

Appendix R-6-B Public Comment 6 Attachment



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Mr. Michael Burke
Social Science Research Analyst
Food and Nutrition Service
3101 Park Center Drive
Room 1014
Alexandria, VA 22302

Re: Agency Information Collection Activities: Proposed Collection; Comments
Request—Survey of SNAP and Work, OMB Number 0584

Dear Mr. Burke:

I am writing to provide comments on USDA's Proposed Information Collection for the Survey of Supplemental Nutrition Assistance Program (SNAP) and Work. This study will collect information about the characteristics of SNAP participants and their employment histories at the national and state level. This collection may produce information that is valuable for researchers and SNAP administrators to better understand employment characteristics of participants. There are several areas, however, where the study may be subject to bias and mismeasurement if the researchers do not adequately account for these sources of error. For example, the study collection may overrepresent long-term SNAP participants and under-estimate employment among participants, which would detract from the study's objectives to provide a fuller picture of SNAP and employment. In other areas, presenting relevant context is imperative to ensure that the study has relevant policy applications. For example, presenting information about employment among SNAP participants without discussing significant factors contributing to employment patterns, such as job quality or access to jobs, would limit the usefulness of the study or its policy applications. The information collection notice did not provide detail, and it is possible many of these potential sources of error are already addressed in the study design, but if not, I recommend the study authors explore methods to lessen these biases or at least properly document them so that readers will be able to better contextualize the information. Most of my comments address ways to increase the accuracy and utility of the study:

- The information collection notice does not address how it will address some potential sources of bias and error, such as the over-representation of long-term SNAP participants and difficulties capturing accurate retrospective work histories. I strongly recommend the study authors use tools to measure more complete and accurate dynamics of both work and SNAP participation and address these biases, which would provide a more useful

understanding of employment patterns among SNAP participants and the role SNAP plays in supplementing the income of these individuals with varying employment statuses.

- Given that work patterns among SNAP participants reflect broader trends in the labor market, incorporating research about external factors affecting SNAP participants' labor market decisions, such as information on labor market metrics and job quality, would also provide needed context to understand the underlying factors contributing to participants' labor force characteristics and potential policy implications of these trends. In addition, including survey data that analyzes trends among non-participants may also provide valuable information, though the study would need to carefully adjust for self-selection bias.
- Other sources of data such as Census surveys could supplement the study and help address shortcomings. Including survey questions about potential relevant topics such as barriers to obtaining SNAP among workers may help ensure that the information collected is useful to the Agency's operations.

The Center on Budget and Policy Priorities is a nonpartisan research and policy institute. We pursue federal and state policies designed both to reduce poverty and inequality and to restore fiscal responsibility in equitable and effective ways. We apply our deep expertise in programs and policies that help low-income people in order to help inform debates and achieve better policy outcomes. We work to protect and strengthen programs that reduce poverty and inequality and increase opportunity for people trying to gain a foothold on the economic ladder. Our work on federal nutrition programs, including SNAP, is a core component of our organization's work. Our food assistance analyst team includes nine people, including eight analysts and researchers who work on SNAP policy and operations.

Mitigating Bias Towards Long-Term SNAP Participants Would Increase Utility of Study

The proposed study may over-represent long-term SNAP participants, which could limit the accuracy and utility of the study. The information collection describes a study that samples SNAP participants ages 18 through 69 who "received SNAP benefits in a specific sampling month". According to the collection notice, this study will "provide information on employment status, length of workforce detachment, types of job held, education and training, and social, physical, and environmental barriers to work". The collection does not address how the survey, which will query people participating in SNAP in a specific month, will adjust for the bias of oversampling long-term participants in any given month. Without a careful approach to address this issue, the survey would overstate participation length and misrepresent the characteristics of SNAP participants, which could limit the policy applications of the study. Using methods such as sampling participants over a longer timeframe (such as any individual who has participated at any point within a year rather than participants of a single month) or sampling participants at the beginning of a SNAP spell, or supplementing the analysis with longitudinal or administrative data from other sources are potential options to produce a more useful study.

SNAP participants have varied participation lengths and frequencies. While some participants have more stable circumstances such as stable income and household size and receive SNAP for long interrupted periods of time, others may have more volatile circumstances such as income fluctuating above and below the eligibility limits and participate in SNAP for shorter periods, or may lose SNAP

due to administrative glitches or other procedural reasons. Some participants may only participate once, but many participate multiple times when necessary. Some individuals who are subject to SNAP's three-month time limit have short spells because of this policy.

A survey that only samples people who are participating in a specific month will over-represent longer-term participants because they participate a greater share of months and are therefore more likely to be captured in any given month. The box below ("Illustrative Example: Capturing SNAP Participation Spells") uses a hypothetical example to illustrate this concept. This bias towards capturing long-term participants in any month snapshot is well-documented and sometimes referred to as "length-based sampling".¹

¹Erick Scherpf, *et al*, "Participation in USDA's Supplemental Nutrition Assistance Program (SNAP): Effect of Local Labor Market Conditions in Oregon," Economic Research Service Research Report Number 257, September 2018, <https://www.ers.usda.gov/webdocs/publications/90038/err-257.pdf?v=4809.6>.

Illustrative Example: Capturing SNAP Participation Spells

A survey that only samples people who are participating in a specific month will over-represent longer-term participants because they are more likely to be captured in any given month.

