

THE ABAWD TIME LIMIT IN MARYLAND: IMPACTS ON EMPLOYMENT AND SNAP PARTICIPATION

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The Supplemental Nutrition Assistance Program (SNAP)—formerly known as Food Stamps—has a long history of tying federal food assistance to work requirements for able-bodied adults without dependents (ABAWDs). The Food Stamp Act Amendment of 1970 contained the first set of ABAWD work requirements. Since the passing of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), the federal government has also imposed a three-month SNAP time limit for most ABAWDs unless they are employed or participating in a SNAP work program for at least 80 hours per month (Food and Nutrition Service [FNS], 2019).¹ This additional work requirement is called the ABAWD time limit.

Two flexibilities allow states to disregard the ABAWD time limit. First, federal law allows states to exempt up to 12% of their SNAP caseload that would become ineligible for benefits due to the ABAWD time limit (FNS, 2021). This is referred to as an *ABAWD discretionary exemption*.

The second flexibility permits states to apply for a waiver to the ABAWD time limit when facing extenuating economic circumstances such as high unemployment rates or an insufficient supply of jobs (PRWORA, 1996). During the Great Recession, USDA provided policy guidance to states that made any state eligible for extended unemployment benefits also eligible for ABAWD time limit waivers (FNS, 2009).² These waivers continued through December 2013, although USDA rules enabled most states to maintain their waivers through December 2015 (Bolen & Dean, 2018).

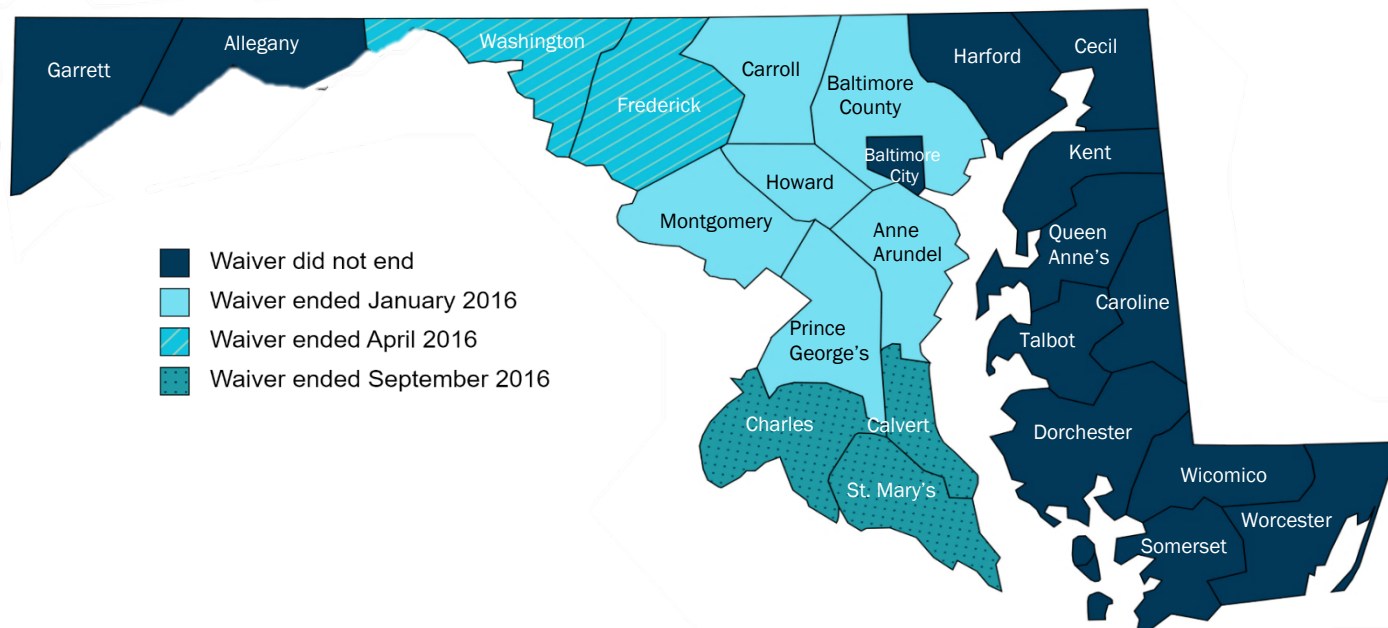
BACKGROUND & KEY FINDINGS

- **BACKGROUND:** The ABAWD time limit waiver granted by the federal government during the Great Recession ended for 11 of Maryland's 24 jurisdictions in 2016. ABAWDs in these jurisdictions were subject to a three-month SNAP time limit if they did not participate in employment or the work program.
- **EMPLOYMENT:** The policy change did not improve ABAWDs' quarterly employment. Less than half of ABAWDs (between 44% and 46%) were employed in the quarters in which they received SNAP *and* in the follow-up quarters, regardless of whether they lived in a jurisdiction in which the waiver ended or continued.
- **EARNINGS:** Quarterly earnings increased over time; however, this increase was unrelated to waiver status. ABAWDs who lived in jurisdictions in which waivers ended had a 61% increase in earnings over eight quarters. Similarly, ABAWDs in jurisdictions with waivers that continued had a 58% increase in earnings.
- **SNAP RECEIPT:** Although there were overall declines in SNAP participation during the study period, ABAWDs' participation decreased at a faster rate than participation among other adults. Moreover, ABAWDs subject to the time limit experienced a larger decline (65 percentage point decline) in participation over eight quarters compared to ABAWDs not subject to the time limit (54 percentage point decline).

¹ ABAWDs are generally limited to three months of SNAP receipt in a 36-month period. States can have a *fixed* or *rolling* 36-month clock for ABAWDs (United States Department of Agriculture [USDA], 2015). States with a fixed clock may have a general period that applies to the entire state, or an individual period unique to the individual. Maryland has a *fixed* clock with a *general* period. For example, there was a 36-month period for all Marylanders from January 2016 through December 2018 (Maryland Department of Human Services [DHS], 2016). SNAP recipients designated as ABAWDs could only receive three months of work-exempt SNAP benefits during that period.

