

PATHWAYS, NOT PUNISHMENT

A Roadmap for SNAP Employment and Training in Illinois



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Executive Summary

The Supplemental Nutrition Assistance Program (SNAP, formerly known as food stamps) helps 1.9 million Illinoisans afford food. SNAP is a critical anti-hunger program with multiple benefits. It supports low-wage workers, underemployed people, and job seekers. It also benefits vulnerable people who may be unable to work, such as children, elderly people, and people with disabilities.

Federal law requires some SNAP recipients - specifically able-bodied adults without dependents, known as "ABAWDs" - to either work or participate in "employment and training" services for an average of 20 hours per week in order to retain food assistance for more than three months in any three-year period. The stated goal of this provision is meant to encourage people to achieve "self-sufficiency" and reduce reliance on SNAP benefits. However, meeting the work requirement is extremely burdensome for many SNAP recipients. People in the ABAWD population disproportionately face barriers to employment that greatly hinder their ability to find consistent, well-paid employment.

The federal government acknowledges these persistent employment challenges for SNAP recipients. In fact, there are two specific policies to accommodate for them: the SNAP Employment and Training (E&T) Program and a "time-limit waiver," which allows states to waive ABAWD work requirements in areas with higher-than-average unemployment or with insufficient job opportunities.

SNAP E&T is a program and a funding source designed to help states provide employment services for eligible SNAP recipients to gain skills, training, and/or work experience. However, in Illinois, the SNAP E&T program serves very few people due to limited resources, administrative inefficiency, and lack of coordination with the state's broader workforce development infrastructure. This policy report primarily serves to lay out a roadmap for changes that could improve SNAP E&T to better meet its goal of helping SNAP recipients find employment and achieve self-sufficiency through a variety of workforce and job placement services. In addition, a skills-based SNAP E&T strategy would then also contribute to the state's goals for building a diverse, skilled workforce that expands economic prosperity in Illinois.

Improving Illinois's SNAP E&T program recently became even more urgent due to the current federal administration's extremely harmful proposed changes to the second protective policy mentioned above - the "time-limit waiver." In December 2018, the Trump administration announced its intent to severely limit states' ability to qualify for a time limit waiver. This is especially troubling for Illinois. Based on its lackluster employment statistics, Illinois has requested and received this waiver for 101 of its 102 counties every year for over 20 years. However, the current federal administration has proposed changes to federal administrative rules that would severely limit a state's ability to qualify for this

waiver. Under the new proposed regulation, only four Illinois counties would likely qualify. As many as 415,000 Illinoisans¹ who receive SNAP could be newly subject to work requirements as soon as October 2019 - meaning they must find jobs or participate in services (both of which may not be available), report to IDHS, or lose their SNAP benefits and risk going hungry.

SNAP E&T has the potential to not only help people meet work requirements, but to support economic mobility, thus reducing families' need for SNAP by increasing their employment and income. It can also assist the 43% of SNAP recipients who belong to working families to obtain training, education, and support to find better quality jobs that put them on career pathways. However, studies have shown that in order to help move people out of poverty, SNAP E&T programs must focus on building skills and overcoming employment barriers through proven, quality workforce strategies.

The State of Illinois operates a \$34 million SNAP E&T program that provides job preparation and placement services for an average of approximately 3,200 monthly participants.² Although similar services are delivered through Illinois' WIOA-funded workforce development system, there is very limited alignment of SNAP E&T with the rest of the workforce system. Illinois' SNAP E&T program also fails to follow many nationally-recognized best-practices in SNAP E&T administration and workforce development programming. Current SNAP E&T regulations in Illinois, including selective enforcement of "mandatory" SNAP E&T participation, create additional risks of people facing sanctions, whereby they lose their benefits due to unnecessarily harsh and resource-intensive administrative oversight. The combination of these challenges leads to inefficiency and inconsistency in the provision of workforce services to SNAP recipients.

Policy Recommendations

Given the already dire economic circumstances of SNAP recipients in Illinois, improving the SNAP E&T program is pressing and long overdue. However, with devastating changes to the time-limit waiver on the horizon, the stakes are now higher than ever. Immediate action is necessary to prevent the hunger of hundreds of thousands of Illinoisans. To maximize resources and improve outcomes for job-seeking SNAP recipients, we recommend that Illinois:

¹ According to the FY2019 SNAP E&T State Plan, this is the estimated number of ABAWDs in the State of Illinois in the fiscal year. This is an increase over the previous year, where the number was listed as 346,000.

² FY2019 SNAP E&T State Plan.

Policy Recommendations (continued)

- 1. Undertake a comprehensive planning process, including a range of stakeholders across human services and workforce development, to create a skills-based SNAP E&T program integrated with the state's existing career pathways framework;**
- 2. Transition to a fully voluntary SNAP E&T program statewide; and**
- 3. Increase federally-matched state investments in SNAP E&T to expand the program's availability and accessibility to SNAP recipients in Illinois.**

Reference: Important Terms

Work Registration:

Federal law requires certain SNAP participants to either work or participate in “employment and training” services for a minimum of 80 hours per month in order to continuously receive SNAP. Those who do not meet federal exemptions (see “Federal Exemptions” list below) must be “registered” for work in their state during their intake assessment. If individuals who are designated work registrants do not work or prove participation in a qualifying employment and training program, or do not have “good cause” as to why they did not complete the required 80 hours per month, the individual can lose SNAP benefits and be subject to a “time limit” (as defined below).