To explain how sampling in any specific month will be biased towards longer-term participants, I have constructed an illustrative scenario. The table below has ten people listed in the column on the left with each month in an illustrative year shown by the monthly columns. All of these people have received SNAP at some point during this year, which we can refer to as “annual” or “ever in the year” participants. Monthly participation is indicated by shading in that month. Every month, there are five SNAP participants. For example, looking down the January column, Joe, Jay, Jan, Jen, and Jin are all January participants, as indicated by that shading.

Table 1. Illustrative example of SNAP caseload dynamics. (Shaded months indicate SNAP participation that month.)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Joe												
Jay												
Jan												
Jill												
Jed												
Jen												
Jon												
Jeb												
Jin												
Joy												

As this table shows, even if the number of participants stays the same each month, the composition changes, as some participants enter and others exit.

Two of these ten participants are long-term SNAP participants (Joe and Jay) who received SNAP for all 12 months in this study, as indicated by the shading in each month. In other words, of the ten annual SNAP participants, 80 percent participate for less than a year, all but Joe and Jay.

In any snapshot of a single month, however, only three of the five, or 60 percent, will appear to be short-term stayers. For example, in January, Joe and Jay are the long-term participants, and Jan, Jen, and Jin participate for less than a year. While long-term stayers represent only 20 percent of the total group of participants who received SNAP ever in a year, they represent 40 percent of those participants sampled in any given month.

The sampling timeframe can drastically change the estimates of SNAP participation lengths. For example, a USDA analysis of longitudinal data from the Survey of Income and Program Participation (SIPP) found that among participants who entered SNAP in a period between 2008 and 2012 (including the Great Recession and its immediate aftermath), about one-third left within six months, half left within 12 months, and two-thirds left within 2 years.² Other studies have found similar spells among participants when measured from when they began participating in SNAP. A study that used administrative data in Oregon found that among those spells beginning in 2009, about one in eight

² Joshua Leftin, *et al.* “Dynamics of Supplemental Nutrition Assistance Program Participation from 2008 to 2012,” USDA Food and Nutrition Service, December 2014, <https://fns-prod.azureedge.net/sites/default/files/ops/Dynamics2008-2012.pdf>.

spells ended within 5 months, and close to half ended in six to 12 months.³ A recent study using administrative data in Michigan found that over half of SNAP entrants leave at some point within their first year of participating.⁴

While estimates of SNAP participation spells among new participants generally find half or more of participants participate for one year or less, other methods that capture a snapshot of participants will find much longer average spells because of length-biased sampling. For example, the same USDA study of SNAP participation dynamics that found that the median length of a participation spell for new participants was 12 months also conducted analysis looking at a cross-section of participants, meaning all participants who were in the caseload in a given month. Looking at participants in December 2008 and measuring completed SNAP participation spells (looking to the beginning prior to December 2008 and to the end of their spell or the end of the study period), the study found a median completed spell length of *eight years*.⁵ The timeframe used to define SNAP participation will have a significant impact on the estimate: snapshots of participants in any given month, which will include many more long-term participants, will find much longer participation lengths than an analysis that looks at a broader group of participants, such as one focused on those who entered SNAP in a specific month or anyone who participated at all over a longer period such as a year.

It is possible that the study already includes methods to adjust for this bias that were not mentioned in the information collection. If the study does not include such methods, it would oversample long-term SNAP participants, who may have characteristics that are distinct from shorter-term participants. The bias towards longer-term participants is especially problematic given the focus on working SNAP participants, who because of transitory work experiences (and for others who are not employed, the three-month time limit) are more likely to be short-term participants and under-represented in any single month snapshot. Depending on the goals of the study, ensuring that the study accurately captures SNAP participation could affect the results and policy applications. For example, if one of the study's goals is to ensure that employment and training programs are best suited to SNAP participants' work histories and training needs, than over-representing longer-term participants may show a disproportionate share of participants who are either out of the work force or working steadily for a longer period of time, a population who has different workforce needs than participants who have a more varied relationship to work, such as multiple short-term jobs. Or, if the Department would like to focus on barriers to SNAP participation, the analysis may miss many barriers faced by short-term participants.

There are several ways that the study could try to lessen the bias and increase the utility of the study. The study could sample participants who have participated in SNAP at any point within a longer timeframe, such as a year, rather than those who are participating in a single month. The study could survey participants who *entered* SNAP in a specific month in addition to a sample of those who are already participating. Researchers could also use data from other longitudinal surveys or studies, as well as any data collected from participants about their SNAP participation history, to adjust or at

³ Scherpf *et al.* This distribution is for completed spells, meaning it does not include spells that were still in progress at the end of the study period.

⁴ Colin Gray, "Why Leave Benefits on the Table? Evidence from SNAP," Upjohn Institute working paper, 18-288, https://research.upjohn.org/cgi/viewcontent.cgi?referer=&httpsredir=1&article=1306&context=up_workingpapers.

⁵ Leftin *et al.*

least contextualize their findings, such as weighting participants by SNAP participation length or creating ranges by incorporating varying assumptions about SNAP participation length. If the study authors wish to focus on long-term participants, rather than the broader group of individuals such as the working poor who have more varied SNAP participation patterns, then re-framing the study to explicitly state this focus would improve its accuracy.

Broadening Sampling Timeframe for Employment Would Also Improve Study

The proposed study could also be strengthened by using additional data sources or other methods to capture a fuller picture of work than current employment status among participants or self-reported retrospective work histories. The study objectives listed in the collection notice include to produce “descriptive statistics on employment status and employment characteristics”, as well as statistics on “length of detachment from the workforce”. The notice does not provide detailed information about how the study will collect data on participants’ work status or histories. Without careful methods that examine the dynamic and complex relationship between SNAP and work, the study could present an oversimplified picture of employment among SNAP participants, undermining one of the chief objectives of the study.

