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**Imposing a Time Limit on  
Food Stamp Receipt:  
Implementation of the  
Provisions and Effects on  
Food Stamp Program  
Participation**

**Volume I**

*Final Report*

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## EXECUTIVE SUMMARY

The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), which reformed the welfare system, also introduced fundamental changes to the way that Food Stamp Program (FSP) eligibility is determined for a segment of the population. PRWORA imposed a work requirement and time limit on those viewed as fit to work—able-bodied adults without dependents (ABAWDs). ABAWD participants are limited to three months of benefits in a three-year period unless they meet a work requirement.

The ABAWD provisions have fundamentally changed the FSP in three ways. One, this is the first instance that a time limit has been placed on food stamp receipt and that a major group of persons have been made ineligible because of factors other than their income and assets.<sup>1</sup> Two, the states were granted uncharacteristically broad latitude in implementing these provisions. Three, states are now required to track food stamp receipt, employment, and participation in other work activities over a period of 36 months, while previously eligibility depended for the most part on household circumstances in just one month.

The uniqueness of the ABAWD provisions has generated interest in the number and characteristics of participants affected by them. The flexibility under which states implemented the provisions has generated interest in states' policy choices and in how the recent issuance of final regulations on the ABAWD provisions will affect those choices. To address these issues, Mathematica Policy Research, Inc. (MPR) and its subcontractor Health Systems Research, Inc. (HSR) have conducted a study of the ABAWD provisions for the Food and Nutrition Service (FNS) of the U.S. Department of Agriculture (USDA). This report presents the study findings.

### THE ABAWD PROVISIONS

The time limit established by PRWORA does not apply to individuals who are:

- Under 18 or over 50 years of age
- Medically certified as physically or mentally unfit for employment
- Responsible for a dependent child
- Exempt from FSP work registration
- Pregnant

All other participants are considered ABAWDs.

The exclusion of participants who are exempt from work registration requires further explanation. Since the 1980s, the FSP has required certain adult participants to register for work.

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<sup>1</sup> PRWORA also made some resident aliens ineligible.

For consistency, PRWORA exempts from the ABAWD time limit all individuals who are exempt from work registration. The most significant exemptions from work registration are similar to the ABAWD exemptions. As a result, most participants who would be excluded because they are exempt from work registration are already excluded for another reason. Participants who are under 15 or over 60 years of age, physically or mentally unfit, or responsible for a dependent child under age 6 are exempt from both work registration and the ABAWD provisions. A smaller number of participants who might otherwise be identified as ABAWDs are exempt from work registration if they are complying with the work requirements for Social Security or Unemployment Compensation, responsible for the care of an incapacitated person, enrolled at least half time in a qualified educational institution or training program, participating in a drug addiction or alcohol treatment program, or working 30 hours a week or earning more than 30 times the minimum wage.

The time limit applies to ABAWDs unless they satisfy a work requirement. ABAWDs can meet the work requirement by (1) working at least 20 hours per week (2) participating in a workfare or comparable program, or (3) participating in another qualifying work activity for at least 20 hours per week. Months in which they meet the work requirement do not count against the three-month limit.

ABAWDs who exhaust their three months of benefits lose their eligibility to receive food stamps for the remainder of the 36-month period. They can regain eligibility during this time period by meeting the work requirement for 30 days, after which they remain eligible to receive food stamps for as long as they continue to meet the work requirement. If they fail to meet the work requirement a second time, they can receive food stamps for up to three additional months. These three months must be used consecutively. After that point and for the balance of the 36-month period, they can receive food stamps only in those months in which they meet the work requirement.

States have two options for exempting participants from the time limit. At the request of a state agency, USDA may waive the time limit and the associated work requirement for people who live in an area where the unemployment rate is over 10 percent or where there is an insufficient number of jobs. In addition, the Balanced Budget Act of 1997 (BBA) allows states to exempt up to 15 percent of the number of persons who are currently FSP-ineligible because of the ABAWD provisions.

## **SOURCES OF DATA**

A comprehensive study such as this one requires multiple data sources to adequately address all of the research questions. Most of the data for this study were provided by staff at state, county, and local FSP agencies. Other important data were obtained from FNS databases, but their primary source was the states.

**Number and Characteristics of ABAWDs.** Because of the flexibility that states had in defining ABAWDs, documenting the number and characteristics of ABAWD participants presents a considerable challenge. Ultimately, we require data in which the states have identified those participants whom they regard as ABAWDs. But state data systems differ not only in the degree to which they identify ABAWDs and document key characteristics but in the reliability

with which they do so. To estimate the number and characteristics of ABAWDs, we relied primarily on tabulations that we requested from the states. To validate and supplement these numbers, which were often incomplete, we obtained information from three additional sources: micro caseload data from five states, FSP Quality Control (FSPQC) sample data, and information reported by the states to FNS. We also conducted follow-up interviews with the states after reviewing their submissions.

**ABAWD Policies and Their Implementation.** We conducted five surveys to collect a broad range of information on state policy choices, their implementation, and their administration. These surveys are identified by their target populations: (1) state FSP directors and managers of local office operations, (2) county FSP administrators, (3) state employment and training (E&T) managers, (4) E&T managers in local offices, and (5) state data-processing managers. We also conducted interviews with representatives of advocacy groups at the state and national levels.

## NUMBER AND CHARACTERISTICS OF ABAWD PARTICIPANTS

**Number of Participants.** In March 2000 there were 422,500 ABAWD participants in the FSP. Approximately 55 percent were living in nonwaived areas. Almost all (93 percent) ABAWD participants living in nonwaived areas were subject to the three-month time limit. The balance of ABAWD participants in nonwaived areas were covered by the 15 percent exemption. The remaining ABAWD participants in the FSP, or 45 percent of the total, were residents of areas that were waived from the time limit because of high unemployment or insufficient jobs.

**Share of the FSP Caseload.** ABAWD participants represented about 2.5 percent of all FSP participants. The small size of this share can be explained by the reasons why participants were excluded from the ABAWD population. Nearly two-thirds of all participants were under 18 or over 50 and therefore excluded by age. Another 9 percent were certified as physically or mentally unfit for employment while 20 percent were responsible for dependent children. About 0.5 percent were pregnant and 3 percent were exempt from FSP work registration for reasons other than those already listed.

ABAWD participants in waived areas accounted for a greater share of all participants 18 to 50—about 12 percent—than did ABAWD participants in nonwaived areas, who represented just 6 percent of that age group. We attribute most of this difference to the absence of a time limit and work requirement, although other differences between waived and nonwaived areas may contribute.

**Trends.** While the ABAWD provisions were expected to reduce the number of food stamp participants who are subject to them, they were implemented during a period of dramatic changes in participation. Along with the total caseload, the number of ABAWD participants started to decline more than two years before the ABAWD provisions were implemented in late 1996. After implementation, the number of ABAWD participants began a steep decline that reduced the ABAWD caseload by more than 40 percent in less than a year. The rate of decline then slowed, and by late 1999 there was evidence that the ABAWD caseload had leveled off—followed, at least a year later, by the total FSP caseload. We estimate that at least half of the

first-year decline among ABAWD participants may have occurred even without the ABAWD provisions. Nevertheless, the provisions themselves had a direct and sizable impact.

**Meeting the Work Requirement.** In March 2000, just over half of the ABAWD participants who were subject to the time limit were meeting the work requirement. Nearly all who met the work requirement did so by working 20 or more hours a week or participating in workfare. However, most of the workfare participants were in Los Angeles or New York state. Elsewhere, participants who met the work requirement did so, for the most part, by working.

These estimates do not include those participants who were exempt from the time limit solely because they were working 30 hours or more or earning more than 30 times the minimum wage. Because such persons are exempt from work registration, states defined them to be outside the ABAWD population. Counting them as ABAWDs subject to the time limit increases the percentage who are meeting the work requirement from 51 percent to 68 percent.

**Other Characteristics.** Compared with all participants 18 to 50, who were predominantly female, those who were subject to the ABAWD time limit were much more likely to be male. Nevertheless, females still accounted for nearly half of this group. Participants subject to the time limit also had smaller household sizes and lower unearned income, and had been participating for a shorter period of time. They were just as likely to have earnings, however.

ABAWD participants who were meeting the work requirement differed in some respects from those who were subject to the work requirement but were *not* meeting it. Participants who were meeting the work requirement had longer spells of participation and lived in somewhat larger households than participants who were not meeting the work requirement. They were also more likely to have earnings. Some participants who were not meeting the work requirement had earnings as well but did not work enough hours to meet the work requirement.

**Terminations.** Nearly 200,000 ABAWD participants were terminated in the first few months that ABAWDs exhausted their time-limited benefits. By March 2000, the total number who had reached the three-month time limit and been terminated had grown to more than 900,000. There is little indication, however, that very many of those who lost their benefits during the first 36 months that the time limit was in place returned to the FSP to receive additional benefits during the next 36-month period.

## **WHO IS SUBJECT TO THE TIME LIMIT? VARIATION IN STATE POLICIES**

States have had broad authority to develop their own ABAWD policies. State authority extends to (1) who is exempted from the definition of an ABAWD, (2) the use of waivers, and (3) the use of the 15 percent exemption. Not surprisingly, states vary in each of these policy areas. The final regulations issued in January 2001 reduce the states' latitude in defining an ABAWD, but they do not eliminate it entirely.

In defining ABAWDs, states have the most latitude in defining who is fit for work and who is responsible for a dependent child.



**Fitness for Work.** Before the final regulations were issued, states had considerable flexibility in determining how to certify a person as unfit for employment. The most important areas of state-to-state variation were:

- ***The types of benefits that, if received, automatically certify a person as unfit for work.*** All but three states gave automatic certification to persons receiving any of the five types of benefits that trigger special FSP eligibility rules for disabled persons, but fewer states recognized other disability benefits.
- ***The types of health professionals who can certify unfitness.*** State policies varied widely on the types of health professionals other than MDs or psychologists who could certify clients as unfit, with only seven states accepting certification from “any” health professional.
- ***Whether a person can self-report a disability.*** In 16 states an eligibility worker can certify a client as unfit for employment based on the client’s self-report.
- ***Whether an eligibility worker can certify based on observation.*** In 35 states, an eligibility worker is allowed to certify an individual from direct observation.

The final regulations require certification from a health professional only when “the unfitness is not evident to the eligibility worker” but do not allow a client’s self-report to be the sole basis for a certification. The regulations consider the receipt of any disability benefits as indirect proof that certification has taken place.

**Responsibility for Dependent Children.** Before the final regulations were issued, states could define the age at which children are considered dependent. All but two states considered a child under the age of 17 or 18 as dependent. States could also determine which adults in a household with a dependent child can be exempted. In 22 states, all adults in the household with a dependent child were exempt from the ABAWD provisions. Four states exempted only one adult per household, and the remaining 24 exempted more than one adult if the adult met certain qualifications. The final regulations remove this flexibility. Children are to be considered dependent until age 18, and the presence of a dependent child will exempt all adults in the household.

**Waivers.** In March 2000, 37 states and the District of Columbia had waivers in effect but there was substantial cross-state variation in terms of how much of the state the waivers covered. The waiver in the District of Columbia was unique because it covered the entire area while three states had waivers only for Indian reservations. Of the 13 states with no waivers, 10 had multiple areas that would qualify. In addition, two states received approval for waivers that some local areas, most notably New York City, elected not to implement.

**15 Percent Exemption.** As of March 2000, 35 states had elected to use the 15 percent exemption, and an additional six states planned to use it in the coming year. States have broad authority in determining who can receive benefits under the 15 percent exemption. Some states apply the exemption to all individuals in a geographic area. Others apply the exemption on the basis of personal characteristics such as homelessness, age, inadequate access to transportation,

and health problems that have not been certified but render the client unable to work. Two states—Arkansas and Illinois—apply the exemption to all persons in areas not covered by waivers, and two other states—Missouri and Tennessee—allow persons who exceed the three-month time limit two additional months of benefits.

States that do not use the 15 percent exemption cite various reasons. These include the difficulty of monitoring the policy, the influence of political considerations, the availability of a sufficient number of jobs, and a desire to be more consistent with their TANF work requirements.

FNS provides states with an annual allotment of exemptions that can be used in that year or carried over to the next year. The allotment equals 15 percent of the estimated number of individuals denied benefits because of the ABAWD provisions—plus any unused allotments from earlier years. Nationally, states used only about 8 percent of the exemptions that were available to them in FY98 and FY99. (Among the states using any exemptions, 12 percent of their FY99 total allotment was used.) Factors contributing to this low usage included the large number of allotted exemptions compared to the actual number of ABAWDs denied benefits, a state's reluctance to use all of its available exemptions, and the difficulty estimating the number of ABAWDs that would meet the criteria established.

**Factors Determining State Policy.** Few states adopted policies that uniformly minimize or maximize the number of participants who are subject to the ABAWD time limit. Rather, most states have adopted a mix of policies, with some tending to increase the number subject to the time limit and some working in the opposite direction. We examined the use of four key ABAWD policies in each state (disability certification, dependent child exemption, waiver use, and 15 percent exemption use). Each policy was classified as strict, moderate, or lenient, where a strict policy refers to one that maximizes the number subject to the time limit. We then combined these ratings to create an ABAWD policy scale in which the lowest value (zero) represents the strictest policies, and the highest value (eight) represents the most lenient. Values for 32 states fell in the middle of the distribution, with 5 states at the strict end and 13 at the lenient end of the distribution. Despite the large number of states in the middle, however, very few states employed only moderate policies.

These findings indicate that there are potentially multiple factors affecting each state's ABAWD policies. Ease of implementation plays a role, and some states have strong advocacy groups that influence policy choices. States may also have competing ideologies at different levels of government.

## **HELPING ABAWDs MEET THE WORK REQUIREMENT: POLICIES AND CHALLENGES**

State policies vary in the extent to which they assist ABAWDs in meeting the work requirement. In particular, states differ in the extent to which they support ABAWDs in finding and retaining employment, in the number and types of work activities they offer to ABAWDs, and in the extent to which these activities are available to all ABAWDs who need them to meet the work requirement.

**What Constitutes Work.** State policies were divided almost equally between those that allowed volunteer work to meet the work requirement under all circumstances and those that did so only sometimes or never. But more than three-quarters of the states with policies agreed that work for less than 20 hours a week could count if it was combined with another qualifying work activity. The final regulations mandate that both volunteer work as well as a combination of work and another qualifying activity can meet the work requirement.

**Job Search.** Generally, job search and job search training are not qualifying work activities, but they can be helpful in finding employment. Independent of the ABAWD provisions, most states required at least some ABAWDs to conduct a job search and most of these offered job search training. A majority of states provided some forms of job search training that met the work requirement. More than half the states required job search training as part of their workfare programs and about a quarter offered job search training through their Job Training Partnership Act (JTPA) or Trade Adjustment Assistance (TAA) programs.

**Support Services.** Most states provided some support services, such as assistance with transportation or other job-related expenses. Support services were viewed as providing important assistance to ABAWDs who work and to those who participate in qualifying work activities. Many state and local E&T managers complained that the \$12.50 per person per month assistance in federal matching funds was inadequate.

**Qualifying Work Activities.** The increased funding for the food stamp E&T program in the BBA is intended to ensure that there are sufficient qualifying work activities for all ABAWDs who need them. In FY99, nearly all states offered ABAWDs some qualifying work activities, but states varied considerably in how many different activities they offered and the extent to which the activities were available to all ABAWDs subject to the time limit. Workfare was the most frequently offered work activity. Nearly half of all states reported that they had a prearranged slot in workfare available for every ABAWD who wanted one. However, 22 states could not offer any qualifying work activity to at least some ABAWDs who were subject to the time limit.

**Use of Federal E&T Funds.** Despite the fact that there are states that have not provided qualifying work activities for all ABAWDs, more than half of the federal funding for E&T services for ABAWDs was unspent in FY99. According to state E&T managers, this results from the difficulties in serving such a small population. The number of ABAWDs is small to begin with, and many do not wish to participate in qualifying work activities. Some states have found that, because the fixed costs of developing and running E&T programs for ABAWDs can be spread over only a small number of people, the reimbursement amount per slot may not be large enough to cover the program costs. Advocates echo this concern. An increasing number of states have opted to be “alternative reimbursement” states. These states are not subject to the reimbursement caps but in return are required to offer a qualifying work activity slot to all ABAWDs in nonwaived areas.

**Perceived Effectiveness of E&T Services.** Most local E&T managers interviewed viewed E&T services as helping at least some ABAWDs find employment. Different activities seem to be helpful for different ABAWDs. Workfare was viewed as helpful for ABAWDs who lack work experience or “soft skills,” (such as how to dress for work and communicate appropriately with coworkers). Education was helpful for ABAWDs who lack credentials. Vocational

training was viewed as helpful for those who lack marketable skills, and job search training was helpful for the “job ready.” Support services were especially helpful for those with transportation difficulties.

**Low Participation.** Both state and local E&T managers noted the low participation of ABAWDs in qualifying work activities—a finding that is broadly consistent with available data. Respondents reported that the lack of motivation of some ABAWDs is one reason for low participation. However, respondents also stated that many ABAWDs face serious barriers to both work and participation in qualifying work activities, including lack of transportation, disabilities that are not medically certified, substance abuse problems, and homelessness.

## **ADMINISTERING ABAWD POLICY: TRACKING AND OTHER CHALLENGES**

The ABAWD provisions significantly increased the complexity of determining FSP eligibility.

**Tracking.** *Tracking* refers to the procedures used to determine whether an ABAWD has received benefits during the past 36 months. The states vary widely in the extent to which tracking is both automated and statewide. While in March 2000 the majority of states operated computer systems that could track ABAWDs statewide, 17 states still had either a very limited tracking system or no automated statewide tracking system. Without a statewide, automated tracking system, the eligibility worker can check the client’s prior receipt of time-limited benefits only by contacting other local offices in the state. No automated procedures exist to track ABAWDs across states.

**Timing Issues.** The law grants states some discretion in:

- ***Defining the Three-Month Time Limit.*** Six states count the month of application toward the three-month time limit while 36 states count only full months of benefits. The other eight states have policies that fall between these two extremes. The final regulations allow states to count only full months of benefits.
- ***Defining the 36-Month Period.*** Twenty-seven states use the most stringent policy to define the 36-month period, a rolling clock, where the 36-month period is always the preceding 36 months. The rest use a fixed clock, in which the beginning and ending dates of the 36-month period do not change. Under a rolling clock, an ABAWD cannot receive more than three months of time-limited benefits in a 36-month period unless they regain eligibility. They can, however, under a fixed clock if they receive time-limited benefits more than three months into the fixed period. The final regulations allow states to use either a rolling or fixed clock.

**Challenges.** While some respondents viewed the ABAWD provisions as unfairly penalizing the targeted population, more disliked the provisions because of the difficulties they encountered in administering them. The policy is viewed as too burdensome, particularly in light of the small size of the ABAWD population. More than half the state respondents (30) identified tracking as one of the main administrative challenges. Difficulties included not only the effort required to develop and maintain an automated system but the burden that tracking placed upon

eligibility workers generally. Other major challenges included ensuring that eligibility workers implemented the policy correctly and translating the ABAWD provisions into state policy. Nearly half of the state respondents volunteered that they would like to have the ABAWD time limit and/or work requirement removed.

## CONCLUSIONS

We draw seven main conclusions from this study:

1. ***The ABAWD population is small.*** It is small because the definition is quite restrictive and because the number of ABAWD participants has declined significantly since the ABAWD provisions went into effect.
2. ***Many ABAWDs who left the program have not returned.*** ABAWDs who used up their time-limited benefits in 1997 became eligible again in 2000, creating the potential for a sharp upswing in participation, yet the trend in participation shows no such change.
3. ***Diverse factors affect states' policy choices.*** There was little correlation between the policy choices made by each state with respect to whether the policy would minimize or maximize the number of persons subject to the ABAWD time limit. Factors contributing to state decisions included administrative considerations, concurrent changes in cash assistance programs, divergent views among policymakers, and pressure from advocates.
4. ***State policies affect the number of participants who are subject to the time limit.*** Waivers, the 15 percent exemption, and the creation of E&T slots have the most discernible and direct effects. Policy defining responsibility for a dependent child affects the number of ABAWD participants, but the final regulations eliminate state discretion.
5. ***The ABAWD provisions are complex and difficult to administer.*** Tracking has been the most challenging aspect. In addition, the rules determining eligibility are difficult for state administrators and eligibility workers to understand and to explain to clients.
6. ***Half of all participants subject to the time limit were meeting the work requirement.*** Of these, about half were working, and nearly all of the rest were participating in workfare. Participants who were exempt from the time limit because they were working 30 hours or more are not counted by states as ABAWDs. Doing so raises the proportion meeting the work requirement to 68 percent.
7. ***While some ABAWDs may be unwilling to meet the work requirement, others are not able to meet it.*** Despite generous federal funding, qualifying work activities are not available for all ABAWDs. Many ABAWDs face significant barriers to both work and participation in qualifying work activities.

## I. BACKGROUND AND OVERVIEW OF STUDY

The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), or welfare reform as it is more commonly known, made significant changes to the Food Stamp Program's (FSP) eligibility rules. To encourage personal responsibility and self-sufficiency, the legislation placed a work requirement and a time limit on benefit receipt on persons viewed as fit to work—able-bodied adults without dependents (ABAWDs). ABAWD participants can meet the work requirement by working or participating in a qualifying work activity. Those who do not satisfy the work requirement are limited to three months of food stamp benefits in a three-year period.

This report presents the findings from a study of the ABAWD provisions conducted by Mathematica Policy Research, Inc. (MPR) and its subcontractor Health Systems Research, Inc. (HSR) for the Food and Nutrition Service (FNS) of the U.S. Department of Agriculture (USDA). The study has two primary objectives. The first objective is to provide national and state estimates of the number and characteristics of people affected by the ABAWD provisions. In particular, we estimate the number of FSP participants who are ABAWDs, the number who are subject to the time limit, the number who are satisfying the work requirement, and the number who receive time-limited benefits. We compare the characteristics of these groups with those of all adult participants, and show how the total number of ABAWD participants and the number who have been disqualified after reaching the time limit have changed over time.

The second objective of the study is to describe how the ABAWD provisions have been implemented across states. Specifically, we describe state variation in policy related to defining ABAWDs and exempting them from the time limit. We also describe state variation in policies aimed at helping ABAWDs meet the work requirement and the challenges of providing

employment and training services to ABAWDs. In addition, we discuss the issues and challenges faced by the states in administering ABAWD policy.

Learning more about the number and characteristics of persons affected by the ABAWD provisions, and about the decisions that states have made in implementing the provisions is important for three reasons. One, this is the first instance that a time limit has been placed on food stamp receipt and that a major group of persons has been made ineligible because of factors other than their income and assets. Two, the states were granted broad latitude in implementing the ABAWD provisions, significantly more than in other areas of the FSP. States can decide, for example, whether to apply for waivers from the time limit for areas of high unemployment, and whether and how to use a “15 percent” exemption through which anyone can be exempted from the ABAWD provisions as long as the total exemptions do not exceed a given federal allotment. Three, to determine FSP eligibility for ABAWDs, states are now required to track food stamp receipt, employment, and participation in qualifying work activities over a period of up to 36 months. Previously, eligibility depended for the most part on household circumstances in a one-month period.

This introductory chapter reviews the ABAWD provisions and discusses the changes to the Food Stamp Employment and Training (E&T) program introduced by the Balanced Budget Act of 1997 (BBA) to encourage states to provide more qualifying work activities for ABAWDs. It also outlines the final federal regulations on the ABAWD provisions, and details the study objectives and data sources.

## **A. THE ABAWD PROVISIONS**

PRWORA states that an ABAWD participant who fails to meet the work requirement will become ineligible for food stamps after receiving three months of benefits in a 36-month period. ABAWDs can meet the work requirement by working, or by participating in a workfare program

or another qualifying work activity. The three months of time-limited benefits need not be consecutive.

ABAWDs who exhaust their three months of benefits lose their eligibility to receive food stamps. They can regain eligibility if during a 30-day period when they are not receiving food stamps they participate in a workfare program, or work or participate in a qualifying work activity for 80 or more hours. An ABAWD who regains eligibility in this way remains eligible as long as he or she continues to meet the work requirement. If, after regaining eligibility, an individual again fails to meet the work requirement, he or she can receive benefits for three additional months starting on the date the person notified the FSP agency that he or she was not meeting the work requirement. An ABAWD may receive these second three months of benefits only once in any 36-month period and must use these months consecutively.

ABAWDs must satisfy the work requirement to avoid using up their time-limited benefits unless they live in an area that is waived from the ABAWD provisions or they are granted a 15 percent exemption as provided by the BBA.

## **1. Definition of an ABAWD**

Under PRWORA, individuals with the following characteristics are not considered ABAWDs:

- Under age 18 or over age 50
- Medically certified as physically or mentally unfit for employment
- Responsible for a dependent child
- Exempt from work registration
- Pregnant

Since the 1980s, the FSP has required at least some adult participants to register for work. The ABAWD time limit applies only to these adults; PRWORA explicitly exempts from the



ABAWD restrictions all individuals who are exempt from work registration. Many of the exemptions from work registration overlap with the ABAWD exemptions. For example, FSP participants who are under 15 or over 60 years of age, or who are physically or mentally unfit are exempt from both work registration and the ABAWD provisions. However, the following persons are exempt from the ABAWD provisions *only* because they are exempt from work registration:

- Persons working 30 hours a week or earning more than an amount equal to 30 hours times the minimum wage
- Persons complying with the work registration requirements for Social Security or Unemployment Compensation
- Persons responsible for the care of an incapacitated person
- Students enrolled at least half time in a school, training program, or institution of higher education
- Regular participants in a drug addiction or alcoholic treatment program

## 2. Meeting the ABAWD Work Requirement

To meet the work requirement, an individual must do one of the following:

- ***Work.*** An ABAWD can meet the work requirement by working 20 or more hours per week, averaged monthly. (However, an ABAWD who works 30 or more hours per week is technically exempt from work registration and hence also exempt from the ABAWD provisions).
- ***Participate in a Workfare or Comparable Program.*** An ABAWD can meet the work requirement by participating in a workfare or other work program. The Fair Labor Standards Act limits workfare participation to the number of hours necessary for the ABAWD to pay off his or her food stamp benefit at the minimum wage.
- ***Participate in Another Qualifying Work Program.*** An ABAWD can meet the work requirement by participating in a qualifying work program for at least 20 hours per week. Qualifying work programs include education programs, vocational training, and self-employment programs. PRWORA explicitly states that, with some exceptions, job search and job search training are not approved work programs. The

exceptions include job search and job search training that are part of a Workforce Investment Act (WIA) or Trade Adjustment Assistance (TAA) program.<sup>1</sup>

### **3. Waivers**

At the request of a state agency, USDA may waive the ABAWD time limit and associated work requirement for people who live in an area where the unemployment rate is over 10 percent or where there is an “insufficient number of jobs” to provide employment. Waivers, when approved, usually last for one year. An area can qualify as having an insufficient number of jobs if it: (1) is designated as a Labor Surplus Area by the U.S. Department of Labor, (2) qualifies for extended Unemployment Insurance benefits, (3) has a low and declining employment-to-population ratio, (4) has a lack of jobs in declining occupations or industries, (5) has a 24-month average unemployment rate that is 20 percent above the national average for the same period, or (6) presents other compelling evidence of an insufficient number of jobs. The most common geographic unit for a waiver is the county, though several states have received waivers for cities, municipalities, Indian reservations, and census tracts.

### **4. 15 Percent Exemption**

The BBA allows states to exempt from the time limit up to 15 percent of the estimated number of people in the state who would be denied eligibility for food stamp benefits because of the ABAWD provisions. Whether the exemption is used and the criteria for determining who qualifies for the exemption are matters of state discretion.

As the number of persons currently ineligible for the FSP because of the ABAWD provisions is unknown, the BBA directs USDA to estimate the number and provide the states with an annual allotment of 15 percent exemptions. USDA estimates this number based on three

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<sup>1</sup> WIA replaced the Job Training Partnership Act (JTPA) on July 1, 2001.

factors: the estimated number of persons in FY96 who would have been found ineligible if the ABAWD provisions had been in place, subsequent changes in the FSP caseloads, and estimates of the number of persons covered by waivers. Unused exemptions from each state's allotment can be carried over to the next year while exemptions in excess of the allotment are subtracted from the next year's allotment.

## **5. Final ABAWD Regulations**

In December 1999, FNS published proposed regulations on the implementation of the ABAWD provisions (*Federal Register*, December 17, 1999). Final regulations, published in January 2001 (*Federal Register*, January 17, 2001), were effective August 1, 2001 and were required to be implemented by the state agencies no later than October 1, 2001. This report addresses the implications of these regulations for ABAWD policy.

The regulations address eight topics: (1) meeting the work requirement, (2) implementing the time limit, (3) establishing verification and reporting requirements, (4) tracking the receipt of time-limited benefits, (5) determining eligibility for others in the household, (6) exempting individuals from the work requirement, (7) regaining eligibility, and (8) applying for waivers. Appendix A lists the main requirements of these regulations in each of these areas.

## **B. BBA PROVISIONS DESIGNED TO INCREASE THE AVAILABILITY OF QUALIFYING WORK ACTIVITIES**

States can fund E&T services through either their Food Stamp E&T programs, which are 100 percent federally funded, or through federal matching funds, which reimburse states for 50 percent of the allowable costs expended. Prior to the BBA, states had considerable flexibility in how they used the E&T funds, including what services they funded and which populations were targeted. In response to concern about the lack of opportunities for ABAWDs to participate in qualifying work activities, the BBA significantly increased the funding for Food Stamp E&T

programs but targeted the increased funding to qualifying work activities for ABAWDs. (It did not, however, place any restrictions on the use of the federal matching funds.) Specifically, the BBA:

1. ***Substantially Increased Funding.*** Federal funding increased by \$131 million in fiscal year 1998 (FY98), FY99, FY00, and FY01, and it will increase by \$75 million in FY02. In FY98, the BBA increased the funding for Food Stamp E&T programs by over 60 percent.<sup>2</sup>
2. ***Concentrated the Funding on ABAWDs.*** The BBA requires 80 percent of a state's allocation of federal funds be spent on qualifying work programs for ABAWDs. The remaining 20 percent of federal funds can be spent on activities for FSP participants who are not ABAWDs or on nonqualifying activities.
3. ***Set Capped Reimbursement Rates.*** The BBA authorized FNS to set caps on the rate at which the state agency can be reimbursed with federal funding for providing qualifying work activities. Recognizing that some E&T slots are not filled, FNS set a monthly reimbursement rate of \$175 for a filled slot and \$30 for a slot that is offered but not filled.
4. ***Introduced a Maintenance of Effort (MOE) Requirement.*** To receive the increased federal funding for E&T, the states must maintain or exceed the FY96 E&T expenditures they financed from nonfederal sources.

## **C. OBJECTIVES OF THE STUDY**

The study has two broad objectives: to provide estimates of the number and characteristics of people affected by the ABAWD provisions and to describe how the ABAWD provisions have been implemented by the states.

### **1. To Provide Estimates of the Number and Characteristics of People Affected by the ABAWD Provisions, Nationwide and by State**

For the most part, we provide a snapshot of the number and characteristics of ABAWDs in March 2000, before the final regulations were issued but shortly after the proposed regulations were published. We also examine how the number of ABAWDs participating in the FSP and the

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<sup>2</sup> The Agricultural Research, Extension, and Education Reform Act of 1998 subsequently reduced the authorization levels for the FSP E&T program by \$100 million in FY99 and \$45 million in FY00.

number who lost eligibility because of the time limit have changed historically. We address seven more specific research questions:

1. ***How Many FSP Participants Are ABAWDs?*** To what extent are persons exempted from the provisions because of their age, because they are “unfit for employment,” because they have dependents, or because of other ways in which they do not meet the definition of an ABAWD?
2. ***How Many ABAWDs Are Subject to the Time Limit?*** To what extent are ABAWDs exempted from the work requirement by waivers or by the 15 percent exemption?
3. ***How Has the Number of ABAWDs Changed over Time?*** How does the trend compare with that of all FSP participants?
4. ***How Many ABAWDs Who Are Subject to the Time Limit Are Satisfying the Work Requirement?*** Of those who are satisfying the work requirement, how many are doing so by working, and how many are doing so by participating in workfare or other qualifying work activities?
5. ***How Many ABAWDs Who Are Subject to the Time Limit Are Receiving Time-Limited Benefits?*** How many ABAWDs subject to the time limit are not satisfying the work requirement and are receiving one of their months of time-limited benefits?
6. ***How Many ABAWDs Have Reached the Time Limit and Been Disqualified?*** How have the numbers changed over time? What is the cumulative number of terminations?
7. ***What Are the Characteristics of ABAWDs and Their Households?*** Do the characteristics of ABAWDs who meet the work requirement differ from the characteristics of ABAWDs who do not meet the work requirement?

Previous studies have addressed questions 1, 2, 3, 4, and 7 for earlier periods and with more limited data than this project. Stavrianos, Cody, and Lewis (1997) and Stavrianos and Nixon (1998) used Food Stamp Program Quality Control (FSPQC) sample data to estimate the number and characteristics of ABAWDs who would have been participating in the FSP in 1995 if the ABAWD provisions had been in place at that time. Cody and Castner (1999) used a similar methodology to estimate the average monthly number and characteristics of ABAWD participants for each fiscal year from 1994 through 1997, and Cody (1999) extended some of these estimates to 1998. The U.S. General Accounting Office (U.S. GAO 1998) obtained estimates of ABAWD participants by waiver status directly from 42 states for the middle of 1998

but did not attempt to extrapolate the findings to the full nation. This report also presented FNS statistics on the number of participants who were meeting the work requirement through federally reimbursed workfare and other E&T activities, and most of the studies cited above provided estimates of both work and E&T participation among ABAWDs, but without information on whether these activities met the work requirement. The estimates presented in this report update and improve on these earlier estimates by supplementing state reports on ABAWD participants and their characteristics with FSPQC data, which we use to evaluate, refine, and extend the state numbers. In addition, we provide more complete answers to questions 3 and 4 and present the first estimates that address questions 5 and 6.

While this study goes a long way in building an understanding of the implications of the ABAWD provisions, determining the full impact of the provisions means understanding what happens to ABAWDs after they leave the FSP. It is beyond the scope of this study to address this issue. However, four state-specific studies funded by the Economic Research Service (ERS) of USDA address how ABAWDs and other former food stamp participants fare after leaving the program (Garasky et al. 2000, Mills and Kornfeld 2000, and Rangarajan and Gleason 2001).<sup>3</sup>

## **2. To Describe How the ABAWD Provisions Have Been Implemented**

Given the discretion accorded to the states in implementing the ABAWD policy, different states have implemented the ABAWD provisions quite differently. It is important to understand how the policies have been implemented for four reasons. First, the information on implementation provides a first check on the statistics provided by the states. For example, we checked that the state-reported proportion of ABAWDs who live in waived areas is commensurate with the waivers that the state received. Second, an understanding of policy

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<sup>3</sup> The report on the fourth study is forthcoming.

implementation will help us interpret differences between states in terms of the number of people both subject to and satisfying the work requirement. Third, it will help FNS predict the impact of the final ABAWD regulations on state policy and on the number of ABAWDs. Fourth, describing policies that have been used by some states may be helpful to other states in redesigning their ABAWD policy.

To describe how the ABAWD provisions were implemented, we address three research questions:

1. ***How Much Do State Policies Vary in Determining Who is Subject to the Time Limit?*** How do states vary in who is exempt from the ABAWD provisions? How many states applied for and implemented waivers? To what extent, and how, are the states using the 15 percent exemption?
2. ***To What Extent Are States Helping ABAWDs Meet the Work Requirement?*** How do states vary in the extent to which they help ABAWDs find and retain employment? To what extent are the states offering ABAWDs qualifying work activities? Which services do states feel are most effective at helping ABAWDs find employment? What are the challenges of providing E&T services to ABAWDs and how have these challenges been addressed?
3. ***How Have the ABAWD Policies Been Administered?*** How have the states tracked the receipt of time-limited benefits by ABAWDs? What challenges have arisen in administering the policy? How have the states addressed those challenges?

We focus mainly on ABAWD policy as implemented in March 2000. However, some data on the qualifying work activities provided by state agencies refer to FY99.

Previous studies have documented some state policy choices. In 1997, HSR conducted a survey of state FSP agencies to obtain information on state policy choices after welfare reform, including ABAWD policy choices (Gabor 1998). GAO (1997) first conducted a survey of state FSP agencies in 1997 to identify policies designed to assist people who lose FSP eligibility because they are ABAWDs or immigrants and then in 1998 conducted another survey on state E&T activities (GAO 1998).

The study documented in this report adds to the information provided by these three earlier studies by focusing on a more recent period (March 2000) and by giving more details on a wider range of policies affecting ABAWDs. In summer 1999, HSR conducted a study for ERS (Botsko et al. 2000), which complements our study. The ERS study focused on the extent to which states use the new funds available from BBA to create workfare and other E&T slots for ABAWDs. As described below, the State E&T Managers Survey in our study was designed to serve our data needs and those of the ERS study.

#### **D. SOURCES OF DATA**

A comprehensive study such as this one requires multiple data sources to adequately address all the research questions. Most of the data for this study were provided by staff at state, county, and local FSP agencies.<sup>4</sup> Other important data were obtained from FNS databases. We describe below the data sources we used to address each of the two main research objectives.

##### **1. Data Sources for Determining the Number and Characteristics of ABAWDs**

An important strength of this study is its use of multiple data sources to assess the number and characteristics of FSP participants affected by the ABAWD provisions (Table I.1). Data collected through the states' food stamp management information systems, enhanced in many cases to capture and store information on participation by ABAWDs, are the most authoritative source for determining how many participants have been classified as ABAWDs, how many of these individuals have become subject to the time limit, how many have satisfied the work requirement to retain their benefits, and how many have been terminated or disqualified from the program as a result of using up their time-limited benefits. The data that only the states can supply therefore become central to this study.

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<sup>4</sup> All the instruments used to collect these data are provided in Volume II of this report.



While the primary data source for estimates of the ABAWD population is a set of state-produced tabulations, information to validate and supplement these numbers come from a variety of other sources, including actual caseload data from five states, FSPQC data, and pertinent information reported by the states to FNS. By using multiple sources of data, this analysis addressed many of the limitations posed by states' automated management information systems. The following sections of the report describe each of these sources in more detail.

**a. Tabulations Provided by the States**

States provided tabulations in response to a detailed set of worksheets and instructions. To provide a snapshot of the number and characteristics of ABAWDs at a point in time, most of the items were requested for March 2000. However, we asked for monthly counts of the number of participants terminated or disqualified because of the ABAWD provisions since the implementation of the policy.

The states varied in the extent to which they were able to meet the full request. Appendix B provides a description of the data provided by each state. All but 10 states were able to supply basic counts of ABAWDs subject to the time limit. Most of these states also provided some other data, such as the number of ABAWDs who live in areas that were waived from the time limit, and several states were able to provide tabulations of ABAWDs subject to the time limit by age, sex, race, household size, benefit level, consecutive months of benefit receipt, and income. Only six states could provide data on the monthly number of ABAWDs who were terminated or disqualified since the ABAWD provisions went into effect, but another six states were able to produce monthly counts starting some time later. Generally, the larger states were the most responsive, and this accounts for much of the strength of the national estimates presented in this

TABLE I.1

SOURCES OF DATA TO ADDRESS RESEARCH QUESTIONS ON THE NUMBER AND CHARACTERISTICS OF PERSONS AFFECTED BY THE ABAWD PROVISIONS

Research Question	State Tabulations	Caseload Data	Food Stamp QC Data	Form FNS-583
How many FSP participants are ABAWDs?	√	√	√	√
How many ABAWDs are subject to the time limit?	√	√	√	
How has the number of ABAWDs changed over time?	√		√	
How many ABAWDs who are subject to the time limit are satisfying the work requirement?	√	√	√	√
How many ABAWDs who are subject to the time limit are receiving time-limited benefits?	√	√	√	
How many ABAWDs have reached the time limits and been disqualified?	√			
What are the characteristics of ABAWDs and their household?	√	√	√	

report. All of the states were given the opportunity to review the state-level statistics presented in this report and to revise their initial submissions.

**b. Caseload Data for Five States**

We requested and received caseload data from five states—four of them for the entire March 2000 caseload and one for a sample of the FY00 caseload. The caseload micro data were used to describe in more detail the characteristics of ABAWDs and to examine relationships between selected characteristics. To reduce the burden on these five state agencies, we used their micro data to prepare the counts requested of all other states.

**c. FSPQC Data**

The FSPQC database is a nationally- and state-representative sample of about 60,000 food stamp households per year; the sample is drawn by the individual states in order to comply with food stamp quality control procedures. Samples of cases are drawn every month in each state, and a standard set of items is coded and transmitted to FNS. The data have been used to support

many previous analyses of the food stamp caseload—including estimates of the size of the ABAWD population in FY96 (Stavrianos and Nixon 1998). In FY98, a code identifying ABAWD status was introduced. While some important limitations have been identified, this code nevertheless enhances the value of the FSPQC sample data for analysis of ABAWD issues.

We used the FSPQC data in three ways: (1) to supplement the tabular data for states that were not able to complete the full data request, (2) to estimate trends in the number of ABAWD participants, and (3) to describe the number and characteristics of all adult participants. When a state was not able to supply a particular data item, we estimated the missing item from the state's FY00 FSPQC data. When we needed an item to produce state-level estimates, we adjusted the FSPQC data to be consistent with other items provided by the state, such as the number of participants subject to the time limit. When we needed the missing item only to prepare national estimates, we adjusted the FSPQC data at a more aggregate level (across groups of states). Appendix B discusses in detail our use of the FSPQC sample data to supplement the state tabulations.

#### **d. Form FNS 583**

Beginning in FY99, the states were required to submit to FNS a quarterly report (Form FNS 583) detailing what E&T services they provide for ABAWDs and other FSP participants, and indicating how many of their allotted 15 percent exemptions had been used. Data are reported for each of the three preceding months. We used data from FNS 583 for March 2000 to supplement the data submitted by the states on the number of participants meeting the work requirement through workfare or education and training and on the number exempted under the 15 percent provision. We used the Form 583 numbers when a state provided no data. We also used Form 583 data for FY99 and FY00 to perform additional analysis of the use of qualifying work activities and the use of the 15 percent exemption.

**e. Limitations of Data on ABAWD Participants**

States differ in what characteristics of the ABAWD population they have found useful to tabulate on a regular basis and how closely they have monitored the size and composition of this population, including, in particular, the frequency with which ABAWDs are meeting the work requirement. This affected how much individual states could tell us about their ABAWD populations and the confidence with which they could do so. For example, few states could report what proportion of the ABAWDs subject to the time limit were meeting the work requirement, and fewer still could detail how many were meeting it by working, participating in workfare, or participating in another qualifying work activity. When a state *could* provide such information, the data often came from special tabulations rather than reports that state staff had become accustomed to reviewing.

The variation in state practice also affected both the comparability of data across states and, from what we could observe, their quality. Providing estimates to us required a number of states to try to fit *their* concepts to ours. For example, one state does not include in its monthly ABAWD counts those participants who are meeting the work requirement by working. Other states define the ABAWD population to include those who are exempt from work registration for reasons other than age, unfitness for employment, responsibility for a dependent child, or pregnancy. Issues of data quality were evident in the frequent discrepancies between state tabulations, FSPQC data, and the reports submitted by states on form FNS 583. Which source is best is likely to depend on the state and the item.

When aggregated to the national level, there is enough consistency across the sources to invite confidence that key characteristics of the ABAWD population have been described with reasonable accuracy. However, caution is warranted in making comparisons across states, as differences are undoubtedly overstated.

## **2. Data Sources for Understanding ABAWD Policies and Their Implementation**

We conducted five surveys to collect a broad range of information on state choices on ABAWD policies and their implementation:

1. A survey of state FSP directors and managers of local office operations
2. A survey of county FSP administrators
3. A survey of state E&T managers
4. A survey of E&T managers in local offices
5. A survey of data-processing managers

We also conducted interviews with representatives of advocacy groups. Table I.2 indicates which surveys were used to address each research question.

### **a. State Food Stamp Program Director Survey**

In spring and summer 2000, we conducted a telephone survey with staff at the state FSP office in all 50 states.<sup>5</sup> The purpose of this survey was to collect information about state ABAWD policies. The survey included questions on the definition of ABAWDs, the use of waivers, the 15 percent exemption, tracking and other administrative issues, and challenges posed by the provisions. We asked about the policies in effect in March 2000—the month for which we collected data on the number of ABAWDs. The respondents to this survey varied. While we suggested that the state FSP director and the manager of local office operations might be best able to answer our questions, respondents also included the deputy FSP director or a staff-person responsible for ABAWD policy.

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<sup>5</sup> As the District of Columbia is completely waived from the ABAWD provisions, most of the questions on this survey were not relevant to the District. We did, however, conduct a short interview with a staff member of the FSP agency in the District of Columbia to learn how it defines an ABAWD.

TABLE I.2

## SOURCES OF DATA TO ADDRESS RESEARCH QUESTIONS ON THE IMPLEMENTATION OF ABAWD POLICIES

	Survey of State FSP Directors	Survey of County FSP Administrators	Survey of State E&T Managers	Survey of Local E&T Managers	Survey of Data- Processing Managers	Form FNS-583
What policy choices have states agencies made in designing ABAWD policies?	√	√				
To what extent are states offering ABAWDs workfare and other qualifying work programs?			√	√		√
How have the ABAWD policies been administered?	√	√			√	

**b. County FSP Administrator Survey**

In 15 states, the FSP is administered by the counties rather than the state. In these states, some policy decisions are set at the county, rather than at the state, level. To complete our information on ABAWD policies in these states, we planned to conduct telephone interviews with eight county administrators in any of the 15 states in which important decisions about ABAWD policy were made at the county level (Czajka et al. 1999). As it turned out, key elements of ABAWD policy were set at the county level in only two states: California and New York. In both states, the county determines how “unfit for employment” is defined and decides whether and how to use the 15 percent exemption. In California and New York, we conducted interviews with eight county FSP administrators, asking questions only about the policies made at the county level.<sup>6</sup> The eight counties were randomly selected from a list of all partially waived and nonwaived counties in each state. In Alabama and North Carolina, we found that while the

<sup>6</sup> One county in New York refused to participate in the survey. The interview was instead conducted with a member of the FNS regional office familiar with the ABAWD policy in that county.

state sets most aspects of ABAWD policy, the counties determine some aspects of the definition of unfit for employment. Since we did not consider these responsibilities to involve *major* policy decisions, we conducted two, rather than eight, county interviews in those states. In the remaining 11 states where the FSP is county-administered, the state agency sets all the key elements of ABAWD policy.

**c. State E&T Managers Survey**

In summer 1999, HSR conducted a telephone survey of state E&T managers in all 50 states and the District of Columbia. The instrument for the survey was developed jointly by MPR and HSR for both this study and another study funded by the ERS. In this study, we used information from questions directed to E&T managers about the amount and types of qualifying work activities offered to ABAWDs in the state, policies related to these activities, and challenges in offering these activities to ABAWDs.

**d. Local E&T Managers Survey**

In spring and summer 2000, HSR conducted a telephone survey of E&T managers at local offices. The purpose of this survey was to obtain from staff who work directly with the ABAWD population some information about the effectiveness of different work activities in assisting ABAWDs and about the challenges involved in serving this population. This survey asked about qualifying work activities offered to ABAWDs in the office itself, policies related to the provision of these activities, and the perceived effectiveness of each type of activity in assisting ABAWDs. Some state FSP agencies contract with other public or private agencies to provide E&T services to FSP participants. In these states, we often interviewed an appropriate staff member at the relevant agency instead of the local food stamp office.

We sampled the local offices for this survey in two stages. First, we selected two counties (eight counties in California and New York because we were also interviewing eight county

administrators) from a list of all nonwaived counties in each state. We selected each county with a probability proportional to the number of FSP participants who did not receive public assistance (NPA clients). Given that most ABAWDs do not receive public assistance, the sampling procedure ensured that we were more likely to select counties with larger ABAWD populations. Second, we confirmed with the state agency that the county does provide E&T services to ABAWDs, and we then randomly selected a local office within the county. Again, we selected the local office with the probability of selection proportional to the number of NPA clients in that office so that we disproportionately selected local offices with larger ABAWD populations. We favored counties with larger ABAWD populations because of their greater experience in dealing with ABAWDs (many counties see very few ABAWDs).<sup>7</sup> In six states, MPR selected one or more of the counties that did not provide E&T services. For those states, we randomly selected replacement counties.

We sampled local offices in all but the following four states:

- ***Arkansas and Illinois.*** In these states, all ABAWDs who become ineligible for failing to meet the work requirement are exempted from the time limit under the 15 percent exemption.
- ***Kansas and Oklahoma.*** These states did not provide any E&T services to ABAWDs.

We also did not sample local offices in the District of Columbia, which is totally waived from the ABAWD provisions. We sampled a total of 103 local offices: eight each in California and New York, one in Rhode Island, and two in each of the remaining 43 states. In Rhode Island only one local office provides E&T services to ABAWDs.

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<sup>7</sup> Two randomly selected, small counties had fewer than 10 ABAWDs. As they had so few ABAWDs, we randomly selected different counties to replace them.



We completed 94 interviews out of the 103 sampled offices for a response rate of 91 percent. Two states and two counties in New York refused to participate in the survey, and we were unable to schedule interviews in another three counties. After completing the interviews, we found that one sampled local office did not provide any E&T services. Hence, we report information from 93 local offices.

**e. Data Processing Manager Survey**

Several questions on the tracking of ABAWDs' use of time-limited benefits were included in the State FSP Director Survey, but the best person to provide information on the tracking of time-limited benefits is often the data processing manager. Hence, we included a short questionnaire for data processing managers about tracking in our mailing of the data request. We received completed questionnaires from all 50 states and the District of Columbia.

**f. Interviews with Representatives of Advocacy Groups**

We conducted structured interviews with representatives of about a dozen advocacy groups at the state level, primarily, to obtain their perspective on the ABAWD provisions. We discussed a wide range of issues including the steps the advocacy community has taken on behalf of ABAWDs, the effectiveness of the policy in helping ABAWDs seek and find employment, how the target population has responded to the provisions, how well this population understands the ABAWD provisions, the challenges that serving this population presents, and how the effectiveness of the policy might be improved.

**E. ORGANIZATION OF THE REPORT**

The rest of the report is organized as follows. The next chapter presents estimates of the number and characteristics of ABAWDs. State choices in implementing ABAWD policies are described in Chapter III. Chapter IV discusses policies related to meeting the work requirement

and the extent to which ABAWDs are offered qualifying work activities. Some issues related to the implementation of ABAWD policy are discussed in Chapter V, and Chapter VI summarizes our principal conclusions.

## **II. ABAWD PARTICIPANTS IN THE FOOD STAMP PROGRAM: NUMBER AND CHARACTERISTICS**

The PRWORA legislation placed limits on the amount of time that ABAWDs could receive food stamps unless they were engaged in work or a qualifying work activity. However, PRWORA allowed states to waive the time limit in areas with high unemployment or insufficient jobs, and later legislation enabled states to exempt a fraction of the participants who would otherwise have lost benefits because of the time limit. To begin to understand the full implications of the ABAWD provisions, we need to know how many participants are defined as ABAWDs, how many of these live in waived versus nonwaived areas, how many of those in nonwaived areas are meeting the work requirement, and how many of the remainder are either exempt or at risk of using up their time-limited benefits.

In this chapter, we present estimates of the number and characteristics of FSP participants the states defined as ABAWDs and, therefore, potentially subject to the three-month time limit. We begin by presenting national estimates of the number of ABAWD participants in the FSP in March 2000. Next we present state estimates, which illustrate how the fraction of the population that is potentially subject to the time limit varies across jurisdictions. Then we examine the trend in ABAWD participation over time and discuss how often FSP participants who were subject to the ABAWD time limit were meeting the work requirement and how they were doing so. Next we explore some of the characteristics of ABAWD participants who were subject to the time limit, how they compare with those of all adult participants, and how participants who were meeting the work requirement differ from those who were not. We complete our empirical findings with estimates of how many ABAWDs have reached the three-month time limit since the ABAWD provisions went into effect and how the number hitting the time limit has changed from month to month. We conclude with a summary of our major findings.

## **A. NATIONAL ESTIMATES OF THE NUMBER OF ABAWD PARTICIPANTS**

PRWORA specifies that participants who are 18 to 50 are not subject to the ABAWD time limit if they are:

- Medically certified as physically or mentally unfit for employment
- Responsible for a dependent child
- Exempt from the FSP work registration requirement
- Pregnant

ABAWDs are those participants who are left after these exclusions.

If a state applies, gets approval, and implements a federal waiver, ABAWDs who live in areas with high unemployment or insufficient jobs, as defined under PRWORA, can be exempted from the time limit. For those living in a waived area, none of the benefits that they receive count against the three-month limit.

ABAWDs who live in *nonwaived* areas are subject to the time limit and must meet the ABAWD work requirement to maintain their eligibility for benefits. Any month in which an ABAWD recipient fails to satisfy the work requirement counts against his or her three-month limit. Some ABAWDs may be given individual exemptions up front under their state's use of the 15 percent waiver authority, but these exemptions are more often used to extend benefits to recipients who have already exhausted the three months.

### **1. Earlier Estimates**

Previous efforts to estimate the number of ABAWD participants in the FSP relied almost exclusively on simulations of ABAWD status based on FSPQC sample data. These simulations used age, the receipt of disability benefits, the presence of a child under 18 in the household, and exemption from FSP work registration to determine who would have been excluded from the ABAWD population, with the remainder being defined as ABAWDs. Applying this

methodology, Stavrianos and Nixon (1998) estimated that 941,000 participants per month, on average, would have been identified as ABAWDs in FY96 if PRWORA had been in effect at the time.<sup>1</sup>

Researchers continued to use simulation methods to estimate the number of ABAWDs even after states implemented the ABAWD time limit. There were three principal reasons for this. First, FSPQC data did not directly identify ABAWDs until FY98, so estimates for FY97 had to rely on some form of simulation. Second, the ABAWD code field that was introduced in FY98 had a number of inconsistencies with other variables in the FSPQC data, raising questions about its validity (see Castner 2000 and Czajka 2000). Third, applying a consistent simulation methodology made it possible to estimate trends in the number of ABAWD participants pre- and post-PRWORA. However, the early simulations were developed with little information on state policies regarding the operational definition of an ABAWD, so they minimized differences among the states and potentially either understated or overstated the national totals. Nevertheless, these initial estimates provided an early glimpse into the impact of PRWORA on the food stamp caseload and are still useful in documenting trends.

In preparing a 1998 report, the GAO took a different approach to estimating the number of ABAWD participants. GAO staff asked the states how many ABAWD participants they had and how many were living in waived versus nonwaived areas. They obtained estimates from all but eight, primarily small, states and the District of Columbia. The 42 states reported a monthly average of 514,000 ABAWD participants over April, May, and June 1998 (GAO 1998). Of this total, 296,000 or about 58 percent were subject to the time limit, 208,000 (40 percent) were living in waived areas, and another 9,600 (2 percent) were exempted under the 15 percent

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<sup>1</sup> This estimate excludes those legal aliens who are likely to have been made ineligible for food stamps by PRWORA.

provision. The nonreporting states accounted for about 9 percent of the total food stamp caseload, suggesting that they could have added an additional 50,000 ABAWDs to the total *if* ABAWDs occurred with the same relative frequency as in the other states.

This report relies on both methodologies to generate estimates of the number of ABAWDs who were participating in the FSP in March 2000. First, we asked the states to report the number of ABAWD participants for March 2000. We requested additional information to help determine how the ABAWD participants fit into the larger food stamp population, describe some of their characteristics, and give us a basis for evaluating state-to-state variation in the numbers. We also consulted the state reports submitted to FNS on Form 583. Second, we employed FSPQC data from the FY99 and FY00 samples to help us evaluate the data the states gave us and to fill in some of the items that individual states could not provide. While the FSPQC data on ABAWDs are limited by small sample sizes, the omission of key measures, and other deficiencies that are less well understood, they are available for all states and, for most items, reflect well-established procedures that have been reviewed at the state and federal levels.

The data submitted to us by the states have limitations in addition to missing items—mostly due to the constraints imposed by state management information systems or the reports that they generated. When we determined—often in consultation with state staff—that particular state numbers differed conceptually from what we were trying to measure or were inconsistent with other state data, we substituted FSPQC data. Our approach to combining these data sources is detailed in Appendix B.

## **2. ABAWD Participants as Defined Under PRWORA**

ABAWDs constitute a fairly small fraction of the overall FSP population. In March 2000, 17.2 million people received food stamps in the United States. In that month 422,500 or 2.5 percent of all participants were ABAWDs (Table II.1).

TABLE II.1

## ESTIMATED NUMBER OF ABAWD PARTICIPANTS IN THE FSP, MARCH 2000

	Number of ABAWD Participants	Percent of Total ABAWD participants	Percent of All FSP Participants
<b>Total ABAWD Participants</b>	<b>422,500</b>	<b>100.0</b>	<b>2.5</b>
<b>ABAWD Participants in Nonwaived Areas</b>	<b>232,000</b>	<b>54.9</b>	<b>1.3</b>
Subject to the Time Limit	215,800	<b>51.1</b>	<b>1.3</b>
Excluded Under the 15 Percent Exemption	16,200	<b>3.8</b>	<b>0.1</b>
ABAWD Participants in Waived Areas	<b>190,500</b>	<b>45.1</b>	<b>1.1</b>

Three factors account for why this figure differs from earlier estimates. First, the number of ABAWD participants declined dramatically from 1996 to 2000. Later we document this decline with estimates based on simulations like those Stavrianos and Nixon employed. Second, a number of states improved their estimates of ABAWD participants after the GAO survey. Third, the additional data that we collected from the states and a comparison of the state estimates with those obtained from FSPQC data allowed us to refine the state estimates even further.

Slightly more than one-half of the ABAWDs (55 percent) in March 2000 were living in nonwaived areas, and 215,800 of these participants—about 51 percent of all ABAWDs—were subject to the three-month time limit. The balance of ABAWD participants in nonwaived areas, numbering 16,200 or just 4 percent of the total, were exempted from the time limit under their state's 15 percent waiver authority. The remaining ABAWD participants, numbering 190,500 or 45 percent of the total, were residents of areas that were waived from the time limits because of high unemployment or insufficient jobs. Their future benefit eligibility was not affected in any way by whether they worked or participated in work-related activities, although in most states

TABLE II.2

FOOD STAMP PARTICIPANTS EXCLUDED FROM THE ABAWD POPULATION,  
BY REASON, MARCH 2000

Reason for Exclusion	Number of Participants Excluded	Percent of Participants Excluded
<b>Total Number of FSP Participants</b>	<b>17,217,600</b>	--
Participants Excluded by Age		
Under 18	8,785,800	51.0
Over 50	2,545,000	14.8
Participants Defined as Unable to Work		
Not Fit for Employment	1,508,700	8.8
Responsible for a Dependent Child	3,436,800	20.0
Otherwise Exempt from Work Registration	439,800	2.6
Pregnant	79,000	0.5
Total Participants Excluded	16,795,000	97.5

SOURCE: Counts provided by the states and supplemental estimates prepared by Mathematica Policy Research, Inc., from FSPQC data.

they were required to register for work under provisions that predated time limits. ABAWD participants who were subject to the time limit accounted for 1.3 percent of the total caseload in that month.

### 3. Exclusions from the ABAWD Population

Age restrictions excluded two-thirds of the food stamp caseload from the ABAWD population. In particular, just over one-half (51.0 percent) of the 17.2 million food stamp participants in March 2000 were under the age of 18, and 14.8 percent were over 50 (Table II.2). The language in PRWORA regarding the upper age limit for ABAWDs was open to interpretation. Most states have interpreted “18 to 50” as including people up to their 50th birthday, but a few states drew the line at the 51st birthday (see Chapter III). Our estimates of



participants age 18 to 50 in Table II.2 and elsewhere in this chapter are consistent with state policies.

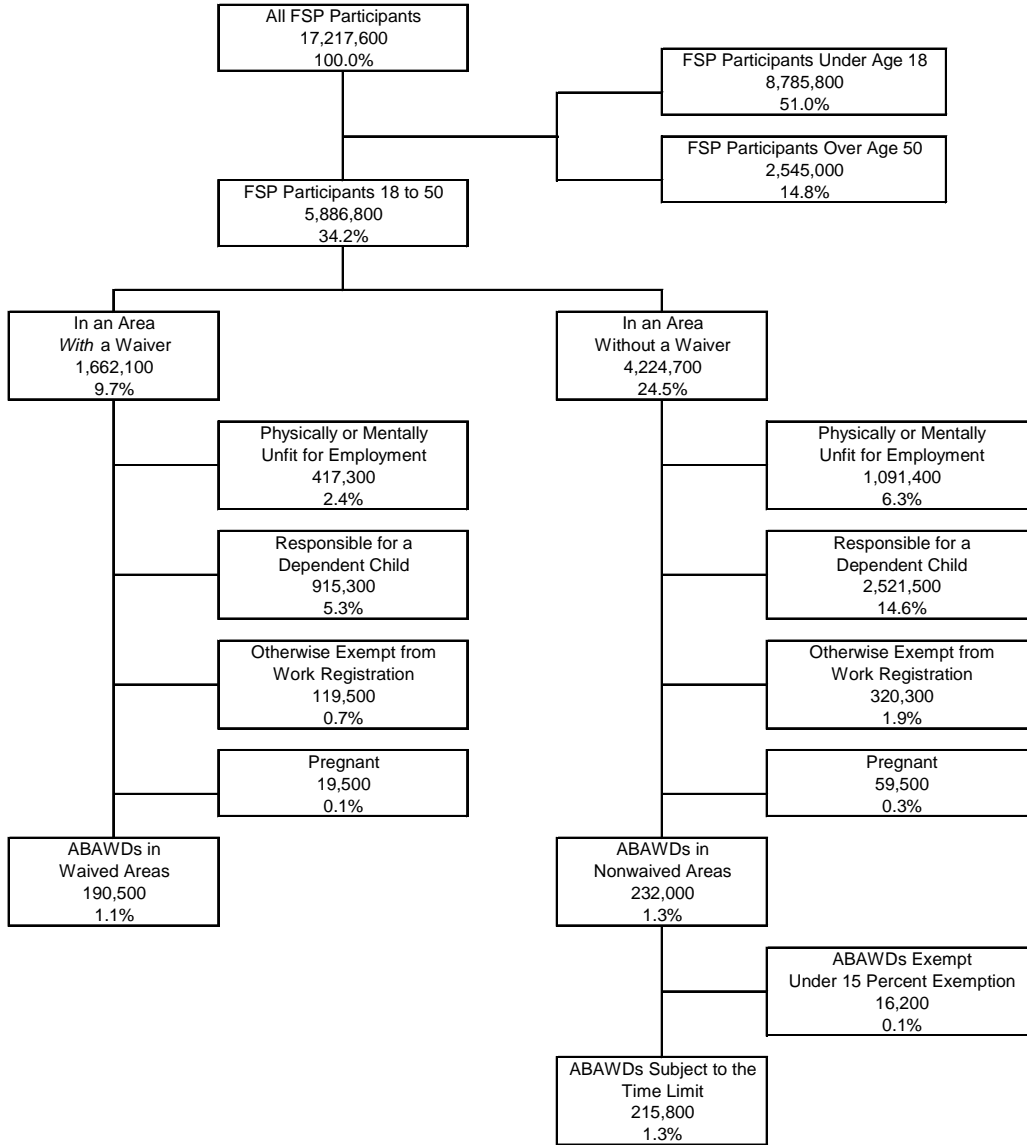
The four additional exclusions outlined in the legislation removed nearly a third of all participants from the ABAWD population, with responsibility for a dependent child being the most important. About 1.5 million or 8.8 percent of all participants were excluded from the ABAWD population because they were certified as physically or mentally unfit for employment. Another 3.4 million (20.0 percent) were excluded because they were responsible for a dependent child. Other than being under 18, this was the single biggest category of exclusions from the ABAWD population. After these exclusions, relatively few participants were excluded because they were pregnant or exempt from the FSP work registration requirement.