² Extended unemployment benefits were passed under the [Unemployment Compensation Extension Act of 2008](#). The [American Recovery and Reinvestment Act of 2009](#) also suspended the time limit for waivers in all states from April 2009 through September 2010, although many states already had time limits waived.

Figure 1. Time Limit Waiver Status for Maryland Jurisdictions, 2016



The reinstatement of the ABAWD time limit prompted a flurry of research across the country examining the effects of the ABAWD time limit and work requirements on both employment and SNAP participation. The purpose of this current study is to build on previous research and analyze the effect of the reinstated time limit on ABAWDs' employment, earnings, and SNAP participation in Maryland. Effective January 1, 2016, Maryland no longer qualified for an automatic ABAWD time limit waiver; rather, the Maryland Department of Human Services (DHS) had to apply for waivers for individual jurisdictions with still-recovering economies. Throughout 2016, the ABAWD time limit policy was reinstated in 11 jurisdictions, as shown in Figure 1. This partial reimplementation facilitates a natural experiment, creating a comparison group to which outcomes can be compared. Using descriptive statistics and quasi-experimental methods, this study answers the following questions:

- 1) Are there differences in ABAWDs' employment, earnings, and SNAP participation when comparing ABAWDs in jurisdictions *with* time limit waivers to ABAWDs in jurisdictions *without* time limit waivers?
- 2) Can we attribute differences in employment, earnings, and SNAP participation to the expiration of time limit waivers?

The results of this study contribute to the ever-growing literature on SNAP work requirements and incentive effects in social assistance programs. Moreover, it provides stakeholders both in Maryland and at the federal level with concrete evidence of how the federal ABAWD time limit policy impacts employment, earnings, and SNAP participation in Maryland. The results from this study provide evidence that is critical to agricultural policy and can inform discussions as federal lawmakers negotiate the 2023 Farm Bill over the next year (Vollinger, 2022).

METHODS

Study Population

The focus of this study is able-bodied adults without dependents (ABAWDs) who received SNAP in Maryland for at least one month between January 2015 and December 2017. To reach this population, this study first identified all SNAP households during the study period, then determined if each unique household had an ABAWD coded in the administrative database. There were 235,545 unique ABAWDs in 226,078 unique SNAP households during the study period.

In this study, the unit of analysis is a quarter in which an ABAWD received SNAP. In other words, each quarter of receipt counts as an observation of SNAP receipt. If an ABAWD received more than one quarter of SNAP during the study period, that ABAWD had multiple observations. Given that there are 12 quarters between January 2015 and December 2017, each ABAWD in the population had a minimum of one quarter of receipt and a maximum of 12 quarters of receipt. If the ABAWD was on two different cases in the same quarter, one observation from one case was randomly selected for that quarter. In total, there were 911,591 observations throughout the study period. The ABAWD vignettes on page five provide practical examples that demonstrate the nature of the data.

Waiver Status (Policy Control and Policy Treatment Groups)

Each observation (i.e., quarter of SNAP receipt by an ABAWD) can fall into one of two groups: *waiver continued* (control) or *waiver ended* (treatment). Whether the waiver continued or ended in each

observation was determined by the ABAWD's jurisdiction during SNAP receipt (Figure 1) and the quarter of receipt (Table 1). Table 1 complements Figure 1 and demonstrates how observations of SNAP receipt fall into treatment and control groups throughout the study period. Observations that fall into the waiver continued (control) group are shown with dark blue shading in Table 1. For example, all observations across all quarters and years in Harford County are included in the waiver continued group. If an ABAWD received SNAP for two quarters between 2015 and 2017 and lived in Harford County, they would have two observations in the waiver continued group.

Observations that fall into the waiver ended (treatment) group are shown with light blue or teal shading in Table 1 and Figure 1. For example, Anne Arundel County's waiver ended in January 2016; therefore, observations that occurred between January 2015 and December 2015 in Anne Arundel County are included in the waiver continued (control) group, and all Anne Arundel County observations between January 2016 and December 2017 are included in the waiver ended (treatment) group. Observations without jurisdiction information were included in the waiver continued (control) group. This decision was based on data from the administrative data system that explicitly showed SNAP cases processed by the central DHS office had waivers throughout the entire study period

Table 1. Quarterly Time Limit Waiver Status between 2015 and 2017

	2015				2016				2017			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Waiver did not end <i>Allegany, Baltimore City, Caroline, Cecil, Dorchester, Garrett, Harford, Kent, Queen Anne's, Somerset, Wicomico, Worcester</i>	W	W	W	W	W	W	W	W	W	W	W	W
Waiver ended 1/2016 <i>Anne Arundel, Baltimore County, Carroll, Howard, Montgomery, Prince George's</i>	W	W	W	W				No Waiver				
Waiver ended 4/2016 <i>Frederick, Washington</i>	W	W	W	W	W				No Waiver			
Waiver ended 9/2016 <i>Calvert, Charles, St. Mary's</i>	W	W	W	W	W	W	W			No Waiver		
# of Jurisdictions with Waivers	24	24	24	24	18	16	16	13	13	13	13	13

Note: "W" represents the presence of the ABAWD time limit waiver in a given quarter. "Q" represents quarters each year. Q1 includes January, February, and March; Q2 includes April, May, and June; Q3 includes July, August, September; and Q4 includes October, November, and December.

As mentioned in the introduction, states have two main flexibilities around the ABAWD time limit policy. In addition to the time limit waiver, federal law provides each state with a certain number of discretionary exemptions to allow ABAWDs subject to the time limit to receive benefits without participating in employment or a work program (FNS, 2021). Given that the purpose of this study is to assess the impact of the time limit policy on ABAWDs' employment, this study includes observations within jurisdictions with discretionary exemptions in the waiver continued (control) group. In total, there were 249,275 waiver ended (treatment) observations and 662,316 waiver continued (control) observations, with a total of 911,591 quarterly observations of SNAP receipt by ABAWDs in Maryland (Table 2).