Work is often unstable for low-income individuals, and SNAP can play varied roles for participants who work or are out of the workforce. Participants can receive SNAP to supplement low wages from employment on a short-term or long-term basis; to fill gaps in their food budget temporarily after they lose a job; as a long-term support to help them buy food if they can’t work; and consistently to help them both when they are working and when they are not, if their income stays low in both scenarios. While looking at participation lengths among participants in any given month will over-represent long-term participants, it is also likely to over-represent non-workers, since people are more likely to turn to SNAP when they are without work and workers are less likely to participate in SNAP without interruptions.⁶

The text box below augments the previous hypothetical example of SNAP participation measurement to illustrate the concept of measuring work over different timeframes. As the conceptual example shows, the smallest work rate will generally be when looking at work rates among SNAP participants in any given month, since that measure will be affected both by the length-biased sampling and by the over-representation of jobless workers in a cross-section of participants.

⁶ For more on this complex relationship between SNAP and work, see Brynne Keith-Jennings and Raheem Chaudhry, “Most Working-Age SNAP Participants Work, But Often in Unstable Jobs,” Center on Budget and Policy Priorities, November 25, 2019, <https://www.cbpp.org/research/food-assistance/most-working-age-snap-participants-work-but-often-in-unstable-jobs>.

Illustrative Example: Capturing SNAP Spells and Employment Rates

Capturing employment among SNAP participants in any given month will likely understate employment because individuals are likelier to participate in SNAP when they are out of work. The table below shows employment with an “x” in each month when participants work, and shading indicates SNAP participation.

Participants have various work patterns in this illustrative year. Two participants, Joe and Jeb, do not work at all over this year, as they do not have an “x” in any of the 12 months shown. Joe consistently receives SNAP, as illustrated by the shading in each month, and Jeb only receives SNAP for three months. Two additional participants, Jay and Joy, work every month. Jay also receives SNAP every month, but Joy only receives SNAP for half of the year. For the other six individuals, both their work and SNAP participation patterns are more complex, with intermittent periods of each.

Table 2. Illustrative example of employment and SNAP caseload dynamics. (Shaded months indicate SNAP participation that month and “x” represents employment in that month.)												
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Joe												
Jay	X	x	x	x	x	x	x	x	x	x	x	x
Jan						x	x	x	x	x	x	x
Jill	X	x	x	x	x							
Jed	X	x								x	x	x
Jen						x	x	x	x			
Jon	X	x	x	x	x	x				x	x	x
Jeb												
Jin			x	x	x		x	x	x			
Joy	X	x	x	x	x	x	x	x	x	x	x	x

In this example, of these ten individuals who receive SNAP at some point in the year (“annual participants”), eight people (80 percent) have been employed *at some point* in the last year, all but Joe and Jeb.

Using the annual definition of work when looking at monthly SNAP participants may also be useful. In each month in this example, there are five SNAP participants. Each month, three to four of these five SNAP participants have worked in the last year. For example, Joe, Jay, Jan, Jen, and Jin participated in SNAP the month of January; four of the five January participants (80 percent, all but Joe) worked in the last year. In this example, about 75 percent of monthly SNAP participants on average have worked in the last year.

Among all ten individuals who received SNAP at any point in the last year, five of these ten individuals are working each month (50 percent), though often not in the months when they are receiving SNAP.

The share of participants who are working while participating in SNAP in any given month is the smallest. For example, in January, the five SNAP participants are Joe, Jay, Jan, Jen, and Jin. Of those five people, only one (20 percent), Jay, is both working and receiving SNAP in January. On average, about 33 percent of people receiving SNAP in any one of these 12 months also worked that month. Table 3 summarizes these illustrative examples of work rates calculated using different timeframes to define employment or SNAP participation. As the table shows, the timeframe used to define people as SNAP participants or as workers will have a significant impact on their work rates and likely other characteristics.

Table 3. Monthly and annual work rates among monthly and annual SNAP participants (in illustrative example)	
Share of people who received SNAP at any point in the last year (annual SNAP participants) who worked at any point in the last year (annual employment)	80%
Share of people receiving SNAP in an average month (monthly SNAP) who worked in the last year (annual employment)	75%
Share of people who received SNAP at any point in the last year (annual SNAP participants) who worked in an average month (monthly employment), regardless of whether they received SNAP while working	50%
Share of people receiving SNAP in an average month (monthly SNAP) who worked that month (monthly work)	33%

Some recent studies have used longitudinal or matched administrative data to examine the complex dynamics of work and SNAP participation. As these studies show, research that uses methods to investigate dynamics of employment and SNAP participation finds that SNAP participants have significant volatility with regards to employment and that SNAP plays different roles in supporting workers and those with barriers to work.

