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Work Requirements, Time Limits, and Work Incentives in TANF, SNAP, and Housing Assistance

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Summary

Congress is again debating work requirements in the context of programs to aid poor and low-income individuals and families. The last major debate in the 1990s both significantly expanded financial supports for working poor families with children and led to the enactment of the 1996 welfare reform law. That law created the Temporary Assistance for Needy Families (TANF) block grant, which time-limited federally funded aid and required work for families receiving cash assistance. Work requirements, time limits, and work incentives are intended to offset work disincentives in social assistance programs, promote a culture of work over dependency, and prioritize governmental resources. Another rationale for such policies is that without income from work, a person and his or her family members are almost certain to be poor. For many of these same reasons, some policymakers recently have expressed interest in extending mandatory work requirements and related policies—similar to those included in TANF—to the Supplemental Nutrition Assistance Program (SNAP) and housing assistance (public housing and the Section 8 Housing Choice Voucher program).

Some work rules and related policies already exist for SNAP and housing assistance. For example, SNAP time-limits aid for able-bodied adult recipients without dependents who do not work. However, for other able-bodied, nonelderly adults, for the most part, states are only required to have those who are unemployed or underemployed register for work. States may opt to make other SNAP employment and training mandatory or voluntary for recipients. Public housing has an eight-hour-per-month community service and economic self-sufficiency requirement for nonworking, nonexempted individuals. No work requirements apply to those receiving rent subsidies through the Section 8 Housing Choice Voucher program, and neither program has statutory time limits. However, public housing authorities that administer public housing and/or the Section 8 Housing Choice Voucher program may impose work requirements and time limits if they are participating in the Moving to Work Demonstration program. Further, all three programs—TANF, SNAP, and housing assistance—include some form of earnings disregard policy intended to alleviate the work disincentive inherent in the structure of the benefits provided.

Over time, TANF data have reflected relatively modest participation among recipients in work or related activities. However, the cash assistance caseload declined substantially after enactment of TANF, owing mostly to a decline in the share of eligible families actually receiving benefits. TANF work requirements and time limits are likely a part of the cause of that decline, contributing to the behavioral changes of recipients leaving the rolls quicker and some eligible households not coming onto the rolls in the first place. In addition to TANF changes, other policies were put in place in the 1980s and 1990s that helped “make work pay” more than welfare.

If Congress considers extending the “lessons” of TANF through additional work-related policies in food and housing assistance programs, policymakers face numerous considerations, including the various ways in which TANF differs from SNAP and housing programs. The populations differ: TANF requirements apply mostly to single mothers with children, while SNAP and housing assistance programs serve more men. Additionally, TANF work requirements were intended to spur nonworking recipients into the labor force. SNAP and housing programs often serve households that already include workers, albeit those who earn low wages, as well as a substantial number of individuals not typically expected to work, such as the elderly and persons with disabilities. Additional considerations include whether to implement any new requirements

as performance measures applicable to states or other administering entities (like TANF) or as direct requirements for individual recipients. Enforcing these policies, and/or offering supports to ensure their success, also costs money and requires an administrative structure.

TANF requirements were put into place following a decades-long period of experimentation and research on “welfare-to-work” programs. There is currently no such research base for SNAP and housing to help inform policymakers as to what works. Additionally, questions can be raised as to whether TANF-like work requirements, based on evidence from the 1980s and early 1990s, would be effective in the current economic environment. Additional research, either as a part of any reforms or in advance of any reforms to SNAP or housing assistance, might prove helpful in answering these questions.

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Introduction

Congress is again debating how to promote work in the context of programs to aid poor and low-income people and families, including the Supplemental Nutrition Assistance Program (SNAP, formerly known as food stamps) and federal rental housing assistance programs (public housing and the Section 8 Housing Choice Voucher program). A number of factors have combined to heighten Congress's interest in this topic. Concerns have been expressed about continued "dependency" of families on government assistance as well as the amount of federal spending on these programs, work disincentives inherent in program design, and the effectiveness of our current social safety net in adequately addressing poverty.

The last major debate over the role of work in social assistance programs culminated in the 1996 welfare reform law (the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, P.L. 104-193), which created the Temporary Assistance for Needy Families (TANF) block grant. Policies enacted in the 1990s, including those in the welfare reform law, focused on assistance for low-income families with children, particularly those headed by single mothers, and reduced the availability of assistance for families without workers, but expanded aid to low-income families with wage earners. Following enactment of the 1996 welfare reform law, the number of families with children receiving cash assistance declined dramatically, employment of single mothers increased, and poverty among children declined. However, in the 2000s—even before the onset of the 2007-2009 recession—some of these gains were eroded and even reversed. Overall, household incomes were relatively stagnant during the decade, and the economic circumstances of some populations (e.g., poor men with low levels of educational attainment) continued to deteriorate.

The House Budget Committee, in reporting the Concurrent Resolution on the Budget (H.Con.Res. 25) for FY2014, called for creating work participation standards in SNAP. It also called for reforms of need-tested assistance programs in general, by devolving them to the states and with the goal of building on the welfare reforms of the 1990s.¹ Work requirements for SNAP were part of the recent "Farm Bill" debate (P.L. 113-79, Agricultural Act of 2014); ultimately Congress retained existing SNAP work rules but required and funded up to 10 pilot projects to test alternative employment and training strategies, including some features similar to those of TANF work programs.

This report focuses on work requirement, time limit, and work incentive policies in three programs: the TANF block grant, SNAP, and housing assistance programs. TANF is sometimes touted as a model program with work requirements and time limits that can be applied to other low-income aid programs. However, as will be explored in this report, its policies and lessons are complicated and may not be fully applicable to other social assistance programs. Thus, policy makers considering expanding these policies face a number of considerations, which are discussed later in this report.

¹ See U.S. Congress, House Committee on the Budget, *Concurrent Resolution on the Budget—Fiscal Year 2014*, Report to accompany H.Con.Res. 25, 113th Cong., 1st sess., March 15, 2013, pp. 88-90.

Background

Government benefit programs help families and individuals avoid destitution and provide a measure of economic security for them. The generosity of such benefits, and the terms and conditions placed on their receipt, can also affect labor markets, by potentially affecting participation in the labor force as well as the wages for which workers are willing to accept employment. Work is a central feature of government benefit programs in the United States. The largest benefit programs are social insurance programs, such as Social Security, Medicare, and Unemployment Insurance, which provide benefits earned through work in covered employment. Low-income assistance programs—with benefits based on financial need, not past work—also can affect participation in the workforce, particularly for those who can command only low wages.

Rationales for Work-Related Provisions in Low-Income Assistance Programs

In order to understand the current set of policies in TANF, SNAP and federal rental housing assistance, it is useful to be familiar with the rationales for work-related requirement and incentive policies, including time limits, in social assistance programs. Four primary rationales for such policies have historically been put forth: offsetting work disincentives inherent in social assistance programs; promoting a culture of work rather than one of dependency; rationing scarce taxpayer dollars to the truly needy; and combating poverty.

Offsetting Work Disincentives in Social Assistance Programs

One rationale for work incentives and requirements in government assistance programs has been to combat the work disincentives inherent in means-tested benefit programs. Some argue that assistance programs allow individuals and families to consume goods and services independent of work, lessening the pressure to search for employment and go to work. Additionally, benefits based on need usually are reduced by some amount as an individual's earnings increase, eventually ending when the individual, family or household is no longer financially needy under a program's rules. This means the individual faces a relatively high implicit "tax" rate, as part or all of a worker's increase in earnings is offset by a decrease in social assistance benefits. Empirical studies have generally confirmed that providing social assistance has a work disincentive, though the size of that disincentive has historically been in dispute.²

"Work requirements" counteract the work disincentives of government benefits by requiring a recipient to engage in a labor market-related activity—rather than nonmarket activity, such as homemaking, child-rearing or leisure—as a condition of receiving government benefits. That is, they create a mandated activity, which may potentially be non-paid (e.g., job search), that affects the decision of individuals to work or accept a job offer. Failure to engage in that mandated activity can result in a reduction or end of the government benefit.

² Robert Moffitt, "Incentive Effects of the U.S. Welfare System: A Review," *Journal of Economic Literature*, vol. 30, no. 1 (March 1992), pp. 1-61.

“Work incentives” are a set of policies designed to reduce the high implicit “tax rate” on earnings inherent in low-income assistance programs. They usually take the form of disregarding a portion of a recipient’s earnings (“earnings disregards”) in determining means-tested eligibility and benefits.

Culture of Dependency Versus Culture of Work

Another rationale for work requirements or incentives involves the centrality of work to the nation’s economic and social organization. Work is a social norm that the work disincentives inherent in means-tested programs might undermine. The argument has been made that if the social norm of work is not reinforced, an alternative norm of dependency on government programs can take its place.³ “Dependency” on government programs implies an inability to function in society without government assistance. This dysfunction can lead to behaviors beyond simply responding to economic incentives and disincentives. Dependency has historically been discussed in conjunction with other social ills such as out-of-wedlock births, crime, and drug abuse.⁴

Thus, by counteracting work disincentives inherent in social programs, work incentives and requirements may promote a culture of work rather than a culture of dependency. Time-limiting public benefits is one way policymakers may choose to address concerns about dependency. Another is by supporting, encouraging, or requiring families to increase their work effort, so that their incomes increase and they are no longer in need of public benefits.

Prioritizing Limited Federal Resources

A third rationale involves a desire to effectively distribute scarce federal resources. Time limit and work requirement or incentive policies that move families out of federal assistance can free up federal resources for other priorities. The requirement to be engaged in an activity imposes a “time cost” on benefit receipt, and for some individuals, the value of the benefit may not exceed the cost of having to engage in a work or job preparation activity. It has been argued that work requirements “screen” out those not in true need of benefits, limiting benefits to those who have little alternative.⁵

In the case of housing assistance programs, the concern is more acute because the programs are only funded at a level sufficient to serve roughly one in four eligible families. Therefore, in most communities, there are very long waiting lists for assistance. New families can be assisted, generally, only when currently-assisted families leave the program.

TANF block grant funds are capped, and states (rather than the federal government) have the incentive to minimize their cash assistance caseloads to permit them to spend their funds on other

³For a discussion of this argument, see Lawrence M. Mead, *Beyond Entitlement. The Social Obligations of Citizenship* (New York: The Free Press, 1986).

