

NBER WORKING PAPER SERIES

WORK REQUIREMENTS WITH NO TEETH STILL BITE:
DISENROLLMENT AND LABOR SUPPLY EFFECTS OF
SNAP GENERAL WORK REQUIREMENTS

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Working Paper 32441
<http://www.nber.org/papers/w32441>

NATIONAL BUREAU OF ECONOMIC RESEARCH
1050 Massachusetts Avenue
Cambridge, MA 02138
May 2024

We thank Elizabeth Cox for helpful research assistance. We are grateful for helpful comments from Marianne Bitler, Amy Finkelstein, Tatiana Homonoff, Laura Tiehen, Michele Ver Ploeg, and Jim Ziliak. We learned about the experiences of applying for means-tested benefits and working while receiving benefits from listening to The Uncertain Hour podcast and through in-depth conversations and shadowing program administrators. The views expressed herein are those of the authors and do not necessarily reflect the views of the National Bureau of Economic Research.

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NBER Working Paper No. 32441
May 2024
JEL No. H75,I38,J22

ABSTRACT

We provide the first evidence on the disenrollment impacts of SNAP's General Work Requirements, which apply to 28% of SNAP households, including many with young children. We leverage a regression discontinuity design based on the age of the youngest child in the household relative to the date of eligibility recertification---once the youngest child turns six, many heads of household become subject to General Work Requirements. We use novel administrative SNAP data, linked with state Unemployment Insurance earnings records, and find these requirements have important SNAP disenrollment effects, negative spillover effects to other members of the household, and no large impacts on labor supply. Additionally, the main mechanism through which these disenrollment effects occur is through referrals to the mandatory state Employment and Training program.

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1 Introduction

The Supplemental Nutrition Assistance Program (“SNAP”; formerly known as the Food Stamp Program) is a crucial part of the safety net in the United States, providing benefits to roughly 41 million Americans per month to help them maintain a nutritious diet. SNAP is now the only nearly universal means-tested safety net program in the U.S. In part because of concerns over potential reductions in labor supply caused by SNAP, work requirements in SNAP expanded in 1996, and have been revised multiple times since then. Work requirements are meant to encourage individuals deemed “work-ready” to increase or maintain their work effort by withholding benefits if a person is not working a minimum number of hours, engaged in certain training or education programs, or (for some programs) actively looking for employment.

This paper provides the first empirical evidence of the causal effect of SNAP’s General Work Requirements on program participation and labor supply. The work requirements in SNAP that have garnered the most attention, both in academic circles and on the policy stage, are the “able-bodied adults without dependents” (ABAWDs) Work Requirements. These apply to people of working-age who do not have any children or other dependents in their household, and cannot prove they are exempt due to disability—roughly 7% of all SNAP recipients. In contrast, SNAP also imposes a set of General Work Requirements that apply to 28% of all SNAP households, and almost half of these households have children in them. These require that non-disabled, working-age beneficiaries take a job if offered, and not voluntarily quit or reduce their hours without good cause. Repeatedly failing to comply with General Work Requirements leads to sanction—a loss of benefits for up to 6 months—and benefits are only reinstated when people become compliant. Additionally, if SNAP recipients are deemed subject to the General Work Requirements, they may be referred to the state’s Employment and Training (E&T) program and can be required to complete various activities in this program in order to satisfy the General Work Requirement.

We study the effects of General Work Requirements using high-quality administrative data for one state in the mountain-plains region (hereafter “the mountain-plains state”). In the mountain-plains state, SNAP program administrators reported that very few cases are removed from SNAP for violating the General Work Requirements. This is in part because households can be exempted from these requirements for “good cause”;¹ for example, for illness or lack of adequate child care, and, in many cases, “good cause” exemptions are able to be found. If program administrators say that General Work Requirements rarely result in cases being removed from SNAP due to sanctions, why might these requirements still impact participation? A growing literature in social sciences explores the consequences of application costs and administrative burdens in affecting program participation (recently summarized by Herd and Moynihan, 2018). A consistent theme in this literature is that even seemingly innocuous burdens meaningfully deter program participation, including in the SNAP program (Giannella et al., 2023; Cook and East, 2023).

In the context of General Work Requirements, there are several costs put on potential participants. First, there is the cost of proving one is exempt from these requirements, which is not straightforward. Second, there is the cost of keeping up work activities to satisfy the requirements and continuously providing documentation to the SNAP offices to prove compliance with the requirements. Third, there is a much larger cost put on those referred to the state E&T program, because in the mountain-plains state, as in many other states,² once a recipient is referred to the E&T program, they are required to complete additional activities in this program in order to remain compliant with General Work Requirements and to continue receiving

¹<https://www.fns.usda.gov/snap/covid-19-voluntary-quit-good-cause-policy-clarification>

²As far as we are aware, there is no comprehensive database that includes information about state’s E&T programs. We are in the process of gathering this information manually from states and plan to release it as a Brookings and/or USDA report sometime later this year.

SNAP.

Our data includes detailed information on households receiving SNAP, including the demographics of household members, and when the household must recertify eligibility to continue to receive SNAP—typically every six months in the mountain-plains state. We use a regression discontinuity design leveraging the fact that SNAP beneficiaries are exempt from General Work Requirements if they care for a child under the age of 6. We calculate age-in-months for everyone in each household already receiving SNAP. Combining the exact age of the youngest child in the household with the exact date of eligibility recertification, we can identify which households are narrowly subject to, or exempt from, General Work Requirements at recertification, because the youngest child in the household is just above or below the age-6 cutoff. Thus, the main identification assumption is that households in which the youngest child narrowly turns 6 before recertification are otherwise identical to households in which the youngest child narrowly turns 6 after. We demonstrate the validity of this assumption by showing balance in observable characteristics around this cutoff, demonstrating there’s no bunching in the age-relative-to-recertification variable around the cutoff, and conducting several placebo tests.

Our main analysis sample includes households receiving SNAP between 2011-2018, with only one working-aged adult (over 80% of working-aged SNAP households with young children), who are not exempt from General Work Requirements for other reasons (e.g. disability) and where the youngest in the household is near age 6 at the focal recertification. We find very clear evidence that General Work Requirements reduce SNAP receipt, but only among the household heads—the only household member that is directly subject to the work requirements. The rest of the household continues to receive SNAP, even as the head loses benefits. However, since SNAP benefits are a function of the number of eligible household members, the size of the SNAP benefits paid to these households shrinks. Thus, these policies have important spillover effects on other members of the household not directly subject to the work requirements, including many children.

We leverage the richness of our data to investigate the mechanisms behind this effect and document that referral to the state’s mandatory E&T program likely drives the reduction in head’s SNAP receipt. In particular, the timing of the drop in head’s SNAP receipt lines up with when the head would be required to participate in the mandatory E&T program. And, the effects are larger among the subsample that, based on their observable characteristics, are more likely to be referred to E&T. The E&T program requires participants to utilize job search assistance services including online trainings, make at least 48 job contacts in a three-month period, and meet with their assigned caseworker regularly to discuss their progress. For this subsample, households lose \$241 in SNAP benefits over a six-month period, or roughly 9% of their monthly benefit amount in each month.

We scale our main intent-to-treat estimates by the percent of the sample that is referred to E&T. An E&T referral reduces the number of months the head is receiving SNAP benefits by three months over a six-month period. This also reduces total household benefits received over this six-month period by roughly \$787—the dollar value equivalent of roughly 1.7 months of baseline benefits. The fact that E&T work requirements substantially reduce benefits for cases with young children (i.e., the LATE we estimate) is striking given that young children are particularly sensitive to reductions in nutritional resources (East, 2020; Hoynes et al., 2016).

Our data also allows us to observe the impact on labor supply using Unemployment Insurance earnings data linked to the SNAP data. We see no large or statistically significant changes in employment or earnings when households are subject to the General Work Requirements.

This is the first paper to causally examine the impacts of the General Work Requirements, and the

related E&T requirements. However, it is informative to compare our findings to the papers on ABAWD Work Requirements. The papers that use high quality and precise administrative data to identify who is subject to ABAWD Work Requirements and to observe SNAP participation, consistently find large decreases in SNAP participation as a result of the ABAWD Work Requirements, with no change in employment (Gray et al., 2022; Stacy et al., 2018; Vericker et al., 2023).³

More broadly, our paper adds to mounting evidence that administrative burdens reduce the likelihood that households receive benefits. Of interest is not only whether participation changes, but *for whom* participation changes (Finkelstein and Notowidigdo, 2019). Neoclassical theory posits that transaction costs (aka “ordeals”) will screen out the least needy Nichols and Zeckhauser (1982) because these costs will be larger than the potential benefits they would receive from the programs, leading to efficient levels of “self-targeting”. On the other hand, behavioral economics predicts that the neediest may be the ones most deterred (Bertrand et al., 2006), for example, because the cognitive bandwidth tax imposed on those in poverty makes the transaction costs larger or informational barriers harder to overcome. We explore whether General Work Requirements affect the targeting of SNAP and find suggestive evidence that, if anything, targeting is worsened as a result of this policy.

The rest of the paper proceeds as follows. Section 2 describes the SNAP program and various work requirements. Section 3 describes the data and sample. Section 4 outlines our empirical approach and discusses the descriptive analysis. Section 5 discusses the main results and Section 6 concludes.

2 Institutional Background

SNAP (formerly the Food Stamps program) is a means-tested federal entitlement program, in which states are responsible for determining eligibility and paying out benefits. In general, to qualify for SNAP, applicants must have gross income below 130 percent of the federal poverty level and net income after deductions below 100 percent of the federal poverty level. Households with zero and near-zero income receive maximum SNAP benefits, which are a function of household size. If some members of the household become ineligible to receive SNAP, the household benefit amount is lowered. As a household’s income increases, benefits are decreased by the benefit reduction rate.⁴ Benefits are paid out automatically each month on electronic benefits transfer (EBT) cards, which are used like a debit card for qualifying food purchases at SNAP-accepting stores. Households that receive SNAP benefits are required to recertify periodically to demonstrate their continued eligibility. This involves updating paperwork and documentation and can require an interview with a caseworker. In the mountain-plains state, recertifications happen every six months for almost all working-age households.

There are two types of work requirements in SNAP—General Work Requirements and ABAWD Work Requirements. Additionally, recipients subject to the General Work Requirement may be referred to participate in the state’s Employment and Training Program. We describe these and the existing literature on

³Another set of papers uses survey data that may suffer from issues of program participation mis-measurement (Meyer et al., 2022) and imprecise identification of who is subject to the ABAWD work requirements. These papers have more mixed findings on labor supply, but, if they look at program participation, they also find decreases in participation among those subject to work requirements (Ribar et al., 2010; Cuffey et al., 2022).

⁴SNAP’s benefit reduction rate is 30%; however, the actual benefit reduction rate as income increases varies by the types of deductions the household has and is very close to zero at low income levels (Bitler et al., 2021; Han, 2022). SNAP-allowable deductions include a 20 percent deduction for every dollar of earned income, as well as deductions for certain types of expenditures including costs for shelter, childcare, and medical care. Households participating in multiple programs may have a more complicated benefit reduction rate. There are also asset tests and residency tests for non-citizens that vary by state and time.

each next.⁵

2.1 General Work Requirements

First, General Work Requirements apply to working-aged SNAP recipients who do not meet the following list of federal exemptions: working at least 30 hours per week or having weekly earnings equivalent to 30 hours of minimum-wage work, meeting work requirements for another program, taking care of children under 6 or an incapacitated person, having a physical or mental disability, participating in a drug or alcohol program, or being enrolled in school or a training program. Those subject to these requirements are called “work registrants” and they must not voluntarily quit or turn down a job offer and not voluntarily reduce hours below 30 hours per week.

If work registrants do not meet these requirements, then they are sanctioned and lose SNAP benefits. However, it is important to note that if a work registrant is sanctioned, the other members in their household can continue to receive SNAP benefits, but the household benefit amount will decrease. In our sample period, 2011-2018, 28% of all SNAP households have at least one work registrant in the household who is meeting the requirements or has been given a waiver, according to SNAP Quality Control (QC) Data. In the mountain-plains state, 12% of all households have a work registrant meeting requirements. Note, this is lower than the national percent, and, a large part, but not all, of this difference can be explained by differences in observable demographics in the mountain-plains state compared to the full country.

When applicants apply for the first time or recertify their eligibility, they are screened for whether they are subject to General Work Requirements. If they are subject to them, they are verbally made aware of the requirements they face, along with the consequences of failure to comply. They also receive mailers reminding them of the requirements. Figure A1 shows an example mailer from the mountain-plains state that is sent out to those subject to the General Work Requirement. The boldface font and strong language—e.g., “You must follow these General Work Requirements to keep your SNAP benefits” or “You may lose your SNAP benefits if you don’t follow these work requirements”—highlights the consequences of failing to comply—loss of benefits for 1, 3, and 6 months for multiple violations. In conversations with state administrators, we learned that the caseworkers are trained to stress these work requirements and their accompanying sanctions at time of application and recertification, even though, according to these administrators, the sanctions are almost never imposed in practice.