Table 2. Number of Quarterly SNAP Observations, 2015 to 2017

Waiver Ended	n= 249,275
<i>Quarters of SNAP receipt by ABAWDs in jurisdictions that limited ABAWDs to three months of SNAP</i>	
Waiver Continued	n= 662,316
<i>(1) Quarters of SNAP receipt by ABAWDs in jurisdictions that did not limit ABAWDs to three months of SNAP or (2) quarters of SNAP receipt by ABAWDs in jurisdictions that had not yet reinstated the time limit</i>	
Total Quarterly Observations	N= 911,591
<i>All quarters of SNAP receipt by ABAWDs in Maryland jurisdictions between 2015 and 2017</i>	

ABAWD VIGNETTES

These vignettes illustrate how analyses include quarterly observations in the *waiver ended* and *waiver continued* groups.

ABAWD #1: all observations in *waiver continued* group

ABAWD #1 lives in Worcester County, a jurisdiction in which the waiver continued throughout the *entire study period* (January 2015 through December 2017). They received SNAP from Q1-2015 through Q4-2016. ABAWD #1 has eight quarters of receipt. ABAWD #1 is in the *waiver continued* group for the *quarter of SNAP receipt* analyses and for each quarter after SNAP receipt. In other words, ABAWD #1 has eight observations in the *quarter of SNAP receipt* analyses. They are also included in the *waiver continued* group for the *first, fourth, and eighth quarter after SNAP receipt* analyses.

ABAWD #2: all observations in *waiver ended* group

ABAWD #2 lives in Frederick County, a jurisdiction in which the waiver ended in April 2016. They received SNAP from Q4-2016 through Q4-2017. ABAWD #2 has five quarters of receipt. ABAWD #2 is in the *waiver ended* group for the *quarter of SNAP receipt* analyses and for each quarter after SNAP receipt. In other words, ABAWD #2 has five observations in the *quarter of SNAP receipt* analyses. They are also included in the *waiver ended* group for the *first, fourth, and eighth quarter after SNAP receipt* analyses.

ABAWD #3: *quarter of* observations in *waiver continued* group; *follow-up* observations in *waiver ended* group

ABAWD #3 lives in Anne Arundel County, a jurisdiction in which the waiver ended in January 2016. They received SNAP in Q4-2015. ABAWD #3 has one quarter of receipt. ABAWD #3 is in the *waiver continued* group for the *quarter of SNAP receipt* analyses but is in the *waiver ended* group for each quarter after SNAP receipt. In other words, ABAWD #3 has one observation in the *quarter of SNAP receipt* analyses. They are included once in the *waiver ended* group for the *first, fourth, and eighth quarter after SNAP receipt* analyses.

ABAWD #4: multiple spells of receipt with observations in both the *waiver continued* and *waiver ended* groups

ABAWD #4 lives in Washington County, a jurisdiction in which the waiver ended in April 2016. They received SNAP in Q4-2015 and then received SNAP again from Q2-2016 through Q3-2016. ABAWD #4 has three quarters of receipt, so they have three observations in the *quarter of SNAP receipt* analyses. ABAWD #4 is in the *waiver continued* group for their Q4-2015 observation in the *quarter of SNAP receipt* analyses but is in the *waiver ended* group for their Q2-2016 and Q3-2016 observations in the *quarter of SNAP receipt* analyses. For the **Q4-2015 observation**, they are in the *waiver continued* group for the *first quarter after SNAP receipt* analyses and are in the *waiver ended* group for the *fourth and eighth quarters after SNAP receipt* analyses. For the **Q2-2016 and Q3-2016 observations**, they are included in the *waiver ended* group for the *first, fourth, and eighth quarter after SNAP*

Data Sources

Data come from the Client Automated Resource and Eligibility System (CARES) and the Maryland Automated Benefits System (MABS). CARES was the administrative data system for SNAP participation information through March

2020 when Maryland began its transition to a new system. The CARES system provides individual- and case-level data on demographics and program participation for households receiving SNAP. MABS is the administrative data system for Unemployment Insurance (UI) and includes data from all employers covered by the

state's UI law and the Unemployment Compensation for Federal Employees (UCFE) program. Together, these account for approximately 91% of all Maryland civilian employment.

There are several limitations to MABS data. First, MABS only reports data on a quarterly basis, which means that it is not possible to calculate weekly or monthly employment and earnings. Second, MABS does not contain data on certain types of employment, such as self-employment, independent contractors, and informal employment; consequently, earnings from under-the-table jobs are not included. In addition, MABS has no information on employment outside Maryland. Because out-of-state employment is common in certain Maryland jurisdictions, this report likely understates employment and is missing some earnings.

Data Analysis

This study utilizes descriptive statistics to describe ABAWD observations, including percentages, medians, and averages. The median represents the mid-point value, which can be found by arranging all values in numerical order and finding the middle value. When appropriate, this study also uses Pearson's chi-square to compare groups. Lastly, this study estimates the impact of the ABAWD time limit on employment and SNAP participation through quasi-experimental methods including fixed effects regressions and a

difference-in-differences approach.³ We include additional control variables in these analyses, described on page eight.

Sensitivity Analyses

Although not shown, this study includes additional analyses that test the impact of repeated observations of the same ABAWDs. Sensitivity analyses can provide additional support for the accuracy of the results (Thabane et al., 2013). Quasi-experimental methods were checked using multiple specifications of models. Descriptive statistics were checked by randomly selecting one observation per ABAWD during the study period. Except for earnings, both quasi-experimental and descriptive sensitivity analyses were similar across all findings.

Earnings sensitivity analyses showed that quarterly earnings were substantially higher when including only one randomly selected observation per ABAWD. For example, median quarterly earnings in the quarter of SNAP receipt were up to \$500 higher and median quarterly earnings in the eighth quarter of follow-up were up to \$700 higher. This difference is due to the person-quarter panel data structure. This data structure overrepresents ABAWDs who received SNAP for multiple quarters to paint a more accurate picture of expected results in any given quarter. ABAWDs with more quarters of SNAP receipt had lower median earnings than ABAWDs with fewer quarters of SNAP receipt.

³ For more information about panel estimation methods, please consult: Angrist & Pischke, 2009; Longhi & Nandi, 2015; Allison, 2009.

