Going into Effect,” *Washington Post*, November 8, 2017, [https://www.washingtonpost.com/news/the-fix/wp/2017/11/07/maine-could-become-the-first-state-to-expand-medicaid-by-ballot-initiative/?utm\\_term=.44f913bd077e](https://www.washingtonpost.com/news/the-fix/wp/2017/11/07/maine-could-become-the-first-state-to-expand-medicaid-by-ballot-initiative/?utm_term=.44f913bd077e).
32. “October 2017 Medicaid and CHIP Enrollment Data Highlights,” Medicaid.gov, accessed December 20, 2017, <https://www.medicaid.gov/medicaid/program-information/medicaid-and-chip-enrollment-data/report-highlights/index.html>;
33. Although Indiana did implement its Gateway to Work program to connect interested beneficiaries to job searching and training opportunities, Pennsylvania’s waiver was not implemented due to a change in state

administration. Outside of its Medicaid waiver, Montana also implemented a state-funded voluntary job assistance program for Medicaid expansion beneficiaries in early 2016. See Kate Giammarise, “Wolf Begins Dismantling Healthy PA in Favor of Medicaid,” *Pittsburgh Post-Gazette*, February 9, 2015, <http://www.post-gazette.com/local/region/2015/02/09/Wolf-announces-plans-to-revamp-state-s-Medicaid-plan/stories/201502090152>, and Corin Cates-Carney, “State Launches Job Training Component of Medicaid Expansion,” *Montana Public Radio*, February 8, 2016, <http://mtpr.org/post/state-launches-job-training-component-medicaid-expansion>.

34. Three additional states, [Arizona](#), [Kansas](#), and [Mississippi](#), released draft waiver applications for public comments and may submit waivers proposing similar requirements to CMS soon.
35. Beneficiaries subject to work requirements in Maine would receive up to 3 months of coverage in a 36-month period without meeting the requirements; beneficiaries in Wisconsin would be eligible for a maximum of 48 months of coverage, with the clock stopping while enrollees are engaged in qualifying work activities.
36. Medicaid’s definition of able-bodied adults is not synonymous with the definition used by SNAP. A key difference is that in SNAP, work requirements apply to ABAWDs, whereas in Medicaid, several states are proposing to also impose work and work-related engagement requirements on parents and caretakers.
37. Arkansas and Wisconsin are exempting people over age 49; Indiana and Utah are exempting those age 60 or older.
38. Nate Checketts, letter to Brian Neale, deputy administrator and director, Centers for Medicare & Medicaid Services, August 15, 2017, <http://health.utah.gov/MedicaidExpansion/pdfs/Utah%201115%20PCN%20Waiver%20Revisions%2015%20Aug%202017.pdf>.
39. Of the 11 states proposing work-related requirements for Medicaid beneficiaries, Arkansas and New Hampshire have proposed work requirements for their expansion populations. Although North Carolina did not expand its Medicaid program as of December 2017, the state’s proposed work requirements would apply only to the expansion population on the condition the state legislation expanding Medicaid is enacted. Kansas, Maine, Mississippi, and Utah have proposed work requirements for traditional pre-ACA Medicaid eligibility groups, and Arizona, Indiana, and Kentucky have proposed work requirements for both traditional and expansion Medicaid enrollees. Wisconsin did not adopt the ACA Medicaid expansion but as of 2013 covers childless adults up to 100 percent of FPL, to whom the work requirements would apply.
40. Utah is requesting that eligible beneficiaries participate in online job searching and training for three months in every 12-month eligibility cycle, and beneficiaries in Indiana must work for at least eight months per every year of eligibility. In Kansas, proposed minimum weekly work requirements are 20 or 30 hours in a one-adult household, depending on whether the household contains a child under age six. Minimum weekly requirements are 35 or 55 hours in two-adult households.
41. Adam Meier, letter to Brian Neale, director, Center for Medicaid & CHIP Services, July 3, 2017,
42. Arizona Health Care Cost Containment System, “Arizona Section 1115 Waiver Amendment Request: Senate Bill 1092 Arizona Legislative Directives,” accessed December 22, 2017.
43. Leighton Ku and Erin Brantley, “Myths about the Medicaid Expansion and the ‘Able-Bodied,’” *Health Affairs Blog*, March 12, 2017, <http://www.healthaffairs.org/doi/10.1377/hblog20170306.059021/full/>.
44. Leighton Ku and Erin Brantley, “Myths about the Medicaid Expansion and the ‘Able-Bodied,’”
45. Phil Galetwitz, “Trump Administration Plan to Add Medicaid Work Requirement Stirs Fears,” *Kaiser Health News*, November 15, 2017; Leighton Ku and Erin Brantley, “Medicaid Work Requirements: Who’s at Risk?” *Health Affairs Blog*, April 12, 2017, <https://www.healthaffairs.org/doi/10.1377/hblog20170412.059575/full/>; Joan Alker, “Trump Administration’s New Medicaid Waiver Policy Will Increase Number of Uninsured: Kentucky Likely to Be First Approved,” *Say Ahhh* (blog), November 15, 2017, <https://ccf.georgetown.edu/2017/11/15/trump-administrations-new-medicaid-waiver-policy-will-increase-number-of-uninsured-kentucky-likely-to-be-first-approved/>.

46. Arkansas exempts people who live in a home with a dependent child age 17 or younger. Kentucky and Mississippi exempt all caregivers for a person who cannot care for themselves but are not specific about who would meet that criterion, and Wisconsin exempts all parents with dependent children.
47. “Fed Watch: How Placing Work Requirements on Medicaid Eligibility Punishes Caregivers,” ABetterBalance.org, November 20, 2017.
48. Arkansas, for example, would require that every Medicaid beneficiary subject to work requirements has an active email account and attests to meeting work requirements monthly via an online web portal. Previous research of citizenship documentation requirements in Medicaid found that in addition to dampening program enrollment, beneficiary documentation requirements present administrative burdens for states. See GAO (2007).
49. Institute for Healthcare Policy and Innovation, University of Michigan, “Medicaid Expansion Helped Enrollees Do Better at Work or in Job Searches,” press release, June 27, 2017, <http://ihpi.umich.edu/news/medicaid-expansion-helped-enrollees-do-better-work-or-job-searches>. Access to Medicaid coverage was also found to free up limited family resources for other basic needs such as housing and food, and thus improve individual and family finances and well-being. See Ohio Department of Medicaid (2017).
50. Jayson Gleneck, “Using Medicaid Funding to Support the Employment of People with Disabilities: A Federal Framework,” Disability and Employment Community of Practice, July 29, 2016, <https://disability.workforcegps.org/resources/2014/06/09/19/20/using-medicare-funding-to-support-the-employment-of-people-with-disabilities-a-federal-framework>.

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# Errata

This report was modified on December 28, 2017. The author list was incorrect; Laura Wheaton was not an author on this report. Table 1 was inserted. On page 17, “Kansas” was corrected to “Maine,” and note 35 was amended to discuss Maine rather than Kansas.

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