A participant between the ages of 18 and 50 might qualify to be excluded for more than one of these last four reasons. Our estimates reflect a hierarchical assignment, counting a participant under the first category for which he or she qualified, based on the order in which the exclusions are listed in PRWORA and in Table II.2. In reality, however, few states' automated systems capture all of the exclusions for which a client may qualify, so there is little flexibility to tabulate multiple exclusions or to order the exclusions in different ways. To illustrate the incidence of multiple exclusions, we analyzed Wisconsin caseload data, which identify pregnant women regardless of their other exclusions. Pregnant women accounted for 7.1 percent of all food stamp participants 18 to 50, but 0.23 percent had disabilities that prevented them from working, another 5.99 percent had dependent children, and an additional 0.37 percent were exempt from work registration for other reasons. Counting pregnant women under these other categories, which preceded pregnancy in the hierarchy of exclusions, meant that only 0.52 percent of Wisconsin participants 18 to 50 were excluded solely because they were pregnant.

To summarize how the exclusions, waivers and exemptions limit the fraction of participants subject to the ABAWD time limit, Figure II.1 shows the progression from the total participant

FIGURE II.1

ABAWD PARTICIPANTS IN RELATION TO THE ENTIRE FOOD STAMP CASELOAD,  
MARCH 2000



SOURCE: Counts provided by the states and supplemental estimates prepared by Mathematica Policy Research, Inc., from FSPQC data.

caseload, at the top, to the small subset of participants who were subject to the ABAWD time limit, in the lower right-hand corner. Expanding upon the breakdown in Table II.2, the figure divides the population of 18- to 50-year-old food stamp recipients into those residing in nonwaived areas and those residing in waived areas before applying the four additional exclusions. As we will show later, this division is useful for examining the impact of waivers on ABAWD participation in the FSP and for comparing states with respect to the relative frequency of ABAWDs in their client populations.

It is particularly noteworthy that ABAWDs accounted for a greater share of all participants 18 to 50 in waived areas than in nonwaived areas. This is evident from the counts reported in Figure II.1 but shown more explicitly in Table II.3. ABAWD participants were 11.5 percent of all participants 18 to 50 in waived areas compared with only 5.5 percent in nonwaived areas—a difference of two to one.

What accounts for this difference? There are three potentially important reasons. First, ABAWD participants in waived areas are not subject to termination if they fail to meet the work requirement. The lower percentage of ABAWD participants in nonwaived versus waived areas represents, in part, the cumulative impact of the time limit. Many of the areas that were waived in March 2000 had been waived since the ABAWD provisions first went into effect, so there have been no terminations due to the time limit. In other areas, the waivers are more recent. Participants may have been terminated earlier in these areas, but they are allowed to return to the program, and no additional terminations will occur as long as the waivers are in effect.

Second, the identification of ABAWD participants in waived areas may be less accurate than it is in nonwaived areas. In waived areas, there are no consequences associated with meeting the ABAWD definition, so the information requested of and provided by clients may understate the actual prevalence of circumstances that would qualify them to be excluded from

TABLE II.3  
COMPARATIVE FREQUENCY OF ABAWD PARTICIPANTS IN WAIVED AND  
NONWAIVED AREAS, MARCH 2000

Participant Subgroup	Areas without Waivers	Areas <i>with</i> Waivers	All Areas
ABAWD Participants Including the 15 Percent Exempt	232,000	190,500	422,500
All FSP Participants 18 to 50	4,224,700	1,662,100	5,886,800
ABAWD Participants As a Percentage of All Participants 18 to 50	5.5%	11.5%	7.2%

SOURCE: Counts provided by the states and supplemental estimates prepared by Mathematica Policy Research, Inc. from FSPQC data.

the ABAWD population. With fewer exclusions, a higher proportion of the population would be classified as ABAWD.

Third, nonwaived areas generally have stronger economies than waived areas. ABAWDs' participation in the labor force is likely to be more responsive to changes in the local economy than that of other clients (for example, elderly or disabled clients). Compared to ABAWDs in waived areas, then, ABAWDs in nonwaived areas may be more likely to find employment that would increase their income sufficiently to move them out of eligibility for the FSP.

#### **4. Additional Participants at Risk of Using Time-limited Benefits**

PRWORA excludes from the ABAWD population those Program participants who are exempt from the FSP work registration requirement. However, it is reasonable, for some analyses, to consider a portion of this group along with ABAWDs as being at risk of using time-limited benefits. Of particular interest are individuals exempted from the work registration requirement because they are complying with Social Security or Unemployment Compensation work requirements, attending school or training programs, working at least 30 hours per week, or

earning the equivalent of 30 times the minimum wage. What separates these participants from ABAWDs, statutorily, is simply their specific types—or quantities—of work activity. Without these or other qualifying work activities, they would be using up time-limited benefits.

There are a number of reasons why policymakers might want to consider at least some of these participants in common with the ABAWD population. First, some of them are in fact meeting the ABAWD work requirement, and taking them into account gives a more accurate representation of how many able-bodied adult participants without dependents are doing so. Second, the distinction between meeting the ABAWD work requirement and not being subject to it by virtue of meeting other work requirements is unimportant from an administrative standpoint. Administrative systems may not track with much accuracy the movement of participants between one status and the other. Third, participants working 30 hours or more or complying with other work requirements are at risk of losing their FSP benefits if their hours fall. A more complete estimate of participants who would be at risk of losing benefits if the economy weakened would include these individuals.

The number of participants who would be subject to the ABAWD time limit if they were not meeting other work requirements is non-trivial. Figure II.1 shows that a fairly large number of participants, especially in nonwaived areas, were excluded from the ABAWD population solely because they were exempt from FSP work registration. In fact, in nonwaived areas this group is larger than the number subject to the ABAWD time limit. The two most common reasons for exemption from work registration among participants who would otherwise be classified as ABAWDs were employment or meeting the work requirement of another program (Table II.4). More than a third (35.8 percent) of these participants in nonwaived areas and nearly half (44.3 percent) in waived areas were working at least 30 hours per week or earning at least 30 times the minimum wage. Another 28.3 percent in nonwaived areas and 13.5 percent in waived areas were meeting the work requirements under another program. Other reasons for exemption from the

TABLE II.4

## ABLE-BODIED PARTICIPANTS 18 TO 50 WITHOUT DEPENDENTS WHO ARE EXCLUDED FROM THE ABAWD POPULATION BECAUSE THEY ARE EXEMPT FROM WORK REGISTRATION, BY REASON

Reason for Exemption from Work Registration	Nonwaived Areas		Waived Areas		Total	
	Number	Percent	Number	Percent	Number	Percent
Total	320,300	100.0	119,500	100.0	439,700	100.0
Working 30 hours or more per week or earning 30 times the minimum wage	114,700	35.8	52,900	44.3	167,500	38.1
Meeting work requirements under another program	90,500	28.3	16,100	13.5	106,600	24.2
Student meeting the requirements for FSP eligibility	25,700	8.0	11,600	9.7	37,300	8.5
Responsible for caring for an incapacitated person	23,200	7.2	6,100	5.1	29,300	6.7
Participating in a drug addiction or alcohol treatment program	21,200	6.6	6,600	5.5	27,800	6.3
Other <sup>a</sup>	45,000	14.0	26,200	21.9	71,200	16.2

SOURCE: Counts provided by the states and supplemental estimates prepared by Mathematica Policy Research, Inc., from FSPQC data.

<sup>a</sup> Reasons often not specified but may include barriers to employment, such as a lack of transportation; the unavailability of E&T services in the county; or a temporary absence from employment.

work requirement—attending school, caring for an incapacitated person, participating in a treatment program—were much less common.

Policymakers might want to include those additional participants with work registration exemptions for working or meeting the work requirement of another program when estimating the number of ABAWD participants generally or the number engaged in work or work activity. Doing so would add 205,000 to the March 2000 count of ABAWD participants in nonwaived areas, representing a nearly 90 percent increase. In waived areas the impact would be smaller—both numerically and as a proportion of the ABAWD population. Participants with work registration exemptions for work or work activity totaled about 69,000 in March 2000 or about one-third the number in nonwaived areas. This is consistent with the relative number of 18 to 50 year-old participants in these areas, with waived areas having about one-third as many as nonwaived areas. But because ABAWDs are a larger share of adult participants in waived versus nonwaived areas, the proportionate impact would be smaller as well. The number of ABAWD participants in waived areas would be increased by about 36 percent compared to the nearly 90 percent increase in nonwaived areas.

## **B. STATE ESTIMATES OF THE NUMBER OF ABAWD PARTICIPANTS**

The states show considerable variation in the total number of Program participants identified as ABAWDs (including both waived and nonwaived areas) and the number of these who are subject to the ABAWD time limit—that is, living in nonwaived areas and not covered by a 15 percent exemption. While differences in population size account for most of this variation, two other factors play roles as well. First, as we will explore in Chapter III, states have made policy choices that affect what proportion of their food stamp participants meet the criteria that define an ABAWD. Second, the use of waivers reduces the number of ABAWDs who are subject to

the time limit but also appears to increase the total number of ABAWD participants in a state—by limiting the cumulative effect of the time limit.

Table II.5 reports state estimates of ABAWD participants in the FSP in March 2000. The total number of ABAWD participants in each state is disaggregated into those who were subject to the time limit, those who were living in nonwaived areas but were covered by a 15 percent exemption, and those who were living in waived areas.

The total number of ABAWDs in each state varied across a broad range. Five states—California, Illinois, New York, Pennsylvania, and Texas—had more than 25,000 ABAWD participants while another eight states had more than 10,000. At the bottom end, eight states had fewer than 1,000 ABAWD participants while 29 states and D.C. had between 1,000 and 10,000. Estimates of the number of ABAWD participants who were subject to the time limit show the substantial impact of waivers and the lesser impact of 15 percent exemptions. Twenty states had more ABAWDs in waived areas than ABAWDs subject to the time limit, but only four states applied the 15 percent exemption to more than half their ABAWDs in nonwaived areas.<sup>2,3</sup> Altogether 18 states had fewer than 1,000 ABAWD participants who were subject to the time limit while only five states had more than 10,000. Notably, more than one in four of the nation's ABAWDs who were subject to the time limit lived in California, which had no waived areas in March 2000.

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<sup>2</sup> Illinois and Arkansas use the 15 percent exemption to exempt all ABAWDs living in areas that are not covered by waivers (in both states, most of the ABAWD population is waived). Both states apply the 15 percent exemption, correctly, to just those ABAWDs in nonwaived areas who are not meeting the work requirement, but in reality no one in either state must comply with the ABAWD work requirement as a condition for continued receipt of benefits. For this reason, in Table II.5 we have included in the 15 percent exemption column *all* Illinois and Arkansas ABAWDs who were living in nonwaived areas.

<sup>3</sup> Missouri and Tennessee use the 15 percent exemption to extend two additional months of time-limited benefits to those ABAWDs who need them, effectively changing the time limit from three months to five months (see Chapter III). Those who receive the additional months of benefits remain subject to the time limit, and this is how we count them in Table II.5. Neither state reported estimates of the number of ABAWDs who were receiving their fourth or fifth month of time-limited benefits.



TABLE II.5

## ESTIMATED NUMBER OF ABAWD PARTICIPANTS BY STATE, MARCH 2000

State	Total	ABAWDs in Nonwaived Areas		
		ABAWDs Subject to the Time Limit	ABAWDs Excluded Under the 15 Percent Exemption	ABAWDs in Waived Areas
U.S. Total	422,500	215,800	16,200	190,500
Alabama	4,241	2,302	0	1,939
Alaska	1,440	573	7	860
Arizona	13,406 *	7,029	240	6,137 *
Arkansas	9,562 *	0	3,240 *	6,322 *
California	55,614	55,358	256	0
Colorado	2,058	1,707	77	274
Connecticut	8,073 *	370 *	475	7,228 *
Delaware	672 *	672 *	0	0
District of Columbia	6,907 *	0	0	6,907 *
Florida	8,993	1,688	700	6,605
Georgia	10,405	2,664	1	7,740
Hawaii	2,689 *	1,353	31	1,305 *
Idaho	276 *	216	60	0 *
Illinois	34,422	0	4,571	29,851
Indiana	2,518	1,806	11	701
Iowa	1,388	1,388	0	0
Kansas	2,611	2,174	437	0
Kentucky	13,693 *	2,694	670	10,329 *
Louisiana	15,210	1,337	865	13,008
Maine	719 *	222	42	455 *
Maryland	5,551	1,180	149	4,222
Massachusetts	2,469 *	2,159 *	310	0
Michigan	16,644	16,644	0	0
Minnesota	5,822	4,282	102	1,438
Mississippi	1,460	1,160	300	0
Missouri	5,981 *	4,376 *	118	1,487 *
Montana	1,266 *	581 *	0	685 *
Nebraska	825 *	674 *	111	40 *
Nevada	999	774	9	216
New Hampshire	94 *	52 *	42	0
New Jersey	8,208	1,339	194	6,675
New Mexico	2,564	1,073	0	1,491
New York	28,029	25,413	495	2,121
North Carolina	6,681 *	5,348 *	1,333	0
North Dakota	597 *	404	0	193 *
Ohio	10,844	10,844	0	0
Oklahoma	4,081	4,081	0	0
Oregon	8,303	8,072	231	0
Pennsylvania	33,176	3,777	222	29,177
Rhode Island	1,769	286	0	1,483
South Carolina	4,173	2,077	455	1,641
South Dakota	1,279 *	400	0	879 *
Tennessee	10,534 *	3,447 *	0	7,087 *
Texas	35,531	16,435	0	19,096
Utah	1,014 *	952 *	6	56 *
Vermont	1,628	1,381	1	246
Virginia	12,761	7,801	0	4,960
Washington	4,891 *	3,604	371	916 *
West Virginia	7,668	967	20	6,681
Wisconsin	2,225	2,225	0	0
Wyoming	557 *	472	0	85 *

SOURCE: Counts provided by the states and supplemental estimates prepared by Mathematica Policy Research, Inc., from FSPQC and Form FNS 583 data.

\* Denotes sample estimate. Estimates for Texas are based on an administrative file containing approximately 70 percent of the full March caseload and have been adjusted accordingly.

From another perspective, there were also substantial differences among the states in the proportion of participants age 18 to 50 who were subject to the ABAWD time limit. Nationally, this proportion was 3.7 percent in March 2000 (Table II.6). Among the states, it varied from a low of 0 percent in Arkansas, D.C., and Illinois to a high of 9.6 percent in California. Altogether four states had proportions that were more than twice the national average while 20 states had proportions that were less than half the national average.

Consistent with the national pattern, in nearly every state with waived areas, the proportion of 18- to 50-year-old participants in those areas who were identified as ABAWDs was markedly larger than the proportion of 18- to 50-year-olds identified as ABAWDs in *nonwaived* areas (Table II.7). Of the 36 states with waived areas, only two—New York and Washington—had smaller ratios of ABAWD participants to all participants 18 to 50 in their waived versus nonwaived areas.<sup>4</sup>

Nevertheless, the proportion of 18- to 50-year-olds identified as ABAWDs varied across a broad range *within* the waived and nonwaived areas. In nonwaived areas, the percentage of all participants 18 to 50 who were identified as ABAWDs varied from less than 2 percent in the lowest six states (Florida, Idaho, Indiana, Maine, Mississippi, and New Hampshire) to more than 8 percent in the top six (Arizona, Arkansas, California, Oregon, Vermont, and Virginia). In waived areas, the fraction of participants 18 to 50 who were identified as ABAWDs varied from 5 percent or less in the lowest six states (Florida, Maine, New Mexico, New York, Utah, and Washington) to nearly 20 percent or more in the top four states (Arizona, D.C., Minnesota, and Virginia). While the fractions in waived areas vary across a broader range than the fractions in nonwaived areas, the two distributions have the same spread when we correct for their different

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<sup>4</sup> We exclude D.C. because it was entirely waived.

TABLE II.6

ABAWD PARTICIPANTS SUBJECT TO THE TIME LIMIT AS A PERCENTAGE  
OF ALL PARTICIPANTS 18 TO 50, BY STATE, MARCH 2000

State	Total	ABAWDs in Nonwaived Areas		
		ABAWDs Subject to the Time Limit	ABAWDs Excluded Under the 15 Percent Exemption	ABAWDs in Waived Areas
U.S. Total	422,500	215,800	16,200	190,500
Alabama	4,241	2,302	0	1,939
Alaska	1,440	573	7	860
Arizona	13,406 *	7,029	240	6,137 *
Arkansas	9,562 *	0	3,240 *	6,322 *
California	55,614	55,358	256	0
Colorado	2,058	1,707	77	274
Connecticut	8,073 *	370 *	475	7,228 *
Delaware	672 *	672 *	0	0
District of Columbia	6,907 *	0	0	6,907 *
Florida	8,993	1,688	700	6,605
Georgia	10,405	2,664	1	7,740
Hawaii	2,689 *	1,353	31	1,305 *
Idaho	276 *	216	60	0 *
Illinois	34,422	0	4,571	29,851
Indiana	2,518	1,806	11	701
Iowa	1,388	1,388	0	0
Kansas	2,611	2,174	437	0
Kentucky	13,693 *	2,694	670	10,329 *
Louisiana	15,210	1,337	865	13,008
Maine	719 *	222	42	455 *
Maryland	5,551	1,180	149	4,222
Massachusetts	2,469 *	2,159 *	310	0
Michigan	16,644	16,644	0	0
Minnesota	5,822	4,282	102	1,438
Mississippi	1,460	1,160	300	0
Missouri	5,981 *	4,376 *	118	1,487 *
Montana	1,266 *	581 *	0	685 *
Nebraska	825 *	674 *	111	40 *
Nevada	999	774	9	216
New Hampshire	94 *	52 *	42	0
New Jersey	8,208	1,339	194	6,675
New Mexico	2,564	1,073	0	1,491
New York	28,029	25,413	495	2,121
North Carolina	6,681 *	5,348 *	1,333	0
North Dakota	597 *	404	0	193 *
Ohio	10,844	10,844	0	0
Oklahoma	4,081	4,081	0	0
Oregon	8,303	8,072	231	0
Pennsylvania	33,176	3,777	222	29,177
Rhode Island	1,769	286	0	1,483
South Carolina	4,173	2,077	455	1,641
South Dakota	1,279 *	400	0	879 *
Tennessee	10,534 *	3,447 *	0	7,087 *
Texas	35,531	16,435	0	19,096
Utah	1,014 *	952 *	6	56 *
Vermont	1,628	1,381	1	246
Virginia	12,761	7,801	0	4,960
Washington	4,891 *	3,604	371	916 *
West Virginia	7,668	967	20	6,681
Wisconsin	2,225	2,225	0	0
Wyoming	557 *	472	0	85 *

SOURCE: Counts provided by the states and supplemental estimates prepared by Mathematica Policy Research, Inc., from FSPQC and Form FNS 583 data.

\* Denotes sample estimate. Estimates for Texas are based on an administrative file containing approximately 70 percent of the full March caseload and have been adjusted accordingly.

TABLE II.7

COMPARATIVE FREQUENCY OF ABAWD PARTICIPANTS IN WAIVED AND NONWAIVED AREAS,  
BY STATE, MARCH 2000

State	Nonwaived Areas		Waived Areas	
	Number of ABAWDs	Percent of Participants 18 to 50	Number of ABAWDs	Percent of Participants 18 to 50
U.S. Total	232,000	5.5	190,500	11.5
Alabama	2,302	2.3	1,939	6.1
Alaska	580	6.0	860	13.4
Arizona	7,269	13.8	6,137 *	20.0
Arkansas	3,240	8.7	6,322 *	13.1
California	55,614	9.6	0	--
Colorado	1,784	4.3	274	18.2
Connecticut	845 *	4.9	7,228 *	15.8
Delaware	672 *	5.5	0	--
District of Columbia	0	--	6,907 *	22.5
Florida	2,388	1.9	6,605	5.0
Georgia	2,665	2.5	7,740	10.5
Hawaii	1,384	4.6	1,305 *	9.4
Idaho	276	1.5	0 *	--
Illinois	4,571	4.7	29,851	15.3
Indiana	1,817	1.8	701	7.2
Iowa	1,388	2.9	0	--
Kansas	2,611	6.0	0	--
Kentucky	3,364	4.6	10,329 *	12.0
Louisiana	2,202	3.4	13,008	13.9
Maine	264	1.4	455 *	2.7
Maryland	1,329	3.9	4,222	9.6
Massachusetts	2,469 *	3.0	0	--
Michigan	16,644	7.1	0	--
Minnesota	4,384	6.7	1,438	24.3
Mississippi	1,460	1.8	0	--
Missouri	4,494 *	3.5	1,487 *	5.7
Montana	581 *	3.8	685 *	7.5
Nebraska	785 *	2.7	40 *	5.7
Nevada	783	4.2	216	11.9
New Hampshire	94 *	0.7	0	--
New Jersey	1,533	5.6	6,675	8.7
New Mexico	1,073	3.8	1,491	4.9
New York	25,908	6.2	2,121	3.3
North Carolina	6,681 *	3.9	0	--
North Dakota	404	4.2	193 *	12.7
Ohio	10,844	5.0	0	--
Oklahoma	4,081	4.8	0	--
Oregon	8,303	8.6	0	--
Pennsylvania	3,999	4.0	29,177	14.5
Rhode Island	286	2.4	1,483	9.2
South Carolina	2,532	3.7	1,641	5.4
South Dakota	400	3.8	879 *	14.2
Tennessee	3,447 *	2.9	7,087 *	12.8
Texas	16,435	6.0	19,096	13.9
Utah	958 *	3.4	56 *	4.7
Vermont	1,382	9.1	246	16.0
Virginia	7,801	8.5	4,960	19.7
Washington	3,975	5.7	916 *	2.1
West Virginia	987	3.3	6,681	9.9
Wisconsin	2,225	3.5	0	--
Wyoming	472	6.0	85 *	7.5

SOURCE: Counts provided by the states and supplemental estimates prepared by Mathematica Policy Research, Inc., from FSPQC data.

\* Denotes sample estimate. Estimates for Texas are based on an administrative file containing approximately 70 percent of the full March caseload and have been adjusted accordingly.

mean values. A common statistic for expressing the variability of a distribution in a uniform metric, the “coefficient of variation,” calculated by dividing the standard deviation of a distribution by its mean, yields the same value for both distributions (.5).

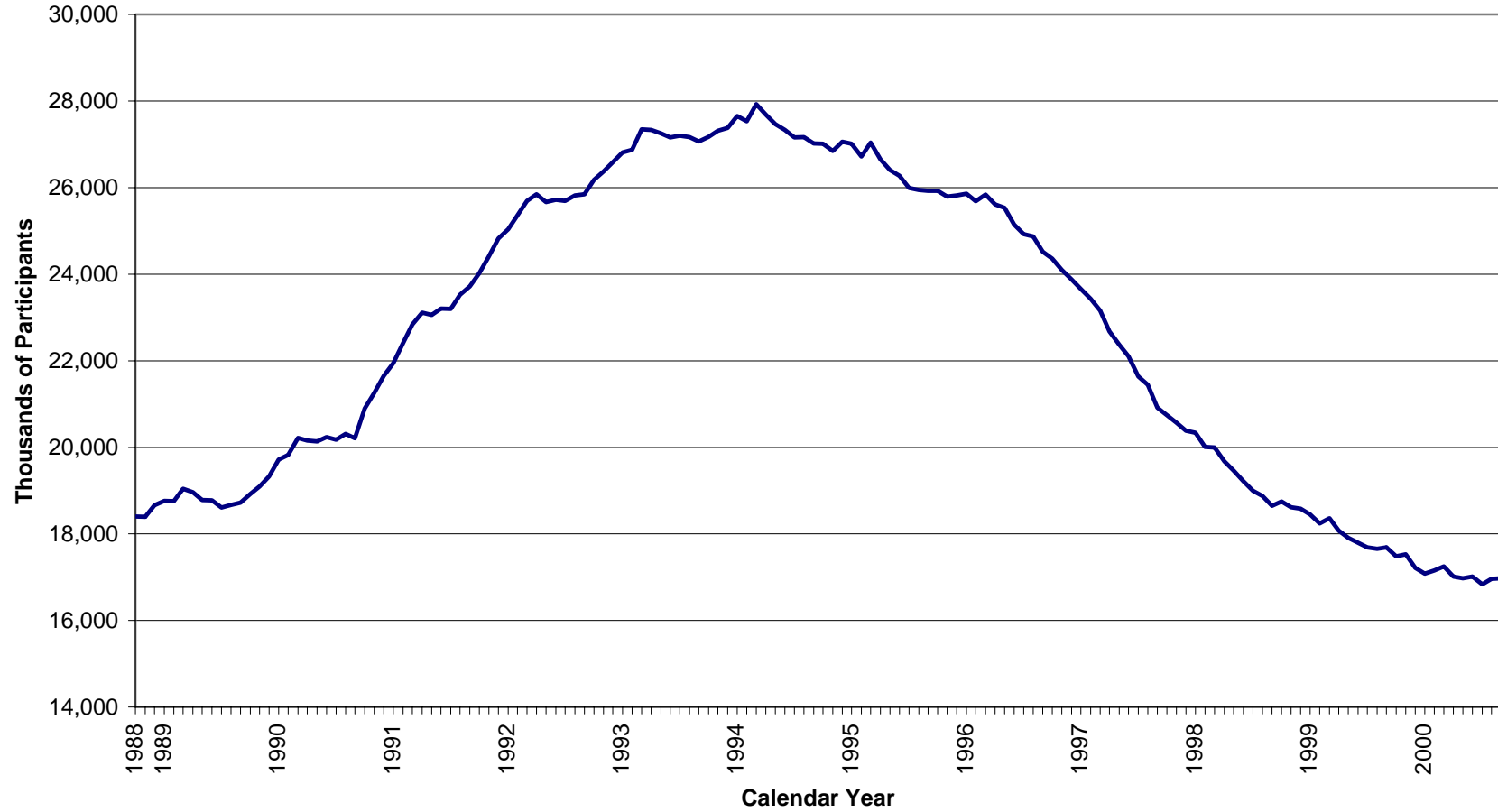
Several factors may contribute to these state-to-state differences in the relative frequency of ABAWD participants in the 18 to 50 population within waived and nonwaived areas. State policies regarding the definition of ABAWDs and how states implement their policies will account for a portion of these differences. Variation in the demographic characteristics and health of the population, by affecting who is potentially eligible to be exempted, will contribute to the differences as well. In nonwaived areas, the relative number of ABAWD participants may be affected by the extent to which ABAWDs are able to meet the work requirement and *how* they are able to do so. Other things being equal, as the proportion of ABAWDs who meet the work requirement rises, the proportion using up their time-limited benefits falls. State-to-state variation in economic conditions will contribute to variation in the proportion of ABAWDs meeting the work requirement through employment while variation in the availability of qualifying work activities will affect the proportion of ABAWDs who can meet the work requirement *without* finding employment. Finally, sampling error affects some of the estimates, and measurement error in the identification or counting of ABAWDs affects potentially many more. Subsequent chapters will discuss some of these issues in greater detail.

### **C. TRENDS IN PARTICIPATION OVER TIME**

While the ABAWD provisions were expected to have a direct, downward impact on the number of food stamp participants who are ultimately subject to them, they were implemented in an environment in which other major changes were taking place, including, most importantly, welfare reform and an expanding economy. A decline in FSP participation was well under way before the ABAWD provisions took effect, heralding the end of an unprecedented period of

FIGURE II.2

NUMBER OF PARTICIPANTS IN THE FOOD STAMP PROGRAM,  
OCTOBER 1988 THROUGH SEPTEMBER 2000



SOURCE: FNS Program Operations data.

growth in the food stamp caseload. Caseloads peaked in March 1994 following a steep rise that began in late 1989 (Figure II.2). From a zenith of 28 million, the number of participants in the United States dropped by more than 4 million—a reduction of 15 percent—before the ABAWD provisions went into effect in November and December of 1996. The rate of decline began to slow in late 1997, and by early 1999 the number of participants dropped below the level of 10 years earlier, completing a remarkable turnaround. The participation figures through late 2000 suggest that the decline has run its course. The earlier, dramatic downward movement in FSP participation and the more gradual leveling off in recent years provide an important context in which to view trends in ABAWD participation over time. We offer, here, an assessment of how much the number of ABAWD participants is likely to have increased or decreased in the absence of PRWORA.

Using data collected as part of the annual QC sample, we simulated the national ABAWD population as participants who were:

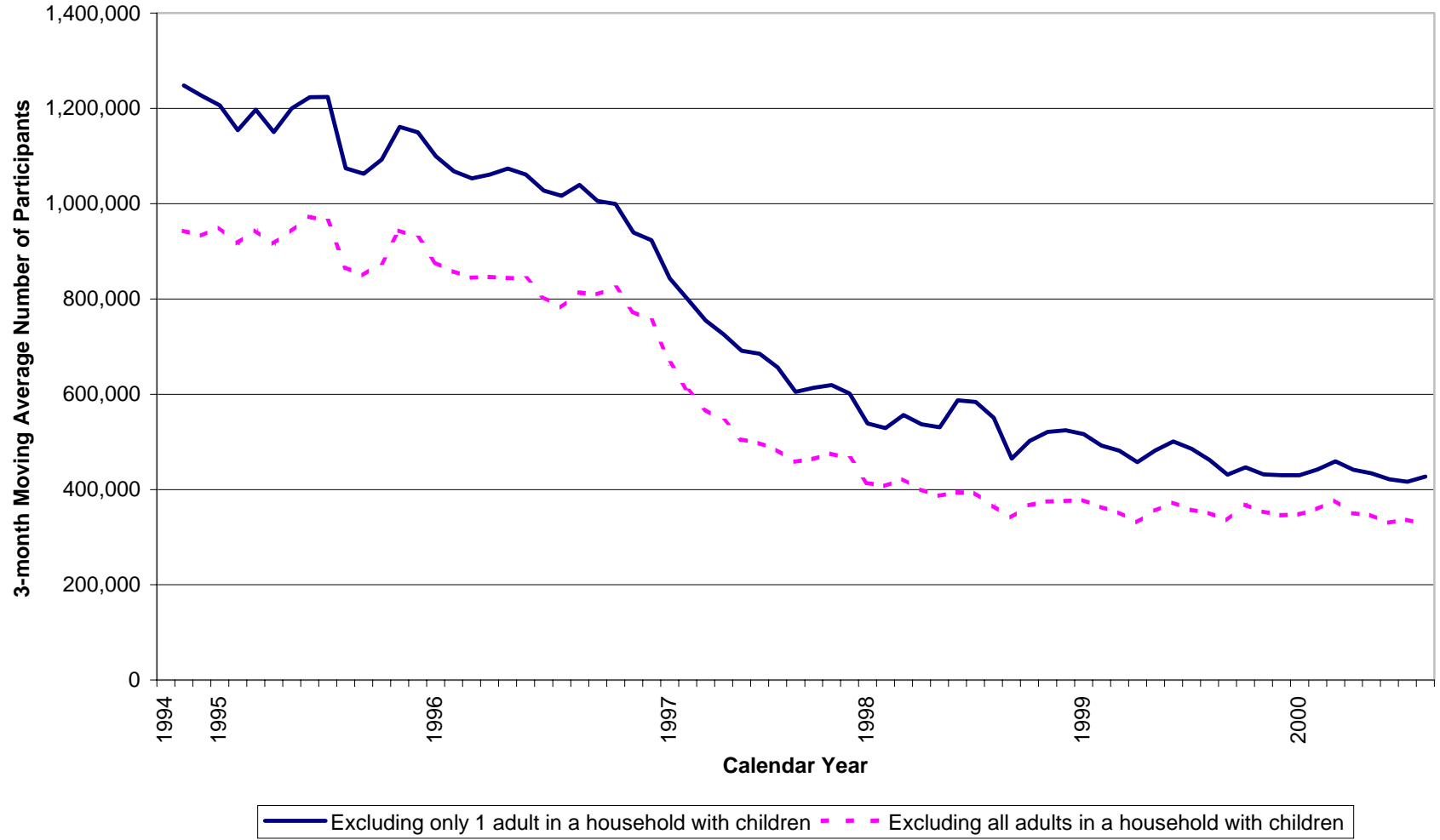
- Above the age of 17 and under the age of 50
- Neither receiving disability benefits nor exempt from FSP work registration
- Members of a food stamp household containing no children under 18

A second simulation modified this last criterion to exclude only one adult member in households with children—as some states have done. This approach yields a higher number of ABAWDs that falls closer to our March 2000 estimate than does the first approach. To reduce the impact of sampling error, we calculated three-month moving averages, which are assigned to the middle month of each triplet. For example, the December 1996 figure is an average of the November 1996, December 1996, and January 1997 estimates.

Figure II.3 shows the trend in the number of simulated ABAWD food stamp participants from October 1994 through September 2000. The two simulations show little change through

FIGURE II.3

ALTERNATIVE SIMULATIONS OF ABAWD PARTICIPANTS IN THE FOOD STAMP PROGRAM,  
OCTOBER 1994 THROUGH SEPTEMBER 2000



SOURCE: Mathematica Policy Research, Inc., from FSPQC data.



about mid-1995 but then display a consistent, if slow, decline, falling by about 17 percent over the next 18 months, before the ABAWD provisions went into effect. The number of ABAWD participants then fell by about 40 percent over the next 12 months, or between 300,000 and 400,000 depending on the simulation. Much of that decline occurred during the initial two to three months of ABAWD terminations, beginning in February 1997.<sup>5</sup> From October 1997 the decline continued at a considerably reduced pace for another 12 to 24 months, depending on the series. Since late 1998 (lower series) or late 1999 (upper series) the decline appears to have ceased altogether.

In late 1999, 36 months after the ABAWD provisions were implemented, most of the ABAWDs who used up their time-limited benefits during the initial implementation of the ABAWD provisions would have regained eligibility.<sup>6</sup> Yet Figure II.3 provides no indication that these earlier participants returned to the program as ABAWDs. Where have they gone? Has there been no recurrence of their earlier needs for food assistance, or have their needs been addressed in some other manner? Have they changed their status such that they are no longer counted as ABAWDs, or have they simply become discouraged with the FSP and chosen not to return? These are important questions to address if we are to understand the full impact of the ABAWD provisions, but this study was not intended to answer them.

Whatever may have happened to the ABAWD population after 1999, there is clear evidence that the ABAWD participant population experienced a much greater decline up to that point than

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<sup>5</sup> With three-month moving averages, the February 1997 caseloads contribute to the January, February, and March estimates. In other words, the estimates lead the actual caseload changes by one month.

<sup>6</sup> Regardless of whether a state elected to use a fixed clock or a rolling clock to define the 36-month period (see Chapter III), participants who used up their time-limited benefits three months after the ABAWD provisions went into effect would have started a new 36-month clock and become eligible, once again, for three months of benefits in November or December 1999.

the entire food stamp caseload. Figure II.4 compares the recent trends among all FSP participants and ABAWD participants (based on the higher simulated number), with each series expressed as a percentage of its October 1994 level.<sup>7</sup> Thus the two series begin at a common point (100 percent) but then diverge. Even before the ABAWD provisions went into effect in November and December 1996, the ABAWD participant population showed evidence of a slightly more rapid rate of decline than the all-participants series. With the implementation of the ABAWD provisions, the ABAWD series began to decline much more steeply than the all-participants series, and it continued to do so for about a year. By the end of 1998, the number of ABAWD participants had dropped to barely more than 40 percent of the October 1994 level while the all-participants series fell to about 75 percent of the October 1994 level. The rate of decline in the ABAWD series then slowed to a level that roughly matched the continuing rate of decline in the all-participants series. The ABAWD series appears to have stopped declining before the all-participants series, but by late 2000, both series appear to have bottomed out, with the all-participants series standing at 62 percent of its October 1994 level and the ABAWD series at about 36 percent of its October 1994 level.

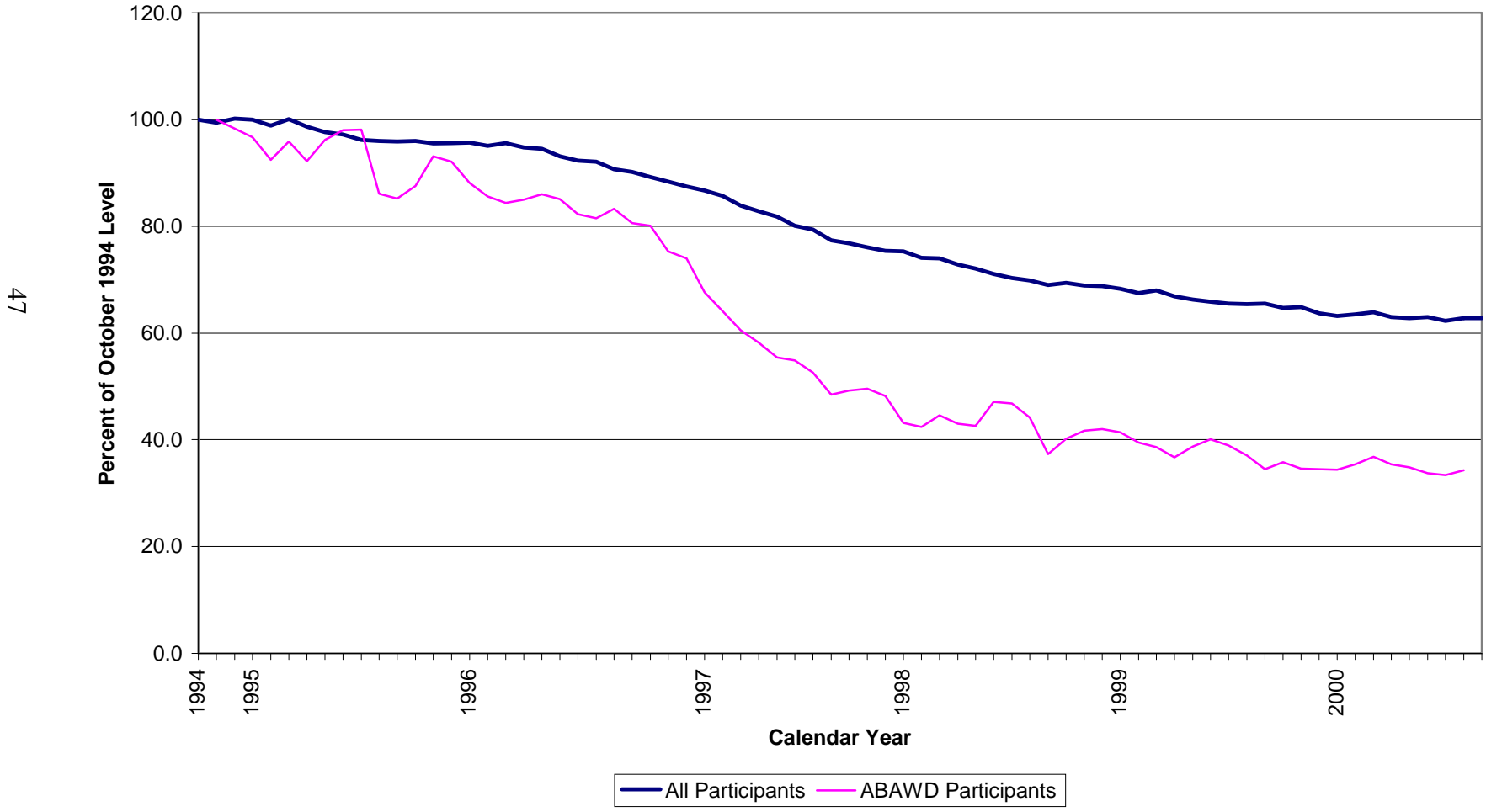
Based on the rate at which the decline in the ABAWD caseload accelerated when the ABAWD provisions went into effect, we would infer that the ABAWD provisions clearly contributed to a net reduction in the number of ABAWDs participating in the FSP. However, this reduction occurred during a time when the overall number of FSP participants was also declining at an accelerated rate. While the number of ABAWD participants dropped from about 80 percent of its October 1994 level to less than 50 percent of the October 1994 level—a 40 percent decline—over the 12-month period from late 1996 through late 1997, there was a 15

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<sup>7</sup> Both of the participation series are expressed as three-month moving averages. The first month, then, represents an average of October, November, and December 1994.

FIGURE II.4

ALL PARTICIPANTS AND ABAWD PARTICIPANTS, OCTOBER 1994 TO SEPTEMBER 2000,  
AS A PERCENTAGE OF OCTOBER 1994 LEVEL



SOURCE: FNS Program Operations data and FSPQC sample files, FY95 through FY00.

percent decline among all participants during this same period. If ABAWDs resembled FSP participants generally in their response to the conditions that produced the decline in the FSP caseload, we would expect that in the absence of the ABAWD provisions the number of ABAWD participants would have declined by the same 15 percent. But given the evidence of a somewhat more rapid rate of decline among ABAWDs before the implementation of these provisions, it appears likely that ABAWD participation would have declined by *more* than 15 percent over this period even if the ABAWD provisions had not been implemented. This suggests that other factors may have caused at least half of the 40 percent decline in the number of ABAWD participants the first year.

#### **D. MEETING THE WORK REQUIREMENT**

ABAWDs who are subject to the time limit may continue to receive benefits if they meet the associated work requirement. This can be done by working 20 or more hours per week, participating in workfare for the specified number of hours, or by participating for 20 or more hours per week in a qualifying work activity. In this section we present both national and state estimates of the number and proportion of ABAWD participants subject to the time limit who were meeting the work requirement in March 2000. These estimates are disaggregated by the ways in which participants were meeting the work requirement.

##### **1. Previous Research**

There have been few attempts to estimate the fraction of participants subject to the time limit who were meeting the work requirement in a given month and, therefore, losing no months of eligibility. With data from FY96, the year before PRWORA was implemented, Stavrianos and Nixon (1998) estimated that only about 50,000 or barely more than 5 percent of the 941,000 participants whom they identified as ABAWDs were meeting the work requirement as it was later established under PRWORA. Of this number, 44,000 were working 20 or more hours per

week, and 6,000 were participating in workfare. Stavrianos and Nixon could not estimate from FSPQC data how many additional participants would have met the work requirement through other qualifying work activities. Nor could they distinguish between participants in areas that were later waived from the time limit and those in areas that became subject to the limit. Nevertheless, their findings provide a useful benchmark for later efforts to examine the degree to which participants have been able to satisfy the ABAWD work requirement.

Using data supplied by 24 states, the GAO (1998) estimated that in April, May, and June 1998 an average of 8,000 ABAWDs held workfare positions and another 15,600 were enrolled in other qualifying work activities. These participants accounted for 17 percent of those who were subject to the time limit in the 24 states. This estimate excludes those who met the work requirement through employment, whom Stavrianos and Nixon (1998) found to be far more numerous than those participating in workfare (but at a time when workfare was less common). It is likely, then, that the 17 percent figure understates by a substantial margin the proportion of those subject to the time limit who were in fact meeting the work requirement, implying an even greater increase over the 5 percent fraction estimated by Stavrianos and Nixon with 1996 data. Furthermore, the 24 states contributing to the GAO estimate do not include California and New York, which account for most of the workfare participation by ABAWDs, as we show below.

Beginning in October 1998, states that elected to use any of the federal E&T funds appropriated for ABAWDs were required to report to FNS each quarter the number of ABAWD participants enrolled in education, training, workfare and other work programs, separately for waived and nonwaived areas. Because these reports exclude counts of participants meeting the work requirement through employment or other qualifying activities not covered by federal E&T funds, they provide us with only a lower-bound estimate of the number of ABAWD participants in nonwaived areas who were meeting the work requirement. Based on data that all the states submitted to FNS on Form 583, the GAO (2001) reported that in FY2000 the average monthly

number of ABAWDs subject to the time limits and meeting the work requirement through workfare and other work programs was 49,300 and the number meeting the work requirement through education and training was 9,200. These findings reflect a substantial increase in the use of workfare since the year before PRWORA took effect.<sup>8</sup> But as with the earlier GAO estimates, they exclude the number of ABAWDs who were meeting the work requirement through employment. We address this limitation with our estimates for March 2000.

## **2. Number Meeting the Work Requirement**

We would expect state data on the number of ABAWD participants meeting the work requirement to be rather strong, given the time limits that states must impose upon those participants who fail to meet the requirement. Yet many states were unable to extract this information from their state data systems. As a result, we had to rely on a combination of Form 583 and FSPQC sample data for more than half of the states in order to construct the national estimates that we sought (see Appendix B).

Table II.8 presents by state and for the nation the estimated number of ABAWDs who were subject to the time limit and both and number and percentage of these who were meeting the work requirement. Nationally, 110,000, or 51 percent, of the 215,800 participants who were subject to the ABAWD time limit were meeting the work requirement. This implies that about half of the participants who were subject to the time limit were at risk of losing their benefits in the next two months unless they started participating in a qualifying work activity.

The proportion of participants who were meeting the work requirement varied substantially across the states. It ranged from a low of 0.5 percent, reported by Maryland, to a high of 100 percent, reported by Mississippi. Only 12 states lay within 10 percentage points of the national

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<sup>8</sup> It is likely that nearly all of the increase over GAO's 1998 estimate is due to the inclusion of the 26 states that were excluded from the earlier estimate—especially California and New York.

TABLE II.8

## STATE ESTIMATES OF ABAWD PARTICIPANTS SUBJECT TO THE TIME LIMIT AND MEETING THE WORK REQUIREMENT, MARCH 2000

State	Number of ABAWDs Subject to the Time Limit	Number Meeting the Work Requirement	Percent Meeting the Work Requirement
U.S. Total	215,800	110,000	51.0
Alabama	2,302	1,006 *	43.7
Alaska	573 *	238	41.5
Arizona	7,029 *	3,677	52.3
Arkansas	0	0	--
California	55,358	36,308 *	65.6
Colorado	1,707	730	42.8
Connecticut	370 *	123 *	33.2
Delaware	672 *	134 *	19.9
District of Columbia	0	0	--
Florida	1,688 *	563 *	33.4
Georgia	2,664 *	963 *	36.1
Hawaii	1,353	248	18.3
Idaho	216	84	38.9
Illinois	0	0	--
Indiana	1,806	390	21.6
Iowa	1,388	407 *	29.3
Kansas	2,174	443	20.4
Kentucky	2,694	1,295	48.1
Louisiana	1,337	389 *	29.1
Maine	222	48	21.6
Maryland	1,180	6	0.5
Massachusetts	2,159 *	353 *	16.4
Michigan	16,644	3,467	20.8
Minnesota	4,282	946 *	22.1
Mississippi	1,160 *	1,160 *	100.0
Missouri	4,376 *	370 *	8.5
Montana	581 *	394 *	67.8
Nebraska	674 *	181 *	26.9
Nevada	774	64	8.3
New Hampshire	52 *	46 *	88.5
New Jersey	1,339	1,272 *	95.0
New Mexico	1,073 *	17 *	1.6
New York	25,413	23,848 *	93.8
North Carolina	5,348 *	1,659 *	31.0
North Dakota	404	162	40.1
Ohio	10,844 *	1,194	11.0
Oklahoma	4,081	163	4.0
Oregon	8,072	7,637	94.6
Pennsylvania	3,777 *	515	13.6
Rhode Island	286	61	21.3
South Carolina	2,077	1,143	55.0
South Dakota	400	179	44.8
Tennessee	3,447	2,037	59.1
Texas	16,435	8,676	52.8
Utah	952 *	273 *	28.7
Vermont	1,381	444	32.2
Virginia	7,801	4,358	55.9
Washington	3,604 *	897	24.9
West Virginia	967	477 *	49.3
Wisconsin	2,225	721	32.4
Wyoming	472	262	55.5

SOURCE: Counts provided by the states and supplemental estimates prepared by Mathematica Policy Research, Inc., from FSPQC data. See Appendix B for details.

\* Denotes sample estimate. Estimates for Texas are based on an administrative file containing approximately 70 percent of the full March caseload and have been adjusted accordingly.

average while another 10 states lay within 20 percentage points. With many of the state estimates being based at least in part on sample data, however, these estimates tend to overstate the true variation around the mean.

Recall that participants who work more than 30 hours a week or who comply with the work requirement of another entitlement program are defined as exempt from food stamp work registration and therefore not subject to the ABAWD time limit. We suggested earlier that policymakers might be interested in knowing how the number of ABAWD participants and the percentage meeting the work requirement in nonwaived areas would change if such persons were included. We estimated from the results presented in Tables II.4 and II.8 that including those working 30 hours or more would raise the estimated proportion meeting the work requirement to 68 percent. The work requirements under Unemployment Compensation and Social Security do not involve activities, generally, that would satisfy the ABAWD work requirement. Rather, they resemble the FSP work registration requirement that all ABAWDs—and many other FSP participants—must satisfy even if they do not meet the ABAWD work requirement. But if the intent is to estimate what fraction of able-bodied adult FSP participants are avoiding time-limited benefits by complying with a work requirement of any kind, then it may be appropriate to include these additional participants, which raises the proportion to 75 percent. Counting them, instead, as able-bodied adults who are *not* meeting the ABAWD requirement lowers the proportion to 53 percent. Under any of these scenarios, however, the number of Program participants who were in fact using up time-limited benefits in March 2000 remains unchanged at 106,000.

### **3. Ways of Meeting the Work Requirement**

Employment was the most common activity by which participants met the work requirement, followed by workfare (Table II.9). About 46 percent of participants who were



TABLE II.9

## METHOD OF MEETING THE WORK REQUIREMENT: ABAWD PARTICIPANTS SUBJECT TO THE TIME LIMIT, MARCH 2000

Method of Meeting the Work Requirement	Number	Percent
Total	110,000	100.0
Working 20 Hours Per Week	50,600	46.0
Participating in Workfare	50,400	45.8
Participating in Education and Training	7,700	7.0
Participating in Another Qualifying Activity	1,300	1.2

SOURCE: Counts provided by the states and supplemental estimates prepared by Mathematica Policy Research, Inc., from FSPQC and Form FNS-583 data.

subject to the ABAWD time limit and meeting the work requirement were employed for at least 20 hours per week (but less than 30). Another 46 percent participated in workfare. Just 7 percent participated in education and training. Finally, 1 percent was engaged in other qualifying activities. Only four states—Indiana, Michigan, Nevada and Wisconsin—reported any enrollment in this last category, and only Michigan reported an appreciable amount, which accounted for nearly all the national total. Michigan identified these other activities as self-initiated community service, which made up the vast majority of the category, and the former JTPA program.

While workfare was as common as working nationally, ABAWD participants who were meeting the work requirement were more likely to be working than participating in workfare in all but 10 states (Tables II.10 and II.11). For each state, Table II.10 presents the number of ABAWD participants who were both subject to the time limit and meeting the work requirement and then breaks down this total by the way in which participants were meeting the work requirement. Table II.11 provides a percentage breakdown of the ABAWD participants who

TABLE II.10

STATE ESTIMATES OF ABAWD PARTICIPANTS MEETING THE WORK REQUIREMENT, BY METHOD,  
MARCH 2000

State	Number Meeting the Work Requirement	Percent Meeting the Work Requirement, by Method			
		Working	Workfare	Education and Training	Other Qualifying Activity
U.S. Total	110,000	46.0	45.8	7.0	1.2
Alabama	1,006 *	45.0 *	55.0	0.0	0.0
Alaska	238	75.2 *	24.8	0.0	0.0
Arizona	3,677	94.5	5.5	0.0	0.0
Arkansas	0	--	--	--	--
California	36,308 *	33.6 *	61.3	5.1	0.0
Colorado	730	7.1	68.1	24.8	0.0
Connecticut	123 *	63.4 *	12.2	24.4	0.0
Delaware	134 *	98.5 *	1.5	0.0	0.0
District of Columbia	0	--	--	--	--
Florida	563 *	74.4 *	19.7	5.9	0.0
Georgia	963 *	79.5 *	17.9	2.6	0.0
Hawaii	248	98.0 *	0.0	2.0	0.0
Idaho	84	23.8 *	75.0	1.2	0.0
Illinois	0	--	--	--	--
Indiana	390	39.0	0.0	43.3	17.7
Iowa	407 *	100.0 *	0.0	0.0	0.0
Kansas	443	100.0	0.0	0.0	0.0
Kentucky	1,295	56.5	0.0	43.5	0.0
Louisiana	389 *	87.4 *	11.3	1.3	0.0
Maine	48	85.4	12.5	2.1	0.0
Maryland	6	100.0	0.0	0.0	0.0
Massachusetts	353 *	70.0 *	30.0	0.0	0.0
Michigan	3,467	43.6	0.0	21.3	35.1 <sup>a</sup>
Minnesota	946 *	72.2 *	2.6	25.2	0.0
Mississippi	1,160	12.8	85.9	0.0	1.2
Missouri	370 *	89.7 *	0.0	10.3	0.0
Montana	394 *	0.0 *	0.0	100.0	0.0
Nebraska	181 *	85.1 *	14.9	0.0	0.0
Nevada	64	54.7 *	4.7	37.5	3.1
New Hampshire	46 *	0.0 *	87.0	13.0	0.0
New Jersey	1,272 *	31.4 *	12.3	56.3	0.0
New Mexico	17 *	58.8 *	0.0	41.2	0.0
New York	23,848 *	6.5 *	90.2	3.4	0.0
North Carolina	1,659 *	96.0 *	2.3	1.7	0.0
North Dakota	162	98.8 *	0.0	1.2	0.0
Ohio	1,194	35.8	43.3	20.9	0.0
Oklahoma	163	100.0	0.0	0.0	0.0
Oregon	7,637	87.6	12.1	0.3	0.0
Pennsylvania	515	90.1	0.0	9.9	0.0
Rhode Island	61	100.0	0.0	0.0	0.0
South Carolina	1,143	0.0 *	12.4	87.6	0.0
South Dakota	179	69.3 *	28.5	2.2	0.0
Tennessee	2,037	83.0 *	13.8	3.2	0.0
Texas	8,676	94.5 *	5.3	0.2	0.0
Utah	273 *	37.4 *	20.9	41.8	0.0
Vermont	444	95.0 *	2.9	2.0	0.0
Virginia	4,358	98.8	0.8	0.4	0.0
Washington	897	13.2	85.7	1.1	0.0
West Virginia	477 *	64.4 *	0.0	35.6	0.0
Wisconsin	721	41.9	38.8	18.2	1.1
Wyoming	262	94.7	0.0	5.3	0.0

SOURCE: Counts provided by the states and supplemental estimates prepared by Mathematica Policy Research, Inc., from FSPQC data.

NOTE: Arkansas, DC, and Illinois have no ABAWDs subject to the time limit. Other ABAWDs may be meeting the work requirement, and this is particularly true in Illinois, but they are not counted here.

\* Denotes sample estimate.

<sup>a</sup> Self-initiated community service accounts for nearly all of this figure.

TABLE II.11

## STATE ESTIMATES OF PERCENTAGE OF ABAWD PARTICIPANTS SUBJECT TO THE TIME LIMIT WHO WERE MEETING THE WORK REQUIREMENT, BY METHOD, MARCH 2000

State	Number Subject to Time Limit	Method of Meeting the Work Requirement				Not Meeting Req.
		Working	Workfare	Education and Training	Other Qualifying Activity	
U.S. Total	215,800	23.4	23.4	3.6	0.6	49.0
Alabama	2,302	19.7 *	24.0	0.0	0.0	56.3 *
Alaska	573 *	31.2 *	10.3	0.0	0.0	58.5
Arizona	7,029 *	49.4	2.9	0.0	0.0	47.7
Arkansas	0					
California	55,358	22.0 *	40.2	3.4	0.0	34.4 *
Colorado	1,707	3.0	29.1	10.6	0.0	57.2
Connecticut	370 *	21.1 *	4.1	8.1	0.0	66.8 *
Delaware	672 *	19.6 *	0.3	0.0	0.0	80.1 *
District of Columbia	0					
Florida	1,688 *	24.8 *	6.6	2.0	0.0	66.6 *
Georgia	2,664 *	28.8 *	6.5	0.9	0.0	63.9 *
Hawaii	1,353	18.0 *	0.0	0.4	0.0	81.7
Idaho	216	9.3 *	29.2	0.5	0.0	61.1
Illinois	0					
Indiana	1,806	8.4	0.0	9.4	3.8	78.4
Iowa	1,388	29.3 *	0.0	0.0	0.0	70.7 *
Kansas	2,174	20.4	0.0	0.0	0.0	79.6
Kentucky	2,694	27.2	0.0	20.9	0.0	51.9
Louisiana	1,337	25.4 *	3.3	0.4	0.0	70.9 *
Maine	222	18.5	2.7	0.5	0.0	78.4
Maryland	1,180	0.5	0.0	0.0	0.0	99.5
Massachusetts	2,159 *	11.4 *	4.9	0.0	0.0	83.6 *
Michigan	16,644	9.1	0.0	4.4	7.3	79.2
Minnesota	4,282	16.0 *	0.6	5.6	0.0	77.9 *
Mississippi	1,160	12.8	85.9	0.0	1.2	0.0
Missouri	4,376 *	7.6 *	0.0	0.9	0.0	91.5 *
Montana	581 *	0.0 *	0.0	67.8	0.0	32.2 *
Nebraska	674 *	22.8 *	4.0	0.0	0.0	73.1 *
Nevada	774	4.5 *	0.4	3.1	0.3	91.7
New Hampshire	52 *	0.0 *	76.9	11.5	0.0	11.5 *
New Jersey	1,339	29.8 *	11.7	53.5	0.0	5.0 *
New Mexico	1,073 *	0.9 *	0.0	0.7	0.0	98.4 *
New York	25,413	6.1 *	84.6	3.1	0.0	6.2 *
North Carolina	5,348 *	29.8 *	0.7	0.5	0.0	69.0 *
North Dakota	404	39.6 *	0.0	0.5	0.0	59.9
Ohio	10,844 *	3.9	4.8	2.3	0.0	89.0
Oklahoma	4,081	4.0	0.0	0.0	0.0	96.0
Oregon	8,072	82.9	11.4	0.3	0.0	5.4
Pennsylvania	3,777 *	12.3	0.0	1.4	0.0	86.4
Rhode Island	286	21.3	0.0	0.0	0.0	78.7
South Carolina	2,077	0.0 *	6.8	48.2	0.0	45.0
South Dakota	400	31.0 *	12.8	1.0	0.0	55.2
Tennessee	3,447	49.0 *	8.2	1.9	0.0	40.9
Texas	16,435	49.9 *	2.8	0.1	0.0	47.2
Utah	952 *	10.7 *	6.0	12.0	0.0	71.3 *
Vermont	1,381	30.6 *	0.9	0.7	0.0	67.8
Virginia	7,801	55.2	0.4	0.2	0.0	44.1
Washington	3,604	3.3	21.3	0.3	0.0	75.1
West Virginia	967	31.7 *	0.0	17.6	0.0	50.7 *
Wisconsin	2,225	13.6	12.6	5.9	0.4	67.6
Wyoming	472	52.5	0.0	3.0	0.0	44.5

SOURCE: Counts provided by the states and supplemental estimates prepared by Mathematica Policy Research, Inc., from FSPQC data.

\* Denotes sample estimate.

were subject to the time limit in each state, showing the percentage meeting the work requirement by the way in which they were doing so and, in the last column, the percentage who were *not* meeting the work requirement.

These tables illustrate how the distribution of ABAWD participants among the different methods varied widely by state. As Table II.10 suggests, California and New York accounted for most (87 percent) of the workfare participants nationally in March 2000. These two states skewed the national workfare totals, suggesting that workfare was more widely used than it was.<sup>9</sup> From Table II.11 we see that while 23 percent of all ABAWDs who were subject to the time limit were meeting the work requirement through workfare, there were only 18 states in which at least 5 percent of the ABAWD participants were doing so. By contrast, there were 38 states in which at least 5 percent of the ABAWD participants who were subject to the time limit were meeting the work requirement by working, and 23 states in which at least 20 percent were doing so. If we exclude California and New York, we calculate from the data underlying Table II.10 that 74 percent of those ABAWDs who were meeting the work requirement were doing so through work, 13 percent were participating in workfare, 10 percent were participating in education and training, and 3 percent were engaged in another qualifying work activity.

Additionally, we observe that while working and workfare dominated education and training in the aggregate, there were a few states in which education and training accounted for a larger share of ABAWD participants than at least one if not both of these alternative activities. Still, there were only 12 states in which at least 5 percent of the ABAWDs subject to the time limit were meeting the work requirement through education and training.

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<sup>9</sup> Moreover, data supplied by the state of California indicates that Los Angeles accounted for 84 percent of the state's workfare slots for ABAWDs. Thus, the use of workfare was even more limited, geographically, than Table II.10 suggests. Fully 80 percent of the reported workfare participants in March 2000 lived in Los Angeles or New York State.

## **E. CHARACTERISTICS OF PARTICIPANTS SUBJECT TO THE TIME LIMIT**

Prior to this study, the best information on the characteristics of ABAWDs came from studies using FSPQC data and relying on simulation methods to identify participants who were likely to have been designated as ABAWDs. Using data from FY96, the year before the ABAWD provisions were implemented, Stavrianos and Nixon (1998) established several important findings about the characteristics of ABAWD participants who were neither working 20 hours per week nor participating in workfare. First, the majority (58 percent) of these ABAWDs were male. This contrasted with all adult FSP participants, 70 percent of whom were female. Second, ABAWDs were somewhat older than all participants within the 18 to 50 age group. Third, ABAWDs tended to have shorter spells of participation, were much more likely to live in one-person units, and were much less likely to have any income than all adult participants. Fourth, ABAWDs were undifferentiated from all other participants with respect to educational attainment.

Have the characteristics of ABAWD participants changed since the implementation of the ABAWD provisions and e dramatic decline in the size of this population? Using FSPQC data and tabulations provided by a subset of states, we examine two questions: (1) How do ABAWD participants who are subject to the time limit compare with all participants 18 to 50? (2) How do ABAWDs who are meeting the work requirement compare with those who are not?<sup>10</sup>

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<sup>10</sup> Estimates for all participants age 18 to 50 are based entirely on FSPQC data. Estimates for participants subject to the ABAWD time limit utilize the tabulations provided by about one-third of the states combined with FSPQC data for the remaining states. The small numbers of ABAWD participants in the state QC samples generally and questions about the identification of ABAWDs in at least some state QC samples argue for relying on the state tabulations to the fullest extent possible. Supplementing the state tabulations with FSPQC data allows us to make national estimates. See Appendix B for a discussion of methodology.