However, sanctions and removal of the entire household from SNAP is only one measure of the bite of these requirements. Therefore, it is important to investigate empirically whether these requirements have any impacts on participation, especially since they reach such a large percentage of the SNAP population, many more than are affected by the ABAWD Work Requirements. And—unlike for ABAWDS—cases subject to the General Work Requirement often have young children who face severe nutritional risks from potentially losing benefits (East, 2020; Hoynes et al., 2016). It is possible that even though sanctions are rare, the *threat* of these work requirements being enforced, or the *burden* placed on applicants to show they are exempt from these requirements, deters SNAP participation. In our analysis, we will examine cases newly subject to the requirements when they recertify their SNAP eligibility. In this instance, cases that are newly subject must satisfy the requirements beginning the month after recertification. We show a timeline of policies relative to recertification in Appendix Figure A2.

⁵Information from www.fns.usda.gov/snap/work-requirements and a Hamilton Project report co-authored by Chloe East on SNAP work requirements: www.hamiltonproject.org/publication/paper/a-primer-on-snap-work-requirements/.

2.2 ABAWD Work Requirements

The second set of work requirements are for “able-bodied adults without dependents” (ABAWDs) and were added to the program in 1996. ABAWDs are also considered “work registrants” and must comply with the General Work Requirements as well. Until recently, ABAWDs were defined as those between the ages of 18-49, who report having no disabilities, are not pregnant, and do not take care of any dependents (e.g., children, people with disabilities, or the elderly). Recent federal law changed the definition of ABAWDs by extending the maximum age and creating new exemptions for veterans, homeless individuals, and young adults who were in foster care. There are waivers for ABAWD work requirements that states can apply for if they are facing economic hardship. Additionally, the federal government has waived these requirements in each of the recent major recessions. Those subject to the ABAWD requirements—about 7% of all SNAP recipients according to SNAP QC data—must complete minimum work activity and report this activity, otherwise they are eligible to receive only three months of SNAP benefits within a 36-month period. The minimum work activity is at least 80 hours per month of employment or job training, and, notably, time spent searching for work does not count towards this requirement (as it does with other programs such as Unemployment Insurance).

There are a handful of studies on the impact of these ABAWD Work Requirements. These studies have mixed findings, with some finding no effects of imposing work requirements on labor supply (Stacy et al., 2018; Vericker et al., 2023), and some finding small positive effects (Cuffey et al., 2022). Recent analysis by Gray et al. (2022) uses high-quality administrative data and a regression discontinuity design based on the maximum age of people subject to the requirement (49), and finds no effect on employment, but a large negative effect on SNAP receipt. The authors hypothesize that the null effect on employment is potentially due to other barriers to work that SNAP recipients face.

2.3 Employment and Training Programs

Another important—and under-studied—aspect of SNAP work requirements is the Employment and Training (E&T) program. If SNAP recipients are deemed subject to General Work Requirements, they may be referred to their states E&T program. Roughly 25 percent of work registrants participate in E&T programs nationally and, in the mountain-plains state, 8% of work registrants participate in E&T programs.⁶ For anyone referred to E&T, participation in E&T for three consecutive months satisfies the program’s requirements and the participant is exempted from being referred back to E&T for the next twelve months. Work registrants who are referred to E&T receive an extended mailer that discusses the E&T component of the program (see Appendix Figure A3). This portion of the mailer contains similar strong language and boldface font that highlight the consequences of failing to comply.

States are required to implement an E&T program but the nature of the program varies by state. Each state determines whether their program is mandatory or voluntary, what kind of training is available, and who the program is intended for. The program’s flexibility was intended to best meet the needs of local labor markets. States similarly have the ability to determine the training components offered. Allowable components include job search, workfare, work experience or training, educational programs, self-employment programs, or job retention (Kaz et al., 2018). Additionally, states may involve third-party partnerships to operate their programs. This not only provides funding for their programs, but also allows them to contract

⁶Additionally, because ABAWDs are also subject to General Work Requirements, they are eligible to be referred to E&T as well. 20% of ABAWDs participate in E&T programs nationally and in the mountain-plains state roughly 10% of ABAWDs participate in E&T programs.

out E&T eligibility determination, staffing, program referral, and program administration.

The E&T program in the mountain-plains state is mandatory for those who are referred, which means that if those referred to E&T fail to participate without excusable cause (for examples, those receiving Refugee Cash Assistance, those with no fixed address, or English Language Learners) they may lose SNAP benefits for 1, 3, or 6 months, until they comply again, or have an excusable cause. The mountain-plains state does not use third-party partners. The program consists of job search services intended to help participants find employment, stay employed, and increase household income. In particular, there is an assessment to identify barriers to employment and workshops to improve employment skills. Participants are required to make 48 job contacts over a three-month period and are required to complete online workshops. Workshops focus on resume writing, interviewing, networking, or identifying and marketing skills. Moreover, E&T participants must meet with an assigned E&T-specific caseworker once a month to discuss their job search activities and to come up with an individualized plan to become employed. These individualized plans can contain additional job-search activities that participants must complete in order to remain eligible to receive benefits. In the mountain-plains state, work registrants (those subject to General Work Requirements) who are younger than 47, are determined to be able to work, have no earned income, and are not exempt though other criteria, are eligible to be referred to E&T. We use this criteria to split the sample below based on whether work registrants are likely additionally subject to mandatory E&T or not.

Despite the breadth of these programs, retention in E&T programs is low. A report by the USDA estimated completion of programs in a pilot studying effectiveness of E&T training in 10 states (Malbi et al., 2021). Completion rates of job search services were highest and basic education completion rates were lowest, with about 60 percent completion rates for most job search programs and completion rates of basic educational programs ranging from only 10 to 38 percent.⁷ This likely reflects the fact that some programs take upwards of months to fully complete, and individuals frequently can't forgo earnings long enough to participate in more meaningful training beyond job search services. This pilot study finds that for some, non-completion reflects individuals finding employment, but for many it was reflective of larger barriers to participating (such as lack of transportation or childcare). Barriers to E&T participation were larger than caseworkers anticipated and services provided to mitigate those barriers weren't always effective. Furthermore, there were no consistent and meaningful impacts on employment, earnings, or food insecurity.

In our analysis, we look at cases that are newly eligible to be referred to E&T because they are newly subject to the General Work Requirements at recertification. We can also directly observe referral to and participation in E&T, and we document that most E&T referrals happen in the two months after recertification, so participants will not have to meet E&T requirements until at least the second month after the recertification (one month after the earliest referrals take place). Again, this policy timing is shown in Appendix Figure A2.

3 Data

Our data come from a single state in the mountain-plains region, which remains unidentified for anonymity. We observe SNAP applicants and beneficiaries from 2011 through 2022. We also observe the dates and outcomes of eligibility recertifications for beneficiaries. Among beneficiaries, we observe detailed information about the composition of their household and demographics of each household member. In our prior paper,

⁷Basic education includes adult basic education, General Education Development (GED), high school equivalency preparation, reading or math education, or English as a second language (ESL). [from https://fns-prod.azureedge.us/sites/default/files/resource-files/SNAP-ET-FinalReport.pdf](https://fns-prod.azureedge.us/sites/default/files/resource-files/SNAP-ET-FinalReport.pdf)

we show that the population of SNAP recipients in the mountain-plains state is very similar to all SNAP recipients nationally, with the exception that our state has fewer non-white recipients (Cook and East, 2023), and we do a similar comparison here below.

These data are linked to quarterly labor supply information from the state’s Unemployment Insurance (UI) database. This type of data has been used in the past to evaluate the labor supply effects of other means-tested programs such as Medicaid, public housing, and SNAP (Baicker et al., 2014; Chyn, 2018; Gray et al., 2022). The UI records contain the earnings and industry of each individual and job by quarter from 2011-2021. Importantly, we can observe these outcomes whether or not the household is receiving SNAP. A limitation of any study using UI earnings data to measure labor supply is that a small group of workers are excluded from the data because they work in jobs not covered by UI, such as those who are self-employed. We show in other work that this is unlikely to impact our results (Cook and East, 2023), and below we confirm that the earnings measured in the UI data are very similar to total earnings that SNAP recipients report on their SNAP forms. Similarly, the state only matched the head of the household for each application as a data security measure. Over 80% of SNAP households with children near age 6—our main analysis sample—have only one working age adult in them, so we chose to limit our main sample to households with only one working age adult to ensure we don’t miss important secondary earner effects. Results are similar when we include two-adult households.

3.1 Sample Construction

To estimate the impact of General Work Requirements and the accompanying E&T program, we start with the full sample of SNAP eligibility recertifications observed from 2011 to 2018 (to avoid the COVID era). We then make several sample restrictions to isolate the group of beneficiaries who are narrowly on either side of the age-6 cutoff for the youngest child in the household. First, we balance the sample by keeping recertifications with valid outcome information 3 months before and 12 months after a given recertification. Next, we drop SNAP households (aka “cases”) for which the youngest in the household is exactly 6 during the month of, month before, and month after recertification. This helps account for measurement error in the children’s age-in-month variable since we construct this variable ourselves.⁸ We further drop the recertifications for which we cannot infer all children’s ages-in-months within the household. Finally, we keep case-recertification combinations where the youngest recipient in the case is between 3 to 9 at the time of recertification. Notice that under these conditions, a given case will appear multiple times in the data; once for each six-month cycle they are receiving benefits. Because labor supply outcomes are matched to the head of the case, we keep cases for which the head of the case is receiving SNAP before the recertification when their youngest child is close to 6, the “focal recertification”.

Next, we limit the sample to only cases that would likely be subject to the General Work Requirement, ignoring the youngest-child-age-6 exemption. Specifically, we consider the case to be otherwise subject to the General Work Requirement if the head of household is between the ages of 16 to 59, is not disabled, is not in a household with any disabled recipients, is not receiving TANF, and is not a full-time or half-time student. Once we make all of these restrictions, over 80% of the sample is a single adult household, so we restrict our final analysis sample to be only single adult households to ensure we observe the labor supply of

⁸We only observe age measured in years, so we infer the age-in-months of each recipient using the information of SNAP recipients. For recipients, we observe detailed information about case demographics and program information such as work requirements faced for everyone on the case during each month that they receive benefits. When participants have a birthday, their age updates in the data, even during the middle of a recertification cycle. When we observe a participant’s age increment, this identifies the given birth month. Using this procedure we are able to infer birth month for roughly 90 percent of beneficiaries.

all adults. Another benefit to focusing on these cases is that we can better characterize exposure to General Work Requirements. Each child under 6 exempts one adult, so in single adults household, we know the adult is exempt. This leaves us with an analysis sample of 86,863 case-by-recertification-cycle observations.

3.1.1 Summary Statistics

To understand the external validity of our findings, we explore how SNAP recipients who successfully recertified eligibility in the mountain-plains state differ from SNAP recipients who successfully recertified eligibility in the whole country, using the SNAP QC Data, in the first two columns of Table A1. On most dimensions the mountain-plains state is similar to the national sample, however, the mountain-plains state is less racially diverse. Importantly, the mountain-plains state is similar to the national sample in terms of employment and earnings.

We compare these statistics to all cases needing to complete a recertification—whether or not the recertification was successful—in the mountain-plains administrative data in column (3). The administrative data looks similar to the QC data, as expected. Again, importantly, the earnings and employment statistics in the mountain-plains data—measured using UI data—are very similar to those in the QC data—measured by individual reports to the SNAP offices. This is reassuring that the UI data does a good job capturing the earnings of SNAP recipients.

Next, in column (4), we further restrict to cases who are likely subject to the General Work Requirements. Column (5) is the same as column (4) except further restricting to cases where the youngest child is within 5 months of age 6 at the focal recertification. These samples are very similar to the full sample of cases recertifying in column (3), suggesting that our results may be plausible generalized.

Finally, columns (6) and (7) show our main analysis sample, which further restricts to those likely subject to E&T requirements. Column (6) presents the full analysis sample and column (7) presents a subsample whose child is within 5 months of age 6 at the focal recertification. The analysis sample is similar to all recertifications in the state. However, earnings and employment are lower, when restricting to those potentially eligible for E&T. This is because, when restricting to those being possible subject to E&T, we condition on individuals with near zero earnings.

