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EXECUTIVE SUMMARY: STRATEGIES TO IMPROVE THE EFFECTIVENESS OF SNAP'S EMPLOYMENT AND TRAINING PROGRAM

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The Supplemental Nutrition Assistance Program (SNAP) helps people with low incomes avoid hunger and afford food. It stimulates the economy, improves individuals' success at school and work, and promotes better health. At the federal level, SNAP is operated by the Food and Nutrition Service (FNS) at the U.S. Department of Agriculture.

SNAP's Employment and Training (E&T) program is designed to assist participants in gaining skills, training, or work experience that help them obtain regular employment. States operate these programs and have flexibility in the services they provide, who receives them, and the entities that deliver these services. However, SNAP E&T has onerous restrictions and entrenched biases that most hurt communities of color. Several policies are rooted in racism and classism. By perpetuating systems of oppression, SNAP E&T pushes critical nutrition aid out of reach. These obstacles keep the program from serving as a supportive pathway to opportunity.

In this report, the Center for Law and Social Policy (CLASP) analyzes these challenges. CLASP also offers recommendations to advance racial equity within SNAP E&T and to make it function more effectively.

KEY FINDINGS

SNAP E&T HAS THREE FUNDING STREAMS THAT CAN UNDERMINE FOOD SECURITY GOALS

State SNAP E&T programs are funded in three different ways. They can receive federal grants; obtain federal reimbursement for 50 percent of program costs; and use private or community funds through third-party partnerships with workforce development providers.

Yet these funding streams can conflict with each other. Investments can uphold effective, voluntary programs but, at the same time, require mandatory programs that undermine access to SNAP benefits. Additionally, funding can maintain harmful restrictions that withhold nutrition assistance from certain adult populations, while upholding other rules that help such adults preserve their SNAP benefits.

MANDATORY WORK RULES AND RELATED RESTRICTIONS ARE INEFFECTIVE AND TARGET PEOPLE OF COLOR

Policies requiring some SNAP E&T programs to be mandatory are especially problematic. They are based on outdated, historical stereotypes against people who are Black, Latino, and other communities of color to undermine white Americans' support of public assistance programs.¹

CLASP's analysis underscores how rules mandating SNAP E&T participation are deeply ineffective. Research shows that work requirements and other restrictions do not improve employment or economic security for people with low incomes. Forcing people to navigate extra red tape only keeps basic needs out of their reach.²

By contrast, studies have demonstrated that voluntary programs can be more effective in boosting workforce goals.

Some mandatory restrictions hurt targeted populations. One rule imposes a harsh time limit on benefits for most working-age adults without minor children, often referred to as "able-bodied adults without dependent children" (ABAWDs)

With minimal exception, the rule only permits this group to access SNAP for three months every three years. It cuts off hundreds of thousands of people from food assistance when they are struggling with unemployment. This restriction falls hardest on people of color, who already face systemic discrimination in the labor market.³

SEVERAL SOLUTIONS EXIST TO ADVANCE RACIAL EQUITY AND STRENGTHEN SNAP E&T

Decision-makers can act to advance racial equity in this SNAP program. In so doing, leaders will enhance its effectiveness, ensuring it lifts more people out of poverty. To that end, this report offers several federal policy recommendations. It also shares strategies for states and SNAP administrators to make progress.

FEDERAL RECOMMENDATIONS

FOR CONGRESS

1. End mandatory work requirements from SNAP eligibility.
2. Eliminate the ABAWD time limits on using SNAP benefits. Before these time limits are fully repealed, policymakers should require that states seek ABAWD policy waivers for areas facing high unemployment.
3. Clarify that income earned through SNAP E&T and other programs under the Workforce Innovation and Opportunity Act should not count when determining a person's SNAP eligibility.

FOR THE USDA'S FOOD AND NUTRITION SERVICE (FNS)

1. Annually publicize tracked data on SNAP E&T employment outcomes. The agency should include the types of jobs people access and employment characteristics, such as the job's industry, wages, and benefits.
2. Until Congress ends mandatory work requirements in SNAP, FNS must track and publicize demographic data of people harmed by such barriers.
3. Develop and share with states a plain language model notice about actions people must take to keep their SNAP benefits when participating in a SNAP E&T program.

STATE RECOMMENDATIONS

FOR STATE POLICYMAKERS

Strengthen funding for workforce development programs, such as:

- Subsidized and transitional employment programs;
- Registered and youth apprenticeships; and
- Support for institutions proven to help jobseekers, like community colleges, among other programs.

FOR STATE SNAP AGENCIES

1. Engage in third-party partnerships with community-based organizations, community colleges, and other institutions that have positive relationships with employers. These organizations can leverage more federal funds for workforce development.
2. When designing SNAP E&T programs, consult with the state department of labor, labor unions, community-based organizations, and other groups representing working people. Such entities offer essential insight into addressing labor market inequities.
3. Expand the number of individuals served by voluntary E&T programs.
4. Educate public assistance workers about trauma-informed services and conduct mandatory, ongoing trainings on ending unconscious bias.

5. Improve screening and referral services for people seeking SNAP E&T services by centering their unique goals. Conduct comprehensive evaluations to gain an accurate understanding of their skills and interests. Then, jointly decide what program referrals will best support their needs.
6. Create a guide for anti-racist language to change bigoted narratives about people experiencing poverty and people of color.
7. Adopt a policymaking process that includes people who have participated in SNAP E&T programs. Similarly, establish procedures to gather input about agency effectiveness from people seeking or enrolled in SNAP benefits. Incorporating their feedback is vital to program improvement.

CONCLUSION: LEADERS CAN MAKE SNAP E&T MORE EFFECTIVE BY ENDING RACIST HARMS

This report emphasizes how federal and state policies governing SNAP's Employment and Training program can interfere with people's access to nutrition assistance. These barriers stem from historical racism and classism. While keeping people from accessing benefits, such policies are ineffective by other measures. They fail to yield any cost savings or employment gains.

Fortunately, federal and state policymakers have many opportunities to strengthen SNAP E&T. By adopting CLASP's recommendations, policy leaders and advocates can advance racial equity, bolster the workforce, and support greater economic security for more adults with low incomes.

ENDNOTES

¹ Madison Allen, "Racism in Public Benefit Programs: Where Do We Go from Here?," CLASP, July 23, 2020, <https://www.clasp.org/blog/racism-public-benefit-programs-where-do-we-go-here>.

² Ed Bolen, LaDonna Pavetti, Laura Harker, et al., Expanding Work Requirements Would Make It Harder for People to Meet Basic Needs, Center on Budget and Policy Priorities, 2023, <https://www.cbpp.org/research/poverty-and-inequality/expanding-work-requirements-would-make-it-harder-for-people-to-meet>.

³ Parker Gilkesson, "Finalized SNAP Rule is Rooted in Racial Discrimination," CLASP, July 7, 2023, <https://www.clasp.org/blog/finalized-snap-rule-rooted-racial-discrimination>.