Exemptions:

Most SNAP participants are exempt from work requirements due to age, disability, parenting responsibilities, receipt of unemployment compensation, participation in a rehabilitation program, enrollment of at least half time in a recognized program, or because they are already working. In addition to the exemptions from work registration listed in federal law, states may use additional exemptions from E&T participation, which they must include in the statewide SNAP E&T plan submitted yearly to the United States Department of Agriculture (USDA)³.

Federal exemptions:

In order to be exempt from work requirements or “work registration”, to receive SNAP benefits, individuals that would otherwise be subject to work requirements must meet at least one of the federally defined exemptions⁴:

- A person younger than 16 years of age or a person 60 years of age or older.
- A person physically or mentally unfit for employment. A State agency will define physical and mental fitness; establish procedures for verifying; and will verify claimed physical or mental unfitness when necessary.
- A person subject to and complying with any work requirement under title IV of the Social Security Act.
- A parent or other household member responsible for the care of a dependent child under 6 or an incapacitated person.
- A person receiving unemployment compensation.
- A regular participant in a drug addiction or alcoholic treatment and rehabilitation program.
- An employed or self-employed person working a minimum of 30 hours weekly or earning weekly wages at least equal to the Federal minimum wage multiplied by 30 hours. This includes migrant and seasonal farm workers under contract or similar agreement with an employer or crew chief to begin employment within 30 days.
- (viii) A student enrolled at least half-time in any recognized school, training program, or institution of higher education.

State Exemptions in Illinois:

State agencies are responsible for determining if an individual meets any exemptions and if work requirements are appropriate. If an individual does not meet any federally defined exemptions, the

³ Work Provisions, 7 CFR § 273.7 (2017).

⁴ Ibid.

individual is subsequently “registered” for work requirements by local DHS office caseworkers. States have the ability to define additional exemptions that may allow an individual to be exempted from participation in SNAP E&T. Illinois has slightly broader exemptions from SNAP E&T than federal law.

The Illinois Department of Human Services⁵ lists the following as exemptions from SNAP E&T participation:

- A person under age 18 or are age 50 or older;
- A student, enrolled at least half-time;
- A person participating in a drug addiction or alcohol treatment and rehabilitation program;
- A person receiving Unemployment Insurance;
- A person responsible for the care of an incapacitated person;
- A person who is pregnant or physically or mentally unable to work;
- A person residing in a SNAP household and the household includes at least one child under age 18;
- A person employed or self-employed, working at least 30 hours per week or receiving weekly wages of 30 times the federal minimum wage.
- A person living in an exempt area where SNAP E&T provider slots are not available for active participation.

Able-Bodied Adult Without Dependents (ABAWD) Time Limit:

People between ages 18-49, who have no dependents, and do not have a disability, and are not exempt from work requirements are known as “able-bodied adults without dependents,” or ABAWDs.

If an ABAWD lives in a place that is subject to a time limit and fails to prove that they are either working or participating in services for an average of 20 hours per week, they will be subject to a time-limit, meaning they can only receive SNAP for 3 months out of every 36 months.

ABAWD Time Limit & Waiver:

States can request for certain parts of their geography to be exempt from the ABAWD time limit if they meet certain criteria. In exempted areas, ABAWDs are not subject to work requirements. Many states qualify for waivers based on the criteria that certain areas within the state have 24-month average unemployment rates that are 20% higher than the national average.

A current federal proposed rule change would make several changes to the ABAWD waiver. Most notably, it would require that unemployment be *at least 7%* in order for an area to qualify.

Employment & Training (E&T) Services:

SNAP work registrants can meet work requirements or mandatory E&T participation requirements through any of the following activities:

- Unsubsidized or subsidized employment;

⁵ Illinois Department of Human Services, (2018). *SNAP Employment and Training Program* (IDHS 4538). Retrieved from: <https://www.dhs.state.il.us/page.aspx?item=32292>

- “Earnfare,”⁶
- Supervised job search;
- Job readiness training;
- Job retention services;
- Basic education;
- Vocational training;
- Apprenticeship;
- “Community work,” or volunteer work.

Federal law requires the department that administers SNAP (IDHS in Illinois) to coordinate with the state’s workforce development system to provide each of these components, “unless the component is not available locally through such a system”.⁷

Mandatory vs. Voluntary SNAP (E&T):

Separate from work requirements, states can elect whether to mandate participation in SNAP E&T programs for ABAWDs who are not working. Under a mandatory SNAP E&T program, any work registrant must comply with an “employment plan” created by IDHS. Failure to do so can result in sanctions, meaning the SNAP participant loses access to food benefits for a certain number of months. In Illinois, a participant loses SNAP eligibility for 3 months for each of the first two “violations.” A third violation can lead to loss of SNAP for 6 months.⁸ In a voluntary program, SNAP participants can elect to seek E&T services, but are not punished if they choose not to. Illinois has a mixed E&T program, where some counties are voluntary and others are mandatory.