4 Empirical Design

Our main analysis uses a regression discontinuity design based around the youngest-child-age-6 threshold for General Work Requirements. We create a running variable for each case that is the age-in-months of the youngest child in the case *at the month of the focal recertification*. The timing is crucial because even if a child turns 6 in between recertification dates, the case does not become subject to General Work Requirements, and possibly referred to E&T, until the next recertification. This further strengthens our design because any confounding factors would have to not only change when the youngest child turns 6, but this change would have to occur at the next recertification *after* the child turns 6. Thus, we can rule out confounding factors such as the youngest child starting school once they turn age 6, since recertifications happen throughout the calendar year and the child would need to differentially start school on or around the recertification date.

4.1 Descriptive Analysis

We first explore dynamics in benefit receipt of those narrowly above and below the age-6 cutoff at recertification. For this analysis, we keep only recertifications where the youngest child in the case is 5-years-7-months old to 6-years-5-months old at the time of the focal recertification. This restriction ensures that there is only one focal recertification included for each case and includes 10,211 relevant cases. This group will narrowly fall on either side of being subject to the General Work Requirement at the focal recertification, based randomly on when their youngest child turns 6 *relative* to the time of recertification.

The key identifying assumption in this context is that potential outcomes of cases are smooth across the age-6 threshold—or, put differently—that cases that are narrowly subject to General Work requirements are not systematically different from those that are narrowly exempt. We test this in Appendix Table A2 by regressing whether the youngest child in the case is older than 6 on case demographics measured in the SNAP administrative data as well as labor supply information from the Unemployment Insurance earnings records. Column (1) shows the set of recertifications that satisfy all of the sample restrictions detailed in Section 3.1, and restricts to cases where the youngest child is within 5 months (on either side) of the age-6 threshold at the time of the focal recertification. Column (2) additionally restricts to cases that are likely eligible to be referred to the SNAP E&T program. Specifically, the case is likely eligible to be referred if the head is between the ages of 16 and 47, did not report any earned income during their previous recertification interview, and is not a refugee, pregnant, nor receiving disability insurance or worker’s compensation. Observable characteristics, including pre-recertification labor supply, do not correlate with the above-age-6 indicator, supporting the identifying assumption. There is, however, a significant coefficient on the female head of household indicator variable, but this coefficient is small relative to the sample mean of about 0.90. And, moreover, the F statistics are 0.77-1.36.

Figure 1 plots benefit receipt, as well as referrals and participation in E&T around the focal recertification. Unfortunately, we do not directly observe whether the case is subject to General Work Requirements, so we can not analyze this first stage explicitly. The solid black line shows the mean of the various outcomes among cases that are newly subject to General Work Requirements (i.e., youngest age is 6 years and 2-5 months old at the focal recertification) and the dashed gray line shows the outcomes for cases that remain exempt (i.e., youngest age is 5 years and 7-10 months). In each panel, the horizontal axis depicts event time in months relative to the focal recertification, with the month of the focal recertification denoted as 0. The month of focal recertification (t) is the last month of that certification window, so cases can continue to receive benefits through the end of this month even if they do not recertify. As soon as the case recertifies, the adults in the case are told if they are newly subject to the General Work Requirements; if they are, they must meet these requirements beginning one month later (at $t + 1$). Six months later, at $t + 6$, cases go through the next recertification round, and, after this recertification, *all* cases in this sample are likely subject to the General Work Requirements, because all cases have their youngest child above age 6.

Importantly, as we explained above, while the General Work Requirements begin to bind at $t + 1$, if individuals newly subject to the General Work Requirements are additionally referred to the mandatory E&T program, this referral generally does not happen until at least $t + 1$. Cases that are referred to E&T are required to participate in E&T during the *following month*, or they face sanctions. Thus, while any effect of General Work Requirements should begin at $t + 1$, any effect of E&T is expected to begin *after* $t + 1$ (see Appendix Figure A2). We directly examine the timing of E&T referral and participation in this analysis to shed light on which set of requirements drives the results.

In panels (a) and (b) of Figure 1, we look at whether the case received benefits at all, and the monthly

benefit amount. There is a reduction in benefit receipt for both the treated (newly subject to General Work Requirements) and control (still exempt from General Work Requirements) groups in the month after the focal recertification. Only about 82% of those previously receiving benefits still receive them at $t + 1$ (panel (a)) and the average monthly benefit amount (inclusive of zeros) falls by about \$100 (panel (b)). Past work has also documented that recertification is a common time that participants fall off the program, either because they are no longer eligible, or because of the costs and administrative burdens associated with recertifying eligibility (Unrath, 2024; Homonoff and Somerville, 2021). After the initial drop in $t + 1$, there is a small rebound at $t + 2$, as some people who did not recertify by the initial deadline complete recertification within 60 days of the initial deadline, and receive benefits again, without having to complete a brand new application. Then, receipt and benefit amount slowly decline until the next recertification, after which we observe the same pattern as after the focal recertification.

Next, in panel (c), the outcome is whether the head of household for the case receives benefits. This is an important outcome because if the head does not satisfy work requirements, the head will be disqualified from receiving benefits, but others in the household can still receive benefits. There is an immediate drop off in the likelihood the head receives SNAP for *both* groups. But, in subsequent months, the gap between the two groups grows over time, so that, from months $t + 2$ to $t + 6$, the likelihood that the head receives SNAP is much lower for the group newly subject to the General Work Requirements compared to those still exempt. This happens because between $t + 1$ and $t + 2$ SNAP receipt among the control group increases slightly and then stabilizes, as some people who initially didn't complete their recertification do so. On the other hand, among the treatment group, the head's receipt of SNAP steadily declines over time. Finally, after the subsequent recertification at $t + 6$, after which both groups are subject to the requirements, head's receipt of SNAP converges, as expected, which provides support for our identifying assumption.

The timing of the effect in panel (c) suggests that the mechanism that causes the reduction in head's participation in SNAP is not the General Work Requirements themselves—in which case we would see a differential effect between the groups at $t + 1$ —but rather something that occurs after this period. To understand this, we explore whether and when the head of household is referred to the E&T program in panel (d). This reveals an interesting and important dynamic pattern of results—there is a clear increase in referrals to E&T (about 10%) among the treatment group after the focal recertification. And, an additional 5% are referred in the following month ($t + 2$). As expected, we also see that after the subsequent recertification, when both groups are now subject to General Work Requirements, there is an increase in referrals for both groups.⁹

Panel (e) illuminates how these referrals translate into actual participation in E&T. A much smaller fraction participate in E&T than are referred—roughly 15% of cases were referred to E&T in the first two months after the focal recertification in panel (d), but only about 5% of cases *participate* in E&T in those same months, with similar participation rates in the subsequent months. Unless the cases can provide good cause for not participating, this gap between E&T referrals and participation should result in sanctions and a loss of benefits.

The timing of referral to, and participation in E&T, explains the dynamics in head's SNAP receipt we find in panel (c). In particular, we see the receipt of the treated heads decline by more than the control group in exactly the same months that E&T referrals and participation occur. This is in contrast to the

⁹There are still referrals in $t + 7$ for those who we think should have been initially treated at $t + 1$. This occurs because we must infer whether a case is subject to various requirements and there is noise in this assignment. Caseworkers also subjectively refer cases E&T, so it is possible that the worker initially decided not to refer a case during the focal recertification, but then decided to refer at the subsequent recertification. The key idea is that cases are only eligible to be referred to E&T once they are subject to General Work Requirements.

decline in head’s receipt we see in $t + 1$, which is the same magnitude for both groups. This corresponds to the timing of E&T, rather than the timing of the General Work Requirements themselves.

We investigate the role of E&T further in Figure 2. Here we split the sample from the previous figure into those more and less likely to be referred to E&T. We do this by taking advantage of categorical eligibility rules that exempt work registrants from E&T requirements. Specifically, we are able to observe the following categorical E&T exemptions in the data: being 47 or older, pregnancy, receiving refugee aid, receiving disability insurance, and having positive amounts of earned income.

Panels (a), (c), (e), (g), and (i) show the outcomes for those more likely to be referred to E&T if they are subject to General Work Requirements and (b), (d), (f), (h) and (j) show the outcomes for those less likely to be referred if they are subject to General Work Requirements. Indeed, after the focal recertification, for the treated group, the likelihood of being referred to and participating in E&T is much higher for the panels on the left than on the right. And, importantly, the gap in head’s receipt of SNAP benefits is much larger for the group more likely subject to E&T. This provides further evidence that the main mechanism through which General Work Requirements impact SNAP participation is through referral to E&T.

4.2 Regression Discontinuity Design

Next, we turn to a formal regression discontinuity design that exploits the same source of variation arising from the age-6 cutoff as shown in the descriptive results above. The running variable, X , is the age of the youngest child within the case, measured during the month of the focal recertification. The assignment variable D is a dummy equal to 1 if the youngest child is 6 or older at the given recertification and 0 otherwise. We estimate the impact of General Work Requirements with the following specification:

$$Y_{ir\tau} = \alpha_1 + \tau D_{ir} + \beta_1 X_{ir} + \beta_2 X_{ir} D_{ir} + \epsilon_{ir\tau} \quad (1)$$

where $Y_{ir\tau}$ is the outcome of interest for case i , measured τ periods (either months or quarters) relative to the case’s focal recertification, r . We implement this design using the data-driven local polynomial regression discontinuity approach with robust bias-corrected confidence intervals from Calonico et al. (2017).¹⁰ We implement a donut regression discontinuity approach; we drop cases where the birth month of the youngest child happens in the month of, month before, or month after the focal recertification. We generate regression discontinuity estimates using a triangular kernel with separate Mean-Squared-Error-Optimal-Bandwidth selectors (above and below the cutoff), and we cluster standard errors by case, because cases can appear multiple times in the sample. Our main analysis generates the intent-to-treat effect of being likely subject to the General Work Requirements and possibly being referred to E&T. However, we also scale our results by the share of cases referred to E&T, since this appears to be the primary mechanism driving effects on SNAP participation.

To provide supporting evidence for the identification assumption, we show in Appendix Table A2 that observable characteristics of the cases are balanced across the age cutoff. Appendix Figure A4 also shows that densities of cases are smooth across the age cutoff for cases in our main sample. Statistical tests from Cattaneo et al. (2018) fail to reject the null of a break in the density at conventional levels of statistical significance. And, lastly, in Appendix Figure A5, we look at the rates of SNAP participation in the CPS by the age of the youngest child in the household and demonstrate there is no jump at age 6.

¹⁰We implement this estimator using `rdrobust` in Stata.

5 Regression Discontinuity Estimates of the Effect of General Work Requirements

5.1 SNAP Participation and E&T Participation Outcomes

Table 1 shows the formal regression discontinuity estimates that correspond to the descriptive analysis above. In this analysis, we focus on the group of cases who we predict are *more* likely to be referred to E&T training when their youngest child turns six and they become subject to General Work Requirements.¹¹ The rows indicate different outcome variables and columns indicate time relative to the focal recertification measured in months for benefit outcomes, and in quarters for labor supply outcomes. In the final columns, we show cumulative effects over the given six-month period for each benefit outcome, and over three quarters for each labor supply outcome.

Looking at referrals to and participation in E&T, the results are the same as in the descriptive analysis—there is a significant 24 percentage point increase in the likelihood of being referred to E&T in the first month after recertification and a significant 14 percentage point effect in the second month. Participation in E&T follows this same pattern but lagged—there is a 5 percentage point increase in participation in the second month after and a 6 percentage point increase in the third month after.¹² Cumulatively, there is an increase in E&T referrals of 42 percentage points and an increase of 0.20 months of E&T participation over the six months (the recertification cycle) following the focal recertification.

Turning to benefit receipt in the third through fifth rows of Table 1, these results again confirm what we saw above. In particular, there is little significant impact on overall household-level benefit receipt. But, there is a decline in the likelihood the head receives benefits beginning in the second month after recertification, and this drives the significant decline in total household benefit amount, which also begins in the second month after recertification. Recall, this is because household benefits are in part a function of the number of household members who are eligible for and receiving benefits, so, if the head becomes non-compliant with work requirements, the household benefit amount will decrease. The magnitude of this decrease is meaningful—there is about a 10% decline in monthly benefit amounts, and roughly a 19-percentage-point decline in head’s receipt of SNAP in the following four months. In the final column, over the six months following the focal recertification, the case loses \$241 of benefits, and the case head is included on the case for roughly 1 fewer month.

Finally, to help interpret these estimates, we scale the estimated cumulative effects on SNAP receipt by whether the case is referred to E&T at all over this 6-month window. As with any fuzzy regression discontinuity design, this further assumes that the only mechanism through which the instrument operates—i.e., narrowly being subject to General Work Requirements because of the age-6 cutoff—is through being referred to E&T. This would be violated if passing the cutoff also exposes beneficiaries to other effects of the General Work Requirements. However, the results above led us to conclude E&T drives these changes because we only observe effects for the subgroup who is more likely referred to E&T. Thus, attributing the effects to the E&T causal channel is plausible and informative. E&T referral reduces the number of months the head is receiving SNAP benefits by three months over a six-month period. This also reduces total household benefits received over this six-month period by roughly \$787. Relative to baseline benefit

¹¹ Appendix Table A3 and Appendix Figures A6-A7 show the regression discontinuity estimates for those we predict are *less* likely to be referred to E&T.