## 1. ABAWD Participants Versus All Participants 18 to 50

Participants who were subject to the ABAWD time limit were divided almost equally between men and women, with men accounting for 53 percent of this group (Table II.12). Among all participants age 18 to 50 only 28 percent were male. We attribute this difference almost entirely to the fact that participants who were responsible for a dependent child were excluded from the ABAWD population. While men and women in two-parent families are likely to have been excluded with equal frequency, single-parent families are predominantly female. Participants subject to the ABAWD time limit differed from all participants in their age distribution as well. Among ABAWD participants, men and women had very similar age distributions, with a decided shift toward the upper ages. The single largest age group among both men and women was 41 to 45.<sup>11</sup> Even though the 18 to 20 age group encompasses just three years, the number of ABAWDs in this group was also relatively large. This pattern may vary seasonally, however. The FSPQC data, which reflect the full fiscal year, show this surplus of young ABAWDs, but the state tabulations, based on March 2000, do not.<sup>12</sup> Among all participants age 18 to 50 there was a fairly uniform distribution by age, but males were distributed somewhat differently than females. Men were most numerous in the 36 to 45 age range while women were more heavily concentrated between 21 and 30.

The racial and ethnic composition of participants subject to the ABAWD provisions was strikingly similar to that of all participants 18 to 50. In both populations white, non-Hispanic

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<sup>11</sup> Note that the top age group, 46 to 50, includes only four rather than five years in most states. This is because we defined the upper end of this age group to be consistent with each state's interpretation of "18 to 50" in the ABAWD provisions. In FY00 nearly every state excluded participants from the ABAWD population once they became 50.

<sup>12</sup> This pattern in the FSPQC data was evident both among states that submitted ABAWD tabulations and among those that did not, so the difference between the FSPQC data and state tabulations cannot be explained by differences between the states that submitted tabulations and those that did not.

TABLE II.12

DEMOGRAPHIC CHARACTERISTICS OF PARTICIPANTS SUBJECT TO THE ABAWD TIME LIMIT AND ALL PARTICIPANTS 18 TO 50, FY00

Characteristic	Participants Subject to the ABAWD Time Limit			All Participants 18 to 50		
	Male	Female	Total	Male	Female	Total
	Percentage Distribution			Percentage Distribution		
Age	52.7	47.3	100.0	28.2	71.8	100.0
18-20	9.4	8.1	17.6	3.0	6.7	9.7
21-25	5.4	6.4	11.7	3.1	13.8	16.8
26-30	5.5	4.1	9.6	3.7	13.1	16.8
31-35	6.7	4.6	11.3	4.4	12.2	16.6
36-40	7.0	8.1	15.1	5.3	11.5	16.8
41-45	11.5	10.2	21.7	5.3	9.0	14.3
46-50	7.1	5.8	12.9	3.4	5.5	8.9
Race	52.7	47.3	100.0	28.2	71.8	100.0
White, Non-Hispanic	23.1	20.9	43.9	15.1	30.3	45.4
Black, Non-Hispanic	19.3	18.0	37.3	7.3	28.1	35.4
Hispanic	7.7	6.4	14.1	4.3	10.8	15.1
Asian, Pacific Islander	1.7	0.9	2.6	0.9	1.5	2.4
Native American	0.9	1.1	2.0	0.6	1.2	1.8

SOURCE: Prepared by Mathematica Policy Research, Inc., from FSPQC data and tabulations provided by the states.

NOTE: The age group 46-50 includes only four rather than five years in most states because we defined the upper limit to be consistent with each state's interpretation of "18 to 50" in the ABAWD provisions. In FY00 nearly every state excluded participants from the ABAWD population once they became 50.

participants were the largest group among both men and women with blacks being a close second.

Participants subject to the ABAWD time limit tended to have shorter spells of food stamp participation to date than all participants age 18 to 50 did (Table II.13). The median duration among participants subject to the work requirement was 4.4 months versus 11.6 months among all participants. About three times as many ABAWD participants as all participants were in their

TABLE II.13

NUMBER OF CONSECUTIVE MONTHS RECEIVING FOOD STAMPS BY PARTICIPANTS  
SUBJECT TO THE ABAWD TIME LIMIT AND ALL PARTICIPANTS 18 TO 50, FY00

Number of Consecutive Months Receiving Food Stamps	Participants Subject to the ABAWD Time Limit		All Participants 18 to 50	
	Percent of Total	Cumulative Percent	Percent of Total	Cumulative Percent
Total	100.0		100.0	
1	17.8	17.8	6.1	6.1
2	12.3	30.1	7.6	13.7
3	11.9	42.0	7.2	20.9
4 to 6	16.8	58.8	13.8	34.7
7 to 9	7.8	66.6	8.8	43.5
10 to 12	4.5	71.1	7.5	51.0
13 or more	28.9	100.0	48.9	100.0
Median Number of Months		4.4		11.6

SOURCE: Prepared by Mathematica Policy Research, Inc., from FSPQC data and tabulations provided by the states.

first month of benefit receipt. At the other end of the distribution, only 29 percent of ABAWD participants had been receiving food stamps for more than 12 months compared with nearly half of all participants 18 to 50. While this undoubtedly reflects, in part, the impact of time limits, Stavrianos and Nixon (1998) reported that even before the ABAWD provisions were implemented, participants who could be identified as ABAWDs were in shorter spells than were all adult participants.

Well over half of ABAWD participants were in one-person households, and roughly three-quarters were in households with fewer than three members (Table II.14). Like the sex distribution, this largely reflects the exclusion of participants with dependent children. By



TABLE II.14

HOUSEHOLD SIZE AND AVERAGE MONTHLY BENEFIT OF PARTICIPANTS  
SUBJECT TO THE ABAWD TIME LIMIT AND ALL PARTICIPANTS 18 TO 50, FY00

Household Size	Participants Subject to The ABAWD Time Limit		All Participants 18 to 50	
	Percent of Participants	Average Monthly Benefit	Percent of Participants	Average Monthly Benefit
Total	100.0	158	100.0	212
One	57.8	110	20.8	81
Two	17.5	162	19.6	157
Three	10.9	230	21.8	220
Four	7.0	249	18.5	269
Five	3.3	302	10.5	303
Six or more	3.5	394	8.7	401
Median Size	1.0		2.4	

SOURCE: Prepared by Mathematica Policy Research, Inc., from FSPQC data and tabulations provided by the states.

contrast, only about one-fifth of all participants 18 to 50 were in one-person households, and barely two-fifths were in households with fewer than three members.

At least in part because of the differential distribution by household size, participants who were subject to the ABAWD time limit were in households with smaller average monthly benefits (\$158) than all participants 18 to 50 (\$212). However, ABAWD participants in one-person households received *larger* monthly benefits than their counterparts among all participants. In other size categories, the monthly benefits were more nearly identical between ABAWD participants and all participants 18 to 50, suggesting that their household incomes were more nearly equal.

Personal income data, while not broken down by household size, nevertheless suggest why ABAWD participants in one-person households tended to receive larger benefits than other participants in one-person households. In general, ABAWD participants had lower personal

income than all participants 18 to 50. About half of ABAWD participants had no income compared with less than one-quarter of all participants 18 to 50 (Table II.15). There was no difference between the two groups with respect to the incidence of earnings, but ABAWD participants were markedly less likely to have unearned income. Even among those who *did* have income, ABAWD participants had lower median total income, lower median earnings, and lower median unearned income than did all participants age 18 to 50.

## **2. Meeting the Work Requirement**

Among participants who were subject to the ABAWD time limit, those who were meeting the work requirement were undifferentiated by sex from those who were not meeting the requirement, and they tended to be only slightly older (Table II.16). Racial differences were more pronounced. Hispanic participants accounted for a much greater share of those who were meeting the work requirement (21.8 percent) than of those who were not (6.2 percent), with white participants making up a correspondingly smaller share of those meeting (37.7 percent) versus not meeting the work requirement (50.4 percent). Location could account for at least some of the racial difference. Los Angeles and New York accounted for 80 percent of the workfare slots in the United States and had relatively large Hispanic populations.

Statistics on the incidence of homelessness among the food stamp population in general and the ABAWD population in particular are not available in the FSPQC data or in national surveys that identify food stamp participants, but six states were able to provide such statistics on their ABAWD participants. Among these six states, 6.5 percent of the participants who were subject to the ABAWD time limit were reported to lack a stable or permanent residence (Table II.17). By this measure, the incidence of homelessness was slightly lower (5.6 percent) among those participants who were meeting the work requirement than among those who were not (6.8 percent).

TABLE II.15

INCOME OF FOOD STAMP PARTICIPANTS SUBJECT TO THE ABAWD TIME LIMIT  
AND ALL PARTICIPANTS 18 TO 50, FY00

Income Measure	Participants Subject to the ABAWD Time Limit			All Participants 18 to 50		
	Total Income	Earned Income	Unearned Income	Total Income	Earned Income	Unearned Income
Percent with No Income	49.2%	68.5%	76.7%	24.4%	68.4%	45.6%
Median Amount	\$18	\$0	\$0	\$484	\$0	\$119
Median Nonzero Amount	\$455	\$584	\$260	\$569	\$743	\$486

SOURCE: Prepared by Mathematica Policy Research, Inc., from FSPQC data and tabulations provided by the states.

Both the degree to which ABAWD participants were homeless and the differential between those meeting and not meeting the work requirement varied substantially among the six states. In Kentucky and Ohio, fewer than 4 percent of ABAWD participants were homeless compared with 12.9 percent in Maine. In Maine and Rhode Island, homelessness was much less prevalent among participants meeting versus not meeting the work requirement. In the other states, however, the differences were small. In Colorado, homelessness was actually *more* prevalent among ABAWDs meeting the work requirement.

TABLE II.16

DEMOGRAPHIC CHARACTERISTICS OF PARTICIPANTS SUBJECT TO THE TIME LIMIT  
BY WHETHER OR NOT THEY WERE MEETING THE WORK REQUIREMENT, MARCH 2000

Characteristic	Meeting the Work Requirement			Not Meeting the Work Requirement		
	Male	Female	Total	Male	Female	Total
	Percentage Distribution			Percentage Distribution		
Age	51.9	48.1	100.0	53.5	46.5	100.0
18-20	7.4	5.8	13.2	11.5	10.6	22.1
21-25	5.6	7.6	13.1	5.1	5.1	10.2
26-30	3.7	5.6	9.3	7.3	2.6	9.9
31-35	7.5	3.9	11.4	5.9	5.4	11.3
36-40	6.0	9.1	15.0	8.2	7.1	15.3
41-45	14.6	10.6	25.2	8.3	9.7	18.1
46-50	7.1	5.6	12.7	7.1	6.1	13.2
Race	51.9	48.1	100.0	53.5	46.5	100.0
White, Non-Hispanic	19.3	18.4	37.7	27.0	23.4	50.4
Black, Non-Hispanic	18.0	18.1	36.1	20.7	18.0	38.6
Hispanic	11.2	10.6	21.8	4.0	2.1	6.2
Asian, Pacific Islander	2.0	0.2	2.2	1.3	1.7	3.0
Native American	1.4	0.9	2.2	0.4	1.4	1.8

SOURCE: Prepared by Mathematica Policy Research, Inc., from FSPQC data and tabulations provided by the states.

NOTE: The age group 46-50 includes only four rather than five years in most states because we defined the upper limit to be consistent with each state's interpretation of "18 to 50" in the ABAWD provisions. In FY00 nearly every state excluded participants from the ABAWD population once they became 50.

Meeting the work requirement allows participants to avoid using up their time-limited benefits, so we would expect to see evidence of longer benefit durations among participants who meet the work requirement than among those who do not. This expectation is borne out (Table II.18). Participants who were meeting the work requirement had been receiving food stamps for nearly eight months, on average, while those who were not meeting the work requirement had received food stamps for just over two months. Almost 40 percent of participants who were

TABLE II.17

LACK OF A STABLE OR PERMANENT RESIDENCE AMONG PARTICIPANTS SUBJECT TO THE ABAWD TIME LIMIT BY WHETHER OR NOT THEY WERE MEETING THE WORK REQUIREMENT, MARCH 2000

State	Participants Subject to the ABAWD Time Limit	Meeting the Work Requirement	Not Meeting the Work Requirement
Percent Who Lack a Stable or Permanent Residence			
Colorado	6.3	7.7	5.3
Kentucky	3.9	3.2	4.5
Maine	12.9	2.1	15.3
Michigan	8.7	7.2	9.1
Ohio	3.7	2.7	3.8
Rhode Island	7.3	1.0	10.9
State Average			
Weighted	6.5	5.6	6.8
Not Weighted	7.1	4.0	8.2

Source: Tabulations provided by the indicated states.

Note: In Ohio, the proportion of all food stamp participants 18 to 50 who lacked a stable or permanent residence was 2.2 percent. This information was not obtained from the other states.

meeting the work requirement had been receiving food stamps for more than 12 months compared with only 18 percent of participants who were not meeting the work requirement.

Under the law, in general, an ABAWD participant who failed to meet the work requirements could receive food stamps for no more than three or four months (in the latter case with a partial first month). Yet more than one-fourth of those who were not meeting the work requirement had received food stamps for more than six months. How do we explain this? Given the timing of our data collection, some participants may have lived in states that had reset their 36-month clocks a few months earlier, allowing participants to receive food stamps for two consecutive three-month periods. But even this would allow at most six or seven months of benefits, and most of the participants who exceeded six months had accumulated nine months or more. The

TABLE II.18

NUMBER OF CONSECUTIVE MONTHS RECEIVING FOOD STAMPS:  
PARTICIPANTS SUBJECT TO THE ABAWD TIME LIMIT BY WHETHER  
OR NOT THEY WERE MEETING THE WORK REQUIREMENT, MARCH 2000

Number of Consecutive Months Receiving Food Stamps	Meeting the Work Requirement		Not Meeting the Work Requirement	
	Percent of Total	Cumulative Percent	Percent of Total	Cumulative Percent
Total	100.0		100.0	
1	7.2	7.2	28.7	28.7
2	6.9	14.2	17.8	46.5
3	9.8	23.9	14.2	60.7
4 to 6	20.6	44.5	12.9	73.6
7 to 9	9.9	54.4	5.7	79.2
10 to 12	6.0	60.4	3.0	82.2
13 or more	39.6	100.0	17.8	100.0
Median Number of Months		7.7		2.2

Source: Prepared by Mathematica Policy Research, Inc., from FSPQC data and tabulations provided by the states.

more likely explanation is that part of the time period did not count against the three-month limit. Participants may have met the work requirement in earlier months, been defined as a non-ABAWD, or been waived. Without longitudinal data on these participants, we have no way in most cases to establish what may account for their extended participation.

Participants who were meeting the work requirement tended to be in larger households and receive smaller monthly benefits than participants who were not meeting the work requirement (Table II.19). A possible explanation for the difference in household size is that ABAWD participants in larger households were more likely to work because they were more likely to be responsible for others. Whatever the explanation for the household size differential, the lower benefits in every size class among participants who were meeting the work requirement is an

TABLE II.19

HOUSEHOLD SIZE AND AVERAGE MONTHLY BENEFIT:  
PARTICIPANTS SUBJECT TO THE ABAWD TIME LIMIT BY WHETHER  
OR NOT THEY WERE MEETING THE WORK REQUIREMENT, MARCH 2000

Household Size	Meeting the Work Requirement		Not Meeting the Work Requirement	
	Percent of Participants	Average Monthly Benefit	Percent of Participants	Average Monthly Benefit
Total	100.0	127	100.0	190
One	49.9	79	66.0	133
Two	18.1	118	16.9	210
Three	14.2	172	7.5	345
Four	9.7	198	4.1	374
Five	4.8	231	1.8	503
Six or more	3.3	350	3.7	434
Median Size	1.0		0.1	

Source: Prepared by Mathematica Policy Research, Inc., from FSPQC data and tabulations provided by the states.

indication of their higher income, which we attribute to the fact that many of these participants were working.

The employment differential is confirmed in Table II.20, which reports summary statistics for total income, earned income, and unearned income for the two groups of participants. It is no surprise that half of those who were meeting the work requirement had earned income; we showed earlier that nearly half of those who met the work requirement did so by working. It is noteworthy, however, that about 15 percent of participants who were *not* meeting the work requirement had earned income as well. They were apparently not working enough hours to satisfy the work requirement. Consistent with this interpretation, their median monthly income of \$304 was well below the \$412 that they would have earned with 80 hours per month at the minimum wage (\$5.15 at the time). Participants who met the work requirement had median earnings more than twice as high, at \$661.

TABLE II.20

## INCOME OF FOOD STAMP PARTICIPANTS SUBJECT TO THE ABAWD TIME LIMIT BY WHETHER OR NOT THEY WERE MEETING THE WORK REQUIREMENT, MARCH 2000

Income Measure	Meeting the Work Requirement			Not Meeting the Work Requirement		
	Total Income	Earned Income	Unearned Income	Total Income	Earned Income	Unearned Income
Percent with No Income	30.5%	53.0%	70.9%	68.7%	84.6%	82.7%
Median Amount	\$329	\$0	\$0	\$0	\$0	\$0
Median Nonzero Amount	\$526	\$649	\$277	\$271	\$304	\$238

SOURCE: Prepared by Mathematica Policy Research, Inc., from FSPQC data and tabulations provided by the states.

Participants who were meeting the work requirement were also somewhat more likely to have unearned income (about 29 percent versus 17 percent). This may reflect the impact of general assistance programs in a few large states with high workfare participation and, therefore, many ABAWD participants meeting the work requirement.

## F. NUMBER REACHING THE TIME LIMIT

An important reason why the ABAWD share of the participant population is not higher is the cumulative impact of the ABAWD policy itself. The first terminations or departures of participants who failed to meet the work requirement for three months occurred in February or March 1997, depending on when each state implemented the ABAWD policy.<sup>13</sup>

Few states, however, can determine the number of ABAWD participants who reach the time limit in a given month and lose their benefits. Even fewer states have compiled such statistics

<sup>13</sup> See Chapter V for a discussion of what determined the implementation date of the ABAWD policy in each state.



continuously since they implemented the ABAWD policy. We obtained complete statistics, covering February 1997 through March 2000, from six states and partial statistics from six additional states. Monthly counts of terminations due to the three-month time limit are plotted in Figure II.5 for each of the six states with complete data and for a total pooled across all six states.

After a peak of nearly 7,000 in March 1997, the number of terminations of ABAWD participants reaching the three-month time limit in these six states dropped below 2,000 the next month. A few months later, the number of terminations more or less leveled off at a monthly average of just above 1,000. Each of the six states exhibited a very similar pattern although they differed in whether the first, and therefore peak, terminations occurred in February or March of 1997.

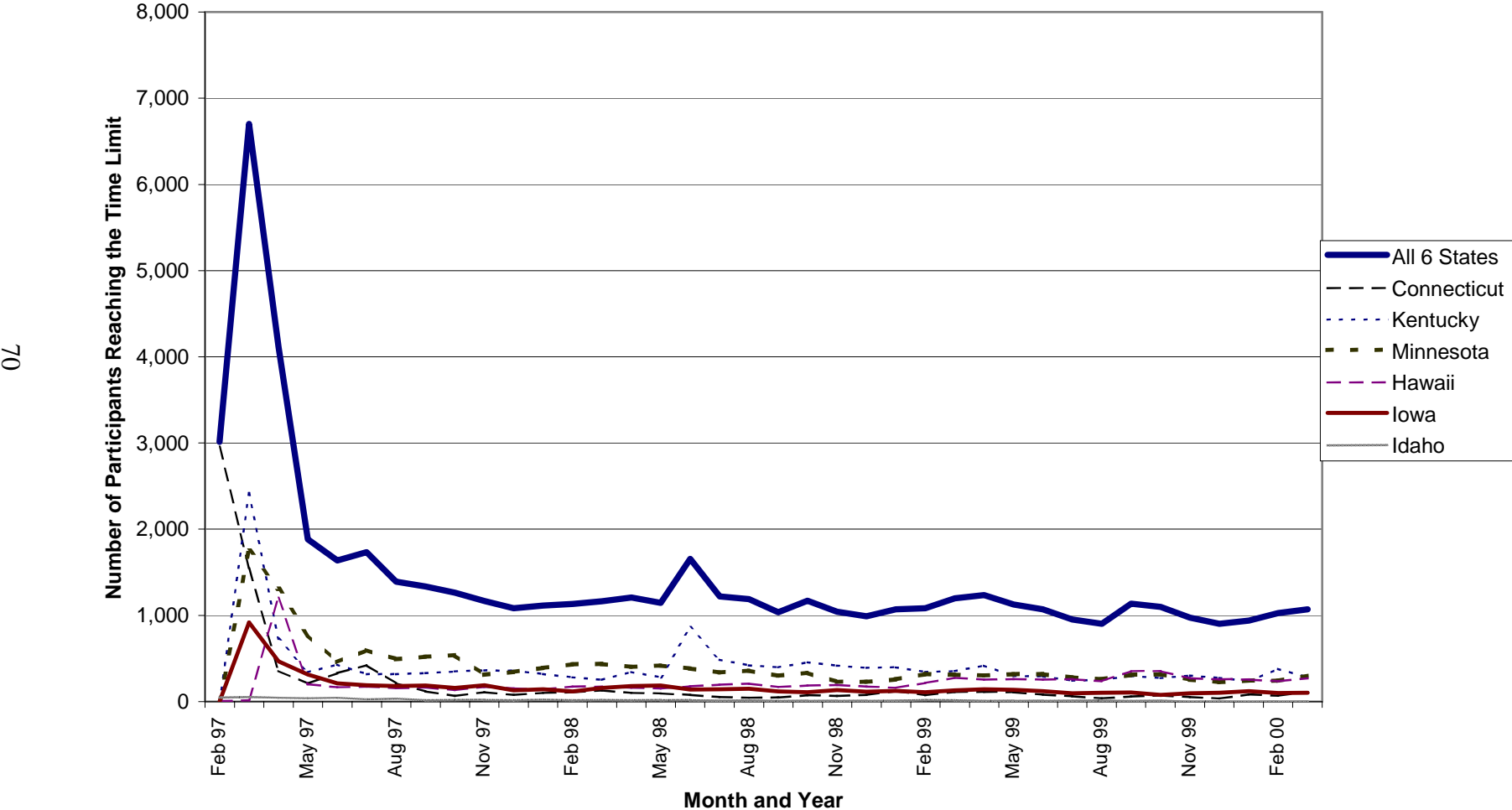
Three features of this time pattern are notable. First, the early peak of terminations reflects the large number of ABAWD participants who were in the program at the time that the provisions went into effect. Those who failed to satisfy the work requirement lost their benefits three months after implementation. From that point on, terminations reflected a changing mix of:

- Members of the initial pool of ABAWD participants who met the work requirement during the initial three months but not subsequently
- Members of the initial pool of non-ABAWD participants who later became subject to the time limit
- Returning participants who had left without using up their three months of benefits
- New participants who joined the program rolls after the ABAWD provisions had gone into effect

Over time, new participants made up a larger proportion of the total ABAWD pool, reflecting the dynamics of the food stamp caseload. Second, the entry of new ABAWD participants into the FSP has been large enough, apparently, to maintain the monthly terminations at a relatively

FIGURE II.5

NUMBER OF ABAWD PARTICIPANTS REACHING THE THREE MONTH TIME LIMIT  
IN SIX STATES, FEBRUARY 1997 THROUGH MARCH 2000



SOURCE: Tabulations provided by states.

constant level after the provisions had been in effect for several months. This underscores the likelihood that there may be substantial turnover in participation in this group. Third, there is no echo of the initial peak terminations three years later—none whatsoever. The initial ABAWD participants who were enrolled when the provisions went into effect and lost their benefits in February or March of 1997 apparently did not return in large numbers when the start of a new 36-month clock entitled them to do so. We cannot tell how many did in fact return and meet the work requirement for at least a short while, and the time series may end too early to show a secondary peak created by returning cases. But it is significant that we saw no evidence of an echo in the longer time series of ABAWD participants, presented earlier (see Figure II.3). It appears from these two time series that either very few of the participants who exhausted their three months of benefits during the initial 36-month period returned to the program or, if they did return, they came back as non-ABAWDs.

One other small point deserves mention. The Kentucky series shows a sudden, substantial upturn in terminations in June 1998, which is followed by an almost as steep decline, except that the series remains above its May 1998 level for many months thereafter. We consulted with state staff in Kentucky and learned that in March of that year a number of counties lost their waivers from the ABAWD provisions, making a large number of participants suddenly subject to the time limit. The June upturn followed the loss of waivers by three months and was attributable to the subset of participants who were unable to meet the work requirement for even a single month. That the number of terminations remained at a level above the May 1998 figure was due to the increased pool of participants who became subject to the time limit and, over time, added to the numbers who were unable to maintain their eligibility indefinitely. We observed a similar phenomenon in the Rhode Island series, which is not shown because it did not span the full time period. State staff in Rhode Island provided the same explanation as the Kentucky staff. That the time series from both states should reflect so clearly the impact of a

loss of waivers enhances their credibility and underscores the sensitivity of terminations to changes in the number of FSP participants subject to the ABAWD time limit.

We can extrapolate from the 12 states with partial or complete termination data to estimate the total number of terminations nationally over the full period. To do so requires an appropriate scale factor for each month that will let us inflate the known number of terminations to the unknown total. For March 2000, we have observations on a small number of characteristics for all of the states. By selecting one or more characteristics that are correlated with the number of terminations, we can calculate the 12-state share of the national total for each characteristic and then divide the terminations in the 12 states by this share to inflate the number of terminations an equivalent amount. For example, if the 12 states account for 10 percent of the national total for a relevant characteristic, then we would inflate the number of terminations in the 12 states by a factor of 10.

Two characteristics that appeared to be good candidates for this exercise are the number of ABAWD participants subject to the time limit and the number of these who failed to meet the work requirement. To incorporate into our estimates the incomplete observations for six states, we calculated shares of the national total of each characteristic for just those states with termination data in a given month and then inflated the terminations for those states. For the first month of the series we had only the six states with complete data, but we added a seventh state, Indiana, in the second month and five more states in subsequent months, ending with California as the 12th state in the final three months. While the change in the mix of states from one month to the next could introduce a disjuncture into the time series, only California was large enough to pose a serious problem.

While we would have preferred to have measures of the number of participants subject to the time limit and the number failing to meet the work requirement in all states at multiple points along the 38-month continuum, we could assemble such measures for only March 2000. We run

the risk, then, that even if one of the selected characteristics were perfectly related to the number of terminations in March 2000, this relationship might not hold in earlier months. Nevertheless, even with this limitation, and the attendant error in our extrapolation, being able to produce estimates of terminations at the national level for the full 38-month period was clearly preferable to having no estimates at all.

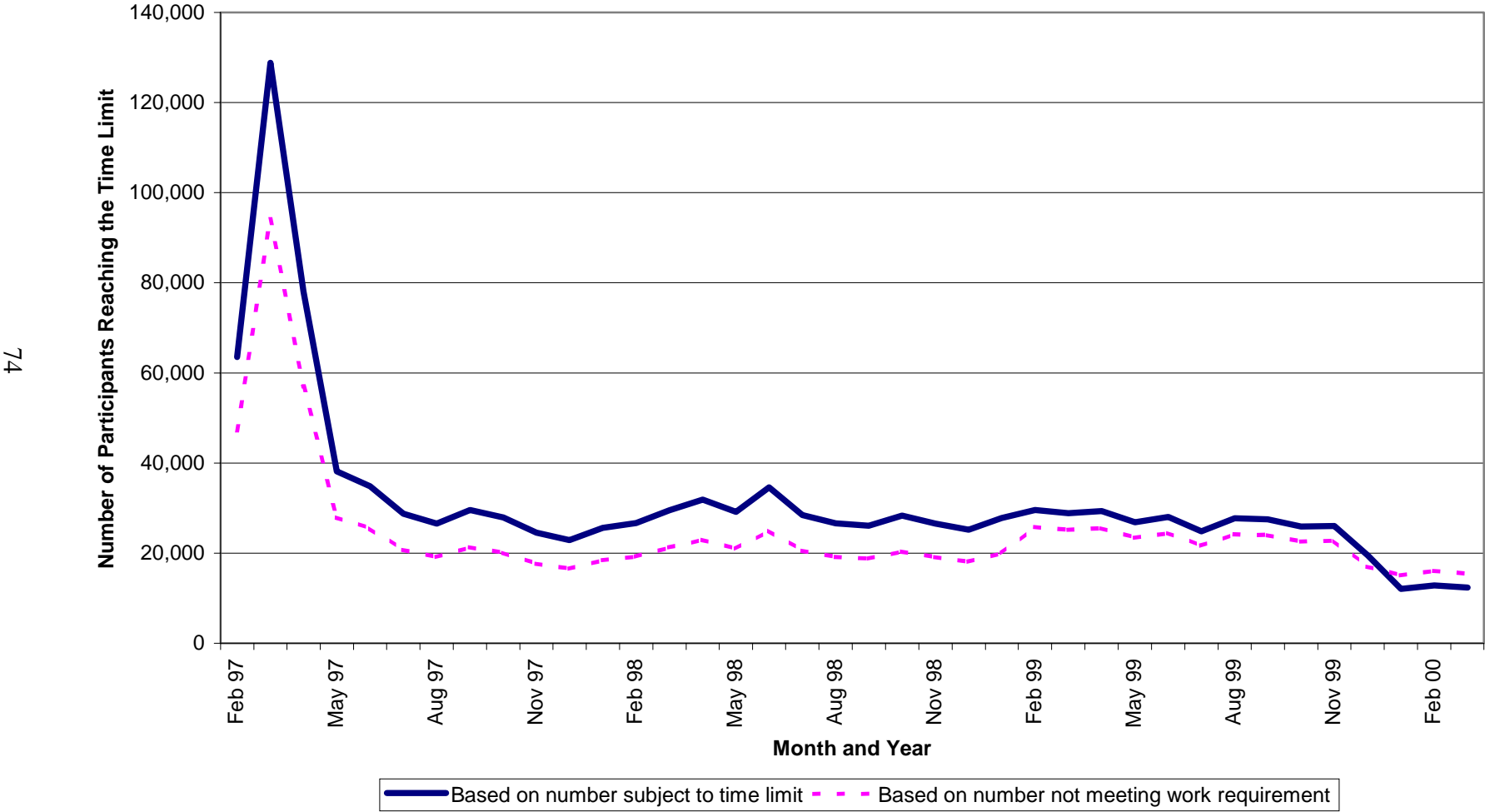
Figure II.6 presents a plot of the time series of terminations obtained by application of this methodology using the two characteristics identified earlier. The series represented by the solid line was derived by calculating state shares of the number of ABAWD participants subject to the time limit. The series represented by the broken line was derived using state shares of the number of ABAWDs who failed to meet the work requirement. Intuitively, the latter is the more appropriate statistic for extrapolating the number of terminations. In fact, the data obtained using this variable shows less of a shift when California is introduced than does the series derived using shares of the number of ABAWD participants subject to the time limit.

Table II.21 presents estimates of the cumulative number of terminations over selected time periods. The first two columns are based on the data from Figure II.6. The final two columns present estimates extrapolated from just the six states that provided complete data. Comparing the alternative estimates allows us to assess their sensitivity to some of the assumptions underlying the methods used to derive them.

We regard the estimates in the first column as the most accurate because they make use of the available data from all 12 states and they base the extrapolation on what is, in theory, the more relevant of the two indicators. These estimates indicate that nearly 200,000 ABAWD participants used up their time-limited benefits during February, March, and April 1997—the first three months in which it was possible to do so. During the next three months the number of terminations dropped to 74,000 or little more than a third of the February through April number. Through November 1997, ending the first full year in which the ABAWD provisions were in

FIGURE II.6

NATIONAL ESTIMATE OF ABAWD PARTICIPANTS REACHING THE 3-MONTH TIME LIMIT,  
BASED ON EXTRAPOLATION FROM 12 STATES



SOURCE: Extrapolation from data supplied by 12 states.

TABLE II.21

ESTIMATED NUMBER OF TERMINATIONS OF ABAWD PARTICIPANTS  
REACHING THE THREE-MONTH TIME LIMIT, SELECTED PERIODS

Time Period	Method of Extrapolating from States Reporting Terminations			
	12 States with Complete or Partial Data		6 States with Complete Data	
	Based on Share of ABAWDs Not Meeting the Work Requirement	Based on Share of ABAWDs Subject to Time Limit	Based on Share of ABAWDs Not Meeting the Work Requirement	Based on Share of ABAWDs Subject to Time Limit
February through April 1997	198,400	270,300	216,900	291,500
May through July 1997	74,100	101,800	82,400	110,700
August through November 1997	78,200	108,500	80,900	108,700
Cumulative through November 1997	350,700	480,600	380,100	510,900
December 1997 through November 1998	242,300	336,300	222,200	298,500
December 1998 through November 1999	277,700	327,700	201,300	270,600
Cumulative through November 1999 (First 36-month period)	870,700	1,144,700	803,600	1,080,000
Cumulative through March 2000	934,300	1,201,500	865,400	1,163,000

SOURCE: Mathematica Policy Research, Inc., based on tabulations supplied by 12 states and extrapolated to all states using additional tabulations provided by the states, supplemented with FSPQC sample data.

NOTE: The six states that provided complete data for February 1997 through March 2000 are Connecticut, Hawaii, Idaho, Iowa, Kentucky, and Minnesota. The six states that provided partial data, with the starting date of each series are: Indiana (March 1997), Washington (July 1997), Rhode Island (August 1997), Maine (October 1998), Texas, (February 1999), and California (January 2000).

effect, the cumulative number of terminations was 352,000. During the next year, ending November 1998, the number of terminations was 242,000. Terminations rose slightly to nearly 278,000 during the year ending November 1999. For the first 36-month period, then, the cumulative number of terminations was about 871,000. This figure represents an estimate of the number of ABAWD participants who lost at least one month of benefits due to the time limit.<sup>14</sup> We cannot estimate the total number of months of benefits that were lost because we do not know the number of additional months for which the clients who were terminated would have continued to receive benefits in the absence of the time limit.

With many states resetting their 36-month clocks in November or December 1999 (see Chapter V), the number of terminations might have been expected to have dropped around that time and not picked up until February or March 2000. Figure II.6 provides some indication of this pattern, with a decline in terminations beginning after November 1999. Starting in January 2000, however, this effect is confounded by the addition of terminations from California, so we cannot be sure how much of the decline is due to participants starting a fresh 36-month period with a new three-month time limit. Terminations under the new 36-month period would have begun to occur in February or March 2000, and therefore some of the terminations recorded in those months may involve participants who were also terminated earlier. But as we have noted, neither the time series of participants presented earlier nor the terminations reported in this

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<sup>14</sup> Participants who qualified for and received a second three months of benefits during the first 36 months may be counted twice, in which case our estimate of 871,000 overstates the number of *participants* who were terminated. However, it is not clear that the states providing estimates of terminations always included those involving the second three months of benefits, which must be used consecutively and, therefore, may not be fully used in every case. Moreover, statistics provided by a few states suggest that only a small percentage of ABAWD participants qualified for and used the second three months of benefits. Of the ABAWD participants who were not meeting the work requirement, less than 5 percent were receiving their second three months of time-limited benefits. This figure is depressed by states that applied the time limit to a 36-month period measured with a fixed clock (see Chapter V). Fixed clocks were reset in December 1999, so the typical fraction of ABAWDs qualifying for their second three-month period in these states is higher than what we observed in March 2000. However, no state reported that more than 11 percent of its ABAWD participants who were not meeting the work requirement were receiving their second three months of benefits.



section suggest that there was more than a minimal return of participants who reached the three-month limit during the first three years after the ABAWD provisions were implemented. With little double counting of participants, we believe, the cumulative number reaching the time limit between the time the ABAWD provisions were implemented and March 2000 was about 934,000.

This estimate of cumulative terminations is sensitive to both the number of states in the underlying data series and the method of extrapolation. Extrapolating from just the six states that provided data on terminations for the entire time period suggests a somewhat lower cumulative number of terminations and a greater concentration in the first year. On the other hand, extrapolating from the states in proportion to their share of ABAWDs subject to the time limit rather than just those who were failing to meet the work requirement yields about a third *more* terminations.

How much confidence can we have that the extrapolation provides reasonable national estimates? There are several factors that invite confidence. First, it is evident in Figure II.5 that the six states with complete data show very similar profiles of terminations over the relevant time period, and this suggests that most other states would show similar profiles as well. Second, by using national shares as the basis for the extrapolation we reduce the impact of state variation. Third, the number of ABAWDs subject to the time limit and the number failing to meet the work requirement are clearly relevant to the number of ABAWD terminations. Fourth, the addition of the first five states with partial data has a fairly modest impact upon the estimates, even though the additional states account for about twice the share of the relevant national ABAWD populations as the first six (which account for just 5 or 6 percent of the national totals). Adding California for the final three months of the time series increases the overall coverage to

between 32 and 40 percent of the nation.<sup>15</sup> Fifth, the resulting estimates appear plausible in light of some of the trend data on ABAWD participation presented earlier. For the period encompassing the first three months of terminations, the estimated number of ABAWD participants dropped by about 240,000, or about 40,000 more than the preferred estimate of ABAWD participants who were terminated during that period. The residual decline is roughly consistent with the rate of decline in ABAWD participation preceding the first terminations.<sup>16</sup>

## **G. SUMMARY**

We estimate that in March 2000 there were 422,500 ABAWD participants in the FSP. Approximately 55 percent were living in nonwaived areas, and 51 percent—or 215,800—were subject to the three-month time limit. The balance of ABAWD participants in nonwaived areas, or just 4 percent of all ABAWD participants, were excluded with 15 percent exemptions. The remaining ABAWD participants, or 45 percent of the total, were residents of areas that were waived from the time limit because of high unemployment or insufficient jobs.

Participants defined as ABAWDs represented about 2.5 percent of all FSP participants during the same month. Nearly two-thirds of all participants were under 18 or over 50 and therefore excluded by age. Another 8.7 percent were certified as physically or mentally unfit for employment while 19.9 percent were responsible for dependent children. About 2.6 percent were exempt from FSP work registration for reasons other than those described here, and 0.5 percent were pregnant.

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<sup>15</sup> These percentages refer to national shares of ABAWDs not meeting the work requirement and all ABAWDs subject to the time limit.

<sup>16</sup> Recall that monthly estimates of ABAWD participants do not support very precise estimates of the month-to-month decline, and this limits what we can say about the relative importance of terminations versus other factors affecting the number of ABAWD participants at a point in time.

Due in large part to the cumulative impact of the time limit, ABAWD participants accounted for a much smaller share of all participants 18 to 50 in nonwaived areas—about 5.5 percent—than they did in waived areas, where they were 11.5 percent of the participants 18 to 50.

While the ABAWD provisions were expected to have a direct downward impact on the number of food stamp participants who are ultimately subject to them, they were implemented during a period of dramatic changes in participation. Along with the total caseload the number of ABAWD participants had begun to decline more than two years before the ABAWD provisions were implemented. Late in 1996 the number of ABAWD participants began a steep decline that reduced the caseload by more than 40 percent in less than a year. The decline continued at a reduced rate, and by late 1999 there was evidence that the ABAWD caseload had leveled off—at least a year sooner than the total caseload. While we estimate that at least half of the first-year decline may have occurred in the absence of the ABAWD provisions, the provisions themselves clearly had a direct and sizable impact on the exodus of ABAWD participants from the FSP.

In March 2000, just over half of the ABAWD participants who were subject to the time limit were meeting the work requirement. Nearly all who met the work requirement did so by working 20 or more hours a week or participating in workfare, but most of the workfare slots were in Los Angeles or New York. Elsewhere, roughly three-quarters of the participants who met the work requirement did so by working.

Compared with all participants 18 to 50, who were predominantly female, those who were subject to the ABAWD time limit were much more likely to be male, although females still accounted for nearly half of this group. Participants subject to the time limit also had shorter spells of participation, smaller household sizes, and lower unearned income. They were just as likely to have earnings, however. Participants who were meeting the work requirement differed in relatively minor ways from those who were not meeting the work requirement when we

compared demographic characteristics. They had longer spells of participation and lived in somewhat larger households than participants who were not meeting the work requirement. They were also more likely to have earnings. Some participants who were not meeting the work requirement nevertheless had earnings as well, but they fell short of the 20 hours needed to meet the work requirement.

In the first few months that ABAWDs began to exhaust their time-limited benefits, we estimate that nearly 200,000 were terminated. By March 2000 the total number who reached the three-month time limit and were terminated had grown to more than 900,000. There is little indication that very many of those who lost their benefits during the first 36 months that the time limit was in place returned to the FSP to receive additional benefits under a new clock.

### **III. WHO IS SUBJECT TO THE TIME LIMIT? VARIATION IN STATE POLICIES**

Following the implementation of PRWORA, states had broad latitude in determining who is subject to the ABAWD time limit. More specifically, states had policy options in three areas: (1) how to interpret federal law on who can be exempt from ABAWD provisions, (2) whether to apply for waivers from the time limit in areas of high unemployment and insufficient jobs, and (3) whether and how to use the 15 percent exemption, created by the BBA, which allows states to exempt up to a federally allotted number of additional persons using criteria of their choosing. The options for exemptions in the first area came about primarily because there were no final regulations on the ABAWD provisions for several years after PRWORA was passed. FNS did issue guidance to states on ABAWD policies soon after PRWORA was passed (USDA 1997), and FNS published proposed regulations in December 1999. However, state flexibility to interpret federal law regarding who is subject to the ABAWD provisions remained broad until the final regulations were published in January 2001. The regulations, which have to be implemented by all states on or before October 1, 2001, remove most of the states' flexibility in the first area but do not reduce their options regarding waiver and 15 percent exemption policies.

This chapter describes the variation in state ABAWD policies as they existed in March 2000 and discusses how the policies are expected to change as states implement the final regulations. We explain how states have defined who is exempt from the ABAWD time limit, how they have elected to use waivers, and how they have implemented the 15 percent exemption. We also examine to what extent states' ABAWD policies reflect a uniform motivation and how this may change in the future. Appendix C provides details of states' ABAWD policies. The information reported here comes mainly from the State Food Stamp Program Director Survey.

## **A. STATE POLICIES ON EXEMPTIONS FROM THE TIME LIMIT**

Until the final ABAWD regulations were issued, policies exempting individuals from the time limit were left largely to the discretion of the states. More specifically, states could define (1) whether adults became exempt at age 50 or 51, (2) how eligibility workers certify individuals as unfit for employment, and (3) which adults are exempt by the presence of dependent children. PRWORA also exempts from the time limit pregnant women and individuals who are already exempt from FSP work registration, but neither of these exemption criteria varies by state. Shortly after the ABAWD provisions took effect, USDA advised states to consider as exempt all pregnant women regardless of the trimester of pregnancy, and every state adopted that policy. This provision is part of the final ABAWD regulations. Likewise, USDA establishes rules on work registration exemptions, and these rules do not vary by state. As a result, policies on pregnancy and work registration exemptions are not discussed in this chapter.

The State Food Stamp Program Director Survey provides information on each state's policy on exemptions. While most policies apply statewide, some states leave the decisions to counties, local offices, or individual eligibility workers. For instance, in California and New York, the counties set most of the policies on how eligibility workers certify individuals as unfit for employment. Our information on these states comes from the findings of the county FSP administrator surveys.<sup>1</sup> The District of Columbia, which is covered entirely by a waiver, has almost no policies on the exemptions of ABAWDs, so it is excluded from the discussion of exemptions.

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<sup>1</sup> Counties also made some policy decisions regarding ABAWDs in North Carolina and Alabama, however, most of the policies in these states were set by the state.

## **1. Age at Which Adults Become Exempt**

According to PRWORA, the time limit applies only to adults between the ages of 18 and 50; individuals younger than 18 and older than 50 are exempt. This provision makes it clear that individuals are no longer exempt as of their 18<sup>th</sup> birthday. However, the provision is not as clear on the upper age limit. Is an adult technically older than 50 on his or her 50<sup>th</sup> birthday, or not until his 51<sup>st</sup> birthday? USDA issued guidance on this topic, recommending that states consider adults as exempt on their 50<sup>th</sup> birthday.

Forty-one states have policies consistent with this guidance, while five states do not exempt adults until their 51<sup>st</sup> birthday. Four other states—Kansas, Maryland, Pennsylvania and West Virginia—use their 15 percent exemption to effectively lower the maximum age at which adults are subject to the time limit by two to five years (Figure III.1).

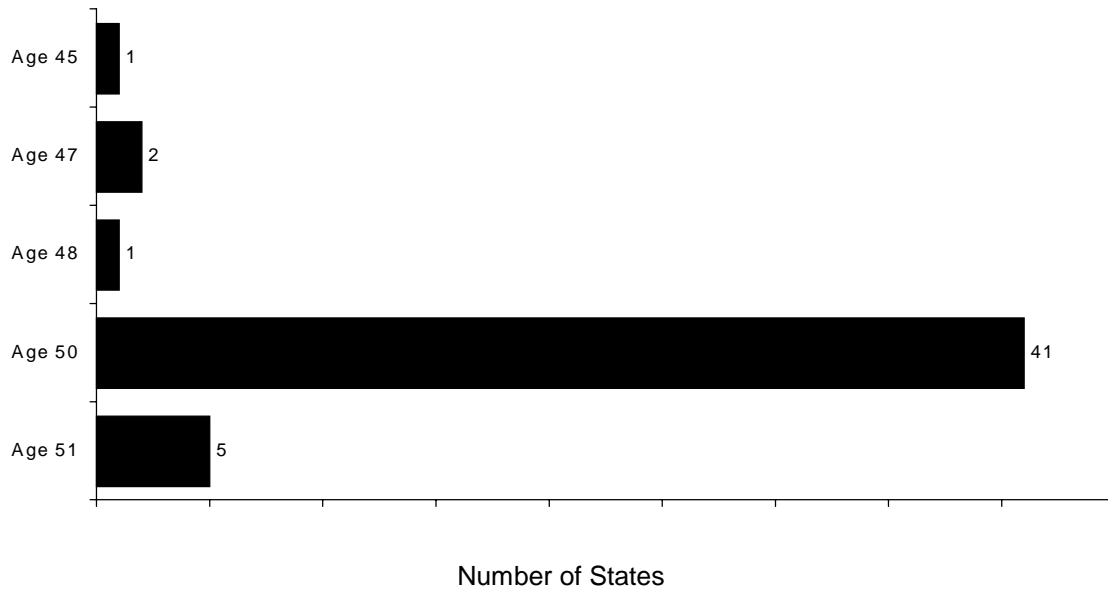
The final USDA regulations retain the policy that adults become exempt on their 50<sup>th</sup> birthday. As a result, the five states that delay exemption until the 51<sup>st</sup> birthday will need to revise their policies, a change that is likely to cause a slight decrease in the number of ABAWDs. The four states that lower the maximum age through their use of the 15 percent exemption can continue to do so.

## **2. Certified as Unfit for Employment**

Under PRWORA, adults are exempt from the time limit if they are “medically certified as physically or mentally unfit for employment.” Before the final ABAWD regulations were issued, states could determine how adults were certified as unfit for employment and how frequently these certifications were reviewed. The final ABAWD regulations specify that unfitness needs to be verified only if the eligibility worker is uncertain that the individual is disabled—a policy already in effect in 35 states. States still have some flexibility to determine

FIGURE III.1

DISTRIBUTION OF STATES BY THE AGE ADULTS BECOME EXEMPT FROM TIME LIMITS



SOURCE: State Food Stamp Program Director Survey

how to certify individuals whose disabilities are not evident. States can also determine how often certifications are reviewed.

**a. Methods of Certifying Unfitness for Employment**

States used one or more of the following methods to certify an individual as unfit for employment:

- Checking that disability-based benefits are received
- Obtaining written or verbal certification from a health professional
- Directly observing the ABAWD
- Accepting an individual's word about being disabled



Whether or not these methods are used and how they are used varies from state to state. In California and New York, they vary by county.

**Checking for the Receipt of Disability-Based Benefits.** Every state certifies individuals as unfit for employment if they receive certain disability-based benefits. In nearly all states, qualifying benefits include SSI, disability-based Social Security, disability-based General Assistance (GA), some Veterans' benefits, and some Railroad Retirement benefits (Figure III.2). It is not surprising that states use these particular benefits to certify individuals as unfit for employment because they are the same five benefits used to identify which FSP clients should be subject to FSP eligibility rules that apply to people with disabilities.

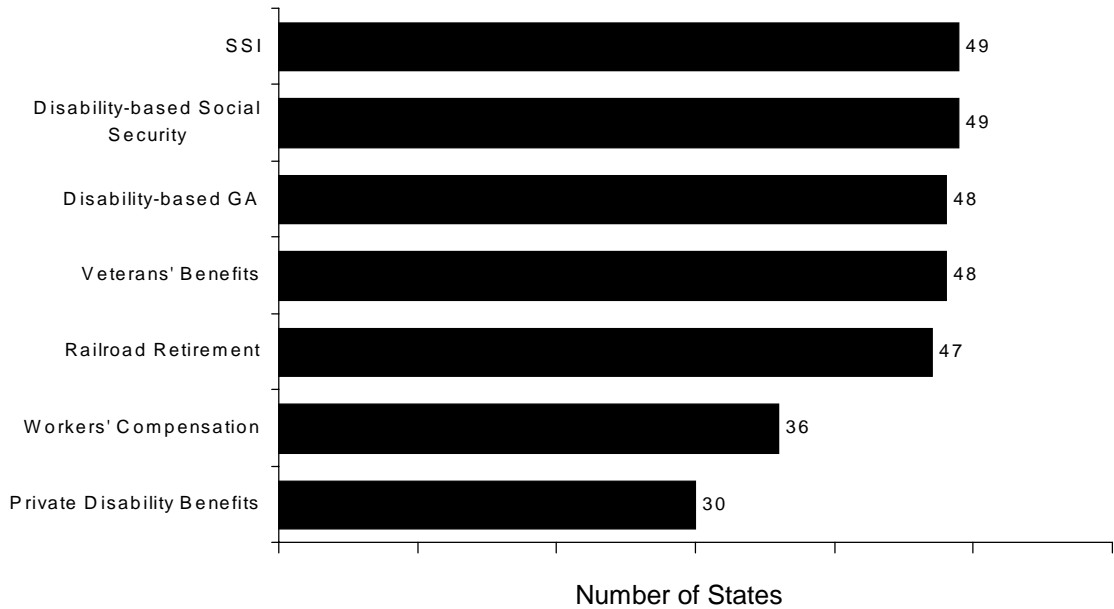
Only three states do not automatically certify individuals as unfit for employment if they receive any one of these five benefits. One of these states leaves the decision about which benefits to use to the discretion of eligibility workers. The other two states certify a person as unfit for employment on the basis of some, but not all, of these benefits.

Many states consider benefits other than the five used in the FSP disability definition to certify someone as unfit for employment under the ABAWD provisions. For example, 36 states use workers' compensation benefits, and 30 states use private disability benefits. Five states do not have a statewide policy on which disability benefits in addition to the five associated with the FSP disability definition can be used in certification but, rather, allow the local offices to choose other benefits as the basis for certification. Twenty-seven states certify unfitness on the basis of all five of the disability benefits used in the FSP disability definition plus workers' compensation and private disability benefits.

The final ABAWD regulations explicitly require states to accept the receipt of "temporary or permanent disability benefits issued by governmental or private sources" as certification that an

FIGURE III.2

DISTRIBUTION OF STATES BY THE DISABILITY BENEFITS THAT QUALIFY INDIVIDUALS AS UNFIT FOR EMPLOYMENT



SOURCE: State Food Stamp Program Director Survey

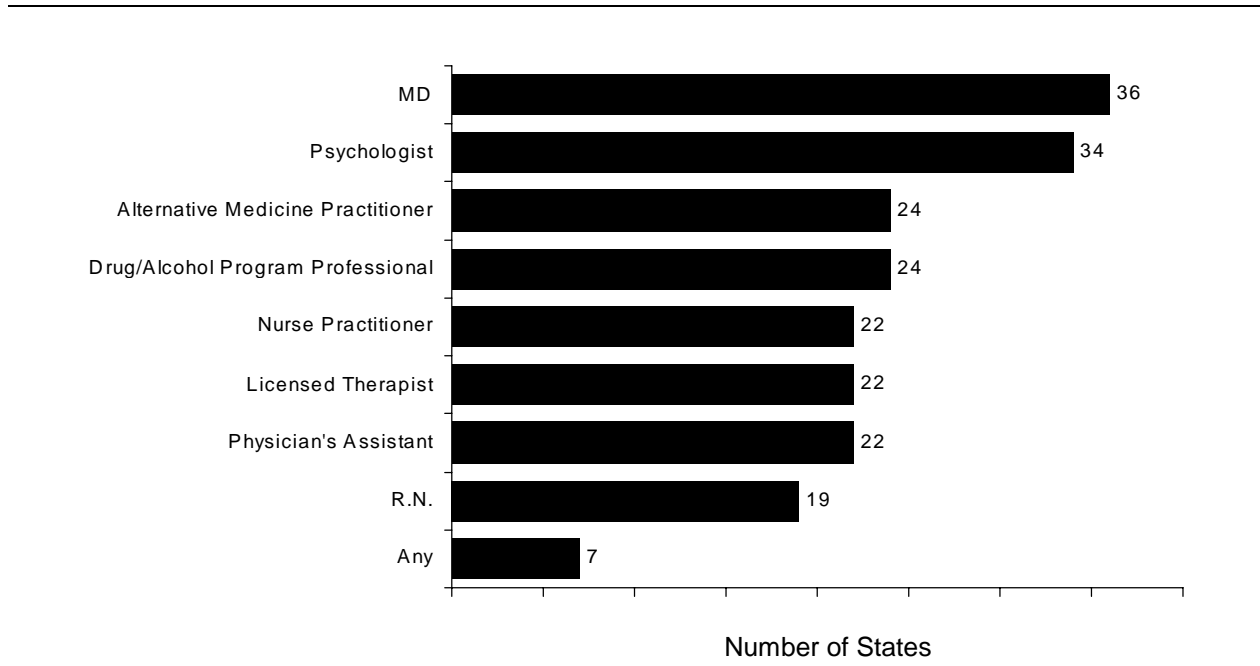
individual is unfit for employment. At least 22 states will have to change their policies to comply with the regulations.<sup>2</sup>

**Certification by Health Professionals.** Most states (36) have statewide policies on which health professionals can certify an adult who is not receiving any of the accepted disability benefits to be unfit for employment. Each of these states accepts medical certification from an M.D., and all but two accept medical certification from a licensed/certified psychologist (Figure III.3). Other professionals that can provide certification include drug or alcohol treatment program administrators, nurse practitioners, licensed therapists, physician's assistants, and

<sup>2</sup> An additional 13 states do not accept state disability benefits as certification, but many of these states may not have state disability programs.

FIGURE III.3

TYPES OF HEALTH PROFESSIONALS WHO CAN CERTIFY UNFITNESS FOR EMPLOYMENT<sup>a</sup>



SOURCE: State Food Stamp Program Director Survey

<sup>a</sup>14 states have no statewide policy and no common local policy affecting the majority of ABAWDs.

registered nurses. Many states also accept certification from practitioners of alternative medicine, such as acupuncturists and chiropractors. Seven states accept certification from any health professional.

Most of the 36 states accept certification from more than one type of health professional, and 21 states accept certification from six or more. However, 10 states accept certification from only two or three types of health professionals—typically from M.D.s and licensed psychologists. The 14 states without statewide policy on certification by health professionals leave the decision about who can provide medical certification of a disability to county FSP officials and/or to eligibility workers.

States also vary with regard to the form of certification they will accept from a health professional. While all 50 states accept a written statement from health professionals, 6 states

have a form that health professionals must use, and the remaining 44 accept any written statement. In addition, 17 states also accept verbal certification from health professionals.

The final ABAWD regulations specify that medical certification from a health professional is required only when “the unfitness is not evident to the eligibility worker.” Furthermore, the regulations explicitly allow certification from a “physician, physician’s assistant, nurse, nurse practitioner, designated representative of the physician’s office, a licensed or certified psychologist, a social worker, or any other medical personnel the state agency determines appropriate.” The 32 states that accept certification from a more limited set of health professionals or have no state policy will have to change their certification policy to comply with federal law. This will exempt more adults from the ABAWD provisions. However, the regulations do not specify whether the certification should be written or verbal, so no state will have to change this aspect of its certification policy.

**Eligibility Worker Observation.** In most states (35), eligibility workers can certify an individual as unfit for employment if a mental or physical disability is evident.<sup>3</sup> In this case, the individual does not need to be receiving disability benefits or to obtain certification from a health professional. The final ABAWD regulations also permit certification on the basis of direct observation by eligibility workers. This is likely to increase the number of individuals exempted from the time limit in the 15 states that currently do not allow certification based on direct observation.

**Client Self-Report.** In 16 states, eligibility workers can certify an individual as unfit for employment based solely on the individual’s self-report about being disabled. In addition, some counties in New York certify on the basis of self-report. In either case, the eligibility worker does not need any proof of disability. These states and the counties in New York will have to

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<sup>3</sup> Additionally, in California and New York, some localities allow eligibility workers to certify on the basis of direct observation.

change their policy to comply with the final ABAWD regulations, which specify that a self-reported disability must also be evident to the eligibility worker to qualify as the basis for a disability certification. If it is not, the client must provide proof. This may lead to fewer exempt adults in these states.

## **b. Reviewing Certifications**

Most states require eligibility workers to periodically review the certification of unfitness. Such reviews are more common when a client is certified as unfit because of a temporary, rather than a permanent, disability. In the review, the client must prove by any of the acceptable means (evidence of receipt of disability benefits, certification from a health professional, etc.) that he/she is still mentally or physically unfit for employment.

Two states do not consider individuals with temporary disabilities to be unfit for employment (Indiana and Missouri). Of the remaining 48 states, 41 have policies governing when eligibility workers must review certifications of individuals with temporary disabilities. Typically, the review is conducted when the client recertifies for FSP benefits, on the date recommended by a health professional, or after “a change in circumstances,” whichever comes first. A change in circumstances may include a change in health status, income status, or household composition. A small number of states leave the decision about review timing to the eligibility worker, and four other states require periodic reviews for all people with temporary disabilities.

For individuals with permanent disabilities, 34 states specify if or when eligibility workers must review certifications.<sup>4</sup> Three of these states do not require any review of certifications based on permanent disability; the remaining 31 states require some periodic reviews. As with

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<sup>4</sup> In California and New York, some localities have policies on reviewing certifications based on permanent disabilities.

temporary disabilities, certifications for permanent disabilities are reviewed at FSP benefit recertification, on the date recommended by a health professional, or after a change in circumstances. The final regulations continue to give states the discretion to determine the frequency with which certifications for both types of disabilities are reviewed, but they explicitly require states to accept the receipt of temporary disability benefits as evidence of unfitness for employment.

### **3. Exemptions Based on Dependent Children**

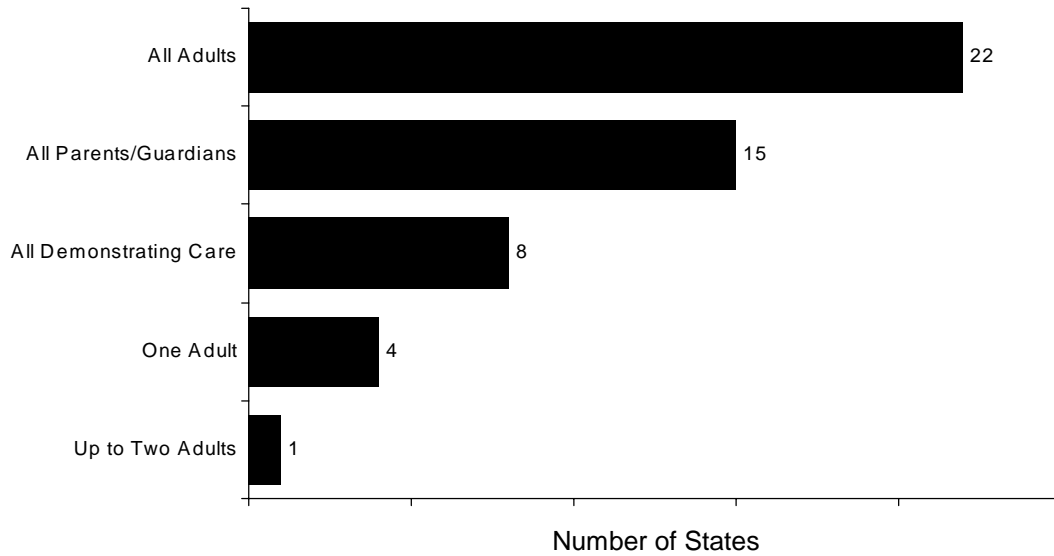
PRWORA exempts from the FSP time limit all adults who care for dependent children. Until the final ABAWD regulations were issued, states could set the age at which children were no longer considered dependent. States could also set the standard for determining which adults in a household were considered to be caring for a dependent child, and they could establish the number of those adults that can be exempt. The final regulations specify that children are considered dependent until their 18<sup>th</sup> birthday, and that all adults in a household are exempt from the time limit if a child who has not reached his or her 18<sup>th</sup> birthday is present in the household (even if the child is not eligible for food stamps).

To comply with the final regulations, six states must change the maximum age at which children are no longer considered dependent. Montana, North Dakota, and Pennsylvania consider children dependent until their 17<sup>th</sup> birthday. Alaska considers children to be dependent until their 6<sup>th</sup> birthday, and Rhode Island, until their 7<sup>th</sup> birthday, consistent with the TANF rules in both states. In Nebraska, the policy on maximum age is established at the local level, and we do not know how many localities set the maximum below 18 years.

In 22 states, the policy on which adults are exempt from the time limit is consistent with the final ABAWD regulations: all adults in a household are exempt if a dependent child is present regardless of their relationship with the child or their role vis-à-vis the child (Figure III.4).

FIGURE III.4

NUMBER OF ADULTS EXEMPT IF DEPENDENT CHILD IS PRESENT



SOURCE: State Food Stamp Program Director Survey

However, the remaining 28 states will need to change their policy to comply with the regulations. In 15 states, only parents or guardians of a dependent child are exempt; in 8 states, only adults who can demonstrate that they are responsible for caring for a dependent child are exempt. Four states—Pennsylvania, Rhode Island, New York, and Florida—exempt only one adult per household. In Pennsylvania and Rhode Island, that adult must be the parent or guardian of the child; in New York, the person can be any adult who demonstrates responsibility for caring for the child; and in Florida, the household chooses which adult is exempt. Finally, Oregon exempts up to two adults when a dependent child is present (if more than two adults are in a household, the family chooses which two are exempt). In these 28 states, the final regulations will lead to an increase in the number of adults who are exempt on the basis of dependent children in the household. We can quantify the impact by simulating the new policy with FSPQC data and comparing the results with an alternative simulation based on current

policy. Using this methodology, we estimate that compliance with the federal regulations will redefine as many as 38,000 ABAWD participants to be non-ABAWDs, and we estimate that as many as 22,000 or more than half of these participants are in nonwaived areas.<sup>5</sup>

## **B. WAIVERS FOR AREAS WITH HIGH UNEMPLOYMENT AND INSUFFICIENT JOBS**

The use of waivers is another aspect of the ABAWD provisions in which state policy can vary. States can ask USDA to waive the work requirement and time limit for people who live in an area with an unemployment rate over 10 percent or with insufficient jobs. Not all states that could have qualified for waivers in FY00 chose to apply for them, however. Because states must actively seek waivers, the absence of waivers may reflect an explicit state policy decision not to eliminate the ABAWD time limit for at least some adults who would otherwise be subject to it.