⁶ Earnfare is defined as an on-the-job component where a participant is placed with an employer and can “work off” their monthly benefits, meaning that their pay goes toward paying DHS back for their food stamp allowance. Once the participant works enough hours multiplied by the minimum wage to equal their monthly benefit amount, they can earn up to \$294 monthly for additional hours worked up to a maximum of 80 hours per month.FY2019 Illinois State SNAP E&T Plan.

⁷ Work Provisions, 7 CFR § 273.7 (2017).

⁸ State of Illinois SNAP E&T Plan FY2018.

Background: SNAP E&T in Illinois

Generally speaking, current federal law requires SNAP recipients to work, participate in “workfare⁹” or receive employment-related services in order to continuously receive benefits.¹⁰ In reality, most SNAP participants are exempt from work requirements because of their age or disability, or because they are already working. (In Illinois, 48% of people who receive SNAP belong to working families.¹¹) Those who are not exempt - the able-bodied adults without dependents, or ABAWDs - must “register” with their local SNAP office and prove that they are either working 20 hours or more per week, or participating in qualifying educational and training programs to continue receiving SNAP (otherwise the “time limit” of 3 months every 36 months kicks in).¹² Illinois, like all states, receives federal funding to administer a SNAP E&T program to help its SNAP recipients meet work requirements and achieve “self-sufficiency.”

Federal and state resources support SNAP E&T.

SNAP E&T is financed through both federal and state funding. Each year, Illinois receives a grant to support the administration of SNAP E&T. Commonly referred to as “100% funds” the state received just over \$5 million of these funds in FY2018.¹³ Additionally, the federal government offers dollar-for-dollar matching of additional non-federal expenditures for SNAP E&T. This matched funding, known as “50-50” funds, is much more flexible than 100% grant funds.¹⁴ 50-50 funds may go towards education and training costs as well as reimbursements to help participants overcome transportation, childcare, and other barriers.¹⁵ In FY2018, Illinois spent \$13.8 million of eligible state funds on SNAP E&T, which was matched by the federal government. SNAP E&T programmatic services are generally provided by community-based organizations with state contracts. The State distributed around \$5.3 million of those state funds to 68 community-based providers of SNAP E&T

⁹ Workfare refers to the spectrum of work or job training requirements that are ascribed to a public benefit program, such as SNAP, in return for receiving benefits.

¹⁰ For a full list of activities that count toward work registration, see the sidebar on page 7.

¹¹ United States Department of Agriculture (USDA), Food and Nutrition Service (FNS) (January 2018). *Profile of SNAP Households (All Congressional Districts)*. Retrieved from: <https://www.fns.usda.gov/ops/snap-community-characteristics-illinois>

¹² Per IDHS, “Program activities” include short-term training and work assignments as well as GED, resume-writing and interviewing classes.

Illinois Department of Human Services, (2018). *SNAP Employment and Training Program* (IDHS 4538). Retrieved from: <https://www.dhs.state.il.us/page.aspx?item=32292>

¹³ The amount of 100% funds each state receives is based on a federally-determined formula and are sometimes referred to as “formula funds.”

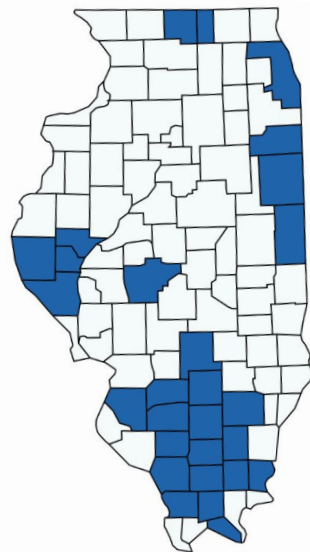
¹⁴ In 2017, Illinois launched an initiative called “SNAP to Success” to leverage eligible 50-50 funds at community organizations in order to expand SNAP E&T. While still small, the initiative has built partnerships with 3 community-based workforce providers to obtain matching for non-federal funds that they dedicate to serving SNAP recipients.

¹⁵ United States Department of Agriculture (USDA), Food and Nutrition Service (FNS), (2019). “*What Is SNAP E&T?*”. Retrieved from: <https://snaptoskills.fns.usda.gov/about-snap-skills/what-is-snap-et>

services.¹⁶ Although the federally-required state SNAP E&T plan requires a description of expenses and services provided, it is unclear in the current plan how the remaining \$28 million is allocated between program administration, compliance monitoring, and services provided by IDHS staff. The 2018 reauthorization of the Farm Bill included an additional \$13.9 million in federal funding for SNAP E&T, which could lead to a marginal increase in 100% grant funds to Illinois.

Illinois runs a mandatory SNAP E&T program, which contradicts accepted best practices.