¹² There is a small increase in likelihood of being referred to E&T during the recertification month, not shown in the table. This explains the small increase in E&T participation in the 1st month after recertification.

amounts received among this group, this is equivalent to missing out on 1.7 months of SNAP for the entire household. As with any research design, the local average treatment effect (LATE) here is estimated among the compliers—who in this setting are the cases with near-six-year-old children. The fact that E&T work requirements substantially reduce benefits for cases with young children is striking given that young children are particularly sensitive to reductions in nutritional resources (East, 2020; Hoynes et al., 2016).

Figure 3 depicts the regression discontinuity estimates corresponding to the cumulative estimates from Table 1. The x-axis of these figures is the age-in-months (measured at the month of focal recertification) of the youngest child in the case, recentered at the age-6 cutoff. Here, a value of 0 means the youngest child turns 6 during the month of recertification, while a value of -3 indicates that the youngest child on the case is 5-years-and-9-months old at the recertification. These results visually confirm the analysis in Table 1.

While we are the first to study the effects of General Work Requirements, our findings are consistent with the literature on ABAWD Work Requirements and the literature on the application costs of SNAP. The paper using the closest data and approach to ours finds that the imposition of ABAWD work requirements reduced SNAP receipt by 37%. Among those who were already receiving SNAP—similar to our analysis sample—SNAP receipt decreased by 48% (Gray et al., 2022). Giannella et al. (2023) find that giving SNAP applicants access to flexible interviews, instead of inflexible pre-scheduled ones, increases receipt of SNAP by 13% in the first month and 4% over five months. Similarly, when looking at the flexibility of recertification interviews, Homonoff and Somerville (2021) find that more flexibility in the ability to reschedule these interviews increases SNAP receipt by 22%.

5.2 Heterogeneous Effects

In Appendix Table A4, we split the main sample based on the benefit amount *per person* the household was receiving before the focal recertification.¹³ This is a proxy for the need of the household, since households with lower resources and thus greater need will receive larger benefit amounts per person. This sheds light on whether these work requirement policies impact the targeting of SNAP.

Households with below-median and above-median benefits are referred to and participate in E&T at roughly similar rates. However, households with above-median benefits—and thus higher need—have a larger drop in household benefits received. This is driven by a larger drop in the likelihood the head receives SNAP, and that the case receives SNAP at all for those with greater need. Though, these differences are not statistically significant, so there is not strong evidence these policies impact the targeting of the program.

5.3 Labor Supply Effects

Next, we turn to exploring whether General Work Requirements (driven by E&T referrals) generate any labor supply effects. Work requirements could impact labor supply in several ways. First, if the work requirements act as intended, they may create incentives and opportunities for beneficiaries to connect with jobs they otherwise would not have. Second, we document that these work requirements deter program participation, so, they may encourage work in order for those who exit the program to make up for their lost program benefits. On the other hand, past research has shown that many SNAP recipients face barriers to work due to demographics and the nature of the low wage labor market (Cook and East, 2023; Gray et al., 2022), so work requirements may have no impact on labor supply if these barriers are large enough.

¹³In Appendix Table A5 we show equivalent splits for labor supply outcomes, discussed more below.

The second panel of Table 1 (and Figure 4) shows these results. Again the rows show different outcomes, and the columns show the quarter relative to focal recertification since the earnings data is only available quarterly. We look at the likelihood the head works at all in a given quarter, earnings per quarter including zeros, the likelihood of working multiple jobs in a quarter, the likelihood quarterly earnings are greater than \$0 but below \$2,000, and the likelihood quarterly earnings are above \$2,000. We use earnings greater than \$0 but below \$2,000 as a proxy for part-time work, because \$2,000 per quarter is below the earnings level of a full-time full-quarter minimum wage job. The threshold of \$2,000 earnings per month is not particularly notable for SNAP recipients, and the results are similar using other cutoffs, such as \$1,500 or \$2,500.

Due to the nature of our empirical approach, those who are in the treated group are only exposed to an additional six months of General Work Requirements and the possibility of referral to E&T. This is because, by the next recertification, those who were in the control group and were exempt at the focal recertification, are no longer exempt as their youngest child is now also older than 6. Thus, the only contemporaneous effects of the requirements is in the first post-recertification quarter. The outcomes for the quarter of recertification could include pre-treatment months. And, the estimates for the second and third quarters should be thought of as the longer-run effects of an additional, prior, six months of exposure to these work requirements.

Across all measures of labor supply, there is no evidence of large or significant increases or decreases after the focal recertification. We can rule out cumulative changes in quarters of employment less than 0.17 fewer quarters or greater than an additional 0.20 quarters, over three quarters. We can similarly rule out changes in cumulative earnings of less than a \$638 decrease or greater than a \$540 increase over three quarters. In the second quarter, there is a significant effect on having positive earnings but below \$2,000 per quarter, and in the third quarter, there is a significant effect on the likelihood the head of household in the case works multiple jobs. But, overall, there are no significant effects, or effects in a consistent direction, on either of these outcomes.

These results echo findings in the extant literature. Cook and East (2023) find that most SNAP recipients face other barriers to work and that exogenous receipt of SNAP benefits does little to change labor supply decisions for these households. Against that backdrop, it is perhaps not surprising to see that additional training, or loss of benefits, does little to influence labor supply choices in this context. Our findings also build on previous work that documents a similar pattern for ABAWD Work Requirements—a large drop in benefit receipt with no large changes in labor supply (Gray et al., 2022). We show here a similar pattern for work requirements that have previously garnered much less attention. This is particularly important given that the General Work Requirements apply to many more recipients, including many cases with young children.

6 Conclusion

This paper examines the effects of SNAP General Work Requirements on benefit receipt and labor supply using a regression discontinuity design taking advantage of when the youngest child in the household turns six, relative to the eligibility recertification date. We are the first to rigorously examine the General Work Requirement and its accompanying Employment and Training program. We show that General Work Requirements have no detectable effect on whether the household receives benefits at all, but that household benefit amounts decline. We reconcile these results by documenting that households newly facing General Work Requirements are more likely to have the head of household—the only one actually subject to the requirements—lose benefits, even though the rest of the household continues to receive SNAP.

The pattern of benefit losses for household heads is most consistent with the timing of referral to SNAP's E&T program—a key policy under the General Work Requirement's umbrella. As a result, we focus on the set of SNAP recipients who we predict are eligible to be referred to E&T when their youngest child turns six. Among this group, we estimate that roughly 40 percent are referred to E&T over the next six months, and referred households lose out on the equivalent dollar value of almost two months of benefits due to the head of household exiting the program. These estimates are local to cases with kindergarten-aged children, a group that is particularly impacted by changes in household resources and nutrition.

We find no evidence of meaningful effects of General Work Requirements or E&T on labor supply among this sample. These results add to the mounting evidence that SNAP Work Requirements decrease program participation and have little effect on labor supply.

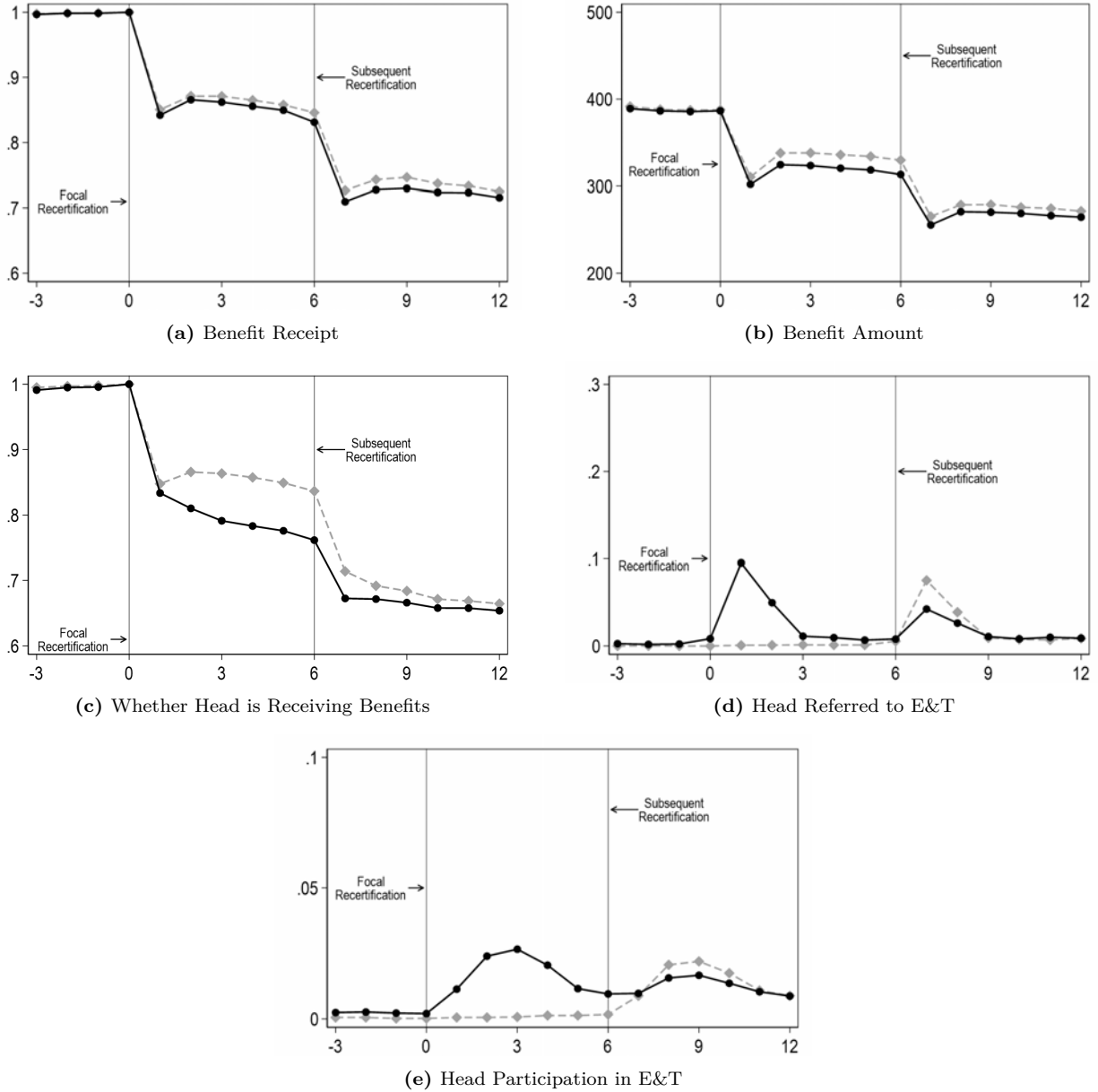
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7 Figures

Figure 1: Raw Means of Benefit Outcomes Surrounding Recertification for those Narrowly Subject to and Exempt from General Work Requirements (Ignoring Age-6 Exemptions)



Months Surrounding Recertification

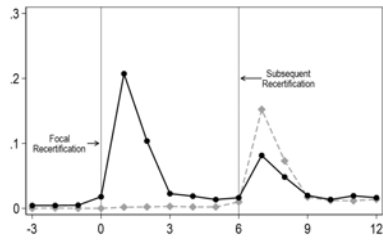


Notes: Figures provide raw means for SNAP cases with children that are within a three-month window of turning 6 at the time of recertification (time period 0). The sample includes all cases where the case would be subject to General Work requirements if the youngest child is over six. We apply the sample restrictions described in Section 3.1.