In March 2000, 37 states and the District of Columbia had waivers in effect, which are usually approved for one year.<sup>6</sup> The waiver in the District of Columbia is unique because it covers the entire District, so no one there is subject to the time limit. Alaska's waivers, also unique, are in effect only during the winter and spring months, and the months vary by county.

The absence of waivers may reflect either a state's reluctance to exempt ABAWDs or the existence of healthy economic conditions, with no area qualifying for waivers. To ascertain how often the latter condition occurred, we determined whether the states that did not have waivers in effect in March 2000 had areas that were designated as LSAs—the most common criterion by which areas qualified for waivers. Ten of the 13 states with no waivers had multiple LSAs in

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<sup>5</sup> The FSPQC data will not support a simulation of the policy changes affecting certification of unfitness for employment.

<sup>6</sup> California had a small number of areas with waivers in place during the previous 12 months (Appendix Table C9), but these expired before March 2000 and were not renewed.



2000.<sup>7</sup> In these 10 states, the absence of waivers seems to reflect an unwillingness to exempt ABAWDs from the time limit through this mechanism.

In states with waivers covering only Indian reservations, it is not clear what this pattern reflects about state policy. In March 2000, three states—Idaho, Nebraska, and Wyoming—had waivers only for Indian reservations. Because all three of these states had multiple LSAs outside of the reservations, the observed waiver patterns may reflect Indian reservation preferences more than state policy.

Most states with waivers implemented all that were approved; only New York and Washington did not. The primary reasons cited for this choice include (1) an improvement in economic conditions in the covered area(s) since the time of application and (2) a choice by local Program agencies not to implement after the waiver application. The waivers not implemented in New York included New York City, which accounted for nearly two-third of the state's ABAWD population.

### **C. THE 15 PERCENT EXEMPTION**

The BBA allows states to exempt some ABAWDs who would otherwise lose eligibility under PRWORA. For each state, USDA estimates the maximum number of persons who can be exempted under this provision. This estimate, known as the 15 percent exemption *allotment*, is intended to equal 15 percent of persons currently ineligible for the FSP because of the ABAWD provisions. Whether the exemption is used by states, the extent to which it is used, and the criteria for determining who is eligible for the exemption are matters of state discretion.

As of March 2000, 35 states were using the 15 percent exemption (an additional 6 states planned to use it in the coming year). Most states implemented the 15 percent exemption

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<sup>7</sup> Delaware, Iowa, and New Hampshire had no LSAs. The information on these and the other 10 states is based on data provided by the Center for Budget and Policy Priorities.

statewide. Twenty-four of the 35 states use the exemption in every county not covered by a waiver. Most of the remaining 11 states do not use the 15 percent exemption in some counties because the extent of employment and/or the opportunities to participate in qualifying work activities in those counties is sufficiently high. California and New York do not have a statewide policy on how to use the exemption, so each county makes its own decision on whether and how to use the exemption.

The 15 percent exemption policy was intended to be flexible and vary by state, and this flexibility is retained in the final regulations. As a result, states will continue to vary in the type and number of ABAWDs covered by the exemption.

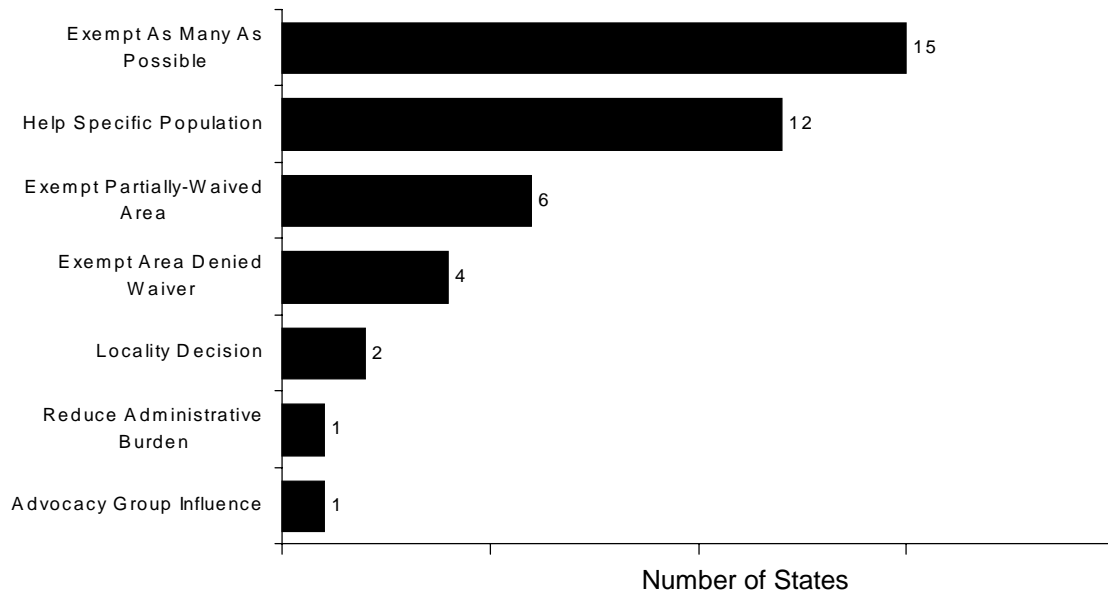
### **1. Reasons for Using the 15 Percent Exemption**

States cited a variety of reasons for using the 15 percent exemption (Figure III.5). Fifteen states indicated that a primary goal is to exempt as many adults as possible. Twelve states reported that a primary goal is to assist a specific population (homeless individuals, for example, are exempt in some states). Six states use the exemption to ease the administrative burden of partially waived counties by exempting individuals residing in the nonwaived portion of these counties. Four states exempt individuals residing in areas that were denied waivers.

Fifteen states did not use the 15 percent exemption in March 2000, and their reasons varied as well. Three states indicated that there were enough jobs and/or qualifying work slots to accommodate ABAWDs. Three states wanted to be consistent with their TANF work requirements, which do not have broad exemptions like the 15 percent exemption. Four states did not use the exemption because of “political reasons,” and five states indicated that the policy was too difficult to monitor.

FIGURE III.5

REASONS FOR USING THE 15 PERCENT EXEMPTION<sup>a</sup>



SOURCE: State Food Stamp Program Director Survey

<sup>a</sup>Thirty-five states used the 15 percent exemption in March 2000; a few states indicated multiple reasons for using the exemption.

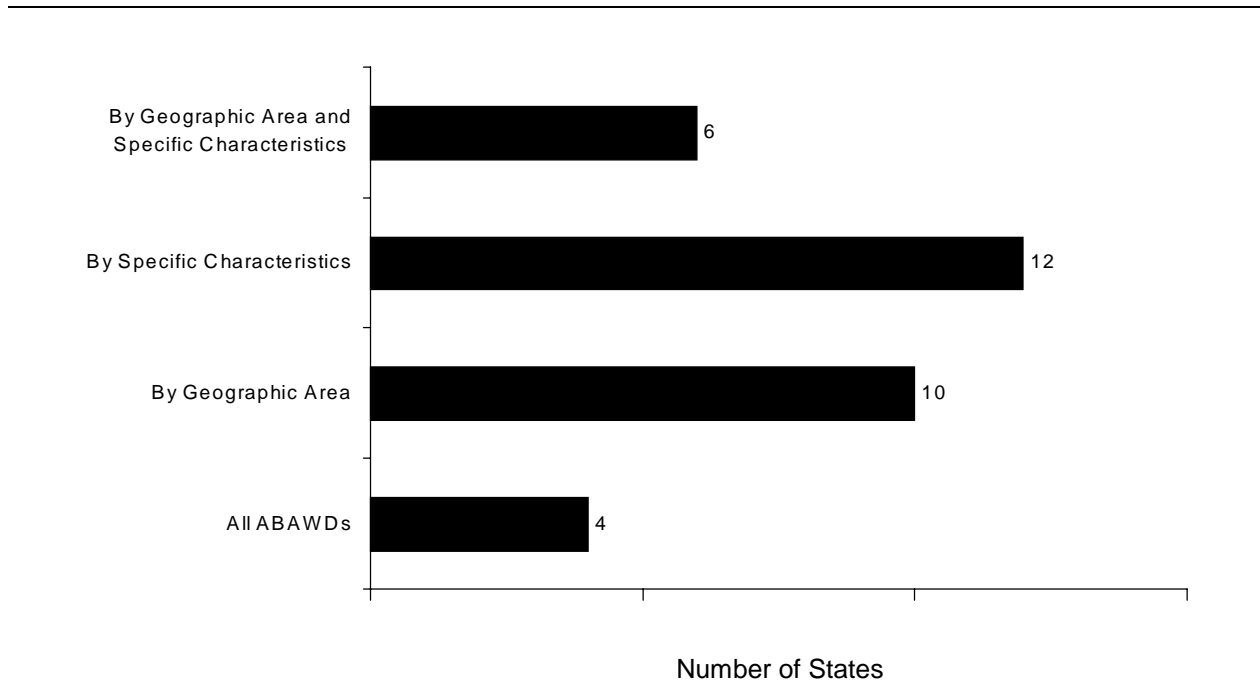
Six of the 15 states that did not use the 15 percent exemption in March 2000 indicated that they intend to use it in the future. One of these states—Alabama—began using the exemption before the end of FY00.

## 2. Eligibility Criteria for the 15 Percent Exemption

The decision on the eligibility criteria for the 15 percent exemption is left entirely to the states, and the variation in policy is wide, not only in terms of who is eligible but also in terms of the how long people remain eligible. Some states consider all ABAWDs subject to the time limit eligible (Figure III.6). Other states use specific geographic or individual characteristics to determine eligibility.

FIGURE III.6

15 PERCENT EXEMPTION ELIGIBILITY CRITERIA<sup>a</sup>



SOURCE: State Food Stamp Program Director Survey

<sup>a</sup>15 percent exemption policy varies by county in three states, which are not included in this figure.

Four states consider all ABAWDs who exceed their time limit to be eligible under the 15 percent exemption, but for different lengths of time. For instance, in Arkansas and Illinois, every ABAWD who exceeds the three-month time limit can continue to receive benefits indefinitely under the exemption, effectively eliminating the time limit. In Missouri and Tennessee, every ABAWD who exceeds the three-month time limit can receive benefits for two additional months under the 15 percent exemption, effectively changing the time limit from three to five months.

However, most states that use the 15 percent exemption have specific eligibility criteria for the exemption. In 16 states, ABAWDs can qualify for a 15 percent exemption if they reside in certain areas. For example, several states exempt all ABAWDs in counties that are partially waived or in areas where the economy and transportation resources are poor, or where E&T programs are few or nonexistent. Eighteen states consider ABAWDs with certain characteristics

to be eligible for the 15 percent exemption. For example, these states might exempt the homeless, and individuals with inadequate transportation, with health problems, and those deemed unemployable or over a certain age (e.g., Kansas exempts all adults over age 45). Six states use both geographic and personal characteristics to determine eligibility for the 15 percent exemption.

States also have discretion on how long an individual can be exempted under the 15 percent exemption, and there is some state-to-state variation in this policy as well. In 26 states, individuals eligible for a 15 percent exemption remain exempt for as long as they meet the criteria. Three other states—Mississippi, Missouri, and Tennessee—limit the number of months in which an individual can remain exempt under 15 percent exemption. Missouri and Tennessee provide two extra months of benefits to all ABAWDs who exceed the three-month limit; Mississippi exempts for six months all individuals waiting for a place in an E&T program. In the remaining three states, eligibility workers determine the length of the exemption. In two of these states, the length of the exemption varies depending on which eligibility criteria are applicable.

Five states—Connecticut, Georgia, Indiana, Oregon, and Pennsylvania—intended to broaden their 15 percent exemption criteria in the coming year. Connecticut and Oregon planned to cover more nonwaived counties. Georgia and Pennsylvania intended to make more types of individuals eligible for the exemption, such as homeless individuals or persons with insufficient transportation. Indiana expected to extend the time limit for all ABAWDs.

### **3. Extent to Which States Use Their Allotments of 15 Percent Exemptions**

The BBA requires that the number of 15-percent exemptions allocated to each state be based on 15 percent of the estimated number of individuals in the state who have been denied eligibility for food stamp benefits solely because of the ABAWD provisions. As specified in the law, FNS estimated this number for FY98 on the basis of both FSPQC data for FY96 and

projected FY98 caseloads. For each subsequent fiscal year, the FY98 number was updated to reflect changes in the states' FSP caseloads and any changes in the population covered by waivers—again, as specified in the law. FNS provides each state with an allotment of average monthly exemptions. Any unused exemptions can be carried over to the next fiscal year. Each state submits to FNS—on Form FNS 583—a quarterly report of the number of exemptions used.

The allotment of new 15 percent exemptions nationwide (not including exemptions carried over from previous years) varied over the three fiscal years from about 63,500 per month to 69,000 per month (Table III.1). Two key factors affect the size of the new allotment: (1) the size of the FSP caseload and (2) the size of the population covered by waivers. From FY98 to FY00, both the FSP caseload and the estimated population covered by waivers decreased. Initially, the effects of the decline in the estimated population covered by waivers more than offset the effects of the reduction in the FSP caseload, leading to an increase in the new allotment from FY98 to FY99. More recently, the drop in the estimated population covered by the waivers did not offset the decrease in the FSP caseload, leading to a decrease in the new allotment of 15 percent exemptions from FY99 to FY00.

Although states are using an increasing number of 15 percent exemptions, they used only a small fraction of the 15 percent exemptions available to them from FY98 through FY00. Collectively, the states used only about 8 percent of the total available 15 percent exemptions (the allotment plus the carryover from the previous year) in any of the three years. Even if we ignore the carryover from previous years, the states used only 14 percent of the allotment in FY99 and 21 percent of the allotment in FY00.

Although more states are using the 15 percent exemption, 14 states were still not using it by the end of FY00. And even the states that were using it used only a small fraction of the total available allotment—12 percent or less in FY99 and FY00. Figure III.7 shows the distribution of states by the percentage of the allotment plus carryover used in FY99. Nineteen states used less

TABLE III.1

## AVERAGE MONTHLY ALLOTMENTS OF 15 PERCENT EXEMPTIONS AND THEIR USE

	FY98	FY99	FY00
New Allotment (Without Carryover)	63,570	69,092	65,720
Unused Exemptions From Previous Year	- <sup>a</sup>	58,301	118,041
Total Allotment (With Carryover)	63,570	127,393	183,265 <sup>b</sup>
Number of States That Use 15-Percent Exemption	22	33	36 <sup>c</sup>
Exemptions Used	5,269	9,352	13,970
As percent of new allotment	8.3%	13.5%	21.3%
As percent of total allotment	8.3%	7.3%	7.6%
As percent of total allotment in those states that use exemption	20.9%	12.0%	11.9%

SOURCE: Form FNS-583, Memoranda to Regional FSP Directors from Arthur Foley (FNS website)

<sup>a</sup>As the 15 percent exemption policy was first introduced in FY98, there were no unused exemptions from FY97.

<sup>b</sup>The total allotment of exemptions given to Minnesota in FY00 was calculated using data on the number of exemptions used in FY99 that was subsequently revised. Hence, for FY00, the national total allotment with carryover is not exactly equal to the allotment without carryover plus unused exemptions from the previous year.

<sup>c</sup>Alabama began using the 15 percent exemption after March 2000.

than 10 percent of the FY99 allotment. Of the two states that used their allotments to exempt all ABAWDs in nonwaived areas, Arkansas used only 19 percent and Illinois used only 41 percent of its FY99 allotment. Only one state, Louisiana, used more than 50 percent of its allotment in FY99. In fact, Louisiana was unusual in that it used more than 100 percent of its allotment in both FY98 and FY99 (it used slightly less than its allotment in FY00).

Louisiana's use of more than its entire allotment in FY98 and FY99 reflects, in part, one of the difficulties associated with applying the 15 percent exemption to geographic areas. Part of the rationale for applying the 15 percent exemption to entire areas is to be able to treat them like federally waived areas, in which there is no need to keep track of time-limited months of benefit receipt. Indeed, the regulations specifically allow the states to count all of the ABAWDs in exempted areas when reporting the number of exemptions used rather than determining and then excluding the number who were meeting the work requirement or in their first three months of

FIGURE III.7

PERCENTAGE OF 15 PERCENT EXEMPTION ALLOCATIONS  
USED BY THE STATES, FY99



SOURCE: State Food Program Director Survey

time-limited eligibility. But employing this simplification results in states using up exemptions unnecessarily. Indeed, we estimate that as many as a third of the 15 percent exemptions reported in March 2000 may have been used on participants who would have been eligible to receive food stamps without the exemption.<sup>8</sup> It is likely that Louisiana could have avoided exceeding its FY98 and FY99 allotments by limiting its exemptions to those participants in the exempted counties who were neither meeting the work requirement nor still using their first three months of eligibility. But to do so would have increased the cost of administering the 15 percent exemption.

<sup>8</sup> We assumed that participants with time-limited benefits remaining accounted for 30 to 50 percent of the exemptions reported by states that use a geographic basis alone to apply the exemption, 15 to 25 percent of the exemptions reported by states that use both geographic and individual criteria, and none of the exemptions reported by states that use individual criteria alone.



#### **4. Reasons for Using Fewer Exemptions Than Allotted**

To determine why states use such a small share of the 15 percent exemptions available to them, we asked the respondents in the State Food Stamp Director Survey whether the state planned to use its full allotment of exemptions in FY00 and, if not, why not. We also asked whether the state had used the same, more, or fewer exemptions than they had planned in FY99 and, if they had not used the same number of allotments as planned, why the actual use differed from the planned use.

About half the states that were using the 15 percent exemption reported that they aimed to use all of their allocation in FY00. That only one state approached full use in FY00 underscores the difficulty of using all the available exemptions even when motivated to do so. The responses to our questions suggest three reasons why states have used such a small proportion of their allotment. First, the allotments in some states far exceed the number of ABAWDs that could be covered by the 15 percent exemption. Second, states overestimated the number of exemptions they would use. Third, some states did not want to use their full allotment.

##### **a. Allotments Exceed the Covered Population**

Some respondents reported that they *could not* use all their available exemptions because the number of ABAWDs who would qualify is smaller than the number of available exemptions. In fact, respondents in nine states said they could not use all their 15 percent exemptions even if they exempted every ABAWD who lost eligibility because of the time limit. Data on the number of unused exemptions in FY00 support this contention. In 24 states, the average monthly number of unused exemptions exceeded the number of ABAWDs not meeting the work requirement in March 2000. Hence, if every ABAWD lost eligibility in the subsequent month, the state could cover each ABAWD with a 15 percent exemption and still have exemptions left over.

However, point-in-time estimates of ABAWDs potentially eligible for a 15 percent exemption ignore the fact that ABAWDs require one exemption for each month that they are covered. When we account for the dynamic aspect of the 15 percent exemptions, we still see that the total 15 percent exemption allotment remains high relative to the 2000 ABAWD population. In March 2000, about 29,000 ABAWDs were in their final month of the time limit and would not be able to receive food stamps in the next month. This would make them part of the population covered by the 15 percent exemption as expressed in the law. If such persons remained otherwise eligible for food stamps for an average of six months, the average monthly covered population would be 174,000. Fifteen percent of that population would equal 26,100, but this is only two-fifths of the new allotment in FY00 and only 14 percent of the *total* allotment in FY00. These estimates of the covered population are low because they are restricted to those who remain continuously eligible in every respect except for their exhaustion of time limited benefits. If we confine our attention to this population, it appears that the allotments are indeed large relative to 15 percent of this population—even more so in some states than others.

The high number of allotments is in part the result of an overestimate of the number of persons who are denied benefits as a result of the ABAWD provisions. The original estimate of the number of allotments is based on the proportion of ABAWDs who were not meeting the work requirement in FY96 and on the estimated proportion of these individuals who had failed to meet the requirement for at least three months. However, the implementation of the time limit as well as the growing economy may have changed the behavior of participants, rendering the initial assumption incorrect. In addition, while the law specifies that the allotments be adjusted in proportion to changes in the caseload, the number of ABAWD participants has declined more rapidly than the total caseload (see Chapter II), resulting in too small a reduction in the annual allotments.

A second reason for the high number of allotments is that states did not use the exemptions when the policy was first introduced, so the carryover of exemptions from previous years has been large. The carryover of 15 percent exemptions nearly doubled the total availability of 15 percent exemptions in FY99 and nearly tripled it in FY00.

In addition, another factor cited by advocacy groups as a reason for the high number of allotments is that many of those who would have qualified for benefits under the 15 percent exemption left the program after using up their time-limited benefits. Without special outreach efforts, these former participants would not be aware that they could qualify, potentially, for additional food stamp benefits under the 15 percent provision.

**b. States Overestimated the Number of Exemptions They Would Use**

The number of exemptions used by some states fell short of the number they had planned to use. Twelve of the 33 states that used the 15 percent exemption in FY99 had planned to use more exemptions but incorrectly estimated the number of ABAWDs who would meet the criteria for the 15 percent exemption. In some states, changes in the economy, in the availability of qualifying work activities, or in the extent to which ABAWDs were encouraged to participate in qualifying work activities caused the actual number of ABAWDs who met the criteria for the 15 percent exemption to fall short of the estimated number of exemptions that would be used.

Only two states used more exemptions than planned. In New York, which has a county-administered FSP, the counties used more than the state expected them to use. In Louisiana, the state agency underestimated the number of ABAWDs in the areas in which the 15 percent exemptions were used.

### c. States Did Not Want to Use the Full Allotments

Some states did not want to use the full allotment of 15 percent exemptions. Respondents in 10 of the 35 states that used the exemption in March 2000 said they did not *want* to use their full allocation.<sup>9</sup> When asked to elaborate, they offered the following explanations:<sup>10</sup>

- ***Sufficient Jobs, Workfare, or Other Qualifying Work Activities.*** Respondents from six states said that jobs, workfare, or slots in other qualifying work activities could accommodate all ABAWDs subject to the work requirement.
- ***Difficulties Choosing Criteria.*** One respondent in a state where the FSP is county-administered reported that counties had difficulty in designing criteria for the exemption of ABAWDs.
- ***Reserving for an Economic Downturn.*** One respondent said that his state was saving exemptions in case of an economic downturn in the state.
- ***To Guard against Using Too Many.*** One respondent reported that his state was using the exemption for the first time and therefore wanted to be cautious in applying it.

### D. SUMMARY OF STATE ABAWD POLICIES

ABAWD time limit policies vary from state to state, and in some cases from county to county. States use different rules to exempt individuals because of age, disability, and dependent children. More important, states vary in their use of both the broad waiver and 15 percent exemption policies. As a result, the number and types of ABAWDs subject to the time limit differ from state to state.

Few states' policies are uniformly strict or lenient across all options. Most states fall somewhere between these extremes. We examined the use of four key ABAWD policies in each state (disability certification, dependent child exemption, waiver use and 15 percent exemption

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<sup>9</sup> Two respondents said they did not want to use all the available exemptions and could not use them even if they wanted to.

<sup>10</sup> One respondent said they did not know why they did not plan to use the full allotment.

use), and we classified each policy as “strict,” “moderate,” or “lenient.”<sup>11</sup> All else being equal, a policy that is strict will result in more adults being made subject to the time limit, while a policy that is lenient will result in fewer adults being subject to the time limit. We then combined these ratings to create an ABAWD policy scale in which the lowest value (zero) represents the strictest policies, and the highest value (eight) represents the most lenient. Values for most states fall in the middle of the distribution (Figure III.8). In fact, only five states have policies that fall at the very strict end of the distribution (values of zero to two), and thirteen states have policies that fall at the very lenient end of the distribution (values of six to eight).

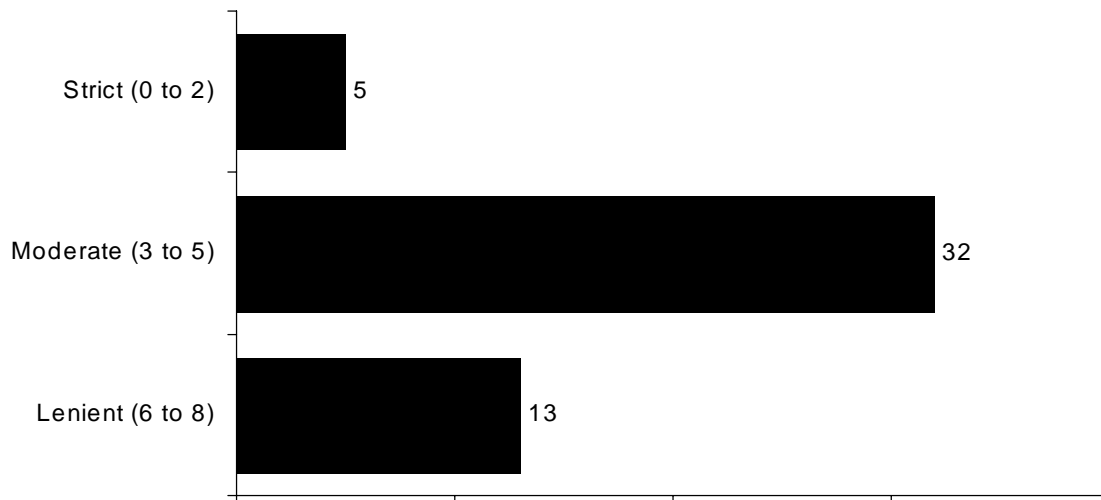
Although in most states, the four policies combine into ABAWD rules that are moderate overall, few states employ moderate policies only. Instead, most states use a combination of strict, moderate, and lenient policies. In fact, we found almost no correlation between individual state policies. For instance, states with lenient disability certification policies do not necessarily have lenient dependent child or waiver policies. Likewise, states with lenient 15 percent exemption policies do not necessarily have lenient waiver or disability certification policies.

These findings suggest that states’ agreement or disagreement with the concept of time-limited benefits for ABAWD participants may not be the main factor driving state ABAWD policies. For instance, if state policymakers disagreed with the ABAWD restrictions and wanted to exempt as many adults as possible, one could argue that they would adopt as many lenient policies as possible. Likewise, if state policymakers agreed with the ABAWD restrictions, they

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<sup>11</sup> We classify disability certification policies based on whether states allow client self-report (lenient), caseworker observation but not client self-report (moderate), or neither (strict). We classify dependent children policies based on whether all adults in a household are exempt (lenient), more than one but not all (moderate) or only one (strict). We classify waivers based on the percent of each state’s adults that are covered by waivers (states with proportionately more adults covered are considered lenient, states with no waivers are considered strict). Finally, we classify 15 percent exemptions based on the percent of each state’s allotment that was used (states that use proportionately more are considered lenient, states that do not use the 15 percent exemption are considered strict). Table C.23 in Appendix C shows the classifications for each of these policies in each state. We did not examine state policies on the age adults become exempt because there is little variation in that policy.

FIGURE III.8  
STATE ABAWD POLICY RANKINGS



SOURCE: State Food Stamp Program Director Survey

would adopt as many strict policies as possible. But this is not the case—instead, we see unique combinations of strict and lenient policies.

While policies are evidently not driven entirely by state views on time-limited benefits for the ABAWD population, the other motivating factors are not clear. Some states may base policy decisions on administrative factors, such as ease of implementation. Other states may have strong advocacy groups that influence policy choices. Still other states may have competing views at various levels of government, leading to variation in policy.

Even after the final regulations are implemented, we expect to observe continued variation in state ABAWD policies, as well as continued variation in the number and types of adults subject to the time limit. The regulations continue to allow some state flexibility in determining who meets the ABAWD definition. For instance, states maintain discretion over some aspects of their policy for certification of unfitness for employment. However, most of the future variation

will be driven by state waiver and 15 percent exemption policies. The final ABAWD regulations do not change state authority to develop and implement policies in either of these areas.

Although policy variation will continue, we expect to observe a trend towards more exemptions from the time limit. Three factors will likely drive this trend. First, while most state policies that were in effect in March 2000 are broadly consistent with the final regulations, the regulations tend to be more lenient in their specification of criteria for exempting people from the ABAWD provisions. For example, 28 states exempted only certain adults in households with dependent children, and four of these states exempted only *one* adult. Under the final regulations, *all* adults in households with any children under 18 will be exempt. Implementation of the final regulations will make ABAWD policy more lenient in at least one respect in all but three states, with 39 of these states requiring changes in two or more policy areas. At the same time, the only states required to create stricter ABAWD policies in any area are the 16 that permitted a self-report of unfitness for employment. Under the final regulations, adults must show proof of unfitness if this condition is not evident to the caseworker.

The second factor likely to drive the trend toward more exemptions is greater use of the 15 percent exemption. FSP directors in six of the states that were not using the 15 percent exemption in March 2000 indicated that they had plans to use it in the future, and about half of the states that were using the 15 percent exemption reported that they were aiming to use their full allocation. While only one state has used its full allocation in any year, the total number of exemptions used by the states has increased substantially from year to year.

Finally, if national economic conditions worsen in coming years, states will be in a position to apply for more waivers. States that already have waivers may find that more areas qualify, while states without waivers may decide to use them. Any additional waivers will exempt even more adults from the time limit.

#### **IV. HELPING ABAWDs MEET THE WORK REQUIREMENT: POLICIES AND CHALLENGES**

The intent of PRWORA is to limit how long people who are able, but unwilling, to work or participate in a work activity can receive food stamps. The law allows ABAWDs to meet the work requirement and avoid the time limit in one of two ways: working 20 hours or more per week or participating in a qualifying work activity. Nationwide, in March 2000, just over half of all ABAWDs subject to the time limit met the work requirement (Chapter II). But this nationwide average masks considerable variation across the states: less than 5 percent met the requirement in some states while more than 80 percent met it in others. While variation in state economies and characteristics of the ABAWDs undoubtedly affected this percentage, variation in state policies may also have played a role. This chapter discusses the extent to which states have implemented policies to assist ABAWDs in meeting the work requirement.

Nationwide, just less than one-quarter of all ABAWDs subject to the time limit met the work requirement by working. This chapter describes how state policies vary in the extent to which they assist ABAWDs in finding and retaining employment. In particular, it describes how they vary in the extent to which they provide support services, such as transportation assistance, the extent to which they require ABAWDs (and other FSP participants) to search for a job, and in the assistance and training they provide ABAWDs in that search. Prior to the implementation of the final regulations, states also had flexibility in what they count as “work.”

About another one-quarter of all ABAWDs subject to the time limit met the work requirement by participating in a qualifying work activity, mainly workfare or an education or training program. For the most part, states’ food stamp E&T programs funded these work activities. This chapter shows how states vary considerably in the number and types of work activities they offer ABAWDs and the extent to which the activities are available for all



ABAWDs who are subject to the work requirement. We also discuss perceptions of the effectiveness of the work activities and other services provided to ABAWDs and the challenges in providing those services.

The findings presented in this chapter draw mainly on the State E&T Managers Survey and hence refer to FY99. The discussion of the effectiveness of work activities and the challenges in engaging ABAWDs in work activities draws mainly on the Local E&T Managers Survey, which took place in Spring 2000. Some findings are also drawn from the State Food Stamp Program Directors Survey, which also refers to 2000. The survey data are supplemented by FY99 data on the use of E&T services by ABAWDs as submitted by the states to FNS on Form FNS 583.

We excluded the District of Columbia when presenting the findings because the District has always had a waiver that exempts all of its residents from the ABAWD time limit. However, we do include Arkansas and Illinois, even though these two states use the 15 percent exemption to exempt all ABAWDs who would otherwise lose benefits because of the time limit. These states were included because the availability of qualifying work activities in these states affects the number of 15 percent exemptions that they use.

We begin by discussing states' policies on meeting the work requirement through work and the support services that are available to help ABAWDs find and retain employment. Next, the extent to which states offer ABAWDs qualifying work activities is described. Then, we discuss the perceived effectiveness of work activities and other services in helping ABAWDs find employment. We then discuss the available data on participation in qualifying work activities. The challenges of providing qualifying work activities and other services to ABAWDs and some approaches to addressing these challenges are also discussed. We conclude with a summary of our findings. Appendix D presents our findings by state.

## **A. MEETING THE WORK REQUIREMENT THROUGH WORK**

The goal of the ABAWD regulations is to promote self-sufficiency through work. Hence, ABAWDs who work 20 hours or more per week can remain on food stamps indefinitely.

### **1. State Policy on What Counts as Meeting the Requirement through Work**

Before the final ABAWD regulations became effective, the states had some flexibility in what counts as meeting the work requirement through work. First, states can decide whether to allow work without pay to meet the work requirement. Second, states can decide whether ABAWDs can meet the work requirement by combining work and participation in a qualifying work activity. Table IV.1 summarizes state variation in these policies.

Most states (39) had statewide policies on both whether volunteer work counts toward meeting the work requirement and whether an ABAWD can meet the work requirement by combining work and other qualifying work activities. In the states that had not state or local policy, the decision on what counted work was either left up to the caseworkers' discretion or decided upon by the local office when the issue arose. Twenty states had a statewide policy that counted both work without pay and a combination of work and other qualifying work activities. Only three states prohibited both counting volunteer work and combining work and other qualifying work activities.

About half of all states (23) always counted unpaid or volunteer work toward meeting the work requirement. However, several respondents in the 16 states in which volunteer work was never counted said that if an ABAWD found a volunteer position, his or her caseworker would try to take the administrative steps to make it into a workfare position. Five states allowed volunteer work to count only under certain circumstances, such as if there were payment in-kind for the work, if the work were a community service position, or if the participant's caseworker had approved the position.

TABLE IV.1

## STATE POLICIES TOWARD MEETING THE WORK REQUIREMENT BY WORKING

	Total	Policy		
		Always	Sometimes	Never
<b>Volunteer Work Counts</b>				
Statewide policy	44	23	5	16
No statewide or local policy	6	n.a.	n.a.	n.a.
<b>Work Can Be Combined with Other Qualifying Work Activity</b>				
Statewide policy	45	35	3	7
No statewide or local policy	5	n.a.	n.a.	n.a.
<b>Both Policies</b>				
Statewide policy	39	20 <sup>a</sup>	16 <sup>b</sup>	3 <sup>c</sup>
No statewide or local policy	11	n.a.	n.a.	n.a.

SOURCE: State Food Stamp Program Director Survey, 2000

<sup>a</sup>States that always count volunteer work and combinations of work and participation in qualifying work activities

<sup>b</sup>States that do not count both volunteer work and combinations of work and participation in qualifying work activities, but count either volunteer work or combinations of work and participation in qualifying work activities at least sometimes.

<sup>c</sup>States that never count volunteer work or combinations of work and participation in qualifying work activities

n.a.: Not applicable

Just over two-thirds of all states (35) had a statewide policy that explicitly allowed a combination of work and participation in work activities to satisfy the work requirement under all circumstances. Another three states allowed a combination to count under certain circumstances, such as if there were “not enough” jobs or qualifying work activities for the ABAWD to satisfy the work requirement solely by one activity or if the combined number of hours in work and work activities totaled 30 or more.

The final ABAWD regulations remove some of the states’ flexibility in determining what counts as meeting the work requirement. They require that volunteer work be considered as satisfying the work requirement in accordance with “standards established by the State agency” and that combined hours in work and participation in a qualifying work activity count as

satisfying the work requirement.<sup>1</sup> For the 30 states that did not already have statewide policies in place allowing both volunteer work and combinations of work and participation in work activity to count, the regulations are likely to increase the number of ABAWDs who satisfy the work requirement.

## **2. Job Search and Job Search Training**

Even before PRWORA, the Food Stamp Act gave states the option to require food stamp participants who are subject to food stamp work registration (including all participants who subsequently became subject to the ABAWD time limit) to participate in job search or job search training for up to 120 hours a month, less any hours of workfare participation and/or any work hours. Hence, in some states, ABAWDs are required to conduct job search or job search training or be subject to a sanction. This requirement is in addition to the ABAWD work requirement.

PRWORA explicitly excluded job search and job search training from the list of qualifying work activities unless the job search or job search training was part of a JTPA (now WIA) or Trade Adjustment Assistance (TAA) program. FNS later advised states that job search and job search training in the first 30 days of a workfare program also counted as a qualifying work activity. The final ABAWD regulations also allow job search and job search training to count as a qualifying work activity as long as it was a “subsidiary” part of a qualifying program and the job search activity was “less than half of the requirement.” Other than these exceptions, conducting a job search or participating in job search training does not count toward the ABAWD work requirement.

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<sup>1</sup> The regulations also state that work paid in-kind (such as in exchange for food or free rent) should be considered paid work.

**a. Job Search**

In FY99, more than two-thirds of states (34) required at least some participants who register for work, and hence some ABAWDs, to conduct a job search (Table IV.2). Of these, 27 states had either a statewide policy or had local policies in effect on how ABAWDs could satisfy the job search requirements. The requirements varied by state but were usually defined in terms of a minimum number of hours spent searching and/or a minimum number of contacts in a specified time period. Requirements ranged from 8 hours per day to 12 hours per month and 15 contacts per week to 10 contacts per month. Eight states had other requirements, such as requiring job counseling or participation in a job club, in addition to an hour or contact requirement.

All but three states that required a job search provided participants some services (other than job search training) to help with this search.<sup>2</sup> Typically, states provided access to telephones to contact employers, access to word processors or typewriters, and lists of names of employers.

**b. Job Search Training**

Most states (30) that required a job search also offered job search training to at least some ABAWDs (Table IV.2). In addition, five states that did not require a job search offered job search training to some ABAWDs.

All but one of the states that offered job search training offered training in resume writing, interviewing skills, and “soft skills,” such as how to dress for work or communicate with bosses and coworkers. In addition, most states provided training in time-management and/or money management skills. Many of the states (18) offering job search training reported that they also

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<sup>2</sup> In two additional states, California and Maryland, the respondent did not know what services were provided in the local offices.

TABLE IV.2

## STATES THAT REQUIRED JOB SEARCH AND/OR OFFERED JOB SEARCH TRAINING TO AT LEAST SOME ABAWDs IN NONWAIVED AREAS

	Availability of Job Search Training	
	Offered	Not Offered
Require Job Search	30	4
Do Not Require Job Search	5	11

SOURCE: State E&T Managers Survey, FY99

provided assessment/aptitude testing or training in other topics such as job retention, anger control, or personal hygiene.

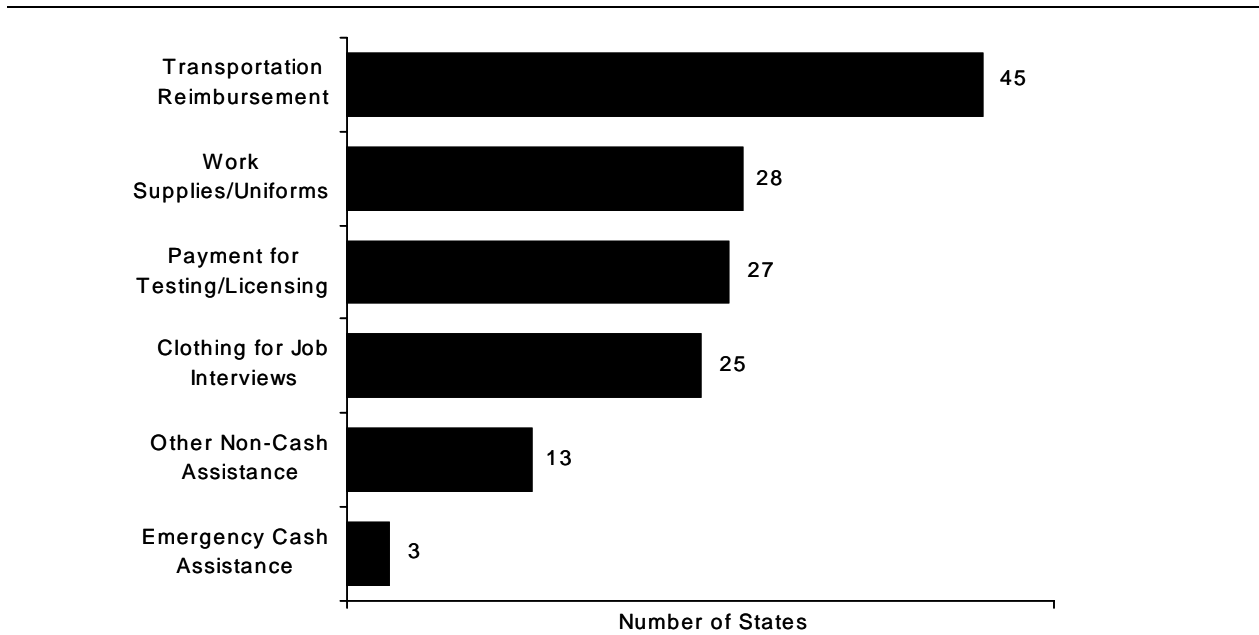
### 3. Work-Related Support Services

To what extent do the states provide support services, such as assistance with transportation or other job-related expenses to ABAWDs who are working? The majority of states (45) provided some support services in FY99. Of these, 32 states provided one or more services in all nonwaived areas of the state; 13 states provided it in some but not all nonwaived areas.

States varied in the types of support services they provided to ABAWDs. Figure IV.1 presents the number of states that provided each type of service. All states that offered support services provided reimbursements for transportation expenses. The Food Stamp Act provides federal funding to match dollar-for-dollar state spending on transportation and other work-related expenses (other than dependent care) up to a cap of \$12.50 per person per month. Seventeen states paid ABAWDs more than \$25 per person per month for these expenses and thus paid more than 50 percent of the cost. In addition to providing work supplies and uniforms, paying for testing and licensing, and providing or paying for clothing for interviews, some states paid for some other noncash assistance such as medical services, eyeglasses, books and manuals,

FIGURE IV.1

TYPES OF WORK-RELATED SUPPORT SERVICES OFFERED TO ABAWD PARTICIPANTS



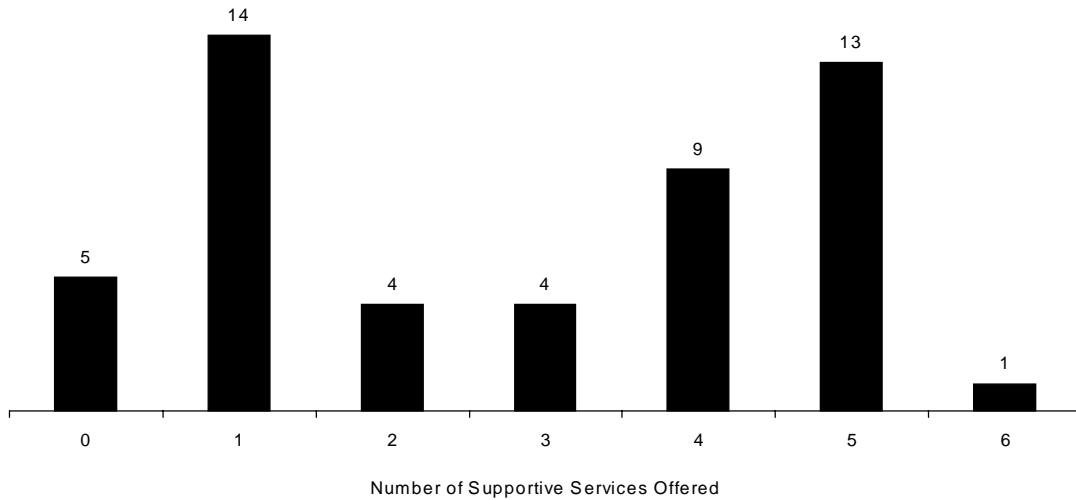
SOURCE: State E&T Managers Survey, FY99

drivers' education, car repairs, and payment of fees to renew drivers' licenses. Three states also made available one-time emergency cash assistance for ABAWDs.

On average, the states offered just less than three types of support services (the different types are listed in Figure IV.1). However, this average masks considerable variation across states in the number of services offered (Figure IV.2). Five states offered no support services to ABAWDs. Fourteen states provided only reimbursement for transportation and other expenses, and 12 of these states only spent up to the cap eligible for federal matching funds, providing participants at most \$25 per person per month. In contrast, 23 states provided four or more different types of services.

FIGURE IV.2

DISTRIBUTION OF STATES BY NUMBER OF DIFFERENT TYPES OF SUPPORT SERVICES OFFERED TO ABAWD PARTICIPANTS



SOURCE: State E&T Managers Survey, FY99

**B. AVAILABILITY OF QUALIFYING WORK ACTIVITIES**

An unemployed ABAWD can meet the work requirement by participating in workfare or by participating in another qualifying work activity for 20 hours or more per week. Qualifying work activities fall into five categories: (1) workfare or other work programs, (2) education programs, (3) vocational training, (4) self-employment programs, and (5) under certain circumstances, job search and job search training. As described earlier, job search and job search training only qualify if they are provided as part of a WIA (formerly JTPA) or TAA program, or are a subsidiary part of a qualifying work activity.

Most, but not all, of the qualifying work activities available to ABAWDs are funded by the food stamp E&T program. Other states use 50 percent federal matching funds rather than the 100 percent E&T funds to fund some qualifying work activities. Some qualifying work activities are funded with WIA (formerly JTPA) funds.



## **1. Number of States Offering Qualifying Work Activities**

Nearly all states (47) provided at least one of the five types of qualifying work activity for some ABAWDs in some areas of the state in FY99 (Table IV.3).<sup>3</sup> Three states—Iowa, Oklahoma, and Rhode Island—provided no qualifying work activities at all. Hence ABAWDs in these states could only satisfy the work requirement by working or self-financing their participation in education or vocational training.<sup>4</sup>

States varied, however, in the number of qualifying work activities they offered (Figure IV.3). Of those states that offered some form of qualifying work activity, seven states provided only one of the five types of activity. The median number of different services offered was three; the mean number of services offered was just less than three.

## **2. Types of Qualifying Work Activities Offered**

The types of qualifying work activities offered also varied by state. However, 26 states offered at least the following three activities--workfare, education, and vocational training.

### **a. Workfare and Other Work Programs**

Work programs were by far the most frequently offered qualifying work activity. Forty states offered workfare or another type of work program (Table IV.3). This finding is confirmed by data submitted by the states to FNS on the FNS 583 that show 86 percent of all “slots” or places in E&T filled by ABAWDs in FY99 were workfare slots. It is also consistent with our

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<sup>3</sup> Data on the provision of job search and job search training through JTPA/TAA were collected for March 2000, while the data on the provision of other qualifying work activities refers to FY99.

<sup>4</sup> Iowa provided some job search training for ABAWDs; Oklahoma and Rhode Island (much of which is covered by waivers) provided no E&T services at all. By 2000, when the Local E&T Managers Survey was conducted, Rhode Island provided some limited E&T services.

TABLE IV.3

## NUMBER OF STATES OFFERING QUALIFYING WORK ACTIVITIES TO ABAWDs

Activity	Activity Offered In:		
	Some Areas of the State	Some Nonwaived Areas of the State	All Nonwaived Areas of the State
At Least One Qualifying Activity	47	46	32
Workfare or Other Work Program	40	39	26
Education Program	34	32 <sup>a</sup>	22 <sup>a</sup>
Vocational Training	34	32 <sup>a</sup>	24 <sup>a</sup>
Self-Employment Program	5	5	1
Job Search/Job Search Training as Part of JTPA/TAA <sup>b</sup>	26	- <sup>c</sup>	- <sup>c</sup>

SOURCE: State E&T Managers Survey FY99 and State Food Stamp Program Director Survey 2000

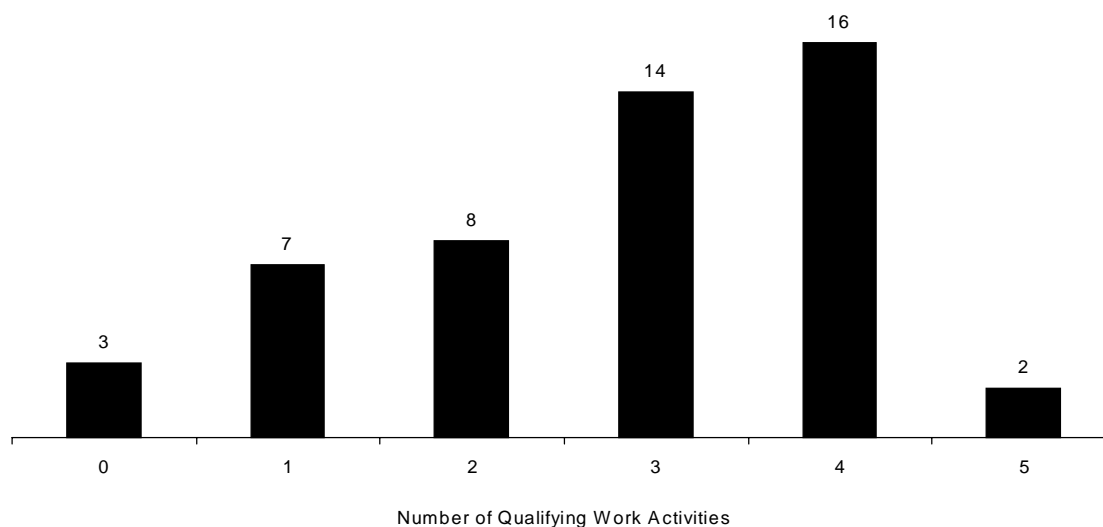
<sup>a</sup>One respondent did not know in which areas the activity was offered.

<sup>b</sup>These data were obtained from the State Food Stamp Program Director Survey and so refer to 2000.

<sup>c</sup>The survey did not ask in which areas the JTPA or TAA programs were offered.

FIGURE IV.3

## DISTRIBUTION OF STATES BY NUMBER OF QUALIFYING WORK ACTIVITIES OFFERED ANYWHERE IN STATE



SOURCE: State E&T Managers Survey, FY99

finding in Chapter II that of those ABAWDs meeting the work requirement, 45 percent met it through workfare while only 9 percent met it through other qualifying work activities.

Section 20 of the Food Stamp Act defines workfare as an activity in which food stamp participants perform work in a public service capacity in exchange for the food stamp benefits to which their household is entitled. Workfare provides positions for ABAWDs in public or private not-for-profit organizations only. The hours of participation in workfare are limited to the number of hours needed to “pay off” the household’s monthly benefit allotment at the higher of the applicable federal or state minimum wage.

Most states (93 percent) that offer qualifying work programs to ABAWDs offer Section 20 workfare programs (Table IV.4). However, four states operated an “optional” workfare program—a workfare program that need not meet all the requirements of the Section 20 workfare programs and is funded with only 50 percent federal matching funds rather than 100 percent federal E&T funds. Twelve more states operated other types of work programs that also provided work experience but with different requirements and funding than the workfare program.

While most workfare slots are arranged by the Food Stamp E&T agency, some states allow ABAWDs to find their own “self-initiated” workfare positions. Of the 37 states that offered Section 20 workfare, 18 states provided prearranged workfare positions and also allowed ABAWDs to find their own positions, 17 states provided prearranged workfare positions but did not allow ABAWDs to obtain their own positions, and two states allowed ABAWDs to find their own self-initiated positions but did not provide any prearranged positions.

The workfare programs may require participants to conduct job search or job search training in the first 30 days of the workfare program before they begin work at a site. This job search or job search training is counted as a qualifying activity as long as it is less than half of the

TABLE IV.4

## NUMBER OF STATES OFFERING DIFFERENT TYPES OF WORK PROGRAMS

Type of Work Program	Number of States
Section 20 Workfare Program Only	24
Optional Workfare Program Only	1
Another Type of Work Program Only	2
Section 20 Workfare Program and Optional Workfare Program	3
Section 20 Workfare Program and Another Type of Work Program	10
Any Workfare or Work Program	40

SOURCE: State E&T Managers Survey, FY99

program. In the State Food Stamp Program Director Survey, nearly 70 percent of the respondents whose states provided workfare in 2000 required job search or offered job search training as part of their workfare program.<sup>5</sup>

Most states that offered workfare and/or other work programs did not place a limit on the length of time spent in workfare. However, one state limited participation in workfare to 33 out of 36 months and five states limited participation in workfare to two to six months.

#### **b. Education and Vocational Training Programs**

After workfare, education and vocational training were the most frequently offered qualifying work activities. Thirty-four states offered education and the same number offered vocational training (Table IV.3).

The three most common types of education programs offered to ABAWDs were: classes aimed at providing a high school or GED diploma (offered by 33 states); classes to teach basic mathematics and literacy skills (offered by 31 states); and English as a Second Language classes

<sup>5</sup> In March 2000, 43 states offered workfare or other work programs and 30 included job search or job search training.

(offered by 29 states).<sup>6</sup> Of the 34 states that provided any education programs for ABAWDs, at least 26 states offered all three of these types of classes. Six states offered some type of secondary or post-secondary education and two states offered driver's education.

Typically, states that provided vocational training to ABAWDs offered some classroom training (31 states) and some on-the-job training (19 states).<sup>7</sup> Of the 34 states that provided vocational training to ABAWDs, at least 19 states offered both classroom training and on-the-job training.

Fifteen states placed some limit on the amount of time an ABAWD could spend in either an education and/or a vocational program. Only eight states, however, placed limits on the number of months an ABAWD could participate in these programs. The limits varied from 3 to 24 months.

### **c. Self-Employment Programs**

Self-employment programs were the least frequently offered types of activity—only five states offered them. Although the content of these programs varied by state, they typically involved assistance in developing business plans, training in financing and business opportunities, and referrals to community organizations.

## **3. Availability of Activities In Nonwaived Areas of the State**

Some of the states that offered qualifying work activities did not offer them in all food stamp offices. While 47 states offered at least one qualifying work activity somewhere in the state, only 32 states offered at least one qualifying work activity other than JTPA or TAA job search or job search training in all nonwaived areas of the state (Table IV.3). Among these

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<sup>6</sup> Two respondents did not know what types of education programs were offered.

<sup>7</sup> Three respondents did not know what types of vocational programs were offered.

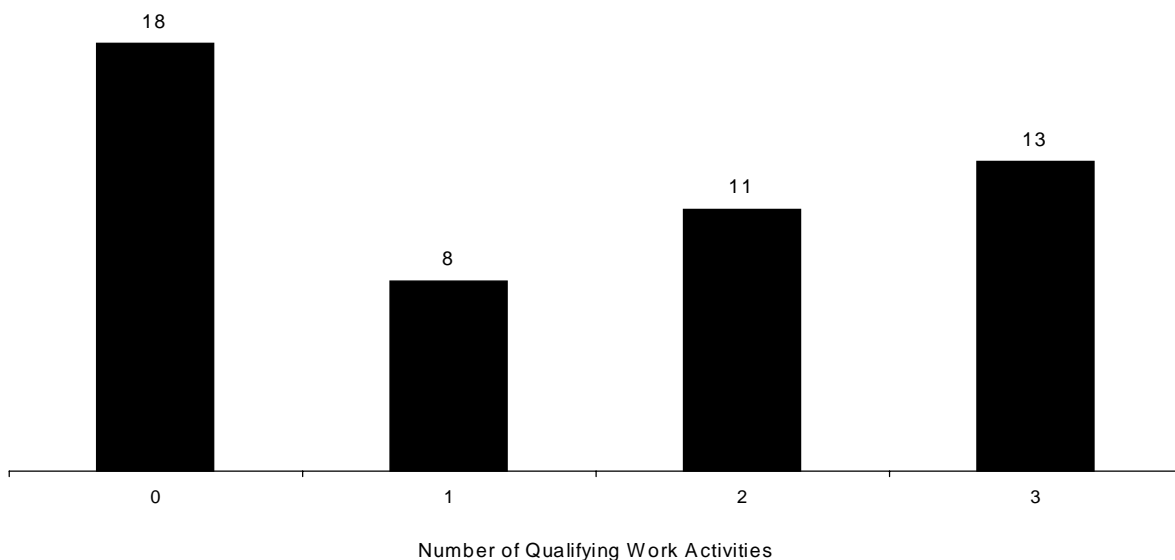
states, there were on average two qualifying work activities available in all nonwaived areas (Figure IV.4).

#### 4. Availability of Qualifying Work Activities for ABAWDs Who Wish to Participate in Them

While more than half the states offered at least one qualifying work activity in all nonwaived areas, there may not have been sufficient capacity in the available programs to offer a place or slot for all ABAWDs who wanted to participate. To explore the relative availability of slots, for each type of qualifying work activity, we asked state E&T managers whether a slot was available for any ABAWD subject to the time limit who wished to participate in that activity.

FIGURE IV.4

DISTRIBUTION OF STATES BY NUMBER OF QUALIFYING WORK ACTIVITIES OFFERED TO ABAWDS IN ALL NONWAIVED AREAS OF STATE



SOURCE: State E&T Managers Survey, FY99

Workfare was the activity that states were most likely to be able to offer to all ABAWDs who wanted to participate—22 states had a prearranged workfare slot for every ABAWD participant in nonwaived areas who wanted one (Table IV.5). About one-third of all states reported having a slot in an education or vocational training program for all ABAWDs who wanted one.

A little over half of the states (28) reported having at least one qualifying work activity available for any ABAWD participant in nonwaived areas who wanted to participate in that activity (Figure IV.5). Relatively few states, however, could offer more than one type of work activity to all ABAWDs. Only 18 states had two or more work activities available for every ABAWD who wanted to participate.

**5. Work Activities Offered to ABAWDs Who Have Reached the Time Limit and Become Ineligible**

Many states (38) also offered activities to allow ABAWDs to regain FSP eligibility after they had reached the time limit. A majority (30) of these states offered the qualifying activities in all nonwaived areas. Of the 12 states that did not offer activities to nonparticipants, two states used the 15 percent exemption so that no ABAWD lost eligibility because of the time limit, three states provided no qualifying work activities to any ABAWDs, and the remaining seven states offered qualifying work activities only to ABAWDs who were still participating in the FSP.

TABLE IV.5

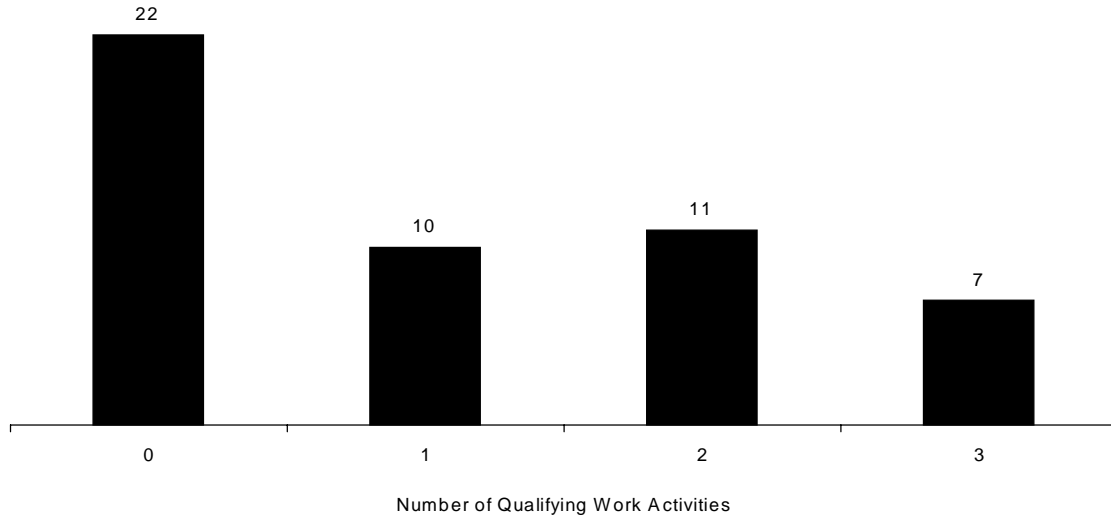
NUMBER OF STATES OFFERING A SLOT IN A QUALIFYING WORK ACTIVITY TO ALL ABAWD PARTICIPANTS IN NONWAIVED AREAS WHO WANTED ONE

Prearranged Slot in Workfare or Other Work Program	22
Education Program	16
Vocational Training	17

SOURCE: State E&T Managers Survey, FY99

FIGURE IV.5

DISTRIBUTION OF STATES BY NUMBER OF QUALIFYING WORK ACTIVITIES AVAILABLE TO ALL ABAWDs WHO WANTED TO PARTICIPATE



SOURCE: State E&T Managers Survey, FY99

How much ABAWDs who have lost eligibility use these activities depends in part on the extent to which the ABAWDs know they are available. However, of the local offices surveyed in the Local E&T Managers Survey, only 29 percent undertook outreach efforts to advise ABAWDs who had lost their eligibility that they could regain eligibility by participating in a qualifying work activity.

## 6. Use of Federal Food Stamp E&T Funds

Even though many states did not provide qualifying work activities to all ABAWDs who wanted to participate in a work activity, the states were far from using all available federal funds. The BBA required that at least 80 percent of the federal E&T grant be earmarked for qualifying work activities for ABAWDs. The remaining 20 percent of the allocated funds may be spent on activities that are not qualifying, such as job search, or on FSP participants who are not



ABAWDs. Overall, states spent only 44 percent of total available federal E&T funds in FY99 and 32 percent of the funds earmarked for qualifying activities for ABAWDs.

Fifteen states spent 20 percent or less of the available funds, and seven of those did not spend any of the federal E&T funds on ABAWDs (Figure IV.6). Only two states spent all of the funds earmarked for ABAWDs only.

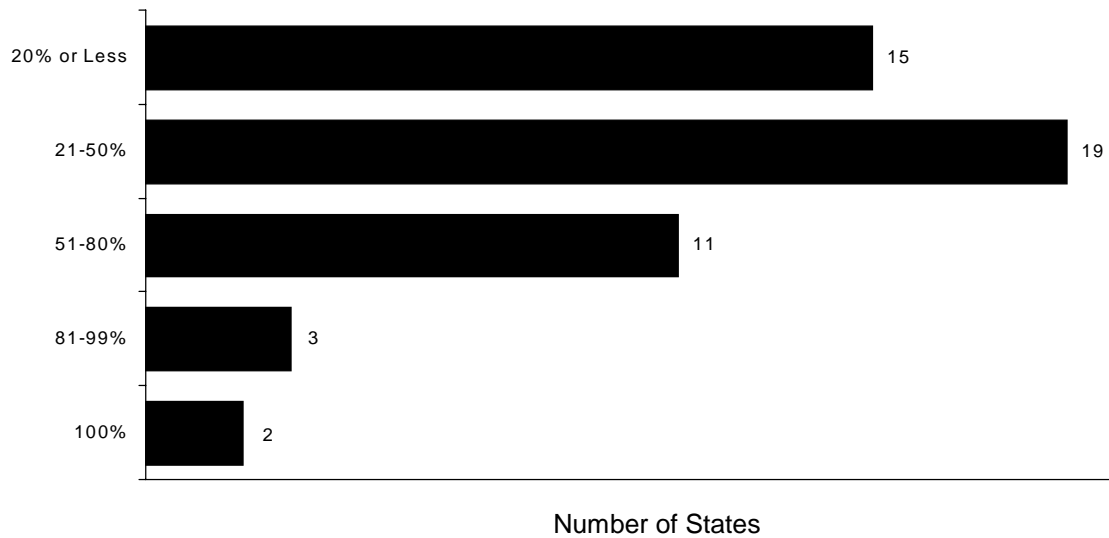
Why are the states not using all the available E&T funds for ABAWDs? In the State E&T Managers Survey, we asked whether the states planned to use all their FY99 allocation, and if not, why not. Of the 48 states that did not spend their full allocation, 25 states planned to use less than the full allocation, 17 states planned to use all the allocation, and 6 states said they did not yet know the percentage they planned to spend.

