



Red Tape, Empty Plates: An Analysis of the SNAP ABAWD Work Requirement in Kentucky

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the Kentucky Center on Economic Policy

April 2025



FRANK BATTEN SCHOOL
of LEADERSHIP *and* PUBLIC POLICY



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Glossary

ABAWD (Able-Bodied Adults Without Dependents): The SNAP participant group subject to stricter work requirements.

ACS (American Community Survey): National survey providing demographic and economic data used in research.

ARRA (American Recovery and Reinvestment Act): Temporarily suspended ABAWD time limits nationwide during the Great Recession.

Automatic economic stabilizer: A feature of fiscal policy (like SNAP) that automatically expands during economic downturns and contracts during expansions, helping to smooth out the business cycle without explicit government action.

BBA (Balanced Budget Act): Refined SNAP work requirements by allowing states to issue discretionary exemptions.

BLS (Bureau of Labor Statistics): Federal agency providing key labor market data.

Causal inference: The process of drawing conclusions about cause-and-effect relationships based on data analysis, often using specific statistical methods to rule out alternative explanations.

CHFS (Cabinet for Health and Family Services): Kentucky's agency administering SNAP and other services.

Cost-benefit analysis: A systematic process for calculating and comparing the benefits and costs of a project, decision, or policy.

CPS (Current Population Survey): National survey providing labor force and demographic data used in research.

DCBS (Department for Community Based Services): Kentucky's agency administering SNAP, including ABAWD work requirements.

Difference-in-differences (DiD): A quasi-experimental method comparing the change in outcomes over time between a group exposed to a policy (treatment group) and a group not exposed (control group).

E&T (Employment and Training): Programs designed to help SNAP recipients find employment and reduce reliance on assistance.

Endogeneity: A statistical issue where an explanatory variable is correlated with the error term in a regression model, potentially biasing estimates of the causal effect.

EUC (Temporary Emergency Unemployment Compensation): Federal program extending unemployment benefits, linked to historical SNAP waivers.

FFCRA (Families First Coronavirus Response Act): 2020 federal law that authorized nationwide SNAP waivers during the COVID-19 pandemic.

Fixed effects models: Statistical models used in panel data analysis to control for unobserved, time-invariant characteristics of individuals or units.

FNS (Food and Nutrition Service): The USDA agency overseeing SNAP and approving state waivers.

FRA (Fiscal Responsibility Act): 2023 legislation that raised the ABAWD age cutoff and reduced state discretionary exemptions.

GWR (General Work Requirement): The broader SNAP work requirement for adults aged 16-59, distinct from ABAWD-specific rules.

Intent-to-treat (ITT) effects: In an RCT, the estimated effect of *assigning* treatment, regardless of whether participants actually received or completed the treatment.

Internal validity: The extent to which a study establishes a trustworthy cause-and-effect relationship between a treatment/policy and an outcome.

KRS (Kentucky Revised Statutes): Codified laws of the Commonwealth of Kentucky.

KYPolicy (Kentucky Center for Economic Policy): Independent policy research organization that served as the client for this report.

Labor surplus area: A geographic area identified by the Department of Labor as having unemployment significantly higher than the national average.

Longitudinal comparisons: Analysis that involves tracking the same subjects or units (like counties) over a period of time to observe changes or trends.

Marginal tax rates: The tax rate applied to an additional dollar of income; relevant in discussions of work incentives.

Multiplier effect: An economic concept where an initial change in spending (like SNAP benefits) leads to a larger overall increase in economic activity and GDP.

Multivariate regression: A statistical technique used to analyze the relationship between multiple independent variables and a dependent variable.

Natural experiment: An empirical study where individuals or groups are exposed to experimental and control conditions determined by factors outside the researchers' control.

NPV (Net Present Value): Method used in the fiscal analysis to compare costs and benefits over time.

P2P (Paths 2 Promise): Kentucky's SNAP E&T pilot program operated in eight southeastern counties (2016-2019).

Panel data: Data collected by observing the same subjects (individuals, firms, counties, etc.) repeatedly over a period of time.

Point estimates: A single value (estimate) derived from sample data that is used to estimate a population parameter (e.g., the average effect of a policy).

PRWORA (Personal Responsibility and Work Opportunity Reconciliation Act): 1996 federal welfare reform law that established ABAWD time limits.

Quasi-experimental methods: Research designs that aim to estimate causal effects without random assignment, often using statistical techniques to mimic experimental conditions.

Randomized controlled trial (RCT): An experimental design where participants are randomly assigned to treatment or control groups to estimate causal effects.

Regression: A broad statistical method used to model and analyze the relationship between a dependent variable and one or more independent variables.

Regression discontinuity (RD) design: A quasi-experimental method used to estimate causal effects by comparing outcomes for units just above and below a specific threshold or cutoff.

Sensitivity analyses: A method used to test how robust the conclusions of an analysis are to changes in key assumptions or parameters.

SNAP (Supplemental Nutrition Assistance Program): The federal program providing food assistance to low-income households.

Specification: Refers to the specific set of variables, functional form, and assumptions chosen when building a statistical or econometric model.

Triple-differences (DDD): An extension of DiD, adding another layer of comparison (e.g., comparing the DiD effect for one population group versus another) to further isolate the policy effect.

USDA (U.S. Department of Agriculture): Federal department responsible for SNAP, primarily through the Food and Nutrition Service (FNS).

Weighted average: An average calculated by giving different weights (degrees of importance) to individual data points, often used when combining data from units of different sizes (e.g., weighting county data by population).

Work registrants: SNAP participants who are required to register for work as a condition of eligibility, distinct from the specific ABAWD time-limit rules but often overlapping.

Acknowledgements

I would like to thank Dustin Pugel at the Kentucky Center for Economic Policy for his collaboration and guidance throughout this project. His expertise and thoughtful feedback greatly informed my work, and I am grateful for the opportunity to contribute to the important efforts at KyPolicy.

I am also deeply thankful to my faculty advisors, Professors Annie Rorem and Sebastian Tello-Trillo, for their support and valuable insights throughout this process. Their feedback strengthened my analysis and helped me navigate the complexities of this project.

I am especially grateful to Professor Derek Wu, with whom I have had the privilege of collaborating over the past year. Providing research support for his and his co-authors work on poverty, inequality, and the role of social assistance programs has been an invaluable opportunity to contribute to a field I am passionate about, while gaining hands-on experience and further developing my skills as a policy researcher.

Lastly, I am thankful for my Batten peers, whose support, encouragement, and camaraderie throughout this process have made this experience all the more meaningful. Their feedback, advice, and friendship have been invaluable along the way.

Honor Statement

On my honor as a student, I have neither given nor received unauthorized aid on this assignment.

A handwritten signature in black ink that reads "Dylan Craig". The signature is written in a cursive, flowing style with a long horizontal stroke at the end.

Dylan Craig, Master of Public Policy Candidate

Disclaimer

The author conducted this study as part of the program of professional education at the Frank Batten School of Leadership and Public Policy, University of Virginia. This paper is submitted in partial fulfillment of the course requirements for the Master of Public Policy degree. The judgments and conclusions are solely those of the author, and are not necessarily endorsed by the Batten School, by the University of Virginia, or by any other agency.

Generative AI was used in the drafting and preparation of this report. All content was reviewed and finalized by the author.

Executive Summary

Kentucky faces a key decision on implementing Supplemental Nutrition Assistance Program (SNAP) work requirements for Able-Bodied Adults Without Dependents (ABAWDs), a group recently averaging over 60,000 Kentuckians. Federal rules limit non-exempt ABAWDs to three months of SNAP benefits per 36 months unless meeting an 80-hour monthly work requirement. States may request waivers in high-unemployment areas and grant limited individual time limit exemptions. Recent legislative efforts to tighten SNAP work requirements at federal and state levels prompts a reevaluation of Kentucky's options.

The Problem: SNAP work requirements significantly reduce participation without leading to sustained increases in employment or earnings. Research shows that enforcement of these policies increases food insecurity, disproportionately impacts vulnerable groups, and results in higher administrative costs and burdens for the state.

This report evaluates four alternatives for Kentucky's SNAP ABAWD policy:

1. **No Waivers or Discretionary Exemptions**
2. **County-Level Waivers Based on High Unemployment**
3. **8% Discretionary Exemptions with County-Level Waivers**
4. **Expanded SNAP Employment & Training (E&T) Services with County-Level Waivers**

Each alternative was evaluated and weighted for effectiveness (impact on food security and employment/earnings), equity (impact on vulnerable groups), feasibility (administrative and political), and fiscal cost (estimated impact on the state budget).

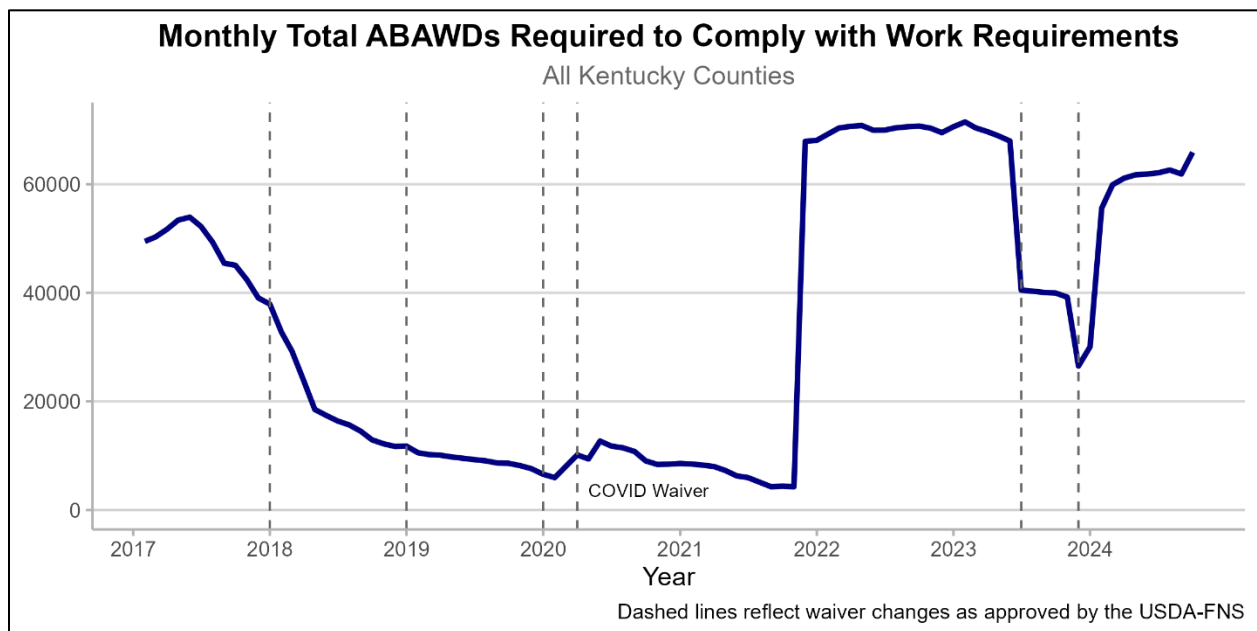
Based on the projected outcomes, this report recommends **Alternative 3: 8% Discretionary Exemptions with County-Level Waivers**. This approach combines the broad protection of county waivers with targeted use of the state's limited individual exemptions to assist vulnerable ABAWDs in non-waived counties who are unable to meet work requirements. It offers moderate to high effectiveness in reducing SNAP benefit loss and food insecurity while maintaining low-to-minimal fiscal cost for the state. Political feasibility is moderate, although changes to state law are required to begin authorizing these individual exemptions.

Implementing this recommendation requires the Kentucky General Assembly to amend state law (KRS § 205.178), which currently restricts the use of these individual exemptions. Following changes to the law, the Cabinet for Health and Family Services (CHFS) and the Department for Community-Based Services (DCBS) should establish a straightforward process to grant these exemptions as temporary relief for those at risk of losing SNAP benefits in non-waived counties.

This dual strategy provides a practical path to protect Kentucky's most vulnerable ABAWDs, ensuring continued access to food assistance while maintaining compliance with federal law.

Problem Statement

In Kentucky, tens of thousands of Able-Bodied Adults Without Dependents (ABAWDs) risk losing essential nutrition assistance under federal SNAP rules requiring at least 80 hours of work or training per month. Non-exempt ABAWDs who fail to meet this threshold are limited to three months of SNAP benefits in any three-year period—a policy waived only in areas with sufficiently high unemployment or through a very limited number of discretionary exemptions. Although designed to promote workforce participation and reduce reliance on public benefits, research shows these work requirements do little to improve employment or earnings among ABAWDs. Instead, they increase administrative burdens and worsen health outcomes, particularly among vulnerable groups with pre-existing health challenges or limited job prospects. These findings highlight the need for Kentucky to evaluate state-level policy strategies that either reduce the number of ABAWDs subject to these time limits or enhance supports that lead to meaningful, sustainable employment (USDA, 2025; Kentucky Cabinet for Health and Family Services, 2024).



Source: USDA Food and Nutrition Service, 2025; Kentucky Cabinet for Health and Family Services (CHFS) SNAP Administrative Data, 2017–2024; Author’s calculations.

Notes: Monthly count of Able-Bodied Adults Without Dependents (ABAWDs) subject to SNAP work requirements in Kentucky. Data reflects the number of individuals reported in CHFS administrative files as required to fulfill the 80-hour-per-month work or training requirement.

Client Orientation

The Kentucky Center for Economic Policy (KYPolicy) is an independent, nonpartisan research and policy organization dedicated to advancing policies that reduce barriers to well-being and address inequities across Kentucky. KYPolicy has consistently opposed state and federal legislative efforts to expand SNAP work requirements, highlighting the harm such policies inflict

on low-income Kentuckians by limiting access to basic needs like food assistance (Pugel, 2019; Pugel & Klein, 2022; Pugel, 2024).

This is a critical moment for KYPolicy to continue engaging with lawmakers. In recent years, Kentucky state legislators have intensified scrutiny of work requirement waivers, posing new risks for ABAWDs (Pugel & Klein, 2022; Pugel, 2024). With its expertise in SNAP policy and reputation as a trusted source for credible, nonpartisan research, KYPolicy plays a key role in shaping policy debates and advancing reforms to protect vulnerable Kentuckians.

Background

Supplemental Nutritional Assistance Program

The Supplemental Nutrition Assistance Program (SNAP) represents the federal government's primary nutrition assistance initiative, providing essential food support to millions of Americans in need. Established permanently under President Lyndon B. Johnson's administration through the Food Stamp Act of 1964, this program has evolved into the nation's most significant anti-hunger measure.

How Kentuckians Engage with the SNAP Program

For an individual or family participating in SNAP, engagement with the program typically involves several key steps. The process begins with submitting an application, either online via the Kynect Benefits portal or through a paper form, often requiring supporting documents like proof of identity, residency, income, and expenses.

Following the application, the Department for Community Based Services (DCBS) usually conducts an eligibility interview, typically by phone, to verify information. Once approved, the participant receives an Electronic Benefit Transfer (EBT) card, which functions like a debit card. This card is loaded monthly with benefits and used to purchase eligible food items at authorized grocery stores, participating farmers' markets, and some online retailers. Engagement continues beyond initial approval, as participants must repeatedly interact with DCBS through periodic recertifications to confirm ongoing eligibility and report significant changes in household circumstances. For some participants, particularly Able-Bodied Adults Without Dependents (ABAWDs), engagement may also involve tracking and reporting work or training activities to meet specific program requirements.

Source: Kentucky Cabinet for Health and Family Services, Department for Community Based Services

Scale and Impact

In the Fiscal Year 2023, SNAP demonstrated its substantial reach by serving over 42 million individuals monthly and operating with an annual federal budget exceeding \$112 billion (Economic Research Service, 2025).

Core Functions and Benefits

SNAP provides monthly food benefits to qualifying low-income households, serving multiple important functions. It reduces food insecurity by helping vulnerable households maintain access to nutritious meals, alleviates poverty by increasing recipients' disposable income, and acts as an automatic economic stabilizer during downturns by expanding enrollment when unemployment rises, directing additional resources to needy communities.

Research Support for SNAP Effectiveness

A 2019 report from the USDA Economic Research Service found that each \$1 billion in SNAP benefits generates approximately \$1.54 billion in GDP during economic downturns. This multiplier effect occurs because SNAP benefits are typically spent quickly in local economies. The resulting economic activity supports jobs in food retail, transportation, agriculture, and related sectors (Canning & Stacy, 2019).

Multiple independent studies (Bryant & Follett, 2022; Canning & Stacy, 2019; Mabli & Ohls, 2015; Nazmi et al., 2022; Nord & Golla, 2009; Ratcliffe et al., 2011; Tiehen et al., 2012; Vogel et al., 2021) collectively affirm SNAP's effectiveness in fulfilling all three of its core functions: reducing food insecurity, alleviating poverty, and providing economic stimulus during challenging economic periods.

Work Disincentives and Barriers to Access in SNAP

While SNAP aims to support nutrition, economic theory suggests its structure—where benefits decrease as earnings rise—could potentially disincentivize work by creating high effective marginal tax rates (Rachidi & Randolph, 2025). Early research on the Food Stamp Program's initial rollout indicated some association between benefit receipt and reduced work hours, particularly for single mothers (Hoynes & Schanzenbach, 2012). However, more recent studies focusing on the modern SNAP program and utilizing administrative data generally find limited empirical evidence of widespread labor supply distortions caused by the benefit structure itself (Bitler et al., 2021). Research suggests that for many recipients, significant external barriers—such as transportation, childcare costs, health issues, and job market volatility—often play a more dominant role in employment decisions than the marginal effects of SNAP benefits (Cook & East, 2024).

Beyond theoretical work disincentives, significant administrative burdens and practical barriers can hinder eligible households from accessing and maintaining SNAP benefits. Participants frequently encounter complex application and recertification processes, demanding documentation requirements, and difficulties communicating with caseworkers or navigating online systems

(Harrison, 2024). Additional hurdles include the digital divide, social stigma associated with benefit receipt, lack of awareness or misinformation about program rules, and underlying barriers to employment (Harrison, 2024). Research indicates that these cumulative burdens can deter enrollment and lead to benefit loss, while streamlined administrative processes—such as simplified reporting and longer recertification periods—are demonstrably effective at increasing participation among eligible populations (Prenatal-to-3 Policy Clearinghouse, 2024).

General and ABAWD-Specific SNAP Work Requirements

Overview

The Supplemental Nutrition Assistance Program (SNAP) incorporates work requirements to promote employment and self-sufficiency among able-bodied adults. These requirements aim to reduce dependency on public assistance by addressing potential work disincentives within the program. SNAP maintains two categories of work requirements that operate independently, and their rules are outlined on the USDA website.

General Work Requirements

The General Work Requirement applies to SNAP recipients aged 16 to 59 who are not otherwise exempt. To maintain compliance, these individuals must register for work, accept suitable employment opportunities when offered, refrain from voluntarily quitting jobs, and avoid reducing work hours below the equivalent of 30 hours per week at the federal minimum wage (\$7.25). Despite provisions for sanctions and benefit termination for non-compliance, research by Cook & East (2024) indicates that such penalties are rarely applied—affecting no more than 1% of work registrants across the four states analyzed. Several categories of recipients qualify for exemptions from the GWR, including individuals who have a disability, provide care for young children, are enrolled in education or rehabilitation programs, work sufficient hours or earn adequate income, or meet any other qualifying condition as outlined by the USDA.

ABAWD-Specific Work Requirements

A more stringent set of requirements applies specifically to Able-Bodied Adults Without Dependents (ABAWDs), defined as individuals aged 18-54 without dependent children and deemed physically and mentally fit for employment. To maintain SNAP eligibility beyond a three-month limit within 36 months, ABAWDs must engage in qualifying work activities for at least 80 hours per month. These activities can include paid employment, participation in a work-related program, or a combination of both. This 80-hour requirement applies regardless of earnings received. Furthermore, under specific conditions, an individual who fulfills the work requirement to regain eligibility after hitting the time limit but fails to meet it again may receive an additional three consecutive months of benefits—a provision usable only once within three years. Certain groups, upon verification, receive exemptions from ABAWD requirements, including veterans, homeless individuals, and young adults under age 24 who have aged out of the foster care system. Additionally, states have several policy levers to adapt the enforcement of the ABAWD work

requirement to reflect their changing economic circumstances. They may request waivers from the Food and Nutrition Services (FNS) division of the USDA for areas experiencing high unemployment or insufficient job availability. They may also receive a limited number of annual discretionary exemptions that can extend benefits for an additional month for non-compliant ABAWDs at risk of losing benefits. This policy framework reflects the balance Congress has attempted to strike between encouraging workforce participation and ensuring food security for vulnerable populations.