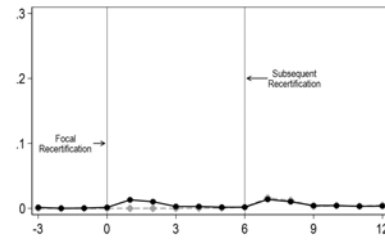
Figure 2: Raw Means of Benefit Outcomes for those who are Subject to General Work Requirements – Broken Out by Whether Case is Additionally Likely Subject to E&T Requirements (Ignoring Age-6 Exemptions)

Subgroup: More Likely Subject to E&T and General WR

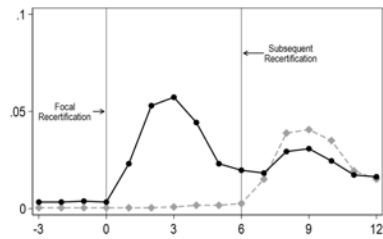
Subgroup: Less Likely Subject from E&T, Subject to General WR



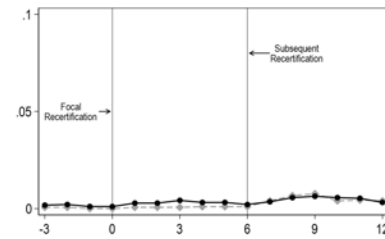
(a) Head Referred to E&T



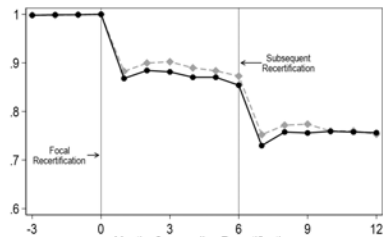
(b) Head Referred to E&T



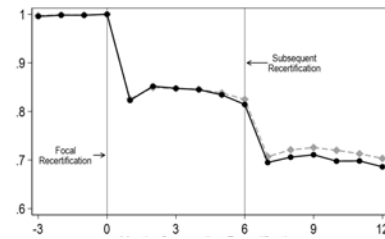
(c) Head Participating in E&T



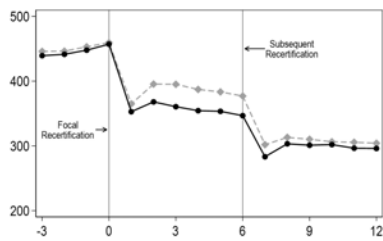
(d) Head Participating in E&T



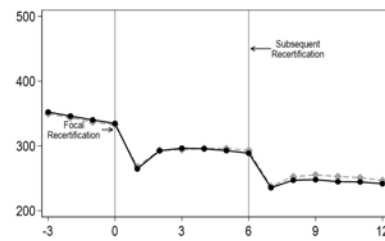
(e) Benefit Receipt



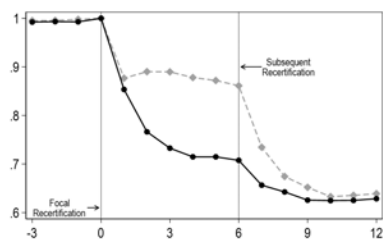
(f) Benefit Receipt



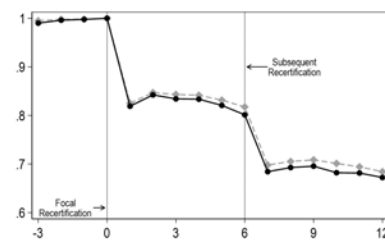
(g) Benefit Amount



(h) Benefit Amount



(i) Whether Head is Receiving Benefits



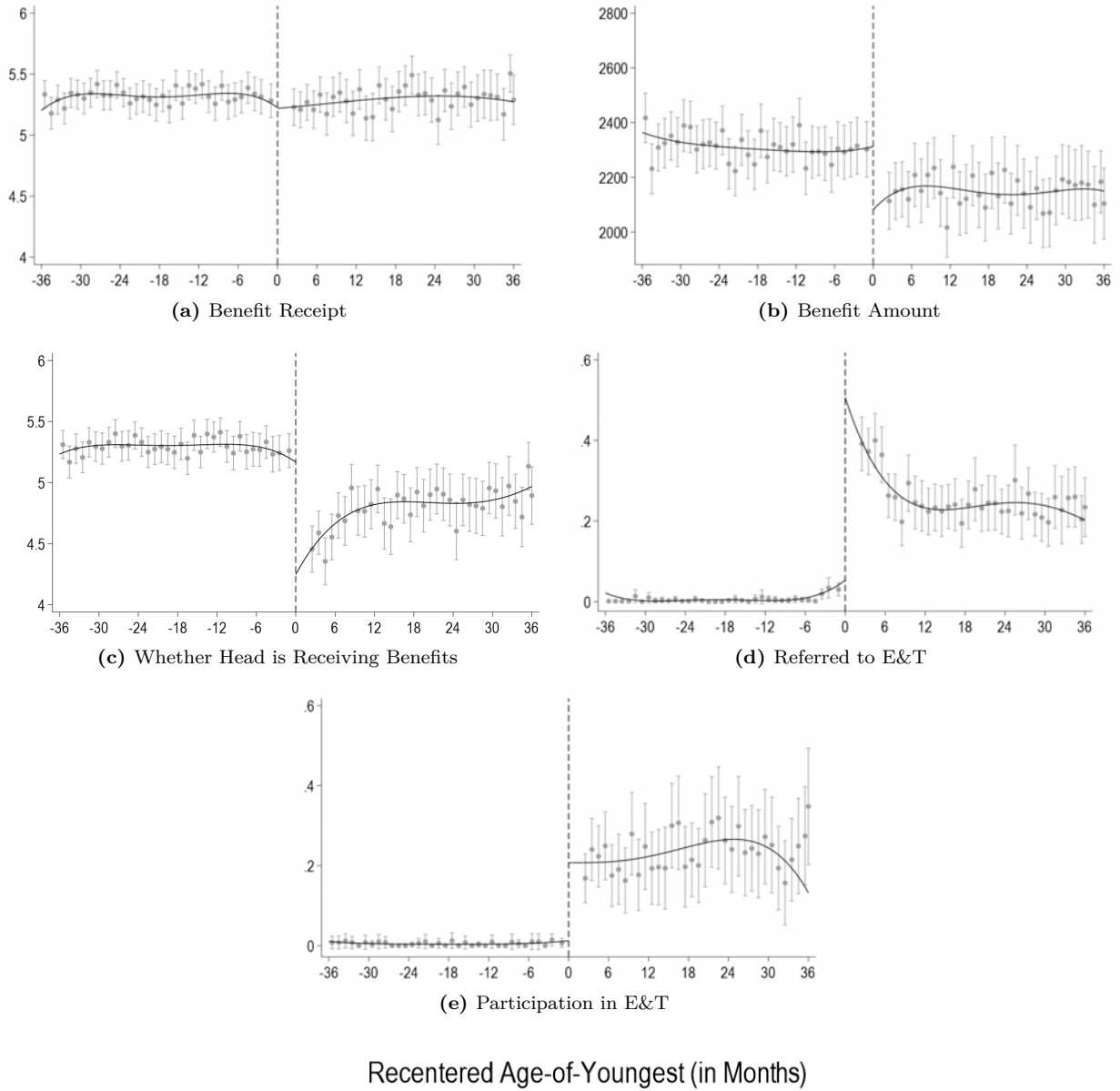
(j) Whether Head is Receiving Benefits

Months Surrounding Recertification



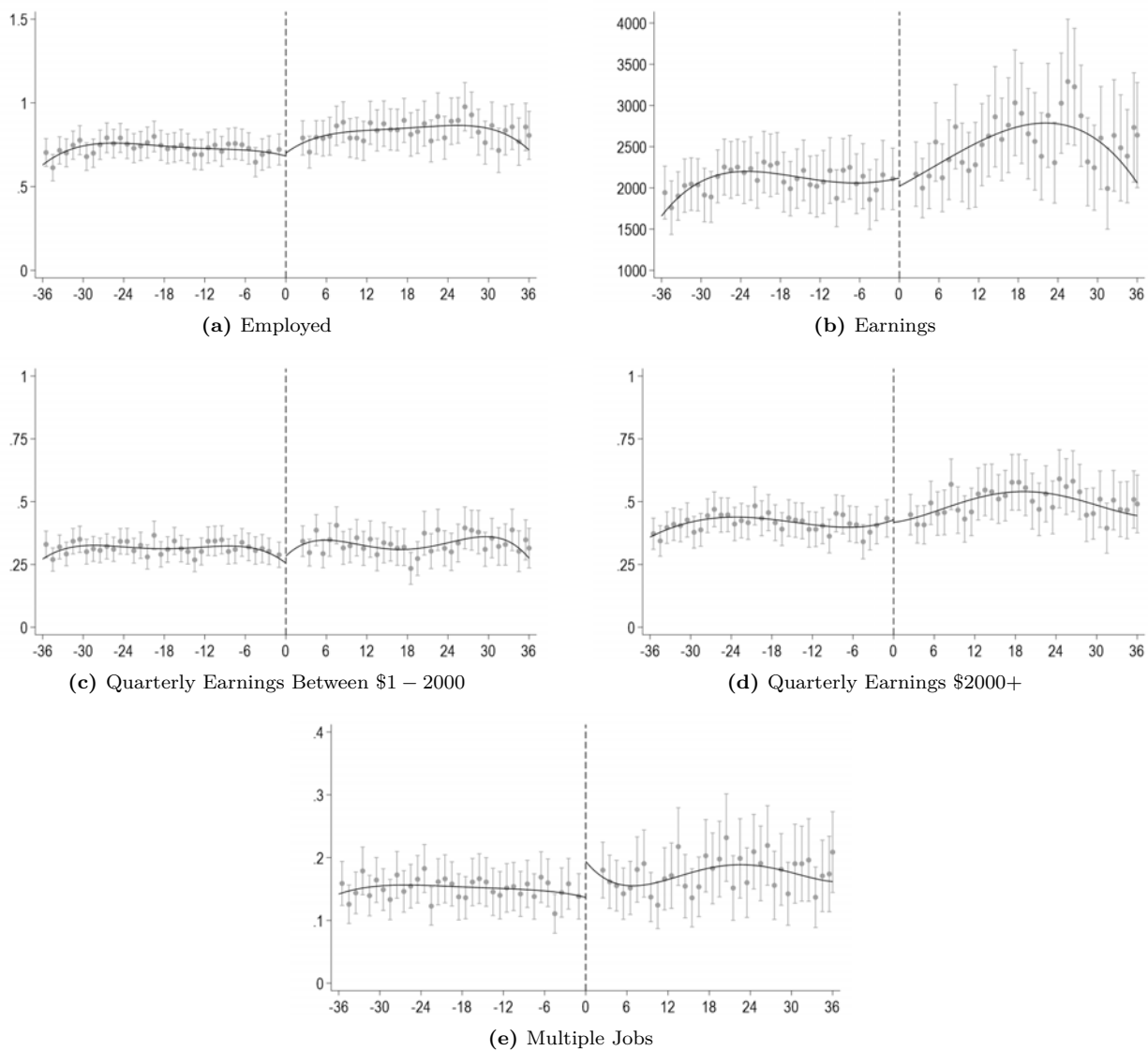
Notes: Figures provide raw means for SNAP cases with children that are within a three-month window of turning 6 at the time of recertification (time period 0). The sample includes all cases where the case would be subject to General Work requirements if the youngest child is over six. We apply the sample restrictions described in Section 3.1. Panels in the left column further restrict to cases that would additionally be likely subject to E&T requirements when their youngest child turns 6. Panels in the right column conversely restrict to cases that are likely exempt from E&T requirements even when their youngest child turns 6.

Figure 3: Effects of General Work Requirements on 6-Month Cumulative Benefit Outcomes – Cases That are Subject to General and E&T Requirements (Ignoring Age-6 Exemptions)



Notes: Figure displays robust regression discontinuity plots (Calonico et al., 2015) for SNAP recipients in which the age of the youngest child in the case is within three years of the age-six cutoff for exemption from the General Work Requirement. The running variable, age-of-youngest child in the case at the time of recertification, has been recentered at age six. To the right of the cutoff, cases are subject to General Work Requirements at recertification and to the left cases are exempt. We apply the sample restrictions described in Section 3.1. We further restrict to cases that would be subject to both General Work Requirements and E&T if the youngest child is over six.

Figure 4: Effects of E&T Work Requirements on 6-Month Cumulative Labor Supply Outcomes – Cases That are Subject to General and E&T Requirements (Ignoring Age-6 Exemptions)



Recentered Age-of-Youngest (in Months)

Notes: Figure displays robust regression discontinuity plots (Calonico et al., 2015) for SNAP recipients in which the age of the youngest child in the case is within three years of the age-six cutoff for exemption from the General work requirement. The running variable, age-of-youngest child in the case at the time of recertification, has been recentered at age six. To the right of the cutoff, cases are subject to General Work Requirements at recertification and to the left cases are exempt. We apply the sample restrictions described in Section 3.1. We further restrict to cases that would be subject to both General Work Requirements and E&T if the youngest child is over six.