- A 2015 study by the Economic Research Service estimated annual eligibility rates for SNAP participants using the Survey of Income and Program Participation, meaning it measured the share of people who were eligible at some point during the year who participated. This study found that “about 84 percent more working poor were eligible for SNAP at some time during the year than in an average month, reflecting the transitory nature of eligibility for the working poor. Only about 25 percent of the working poor who were ever eligible during the year were eligible all 12 months.”⁷ While this study focused on eligibility and not SNAP participation, the analysis demonstrated that low-income workers are more likely to have volatility with regards to income and SNAP eligibility, which would likely also translate into complex SNAP participation trends.
- A Center on Budget and Policy Priorities study that also used SIPP data used two methods to measure SNAP participation and work. First, the study measured work rates among non-disabled childless adults in a specific month while they were receiving SNAP, finding that over half of them were working this period, but the share who worked within a year of that month (in the previous or subsequent year) was even higher: 74 percent. This study also looked at a group of participants who ever participated over a 3.5 year period, and found that these individuals worked most of the months studied (they had employment in about 60 percent of all months studied), but were more likely to receive SNAP when they were not working.⁸
- A 2008 study used panel data, including five interviews over a six-year period matched with administrative records, among women who received cash assistance as single-parent households in February 1997 in an urban county in Michigan. This study analyzed these participants’ use of TANF and food stamps over this period, which included several major changes to both programs along with changes in the business cycle.⁹ It found that both work and food stamp participation were dynamic. For example, the study found that the survey participants worked close to 70 percent of the months in this six-year period, but “more than half experienced at least one spell of ‘unstable employment,’ defined as having been fired, laid off, or otherwise not having worked for more than four weeks.” The study used several specifications to examine food stamp participation with regards to employment, finding variable patterns. For example, the researchers focused on a sample of participants who lost a job after a month in which they did not get food stamps or cash assistance, finding that a significant share returned to food stamps after three months (24 percent) and nine months (42

⁷Mark Prell, Constance Newman, and Erik Scherpf, “Annual and Monthly SNAP Participation Rates,” USDA Economic Research Service Research Report Number 192, August 2015, https://www.ers.usda.gov/webdocs/publications/45412/53600_err192.pdf?v=0.

⁸ Keith-Jennings and Chaudhry

⁹ Brian Cadena, Sheldon Danzinger, and Kristin Seefeldt, “The Dynamics of Food Stamp Receipt after Welfare Reform Among Current and Former Welfare Recipients,” in *Income Volatility and Food Assistance in the United States*,” edited by Dean Jolliffe and James P. Ziliak, W.E. Upjohn Institute for Employment Research, Kalamazoo, Michigan, 2008.

percent) out of work. Another analysis focused on exits from SNAP found that two years into a SNAP spell, 32 percent of women had left the program in a month when they were employed, and 13 percent had exited without work. An analysis that focused on participants who had left the program at least once since 1997 found that over 60 percent returned to food stamps at one point. This study demonstrated varying relationships between work and safety net use, with food stamps often providing a supplement to low earnings, a cushion after a job loss, and a steady support for workers experiencing volatility.

- A recent study in Oregon used a matched administrative data set that linked SNAP records with unemployment insurance data that can measure most work. The analysis focused on households that started a new SNAP participation spell in 2009 and followed those households over five years. Of those households, over three-quarters (78 percent) had a wage-earner with earnings in the UI system at some point in the five-year period (of 2009 through 2013). These households with workers had considerable heterogeneity in their experiences, with a mix of intermittent full-time and part-time work and an hourly wage of about \$14 per quarter (dividing earnings by hours for workers). About 80 percent experienced quarter-to-quarter wage gains during this period, and a similar share (84 percent) experienced wage *losses* from quarter to quarter. Over two-fifths (44 percent) of these workers experienced a period of unemployment during the 5-year period, receiving on average 58 weeks of unemployment benefits. The authors concluded, “Evaluating how a program is functioning for such a group with such variety—those with greater or lesser attachments to the labor force...requires careful examination of the complex processes and trajectories for clients.”¹⁰

The study authors may also consider potential error from using retrospective questionnaires about work histories, if the study plans to use such methods. Particularly for respondents with complex work histories common among SNAP participants (such as a mix of part-time and full-time work, or various short-term jobs of different lengths, for example), the study may have limitations with regards to accurately capturing past employment. Research shows that accurately recalling complex work histories such as multiple job holding or short employment/unemployment spells, particularly with recall of information over long periods of time, can be challenging and subject to error.¹¹ This potential mismeasurement is of concern given that providing information about employment patterns

¹⁰ Deana Grobe, Mark Edwards, and Bruce Weber. “The Complex Dynamics of Work, Wages, and Supplemental Nutrition Assistance Program Participation,” *Journal of Poverty*, Volume 23, Issue 6, 2019, <https://www.tandfonline.com/doi/full/10.1080/10875549.2019.1616032>.

¹¹ For example, Abraham *et al* found that in comparing data self-reported in the Current Population Survey to the employer data from the UI system, workers who were unemployed for some periods, with jobs with low earnings, and in industries with self-employed workers were more likely to have discrepancies between those data sources. (Katharine G. Abraham, *et al*, “Exploring Differences in Employment between Household and Establishment Data,” *Journal of Labor Economics*, Vol. 31, No. 2, April 2013, http://econweb.umd.edu/~haltiwan/Exploring_Differences_Employment_Household_Data_JLE_2013.pdf.) Using data from Sweden, Pina-Sanchez *et al* found that workers tend to omit the number of spells of unemployment, particularly over a long recall period, and to underreport the length and misreport the timing of unemployment spells. (Jose Pina Sanchez, Johan Koskinen, and Ian Plew, “Measurement Error in Retrospective Work Histories,” *Survey Research Methods*, Vol. 8, No. 1, 2014, <https://ojs.ub.uni-konstanz.de/srm/article/view/5144>.) In an earlier survey of sources of measurement error in surveys, Mathiowetz, Brown, and Bound state that studies have found that unemployment is often under-reported in retrospective work histories, particularly among individuals with more complex work histories and with longer recall periods. (Nancy Mathiowetz, Charlie Brown, and John Bound, “Measurement Error in Surveys of the Low-Income Population,” in *Studies of Welfare Populations: Data Collection and Research Issues*, National Research Council, 2002, <https://www.nap.edu/catalog/10206/studies-of-welfare-populations-data-collection-and-research-issues>.)

among SNAP participants appears to be one of the primary goals of the study, and the study design as presented in the collection notice does not address this challenge, though the study authors may already have developed methods to address this issue.