Federal History of SNAP Work Requirements

Introduction of SNAP Work Requirements for ABAWDs and the Great Recession

While General Work Requirements have existed since the 1970s, in 1996, the modern framework for SNAP (then called Food Stamps) work requirements for ABAWDs began with the bipartisan Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA), which in part introduced stringent time limits for nearly a million SNAP recipients (Stavrianos & Nixon, 1998). Under Section 824 of the Act, ABAWDs—individuals aged 18–49 without dependents and deemed physically and mentally fit—were restricted to three months of benefits within 36 months unless they met specific work requirements. States retained limited authority to request the USDA’s Food and Nutrition Services (FNS) to exempt ABAWDs from these requirements in areas with unemployment rates above 10% or if the area was determined to “not have a sufficient number of jobs to employ the individuals” (PRWORA, 1996). The USDA-FNS later operationalized the latter exception to mean a “labor surplus area” or, by the department’s definition, an area which for a recent two-year period has had an average unemployment rate 20% greater than the national unemployment rate. This policy encouraged employment and self-sufficiency, aligning with broader welfare reform goals of the mid-1990s.

The Balanced Budget Act (BBA) of 1997 refined these requirements by allowing states discretionary exemptions to exclude up to 15% of their ABAWD caseload from the three-month limit. As estimated by the Secretary of Agriculture, the number of case-month exemptions equaled 15% of the annual anticipated non-waived ABAWD population, and unused exemptions could be carried over from year to year (BBA, 1997). In response to the Great Recession, the American Recovery and Reinvestment Act (ARRA) of 2009 temporarily suspended ABAWD time limits nationwide, ensuring that no ABAWD lost SNAP eligibility due to the three-month limit from April 2009 through September 2010 (ARRA, 2009). Around roughly the same time, the Temporary Emergency Unemployment Compensation (EUC) program, enacted in 2008, extended unemployment benefits to individuals who had exhausted their regular state benefits (SAA, 2008). States eligible for the EUC, as determined by the Department of Labor, were also eligible for a 12-month statewide waiver of the ABAWD time limit (USDA FNS, 2009). As a result, many areas had waivers in place until 2016, when they began to be phased out more broadly (Harris, 2019). This phasing-out period post-2010 and especially post-2016 has become a key focus for researchers examining the impacts of SNAP work requirements on ABAWDs, as it introduces

more substantial variation in waiver status across geography and time that allows researchers to isolate better and measure the specific effects of the work requirement policy.

The 2014 Farm Bill and SNAP E&T Pilots

The Agricultural Act of 2014, which reauthorized SNAP through 2018, allocated \$200 million for ten SNAP Employment and Training (E&T) pilot programs aimed at testing strategies to help SNAP participants gain employment and reduce reliance on public assistance. Grants were awarded in 2015 to ten states, including Kentucky, where the Paths 2 Promise (P2P) pilot program was launched in eight Promise Zone counties in eastern Kentucky. P2P provided intensive case management, supportive services, and employment opportunities for primarily SNAP work registrants and concluded in July 2019. Final evaluation reports, published by the USDA Food and Nutrition Service in May 2022, offer insights into the pilot program's outcomes and cost-effectiveness (Rowe et al., 2022).

Increased Impact of Work Requirements in Recent Years

In 2019, under the Trump administration, the USDA's Food and Nutrition Service (FNS) issued a final rule attempting to restrict states' ability to waive ABAWD work requirements by narrowing eligibility criteria. This included requiring areas to have unemployment rates at or above 6% to qualify (rather than only the broader "20% above the national average" threshold) as well as effectively eliminating statewide waivers, limiting the ability to group counties for waiver purposes, and restricting the carryover of unused discretionary exemptions (Supplemental Nutrition Assistance Program, 84 Fed. Reg. 66782, 2019). A federal court blocked the rule in March 2020 before it could take effect and was struck down entirely by October 2020 on several grounds, including a lack of sufficient reasoning given by the USDA for the policy change (District of Columbia v. U.S. Department of Agriculture, 2020). In response to the COVID-19 pandemic, there was a nationwide time-limit waiver for SNAP work requirements from April 2020 through the end of June 2023 per the Families First Coronavirus Response Act (FFCRA, 2020).

Most recently, the Fiscal Responsibility Act (FRA) of 2023 significantly modified SNAP work requirements, incrementally raising the ABAWD age limit from 49 to 54 by October 2024. The FRA also introduced new status exemptions for veterans, individuals experiencing homelessness, and young adults under 24 who have aged out of the foster care system while simultaneously reducing states' discretionary exemption allotments from 15% to 8% and eliminating the carryover of unused exemptions (FRA, 2023). This represented the most major legislative change to SNAP work requirements since 1996.

Kentucky State Enforcement of SNAP Work Requirements

Administration of SNAP Work Requirements for ABAWDs

The Kentucky Cabinet for Health and Family Services administers SNAP work requirements for ABAWDs per Kentucky Administrative Regulations (921 KAR 3:027). It may request waivers under Kentucky Revised Statutes Title XVII, Economic Security and Public Welfare § 205.178, for counties experiencing high unemployment (at least 10%) or other severe economic conditions. In practice, this standard aligns with the USDA's definition of a labor surplus area—an area with an unemployment rate at least 20% higher than the national average over a recent period of two calendar years. In addition, Kentucky statute explicitly prohibits the state from pursuing discretionary waivers under federal law, 7 U.S.C. § 2015(o)(6).

Timeline of Waiver Implementation and Policy Changes

Following the expiration of statewide waivers granted under the American Recovery and Reinvestment Act (ARRA) and the recovery period after the Great Recession, Kentucky reinstated SNAP work requirements for ABAWDs beginning in January 2016 during Governor Matt Bevin's administration (Waxman & Joo, 2019). Initially reinstated in select counties, these requirements expanded statewide by May 2018, excluding eight counties participating in the Paths 2 Promise E&T pilot (Spalding, 2019). Later, under Governor Andy Beshear, Kentucky received statewide waivers beginning in April 2023, as authorized by the Families First Coronavirus Response Act of 2020. After these pandemic-related waivers ended on June 30, 2023, exemptions reverted to being determined by county-level economic conditions and approval by USDA-FNS in accordance with state and federal law. The most recent USDA-approved waiver exempts 117 out of Kentucky's 120 counties from December 1, 2024, through November 30, 2025 (USDA, 2025).

In recent years, the Kentucky General Assembly has considered several legislative proposals to restrict further the Cabinet's ability to request county waivers from ABAWD time limits. In 2022, HB 7 initially proposed requiring General Assembly approval before the Cabinet could request exemptions, which would have significantly limited the Cabinet's ability to respond promptly to changing economic conditions (Pugel & Klein, 2022). However, this provision was removed through a Senate floor amendment before the bill's enactment. More recently, during the 2024 legislative session, HB 367 included a similar proposal, which likewise would have restricted timely responsiveness; however, the bill ultimately did not pass, failing to advance out of the Senate Economic Development, Tourism, and Labor Committee (H.B. 367, 2024).

ABAWD Tracking System and the Employment and Training (E&T) Program

In Kentucky, SNAP work requirements for ABAWDs are administered by the Department for Community Based Services (DCBS), a Cabinet for Health and Family Services division. ABAWDs residing in non-waived counties must meet an 80-hour monthly threshold through work, volunteer activities, or participation in the state's Employment and Training (E&T) program to maintain

eligibility beyond the initial three-month limit within 36 months. To support ABAWDs in meeting this requirement, the state offers the voluntary E&T program statewide. Delivered in partnership with several community-based organizations, the E&T program provides key resources aimed at helping participants achieve economic self-sufficiency, including employment assistance, vocational training, GED courses, financial literacy education, and support services such as transportation and childcare assistance.

DCBS employs a systematic process to monitor ABAWD compliance. This involves verifying eligibility, work registration status, and adherence to work requirements when individuals apply for or recertify SNAP benefits. Additionally, Kentucky utilizes a structured tracking system where each SNAP recipient aged 18 to 54 is assigned an ABAWD tracking code, regardless of their county of residence. Caseworkers review these codes monthly to ensure compliance and promptly process any changes in recipients' status, such as updates to employment, exemption status, or household composition, following detailed procedures outlined in the DCBS Operations Manual (Kentucky Cabinet for Health and Family Services, 2024).

Independent Data Analysis of Waived vs. Non-waived Counties in Kentucky (2017-2024)

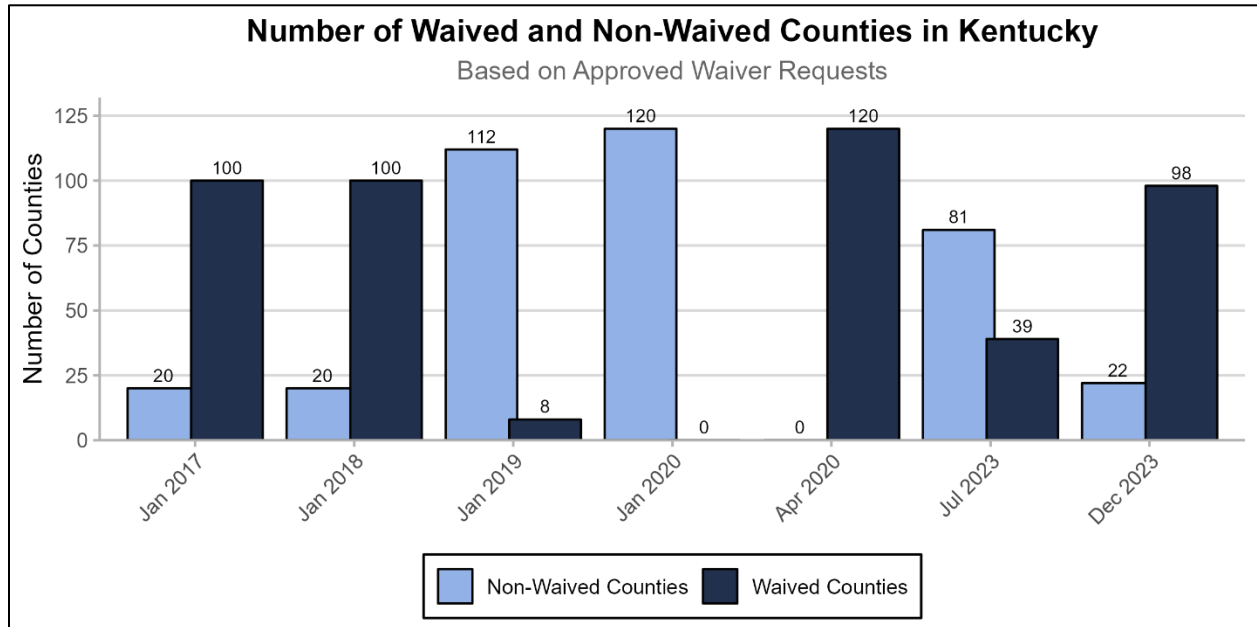
Recent descriptive data on Kentucky counties by waiver status are limited, creating a significant gap in understanding the state's policy context. To address this gap, an independent data cleaning and analysis process was conducted, integrating multiple datasets to examine demographic, economic, and program characteristics. This analysis provides a foundation for future research and policy discussions on Kentucky-specific SNAP work requirement policies.

Introduction:

From April 2020 through June 2023, Kentucky operated under a statewide waiver of SNAP work requirements for ABAWDs, authorized in response to the COVID-19 public health emergency. Outside this period, the number of counties approved by USDA for waivers has fluctuated based on economic conditions, by federal guidelines. Under the Bevin administration, most counties were gradually phased out of waivers between 2016 and 2018 as part of a policy shift to reimpose SNAP work requirements on ABAWDs.

This independent analysis focuses on county-level waiver approvals as determined by USDA-FNS rather than the state's month-to-month policy decisions during Governor Bevin's administration (Figure 1). Examining waiver determinations at the federal level provides a more stable and comparable measure of how economic conditions influenced waiver eligibility over time, separate from administrative discretion at the state level. Following Bevin's tenure and the expiration of pandemic-related waivers in July 2023, county exemptions have been determined by the Kentucky Cabinet for Health and Family Services using unemployment data. They are subject to USDA-FNS approval in line with federal and state guidelines. See figures 2-8 in the attached Appendix for maps illustrating the geographic distribution of county-waiver changes in Kentucky.

Figure 1



Source: USDA Food and Nutrition Service, 2025; Author's calculations.

Notes: The chart shows the number of Kentucky counties with and without an approved waiver of the SNAP time limit for Able-Bodied Adults Without Dependents (ABAWDs) on select dates from 2017 to 2023. Waived counties were deemed exempt from enforcing the three-month time limit due to USDA-approved waivers. Non-waived counties were required to enforce the time limit for ABAWDs not meeting work requirements. Counts reflect the number of counties under each waiver status at the time of approval.

Data:

This independent analysis utilizes county-level data from 2017 to 2024, collected as of November 2024, although some variables are unavailable in the later years of the study period. The American Community Survey (ACS) provides data on education, population, poverty, and race, which are supplemented by Census Bureau population estimates to address gaps and to enable the calculation of weighted averages for counties with and without waivers. Food insecurity and rurality measures are drawn from the annual County Health Rankings and Roadmaps.

Kentucky-specific data include statistics on Able-Bodied Adults Without Dependents (ABAWDs), obtained through correspondence with the Kentucky Cabinet for Health and Family Services, and county waiver status data sourced from the United States Department of Agriculture's Food and Nutrition Service (USDA-FNS). Labor market indicators, including unemployment rates, are sourced from the Bureau of Labor Statistics' Local Area Unemployment Statistics (LAUS), while quarterly wage data are drawn from the Quarterly Census of Employment and Wages (QCEW).

Together, these datasets provide a comprehensive view of Kentucky counties' economic, demographic, and program characteristics, enabling detailed longitudinal comparisons between those with and without waivers.

Findings:

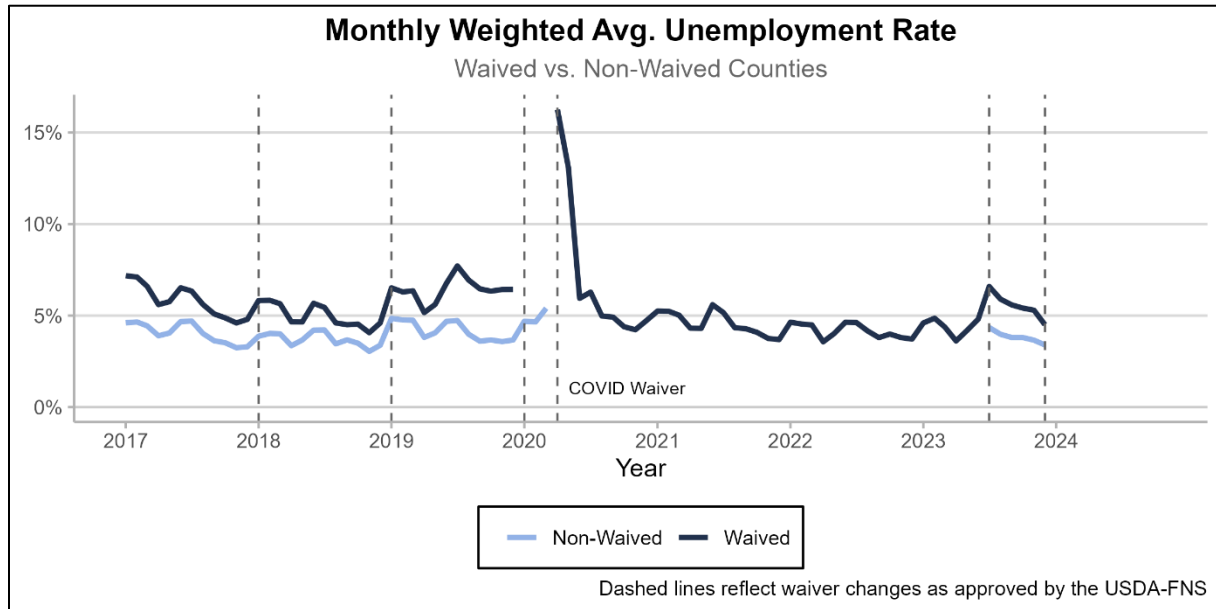
Between 2017 and 2023, Kentucky counties approved for USDA waivers of the SNAP time limit for Able-Bodied Adults Without Dependents (ABAWDs) consistently demonstrated greater socioeconomic challenges than counties without waivers. Waived counties reported higher unemployment rates and lower average weekly wages than non-waived counties throughout the period (Figures 9 and 10).

Demographic trends reveal that waived counties had higher percentages of residents identifying as non-Hispanic white and a larger share of rural populations. In contrast, non-waived counties had more racial and ethnic diversity, with higher proportions of non-Hispanic black and Hispanic/Latino populations. Educational attainment was also lower in waived counties, where a smaller share of adults held high school diplomas or bachelor's degrees (Figures 11-16).

Economic hardship indicators further underscored the differences between the two groups. Waived counties consistently experienced higher poverty rates and higher levels of food insecurity than non-waived counties, reflecting broader patterns of economic distress and reliance on supplemental nutritional supports (Figures 17 and 18).

These findings suggest that USDA-approved waivers in Kentucky have predominantly been granted to areas of the state facing systemic socioeconomic disadvantages beyond their higher unemployment rates. The alignment between waiver status and indicators of economic hardship highlights the role of waivers as an effective policy response to localized economic need. Further research is warranted to assess the long-term implications of waiver policies on economic stability and health outcomes for SNAP participants, particularly as pandemic-era flexibilities have expired and federal legislation has expanded the reach of SNAP work requirements.

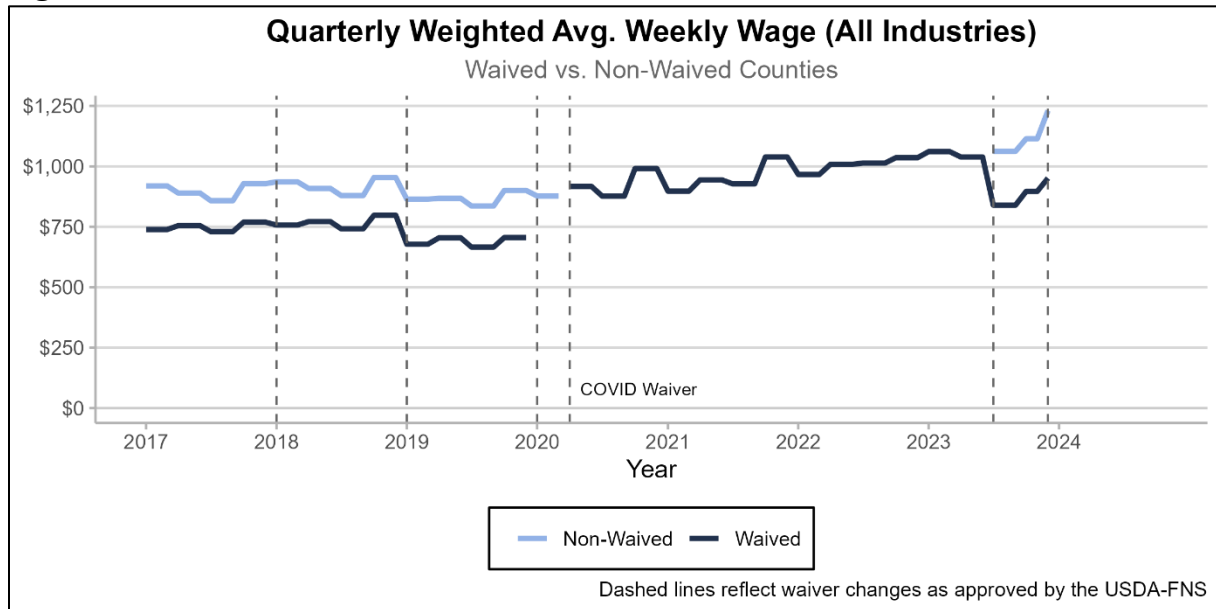
Figure 9



Source: USDA Food and Nutrition Service; Bureau of Labor Statistics (BLS) Local Area Unemployment Statistics (LAUS); Author's Calculations

Notes: Monthly weighted average unemployment rates for Kentucky counties with and without USDA-approved waivers of the SNAP time limit for Able-Bodied Adults Without Dependents (ABAWDs). Rates are based on Bureau of Labor Statistics (BLS) Local Area Unemployment Statistics (LAUS) and are weighted by county population.