Respondents from the 25 states that did not plan to use all their allocation gave three related reasons. First, 18 respondents said that there were too few ABAWDs willing to participate in the qualifying work activities. Some of these states were concerned that it would not be economical to develop new types of activities or activities in new areas of the state. The number of ABAWDs subject to the time limit was relatively small and still falling in FY99 and, as we will discuss in the next section, ABAWDs have a low rate of participation in the activities that are offered. Since funding is provided on a per slot basis with reimbursement caps, the states were concerned that they would not recover the fixed costs of providing new work activities.

In FY99, FNS approved eight states as “alternative reimbursement” states. These states were not subject to the reimbursement caps, but in return were required to offer a qualifying work activity slot to all ABAWDs in nonwaived areas. Most of these states used a higher than average proportion of their allocation of federal funds. While less than one-third of all states

FIGURE IV.6

DISTRIBUTION OF STATES BY PERCENTAGE OF E&T FUNDS DRAWN IN FY99



SOURCE: Botsko et al. 2000

used more than half of their allocation of federal funds, six out of the eight alternative reimbursement states spent more than half. All of the states, except South Dakota, exceeded the per slot reimbursement rate, often by large amounts (Botsko et al. 2000).

Second, 11 respondents cited issues related to the requirements for using the federal funds. One specific concern expressed was the difficulty meeting the maintenance of effort requirement--the requirement that the state does not spend less on E&T from nonfederal sources that it did in FY96. Other concerns included uncertainty over the budget or the policy and the general complexity of the requirements.

Third, respondents in four states said that they thought providing more work activities for ABAWDs was ineffective. One respondent said that work activities were ineffective unless they could provide transportation and other support services that were not reimbursable from these

funds. Another respondent said that services were available for ABAWDs from other sources, such as JTPA.

Although the State E&T Managers Survey did not ask why the 17 states that had planned to spend all their federal funds did not do so, several managers said that the number of ABAWDs or the number of ABAWDs who wished to participate in the work activity was lower than they had expected.

### **C. PERCEIVED EFFECTIVENESS OF EMPLOYMENT AND TRAINING SERVICES FOR ABAWDs**

Does participation in qualifying work activities help ABAWDs find employment? Are other E&T services that are not qualifying work activities, such as job search training and support services, also helpful? For each service offered, we asked the respondents to the Local E&T Managers Survey whether they thought the service was helpful for some ABAWDs. The respondents who viewed a service as helpful for some ABAWDs were asked to tell us for which type of ABAWD it was helpful and why.

A large majority of respondents reported that each service had helped at least some ABAWDs secure or retain employment (Table IV.6). Participation in education programs, job search training, and support services were most widely viewed as helpful. Workfare and vocational training were also viewed as helpful, but by a somewhat smaller proportion of respondents.

Different activities are viewed as helpful for different types of ABAWDs. Workfare and other work programs are helpful for ABAWDs who lacked the “soft skills” necessary for work, such as how to dress for work, get into a work routine, attend to personal hygiene, as well as to communicate and behave appropriately with coworkers and bosses. Managers also reported that workfare is helpful for ABAWDs with little or no labor market experience, because it allows

TABLE IV.6

## PERCENTAGE OF RESPONDENTS WHO VIEWED E&amp;T SERVICE AS HELPFUL FOR SOME ABAWDs

	Number of Respondents Whose Office Offers Service	Percentage of Respondents Who Viewed Service as Helpful	Type of ABAWDs Who Managers Viewed Most Likely to Benefit from Service
Workfare	73	89%	Those Without Soft Skills or Work Experience
Education	70	96%	Those Who Lack Credentials
Vocational Training	61	92%	Those Who Lack Marketable Skills
Job Search Training	76	99%	Those Who are Job Ready
Support Services	92	95%	Those With Transportation Barriers

SOURCE: Local E&T Managers Survey, 2000

ABAWDs to gain work experience and earn good references from local employers. On the other hand, some respondents argued that for ABAWDs who are job ready, workfare can be distracting, reducing the time the ABAWDs have to look for regular employment.

Many E&T managers reported that education programs are especially helpful for ABAWDs who lack credentials. By helping ABAWDs earn a high school diploma or GED, these programs can considerably increase their likelihood of securing employment.

Many managers viewed vocational training as most helpful for ABAWDs who lack specific marketable skills. These may be ABAWDs who have work experience and a high school credential, but need training for a specific occupation. These may also be older persons whose current skills are obsolete or who can no longer do the work they used to and need to learn new skills.

Job search training was viewed as most helpful for those ABAWDs who are job ready but lack work experience. It is seen as particularly helpful for ABAWDs with a high school credential or who had basic mathematics and literacy skills, but did not have a long employment history.

Most respondents viewed support services as helpful for people with transportation barriers. Most respondents said transportation assistance is especially helpful for ABAWDs in rural areas. Other desirable support services include the provision of clothing, energy assistance, eyeglasses, uniforms, and tools.

#### **D. PARTICIPATION IN WORK ACTIVITIES BY ABAWDs**

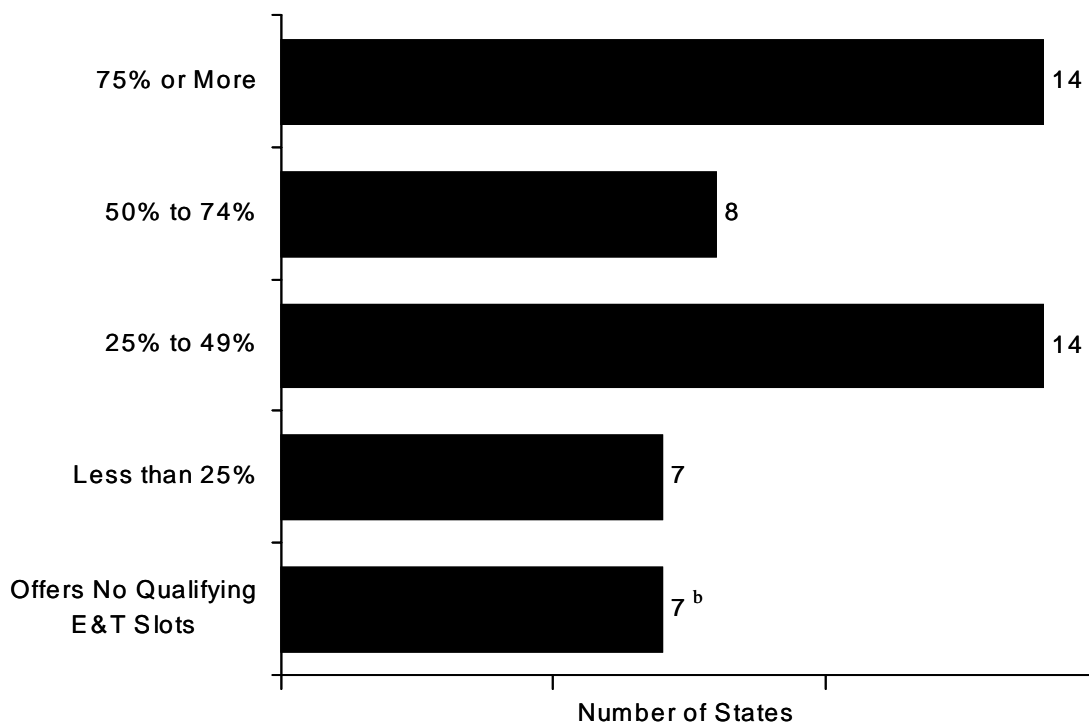
Both state and local E&T managers reported that many ABAWDs are unwilling to participate in work activities. Some local managers reported that many ABAWDs are referred to E&T services but do not show up to participate, instead choosing to use up their time-limited benefits and leave the FSP. While we would like to accurately quantify the rate at which ABAWDs choose to participate in qualifying work activities, the data necessary to do so are not available. However, information collected by FNS to reimburse the states for their E&T services is broadly consistent with the reports that many ABAWDs choose not to participate.

States are reimbursed for slots in qualifying work activities that they fill each month. They are also reimbursed for “offered” slots--slots that are offered but not filled because they are refused or because the client does not show up to participate in the activities. A single slot can be offered to more than one ABAWD and is counted as an “offered” slot each time it is offered but not filled. However, a slot can be counted as filled only once in a month. Both the monthly number of filled slots and the monthly number of offered slots are reported on Form FNS 583.

Nationally in FY99, the number of filled slots in any qualifying activity was 72 percent of the sum of filled and offered slots in nonwaived areas. The number of filled slots in workfare as a proportion of the sum of filled and offered slots was similar (73 percent). The percentage of slots filled in education and vocational training was slightly lower (67 percent). However, there is great variation across states in these numbers (Figure IV.7). While in 14 states, more than 75 percent of filled and offered slots in any qualifying activity were filled, in seven states less than

FIGURE IV.7

PERCENTAGE OF FILLED AND OFFERED SLOTS IN QUALIFYING WORK ACTIVITIES THAT WERE FILLED BY ABAWD PARTICIPANTS, NONWAIVED AREAS, FY99<sup>a</sup>



SOURCE: FNS 583

<sup>a</sup> Includes only qualifying work activities funded by federal E&T funds.

<sup>b</sup> One survey respondent reported that their state provided no qualifying E&T slots in FY99 but FNS 583 showed that they provided some slots. This figure reflects the FNS 583 data rather than the survey response.

25 percent of filled and offered slots were filled. The two largest states--California and New York—have particularly high proportions of filled slots and substantially increase the national average. The number of filled slots as a percentage of offered and filled slots falls to about 40 percent if these two states are excluded.

It is important to note that these figures should not be interpreted as the percentage of the total available slots in work activities that are filled. Because single slots can be counted multiple times as “offered” slots by being offered to more than one ABAWD, the sum of filled plus offered slots could be greater than the number of existing slots in work activities. Similarly,

as some slots may not be offered at all in a month, the sum of filled plus offered slots could be less than the number of existing slots.

These figures do, however, provide an upper-bound to the proportion of ABAWDs who accept a slot when offered one—the proportion of ABAWDs who accept an offered slot in a month must be no greater than 72 percent and is probably considerably lower. By including the slots offered and accepted by ABAWDs in earlier months, the number of filled slots always exceeds the number of slots newly offered in the month. Hence, the proportion of filled and offered slots that are filled will be greater than the proportion of ABAWDs who are offered a slot that accept it. As an illustration of the extent to which the figures could overstate the rate at which offered slots are accepted: if half of qualifying work activity slots filled in a month were offered for the first time in that month, the finding that 72 percent of filled plus offered slots were filled implies that only about 56 percent of the ABAWDs that were offered slots in that month accepted the offer. In addition, the rate at which offers are accepted may overstate ABAWDs' willingness to participate because in some states ABAWDs may not even be offered a slot if they do not show up at their E&T interview.

## **E. CHALLENGES OF PROVIDING E&T SERVICES TO ABAWDs**

The majority of the respondents to our surveys at both the state and local level (88 percent of state E&T managers and 60 percent of the surveyed local office E&T managers) reported that there are significant challenges in providing E&T services to ABAWDs. The challenges described below are based on the responses of both state and local E&T managers when asked to describe the specific challenges they faced in providing E&T services to ABAWDs.

### **1. Low Rate of Participation in Work Activities**

Between 40 and 48 percent of state and local E&T managers cited low participation as a challenge in serving ABAWDs. We asked local E&T managers what, if any, factors discouraged

ABAWDs from participating in both qualifying work activities and job search training. More than half of the local E&T managers reported factors that discouraged ABAWDs from participating in each of these activities (Table IV.7). Three broad sets of reasons were given: (1) lack of motivation, (2) personal barriers to participation, and (3) lack of support services.

**a. Lack of Motivation**

Local E&T managers observed that some ABAWDs just do not want to put any effort into participating in available activities and mentioned that ABAWDs often do not show up for appointments. This was particularly the case for workfare. Twenty-five local-office managers said that the lack of regular pay was a factor in discouraging participation in workfare. Many said that ABAWDs considered the “lack of pay” in workfare as a “punishment.”

**b. Personal Barriers**

Managers also stated, however, that there are some ABAWDs with personal barriers that prevent them from participating. Lack of confidence and self-esteem were frequently mentioned as reasons that some ABAWDs do not participate in E&T activities, especially education and training. Managers whose offices offered education and vocational training programs to ABAWDs said they believed that some ABAWDs’ lack of basic skills (reading, writing, and basic mathematics) discouraged them from participating in these programs. In addition, many ABAWDs have other personal barriers, described in the next section, that make them hard-to-serve and less likely to participate.

**c. Lack of Support Services**

A lack of support services was cited as a factor discouraging participation in each type of E&T activity. The most frequently mentioned was the lack of transportation. This was especially an issue in rural areas and for the homeless. Several managers noted the need for a range of



TABLE IV.7

## FACTORS THAT DISCOURAGE ABAWD PARTICIPANTS FROM PARTICIPATING IN E&amp;T ACTIVITIES

Factor	Type of E&T Activity			
	Workfare	Education	Vocational Training	Job Search Training
	Number of Local E&T Managers Who Cited Factor as one that Discouraged E&T Participation by ABAWDs			
Lack of Motivation	25	5	9	4
Personal Barriers				
Lack of Confidence/Self-Esteem	2	11	9	5
Lack of Basic Skills	0	4	2	0
Other Personal Barriers	6	7	8	9
Lack of Support Services				
Lack of Transportation	10	14	9	14
Lack of Funding for Tests	0	0	2	0
Lack of Other Support Services	3	14	6	6
Number of Respondents Who Responded that there were Factors that Discouraged ABAWDs from Participating	45	48	40	39 <sup>a</sup>
Number of Respondents in Offices that Provided Service	73	70	61	76

SOURCE: Local E&amp;T Managers Survey, 2000

<sup>a</sup> One respondent did not know what factors discouraged participation.

support services including appropriate clothing, help with housing issues, and payment of fees to take tests, such as the GED test.

## 2. Hard-to-Serve Population

The ABAWD participants' personal barriers do not only discourage ABAWDs from participating in E&T activities, but also make it difficult to find appropriate work activities for them. Thirty-nine percent of local managers reported that ABAWDs' personal barriers made it difficult to serve them. The most frequently mentioned three barriers were: medical or mental health issues, substance abuse, and homelessness. Some ABAWDs, who have medical problems that prevent them from participating in E&T activities, are not exempted because their problem is undiagnosed or because medical information to document the problem is not yet available.

ABAWDs who are homeless or transient pose unique challenges in that they are especially difficult to contact. An inability to speak English serves as a barrier to participants in workfare and most education and training programs. Several respondents noted that it is difficult to find a workfare position for those with criminal records, especially sex offenders.

### **3. Lack of Funds for Support Services**

In addition to discouraging ABAWDs from participating, the lack of funds for support services was viewed as a problem in finding appropriate services for those ABAWDs who wanted to participate. As noted earlier, the lack of transportation was viewed as the most prevalent challenge. After transportation, the lack of appropriate clothing for job interviews and employment was most frequently cited as a challenge. Managers frequently complained that the cap of \$12.50 per person per month of federal matching funds is too low to adequately assist clients with transportation and other services. Several local managers also complained of the lack of funding for computers that could be used by ABAWDs when writing resumes and letters to employers.

### **4. The Structure of E&T Funding for ABAWDs**

Respondents in both state and local offices complained about the fixed per slot reimbursement cap and the restriction that 80 percent of E&T funds be spent on qualifying work activities for ABAWDs. Some of the concern was that there were less funds available to spend on non-ABAWDs. Despite the overall increase in E&T funds, the 20 percent of funds the states could now spend on non-ABAWDs was less than the funds available for non-ABAWDs prior to the BBA. Respondents also complained, however, that the 80 percent requirement together with the fixed per-slot reimbursement cap made it difficult to serve ABAWDs, too. By serving only ABAWDs, the fixed costs involved in developing and running an E&T program may not be recovered. If the 80 percent requirement were removed, the states could provide the services to a

larger population, making it more likely that the reimbursement cap would cover the average cost of the program. At the local level, managers complained of the difficulties of finding providers who would agree to be paid per filled and offered slot rather than for the actual costs of the program. The increase in the number of states that chose the “alternative reimbursement” and so are not subject to the reimbursement cap, from eight in FY99 to 13 currently, may be a reflection of this concern.

## **5. Complexity of the Policy**

Another issue that was noted by both state and local E&T managers was the challenge of dealing with a changing and administratively complex policy. At the state level, some respondents complained about the general complexity of the funding requirements. Local managers reported that caseworkers had difficulties with the changes that accompanied the ABAWD provisions, which, in many cases, significantly changed the nature of their job from determining eligibility to actively encouraging ABAWDs to work or participate in qualifying work activities.

## **6. Restrictions on the Types of Qualifying Activities**

Some state and local E&T managers felt that the restrictions on what constitutes a qualifying work activity requires caseworkers to focus on maintaining food stamp eligibility rather than encouraging employment. In particular, states objected to the restrictions on counting job search and job search training as a qualifying activity because they found it to be an effective component.

## **7. Lack of Qualified Staff**

Several local managers also raised the issue of limited staffing. It is a challenge at a time of a booming economy to hire enough trained staff to provide additional services to ABAWDs.

## F. APPROACHES TO ADDRESSING THE CHALLENGES

We also asked local E&T managers how they have addressed these challenges. Although many view the challenges as largely intractable, some states and local offices had developed approaches to addressing the challenges. The approaches used by local E&T offices to increase participation in qualifying work activities included:

- ***More Intensive Case Management.*** Managers reported that they increased the amount of time caseworkers spent with ABAWDs. For example, some group orientation sessions were replaced with one-on-one interviews with caseworkers. This increased time allowed caseworkers to provide clients with more information about available services and to help motivate the clients to participate.
- ***More Rapid Placement into a Qualifying Activity.*** Several E&T managers noted the importance of moving ABAWDs into work activities and job search as quickly as possible. To avoid losing contact with the ABAWD after eligibility is determined, some offices ask food stamp applicants to participate in an E&T interview or assessment before their food stamp eligibility is determined.
- ***Improved Coordination between Eligibility and E&T Workers.*** Managers reported that they had improved coordination between food stamp eligibility workers and E&T workers. For example, in one office, eligibility workers work directly with the E&T team in the DOL office to refer ABAWDs to the E&T service.
- ***Additional Incentives to Participate.*** One E&T provider provides a store gift certificate to ABAWDs who complete 30 days of E&T activities.

Some states and local offices have addressed the problem of the hard-to-serve by using the 15 percent exemption to exempt those ABAWDs with severe barriers. Other states allowed eligibility workers to certify a medical problem based on their own observation, as all states will need to do when the final regulations are effective. This allows eligibility workers to exempt from the time limit persons with obvious, but undocumented, medical problems. In addition, local offices have made efforts to refer ABAWDs for other services, such as substance abuse treatment programs.

Seventeen states also have found additional funds for support services so they can provide more than \$25 per person per month. Others have encouraged ABAWDs to share rides to reduce

the cost of transportation and/or have begun clothing banks so ABAWDs can have access to appropriate clothing for work. Local offices have drawn on community organizations, such as churches and charities, to provide additional support services for ABAWDs.

## **G. SUMMARY**

The states varied considerably in both the rules for what counts as “work” and how much support and assistance they give ABAWDs in finding and keeping employment. Twenty states had quite flexible rules, always allowing volunteer work to count as meeting the work requirement and work of less than 20 hours a week to count if combined with another qualifying work activity. However, three states allowed neither volunteer work nor combinations of work and participation in other qualifying work activities to count. Most states required at least some ABAWDs to conduct a job search and most offered job search training. However, 11 states neither required job search nor offered job search training.

Many state and local E&T managers complained of a lack of funds for support services. Support services were viewed as important for the ABAWD population both to help ABAWDs who work and those who participate in qualifying work activities. The \$12.50 per person per month assistance of federal matching funds was viewed as inadequate.

The increases in funding for the food stamp E&T program in the BBA were intended to ensure that qualifying work activities were available for all ABAWDs who needed them. While nearly all states offered ABAWDs some qualifying work activities, states varied considerably in how many different types of qualifying work activities they offered and the extent to which the activities were available to all ABAWDs who were subject to the work requirement. While just less than half of all states reported that they had a prearranged slot in workfare available for every ABAWD who wanted one, in 18 states there was no qualifying work activity at all available to some ABAWDs subject to the work requirement.

Despite the fact that there are states that have not provided qualifying work activities for all ABAWDs, much of the federal funding for E&T services for ABAWDs has gone unspent. According to state E&T managers, this results from the difficulties in serving such a small population--the number of ABAWDs is small and many do not wish to participate in qualifying work activities. Some states have found that, because the fixed costs of developing and running programs can be spread over only a small number of people, the reimbursement amount per slot may not be large enough to cover the program costs.

Both state and local E&T managers noted the low participation of ABAWDs in qualifying work activities—a finding that is broadly consistent with available FSP data. Respondents reported that the lack of motivation of some ABAWDs was one reason for low participation. However, respondents also believed that many ABAWDs faced serious barriers to both work and participation in qualifying work activities, including lack of transportation, undocumented medical problems, substance abuse problems, and homelessness.

## **V. ADMINISTERING ABAWD POLICY: TRACKING AND OTHER CHALLENGES**

By making the determination of FSP eligibility more complex, the ABAWD provisions have had repercussions for both the state agencies and the eligibility workers in local FSP offices. According to some respondents to our survey of state FSP directors, the ABAWD provisions were the most difficult policy changes they had ever had to administer. This chapter discusses the issues that arose in administering the ABAWD policy. It describes the tracking of the receipt of time-limited benefits and other challenges faced by the states in administering the policy. Details of the administering of the ABAWD provisions by state appear in Appendix E.

### **A. POLICIES AND PROCEDURES TO TRACK RECEIPT OF TIME-LIMITED BENEFITS**

Under the ABAWD provisions, eligibility is determined not only by the household's financial circumstances in a given month but also by whether the ABAWD participant has received three months of time-limited benefits in a 36-month period. This means that the food stamp agency needs to track, or maintain a history of, each ABAWD participant's receipt of time-limited benefits. States vary in how they define both the three-month time limit and the 36-month period, along with their tracking capabilities, and the extent to which they check for benefit receipt in other localities.

#### **1. Defining the Three-Month Time Limit and the 36-Month Period**

PRWORA gives states some discretion in how to define both the three-month time limit and the 36-month period. At the time of our survey, all states had statewide policies on how to define both periods.

### **a. Defining the Three-Month Time Limit**

How the three-month time limit is defined depends on which month counts as the first month of the three. The most stringent policy, used by six states, is to count the month of application toward the three-month limit (Table V.1). Therefore, if an ABAWD applied for benefits late in the month, the first countable month could include only a few days. The least stringent policy, used by most (36) states, was to count the month in which an ABAWD first received a *full month* of benefits as the first month. The remaining eight states had policies that are between these two extremes.

The choice of how to define the three-month time limit can make a significant difference to ABAWD participants in the amount of benefits they receive without meeting the work requirement. If months of partial benefit receipt are included, some ABAWDs not complying with the work requirement will be eligible for just over two months of food stamp benefits before they are disqualified. On the other hand, if only full months of benefits are counted, some ABAWDs may receive nearly four months of benefits without complying with the work requirement. The final ABAWD regulations require states to count only full months of benefit receipt toward the time limit. In March 2000, 14 states counted partial months of benefit receipt as time-limited months. For them, implementing this aspect of the regulations will increase the number of ABAWDs receiving time-limited benefits.

Respondents from several states remarked that, in practice, some ABAWDs could receive four full months of benefits without meeting the work requirement because they were notified too late of their disqualification. The FSP regulations require clients to be notified of an “adverse action,” such as termination, by a letter sent at least 10 days before the action takes place. If the state does not send the letter out quickly enough, benefits may have already been issued for the fourth month before the state could disqualify the ABAWD.



TABLE V.1  
STATE POLICIES ON DEFINING THE THREE-MONTH  
TIME LIMIT

The First Month of the Three-Month Limit is:	Number of States
Month of Application	6
Month of Certification	1
First Month of Benefit Receipt	4
Month of Application if Application is Before the Middle of the Month	3
First Month of Full Benefit Receipt	36
Total	50

SOURCE: State Food Stamp Directors Survey, 2000

**b. Defining the 36-Month Period**

States have flexibility in how to define the “preceding 36-month period” during which ABAWDs can receive benefits without satisfying the work requirement. By law, the first 36-month period began either on November 22, 1996 or the date on which then-current participants were notified of the ABAWD provisions, whichever was later.

Some states use a *rolling clock*, under which eligibility is always determined by benefit receipt in the preceding 36 months. The beginning and ending dates of the period are the same for each ABAWD participant, but change each month. For example, in December 2000, eligibility depends on the receipt of benefits between December 1997 and December 2000. In January 2001, eligibility depends on the receipt of benefits between January 1998 and January 2001.

In contrast, under a *fixed clock*, eligibility is determined by benefit receipt in a 36-month period with a specified beginning and ending date for each ABAWD that does not change each month. The beginning and ending dates may be the same for all ABAWDs in the state. For example, the fixed periods may have run from December 1996 to December 1999 and then from December 1999 to December 2002 for all ABAWD participants in the state. Alternatively, the

beginning and ending dates may vary by ABAWD participant. The beginning date of the period may, for example, be the date the ABAWD most recently applied for benefits.

A fixed clock of either type implies a less stringent time limit than a rolling clock. Under a fixed clock, an ABAWD can receive more than three months of time-limited benefits in a 36-month period if he or she receives some or all of them more than three months into the fixed period. In this situation, an ABAWD will regain eligibility for benefits at the beginning of the new fixed period, which will be fewer than 36 months after the previous receipt of benefits. If, for example, the fixed clock runs from December 1996 to December 1999 and from December 1999 to December 2002, an ABAWD who received three months of time-limited benefits in September, October, and November 1999 could then continue to receive benefits in December 1999, January 2000, and February 2000 even without satisfying the work requirement.

A fixed clock that is the same for all ABAWDs is less stringent than a fixed clock that begins on the date an ABAWD applies for benefits. When all ABAWDs have the same beginning and ending day of their 36-month period, the “36-month period” will last only a few months for the ABAWDs who apply near the end of the period. The “36-month period” will always be 36 months long if it begins when ABAWDs apply.

Twenty-seven states used a rolling clock, and the remaining 23 used a version of the fixed clock (Table V.2). The ABAWD regulations explicitly allow states to use a rolling clock or a fixed clock to define the 36-month period. Although no state need change its policy for the 36-month period as a result of the regulations, several respondents to our survey said their state is considering switching from a rolling clock to a fixed clock because of the complexity of administering a rolling clock.

TABLE V.2  
STATE POLICIES ON DEFINING THE 36-MONTH PERIOD

Method Used to Define the 36-Month Period	Number of States
Rolling Clock	27
Fixed Clock, Varies by ABAWD	5
Fixed Clock, Same for All ABAWDs	18
Total	50

SOURCE: State Food Stamp Directors Survey, 2000

We checked to see if states were consistent with respect to the stringency of their policies for defining the 3-month time limit and the 36-month period. Only a weak association across states in the stringency of these two policies was observed.

## 2. States' Tracking Capabilities

Tracking the information required to determine an ABAWD's eligibility requires significant changes in the states' information systems. The systems must keep track of the months in which ABAWDs received time-limited benefits, the beginning and ending dates of the 36-month period(s), and whether the ABAWD regained eligibility for an additional three consecutive months.

States vary widely in how quickly they developed tracking systems and in the sophistication of these systems. Many states made changes quickly and were able to implement statewide automated tracking systems soon after the legislation took effect. Fifteen states implemented such systems before the end of 1997. However, at the time of this writing, other states were still working on the development of such systems or had deferred system development.

We categorize the states' tracking systems in March 2000 into four groups of sophistication as follows:

1. No statewide automated tracking system (12 states)

2. Very limited statewide tracking system (5 states)
3. Partially automated statewide tracking system (7 states)
4. Completely automated statewide tracking system (26 states)

The majority of states operated systems that could track ABAWDs statewide, but these systems varied in the amount of information they provide to the eligibility workers. By March 2000, 33 states had a sophisticated tracking system that stored most of the information necessary to determine ABAWDs' eligibility (categories 3 and 4 above). Twelve states had no statewide automated tracking systems at that time.

**a. No Statewide Automated Tracking System**

In most states that have no statewide automated tracking system, eligibility workers use a form to track months of time-limited benefit receipt.<sup>1</sup> The tracking form is usually a paper form in the case file, but some offices use an electronic form in an electronic case file. Without a statewide tracking system, eligibility workers do not have easy access to information on time-limited benefits the client may have received in other counties. Hence, the eligibility workers need to determine (from a paper tracking form maintained locally and by letters or telephone calls to other local offices) the months in which ABAWDs receive benefits in the 36-month period, whether they were exempt or waived during that time and, if not, whether they were satisfying the work requirement.

**b. Very Limited Statewide Tracking System**

These systems include a history of all benefits received by ABAWDs anywhere in the state, but the history does not indicate the months in which these benefits were time-limited. Hence,

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<sup>1</sup> We include New York in this category because it has no statewide system. However, some New York counties operate automated tracking systems that determine how many months of benefits the client has received in that county.

the information on months the ABAWD received benefits is available on-line, but information on whether the ABAWD was exempt or waived, and if not, whether he or she was satisfying the work requirement is not available electronically. Again, the eligibility workers need to consult case files and may need to contact other local offices.

**c. Partially Automated Statewide Tracking System**

In these systems, a statewide on-line benefit history is available to eligibility workers and the history indicates the months the ABAWD received time-limited benefits. Hence, the eligibility workers need not consult other sources to determine whether the ABAWD was exempt or waived in a month, or whether he or she was satisfying the work requirement.

This type of system differs from a completely automated system in that the eligibility workers must count the months of time-limited benefit receipt to determine eligibility. This may be somewhat burdensome because it requires the eligibility worker to know when the ABAWD's 36-month clock started.

**d. Completely Automated Statewide Tracking System**

The most sophisticated systems automatically calculate the number of months an ABAWD participant received time-limited benefits and determine whether the ABAWD is currently eligible for food stamps. Eligibility workers do not need to look back at the benefit history, since the system provides the information on a screen, nor do they need to know when the 36-month clock began. Respondents from four states with such systems reported that eligibility workers are also required to keep a paper tracking form in the client's case file as a backup in case the computer is down or if information is not data entered correctly.

### **3. Procedures for Tracking ABAWDs Who Move within and between States**

In states with an automated statewide tracking system, checking for previous receipt of food stamps in other localities within the state is easy and straightforward. Without such a system, however, the eligibility worker can obtain information on the client's earlier receipt of time-limited benefits only by contacting other local offices in the state. Because it is impractical to contact every local office in the state when evaluating an ABAWD's application, the eligibility worker must either rely on the applicant's own report of previous benefit receipt or contact some limited subset of offices (in neighboring counties, for example).

No states currently link their electronic ABAWD tracking systems to tracking systems in other states and no national database of FSP participants or ABAWDs currently exists. As a result, eligibility workers have no means of checking whether an ABAWD has received benefits in another state *unless* the ABAWD indicates that he or she lived in another state. If the eligibility worker knows or suspects that an ABAWD has received benefits in another state, he or she would need to contact the other state to find out how many countable months of time-limited benefits the ABAWD had received.

All but one state without statewide tracking systems required eligibility workers to check on receipt of benefits in other localities in the state if the client reported receiving benefits there. And 44 states required eligibility workers to check on receipt of benefits in other states if the client reported receiving benefits there. The final ABAWD regulations explicitly require that eligibility workers check on benefit receipt in another state if the ABAWD indicates that he or she has received benefits there.

### **B. CHALLENGES IN ADMINISTERING ABAWD POLICY**

Although we did not directly ask the respondents to the State Food Stamp Director Survey for their general opinion about the ABAWD provisions, 21 of the 50 respondents said that they

would like to see either the ABAWD time limit and/or work requirement removed. Although some respondents view the ABAWD provisions as unfairly penalizing the targeted population, more respondents disliked the provisions because of the difficulties in administering them. They view the expense and time spent administering the provisions as too burdensome, especially given the small size of the ABAWD population. Survey respondents cited the following three main challenges, listed in order of difficulty, in administering the ABAWD provisions:

1. Tracking (30 states)
2. Ensuring that eligibility workers implement the policy correctly (22 states)
3. Translating the ABAWD provisions of PRWORA and the BBA into state policy (12 states)

In addition, when asked specifically about the challenges of administering ABAWD policy, many respondents also talked about the difficulties of providing qualifying work activities to ABAWDs. These difficulties, discussed in detail in Chapter IV, include the personal barriers many ABAWD participants face, as well as a lack of sufficient supportive services and constraints related to the funding of E&T services.

## **1. Tracking**

Thirty of the 50 respondents said that tracking has been a major challenge in administering the ABAWD provisions. To quote several respondents, “Tracking is a nightmare.” Respondents gave three broad reasons for why tracking is such a challenge: (1) developing the automated tracking system is problematic, (2) using the automated tracking systems is problematic, and (3) the activity is a burden on the eligibility workers.

### **a. Problems in Developing the Automated Tracking System**

Because the ABAWD provisions required such fundamental changes to states’ existing automated systems, developing an automated tracking system proved expensive, difficult, and

time-consuming. A respondent from one state pointed out that it was particularly challenging to develop a tracking system while ensuring that the state computer system's would comply with the Year 2000 requirements. Another state had just completed a major overhaul of its automated eligibility system and did not believe it had the resources for another overhaul. Some state FSP agencies lacked the staff with the skills needed to change their systems and had to hire outside contractors, incurring additional cost, to make the changes.

**b. Problems Using the Automated Tracking System**

The automated tracking systems do not always work as intended. Some systems are still exhibiting start-up difficulties. Four respondents to the State Food Stamp Director Survey complained that their automated tracking systems still have bugs. Respondents in three states said that their system does not yet contain 36 months of data. Another problem cited by two respondents is that relevant data are not consistently entered into the database or that they are entered incorrectly. As part of this study, we visited a local office that has an automated statewide tracking system, but the eligibility workers track benefit receipt with a paper form because the information on the tracking system was deemed unreliable.

**c. Burden on the Eligibility Workers**

Tracking places a burden on eligibility workers. Even in states with automated statewide tracking systems, eligibility workers need to call offices in other states to check on benefits that may have been received in those states. If tracking is not automated, eligibility workers also need to keep track, in the ABAWD's case file, of all receipt of time-limited benefits and may need to call offices in other localities within the state.



## 2. Ensuring That Eligibility Workers Implement the Policy Correctly

Respondents in 22 states said that the ABAWD policy is confusing, and that administering it has been time-consuming for eligibility workers. One respondent complained that this confusion increased the quality control error. Several managers in local offices seemed confused about state ABAWD policy. For example, one manager was confused about the number of hours an ABAWD was required to participate in workfare, and another manager thought that participation in education programs was not a qualifying work activity.

Tracking was mentioned most often as a problem for eligibility workers. Other aspects of the policy that were challenges for eligibility workers included:

- ***Regaining Eligibility within the 36-Month Period.*** Eligibility workers are especially confused about the part of the law that allows ABAWDs to regain FSP eligibility for an additional three consecutive months.
- ***The Rolling Clock.*** Respondents described using a rolling clock as especially difficult both to implement and to explain to ABAWDs. Several states said they are planning to convert from a rolling clock to a fixed clock to reduce this burden.
- ***Partial Waivers.*** Partial waivers—waivers that cover only some of the clients in an office—are particularly difficult to administer. However, state interview respondents in only six of the 22 states with partial waivers viewed them as a problem. Evidence from the county interviews, however, suggests that the state respondents may have been unaware of some of the local problems. Other than general confusion resulting from partial waivers, specific problems mentioned by include the burden of determining whether the client lives in a waived area and explaining the rules to the client.
- ***Losing a Waiver.*** Eligibility workers also have difficulty when an area loses its waiver and needs to introduce the ABAWD provisions.
- ***Reconciling the ABAWD Work Requirement with the FSP Work Registration Requirement.*** The eligibility workers need to apply two different criteria for determining whether a client is an ABAWD and whether that client is required to register for work. For example, a person responsible for the care of a child over six is usually exempt from the ABAWD provisions but is subject to work registration. Such differences are often confusing.
- ***15 Percent Exemption.*** A respondent from one state said it was particularly difficult to explain to eligibility workers the criteria for applying the 15 percent exemption.

### **3. Translating the Law into State Policy**

PRWORA and the BBA allow the states considerable flexibility in setting ABAWD policy. However, many state agencies view the law as confusing and difficult to interpret. Several respondents requested more guidance on how to set ABAWD policy. The 15 percent exemption is viewed as particularly problematic. Respondents from six states reported that it is difficult to estimate how many ABAWDs would be exempted under different criteria for applying the 15 percent exemption. At the time of the interview, at least one state agency was unaware that the 15 percent exemption could be used to exempt all ABAWDs in a geographic area. Several respondents remarked that it is difficult to collect the information to apply for waivers, especially for Indian reservations, where labor market information is often not readily available.

The final ABAWD regulations, by clarifying some aspects of the ABAWD provisions, such as the criteria for awarding waivers, the requirement for medical certification, and what counts as “work” for the purpose of the work requirement, may remove some confusion. However, the state agencies view the ABAWD provisions as inherently complicated.

### **C. SUMMARY**

The ABAWD provisions are complex and quite different from previous food stamp rules. Hence, not surprisingly, both state and local agencies have found them challenging to implement. And because the ABAWD provisions affect a relatively small number of persons, their complexity is perceived as especially burdensome. The greatest implementation challenge is tracking, and states vary considerably in their success at meeting this challenge. While more than half of all states have sophisticated tracking systems, about one-quarter of all states still require eligibility workers to manually track the receipt of time-limited benefits.

## VI. CONCLUSIONS

This study provides a wide range of findings with respect to the number and characteristics of persons affected by the ABAWD provisions of PRWORA, state policy choices for implementing these provisions, and the challenges states faced in doing so. Here, we present seven main conclusions and close with some observations on assessing the impact of the ABAWD provisions.

### A. THE ABAWD POPULATION IS SMALL

In March 2000, there were approximately 422,000 ABAWD participants in the FSP, comprising 2.5 percent of the entire FSP caseload. This number is as small as it is for two reasons. First, the definition of an ABAWD is quite restrictive. Nearly two-thirds (66 percent) of all FSP participants were too young or too old to be ABAWDs. Another 20 percent of FSP participants were excluded because they had dependents. An additional 9 percent were medically certified as unfit for employment, and 3 percent were pregnant or exempt from work registration.

The number of ABAWD participants would increase by 40 percent if we included those participants who were exempt from work registration solely because they worked 30 hours per week or earned at least 30 times the federal minimum hourly wage. This would bring the number of ABAWD participants in March 2000 to 590,000 or 3.4 percent of the FSP caseload.

The second reason for the small number of ABAWD participants is the steep decline in participation among this population. This group has decreased in size even more rapidly than the entire FSP caseload. In FY96, before the ABAWD provisions went into effect, there were more than one million ABAWD participants, who made up 4.0 percent of all participants.

Barely half of the ABAWD participants—216,000 or only 1.3 percent of all FSP participants—were subject to the time limit. This is because the states used waivers to exempt

190,000 ABAWDs, and 16,000 of the ABAWDs in nonwaived areas were covered under the 15 percent exemption.

## **B. MANY ABAWDS WHO LEFT THE PROGRAM DID NOT RETURN**

Approximately 200,000 ABAWDS used up their time-limited benefits and were terminated from the FSP during the first six months after the ABAWD provisions were implemented. Through the first year the cumulative number of terminations exceeded 350,000. Unless they re-established eligibility by meeting the work requirement as nonparticipants or qualified for benefits as non-ABAWDs, those who were terminated would not have become eligible again as ABAWDs until at least November 1999. In the 18 states that define the 36-month period with the same beginning and ending date for *all* ABAWDs, those terminated during the first three years after implementation would have become eligible again at the same time, when states reset their 36-month clocks in November or December 1999. This created the potential for a sizable rebound in participation by ABAWDs beginning late in 1999.

Neither the number of ABAWD participants through September 2000 nor the number of terminations through March 2000, however, shows any evidence of an upswing in participation by ABAWDs. While the decline in the number of ABAWD participants appears to have ended in late 1999 or 2000, perhaps as a result of ABAWDs returning to the program, this stabilization of the ABAWD caseload represents only a small deviation from the trend in early 1999. If the return of previously terminated ABAWDs played any role, this could not have involved more than a small fraction of those who used up their time-limited benefits in 1997. Although some may have returned to the FSP as non-ABAWDs, the inference that many simply gave up on receiving food stamps provides a more plausible explanation. None of our state or local respondents gave any indication that ABAWDs who left the program were returning. Finally,

advocates observed that outreach efforts made to coincide with the resetting of state clocks were largely unsuccessful, which supports this interpretation.

### **C. DIVERSE FACTORS AFFECT STATES' POLICY CHOICES**

We found surprisingly little association between states' policy choices on different aspects of ABAWD policies. Few states made policy choices that consistently had either a positive or negative effect on the number of persons subject to the time limit. Most states had some policies that increased the number of persons subject to the time limit, and others that decreased the number of persons subject to the time limit. And while some states that provided few opportunities to participate in qualifying work activities had waivers and other policies designed to exempt many persons from the time limit, others did not apply for waivers and limited the number of exemptions.

One reason for this lack of correlation between policies is that multiple factors played a role in the choice of policies. For example, some states chose to set fixed beginning and ending dates for the 36-month period (a fixed clock) because this is easier to administer. In addition, different players within the state were responsible for different policy decisions, and these players sometimes had philosophical differences. For example, in many states the governor's office had a say in whether the agency would apply for waivers, while the food stamp agency made decisions about other aspects of ABAWD policy. Advocacy organizations were very active in promoting the use of waivers and the 15 percent exemption but much less active with respect to other policy areas.

The concurrent implementation of major changes in the cash assistance program also affected states' policy choices. Some states and counties viewed certain of the ABAWD provisions as being inconsistent with TANF policies. For example, some argued that requesting waivers for areas with high unemployment or insufficient jobs was inconsistent with requiring

that TANF recipients find work in the same areas. They cited this conflict to support their decisions to not pursue or not implement approved waivers. In another area of policy, two states set the age at which children are considered “dependents” at six or seven to be consistent with the TANF policy. Finally, some states and advocates suggested that the need to develop work and training opportunities for the larger and, arguably, more worthy population of TANF recipients drew attention away from ABAWDs.

#### **D. STATE POLICIES AFFECT THE NUMBER OF PARTICIPANTS WHO ARE SUBJECT TO THE TIME LIMIT**

PRWORA and, later, the BBA allowed states to influence the number of participants affected by the ABAWD provisions in five principal ways: (1) the use of federal waivers to exempt qualifying geographic areas, (2) the use of the 15 percent exemption, (3) the determination, prior to FNS’s issuance of final regulations, of what constituted responsibility for a dependent child, (4) the establishment of rules—limited by the final ABAWD regulations—governing the determination of who was considered mentally and physically fit for employment, and (5) the development of E&T slots to enable participants without steady jobs to meet the work requirement and become more work-ready.

In March 2000, 190,000 ABAWD participants or 45 percent of the total number were exempt from the time limit because they lived in waived areas. Some of these ABAWDs would have exhausted their time-limited benefits if they had lived in nonwaived areas. ABAWDs accounted for 6 percent of all participants 18 to 50 in nonwaived areas but 12 percent in waived areas. If all of this difference is due to waivers we could infer that there would have been 91,000 fewer ABAWDs in the absence of waivers. This is an upper limit to the effect of the waiver policy, however, because it is likely that other factors, such as errors in the estimates of ABAWDs and differences in the availability of jobs, contribute to the difference in the incidence of ABAWDs between waived and nonwaived areas.

About 16,000 ABAWD participants received 15 percent exemptions. Not all of these ABAWDs would have exhausted their time-limited benefits prior to receiving the exemption. This is because many states use the 15 percent exemption to exempt entire areas, just as they use waivers. When they do so, FNS allows them to include all ABAWDs in the exemption counts that they report to the agency rather than just those participants who have used up their time-limited benefits. We estimate that as many as a third of the participants with 15 percent exemptions in March 2000 would have been eligible to receive benefits without the exemptions.

While we cannot observe the direct effects of state policy defining responsibility for a dependent child, we can estimate the effects using FSPQC data. If all of the states had exempted no more than one adult in a household with dependent child, the monthly average number of ABAWD participants would have been 87,000 higher than if all of the states had exempted all adults—the policy specified in the final regulations. In fact, only a few states chose to exempt only one adult per household, but nearly half the states adopted a policy that did not automatically exempt all adults. We estimate that the change in state policy to comply with the regulations will redefine as many as 38,000 ABAWD participants to be non-ABAWDs. Furthermore, we estimate that a majority, as many as 22,000, of these participants are in nonwaived areas, where as ABAWDs they would have been subject to the time limit.

We estimated a number of multivariate models in an attempt to measure the impact of additional state policy choices and a variety of other factors on the fraction of adults subject to the ABAWD time limit. While we found some statistically significant effects, the patterns were difficult to interpret. We concluded that our data were too limited and the determination of variation in the size of the ABAWD population too complex to allow valid inferences about the effects of ABAWD policy by this methodology.

## **E. THE ABAWD PROVISIONS ARE COMPLEX AND DIFFICULT TO ADMINISTER**

Nearly all respondents to the State Food Stamp Program Director Survey viewed ABAWD policy as excessively complicated and difficult to administer. The policy was viewed as particularly burdensome given the small population that was affected by the policy.

Respondents identified the need to track the receipt of time-limited benefits over a 36-month period as the most difficult aspect of the policy. Development of automated systems to track receipt of time-limited benefits was technically challenging, time-consuming, and costly. While 14 states had statewide, automated tracking systems by the time the ABAWD provisions went into effect, others completed such systems only later, and 12 states still had no statewide tracking systems in March 2000.

Even when statewide tracking systems are in place, operational challenges remain. For example, no automated procedures exist to track the receipt of benefits by ABAWDs who move across states. Eligibility workers in all states need to call out-of-state local offices if they are told or have reason to believe that a client received benefits in another state. In addition, respondents reported that tracking systems do not always work as intended and require accurate data entry to ensure that benefit status is appropriately reported.

More generally, respondents to our surveys reported that the complexity of the ABAWD provisions made them difficult for state administrators, eligibility workers, and clients to understand. Eligibility workers complain that allowing ABAWDs to regain eligibility for three consecutive months within the 36-month period is extremely difficult to administer and to explain to clients. Similarly, enforcing the time limit is especially difficult if the beginning and ending dates of the 36-month period change each month as they do under a rolling clock. Finally, eligibility workers find it difficult to apply two different sets of criteria to determine who is exempt from work registration and who is exempt from the ABAWD work requirement.



**F. HALF OF ALL PARTICIPANTS WHO WERE SUBJECT TO THE TIME LIMIT WERE MEETING THE WORK REQUIREMENT**

One-half of ABAWD participants who were subject to the time limit in March 2000 were meeting the work requirement. These participants can receive food stamps for as long as they met the work requirement and remain income-eligible. Almost one-quarter of ABAWDs who were subject to the time limit were meeting the work requirement by working. An equal fraction met the work requirement by participating in workfare while only 4 percent met the requirement through education and training or other qualifying work activity. The remaining ABAWDs who were subject to the time limit received time-limited benefits.

These estimates do not include participants who were exempt from the time limit solely because they were working 30 hours or more or earning more than 30 times the minimum wage. Such persons are exempt from work registration and, therefore, are defined to be outside the ABAWD population. Counting them as ABAWDs subject to the time limit increases the percentage who are meeting the work requirement from 51 percent to 68 percent.

**G. WHILE SOME ABAWDs MAY BE UNWILLING TO MEET THE WORK REQUIREMENT, OTHERS ARE NOT ABLE TO MEET IT**

The intent of PRWORA was to place a time limit and a work requirement on FSP participants who were *able to work*—persons who were able-bodied, did not have family responsibilities that prevented them from working, and lived in areas with available jobs. And the BBA provisions on Food Stamp E&T were designed to provide sufficient funding for states to provide qualifying work activities for all ABAWDs who could not find work. If these two legislative actions worked as intended, the only persons who would not meet the work requirement would be those who did not *want* to work or participate in a qualifying work activity.

Many state and local FSP staff who responded to our surveys expressed the opinion that some ABAWDs are indeed unmotivated and do not want to participate in a qualifying work activity. Local E&T managers reported that when offered a place in a qualifying work activity, many ABAWDs do not show up for the activity. However, the responses to our surveys also indicate that qualifying work activities appropriate to their individual needs were not available to all ABAWDs and that ABAWDs faced many barriers to participating in these activities.

### **1. Despite Generous Federal Funding, Qualifying Work Activities Are Not Available For All ABAWDs**

In FY99, 22 states did not have a qualifying work activity for all ABAWDs who wanted one either because they did not offer qualifying work activities in all FSP offices in nonwaived areas or did not have enough slots to provide the activity for all ABAWDs who wanted to participate. And five states provided no qualifying services at all through their E&T program.

The lack of qualifying work activities for all ABAWDs who wanted to participate was not, however, because of a lack of federal funding. In FY99, the states spent only 43 percent of total available federal E&T funds. Only five states spent more than 80 percent of their allocated funds. The respondents to our survey gave four main reasons for spending so little of the federal E&T funds. First, because there are so few ABAWDs to serve, providers of work activities were concerned that the reimbursement cap per slot would be too low to cover the fixed costs of developing and operating the programs. Second, some states were discouraged from using the funds because of administrative requirements. Third, some states viewed providing work activities to ABAWDs as ineffective in moving them toward self-sufficiency. Fourth, some states did not want to provide services to ABAWDs that they could not provide to a broader population.

## **2. Many ABAWDs Face Significant Barriers to Both Work and Participation in Qualifying Work Activities**

According to state and local food stamp agency staff, many ABAWDs face significant barriers to both work and participation in qualifying work activities. The most frequently cited barriers are mental illness, substance abuse, homelessness, and lack of transportation. Other barriers include inability to speak English, illiteracy, and a criminal record.

By definition, ABAWDs are supposed to be “able-bodied.” However, many survey respondents said that some ABAWDs who are in fact unfit for work do not get certified as such. These ABAWDs either did not want to go to a health professional or could not afford to go. This is especially an issue for ABAWDs suffering from mental illness.

Lack of transportation was also reported to be an important barrier for some ABAWDs, especially those living in rural areas. The federal government matches only \$12.50 in state expenditures per participant per month for transportation and other supportive services. Many respondents viewed this as much too little.

## **H. THE ABAWD PROVISIONS: ASSESSING THEIR IMPACT**

When Congress added the ABAWD provisions to PRWORA, the goal was to encourage qualified FSP participants to become more self-sufficient through employment and to severely limit the benefits of those who did not work or participate in a qualifying work activity. After four years there is ample evidence that many participants who were defined as ABAWDs exhausted their time-limited benefits and more limited evidence suggesting that many of these did not return to the FSP after regaining their eligibility. The number who exhausted their benefits would have been substantially higher if states had not used waivers and the 15 percent exemption to exempt many ABAWDs from the time limit.

It is much more difficult to document the extent to which the ABAWD provisions have succeeded in encouraging FSP participants to find and maintain employment. The ABAWD

participants who were meeting the work requirement through employment in March 2000 and the additional, employed participants who would have been counted as ABAWDs had they been working fewer than 30 hours could be numbered as successes. However, an unknown fraction of these persons would have been working even in the absence of a time limit. At the same time, those who succeeded so well at employment that they no longer qualified for food stamps do not show up in the program rolls. Studies that collect data from ABAWD participants over time and compare the experiences of participants in waived and nonwaived areas are required to assess how the ABAWD provisions have affected the employment activity and well-being of those who were subject to the time limit.

What we know from earlier research is that many of those likely to be affected by the ABAWD provisions tend to have fairly short spells of participation—less than six months—bracketed by employment. This pattern of participation implies very different needs with respect to food assistance and work-related services than we would expect to find among those ABAWDs with very limited work experience. Our analysis of state tabulations and FSPQC sample data indicates that those who are meeting the work requirement at any one time differ little in their demographic characteristics from those who are not. That some are meeting the work requirement and some are not is due in part to geographic variation in the availability of qualifying work activities, which we have documented. But the comments from our state and local respondents suggest that many of those who are not meeting the work requirement may in fact hold attitudes or face personal barriers that are not adequately addressed by the activities that *are* available to them. Outside of a few states, only a small fraction of ABAWDs are meeting the work requirement through participation in workfare or education and training. This pattern is likely to continue in the absence of significant improvements in the matching of individuals to programs that best suit their needs. However, the small size of the ABAWD population remains

a limiting factor in the development of an appropriately broad menu of programs that can be offered in a great many localities.

## REFERENCES

- Botsko, Christopher, Vivian Gabor, Susan Schreiber, and Susan Pachikara. "Report to Congress on State Use of Funds to Increase Work Slots for Food Stamp Recipients." Washington, DC: ERS' Food Assistance and Nutrition Research Program, October 2000.
- Castner, Laura. "ABAWD Data in the 1998 FSPQC File." Washington, DC: Mathematica Policy Research, Inc., January 2000.
- Cody, Scott and Laura Castner. "Characteristics of Food Stamp Households: Fiscal Year 1997." Washington, DC: Mathematica Policy Research, Inc., February 1999.
- Czajka, John L. "Evaluation of the ABAWD Code in the Food Stamp Quality Control Data." Washington, DC: Mathematica Policy Research, Inc., August 2000.
- Czajka, John L., Vivian Gabor, Sheena McConnell, and Michael Stavrianos. "Data Collection Plan for the Study of the Food Stamp Time Limits on Able-Bodied Adults without Dependents." Washington, DC: Mathematica Policy Research, Inc., October 1999.
- Gabor, Vivian. "Summary of Findings on State Food Stamp Policy Choices Regarding Provisions for Able-Bodied Adults without Dependents (ABAWDs)." Washington, DC: Health Systems Research, Inc., February 1998.
- Garasky, Steven, Helen Jensen, Sarah Nusser, and Cory Wessman. "What is Happening to Food Stamp Exiters in Iowa?" Paper presented at the 22<sup>nd</sup> Annual Research Conference of the Association for Public Policy Analysis and Management." Seattle, WA: November 2000.
- Mills, Gregory and Robert Kornfeld. "Study of Arizona Adults Leaving the Food Stamp Program: Final Report." Cambridge, MA: Abt Associates, Inc. December 2000.
- Rangarajan, Anu and Philip Gleason. "Food Stamp Leavers in Illinois: How are They Doing Two Years Later?" Princeton, NJ: Mathematica Policy Research, Inc. January 2001.
- Stavrianos, Michael and Lucia Nixon. "The Effect of Welfare Reform on Able-bodied Food Stamp Participants." Washington, DC: Mathematica Policy Research, Inc., July 1998.
- Stavrianos, Michael, Scott Cody, and Kimball Lewis. "Characteristics of Childless, Unemployed Adult and Legal Immigrant Food Stamp Participants: Fiscal Year 1995." Washington, DC: Mathematica Policy Research, Inc., February 1997.
- U.S. Department of Agriculture, Food and Nutrition Service. "Cumulative Questions and Answers on Certification and Work Issues in PRWORA." Alexandria, VA: USDA, August 15, 1997.
- U.S. General Accounting Office. "How States Are Using Federal Waivers of the Work Requirement." GAO/RCED-00-5. Washington, DC: GAO, October 1999.
- U.S. General Accounting Office. "Food Stamp Program: Information on Employment and Training Activities." GAO/RCED-99-40. Washington, DC: GAO, December 1998.

U.S. General Accounting Office. "Welfare Reform: State and Local Responses to Restricting Food Stamp Benefits." GAO/RCED-98-41. Washington, DC: GAO, December 1997.

**APPENDIX A**  
**SUMMARY OF FINAL ABAWD REGULATIONS**



The final regulations on the ABAWD provisions of PRWORA were published on January 17, 2001. These regulations became effective on August 1, 2001 and must be implemented by the state agencies by October 1, 2001. This appendix summarizes the seven main elements of the regulations.

#### **A. MEETING THE WORK REQUIREMENT**

1. An ABAWD who works 20 hours a week or 80 hours a month meets the work requirement
2. Unpaid work under standards established by the state agencies counts as work
3. Work paid in kind counts as work
4. Persons who have missed work for good cause as determined by the state agency will be considered to meet the work requirement
5. Qualifying work programs may contain job search as a component, but job search must be less than half of the requirement
6. The work requirement can be met by combining hours of work and participation in a work program
7. State agencies are given the option to count unreported work as work

#### **B. IMPLEMENTING THE TIME LIMIT**

1. State agencies can use either a fixed or rolling clock to measure the 36-month period
2. Partial months do not count toward the time limit
3. Benefits erroneously received are counted as having been received until they are repaid in full

#### **C. ESTABLISHING VERIFICATION AND REPORTING REQUIREMENTS**

1. State agencies must verify the work hours for individuals subject to the time limit
2. Individuals are required to report when the number of hours they work falls below 20 hours a week, averaged monthly

#### **D. TRACKING THE RECEIPT OF TIME-LIMITED BENEFITS**

1. State agencies must verify the countable months an individual has used in another state if there is an indication that the individual participated in another state. The state may accept the other state's assertion as to the number of countable months the individual has used in the other state

#### **E. EXEMPTING INDIVIDUALS FROM THE WORK REQUIREMENT**

1. An individual is exempt from the ABAWD requirement if he or she is under 18 or 50 years or older
2. Medical certification of physically or mentally unfit for employment is required only where the unfitness is not evident to the eligibility worker
3. Medical certification may include a statement from a nurse, nurse practitioner, designated representative at a doctor's office, social worker, or other medical personnel the state agency deems appropriate
4. The receipt of disability benefits is indirect proof that there has been a medical certification of a condition making the person unfit for employment
5. An individual is exempt if he or she is a parent of a child under the age of 18 or is living in a household where a member is under the age of 18
6. A person in any trimester of pregnancy is exempted

#### **F. REGAINING ELIGIBILITY**

1. An individual can regain eligibility if he or she works 80 hours in any 30 consecutive days.
2. The state agency has the option to prorate benefits from the date the "cure" is complete or back to the date of application. The state agency also has the option to determine eligibility for ABAWD purposes prospectively.
3. There is no limit on the number of times an individual may regain and then maintain eligibility by fulfilling the work requirement
4. The window of eligibility for the second three-month period starts on the date the state agency learns that the person has lost his or her job
5. If an individual "forfeits" the opportunity to use the three consecutive countable months (for example, due to a voluntary quit sanction), the individual may work another 80 hours in a 30-day period and regain eligibility again for three consecutive months.

## **G. APPLYING FOR WAIVERS**

1. To support a claim that an area has a 10 percent or higher unemployment rate, a state agency could provide the following evidence: (1) a recent 12-month average unemployment rate over 10 percent, (2) a recent 3-month average unemployment rate over 10 percent, or (3) a historical seasonal unemployment rate of over 10 percent
2. To support a claim that an area has a lack of sufficient jobs, a state agency could provide the following evidence: (1) the Department of Labor's Employment and Training Administration has designated the area as a labor surplus area, (2) the Department of Labor's Unemployment Insurance Service has designated the area as qualifying for extended unemployment benefits, (3) the area has a low and declining employment-to-population ratio, (4) the area has a lack of jobs in declining occupations or industries, or (5) the area has a 24-month average unemployment rate 20 percent above the national average for the same period.
3. FNS will approve a waiver if a state agency submits and FNS confirms (1) data from the BLS or BLS cooperating agency that shows the most recent 12 month average unemployment rate in the area is over 10 percent, (2) data from the BLS or the BLS cooperating agency that an area has a 24-month average unemployment rate that exceeds the national average by 20 percent for any 24-month period, or (3) evidence that the area has been designated as a Labor Surplus Area
4. Data submitted to request a waiver for areas with unemployment rates higher than 10 percent must be based on BLS data or methods
5. Waivers can not be approved for more than one year
6. State agencies have discretion in defining the geographic area covered by waivers

**APPENDIX B**

**SOURCE OF QUANTITATIVE ESTIMATES OF ABAWDS**

In Chapter II of this report we presented estimates of the number and characteristics of ABAWDs. These estimates were based on four sources:

1. Tabulations provided by the states in response to a request (reproduced in Volume II)
2. Caseload (micro) data submitted by five states in place of tabulations
3. FSPQC sample data
4. Data submitted to FNS by the states on Form FNS 583

In this appendix we outline the procedures that we used to combine these data sources to develop both state and national estimates of ABAWD participants and their characteristics. We discuss, first, our estimates of the number of ABAWDs participating in the FSP.

#### **A. NUMBER OF ABAWDS PARTICIPATING IN THE FSP**

In our request to the states we asked for separate counts of ABAWD participants in waived and nonwaived areas. Because ABAWDs in nonwaived areas are subject to the time limit while those in waived areas are not, states have much more reason to monitor the former than the latter and to have designed their data systems accordingly. Thus a state might be able to produce a count of ABAWDs in nonwaived areas without being able to produce a count in waived areas, but the reverse would not be true. Alternatively, a state might be able to report the total number of ABAWD participants but not break this down into waived and nonwaived areas. In response to our request, then, a state with waivers may have reported counts of both the waived and nonwaived ABAWD participants, just the nonwaived count, just the total count, or neither. A state with no waivers would have reported the nonwaived count (which is also the total count) or no count. The District of Columbia, which is fully waived, would have reported the waived count or no count. If every state reported the counts that were requested, we would have received 74 counts from the 37 states with waivers and 14 counts from D.C. and the states with no waivers, for a grand total of 88.

Table B.1 presents the counts that were reported by the states (tables appear at the end of this appendix). Altogether, 41 states reported at least one of the requested counts. Of the states with waivers, including D.C., 24 reported both the waived and nonwaived counts, 5 reported just the nonwaived count, 2 reported just the total count, and 7 reported nothing. Of the states without waivers, 10 reported the nonwaived count, and 3 reported nothing. Thus counts of ABAWD participants in nonwaived areas were reported by 39 states, and counts of total ABAWD participants were reported by 36 states.

At a minimum, then, we needed to impute counts of ABAWDs to the following sets of areas in order to prepare complete national estimates:

- Nonwaived areas in 8 states with waivers
- Nonwaived areas in 3 states without waivers
- Waived areas in 7 states that reported counts for just the nonwaived areas or the total
- Waived areas in 6 states that reported nothing
- D.C.

This yields a total of 25 counts that were missing and needed to be imputed.<sup>1</sup>

Our source of information from which to impute the missing data is the FSPQC sample file. These data allow the development of estimates of ABAWD participants through two independent approaches. The first is to use the participant's age, household composition, receipt of disability benefits, and work registration exemption to simulate ABAWD status among the sample members in a given state. This yields an estimate of the total number of ABAWDs. If the state

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<sup>1</sup> If we have a count of ABAWD participants in nonwaived areas but not in waived areas, this represents one missing count because we will know the total number of ABAWDs once we know how many ABAWDs were in waived areas. Similarly, if we have a count of total ABAWD participants but not a breakdown by waived and nonwaived areas, this also represents one missing count because we will know the waived count once we know the nonwaived count.

has waivers, the estimated total must be disaggregated into waived and nonwaived areas. This can be done quite readily by using the county code on the FSPQC file to distinguish residents of waived and nonwaived areas. Some waived counties are only partially waived, however, and the FSPQC file provides no additional geographic information with which to subdivide counties.