There are several ways the study could use methods to ensure that the employment status and history, one of the main objectives of the study, are accurate and not biased by the selection of participants in one month of SNAP participation or prone to error due to challenges with recall of retrospective work histories. Ideally, the study could follow participants over a long enough time period to capture the varied employment patterns among participants in the months following the survey or prior to their current SNAP participation spell instead of relying solely on participants' recall of their employment histories and work status in that specific month. One potential option could be to use other data such as wage data linked from other administrative datasets such as Unemployment Insurance quarterly wage data or wage or employment data from the SNAP administrative data to supplement participants' recall, at least in some states as a means to provide a comparison point for the survey results. Another option could be to include additional follow-up surveys in the future to shorten and simplify the recall period from each survey, such as returning to the same participants several months or one year later. The study could also use data from comparable participants in other surveys or datasets to compare to these study participants to provide more context or conduct sensitivity analyses. If the study instead will focus on current employment and is not able to incorporate any method to improve upon the employment histories, the study authors should acknowledge these limitations.

Including Social and Economic Factors Would Increase Utility of Research on Associations Between Characteristics and Employment

The collection notice indicates that one of the study objectives is to “examine the individual associations between key characteristics and employment status adjusted for other relevant characteristics”. The study does not elaborate on what variables they will consider, and whether the study will primarily focus on factors among individuals (such as their educational attainment or health status) and whether they will observe economic and social factors such as labor force metrics or job quality measures. The study will have greater utility if it can examine both external economic, social, and other factors that affect employment patterns along with individual characteristics such as demographic characteristics. Examining whether these associations also hold with similar non-participants could also increase the information provided. And, as we explain above, the study needs to be careful to acknowledge the variation and complexity in work dynamics; presenting employment as a stable, binary condition for SNAP participants would greatly oversimplify work and do a disservice to the study's objectives.

Incorporating these aspects will ensure that the study provides proper context. SNAP responds to labor market conditions by providing benefits for individuals with precarious and low-paid work; there is little evidence that receiving SNAP has a significant effect on labor force participation or employment.¹² Examining the employment characteristics of SNAP participants without discussion

¹² Studies that have examined the effects of the rollout of food stamps in the 1960s and 1970s and comparing immigrants with changing access to SNAP have found that access to SNAP has had very modest impacts on labor force participation among certain groups of households. (See Diane Whitmore Schanzenbach, “Exploring Options to Improve the Supplemental Nutrition Assistance Program (SNAP),” *The Annals of the American Academy of Political and Social Science*, November 6, 2019, <https://journals.sagepub.com/doi/full/10.1177/0002716219882677>. Recent research has also found

of this broader context may result in a study that inaccurately portrays the employment characteristics of participants as unique to those participants and resulting from SNAP participation, rather than explaining how SNAP responds to the labor market factors affecting employment opportunities. The information collection notice did not include a detailed list of variables to be considered, and many of these factors may already be reflected in the survey instrument or may not be feasible to collect. To the extent these additional variables are feasible to include in the study, including them would strengthen the utility of the study.

Many factors can affect whether a participant can obtain and keep a job and whether they are likely to experience periods of unemployment or labor force detachment. While it may not be feasible for the study to incorporate all of these factors, it would be helpful if the study could incorporate some discussion of external economic and social factors that they observe are connected with employment patterns, in addition to any individual characteristics:

- The availability and accessibility of jobs, which could be measured in different ways, will affect workers' chances of obtaining a job. Various labor market metrics, particularly those matched with participants' geographic location or other characteristics such as occupation or industry, may be useful in understanding job availability. For example, a recent USDA study found that when looking at three labor market indicators (unemployment rate, total number of people employed, and new hires), in local labor markets (commuting zones), they found that the probability of non-disabled SNAP participants exiting SNAP was linked to improvements in those metrics in local labor markets. The researchers also found effects by industry, such as an increase in exits from SNAP with increases in hires in the food service and lodging industry at the commuting zone level.¹³ This research shows how identifying labor market changes at the local and industry-level can be helpful in understanding SNAP participants' responsiveness to labor market conditions. The proposed study could include data about labor market metrics in the areas where participants live, and as much as the study is able to incorporate metrics that are more applicable to this population, the more relevant they will be and useful for the purposes of the study.

Another element that may affect whether SNAP participants can find jobs is “spatial mismatch”, or the disconnect between where low-income workers live and where available jobs are located. For example, one recent study compared the distance between the residence of low-wage jobseekers and job postings based on data from an online marketplace for hourly jobs. This study found, for example, that in 12 major metropolitan areas, within at least 9

that waiving the three-month time limit for certain adults without dependents did not discourage employment among older individuals, in part because many were out of the workforce due to other factors such as health reasons; similarly, research has found that subjecting individuals to the time limit does not substantially increase employment, suggesting that factors outside of SNAP affect labor force participation and employment opportunities. Jeehoon Han, “The Impact of SNAP Work Requirements on Labor Supply,” SSRN, August 30, 2019, https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3296402, Brian Stacy, Erik Scherpf, and Young Jo, “The Impact of SNAP Work Requirements,” preliminary paper presented at the Allied Social Science Associations conference, December 14, 2018, <https://www.aeaweb.org/conference/2019/preliminary/paper/Z8ZhZBZt>, Colin Gray, et al, “Employed in a SNAP? The Impact of Work Requirements on Program Participation and Labor Supply,” September 2019, <https://economics.mit.edu/files/17896>.