States have considerable discretion in how to operate their SNAP E&T programs - including deciding whether to make the program “mandatory” or “voluntary.” Under a mandatory program, participants can be “sanctioned” or subject to punitive periods without benefits if they fail to comply with E&T program requirements. Under a voluntary program, any SNAP recipient may seek out employment and training services, but no punishment exists for those who opt out.¹⁷ In law, Illinois has a mandatory SNAP E&T program. However, in practice, Illinois functionally has a *mixed* mandatory/voluntary program. The state mandates participation in counties where contracted E&T providers exist. In all, 29 Illinois counties require mandatory SNAP E&T participation while 72 allow voluntary participation.



¹⁶ State of Illinois SNAP E&T Plan FY2018.

¹⁷ Mandatory requirements are separate and in addition to existing work requirements. Even a work registrant in a voluntary county might still be subject to work requirements which mandate that they either work or participate in E&T. For example, imagine a person who is considered an “ABAWD” lives in a county where the time limit is enforced but SNAP E&T is voluntary. If that person did not participate in work nor E&T services, they would not be able to receive SNAP for more than 3 months every 36 months. However, they would not face *additional* 3 month sanction periods for not participating in SNAP E&T.

Illinois' is one of a minority of states that has a mandatory E&T program, a decision which runs counter to federal recommendations. The United States Department of Agriculture has designated a voluntary SNAP E&T program as a "best practice."¹⁸ Indeed, at least 32 states across the country have opted to have a voluntary SNAP E&T program because of the clear benefits.¹⁹ First, voluntary programs are more efficient, and reduce spending on administrative compliance. Second, voluntary programs allow States to dedicate their limited SNAP E&T resources towards workforce strategies that are proven to improve employment outcomes, like career pathways frameworks and skills training, rather than ineffective "low-touch" assistance, like job search and resume editing. Since 2010, 21 states have moved to statewide voluntary programs for these reasons.²⁰ In Recommendation 2, we outline additional reasons why the state should transition to a fully voluntary program.

Illinois' is is one of only four states that has a mandatory E&T program. Since 2010, 22 states have moved to statewide voluntary programs.

In theory, SNAP E&T programming is diverse and customizable.

What does it mean to participate in SNAP E&T? The answer varies based on the participant's needs, desires, and location within the state. SNAP work registrants are required to meet with staff in local IDHS offices to develop a customized E&T plan to support their employment goals. That plan should outline what kinds of activities they can/must participate in to meet compliance requirements, as well as outline what types of employment barriers they face that require financial assistance. The state outlines different components that can qualify as E&T participation. They include job search, job readiness activities, job retention services, basic education, vocational training, work experience, and "Earnfare".²¹ A person's customized plan may contain one or more of these components. Most often, an individual accesses the services to comply with the components through a referral to a community-based service provider, including those funded through SNAP E&T.

¹⁸ Kogan, Deborah, Anne Paprocki, and Hannah Diaz. Supplemental Nutrition Assistance Program (SNAP) Employment and Training (E&T) Best Practices Study: Final Report. Prepared by Social Policy Research Associates for the U.S. Department of Agriculture, Food and Nutrition Service, November 2016.

¹⁹ United States Government Accountability Office, "SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM: More Complete and Accurate Information Needed on Employment and Training Programs," November 2018.

²⁰ Ibid.

²¹ Both "work experience" and "Earnfare" offer a work placement for a SNAP recipient to "work off" their monthly benefit while creating a work history and creating potential employer references for future work.

It is worth noting that the state is requiring SNAP E&T clients to comply with a plan without a guarantee that the corresponding services will be available.

Incomplete data limits our understanding of SNAP E&T in Illinois.

Data regarding the number of people who participate in SNAP E&T services is very limited, and what exists is difficult to interpret. According to the state's SNAP E&T plan, Illinois had a projected average of 3,200 monthly E&T clients during fiscal year 2019, with as many as 9,400 unduplicated participants per year.²² However, we do not have access to data that shows how many people successfully complete E&T programs, or whether they experience improved employment outcomes. Even given the numbers we have, existing service levels only provide enough to serve a tiny fraction of the Illinois SNAP recipients that need employment support. In FY2019, IDHS estimated that there are around 414,000 ABAWDs in Illinois. Approximately 336,000 of them live in counties that are subject to mandatory E&T requirements. At this rate, fewer than 1% of people mandated to participate in SNAP E&T are receiving services in a given month.

As previously noted, federal law also contains a waiver of ABAWD time limits for areas that have higher than average unemployment, or where labor market data shows a lack of available jobs.

Fewer than 1% of people mandated to participate in SNAP E&T are receiving services in a given month.

As of 2018, all 101 out of 102 Illinois counties (all except DuPage County) were eligible to be waived of this time-limit requirement if they face certain economic challenges.²³ The State has consistently requested this waiver every year since 1997, allowing many people to keep their benefits past 3 months.

²² State of Illinois SNAP E&T Plan FY2018.

²³ According to the Food and Nutrition Service, states qualify for a waiver in all or part of a state is eligible for extended unemployment benefits, had a recent unemployment rate of over 10 percent, a recent 24-month average unemployment rate 20 percent above the national unemployment rate for that same 24-month period, or is designated as a Labor Surplus Area by the U.S. Department of Labor. States can request a waiver for the whole State or only part.