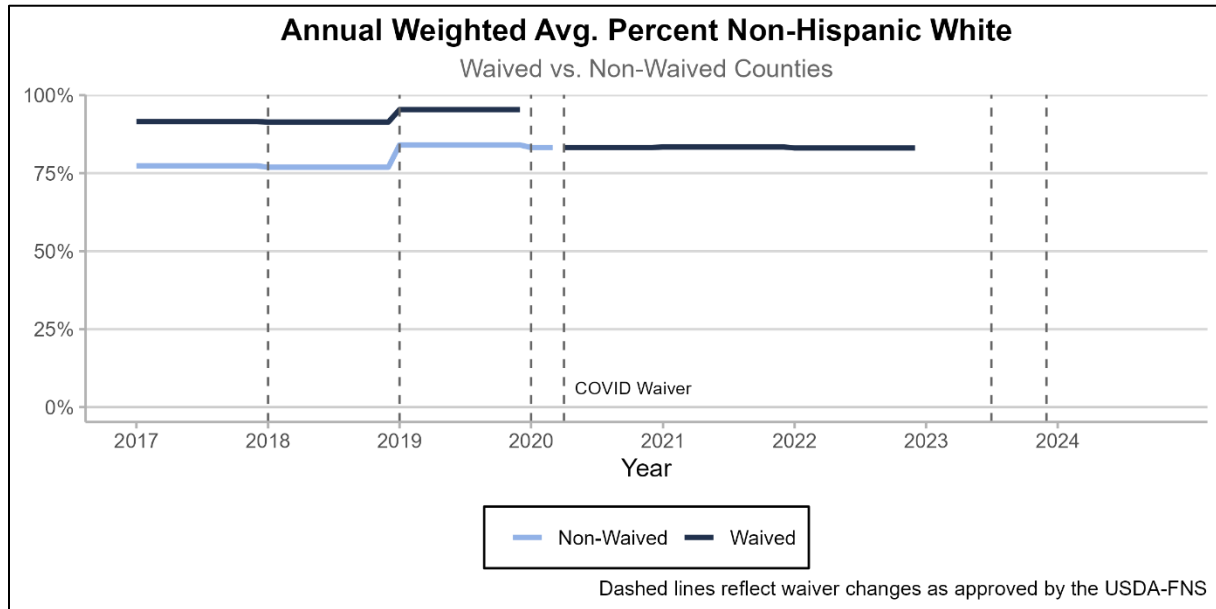
Figure 10



Source: USDA Food and Nutrition Service; Bureau of Labor Statistics (BLS) Quarterly Census of Employment and Wages (QCEW); Author's Calculations

Notes: Quarterly weighted average weekly wages for Kentucky counties with and without USDA-approved waivers of the SNAP time limit for Able-Bodied Adults Without Dependents (ABAWDs). Wage data are sourced from the Bureau of Labor Statistics (BLS) Quarterly Census of Employment and Wages (QCEW) and are weighted by county population.

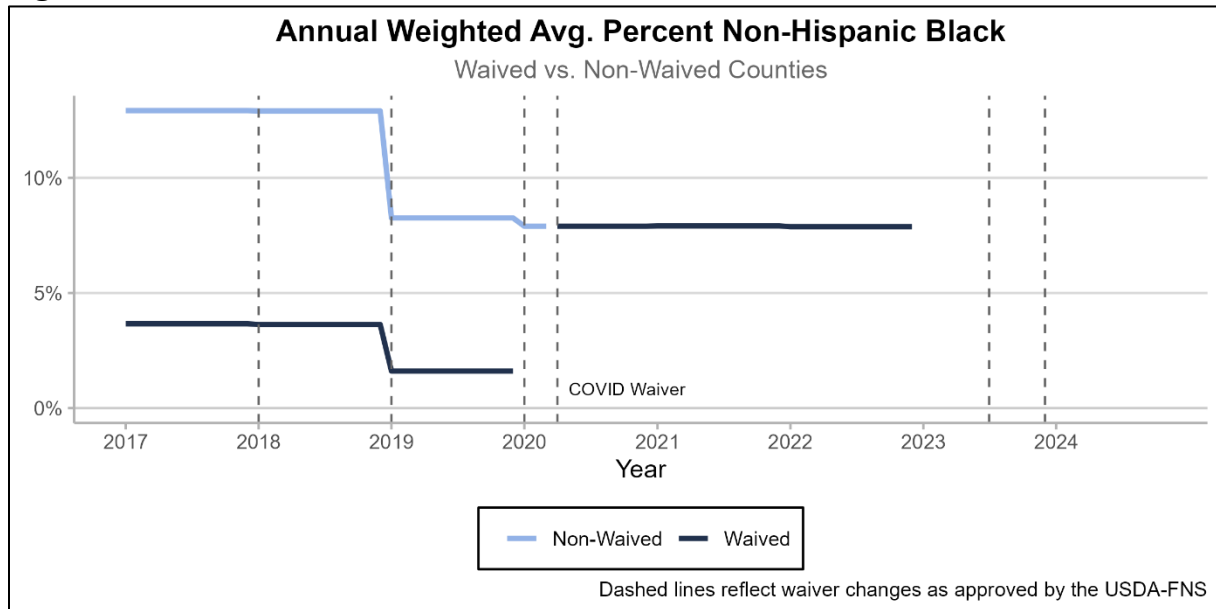
Figure 11



Source: USDA Food and Nutrition Service; American Community Survey (ACS) 5-Year Estimates; Author's calculations

Notes: Annual weighted average percentage of Non-Hispanic White residents in Kentucky counties with and without USDA-approved waivers of the SNAP time limit for Able-Bodied Adults Without Dependents (ABAWDs). Data are sourced from the ACS 5-Year Estimates and are weighted by county population.

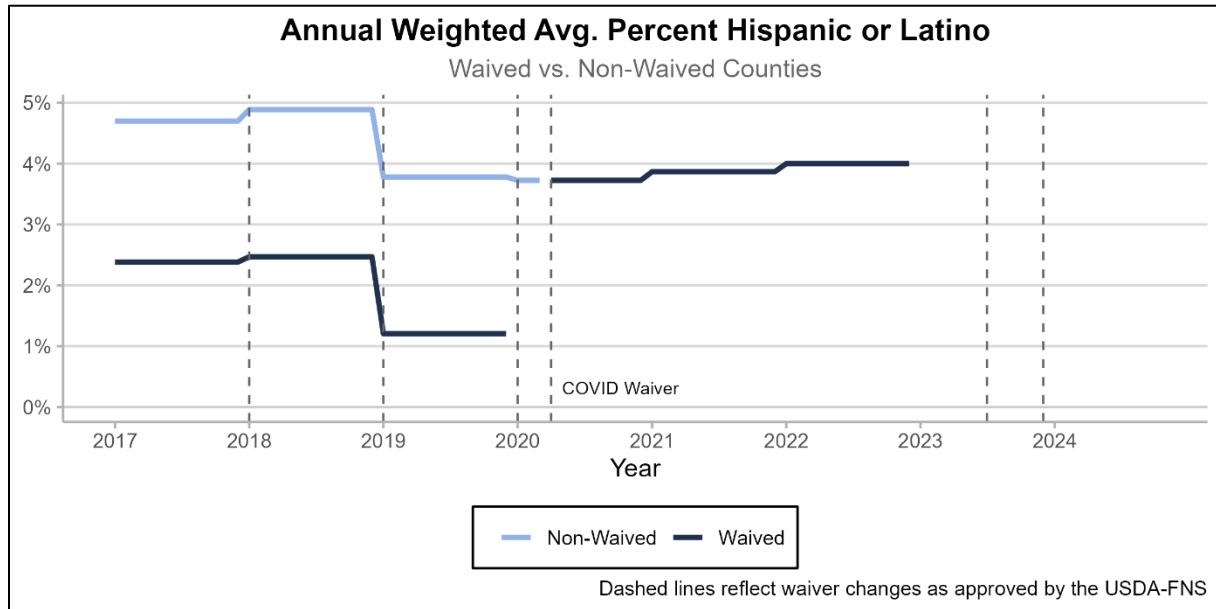
Figure 12



Source: USDA Food and Nutrition Service; American Community Survey (ACS) 5-Year Estimates; Author's calculations

Notes: Annual weighted average percentage of Non-Hispanic Black residents in Kentucky counties with and without USDA-approved waivers of the SNAP time limit for Able-Bodied Adults Without Dependents (ABAWDs). Data are sourced from the ACS 5-Year Estimates and are weighted by county population.

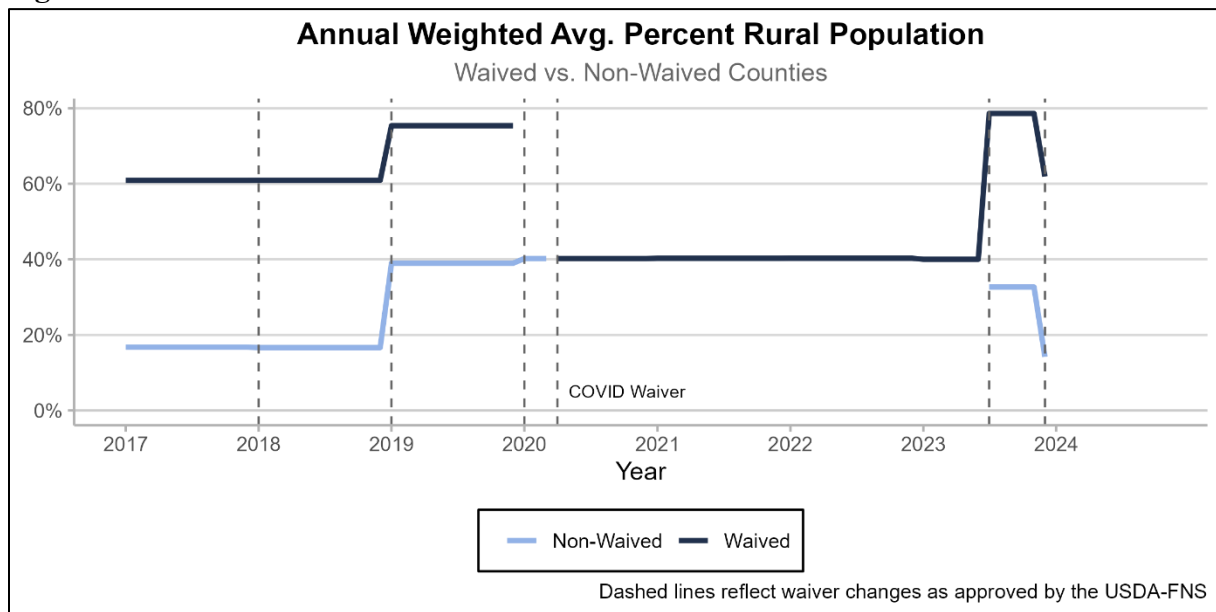
Figure 13



Source: USDA Food and Nutrition Service; American Community Survey (ACS) 5-Year Estimates; Author’s calculations

Notes: Annual weighted average percentage of Hispanic or Latino residents in Kentucky counties with and without USDA-approved waivers of the SNAP time limit for Able-Bodied Adults Without Dependents (ABAWDs). Data are sourced from the ACS 5-Year Estimates and are weighted by county population.

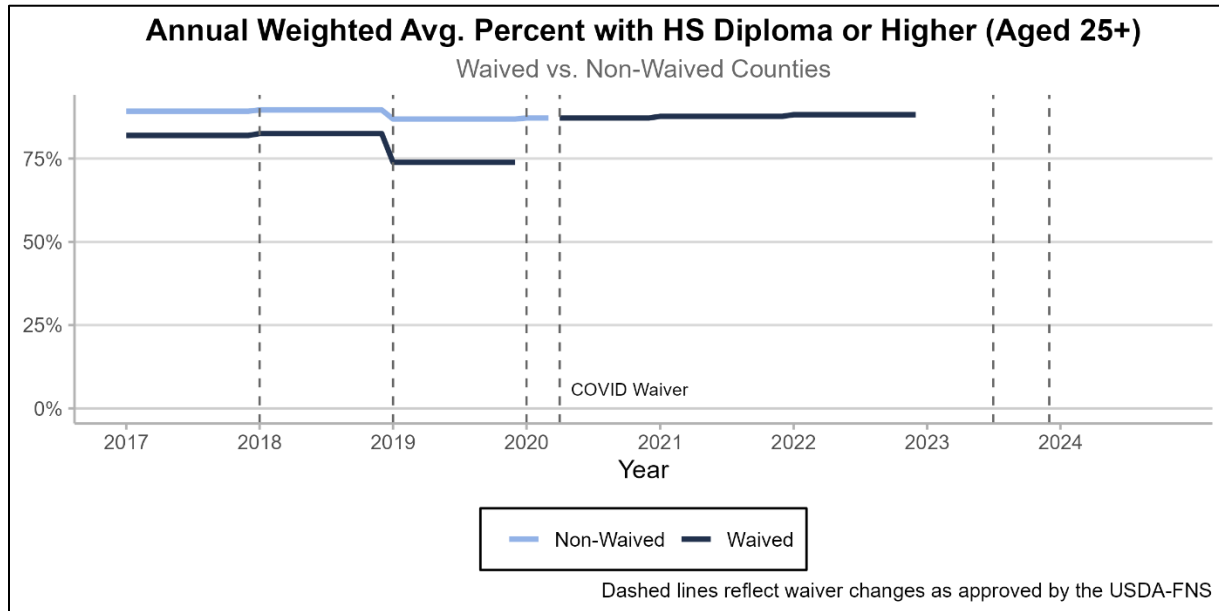
Figure 14



Source: USDA Food and Nutrition Service; County Health Rankings & Roadmaps; Author’s calculations

Notes: Annual weighted average percentage of rural population in Kentucky counties with and without USDA-approved waivers of the SNAP time limit for Able-Bodied Adults Without Dependents (ABAWDs). Data are sourced from County Health Rankings & Roadmaps and are weighted by county population.

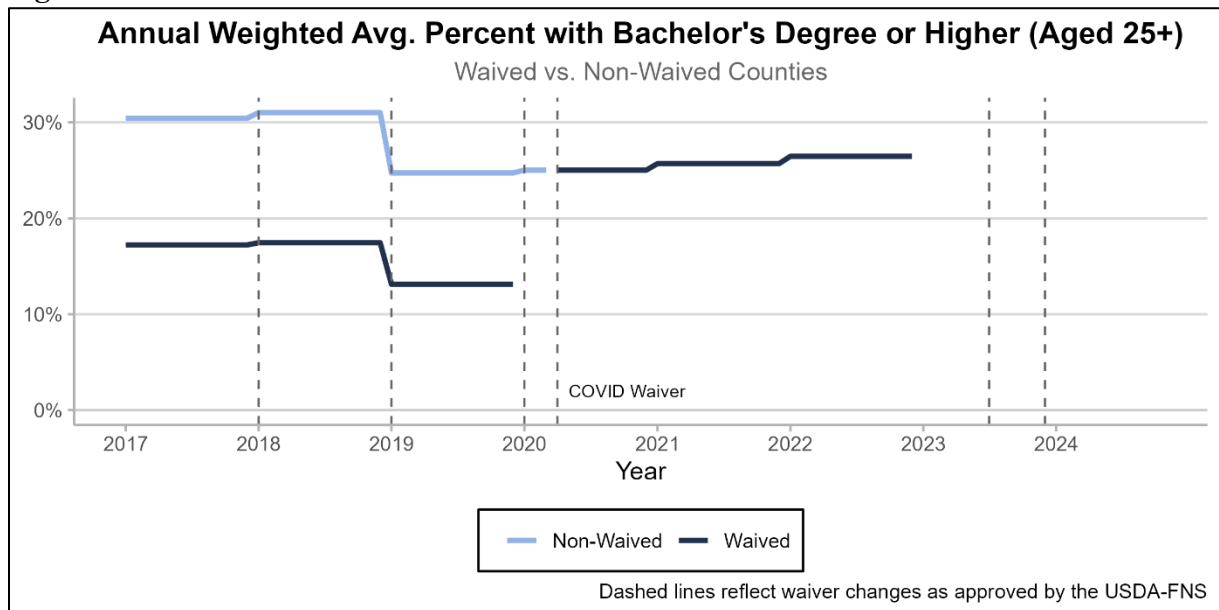
Figure 15



Source: USDA Food and Nutrition Service; Bureau of Labor Statistics (BLS) Quarterly Census of Employment and Wages (QCEW); Author's Calculations

Notes: Annual weighted average percentage of adults aged 25 and older with a high school diploma or higher in Kentucky counties with and without USDA-approved waivers of the SNAP time limit for Able-Bodied Adults Without Dependents (ABAWDs). Data are sourced from the ACS 5-Year Estimates and are weighted by county population.

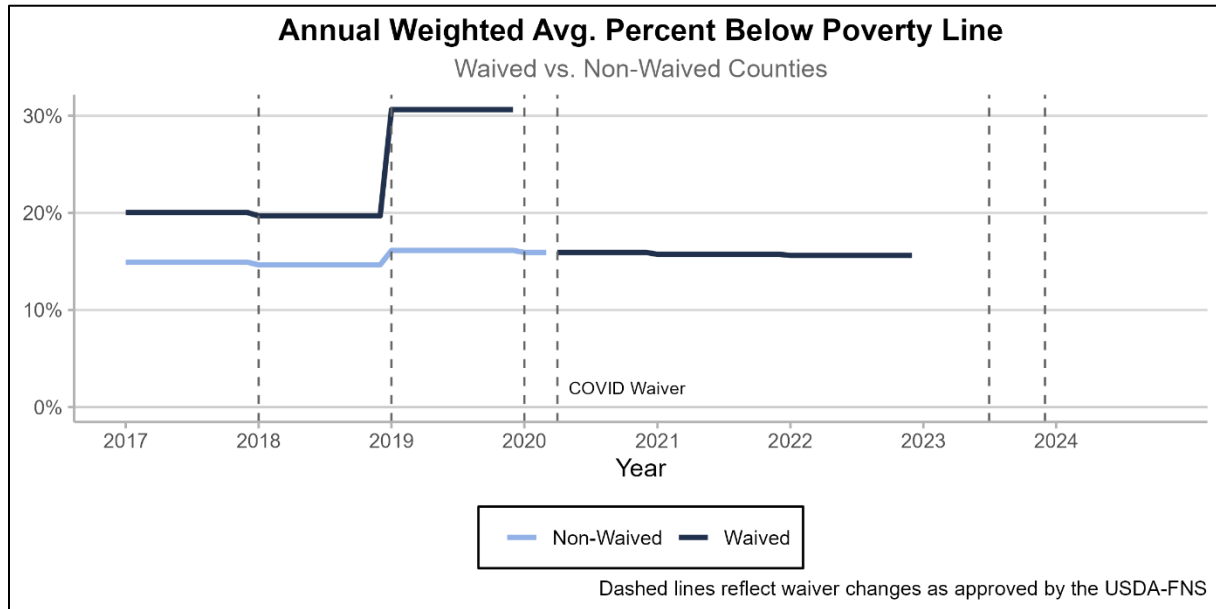
Figure 16



Source: USDA Food and Nutrition Service; American Community Survey (ACS) 5-Year Estimates; Author's calculations

Notes: Annual weighted average percentage of adults aged 25 and older with a bachelor's degree or higher in Kentucky counties with and without USDA-approved waivers of the SNAP time limit for Able-Bodied Adults Without Dependents (ABAWDs). Data are sourced from the ACS 5-Year Estimates and are weighted by county population.

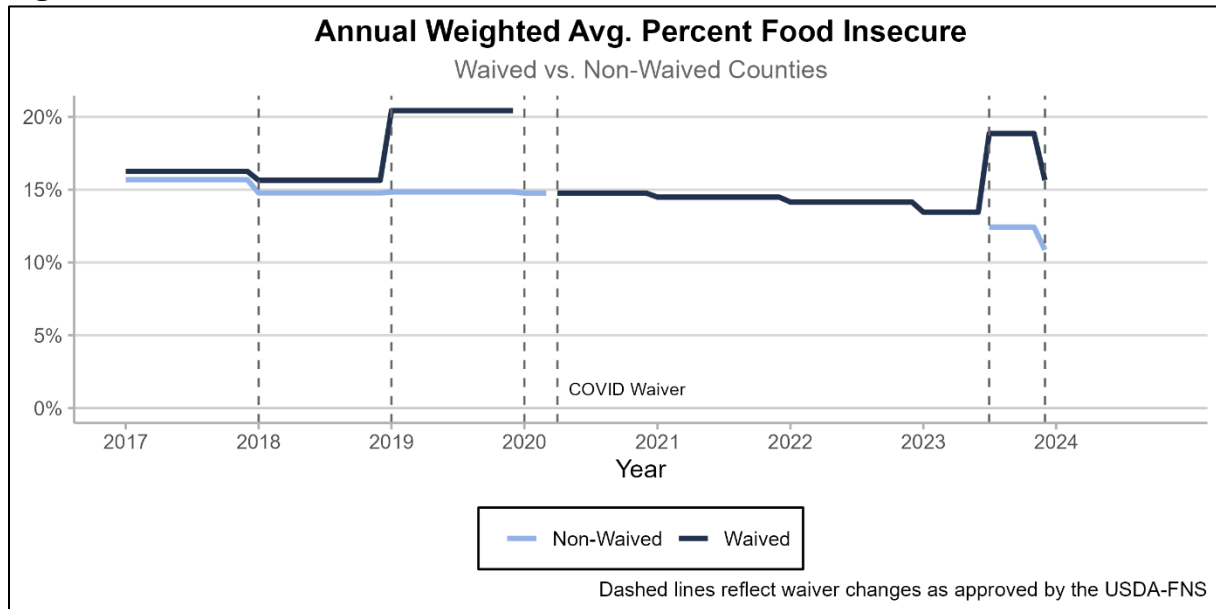
Figure 17



Source: USDA Food and Nutrition Service; American Community Survey (ACS) 5-Year Estimates; Author's calculations

Notes: Annual weighted average percentage of individuals living below the poverty line in Kentucky counties with and without USDA-approved waivers of the SNAP time limit for Able-Bodied Adults Without Dependents (ABAWDs). Data are sourced from the ACS 5-Year Estimates and are weighted by county population.

