

# Fact Sheet: How the Proposed SNAP Time-Limit Rule Will Harm Children



## USDA PROPOSED SNAP TIME-LIMIT RULE WILL HARM CHILDREN'S ACCESS TO CRITICAL FOOD ASSISTANCE

Food insecurity remains a major threat to health and wellbeing of 12.5 million children in America.<sup>1</sup> This means that in 2017, 1 in 6 children lived in a household that had uncertain access to enough healthy food. Food insecurity has devastating consequences for children. Without access to healthy food, children suffer negative consequences to their health, education, and development. Studies show that food-insecure children are almost twice as likely to have fair or poor health, about one third more likely to be hospitalized since birth,<sup>2</sup> 14 percent more likely to show symptoms of anxiety and depression,<sup>3</sup> and 9.8 percent more likely to display hyperactivity.<sup>4</sup> Food insecurity is further linked to environments that promote obesity<sup>5</sup> as well as adverse educational outcomes, such as lower math and reading skills and higher rates of absenteeism and tardiness.<sup>6</sup>

As the nation's largest federal food assistance program, the Supplemental Nutrition Assistance Program (SNAP) is the first line of defense against child food insecurity. SNAP works efficiently and effectively by providing low-income households with monthly funds specifically designated for food purchases. Research links participation in SNAP for 6 months with an 8.5 percentage point decrease in food insecurity in households with children.<sup>7</sup>

Given their higher prevalence of food insecurity and high rates of participation, children are SNAP's greatest beneficiaries. In 2015, 19.2 million children relied on SNAP for access to consistent food. Beyond its role in fighting food insecurity, SNAP significantly reduces child poverty and helps struggling families to make ends meet: SNAP benefits lifted 1.5 million children out of poverty in 2017 alone.<sup>8</sup>

### Proposed Changes to SNAP Time-Limit Waivers

Under current law, individuals who are deemed Able-Bodied Adults Without Dependents (ABAWDs) are limited to accessing SNAP just three months out of every three years unless they can log 20 hours of work per week. However, these requirements are often untenable for individuals who face structural barriers to employment or sufficient work hours. As a result, states have flexibilities: they can exempt 12 percent of the impacted population from the time-limit, as well as apply for waivers for additional exemptions from the US Department of Agriculture (USDA) based on high unemployment rates.

A recent proposed rule from the US Department of Agriculture would undermine that flexibility by tightening the requirements by which states can receive time-limit waivers for so-called ABAWDs.<sup>9</sup> As a result, the agency expects over 750,000 individuals to lose access to SNAP. Already, this is a counterproductive and cruel policy: various studies illustrate that kicking people off of critical assistance programs does not help them achieve economic self-sufficiency, but instead harms their health and productivity.<sup>10</sup> Data from 2013 and 2014 shows that the overwhelming majority of SNAP participants who struggle to meet the threshold of 20 hours of work per week are not uninterested in working, but instead are experiencing the consequences of volatility in the low-wage labor market, caregiving duties, or personal health issues.<sup>11</sup>

## SPILOVER EFFECTS FOR CHILDREN AND YOUTH

However, this proposed rule would not just harm low-income adults facing barriers to employment. Instead, it will also have the unintended consequence of harming children and very vulnerable young adults.

### **Children with Non-Custodial Parents**

Though the SNAP time-limit explicitly exempts adults who have a dependent child under the age of 18 or live in a household with children under 18, this definition may not allow for the complex financial arrangements that low-income families utilize on to put food on the table. This is especially true for children with non-custodial parents who do not have custody of their children but who pay child support. Low-income non-custodial parents often rely on supplemental income through SNAP and other forms of assistance, such as the Earned Income Tax Credit, to be able to provide for their children and afford child support payments. If this population loses access to SNAP under the tightened waiver rules, it will undermine their ability to support their children.<sup>12</sup>

### **Children whose Extended Family Members Provide Financial Support**

Some low-income children may rely on food, financial assistance, or free childcare from extended family members, family friends, or a parent's significant other who do not live with them but use SNAP to supplement their income. Households that are the most financially precarious are the most likely to rely on such transfers to make ends meet. Considering that financially precarious households are often embedded together within the same networks, they likely received money or assistance from others who were also struggling economically.<sup>13</sup> If so-called Able-Bodied Adults Without Dependents in these networks lose SNAP benefits due to tightened state waiver rules, it would disrupt their ability to lend that crucial assistance to low-income children.