Hundreds of thousands of Illinoisans are at risk of losing SNAP benefits. One way Illinois can reduce this harm is by swiftly and ambitiously expanding and improving it's SNAP E&T program.

As of 2019, 97.5% of the ABAWDs in Illinois lived in areas exempted from work requirements because of the federal waiver (around 404,000 out of 414,000 people.) As mentioned, a proposed federal rule change could significantly limit the time-limit waiver as soon as October of 2019. Under the proposed rule, only four counties in Illinois would qualify for the waiver, all of which are small counties at the southern tip of the state.²⁴ That leaves over 400,000 ABAWDs who would be newly subject to work requirements and will immediately need to find work or enroll in workforce services in order to retain food benefits beyond three months.

The totality of this picture is grim: too many jobs in our economy pay low wages, are part time, and are unstable resulting in many working families relying on SNAP to make ends meet. SNAP recipients who struggle to find work may soon be subject to even more punitive work requirements that will jeopardize their food. There is a severe lack of workforce services compared to the number of people who need assistance. Lastly, existing SNAP E&T administration and services fail to follow best practices, resulting in unnecessary spending on costly and redundant administrative oversight instead of meaningful programmatic content. Put simply, hundreds of thousands of Illinoisans are at risk of losing SNAP benefits. One way Illinois can reduce this harm is by swiftly and ambitiously expanding and improving it's SNAP E&T program.

Recommendation 1: Undertake a comprehensive planning process to create an integrated, skills-based employment strategy for SNAP recipients.

Although the SNAP E&T Program is administered by the Illinois Department of Human Services (IDHS) – the same agency that administers SNAP benefits – there is no reason that IDHS should operate a workforce program separated from the rest of the state's workforce development system. As the state's SNAP agency, IDHS is responsible for developing the state's SNAP E&T plan and federal reporting, but has significant flexibility in program services and design. Most of the experience and expertise on workforce development in the state is housed at the Department of Commerce and Economic

²⁴ Based on current unemployment data, Alexander, Hardin, Johnson and Pulaski are the only Illinois counties that would qualify for the waiver under the current proposed criteria.

Opportunity (DCEO) that administers the federal Workforce Innovation and Opportunity Act (WIOA) program through its statewide network of local workforce areas.

Although both WIOA and the federal law governing SNAP encourage alignment between SNAP E&T and WIOA-funded workforce systems,²⁵ Illinois has yet to align the programs. With some limited exceptions, Illinois' SNAP E&T program operates separately from the WIOA-funded workforce system. With the major federal rule change expected that will overwhelm any existing SNAP E&T services and put food at risk for very vulnerable Illinoisans, increased collaboration between the state agencies is critical. It is necessary that DCEO be given a leadership role in the development of a strategy to greatly expand SNAP E&T services. In addition to its workforce expertise, DCEO managed the implementation of WIOA beginning in 2015. This process streamlined and coordinated programs with a goal of aligning all of Illinois' workforce and education programs into an integrated career pathways system. As such, DCEO's co-leadership could leverage each of those systems and partnerships to the benefit of SNAP participants. At a minimum, DCEO collaboration could unlock new 50-50 resources for SNAP E&T, improve outcome reporting, and curb the worst harms of the proposed federal rules.

Illinois should leverage its workforce system to benefit SNAP job seekers and expand available resources.

Ongoing, strategic collaboration and planning that connects SNAP E&T with local networks of workforce services would help the program in numerous ways. First, it would open new opportunities to seek federal matching dollars through the 50-50 funding stream. Through its "SNAP to Success" initiative, IDHS currently partners with a small number of community-based organizations that serve SNAP participants to claim their eligible expenditures for federal matching 50-50 funds, and in turn use the federal funds to offer more services.²⁶ While some of these partners also receive WIOA funding, IDHS does not collaborate with DCEO on the effort.

²⁵ The 2018 reauthorization of the Farm Bill included a general requirement that states intentionally operate SNAP E&T and WIOA programs in consultation with one another.

Kaleba, Kermit. (2018, December 11). "House, Senate leaders release Farm Bill Compromise; Rejects harsh work requirements and increases training funding." Retrieved from: <https://www.nationalskillscoalition.org/news/blog/house-senate-leaders-release-farm-bill-compromise-rejects-harsh-work-requirements-and-increases-training-funding>

²⁶ This means money spent by state and local governments, as well as non-federal grant or philanthropic funding, is eligible for federal dollar for dollar matching.

Given unlimited federally matched funding, the failure to work closely together at the agency level means that Illinois leaves resources on the table that it desperately needs for SNAP E&T.

Though federal WIOA funds are *not* eligible for matching, many workforce providers in DCEO's network also receive philanthropic or local government funding, but have no reason to track SNAP receipt among program participants. Co-leadership of an expansion effort would result in the alignment necessary to secure matched funds. Given that there is no limit on the amount of federal funds that can be matched, the failure to work closely together at the agency level means that Illinois leaves resources on the table that it desperately needs for SNAP E&T.