Figure 18



Source: USDA Food and Nutrition Service; County Health Rankings & Roadmaps; Author's calculations

Notes: Annual weighted average percentage of food-insecure individuals in Kentucky counties with and without USDA-approved waivers of the SNAP time limit for Able-Bodied Adults Without Dependents (ABAWDs). Data are sourced from County Health Rankings & Roadmaps and are weighted by county population.

Current Debate

Over the past year, the debate over SNAP work requirements for Able-Bodied Adults Without Dependents (ABAWDs) has continued to focus on whether these policies incentivize employment or create structural barriers to accessing food assistance. Some analysts argue that SNAP benefits reduce incentives to work by imposing high marginal tax rates as earnings increase. A recent piece published by the Manhattan Institute (Cronin, 2024) contends that work requirements can help mitigate these disincentives by encouraging labor force participation among ABAWDs. Similarly, a separate piece published by the American Enterprise Institute (Burkhauser et al., 2025) argues that states frequently exploit waiver provisions to avoid enforcing work requirements, even in areas where employment opportunities exist. Burkhauser and his coauthors recommend stricter federal oversight to ensure that work-capable adults are engaged in employment or training as a condition of SNAP receipt.

Opponents of ABAWD work requirements argue that the policy is punitive and ineffective, rooted more in ideological assumptions than empirical evidence. The Economic Policy Institute (Wething, 2025) contends that work requirements fail to address low-income adults' barriers, such as lack of stable job opportunities, caregiving responsibilities, health challenges, and volatile work schedules. Commentary from Brookings (Khan, 2025) additionally cites peer-reviewed research consistently showing that these requirements do not meaningfully increase employment or earnings but lead to significant reductions in SNAP participation—often by imposing complex administrative burdens that eligible individuals struggle to meet. Critics emphasize that most ABAWDs are already working or actively seeking employment (Vericker et al., 2021) and that tying essential benefits like food assistance to rigid work rules exacerbates food insecurity and worsens health outcomes. Rather than promoting self-sufficiency, opponents view work requirements as a cost-cutting measure restricting access to vital support systems and increasing hardship for some of the most economically vulnerable populations. These debates highlight the tension between policies encouraging work and the realities faced by low-income individuals navigating insecure and unstable job markets.

The following section reviews the academic literature on SNAP work requirements, focusing on empirical evidence examining their impacts on program participation, employment, earnings, and health outcomes among the ABAWD population.

Literature Review

Introduction

The imposition of work requirements stems from a policy goal to incentivize labor force participation among benefit recipients while maintaining a safety net for those in need. Theoretically, these requirements balance two oftentimes conflicting objectives: reducing welfare dependency and ensuring vulnerable populations are not excluded from assistance (Besley & Coate, 1992).

Researchers often focus on the post-Great Recession and pre-COVID period to study SNAP work requirements because it presents a valuable natural experiment. The widespread suspension of ABAWD time limits under the American Recovery and Reinvestment Act (ARRA) in 2009, combined with extended unemployment benefits through the Temporary Emergency Unemployment Compensation (EUC) program, kept many areas across the United States under ABAWD waivers until 2016. After 2010 and especially following the expiration of waiver eligibility under EUC, economic conditions gradually improved, and waivers were phased out in certain states and counties. This created variation in policy exposure across states and localities (Harris, 2019). That variation in timing has become a key focus for researchers, allowing for more precise comparisons between similar ABAWDs in areas or during periods with and without exposure to work requirements. These comparisons help improve understanding of the specific effects of work requirements on SNAP participation, labor force outcomes, and related health outcomes.

Challenges in Measuring the Effects of Work Requirements

Accurately assessing the effects of SNAP work requirements on ABAWDs is challenging. The difficulties stem from limitations in available data, the complexity of establishing causality, and considerable variation in the ABAWD population and how policies are implemented across states. One of the central challenges involves the data sources researchers typically rely on. National surveys such as the Current Population Survey (CPS) and the American Community Survey (ACS) provide broad coverage and detailed demographic information but depend on self-reported data by survey respondents. This introduces well-documented risks of recall bias and misreporting, particularly regarding employment status and participation in programs like SNAP. Individuals may forget, misunderstand, or choose not to report their experiences accurately. Studies consistently show that these surveys underreport SNAP participation and misclassify labor force status. These reporting errors are not random—they are often linked to important individual and household characteristics, such as income, education level, and family composition (Baum-Snow et al., 2009; Borjas & Hamermesh, 2023; Halpern-Manners et al., 2017; Meyer et al., 2022; Meyer & Mittag, 2019). Moreover, the extent of these errors may vary depending on the policy environment and the population being studied. As a result, making accurate comparisons and drawing reliable conclusions about the effects of SNAP work requirements becomes more difficult when using survey data.

In addition, the broad sampling frames of national surveys include many individuals who are not subject to SNAP work requirements or are unlikely to participate. As a result, studies using these data may struggle to identify precisely the population affected by the policy or may misidentify their characteristics. This can reduce precision and weaken internal validity, potentially contributing to the mixed findings in survey-based research on SNAP work requirements, particularly due to differences in how SNAP recipients and ABAWDs are defined and characterized (Gray et al., 2023; Keene, 2024).

While linked administrative data, such as SNAP case files and Unemployment Insurance (UI) wage records, provide some of the strongest estimates of employment and program participation—allowing researchers to track both earnings and SNAP receipt over time for the same individuals (Gray et al., 2023)—they also have important limitations. These datasets may exclude identifying some small but relevant groups, such as self-employed individuals or those receiving income from undocumented sources. In addition, they may lack detailed demographic, labor force, or health-related information needed to assess employment status, exemption eligibility, or subgroup impacts, particularly when they are not linked to SNAP case files (Cook & East, 2024). These gaps, if they exist in a study, can make it more challenging to understand which ABAWDs are most affected by work requirements, how they are affected, and the mechanisms driving those outcomes.

Methodological challenges further complicate efforts to isolate the causal effects of work requirements. All studies to date rely on quasi-experimental approaches, such as comparing outcomes in areas where waivers were phased out to those where they remained in place, assuming the pre-treatment trends between these states were the same, or comparing ABAWDs that are just above and below the age-cutoff, assuming that these two groups are similar in roughly every way except for their exposure to the work requirement policy. However, these methods rest on assumptions that may be difficult to fully verify, such as similar pre-policy trends in outcomes between comparison groups. Furthermore, the varying ways researchers define their specific study populations—whether by age range, geography, income level, participation status, or other criteria—also impact the comparability and generalizability of findings, contributing to heterogeneity in results across the literature. Waivers are often granted based on local economic conditions, introducing potential endogeneity into analyses—areas with waivers may have weaker labor markets that independently affect ABAWD outcomes, making it hard to disentangle the effect of the policy from broader economic trends (Lippold and Levin, 2021). Additionally, the design and enforcement of work requirements, including the administration of Employment and Training (E&T) programs and exemption policies, vary widely by state (Wheaton et al., 2021). This heterogeneity creates further challenges in drawing generalizable conclusions about the impact of work requirements, especially for studies focusing on only a small subset of states.

Reviewing the Evidence

In light of these challenges, interpreting the existing research on SNAP work requirements for ABAWDs requires careful consideration of the strengths and limitations of different data sources.

While a substantial body of evidence examines the impacts of these policies on SNAP participation, employment and earnings, and health outcomes, studies that rely on administrative data provide the most reliable and consistent causal estimates of these effects. Furthermore, they often address and account for the potential limitations of their data and study design, improving their case for causal inference. The following sections review the totality of the literature, however, highlighting areas of consensus and disagreement, but with particular weight given to findings from studies using administrative data in the subsequent analysis of policy alternatives. Additionally, the evaluation of Kentucky's Paths 2 Promise program is discussed (Rowe et al., 2022), offering insights into its expanded E&T benefits on work registrants in low-income counties, with implications that can be cautiously generalized to Kentucky's ABAWD population.

SNAP Participation Outcomes

A substantial body of research consistently demonstrates that SNAP work requirements for ABAWDs significantly reduce program participation. Across multiple studies, reductions in SNAP enrollment are observed following the implementation or reinstatement of these requirements. While the magnitude of the effect varies depending on the policy environment, population characteristics, and methodological approach, the overall pattern of decreased participation is well-established. Studies using administrative data and rigorous research designs tend to report larger and more precise estimates of disenrollment. Additionally, there is evidence of heterogeneity in the magnitude of participation losses across demographic groups and those with differing health risks.

SNAP Participation

The most robust evidence comes from studies leveraging administrative data with rigorous research designs. These studies draw on detailed, individual-level SNAP enrollment and earnings records, allowing researchers to track participation over time and precisely estimate the effects of work requirements on Able-Bodied Adults Without Dependents (ABAWDs). Gray et al. (2023) use administrative data from Virginia SNAP case records and Unemployment Insurance (UI) earnings files, employing a regression discontinuity (RD) design that exploits the age 50 cutoff, where individuals age out of ABAWD status. Their analysis finds a 53% decline in SNAP participation among ABAWDs within 18 months of the reinstatement of work requirements, with the greatest disenrollment effects for individuals experiencing homelessness or who had no earned income. Hall (2022) analyzes Maryland administrative data on SNAP participation and earnings, using difference-in-differences and fixed effects models to evaluate the impact of time limit waiver expirations in 2016. Hall finds a 65-percentage point drop in participation among ABAWDs in jurisdictions where waivers ended, compared to a 54-percentage point decline in areas where waivers remained in place. Similarly, Ndumele et al. (2025) utilize linked administrative datasets from the Connecticut Department of Social Services, combining SNAP and Medicaid enrollment data. Using a triple-differences design, they find a 5.9 percentage point decline in SNAP coverage following the reintroduction of work requirements, with the steepest losses among older adults, those managing chronic health conditions, and those with the lowest incomes.

Multi-state analyses further reinforce these findings. Wheaton et al. (2021) draw on administrative SNAP data from nine states—Alabama, Colorado, Maryland, Minnesota, Missouri, Oregon, Pennsylvania, Tennessee, and Vermont—applying multivariate regression techniques to assess changes in participation before and after the reinstatement of ABAWD time limits. Their study finds participation declines of 5 to 41 percentage points twelve months after the policy change. Vericker et al. (2023) conducted a more focused analysis using monthly administrative SNAP data from Colorado, Missouri, and Pennsylvania and employed quasi-experimental methods to examine the effects of time limit reinstatement in 2016. They report reductions in SNAP participation ranging from 7 to 32 percentage points one year after implementation. Across these studies, the pattern is consistent: reinstating SNAP work requirements for ABAWDs results in large, sustained reductions in program participation. The evidence also indicates that vulnerable subgroups—those with lower incomes, unstable housing, chronic health conditions, and limited work history—are disproportionately impacted by these policies.

Survey-based studies, while limited by potential underreporting of SNAP participation, generally corroborate the findings from administrative data—demonstrating that SNAP work requirements for ABAWDs lead to significant reductions in program participation. Using ACS data from 2012 to 2017, Brantley et al. (2020) employ difference-in-differences and triple-differences models to estimate that ABAWD work requirements reduced SNAP participation by 4 percentage points—equivalent to a 21% decline—with larger effects among non-Hispanic Black and Hispanic adults. Harris (2021) similarly uses ACS data from 2010 to 2017, finding a 1.7 percentage point decrease in participation following the reimposition of work requirements. Han (2022), using regression discontinuity and difference-in-differences approaches with ACS data, reports similar rates of decline.

Additional studies reinforce these patterns. Ku et al. (2019) used county-level data from 2013 to 2017 and found a 3% reduction in overall SNAP participation following the imposition of work requirements, implying a substantial decrease in participation amongst ABAWDs. Lippold and Levin (2021) similarly show that removing waivers leads to a decrease in overall SNAP participation of 0.7% for counties just at the unemployment threshold. Together, these survey-based analyses confirm that work requirements reduce SNAP participation, with disproportionate impacts on vulnerable subgroups.

Summary

The evidence consistently finds that SNAP work requirements for Able-Bodied Adults Without Dependents (ABAWDs) lead to substantial reductions in program participation. The most significant finding comes from Gray et al. (2023), who found a 53 percent reduction in overall SNAP participation amongst ABAWDs in Virginia following the reinstatement of work requirements. Other administrative data studies, such as Hall (2022), Ndumele et al. (2025), Wheaton et al. (2021), and Vericker et al. (2023), corroborate these findings.

Survey-based studies, which rely on ACS or CPS data, generally find smaller effects but reinforce the overall trend. Brantley et al. (2020) estimate a 4-percentage point decline in SNAP participation among childless adults without disabilities, while Harris (2021) and Han (2021) report estimates around 1.7 percentage points.

Overall, the evidence shows that work requirements reduce SNAP participation and disproportionately affect groups facing greater barriers to employment, including those with a lack of employment history, racial minorities, individuals with health complications, and those experiencing homelessness. While framed as promoting self-sufficiency, these policies come with an inherent tradeoff of restricting access to food assistance and, therefore, potentially increasing a participant's exposure to negative health outcomes.

Employment and Earnings Outcomes

A substantial body of research examines the impact of SNAP work requirements on ABAWD employment. While findings are not entirely uniform, the evidence indicates limited effects on employment levels or earnings. In contexts lacking sufficient job growth, these requirements effectively function as time limits, leading individuals unable to meet the mandated hours to lose benefits, regardless of personal effort or labor market conditions. Critically, investigations employing robust causal methodologies and administrative data sources frequently fail to detect statistically significant or sustained improvements in employment rates or earnings for those subject to the requirements. This suggests that any potential positive effects observed in some studies may be minor or short-lived.

Employment

A substantial body of evidence from administrative data shows that SNAP work requirements for ABAWDs do not lead to meaningful or sustained increases in employment. Gray et al. (2023) found no significant increase in employment among ABAWDs in Virginia 18 months after work requirements were reinstated. Their analysis ruled out employment gains larger than 3.5 percentage points. Hall (2022), analyzing data from Maryland, found virtually no change in employment among ABAWDs following the expiration of time limit waivers, with some estimates suggesting a slight decline. Similarly, Ndumele et al. (2025) observed large reductions in SNAP enrollment in Connecticut but no corresponding increase in Medicaid coverage. This suggests that most individuals leaving SNAP did not move into jobs offering health insurance or stable employment.

Findings from multi-state analyses reinforce this conclusion. Wheaton et al. (2021) documented employment declines of 2 to 4 percentage points in Colorado, Missouri, and Pennsylvania after time limits were reinstated. Vericker et al. (2023) reported similar results in the same three states, concluding there was no evidence that work requirements increased employment. Stacey et al. (2018) also found no significant impact on employment among ABAWDs, including subgroups facing greater work barriers, such as individuals with lower levels of education or those living in high-unemployment areas.

Survey-based studies offer mixed findings on the employment impacts of SNAP work requirements for ABAWDs. While some research suggests modest employment gains, most studies find little to no statistically significant effects. Harris (2021) reported a 1.3 percentage point increase in employment following the reimposition of work requirements, with stronger effects in urban areas and among Black ABAWDs, but no significant impact in rural areas. Han (2022) found similar modest effects on employment of 1.4 percentage points.

Barton (2024), using a difference-in-differences design with Current Population Survey (CPS) data, examined state-level reinstatements of work requirements. After controlling for demographic and economic factors, Barton found no statistically significant change in employment among SNAP-eligible ABAWDs, with point estimates near zero. Similarly, Feng (2021) used a triple-differences approach with Behavioral Risk Factor Surveillance System (BRFSS) data to assess employment impacts following the phase-out of waivers after the Great Recession. Feng found no significant changes in employment status attributable to the reinstatement of work requirements.

Cronin (2024) employed a two-way fixed-effects triple-differences model to analyze labor supply outcomes from 2010 to 2019. Cronin found small, statistically significant increases in employment—typically ranging from 2 to 5 percentage points—among low-income ABAWDs in counties with active work requirements. However, these effects varied depending on the model specification.

Earnings

The literature on earnings effects is less extensive but points to similarly limited impacts. Gray et al. (2023) found no statistically significant change in average earnings among ABAWDs in Virginia 18 months after reinstating work requirements. The study ruled out any average monthly earnings increases greater than \$28. Although there was limited evidence of earnings gains among a small group of participants near the eligibility cutoff, the authors cautioned against over-interpreting these findings due to their inconsistency and lack of precision.

Hall (2022), examining Maryland’s reinstatement of ABAWD time limits, found no causal link between work requirements and earnings. While quarterly earnings rose for ABAWDs over time in treatment and comparison areas, the study concluded that these gains were unrelated to the policy and reflected broader economic trends rather than the effect of work requirements.

Vericker et al. (2023) analyzed the reinstatement of ABAWD time limits in Colorado, Missouri, and Pennsylvania and found no evidence of improved annual earnings among those subject to the requirements. Earnings were significantly lower for the time-limit group in Colorado and Pennsylvania, with decreases ranging from \$247 to \$1,230 annually, or 4% to 20% compared to comparison groups. The findings suggest that higher earnings did not offset reductions in SNAP participation.

Additionally, the imposition of ABAWD work requirements exacerbates financial strain, particularly among low-income adults. Zhang and Fitzpatrick (2024), using NielsenIQ Consumer

Panel data from 2014–2019, found that waiving SNAP work requirements increased total household spending by 7 percent and food expenditure by 6 percent, with more pronounced effects among households at or near poverty levels. This suggests that the imposition of work requirements limits the financial resources available to meet basic needs. Dodini et al. (2024), using FRBNY/Equifax Consumer Credit Panel data from 2010–2017, found that new work requirements led to increased credit-seeking, higher credit balances, and more past-due debts, indicating that individuals subject to these requirements may turn to credit and debt to cover expenses after losing SNAP benefits.

Summary

Across the available studies, particularly those leveraging large-scale administrative datasets and robust causal inference methods, SNAP work requirements for ABAWDs consistently show little to no impact on employment or earnings. The upper bound on employment effects is modest, with Harris (2021) reporting a 1.3 percentage point increase, while Gray et al. (2023) rule out gains above 3.5 points, and Cronin (2024) finds increases upwards of 5 percentage points according to at least one specification. Earnings impacts are similarly limited, with no increases exceeding \$28 per month. Several studies find small but negative effects on both outcomes at the lower bound. Moreover, any observed gains are suggested to be concentrated among those already working or towards the higher end of the income ladder amongst SNAP recipients, not the most disadvantaged ABAWDs.

Health Outcomes

An expanding body of research has examined the consequences of SNAP Able-Bodied Adults Without Dependents (ABAWD) work requirements on food security and health. While these policies are intended to promote employment and self-sufficiency, studies consistently indicate that they may adversely affect the physical and mental well-being of those subject to the requirements. Direct and indirect measures of food insecurity, dietary quality, and health outcomes suggest that work requirements increase material hardship, particularly among populations already facing socioeconomic and health challenges.

Food Security and Nutritional Outcomes

Research examining food insecurity outcomes demonstrates that ABAWD work requirements are associated with increased difficulties in maintaining access to adequate nutrition. According to Zhang and Fitzpatrick (2024), waiving these requirements has been shown to increase household food expenditures by 6 to 7 percent and improve a subset of dietary quality, including a 9 percent rise in fruit and vegetable consumption. These findings suggest that imposing work requirements reduces households' resources for food, forcing trade-offs that may lead to poorer nutrition.

Cronin (2024) finds that ABAWDs subject to work requirements tend to report slightly, but not statistically significant, higher levels of food insecurity on a composite scale (0.1 to 0.2 percentage points), with significant effects concentrated among those working fewer than ten hours per week

(1.7 percentage points). For this group, the loss of SNAP benefits without a corresponding increase in work hours likely leads to greater hardship in maintaining consistent access to food.

Evidence from Cuffey et al. (2023) further supports these conclusions. Following the reintroduction of work requirements 2016 across Alabama, Florida, and Mississippi, food pantries in urban areas saw a 34 percent increase in households seeking assistance. This spike in food pantry usage indicates a heavier reliance on emergency food networks as individuals lost SNAP benefits due to unmet work requirements.

These findings suggest that SNAP work requirements may reduce households' ability to purchase adequate and nutritious food, with the most pronounced effects observed among those at or near poverty thresholds. This indicates a disproportionate impact on the food security and nutritional intake of the most economically vulnerable populations.

Other Health Outcomes

In addition to food insecurity, several studies have documented several other measures of adverse health effects resulting from ABAWD work requirements.