The second approach makes use of an ABAWD status code that was introduced into the FSPQC file in FY98. The ABAWD code is designed to identify those persons whom a state has defined as ABAWDs, and it distinguishes between ABAWDs in waived and nonwaived areas, even when they reside in partially waived counties. It also breaks down the ABAWDs in nonwaived areas into those who are covered by the 15 percent exemption, those who are meeting the work requirement, and those who are not meeting the work requirement. The ABAWD code assumes the following values:

1. ABAWD in a waived area
2. Not an ABAWD
3. Exempt based on 15 percent option
4. ABAWD in first three time-limited months
5. ABAWD in second three time-limited months
6. ABAWD who has exhausted time-limited benefits
7. ABAWD meeting work requirement
8. ABAWD in a non-exempt area (and codes 1 through 7 do not apply)

Codes 4, 5, and 6 identify ABAWDs who are subject to the time limit and not meeting the work requirement. Code 7 identifies those who are subject to the time limit but *are* meeting the work requirement. Code 8 is ambiguous, and the written documentation provides no additional explanation. We can imagine that code 8 might be assigned to persons who meet the state definition of an ABAWD but nevertheless have an exemption—perhaps only temporarily. The

fact that a participant with code 8 was not assigned a code of 4 through 7 suggests that this person is neither using up time-limited benefit-months nor meeting the work requirement. But this is purely speculation.

If the ABAWD code were applied as intended, it could help us not only with the imputation of counts of ABAWD participants in waived and nonwaived areas but with the imputation of the proportion of ABAWDs meeting the work requirement. Unfortunately, the application of the code in many states is flawed. For example, the code identifies far too many participants as ABAWDs in waived areas—including large numbers who are too young or too old to be ABAWDs—and too few ABAWDs with the 15 percent exemption (Castner 2000, Czajka 2000). In addition, the ambiguous code 8 is assigned to a large fraction of the ABAWDs in some states. Codes 4 through 7 are much less problematic, however. While they are sometimes inconsistent with other characteristics in the FSPQC data that bear on ABAWD status (age, presence of children, exemption from work registration), on the whole these four codes do seem to identify ABAWDs. They may misidentify some participants as ABAWDs and fail to identify others, and they may have biases that, likely, vary by state, but they provide a credible alternative to simulated ABAWD status. In theory, these four codes ought to be better than the simulation because they reflect elements of the ABAWD determination that cannot be simulated with the variables present in the FSPQC data, including how the eligibility workers actually apply aspects of state policy that give them some discretion. In sum, the ABAWD status code appears to be most useful in identifying participants who are subject to the time limit and, among these participants, those who are meeting the work requirement.

To determine how we might best use the FSPQC data to fill in the missing counts, we compared the estimates reported by the states with those obtained (for the same states) from FSPQC data for FY00. We had to do this for different subsets of states because, as we have



noted, the alternative methods of estimating the ABAWD population with FSPQC data are better suited to estimating somewhat different segments of the ABAWD population.

Table B.2 compares the state reports and the FSPQC simulations of the total number of ABAWD participants in the 36 states that provided such estimates. The FSPQC estimates are average monthly values for the fiscal year, with a midpoint corresponding to the end of March 2000, which is also the approximate date of the estimates reported by the states. (Generally, the state reports represent end-of-month values.)

Over the 36 states, the total number of simulated ABAWD participants is less than three-quarters of the number reported by the states. We note, however, that four states with exceptionally large discrepancies—Kentucky, North Carolina, Tennessee, and Texas—account for nearly all of the difference of 119,000 participants. Furthermore, if we exclude these four states, we find that half of the remaining 32 states have *more* reported participants than simulated participants and half have fewer. This suggests that, on average, the state reports and the simulations are measuring the same thing, but there is considerable variability between the two. While this is not a formal test of difference, since it assumes no random error in the state report, the estimated standard errors for the simulations suggest that in most states there is a statistically significant difference between the simulated number and the reported number of ABAWD participants.

There are good reasons why we would favor the state reports over the simulations, in general. First, the state reports have no sampling error whereas the simulations are often based on very few observations in a given state. Second, the state reports presumably tell us how many participants the states have actually defined as ABAWDs whereas the simulations represent how many participants the states *should have* defined as ABAWDs, given the characteristics captured in the FSPQC data and those aspects of state policy that we can replicate. But the discrepancies raise questions about the state reports, certainly. The simulations use much of the same

information that states would be using to identify ABAWDs. Furthermore, if there is an overall bias in the simulations, we would expect the simulations to overstate the number of ABAWDs—more so in some states than others.<sup>2</sup> Yet, when we exclude four states with far *more* reported than simulated ABAWDs, as we have seen, the state reports and the simulations are roughly equal on average. This implies that an upward bias in the simulations is not the principal source of the discrepancies.

To compare the state reports with estimates based on the ABAWD code, we first restrict our attention to nonwaived areas. Table B.3 compares the state reports with two alternative estimates from the FSPQC data: (1) simulated ABAWDs residing in nonwaived counties and (2) participants with ABAWD status codes of 4 through 7 plus the state's report of 15 percent exemptions used in March 2000. The comparison includes 37 states that provided estimates of the number of ABAWD participants in nonwaived areas (we excluded two states as noted in the table). Some counties are only partially waived from the ABAWD provisions, and in these counties we cannot determine whether a simulated ABAWD is in the waived or nonwaived portion. For the three-way comparison we excluded states with partially waived counties, leaving 23 states. In the final two columns of the table we add the 14 states with partially waived counties, but we limit the comparison to the state reports and the estimates based on the ABAWD code.

When summed over the 23 states the simulated number of ABAWDs is less than three-quarters of the number reported by the states, and the number based on the ABAWD code is not much more than half the number reported by the states. If we restrict the estimates based on the

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<sup>2</sup> States may have additional criteria for determining unfitness for employment that do not show up in the work registration exemption and disability benefits that we used to identify such persons in the simulation.

ABAWD code to participants in nonwaived counties (column 4), the number drops slightly.<sup>3</sup> There are only six states in which the estimate based on the ABAWD code is higher than the number reported by the state and seven states in which the estimate based on the simulation is higher than the state report. Unlike Table B.2, then, the aggregate differences between the state reports and the estimates based on the FSPQC data cannot be attributed to a few outliers.

When we expand the comparison to include states with partially waived areas, which limits the comparison to the estimates based on the ABAWD code, the similarity of the two sets of estimates increases somewhat.<sup>4</sup> Summed over the 37 states the estimate based on the ABAWD code approaches two-thirds of the aggregate number reported by the states, and in 12 states the estimate based on the ABAWD code is higher than the state report. But, clearly, the ABAWD code yields smaller estimates of ABAWDs in nonwaived areas than the states' own reports.

Table B.4 compares the state reports with alternative estimates of ABAWD participants in waived areas. Again, if we exclude states with partial waivers we can estimate the number of simulated ABAWDs in waived areas. We also include in this comparison a separate estimate based on participants with ABAWD codes of 1 (ABAWD in a waived area) and living in waived counties. The three-way comparison is based on 12 states. Summed over the 12 states, the number of simulated participants is less than one-fourth the reported number while the estimate based on ABAWD code 1 is just under half the state report. Here, however, two outliers—Tennessee and Texas—account for most of the aggregate difference. Furthermore, a comparison of the individual state estimates shows that in most states the state report and the estimate based

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<sup>3</sup> This restriction should not be necessary because the ABAWD code takes waiver status into account. The slight discrepancy could be due to errors in the assignment of the ABAWD code. It could also be due to counties that were waived later or earlier in FY00 but not March 2000. The FSPQC data are drawn from the entire year, but our assignment of waiver status to counties reflects March 2000.

<sup>4</sup> We included in the FSPQC estimate those participants in partially waived counties but excluded those in fully waived counties.

on ABAWD code 1 are actually rather similar. Extending the comparison to include states with partial waivers strengthens this assessment. Kentucky, Tennessee, and Texas account for nearly all of the aggregate difference between the state reports and the estimates based on ABAWD code 1. Further, while the state report is still more likely to be above than below the estimate based on the ABAWD code, the latter appears to provide a reasonable proxy for the state report.

On the basis of these comparisons, we decided to impute the missing counts as follows. For nonwaived areas, we assigned to each missing count the FSPQC estimate based on ABAWD codes 4 through 7 plus the number of 15 percent exemptions reported to FNS on form FNS 583. We excluded participants in fully waived counties but not in partially waived counties. Unlike the simulation, the ABAWD status code allows us to identify nonwaived ABAWDs in partially waived counties. We imputed waived areas differently, depending on whether the state reported a count of ABAWDs in nonwaived areas. For waived areas in the seven states that reported counts of ABAWDs in nonwaived areas, we first attempted to impute the number of ABAWDs in waived areas by subtracting the reported count of nonwaived ABAWDs from the estimate of total ABAWDs based on simulation. This was successful in three states, but in the other four it produced estimates that were either negative or too high relative to the count of nonwaived ABAWDs. In these four states we imputed the FSPQC estimate based on individuals 18 to 50 who had ABAWD status code 1 and lived in counties that were fully waived or partially waived.<sup>5</sup> Again, this use of code 1 allowed us to separate waived from nonwaived ABAWDs in partially waived counties. For waived areas in states that did *not* report counts of ABAWDs in nonwaived areas, we substituted the number of simulated ABAWDs who were living in fully

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<sup>5</sup> If the waived area in a partially waived county was an Indian reservation, we counted just those participants (18 to 50 with ABAWD code 1) who were Native Americans.

waived counties or who were Native Americans living in counties with waived Indian reservations. Except for two states, an alternative imputation using ABAWD code 1 would have yielded very similar results. We actually favored that approach until seeing that the estimate based on code 1 in one state was implausibly high. In the other state, however, we felt that the estimate based on the simulation was too low, and we made an exception to base this one state on code 1.

In addition to the 25 missing counts we also imputed substitute counts for ABAWDs in waived areas in Kentucky and Maine, nonwaived areas in North Carolina, and both waived and nonwaived areas in Tennessee.<sup>6, 7</sup> In doing so we followed the procedures described above except that in waived areas in Tennessee we substituted an estimate based on ABAWD code 1, which was more consistent with the total number of adults (18 to 50) in waived areas. For Alaska and Georgia, which reported the total number of ABAWDs but could not disaggregate them, we divided the state counts into waived and nonwaived areas based on additional information that the states provided rather than FSPQC data.

The imputed numbers are reported in Table B.5. The final estimates of ABAWD participants in waived and nonwaived areas, including both reported and imputed values, are presented in Table B.6.

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<sup>6</sup> We consulted with all four states. Maine and North Carolina confirmed that the reported numbers in question represented a broader population than we were intending. Kentucky and Tennessee, on the other hand, could not see anything in their estimation procedures that would have produced excessively high numbers. Nevertheless, the reported numbers fell so far outside the plausible range that we elected to substitute alternative numbers anyway.

<sup>7</sup> We retained the reported counts for Texas, despite the fact that they were much higher than the simulations (Table B.1), because the frequency of ABAWD participants relative to all participants 18 to 50, broken down by waiver status, approximated the national average.

## **B. NUMBER OF ABAWDS MEETING THE WORK REQUIREMENT**

More than half of the states (29) reported to us the percentage of ABAWDs subject to the time limit who were meeting the work requirement. Table B.7 presents for each of these states the reported percentage meeting the work requirement in March 2000 and two alternative estimates for FY00 developed from the FSPQC data. The first of these is based entirely on the ABAWD status code while the second (constructed code) is based on measures of employment activity (which includes E&T) and workfare participation. The estimates based on these alternatives differ from each other rather considerably, but there is no consistent pattern. Each is occasionally very close to the number reported by the state, but often the discrepancy is considerable.

States are required to report to FNS each quarter the number of workfare slots and education and training slots filled by ABAWDs and qualifying for federal reimbursement in each of the preceding three months. Slots are reported separately for waived and nonwaived areas. For states that did not report the percentage of their ABAWDs who were meeting the work requirement, the quarterly reports to FNS are a potential source of counts of ABAWDs who were meeting the work requirement by participating in workfare or education and training.

The first four columns of Table B.8 shows what states provided us with respect to counts of ABAWDs participating in workfare, as well as education and training, plus the counts reported on Form FNS 583 for the same month. We expected that the counts states reported to us would occasionally exceed what they reported on Form 583 because states might have slots that were not federally funded. The states might also interpret our request differently from Form 583. Table B.8 shows the following. The total count of workfare participants over the 19 states is virtually identical between the state reports and Form FNS 583. The remains true even if we exclude California, which accounts for more than 80 percent of the total. But while the totals agree, there are sizable differences for about half the states—reflecting a pattern that has become

familiar. For education and training, the sum of state reports of participants is nearly 50 percent higher than the Form 583 total and would be nearly twice as high without California. At the state level, however, the two reports are more similar, with only four states accounting for most of the aggregate difference.

Table B.8 also includes two pairs of estimates from the FSPQC data, based on the constructed code described earlier. The first pair of estimates reflects the incidence of workfare and of employment and training activities other than workfare among FSP participants with ABAWD codes of 4 through 7. Part of the difference between the FSPQC estimates and those reported by the state may be due to the fact that the (weighted) number of participants with codes 4 through 7 differs from and generally understates the reported number of participants subject to the time limit. The second pair of estimates represents an attempt to adjust for this difference—specifically, by multiplying the first pair of estimates by the ratio of two quantities in each state: (1) the reported or imputed number of participants subject to the time limit and (2) the number of participants with codes 4 through 7. For example, in Colorado the reported number of participants subject to the time limit is slightly lower than the estimate based on ABAWD codes 4 through 7, so the adjusted workfare and education and training estimates are slightly lower than the unadjusted estimates. In Florida, however, the reported number of participants subject to the limit is only 40 percent of the number estimated from ABAWD codes 4 through 7, so the adjusted estimates of workfare and education and training participants are 40 percent of the unadjusted estimates.

Summed over the 19 states, both of the FSPQC estimates of ABAWD workfare participants are considerably lower than the number reported by the states. This is due entirely to California, however. If we exclude California, the FSPQC estimates of workfare participants are actually higher than the numbers reported by the states. But there are very few states in which either estimate from the FSPQC is very close to what the state reported. With respect to education and

training, the two FSPQC estimates exceed the state reports by a considerable margin. Removing California increases the discrepancy. Over the remaining 18 states the sum of either set of FSPQC estimates is more than two-and-a-half times the sum of the state reports. As with the workfare estimates, there are very few states for which the state reports and the FSPQC estimates are remotely close. Unlike workfare, which meets the ABAWD work requirement almost by definition, the education and training activities captured in the FSPQC may include many that do not meet the work requirement—such as job search—or that fall short of the minimum 20 hours per week.<sup>8</sup>

Based on these findings and certain additional considerations, we elected to use the Form 583 data to impute the number of ABAWD participants meeting the work requirement through workfare or education and training. These additional considerations included the absence of sampling error in the Form 583 numbers, their monthly frequency (giving us figures for March 2000), and their status as official state reports.

When a state did not report the number of ABAWD participants who were meeting the work requirement or did not provide a complete breakdown of the way in which participants were meeting the work requirement, we did the following to impute the missing information. First, if a state did not report participation in workfare or education and training, we used the state's submission on Form FNS 583 for March 2000 to obtain counts of ABAWDs in nonwaived areas who were participating in workfare or education and training. We directly substituted the Form

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<sup>8</sup> The FSPQC data may also include other work activities that do not qualify as workfare or education and training but that may nevertheless meet the ABAWD work requirement—such as the self-initiated community service by which many ABAWDs met the work requirement in Michigan. However, only in Michigan and Indiana, among states reporting how ABAWDs met the work requirement, did such activities account for a significant proportion of all qualifying activities.



583 numbers for the missing items.<sup>9</sup> Second, if a state reported the total number of participants meeting the work requirement but not the breakdown, which happened very rarely, we subtracted from this figure the number participating in workfare or education and training, as imputed in the first step. Third, if a state did not report the total number of participants meeting the work requirement, we estimated from FSPQC data the number who were meeting the work requirement by working. Specifically, we determined the proportion of ABAWDs subject to the time limit who were working at least 20 hours per week, and we multiplied this percentage by the reported or imputed number of participants subject to the time limit. We compared this estimate to an alternative estimate calculated by subtracting the reported or imputed numbers meeting the work requirement through methods other than work from an FSPQC-based estimate of the total number meeting the work requirement, and we took the smaller of the two—but not less than zero.<sup>10</sup> This gave us the imputed *number* meeting the work requirement by working, which we then added to the reported or imputed numbers meeting the work requirement through workfare or education and training to obtain the imputed, total number meeting the work requirement.<sup>11</sup>

The results of these imputations are presented in Table B.9. Final estimates combining the reported and imputed values are presented in Table B.10.

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<sup>9</sup> We encountered one case in which the number of participants reported on Form 583 for education and training exceeded the state’s estimated number of ABAWDs in nonwaived areas. We determined in conversations with the state that the allocation of E&T participants between waived and nonwaived areas was the likely source of the problem, and we adjusted the estimates of workfare and education and training participants to be consistent with the number of ABAWD participants and the very high proportion of ABAWDs who were estimated to be meeting the work requirement in the FSPQC data.

<sup>10</sup> We were concerned that in combining FSPQC estimates of employment with state reports of workfare and education and training participation, there existed a potential to overstate the total number of participants meeting the work requirement. This two-step approach limits the impact of sampling error and certain kinds of nonsampling error on the estimate of the number meeting the work requirement by working.

<sup>11</sup> The state reports suggested that very few participants met the work requirement through activities other than these three and gave us little basis for imputing such activities, so we did not attempt to do so. This may result in our understating by a small margin the overall proportion meeting the work requirement.

### **C. CHARACTERISTICS OF ABAWD PARTICIPANTS**

States were less likely to provide tabulations of the characteristics of ABAWD participants and their households than they were to provide estimates of the percentage of participants who were meeting the work requirement. As a result, we had to rely more heavily on FSPQC data than we did for the basic counts of ABAWDs. We also used FSPQC data to prepare tabulations of information that was not requested from the states—namely, the characteristics of all participants 18 to 50. Chapter II includes two sets of national-level comparisons with respect to the characteristics of ABAWD participants: (1) a comparison of ABAWDs subject to the time limit with all participants 18 to 50 and (2) a comparison of ABAWD participants who were meeting the work requirement with those who were subject to the time limit but not meeting the work requirement.

For both sets of comparisons we created national estimates of the characteristics of ABAWD participants who were subject to the time limit by combining the tabulations reported by the states with estimates that were constructed from FY00 FSPQC data for the remaining states. In constructing the combined estimates for a given characteristic, we first tabulated the FSPQC data for just those states that did not provide counts for that characteristic. As a rule, the FSPQC tabulation accounted for fewer ABAWDs across the set of states than did our separate estimates of ABAWDs in those states. Before combining the tabulations from the two sources to create national estimates, therefore, we ratio-adjusted the FSPQC tabulation so that it summed to the desired number of ABAWDs (which, depending on the tabulation, was the number subject to the time limit, the number meeting the work requirement, or the number not meeting the work requirement). We then added the adjusted FSPQC tabulation, cell by cell, to the corresponding tabulation constructed from the counts provided by the states. For example, in tabulating the number of ABAWDs subject to the time limit by age and sex, we estimated from the FSPQC data that there were 95,000 such ABAWDs in the states that supplied no counts. From Table

II.11 we estimated that there were 115,000 such ABAWDs, or about 20,000 more than the FSPQC estimate. We increased each cell of the FSPQC table by about 20 percent so that the FSPQC table summed to 115,000. We added this adjusted tabulation to the tabulation of state counts, and the resulting table summed to 216,000, the number of ABAWDs subject to the time limit, as reported in Table II.11.

We could have applied the ratio adjustment differently, by separately adjusting each state's FSPQC tabulation to match the estimated number of ABAWDs in that state. We elected not to do this because the sampling error in the state-level FSPQC tabulations of ABAWDs is very high. Applying state-specific adjustments would have resulted in the largest adjustments being applied to the states with the weakest ABAWD sample data and the smallest adjustments being applied to the states with the strongest ABAWD sample data. This would have increased the sampling error in the national estimates relative to the procedure that we employed.

For states that reported tabulations, we compared the estimates across the set of such states with the estimates that we generated from FSPQC data. While the FSPQC data for these states were not used in creating the national estimates, this comparison allowed us to confirm that the FSPQC data were roughly consistent with the state tabulations.

TABLE B.1

## STATE REPORTS OF ABAWD PARTICIPANT COUNTS, MARCH 2000

	Number of ABAWD Participants		
	Total	In Waived Areas	In Nonwaived Areas
Alabama	4,241	1,939	2,302
Alaska	1,440		
Arizona			7,269
Arkansas			
California	55,614	0	55,614
Colorado	2,058	274	1,784
Connecticut			
Delaware		0	
District of Columbia			0
Florida	8,993	6,605	2,388
Georgia	10,405		
Hawaii			1,384
Idaho			276
Illinois	34,422	29,851	4,571
Indiana	2,518	701	1,817
Iowa	1,388	0	1,388
Kansas	2,611	0	2,611
Kentucky	40,657	37,293	3,364
Louisiana	15,210	13,008	2,202
Maine	4,142	3,878	264
Maryland	5,551	4,222	1,329
Massachusetts		0	
Michigan	16,644	0	16,644
Minnesota	5,822	1,438	4,384
Mississippi	1,460	0	1,460
Missouri			
Montana			
Nebraska			
Nevada	999	216	783
New Hampshire		0	
New Jersey	8,208	6,675	1,533
New Mexico	2,564	1,491	1,073
New York	28,029	2,121	25,908
North Carolina	32,658	0	32,658
North Dakota			404
Ohio	10,844	0	10,844
Oklahoma	4,081	0	4,081
Oregon	8,303	0	8,303
Pennsylvania	33,176	29,177	3,999
Rhode Island	1,769	1,483	286
South Carolina	4,173	1,641	2,532
South Dakota	1,279	879	400
Tennessee	40,987	26,581	14,406
Texas	35,531	19,096	16,435
Utah			
Vermont	1,628	246	1,382
Virginia	12,761	4,960	7,801
Washington			3,975
W. Virginia	7,668	6,681	987
Wisconsin	2,225	0	2,225
Wyoming	557	85	472
Number of Counts Requested	51	38	50
Number of Counts Provided	36	24	39

SOURCE: Mathematica Policy Research, Inc., from data supplied by the states.

TABLE B.2

COMPARISON OF TOTAL ABAWD PARTICIPANTS AS REPORTED  
BY STATES AND SIMULATED WITH FY00 QC DATA

State	Reported ABAWD Participants March 2000	Simulated ABAWD Participants FY00	Approximate Standard Error of Simulation	Difference Divided by Approximate Standard Error of Simulation
Total	450,616	331,461	--	--
Alabama	4,241	4,704	849	0.55
Alaska	1,440	4,129	421	6.39
Arizona				
Arkansas				
California	55,614	43,485	5,753	-2.11
Colorado	2,058	1,590	341	-1.37
Connecticut				
Delaware				
District of Columbia				
Florida	8,993	18,045	2,509	3.61
Georgia	10,405	10,652	1,608	0.15
Hawaii				
Idaho				
Illinois	34,422	39,021	3,113	1.48
Indiana	2,518	4,173	721	2.29
Iowa	1,388	1,974	323	1.81
Kansas	2,611	1,879	321	-2.28
Kentucky	40,657	13,693	1,434	-18.80
Louisiana	15,210	16,748	1,741	0.88
Maine	4,142	1,957	367	-5.95
Maryland	5,551	3,005	543	-4.69
Massachusetts				
Michigan	16,644	10,944	1,411	-4.04
Minnesota	5,822	3,153	558	-4.78
Mississippi	1,460	3,098	557	2.94
Missouri				
Montana				
Nebraska				
Nevada	999	1,204	266	0.77
New Hampshire				
New Jersey	8,208	8,405	1,088	0.18
New Mexico	2,564	3,681	428	2.61
New York	28,029	49,996	6,218	3.53
North Carolina	32,658	3,582	830	-35.03
North Dakota				
Ohio	10,844	7,411	1,429	-2.40
Oklahoma	4,081	2,638	496	-2.91
Oregon	8,303	7,523	918	-0.85
Pennsylvania	33,176	18,011	2,510	-6.04
Rhode Island	1,769	7,051	588	8.98
South Carolina	4,173	5,113	752	1.25
South Dakota	1,279	838	204	-2.16
Tennessee	40,987	4,274	1,051	-34.93
Texas	35,531	12,408	2,238	-10.33
Utah				
Vermont	1,628	210	109	-13.01
Virginia	12,761	4,978	889	-8.75
Washington				
W. Virginia	7,668	7,387	830	-0.34
Wisconsin	2,225	4,129	505	3.77
Wyoming	557	373	107	-1.72

SOURCE: Counts reported by states and FY00 FSPQC sample data.

TABLE B.3

ABAWD PARTICIPANTS IN NONWAIVED AREAS: COMPARISON OF  
STATE REPORTS AND QC SAMPLE-BASED ESTIMATES

State	Excluding States with Partial Waivers				No Exclusion	
	Reported ABAWD Participants	Simulated Nonwaived ABAWD Participants	All Code 4-7 ABAWD Participants +15% Exempt	Nonwaived Code 4-7 ABAWD Participants +15% Exempt	Reported ABAWD Participants	Nonwaived Code 4-7 ABAWD Participants +15% Exempt
Total	158,584	112,492	91,229	88,355	192,972	122,220
Alabama	2,302	2,946	1,493	1,196	2,302	1,196
Alaska						
Arizona					7,269	883
Arkansas						
California	55,614	43,485	28,184	28,184	55,614	28,184
Colorado	1,784	1,590	1,900	1,900	1,784	1,900
Connecticut						
Delaware						
District of Columbia						
Florida					2,388	3,196
Georgia						
Hawaii	1,384	1,653	1,250	1,250	1,384	1,250
Idaho	276	445	568	568	276	568
Illinois					4,571	8,482
Indiana					1,817	2,042
Iowa	1,388	1,974	871	871	1,388	871
Kansas	2,611	1,879	2,216	2,216	2,611	2,216
Kentucky					3,364	3,800
Louisiana					2,202	1,978
Maine					264	942
Maryland					1,329	353
Massachusetts	0	0	0	0	0	0
Michigan	16,644	10,944	10,473	10,473	16,644	10,473
Minnesota	4,384	2,971	1,822	1,725	4,384	1,725
Mississippi	1,460	3,098	4,905	4,905	1,460	4,905
Missouri						
Montana						
Nebraska						
Nevada	783	386	1,266	452	783	1,266
New Hampshire						
New Jersey					1,533	1,581
New Mexico	1,073	1,227	1,416	569	1,073	849
New York						
North Carolina						
North Dakota					404	189
Ohio	10,844	7,411	5,828	5,828	10,844	5,828
Oklahoma	4,081	2,638	720	720	4,081	720
Oregon	8,303	7,523	6,370	6,370	8,303	6,370
Pennsylvania					3,999	5,999
Rhode Island					286	54
South Carolina	2,532	2,497	2,126	2,021	2,532	2,021
South Dakota	400	140	383	383	400	383
Tennessee	14,406	2,924	3,447	3,447	14,406	3,447
Texas	16,435	9,817	9,387	8,990	16,435	8,990
Utah						
Vermont	1,382	210	695	695	1,382	695
Virginia	7,801	2,318	1,699	1,381	7,801	1,381
Washington					3,975	3,064
West Virginia					987	209
Wisconsin	2,225	4,129	4,128	4,128	2,225	4,128
Wyoming	472	286	83	83	472	83

SOURCE: Counts reported by states and FY00 FSPQC sample data.

NOTE: New York and North Carolina are not included in this table. New York City is incorrectly coded as waived in the FSPQC data, and the reported counts for North Carolina represent a broader universe than just ABAWDs. In addition, in the final column we excluded fully waived counties but not partially waived counties.

TABLE B.4

ABAWD PARTICIPANTS IN WAIVED AREAS: COMPARISON OF STATE REPORTS  
AND QC SAMPLE-BASED ESTIMATES

State	Excluding States with Partial Waivers			No Exclusion	
	Reported ABAWD Participants	Simulated Waived ABAWD Participants	Code 1 ABAWD Participants In Waived Areas	Reported ABAWD Participants	Code 1 ABAWD Participants In Waived Areas
Total	58,846	13,934	28,341	200,541	133,823
Alabama	1,939	1,758	1,900	1,939	1,900
Alaska					
Arizona					
Arkansas					
California					
Colorado	274	0	0	274	0
Connecticut				0	0
Delaware					
District of Columbia					
Florida				6,605	15,212
Georgia					
Hawaii					
Idaho					
Illinois				29,851	31,169
Indiana				701	1,397
Iowa					
Kansas					
Kentucky				37,293	2,149
Louisiana				13,008	19,212
Maine				3,878	455
Maryland				4,222	0
Massachusetts					
Michigan					
Minnesota	1,438	182	0	1,438	0
Mississippi					
Missouri					
Montana					
Nebraska					
Nevada	216	52	160	216	160
New Hampshire					
New Jersey				6,675	13,790
New Mexico	1,491	2,126	893	1,491	893
New York				2,121	759
North Carolina					
North Dakota					
Ohio					
Oklahoma					
Oregon					
Pennsylvania				29,177	20,493
Rhode Island				1,483	670
South Carolina	1,641	2,616	5,142	1,641	5,142
South Dakota	879	599	468	879	468
Tennessee	26,581	1,350	7,087	26,581	7,087
Texas	19,096	2,591	6,954	19,096	6,954
Utah					
Vermont	246	0	0	246	0
Virginia	4,960	2,660	5,619	4,960	5,619
Washington				0	0
W. Virginia				6,681	178
Wisconsin					
Wyoming	85	0	116	85	116

SOURCE: Counts reported by states and FY00 FSPQC sample data.

TABLE B.5

## QC SAMPLE-BASED IMPUTATION OF ABAWD PARTICIPANT COUNTS

State	Number of ABAWD Participants		
	Total	In Waived Areas	In Nonwaived Areas
Total	73,413	49,147	24,266
Alabama	0	0	0
Alaska	0	0	0
Arizona	6,137	6,137	0
Arkansas	9,562	6,322	3,240
California	0	0	0
Colorado	0	0	0
Connecticut	8,073	7,228	845
Delaware	672	0	672
District of Columbia	6,907	6,907	0
Florida	0	0	0
Georgia	0	0	0
Hawaii	1,305	1,305	0
Idaho	0	0	0
Illinois	0	0	0
Indiana	0	0	0
Iowa	0	0	0
Kansas	0	0	0
Kentucky	10,329	10,329	0
Louisiana	0	0	0
Maine	455	455	0
Maryland	0	0	0
Massachusetts	2,469	0	2,469
Michigan	0	0	0
Minnesota	0	0	0
Mississippi	0	0	0
Missouri	5,981	1,487	4,494
Montana	1,266	685	581
Nebraska	825	40	785
Nevada	0	0	0
New Hampshire	94	0	94
New Jersey	0	0	0
New Mexico	0	0	0
New York	0	0	0
North Carolina	6,681	0	6,681
North Dakota	193	193	0
Ohio	0	0	0
Oklahoma	0	0	0
Oregon	0	0	0
Pennsylvania	0	0	0
Rhode Island	0	0	0
South Carolina	0	0	0
South Dakota	0	0	0
Tennessee	10,534	7,087	3,447
Texas	0	0	0
Utah	1,014	56	958
Vermont	0	0	0
Virginia	0	0	0
Washington	916	916	0
W. Virginia	0	0	0
Wisconsin	0	0	0
Wyoming	0	0	0

SOURCE: Mathematica Policy Research, Inc., from FY00 FSPQC sample data.



TABLE B.6

## REPORTED PLUS IMPUTED ABAWD PARTICIPANT COUNTS, MARCH 2000

State	Number of ABAWD Participants		
	Total	In Waived Areas	In Nonwaived Areas
Total	422,521	190,536	231,985
Alabama	4,241	1,939	2,302
Alaska	1,440	860	580
Arizona	13,406	6,137	7,269
Arkansas	9,562	6,322	3,240
California	55,614	0	55,614
Colorado	2,058	274	1,784
Connecticut	8,073	7,228	845
Delaware	672	0	672
District of Columbia	6,907	6,907	0
Florida	8,993	6,605	2,388
Georgia	10,405	7,740	2,665
Hawaii	2,689	1,305	1,384
Idaho	276	0	276
Illinois	34,422	29,851	4,571
Indiana	2,518	701	1,817
Iowa	1,388	0	1,388
Kansas	2,611	0	2,611
Kentucky	13,693	10,329	3,364
Louisiana	15,210	13,008	2,202
Maine	719	455	264
Maryland	5,551	4,222	1,329
Massachusetts	2,469	0	2,469
Michigan	16,644	0	16,644
Minnesota	5,822	1,438	4,384
Mississippi	1,460	0	1,460
Missouri	5,981	1,487	4,494
Montana	1,266	685	581
Nebraska	825	40	785
Nevada	999	216	783
New Hampshire	94	0	94
New Jersey	8,208	6,675	1,533
New Mexico	2,564	1,491	1,073
New York	28,029	2,121	25,908
North Carolina	6,681	0	6,681
North Dakota	597	193	404
Ohio	10,844	0	10,844
Oklahoma	4,081	0	4,081
Oregon	8,303	0	8,303
Pennsylvania	33,176	29,177	3,999
Rhode Island	1,769	1,483	286
South Carolina	4,173	1,641	2,532
South Dakota	1,279	879	400
Tennessee	10,534	7,087	3,447
Texas	35,531	19,096	16,435
Utah	1,014	56	958
Vermont	1,628	246	1,382
Virginia	12,761	4,960	7,801
Washington	4,891	916	3,975
W. Virginia	7,668	6,681	987
Wisconsin	2,225	0	2,225
Wyoming	557	85	472

SOURCE: Mathematica Policy Research, Inc., from counts supplied by the states and supplemental counts imputed with FSPQC sample data.

TABLE B.7

STATE REPORT AND ALTERNATIVE QC SAMPLE ESTIMATES  
OF PROPORTION MEETING THE WORK REQUIREMENT  
AMONG ABAWD PARTICIPANTS SUBJECT TO TIME LIMIT

State	States Providing Estimates			States Not Providing Estimates	
	State Report	ABAWD Code	Constructed Code	ABAWD Code	Constructed Code
Alabama				9.3%	60.7%
Alaska	41.5%	41.5%	21.8%		
Arizona	51.7%	0.0%	25.1%		
Arkansas				82.8%	23.8%
California				43.6%	65.6%
Colorado	42.8%	43.3%	33.0%		
Connecticut				68.7%	33.2%
Delaware				13.0%	26.2%
District of Columbia					
Florida				41.6%	57.9%
Georgia				69.6%	58.4%
Hawaii	17.9%	40.0%	35.3%		
Idaho	29.6%	30.0%	39.0%		
Illinois				87.4%	57.0%
Indiana	21.6%	19.0%	25.0%		
Iowa				23.4%	29.3%
Kansas	20.4%	29.4%	20.5%		
Kentucky	48.1%	38.2%	10.9%		
Louisiana				56.6%	29.1%
Maine	21.6%	35.8%	14.2%		
Maryland	0.5%	37.0%	0.0%		
Massachusetts				35.2%	61.8%
Michigan	20.8%	34.4%	34.1%		
Minnesota				28.0%	22.1%
Mississippi	100.0%	65.5%	37.0%		
Missouri				69.4%	15.2%
Montana				33.5%	39.8%
Nebraska				29.5%	28.5%
Nevada	3.7%	30.6%	86.7%		
New Hampshire				0.0%	0.0%
New Jersey				100.0%	90.4%
New Mexico	1.6%	76.4%	73.2%		
New York				76.4%	61.6%
North Carolina				14.6%	40.8%
North Dakota	40.1%	46.8%	43.4%		
Ohio	11.0%	23.0%	32.1%		
Oklahoma	4.0%	25.2%	37.8%		
Oregon	94.6%	55.2%	44.5%		
Pennsylvania	13.6%	61.1%	51.0%		
Rhode Island	25.0%	0.0%	100.0%		
South Carolina	55.0%	42.7%	0.0%		
South Dakota	44.8%	75.5%	49.0%		
Tennessee	59.1%	30.4%	29.0%		
Texas	52.8%	20.9%	5.7%		
Utah				27.4%	38.9%
Vermont	32.1%	53.3%	15.4%		
Virginia	55.9%	28.0%	27.5%		
Washington	24.9%	11.1%	22.3%		
W. Virginia				50.4%	49.3%
Wisconsin	32.4%	37.1%	50.5%		
Wyoming	55.5%	35.9%	68.8%		

SOURCE: Counts provided by the states and supplemental estimates prepared by Mathematica Policy Research, Inc., from FY00 FSPQC sample data.

NOTE: The percentage based on the ABAWD code equals the number of participants with ABAWD code equal to 7 divided by the number with ABAWD codes 4 through 7. The constructed code is based on the same universe but uses employment status and workfare status fields to determine if the participant is working 20 or more hours per week, participating in workfare, or participating in another E&T activity.

TABLE B.8

ABAWD PARTICIPANTS IN WORKFARE AND EDUCATION AND TRAINING AS REPORTED IN  
STATE TABULATIONS, FORM FNS 583, AND FSPQC DATA

	State Report		Form FNS 583		FSPQC Constructed Code		Adjusted FSPQC Constructed Code	
	Workfare	Education and Training	Workfare	Education and Training	Workfare	Education and Training	Workfare	Education and Training
U.S. Total	26,794	5,034	26,909	3,547	11,302	8,178	18,493	8,214
Without California	4,545	3,178	4,676	1,692	5,272	8,178	6,542	8,214
Alabama								
Alaska								
Arizona	203	0	23	2	161	0	1,763	0
Arkansas								
California	22,249	1,856	22,233	1,855	6,029	0	11,951	0
Colorado	497	181	652	208	74	305	70	285
Connecticut								
Delaware								
District of Columbia								
Florida	111	33	111	33	1,062	349	420	138
Georgia								
Hawaii								
Idaho	63	1	0	0	0	48	0	20
Illinois								
Indiana	0	169	82	140	0	253	0	225
Iowa								
Kansas								
Kentucky	0	563	217	0	341	0	293	0
Louisiana								
Maine	6	1	7	2	63	0	16	0
Maryland								
Massachusetts								
Michigan	0	737	180	0	0	1,966	0	3,124
Minnesota								
Mississippi	997	0	551	29	190	1,012	48	255
Missouri								
Montana								
Nebraska								
Nevada	3	24	0	0	0	1,033	0	636
New Hampshire								
New Jersey								
New Mexico	0	7	0	7	469	47	355	36
New York								
North Carolina								
North Dakota								
Ohio	517	250	1,414	122	1,059	0	1,971	0
Oklahoma								
Oregon	923	0	298	23	783	932	1,029	1,225
Pennsylvania	0	51	0	389	0	1,135	0	703
Rhode Island								
South Carolina	142	1,001	121	586	0	0	0	0
South Dakota								
Tennessee								
Texas								
Utah								
Vermont								
Virginia	34	19	34	19	0	150	0	689
Washington	769	10	589	2	0	567	0	671
W. Virginia								
Wisconsin	280	131	397	130	1,070	383	577	207
Wyoming								

SOURCE: Counts provided by the states, Form FNS 583, and FSPQC data.

TABLE B.9

## IMPUTATION RESULTS FOR WAY OF MEETING THE WORK REQUIREMENT

State	Working	Workfare	Education and Training
U.S. Total	38,173	23,597	2,708
Alabama	453	553	0
Alaska	179	59	0
Arizona			
Arkansas			
California	12,203		
Colorado			
Connecticut	78	15	30
Delaware	132	2	0
District of Columbia			
Florida	419		
Georgia	766	172	25
Hawaii	243	0	5
Idaho	20		
Illinois			
Indiana			
Iowa	407	0	0
Kansas			
Kentucky			
Louisiana	340	44	5
Maine			
Maryland			
Massachusetts	247	106	0
Michigan			
Minnesota	683	25	238
Mississippi			
Missouri	332	0	38
Montana	0	0	394
Nebraska	154	27	0
Nevada	35		
New Hampshire	0	40	6
New Jersey	399	157	716
New Mexico		0	
New York	1,548	21,500	800
North Carolina	1,593	38	28
North Dakota	160	0	2
Ohio			
Oklahoma			
Oregon	6,691		23
Pennsylvania			
Rhode Island			
South Carolina	0		
South Dakota	124	51	4
Tennessee	1,690	281	66
Texas	8,198	457	21
Utah	102	57	114
Vermont	422	13	9
Virginia			
Washington			
W. Virginia	307	0	170
Wisconsin			
Wyoming	248	0	14

SOURCE: Mathematica Policy Research, Inc., from FSPQC sample data for FY00 and Form FNS 583 data for March 2000.

TABLE B.10

REPORTED PLUS IMPUTED PARTICIPANTS WHO ARE SUBJECT TO THE TIME LIMIT  
AND MEETING THE WORK REQUIREMENT

State	Total	Working	Workfare	Education and Training	Other
U.S. Total	110,028	50,585	50,391	7,742	1,310
Alabama	1,006	453	553	0	0
Alaska	238	179	59	0	0
Arizona	3,677	3,474	203	0	0
Arkansas					
California	36,308	12,203	22,249	1,856	0
Colorado	730	52	497	181	0
Connecticut	123	78	15	30	0
Delaware	134	132	2	0	0
District of Columbia					
Florida	563	419	111	33	0
Georgia	963	766	172	25	0
Hawaii	248	243	0	5	0
Idaho	84	20	63	1	0
Illinois					
Indiana	390	152	0	169	69
Iowa	407	407	0	0	0
Kansas	443	443	0	0	0
Kentucky	1,295	732	0	563	0
Louisiana	389	340	44	5	0
Maine	48	41	6	1	0
Maryland	6	6	0	0	0
Massachusetts	353	247	106	0	0
Michigan	3,467	1,513	0	737	1,217
Minnesota	946	683	25	238	0
Mississippi	1,160	149	997	0	14
Missouri	370	332	0	38	0
Montana	394	0	0	394	0
Nebraska	181	154	27	0	0
Nevada	64	35	3	24	2
New Hampshire	46	0	40	6	0
New Jersey	1,272	399	157	716	0
New Mexico	17	10	0	7	0
New York	23,848	1,548	21,500	800	0
North Carolina	1,659	1,593	38	28	0
North Dakota	162	160	0	2	0
Ohio	1,194	427	517	250	0
Oklahoma	163	163	0	0	0
Oregon	7,637	6,691	923	23	0
Pennsylvania	515	464	0	51	0
Rhode Island	61	61	0	0	0
South Carolina	1,143	0	142	1,001	0
South Dakota	179	124	51	4	0
Tennessee	2,037	1,690	281	66	0
Texas	8,676	8,198	457	21	0
Utah	273	102	57	114	0
Vermont	444	422	13	9	0
Virginia	4,358	4,305	34	19	0
Washington	897	118	769	10	0
W. Virginia	477	307	0	170	0
Wisconsin	721	302	280	131	8
Wyoming	262	248	0	14	0

SOURCE: Mathematica Policy Research, Inc., from FSPQC sample data for FY00 and Form FNS 583 data for March 2000.

**APPENDIX C**

**STATE POLICIES ON DEFINING WHO IS SUBJECT TO THE ABAWD TIME LIMIT**

TABLE C1  
EXEMPTION FOR PEOPLE OVER 50

State	Age Policy Uniform Across State?	Age At Which Adults Are Exempt
Alabama	Y	50
Alaska	Y	50
Arizona	Y	50
Arkansas	Y	50
California	Y	50
Colorado	Y	50
Connecticut	Y	51
Delaware	Y	50
District of Columbia	n.a.	n.a.
Florida	Y	50
Georgia	Y	50
Hawaii	Y	50
Idaho	Y	51
Illinois	Y	50
Indiana	Y	50
Iowa	Y	50
Kansas	Y	45 <sup>a</sup>
Kentucky	Y	50
Louisiana	Y	50
Maine	Y	50
Maryland	Y	47 <sup>a</sup>
Massachusetts	Y	51
Michigan	Y	50
Minnesota	Y	50
Mississippi	Y	50
Missouri	Y	50
Montana	Y	50
Nebraska	Y	50
Nevada	Y	50
New Hampshire	Y	51
New Jersey	Y	50
New Mexico	Y	50
New York	Y	50
North Carolina	Y	50
North Dakota	Y	50
Ohio	Y	50
Oklahoma	Y	51
Oregon	Y	50
Pennsylvania	Y	47 <sup>a</sup>
Rhode Island	Y	50
South Carolina	Y	50
South Dakota	Y	50
Tennessee	Y	50
Texas	Y	50
Utah	Y	50
Vermont	Y	50
Virginia	Y	50
Washington	Y	50
West Virginia	Y	48 <sup>a</sup>
Wisconsin	Y	50
Wyoming	Y	50

SOURCE: State Food Stamp Program Director Survey .

n.a. = Not applicable.

<sup>a</sup> State uses 15 percent exemption to lower age limit.

TABLE C2

## CONDITIONS FOR CERTIFYING MENTAL OR PHYSICAL UNFITNESS FOR EMPLOYMENT

State	Exempt If Client Meets FSP Disability Definition?	Specific State Form for Health Professionals Required	Verbal Statement from Health Professional Sufficient	Client's Self-Report of Disability Sufficient	Caseworker's Direct Observation Sufficient
Alabama	Y				✓
Alaska	Y		✓	✓	✓
Arizona	Y			✓	✓
Arkansas	Y		✓		
California	Y		<sup>a</sup>		<sup>a</sup>
Colorado	Y				✓
Connecticut	Y				
Delaware	Y		✓	✓	✓
District of Columbia	n.a.				
Florida	Y				✓
Georgia	Y			✓	✓
Hawaii	Y		✓	✓	✓
Idaho	Y				✓
Illinois	Y		✓	✓	✓
Indiana	Y	✓	✓		✓
Iowa	N				
Kansas	Y				
Kentucky	Y				✓
Louisiana	Y	✓	✓	✓	✓
Maine	Y			✓	✓
Maryland	Y				✓
Massachusetts	Y	✓			✓
Michigan	N			✓	✓
Minnesota	Y				
Mississippi	Y		✓		✓
Missouri	Y				
Montana	Y		✓	✓	✓
Nebraska	Y		✓		✓
Nevada	Y		✓		
New Hampshire	N				
New Jersey	Y			✓	✓
New Mexico	Y				✓
New York	Y			<sup>a</sup>	<sup>a</sup>
North Carolina	Y			✓	✓
North Dakota	Y				✓
Ohio	Y		✓		✓
Oklahoma	Y		✓	✓	✓
Oregon	Y				
Pennsylvania	Y	✓			
Rhode Island	Y				
South Carolina	Y	✓			✓
South Dakota	Y		✓	✓	✓
Tennessee	Y				✓
Texas	Y			✓	✓
Utah	Y				
Vermont	Y				
Virginia	Y	✓	✓		✓
Washington	Y		✓		✓
West Virginia	Y				✓
Wisconsin	Y		✓	✓	✓
Wyoming	Y				✓

SOURCE: State Food Stamp Program Director Survey.

n.a. = Not applicable.

<sup>a</sup> Policy varies by locality.



TABLE C3

## DISABILITY BENEFITS USED TO DOCUMENT MENTAL OR PHYSICAL UNFITNESS FOR EMPLOYMENT

State	Receipt of Some Benefits Documents Disability?	No Statewide Policy on Which Benefits	Benefits Specified State-Wide					
			Railroad Retirement Disability	State Disability-Based Benefits	Workers Comp.	Private Disability	Veterans Benefits Always	Benefits Depends on % Disability
Alabama	Y	✓						
Alaska	N							
Arizona	Y			✓			✓	
Arkansas	Y		✓		✓	✓		✓
California	Y	✓						
Colorado	Y		✓	✓	✓	✓		✓
Connecticut	Y		✓	✓	✓	✓	✓	
Delaware	Y		✓	✓	✓	✓	✓	
District of Columbia	n.a.							
Florida	Y				✓			✓
Georgia	Y		✓		✓	✓	✓	
Hawaii	Y		✓	✓	✓	✓		✓
Idaho	Y		✓	✓	✓	✓		✓
Illinois	Y		✓	✓	✓	✓	✓	
Indiana	Y		✓	✓			✓	
Iowa	Y	✓						
Kansas	Y		✓	✓	✓	✓	✓	
Kentucky	Y		✓		✓	✓	✓	
Louisiana	Y		✓		✓	✓	✓	
Maine	Y		✓	✓			✓	
Maryland	Y		✓	✓	✓	✓	✓	
Massachusetts	Y		✓		✓		✓	
Michigan	Y			✓				
Minnesota	Y		✓	✓	✓	✓	✓	
Mississippi	Y		✓		✓	✓		✓
Missouri	Y		✓	✓				✓
Montana	Y		✓		✓	✓		✓
Nebraska	Y		✓	✓			✓	
Nevada	Y		✓		✓	✓	✓	
New Hampshire	Y			✓	✓	✓		✓
New Jersey	Y	✓						
New Mexico	Y		✓	✓	✓	✓	✓	
New York	Y	✓						
North Carolina	Y		✓	✓	✓	✓	✓	
North Dakota	Y		✓		✓	✓	✓	
Ohio	Y		✓		✓	✓	✓	
Oklahoma	Y		✓		✓		✓	
Oregon	Y		✓	✓	✓	✓		✓
Pennsylvania	Y		✓	✓	✓		✓	
Rhode Island	Y		✓	✓	✓		✓	
South Carolina	Y		✓				✓	
South Dakota	Y		✓					✓
Tennessee	Y		✓		✓	✓	✓	
Texas	Y		✓		✓	✓		✓
Utah	Y		✓	✓	✓	✓		✓
Vermont	Y		✓	✓	✓	✓	✓	
Virginia	Y		✓	✓	✓	✓	✓	
Washington	Y		✓	✓	✓	✓		✓
West Virginia	Y		✓		✓		✓	
Wisconsin	Y		✓		✓	✓	✓	
Wyoming	Y		✓		✓	✓		✓

SOURCE: State Food Stamp Program Director Survey.

TABLE C4

## HEALTH PROFESSIONALS THAT CAN CERTIFY CLIENTS AS UNFIT FOR EMPLOYMENT

State	Statewide Policy on Health Professionals?	Local Policy On Health Professionals?	Any Certified/Licensed Professional	Health Professional				
				M.D.	Licensed or Certified Psychologist	Licensed Therapist	Nurse Practitioner	Registered Nurse
Alabama	N	d.k.						
Alaska	Y			✓	✓	✓	✓	✓
Arizona	Y			✓	✓	✓	✓	✓
Arkansas	Y			✓	✓			
California	Y			✓	✓			
Colorado	Y		✓	✓	✓	✓	✓	✓
Connecticut	Y		✓	✓	✓	✓	✓	✓
Delaware	Y			✓	✓	✓	✓	✓
District of Columbia	n.a.							
Florida	Y			✓	✓			
Georgia	N	N						
Hawaii	Y			✓	✓			
Idaho	Y			✓	✓	✓	✓	✓
Illinois	N	N						
Indiana	Y			✓	✓			
Iowa	N	N						
Kansas	Y			✓	✓	✓	✓	✓
Kentucky	Y		✓	✓	✓	✓	✓	✓
Louisiana	N	N						
Maine	Y			✓	✓	✓	✓	
Maryland	Y			✓	✓	✓	✓	✓
Massachusetts	Y			✓	✓		✓	✓
Michigan	Y			✓				
Minnesota	Y			✓	✓			
Mississippi	Y		✓	✓	✓	✓	✓	✓
Missouri	N	N						
Montana	Y			✓	✓	✓	✓	✓
Nebraska	N	N						
Nevada	Y			✓	✓	✓	✓	✓
New Hampshire	N	N						
New Jersey	Y			✓	✓			
New Mexico	Y			✓	✓	✓		
New York	N	Y <sup>b</sup>						
North Carolina	N	d.k.						
North Dakota	Y			✓			✓	
Ohio	Y			✓	✓			
Oklahoma	Y			✓	✓	✓	✓	✓
Oregon	Y		✓	✓	✓	✓	✓	✓
Pennsylvania	Y		✓	✓	✓	✓	✓	✓
Rhode Island	N	Y <sup>a</sup>		✓	✓	✓	✓	
South Carolina	N	N						
South Dakota	Y			✓	✓	✓	✓	
Tennessee	N	N						
Texas	Y			✓	✓			
Utah	N	N						
Vermont	Y			✓	✓	✓		
Virginia	Y		✓	✓	✓	✓	✓	✓
Washington	Y			✓	✓	✓	✓	✓
West Virginia	Y			✓	✓			
Wisconsin	Y			✓	✓	✓	✓	✓
Wyoming	Y			✓	✓			

SOURCE: State Food Stamp Program Director Survey.

d.k. = Respondent didn't know if localities have policies.

n.a. = Not applicable.

<sup>a</sup>The policies shown are applicable in most localities.<sup>b</sup>Local policies exist, but the state does not know if a policy is common in most localities.

TABLE C4 (Continued)

## HEALTH PROFESSIONALS THAT CAN CERTIFY CLIENTS AS UNFIT FOR EMPLOYMENT

State	Physician's Assistant	Drug/Alcohol Treatment Program Professional	Practitioner of Alternative Medicine	Other <sup>c</sup>
Alabama				
Alaska	✓	✓	✓	
Arizona	✓	✓	✓	✓
Arkansas				
California				
Colorado	✓	✓	✓	
Connecticut	✓	✓	✓	
Delaware	✓	✓	✓	
District of Columbia				
Florida		✓		
Georgia				
Hawaii				
Idaho	✓	✓	✓	
Illinois				
Indiana				
Iowa				
Kansas	✓	✓	✓	
Kentucky	✓	✓	✓	
Louisiana				
Maine	✓	✓		
Maryland	✓	✓	✓	✓
Massachusetts		✓	✓	✓
Michigan			✓	
Minnesota			✓	✓
Mississippi		✓	✓	
Missouri				
Montana	✓	✓	✓	
Nebraska				
Nevada		✓	✓	✓
New Hampshire				
New Jersey		✓	✓	
New Mexico	✓	✓		
New York				
North Carolina				
North Dakota	✓		✓	
Ohio				
Oklahoma	✓	✓	✓	
Oregon	✓	✓	✓	
Pennsylvania	✓	✓	✓	
Rhode Island			✓	
South Carolina				
South Dakota	✓	✓	✓	
Tennessee				
Texas	✓			
Utah				
Vermont				
Virginia	✓	✓	✓	
Washington	✓	✓		
West Virginia			✓	
Wisconsin	✓	✓	✓	
Wyoming	✓			✓

SOURCE: State Food Stamp Program Director Survey.

d.k. = Respondent didn't know.

n.a. = Not applicable.

<sup>c</sup> Other includes licensed social worker, midwife, master of mental health, unlicensed psychologist, and acupuncturist.

TABLE C5  
REVIEW OF TEMPORARY DISABILITIES

State	Statewide Policy On Reviews?	Local Policy On Reviews?	No Exemption For Temporary Disabilities	Frequency of Review				Change in Circumstance
				Caseworker Discretion	As Indicated By Health Professional	Specific Number Of Months	At Re-certification	
Alabama	N	d.k.						
Alaska	N	N						
Arizona	Y				✓			
Arkansas	Y				✓		✓	
California	N	d.k.						
Colorado	Y			✓	✓		✓	
Connecticut	Y				✓		✓	
Delaware	Y				✓		✓	
District of Columbia	n.a.							
Florida	Y					✓(3)		
Georgia	Y					✓(varies)		
Hawaii	Y				✓		✓	
Idaho	N	N						
Illinois	Y						✓	
Indiana	Y		✓					
Iowa	N	N						
Kansas	N	N						
Kentucky	Y			✓	✓			
Louisiana	Y						✓	
Maine	Y			✓	✓		✓	
Maryland	Y				✓		✓	
Massachusetts	Y				✓		✓	
Michigan	Y				✓		✓	
Minnesota	Y			✓	✓		✓	
Mississippi	Y			✓	✓		✓	
Missouri	Y		✓					
Montana	Y				✓	✓(1)	✓	
Nebraska	Y				✓		✓	
Nevada	Y						✓	✓
New Hampshire	N	N						
New Jersey	Y						✓	
New Mexico	Y			✓	✓			
New York	N	Y <sup>a</sup>						
North Carolina	Y				✓		✓	
North Dakota	Y						✓	
Ohio	Y						✓	✓
Oklahoma	Y				✓		✓	
Oregon	Y				✓		✓	
Pennsylvania	Y				✓		✓	
Rhode Island	Y						✓	
South Carolina	Y			✓	✓	✓(3)	✓	
South Dakota	Y				✓			
Tennessee	Y				✓			
Texas	Y						✓	
Utah	N	N						
Vermont	Y				✓			
Virginia	Y				✓			
Washington	Y			✓			✓	
West Virginia	Y				✓			
Wisconsin	Y				✓		✓	✓
Wyoming	Y				✓		✓	

SOURCE: State Food Stamp Program Director Survey.

d.k. = Respondent didn't know if localities have policies.  
n.a. = Not applicable.

<sup>a</sup> Local policies exist, but the state does not know if a policy is common in most localities.

TABLE C6  
REVIEW OF PERMANENT DISABILITIES

State	Statewide Policy on Reviews?	Local Policy On Reviews?	Frequency of Review					
			No Review	Caseworker Discretion	As Indicated by Health Professional	Specific Number of Months	At Re-certification	Change in Circumstance
Alabama	Y			✓				
Alaska	Y			✓			✓	
Arizona	N	N						
Arkansas	Y		✓					
California	N	Y						
Colorado	Y			✓			✓	
Connecticut	Y						✓	
Delaware	N	N						
District of Columbia	n.a							
Florida	N	N						
Georgia	N	N						
Hawaii	Y				✓		✓	
Idaho	Y						✓	
Illinois	Y						✓	
Indiana	N	N						
Iowa	N	N						
Kansas	N	N						
Kentucky	Y			✓	✓		✓	
Louisiana	Y						✓	
Maine	N	N						
Maryland	Y				✓		✓	
Massachusetts	Y				✓		✓	
Michigan	Y						✓	
Minnesota	N	N						
Mississippi	Y						✓	
Missouri	Y						✓	
Montana	Y				✓		✓	
Nebraska	Y		✓					
Nevada	Y						✓	✓
New Hampshire	N	N						
New Jersey	Y						✓	
New Mexico	Y			✓	✓			
New York	N	Y <sup>a</sup>						
North Carolina	N	N						
North Dakota	Y						✓	
Ohio	Y						✓	
Oklahoma	Y				✓		✓	
Oregon	Y						✓	
Pennsylvania	Y						✓	
Rhode Island	Y						✓	
South Carolina	N	N						
South Dakota	Y						✓	✓
Tennessee	N	N						
Texas	Y						✓	
Utah	N	N						
Vermont	Y						✓	
Virginia	Y						✓	
Washington	Y			✓			✓	
West Virginia	Y		✓					
Wisconsin	Y						✓	
Wyoming	Y						✓	

SOURCE: State Food Stamp Program Director Survey.

d.k. = Respondent didn't know.

n.a. = Not applicable.

<sup>a</sup> The state does not know if a policy is common in most localities.

TABLE C7

## POLICY ON AGE OF DEPENDENT CHILDREN AND NUMBER OF ADULTS MADE EXEMPT

State	Statewide Policy?	Age Individual Is No Longer a Dependent Child	Number of Adults Exempted			
			Only One Adult	Up to Two Adults	All Adults That Meet The Criteria	All Adults
Alabama	Y	18			✓	
Alaska	Y	6				✓
Arizona	Y	18			✓	
Arkansas	Y	18				✓
California	Y	18				✓
Colorado	Y	18				✓
Connecticut	Y	18				✓
Delaware	Y	18			✓	
District of Columbia	n.a.	n.a.				
Florida	Y	18	✓ <sup>c</sup>			
Georgia	Y	18			✓	
Hawaii	Y	18				✓
Idaho	Y	18			✓	
Illinois	Y	18				✓
Indiana	Y	18			✓	
Iowa	Y	18				✓
Kansas	Y	18			✓	
Kentucky	Y	18			✓	
Louisiana	Y	18			✓	
Maine	Y	18			✓	
Maryland	Y	18			✓	
Massachusetts	Y	18				✓
Michigan	Y	18				✓
Minnesota	Y	18			✓	
Mississippi	Y	18			✓	
Missouri	Y	18				✓
Montana	Y	17			✓	
Nebraska	N <sup>a</sup>	n.a. <sup>b</sup>				✓
Nevada	Y	18 <sup>b</sup>			✓	
New Hampshire	Y	18			✓	
New Jersey	Y	18				✓
New Mexico	Y	18				✓
New York	Y	18	✓			
North Carolina	Y	18			✓	
North Dakota	Y	17				✓
Ohio	Y	18			✓	
Oklahoma	Y	18				✓
Oregon	Y	18		✓		
Pennsylvania	Y	17	✓			
Rhode Island	Y	7	✓			
South Carolina	Y	18			✓	
South Dakota	Y	18				✓
Tennessee	Y	18			✓	
Texas	Y	18			✓	
Utah	Y	18				✓
Vermont	Y	18				✓
Virginia	Y	18				✓
Washington	Y	18			✓	
West Virginia	Y	18				✓
Wisconsin	Y	18				✓
Wyoming	Y	18			✓	

SOURCE: State Food Stamp Director Survey.

n.a. = Not applicable.

<sup>a</sup>Nebraska's policy on age is not set at the state level. However, the policy on which adults are exempt is set at the state level.<sup>b</sup>Can be age 19 if in high school.<sup>c</sup>In Florida, two adults can be exempt if there is an incapacitated adult in the household.

TABLE C8

## EXEMPT ADULTS IN HOUSEHOLDS WITH DEPENDENT CHILDREN

State	Exempt Adults			
	Parent or Guardian Only	Demonstrate Care/ Responsibility	Chosen by Family	Any
Alabama		✓		
Alaska				✓
Arizona		✓		
Arkansas				✓
California				✓
Colorado				✓
Connecticut				✓
Delaware		✓		
District of Columbia				
Florida			✓	
Georgia	✓			
Hawaii				✓
Idaho	✓			
Illinois				✓
Indiana	✓			
Iowa				✓
Kansas	✓			
Kentucky		✓		
Louisiana		✓		
Maine	✓			
Maryland		✓		
Massachusetts				✓
Michigan				✓
Minnesota		✓		
Mississippi		✓		
Missouri				✓
Montana	✓			
Nebraska				✓
Nevada	✓			
New Hampshire	✓			
New Jersey				✓
New Mexico				✓
New York		✓		
North Carolina	✓			
North Dakota				✓
Ohio	✓			
Oklahoma				✓
Oregon			✓	
Pennsylvania	✓			
Rhode Island	✓			
South Carolina	✓			
South Dakota				✓
Tennessee	✓			
Texas	✓			
Utah				✓
Vermont				✓
Virginia				✓
Washington	✓			
West Virginia				✓
Wisconsin				✓
Wyoming	✓			

SOURCE: State Food Stamp Program Director Survey.