⁴ For example, journalist Ken Auletta opens his 1982 book *The Underclass* with the question: “who are the people behind the bulging crime, welfare, and drug statistics—and the all-too-visible rise in anti-social behavior that afflicts most American cities?” Ken Auletta, *The Underclass* (New York: Random House, 1982).

⁵ For example, see Timothy Besley and Stephen Coate, “Workfare Versus Welfare: Incentive Arguments for Work Requirements in Poverty-Alleviation Programs,” *American Economic Review*, vol. 82 (March 1992), pp. 249-261.

benefits and services. While SNAP funding is not capped, the argument has been made that federal tax dollars are scarce and aid should only be prioritized for those who are truly needy.

Combating Poverty

In most cases, without income from work, a person and his or her family members are almost certain to be poor. Almost all persons who are not poor are in families who either have a worker or receive work-related benefits.⁶ Reliance solely on means-tested benefits almost always relegates a person and his or her family to poverty. Thus, a rationale for requiring or incentivizing work in social assistance programs is to promote what is effectively the only route out of poverty for a family. However, as is explored later in this report, while work is almost always necessary for a family to advance out of poverty, it is not always sufficient without other income supports, such as the Earned Income Tax Credit.

Work and Cash, Food, and Housing Assistance: Brief History

A review of the legislative histories of cash, food (food stamps, in particular), and housing assistance, illustrates the different ways that beneficiaries' employment status and employment services became an issue for the programs. Furthermore, as each program has different authorizing statutes (reauthorized or extended at different intervals), authorizing committees and appropriating subcommittees, and political stakeholders, it may be challenging to coordinate the work-related policies among the programs and assure that all consider current economic needs and research findings.

The federal role in providing cash assistance to the needy dates to the Social Security Act of 1935 (P.L. 74-271), which created both social insurance programs to provide protection against old age and unemployment as well as federal grants to help states pay public assistance benefits for the aged, blind, and needy families with children. The public assistance programs provided benefits based on financial need and only to those categories of the poor considered by policymakers at the time as not expected to work.

For needy families with children, benefits were provided to permit mothers to stay home and raise children through the Aid to Dependent Children program, later renamed Aid to Families with Dependent Children (AFDC).⁷ Over time, with increases in the labor force participation of mothers in the general population, policymakers changed their expectations of work for poor mothers, leading to the establishment of work requirements in AFDC.⁸ The cash public assistance

⁶ Work-related benefits are those from social insurance programs (Social Security, Unemployment Insurance) or private deferred compensation benefits, such as pensions, based on past work.

⁷ State and local programs known as "Mothers' Pensions" provided benefits to single parents with children since the Progressive Era. These programs first received federal funding with the enactment of the Social Security Act. In developing the proposal that led to the Social Security Act, President Franklin Roosevelt's Committee on Economic Security stated that these programs were "defense measures for children." It further said that the programs "... are designed to release from the wage-earning role the person whose natural function is to give her children the physical and affectionate guardianship necessary not alone to keep them from falling into social misfortune, but more affirmatively to rear them into citizens capable of contributing to society." See Committee on Economic Security, *Report to the President*, 1935, p. 36.

⁸ See CRS Report R42767, *Temporary Assistance for Needy Families (TANF): Welfare-to-Work Revisited*, by Shannon Bopp and Gene Falk.

programs for the aged, blind, and disabled were federalized into the Supplemental Security Income (SSI) program by legislation enacted in 1972. SSI does not have a work requirement as these populations are not expected to work. The cash public assistance program for needy families with children was eventually converted into the TANF block grant, with work requirements and time limits that apply with respect to recipients of cash assistance.

Food and housing aid also date back to the Great Depression, but these programs served policy purposes aside from just helping the needy. Domestic food aid programs, including the Food Stamp Program, were established, in part, to support the U.S. agricultural economy. Housing assistance was established, in part, to promote economic activity in the form of construction.

The Food Stamp Program (renamed SNAP in 2008) originated with a 1961 Kennedy Administration pilot program, with the Food Stamp Program first legislated in the Food Stamp Act of 1964 (P.L. 88-525). Initially a program that served localities at state option (in lieu of distributing excess commodities), the 1971 amendments to the Food Stamp Act (P.L. 91-671) created uniform federal rules for eligibility and benefits.⁹

Though Food Stamps were still considered part of agricultural economic policy as well as a program to alleviate hunger, as a means-tested program it raised concerns about how its benefit would impact participants' employment, and the 1971 law began to make many of the work-related rules that are in current SNAP law today. P.L. 91-671 required able-bodied adults to register for work, and it disqualified those who quit jobs or refused employment. The Conference Committee on the legislation noted that other "welfare reform" proposals were pending, and it endorsed a uniform "workfare" requirement that would also apply to food stamps.¹⁰ The Food Stamp Act of 1977 (P.L. 95-113) permitted limited "pilots" of food stamp workfare programs; "workfare" became a state option in 1981 (P.L. 97-98). Federal funding for Food Stamp employment and training activities (E&T) was added to the law in 1985 (P.L. 99-198). The 1996 welfare reform law (P.L. 104-193) added the time limit for nonworking able-bodied adults without dependents and amended some of the work registration requirements. The current financing of E&T dates to the 2002 farm bill (P.L. 107-171).

Housing aid evolved from programs supporting the construction of public housing to programs providing rental assistance to low-income families. The Housing and Community Development Act of 1974 (P.L. 93-383) created the Section 8 program, although the voucher aspect of the program was not added until the Housing and Urban-Rural Recovery Act of 1983 (P.L. 98-181). Both the public housing and Section 8 voucher programs were significantly reformed by the 1998 Quality Housing and Work Opportunity Reconciliation Act (QHWRA) (P.L. 105-276).

Work and self-sufficiency policies did not become part of assisted housing programs until the mid-1980s, and the initiatives that were adopted were generally small demonstrations.¹¹ This may

⁹ The pilot was begun under the authority of President Kennedy's first executive order: Executive Order 10914, "Providing for an Expended Program of Food Distribution to Needy Families," *26 Federal Register* 639, January 21, 1961. USDA-FNS's website features summaries of legislative history at <http://origin.www.fns.usda.gov/snap/rules/Legislation/default.htm>.

¹⁰ U.S. Congress, Conference Committee, *Food Stamp Act—Amendments*, Conference Report to Accompany H.R. 18582, 91st Cong., 2nd sess., December 22, 1970, H.Rept. 91-1793, (Washington: GPO, 1970). Workfare is a program model whereby program beneficiaries "work off" their benefits.

¹¹ Amy S. Bogdon, "What Can We Learn from Previous Housing-Based Self-Sufficiency Programs," in *The Home Front: Implications of Welfare Reform for Housing Policy*, ed. Sandra J. Newman, ed., 1st ed. (DC: The Urban Institute (continued...))

be, in part, because for the first several decades of public housing, the program primarily served working poor families. As a result of both policy changes and demographic changes, the number of nonworking and very poor families in public and assisted housing grew over time.¹² It was not until the 1998 reforms (P.L. 105-276) that the first work requirement for housing was put into place, which was a requirement that certain public housing tenants participate in community service or economic self-sufficiency activities for 8 hours per month.

Overview of Work-Related Policies in TANF, SNAP, and Housing Assistance

This report examines the work-related policies of TANF, SNAP, and housing assistance. As noted in the previous section, these programs have different purposes and different histories. Though there is overlap in populations served by the three programs, there are also differences in the populations they serve. This section provides a series of program comparison tables to illustrate the similarities and differences at-a-glance.

TANF is a broad-based block grant that helps fund public assistance benefits to families with children who have little in the way of financial resources at application. Benefits are restricted to the very poor, with income thresholds typically low enough so that cash assistance programs admit mostly the nonworking poor.¹³ Benefit amounts are a fraction of poverty-level income in all states. Its work requirements generally apply only to those who receive “assistance” (on-going, monthly cash aid).

SNAP and housing assistance are programs designed to help individuals and households afford economic necessities (food and housing, respectively). Their premise is that low-income households should not have to spend more than a specified percentage of their income for their food or for their housing (30% in each case). These programs serve low-income households who do not work, as well as those who do and they serve a more heterogeneous population than TANF, including elderly and disabled individuals, singles and couples without children, as well as families with children. Additionally, the income eligibility thresholds for these programs are generally higher than those for TANF.

Table 1 provides an overview comparison of the basic features of each of the programs.

(...continued)

Press, 1999).

¹² For a review of the history of public housing, see “A Brief History of the Public Housing Program,” in CRS Report R41654, *Introduction to Public Housing*, by Maggie McCarty.

¹³ For the maximum level of earnings for a family of 3 to newly qualify for TANF in July 2012, see David Kassabian, Erika Huber, and Elissa Cohen, et al., *Welfare Rules Databook: State TANF Policies as of July 2012*, U.S. Department of Health and Human Services, Administration for Children and Families, Office of Planning, Research, and Evaluation, OPRE Report 2013-27, November 2013, p. 88, http://www.acf.hhs.gov/sites/default/files/opre/databook_2012_final_nov2013_003.pdf.