### **Children Impacted by the Opioid Crisis**

Today, more than 2.5 million children are being raised by their grandparents or other relatives, in part because families are dealing with parental alcohol and substance abuse issues, which are growing rapidly due to the opioid epidemic.<sup>14</sup> The adults who provide informal kinship care for children impacted by substance abuse issues may not do so on a consistent schedule, however. As a result, they may face obstacles in securing an exemption from ABAWD time-limits. If they lose access to SNAP in the face of tightened waiver requirements, the children they care for could experience increased poverty and food insecurity as a result.

### **Youth Aging out of Foster Care and Unaccompanied Homeless Youth**

Youth in foster care and unaccompanied homeless youth disproportionately experience significant barriers to obtaining a high school diploma, entering college, obtaining a driver's license, accessing health insurance, maintaining housing stability, and obtaining steady employment. SNAP plays a significant role in the health and well-being of youth aging out of care and unaccompanied homeless youth with no support systems. Former foster youth often experience poor nutrition and food insecurity, and SNAP benefits help to address this problem and increase the likelihood of healthy adult outcomes.<sup>15</sup> However, because former foster youth and unaccompanied homeless youth often meet the definition of an Able-Bodied Adult Without Dependents, they face obstacles accessing this critical assistance and would likely disproportionately suffer under tightened state waiver requirements. This is of particular concern after recent changes in the Agriculture Improvement Act of 2018 that reduced states' automatic exemption threshold from 15 percent to 12 percent

## CONCLUSION

Taking food off the table is no way to help individuals achieve economic mobility. In spite of that, USDA is pursuing administrative changes that will reduce state flexibility to exempt vulnerable adults facing structural barriers to employment from SNAP time-limits. What's worse, the proposed rule will almost certainly impact the ability of some children and vulnerable young adults to access the resources they need to provide for their most basic needs.

## TAKE ACTION

We encourage partners to submit comments on the SNAP ABAWD rule using the [www.regulations.gov](http://www.regulations.gov) portal before the deadline of April 2, 2019.

Please note that 30 percent of a comment submission must be original content. Individuals can also submit a form comment with a personal message by visiting <https://handsoffsnap.org>

## CONTACT

Send questions and general inquiries to Rachel Merker, Director of Policy and Research: [rachelm@firstfocus.org](mailto:rachelm@firstfocus.org).

## ENDNOTES

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11 Lauren Bauer, Diane Whitmore Schanzenbach, and Jay Shambaugh, "Work Requirements and Safety Net Programs," The Hamilton Project, October 2018, [http://www.hamiltonproject.org/assets/files/WorkRequirements\\_EA\\_web\\_1010\\_2.pdf](http://www.hamiltonproject.org/assets/files/WorkRequirements_EA_web_1010_2.pdf)

12 Heather Hahn, "Navigating Work Requirements in Safety Net Programs: Potential Pathways for Parents," The Urban Institute, January 2019, [https://www.urban.org/sites/default/files/publication/99479/navigating\\_work\\_requirements\\_in\\_safety\\_net\\_programs\\_0.pdf](https://www.urban.org/sites/default/files/publication/99479/navigating_work_requirements_in_safety_net_programs_0.pdf)

13 The Pew Charitable Trusts, "Extended Family Support and Household Balance Sheets: Getting by with a little help from friends and relatives," March 2016, [https://www.pewtrusts.org/-/media/assets/2016/03/fsm\\_kinshipbrief.pdf](https://www.pewtrusts.org/-/media/assets/2016/03/fsm_kinshipbrief.pdf)

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