¹³ Scherpf et al.

percent of zip codes in each area, job postings far exceeded jobseekers in those zip codes.¹⁴ Other studies have found that workers in areas with greater job accessibility, a measure of proximity to employment opportunities relative to other nearby jobseekers, find work more quickly and have lower unemployment rates.¹⁵ If the proposed study is not able to examine job accessibility, including variables such as access to transportation or distance from likely employers would help improve the utility of the study.

- Labor market discrimination, which is well documented for workers of color and others such as those returning from incarceration, may also affect their job opportunities. For example, studies have found that workers of color are less likely to be called back from employers than white workers with identical qualifications.¹⁶ The study will likely collect demographic information and the collection notice indicates they will collect information about barriers, which may apply to discrimination. If at all possible, probing workers' experiences applying for jobs and any perceived experiences of discrimination may also help strengthen the findings.
- Factors related to the conditions of employment and availability of services that support work may also affect job tenure and turnover. While some SNAP participants are consistently employed or out of the labor force, many others have more varied experiences with some work experience interspersed with periods of joblessness. In examining factors that contribute to employment, it may be as important to consider what factors affect the duration and dynamics of employment rather than comparing employment to no employment.

Workers in jobs where schedules vary and where workers have little control over their schedules tend to have shorter job tenures, since workers in these jobs may have difficulty arranging child care and tending to other family needs, may experience more hardship as a consequence of greater financial instability, and may experience lower job satisfaction. A recent survey of service workers found that workers who experience more schedule instability have higher rates of turnover.¹⁷ Similarly, most low-paying jobs do not offer paid sick leave. For example, an annual Bureau of Labor Statistics survey of employers finds that less than half of workers with wages in the bottom quarter have access to paid sick leave, compared to 92

¹⁴ Christina Stacy, Brady Meixell, and Serena Lei. "Too Far from Jobs: Spatial Mismatch and Hourly Workers," Urban Institute, February 21, 2019, <https://www.urban.org/features/too-far-jobs-spatial-mismatch-and-hourly-workers>

¹⁵ Rucker Johnson, "Landing a job in urban space: The extent and effects of spatial mismatch," *Regional Science and Urban Economics* (February 2006), pp. 331-372, [https://www.ssc.wisc.edu/~gwallace/Papers/Johnson%20\(2006\).pdf](https://www.ssc.wisc.edu/~gwallace/Papers/Johnson%20(2006).pdf). Fredrik Andersson *et al.*, "Job Displacement and the Duration of Joblessness: The Role of Spatial Mismatch," *National Bureau of Economic Research* (April 2014), pp. 1-50. <https://www.nber.org/papers/w20066.pdf>. Jangik Jin and Kurt Paulsen, "Does Accessibility Matter? Understanding the Effect of Job Accessibility on Labour Market Outcomes," *Urban Studies* (2018), pp. 92-115. <https://journals.sagepub.com/doi/abs/10.1177/0042098016684099>.

¹⁶ For example, see: Lincoln Quillian *et al.*, "Meta-Analysis of Field Experiments Shows No Change in Racial Discrimination in Hiring Over Time," *Proceedings of the National Academy of Sciences of the United States of America* (April 2017), pp. 1-6, <https://www.pnas.org/content/early/2017/09/11/1706255114>

¹⁷ Joshua Choper, Daniel Schneider, and Kristen Harknett, "Uncertain Time: Precarious Schedules and Job Turnover in the U.S. Service Sector," Washington Center for Equitable Growth, October 2019, <https://equitablegrowth.org/working-papers/uncertain-time-precarious-schedules-and-job-turnover-in-the-u-s-service-sector/>.

percent of workers with wages in the top quarter.¹⁸ Not having access to paid sick leave can mean that workers experiencing a health crisis or caring for a sick child may end up losing income or a job. For example, a study found that workers with access to paid sick leave or paid vacation were more likely to stay in their current job. This study found these effects even when controlling for other characteristics of workers, such as education level or income, or characteristics of jobs (such as the size of the firm and other benefits provided) that are associated with more job separations.¹⁹ Research has also found that workers lacking paid sick leave are more likely to receive government benefits such as SNAP.²⁰ Some of the characteristics the proposed study could examine include the occupations of participants and job quality of prior or current jobs, such as stable scheduling or access to benefits.

In addition to job conditions, the lack of key supports such as stable housing and transportation and access to affordable child care may also contribute to volatility or periods of joblessness among low-income workers. For example, recent research finds that low-income renters who experience a forced move (such as following an eviction) are more likely to be laid off from their jobs, compared to similar renters who did not experience a forced move.²¹ Child care is often unaffordable for many low-income parents, and funding for subsidies to help defray them is limited. But, studies show that providing support to increase access to child care helps parents work: low-income women with access to affordable child care through subsidies are more likely to participate in the labor force and to be employed, research finds.²² For many low-income workers, access to reliable and affordable transportation also presents a challenge to stable employment. For example, research done by regional Federal Reserve banks has found that transportation access presents a barrier to work for many low-income workers.²³ The study could incorporate questions on topics such as access to child care, housing status, and transportation access as potential barriers to work to help ensure the analysis includes those external factors.

¹⁸ Bureau of Labor Statistics, Employee Benefit Survey, “Leave Benefits: Access”, Table 32, March 2018, <https://www.bls.gov/ncs/ebs/benefits/2018/ownership/civilian/table32a.htm>.