Table I. Overview of Programs

Element	TANF	SNAP	Housing Assistance
Program Benefit	Monthly cash benefits and/or other forms of assistance, as designed by the state.	Federally defined monthly noncash benefits that can be redeemed only for program-eligible foods at program-authorized retailers.	<u>Public Housing</u> : publicly owned apartments that families can rent for a federally established below-market, income-based rent. <u>Section 8 HCV</u> : rent vouchers that families can use to rent private market apartments for a federally established below-market, income-based rent.
Target Population	Needy families with children, with state definitions of need. Though previous legal restrictions on aid to families headed by fathers and two-parent families have generally been eliminated, the most common TANF assistance family is headed by a single mother.	Low-income individuals and families. Largely defined by federal law as gross income of 130% of poverty, net income at poverty line (100%). More permissive federal eligibility rules for households with elderly or disabled members. Categorical eligibility for those that participate in certain programs, and additional flexibilities for state options.	Low-income individuals and families, defined as those with income at or below 50-80% of local area median.
Selected Participant Characteristics	TANF heads of households (whether receiving benefits on their own behalf or on behalf of children only): elderly, 2%; disabled, 13%; ineligible noncitizens, 12%; nonrecipient, nonparent caretakers, 9%; other nonelderly, nondisabled adults, 64%.	SNAP participants are 45% children, 10% disabled adults, 9% elderly adults, and the remaining 36% are nonelderly, nondisabled adults. ^a	<u>Public Housing</u> : 32% elderly headed households and 21% nonelderly disabled households; remaining 47% are households headed by a nonelderly, nondisabled adult. Forty percent of all households contain at least one child. <u>Section 8 HCV</u> : 21% elderly headed households and 28% nonelderly disabled household; the remaining 51% of households are headed by a nonelderly, nondisabled adult. Forty-eight percent of all households contain at least one child. ^b
FY2012 Caseload	1.8 million families	22.3 million households ^c	<u>Public housing</u> : 1 million households. <u>Section 8 HCV program</u> : 2 million households. ^b

Element	TANF	SNAP	Housing Assistance
Source of Funding and Entitlement Status	Federal mandatory appropriated block grant to states, plus states must contribute a minimum amount of state funds (a maintenance-of-effort requirement). The program is considered an entitlement to states, but not to individual beneficiaries.	Benefits are 100% federally funded via an open-ended mandatory appropriation. The benefits are considered an entitlement to individuals. States' administrative costs are matched by the federal government.	Federal housing assistance programs are 100% federally funded, via annual discretionary appropriations. Housing assistance is not an entitlement and appropriated funding levels are sufficient to serve only roughly one out of every four eligible households. ^d
Total FY2012 Expenditures	\$31.4 billion (\$9 billion for cash assistance) (federal and state)	\$78.4 billion (\$74.6 billion for benefits) ^c	\$25 billion (\$6.9 billion for Public Housing; \$18 billion for Section 8 HCV) ^e
Program Administration	States	States administer applicant eligibility determination	Local state-chartered Public Housing Authorities (PHAs)

Source: Table prepared by CRS. Unless otherwise noted, sources are TANF: CRS Report R40946, *The Temporary Assistance for Needy Families Block Grant: An Introduction*, by Gene Falk; SNAP: CRS Report R42505, *Supplemental Nutrition Assistance Program (SNAP): A Primer on Eligibility and Benefits*, by Randy Alison Aussenberg; Housing Assistance: CRS Report R41654, *Introduction to Public Housing*, by Maggie McCarty, and CRS Report RL32284, *An Overview of the Section 8 Housing Programs: Housing Choice Vouchers and Project-Based Rental Assistance*, by Maggie McCarty.

Notes: (HCV= Housing Choice Voucher)

- a. Mark Strayer, Esa Eslami, and Joshua Leftin, *Characteristics of SNAP Households: Fiscal Year 2011*, USDA-FNS, November 2012; and CRS tabulations of the FY2011 SNAP quality control data files.
- b. HUD Resident Characteristics Report data for July 2012-October 2013, accessed November 15, 2013.
- c. USDA-FNS data, available at <http://www.fns.usda.gov/pd/SNAPsummary.htm>. Annual participation expressed as monthly averages. Expenditure data includes only federal expenditures.
- d. U.S. Department of Housing and Urban Development, *Worst Case Housing Needs 2011: Report to Congress*, Washington, DC, August 2013, p. 10, http://www.huduser.org/Publications/pdf/HUD-506_WorstCase2011_reportv3.pdf.
- e. Office of Management and Budget, *Public Budget Database*, accessed November 15, 2013.

The work-related policies in TANF, SNAP and federal housing assistance fall into three categories:

1. **Work requirements.** This approach makes the engagement in work or work activities (such as training or job search) a condition of eligibility for, or ongoing receipt of, benefits. TANF requires state governments to engage participants in work and requires states to sanction—reduce or end benefits—families that fail to comply with work requirements. Federal law requires most able-bodied adults receiving SNAP benefits to engage in work activities (e.g., register for work). Federal housing law has an 8-hour per month community service or economic self-sufficiency requirement for public housing residents not otherwise exempted or engaged in work; no such requirement exists for recipients of Section 8 Housing Choice Vouchers.

2. **Time limits.** This approach limits the eligibility for benefits to a specific duration, in some cases dependent on whether or not the program participant is working. A time limit alone does not necessarily directly help participants enter or re-enter the labor market, but it may provide incentive for them to do so. TANF limits federally-funded cash assistance to five years. SNAP has a time limit for able-bodied adults without dependents; these participants are limited to three months of SNAP benefits in a 36-month period if they are not working or engaged in work activities for 20-hours per week. The law governing federal housing assistance contains no time limit policy.
3. **Work incentives in benefit design.** While means-tested programs generally reduce the level of assistance as household income rises, which may be construed as a disincentive to work, benefit programs may be designed to lessen that disincentive or to reward employment. In TANF, states can determine whether to disregard any participant earnings. SNAP has an earned income deduction that results in slightly higher benefits for SNAP participants with wages. Public housing has an earned income disregard for two years; the Section 8 Housing Choice Voucher program has the same disregard, but only for households with disabilities. Certain families in the Section 8 voucher program may also participate in a work incentive program that provides for escrowed savings accounts.

These policies may differ significantly in their implementation. In some cases, federal policy may apply directly to individual program participants. For example, the 8-hour per month community service requirement applies to each nonexempt individual residing in public housing. However, in other cases, the federal policy may set performance standards for *states* or other program administrators based on the work engagement profile of their caseload. In TANF, for example, a state’s “work participation rate” can lead to a “caseload reduction credit” reward or a financial penalty levied on the state.¹⁴

The following tables review the work-related policies that are in place for the TANF, SNAP, and housing assistance programs, providing comparisons of the ways in which these concepts are included in the respective programs.

Work Requirement Policies

Table 2 compares the work requirement policies in TANF, SNAP, and housing assistance. As shown in the table, the major work requirement that applies in TANF is the federal work participation standard—a performance measure that applies to states, not directly to individuals. The TANF work participation standard requires that states engage a specific percentage of families receiving assistance in activities; its detailed rules determine both the minimum hours and types of activities that count as being “engaged” in activities. These rules promote a “work-first” welfare-to-work approach, emphasizing activities for rapid job attachment (job search), performing community service or engaging in an unpaid program to provide work experience in exchange for benefits, and short-term rehabilitative activities. Long-term education and training is

¹⁴ For more information about work participation rate and caseload reduction credit, see CRS Report R42767, *Temporary Assistance for Needy Families (TANF): Welfare-to-Work Revisited*, by Shannon Bopp and Gene Falk.

limited. (For a discussion of the research on the effectiveness of “work-first” versus education and training, see “Research on Effective Strategies” in this report.)

Though the TANF participation standard has detailed rules, states have the flexibility to determine what requirements apply to individual recipients and families. They can engage families in other activities for fewer hours, though they cannot count that engagement toward the federal participation standards.

In contrast, SNAP work requirements apply to individuals (although some requirements vary based on state options). With respect to housing assistance, a community service or economic self-sufficiency requirement applies to individuals in public housing, but there is no federal work requirement for individuals in Section 8 voucher-assisted households. However, some public housing authorities participating in the “Moving-to-Work” demonstration can place work requirements on individuals and/or households (see “Housing Assistance: The Moving to Work Demonstration”).

Housing Assistance: The Moving to Work Demonstration

The Moving to Work (MTW) Demonstration was authorized by Section 204 of the Omnibus Consolidated Rescissions and Appropriations Act of 1996 (P.L. 104-134) in order to design and test ways to

- promote self-sufficiency among assisted families,
- achieve programmatic efficiency and reduce costs, and
- increase housing choice for low-income households.

Under Moving To Work, HUD can select up to 30 PHAs to participate in the demonstration and receive waivers of most rules that govern public housing and the Section 8 Housing Choice Voucher program. Over the years, Congress has expanded the demonstration by directing HUD to add additional agencies, so more than 30 PHAs are currently participating.

With HUD approval, MTW agencies can merge their Section 8 voucher and public housing funding, alter eligibility and rent policies, modify their reporting requirements with HUD, and make other changes. Agencies participating in MTW have used the flexibility it provides differently. Some have made minor changes to their existing Section 8 voucher and public housing programs, such as limiting reporting requirements; others have implemented full funding fungibility between their public housing and voucher programs and significantly altered their eligibility and rent policies. Relevant for this report, some have adopted time limit and work requirement policies, similar to those enacted in the 1996 welfare reform law.

The existing MTW program, while called a demonstration, was not implemented in a way that would allow it to be rigorously evaluated. Therefore, there is not sufficient information to evaluate the effectiveness of the various reforms adopted by MTW agencies. For more information about the various policies adopted by MTW agencies, see CRS Report R42562, *Moving to Work (MTW): Housing Assistance Demonstration Program*, by Maggie McCarty.

Table 2. Work Requirement Policies

Element	TANF	SNAP	Housing Assistance
Requirement	<p>States are required to engage a certain percentage of their families that include a “work-eligible individual” in activities. The percentage varies based on the caseload reduction the state has experienced.</p> <p>Work-eligible individuals are generally parents, certain nonrecipient parents (sanctioned or time-limited off the rolls), and nonparent, recipient caretakers. Certain categories are exempted.</p>	<p>Most able-bodied adults, unless otherwise exempt, are required to engage in certain work activities (e.g., register for work, accept a suitable job if offered one) in order to gain or retain eligibility for benefits. Further, states may require certain able-bodied recipients to participate in SNAP Employment and Training (E&T) Activities. According to FY2011 data, 25 states (including Guam) operate only voluntary E&T programs.^a</p>	<p>Certain nonexempt public housing residents are subject to an 8-hour per month community service or economic self-sufficiency (CS) requirement if they are not otherwise working. No other federal work requirements apply to public housing residents and no requirements apply to Section 8 HCV participants. However, some PHAs participating in the Moving to Work (MTW) demonstration have adopted work requirement policies.</p>
Exemptions from Requirement			
Age	None	Under age 16 or over age 59. Individuals between ages 16 and 18 are also exempt, if they are not a head of household or if they are attending school or a training program.	Public Housing CS Requirement: Persons age 62 and older are exempt.
Disability	Parents who receive SSI or Social Security disability may be exempted and disregarded in measuring state performance. A caretaker of a disabled family member may be exempt.	Those receiving disability benefits or otherwise physically or mentally unfit are exempt. A caretaker of a disabled dependent is exempt.	Public Housing CS Requirement: Those who are disabled and can certify that they cannot comply with the requirement and caretakers of a person with a disability are exempt.
Age of Youngest Child	Single parents caring for an infant (under age 1) may be exempted and disregarded in measuring state performance. Parents and caretakers with a child under the age of 6 cannot be sanctioned if child care is unavailable.	Parents needed to care for a child under the age of 6 may be exempted.	Public Housing CS Requirement: Those who would meet their state’s TANF exemption would be considered exempt (see TANF column in this row).
Other Exemptions	Nonrecipient, nonparent caretakers (grandparents, aunts, uncles) and nonrecipient ineligible noncitizens are exempt.	Those meeting other program requirements (TANF, unemployment insurance) and those in certain rehabilitation or education programs are exempt.	Public Housing CS Requirement: Those meeting TANF requirements are exempt, as are those who would meet their state’s TANF exemptions.