Feng (2021) found that reinstating the time limit increased physically unhealthy days by 14% among those losing eligibility, highlighting direct physical health deterioration. However, no immediate impact on self-reported mental health was observed. However, Allen et al. (2023) noted increased mental health care utilization in areas removing waivers; women showed higher visit probability and frequency, while men experienced increased anxiety and mood disorder visits, suggesting requirements elevate stress and service needs.

Furthermore, studies underscore disproportionate harm. Ndumele et al. (2025) documented a 25% overall SNAP coverage reduction after requirements returned, but the impact was much larger for vulnerable groups: individuals with chronic illnesses (like diabetes, 91% higher risk), older adults with comorbidities (553% higher risk), and the lowest-income households (204% higher risk) were significantly more likely to lose benefits compared to their counterparts.

Collectively, this evidence indicates SNAP work requirements can undermine physical health, increase mental health burdens, disproportionately affect the clinically and economically vulnerable, and jeopardize overall well-being by restricting access to crucial nutritional assistance.

Summary

The evidence strongly suggests that SNAP work requirements for ABAWDs increase food insecurity and contribute to adverse health outcomes, particularly among the most vulnerable populations. Studies demonstrate that imposing work requirements reduces access to adequate and nutritious food, with affected individuals often turning to emergency food assistance. Those with limited work hours or labor market attachment face the most significant risk of increased hardship.

Beyond food insecurity, research points to broader health impacts. Studies link SNAP work requirements to declines in physical health and increased reliance on mental health services. The loss of benefits appears to affect individuals with chronic health conditions disproportionately, raising concerns about reduced access to nutritional support and the potential worsening of health disparities.

Taken together, the evidence suggests that SNAP work requirements not only reduce program participation but also undermine food security and health, particularly for disadvantaged ABAWDs facing structural barriers to employment.

Kentucky Paths 2 Promise (2016-2019)

The Kentucky Paths 2 Promise (P2P) pilot was part of a national demonstration funded under the Agricultural Act of 2014 to test innovative SNAP Employment and Training (E&T) strategies. Implemented by the Kentucky Department for Community-Based Services (DCBS), P2P operated from April 2016 to April 2019 across eight southeastern Appalachian counties—Bell, Clay, Harlan, Knox, Leslie, Letcher, Perry, and Whitley. These counties, designated as a federal Promise Zone, faced high poverty rates and chronic unemployment. The pilot aimed to improve employment outcomes for SNAP recipients, particularly new and current work registrants not otherwise exempt from federal SNAP work requirements.

Prior to P2P, SNAP E&T services in Kentucky were limited. No formal SNAP E&T program existed in the pilot region, and participants largely depended on general workforce services through the Workforce Innovation and Opportunity Act (WIOA). P2P introduced a more comprehensive, voluntary model that included basic education, occupational training, work-based learning, job placement services, and intensive case management. Extensive support services—such as transportation and childcare assistance—were integral to participation. Additionally, the program offered job retention support for up to 90 days post-employment.

The pilot used a randomized controlled trial (RCT) design. Eligible SNAP participants were randomly assigned to either the P2P group, which received enhanced services, or a control group, which had access only to existing community resources. Random assignment ensured comparability, and voluntary participation allowed the evaluation to estimate the intent-to-treat (ITT) effects of P2P services. The evaluation's findings provide insight into implementation and outcomes for a population that included a significant share of ABAWDs.

SNAP Participation

Across the three-year follow-up period, the P2P pilot had a limited impact on SNAP participation. While P2P led to a slight, statistically significant increase in participation and benefit amounts in the first year after enrollment, these differences did not persist in Years 2 and 3. In Year 1, 98.5% of the P2P group participated in SNAP, compared to 97.7% of the control group—a small but statistically significant difference. The average number of months on SNAP was also slightly higher for the P2P group (10.1 months vs. 9.8 months). Additionally, P2P participants received

higher average SNAP benefits in Year 1 in dollar amounts and as a share of the maximum benefit. However, by Years 2 and 3, SNAP participation rates declined similarly for both groups (to about 70% by Year 3), with no statistically significant differences. Over the whole three-year period, both groups averaged about 24 months of SNAP receipt.

The pilot did not significantly change the likelihood of exiting SNAP, the number of SNAP spells, or re-entry rates. Subgroup analyses generally showed no long-term differences in SNAP participation, including among those who started or completed employment or training activities. In sum, P2P had little long-term effect on SNAP participation, suggesting that increased engagement in employment services did not lead to substantial SNAP exits.

Employment and Earnings

The Kentucky Paths 2 Promise (P2P) pilot showed mixed results for employment and earnings among participants. The program led to modest, short-term increases in employment rates, but these gains did not translate into significant improvements in earnings over the three-year follow-up period.

Unemployment Insurance (UI) wage records show that participants assigned to the P2P group were more likely to be employed than the control group. Employment impacts were statistically significant in Year 1 (a 4 percentage point increase) and Year 2 (a 5 percentage point increase), but the difference narrowed by Year 3 and was no longer significant. These gains were primarily concentrated among participants who engaged in employment or training activities, particularly those who completed an education or training program.

Despite these increases in employment, the program did not lead to higher earnings. Across all years, there were no statistically significant differences in average earnings between the P2P and control groups, whether measured through UI wage records or survey data. Participants tended to find jobs in lower-wage sectors like retail and food service, which limited the potential for earnings growth. The evaluation suggests that while P2P helped some individuals enter or return to the workforce, broader economic conditions in the region—specifically a lack of higher-wage job opportunities—constrained the program’s ability to increase participant earnings meaningfully.

Food Insecurity and Health Outcomes

The evaluation of the Kentucky Paths 2 Promise (P2P) pilot found no statistically significant impact on food insecurity or other health-related outcomes for participants compared to the control group. Despite increased engagement in employment and training services, the intervention did not consistently improve participants’ ability to access adequate nutrition or improve overall health and well-being.

Food insecurity remained high across both groups at the three-year follow-up point. Approximately 45 percent of participants in the P2P group and 43 percent in the control group reported living in food-insecure households, with no statistically significant difference between

them. Similarly, rates of very low food security—indicating more severe hardship—were identical at 31 percent for both groups. These patterns held across various subgroups, including differences in age, employment barriers, household income, and presence of children, and were consistent regardless of whether participants completed employment or training activities through P2P. The lack of impact persisted even after accounting for the potential influence of the COVID-19 pandemic.

Beyond food insecurity, P2P had no statistically significant effects on other measures of health and well-being. Self-reported health status, depression screening, self-esteem, and self-efficacy scores were all comparable between the P2P and control groups at the 36-month follow-up. For example, about 27 percent of P2P participants reported “very good” or “excellent” health, compared to 23 percent of the control group—a difference that was not statistically significant.

Overall, the P2P pilot did not produce meaningful improvements in food security or health outcomes, highlighting the limitations of employment and training interventions in addressing these broader measures of well-being among SNAP participants in high-poverty areas.

Cost-Effectiveness

The cost-benefit analysis of the Kentucky Paths 2 Promise (P2P) pilot program found that, although participants directly benefited from support services, the program resulted in a net cost for the government, taxpayers, and society overall. Corresponding gains in participant earnings or reductions in public assistance use over the 36-month follow-up period did not offset the higher costs of delivering the P2P intervention.

From the perspective of P2P participants, the program generated a modest net benefit, primarily driven by the value of support services such as transportation and childcare. However, from the perspective of government and taxpayers, the costs of operating the program—including planning, recruitment, service delivery, and subsidized earnings—outweighed the financial benefits, such as increased tax revenue and reduced SNAP or TANF payments. For society, the analysis estimated a benefit-cost ratio close to zero based on Unemployment Insurance wage data and just 0.18 based on 36-month survey data. This indicates that, for every dollar invested, society gained only 18 cents in financial returns.

Sensitivity analyses confirmed these findings, showing that even under alternative assumptions about costs and benefits, P2P did not achieve a positive net benefit for the government or society. While P2P improved service access and provided financial assistance to participants, its higher costs and lack of significant long-term earnings increases meant it was not cost-effective within the evaluation period. These results highlight the challenges of generating positive returns from employment and training interventions in high-poverty regions with limited labor market opportunities.

Summary

The Kentucky Paths 2 Promise (P2P) pilot, a randomized controlled trial to improve employment outcomes for SNAP recipients in eight high-poverty Appalachian counties, produced mixed results. While the program led to modest short-term increases in employment, particularly among those who engaged in training activities, it did not translate into higher earnings or sustained employment gains over the three-year follow-up period. SNAP participation rates declined similarly for both P2P and control groups after the first year, with no lasting differences in exits or re-entry. Additionally, P2P had no statistically significant impact on food security, health status, or broader measures of well-being. The cost-benefit analysis concluded that, despite providing direct benefits through support services like transportation and childcare, the program's higher costs outweighed any financial returns to the government, taxpayers, or society. These findings underscore the limitations of employment and training interventions in economically distressed regions with limited job opportunities.

Conclusion

This literature review underscores the complexity of evaluating the effects of SNAP work requirements for Able-Bodied Adults Without Dependents (ABAWDs). Across a growing body of research, there is broad agreement that work requirements consistently lead to large reductions in SNAP participation among ABAWDs. These reductions are well-documented in administrative and survey-based studies, often resulting in disenrollment without corresponding increases in employment or earnings. Instead, work requirements appear to act as time limits for those unable to meet work thresholds, disproportionately impacting individuals with health complications, a lack of job history, or members of other marginalized groups.

At the same time, the evidence shows that work requirements often exacerbate material hardship. Studies suggest that many affected individuals experience higher rates of food insecurity and may face adverse health outcomes as a result of losing access to SNAP benefits. Despite the policy goal of promoting economic self-sufficiency, the imposition of work requirements frequently leads to increased reliance on emergency food assistance, more significant financial strain, and worsened health conditions, particularly among the most vulnerable subgroups within the ABAWD population.

Findings from evaluations of SNAP E&T interventions, including Kentucky's Paths 2 Promise (P2P) pilot, suggest muted results in areas with limited job availability. While P2P increased participation in employment and training activities and provided critical support services, it failed to improve employment, earnings, food security, or overall well-being. The program's high costs and limited impacts on economic outcomes further highlight the challenges of designing effective interventions in regions with persistent poverty and limited job opportunities. The literature suggests that SNAP work requirements have not achieved their intended goals and raise important questions about their effectiveness in promoting long-term economic mobility for ABAWDs. Similarly, while expansions to SNAP Employment and Training (E&T) programs show promise

in increasing service engagement, further research is needed to understand how these programs can more effectively support sustained employment, higher earnings, and overall economic self-sufficiency.

Overview of Alternatives

Alternative 1 – No Waivers or Discretionary Exemptions

Under this policy alternative, Kentucky would not exercise its existing authority to request waivers from SNAP work requirements for Able-Bodied Adults Without Dependents (ABAWDs). As a result, counties in areas with high unemployment rates (at or above 10%) or designated as labor surplus areas (with unemployment rates at least 20% higher than the national average for 24 consecutive months) would no longer be eligible for waivers from time limits. Implementing this option would require action from either the Kentucky Executive Cabinet, which currently holds the authority to request waivers, or the Kentucky General Assembly, through legislation that removes or otherwise limits that authority.

In addition, Kentucky would opt not to use its 8% discretionary exemptions. These exemptions allow states to exempt a number of individuals from the ABAWD time limit equal to 8% of the non-waived ABAWD caseload in a given fiscal year. Without these exemptions, all ABAWDs in the state would be subject to federal SNAP work requirements unless otherwise exempt.

Under this policy, ABAWDs would be required to meet one of the following conditions to maintain SNAP eligibility beyond three months in 36 months:

- Work at least 80 hours per month in paid employment, volunteer work, or in-kind work;
- Participate in a qualifying work or training program, such as SNAP Employment and Training (E&T), for at least 80 hours per month; or
- Combine work and participation in a work or training program for a total of at least 80 hours per month.

Individuals who do not meet these requirements would be limited to receiving SNAP benefits for three months within any three-year period unless they qualify for another exemption, such as disability, pregnancy, veteran status, homelessness, or caregiving responsibilities.

Alternative 2 – County-Level Waivers Based on High Unemployment

Under this policy alternative, Kentucky would maintain its current practice of requesting county-level waivers from SNAP work requirements for Able-Bodied Adults Without Dependents (ABAWDs) residing in areas with high unemployment. These waivers exempt ABAWDs from the federal three-month time limit on SNAP benefits when they live in areas that meet specific economic criteria established by the U.S. Department of Agriculture (USDA).

Waiver requests would continue to be submitted for counties that meet one or both of the following conditions:

1. The county's unemployment rate exceeds 10%; or
2. The county qualifies as, or is part of, a designated labor-surplus area, with an unemployment rate at least 20% higher than the national average for a period of 24 consecutive months.

Under this policy, the Kentucky Executive Cabinet would retain its role and ongoing practice in submitting waiver requests to the USDA. If approved, ABAWDs living in waived counties would not be subject to the three-month time limit and could continue to receive SNAP benefits without needing to meet additional federal work requirements.

Alternative 3 – 8% Discretionary Exemptions with County-Level Waivers

Under this policy alternative, Kentucky would implement its federally authorized 8% discretionary exemptions for Able-Bodied Adults Without Dependents (ABAWDs), alongside its existing practice of requesting county-level waivers from SNAP work requirements. This approach would allow the state to provide additional exemptions to ABAWDs who are not covered by a county waiver but are at risk of losing SNAP benefits due to the federal three-month time limit.

The number of discretionary exemptions available to the state is equal to 8% of the estimated number of non-waived ABAWDs in a given fiscal year. Each exemption allows an individual ABAWD to receive one additional month of SNAP benefits beyond the three-month time limit. Currently, Kentucky does not use these exemptions due to state statutory restrictions.

Under this policy, Kentucky would revise its existing policies to allow for the use of both discretionary exemptions and county waivers. The state would continue to request county waivers for areas that meet federal criteria, including counties in areas with unemployment rates above 10% or those designated as labor-surplus areas with unemployment rates at least 20% higher than the national average over 24 consecutive months.

By combining discretionary exemptions with county waivers, Kentucky could extend time-limit exemptions to additional ABAWDs who may face challenges meeting work requirements, particularly in counties not covered by waivers. ABAWDs residing in non-waived counties who do not receive a discretionary exemption would remain subject to the three-month time limit unless they qualify for another exemption under federal rules, such as disability, pregnancy, veteran status, homelessness, or caregiving responsibilities.

Alternative 4 – Expanded SNAP Employment & Training (E&T) Services with County-Level Waivers

Under this policy alternative, Kentucky would expand its SNAP Employment & Training (E&T) program by establishing a two-tier structure. The state would scale up the core components of the

Paths 2 Promise (P2P) pilot into an enhanced, intensive E&T track available statewide, while continuing to offer a general, lower-intensity E&T option for other SNAP work registrants. Participation in both tiers would remain voluntary. The enhanced E&T track would be targeted to Able-Bodied Adults Without Dependents (ABAWDs) subject to the federal three-month time limit, who either volunteer or are referred as part of a time-limit mitigation strategy. Kentucky would also continue its current practice of requesting county-level waivers from ABAWD time limits in areas of high unemployment.

This two-tier approach is assumed to be permissible under federal SNAP E&T regulations, which allow states to structure services and target subpopulations as part of their E&T plans (Electronic Code of Federal Regulations, n.d., § 273.7(a)(1)). ABAWDs represent a distinct group under federal statute and regulations, enabling states to tailor services to this subgroup. If federal guidance required the enhanced services to be made available to all work registrants, the program would be adjusted accordingly, with ABAWDs expected to represent a significant share of participants.

Key components of the enhanced E&T track would include comprehensive assessments, individualized career planning, education and occupational training, work-based learning opportunities, job search and placement assistance, coordinated case management, and barrier reduction supports such as transportation and childcare assistance. Participants would also have access to job retention services and on-site support through Employer Resource Networks (ERNs). The program would prioritize ABAWDs for enrollment in the enhanced services, while maintaining a general E&T track accessible to other SNAP work registrants.

Criteria

Effectiveness

Effectiveness, weighted at 40%, refers to the extent to which a policy achieves its stated goals and objectives. This criterion considers how policy alternatives align with the primary stated objectives of SNAP work requirements (increasing labor force participation, boosting earnings) as well as the program's fundamental mission (alleviating food insecurity, reducing poverty, improving health and well-being for low-income households) (Harris, 2021; USDA-FNS). Therefore, measuring effectiveness necessitates evaluating impacts on labor market outcomes and effects – intended or unintended – on food security, poverty levels, health status, and healthcare access. An effective work requirement policy, within the SNAP context, should ideally support or at least not undermine these core program goals.

The assessment draws on findings from the academic literature, including studies that examine the impact of SNAP work requirements and related employment and training (E&T) interventions. Research evaluating the effects of these policies provides insight into their effectiveness in achieving employment and earnings gains, as well as their influence on SNAP participation, food

security, and health outcomes. Particular consideration is given to studies that use administrative data and quasi-experimental methods, which offer stronger evidence on causal impacts.

Each policy alternative is qualitatively rated based on its potential to improve employment and earnings outcomes or to mitigate negative effects such as food insecurity and adverse health impacts.

Ratings will be assigned as follows:

- **3 (Highly Effective):** Clear, significant positive impacts on employment and earnings, and/or highly effective in mitigating negative consequences such as food insecurity and adverse health outcomes.
- **2 (Moderately Effective):** A combination of positive outcomes and mitigation of negative impacts. May include negative outcomes but, overall, demonstrates greater effectiveness compared to alternatives with minimal positive or negative effects.
- **1 (Low-No Effectiveness):** Little or no meaningful positive effects on employment or earnings, with limited ability to mitigate negative consequences such as food insecurity or adverse health outcomes. Some negative effects.
- **0 (Negative Effectiveness):** Minimal or no positive impacts, accompanied by significant negative effects. These may include increased food insecurity, worsened health outcomes, or substantial SNAP disenrollment without a corresponding increase in employment.

Equity

Equity, weighted at 25%, examines the distribution of a policy's benefits, costs, and impacts across different segments of society and has been a demonstrated area of focus for the USDA-FNS (Reamer, 2024). It moves beyond aggregate outcomes to analyze who is affected and how. For SNAP work requirements, evaluating equity involves assessing several key dimensions. This includes examining the impact on vulnerable groups, meaning how requirements affect individuals facing substantial barriers to stable employment such as health conditions, disabilities, caregiving responsibilities, lack of transport or childcare, unstable housing, low education or experience, criminal records, or discrimination, including potential differential impacts based on race, ethnicity, gender, or geography. Operationally, it evaluates whether the policy improves outcomes for vulnerable ABAWDs or if it worsens hardships that limit their economic stability.

Qualitative assessments will be based on how the policies affect low-income populations, individuals with health complications, and minoritized communities within the SNAP ABAWD population. The available literature will be referenced to assess how different policy approaches impact these groups, considering both direct benefits and potential unintended consequences.

Ratings will be assigned as follows:

- **3 (Highly Equitable):** Provides significant benefits, reducing hardship and improving stability for vulnerable populations, particularly through measures that protect the most disadvantaged groups.
- **2 (Moderately Equitable):** Results in moderate benefits or mitigation of negative impacts for vulnerable communities, helping reduce hardship without exacerbating disparities.
- **1 (Low-No Equity Impact):** Shows minimal benefits or only slight reductions in harm for vulnerable populations, offering limited improvements in stability or access to support.
- **0 (Negative Equity Impact):** Disproportionately harms vulnerable populations, worsening instability or disparities, particularly through policies that push individuals into deeper hardship without meaningful support.

Fiscal Impact

Fiscal impact analysis examines the effects of a policy on government budgets, considering both expenditures and revenues. When evaluating SNAP policies from a state perspective, it is crucial to differentiate between benefit costs (the value of food assistance, funded 100% federally) and administrative costs (expenses incurred by state agencies to operate the program, shared approximately 50/50 between state and federal governments) (Geller et al., 2018).. Therefore, the primary direct fiscal impact of SNAP policy changes on state budgets relates to changes in the state's share of administrative costs.

There is limited direct evidence on the state-level fiscal impacts of SNAP work requirements, as most analyses focus on federal expenditures and broader program effects. This analysis adapts methodology from Gray et al. (2023) to estimate the state fiscal impact specifically for Kentucky. The cost model accounts for changes in SNAP benefit dollars flowing into the state, administrative expenses related to new applications and recertifications, shifts in state income tax revenue due to earnings changes, and potential costs from expanding Employment and Training (E&T) programs. The estimates also incorporate inflation adjustments and apply a discount rate to evaluate the net present value (NPV) of policy alternatives over 18 months. Sources and formulas can be identified in the attached appendix.

This criterion is weighted at 10%, reflecting the relatively low direct administrative costs and because SNAP participation and earnings outcomes are already to a large extent accounted for under the effectiveness and equity criteria. However, the associated monetary costs are still reported for transparency.