FINDINGS

Employment

Neoclassical economic theories of labor supply and incentive effects suggest that entitlement benefits can decrease individuals' willingness to work, commonly referred to as their labor supply (Moffit, 2002). From a policy standpoint, the primary purpose of weaving work requirements into policies is to ensure that benefits provided to individuals do not disincentivize work. Theoretically, then, the transition from *no work requirements* to *any work requirements* in an entitlement program such as SNAP should lead to a higher rate of employment among participants with work requirements compared to participants without work requirements.

Despite economic theory predictions, several studies over the last few years have shown that ABAWD work requirements in SNAP do not substantially increase employment (Feng, 2021; Gray et al., 2021; Han, 2022; Ritter, 2018; Wheaton et al., 2021; Harris, 2021). These studies used various quasi-experimental methods with consistent results: ABAWD work requirements have either no effect on employment (Feng, 2021; Gray et al., 2021; Ritter, 2018; Wheaton et al., 2021) or, at best, minimal practical effects (e.g., a one percentage point increase; Harris, 2021).

The first finding in this study is consistent with previous research. Figure 2 shows the percentage of *ABAWD observations* (referred to as *ABAWDs*) in this study who were employed in the quarter of SNAP

After controlling for the unemployment rate, jurisdiction, and individual characteristics, results show that the **EXPIRATION OF THE TIME LIMIT WAIVER** in 11 Maryland jurisdictions throughout 2016 had virtually **NO EFFECT ON ABAWDs' EMPLOYMENT** in the first, fourth, or eighth quarters after SNAP receipt.

receipt and in subsequent quarters. The light bars represent ABAWDs in the waiver ended (treatment) group who were subject to the time limit and the dark bars represent ABAWDs in the waiver continued (control) group who were not subject to the time limit. In any given quarter of SNAP receipt between 2015 and 2017, less than half of ABAWDs in both groups were employed.⁴ Specifically, 46% of ABAWDs in the waiver ended group were employed and 44% of ABAWDs in the waiver continued group were employed. In the first, fourth, and eighth quarters after SNAP receipt, ABAWDs' employment changed only slightly. By the eighth quarter after SNAP receipt, ABAWDs' employment in the waiver ended group was 44%, compared to 45% for ABAWDs in the waiver continued group. These small changes indicate that the expiration of ABAWD waivers throughout 2016 did not impact—and certainly did not increase—ABAWDs' employment.

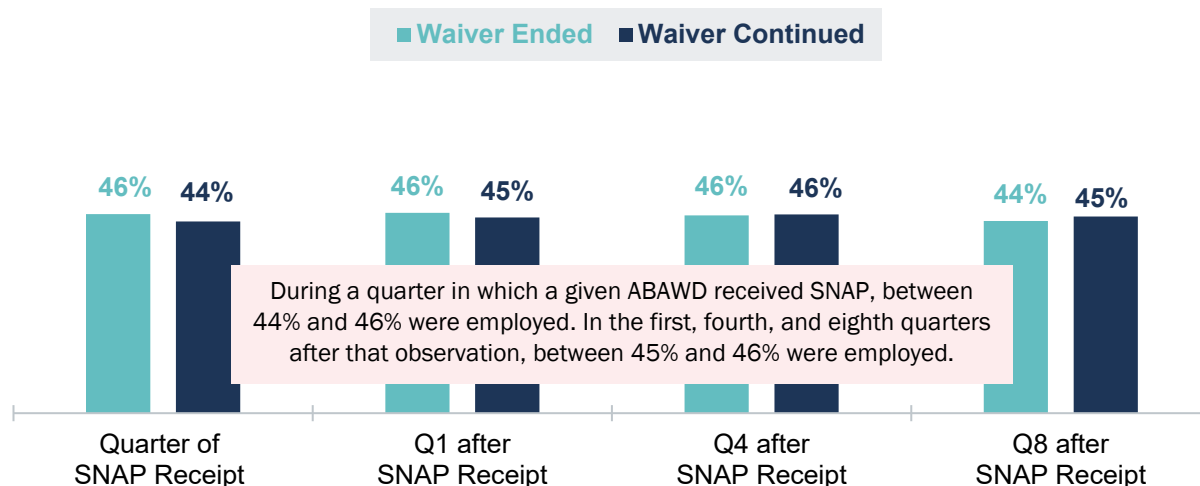
To further test the effects of the time limit waiver expirations on ABAWDs' employment, this study also uses fixed effects and difference-in-differences regressions. The benefit of these quasi-

⁴ Annual estimates of ABAWDs' employment in Maryland suggest that more than half of ABAWDs work while they receive SNAP (Hall, 2022). One reason the percentages in Figure 2 are lower than annual estimates is because Figure 2 measures *quarterly* employment. By design, a measure of quarterly employment will usually be lower than a measure of annual employment because there are fewer months available to capture employment.

experimental methods is that they can control for observed and unobserved factors that can affect employment. In this study, these methods controlled for local unemployment rates and other jurisdictional characteristics. They also controlled for characteristics of individuals such as

demographics, residence, and even unobserved factors such as an individual's motivation to work. These additional analyses further showed that the expiration of the time limit waiver (i.e., reinstatement of the ABAWD work requirements) had no practical effect on employment.⁵

Figure 2. Percentage of ABAWD Observations with Employment in Maryland



Note: One *quarter* of receipt by one ABAWD is one observation. Observations represent each quarter of SNAP receipt by an ABAWD between 2015 and 2017. Each observation is examined in the quarter of SNAP receipt and the quarters after that observation. Some ABAWDs had more than one quarter of receipt and therefore, more than one observation.

Earnings

Earnings among SNAP participants are typically low. In fact, most Maryland SNAP households are at or below poverty guidelines (Cronquist, 2021) with some estimates suggesting most ABAWDs subject to the time limit earn less than 50% of poverty guidelines (Wheaton et al., 2021). ABAWDs, specifically, have some of the lowest earnings in Maryland's program (Hall, 2021; 2022). In state fiscal year 2021, ABAWDs' median earnings while receiving SNAP were less than \$4,000 each quarter. In comparison, adults with children earned a

median of \$5,600 each quarter while receiving SNAP. Relatively low earnings, however, are partially a function of eligibility rules: to receive SNAP, recipients must demonstrate need.