8 Tables

Table 1: Estimates of Narrowly being Subject to General Work Requirements Among Those Who Would Be Subject to E&T (Ignoring Age-6 Exemptions)

| a) Benefit Outcomes | Months After Recertification | | | | | | | | | | Cumulative | | | |
|----------------------------------------------|------------------------------|---------|-----------|---------|-----------|---------|-----------|---------|-----------|---------|------------|---------|----------------|---------|
| | 1st Month | | 2nd Month | | 3rd Month | | 4th Month | | 5th Month | | 6th Month | | 6-Month Effect | |
| Referred to E&T [Base Avg.=0.010] | 0.243*** | (0.028) | 0.136*** | (0.026) | 0.003 | (0.013) | 0.018** | (0.009) | 0.010 | (0.007) | -0.005 | (0.012) | 0.415*** | (0.057) |
| Participation in E&T [Base Avg.=0.012] | 0.019*** | (0.007) | 0.054*** | (0.012) | 0.060*** | (0.012) | 0.043*** | (0.011) | 0.013* | (0.007) | 0.006 | (0.007) | 0.197*** | (0.042) |
| Benefit Receipt [Base Avg.=1.000] | -0.001 | (0.029) | -0.005 | (0.030) | -0.033 | (0.029) | -0.015 | (0.028) | -0.002 | (0.030) | -0.021 | (0.024) | -0.079 | (0.138) |
| Benefit Amount [Base Avg.=461] | -27 | (21) | -41*** | (16) | -54*** | (20) | -52*** | (19) | -42*** | (16) | -37** | (18) | -241*** | (86) |
| Head Receiving Benefits [Base Avg.=1.000] | -0.019 | (0.026) | -0.145*** | (0.036) | -0.191*** | (0.034) | -0.199*** | (0.036) | -0.179*** | (0.031) | -0.182*** | (0.031) | -0.958*** | (0.162) |

| b) Labor Supply | Quarters After Recertification | | | | | | | | | | Cumulative |
|---------------------------------------------|--------------------------------|---------|-------------|---------|-------------|---------|-------------|---------|------------------|---------|------------|
| | Quarter of Recert. | | 1st Quarter | | 2nd Quarter | | 3rd Quarter | | 3-Quarter Effect | | |
| Employed [Base Avg.=0.202] | 0.009 | (0.030) | 0.004 | (0.040) | 0.032 | (0.035) | -0.014 | (0.034) | 0.020 | (0.096) | |
| Real Quarterly Earnings [Base Avg.=398] | 9 | (99) | -19 | (106) | -23 | (113) | -35 | (140) | -49 | (301) | |
| Multiple Jobs [Base Avg.=0.048] | 0.018 | (0.025) | -0.009 | (0.019) | 0.013 | (0.015) | 0.056** | (0.026) | 0.044 | (0.038) | |
| Qrt. Earnings 1 – 2000 [Base Avg.=0.123] | 0.008 | (0.022) | -0.002 | (0.032) | 0.078*** | (0.032) | -0.040 | (0.034) | 0.052 | (0.073) | |
| Qrt. Earnings 2000+ [Base Avg.=0.078] | 0.001 | (0.018) | 0.013 | (0.023) | -0.021 | (0.026) | 0.019 | (0.034) | -0.008 | (0.064) | |

Notes: $N = 35,476$. Table provides robust regression discontinuity estimates (Calonico et al., 2015) for SNAP recipients where the age of the youngest child in the case is within three years of the age-six cutoff for exemption from the General work requirement. The running variable, age-of-youngest child in the case at the time of recertification, has been recentered on age six. We apply the sample restrictions described in Section 3.1. We further restrict to cases that would be subject to both General Work requirements and E&T requirements if the youngest child is over six. The instrument is whether the head of the case is referred to E&T in the month following the focal recertification. * $p < 0.10$, ** $p < 0.05$, *** $p < 0.01$

A Appendix Figures

Figure A1: Example of SNAP Work Requirement Mailer

Dear **SNAP Work Requirement**

You Must Follow These Requirements to Receive SNAP Benefits

This letter is to tell you that you must meet general work requirements to receive Supplemental Nutrition Assistance Program (SNAP) benefits. **If you do not, your households SNAP benefits may decrease or end.** Different people in your household may need to follow different work requirements. This letter tells each of you what you need to do.

What do you need to do?

| REQUIREMENT TYPE | APPLIES TO |
|---------------------------|------------|
| General Work Requirements | |

General Work Requirements

What do you need to do?

You **must** follow these **General Work Requirements** to keep your SNAP benefits:

- Accept any job offer you receive, unless there is a good reason you can't.
- If you have a job, don't quit your job or choose to work less than 30 hours each week without having a good reason, such as getting sick, being discriminated against, or not getting paid.
- Tell us about your job and how much you are working, if asked.

Does everyone need to follow these work requirements?

No, only certain people do. You **may not** have to follow these requirements if you are:

- Younger than age 16, or age 60 or older,
- Taking care of a child younger than age 6 or someone who needs helps caring for themselves,
- Already working at least 30 hours a week,
- Already earning \$217.50 or more per week,
- Receiving unemployment benefits, or you applied for unemployment benefits,
- Not working because of a physical or mental health reason,
- Going to school, college, or training program at least half time,
- Meeting the work rules for Temporary Assistance for Needy Families (TANF), or
- Participating in a drug or alcohol addiction treatment program.

What happens if you do not follow these General Work Requirements?

You may lose your SNAP benefits if you don't follow these work requirements and you don't have a good reason.

How long will you lose SNAP benefits if you don't follow these General Work Requirements?

- The first time you don't follow these requirements, and you don't have a good reason, you can't get SNAP benefits for **1 month**.
- The second time you don't follow these requirements, you can't get SNAP benefits for **3 months**.
- The third time, you can't get SNAP benefits for **6 months**.
- And you must follow these work requirements before you can get SNAP benefits again.

Notes: This Figure includes an example of the mailer that is automatically sent to SNAP recipients who are subject to General Work Requirements in the Mountain-Plains state we study.

Figure A2: Typical General Work Requirement and E&T Timeline Surrounding Focal Recertification

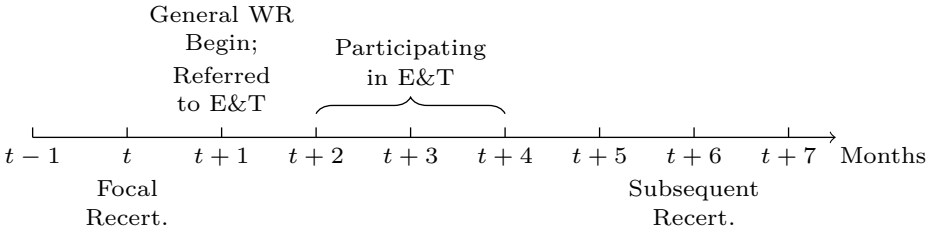


Figure A3: Example of SNAP E&T Work Requirement Mailer

SNAP Employment and Training Requirements

This program can make it easier for you to find or keep a job.

You **must** follow these Requirements to keep your SNAP benefits:

- Register for work online at jobs.utah.gov.
- Complete the online Job Search Skill Evaluation.
- Attend a virtual SNAP E&T Workshop. You will receive another letter with your appointment date and time.
- Meet with your assigned Employment Counselor each month.
- Complete the required workshops.
- Complete 48 job contacts.

Does everyone need to follow these Employment and Training Requirements?

No, only certain people do. You **may not** have to follow these requirements if you:

- Are between the ages of 47 and 60.
- Are currently employed.
- Are temporarily laid off from your work.
- Physically or mentally unfit for employment.
- Are a recipient of the Family Employment Program.
- Live more than 35 miles from a job search and training center.
- Do not have access to public or private transportation to work.
- Are responsible for the care of an incapacitated person.
- Are Responsible for the care of a dependent under the age of six.
- Are receiving or has applied for unemployment benefits.
- Participate regularly in a drug or alcohol treatment program other than AA.
- Are a student enrolled at least half time in any school or training program.
- Are a domestic violence survivor.
- Are on probation or parole.
- Have limited English speaking skills.
- Have applied for Supplemental Security Income (SSI).
- Are pregnant.
- Are homeless.
- Are participating with a Vocational Rehabilitation program.
- Are participating in a Title V program, such as Older American Programs, Easter Seals, and the Forestry Program.
- Are a Refugee Cash Assistance participants.
- Lacking child care.
- Are not an appropriate fit for Employment and Training program as determined by a manager.
- Are low functioning or have developmental disabilities?
- Lack public and/or private transportation.
- Are participating in Choose to Work, Americorps, and Americorps VISTA program.

Call us at [REDACTED] as soon as possible if you think one of these might describe you. If we find that it does, you will not need to follow the Employment and Training Requirements.

What if you have costs from doing the program?

You may be eligible to receive a \$50 reimbursement for each month that you complete the required Employment and Training activities. This reimbursement is intended to refund you for costs such as transportation, child care, personal equipment, etc. You may be eligible to receive up to three months of these reimbursements. Your participation will be verified before we pay you. You will not receive all three reimbursements if you do not participate each month.

If your cost is greater than \$50 per month to participate in the required Employment and Training activities, you may not be required to participate. If your cost to participate is greater than \$50 per month, please call us at [REDACTED] as soon as possible.

What happens if you do not follow these Employment and Training Requirements?

If you do not follow these requirements without a good reason, **you may lose your SNAP benefits.**

What if you have a good reason for not following these Employment and Training Requirements?

Call us at [REDACTED] as soon as possible if you think you have a good reason, or your program is not a good fit for you. You should also tell your employment counselor or eligibility worker. Good reasons for not following these requirements include issues you can't control such as getting sick or not having childcare for a child younger than age 12.

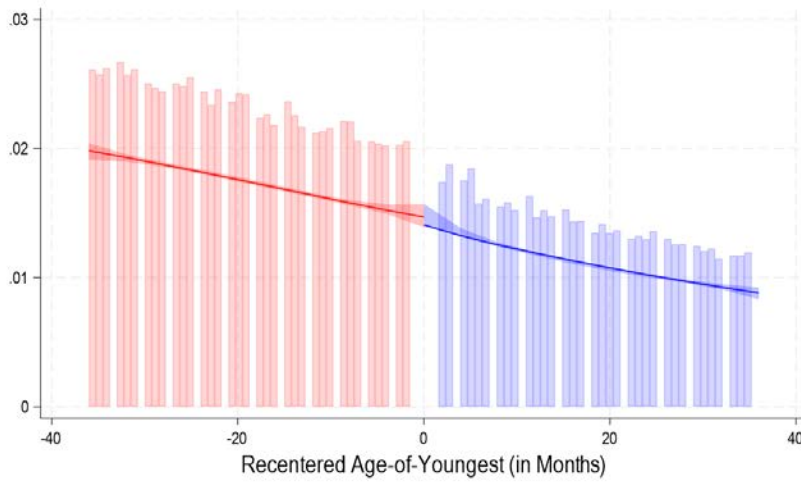
If we find that you have a good reason from not following the Employment and Training requirements, there will be no change to your SNAP benefits.

How long will you lose SNAP benefits if you don't follow these Employment and Training Requirements?

- The first time you do not follow these requirements and you don't have a good reason, you can't get SNAP benefits for **1 month**.
- The second time you do not follow these requirements, you can't get SNAP benefits for **3 months**.
- The third time, you can't get SNAP benefits for **6 months**.

Notes: This Figure includes an example of the mailer that is automatically sent to SNAP recipients who are subject to Employment and Training Requirements in the Mountain-Plains state we study.

Figure A4: Densities Surrounding Cutoff for Households Who are Otherwise Subject to General Work Requirements



Notes: RD manipulation tests from (Cattaneo et al., 2018). See Section 4 for details on the sample selection.