Fiscal Impact scores will be evaluated on a continuous scale using the following ranges:

- **3 (Minimal Fiscal Cost):** $NPV > -25,000,000$
- **2 (Low Fiscal Cost):** $-50,000,000 < NPV \leq -25,000,000$
- **1 (Moderate Fiscal Cost):** $-75,000,000 < NPV \leq -50,000,000$
- **0 (High Fiscal Cost):** $NPV \leq -75,000,000$

Feasibility

Political feasibility, weighted at 25%, assesses whether a policy alternative is likely to be adopted and sustained within Kentucky's current and future political landscape. This criterion considers support from key actors, including the Governor, Cabinet, and legislative majority, as well as broader stakeholder backing. Policies with historical precedent in Kentucky or similar states may have an advantage, as do those that are administratively manageable and require minimal new resources or funding. Legal and regulatory compatibility is also key—alternatives allowed under existing federal and state law face fewer barriers.

In this analysis, political feasibility is qualitatively assessed and then categorized based on available information about Kentucky's political environment and historical policy decisions related to SNAP work requirements. The evaluation accounts for potential shifts in administration and legislative priorities, as well as practical considerations for implementation. Feasibility scores will be evaluated on a continuous scale using the following categories:

- 3 (High Feasibility): 8–10 "Yes" responses
- 2 (Moderate Feasibility): 5–7 "Yes" responses
- 1 (Low Feasibility): 2–4 "Yes" responses
- 0 (Very Low Feasibility): 0–2 "Yes" responses

Evaluation of Alternatives

Alternative 1 – No Waivers or Discretionary Exemptions

Effectiveness:

Alternative 1 involves the complete elimination of county-level waivers and the non-use of discretionary exemptions, thereby applying SNAP work requirements universally to all non-exempt ABAWDs across Kentucky.

Based on the comprehensive literature review, this approach demonstrates significantly negative effectiveness. Research utilizing robust administrative data consistently shows these requirements fail to produce meaningful improvements in employment rates or earnings. For instance, Gray et al. (2023) found no significant employment increase 18 months post-reinstatement in Virginia and ruled out earnings gains greater than \$28 per month, while Hall (2022) found no causal link between requirements and earnings in Maryland, and Vericker et al. (2023) found earnings decreased in some states following reinstatement. Instead, the most pronounced and consistent outcome is a substantial reduction in program participation; Gray et al. (2023) observed a 53% decline among affected ABAWDs, with similar significant drops found by Hall (2022), Ndumele et al. (2025), Wheaton et al. (2021), and Vericker et al. (2023).

Furthermore, there is strong evidence that imposing work requirements increases food insecurity, leading to reduced household food expenditures (Zhang & Fitzpatrick, 2024), increased reliance

on emergency food assistance (Cuffey et al., 2023), and greater financial strain via increased debt (Dodini et al., 2024). Negative health outcomes are also associated, including increased physically unhealthy days (Feng, 2021) and disproportionate benefit loss among those with chronic conditions (Ndumele et al., 2025).

This alternative functions primarily as a time limit, cutting off vital assistance without fostering economic self-sufficiency.

Final Effectiveness Score: 0 (Negative Effectiveness)

The policy fails to yield positive outcomes while demonstrably causing harm, evidenced by significant reductions in SNAP participation, elevated food insecurity, and deteriorating health conditions.

Equity:

Alternative 1, by applying SNAP work requirements universally without county waivers or discretionary exemptions, disregards significant differences in individual circumstances and local economic conditions, leading to inequitable outcomes across various subgroups of the ABAWD population. The literature reviewed provides clear evidence of these disproportionate impacts. Studies indicate that Black and Hispanic ABAWDs experience significantly steeper declines in SNAP participation compared to White ABAWDs when work requirements are imposed (Brantley et al., 2020). Furthermore, individuals with health limitations, even when not meeting formal disability exemption criteria, face greater barriers and significantly higher risks of losing SNAP coverage; Ndumele et al. (2025) found dramatically higher risks among those with chronic conditions like diabetes (91% higher risk) and older ABAWDs with comorbidities (553% higher risk) compared to healthier individuals.

This policy also disproportionately affects those already facing economic precarity, as the largest disenrollment effects occur among ABAWDs experiencing homelessness or those with no prior earnings (Gray et al., 2023), and the lowest-income ABAWDs face a dramatically higher risk of losing benefits (Ndumele et al., 2025). Significant food insecurity impacts are also concentrated among those working very few hours (Cronin, 2024). Applying requirements statewide also ignores the reality of limited job opportunities in many parts of Kentucky, particularly economically distressed rural areas where the policy primarily leads to benefit loss rather than employment (Harris, 2021; Gray et al., 2023).

By failing to account for these varied circumstances, Alternative 1 imposes hardship most severely on ABAWDs already facing significant structural disadvantages, thereby deepening existing inequities related to race, health, income, and geography.

Final Equity Score: 0 (Negative Equity Impact)

Disproportionately harms vulnerable populations, deepening instability and disparities without meaningful support.

Fiscal Impact:

Under this alternative, Kentucky faces a low-to-moderate fiscal cost, primarily due to increased administrative workload and a significant loss of federal SNAP benefit dollars flowing into the state. The decline in SNAP participation reduces transfers that would otherwise support local economies. While there are modest increases in participant earnings, the additional tax revenue generated for the state is minimal and does little to offset the overall fiscal loss. The Net Present Value (NPV) of the total fiscal change is -\$35.5 million over 18 months.

Final Fiscal Impact Score: 1.58 (Low-to-Moderate Fiscal Cost)

Feasibility:

Implementing Alternative 1, which eliminates county-level waivers and discretionary exemptions, would enforce SNAP time limits statewide for all non-exempt ABAWDs. Politically, this approach aligns with the demonstrated interest of the current Kentucky General Assembly majority, as evidenced by recent legislative efforts like HB 367 in the 2024 session, which sought to restrict the Cabinet's ability to request waivers. Such legislative actions signal a strong preference among many lawmakers for tighter eligibility and full enforcement of federal work requirements. Furthermore, this policy has historical precedent within Kentucky; the Bevin administration pursued a similar no-waiver policy between 2016 and 2019, resulting in widespread benefit loss among ABAWDs before being reversed. From an administrative perspective, this alternative is considered straightforward, as it would create a uniform statewide rule requiring minimal new resources and utilizing existing systems for tracking compliance.

Despite legislative interest and administrative simplicity, this alternative faces significant political opposition. The current Beshear administration supports utilizing waivers to mitigate hardship in distressed areas, representing a direct conflict with the policy's premise. Additionally, there is a lack of broad stakeholder support; advocacy organizations like the Kentucky Center for Economic Policy (the client for this report) consistently oppose stricter work requirements, and previous legislative attempts faced pushback. This division between legislative interest and executive/stakeholder opposition makes adoption under the current administration unlikely and limits the policy's potential for long-term durability, as it could be reversed by future administrations with different priorities.

Final Feasibility Score: 1.8 (Moderate Feasibility)

While aligning with legislative interests and having administrative precedent, eliminating county waivers lacks current executive backing and faces strong stakeholder opposition, resulting in moderate feasibility with limited long-term durability

Alternative 2 – County-Level Waivers Based on High Unemployment

Effectiveness:

Alternative 2 maintains Kentucky's current practice of requesting county-level waivers from SNAP ABAWD time limits in areas with high unemployment. This approach shields ABAWDs in waived counties from the three-month time limit and associated work requirements. The literature consistently shows that imposing these requirements results in significant SNAP participation declines without meaningful improvements in employment or earnings (Gray et al., 2023; Hall, 2022; Wheaton et al., 2021). By securing waivers in areas with limited job opportunities, Alternative 2 effectively prevents this disenrollment and avoids penalizing individuals unable to find sufficient work.

Furthermore, this alternative mitigates the documented negative health consequences associated with work requirements. Evidence indicates that imposing requirements increases food insecurity and material hardship (Zhang & Fitzpatrick, 2024; Cronin, 2024; Cuffey et al., 2023), and is also linked to worse physical health outcomes, such as increased physically unhealthy days (Feng, 2021), and greater need for mental health services (Allen et al., 2023). Waivers under Alternative 2 help prevent these adverse impacts on both food security and broader physical and mental well-being in the counties covered. However, work requirements would still apply in non-waived counties, leaving ABAWDs in those areas potentially exposed to time limits and associated harms if they face individual barriers unrelated to local unemployment rates.

While Alternative 2 doesn't proactively increase employment, it is effective in limiting the negative participation, food security, and health outcomes associated with work requirements where job opportunities are weakest.

Final Effectiveness Score: 2.5 (Moderately Effective to Highly Effective)

Overall, county-level waivers effectively reduce hardship and prevent negative health and participation outcomes in distressed areas but do not significantly improve employment outcomes.

Equity:

Alternative 2 maintains Kentucky's current practice of requesting county-level waivers from SNAP ABAWD time limits in areas with high unemployment, providing crucial protection by reducing the risk of benefit loss for individuals in regions with limited job opportunities. This approach directly addresses equity concerns by mitigating the documented disparate harms that SNAP work requirements impose on vulnerable groups when universally applied.

For instance, waivers prevent the steeper declines in SNAP participation experienced by Black and Hispanic ABAWDs compared to White ABAWDs (Brantley et al., 2020). They also shield individuals with health challenges—who face significantly higher risks of losing coverage under work requirements, such as those with chronic conditions (Ndumele et al., 2025) or conditions not

meeting formal disability criteria (Ku et al., 2019)—from increased hardship and potential worsening of health disparities linked to requirements, like increased physically unhealthy days (Feng, 2021).

Furthermore, by preserving SNAP access in economically distressed areas, waivers support those most likely to be harmed by requirements, including individuals experiencing homelessness, those with limited work history (Gray et al., 2023), and the lowest-income ABAWDs (Ndumele et al., 2025). Waivers also help avoid the greater food insecurity disproportionately experienced by those working minimal hours when requirements are enforced (Cronin, 2024).

However, Alternative 2 leaves equity gaps, as ABAWDs in non-waived counties remain subject to time limits, potentially facing benefit loss due to individual barriers not captured by county-level data, such as specific health challenges, limited education, lack of transportation, or caregiving responsibilities.

Final Equity Score: 2.5 (Moderately to Highly Equitable)

This policy meaningfully protects ABAWDs in high-unemployment counties but does not extend relief to those in non-waived areas who may still face systemic barriers to stable employment.

Fiscal Impact:

This alternative results in a low-to-minimal fiscal cost for Kentucky. By allowing waivers in high-unemployment counties, the state minimizes the number of ABAWDs subject to work requirements, stabilizing SNAP participation and reducing administrative costs compared to full enforcement. While there is some additional tax revenue from increased earnings, the gain is limited. The policy helps retain more federal SNAP dollars within Kentucky's economy, mitigating the fiscal burden. The NPV of the total fiscal change is -\$6 million over 18 months.

Final Fiscal Impact Score: 2.76 (Low-to-Minimal Fiscal Cost)

Feasibility:

Alternative 2 reflects Kentucky's current policy practice under the Beshear administration, which involves requesting county-level waivers from SNAP ABAWD time limits for areas meeting federal high unemployment or labor surplus criteria. This approach benefits from strong support within the executive branch (Governor and Cabinet) and alignment with advocacy organizations like the Kentucky Center for Economic Policy, as well as likely backing from local officials in economically distressed regions benefiting from the waivers. The policy also has historical precedent in Kentucky, representing the state's typical approach outside of the 2016-2019 Bevin administration period. Administratively, continuing this practice is manageable, utilizing existing processes for monitoring economic conditions and submitting requests to USDA-FNS, and it requires no significant new state resources or funding.

Despite its current implementation and support, this alternative faces notable political challenges regarding its long-term sustainability. The legislative majority has expressed skepticism and opposition toward broad waiver use, evidenced by repeated attempts (such as HB 7 in 2022 and HB 367 in 2024) to restrict the Cabinet's authority to request these waivers without legislative approval. While these specific legislative proposals did not fully succeed in restricting authority, they signal ongoing political tension and a potential for future statutory changes that could limit or eliminate the use of county waivers. This legislative opposition means the policy's endurance across different administrations is uncertain, as a future administration aligned with the legislature could easily reverse the practice.

Final Feasibility Score: 2.1 (Moderate Feasibility)

Continuing county-level waivers is feasible under current conditions due to executive support and administrative ease, but ongoing legislative scrutiny and potential policy changes limit its long-term durability.

Alternative 3 – 8% Discretionary Exemptions with County-Level Waivers

Effectiveness:

Alternative 3 combines the ongoing practice of county-level waivers (as in Alternative 2) with the strategic use of federally authorized 8% discretionary exemptions for ABAWDs. This dual approach maintains the protection offered by waivers in high-unemployment counties while adding a targeted tool for non-waived areas. The extensive literature consistently demonstrates that imposing SNAP work requirements leads to significant declines in program participation (Gray et al., 2023; Hall, 2022; Ndumele et al., 2025) and increased hardship, including greater food insecurity (Zhang & Fitzpatrick, 2024; Cronin, 2024) and adverse health outcomes (Feng, 2021; Allen et al., 2023), without yielding meaningful improvements in employment or earnings (Gray et al., 2023; Hall, 2022; Wheaton et al., 2021; Vericker et al., 2023). County-level waivers effectively prevent these negative consequences for ABAWDs residing in regions with limited job availability.

The addition of 8% discretionary exemptions provides an incremental effectiveness benefit by offering temporary relief to a limited number of ABAWDs in non-waived counties. These exemptions allow the state to grant an additional month of SNAP eligibility to individuals at imminent risk of losing benefits due to not meeting the 80-hour work requirement. For this targeted subset (up to 8% of the non-waived caseload annually), the exemptions function as a crucial stopgap, directly mitigating the loss of food assistance and preventing the associated negative impacts on food security and health for those individuals. However, these exemptions are limited in scope and duration; they do not alter the fundamental lack of positive employment or earnings effects associated with the underlying work requirement policy itself. They merely provide short-term protection from the consequences for a small group. Therefore, while Alternative 3 is slightly more effective than county waivers alone due to this added safety net layer, its overall impact on

promoting employment or self-sufficiency remains negligible, consistent with the broader literature.

Final Effectiveness Score: 2.75 (Moderately to Highly Effective)

This policy modestly improves upon county waivers by using exemptions to lessen benefit loss for some ABAWDs in non-waived areas, further mitigating negative outcomes like food insecurity, though the scope is limited and it does not increase employment.

Equity:

Alternative 3 combines county-level waivers with the use of Kentucky's federally authorized 8% discretionary exemptions, offering a dual approach that enhances equity compared to relying solely on waivers. County waivers provide a foundational layer of equity by protecting ABAWDs in high-unemployment areas, mitigating harms such as the steeper participation declines observed among Black and Hispanic individuals when requirements are imposed (Brantley et al., 2020) and shielding those in economically distressed regions where job opportunities are scarce (Gray et al., 2023).

The primary equity advantage of Alternative 3 stems from the addition of discretionary exemptions. These exemptions allow the state to provide targeted, temporary relief (one additional month of benefits per exemption) to a limited number of ABAWDs in non-waived counties who are at risk of losing SNAP due to the time limit. This mechanism enables the state to address inequities faced by individuals whose barriers are not reflected in county-wide unemployment data. Exemptions can be prioritized for those facing significant hurdles, such as individuals with health conditions hindering work but not meeting formal disability criteria (Ku et al., 2019; Ndumele et al., 2025), those experiencing unstable housing (Gray et al., 2023), individuals encountering systemic barriers linked to race or ethnicity (Brantley et al., 2020), or those struggling with volatile low-wage employment leaving them short of the required hours while being financially vulnerable (Cronin, 2024). By providing this targeted safety net, discretionary exemptions help prevent benefit loss among some of the most vulnerable ABAWDs who reside outside of waived areas, thereby reducing the disproportionate impacts of work requirements. However, the equity gains are constrained by the 8% cap on the number of exemptions available annually, meaning many individuals facing significant barriers in non-waived counties may still lose benefits. Despite this limitation, the ability to target relief makes this a highly equitable option compared to alternatives lacking this tool.

Final Equity Score: 3 (Highly Equitable)

Discretionary waivers provide a critical safety net for ABAWDs at the highest risk of losing benefits. While limited in scope, their ability to prioritize those with the greatest need makes this a highly equitable option.

Fiscal Impact:

This alternative produces a low-to-minimal fiscal cost. The addition of discretionary exemptions allows Kentucky to target relief to more disadvantaged ABAWDs, reducing the number subject to work requirements and helping maintain SNAP participation. This preserves more federal benefit dollars in the state while limiting administrative churn. Minimal gains in tax revenue from higher earnings do little to affect the overall fiscal picture. The NPV of the total fiscal change is -\$5.96 million over 18 months.

Final Fiscal Impact Score: 2.76 (Low-to-Minimal Fiscal Cost)

Feasibility:

Alternative 3 proposes combining county-level waivers with the use of Kentucky's federally allocated 8% discretionary exemptions for ABAWDs. The most significant feasibility challenge for this alternative is a current state statutory barrier. Kentucky Revised Statute § 205.178 explicitly prohibits the state from utilizing these specific federal discretionary exemptions (allowed under 7 U.S.C. § 2015(o)(6)). Therefore, implementing Alternative 3 is not possible under current state law and would first require the Kentucky General Assembly to amend KRS § 205.178.

Passing such legislation faces substantial political hurdles. While utilizing exemptions aligns with the Beshear administration's general goal of reducing food insecurity and would likely garner support from advocacy groups, it would almost certainly face strong opposition from the legislative majority. Given the legislature's recent efforts to curtail even the existing county-level waiver authority (e.g., HB 7, HB 367), expanding exemptions would likely be viewed as further undermining federal work requirements. Although the report notes Kentucky has used these exemptions historically prior to statutory changes, there is limited precedent in comparable states for maximizing their use. Administratively, while tracking exemptions adds complexity compared to waivers alone, it is considered manageable within existing systems and requires minimal new state resources. However, the primary obstacle remains the need for legislative change in a resistant political climate.

Final Feasibility Score: 1.8 (Low-Moderate Feasibility)

Requires legislative action to overcome a state statutory prohibition, facing likely legislative opposition despite potential executive/stakeholder support and administrative simplicity.

Alternative 4 – Expanded SNAP Employment & Training (E&T) Services with County-Level Waivers

Effectiveness:

Alternative 4 proposes pairing county-level waivers with a significant expansion of SNAP Employment & Training (E&T) services, modeled statewide after Kentucky's Paths 2 Promise (P2P) pilot. The inclusion of county-level waivers provides a baseline level of effectiveness,

similar to Alternative 2, by ensuring ABAWDs in high-unemployment areas are not subject to the three-month time limit. This component prevents the well-documented negative consequences of work requirements in regions with scarce job opportunities, namely significant drops in SNAP participation, increased food insecurity, and adverse health outcomes (Gray et al., 2023; Hall, 2022; Zhang & Fitzpatrick, 2024; Feng, 2021).

The core of Alternative 4, however, lies in the expanded E&T services offering comprehensive assessments, training, and support. The effectiveness of this component can be assessed by examining the results of the P2P pilot, which operated in eight high-poverty Kentucky counties. The P2P evaluation (Rowe et al., 2022) found that the enhanced services led to modest, short-term increases in employment rates for participants (a 4-5 percentage point increase in the first two years), particularly for those who completed training. However, these employment gains were not sustained over the full three-year follow-up period and, critically, did not translate into statistically significant improvements in overall earnings, as participants often found work in low-wage sectors.

Furthermore, the P2P pilot demonstrated little long-term effect on SNAP participation rates or benefit levels and had no statistically significant impact on reducing food insecurity or improving other measures of health and well-being among participants. While expanding such services statewide might yield somewhat better outcomes in areas with stronger labor markets than the original pilot region, this remains uncertain. Therefore, while the E&T expansion offers valuable support and a potential pathway to short-term employment, the evidence from P2P suggests it is unlikely to generate large or sustained improvements in earnings, reduce SNAP dependency, or significantly improve health outcomes for most ABAWDs.

Final Effectiveness Score: 2.75 (Moderately to Highly Effective)

Combining protective county waivers with expanded E&T offers some workforce support, but P2P results show limited sustained impact on earnings or food security.

Equity:

Alternative 4 combines county-level waivers with an expanded SNAP E&T program modeled on the Paths 2 Promise pilot, presenting a layered approach to equity. The continuation of county waivers provides a baseline of protection, mitigating the disproportionate harms of work requirements in high-unemployment areas, particularly for racial and ethnic minorities and those facing geographic, financial or health related economic disadvantage (Brantley et al., 2020; Gray et al., 2023; Ndumele et al., 2025). This component ensures continued access to essential benefits in regions where opportunities are most scarce.

The expanded E&T services aim to further enhance equity by offering intensive, individualized support—including career planning, training, and substantial barrier reduction assistance like transportation and childcare stipends—theoretically providing greater resources for ABAWDs

facing systemic barriers. This includes individuals in non-waived counties who are subject to time limits but may face challenges related to limited education, unstable housing, health issues, or caregiving responsibilities. By providing these supports, the E&T component intends to create more equitable opportunities for participants to meet requirements or find stable employment.