Second, federal requirements mandate that IDHS report data to the federal government about employment outcomes achieved by SNAP E&T participants.²⁷ In the State plan, IDHS indicates that it will coordinate with the state's Department of Employment Security to develop an outcome reporting strategy. However, many workforce organizations who receive WIOA funding through DCEO have to report similar outcome measures. DCEO is responsible for that state reporting. As such, DCEO is best positioned to work with IDHS to implement the federal reporting requirements and will bring insights from their network on how to successfully utilize data to capture and improve outcomes and how to best structure SNAP E&T services to achieve good outcomes with participants.

Co-leadership of a strategic planning process for SNAP E&T will position Illinois to respond more effectively to harmful federal policy proposals.

Finally, sharing SNAP E&T leadership will improve Illinois' ability to respond to new federal work requirements expected for SNAP and other public benefits programs.²⁸ Though the recent reauthorization of the Farm Bill rejected new work requirements for SNAP, the proposed rule change that would severely limit the ABAWD time-limit

²⁷ In the FY2018 SNAP E&T State plan, the Department lists the following data points as upcoming requirements: "The number and percentage of E&T participants and former participants in unsubsidized employment, their median quarterly earnings and how many completed each component (training, educational, work experience and on-the-job training.)"

²⁸ Additionally, the Department of Homeland Security is currently considering regulatory changes that would add SNAP to a list of benefits programs that designates participating immigrants as a "public charge," diminishing their ability to obtain legal permanent residency or citizenship.

waiver will be extremely challenging to implement. Based on the current proposal, as many as 400,000 Illinoisan ABAWDs could risk losing benefits as soon as October 2019. Providing more workforce services to SNAP participants is one of the few levers that Illinois has to dampen the impact of the time limit.

However, it is important to note that not every ABAWD is an ideal candidate for WIOA services. Many programs under WIOA require certain educational attainment (often at least a GED) that many ABAWDs do not have. In addressing the workforce service wants and needs of the ABAWD population, SNAP E&T must also build its own capacity to serve those most disconnected from work, and increase connections with the adult education and vocational training systems in Illinois to meet the diverse needs of those subject to work requirements. A unified, multi-agency strategic planning process for SNAP E&T will position Illinois to respond more effectively to meet the diverse employment needs of SNAP participants.

Notably, Illinois tested the waters of interagency collaboration as part of the pilot SNAP E&T program known by the acronym EPIC.²⁹ Co-led by DCEO and IDHS, the EPIC pilot was funded with time-limited federal funds and was intended to test new skills-based programming for SNAP recipients. Five thousand SNAP participants in 33 counties were included in the pilot study through which half of the participants were enrolled in skills training programs at community-based workforce providers. The other half received standard SNAP E&T services. While the EPIC program will not continue beyond 2018, it did expand services for SNAP recipients at community-based workforce organizations, and gleaned lessons that could serve as the starting point of a successful cross-agency planning process.

In order to expand the state's capacity to assist SNAP recipients in finding employment with family-sustaining wages, IDHS and DCEO should co-lead a strategic planning process to build and implement a skills-based employment strategy for SNAP recipients. In addition to including all relevant governmental partners, the state should include representatives with lived experience of participating in SNAP E&T, as well as advocates who work on human services, anti-hunger, and workforce development service provision and policy.

²⁹ EPIC is an acronym that stands for employment opportunities, personalized services, individualized training, and career planning.

Recommendation 2: Transition to a fully voluntary SNAP E&T program.

In order to maximize the use of existing and new E&T resources and achieve better employment outcomes, Illinois should transition its E&T program to be voluntary across the state.

- (1) Neither the SNAP E&T program nor the workforce system has capacity to serve all required job seekers in a mandatory program.

Despite low overall unemployment rates, jobs are not readily available to all job seekers in the state, particularly those who face barriers to employment (as is the case for many SNAP recipients.) But, Illinois’ existing employment and training infrastructure simply cannot accommodate all of the state’s job seekers who need help. The state’s WIOA system currently serves fewer than 15,000 people per year.³⁰ In fact, the system has shrunk in recent years, as federal WIOA funds have been cut over 40% over the past two decades.³¹ Per the 2017 Illinois State Plan for SNAP E&T, average projected monthly participants for SNAP E&T “slots” hovers at around 3,200 people in a given month. Between WIOA and SNAP E&T there are workforce services to reach only 5% of the estimated 336,000 mandatory E&T participants. Furthermore, if the proposed federal rule change is enacted, an estimated 412,000 people would be newly subject to work requirements, which could greatly increase the demand for already limited workforce services.

Current System Capacity	Current System Need	Projected w/ Fed Rule Change
WIOA: fewer than 15,000 slots + SNAP E&T: around 3,200 slots	Estimated mandatory E&T participants:	Estimated ABAWDs subject to work reqs as soon as Oct. 2019
Approx. 18, 200 slots	336,000 people	412,000 people

In the absence of sufficient workforce services, a mandatory program sets everyone up for failure: the state’s SNAP program, the workforce service providers, and job seekers who receive SNAP.