The ABAWD time limit does not specifically aim to increase earnings. However, engaging adults in employment and training programs—thereby upskilling and creating paths to self-sufficiency—has been a focus of the SNAP program for several decades (FNS, 2018). The purpose of employment

⁵ The quasi-experimental analyses showed the policy had a substantially small, *negative* impact on employment (less than one-half a percentage point decrease). This finding is consistent with the findings from the multi-state ABAWD time limit study completed by the Urban Institute (Wheaton et al, 2021).

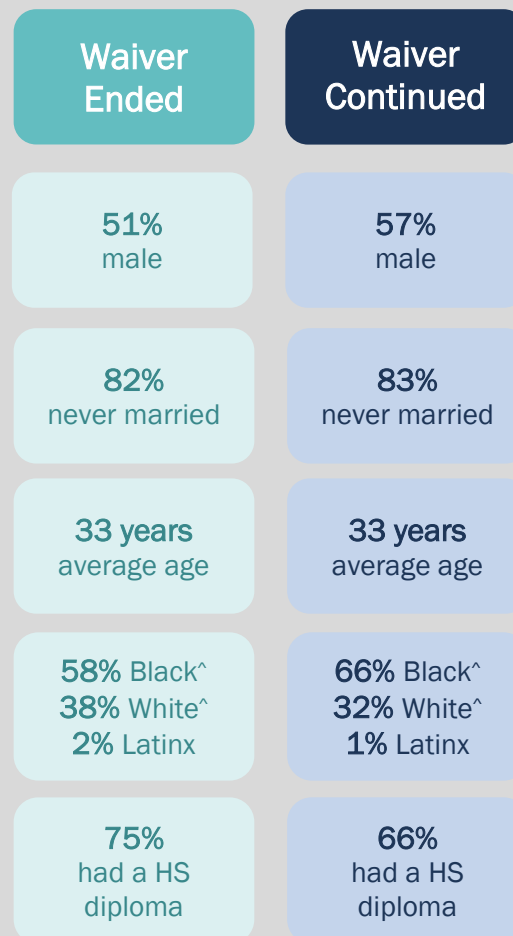
and training programs is to help participants secure employment opportunities that ideally lead to higher earnings (FNS, n.d.).

Figure 3 shows the median quarterly earnings for employed ABAWDs segmented by time limit waiver status. In the quarter of SNAP receipt, ABAWDs in the jurisdictions where time limit waivers ended earned a median of \$3,404 while ABAWDs in jurisdictions where time limit waivers continued earned a median of \$3,205. Over time, earnings increased for both the waiver ended and waiver continued groups. In the fourth quarter after SNAP receipt, median quarterly earnings grew by more than \$1,000 for both the waiver ended (\$4,790) and waiver continued (\$4,434) groups. Between the quarter of SNAP receipt and the eighth quarter after observation, median quarterly earnings increased by 61% for the waiver ended group (\$3,404 to \$5,478) and by 58% for the waiver continued group (\$3,205 to \$5,072).

Overall, Figure 3 does not offer any evidence that the end of the ABAWD time limit waiver increased earnings. It also demonstrates the importance of a comparison group. In the absence of a comparison group, it could appear as though the policy expiration led to an increase in earnings. However, as Figure 3 shows, earnings increased during this time period for all ABAWDs, not only ABAWDs in jurisdictions in which waivers ended.

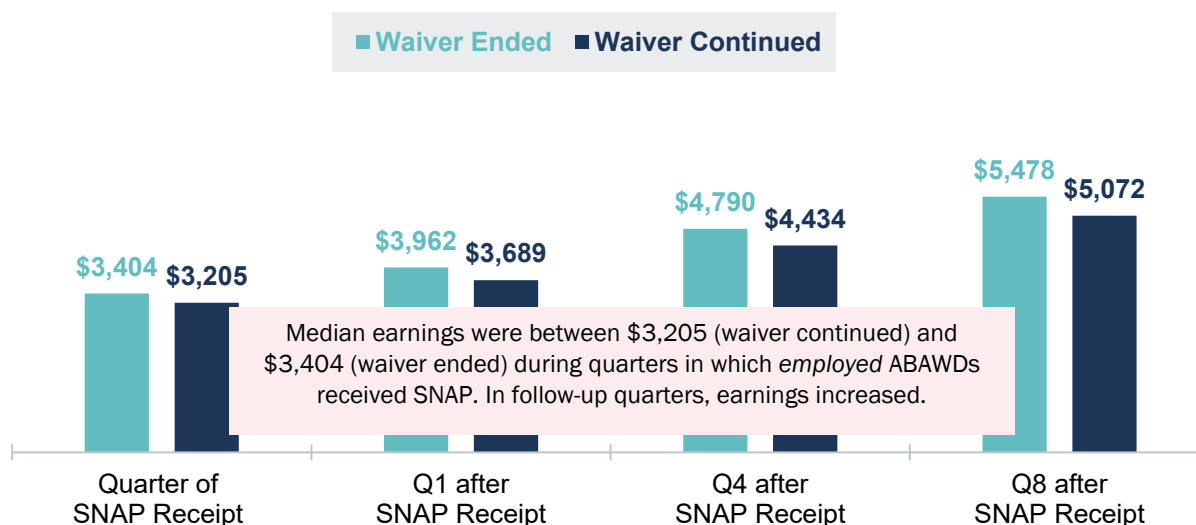
DEMOGRAPHICS

ABAWDs who lived in jurisdictions where the three-month time limit waiver ended were similar to ABAWDs who lived in jurisdictions where the waiver continued. However, ABAWDs in jurisdictions with waiver expirations were less likely to identify as male (51% vs. 57%) or Black (58% vs. 66%), and a larger percentage had a high school diploma (75% vs. 66%).



Note: [^]Non-Latinx. Race/ethnicity categories are shown for the three categories with the highest percentages. General Education Development Program (GED) certificates are included in high school completion rates. Valid percentages reported.