¹⁹ Heather Hill, “Paid Sick Leave and Job Stability,” *Work Occup.*, 2013, <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3825168/>.

²⁰ Patricia Stoddard-Dare, *et al.* “Paid sick leave status in relation to government sponsored welfare utilization,” *American Journal of Orthopsychiatry*, January 2018, <https://psycnet.apa.org/record/2018-07167-001>.

²¹ Matthew Desmond and Carl Gershenson, “Housing and Employment Insecurity Among the Working Poor,” *Social Problems*, Vol. 63, Issue 1, February 2016, <https://academic.oup.com/socpro/article-abstract/63/1/46/1844105>.

²² Kimberly Burgess, Nina Chien, and Maria Enchautegui, “The Effects of Child Care Subsidies on Maternal Labor Force Participation in the United States,” U.S. Department of Health and Human Services, December 2016, <https://aspe.hhs.gov/system/files/pdf/253966/EffectsCCSubsidiesMaternalLFPBrief.pdf>.

²³ Federal Reserve Bank of Cleveland, “A Long Ride to Work: Job Access and Public Transportation in Northeast Ohio,” November 2015, <https://www.clevelandfed.org/newsroom-and-events/publications/a-look-behind-the-numbers/albtl-20151123-a-long-ride-to-work-job-access-and-public-transportation-in-northeast-ohio.aspx>; Federal Reserve Bank of Philadelphia, “Accessing Economic Opportunity: Public Transit, Job Access, and Equitable Economic Development in Three Medium-Sized Regions,” December 2018, <https://www.philadelphiafed.org/-/media/community-development/publications/special-reports/public-transit/accessing-opportunity.pdf?la=en>; Federal Reserve Bank of San Francisco, “The Rise of Underemployment: Supporting the Needs of Low-Income Workers,” March 2017, <https://www.frbsf.org/community-development/files/rise-of-underemployment-supporting-needs-low-income-workers.pdf>.

- Include comparisons to non-SNAP participants: While the study is focused on employment among SNAP participants, most factors that will affect employment characteristics are independent of their SNAP participation. A worker who has trouble finding a job due to a transportation barrier or who lost a job because they had a serious illness would lose a job regardless of whether they received SNAP (though participating in SNAP would help ensure that they can afford food while unemployed). By providing benefits to low-income individuals, SNAP responds to many problems in the labor market, such as unstable and low-paying work. Without incorporating any context about how these factors affect employment, the study could run the risk of suggesting that SNAP participation drives employment patterns, rather than the other way around. Studying the factors that contribute to employment patterns among low-income individuals overall, including those who do not participate in SNAP, could add to the proposed study, by showing how these external factors affect workers regardless of SNAP participation. To the extent SNAP participants differ, it may be useful in uncovering whether some eligible workers face barriers to participating in SNAP. On the other hand, SNAP participants are likelier to be more disadvantaged and face more barriers to employment than non-participants, so the study authors would need to be careful to control for selection bias.

Survey May be Able to Draw on Existing Data Sources to Complement Data Collection

Existing resources such as Census datasets may help the researchers fill in gaps from their data collection, some of which are discussed above. To the extent the study will help inform agency operations, making sure that it reflects topics such as barriers for working SNAP participants that are directly related to the agency's operations may also help increase its utility.

Existing Data Sources May Help Complement Proposed Data Collection

Current survey data has detailed information on the job characteristics and patterns of SNAP participants. For example, the U.S. Census Bureau's American Community Survey (ACS) has a sample size of over 2 million households total, including about 134,000 unweighted households who reported SNAP participation in 2017. This survey has detailed information on current employment status and work over the last year, including a question on work history for those who report they are not in the labor force; occupation and industry and class of worker; commuting patterns; educational attainment; disability and health conditions that limit the ability to perform basic functions; veteran status; housing information; and demographic information such as age, race and ethnicity, and family information. The survey asks whether anyone in the household received food stamps in the last year.²⁴ The ACS has data for small geographic areas, which researchers could use to presumably look at unemployment rates and other statistics for local areas. Other options could include the Survey of Income and Program Participation (SIPP), which has longitudinal data on many detailed topics including SNAP participation, employment history, characteristics related to barriers, allowing researchers to examine how SNAP participation interacts with employment status over time.

Each survey will have some limitations and sources of measurement error that researchers would need to address, though promising practices such as linking administrative data with other sources

²⁴ U.S. Census Bureau, "2019 ACS Form,"

may be an option in some cases. Because SNAP participation is self-reported, there is some misreporting in the data, as some participants report non-participation and vice versa.²⁵ Some researchers have used linked administrative data linked with survey data to avoid this problem of misreporting, for example.²⁶ Other researchers have used econometric tools to mitigate this issue.²⁷ This new proposed data collection may help complement existing surveys by providing a larger sample of SNAP participants without reporting limitations, but the Department may also wish to use Census or other data sets to complement the survey data, such as by providing longitudinal data or exploring employment patterns of non-participants.