TABLE C9

## WAIVERS IMPLEMENTED IN PREVIOUS 12 MONTHS

State	Waivers In Effect During Previous 12 Months	Some Approved Waivers Not Implemented	Reason for Not Implementing All Approved Waivers			
			Economic Conditions Improved	County Refused	Political Reasons	County Partially Waived
Alabama	Y					
Alaska	Y					
Arizona	Y					
Arkansas	Y					
California	Y					
Colorado	Y					
Connecticut	Y					
Delaware	N					
District of Columbia	Y					
Florida	Y					
Georgia	Y					
Hawaii	Y					
Idaho	Y					
Illinois	Y					
Indiana	Y					
Iowa	N					
Kansas	N					
Kentucky	Y					
Louisiana	Y					
Maine	Y					
Maryland	Y					
Massachusetts	N					
Michigan	N					
Minnesota	Y					
Mississippi	N					
Missouri	Y					
Montana	Y					
Nebraska	Y					
Nevada	Y					
New Hampshire	N					
New Jersey	Y					
New Mexico	Y					
New York	Y	Y	✓	✓		✓
North Carolina	N					
North Dakota	Y					
Ohio	N					
Oklahoma	N					
Oregon	N					
Pennsylvania	Y					
Rhode Island	Y					
South Carolina	Y					
South Dakota	Y					
Tennessee	Y					
Texas	Y					
Utah	Y					
Vermont	Y					
Virginia	Y					
Washington	Y	Y		✓		
West Virginia	Y					
Wisconsin	N					
Wyoming	Y					

SOURCE: State Food Stamp Program Director Survey.



TABLE C10

## STATE USE OF THE 15 PERCENT EXEMPTION

State	15 Percent Exemption Used?	Year First Used	Future Plans to Use 15 Percent Exemption? <sup>a</sup>
Alabama	N		Y
Alaska	Y	1997	
Arizona	Y	1999	
Arkansas	Y	1998	
California	Y	1997	
Colorado	Y	1998	
Connecticut	Y	1999	
Delaware	N		N
District of Columbia	n.a.		
Florida	Y	1997	
Georgia	Y	1997	
Hawaii	N		Y
Idaho	Y	1998	
Illinois	Y	1998	
Indiana	Y	1997	
Iowa	Y	2000	
Kansas	Y	1998	
Kentucky	Y	1997	
Louisiana	Y	1997	
Maine	Y	1997	
Maryland	Y	1998	
Massachusetts	Y	1998	
Michigan	N		Y
Minnesota	Y	1997	
Mississippi	Y	1998	
Missouri	Y	1999	
Montana	N		N
Nebraska	Y	1997	
Nevada	Y	1999	
New Hampshire	Y	1997	
New Jersey	Y	1999	
New Mexico	N		N
New York	Y	1998	
North Carolina	Y	1997	
North Dakota	N		N
Ohio	N		N
Oklahoma	N		N
Oregon	Y	1998	
Pennsylvania	Y	1999	
Rhode Island	N		Y
South Carolina	Y	1998	
South Dakota	N		Y
Tennessee	Y	1999	
Texas	N		N
Utah	Y	1998	
Vermont	Y	1998	
Virginia	N		N
Washington	Y	1998	
West Virginia	Y	1998	
Wisconsin	N		Y
Wyoming	N		N

SOURCE: State Food Stamp Program Director Survey.

d.k. = Respondent didn't know.

n.a. = Not applicable.

<sup>a</sup>Asked only of states not using the 15 percent exemption.

TABLE C11

## REASONS FOR USING 15 PERCENT EXEMPTION

State	State Uses 15 Percent Exemption	Reason							
		Preserve Benefits For As Many As Possible	Preserve Benefits For Specific Population	Reduce Administrative Burden	Exempt Balance Of Partially-Waived Area	Exempt Area Denied Waiver	Insufficient Jobs	Local Office Decision	Advocacy Group Pressure
Alabama	N								
Alaska	Y		✓			✓			
Arizona	Y		✓						
Arkansas	Y	✓							
California	Y	✓	✓						
Colorado	Y		✓						
Connecticut	Y	✓							
Delaware	N								
District of Columbia	n.a.								
Florida	Y					✓			
Georgia	Y	✓							
Hawaii	N								
Idaho	Y							✓	
Illinois	Y	✓							
Indiana	Y							✓	
Iowa	Y			✓					
Kansas	Y	✓							
Kentucky	Y					✓			
Louisiana	Y							✓	
Maine	Y	✓							
Maryland	Y		✓			✓			
Massachusetts	Y		✓						
Michigan	N								
Minnesota	Y		✓						
Mississippi	Y		✓						
Missouri	Y	✓							
Montana	N								
Nebraska	Y	✓						✓	
Nevada	Y		✓						
New Hampshire	Y	✓				✓			
New Jersey	Y	✓							
New Mexico	N								
New York	Y					✓		✓	
North Carolina	Y	✓							
North Dakota	N								
Ohio	N								
Oklahoma	N								
Oregon	Y	✓							
Pennsylvania	Y								✓
Rhode Island	N								
South Carolina	Y					✓			
South Dakota	N								
Tennessee	Y	✓							
Texas	N								
Utah	Y							✓	
Vermont	Y	✓	✓						
Virginia	N								
Washington	Y		✓			✓			
West Virginia	Y		✓						
Wisconsin	N								
Wyoming	N								

SOURCE: State Food Stamp Program Director Survey.

TABLE C12

## REASONS FOR NOT USING THE 15 PERCENT EXEMPTION

State	Reasons For Not Using 15 Percent Exemption									Will Use 15 Percent Exemption in Future
	Local Input in Decision Not to Use?	Too Few Abawds	Sufficient Jobs	Sufficient Workfare/E&T	Requires State Regulatory Process	Political Reasons	Too Difficult to Monitor	To Be Consistent with TANF	Other <sup>a</sup>	
Alabama	N						✓			Y
Alaska										
Arizona										
Arkansas										
California										
Colorado										
Connecticut										
Delaware	N		✓			✓	✓			N
District of Columbia										
Florida										
Georgia										
Hawaii	N						✓			Y
Idaho										
Illinois										
Indiana										
Iowa										
Kansas										
Kentucky										
Louisiana										
Maine										
Maryland										
Massachusetts										
Michigan	N							✓		Y
Minnesota										
Mississippi										
Missouri										
Montana	Y						✓			N
Nebraska										
Nevada										
New Hampshire										
New Jersey										
New Mexico	N	✓			✓					N
New York										
North Carolina										
North Dakota	N						✓			N
Ohio	N							✓		N
Oklahoma	N					✓				N
Oregon										
Pennsylvania										
Rhode Island	N								✓	Y
South Carolina										
South Dakota	N								✓	Y
Tennessee										
Texas	N					✓				N
Utah										
Vermont										
Virginia	N		✓			✓				N
Washington										
West Virginia										
Wisconsin	N		✓	✓				✓		Y
Wyoming	N								✓	N

SOURCE: State Food Stamp Program Director Survey.

<sup>a</sup>Other includes states unclear how to implement 15 percent exemption, states who did not implement in time, and states that did not know the reason.

TABLE C13

## USE OF 15 PERCENT EXEMPTION IN COUNTIES WITH AND WITHOUT WAIVERS

State	Used In All Counties Without Waivers?	Used In Most Counties Without Waivers?	Reason Not Used in All Counties Without Waivers				
			Sufficient Jobs	Sufficient Workfare/ E&T	Build Reserve	Some Counties Did Not Meet Criteria For Use	Unclear How To Implement
Alabama	n.a.						
Alaska	Y						
Arizona	Y						
Arkansas	Y						
California	N		✓	✓			✓
Colorado	Y						
Connecticut	N		✓				
Delaware	n.a.						
District of Columbia	n.a.						
Florida	N		✓				
Georgia	Y						
Hawaii	n.a.						
Idaho	Y						
Illinois	Y						
Indiana	Y						
Iowa	N	✓				✓	
Kansas	Y						
Kentucky	N					✓	
Louisiana	N	✓					
Maine	Y						
Maryland	Y						
Massachusetts	Y						
Michigan	n.a.						
Minnesota	Y						
Mississippi	Y						
Missouri	Y						
Montana	n.a.						
Nebraska	N		✓	✓			
Nevada	Y						
New Hampshire	N			✓	✓		
New Jersey	N					✓	
New Mexico	n.a.						
New York	N						
North Carolina	N		✓				
North Dakota	n.a.						
Ohio	n.a.						
Oklahoma	N						
Oregon	Y						
Pennsylvania	Y						
Rhode Island	n.a.						
South Carolina	Y						
South Dakota	n.a.						
Tennessee	Y						
Texas	n.a.						
Utah	Y						
Vermont	Y						
Virginia	n.a.						
Washington	Y						
West Virginia	Y						
Wisconsin	n.a.						
Wyoming	n.a.						

SOURCE: State Food Stamp Program Director Survey.

n.a. = Not applicable -- state does not use 15 percent exemption.

TABLE C14

## CRITERIA FOR DETERMINING 15 PERCENT EXEMPTION

State	State Uses 15 Percent Exemption	Based On Geographic Characteristics	Based On Individual Characteristics	Extend Time Limit To All	Indefinitely Exempt All
Alabama	N				
Alaska	Y	✓	✓		
Arizona	Y	✓	✓		
Arkansas	Y				✓
California	Y <sup>a</sup>				
Colorado	Y	✓	✓		
Connecticut	Y	✓			
Delaware	N				
District of Columbia	n.a.				
Florida	Y	✓			
Georgia	Y		✓		
Hawaii	N				
Idaho	Y		✓		
Illinois	Y				✓
Indiana	Y		✓		
Iowa	Y	✓			
Kansas	Y		✓		
Kentucky	Y	✓			
Louisiana	Y	✓			
Maine	Y		✓		
Maryland	Y	✓	✓		
Massachusetts	Y		✓		
Michigan	N				
Minnesota	Y		✓		
Mississippi	Y		✓		
Missouri	Y			✓	
Montana	N				
Nebraska	Y	✓			
Nevada	Y		✓		
New Hampshire	Y	✓			
New Jersey	Y	✓			
New Mexico	N				
New York	Y <sup>a</sup>				
North Carolina	Y	✓			
North Dakota	N				
Ohio	N				
Oklahoma	N				
Oregon	Y		✓		
Pennsylvania	Y		✓		
Rhode Island	N				
South Carolina	Y	✓			
South Dakota	N				
Tennessee	Y			✓	
Texas	N				
Utah	Y <sup>a</sup>				
Vermont	Y	✓	✓		
Virginia	N				
Washington	Y	✓	✓		
West Virginia	Y		✓		
Wisconsin	N				
Wyoming	N				

SOURCE: State Food Stamp Program Director Survey.

n.a. = Not applicable.

<sup>a</sup> 15 percent exemption policy varies by locality.

TABLE C15

## 15 PERCENT EXEMPTION POLICIES BASED ON GEOGRAPHIC AREA

Characteristics of Geographic Areas Used for 15 Percent Exemption							
State	Exemption Based On Geographic Area	Unsuccessful In Obtaining Waiver	Poor Labor Market/Economy	Balance Of Waived County	Poor Transportation	Little Or No E&T	Area Has Few ABAWDS
Alabama	n.a.						
Alaska	Y	✓	✓				
Arizona	Y				✓	✓	
Arkansas	N						
California	<sup>a</sup>						
Colorado	Y						✓
Connecticut	Y	✓					
Delaware	n.a.						
District of Columbia	n.a.						
Florida	Y	✓					
Georgia	N						
Hawaii	n.a.						
Idaho	N						
Illinois	N						
Indiana	N						
Iowa	Y						✓
Kansas	N						
Kentucky	Y			✓			
Louisiana	Y		✓				
Maine	N						
Maryland	Y	✓		✓			
Massachusetts	N						
Michigan	n.a.						
Minnesota	N						
Mississippi	N						
Missouri	N						
Montana	n.a.						
Nebraska	Y		✓				
Nevada	N						
New Hampshire	Y	✓					
New Jersey	Y				✓		
New Mexico	n.a.						
New York	<sup>a</sup>						
North Carolina	Y				✓	✓	
North Dakota	n.a.						
Ohio	n.a.						
Oklahoma	n.a.						
Oregon	N						
Pennsylvania	N						
Rhode Island	n.a.						
South Carolina	Y	✓		✓			
South Dakota	n.a.						
Tennessee	N						
Texas	n.a.						
Utah	N						
Vermont	Y		✓	✓	✓		
Virginia	n.a.						
Washington	Y			✓		✓	
West Virginia	N						
Wisconsin	n.a.						
Wyoming	n.a.						

SOURCE: State Food Stamp Program Director Survey.

n.a. = Not applicable -- state does not use 15 percent exemption.

<sup>a</sup> 15 percent exemption policy varies by locality.

TABLE C16

15 PERCENT EXEMPTION POLICIES BASED ON INDIVIDUAL CHARACTERISTICS

State	Individual Characteristics Used for 15 Percent Exemption					
	Exemption Based on Individual Characteristics	Deemed Unemployable	Over Specific Age	Undocumented Health Problems	Homeless	Inadequate Work History
Alabama	n.a.					
Alaska	Y	✓				
Arizona	Y					
Arkansas	N					
California	<sup>a</sup>					
Colorado	Y			✓	✓	
Connecticut	N					
District of Columbia	n.a.					
Delaware	n.a.					
Florida	N					
Georgia	Y	✓			✓	
Hawaii	n.a.					
Idaho	Y					
Illinois	N					
Indiana	Y					
Iowa	N					
Kansas	Y		✓			
Kentucky	N					
Louisiana	N					
Maine	Y				✓	
Maryland	Y		✓			
Massachusetts	Y	✓				
Michigan	n.a.					
Minnesota	Y					
Mississippi	Y					
Missouri	N					
Montana	n.a.					
Nebraska	N					
Nevada	Y			✓		
New Hampshire	N					
New Jersey	N					
New Mexico	n.a.					
New York	<sup>a</sup>					
North Carolina	N					
North Dakota	n.a.					
Ohio	n.a.					
Oklahoma	n.a.					
Oregon	Y	✓		✓	✓	✓
Pennsylvania	Y		✓			
Rhode Island	n.a.					
South Carolina	N					
South Dakota	n.a.					
Tennessee	N					
Texas	n.a.					
Utah	Y <sup>a</sup>					
Vermont	Y				✓	
Virginia	n.a.					
Washington	Y				✓	
West Virginia	Y		✓			
Wisconsin	n.a.					
Wyoming	n.a.					

SOURCE: State Food Stamp Program Director Survey.

n.a. = Not applicable -- state does not use 15 percent exemption.

<sup>a</sup> 15 percent exemption policy varies by locality.

TABLE C-17

## 15 PERCENT EXEMPTION POLICIES BASED ON INDIVIDUAL CHARACTERISTICS

State	Individual Characteristics Used for 15 Percent Exemption				
	Inadequate Education Level	Inadequate Transportation	Waiting For E&T Slot	In ESL/GED And Not Meeting Work Requirement	Other <sup>b</sup>
Alabama					
Alaska					
Arizona		✓			
Arkansas					
California					
Colorado					✓
Connecticut					
District of Columbia					
Delaware					
Florida					
Georgia					
Hawaii					
Idaho			✓		
Illinois					
Indiana				✓	
Iowa					
Kansas					
Kentucky					
Louisiana					
Maine	✓	✓			✓
Maryland					
Massachusetts				✓	
Michigan					
Minnesota					✓
Mississippi			✓		
Missouri					
Montana					
Nebraska					
Nevada					✓
New Hampshire					
New Jersey					
New Mexico					
New York					
North Carolina					
North Dakota					
Ohio					
Oklahoma					
Oregon	✓	✓			
Pennsylvania					
Rhode Island					
South Carolina					
South Dakota					
Tennessee					
Texas					
Utah					
Vermont		✓			✓
Virginia					
Washington	✓				
West Virginia					
Wisconsin					
Wyoming					

SOURCE: State Food Stamp Program Director Survey.

<sup>b</sup> Other includes: Violent client, limited language, GA recipients, employed by closed mine, or recently released from mental institution.



TABLE C-18

## LENGTH OF 15 PERCENT EXEMPTION

State	Length of Exemption			
	As Long As Criteria Are Met (No Limit)	Specified Time Limit for All	Caseworker Discretion	Varies By Client
Alabama				
Alaska			✓	
Arizona	✓			
Arkansas	✓			
California	<sup>a</sup>			
Colorado	✓			
Connecticut	✓			
Delaware				
District of Columbia				
Florida	✓			
Georgia	✓			
Hawaii				
Idaho				
Illinois	✓			
Indiana	✓			
Iowa	✓			
Kansas	✓			
Kentucky	✓			
Louisiana	✓			
Maine	✓			
Maryland	✓			
Massachusetts	✓			
Michigan				
Minnesota	✓			
Mississippi		✓ (6months)		
Missouri		✓ (2months)		
Montana				
Nebraska	✓			
Nevada	✓			
New Hampshire	✓			
New Jersey	✓			
New Mexico				
New York	✓			
North Carolina	✓			
North Dakota				
Ohio				
Oklahoma				
Oregon	✓		✓	
Pennsylvania	✓			
Rhode Island				
South Carolina	✓			
South Dakota				
Tennessee		✓ (2months)		
Texas				
Utah			✓	
Vermont				✓
Virginia				
Washington				✓
West Virginia	✓			
Wisconsin				
Wyoming				

SOURCE: State Food Stamp Program Director Survey.

<sup>a</sup> 15 percent exemption policy varies by locality.

TABLE C19

PLANS FOR CHANGING EXISTING 15 PERCENT EXEMPTION POLICIES

State	Plan To Change Policy Next Year?	Expected Change
Alabama	n.a.	
Alaska	N	
Arizona	N	
Arkansas	N	
California	N	
Colorado	N	
Connecticut	Y	Cover as many non-waived counties as possible
Delaware	n.a.	
District of Columbia	n.a.	
Florida	N	
Georgia	Y	Broaden criteria
Hawaii	n.a.	
Idaho	N	
Illinois	N	
Indiana	Y	Provide more months
Iowa	N	
Kansas	N	
Kentucky	N	
Louisiana	N	
Maine	N	
Maryland	N	
Massachusetts	N	
Michigan	n.a.	
Minnesota	N	
Mississippi	N	
Missouri	N	
Montana	n.a.	
Nebraska	N	
Nevada	N	
New Hampshire	N	
New Jersey	N	
New Mexico	n.a.	
New York	N	
North Carolina	N	
North Dakota	n.a.	
Ohio	n.a.	
Oklahoma	n.a.	
Oregon	Y	Cover non-waived counties
Pennsylvania	Y	Add individual characteristics
Rhode Island	n.a.	
South Carolina	N	
South Dakota	n.a.	
Tennessee	N	
Texas	n.a.	
Utah	N	
Vermont	N	
Virginia	n.a.	
Washington	N	
West Virginia	N	
Wisconsin	n.a.	
Wyoming	n.a.	

SOURCE: State Food Stamp Program Director Survey.

n.a. = Not applicable -- state does not use 15 percent exemption.

TABLE C20

## ALLOTMENTS AND USE OF 15 PERCENT EXEMPTION, FY99

State	Allotment	Allotment Plus Carryover from FY98	Exemptions Used	Exemptions Used as Percent of Allotment Plus Carryover
Alabama	1,633	3,283	0	0.0
Alaska	117	295	17	5.7
Arizona	750	1,594	74	4.7
Arkansas	757	1,440	276	19.2
California	11,560	15,087	392	2.6
Colorado	455	926	42	4.5
Connecticut	533	1,050	83	7.9
Delaware	145	301	0	0.0
District of Columbia	0	0	0	0.0
Florida	2,245	4,684	407	8.7
Georgia	2,147	4,373	105	2.4
Hawaii	437	856	29	3.4
Idaho	252	505	11	2.2
Illinois	2,925	4,828	1992	41.3
Indiana	1,124	2,255	10	0.5
Iowa	456	931	0	0.0
Kansas	363	627	304	48.5
Kentucky	1,213	1,190	566	47.5
Louisiana	966	1,121	1180	105.3
Maine	431	841	20	2.4
Maryland	523	939	280	29.8
Massachusetts	1,057	2,056	527	25.6
Michigan	6,276	12,544	0	0.0
Minnesota	750	1,413	518	36.7
Mississippi	1,718	3,611	568	15.7
Missouri	1,517	3,249	18	0.6
Montana	235	465	0	0.0
Nebraska	334	589	120	20.3
Nevada	388	802	33	4.1
New Hampshire	60	119	19	15.8
New Jersey	823	1,679	0	0.0
New Mexico	339	718	0	0.0
New York	2,881	5,954	67	1.1
North Carolina	2,318	4,001	968	24.2
North Dakota	136	276	0	0.0
Ohio	3,126	6,522	0	0.0
Oklahoma	1,433	2,774	0	0.0
Oregon	1,578	2,842	91	3.2
Pennsylvania	1,767	3,562	0	0.0
Rhode Island	103	209	0	0.0
South Carolina	659	1,277	84	6.5
South Dakota	104	204	0	0.0
Tennessee	3,046	5,817	22	0.4
Texas	4,819	10,061	0	0.0
Utah	230	458	96	20.9
Vermont	311	619	14	2.3
Virginia	2,035	4,265	0	0.0
Washington	783	1,650	396	24.0
West Virginia	412	809	22	2.7
Wisconsin	671	1,415	0	0.0
Wyoming	149	307	0	0.0

SOURCE: FNS Form 583 and FNS' website.

TABLE C21

## STATE PLANS TO USE 15 PERCENT EXEMPTION IN FY00

State	Reason For Using Less Than Allotment							
	Plans to Use Less Than Total Allotment	Sufficient Jobs	Sufficient E&T	Not Enough ABAWDs	Sufficient Carryover	Difficulty Choosing Criteria	Reserve for Economic Downturn	Other <sup>a</sup>
Alabama								
Alaska	✓ <sup>b</sup>							
Arizona								
Arkansas								
California	✓					✓		
Colorado	✓	✓		✓				
Connecticut								
Delaware								
District of Columbia								
Florida								
Georgia								
Hawaii								
Idaho	✓	✓	✓					
Illinois								
Indiana								
Iowa								
Kansas								
Kentucky								
Louisiana								
Maine								
Maryland								
Massachusetts	✓			✓				
Michigan								
Minnesota	✓	✓	✓	✓				
Mississippi	✓		✓					
Missouri	✓				✓			
Montana								
Nebraska								
Nevada	✓				✓			
New Hampshire	✓						✓	
New Jersey								
New Mexico								
New York	✓							✓
North Carolina								
North Dakota								
Ohio								
Oklahoma								
Oregon	✓	✓			✓			
Pennsylvania	✓							✓
Rhode Island								
South Carolina								
South Dakota								
Tennessee	✓			✓				
Texas								
Utah	✓			✓				
Vermont	✓		✓					
Virginia								
Washington	✓			✓				
West Virginia								
Wisconsin								
Wyoming								

SOURCE: State Food Stamp Program Director Survey.

<sup>a</sup> Other includes states with localities that choose not to use exemptions and states with recently introduced exemptions.<sup>b</sup> Respondent did not know why the state planned to use less than its allotment

TABLE C22

## EXEMPTIONS USED IN 1999 RELATIVE TO NUMBER PLANNED

State	Number Of Exemptions Used Relative To Number Planned	Reason Used More/Fewer Than Planned		
		More/Fewer Counties Used Exemptions	Criteria Led To More/Fewer Than Expected	More/Fewer ABAWDs Qualified for Exemptions
Alabama	n.a.			
Alaska	same			
Arizona	fewer		✓	
Arkansas	same			
California	fewer	✓		
Colorado	same			
Connecticut	same			
Delaware	n.a.			
District of Columbia	n.a.			
Florida	same			
Georgia	fewer	✓		
Hawaii	n.a.			
Idaho	fewer			✓
Illinois	fewer			✓
Indiana	same			
Iowa	n.a.			
Kansas	same			
Kentucky	same			
Louisiana	more		✓	
Maine	fewer			✓
Maryland	same			
Massachusetts	same			
Michigan	n.a.			
Minnesota	same			
Mississippi	fewer		✓	
Missouri	same			
Montana	n.a.			
Nebraska	same			
Nevada	fewer		✓	
New Hampshire	same			
New Jersey	fewer			✓
New Mexico	n.a.			
New York	more			✓
North Carolina	same			
North Dakota	n.a.			
Ohio	n.a.			
Oklahoma	n.a.			
Oregon	same			
Pennsylvania	fewer			✓
Rhode Island	n.a.			
South Carolina	same			
South Dakota	n.a.			
Tennessee	n.a.			
Texas	n.a.			
Utah	fewer			✓
Vermont	same			
Virginia	n.a.			
Washington	fewer			✓
West Virginia	same			
Wisconsin	n.a.			
Wyoming	n.a.			

SOURCE: State Food Stamp Program Director Survey.

n.a. = Not applicable.

TABLE C23  
STATE ABAWD POLICY RANKINGS

State	Disability Certification Policy <sup>a</sup>	Dependent Children Policy <sup>b</sup>	Waiver Use <sup>c</sup>	15 Percent Exemption Use <sup>d</sup>	Aggregate Policy Measure
Alabama	1	1	1	0	3
Alaska	2	0	2	1	5
Arizona	2	1	1	1	5
Arkansas	0	2	2	2	6
California	1	2	0	1	4
Colorado	1	2	1	1	5
Connecticut	0	2	2	1	5
Delaware	2	1	0	0	3
Florida	1	0	2	1	4
Georgia	2	1	2	1	6
Hawaii	2	2	1	1	6
Idaho	1	1	0	1	3
Illinois	2	2	2	2	8
Indiana	1	1	1	1	4
Iowa	0	2	0	0	2
Kansas	0	1	0	2	3
Kentucky	1	1	2	2	6
Louisiana	2	1	2	2	7
Maine	2	1	2	1	6
Maryland	1	1	2	2	6
Massachusetts	1	2	0	2	5
Michigan	2	2	0	0	4
Minnesota	0	1	1	2	4
Mississippi	1	1	0	2	4
Missouri	0	2	1	1	4
Montana	2	1	2	0	5
Nebraska	1	2	1	2	6
Nevada	0	1	1	1	3
New Hampshire	0	1	0	2	3
New Jersey	2	2	2	0	6
New Mexico	1	2	2	0	5
New York	1	0	1	1	3
North Carolina	2	1	0	2	5
North Dakota	1	2	1	0	4
Ohio	1	1	0	0	2
Oklahoma	2	2	0	0	4
Oregon	0	1	0	1	2
Pennsylvania	0	0	2	0	2
Rhode Island	0	0	2	0	2
South Carolina	1	1	1	1	4
South Dakota	2	2	2	0	6
Tennessee	1	1	1	1	4
Texas	2	1	1	0	4
Utah	0	2	1	2	5
Vermont	0	2	1	1	4
Virginia	1	2	1	0	4
Washington	1	1	2	2	6
West Virginia	1	2	2	1	6
Wisconsin	2	2	0	0	4
Wyoming	1	1	1	0	3

SOURCE: State Food Stamp Program Director Survey.

n.a. = Not applicable.

<sup>a</sup>Equals 2 if client self report, 1 if caseworker observation or if policy varies by county, 0 otherwise.

<sup>b</sup>Equals 2 if all adults exempt, 1 if multiple adults but not all exempt, 0 if 1 adult exempt or children defined as under 17

<sup>c</sup>Equals 2 if percent of adults in waived areas is above median, 1 if state uses waiver but percent of adults in waived areas is below the median, 0 if no waivers.

<sup>d</sup>Equals 2 if state uses more than 10 percent of allotment, 1 if state uses less than 10 percent of the allotment, 0 if state doesn't use 15 percent exemption.

**APPENDIX D**

**STATE POLICIES ON MEETING THE WORK REQUIREMENT AND THE PROVISION OF  
QUALIFYING WORK ACTIVITIES**

TABLE D1

## POLICIES ON WORKING WITHOUT PAY, 2000

State	Statewide Policy?	Local Policy?	Meets Work Requirement			
			Always	If Paid In- Kind	If Community Service	At Caseworker Discretion
Alabama	Y			✓	✓	
Alaska	Y		✓			
Arizona	Y		✓			
Arkansas	Y					
California	Y					
Colorado	Y					
Connecticut	Y		✓			
Delaware	Y		✓			
District of Columbia	n.a.					
Florida	Y					
Georgia	N	N				
Hawaii	N	N				
Idaho	Y					
Illinois	Y		✓			
Indiana	Y					
Iowa	Y		✓			
Kansas	Y					
Kentucky	Y		✓			
Louisiana	Y		✓			
Maine	Y		✓			
Maryland	Y		✓			
Massachusetts	Y		✓			
Michigan	Y		✓			
Minnesota	Y		✓			
Mississippi	Y					✓
Missouri	N	N				
Montana	Y		✓			
Nebraska	N	N				
Nevada	Y			✓		
New Hampshire	N	N				
New Jersey	Y					
New Mexico	Y					
New York	N	N				
North Carolina	Y		✓			
North Dakota	Y		✓			
Ohio	Y		✓			
Oklahoma	Y					
Oregon	Y		✓			
Pennsylvania	Y		✓			
Rhode Island	Y					
South Carolina	Y		✓			
South Dakota	Y					
Tennessee	Y				✓	
Texas	Y		✓			
Utah	Y					
Vermont	Y					
Virginia	Y		✓			
Washington	Y					
West Virginia	Y					
Wisconsin	Y		✓			
Wyoming	Y				✓	

SOURCE: State Food Stamp Program Director Survey.

n.a. = Not applicable.



TABLE D2

## COMBINING WORK AND QUALIFYING WORK ACTIVITIES, 2000

State	If Combined for 20 or More Hours				
	Statewide Policy?	Local Policy?	Always	Meets Work Requirement	
				When Not Enough Jobs/Training Available	If They Combine 30 Hours or More
Alabama	Y		✓		
Alaska	N	N			
Arizona	Y		✓		
Arkansas	N	N			
California	Y		✓		
Colorado	Y		✓		
Connecticut	Y		✓		
Delaware	Y		✓		
District of Columbia	n.a.				
Florida	Y		✓		
Georgia	Y		✓		
Hawaii	Y		✓		
Idaho	Y		✓		
Illinois	Y		✓		
Indiana	Y		✓		
Iowa	Y				
Kansas	Y				
Kentucky	Y		✓		
Louisiana	Y		✓		
Maine	Y		✓		
Maryland	Y			✓	
Massachusetts	Y		✓		
Michigan	Y		✓		
Minnesota	Y		✓		
Mississippi	Y				
Missouri	Y		✓		
Montana	Y		✓		
Nebraska	Y				
Nevada	Y		✓		
New Hampshire	Y		✓		
New Jersey	Y				✓
New Mexico	Y		✓		
New York	Y		✓		
North Carolina	Y		✓		
North Dakota	Y		✓		
Ohio	Y		✓		
Oklahoma	Y				
Oregon	Y		✓		
Pennsylvania	Y		✓		
Rhode Island	N	N			
South Carolina	Y		✓		
South Dakota	Y		✓		
Tennessee	Y			✓	
Texas	Y		✓		
Utah	N	N			
Vermont	N	N			
Virginia	Y		✓		
Washington	Y		✓		
West Virginia	Y				
Wisconsin	Y		✓		
Wyoming	Y				

SOURCE: State Food Stamp Program Director Survey.

n.a. = Not applicable.

TABLE D3

JOB SEARCH REQUIRED OF ABAWDS AND JOB SEARCH TRAINING  
OFFERED TO ABAWDS, FY99

State	Job Search Required	Job Search Training Offered
Alabama	✓	
Alaska	✓	✓
Arizona	✓	✓
Arkansas		
California	✓	✓
Colorado		
Connecticut	✓	✓
Delaware	✓	
District of Columbia	✓	
Florida	✓	✓
Georgia		
Hawaii	✓	✓
Idaho	✓	✓
Illinois	✓	✓
Indiana	✓	✓
Iowa	✓	✓
Kansas		
Kentucky	✓	
Louisiana		✓
Maine		✓
Maryland	✓	✓
Massachusetts		
Michigan		✓
Minnesota	✓	✓
Mississippi	✓	✓
Missouri		
Montana		
Nebraska	✓	✓
Nevada	✓	✓
New Hampshire	✓	✓
New Jersey	✓	✓
New Mexico		
New York	✓	✓
North Carolina	✓	✓
North Dakota		✓
Ohio		
Oklahoma		
Oregon	✓	✓
Pennsylvania		✓
Rhode Island	✓	
South Carolina	✓	✓
South Dakota	✓	✓
Tennessee	✓	✓
Texas	✓	✓
Utah	✓	✓
Vermont	✓	✓
Virginia		
Washington	✓	✓
West Virginia	✓	✓
Wisconsin	✓	✓
Wyoming	✓	✓

SOURCE: State E&T Managers Survey.

TABLE D4  
JOB SEARCH REQUIREMENTS, FY99

State	Statewide Policy?	Minimum Number of Contacts Required	Minimum Number of Hours Required	Requiring Clients to Document Job Contacts Made	Other Requirement <sup>d</sup>
Alabama	Y	20 / 2 weeks	No requirement	✓	
Alaska	Y	20 / 2 months	No requirement	✓	
Arizona	Y	12 / week	30 hours / week	✓	
Arkansas	n.a. <sup>a</sup>			n.a. <sup>b</sup>	
California	N			d.k.	
Colorado	n.a. <sup>a</sup>			n.a. <sup>b</sup>	
Connecticut	N			✓	
Delaware	Y	24 / month	No requirement	✓	✓
District of Columbia	Y	48/month	No requirement	✓	
Florida	Y	12 / month	No requirement	✓	✓
Georgia	n.a. <sup>a</sup>			n.a. <sup>b</sup>	
Hawaii	Y	No requirement	16 hours / month	✓	✓
Idaho	Y	No requirement	24 hours / 2 months	✓	
Illinois	Y	20 / month	12 hours / month	✓	
Indiana	Y	10 / week	No requirement	✓	✓
Iowa	Y	No requirement	No requirement	✓	✓
Kansas	n.a. <sup>a</sup>			n.a. <sup>b</sup>	
Kentucky	Y	12 / month	No requirement	✓	
Louisiana	n.a. <sup>a</sup>			n.a. <sup>b</sup>	
Maine	n.a. <sup>a</sup>			n.a. <sup>b</sup>	
Maryland	N				
Massachusetts	n.a. <sup>a</sup>			n.a. <sup>b</sup>	
Michigan	n.a. <sup>a</sup>			n.a. <sup>b</sup>	
Minnesota	Y	15 / week	No requirement	✓	✓
Mississippi	N				
Missouri	n.a. <sup>a</sup>			n.a. <sup>b</sup>	
Montana	n.a. <sup>a</sup>			n.a. <sup>b</sup>	
Nebraska	Y	No requirement	8 hours / day	✓	
Nevada	Y	10 / 2 weeks	No requirement	✓	
New Hampshire	Y	6 / week	No requirement	✓	✓
New Jersey	Y	No requirement	30 hours / week	✓	
New Mexico	n.a. <sup>a</sup>			n.a. <sup>b</sup>	
New York	N			✓	
North Carolina	Y	3 / week <sup>b</sup>	No requirement	✓	✓
North Dakota	n.a. <sup>a</sup>			n.a. <sup>b</sup>	
Ohio	n.a. <sup>a</sup>			n.a. <sup>b</sup>	
Oklahoma	n.a. <sup>a</sup>			n.a. <sup>b</sup>	
Oregon	Y	No requirement	5 hours / week	✓	
Pennsylvania	n.a. <sup>a</sup>			n.a. <sup>b</sup>	
Rhode Island	Y	24 / 2 months	No requirement	✓	
South Carolina	N			✓	
South Dakota	N			✓	
Tennessee	Y	12 / month	12 hours / month	✓	
Texas	Y	12 / month	No requirement	✓	
Utah	Y	No requirement	No requirement	✓	
Vermont	Y	12 / week	20 hours / week	✓	✓
Virginia	n.a. <sup>a</sup>			n.a. <sup>b</sup>	
Washington	Y	5 / week	40 hours / month	✓	
West Virginia	Y	18/week in urban areas and 12 / month in rural areas	No requirement	✓	
Wisconsin	Y	No requirement	12 hours / month <sup>c</sup>	✓	
Wyoming	Y	No requirement	30 hours / week	✓	

SOURCE: State E&T Managers Survey.

n.a. = Not applicable.

<sup>a</sup> State does not offer job search to ABAWDs.

<sup>b</sup> In North Carolina, policy varies by county. It can be two contacts per week in higher unemployment areas.

<sup>c</sup> In Wisconsin, it is recommended, but not required.

<sup>d</sup> Includes one-on-one counseling every two weeks or participation in job club.

TABLE D5

## POLICY ON WHEN ABAWDs ARE REQUIRED TO CONDUCT JOB SEARCH, FY99

State	Statewide Policy?	Policy			While Or After Completing Another E&T Component
		When First Applying For Food Stamps	After Eligibility Determination	After Referral To E&T	
Alabama	Y			✓	
Alaska	Y	✓			
Arizona	Y	✓			
Arkansas	n.a. <sup>a</sup>				
California	N				
Colorado	n.a. <sup>a</sup>				
Connecticut	N				
Delaware	Y		✓		
District of Columbia	Y		✓		
Florida	Y		✓		
Georgia	n.a. <sup>a</sup>				
Hawaii	Y		✓		
Idaho	Y	✓			
Illinois	Y		✓		
Indiana	Y				✓ <sup>b</sup>
Iowa	Y				✓ <sup>c</sup>
Kansas	n.a. <sup>a</sup>				
Kentucky	Y		✓		
Louisiana	n.a. <sup>a</sup>				
Maine	n.a. <sup>a</sup>				
Maryland	N				
Massachusetts	n.a. <sup>a</sup>				
Michigan	n.a. <sup>a</sup>				
Minnesota	Y		✓		
Mississippi	N				
Missouri	n.a. <sup>a</sup>				
Montana	n.a. <sup>a</sup>				
Nebraska	Y	✓			
Nevada	Y			✓	
New Hampshire	Y				✓
New Jersey	Y		✓		
New Mexico	n.a. <sup>a</sup>				
New York	N				
North Carolina	Y			✓	
North Dakota	n.a. <sup>a</sup>				
Ohio	n.a. <sup>a</sup>				
Oklahoma	n.a. <sup>a</sup>				
Oregon	Y		✓		
Pennsylvania	n.a. <sup>a</sup>				
Rhode Island	Y		✓		
South Carolina	N				
South Dakota	N				
Tennessee	Y		✓		
Texas	Y		✓		
Utah	Y		✓		
Vermont	Y	✓			
Virginia	n.a. <sup>a</sup>				
Washington	Y		✓		
West Virginia	Y		✓		
Wisconsin	Y		✓		
Wyoming	Y			✓	

SOURCE: State E&amp;T Managers Survey.

<sup>a</sup> State does not offer job search to ABAWDs.<sup>b</sup> In Indiana, ABAWDs are only in job search if they are already completing 20 hours/week in a qualified work activity or if they are in Community Work Experience.<sup>c</sup> In Iowa, job search is required after job club or job search training.

TABLE D6

## LENGTH OF JOB SEARCH REQUIRED OF ABAWDs, FY99

State	Statewide Policy?	Length of Job Search		
		One Month Or Less	Between One and Two Months	Until They Find a Job/Until They Begin Another E&T Component
Alabama	Y	✓		
Alaska	Y			✓
Arizona	Y	✓		
Arkansas	n.a. <sup>a</sup>			
California	N			
Colorado	n.a. <sup>a</sup>			
Connecticut	N			
Delaware	Y	✓		
District of Columbia	Y <sup>b</sup>			
Florida	Y			✓
Georgia	n.a. <sup>a</sup>			
Hawaii	Y		✓	
Idaho	Y		✓	
Illinois	Y		✓	
Indiana	Y		✓	
Iowa	Y	✓		
Kansas	n.a. <sup>a</sup>			
Kentucky	Y	✓		
Louisiana	n.a. <sup>a</sup>			
Maine	n.a. <sup>a</sup>			
Maryland	N			
Massachusetts	n.a. <sup>a</sup>			
Michigan	n.a. <sup>a</sup>			
Minnesota	Y		✓	
Mississippi	N			
Missouri	n.a. <sup>a</sup>			
Montana	n.a. <sup>a</sup>			
Nebraska	Y		✓	
Nevada	Y	✓		
New Hampshire	Y	✓		
New Jersey	Y	✓		
New Mexico	n.a. <sup>a</sup>			
New York	N			
North Carolina	Y		✓	
North Dakota	n.a. <sup>a</sup>			
Ohio	n.a. <sup>a</sup>			
Oklahoma	n.a. <sup>a</sup>			
Oregon	Y	✓		
Pennsylvania	n.a. <sup>a</sup>			
Rhode Island	Y		✓	
South Carolina	N			
South Dakota	N			
Tennessee	Y	✓		
Texas	Y	✓		
Utah	Y			✓
Vermont	Y		✓	
Virginia	n.a. <sup>a</sup>			
Washington	Y	✓		
West Virginia	Y	✓		
Wisconsin	Y	✓		
Wyoming	Y		✓	

SOURCE: State E&amp;T Managers Survey.

n.a. = Not applicable.

<sup>a</sup> State does not offer job search to ABAWDs.<sup>b</sup> In the District of Columbia, job search takes place between two and three months.

TABLE D7

## ASSISTANCE OFFERED IN JOB SEARCH, FY99

State	Names of Potential Employers	Access to Telephones to Contact Employers	Access to Word Processors or Typewriters
Alabama	✓	✓	✓
Alaska		✓	✓
Arizona	✓	✓	✓
Arkansas			
California	d.k.	d.k.	d.k.
Colorado			
Connecticut	✓	✓	✓
Delaware			
District of Columbia	✓	✓	✓
Florida	✓	✓	✓
Georgia			
Hawaii	✓	✓	✓
Idaho	✓	✓	✓
Illinois	✓	✓	✓
Indiana	✓		✓
Iowa	✓	✓	✓
Kansas			
Kentucky		✓	
Louisiana			
Maine			
Maryland <sup>a</sup>			
Massachusetts			
Michigan			
Minnesota	✓	✓	✓
Mississippi	✓	✓	✓
Missouri			
Montana			
Nebraska		✓	✓
Nevada	✓	✓	✓
New Hampshire	✓	✓	✓
New Jersey	✓	✓	✓
New Mexico			
New York	✓	✓	✓
North Carolina	✓	✓	✓
North Dakota			
Ohio			
Oklahoma			
Oregon	✓	✓	✓
Pennsylvania			
Rhode Island			
South Carolina			
South Dakota	✓	✓	✓
Tennessee	✓	✓	✓
Texas	✓	✓	✓
Utah	✓	✓	✓
Vermont	✓	✓	✓
Virginia			
Washington	✓	✓	✓
West Virginia	✓		
Wisconsin	✓	✓	✓
Wyoming	✓	✓	✓

SOURCE: State E&T Managers Survey.

d.k. = Respondent didn't know.

<sup>a</sup> In Maryland, the nature of the job search component is decided by the local

TABLE D8

## EXTENT TO WHICH ABAWDS ARE REQUIRED TO CONDUCT JOB SEARCH TRAINING, FY99

State	Is Job Search Training Required Of At Least Some Food Stamp E&T Mandatory Participants?	Is Job Search Training Required Of At Least Some ABAWDS?	Is Job Search Training Offered In Any Areas That Are Not Waived From The ABAWD Provisions?			Is Job Search Training Offered In Any Areas That Are Waived From The ABAWD Provisions?		
			In All Areas	Only In Areas	Some	In All Areas	Only In Areas	Some
Alabama	N	N						
Alaska	Y	Y			√ <sup>a</sup>			
Arizona	Y	Y	√			√		
Arkansas	Y	N						
California	Y	Y			√			
Colorado	Y	N						
Connecticut	Y	Y			√			√
Delaware	N	N						
District of Columbia	Y	N						
Florida	Y	Y			√			√
Georgia	N	N						
Hawaii	Y	Y			√	√		
Idaho	Y	Y	√			√		
Illinois	Y	Y						√
Indiana	Y	Y	√			√		
Iowa	Y	Y			√			
Kansas	Y	N						
Kentucky	N	N						
Louisiana	Y	Y	√					√
Maine	Y	Y			√			
Maryland	Y	Y	√					√
Massachusetts	Y	N						
Michigan	Y	Y	√					
Minnesota	Y	Y	√			√		
Mississippi	Y	Y	√					
Missouri	Y	N						
Montana	Y	N						
Nebraska	Y	Y			√			
Nevada	Y	Y	√					
New Hampshire	Y	Y	√					
New Jersey	Y	Y	√			√		
New Mexico	Y	N						
New York	Y	Y	√					√
North Carolina	Y	Y			√			
North Dakota	Y	Y			√			
Ohio	Y	N						
Oklahoma	N	N						
Oregon	Y	Y			√			
Pennsylvania	Y	Y	√			√		
Rhode Island	N	N						
South Carolina	Y	Y	√			√		
South Dakota	Y	Y			√			√
Tennessee	Y	Y			√			√
Texas	Y	Y			√			√
Utah	Y	Y	√			√		
Vermont	Y	Y	√					
Virginia	Y	N						
Washington	Y	Y	√					
West Virginia	Y	Y			√			√
Wisconsin	Y	Y			√			
Wyoming	Y	Y			√			

SOURCE: State E&amp;T Managers Survey.

<sup>a</sup> Depends on the season. Waivers are seasonal.

TABLE D9

## NATURE OF JOB SEARCH TRAINING PROGRAM OFFERED TO FOOD STAMP E&amp;T

State	Resume Writing	Interview Skills	Time Management Skills	Money Management Skills	Soft Skills	Other <sup>d</sup>
Alabama	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>
Alaska	✓	✓	✓	✓	✓	✓
Arizona	✓	✓	✓	✓	✓	✓
Arkansas	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>
California <sup>b</sup>						
Colorado	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>
Connecticut	✓	✓	✓		✓	
Delaware	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>
District of Columbia	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>
Florida	✓	✓	✓	✓	✓	✓
Georgia	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>
Hawaii	✓	✓	✓	✓	✓	✓
Idaho	✓	✓	✓	✓	✓	✓
Illinois	✓	✓	✓	✓	✓	
Indiana	✓	✓	✓		✓	✓
Iowa	✓	✓	d.k.	d.k.	d.k.	✓
Kansas	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>
Kentucky	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>
Louisiana	✓	✓	✓	✓	✓	✓
Maine	✓	d.k.	d.k.	d.k.	d.k.	✓
Maryland	✓	✓	✓	✓	✓	
Massachusetts	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>
Michigan <sup>c</sup>						✓
Minnesota	✓	✓		✓	✓	✓
Mississippi	✓	✓	✓	✓	✓	✓
Missouri	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>
Montana	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>
Nebraska	✓	✓	✓	✓	✓	
Nevada	✓	✓	✓		✓	✓
New Hampshire	✓	✓	✓		✓	
New Jersey	✓	✓	✓	✓	✓	✓
New Mexico	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>
New York <sup>b</sup>						
North Carolina <sup>b</sup>						
North Dakota	✓	✓	✓		✓	✓
Ohio	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>
Oklahoma	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>
Oregon	✓	✓	✓	✓	✓	
Pennsylvania	✓	✓	✓	✓	✓	
Rhode Island	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>
South Carolina	✓	✓	✓	✓	✓	
South Dakota	✓	✓	✓		✓	✓
Tennessee	✓	✓	✓	✓	✓	✓
Texas	✓	✓			✓	✓
Utah	✓	✓	✓	✓	✓	✓
Vermont	✓	✓	✓	✓	✓	
Virginia	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>
Washington	✓	✓	✓	✓	✓	✓
West Virginia	✓	✓			✓	
Wisconsin	✓	✓	✓	✓	✓	
Wyoming	✓	✓	✓		✓	✓

SOURCE: State E&amp;T Managers Survey.

<sup>a</sup> State does not offer job search training programs to ABAWDs.<sup>b</sup> In California, New York and North Carolina, the nature of the program is decided at the<sup>c</sup> In Michigan, job search training is individualized to the needs of the client.<sup>d</sup> Includes assessment testing, life skills, job retention skills, discussion of relocation, interview practice, anger management, personal hygiene and appearance.



TABLE D10

## WORK-RELATED SUPPORTIVE SERVICES OFFERED TO ABAWDS, FY99

State	Transportation Reimbursement	Financial Assistance for Dependent	Clothing for Job Interview	Assistance for Purchase of Work Supplies or Uniforms	Payment for Employment-Related Licensing or Testing	Payment for Other Education-Related Testing	One Time Emergency Assistance	Other <sup>a</sup>
Alabama	✓		✓	✓	✓	✓		
Alaska	✓		✓	✓	✓	✓		✓
Arizona	✓	✓	✓	✓	✓	✓		✓
Arkansas								
California	✓	✓						
Colorado	✓	✓	✓	✓	✓	✓		✓
Connecticut	✓	✓						
Delaware	✓	✓						
District of Columbia	✓	✓	✓					✓
Florida	✓	✓	✓					
Georgia	✓		✓	✓	✓	✓		✓
Hawaii	✓	✓						
Idaho	✓	✓	✓	✓	✓	✓		
Illinois	✓	✓	✓	✓	✓	✓		✓
Indiana	✓	✓	✓	✓	✓	✓		✓
Iowa	✓	✓						
Kansas								
Kentucky	✓		✓	✓	✓	✓		
Louisiana	✓	✓		✓				
Maine	✓	✓	✓	✓	✓	✓	✓	
Maryland	✓	✓	✓	✓				
Massachusetts	✓							
Michigan	✓	✓	✓	✓	✓	✓		
Minnesota	✓	✓	✓	✓	✓	✓	✓	
Mississippi	✓							
Missouri	✓	✓		✓		✓		✓
Montana								
Nebraska	✓	✓	✓	✓	✓			
Nevada	✓	✓	✓	✓	✓	✓		
New Hampshire	✓							
New Jersey	✓	✓						
New Mexico	✓	✓						
New York	✓	✓	✓	✓	✓			
North Carolina	✓	✓		✓	✓	✓		
North Dakota								
Ohio	✓	✓	✓	✓	✓	✓		✓
Oklahoma								
Oregon	✓	✓	✓	✓	✓			
Pennsylvania	✓	✓	✓	✓	✓	✓		✓
Rhode Island	✓	✓						
South Carolina	✓			✓		✓		✓
South Dakota	✓	✓	✓	✓	✓	✓		✓
Tennessee	✓	✓				✓		
Texas	✓	✓				✓		
Utah	✓	✓	✓	✓	✓	✓		
Vermont	✓	✓						
Virginia	✓	✓	✓	✓	✓	✓		✓
Washington	✓	✓	✓	✓	✓	✓		
West Virginia	✓							
Wisconsin	✓	✓	✓	✓	✓	✓	✓	✓
Wyoming	✓	✓						

SOURCE: State E&amp;T Managers Survey.

<sup>a</sup>Includes some medical and dental services, drug rehabilitation, resume preparation and duplication, and assistance with cost of drivers licenses, drivers tests, police clearances, vehicle repair, car insurance, books and supplies.

TABLE D11

## FOOD STAMP E&amp;T QUALIFYING SERVICES OFFERED TO ABAWDs, FY99

State	Workfare	Other Work Program	Self-Employment Program	Vocational Training	Education	Job Search In JTPA or TAA Programs <sup>a</sup>	Job Search Training In JTPA or TAA Programs <sup>a</sup>
Alabama	✓					✓	✓
Alaska						✓	✓
Arizona	✓			✓	✓	✓	✓
Arkansas	✓ <sup>b</sup>						
California	✓			✓	✓	✓	
Colorado	✓		✓	✓	✓	✓	✓
Connecticut	✓	✓		✓	✓	✓	✓
Delaware	✓					✓	✓
District of Columbia	✓			✓	✓		
Florida	✓			✓	✓		✓
Georgia	✓			✓	✓		
Hawaii		✓	✓	✓	✓		
Idaho	✓			✓	✓		
Illinois	✓			✓	✓	✓	
Indiana	✓	✓		✓	✓	✓	✓
Iowa							
Kansas						✓	✓
Kentucky	✓			✓			
Louisiana	✓			✓	✓	✓	
Maine	✓	✓		✓	✓	✓	✓
Maryland				✓	✓		
Massachusetts	✓						
Michigan	✓				✓	✓	✓
Minnesota	✓	✓		✓	✓	✓	✓
Mississippi	✓			✓	✓		
Missouri				✓	✓	✓	✓
Montana						✓	✓
Nebraska	✓					✓	✓
Nevada	✓						
New Hampshire	✓		✓	✓	✓		
New Jersey	✓			✓	✓	✓	✓
New Mexico		✓		✓	✓	✓	✓
New York	✓	✓		✓	✓		
North Carolina	✓			✓	✓		
North Dakota				✓	✓		
Ohio	✓		✓	✓	✓		
Oklahoma							
Oregon	✓	✓		✓		✓	✓
Pennsylvania	✓	✓		✓	✓	✓	✓
Rhode Island							
South Carolina	✓	✓		✓	✓		
South Dakota	✓	✓			✓		
Tennessee	✓			✓	✓		
Texas	✓	✓		✓	✓	✓	
Utah	✓			✓	✓		
Vermont	✓						
Virginia	✓			✓			
Washington	✓				✓	✓	✓
West Virginia	✓			✓	✓		
Wisconsin	✓		✓	✓	✓	✓	✓
Wyoming						✓	✓

SOURCE: State E&T Managers Survey and State Food Stamp Program Director Survey.

<sup>a</sup> These states responded that job search and/or job search assistance in JTPA and TAA programs met the work requirements in March 2000. Such information was not provided for FY99.

<sup>b</sup> Arkansas only offers workfare through the optional workfare program in two counties.

TABLE D12

## JOB SEARCH AND JOB SEARCH TRAINING IN JTPA PROGRAMS AND TAA PROGRAMS, 2000

State	Job Search				Job Search Training			
	Job Search Meets Work Requirement				Job Search Training Meets Work Requirement			
	Part of JTPA and/or TAA?	No State-Wide Policy	Policy varies by county or local office	Meets Work Requirement ?	Part of JTPA and/or TAA?	No State-Wide Policy	Policy varies by county or local office	Meets Work Requirement ?
Alabama	Y			Y	Y			Y
Alaska	Y			Y	Y			Y
Arizona	Y			Y	Y			Y
Arkansas	N				N			
California	Y			Y	Y	✓	N	
Colorado	Y			Y	Y			Y
Connecticut	Y			Y	Y			Y
Delaware	Y			Y	Y			Y
District of Columbia	n.a.							
Florida	Y			N	Y			Y
Georgia	N				N			
Hawaii	N				N			
Idaho	N				N			
Illinois	Y			Y	N			
Indiana	Y			Y	Y			Y
Iowa	N				N			
Kansas	Y			Y	Y			Y
Kentucky	N				N			
Louisiana	Y			Y	N			
Maine	Y			Y	Y			Y
Maryland	N				N			
Massachusetts	N				N			
Michigan	Y			Y	Y			Y
Minnesota	Y			Y	Y			Y
Mississippi	N				N			
Missouri	Y			Y	Y			Y
Montana	Y			Y	Y			Y
Nebraska	Y			Y	Y			Y
Nevada	N				N			
New Hampshire	N				N			
New Jersey	Y			Y	Y			Y
New Mexico	Y			Y	Y			Y
New York	Y	✓	d.k.			✓	d.k.	
North Carolina	N				N			
North Dakota	N				N			
Ohio	Y			N	Y			N
Oklahoma	N				N			
Oregon	Y			Y	Y			Y
Pennsylvania	Y			Y	Y			Y
Rhode Island	Y	✓	N		N			
South Carolina	N				N			
South Dakota	N				N			
Tennessee	N				Y			N
Texas	Y			Y	N			
Utah	N				N			
Vermont	Y			N	Y			N
Virginia	N				N			
Washington	Y			Y	Y			Y
West Virginia	N				N			
Wisconsin	Y			Y	Y			Y
Wyoming	Y			Y	Y			Y

SOURCE: State Food Stamp Program Director Survey.

d.k. = Respondent didn't know.

n.a. = Not applicable.

TABLE D13

## EXTENT TO WHICH WORKFARE PROGRAM IS OFFERED TO ABAWDs, FY99

State	Does The State Have A Workfare Program?	Is The Workfare Program Offered To At Least Some ABAWDs?	Is Workfare Component Offered In Any Areas That Are Not Waived From The ABAWD Provisions?		Is Workfare Component Offered In Any Areas That Are Waived From The ABAWD Provisions?	
			In All Areas	Only In Some Areas	In All Areas	Only In Some Areas
Alabama	Y	Y		✓		✓
Alaska	N	N				
Arizona	Y	Y		✓		
Arkansas	N	N				
California	Y	Y		✓		
Colorado	Y	Y		✓		
Connecticut	Y	Y	✓		✓	
Delaware	Y	Y	✓			
District of Columbia	Y	Y			✓	
Florida	Y	Y		✓		✓
Georgia	Y	Y	✓			✓
Hawaii	N	N				
Idaho	Y	Y	✓		✓	
Illinois	Y	Y			✓	
Indiana	Y	Y		✓		✓
Iowa	N	N				
Kansas	Y	N				
Kentucky	Y	Y	✓			
Louisiana	Y	Y	✓			✓
Maine	Y	Y		✓		
Maryland	Y	Y	✓		✓ <sup>a</sup>	
Massachusetts	Y	Y	✓			
Michigan	Y	Y	✓			
Minnesota	Y	Y	✓		✓	
Mississippi	Y	Y	✓			
Missouri	N	N				
Montana	N	N				
Nebraska	Y	Y	✓			
Nevada	Y	Y	✓			
New Hampshire	Y	Y	✓			
New Jersey	Y	Y	✓		✓	
New Mexico	Y	Y	✓		✓	
New York	Y	Y	✓			✓
North Carolina	Y	Y		✓		
North Dakota	Y	Y		✓		
Ohio	Y	Y	✓			
Oklahoma	N	N				
Oregon	Y	Y	✓			
Pennsylvania	Y	Y	✓		✓	
Rhode Island	N	N				
South Carolina	Y	Y	✓		✓	
South Dakota	Y	Y	✓			✓
Tennessee	Y	Y		✓		✓
Texas	Y	Y		✓		✓
Utah	Y	Y	✓		✓	
Vermont	Y	Y	✓			
Virginia	Y	Y		✓		✓
Washington	Y	Y	✓			
West Virginia	Y	Y		✓		✓
Wisconsin	Y	Y	✓			
Wyoming	N	N				

SOURCE: State E&amp;T Managers Survey.

<sup>a</sup> In Maryland, workfare is available in all Food Stamp offices, but none of the waived counties are utilizing it.

TABLE D14

## FOOD STAMP WORKFARE REQUIREMENT FOR ABAWDs AND SLOT AVAILABILITY, FY99

State	ABAWDs Are Required To Take Prearranged Slots	ABAWDs Are Required To Find Their Own Workfare Slot	ABAWDs Are Required To Take A Prearranged Slot Or Find Their Own Slot	Is There A Prearranged Workfare Slot For Every ABAWD Who Wants One?
Alabama			✓	N
Alaska				n.a. <sup>a</sup>
Arizona	✓			N
Arkansas				n.a. <sup>a</sup>
California			✓	N
Colorado	✓			N
Connecticut		✓		n.a. <sup>b</sup>
Delaware	✓			Y
District of Columbia			✓	N <sup>a</sup>
Florida			✓	N
Georgia	✓			Y
Hawaii				n.a. <sup>a</sup>
Idaho	✓			Y
Illinois			✓	N
Indiana			✓	N
Iowa				n.a. <sup>a</sup>
Kansas				n.a. <sup>a</sup>
Kentucky			✓	Y
Louisiana			✓	Y
Maine			✓	N
Maryland			✓	Y
Massachusetts			✓	Y
Michigan			✓	Y
Minnesota	✓			Y
Mississippi	✓			Y
Missouri				n.a. <sup>a</sup>
Montana				n.a. <sup>a</sup>
Nebraska	✓			Y
Nevada	✓			Y
New Hampshire	✓			Y
New Jersey	✓			Y
New Mexico			✓	Y
New York	✓			Y
North Carolina			✓	N
North Dakota			✓	N
Ohio			✓	Y
Oklahoma				n.a. <sup>a</sup>
Oregon			✓	Y
Pennsylvania			✓	N
Rhode Island				n.a. <sup>a</sup>
South Carolina	✓			d.k.
South Dakota			✓	Y
Tennessee			✓	N
Texas			✓	N
Utah	✓			Y
Vermont	✓			Y
Virginia			✓	d.k.
Washington	✓			Y
West Virginia		✓		n.a. <sup>b</sup>
Wisconsin	✓			N
Wyoming				n.a. <sup>a</sup>

SOURCE: State E&T Managers Survey.

d.k. = Respondent didn't know.

n.a. = Not applicable.

<sup>a</sup> State does not offer workfare to ABAWDs.

<sup>b</sup> State does not offer prearranged workfare slots.

TABLE D15

## JOB SEARCH AND JOB SEARCH TRAINING IN WORKFARE OR OTHER WORK PROGRAMS, 2000

State	Job Search Component					Job Search Training			
	State Has Workfare Or Other Work Program?	As Part Of Workfare Or Work Program?	Job Search Meets Work Requirement			As Part of Work Fare or Work Experience?	Job Search Training Meets Work Requirement		
			No State-Wide Policy	Policy varies by Locality	Meets Work Requirement ?		No State-Wide Policy	Policy varies by county or local office	Meets Work Requirement ?
Alabama	Y	Y			Y	N			
Alaska	N								
Arizona	Y	N				N			
Arkansas	Y <sup>a</sup>	Y	✓	N		N			
California	Y	Y			Y	Y			Y
Colorado	Y	Y			Y	Y			Y
Connecticut	Y	N				N			
Delaware	Y	Y			Y	Y			Y
District of Columbia	n.a.								
Florida	Y	Y			Y	Y			Y
Georgia	Y	N				N			
Hawaii	Y <sup>a</sup>	Y			Y	Y	✓	N	
Idaho	Y	N				N			
Illinois	Y	Y			Y	Y			Y
Indiana	Y	Y			Y	Y			Y
Iowa	Y <sup>a</sup>	Y			Y	N			
Kansas	N <sup>b</sup>								
Kentucky	Y	Y			Y	N			
Louisiana	Y	Y			Y	Y			Y
Maine	Y	N				N			N
Maryland	Y	Y			Y	Y			Y
Massachusetts	Y	N				N			
Michigan	Y	Y			Y	Y			Y
Minnesota	Y	Y			N	N			
Mississippi	Y	N				N			
Missouri	N								
Montana	Y <sup>a</sup>	Y			Y	Y			Y
Nebraska	Y	Y			Y	Y			Y
Nevada	N <sup>c</sup>								
New Hampshire	Y	N				N			
New Jersey	Y	N				N			
New Mexico	Y	Y			Y	Y			Y
New York	Y	Y	✓	Y <sup>d</sup>		N			
North Carolina	Y	Y			N	Y			N
North Dakota	Y	N				Y	✓	Y <sup>e</sup>	N
Ohio	Y	N				N			
Oklahoma	N								
Oregon	Y	Y			Y	N			
Pennsylvania	Y	Y			Y	Y			Y
Rhode Island	N								
South Carolina	Y	Y			Y	N			
South Dakota	Y	Y			Y	Y			Y
Tennessee	Y	Y			N	N			
Texas	Y	Y			Y	N			
Utah	Y	N				Y			N
Vermont	Y	Y	✓	N		Y	✓	N	
Virginia	Y	N				N			
Washington	Y	Y			Y	Y			Y
West Virginia	Y	N				N			
Wisconsin	Y	Y			Y	Y			Y
Wyoming	N								

SOURCE: State Food Stamp Program Director Survey.

n.a. = Not applicable.

<sup>a</sup>Respondent reported workfare was available in 2000, but respondent to state E&T Managers Survey reported no workfare in FY99.<sup>b</sup>Kansas has workfare but it is not offered to ABAWDS.<sup>c</sup>Nevada recently discontinued its workfare program.<sup>d</sup>Policy varies by locality. State does not know if a common policy exists.<sup>e</sup>Policy varies by locality. Policy shown is the most common policy.