Figure 3. Median Quarterly Earnings in Quarters ABAWDs were Employed



Note: This figure estimates the median earnings for only the observations in which an ABAWD had earnings captured in the administrative data system. Observations represent each quarter of SNAP receipt by an ABAWD between 2015 and 2017; in other words, one quarter of receipt by one ABAWD is one observation. Some ABAWDs had more than one quarter of receipt and therefore, more than one observation. Results were not substantially different in robustness checks with only one observation per ABAWD. Earnings are standardized to 2021 dollars.

SNAP Participation

By design, the additional work requirement for ABAWDs (i.e., the time limit) leads to declines in participation in the program. Specifically, these policies are associated with high rates of SNAP exits, reductions in SNAP caseloads, and reductions in benefits issued (Brantley et al., 2020; Gray et al., 2021; Harris, 2021; Ku et al., 2019; Ribar et al., 2010). In fact, declines in participation can be as high as 20% or 30% (Ribar et al., 2010; Waxman & Joo, 2019).

Figures 4 and 5 demonstrate the impact of the reinstated time limit on ABAWDs' SNAP participation in Maryland. As shown in Figure 4, both the waiver ended (treatment) and the waiver continued (control) groups experienced declines in participation. In the quarter after observation, 71% of ABAWDs in the waiver ended group were still participating in SNAP, compared to 84% of

After controlling for the unemployment rate, jurisdiction, and individual characteristics, results show that the **EXPIRATION OF THE TIME LIMIT WAIVER** in 11 Maryland jurisdictions throughout 2016 resulted in a statistically significant **DECREASE IN ABAWDs' SNAP PARTICIPATION** in the first, fourth, and eighth quarters after SNAP receipt.

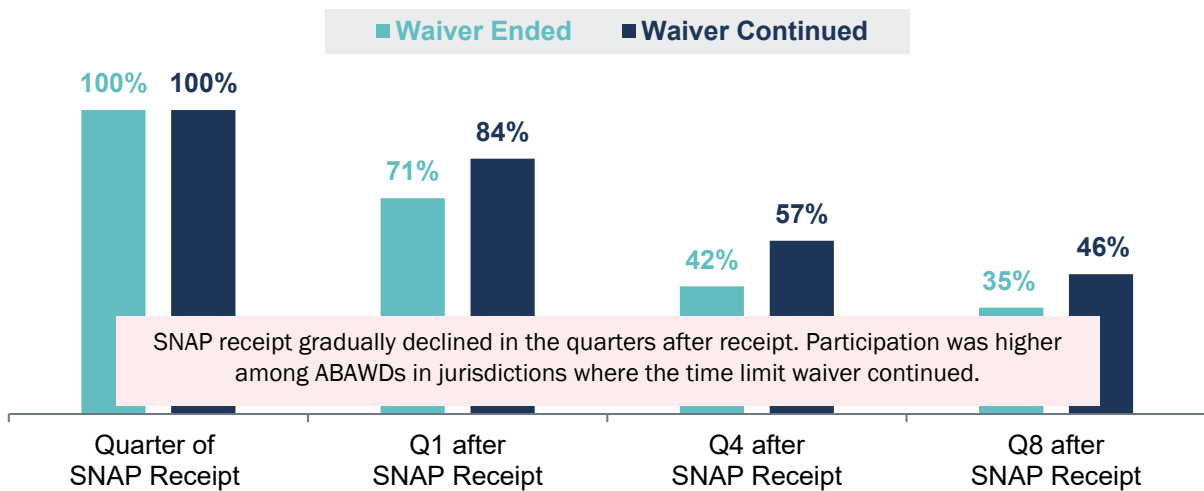
ABAWDS in the waiver continued group. By the fourth quarter (one year) after observation, SNAP participation declined to 42% for the waiver ended group and 57% for the waiver continued group. Finally, in the eighth quarter (two years) after observation, only one third (35%) of the waiver ended group was still participating in SNAP, compared to nearly half (46%) of the waiver continued group. Over the course of

the eight quarters of follow-up, the waiver ended group experienced a 65 percentage point decrease in SNAP participation and the waiver continued group experienced a 54 percentage point decrease.

Similar to the employment analyses, this study also used quasi-experimental methods to test the impact of the waiver

expiration on SNAP participation. The additional analyses provide further evidence that the time limit waiver expiration led to a decrease in SNAP participation among ABAWDs. These findings are consistent with the previously cited research that found these policies cause decreases in participation even after controlling for other factors.

Figure 4. Percentage of ABAWD Observations Participating in SNAP



Note: One *quarter* of receipt by one ABAWD is one observation. Observations represent each quarter of SNAP receipt by an ABAWD between 2015 and 2017. Each observation is examined in the quarter of SNAP receipt and the quarters after SNAP receipt. Some ABAWDs had more than one quarter of receipt and therefore, more than one observation.

Figure 5 provides an alternative view of the same story. This figure does not include the same observations of SNAP receipt for ABAWDs segmented by waiver ended and waiver continued groups. Rather, this figure examines *all adult recipients* in the SNAP program each calendar year between 2015 and 2019. Figure 5 also divides adult recipients by ABAWDs and non-ABAWDs in each calendar year.