Element	TANF	SNAP	Housing Assistance
Treatment of Recipients with Earnings	Those working a sufficient number of hours per week are credited with participation toward the state performance measure.	Those working 30 hours per week or earning at least the minimum wage times 30 hours are exempted.	Public Housing CS Requirement: Individuals engaged in work or work activities are exempted. No minimum number of hours is statutorily established, although PHAs are encouraged by HUD to use a 30-hour per week standard.
Definition of Work and Work-Related Activities	States determine the activities for individual recipients. However, only participation in 12 activities counts toward the state performance measure: unsubsidized employment, subsidized private sector employment, subsidized public sector employment, on-job training, job search and readiness, work experience, community service, vocational educational training, job skills training, education directly related to employment, completion of secondary school, providing child care to a community service participant.	Federal requirements: All nonexempt recipients must register for work (a state-administered process where the participant annually notifies the state's SNAP or employment service office that he or she is employable and not working), must accept a suitable job if offered one, and may not voluntarily quit a job without good cause. A recipient may not voluntarily reduce work effort below 30 hours per week. State requirements: Varies by state whether a recipient is required to participate in SNAP E&T services and what services the state offers. ^b	Public Housing CS Requirement: Work and work activities, for the purposes of determining whether a recipient is subject to the requirement, are defined using the 12 activities in TANF law. The community service or economic self-sufficiency activities required under the policy are determined by the PHA.
Hours	States must engage individuals for a <i>minimum</i> number of hours per week to be credited with participation. Minimum hours depend on family type. Single mothers with pre-school children must participate at least 20 hours per week for the state to be credited for her participation.	The <i>maximum</i> hours per month that a state can require a recipient to participate in employment and training or workfare is the lesser of (1) the number of hours derived from dividing the household's allotment by the minimum wage, or (2) 120 hours per month.	Public Housing CS Requirement: Nonexempt individuals must perform eight hours per month of community service or economic self-sufficiency activities.
Sanctions for Failure to Participate	States determine sanctions; can end benefits (permanently) for families that do not comply.	States determine and enforce sanctions, with maximum penalty set in federal law depending on if it is the first, second, or third violation. Sanctions may range from a temporary disqualification of the violating household member (which will reduce the household's benefit), to permanent disqualification of violating household member, to "full family" sanction for no longer than 180 days.	Public Housing CS Requirement: Residents are evaluated annually for compliance and noncompliant residents are given an opportunity to cure. Failure to come into compliance results in termination of assistance and eviction from public housing.

Source: Table prepared by CRS. Unless otherwise noted, sources are TANF: CRS Report R42767, *Temporary Assistance for Needy Families (TANF): Welfare-to-Work Revisited*, by Shannon Bopp and Gene Falk; SNAP: CRS Report R42505, *Supplemental Nutrition Assistance Program (SNAP): A Primer on Eligibility and Benefits*, by Randy Alison Aussenberg; Housing Assistance: CRS Report RS21591, *Community Service Requirement for Residents of Public Housing*, by Maggie McCarty.

- a. For further details on states' SNAP E&T options, see <http://www.fns.usda.gov/snap/rules/Memo/Support/employment-training.htm>.
- b. E&T activities can include supervised job search or training for job search, workfare (work-for-benefits), work experience or training programs, education programs to improve basic skills, or any other E&T activity approved by USDA-FNS.

Time Limit Policies

Table 3 compares time limit policies for TANF, SNAP, and housing assistance. TANF limits federally-funded assistance for families with an adult member to five years. The time limit does not apply to families without an adult member; e.g., families with the children in care of (a) a nonparent relative, such as an aunt, uncle, or grandparent; (b) a parent receiving disability benefits; or (c) a parent who is an ineligible noncitizen. It also does not apply to state funds that must be expended under a TANF state spending requirement.

SNAP has a time limit for able-bodied adults without dependents (ABAWDs) who are not working or who are not engaged in a work program. Such participants are limited to receiving 3 months of benefits in a 36-month period.

There are no federally-required time limits in housing assistance programs. However, public housing authorities operating a “Moving to Work” demonstration program may impose time limits on their assisted families.

Table 3. Time Limit Policies

Element	TANF	SNAP	Housing Assistance
Time Limits	Families with adult recipients are limited to 60 months of federally funded TANF assistance.	Able-bodied adults without dependents (ABAWDs) who are not meeting certain work requirements are time-limited in the benefits they receive; they may only receive three months of SNAP benefits in a 36-month period. States may receive waivers of this time limit rule, based on the availability of jobs in the state, and states may exempt some ABAWDs from the time limit.	There are no federal time limit policies in public housing or the Section 8 HCV program. However, some PHAs participating in the MTW demonstration program have adopted time limit policies.

Element	TANF	SNAP	Housing Assistance
Exemptions	Up to 20% of the caseload may be exempted from the time limit because of hardship. Further, families served solely with state funding are not subject to the time limit policy.	Up to 15% of the projected ABAWD population may be exempted. Unused exemptions carry over to subsequent years.	N/A
Labor Market Based Waivers	None	States may request a waiver of the ABAWD time limit in all or part of the state by reason of high unemployment or unavailability of jobs.	N/A

Source: Table prepared by CRS. Unless otherwise noted, sources are TANF: CRS Report R42767, *Temporary Assistance for Needy Families (TANF): Welfare-to-Work Revisited*, by Shannon Bopp and Gene Falk; SNAP: CRS Report R42505, *Supplemental Nutrition Assistance Program (SNAP): A Primer on Eligibility and Benefits*, by Randy Alison Aussenberg; Housing Assistance: CRS Report R41654, *Introduction to Public Housing*, by Maggie McCarty, and CRS Report RL32284, *An Overview of the Section 8 Housing Programs: Housing Choice Vouchers and Project-Based Rental Assistance*, by Maggie McCarty.

Work Incentive Policies

Table 4 compares the work incentive policies within the TANF, SNAP, and housing assistance programs. All three programs disregard a portion of earnings for assisted families and households. TANF’s earnings disregards are determined by the states. SNAP and housing assistance earnings disregards are federally-determined. In addition to earnings disregard policies, these programs also sometimes disregard certain accumulated savings. While not necessarily a work incentive, to the extent that such accumulated savings come implicitly or explicitly from earnings, these policies may help alleviate some disincentive for working families to save.

Table 4. Work Incentive Policies

Element	TANF	SNAP	Housing Assistance
Earnings Disregards	States determine whether and how much of earnings to disregard in determining eligibility and benefits.	SNAP offers a deduction (“earned income deduction”), and therefore a potentially higher benefit, for households that have earned income (i.e., income from a job). Specifically, 20% of earnings are disregarded in determining net income for eligibility and benefits.	Certain public housing residents are eligible for an earned income disregard, which disregards 100% of new earnings in the first year of employment and 50% in the second year for the purpose of establishing benefit levels.

Element	TANF	SNAP	Housing Assistance
Other Work Incentives	States determine rules for what assets count for eligibility. Some states have eliminated asset rules. Additionally, states may use TANF funds for Individual Development Accounts (dedicated savings accounts, funded by earnings) and disregard the value of these accounts in determining eligibility for cash assistance.	A number of work-related resources are excluded from being countable SNAP resources (assets) when determining SNAP eligibility. These include - tax-preferred retirement, education savings accounts, income tax refunds, and vehicles that are used to produce earned income. Under broad-based categorical eligibility, many states have eliminated asset tests. Nonrecurring lump sum payments—such as those associated with the EITC and tax refunds—are not counted in SNAP income (may be included in assets).	Some PHAs offer the Family Self Sufficiency program, allowing families to build escrow accounts with increased earnings. Some PHAs participating in the MTW demonstration offer their own work incentive programs.

Source: Table prepared by CRS. Unless otherwise noted, sources are TANF: CRS Report R40946, *The Temporary Assistance for Needy Families Block Grant: An Introduction*, by Gene Falk; SNAP: CRS Report R42505, *Supplemental Nutrition Assistance Program (SNAP): A Primer on Eligibility and Benefits*, by Randy Alison Aussenberg, and CRS Report R42054, *The Supplemental Nutrition Assistance Program (SNAP): Categorical Eligibility*, by Gene Falk and Randy Alison Aussenberg; Housing Assistance: CRS Report R42734, *Income Eligibility and Rent in HUD Rental Assistance Programs: Responses to Frequently Asked Questions*, by Libby Perl and Maggie McCarty.

Lessons from TANF

As described in the previous section of this report, the TANF program has a more robust set of work requirement and time limit policies than either SNAP or housing assistance. Those TANF policies are often cited as a model of effective program reforms. Therefore, it may be useful to look a little more closely at TANF’s policies and their outcomes, as presented in the next section of this report.

Engagement in Work Activities and Caseload Reduction

The popular perception is that most TANF families are required to work in order to continue to receive benefits; however, a large portion of the caseload is not engaged in work or work activities in a given month. The main TANF work requirement is actually one that applies to states, not individuals, and represents a performance standard. A state may meet TANF’s work participation standards by having families engaged in activities and achieving a target participation rate and/or by receiving credits that reduce its target rate.

Figure 1 shows the trend in both the number of families engaged in TANF work activities and the number of families on the rolls. The bars at the bottom of the figure show engagement in activities: the bottom bar shows engagement in unsubsidized employment (having a job while on the benefit rolls); the top bar shows engagement in all other activities. The two lines on the figure

show the trend in the number of families receiving assistance: the top line shows all families, the bottom line shows the total number of TANF families subject to the work participation standard.

Under TANF, the rate of participation in work and related activities has been relatively modest. The official TANF work participation rate has hovered in the vicinity of 30% during the life of the program.¹⁵ (The official participation rate is the number of families engaged in activities divided by the number of families subject to the rate.) Additionally, the most common activity for recipients was engagement in unsubsidized employment. Far fewer families had members participating in activities that states placed recipients into, such as job search, vocational educational training, and work experience.