TABLE D16

## POLICY ON HOW LONG AN ABAWD CAN REMAIN IN WORKFARE, 1999

State	Statewide Policy?	Policy	
		Limit	No Limit
Alabama	Y		✓
Alaska	n.a. <sup>a</sup>		
Arizona	Y	6 months out of 12	
Arkansas	n.a. <sup>a</sup>		
California	N		
Colorado	Y		✓
Connecticut	Y		✓
Delaware	Y		✓
District of Columbia	Y <sup>a</sup>	3 months	
Florida	Y		✓
Georgia	Y		✓
Hawaii	n.a. <sup>a</sup>		
Idaho	Y	Reassess after 13 weeks	
Illinois	Y		✓
Indiana	Y		✓
Iowa	n.a. <sup>a</sup>		
Kansas	n.a. <sup>a</sup>		
Kentucky	Y		✓
Louisiana	Y		✓
Maine	Y		✓
Maryland	n.a. <sup>a</sup>		
Massachusetts	Y	33 / 36 months	
Michigan	Y		✓
Minnesota	N		
Mississippi	Y		✓
Missouri	n.a. <sup>a</sup>		
Montana	n.a. <sup>a</sup>		
Nebraska	Y		✓
Nevada	Y	6 months	
New Hampshire	Y		✓
New Jersey	Y		✓
New Mexico	n.a. <sup>a</sup>		
New York	Y		✓
North Carolina	Y		✓
North Dakota	n.a. <sup>a</sup>		
Ohio	Y		✓
Oklahoma	n.a. <sup>a</sup>		
Oregon	N		
Pennsylvania	Y		✓
Rhode Island	n.a. <sup>a</sup>		
South Carolina	Y		✓
South Dakota	Y		✓
Tennessee	Y	Reassess after 6 months	
Texas	Y		✓
Utah	Y		✓
Vermont	Y	2 months	
Virginia	Y		✓
Washington	Y		✓
West Virginia	Y		✓
Wisconsin	Y		✓
Wyoming	n.a. <sup>a</sup>		

SOURCE: State E&T Managers Survey.

n.a. = Not applicable.

<sup>a</sup> State does not offer workfare to ABAWDs.

TABLE D17

## POLICY ON WHEN ABAWDs BEGIN PARTICIPATION IN WORKFARE, FY99

State	Statewide Policy?	Policy							
		After Application	After Eligibility Is Determined	In The Second Month Of Time Limit	In The Third Month Of Time	Only After Their Time Limit Is Over	After Job Search	After Job Search Training	Other
Alabama	Y								
Alaska	n.a. <sup>a</sup>							✓	
Arizona	Y	✓							
Arkansas	n.a. <sup>a</sup>								
California	N								
Colorado	Y							✓	
Connecticut	N								
Delaware	Y							✓	
District of Columbia	Y			✓					
Florida	Y		✓						
Georgia	Y		✓						
Hawaii	n.a. <sup>a</sup>								
Idaho	Y								✓ <sup>d</sup>
Illinois	Y		✓						
Indiana	Y							✓	
Iowa	n.a. <sup>a</sup>								
Kansas	n.a. <sup>a</sup>								
Kentucky	Y							✓	
Louisiana	Y		✓						
Maine	Y	✓ <sup>b</sup>				✓ <sup>b</sup>			
Maryland	n.a. <sup>a</sup>								
Massachusetts	Y		✓						
Michigan	Y	✓ <sup>c</sup>							✓ <sup>c</sup>
Minnesota	N								
Mississippi	N								
Missouri	n.a. <sup>a</sup>								
Montana	n.a. <sup>a</sup>								
Nebraska	Y			✓					
Nevada	N								
New Hampshire	Y							✓	
New Jersey	N								
New Mexico	n.a. <sup>a</sup>								
New York	Y		✓						
North Carolina	Y		✓						
North Dakota	n.a. <sup>a</sup>		✓						
Ohio	Y	✓							
Oklahoma	n.a. <sup>a</sup>								
Oregon	Y							✓	
Pennsylvania	Y		✓						
Rhode Island	n.a. <sup>a</sup>								
South Carolina	N								
South Dakota	Y		✓						
Tennessee	Y								✓
Texas	Y							✓	
Utah	Y						✓		
Vermont	Y							✓	
Virginia	Y		✓						
Washington	Y						✓		
West Virginia	Y					✓			
Wisconsin	N								
Wyoming	n.a. <sup>a</sup>								

SOURCE: State E&amp;T Managers Survey.

n.a. = Not applicable.

<sup>a</sup> State does not offer workfare to ABAWDs.<sup>b</sup> ABAWDs begin the regular workfare program after application or they can wait until the time limit is ending.<sup>c</sup> ABAWDs begin the regular workfare program after application and self-initiated community service after job search training.<sup>d</sup> In Idaho, the policy was not specified.



TABLE D18

## EXTENT TO WHICH EDUCATION PROGRAMS ARE OFFERED TO ABAWDS, FY99

State	Does The State Have An Education Program?	Is The Education Program Offered To At Least Some ABAWDS?	Is the Education Component Offered In Any Areas That Are Not Waived From The ABAWD Provisions?		Is the Education Component Offered In Any Areas That Are Waived From The ABAWD Provisions?	
			In All Areas	In Some Areas	In All Areas	In Some Areas
Alabama	N	N				✓
Alaska	N	N				✓ <sup>a</sup>
Arizona	Y	Y		✓		
Arkansas	Y	N				
California	Y	Y		✓		
Colorado	Y	Y		✓		
Connecticut	Y	Y		✓		✓
Delaware	Y	N				
District of Columbia	Y	Y			✓	
Florida	Y	Y		✓		✓
Georgia	Y	Y	✓			✓
Hawaii	Y	Y	✓		✓	
Idaho	Y	Y	✓		✓	
Illinois	Y	Y				✓
Indiana	Y	Y	✓		✓	
Iowa	N	N				
Kansas	Y	N				
Kentucky	N	N				
Louisiana	Y	Y	✓			✓
Maine	Y	Y	✓			
Maryland	Y	Y	✓			✓
Massachusetts	N	N				
Michigan	Y	Y	✓			
Minnesota	Y	Y	✓		✓	
Mississippi	Y	Y	✓			
Missouri	Y	Y		✓		✓
Montana	Y	N				
Nebraska	N	N				
Nevada	N	N				
New Hampshire	Y	Y	✓			
New Jersey	Y	Y	✓		✓	
New Mexico	Y	Y	✓		✓	
New York	Y	Y	✓			✓
North Carolina	Y	Y		✓		
North Dakota	Y	Y	✓			
Ohio	Y	Y	✓			
Oklahoma	Y	N				
Oregon	N	N				
Pennsylvania	Y	Y	✓		✓	
Rhode Island	N	N				
South Carolina	Y	Y	✓		✓	
South Dakota	Y	Y		✓		✓
Tennessee	Y	Y	✓			✓
Texas	Y	Y		✓		✓
Utah	Y	Y	✓		✓	
Vermont	Y	Y	d.m.	d.m.	d.m.	d.m.
Virginia	Y	N				
Washington	Y	Y	✓			
West Virginia	Y	Y		✓		✓
Wisconsin	Y	Y	✓			
Wyoming	N	N				

SOURCE: State E&amp;T Managers Survey.

d.m.=Data Missing.

<sup>a</sup> For Alaska, these answers can change depending on the season. Waivers are only in effect during months of high unemployment. No area is exempt for the work requirement year-round.

TABLE D19

## EXTENT TO WHICH VOCATIONAL TRAINING IS OFFERED TO ABAWDS, FY99

State	Does The State Have A Vocational Training Program?	Is The Vocational Training Program Offered To At Least Some ABAWDS?	Is Vocational Training Offered In Any Areas That Are Not Waived From The ABAWD Provisions?		Is Vocational Training Offered In Any Areas That Are Waived From The ABAWD Provisions?	
			In All Areas	In Some Areas	In All Areas	In Some Areas
Alabama	N	N				
Alaska	N	N				
Arizona	Y	Y	✓			
Arkansas	Y	N				
California	Y	Y		✓		
Colorado	Y	Y		✓		
Connecticut	Y	Y		✓		
Delaware	Y	N				✓
District of Columbia	Y	Y			✓	
Florida	Y	Y		✓		✓
Georgia	Y	Y	✓			✓
Hawaii	Y	Y	✓		✓	
Idaho	Y	Y	✓		✓	
Illinois	Y	Y				✓
Indiana	Y	Y	✓		✓	
Iowa	N	N				
Kansas	Y	N				
Kentucky	Y	Y	✓			
Louisiana	Y	Y	✓			✓
Maine	Y	Y	✓		✓	
Maryland	Y	Y	✓		✓	
Massachusetts	N	N				
Michigan	N	N				
Minnesota	Y	Y	✓		✓	
Mississippi	Y	Y	✓			
Missouri	Y	Y	✓		✓	
Montana	Y	N				
Nebraska	N	N				
Nevada	N	N				
New Hampshire	Y	Y	✓			
New Jersey	Y	Y	✓		✓	
New Mexico	Y	Y	✓		✓	
New York	Y	Y	✓			✓
North Carolina	Y	Y		✓		
North Dakota	Y	Y	✓			
Ohio	Y	Y	✓			
Oklahoma	Y	N				
Oregon	Y	Y	✓			
Pennsylvania	Y	Y	✓		✓	
Rhode Island	N	N				
South Carolina	Y	Y	✓		✓	
South Dakota	N	N				
Tennessee	Y	Y	✓			✓
Texas	Y	Y		✓		✓
Utah	Y	Y	✓		✓	
Vermont	Y	Y <sup>a</sup>	d.m.	d.m.	d.m.	d.m.
Virginia	Y	Y		✓		✓
Washington	Y	N				
West Virginia	Y	Y		✓		✓
Wisconsin	Y	Y	✓			
Wyoming	N	N				

SOURCE: State E&amp;T Managers Survey.

d.m.= Data Missing.

<sup>a</sup> Vermont offers vocational services but few clients participate in these services

TABLE D20

SLOTS AVAILABLE IN EDUCATION AND VOCATIONAL TRAINING PROGRAMS FOR ABAWDs,  
FY99

State	Is There A Slot In An Education Program For All ABAWDs Who Want Them? <sup>a</sup>	Is There A Slot In Vocational Training For All ABAWDs Who Want Them? <sup>a</sup>
Alabama	n.a. <sup>a</sup>	n.a. <sup>a</sup>
Alaska	n.a. <sup>a</sup>	n.a. <sup>a</sup>
Arizona	N	Y
Arkansas	n.a. <sup>a</sup>	N
California	d.k. <sup>b</sup>	d.k.
Colorado	N	N
Connecticut	N	N
Delaware	n.a. <sup>a</sup>	n.a. <sup>a</sup>
District of Columbia	Y	N
Florida	N	N
Georgia	Y	Y
Hawaii	Y	Y
Idaho	N	Y
Illinois	Y	Y
Indiana	Y	Y
Iowa	n.a. <sup>a</sup>	n.a. <sup>a</sup>
Kansas	n.a. <sup>a</sup>	n.a. <sup>a</sup>
Kentucky	n.a. <sup>a</sup>	Y
Louisiana	N	N
Maine	N	N
Maryland	Y	Y
Massachusetts	n.a. <sup>a</sup>	n.a. <sup>a</sup>
Michigan	Y	n.a. <sup>a</sup>
Minnesota	Y	Y
Mississippi	Y	Y
Missouri	N	N
Montana	n.a. <sup>a</sup>	n.a. <sup>a</sup>
Nebraska	n.a. <sup>a</sup>	n.a. <sup>a</sup>
Nevada	n.a. <sup>a</sup>	n.a. <sup>a</sup>
New Hampshire	Y	Y
New Jersey	Y	Y
New Mexico	Y	Y
New York	d.k. <sup>b</sup>	d.k.
North Carolina	N	N
North Dakota	Y	N
Ohio	Y	Y
Oklahoma	n.a. <sup>a</sup>	n.a. <sup>a</sup>
Oregon	n.a. <sup>a</sup>	Y
Pennsylvania	N	N
Rhode Island	n.a. <sup>a</sup>	n.a. <sup>a</sup>
South Carolina	d.k.	d.k.
South Dakota	N	n.a. <sup>a</sup>
Tennessee	Y	Y
Texas	N	N
Utah	Y	Y
Vermont	d.m.	d.m.
Virginia	n.a. <sup>a</sup>	d.k.
Washington	Y	n.a. <sup>a</sup>
West Virginia	N	N
Wisconsin	Y	Y
Wyoming	n.a. <sup>a</sup>	n.a. <sup>a</sup>

SOURCE: State E&amp;T Managers Survey.

d.k. = Respondent didn't know.

d.m. = Data missing.

n.a. = Not applicable.

<sup>a</sup> State does not offer education/vocational training programs to ABAWDs.<sup>b</sup> Varies by county.

TABLE D21

## NATURE OF EDUCATION PROGRAM OFFERED TO FOOD STAMP E&amp;T PARTICIPANTS BY STATE, FY99

State	Classes to Help Clients Obtain a High School or GED Diploma	Basic Skills Training	English as a Second Language	Literacy classes	Adult Basic Education	Secondary and Post-Secondary Education	Driver's Education
Alabama	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>
Alaska	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>
Arizona	✓	✓	✓				
Arkansas	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>
California	✓	✓	✓				
Colorado	✓	✓	✓	✓		✓	
Connecticut	✓		✓		✓		
Delaware	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>
District of Columbia	✓	✓ <sup>a</sup>					✓
Florida	✓	✓	✓				
Georgia	✓	✓	✓				
Hawaii	✓	✓	✓				
Idaho	✓	✓	✓				
Illinois	✓	✓	✓				
Indiana	✓	✓	✓				
Iowa	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>
Kansas	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>
Kentucky	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>
Louisiana							
Maine	✓	✓	✓				
Maryland	✓	✓	✓	✓			
Massachusetts	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>
Michigan	✓	✓	✓				
Minnesota	✓	✓	✓				
Mississippi	✓	✓					
Missouri	✓	✓	✓				
Montana	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>
Nebraska	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>
Nevada	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>
New Hampshire	✓	✓	✓				
New Jersey	✓	✓	✓				
New Mexico	✓	✓	✓			✓	
New York	✓	✓	✓			✓	
North Carolina	✓	✓	✓				
North Dakota	d.m.	d.m.	d.m.	d.m.	d.m.	d.m.	d.m.
Ohio	✓	✓	✓		✓	✓	
Oklahoma	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>
Oregon	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>
Pennsylvania	✓		✓		✓		
Rhode Island	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>
South Carolina	✓	✓					
South Dakota	✓	✓					
Tennessee	✓	✓	✓				
Texas	✓	✓	✓	✓		✓	
Utah	✓	✓	✓				
Vermont	d.m.	d.m.	d.m.	d.m.	d.m.	d.m.	d.m.
Virginia	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>
Washington	✓	✓	✓				
West Virginia	✓	✓	✓			✓	
Wisconsin	✓	✓	✓				✓
Wyoming	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>	n.a. <sup>b</sup>

SOURCE: State E&amp;T Managers Survey.

d.m. = Data missing  
n.a. = Not applicable.<sup>a</sup> The District of Columbia offers computer programming, computer repair, clerical skills training, hotel training, culinary arts, nursing aides, home aides, training to be taxi cab drivers<sup>b</sup> State does not offer education programs to ABAWDs.

TABLE D22

NATURE OF VOCATIONAL TRAINING COMPONENT OFFERED TO FOOD STAMP  
E&T PARTICIPANTS BY STATE, FY99

State	Classroom Training	On-the-Job Training	JTPA	Community Colleges	Employment Counselors
Alabama	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>
Alaska	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>
Arizona	✓				
Arkansas	✓	✓			
California	✓	✓			
Colorado	✓				
Connecticut	✓	✓			
Delaware	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>
District of Columbia	✓	✓			
Florida	✓	✓			
Georgia	✓	✓			
Hawaii	✓	✓			
Idaho	✓				
Illinois	✓				
Indiana	✓	✓			
Iowa	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>
Kansas	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>
Kentucky			✓		
Louisiana	d.k.	d.k.			
Maine	✓	d.k.			
Maryland	✓	✓			
Massachusetts	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>
Michigan	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>
Minnesota	✓	✓			
Mississippi	✓	✓		✓	
Missouri	✓	✓			
Montana	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>
Nebraska	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>
Nevada	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>
New Hampshire	✓	✓			
New Jersey	✓	✓			
New Mexico	✓				
New York	✓	✓			
North Carolina	✓	✓	✓	✓	
North Dakota	d.m.	d.m.	d.m.	d.m.	d.m.
Ohio	✓				
Oklahoma	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>
Oregon	✓	✓			
Pennsylvania	✓				
Rhode Island	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>
South Carolina	✓	✓			
South Dakota	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>
Tennessee	✓				
Texas	✓	✓			
Utah	✓				
Vermont	d.m.	d.m.	d.m.	d.m.	d.m.
Virginia	✓				
Washington	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	✓	n.a. <sup>a</sup>
West Virginia	✓				
Wisconsin	✓	✓			
Wyoming	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>	n.a. <sup>a</sup>

SOURCE: State E&amp;T Managers Survey.

d.m.= Data missing  
n.a. = Not applicable.<sup>a</sup> State does not offer vocational training to ABAWDs.

TABLE D23

## POLICY ON HOW LONG AN ABAWD CAN REMAIN IN EDUCATION, 1999

State	Statewide Policy?	Policy		
		Months	No Limit	Other
Alabama	n.a. <sup>a</sup>			
Alaska	n.a. <sup>a</sup>			
Arizona	Y		✓	
Arkansas	n.a. <sup>a</sup>			
California	N			
Colorado	N			
Connecticut	Y		✓	
Delaware	n.a. <sup>a</sup>			
District of Columbia	Y	12		
Florida	Y			Depends on client's needs
Georgia	N			
Hawaii	Y	4		
Idaho	Y		✓	
Illinois	Y			Varies depending on education program participant joins
Indiana	Y		✓	
Iowa	n.a. <sup>a</sup>			
Kansas	n.a. <sup>a</sup>			
Kentucky	n.a. <sup>a</sup>			
Louisiana	Y		✓	
Maine	Y	6		
Maryland	N			
Massachusetts	n.a. <sup>a</sup>			
Michigan	Y		✓	
Minnesota	N			
Mississippi	Y	24		
Missouri	Y		✓	
Montana	n.a. <sup>a</sup>			
Nebraska	n.a. <sup>a</sup>			
Nevada	n.a. <sup>a</sup>			
New Hampshire	Y			Contingent on individual curriculum
New Jersey	Y		✓	
New Mexico	Y		✓	
New York	Y		✓ <sup>b</sup>	
North Carolina	Y			Limitation as long as class lasts
North Dakota	d.m.			
Ohio	N			
Oklahoma	n.a. <sup>a</sup>			
Oregon	n.a. <sup>a</sup>			
Pennsylvania	Y		✓	
Rhode Island	n.a. <sup>a</sup>			
South Carolina	N			
South Dakota	Y		✓	
Tennessee	Y		✓	
Texas	N			
Utah	Y		✓	
Vermont	d.m.			
Virginia	n.a. <sup>a</sup>			
Washington	Y		✓	
West Virginia	Y	3 <sup>c</sup>		
Wisconsin	Y			Left to the discretion of counties
Wyoming	n.a. <sup>a</sup>			

SOURCE: State E&T Managers Survey.

d.m.= Data missing.  
n.a. = Not applicable.

<sup>a</sup> State does not offer education programs to ABAWDs.

<sup>b</sup> In New York, there is a limit of two years for post-secondary education.

<sup>c</sup> In West Virginia, the limit can be longer if the client is working.

TABLE D24

## POLICY ON HOW LONG AN ABAWD CAN REMAIN IN VOCATIONAL TRAINING, FY99

State	Statewide Policy?	Policy		
		Months	No Limit	Other
Alabama	n.a. <sup>a</sup>			
Alaska	n.a. <sup>a</sup>			
Arizona	Y		✓	
Arkansas	n.a. <sup>a</sup>			
California	N			
Colorado	N			
Connecticut	Y		✓	
Delaware	n.a. <sup>a</sup>			
District of Columbia	Y	3 <sup>b</sup>		
Florida	Y		✓	
Georgia	Y			Length of class
Hawaii	Y			Length of class
Idaho	Y		✓	
Illinois	Y	6		
Indiana	Y	12		
Iowa	n.a. <sup>a</sup>			
Kansas	n.a. <sup>a</sup>			
Kentucky	Y			Same as JTPA limit
Louisiana	Y		✓	
Maine	Y	6		
Maryland	Y		✓	
Massachusetts	n.a. <sup>a</sup>			
Michigan	n.a. <sup>a</sup>			
Minnesota	Y		✓	
Mississippi	Y			Length of class
Missouri	Y		✓	
Montana	n.a. <sup>a</sup>			
Nebraska	n.a. <sup>a</sup>			
Nevada	n.a. <sup>a</sup>			
New Hampshire	Y		✓	
New Jersey	Y		✓	
New Mexico	Y	24		
New York	N			
North Carolina	Y		✓	
North Dakota	d.m.			
Ohio	N			
Oklahoma	n.a. <sup>a</sup>			
Oregon	Y			Duration of activity
Pennsylvania	Y	6 <sup>c</sup>		
Rhode Island	n.a. <sup>a</sup>			
South Carolina	N			
South Dakota	n.a. <sup>a</sup>			
Tennessee	Y		✓	
Texas	N			
Utah	Y		✓	
Vermont	d.m.			
Virginia	Y		✓	
Washington	n.a. <sup>a</sup>			
West Virginia	Y	12		
Wisconsin	Y			"Short term"
Wyoming	n.a. <sup>a</sup>			

SOURCE: State E&amp;T Managers Survey.

d.m. = Data missing

n.a. = Not applicable.

<sup>a</sup> State does not offer vocational training to ABAWDs.<sup>b</sup> In the District of Columbia, this limit can be longer.<sup>c</sup> In Pennsylvania, the time limit is sometimes a year.

TABLE D25

## POLICY ON WHEN ABAWDs SHOULD BE OFFERED A QUALIFYING E&amp;T SLOT, FY99

State	Statewide Policy?	Timing of Services					
		When They First Apply	During The First Month or After They Are Found Eligible And Subject To Time Limits	During The Second Month	During The Third Month	After They Have Exhausted The Three	At Another Time <sup>a</sup>
Alabama	Y		✓				
Alaska	Y	✓					
Arizona	Y		✓				
Arkansas	n.a. <sup>b</sup>						
California	Y		✓				
Colorado	Y	✓					
Connecticut	Y	✓					
Delaware	Y		✓				
District of Columbia	n.a. <sup>b</sup>						
Florida	Y		✓				
Georgia	Y		✓				
Hawaii	Y				✓		
Idaho	Y		✓				
Illinois	n.a. <sup>b</sup>						
Indiana	Y		✓				
Iowa	n.a. <sup>c</sup>						
Kansas	n.a. <sup>c</sup>						
Kentucky	Y		✓				
Louisiana	Y		✓				
Maine	Y	✓					
Maryland	Y						✓
Massachusetts	Y		✓				
Michigan	Y						✓
Minnesota	Y		✓				
Mississippi	Y		✓				
Missouri	Y	✓					
Montana	n.a. <sup>c</sup>						
Nebraska	Y		✓				
Nevada	Y		✓				
New Hampshire	Y			✓			
New Jersey	Y		✓				
New Mexico	Y		✓				
New York	Y		✓				
North Carolina	Y		✓				
North Dakota	Y		✓				
Ohio	Y	✓					
Oklahoma	n.a. <sup>c</sup>						
Oregon	Y		✓				
Pennsylvania	Y		✓				
Rhode Island	n.a. <sup>d</sup>						
South Carolina	Y					✓	
South Dakota	Y	✓					
Tennessee	Y		✓				
Texas	Y	✓					
Utah	Y		✓				
Vermont	Y	✓					
Virginia	Y		✓ <sup>e</sup>	✓ <sup>e</sup>			
Washington	Y	✓					
West Virginia	Y		✓				
Wisconsin	Y		✓				
Wyoming	n.a. <sup>e</sup>						

SOURCE: State E&amp;T Managers Survey .

n.a. = Not applicable.

<sup>a</sup> Includes within the first three months and if not still employed after 30 days of job search.<sup>b</sup> In Arkansas, Illinois and the District of Columbia, there are no ABAWDs, subject to the work requirement.<sup>c</sup> Kansas, Montana, and Oklahoma do not offer E&T services to ABAWDs.<sup>d</sup> Iowa, Rhode Island and Wyoming do not offer qualifying E&T services to ABAWDs.<sup>e</sup> In Virginia, the policy is either the first month or the second month. It depends on how long it takes to process and send the notices.



TABLE D26

## AVAILABILITY OF QUALIFYING E&amp;T WORK

State	ABAWD Qualifying E&T Work Activities Available In All Non-waived Offices For ABAWDs Who Have Used Up Their Three Month Limit
Alabama	
Alaska	
Arizona	✓
Arkansas	
California	
Colorado	
Connecticut	
Delaware	✓
District of Columbia	
Florida	
Georgia	✓
Hawaii	
Idaho	✓
Illinois	
Indiana	✓
Iowa	
Kansas	
Kentucky	✓
Louisiana	✓
Maine	✓
Maryland	✓
Massachusetts	✓
Michigan	✓
Minnesota	
Mississippi	✓
Missouri	✓
Montana	
Nebraska	✓
Nevada	✓
New Hampshire	✓
New Jersey	✓
New Mexico	✓
New York	
North Carolina	
North Dakota	
Ohio	✓
Oklahoma	
Oregon	✓
Pennsylvania	✓
Rhode Island	
South Carolina	✓
South Dakota	✓
Tennessee	✓
Texas	
Utah	✓
Vermont	✓
Virginia	
Washington	✓
West Virginia	✓
Wisconsin	✓
Wyoming	

SOURCE: State E&T Managers Survey.

<sup>a</sup> A qualifying E&T slot may include a work component, education, or training, or job search or job search training as part of JTPA/TAA.

<sup>b</sup> As of October 1999, Montana offers qualifying E&T to all ABAWDs. As of 2000, participation of job search and job search training as part of JTPA and TAA

TABLE D27

## PLANNED AND ACTUAL FEDERAL FOOD STAMP E&amp;T FUNDING BY STATE, FY99

State	Percent of Federal Funds State Planned To Draw			Percent of Federal Funds State Actually Drew	Plans to Change Expenditure in FY00
	20% or less	Between 20% and 99%	100%		
Alabama			✓	23	✓
Alaska	✓			20	
Arizona		✓		47	
Arkansas	✓			14	
California			✓	73	✓
Colorado			✓	100	
Connecticut		✓		46	
Delaware		d.k.	d.k.	33	
District of Columbia			✓	12	✓
Florida		✓		82	
Georgia			✓	39	✓
Hawaii		✓		16	✓
Idaho	✓			20	
Illinois			✓	93	✓
Indiana		✓		6	✓
Iowa	✓			20	
Kansas	✓			20	
Kentucky		d.k.	d.k.	34	
Louisiana		✓		26	
Maine		✓		73	
Maryland			✓	13	✓
Massachusetts		✓		14	✓
Michigan		d.k.	d.k.	11	
Minnesota			✓	73	✓
Mississippi			✓	62	✓
Missouri		✓		7	✓
Montana	✓			56	✓
Nebraska			✓	63	✓
Nevada		✓		21	
New Hampshire			✓	21	✓
New Jersey			✓	100	
New Mexico		✓		27	
New York			✓	40	✓
North Carolina			✓	6	✓
North Dakota			✓	44	✓
Ohio			✓	73	✓
Oklahoma	✓			14	
Oregon		✓		43	
Pennsylvania			✓	24	✓
Rhode Island	✓			16	
South Carolina			✓	93	✓
South Dakota		d.k.	d.k.	80	
Tennessee		✓		29	
Texas		d.k.	d.k.	64	
Utah		d.k.	d.k.	52	
Vermont		✓		42	
Virginia			✓	21	✓
Washington			✓	68	✓
West Virginia		✓		15	✓
Wisconsin		✓		30	
Wyoming	✓			21	✓

SOURCE: State E&amp;T Managers Survey and Botsko et al. (2000).

d.k. = Respondent didn't know.

TABLE D28

## REASONS FOR DRAWING LESS THAN 100% FROM FEDERAL FOOD STAMP E&amp;T GRANT BY STATE, FY99

State	Not Enough ABAWDs to Spend All the Money	Too Few ABAWDs Are Filling Available Slots	Problems with E&T Requirements	No FS E&T Program In Many Offices Or Local E&T Program Does Not Provide Enough Slots	Unable To Provide The Support Services That Are Needed	Does Not Want To Spend More Money On ABAWDs	ABAWDs Can Receive These Services in JTPA
Alabama							
Alaska						✓	
Arizona	✓	✓					
Arkansas					✓		
California							
Colorado							
Connecticut			✓	✓			
Delaware							
Dist. of Col.							
Florida	✓	✓					
Georgia							
Hawaii	✓						
Idaho		✓	✓				
Illinois							
Indiana	✓	✓					
Iowa		✓	✓				
Kansas							✓
Kentucky							
Louisiana		✓					
Maine	✓						
Maryland							
Massachusetts		✓					
Michigan							
Minnesota							
Mississippi							
Missouri			✓	✓			
Montana	✓						
Nebraska						✓	
Nevada	✓	✓					
New Hampshire							
New Jersey							
New Mexico	✓						
New York							
North Carolina							
North Dakota							
Ohio							
Oklahoma			✓	✓			
Oregon	✓	✓	✓				
Pennsylvania							
Rhode Island			✓				
South Carolina							
South Dakota							
Tennessee		✓	✓				
Texas							
Utah							
Vermont	✓	✓	✓				
Virginia	✓	✓					
Washington							
West Virginia		✓	✓				
Wisconsin			✓				
Wyoming	✓						

SOURCE: State E&amp;T Managers Survey.

TABLE D29

## PERCENTAGE OF ABAWD E&amp;T SLOTS FILLED IN NON-WAIVED AREAS, FY99

State	ABAWD E&T Slots Filled In Non-Waived Areas	ABAWD E&T Slots Offered But Not Filled In Non-Waived Areas	Filled And Offered E&T Slots In Non-Waived Areas	Percentage Of E&T Slots That Are Filled In Non-Waived Areas
U.S. Totals	662,842	252,324	915,166	72%
Alabama	2,780	0	2,780	100%
Alaska	0	0	0	n.a.
Arizona	179	223	402	45%
Arkansas	0	0	0	n.a.
California	293,922	58,109	352,031	83%
Colorado	11,984	215	12,199	98%
Connecticut	271	543	814	33%
Delaware	25	145	170	15%
District of Columbia	0	0	0	n.a.
Florida	2,425	4,850	7,275	33%
Georgia	4,782	2,931	7,713	62%
Hawaii	201	174	375	54%
Idaho	136	12	148	92%
Illinois	93	5	98	95%
Indiana	601	387	988	61%
Iowa	0	0	0	n.a.
Kansas	0	0	0	n.a.
Kentucky	1,278	551	1,829	70%
Louisiana	784	293	1,077	73%
Maine	19	1,258	1,277	1%
Maryland	175	184	359	49%
Massachusetts	931	1,166	2,097	44%
Michigan	1,437	15	1,452	99%
Minnesota	4,430	10,071	14,501	31%
Mississippi	3,414	986	4,400	78%
Missouri	445	508	953	47%
Montana	0	0	0	n.a.
Nebraska	359	1,872	2,231	16%
Nevada	65	231	296	22%
New Hampshire	1,710	0	1,710	100%
New Jersey	64,106	42,681	106,787	60%
New Mexico	3	16	19	16%
New York	214,540	21,120	235,660	91%
North Carolina	588	878	1,466	40%
North Dakota	21	10	31	68%
Ohio	22,737	1,077	23,814	95%
Oklahoma	0	0	0	n.a.
Oregon	2,315	57,697	60,012	4%
Pennsylvania	1,132	0	1,132	100%
Rhode Island	0	0	0	n.a.
South Carolina	5,147	6,844	11,991	43%
South Dakota	601	4,156	4,757	13%
Tennessee	3,158	9,498	12,656	25%
Texas	5,472	10,403	15,875	34%
Utah	1,736	1,622	3,358	52%
Vermont	626	675	1,301	48%
Virginia	140	294	434	32%
Washington	4,176	10,450	14,626	29%
West Virginia	2,115	0	2,115	100%
Wisconsin	1,719	174	1,893	91%
Wyoming	64	0	64	100%

SOURCE: FNS-583.

TABLE D30

## PERCENTAGE OF ABAWD WORKFARE SLOTS FILLED IN NON-WAIVED AREAS, FY99

State	ABAWD Workfare Slots Filled In Non-Waived Areas	ABAWD Workfare Slots Offered But Not Filled In Non-Waived Areas	Filled And Offered Workfare Slots In Non-Waived Areas	Percentage Of Workfare Slots That Are Filled In Non-Waived Areas
U.S. Totals	577,117	209,912	787,029	73%
Alabama	2,780	0	2,780	100%
Alaska	0	0	0	n.a.
Arizona	142	171	313	45%
Arkansas	0	0	0	n.a.
California	273,296	56,023	329,319	83%
Colorado	9,598	60	9,658	99%
Connecticut	91	211	302	30%
Delaware	25	145	170	15%
District of Columbia	0	0	0	n.a.
Florida	1,694	3,310	5,004	34%
Georgia	3,566	2,074	5,640	63%
Hawaii	0	0	0	n.a.
Idaho	70	11	81	86%
Illinois	93	5	98	95%
Indiana	276	238	514	54%
Iowa	0	0	0	n.a.
Kansas	0	0	0	n.a.
Kentucky	1,261	551	1,812	70%
Louisiana	447	212	659	68%
Maine	17	609	626	3%
Maryland	0	0	0	n.a.
Massachusetts	931	1,166	2,097	44%
Michigan	1,391	15	1,406	99%
Minnesota	737	4,634	5,371	14%
Mississippi	3,063	986	4,049	76%
Missouri	0	0	0	n.a.
Montana	0	0	0	n.a.
Nebraska	359	1,872	2,231	16%
Nevada	65	231	296	22%
New Hampshire	1,649	0	1,649	100%
New Jersey	21,019	21,381	42,400	50%
New Mexico	0	0	0	n.a.
New York	214,300	21,000	235,300	91%
North Carolina	470	764	1,234	38%
North Dakota	0	0	0	n.a.
Ohio	21,063	959	22,022	96%
Oklahoma	0	0	0	n.a.
Oregon	2,225	57,555	59,780	4%
Pennsylvania	33	0	33	100%
Rhode Island	0	0	0	n.a.
South Carolina	1,324	1,752	3,076	43%
South Dakota	551	3,555	4,106	13%
Tennessee	2,271	7,969	10,240	22%
Texas	5,275	10,346	15,621	34%
Utah	962	1,089	2,051	47%
Vermont	217	266	483	45%
Virginia	66	153	219	30%
Washington	4,167	10,441	14,608	29%
West Virginia	0	0	0	n.a.
Wisconsin	1,623	158	1,781	91%
Wyoming	0	0	0	n.a.

SOURCE: FNS-583

TABLE D31

## PERCENTAGE OF ABAWD EDUCATION AND TRAINING SLOTS FILLED IN NON-WAIVED AREAS, FY99

State	ABAWD Education		Filled And Offered Education And Training Slots In Non-Waived Areas	Percentage Of Total Slots That Are Filled In Non-Waived Areas
	ABAWD Education And Training Slots Filled In Non-Waived Areas	And Training Slots Offered But Not Filled In Non-Waived Areas		
U.S. Totals	85,725	42,412	128,137	67%
Alabama	0	0	0	n.a.
Alaska	0	0	0	n.a.
Arizona	37	52	89	42%
Arkansas	0	0	0	n.a.
California	20,626	2,086	22,712	91%
Colorado	2,386	155	2,541	94%
Connecticut	180	332	512	35%
Delaware	0	0	0	n.a.
District of Columbia	0	0	0	n.a.
Florida	731	1,540	2,271	32%
Georgia	1,216	857	2,073	59%
Hawaii	201	174	375	54%
Idaho	66	1	67	99%
Illinois	0	0	0	n.a.
Indiana	325	149	474	69%
Iowa	0	0	0	n.a.
Kansas	0	0	0	n.a.
Kentucky	17	0	17	100%
Louisiana	337	81	418	81%
Maine	2	649	651	0%
Maryland	175	184	359	49%
Massachusetts	0	0	0	n.a.
Michigan	46	0	46	100%
Minnesota	3,693	5,437	9,130	40%
Mississippi	351	0	351	100%
Missouri	445	508	953	47%
Montana	0	0	0	n.a.
Nebraska	0	0	0	n.a.
Nevada	0	0	0	n.a.
New Hampshire	61	0	61	100%
New Jersey	43,087	21,300	64,387	67%
New Mexico	3	16	19	16%
New York	240	120	360	67%
North Carolina	118	114	232	51%
North Dakota	21	10	31	68%
Ohio	1,674	118	1,792	93%
Oklahoma	0	0	0	n.a.
Oregon	90	142	232	39%
Pennsylvania	1,099	0	1,099	100%
Rhode Island	0	0	0	n.a.
South Carolina	3,823	5,092	8,915	43%
South Dakota	50	601	651	8%
Tennessee	887	1,529	2,416	37%
Texas	197	57	254	78%
Utah	774	533	1,307	59%
Vermont	409	409	818	50%
Virginia	74	141	215	34%
Washington	9	9	18	50%
West Virginia	2,115	0	2,115	100%
Wisconsin	96	16	112	86%
Wyoming	64	0	64	100%

SOURCE: FNS-583

**APPENDIX E**

**ADMINISTERING THE ABAWD POLICIES, STATE POLICIES AND PROCEDURES**

TABLE E1

## FIRST MONTH OF THREE-MONTH TIME LIMIT

State	State-Wide Policy?	First Month of Three-Month Limit				
		Month of Application	Month Case is Certified	First Month Benefits Received	Month Of Application Before Mid-Month	First Full Month of Benefits
Alabama	Y	✓				
Alaska	Y					✓
Arizona	Y					✓
Arkansas	Y					✓
California	Y					✓
Colorado	Y					✓
Connecticut	Y					✓
Delaware	Y					✓
District of Columbia	n.a.					
Florida	Y	✓				
Georgia	Y					✓
Hawaii	Y					✓
Idaho	Y					✓
Illinois	Y					✓
Indiana	Y					✓
Iowa	Y					✓
Kansas	Y					✓
Kentucky	Y			✓		
Louisiana	Y					✓
Maine	Y	✓				
Maryland	Y					✓
Massachusetts	Y					✓
Michigan	Y				✓	
Minnesota	Y					✓
Mississippi	Y					✓
Missouri	Y					✓
Montana	Y					✓
Nebraska	Y					✓
Nevada	Y					✓
New Hampshire	Y	✓				
New Jersey	Y	✓				
New Mexico	Y	✓				
New York	Y					✓
North Carolina	Y		✓			
North Dakota	Y				✓	
Ohio	Y					✓
Oklahoma	Y			✓		
Oregon	Y					✓
Pennsylvania	Y					✓
Rhode Island	Y					✓
South Carolina	Y					✓
South Dakota	Y					✓
Tennessee	Y			✓		
Texas	Y				✓	
Utah	Y					✓
Vermont	Y					✓
Virginia	Y			✓		
Washington	Y					✓
West Virginia	Y					✓
Wisconsin	Y					✓
Wyoming	Y					✓

SOURCE: State Food Stamp Program Director Survey.

n.a. = Not applicable.



TABLE E2  
DETERMINING THE 36-MONTH PERIOD

State	State-Wide Policy?	Rolling Clock	Fixed Clock	
			Same for All ABAWDs	Varies Among ABAWDs
Alabama	Y	✓		
Alaska	Y		✓	
Arizona	Y		✓	
Arkansas	Y		✓	
California	Y			✓
Colorado	Y		✓	
Connecticut	Y	✓		
District of Columbia	n.a.			
Delaware	Y	✓		
Florida	Y	✓		
Georgia	Y		✓	
Hawaii	Y	✓		
Idaho	Y		✓	
Illinois	Y	✓		
Indiana	Y	✓		
Iowa	Y	✓		
Kansas	Y		✓	
Kentucky	Y	✓		
Louisiana	Y	✓		
Maine	Y			✓
Maryland	Y		✓	
Massachusetts	Y		✓	
Michigan	Y		✓	
Minnesota	Y	✓		
Mississippi	Y	✓		
Missouri	Y	✓		
Montana	Y		✓	
Nebraska	Y	✓		
Nevada	Y	✓		
New Hampshire	Y	✓		
New Jersey	Y	✓		
New Mexico	Y	✓		
New York	Y	✓		
North Carolina	Y	✓		
North Dakota	Y	✓		
Ohio	Y	✓		
Oklahoma	Y	✓		
Oregon	Y		✓	
Pennsylvania	Y		✓	
Rhode Island	Y			✓
South Carolina	Y		✓	
South Dakota	Y		✓	
Tennessee	Y		✓	
Texas	Y	✓		
Utah	Y	✓		
Vermont	Y	✓		
Virginia	Y			✓
Washington	Y		✓	
West Virginia	Y			✓
Wisconsin	Y		✓	
Wyoming	Y	✓		

SOURCE: State Food Stamp Program Director Survey.

n.a. = Not applicable.

TABLE E3

## SOPHISTICATION OF STATE TRACKING SYSTEMS

State	No State-Wide Automated Tracking System	Online Benefit History Available		
		Months of Receipt of Time-Limited Benefits Not Indicated	Months of Receipt of Time-Limited Benefits Indicated, Eligibility Not Determined Automatically	Months of Receipt of Time-Limited Benefits Indicated, Eligibility Determined Automatically
Alabama				✓
Alaska	✓			
Arizona				✓
Arkansas	✓			
California				✓
Colorado				✓
Connecticut		✓		
Delaware				✓
District of Columbia	✓			
Florida				✓
Georgia				✓
Hawaii				✓
Idaho		✓		
Illinois <sup>a</sup>				
Indiana				✓
Iowa	✓			
Kansas		✓		
Kentucky				✓
Louisiana				✓
Maine			✓	
Maryland		✓		
Massachusetts				✓
Michigan				✓
Minnesota				✓
Mississippi				✓
Missouri				✓
Montana	✓			
Nebraska	✓			
Nevada			✓	
New Hampshire	✓			
New Jersey	✓			
New Mexico				✓
New York	✓			
North Carolina	✓			
North Dakota				✓
Ohio				✓
Oklahoma		✓		
Oregon				✓
Pennsylvania			✓	
Rhode Island				✓
South Carolina	✓			
South Dakota				✓
Tennessee			✓	
Texas				✓
Utah	✓			
Vermont				✓
Virginia			✓	
Washington				✓
West Virginia				✓
Wisconsin			✓	
Wyoming			✓	

SOURCE: State Food Stamp Program Director Survey.

<sup>a</sup> Illinois did not track ABAWDs at the time of the survey, but does have tracking capabilities.

TABLE E4

## PROBLEMS ENCOUNTERED TRACKING FOOD STAMP RECEIPT IN OTHER LOCALITIES IN STATE

State	State Requires Caseworkers to Check for Prior Receipt In Other Localities In State	Type of Problems Encountered					
		Problems Encountered	Database Incorrect	Database Does Not Track ABAWDs for 36 Months	Difficulties Contacting Other Offices	Time Consuming	New System
Alabama	Y						
Alaska	Y	✓					✓
Arizona	Y						
Arkansas	Y						
California	Y						
Colorado	Y						
Connecticut	Y						
Delaware	Y						
District of Columbia	n.a.						
Florida	Y						
Georgia	Y						
Hawaii	Y	✓		✓			
Idaho	Y						
Illinois	Y	✓					✓
Indiana	Y						
Iowa	Y						
Kansas	Y						
Kentucky	Y						
Louisiana	Y						
Maine	Y						
Maryland	Y						
Massachusetts	Y						
Michigan	Y						
Minnesota	Y						
Mississippi	Y						
Missouri	Y						
Montana	Y	✓					✓
Nebraska	Y						
Nevada	Y						
New Hampshire	Y						
New Jersey	Y	✓			✓		
New Mexico	Y	✓	✓	✓			✓
New York	Y	✓			✓		
North Carolina	N	✓	✓	✓	✓	✓	
North Dakota	N						
Ohio	Y						
Oklahoma	Y						
Oregon	Y						
Pennsylvania	Y	✓				✓	
Rhode Island	Y						
South Carolina	Y						
South Dakota	Y						
Tennessee	Y						
Texas	Y						
Utah	Y						
Vermont	Y						
Virginia	Y						
Washington	Y						
West Virginia	Y						
Wisconsin	Y						
Wyoming	Y						

SOURCE: State Food Stamp Program Director Survey.

n.a. = Not applicable.

TABLE E5

## PROBLEMS ENCOUNTERED TRACKING FOOD STAMP RECEIPT IN OTHER STATES

State	State Requires Caseworkers to Check for Prior Receipt	Problems Encountered			
		Problems Encountered	Difficulties Contacting Office	Time Consuming	Information Not Available
Alabama	✓				
Alaska	✓	✓		✓	
Arizona	✓				
Arkansas					
California		✓			
Colorado	✓				
Connecticut	✓				
Delaware	✓				
District of Columbia					
Florida	✓				
Georgia	✓	✓	✓	✓	
Hawaii	✓				
Idaho	✓				
Illinois					
Indiana	✓	✓	✓		
Iowa	✓				
Kansas	✓				
Kentucky	✓	✓	✓		
Louisiana	✓				
Maine	✓				
Maryland		✓	✓	✓	
Massachusetts	✓				
Michigan	✓				
Minnesota	✓	✓	✓	✓	
Mississippi	✓	✓	✓	✓	
Missouri					
Montana	✓				
Nebraska	✓				
Nevada	✓	✓		✓	✓
New Hampshire	✓				
New Jersey	✓	✓		✓	
New Mexico	✓	✓	✓		
New York	✓				
North Carolina	✓	✓	✓	✓	
North Dakota	✓				
Ohio	✓				
Oklahoma	✓	✓	✓	✓	✓
Oregon	✓				
Pennsylvania	✓	✓	✓	✓	
Rhode Island	✓				
South Carolina	✓				
South Dakota	✓				
Tennessee	✓				
Texas					
Utah	✓				
Vermont	✓				
Virginia	✓				
Washington	✓				
West Virginia	✓				
Wisconsin	✓	✓	✓		
Wyoming	✓				

SOURCE: State Food Stamp Program Director Survey.

TABLE E6  
DIFFICULTIES USING 15 PERCENT EXEMPTION

State	Nature Of Difficulty				
	Experienced Difficulty Using 15% Exemption	Counties Do Not Know How To Implement	Estimating Size Of Group Affected	Tracking Exemptions	Time Consuming To Train Staff
Alabama					
Alaska					
Arizona	Y		✓		
Arkansas					
California	Y	✓			
Colorado					
Connecticut					
Delaware					
District of Columbia					
Florida					
Georgia					
Hawaii	Y				
Idaho					
Illinois					
Indiana					
Iowa					
Kansas					
Kentucky					
Louisiana					
Maine	Y				✓
Maryland					
Massachusetts					
Michigan					
Minnesota	Y		✓		
Mississippi					
Missouri					
Montana					
Nebraska					
Nevada					
New Hampshire					
New Jersey	Y			✓	
New Mexico					
New York					
North Carolina	Y			✓	
North Dakota					
Ohio					
Oklahoma					
Oregon					
Pennsylvania	Y		✓		
Rhode Island	Y				
South Carolina					
South Dakota					
Tennessee					
Texas					
Utah	Y		✓		
Vermont					
Virginia					
Washington					
West Virginia	Y			✓	
Wisconsin					
Wyoming					

SOURCE: State Food Stamp Program Director Survey.

TABLE E7  
PARTIALLY WAIVED AREAS

State	Offices With Partially-Waived Areas				
	Offices with Partially-Waived Areas?	Difficulties?	Explaining Rules to Clients	Tracking Street Address	Worker Confusion
Alabama	N				
Alaska	N				
Arizona	N				
Arkansas	Y				
California	Y	Y			
Colorado	Y				
Connecticut	Y	Y			✓
Delaware	n.a.				
District of Columbia	N				
Florida	N				
Georgia	Y				
Hawaii	N				
Idaho	Y				
Illinois	Y				
Indiana	Y				
Iowa	n.a.				
Kansas	n.a.				
Kentucky	Y				
Louisiana	Y	Y		✓	✓
Maine	Y	Y	✓	✓	✓
Maryland	N				
Massachusetts	n.a.				
Michigan	n.a.				
Minnesota	Y				
Mississippi	n.a.				
Missouri	N				
Montana	N				
Nebraska	N				
Nevada	Y				
New Hampshire	n.a.				
New Jersey	Y	Y		✓	
New Mexico	Y	Y	✓		
New York	Y				
North Carolina	n.a.				
North Dakota	N				
Ohio	n.a.				
Oklahoma	n.a.				
Oregon	n.a.				
Pennsylvania	Y				
Rhode Island	Y				
South Carolina	N				
South Dakota	Y				
Tennessee	Y				
Texas	N				
Utah	N				
Vermont	Y				
Virginia	N				
Washington	N				
West Virginia	N				
Wisconsin	n.a.				
Wyoming	Y				

SOURCE: State Food Stamp Program Director Survey.

n.a.= Not applicable

**APPENDIX F**

**DETERMINANTS OF THE PROPORTION OF ADULT FSP  
PARTICIPANTS SUBJECT TO THE TIME LIMIT**





The proportion of adults subject to the time limit varies from state to state. To what extent is this related to the variation in state ABAWD policies? We used multivariate analysis to test the relationship between policies on ABAWDs and the proportion of adult FSP participants who are subject to the ABAWD time limit. This appendix describes the methodology and results of this analysis.

The multivariate analysis was conducted in two steps. First, we ranked the individual state ABAWD policies as being “strict” or “lenient”. Next, we conducted regression analysis to determine the relationship between the state policies and the proportion of adults that are subject to the ABAWD time limit in each state.

#### **A. MEASURES OF STATE ABAWD POLICIES**

Of the state ABAWD policies discussed in Chapters III and IV, we identified six that will likely have the largest impact on the number of ABAWDs subject to the time limit in each state: (1) policy to certify an ABAWD as unfit for employment; (2) policy on exemption because of care of a dependent child; (3) use of ABAWD waivers; (4) use of the 15 percent exemption; (5) policy on how the three month time limit is defined; and (6) policy on tracking the three month time limit. For each state, we ranked each policy as either “strict,” “moderate” or “lenient” (Table F.1). All else being equal, a policy that is “strict” will result in more ABAWDs subject to the time limit, while a policy that is “lenient” will result in fewer ABAWDs subject to the time limit.

For the multivariate analysis, we created six distinct variables that reflect the ranking for each of these policies (Table F.2). Each of these variables takes on a value of 0 if the policy is strict, 1 if the policy is moderate and 2 if the policy is lenient. We also created an aggregate policy measure equal to the sum of the six individual policies. The minimum possible value for

TABLE F.1

## STATE POLICY RANKING CRITERIA

<b>Policy</b>	<b>Strict</b>	<b>Moderate</b>	<b>Lenient</b>
<b>Requirements for Disability Certification</b>	Clients can be certified based neither on caseworker observation nor on self-report	Clients can be certified based on caseworker observation but not self-report, or policies vary by county	Clients can be certified based on self-report
<b>Dependent Child Exemption</b>	Only one adult per household is exempt, or maximum age for dependent children is under 17	Multiple adults but not all adults exempt, and maximum age for dependent children is 17 or older	All adults exempt if a dependent child is in the household and maximum age for dependent children is 17 or older
<b>Waiver Use</b>	State does not use waivers	State uses waivers and the proportion of adult FSP participants in waived areas is below national median	State uses waivers, and the proportion of adult FSP participants in waived areas is above national median
<b>15 Percent Exemption Use</b>	State does not use 15 percent exemption	State uses 15 percent exemption, but uses less than 10 percent of its allotment	State uses 15 percent exemption and uses more than 10 percent of its allotment
<b>First Month of Time Limited Benefits</b>	First month is month of application	First month is month case is certified, first month any benefits are received, or month of application if before mid-month	First month is first full month of benefits
<b>Method of Tracking</b>	State uses a rolling clock	State uses a fixed clock that varies among ABAWDs	State uses a fixed clock that is the same for all ABAWDs

the aggregate measure is 0, an indication that all of the state's policies are strict; the maximum possible value is 12, an indication that all of the state's policies are lenient.

TABLE F.2

## STATE ABAWD POLICY RANKINGS

State	Requirements for Disability Certification <sup>a</sup>	Dependent Children Exemption <sup>a</sup>	Waiver Use <sup>a</sup>	15 Percent Exemption Use <sup>a</sup>	First Month of Time Limited Benefits <sup>a</sup>	Method of Tracking <sup>a</sup>	Aggregate Policy Measure <sup>b</sup>
Alabama	1	1	1	0	0	0	3
Alaska	2	0	2	1	2	2	7
Arizona	2	1	1	1	2	2	7
Arkansas	0	2	2	2	2	2	8
California	1	2	0	1	2	1	6
Colorado	1	2	1	1	2	2	7
Connecticut	0	2	2	1	2	0	7
Delaware	2	1	0	0	2	0	5
Florida	1	0	2	1	0	0	4
Georgia	2	1	2	1	2	2	8
Hawaii	2	2	1	1	2	0	8
Idaho	1	1	0	1	2	2	5
Illinois	2	2	2	2	2	0	10
Indiana	1	1	1	1	2	0	6
Iowa	0	2	0	0	2	0	4
Kansas	0	1	0	2	2	2	5
Kentucky	1	1	2	2	1	0	7
Louisiana	2	1	2	2	2	0	9
Maine	2	1	2	1	0	1	6
Maryland	1	1	2	2	2	2	8
Massachusetts	1	2	0	2	2	2	7
Michigan	2	2	0	0	1	2	5
Minnesota	0	1	1	2	2	0	6
Mississippi	1	1	0	2	2	0	6
Missouri	0	2	1	1	2	0	6
Montana	2	1	2	0	2	2	7
Nebraska	1	2	1	2	2	0	8
Nevada	0	1	1	1	2	0	5
New Hampshire	0	1	0	2	0	0	3
New Jersey	2	2	2	0	0	0	6
New Mexico	1	2	2	0	0	0	5
New York	1	0	1	1	2	0	5
North Carolina	2	1	0	2	1	0	6
North Dakota	1	2	1	0	1	0	5
Ohio	1	1	0	0	2	0	4
Oklahoma	2	2	0	0	1	0	5
Oregon	0	1	0	1	2	2	4
Pennsylvania	0	0	2	0	2	2	4
Rhode Island	0	0	2	0	2	0	4
South Carolina	1	1	1	1	2	2	6
South Dakota	2	2	2	0	2	2	8
Tennessee	1	1	1	1	1	2	5
Texas	2	1	1	0	1	0	5
Utah	0	2	1	2	2	0	7
Vermont	0	2	1	1	2	0	6
Virginia	1	2	1	0	1	1	5
Washington	1	1	2	2	2	2	8
West Virginia	1	2	2	1	2	1	8
Wisconsin	2	2	0	0	2	2	6
Wyoming	1	1	1	0	2	0	5

<sup>a</sup>A value of 0 indicates the policy is strict; a value of 1 indicates the policy is moderate; a value of 2 indicates the policy is lenient.

<sup>b</sup>Equals the sum of the six individual policy rankings.

## B. MULTIVARIATE ANALYSIS

To understand the impact of ABAWD policies on the number of ABAWDs in each state, we estimated the following model:

$$A_s = P_s \lambda + E_s \beta + L_s \psi + \varepsilon_s$$

where

- $A_s$  = the proportion of adults in nonwaived areas in state  $s$  who are ABAWDs subject to the time limit
- $P_s$  = vector of state ABAWD policies for state  $s$
- $E_s$  = vector of state economic conditions for state  $s$
- $L_s$  = estimated 1996 proportion of adults in state  $s$  that are ABAWDs

The dependent variable ( $A_s$ ) reflects the extent to which adult FSP participants in each state are subject to the ABAWD time limit. We restrict the analysis to nonwaived areas because no adults in waived areas are subject to the time limit. We exclude from the analysis Illinois and Arkansas for similar reasons – these states use their 15 percent exemption to exempt all adults from the time limit.

For the basic model, we include in the vector  $P_s$  the six state ABAWD policy rankings discussed above. We would expect policies that are more lenient to lead to a decrease in the proportion of adults that are subject to the time limit as lenient policies exclude more adults from the time limit (in other words, we expect the coefficients of the policy variables to be negative).

We also include two variables that measure the work activities and E&T services provided to ABAWDs. The first variable is the proportion of each state's allocation of federal E&T funds for ABAWDs that was spent. The second variable is a dummy variable indicating that the state provides qualifying work activities to ABAWDs who lost their eligibility and are no longer participating in the FSP. We expect states that spend more money on E&T to ABAWDs will have more ABAWDs receiving food stamps because more will meet the work requirement.

Similarly, states that provide qualifying work activities to nonparticipants will help nonparticipants regain eligibility and thus increase the proportion of adults that is ABAWDs.

We included in the vector  $E_s$  the state unemployment rate in 1999 and a dummy variable indicating that the proportion of the state population that lives in urban areas is in the 90<sup>th</sup> percentile of the national distribution. Given the complex relationship between economic conditions, waivers, work requirement rules and the time limit, it is unclear how the economic variables should affect the proportion of adults that is ABAWDs. For instance, high unemployment rates will lead more ABAWDs to participate in the FSP, but proportionately fewer will meet the work requirement and thus lose eligibility because of the time limit.

The results of the basic model show that policies have a small influence on the proportion of adults that are ABAWDs (Table F.3). The only two policies that have a statistically significant relationship with this measure are the states' use of waivers and the proportion of the states' allocation of E&T funding that was spent. The negative coefficient on the waiver policy variable suggests that states apply waivers to areas that contain a disproportionately high share of ABAWDs, and as a result, the nonwaived areas tend to have a disproportionately low share. It could be the case that states intentionally select for waivers areas with a high proportion of ABAWDs. Alternatively, it could be the case that the areas eligible for waivers – those with high unemployment rates – are also areas with high proportions of ABAWDs. The positive coefficient on the E&T funding variable suggests that states which spend more money on E&T have more adults subject to the time limit. This may occur because more ABAWDs are meeting the work requirement through E&T in these states, as opposed to losing eligibility.

Overall, this model explains little of the variation in state ABAWD populations. No other variables had a significant effect on the ABAWD population in the basic model. Neither the variation in state economic conditions nor the pre-welfare reform size of the ABAWD caseload

TABLE F.3  
RESULTS OF REGRESSION MODELS

	Model 1: Basic Model	Model 2: Aggregate Policy Measure	Model 3: PRA Measure Included
Intercept	-0.10 ( 2.36 )	1.24 ( 2.16 )	0.24 ( 2.24 )
State Unemployment Rate in 1999	0.40 ( 0.40 )	0.18 ( 0.37 )	0.12 ( 0.40 )
Metro Population Dummy (State in 90th Percentile)	0.34 ( 0.98 )	-0.24 ( 0.99 )	-1.84 ( 1.34 )
Pre-Welfare Reform ABAWD Proportion	0.20 ( 0.13 )	0.19 ( 0.13 )	0.21 ( 0.13 )
Proportion of 1996 Non-Elderly That Are Permanent Resident Aliens			0.14 * ( 0.06 )
Policy Variables			
Aggregate Policy Variable		0.09 ( 0.20 )	
Waiver Use Rating	-1.07 * ( 0.50 )		-0.73 ( 0.49 )
15 Percent Exemption Use Rating	-0.12 ( 0.52 )		-0.07 ( 0.49 )
Disability Certification Policy Rating	0.26 ( 0.53 )		0.18 ( 0.50 )
Dependent Child Policy Rating	0.32 ( 0.60 )		0.39 ( 0.57 )
First Month of Time Limit Rating	0.57 ( 0.58 )		0.62 ( 0.55 )
Tracking Policy Rating	0.24 ( 0.41 )		0.31 ( 0.39 )
Qualified Work Activities for Nonparticipants (Dummy Variable)	-1.20 ( 0.95 )	-1.26 ( 0.93 )	-1.20 ( 0.90 )
Percent of E&T Funding Spent	3.01 * ( 1.47 )	2.43 ( 1.47 )	2.11 ( 1.44 )
R <sup>2</sup>	0.2962	0.1377	0.3853
Adjusted R <sup>2</sup>	0.0811	0.0115	0.1746
Number of Observation	48	48	48
Degrees of Freedom	36	41	35

Standard errors presented in parentheses.  
\*Significant at the 90 percent level of confidence.

can explain the proportion of adults that is ABAWDs in 2000 (although the latter does border on statistical significance).

In an alternative specification of the basic model, we replaced the six policy rankings with the aggregate policy ranking discussed above. As with the first model, this model explains little of the variation in state ABAWD populations. No variable in this model has a significant impact on the proportion of adults that is ABAWDs.

Another variation of the first model includes a variable measuring the proportion of the FSP population in each state that is permanent resident aliens (PRAs). This variable has a significant positive impact, and the inclusion of this variable more than doubles the model's adjusted  $R^2$ . However, there is not a strong conceptual basis for understanding why the relative size of the PRA caseload would have such a large impact on the relative size of the ABAWD caseload. We suspect that the PRA variable is actually capturing the effects of other factors that are correlated with the PRA caseload. Efforts to identify those other factors were unsuccessful. One theory is that states with large PRA caseloads were also states with large urban populations – and as such have larger ABAWD populations. However, measures of the proportion of each state's population that is urban typically were not significant, and they did not reduce the impact of the PRA variable on the adjusted  $R^2$ .

In addition to these three models, we estimated other specifications of the basic model that included such explanatory variables as:

- Number of qualifying work activities for ABAWDs in each state
- Number of supportive services provided to ABAWDs in each state
- A dummy variable indicating that the state offers qualifying work activities to nonparticipants
- A dummy variable indicating the state intends to use 100 percent of future E&T funds
- A dummy variable indicating that volunteer work counts as a qualifying work activity

- State unemployment rates weighted by the proportion of each state's population in nonwaived areas
- Quadratic functions of state unemployment rates
- Dummy variables indicating a state's unemployment rate is in the highest 5 or 10 percent of the nation
- The proportion of each state's population in metropolitan areas weighted by the proportion of the state's population in nonwaived areas
- Dummy variables indicating that the proportion of a state's population in metropolitan areas is in the top 5 or 10 percent of the nation

None of the alternative specifications performed better than the basic model. In most cases, the results were consistent with the basic model: few variables were significant, and  $R^2$  values were low. Most showed that state waiver policies are the only policies with a significant impact on the proportion of adults that is ABAWDs. Moreover, they continue to show that state-level economic conditions have little influence.

Thus, most of the variation in state ABAWD populations is unexplained by our models. Sampling error (for some states) and measurement error may account for some of the variation (while sampling error does not bias the coefficients, measurement error may). Additionally, our models may not appropriately measure the effects of policies on ABAWDs. For instance, the policies may interact in ways not specified in the models. Moreover, the aggregate state unemployment rates may not capture the effects that local unemployment rates have on the ABAWD population. Still, the results appear to suggest that there are other factors besides those in our models that account for the variation in the number of ABAWDs across states.