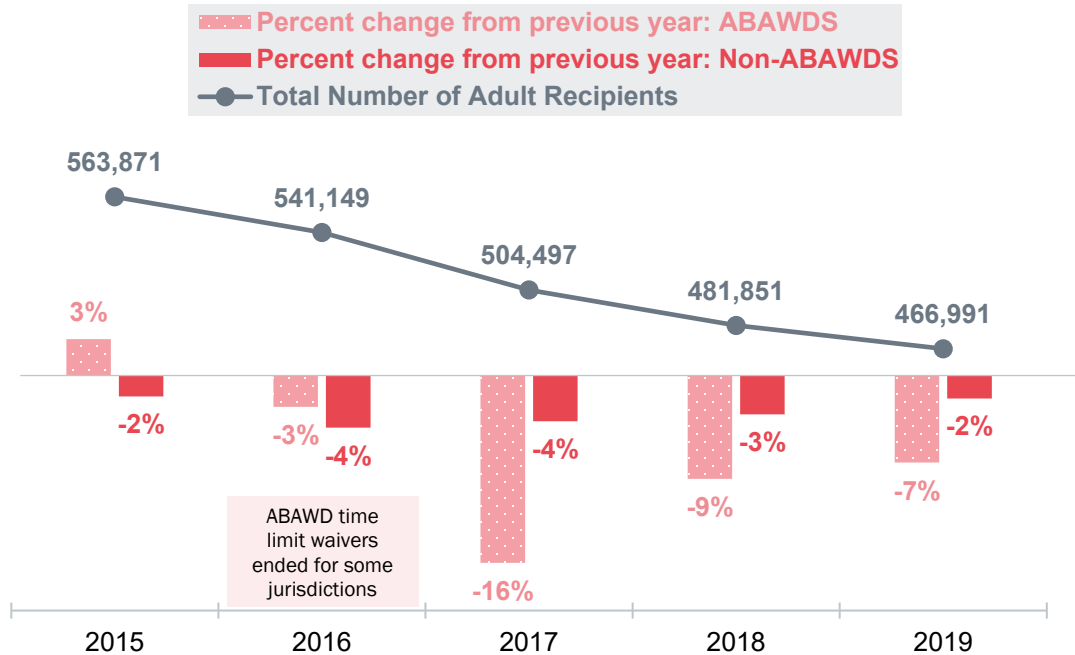
Figure 5 shows that the SNAP caseload decreased between 2015 and 2019. Overall, there was a 17% decrease in adult recipients during this time period (563,871

to 466,991). In the absence of any policy or other changes, it may be reasonable to assume the decrease in participation would equally affect ABAWDs and other types of adult recipients (e.g., adult recipients with children, older adults). Figure 5 shows, however, that ABAWDs experienced a larger decrease in the years following the time limit waiver expiration. During 2016—the year in which the policy change occurred—there was a 3% decrease in the number of ABAWDs on the SNAP caseload and a 4% decrease in the number of non-ABAWDs. Following 2016, the percentage of ABAWDs on the SNAP caseload

decreased at a much faster rate compared to non-ABAWDs. In 2017, the percentage of ABAWDs decreased by 16%, while the percentage of non-ABAWDs decreased by only 4%. This trend continued throughout the next couple of years. In 2018 and 2019, the percentage of ABAWDs on the caseload decreased by 9% and 7%, respectively, compared to decreases of only 3% and 2% for non-ABAWDs.

The combined findings of Figures 4 and 5 are consistent with one other recent study that examined the impact of the time limit waiver expiration on SNAP participation in Maryland. Wheaton and colleagues (2021) found that in the first 12 months after Maryland’s time limit policy was reinstated, ABAWDs received an average of \$357 less in SNAP benefits compared to similar participants. The same study found about one third of ABAWDs left in the first few months following the policy change.

Figure 5. Changes in Receipt among All Adult SNAP Recipients, 2015 to 2019



Note: This figure includes *all adults who were recipients in a SNAP household in each calendar year*. This figure does not use the previously defined waiver continued and waiver ended observations. ABAWD status can change from month to month. If a recipient was coded as an ABAWD in the administrative data *at any point* in a calendar year, they were included in the ABAWD calculations.

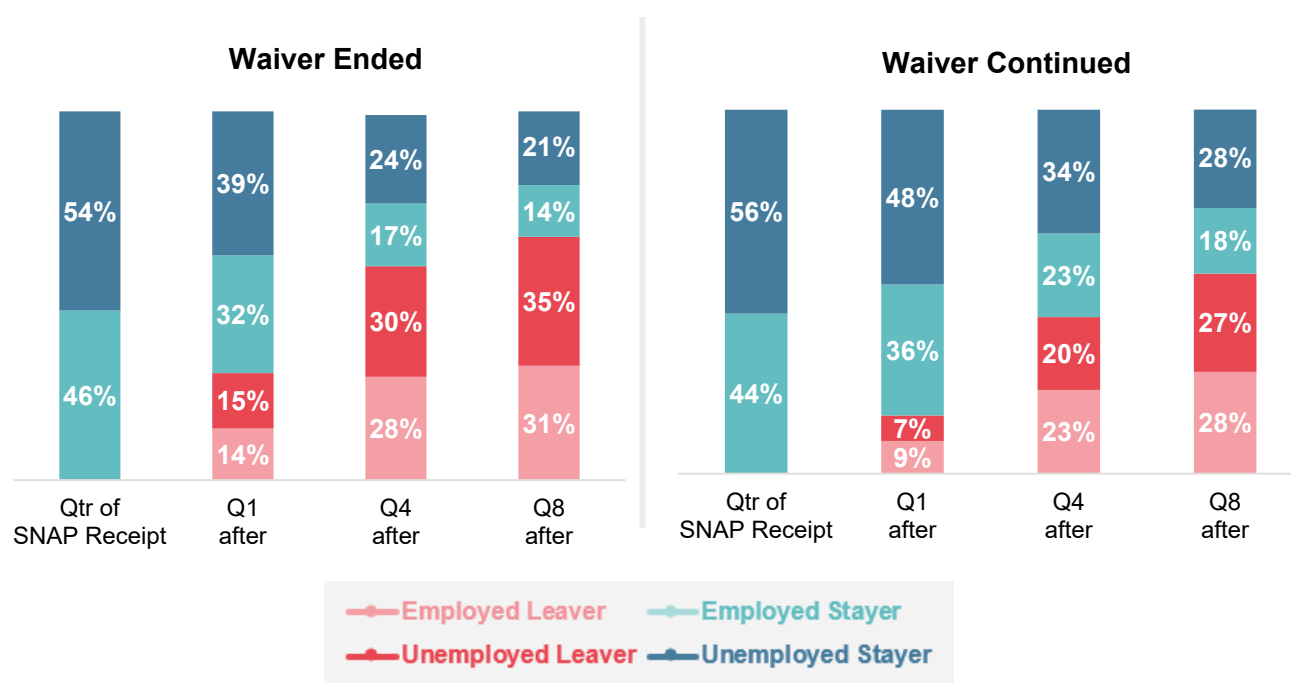
Employment & SNAP Combined Outcomes

The final analysis in this study unites previous analyses to demonstrate the combined outcomes of the ABAWD time limit waiver expiration. The first four bars of Figure 6 combine the employment and SNAP outcomes shown thus far for ABAWD observations (referred to as *ABAWDs*) in the waiver continued group. The second set of four bars show the employment and SNAP outcomes for ABAWDs in the waiver ended group. At each point in time, an ABAWD was sorted into one of four mutually exclusive categories: (a) employed leaver (i.e., left SNAP), (b) unemployed leaver, (c) employed stayer (i.e., received SNAP), (d) unemployed stayer.