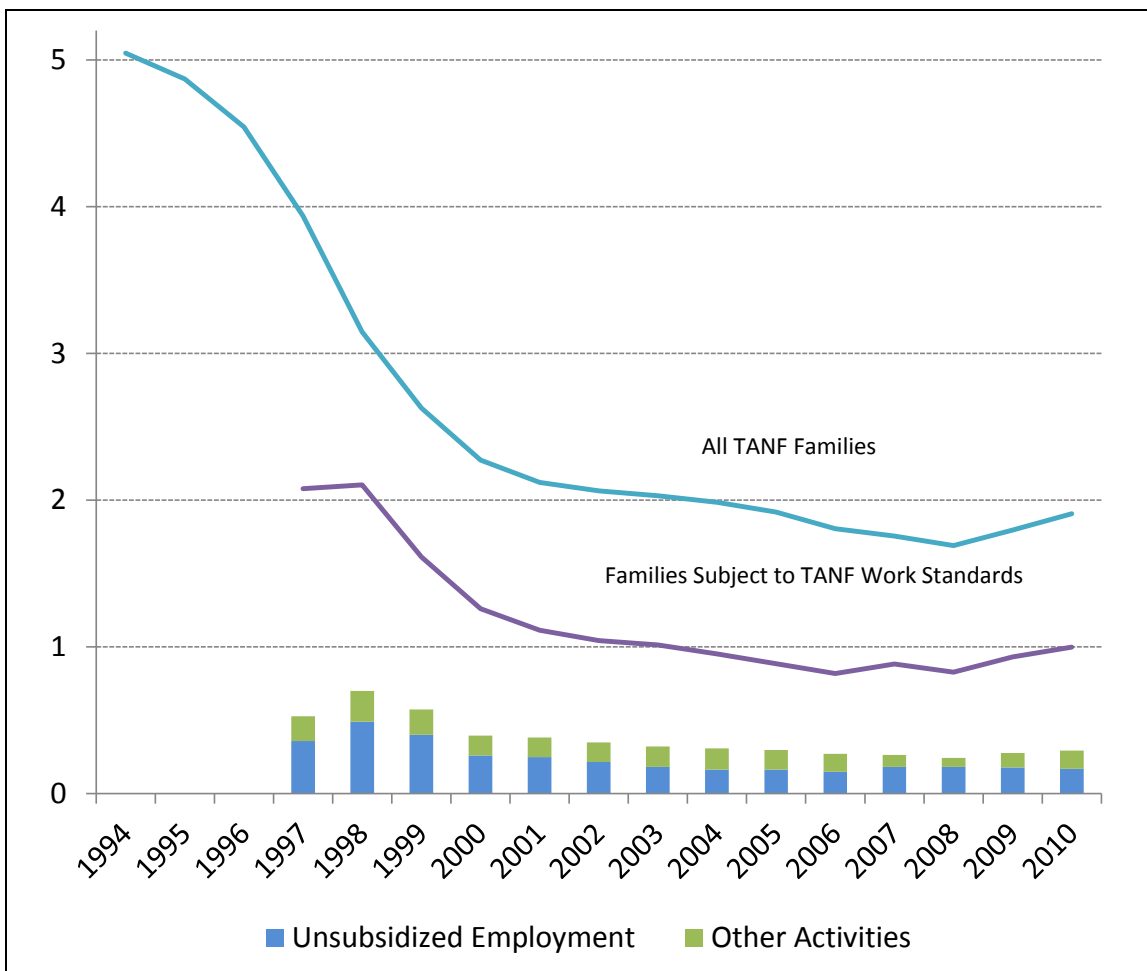
In FY1998, close to 700,000 TANF families had members who were counted as engaged in work or participating in activities: 491,000 employed in unsubsidized jobs while receiving assistance, 209,000 in other activities. With the decline in the caseload, these numbers diminished. In FY2010, 294,000 TANF families had members engaged in work or activities: 168,000 families in unsubsidized employment and 126,000 families in other activities.

Despite modest rates of work participation, there has been a large decline in the cash assistance caseload. The AFDC caseload began to decline in FY1994, prior to the enactment of the 1996 welfare reform law. During the pre-welfare reform period, states were experimenting with welfare-to-work programs of their own design, and states came under TANF rules beginning in FY1997. In FY2008, the number of families receiving assistance was one-third of what it was in FY1994.

¹⁵ Since FY2002, TANF's statutory participation standard set a target rate of 50%. However, most (but not all) states have met their participation standard, since the target standards were much reduced through credits.

Figure 1. AFDC/TANF Caseload and Number of Families Participating in Work Activities: FY1994-FY2010

(Families in millions)



Source: Congressional Research Service (CRS), based on data from the U.S. Department of Health and Human Services (HHS).

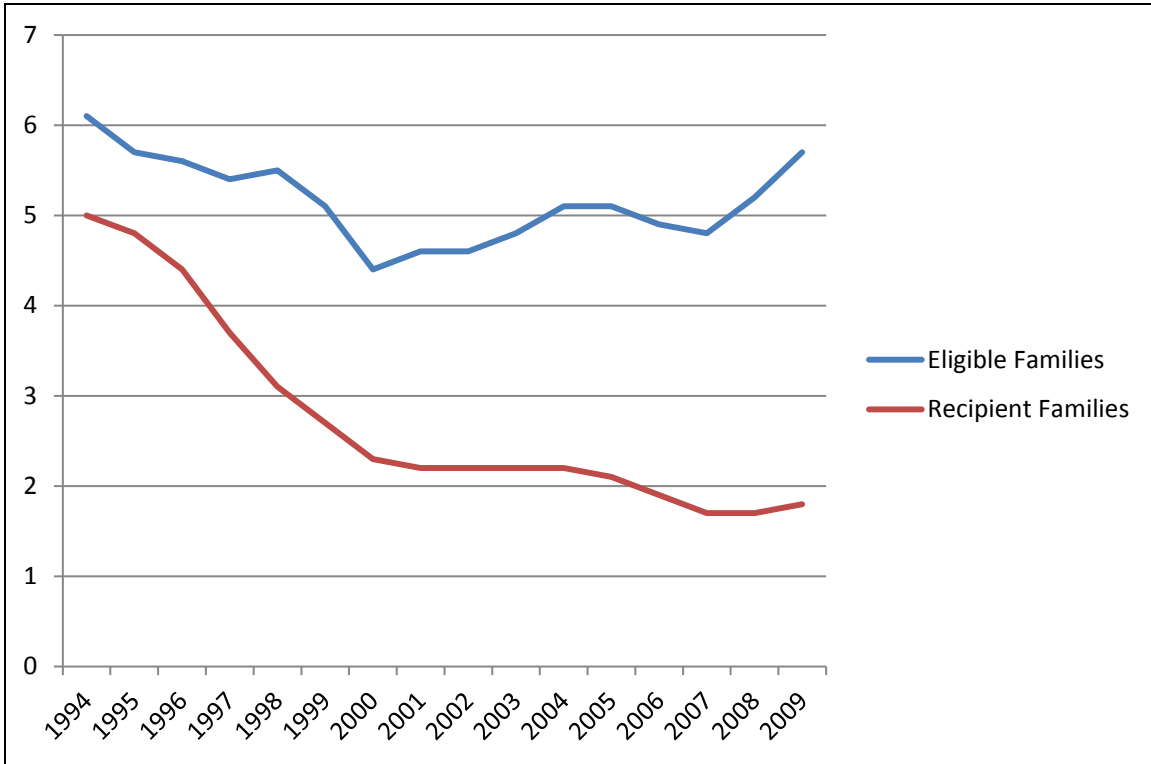
Notes: FY1997 was a transition year, and some states were not required to report TANF work participation data.

How did modest rates of participation in work translate into large caseload declines? In part, the booming economy of the late 1990s reduced the number of needy families, reducing the number of families financially eligible for aid. However, while there were fewer families eligible for assistance, the *share* of total eligible families actually receiving assistance also declined.

Figure 2 shows the estimated number of families eligible for, and the actual number of families receiving cash assistance for 1994 to 2009, and **Figure 3** shows this information as the percent of eligible families actually receiving benefits. As shown on **Figure 2**, the population eligible for cash assistance did decline in the 1990s (see top line of **Figure 2**). Still, the share of the eligible population actually receiving aid declined in that period too (see **Figure 3**). In 1994, 82% of eligible families were estimated to have received benefits. By 2001, this percentage declined to 48%. In the 2000s, even before the 2007-2009 recession, the number of families eligible for cash assistance began to rise (top line in **Figure 2**), but the caseload did not. By 2007, just before the

onset of the recession, the share of the eligible families receiving assistance had declined to 36%. In 2009, with the sharp increase in the number of eligible families and a relatively small increase in the caseload, that share had declined to 32%.

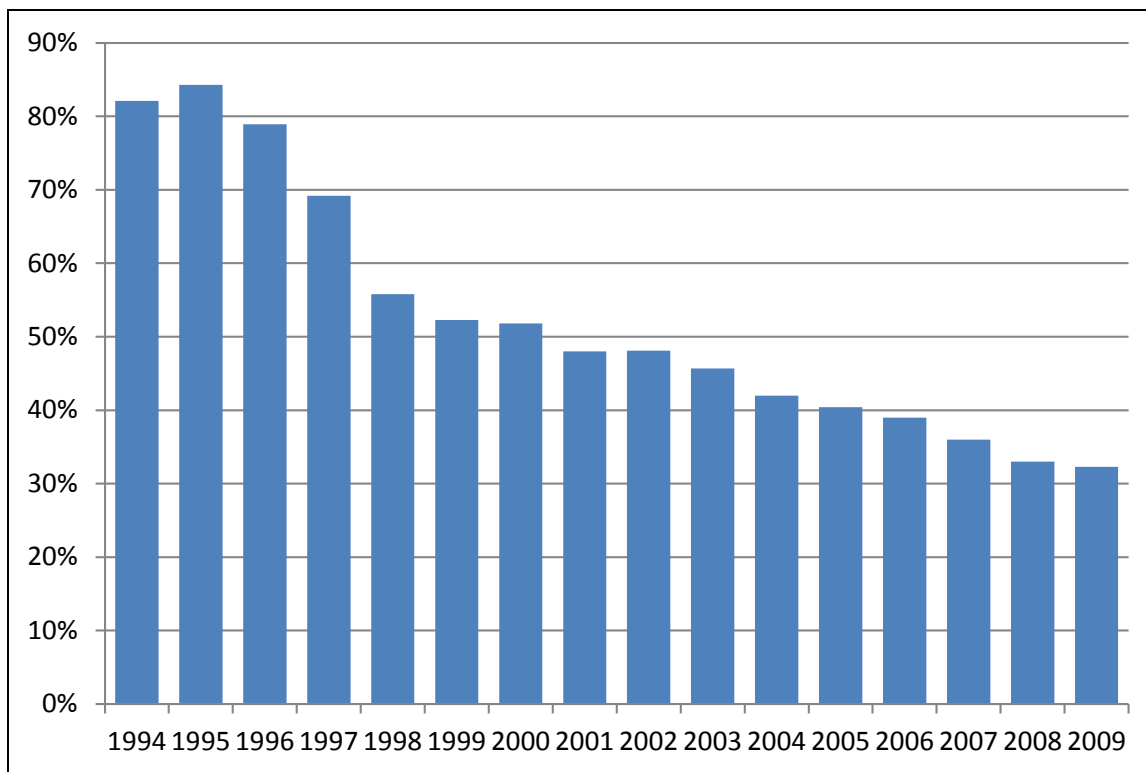
Figure 2. Number of Families Eligible and Receiving AFDC/TANF Cash Assistance Benefits
(Numbers in millions)



Source: Congressional Research Service (CRS), based on data published in U.S. Department of Health and Human Services (HHS), *Indicators of Welfare Dependence, Twelfth Report to Congress*, 2013.