However, insights from the P2P pilot evaluation suggest practical limitations to the equity achieved through this model alone. While the P2P program successfully increased participation in services compared to controls across diverse subgroups, engagement and completion within the program often correlated with baseline characteristics (for example, those with fewer initial barriers were more likely to complete activities). Furthermore, the P2P pilot did not result in significant improvements in key outcomes like food security or overall well-being, and critically, the evaluation found no significant differences in the impacts on these outcomes, nor on earnings, across subgroups defined by income, education, or other barriers. This suggests that, while a marginal improvement compared to county-level waivers, even enhanced E&T services struggle to translate into equitable outcome improvements for the most vulnerable participants, likely due to deep-seated economic challenges in the distressed pilot region. These results may, however, be more impactful in less economically challenged parts of the state with the tradeoff being that poorer ABAWDs benefit less.

Final Equity Score: 2.75 (Moderately to Highly Equitable)

This alternative provides meaningful benefits and support, particularly through enhanced E&T services aimed at reducing barriers for ABAWDs. However, P2P evaluation data shows participation varied by baseline characteristics, and the enhanced services did not yield equitable improvements in key outcomes like earnings or food security, likely limited by external factors.

Fiscal Impact:

This alternative results in the highest fiscal cost for Kentucky. Expanding SNAP E&T services requires a significant state investment in program delivery and administrative capacity, driving up costs. While these services aim to increase employment, the resulting earnings gains provide minimal additional state tax revenue in the near term. Despite maintaining SNAP participation, the large expenditures associated with E&T expansion contribute to a substantial fiscal burden. The NPV of the total fiscal change is -\$127.73 million over 18 months.

Final Fiscal Impact Score: 0 (High Fiscal Cost)

Feasibility:

Alternative 4 proposes combining county-level waivers with a statewide expansion of intensive SNAP E&T services modeled after the federally funded Paths 2 Promise (P2P) pilot. While expanding voluntary E&T aligns conceptually with the goals of the current administration and advocacy organizations, and the P2P pilot demonstrated that delivering comprehensive services is

possible, scaling such a model statewide faces exceptionally high feasibility barriers according to details in both reports.

The most significant obstacle is funding. The P2P pilot itself was sustained almost entirely by a nearly \$20 million federal grant, with \$13 million spent over its duration; it was found not to be cost-effective from a government or societal perspective within the 36-month evaluation period due to high operating costs (particularly for support services and work-based learning) not being offset by participant earnings gains. Statewide expansion would require a substantial new, ongoing funding commitment for program delivery and administration, which the policy report notes has not been prioritized by the Kentucky legislature.

Second, administrative capacity and complexity pose major challenges. The P2P Final Report details significant hurdles encountered even within the 8-county pilot, including developing coordination between partner agencies (DCBS, EKCEP, KCTCS, CAAs) with differing cultures, implementing a shared data system (Salesforce), ensuring consistent policy application, and managing staffing and training needs. This policy report concurs that Kentucky's current E&T infrastructure is insufficient for a statewide expansion without major investment and capacity building. The P2P report's discussion on sustainability underscores the need for strong state oversight, robust partnerships, dedicated systems, and reliable funding – elements not currently in place for a statewide P2P replication.

Finally, precedent is limited. While P2P provides a Kentucky-specific pilot example, it was temporary and federally funded in only eight counties. There is little precedent in Kentucky or comparable states for a state-funded E&T expansion of this scale and intensity. Given the high costs, significant administrative build-out required, and lack of clear legislative funding commitment, this alternative ranks low in feasibility for near-term implementation.

Final Feasibility Score: 0.9 (Low Feasibility)

Significant financial and administrative hurdles, lack of dedicated funding or legislative backing, and limited precedent make statewide expansion unlikely despite potential support for the concept

Unweighted Outcome Matrix

| Criteria: | No ABAWDs waived from SNAP work requirements | Request for County-Level Waivers Based on High Unemployment | Add 8% Discretionary Exemptions with County-Level Waivers | Expand SNAP E&T Services for ABAWDs with County-Level Waivers |
|------------------------------------|--|---|---|--|
| Effectiveness | 0; Increases food insecurity, no employment or earnings gains. | 2.5; Reduces food insecurity but no job or earnings increase. | 2.75; Keeps more ABAWDs on SNAP, minor added benefit. | 2.75; Workforce support helps some, but impact is severely limited. |
| Equity | 0; Disproportionately harms the most disadvantaged, worsening racial and economic disparities. | 2.5; Protects ABAWDs in high-unemployment areas but leaves out some subgroups in non-waived counties. | 3; Can be targeted toward the most disadvantaged ABAWDs, improving equity. | 2.75; Provides job support, but lower-income and less educated participants benefit less |
| State Cost Burden | 1.45; Low-to-moderate fiscal cost | 2.76; Low-to-minimal fiscal cost | 2.76; Low-to-minimal fiscal cost | 0; High fiscal cost |
| Admin/Political Feasibility | 1.8; GOP legislature supports, but Beshear opposes. Easy to implement but unlikely under current administration. | 2.4; Strong executive support, broad stakeholder backing. Legislative opposition and administrative change may threaten long-term durability. | 1.8; Easy to administer, but more challenging to implement. Governor likely supportive; legislature opposes expanded exemptions | 0.9; Governor and advocates supportive. Legislative funding unlikely. Major admin capacity limits statewide expansion. |
| Total | 3.25 | 10.16 | 10.32 | 6.4 |

Weighted Outcome Matrix

| Criteria: | No ABAWDs waived from SNAP work requirements | Request for County-Level Waivers Based on High Unemployment | Add 8% Discretionary Exemptions with County-Level Waivers | Expand SNAP E&T Services for ABAWDs with County-Level Waivers |
|--|--|---|--|--|
| Effectiveness (40%) | 0; Increases food insecurity, no employment or earnings gains. | 2.5; Reduces food insecurity but no job or earnings increase. | 2.75; Keeps more ABAWDs on SNAP, minor added benefit. | 2.75; Workforce support helps some, but impact is severely limited. |
| Equity (25%) | 0; Disproportionately harms the most disadvantaged, worsening racial and economic disparities. | 2.5; Protects ABAWDs in high-unemployment areas but leaves out some subgroups in non-waived counties. | 3; Can be targeted toward the most disadvantaged ABAWDs, significantly improving equity. | 2.75; Provides job support, but lower-income and less educated participants benefit less |
| Cost (10%) | 1.45; Low-to-moderate fiscal cost | 2.76; Low-to-minimal fiscal cost | 2.76; Low-to-minimal fiscal cost | 0; High fiscal cost |
| Admin/Political Feasibility (25%) | 1.8; GOP legislature supports, but Beshear opposes. Easy to implement but unlikely under current administration. | 2.4; Strong executive support, broad stakeholder backing. Legislative opposition and administrative change may threaten long-term durability. | 1.8; Easy to administer, but more challenging to implement. Governor likely supportive; legislature opposes expanded exemptions. | 0.9; Governor and advocates supportive. Legislative funding unlikely. Major admin capacity limits statewide expansion. |
| Total | 0.6 | 2.5 | 2.6 | 2 |

Recommendation and Implementation

Kentucky should adopt a policy that combines the continuation of county-level waivers with the strategic use of its federally authorized 8% discretionary exemptions for Able-Bodied Adults Without Dependents (ABAWDs). This approach balances the need to maintain access to nutrition assistance for those most affected by SNAP work requirements with the state's fiscal and administrative realities. By layering discretionary exemptions onto the existing waiver process, Kentucky can provide targeted, temporary relief to individuals in non-waived counties who are at immediate risk of losing benefits because they cannot meet the 80-hour monthly work requirement.

To implement this policy, legislative action is required. Kentucky Revised Statutes § 205.178 prohibits the state from seeking waivers of federal SNAP work requirements unless failure to do so would result in a loss of federal funding for SNAP or other assistance programs. This language prevents Kentucky from utilizing the 8% discretionary exemptions allowed under 7 U.S.C. § 2015(o)(6), which do not require a finding of economic distress at the county level and are distinct from broader county waivers. Amending § 205.178 to explicitly authorize the Cabinet for Health and Family Services (CHFS), through the Department for Community-Based Services (DCBS), to exercise these discretionary exemptions is essential. Kentucky cannot implement a dual strategy without this statutory revision that includes county-level waivers and individual exemptions.

Once the legislative barrier is addressed, CHFS and DCBS should establish a straightforward policy for using discretionary exemptions. These exemptions should function as a stopgap measure for ABAWDs living in non-waived counties who cannot meet the work requirement despite their efforts. Exemptions should be prioritized for those at imminent risk of benefit loss who demonstrate that they cannot secure sufficient hours of work, training, or qualifying activities to comply with the requirement.

The exemption allocation process should be simple and accessible. DCBS caseworkers should be trained to identify individuals who need temporary relief from time limits, emphasizing minimizing administrative burden for staff and participants. A basic application or attestation process can be used to document need and ensure fair distribution within the 8% cap. To maintain oversight and compliance, DCBS may need to implement a system to track exemption usage and monitor outcomes, including SNAP participation and recertification trends in non-waived counties.

Public communication will also be important. SNAP participants and advocacy groups should be informed that discretionary exemptions are available as temporary relief in specific cases. DCBS should provide clear guidance on how exemptions work, who might be eligible, and how to apply through its existing communication channels.

Finally, Kentucky should monitor the implementation of this policy and evaluate its effectiveness in mitigating unnecessary benefit loss in non-waived counties. Data collection and analysis will

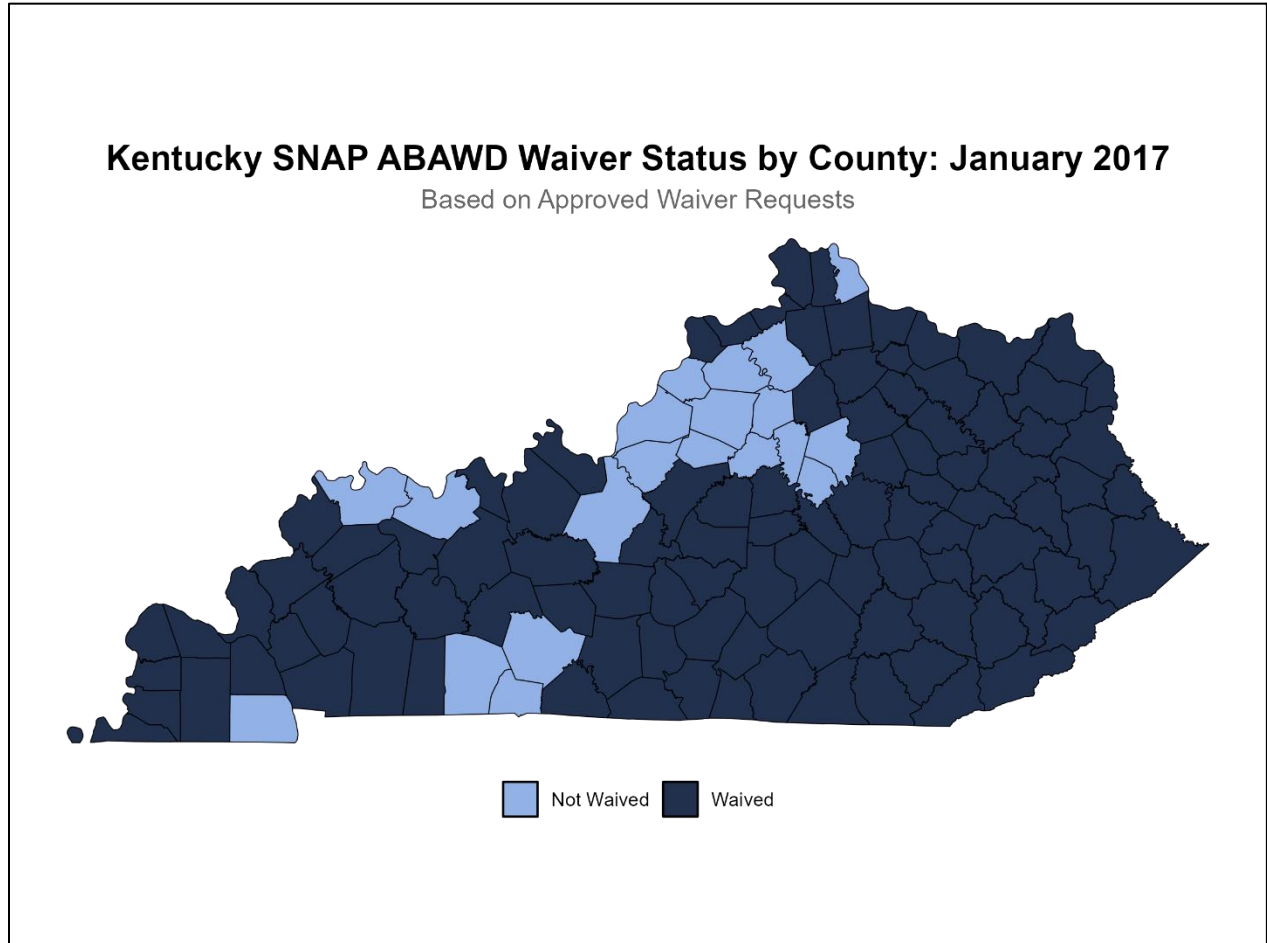
help the state adjust exemption policies over time and ensure they are used effectively as a stopgap measure, providing targeted relief while maintaining compliance with federal regulations.

By adopting this dual approach, Kentucky can offer a practical solution that addresses the most immediate challenges faced by ABAWDs under SNAP work requirements while remaining in compliance with federal law.

Appendix

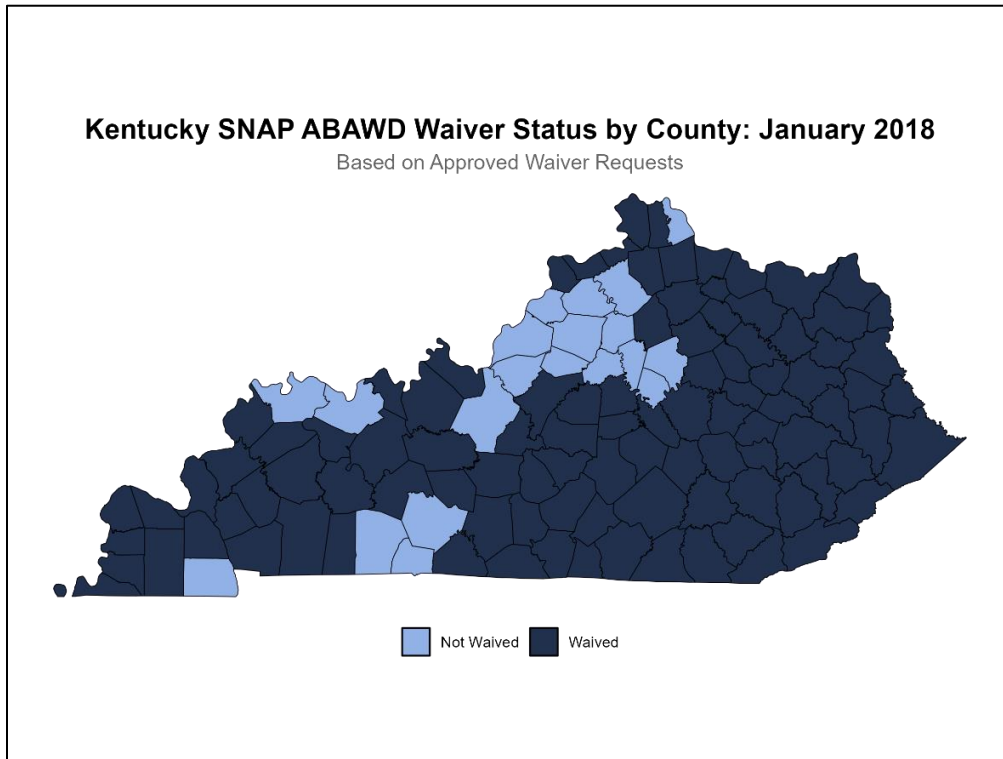
Time-Series of Kentucky Counties by Waiver Status (2017-2024)

Figure 2



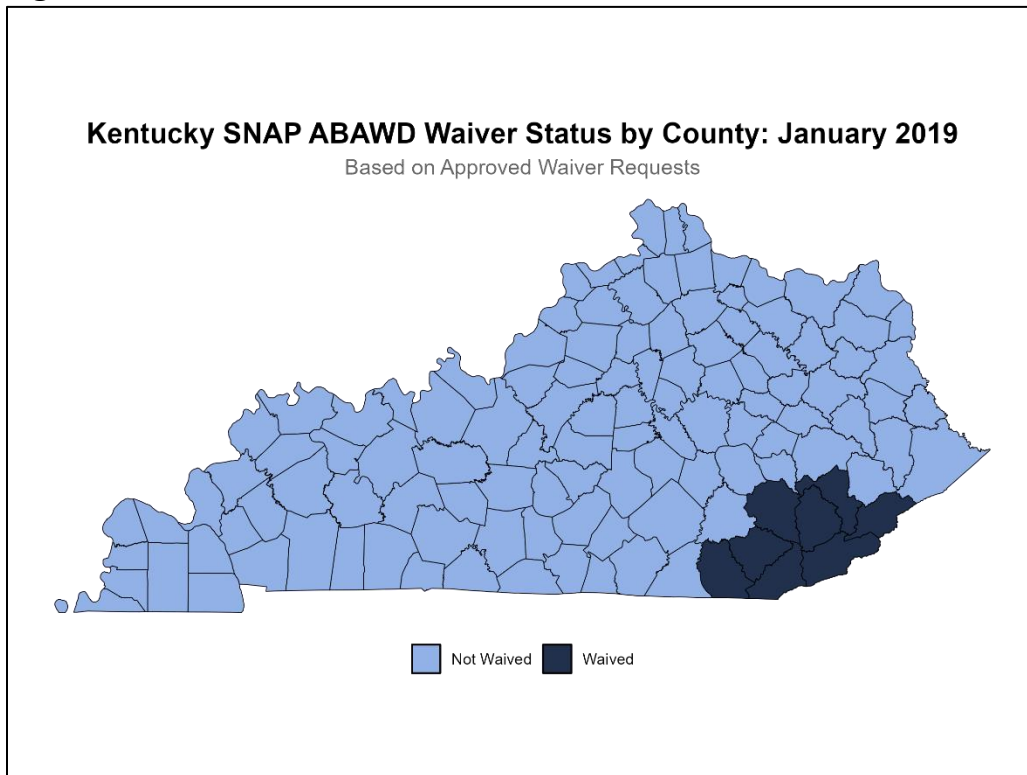
Source: USDA Food and Nutrition Service; Author's Calculations

Figure 3



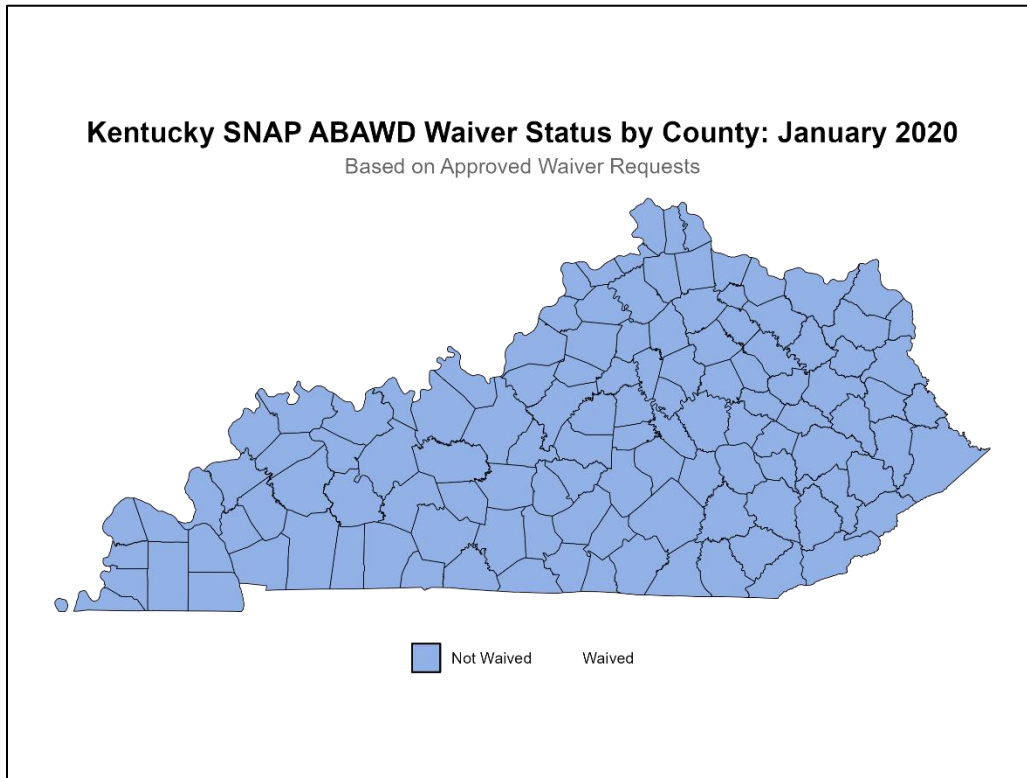
Source: USDA Food and Nutrition Service; Author's Calculations