As shown in Figure 6, the two groups of ABAWDs (waiver ended and waiver continued) followed similar patterns of receipt. In the follow-up quarters, the percentage of employed and unemployed stayers decreased as the percentage of employed and unemployed leavers increased. This is visually depicted in Figure 6: the blue bars get smaller over time and the pink and red bars get larger over time.

Although ABAWDs in both the waiver ended and waiver continued groups experienced decreases in receipt, the waiver ended group had a higher percentage of leavers in each follow-up quarter regardless of employment status. By the eighth follow-up quarter, 66% of the waiver ended group left SNAP: 31% were employed and 35% were unemployed. Conversely, by the eighth quarter after SNAP receipt, 55% of the waiver continued group left SNAP: 28% were employed and 27% were unemployed. These results are consistent with findings from South Carolina, where time limit policies were associated with high rates of exits for ABAWDs both with and without earnings (Ribar et al., 2010). In sum, Figure 6 reinforces previous findings in this study by showing collectively that the policy change in 2016 led to more rapid decreases in SNAP participation for ABAWDs in jurisdictions in which the waiver ended. However, the policy change had no impact on employment.

Figure 6. Employment and SNAP Combined Outcomes***



Note: One *quarter* of receipt by one ABAWD is one observation. Observations represent each quarter of SNAP receipt by an ABAWD between 2015 and 2017. Each observation is examined in the quarter of SNAP receipt and the quarters after SNAP receipt. Some ABAWDs had more than one quarter of receipt and therefore, more than one observation. Categories are mutually exclusive. * $p < .05$, ** $p < .01$, *** $p < .001$

CONCLUSIONS

Since 1971, able-bodied adults without dependents (ABAWDs) participating in the Supplemental Nutrition Assistance Program (SNAP) have been subject to work requirements as a condition of benefit receipt (Food Stamp Act Amendment of 1970). For nearly three decades, the federal government has also limited ABAWDs' participation to three months if they do not work or engage in employment-related activities (PRWORA, 1996). These requirements are rooted in neoclassical economic theories of labor supply and incentive effects which suggest that entitlement benefits can decrease individuals' willingness to work (Moffit, 2002). Consequently, they are built into

social welfare policies to counter theoretical employment disincentives.

In recent years, this economic framework has been challenged. A wealth of research employing a multitude of quasi-experimental methods across the country clearly demonstrates that work requirements do not improve nor discourage employment among ABAWDs, despite what economic theory predicts (Ritter, 2018; Gray et al., 2021; Han, 2022; Feng, 2021; Wheaton et al., 2021). The results of this study add to that ever-growing body of research.

Capitalizing on a policy shift that occurred in 2016, this study tested the effects of the ABAWD time limit waiver on employment, earnings, and SNAP receipt in Maryland by examining 911,591 quarters of SNAP

receipt by ABAWDs between 2015 and 2017. Theoretically, the transition from *no work requirements* to *work requirements* in an entitlement program such as SNAP should lead to a higher rate of employment among recipients with work requirements. However, this study found no evidence of this in Maryland.

Although the evidence largely concludes that SNAP work requirements do not positively impact employment, it also shows that these policies negatively impact participation in SNAP. The work requirements lead to high rates of exits from the program as well as reductions in participation and benefits issued (Brantley et al., 2020; Ribar et al., 2010; Ku et al., 2019; Gray et al., 2021; Waxman & Joo, 2019; Harris, 2021; Wheaton et al., 2021). The results from this study supplement these findings and show that the time limit reinstatement in Maryland led to substantial declines in SNAP participation among both employed and unemployed ABAWDs. However, it is important to note that SNAP is largely governed by federal-level rules and regulations; consequently, Maryland is still required to comply with all federal ABAWD rules even in light of these findings.

Reducing or taking away critical benefits designed to provide food security and sufficiency is particularly concerning given that SNAP recipients—including ABAWDs—are economically disadvantaged. Most ABAWDs subject to the time limit earn less than 50% of federal poverty guidelines (Wheaton et al., 2021). In Maryland specifically, the typical employed ABAWD earns less than \$14,000 annually prior to participating in SNAP, and maintains low earnings while receiving benefits (Hall, 2022). Moreover, one in six Maryland

ABAWDs are homeless (Wheaton et al., 2021), which presents its own host of challenges to securing stable employment. These policies also increase the incidence of physical health challenges (Feng, 2021) while disproportionately affecting adults with disabilities, Black adults (Brantley et al., 2020), and adults without a high school diploma (Harris, 2021).

Moving forward, it is important to think carefully about the implications from this study and complementary research. In theory, work requirements can be used as a tool to induce employment. In practice, however, they do not induce employment among ABAWDs receiving SNAP. In addition to not producing intended outcomes, these policies put already-vulnerable individuals at a greater disadvantage by reducing vital food assistance benefits or failing to provide assistance altogether (Han, 2022).

Over the next year, federal policymakers will conduct hearings and review expert testimony as they draft the 2023 Farm Bill, which will regulate SNAP. This process will provide legislators and stakeholders the opportunity to review evidence that has accumulated since the creation of the last Farm Bill in December 2018. One of the challenging matters facing policymakers over the next year is how to best utilize recent quasi-experimental evidence to inform policy. Do the theoretical benefits of the ABAWD time limit outweigh the practical consequences of limiting food assistance for potentially millions (Cronquist, 2021) of disadvantaged households?

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