In addition to using existing survey data, researchers could also link SNAP administrative data with other records that could help examine workforce patterns and ultimately provide data on SNAP participants' work histories and factors associated with employment patterns. For example, as we described above, researchers at Oregon State University have used administrative SNAP data records linked with unemployment insurance data records and labor market indicators from the Quarterly Workforce Indicators to explore how local labor conditions affect SNAP exits, finding that improvement in local labor market conditions (and sometimes specific to certain industries and occupations) are significantly associated with SNAP exits.²⁸ Researchers used these linked data to further explore the complex dynamics of SNAP and work, finding that over a five-year period, over three-quarters of SNAP households had jobs with wages in the UI system, but with significant volatility.²⁹

Several data sources could offer robust information on SNAP participants' work histories and factors associated with employment that could help complement the data collection in the survey and address any shortcomings. For example, data sources that include longitudinal data, such as the SIPP or administrative data, would help avoid significant bias from the over-representation of non-workers and long-term SNAP participants in any given month, as described above, and most of these surveys would allow the Department to examine employment patterns among former SNAP participants or non-participants, which could also potentially improve the proposed collection.

There may be ways to improve this proposed survey to ensure that the information collection provides relevant information to the agency's main functions. The Department solicited comments on several topics, including "whether the proposed collection of information is necessary for the

²⁵Sandy Colby, Jose Debora, and Misty Heggeness, "How Well Do Individuals Report Supplemental Nutrition Assistance Program (SNAP) Take Up in Household Surveys?" U.S. Census Bureau, SEHSD Working Paper 2017-03, SIPP Working Paper 276, December 2016, <https://www.census.gov/content/dam/Census/library/working-papers/2017/demo/SEHSD-WP2017-03.pdf>, and Benjamin Cerf Harris, "Within and Across County Variation in SNAP Misreporting: Evidence from Linked ACS and Administrative Records," U.S. Census Bureau, CARRA Working Paper Series, July 2014, "<https://www.census.gov/content/dam/Census/library/working-papers/2014/adrm/carra-wp-2014-05.pdf>."

²⁶ Amy O'Hara, Rachel Shattuck, and Robert George, "Linking Federal Surveys with Administrative Data to Improve Research on Families," *Annals of the American Academy of Political and Social Sciences*, December 2016, <https://journals.sagepub.com/doi/abs/10.1177/0002716216678391?journalCode=anna>.

²⁷ Nikolas Mittag, "Correcting for Misreporting of Government Benefits," IZA Discussion Paper 10266, October 2016, <https://pdfs.semanticscholar.org/f28a/0b7b1595e0d538c2db0951ffee1baabee0c4.pdf>.

²⁸ Scherpf et al.

²⁹ Grobe et al.

proper performance of the functions of the agency”. Linking the study with the goals of SNAP may yield a more useful study. As discussed above, factors external to SNAP are the main drivers of employment patterns among participants, such as local labor market conditions. While the Department has a limited role in affecting employment patterns, understanding these factors may help the Department identify ways to improve operations within its purview, such as ensuring that SNAP is available to eligible individuals and understanding how the Department can assist participants with addressing barriers to work.

One way the Department can ensure that the proposed survey is useful is to ensure that it yields information that can help the Department set policies that will ensure eligible workers, including workers with complex work patterns, can access and stay connected to SNAP. The primary purpose of SNAP as established in 7 U.S.C. 2011 is to “to safeguard the health and well-being of the Nation’s population by raising levels of nutrition among low-income households”. States have made gains to improve participation among eligible workers, but continuing to remove administrative barriers to SNAP for low-income workers would help fulfill this mission to improve food security for this population. For example, studies have shown that SNAP participants are more likely to exit SNAP at recertification and reporting months, which suggests that these paperwork requirements may result in eligible participants losing benefits.³⁰ Surveys of SNAP participants have also found that the length and the complexity of the application and recertification process can be difficult for working households.³¹ To provide these data, the survey would need to ask participants about their SNAP participation spells and causes for SNAP exits, and to solicit information on reasons for SNAP exits from people who are no longer participating in SNAP.

The Department may also believe that this information would be helpful in its oversight of employment and training programs, such as ensuring that those programs provide services that are relevant to and most effective for SNAP participants. If that is one goal for this survey, the study would need to build off of previous research, such as the Employment and Training Characteristics Study that surveyed work registrants, E & T participants, and employment and training providers, as well as the evaluations of the pilot projects that determine what models are most effective at increasing employment.³² The study may also want to draw on previous research about best practices in employment and training and workforce development programs. The study would also want to include discussion of barriers to employment and training. The survey instrument would need to be designed specifically to ask questions that would be most helpful for those purposes, such as those about workforce needs, availability of and past participation in training programs (and any outcomes from that participation, including whether those individuals have been subject to sanctions), and about barriers to participation in employment and training programs.

³⁰ Gray 2018, Grobe *et al* 2019.

³¹ Heather Hahn, Michael Katz, and Julia Isaacs, “What Is It Like to Apply for SNAP and Other Work Supports?”, Urban Institute, August 2017, https://www.urban.org/sites/default/files/publication/92766/2001473_whats_it_like_to_apply_for_snap_and_other_work_supports.pdf.

³² Gretchen Rowe, Elizabeth Brown, and Brian Estes, “SNAP Employment and Training (E&T) Characteristics Study: Final Report,” October 2017, <https://www.mathematica.org/our-publications-and-findings/publications/snap-employment-and-training-e-t-characteristics-study-final-report>.

Summary: Using Methods to Mitigate Bias and Contextualize Findings Would Improve Utility of Study

The relationship between SNAP participation and employment is varied, and the proposed study could add to the existing body of knowledge by collecting information from a large sample of SNAP participants. This information would be useful if it reflects the complexity of this relationship by using techniques and additional data sources to provide a fuller picture of SNAP participation and work beyond a single survey month and beyond individual characteristics of participants. Broadening the timeframe to measure SNAP participation and employment and including analysis of external factors that can affect employment could ensure that the study does not present oversimplified information, and can provide information that is relevant to the Department's functions.

Sincerely,

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