³⁰ Social Policy Research Associates. (2017, January 20). “PY 2015 WIASRD Data Book Illinois”. https://www.doleta.gov/performance/results/WIASRD/PY2015/PY%202015%20WIASRD%20STATE%20Data%20Book_IL.pdf

³¹ National Skills Coalition. (2018, August 23). “America’s Workforce: We Can’t Compete If We Cut”. Retrieved from: <https://www.nationalskillscoalition.org/resources/publications/file/Americas-workforce-We-cant-compete-if-we-cut.pdf>

(2) The administrative burden of a mandatory program siphons the majority of limited SNAP E&T resources away from workforce services.

A voluntary program both minimizes administrative waste and protects SNAP recipients from losing their benefits unnecessarily. The process of following up with “mandatory” SNAP E&T participants is complex, time-consuming, and subject to error. Furthermore, the stakes are high: SNAP participants that fail to comply with program requirements are subject to penalties that may ultimately result in permanent disqualification from E&T services, as well as loss of SNAP benefits. For example, if a “mandatory” SNAP E&T client fails to attend assigned program appointments, the administrative agency is required to follow up and determine if the non-compliance had “good cause,” issue a Notice of Adverse Action letter, and reschedule missed appointments with the client. As a result, the person may lose their ability to continue in the program *and* lose their SNAP benefits. In other words, if you miss a meeting or fail to submit a piece of paper, you may lose your food assistance.

Voluntary SNAP E&T programs require less administrative oversight and participant tracking. Many states are under the false assumption that ABAWD time limits require a mandatory SNAP E&T program in non-waivered areas of the state. That is not the case. In fact, the tracking required under a mandatory E&T program adds a redundant layer of oversight. Compliance activities required by mandatory programming, in addition to potentially barring participants from receiving needed services and benefits, use up valuable staff time and resources. In contrast, voluntary SNAP E&T programs allow participants that exit a program to return when they are ready to begin again. Staff focus their attention on helping people get employment rather than monitoring their compliance. Under a voluntary program, frontline staff don’t have to spend their valuable time determining if good cause elements exist, executing disqualifications, and completing related tracking and paperwork.

Yet again, the proposed federal changes further threaten IDHS’s administrative resources because eligibility workers will have to enforce the time limit for hundreds of thousands of clients on top of their existing responsibilities. Maintaining a mandatory E&T program in the absence of a time limit waiver in place creates redundant layers of punitive oversight, potentially subjecting non-compliant ABAWDs to sanctions in addition to time limits. Given the drastic shortage of available SNAP E&T and workforce services and the staffing demands of administering the ABAWD time limit, the state should make every effort to limit non-required monitoring and compliance

Maintaining a mandatory E&T program in the absence of a time limit waiver creates redundant layers of punitive oversight.

activities. A statewide voluntary program is a necessary way to do that.

(3) A voluntary program is a more attractive partnership opportunity for high-quality workforce service providers.

Workforce providers are in the business of matching job seekers with employers. High-quality providers focus on services and strategies that will result in retention and opportunities for advancement using a career pathways framework. These organizations successfully support business, economic growth, and individual self-sufficiency that prevents future need for public benefits. Furthermore, as noted above, the broader workforce system may be able to leverage resources that can be matched through federal “50-50” E&T funding, creating opportunities for needed service expansion. In order for Illinois to expand its SNAP E&T resources and improve available E&T services, it must increase partnerships with these workforce service providers.

However, workforce providers are *not* in the business of acting as an extension of public benefits programs that focus more on compliance than on outcomes. But in a mandatory program, providers are forced to do just that, diverting scarce resources towards excessive paperwork. Program restrictions add additional administrative burdens that act as a disincentive to partnering with the SNAP E&T program. In a mandatory program, frontline workforce staff must make decisions that can result in the individuals that they are trying to help going hungry.

On the other hand, a voluntary program would facilitate alignment with the best practices in the workforce field, including:

- *Individualized screenings and support:* Workforce service providers evaluate program participant needs and goals and decide whether their program is a good fit for the individual.
- *Participant-driven progress:* With voluntary participation, individuals are open to and expect assessment discussions, and program service plans can be formulated and targeted to individual needs and goals.
- *Harnessing self-motivation:* Determined, willing participants achieve better program completion rates and employment outcomes.

In a voluntary program, the job-seeking SNAP recipient’s experience is enhanced. SNAP recipients participate because they are motivated to find work. First, because their access to food is not contingent on their compliant participation, they may be more open to discuss their experiences, goals, and challenges with staff, and experience lower stress levels. Second, a voluntary program lessens the chance that there will be individuals in programs that don’t want to be there, and who may disrupt the learning environment. Under

a mandatory program, more unmotivated individuals may join programs, perform poorly, and absorb much of the time and energy of the staff. Lastly, if a voluntary program leads participants to have positive perceptions of the E&T program, they may be more likely to spread positive information about the program, which in turn helps with outreach efforts and produces more participation.