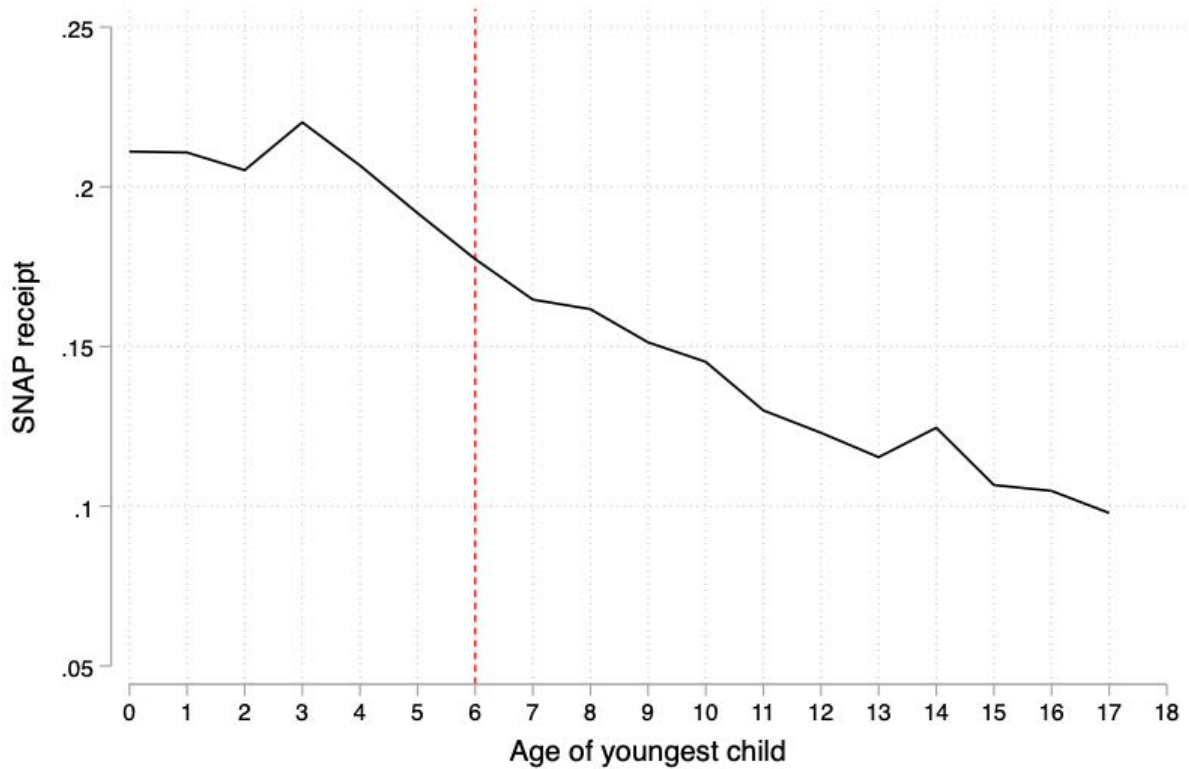
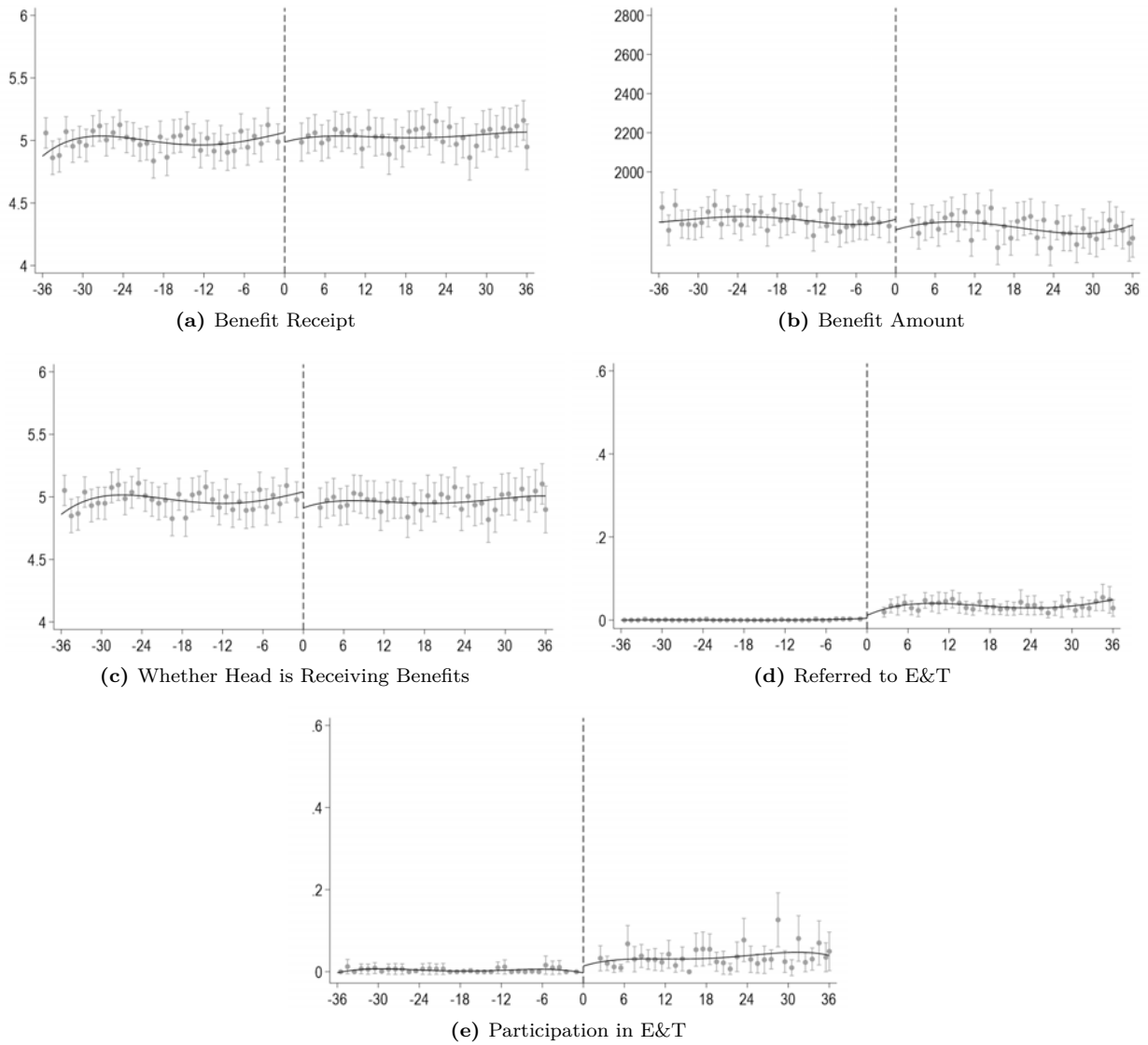


Figure A5: SNAP Receipt by Age of Youngest Child

Notes: Data includes CPS data from 2011-2019. Includes household heads and households with children under the age of 18. Results are weighted using survey weights.

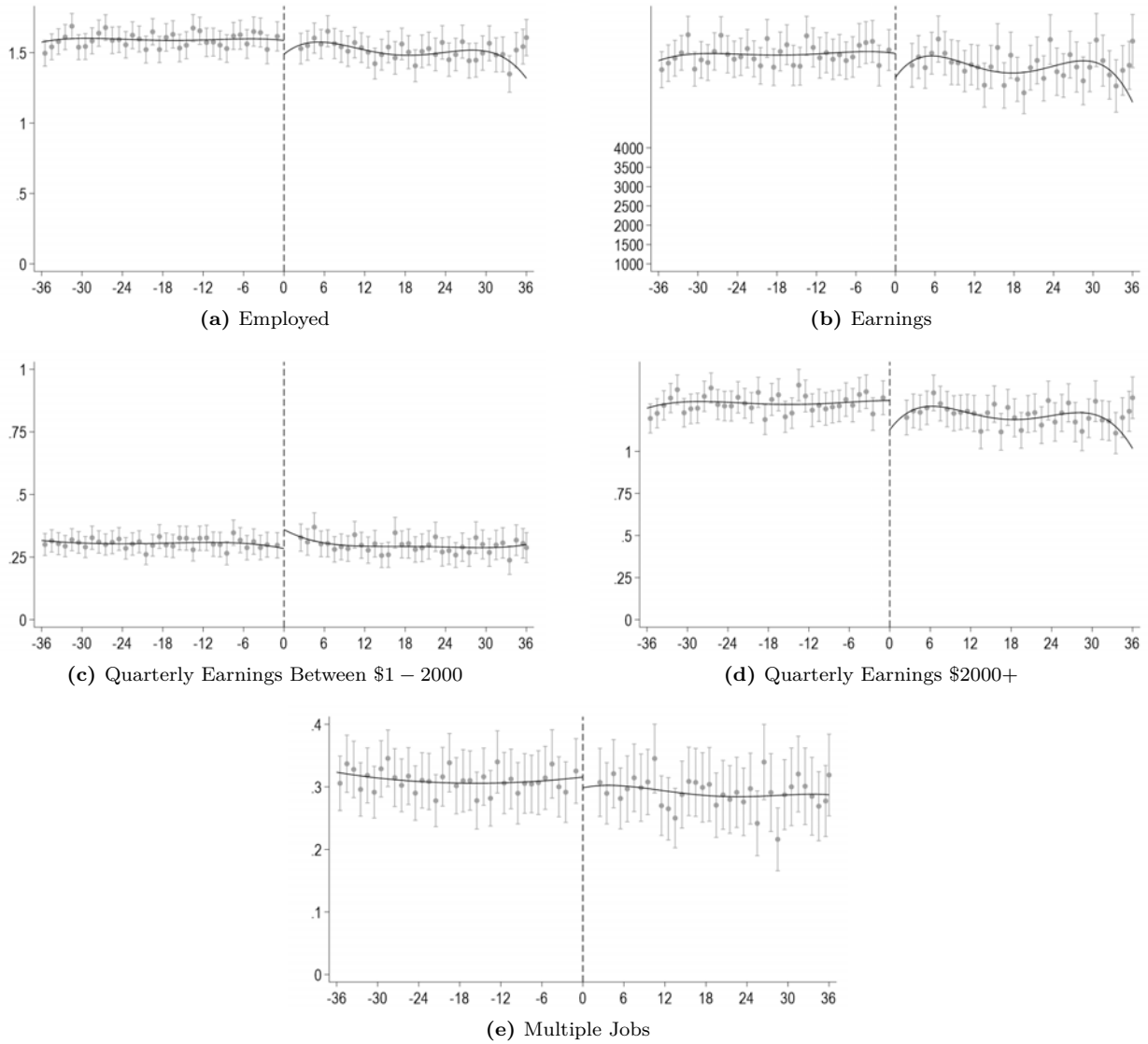
Figure A6: 6-Month Cumulative Benefit Outcomes – Cases That are Subject to General, but Exempt from E&T Requirements



Recentered Age-of-Youngest (in Months)

Notes: Figure displays robust regression discontinuity plots (Calonico et al., 2015) for SNAP recipients in which the age of the youngest child in the case is within three-months of the age-six cutoff for exemption from the General work requirement. The running variable, age-of-youngest child in the case at the time of recertification, has been recentered at age six. To the right of the cutoff, cases are subject to General work requirements at recertification and to the left cases are exempt. We apply the sample restrictions described in Section 3.1. We further restrict to cases that would be subject to both General Work requirements and E&T requirements if the youngest child is over six.

Figure A7: 6-Month Cumulative Labor Supply Outcomes – Cases That are Subject to General Work Requirements, but Exempt from E&T Requirements



Recentered Age-of-Youngest (in Months)

Notes: Figure displays robust regression discontinuity plots (Calonico et al., 2015) for SNAP recipients in which the age of the youngest child in the case is within three-months of the age-six cutoff for exemption from the General work requirement. The running variable, age-of-youngest child in the case at the time of recertification, has been recentered at age six. To the right of the cutoff, cases are subject to General work requirements at recertification and to the left cases are exempt. We apply the sample restrictions described in Section 3.1. We further restrict to cases that would be subject to both General Work requirements and E&T requirements if the youngest child is over six.

B Appendix Tables

Table A1: Summary Statistics

| | All SNAP Recertifications (QC Data) | | Mountain Plains Administrative Data | | | | |
|--------------------|----------------------------------------|-----------|-------------------------------------|------------------------------|----------------------------------------------|---------------------------------------------|----------------------------------------------|
| | National | Our State | All Recertifications | General Work Requirements | Analysis Sample | | |
| | | | | | General Work & Around Age-6 (Figure 1) | E&T Sample (Table 1, and Figures 3-4) | E&T Sample and Around Age-6 (Figure 2) |
| Age | 36.972 | 35.980 | 32.302 | 32.395 | 32.805 | 31.698 | 32.195 |
| Female | 0.761 | 0.794 | 0.923 | 0.919 | 0.912 | 0.908 | 0.901 |
| White | 0.334 | 0.727 | 0.652 | 0.647 | 0.656 | 0.653 | 0.661 |
| Black | 0.307 | 0.030 | 0.026 | 0.025 | 0.026 | 0.024 | 0.022 |
| Hispanic | - | - | 0.148 | 0.154 | 0.147 | 0.135 | 0.130 |
| Pacific Islander | 0.003 | 0.009 | 0.011 | 0.011 | 0.011 | 0.010 | 0.009 |
| Asian | 0.010 | 0.007 | 0.010 | 0.010 | 0.011 | 0.009 | 0.010 |
| Native American | 0.012 | 0.023 | 0.036 | 0.038 | 0.039 | 0.045 | 0.047 |
| Household Size | 2.323 | 2.643 | 3.332 | 3.340 | 3.332 | 3.211 | 3.201 |
| # Kids | 1.288 | 1.627 | 2.332 | 2.340 | 2.332 | 2.211 | 2.201 |
| Real 6-month Wages | 1064.518 | 1193.924 | 1276.471 | 1349.516 | 1310.298 | 351.251 | 311.093 |
| Employed | 0.343 | 0.376 | 0.389 | 0.403 | 0.393 | 0.186 | 0.177 |

Notes: The first two columns use data from the SNAP Quality Control Data Set for years 2011-2018. Columns (3)-(6) present summary statistics from the mountain plains state using our administrative data. Columns (5)-(6) are for only those in our main analysis sample. We present the demographics of recertifications only from both data sets. Around age-6 includes those likely subject to General work requirements whose youngest child is within 3 years of the age-6 cutoff. Column (5) includes those who are likely subject to both General work requirements and E&T requirements. For pre-application labor supply information, we use 1 quarter *before* application in our data, and quarterly wage information during all periods of SNAP receipt in the Quality Control data and for all recipients in our data. In the Quality Control data, and the mountain-plains data that is not our analysis sample, we use only the head of household. We use the weights provided by the Quality Control data. Statistics are for 2011-2018.