Notes: Number of families eligible for cash assistance represents estimates based on the TRIM microsimulation model maintained by the Urban Institute. For a discussion of some of the assumptions and limitations of the estimating methodology, see the *Indicators of Welfare Dependence* report, Table IND4a, p. II-18.

Figure 3. Percent of Eligible Families Receiving AFDC/TANF Cash Assistance Benefits



Source: Congressional Research Service (CRS), based on data published in U.S. Department of Health and Human Services (HHS), *Indicators of Welfare Dependence, Twelfth Report to Congress*, 2013.

Notes: Number of families eligible for cash assistance represents estimates based on the TRIM microsimulation model maintained by the Urban Institute. For a discussion of some of the assumptions and limitations of the estimating methodology, see the *Indicators of Welfare Dependence* report, Table IND4a, p. II-18.

The enactment of TANF was preceded by a large amount of experimentation and research on welfare-to-work programs, and, while this research might have predicted that caseloads would decline, it would likely not have predicted this magnitude of decline. Research on the impact of welfare-to-work programs showed that mandatory work programs can increase employment and reduce receipt of government assistance, though the impacts of welfare-to-work programs *per se* tend to be relatively modest (see “Research on Effective Strategies” in this report).

Research subsequent to the enactment of TANF has found that the decline in the cash assistance caseload resulted both from families leaving the rolls more quickly and also from a decline in the number of families entering the program. In terms of reasons families left TANF quicker, work requirements and time limits are part of the story. These policies might have led to behavioral change: recipients responded to them by more quickly finding employment or other means of support.¹⁶ However, some families were removed from the rolls by sanctions for failure to meet work requirements and time limits. Removal of families from the benefit rolls because of

¹⁶ A synthesis of research on welfare-to-work and TANF discuss the evidence for such behavioral effects. See Jeffrey Grogger, Lynn A. Karoly, and Jacob Alex Klerman, *Consequences of Welfare Reform: A Research Synthesis*, Rand Corporation, July 2002, http://www.acf.hhs.gov/sites/default/files/opre/consequences_of_welfare_reform.pdf.

sanctions for failure to comply with work and activity requirements is far more commonplace than removal because of time limits. For example, in FY2010, 260,000 families had their TANF cash benefits ended because of refusal to comply with work requirements. In contrast, 25,000 families had their benefit ended by time limits.

In terms of families coming on to the rolls, one study, using national survey data, found that about 40% of the decline in the cash assistance caseload came from fewer entries onto the rolls.¹⁷ Again, there might have been behavioral changes as welfare reform policies might have deterred some from applying. Some policies also might have directly diverted families from the rolls. For example, states are free to condition TANF eligibility on any factor they choose. Many states have adopted “applicant job search” policies, requiring applicants for TANF cash to complete a job search before they receive their first benefit check. Some states also offer families short-term aid to address immediate emergencies in lieu of ongoing cash assistance. Such policies can divert potential TANF cash assistance families into employment, or deter families from completing requirements needed to receive cash assistance.

The caseload continued to decline in the period from 2000 to the beginning of the 2007-2009 recession, albeit at slower rates than the decline of the late 1990s. The caseload increased—though not as sharply and not to levels seen in previous periods of caseload growth—during the 2007-2009 recession and its aftermath.

The Obama Administration’s Welfare “Waiver” Initiative

The Department of Health and Human Services (HHS) announced an initiative in July 2012, under which it would be willing to waive certain federal work participation standards under the Temporary Assistance for Needy Families (TANF) block grant to permit states to experiment with “alternative and innovative strategies, policies, and procedures that are designed to improve employment outcomes for needy families.” The new waivers would permit states to have welfare-to-work initiatives assessed using different measures than the TANF work participation rate. Thus, states could test alternative welfare-to-work approaches by engaging recipients in activities not currently countable without risk of losing block grant funds. States would have to apply for waivers, which must be approved by HHS and the Office of Management and Budget (OMB). States would also be required to monitor performance measures and evaluate the alternative welfare-to-work program. HHS also indicated it might waive some requirements that apply to states for verifying work activities.

Some in Congress have opposed the Administration’s waiver initiative. The House has twice (once in the 113th Congress, once in the 112th Congress) passed measures to bar HHS from moving forward with granting waivers of the TANF work participation standards. Opponents of the waiver initiative question its legality and the process used in forwarding the initiative, and they claim that granting waivers of the participation standards would weaken the work requirements. As of October 1, 2013, no state had requested a TANF waiver under this initiative. For more information, see CRS Report R42627, *Temporary Assistance for Needy Families (TANF): Welfare Waivers*, by Gene Falk.

Economic Well-Being of Families with Children

The sharp caseload decline of the late 1990s promoted interest in how those leaving the assistance rolls were faring. Many states conducted studies to determine the share of welfare leavers that were employed, their level of earnings, and whether they continued to receive benefits from other programs, such as SNAP (then food stamps) and housing. In general, the research found the majority of those who left welfare did so for work. A multi-state study funded by the Department of Health and Human Services (HHS) found that about 57% of leavers were working in the first

¹⁷ Jeffrey Grogger, Steven J. Haider, and Jacob Klerman, “Why Did the Welfare Rolls Fall During the 1990s? The Importance of Entry,” *The American Economic Review*, vol. 93, no. 2 (May 2003), pp. 288-292.

quarter after exiting from the rolls. However, the earnings of welfare leavers were typically low, and employment was often not steady. Additionally, a high proportion of welfare leavers continued to receive SNAP after leaving cash assistance.

In examining the economic trends among single parent families with children since 1996, a Congressional Research Service (CRS) analysis concluded:

In the years immediately preceding 1996 welfare reform, and in the years since, the nation's income safety net has been transformed into one supporting work. Cash-welfare work requirements, the end of cash welfare as an open-ended entitlement by limiting the duration that individuals may receive federally funded benefits, and expanded earnings and family income supplements administered through the federal income tax system have helped to change the dynamics between work and welfare. The transformed system has helped to both reduce single mothers' reliance on traditional cash welfare and reduce poverty among their children.¹⁸

However, as that CRS report discusses, TANF is only a part of that story. The 1996 welfare law was one of a series of changes made to low-income assistance programs in the mid-1990s. This is discussed further in a later section of this report (see "Additional Work Supports").

Considerations in Extending Work Requirements and Time Limits to SNAP and Housing Assistance

As noted at the beginning of this report, work requirement, time limit, and work incentive policies are designed to meet any or all of several objectives, including offsetting work disincentives inherent in the benefit design of social programs; promoting a culture of work rather than a culture of dependency; prioritizing limited federal resources; and increasing the anti-poverty effectiveness of social assistance programs. Concern about all of these objectives helped drive the 1996 reform of cash assistance and the creation of TANF. As discussed at the beginning of this report, the same concerns remain for other social assistance programs, which has led some policy makers to consider expanding these policies, including to SNAP and housing assistance.

When deciding whether or how to extend new work requirement, time limits, and work incentive policies modeled after those used in TANF to SNAP and housing assistance, policymakers may wish to take several considerations into account. They include program-specific considerations, such as the different populations served by the programs, the different missions of the programs, and the different administrative structures. There are also technical considerations, such as how the policies should be applied, including how much flexibility to provide program administrators and the consequences for a family's failure to comply. Finally, there are a set of broader considerations, such as the relevance of research findings on the effectiveness of such policies, as well as the current state of the economy. The following section of this report explores some of those considerations.

¹⁸ CRS Report R41917, *Welfare, Work, and Poverty Status of Female-Headed Families with Children: 1987-2012*, by Thomas Gabe.

Different Populations: Men

An important distinction between TANF and SNAP or housing assistance is that TANF serves very few men, whereas SNAP and housing assistance serve many more men. This is relevant because TANF's emphasis has primarily been to get *single mothers* off assistance and into employment.

Historically, men have had higher labor force participation and employment rates than have women. However, over much of the post-World War II period, labor force participation rates among men have declined, in contrast to the labor force participation and employment rates of women, which increased from 1948 until the early 2000s.¹⁹

The decline in work among men has been associated with the declining fortunes of men who have lower levels of educational attainment. The median wage of men who worked full-year full-time peaked in 1973, and in 2011 stood 4.8% below that peak level in inflation-adjusted terms. This overall trend masks large differences in the wage trends for men by different levels of educational attainment since the mid-1970s. From 1978 to 2010, the average wage for a man without a high school diploma had declined 20%. In contrast, the average wage for a man with a bachelor's degree increased by 14%.

Disadvantaged men face other social and economic barriers. At the end of 2010, 1.6 million persons, of whom 1.5 million were men, were imprisoned in federal or state facilities. Incarceration rates in the United States have increased in recent decades, owing at least in part to the federal "War on Drugs."²⁰ Men re-entering society from prison face barriers in finding employers who will hire them.