Programs that help individuals to harness their motivation and get quality employment services and skills training will lead to greater individual success and better program outcomes. Indeed, a literature review conducted on behalf of the United States Department of Agriculture's Food and Nutrition Service, the federal agency governing SNAP E&T, found evidence that voluntary SNAP E&T programs that utilize proven workforce development strategies are more likely to lead to improved job placement.³² The service providers in Illinois' workforce system already use many of the best practices identified by the USDA, and every effort should be made to facilitate collaboration and partnership between the WIOA-funded workforce system and IDHS. Running a voluntary program is one important factor that will aid that effort.

(4) Black Illinoisans are disproportionately concentrated in counties with mandatory E&T requirements, putting them at unequal risk of punitive sanctions.

State regulations currently require all non-exempt SNAP recipients to participate in E&T "to the extent resources are available."³³ In practice, the state designates E&T programs mandatory in counties where there is an existing SNAP E&T contract or other workforce program. However, this does not necessarily mean that there are sufficient services in any given county for all the people required to participate in SNAP E&T. Failure to meet SNAP E&T requirements can lead to sanctions, or months where a person does not receive benefits.

³² United States Department of Agriculture (USDA), Food and Nutrition Service (FNS), (2016). "Supplemental Assistance Program (SNAP) Employment and Training (E&T) Best Practices Study (Summary)." Retrieved from:

<https://fns-prod.azureedge.net/sites/default/files/ops/SNAPeandTBestPractices-Summary.pdf>

³³ Illinois General Assembly. "PART 121 SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM (SNAP) SECTION 121.160 PERSONS REQUIRED TO PARTICIPATE". Retrieved from: <ftp://www.ilga.gov/jcar/admincode/089/089001210H01600R.html>

Whether or not it is intended, this policy disproportionately affects Black Illinoisans, who are more likely to live in a county with a mandatory SNAP E&T program than white Illinoisans. 81% of Illinois' Black population lives in a county with a mandatory SNAP E&T program, compared with only 51% of the white population. If a county has an above-average percentage of Black residents, the odds are *twice* as high that the county will have a mandatory SNAP E&T program.³⁴ Black Illinoisans are already overrepresented among SNAP recipients - but this evidence suggests they may also face unfair risk of sanctions related to SNAP E&T.

81% of Illinois' Black population lives in a county with a mandatory SNAP E&T program, compared with only 51% of the white population.

Given the evidence, the State of Illinois should use its discretionary authority to transition to a voluntary SNAP E&T program. Doing so will ease the strain on administrative resources, facilitate meaningful collaboration with the traditional workforce system, and enhance the experiences and outcomes of job-seeking SNAP recipients.

Recommendation 3: Increase federally-matched state investments in SNAP E&T to expand the program's availability and accessibility.

Illinois is leaving federal funds for SNAP E&T behind.

Even before the prospect of the federal rule change to the ABAWD waiver loomed overhead, Illinois faced a shortage of workforce services compared to the needs of job seekers. Now the impending federal rule change increases the urgency to secure all available funds to advance a scaled, skills-based employment strategy for SNAP recipients. Any state or local dollars infused into SNAP E&T would be eligible for a federal match, thus doubling the fiscal impact of new state investments. These supplemental funds could go towards expanding the available slots of workforce services for Illinoisans newly subject to work requirements. As such, state policymakers should increase funding for SNAP E&T programming.

³⁴ Calculated using logistic regression model by Mari Castaldi, Director of Policy at the Chicago Jobs Council. Using a logistic regression to regress whether a county had a higher-than-average Black population on the probability that the county is mandatory (with no additional controls,) the odds ratio that a county is mandatory if the county had an above-average percentage of Black residents was 2.18 with 90% confidence.

In addition to programmatic expansion, the state should dedicate additional resources to increase the capacity of local IDHS offices to improve the screening process for exemptions for work requirements. IDHS should revisit its process for screening for exemptions to ensure that people who qualify exemptions that may be difficult to spot (such as mental illness or other invisible disabilities) are not unfairly punished. Increased capacity should include hiring additional staff, improving processes, and training existing staff.

Finally, the State should expand its *SNAP to Success* program to bring on additional partners and capture any potential matchable funds for SNAP E&T. In addition to seeking new non-profit service provider partners, IDHS should also develop a clear process for seeking federal matches to any investments made by municipal or county governments in workforce services for ABAWDs.

Conclusion

Illinois' high rates of food insecurity and unemployment cannot be solved by more stringent work requirements or inefficient mandatory regulations for SNAP E&T programs. Instead, the ultimate goal of SNAP E&T - to help participants achieve self sufficiency - will be best accomplished by expanding employment and training resources for SNAP recipients and removing unnecessary administrative processes that siphon resources from services to reduce barriers to success.

Illinois policymakers must respond decisively to build a skills-based employment strategy for job-seeking SNAP recipients and curb the impending harms of the proposed federal rule change. First, the state must tear down the silos that inhibit collaboration and coordination between IDHS, DCEO, and any other relevant state agency concerned with workforce development. Second, IDHS should pursue an administrative rule change to make Illinois a fully voluntary SNAP E&T program and eliminate unnecessary and punitive compliance sanctions. Finally, the state must invest new resources in SNAP E&T to expand programmatic accessibility and prevent hundreds of thousands of residents from going hungry.