Table A2: Baseline Characteristics Do Not Correlate with Narrowly Being Subject to Work Requirements

| | General-WR Sample | E&T-WR Sample |
|---------------------|--------------------|---------------------|
| Hispanic | 0.004 (0.011) | -0.010 (0.019) |
| Black | -0.009 (0.025) | -0.026 (0.047) |
| Native American | 0.014 (0.020) | -0.013 (0.030) |
| White | 0.011 (0.009) | 0.008 (0.014) |
| Pacific Islander | 0.018 (0.033) | -0.088 (0.062) |
| Female | -0.026* (0.014) | -0.052** (0.022) |
| Number in HH | -0.002 (0.004) | -0.008 (0.009) |
| SNAP Issued Amount | -0.000 (0.000) | 0.000 (0.000) |
| Baseline Employment | -0.007 (0.015) | -0.039 (0.027) |
| Baseline Earnings | -0.000 (0.000) | 0.000 (0.000) |
| F | 0.77 | 1.36 |
| N | 10,211 | 4,389 |

Notes: This table regresses whether the youngest child in the case is above the age of 6 onto the pre-recertification characteristics of the head of household for case-recertification combinations who would be subject to either General Work Requirements broadly (column 1) or General and E&T requirements (column 2)—ignoring youngest-child-age exemptions. The sample is restricted to case-recertification combinations between 2011 and 2019, to cases with a single adult where the head of the case is receiving benefits at baseline, we can observe age-in-months for all children on the case, and we can observe E&T exemption information for the head. We further restrict the sample to only include all cases-recertification combinations where the youngest child is within 5 months of turning six. * p<0.10, ** p<0.05, *** p<0.01

Table A3: Estimates of Narrowly being Subject to General Work Requirements Among Those Who Would Be Exempt From E&T (Ignoring Age-6 Exemptions)

| a) Benefit Outcomes | Months After Recertification | | | | | | | | | | | Cumulative | | |
|----------------------------------------------|------------------------------|---------|-----------|---------|-----------|---------|-----------|---------|-----------|---------|-----------|------------|----------------|---------|
| | 1st Month | | 2nd Month | | 3rd Month | | 4th Month | | 5th Month | | 6th Month | | 6-Month Effect | |
| Referred to E&T [Base Avg.=0.001] | 0.011** | (0.005) | | () | -0.001 | (0.003) | 0.000 | (0.002) | -0.002 | (0.002) | -0.004** | (0.002) | 0.013 | (0.010) |
| Participation in E&T [Base Avg.=0.002] | 0.005* | (0.003) | 0.004 | (0.004) | 0.007** | (0.003) | 0.005 | (0.004) | 0.005 | (0.005) | 0.003 | (0.004) | 0.029 | (0.023) |
| Benefit Receipt [Base Avg.=1.000] | -0.014 | (0.025) | -0.014 | (0.022) | -0.015 | (0.023) | -0.012 | (0.026) | -0.017 | (0.024) | -0.030 | (0.023) | -0.098 | (0.126) |
| Benefit Amount [Base Avg.=333] | -13 | (15) | -11 | (13) | -3 | (13) | -5 | (12) | -5 | (13) | -9 | (14) | -57 | (65) |
| Head Receiving Benefits [Base Avg.=1.000] | -0.018 | (0.025) | -0.028 | (0.024) | -0.029 | (0.023) | -0.017 | (0.025) | -0.030 | (0.026) | -0.033 | (0.023) | -0.166 | (0.128) |

| b) Labor Supply | Quarters After Recertification | | | | | | | | Cumulative | |
|-----------------------------------------------|--------------------------------|---------|-------------|---------|-------------|---------|-------------|---------|------------------|---------|
| | Quarter of Recert. | | 1st Quarter | | 2nd Quarter | | 3rd Quarter | | 3-Quarter Effect | |
| Employed [Base Avg.=0.553] | -0.019 | (0.038) | -0.029 | (0.044) | -0.074 | (0.054) | -0.062 | (0.045) | -0.172 | (0.141) |
| Real Quarterly Earnings [Base Avg.=2, 130] | -162 | (189) | -4 | (233) | -294 | (244) | -273 | (258) | -675 | (700) |
| Multiple Jobs [Base Avg.=0.107] | 0.000 | (0.021) | -0.013 | (0.019) | -0.003 | (0.017) | -0.007 | (0.022) | -0.018 | (0.036) |
| Qrt. Earnings 1 – 2000 [Base Avg.=0.102] | 0.006 | (0.022) | 0.034 | (0.023) | 0.010 | (0.017) | 0.024 | (0.016) | 0.062 | (0.041) |
| Qrt. Earnings 2000+ [Base Avg.=0.451] | -0.024 | (0.041) | -0.053 | (0.055) | -0.071 | (0.047) | -0.055 | (0.044) | -0.190 | (0.142) |

Notes: $N = 51,387$. Table provides robust regression discontinuity estimates (Calonico et al., 2015) for SNAP recipients where the age of the youngest child in the case is within three years of the age-six cutoff for exemption from the General work requirement. The running variable, age-of-youngest child in the case at the time of recertification, has been recentered on age six. We apply the sample restrictions described in Section 3.1. We further restrict to cases that would be subject to both General Work requirements and E&T requirements if the youngest child is over six. The instrument is whether the head of the case is referred to E&T in the month following the focal recertification. * $p < 0.10$, ** $p < 0.05$, *** $p < 0.01$

Table A4: Estimates of Narrowly being Subject to General Work Requirements Among Those Who Would Be Subject to E&T (Ignoring Age-6 Exemptions)–Subgroups

| | Months After Recertification | | | | | | | | | | Cumulative | |
|---------------------------------|------------------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|--|--|--|------------|--|
| | 1st Month | 2nd Month | 3rd Month | 4th Month | 5th Month | 6th Month | 6-Month Effect | | | | | |
| Referred to E&T | | | | | | | | | | | | |
| Above-Med. Per-Cap. Ben. | 0.251*** (0.050) | 0.167*** (0.051) | 0.019 (0.027) | 0.011 (0.019) | 0.007 (0.010) | -0.012 (0.017) | 0.457*** (0.135) | | | | | |
| Below-Med. Per-Cap. Ben. | 0.260*** (0.030) | 0.123*** (0.021) | -0.012 (0.019) | 0.020*** (0.008) | 0.014 (0.012) | -0.005 (0.014) | 0.410*** (0.056) | | | | | |
| Participation in E&T | | | | | | | | | | | | |
| Above-Med. Per-Cap. Ben. | 0.015 (0.012) | 0.033** (0.017) | 0.030** (0.015) | 0.027 (0.018) | 0.020 (0.016) | 0.011 (0.015) | 0.144** (0.071) | | | | | |
| Below-Med. Per-Cap. Ben. | 0.021*** (0.009) | 0.064*** (0.018) | 0.077*** (0.016) | 0.035** (0.017) | -0.003 (0.014) | -0.001 (0.013) | 0.182*** (0.072) | | | | | |
| Benefit Receipt | | | | | | | | | | | | |
| Above-Med. Per-Cap. Ben. | -0.029 (0.047) | -0.027 (0.043) | -0.074* (0.040) | -0.067 (0.052) | -0.033 (0.046) | -0.013 (0.050) | -0.250 (0.249) | | | | | |
| Below-Med. Per-Cap. Ben. | 0.009 (0.035) | 0.004 (0.036) | -0.006 (0.035) | 0.010 (0.034) | 0.031 (0.035) | -0.010 (0.029) | -0.017 (0.161) | | | | | |
| Benefit Amount | | | | | | | | | | | | |
| Above-Med. Per-Cap. Ben. | -36 (23) | -40 (31) | -94*** (36) | -98*** (38) | -85** (39) | -67* (40) | -423** (197) | | | | | |
| Below-Med. Per-Cap. Ben. | -29 (31) | -29 (18) | -35* (19) | -29 (18) | -40 (26) | -33* (20) | -195* (112) | | | | | |
| Head Receiving Benefits | | | | | | | | | | | | |
| Above-Med. Per-Cap. Ben. | -0.053 (0.051) | -0.153*** (0.050) | -0.258*** (0.058) | -0.240*** (0.070) | -0.219*** (0.058) | -0.178*** (0.066) | -1.094*** (0.312) | | | | | |
| Below-Med. Per-Cap. Ben. | -0.005 (0.033) | -0.144*** (0.043) | -0.176*** (0.038) | -0.186*** (0.039) | -0.164*** (0.042) | -0.194*** (0.035) | -0.897*** (0.171) | | | | | |

Notes: Table provides robust regression discontinuity estimates (Calonico et al., 2015) for SNAP recipients where the age of the youngest child in the case is within three years of the age-six cutoff for exemption from the General work requirement. The running variable, age-of-youngest child in the case at the time of recertification, has been recentered on age six. We apply the sample restrictions described in Section 3.1. We further restrict to cases that would be subject to both General Work requirements and E&T requirements if the youngest child is over six. The instrument is whether the head of the case is referred to E&T in the month following the focal recertification. * p<0.10, ** p<0.05, *** p<0.01

Table A5: Estimates of Narrowly being Subject to General Work Requirements Among Those Who Would Be Subject to E&T (Ignoring Age-6 Exemptions)–Subgroups

| | Quarters After Recertification | | | | | | | | | Cumulative | |
|--------------------------------|--------------------------------|-------------|-------------|-------------|------------------|---------|----------|---------|--------|------------|--|
| | Quarter of Recert. | 1st Quarter | 2nd Quarter | 3rd Quarter | 3-Quarter Effect | | | | | | |
| Employed | | | | | | | | | | | |
| Above-Med. Per-Cap. Ben. | -0.026 | (0.065) | -0.105 | (0.077) | -0.029 | (0.075) | -0.056 | (0.066) | -0.196 | (0.182) | |
| Below-Med. Per-Cap. Ben. | 0.046 | (0.035) | 0.021 | (0.039) | 0.106* | (0.054) | -0.009 | (0.047) | 0.068 | (0.110) | |
| Real Quarterly Earnings | | | | | | | | | | | |
| Above-Med. Per-Cap. Ben. | -109 | (180) | -319 | (268) | -554** | (274) | -17 | (236) | -713 | (712) | |
| Below-Med. Per-Cap. Ben. | -1 | (138) | 55 | (144) | 25 | (181) | 47 | (209) | 82 | (496) | |
| Multiple Jobs | | | | | | | | | | | |
| Above-Med. Per-Cap. Ben. | 0.010 | (0.030) | -0.035 | (0.029) | 0.001 | (0.028) | 0.115*** | (0.046) | 0.048 | (0.051) | |
| Below-Med. Per-Cap. Ben. | 0.012 | (0.027) | 0.012 | (0.021) | 0.031 | (0.024) | 0.018 | (0.026) | 0.044 | (0.051) | |
| Qrt. Earnings 1 – 2000 | | | | | | | | | | | |
| Above-Med. Per-Cap. Ben. | -0.011 | (0.050) | -0.072 | (0.052) | 0.046 | (0.052) | -0.011 | (0.043) | -0.048 | (0.108) | |
| Below-Med. Per-Cap. Ben. | 0.019 | (0.031) | 0.016 | (0.035) | 0.088*** | (0.035) | -0.020 | (0.038) | 0.114 | (0.082) | |
| Qrt. Earnings 2000+ | | | | | | | | | | | |
| Above-Med. Per-Cap. Ben. | -0.010 | (0.038) | -0.013 | (0.046) | -0.104* | (0.059) | -0.023 | (0.047) | -0.113 | (0.137) | |
| Below-Med. Per-Cap. Ben. | 0.007 | (0.028) | 0.018 | (0.030) | -0.004 | (0.041) | 0.068 | (0.050) | 0.066 | (0.109) | |

Notes: Table provides robust regression discontinuity estimates (Calonico et al., 2015) for SNAP recipients where the age of the youngest child in the case is within three years of the age-six cutoff for exemption from the General work requirement. The running variable, age-of-youngest child in the case at the time of recertification, has been recentered on age six. We apply the sample restrictions described in Section 3.1. We further restrict to cases that would be subject to both General Work requirements and E&T requirements if the youngest child is over six. The instrument is whether the head of the case is referred to E&T in the month following the focal recertification. * p<0.10, ** p<0.05, *** p<0.01