Researchers have only recently begun to explore ways to reengage men successfully in the workforce, so consistently effective models for SNAP or housing assistance programs to adopt for working with the men in their populations are not currently available. Further, the largest work support available to single mothers exiting TANF—the Earned Income Tax Credit (discussed later in this report)—is either not available or available at a greatly reduced level to single men and noncustodial fathers.²¹ If work-related policies were expanded in SNAP and housing assistance, additional research on how those policies worked or did not work for men may be useful.

Different Populations: Workers

TANF's work requirements and time limits were particularly designed to combat welfare "dependency." The AFDC program of the late 1980s and early 1990s primarily aided families headed by a single mother who did not work. In FY1994, a monthly average of 9% of AFDC families reported earnings. The work requirements—and the work-first philosophy adopted in the TANF participation standards and by many states in their TANF programs—were designed to

¹⁹ CRS Report R41431, *Child Well-Being and Noncustodial Fathers*, by Carmen Solomon-Fears, Gene Falk, and Adrienne L. Fernandes-Alcantara.

²⁰ See CRS Report R42937, *The Federal Prison Population Buildup: Overview, Policy Changes, Issues, and Options*, by Nathan James.

²¹ See CRS Report RL31768, *The Earned Income Tax Credit (EITC): An Overview*, by Christine Scott.

obligate recipients to function in society through work, not necessarily to raise their earnings capacities through education and training.

The SNAP and housing assistance programs serve much more heterogeneous populations than TANF. It is possible to qualify for both SNAP and housing assistance at higher income levels than cash assistance. As discussed, families that left cash assistance for work often continued to qualify for and receive SNAP. Receipt of either SNAP or housing assistance may not be associated with chronic nonwork, but rather with the use of the benefit as an income supplement for those who command low wages in the labor market. In FY2011, a monthly average of 43% of SNAP households without elderly or disabled members had earnings.²² In FY2010, among households receiving housing assistance headed by a nonelderly, nondisabled member, 53% had at least some income from earnings.²³

Since SNAP and housing assistance often aid households with workers, albeit low-wage workers, another goal of extending work requirement and incentive policies to these programs could be to provide additional education and training to improve these workers' employability and upward mobility prospects. However, that goal may be difficult to accomplish. Evaluations of post-employment services of former welfare recipients or low-income workers have yielded little evidence that such programs have an impact on raising the employment and earnings of those already in the workforce.²⁴

Funding and Administrative Structure

Under current law, TANF presents greater funding, or at least capacity for funding, for employment and job training. SNAP and housing programs have many fewer resources available for or devoted to such efforts.

When the TANF program was created, it consolidated funding from both the prior law cash assistance program and the employment and job training program for welfare recipients, known as the JOBS program. In FY1996, JOBS was federally-funded at \$1.2 billion. It also had associated state funds. In FY2012, combined federal and state funding for TANF employment and training activities totaled \$2.2 billion, though it is unknown how much of those funds were used to enforce TANF's work requirements for cash assistance recipients versus other employment and training activities for low-income parents.

²² CRS tabulations of the FY2011 SNAP Quality Control Data Files.

²³ CRS analysis of data from HUD.

²⁴ For example, a multi-site evaluation of strategies to help individuals remain steadily employed and advance in the labor force was conducted by the Department of Health and Human Services (HHS), the Employment Retention and Advancement project begun in 1999. Of the 12 programs targeted to more employable groups, only three produced positive employment impacts: one that provided earnings supplements tied to job retention, a second that provided help with job-to-job transitions, and a third that was a community-based organization that provided individualized help. See Gayle Hamilton and Susan Scrivener, *Increasing Employment Stability and Earnings for Low-Wage Workers: Lessons from the Employment Retention and Advancement Project*, U.S. Department of Health and Human Services, Administration for Children and Families, Office of Planning, Research and Evaluation, OPRE Report 2012-19, April 2012, http://www.acf.hhs.gov/sites/default/files/opre/increasing_employment.pdf. Evaluations of earlier programs also lacked consistent, positive findings. See Anu Rangarajan and Tim Novak, *The Struggle to Sustain Employment: The Effectiveness of the Postemployment Services Demonstration*, Mathematica Policy Research, Inc., April 22, 1999.

In contrast, SNAP has a relatively small employment and training program. In FY2012, \$334 million in federal funding was provided for SNAP E&T. Federal housing programs do not receive any dedicated funding for employment and training programs, although some PHAs do receive funding to hire case managers for their Family Self Sufficiency programs. Many HUD housing assistance programs are subject to the “Section 3” requirement, which mandates that a portion of certain HUD program funds be used to provide job training, employment and contract opportunities to residents of assisted housing and other low-income members of the community.²⁵ However, the Section 3 requirement does not include any additional resources to fund education and training activities or to support connecting residents with jobs created.

In terms of the administration of the programs, SNAP is generally administered in the same state offices as is TANF. Therefore, the administrative structure for imposing work requirements and time limits on SNAP households could potentially be coordinated with TANF. Housing assistance, on the other hand, is administered at the local level, disconnected from the TANF and SNAP state systems. This leaves PHAs administering housing assistance with less obvious support and expertise for developing and implementing work supports.

Providing comprehensive employment supports in conjunction with new work-related policies, as was done in TANF, would likely require additional resources. Those costs raise several questions for SNAP and housing assistance. In both cases, the programs serve a significant number of participants who are likely to be exempted from any new work-related policies, namely those who are elderly or have disabilities. After accounting for the participants who are not expected to work, and the remaining recipients who already have income from work, the remaining participants likely subject to any such policies would be only a share of the total caseload of each program. In terms of housing assistance, this raises questions about whether the cost of administering the requirement and/or providing supports to make the requirement successful, would be worth the benefit. In SNAP, given the very large caseload relative to TANF and housing assistance, if the requirement applied to even a relatively small share of the caseload, it could still account for a fairly large number of people, and thus a large administrative cost.

Performance Measures Versus Individual Requirements

As discussed, the centerpiece of TANF work requirements is the federal TANF work participation standard – a numerical performance standard that *states* must meet or risk being penalized through a reduction in their block grants. Proposals to extend work requirements to SNAP and housing assistance could follow the example of TANF and create work participation standards for states or public housing agencies, or could establish federal standards that must be met by individuals.

Performance measures would give those entities operating programs (e.g., states, public housing authorities) flexibility in designing individual work requirements. They could determine exemptions, have flexibility in the activities emphasized by the program, and make these decisions based on their own caseload, local labor market needs, and other factors. Further, implementing a work requirement using a performance measure like the work participation standard may require engagement of only a portion of the caseload—allowing the costs of

²⁵ The requirement is authorized at and governed by 12 U.S.C. 1701u and 24 CFR Part 135. For more information, see http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/section3/section3.

imposing work requirements to be controlled and the efforts directed to a target population. A performance measure approach might also increase accountability for operating entities to provide employment and training opportunities.

Performance measures, including the current TANF work participation standard, can have intended and unintended consequences. Performance measures in general have been criticized as creating incentives that are “hitting the target but missing the point.”²⁶ For example, focusing on rapid job entry might lead states to engage in “cream skimming”—focusing on the easier-to-employ to increase their job entry rate, and failing to serve the hard-to-employ.

Using an individual mandate—requiring individual recipients to meet federal work requirements and time limits—may be more effective than performance standards in ensuring that all recipients are subject to the requirement. However, individual mandates limit the flexibility of program administrators to consider individual circumstances. They may also present greater administrative costs since they apply more broadly.

Sanctioning

Government assistance programs generally enforce mandatory work requirements by imposing a financial sanction on those who do not comply. The financial sanction is either a reduction in benefits provided to the family or household, or a complete ending of benefits. Sanctions can act as a motivation for recipients to comply with work requirements; yet families and households do lose benefits because of sanctions. Sanctioning represents one of the most difficult conundrums in social policy—families receive aid precisely because they cannot otherwise meet basic needs, yet reducing or ending that aid is the available way in which policymakers can enforce program requirements. (Current work requirement sanction policy was summarized in **Table 2**.)

Despite the central role of sanctions in enforcing work requirements, little research focuses on the implications of sanction policy, even in TANF.²⁷ Sanctions are an economics-based tool, and are premised on the notion that recipients make rational decisions about whether to achieve compliance with program rules, such as work requirements. However, as discussed earlier in this report (“Culture of Dependency Versus Culture of Work”), “dependency” on government benefits can represent dysfunctional behavior that fails to rationally respond to economic incentives and disincentives. Noncompliance with program rules might reflect deeper behavioral issues that are not affected by the presence of economic sanctions.

Federal TANF law requires states to sanction the benefit of families with a member who refuses to comply with work requirements. States determine the size of the sanctions. Over time, states have increasingly adopted full-family sanctions, ending benefits entirely for families that do not comply with requirements placed on them by states. Additionally, the rate at which families are sanctioned off the TANF cash assistance rolls increased in the 2000s. In July 2012, 46 states

²⁶ Gwyn Bevan and Christopher Hood, “What’s Measured is What Matters: Targets and Gaming in the English Public Health Care System,” *Public Administration*, vol. 84, no. 3 (August 2006), pp. 517-538, quoted *The Performance of Performance Standards*, ed. James J. Heckman, Carolyn J. Heinrich, Pascal Courty et. al. (Kalamazoo, MI: W.E. Upjohn Institute for Employment Research, 2011).

²⁷ For a discussion of this literature, see LaDonna Pavetti, Michelle K. Derr, and Heather Hesketh, *Review of Sanction Policies and Research Studies. Final Literature Review*, Mathematica Policy Research, Washington, March 10, 2003. Note that this literature review is now more than 10 years old.

ultimately ended benefits for families that fail to comply.²⁸ However, the two states with the largest TANF cash assistance caseloads—California and New York, which have a combined 39% of the national caseload—reduce but do not end benefits for noncomplying families.

SNAP law allows states to determine work-requirement sanctions, but it limits “full household sanctions” to a period of 180 days. Failure to comply with the public housing community service requirement can ultimately lead to the eviction of the household.

Implementing time limit and work requirement policies, along with TANF-like sanctions, in SNAP and housing assistance may raise unique considerations specific to those programs, given that food and shelter (which are provided by SNAP and housing assistance) are considered basic needs in a way that cash (as provided by TANF) is not. Under current policy, while cash benefits may be ended in TANF, the availability of other noncash medical, food, and (if the family received it) housing benefits means the family may still have some of its economic necessities addressed. If a policy of ending all benefits for noncomplying recipients of SNAP and assisted housing as well as TANF were adopted, concerns about hunger, malnutrition, and homelessness may arise, not just for the noncompliant adult recipient, but also for the children or elderly or disabled members of the family.