Figure 4



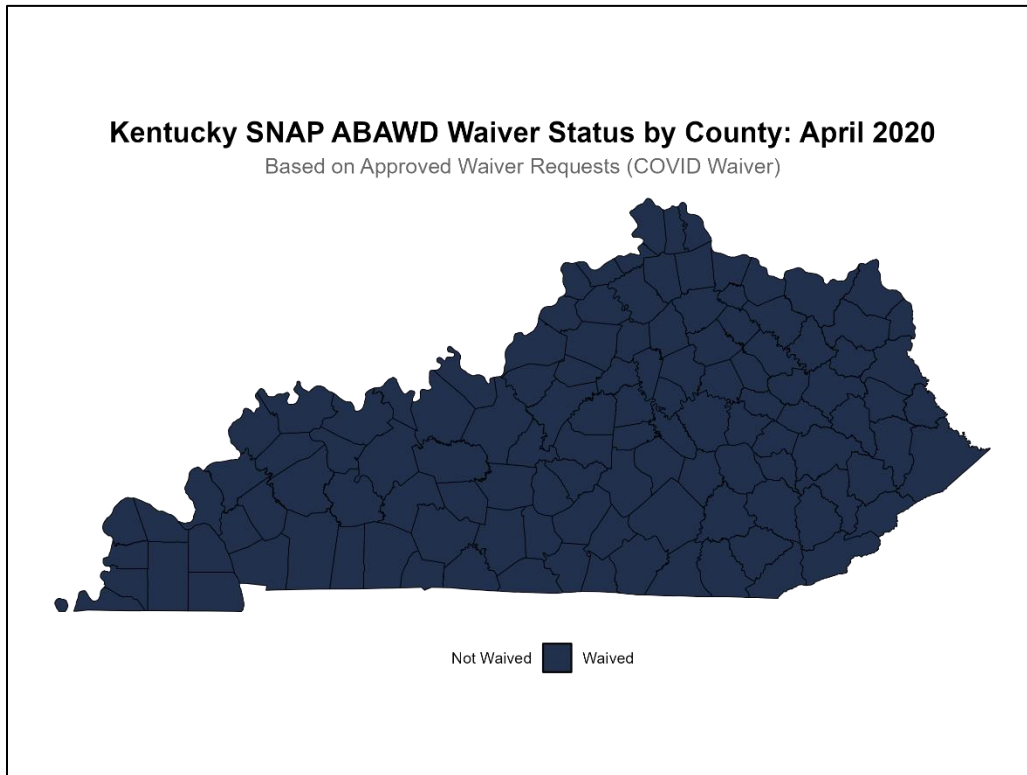
Source: USDA Food and Nutrition Service; Author's Calculations

Figure 5



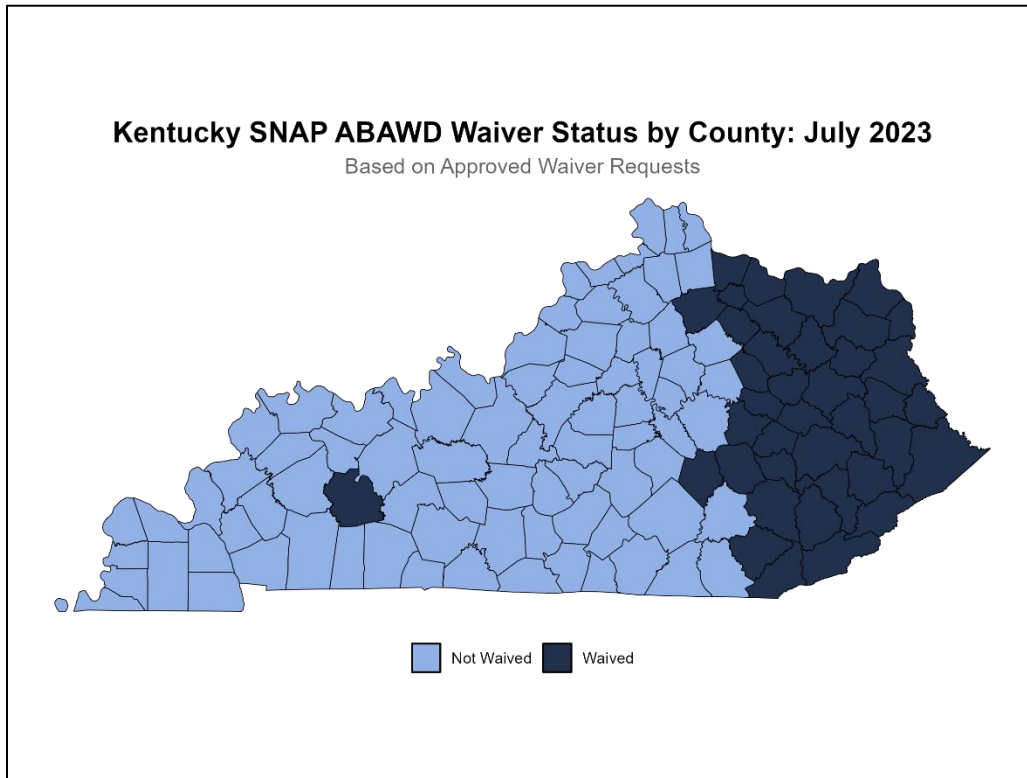
Source: USDA Food and Nutrition Service; Author's Calculations

Figure 6



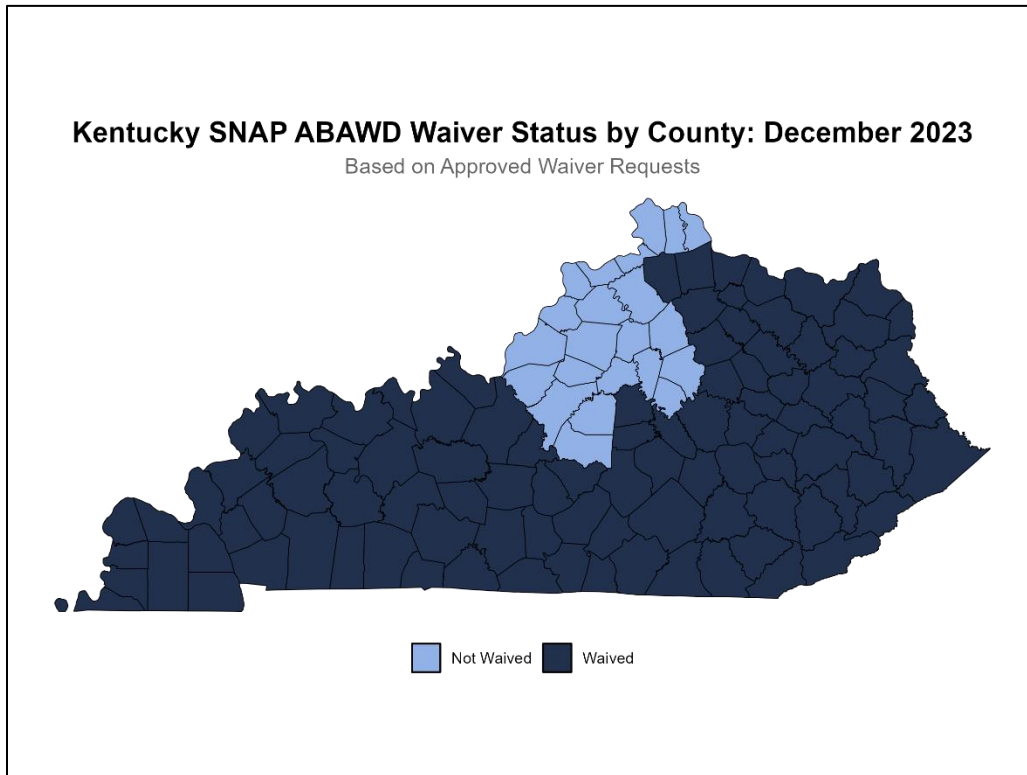
Source: USDA Food and Nutrition Service; Author's Calculations

Figure 7



Source: USDA Food and Nutrition Service; Author's Calculations

Figure 8



Source: USDA Food and Nutrition Service; Author's Calculations

STATA/R Code for Data Visualizations

For access to STATA/R code used to create data visualizations go to <https://bit.ly/DylanAPPCode>

Fiscal Impact Calculator and Scoring

For access to Fiscal Impact Calculator go to <https://bit.ly/DylanAPPCosts>

| Label | Value/Formula | Notes |
|-----------------------------------|---|---|
| SNAP Benefit per Month | 192 | Source: (CBPP; USDA) |
| Duration in Months | 18 | Source: (Gray et al., 2023) Policy assumption |
| SNAP Participation Change (%) | -23.4 | Source: (Gray et al., 2023) |
| New Certification Cost per Case | $672.27 \times (163.2/134.8)$ = \$813.90 | Source: (Gray et al., 2023) Note: Inflated using BLS State and Local Government Worker cost index of 134.8 for March 2018 and 163.2 for December 2023 |
| Recertification Cost per Case | $153.73 \times (163.2/134.8)$ = \$186.11 | Source: (Gray et al., 2023) Note: Inflated using BLS State and Local Government Worker cost index of 134.8 for March 2018 and 163.2 for December 2023 |
| New Applications Change per ABAWD | 0.114 | Source: (Gray et al., 2023) |
| Recertifications Change per ABAWD | -0.215 | Source: (Gray et al., 2023) |
| Expanded E&T Cost Per Month | $180 \times (163.2 / 128.5)$ = \$228.61 | Source: (Rowe et al., 2023) Note: Average total spending per individual assigned to receive treatment (\$6532.57) divided by the total duration of treatment (36 months). Results are likely sensitive to specification but approximate. Inflated using BLS State and Local Government Worker cost index of 128.5 for March 2016 and 163.2 for December 2023 |
| Earnings Change per Month | $66.84 \times (162.1 / 132.5)$ = \$81.79 | Source: (Gray et al., 2023) Note: Inflated using BLS All Workers cost index of 132.5 for March 2018 and 162.1 for December 2023. Strongest |

| | | |
|--|---|---|
| | | estimate of earning effect with likely effect being zero. |
| KY Tax Rate % | 4 | Source: (Kentucky Dept. of Revenue) |
| Annual Inflation Rate for SNAP Benefits (%) | 3.6 | Source: (SNAP FY 2024 COLA increase) |
| Annual Inflation Rate for Admin Costs (%) | 4.7 | Source: (BLS Employment Cost Index for State and Local Government Workers 2024) |
| Annual Wage Growth (%) | 3.4 | Source: (BLS FY2024 Kentucky Wage Growth) |
| Discount Rate for NPV (%) | 7 | Source: (OMB Circular A-94, Section 8) |
| Change in E&T Costs | $(\text{Expanded E\&T Cost per Month} \times \text{Duration}) \times (1 + \text{Annual Inflation Rate for SNAP Benefits}/100)^{(\text{Duration}/12)} \times 0.5$ | Represents total change over 18 months per affected ABAWD, adjusting for inflation in administrative costs. |
| Change in SNAP Benefit Dollars to KY | $\text{SNAP Benefit per Month} \times \text{Duration} \times (\text{SNAP Participation Change \%} / 100) \times ((1 + \text{Annual Inflation Rate for SNAP Benefits}/100)^{(\text{Duration}/12)})$ | Represents total change over 18 months per affected ABAWD, adjusting for inflation in SNAP benefit amounts. |
| Change in Administrative Costs | $((\text{New Certification Cost per Case} \times \text{New Applications Change per ABAWD}) + (\text{Recertification Cost per Case} \times \text{Recertifications Change per ABAWD})) \times (1 + \text{Annual Inflation Rate for Admin Costs}/100)^{(\text{Duration}/12)} \times 0.5$ | Represents total change over 18 months per affected ABAWD, adjusting for inflation in administrative costs. |
| Change in Tax Revenue | $(\text{KY Tax Rate \%} / 100) \times \text{Earnings Change per Month} \times ((1 + \text{Annual Wage Growth}/100)^{(\text{Duration}/12)} - 1) / ((1 + \text{Annual Wage Growth}/100)^{(1/12)} - 1)$ | Represents total change over 18 months per affected ABAWD, adjusting for wage growth. |
| Total Fiscal Change for Kentucky (Without NPV) | <p>Alternatives 1-3: Change in SNAP Benefit Dollars to KY + Change in Administrative Costs + Change in Tax Revenue</p> <p>Alternative 4: Change in SNAP Benefit Dollars to KY - Change in E&T Costs +</p> | Simple sum of the 18-month total changes per ABAWD. |

| | | |
|--|---|--|
| | Change in Administrative Costs + Change in Tax Revenue | |
| NPV of Total Fiscal Change per ABAWD 18 Months | $((\text{Change in SNAP Benefit Dollars to KY} + \text{Change in Administrative Costs} + \text{Change in Tax Revenue}) * (2/3)) / (1 + \text{Discount Rate}(\%)/100)^1 + ((\text{Change in SNAP Benefit Dollars to KY} + \text{Change in Administrative Costs} + \text{Change in Tax Revenue}) * (1/3)) / (1 + \text{Discount Rate}(\%)/100)^{1.5}$ | Calculates Present Value of core changes using split discount method (2/3rds at Year 1, 1/3rd at Year 1.5). |
| NPV of Added E&T Cost per ABAWD 18 Months | $(-1) * ((\text{Change in E\&T Costs} * (2/3)) / (1 + \text{Discount Rate}(\%)/100)^1 + (\text{Change in E\&T Costs} * (1/3)) / (1 + \text{Discount Rate}(\%)/100)^{1.5})$ | Calculates Present Value of E&T costs using split discount method. Result is negative cost. |
| Number of ABAWDs Receiving Expanded E&T | Alternatives 1-3: 0 Alternative 4: 58,283 | Source: (KHFS Internal Data) Note: Average of ABAWDs in Kentucky from January 2024 to October 2024 |
| Number of Additional ABAWDs Subject to Work Requirements | Alternative 1: 50257 Alternative 2: 8495 Alternative 3: 8439 Alternative 4: 0 | Source: (KHFS Internal Data) Note: Average of waived vs. non-waived counties on number of ABAWDs from January 2024 to October 2024. Alternative 3 total calculated using 8% of non-waived ABAWDs converted to annual case exemptions. |
| Total Fiscal Change for KY (Scaled by ABAWDs, Without NPV) | Total Fiscal Change for Kentucky (Without NPV) × Number of Additional ABAWDs Subject to Work Requirements | Scales the non-discounted per-ABAWD impact by the relevant population. |
| NPV of Total Fiscal Change (Scaled by ABAWDs) | (NPV of Total Fiscal Change per ABAWD 18 Months × Number of Additional ABAWDs Subject to Work Requirements) + (NPV of Added E&T Cost per ABAWD 18 Months × Number of ABAWDs Receiving Expanded E&T) | Scales the per-ABAWD Present Values (using split discount) by relevant populations. Combines core impact and E&T impact correctly for all alternatives. |

NPV of Total Fiscal Change (Scaled by ABAWDs)

Alternative 1: -\$35,495,427

$$\text{Score} = 1 + ((-35,495,427 - (-50,000,000)) / (-25,000,000 - (-50,000,000))) * (2 - 1) = \mathbf{1.58}$$

Alternative 2: -\$5,999,834

$$\text{Score} = 2 + ((-5,999,834 - (-25,000,000)) / (0 - (-25,000,000))) * (3 - 2) = \mathbf{2.76}$$

Alternative 3: -\$5,960,282

$$\text{Score} = 2 + ((-5,960,282 - (-25,000,000)) / (0 - (-25,000,000))) * (3 - 2) = \mathbf{2.76}$$

Alternative 4: -\$124,733,42

Score = **0**

Alternative 1: Political Feasibility

| Criteria | Yes/No | Simplified Explanation |
|--|--------|--|
| 1. Likely to be adopted by current state government? | No | The Governor opposes ending waivers. Several failures in committee. |
| 2. Likely to endure across administrations? | No | Democrats likely to reverse under future administrations unless restricted by statute |
| 3. Supported by Governor/Cabinet? | No | Beshear’s administration supports keeping waivers. |
| 4. Supported by legislative majority? | Yes | GOP legislature favors tighter SNAP rules. |
| 5. Broad stakeholder support? | No | Advocacy groups and many local officials oppose it. Multiple legislative failures indicate a lack of support among constituents. |
| 6. Precedent in Kentucky’s history? | Yes | Enforced under Gov. Bevin (2016-2019). |
| 7. Precedent in similar states? | Yes | Some conservative states have similar policies. |
| 8. Administratively manageable? | Yes | Easier to administer—uniform statewide policy. |

| | | |
|--|-----|---|
| 9. Requires minimal new resources/funding? | Yes | Slightly higher administrative costs; fewer people on SNAP. |
| 10. No federal legal/regulatory barriers? | Yes | States are not required to request waivers. |

Total Yes's: 6

Feasibility Score: $(6 / 10) \times 3.0 = 1.8$ (Moderate Feasibility)

Alternative 2: Political Feasibility

| Criteria | Yes/No | Simplified Explanation |
|--|--------|---|
| 1. Likely to be adopted by current state government? | Yes | Already current policy under Beshear. |
| 2. Likely to endure across administrations? | No | Republicans could reverse policy. |
| 3. Supported by Governor/Cabinet? | Yes | Beshear and Cabinet support waivers. |
| 4. Supported by legislative majority? | No | GOP lawmakers favor restrictions. |
| 5. Broad stakeholder support? | Yes | Advocates and local officials support waivers. |
| 6. Precedent in Kentucky's history? | Yes | Long history of using waivers pre-2016 and post-2020. |
| 7. Precedent in similar states? | Yes | Many states, including conservative states, use targeted waivers for high-unemployment areas. |
| 8. Administratively manageable? | Yes | Already being implemented; easy to manage. |
| 9. Requires minimal new resources/funding? | Yes | No new funding; uses existing SNAP processes. |
| 10. No federal legal/regulatory barriers? | Yes | Legal under federal and state law if criteria are met. |

Total Yes's: 8

Feasibility Score: $(8 / 10) \times 3.0 = 2.4$ (High Feasibility)

Alternative 3: Political Feasibility

| Criteria | Yes/No | Simplified Explanation |
|--|--------|--|
| 1. Likely to be adopted by current state government? | No | No clear plans to push for adopting it now. |
| 2. Likely to endure across administrations? | No | Republican governors could likely refuse to use discretionary exemptions |
| 3. Supported by Governor/Cabinet? | Yes | Would align with Beshear's priorities on SNAP |
| 4. Supported by legislative majority? | No | Legislature would likely oppose; seen as bypassing rules. |
| 5. Broad stakeholder support? | Yes | Similar support as for county-waivers |
| 6. Precedent in Kentucky's history? | Yes | Kentucky has previously used these discretionary exemptions prior to HB 7 |
| 7. Precedent in similar states? | No | Few comparable states use their full discretionary exemptions. |
| 8. Administratively manageable? | Yes | Easy to apply exemptions in existing system. Can prioritize those at risk of losing eligibility. |
| 9. Requires minimal new resources/funding? | Yes | No major extra admin cost—federally funded benefits. |
| 10. No federal legal/regulatory barriers? | Yes | Allowed under federal SNAP rules. |

Total Yes's: 6

Feasibility Score: $(6 / 10) \times 3.0 = 1.8$ (Low-Moderate Feasibility)

Alternative 4: Political Feasibility

| Criteria | Yes/No | Simplified Explanation |
|--|--------|---------------------------------------|
| 1. Likely to be adopted by current state government? | No | No current plans or funding in place. |

| | | |
|---|-----|---|
| 2. Likely to endure across administrations? | No | Could be cut by future administrations. |
| 3. Supported by Governor/Cabinet? | Yes | Beshear supports expanding voluntary E&T services generally. |
| 4. Supported by legislative majority? | No | Legislature not interested in funding expansion. |
| 5. Broad stakeholder support? | Yes | Supported by advocates and workforce groups. |
| 6. Precedent in Kentucky's history? | No | P2P pilot program ran in 8 counties (2016–2019); however this was entirely federally funded |
| 7. Precedent in similar states? | No | Few peer states have done large-scale E&T expansion. |
| 8. Administratively manageable? | No | Current systems lack capacity; major build-out needed. |
| 9. Requires minimal new resources/funding? | No | Would require major new investment and staff. |
| 10. No federal legal/regulatory barriers? | Yes | Allowed under federal rules; voluntary E&T is encouraged. |

Total Yes's: 3

Feasibility Score: $(3 / 10) \times 3.0 = 0.9$ (Low Feasibility)

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