There are several considerations about sanctioning unique to housing assistance. When housing assistance benefits are suspended the consequences are clear and generally involve a family losing their home. In public housing, in order to suspend a benefit to a family, the family must generally be evicted. In the case of the Section 8 voucher program, payments on behalf of the family to the landlord cease, and presumably, the landlord will evict the family, assuming the family cannot make up the lost rent payments. Eviction can be lengthy, costly for landlords, and traumatic for families who may have difficulty securing other housing. Eviction is often pursued as a last resort, given these considerations and the fear of causing a family to be homeless without other options.

Another consideration unique to housing assistance is the household nature of the benefit. Housing benefits are provided to households, yet a sanctioning policy could be applied to an individual. An individual sanctioning policy could have the effect of putting families in the difficult position of staying together in the same household and facing eviction, lying about the composition of the household and risking eviction for fraudulently obtaining benefits, or breaking up the family by forcing the noncompliant member to leave the household in order to retain housing assistance.

Research on Effective Strategies

Welfare reform, of different varieties, was the subject of a series of social experiments, beginning with the 1960s and lasting through the 1990s. The first set of experiments were begun in the 1960s and tested various forms of negative income tax proposals, which guaranteed annual incomes for nonworkers, expanded aid to the working poor, and extended aid to families other than those headed by single mothers. The basic conclusion of those experiments was that the

²⁸ Urban Institute. *Welfare Rules Databook: State TANF Policies as of July 2012*. December 2013. P. 132-134.

guaranteed income did in fact reduce work effort. Moreover, expanding aid beyond single mothers would also reduce work effort, with no clear evidence that it prevented family breakup.²⁹

Beginning in the 1970s, social experiments were used to test the provision of employment services and then mandatory work requirements for AFDC recipients (who were mostly single mothers). The welfare-to-work experiments produced a large body of research evidence—with experiments conducted over a period of more than 30 years in many different settings.³⁰ The major findings of this research were the following:³¹

- Mandatory work-related programs for AFDC recipients could increase employment and reduce welfare receipt. The impacts were often modest.
- Programs with “work-first” (job search and other strategies to promote rapid job attachment) as well as programs with education-focused services produced positive impacts, though education-focused programs did not produce better job impacts than “work-first” programs, even over the long-term.
- These experiments did not produce evidence that welfare-to-work programs *per se* could reduce poverty, as often incomes of participants remained well below the poverty line, and increased earnings were often offset by reductions in AFDC and other government means-tested benefits. The programs that reduced poverty also included provisions for continued government-funded earnings supplements.

Thus the 1996 welfare reform law was preceded by a long era of research and experimentation on “what works.” This comprehensive research basis does not exist for SNAP and housing assistance or their unique populations. Further, the welfare body of research is quite old now, and questions remain about how relevant it is under today’s labor market conditions, including the challenges of post-recession recovery as well as the skills required for the jobs available in today’s economy.³²

²⁹ For a review of the “negative income tax experiments” see *Lessons from the Income Maintenance Experiments: Proceedings of a Conference Held in September 1986*, ed. Alicia H. Munnell (Federal Reserve Bank of Boston and The Brookings Institution, 1987).

³⁰ For a discussion of the history of the welfare-to-work experiments, see Judith M. Gueron and Howard Rolston, *Fighting for Reliable Evidence* (New York: Russell Sage Foundation, 2013).

³¹ For some more detail on these findings, see CRS Report R42767, *Temporary Assistance for Needy Families (TANF): Welfare-to-Work Revisited*, by Shannon Bopp and Gene Falk.

³² See discussion in: CRS Report R42767, *Temporary Assistance for Needy Families (TANF): Welfare-to-Work Revisited*, by Shannon Bopp and Gene Falk.

2014 Farm Bill Requires USDA to Pilot and Evaluate State Work Programs for SNAP Participants

Section 4022 of the Agriculture Act of 2014 (P.L. 113-79, the “Farm Bill”) requires USDA to conduct pilot projects to test work and job readiness strategies for SNAP participants. This provision was a compromise conference agreement, between (1) no changes to work rules in the Senate-passed bill and (2) House-passed changes that would have required additional monitoring and reporting, a repeal of USDA’s authority to grant areas waivers from the ABAWD time limit, and a work-related pilot that would have offered fiscal incentives for states to reduce their SNAP caseloads.

USDA is to select up to 10 pilot projects and provide grants to the states administering the chosen projects. Taken together, the projects should represent geographic diversity, target different subpopulations (e.g., participants subject to the ABAWD time limit, participants with limited work experience, or participants already working), test mandatory and voluntary participation models, as well as other criteria. While the pilots could test some features comparable to TANF work programs, regular SNAP work rules regarding maximum hours of participation and limits to household sanctions still apply.

Each project may run for no longer than three years. USDA is to conduct an independent, longitudinal evaluation of the projects’ impact on the employment and earnings outcomes of project participants.

For the projects, the law provides mandatory funding of \$10 million in FY2014 and \$190 million in FY2015. The funding is available until the end of FY2018.

Aside from the pilot projects, their evaluation, and related funding, the law also requires *all states* to set performance goals for their existing SNAP Employment & Training (E&T) programs and to report annually.

See CRS Report R43332, *SNAP and Related Nutrition Provisions of the 2014 Farm Bill (P.L. 113-79)*, by Randy Alison Aussenberg for further information on these and other nutrition program provisions in the new law.

Effectiveness of Work in Reducing Poverty

As noted earlier, one reason for promoting work in social policy programs is to increase the programs’ anti-poverty effectiveness, since the benefits provided through most social assistance programs alone are not sufficient to raise a family above poverty. Income from work is typically the only way for a family to escape poverty. **Table 5** shows the 2012 poverty rate for persons. Overall, 15.0% of all persons were officially in poverty. However, for those in families without a worker and who also lacked work-related benefits, almost 9 in 10 (89.5%) were classified as poor.

As shown in the table, while work or work-based benefits are usually necessary to avoid poverty, work alone is not always sufficient to do so. Almost 10% of all persons in families with workers were officially poor in 2012. The lowest poverty rates were for those in families with a full-year, full-time worker. Poverty rates were higher for those in families with workers, but lacking a full-year, full-time worker. This includes people who were unemployed or out of the labor force part of the year, and for those who worked part-time schedules. Additionally, poverty rates remained high for families with children headed by a single mother who worked. Three out of ten such families had earnings insufficient to raise their incomes above the poverty level.

Table 5. Poverty Rates in 2012 By Various Characteristics

	Poverty Rate
Overall poverty rate	15.0%
In a family with a worker in 2012	9.9
In a family with no worker, but received work-related benefits (social insurance or private deferred compensation) in 2012	20.3
No work; no work-related benefits in 2012	89.5
In a Family with a Worker in 2012	
In a family with a full-year, full-time worker	4.8
In a family with no full-year, full-time worker	31.2
In family with no child under age 18	6.5
In married couple or male present family with child under age 18	8.9
In family with a single mother and child under age 18	34.0

Source: Congressional Research Service (CRS) tabulations of the March 2013 Current Population Survey (CPS).

Additional Work Supports to Boost Family Income

In considering the welfare reforms that were enacted in the mid-1990s, work requirements and time limits were only one set of changes made to low-income assistance programs affecting families with children. The other major set of changes were those intended to “make work pay” more than welfare. As discussed in the previous section of this report, while work is usually necessary to escape poverty, it is not always sufficient to do so. The “make work pay” policies included the following:

- Major expansions of the Earned Income Tax Credit (EITC) in 1986, 1990, and 1996. The EITC provides a supplement to the earnings of low-income wage earners. In 2013, the maximum EITC for a taxpayer with three dependent children was \$6,044—a significant income boost for low wage working parents. Legislation in 1997 also created the Child Tax Credit. It became refundable for families with earnings in 2001, and substantially expanded later in that decade. For 2013, families with earnings can receive up to \$1,000 per child—an additional boost in earnings.
- Major expansions of federal funding for state programs that subsidize child care. The Child Care and Development Block Grant (CCDBG) was established by legislation in 1990 and its funding substantially increased in the 1996 welfare reform law.
- Extended health insurance coverage. Before health care expansions, mothers who left cash welfare risked losing Medicaid health insurance coverage for themselves and their children. In the 1980s, legislation was enacted to phase-in coverage for all poor children, regardless of whether they received cash welfare or not. The Family Support Act of 1988 (P.L. 100-485) created “transitional

Medicaid,” which extended coverage for a limited period of time to families leaving cash welfare. In 1997, the State Children’s Health Insurance Program (CHIP) was created to aid low-income families with income too high to receive Medicaid.

These benefits and services—outside of the “work incentives” of the cash assistance program itself—have been considered a key part of the reforms of the 1990s. However, they focus on families with children, particularly those headed by a single mother. Childless individuals and couples—who might be subject to work requirements in SNAP and housing assistance if such policies were adopted—benefit less from the policy changes made through the 1990s to “make work pay” more than receipt of assistance.

A small EITC was available for childless tax filers. In 2014, the maximum EITC available for a tax filer without a child is \$496, though a single person working full-year, full-time at the minimum wage would earn too much to qualify for an EITC. Proposals have been offered in the past that would expand and increase the EITC for childless tax filers.

Conclusion

The creation of TANF, with work requirements and time limits, marked a visible, major change in social policy. The record of TANF, particularly the sharply reduced caseloads following welfare reform, has sparked interest in extending TANF policies of work requirements and time-limited aid to other social assistance programs, including SNAP and housing assistance.

TANF’s experience may have some useful lessons for policymakers considering expanding TANF’s policies to other programs. It appears that the TANF caseload reduction generally resulted from fewer eligible families actually receiving benefits. Is this a desired goal for SNAP? In the case of housing assistance, which is only funded at levels sufficient to serve a portion of the caseload, a time limit or work requirement policy could allow the program to serve more families, albeit for shorter periods of time.

Further, it appears that the enactment of TANF policies, along with other income supplement policies and the strong economy of the 1990s, led to increased work for a population (single mothers) who were not previously engaged in the labor force. Whether these same policies, in the absence of new income supplement policies and in an economy with high unemployment, would have the same effect for the subpopulation of SNAP and housing assistance recipients who are not working and are expected to work, is an outstanding question. Additional research, either as a part of any reforms or in advance of any reforms, might prove helpful in answering that question.