

# Supporting Youth Aging Out of Foster Care through SNAP

## What Is Food Insecurity?

Food insecurity is related to, but not synonymous with hunger. The concept of “food security” is used by the U.S. Department of Agriculture to measure a household’s social and economic ability to access adequate food. The most common cause of food insecurity is poverty, but in a broader sense other factors—including housing costs, medical costs and lack of access to food retailers or culturally appropriate foods—can also impact food security. Food insecurity of any degree indicates a lack of resources needed to meet basic needs and a risk of poorer health outcomes due to lower quality nutrition. Poor nutrition is detrimental to individuals of all ages, but it is especially damaging to children and young adults who are still growing and developing.



## Introduction

Food insecurity is not a problem unique to former foster youth, but it is a problem that they experience at disproportionate rates. Nationwide, 48.1 million people lived in food insecure households in 2014, meaning that they were unable to consistently access enough, nutritious food. Within that group, 12.4 million adults lived in households with very low food security, a classification that was previously labeled as “hunger,” and is characterized by less-than-adequate food consumption and disrupted meal patterns.<sup>1</sup> Poverty is a root cause of food insecurity, leaving households without the resources to buy enough, nutritious food. Because youth aging out of foster

care are particularly at risk of experiencing poverty, they are also disproportionately impacted by food insecurity.

With food insecurity comes a host of other risks to former foster youths’ well-being. Poor nutrition and food insecurity—compounded by lack of health care, limited social connections and insufficient housing—can contribute to a number of diet-related illness like obesity, diabetes and high blood pressure, each of which can exacerbate an existing health condition, like asthma. Food insecurity is also detrimental to mental health. The stress that comes from not knowing where a person’s next meal will come from can cause or contribute to elevated stress levels, anxiety and depression.<sup>2</sup> A study in three Midwestern states found that young adults who recently aged out

## Youth Aging Out of Foster Care

In FY 2014, 22,392 young adults aged out of the foster care system without a permanent family to provide them with support and stability. Of the children who aged out of foster care between 2008-2013, more than half spent time in a congregate care setting, where they were even less likely to form permanent relationships with adults who could support them as they transitioned to adulthood. In comparison, only 14 percent of all children in foster care lived in congregate care settings in 2013.<sup>26</sup>

Among all children in foster care at the end of FY 2014, 52 percent were male and 48 percent were female. Forty-two percent were white (compared with 52 percent of all U.S. children), 24 percent were black or African American (compared with 14 percent of all U.S. children), 22 percent were Hispanic (compared with 24 percent of all U.S. children), two percent were American Indian/Alaskan Native (compared with one percent of all U.S. children) and one percent were Asian (compared with 5 percent of all U.S. children), with the remainder unknown or of two or more races.<sup>27,28</sup>

## Food Insecurity in the United States in 2014



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of the foster care system were more than three times as likely to describe their health status as “fair” or “poor.”<sup>3</sup> These health disparities can persist long after youth leave foster care, making access to good nutrition all the more important.

In the majority of states, youth “age-out” of foster care at age 18. Although the child welfare system was primarily responsible for youth’s well-being for the duration of their time in foster care, upon aging out of the system, former foster youth can quickly find themselves overwhelmed by all the burdens that come with independence, while also lacking many of the supports that come from a stable, permanent family. Most American youth are not able to fully support themselves financially at age 18, or even by age 21, which is the cut-off year for youth in states with extended foster care. Particularly for foster youth who live in the 27 states<sup>4</sup> that have not chosen to extend foster care beyond age 18, there are few alternatives to support their transitions and many end up hungry, homeless and in poor health. These young people generally entered the foster care system as a result of traumatic

events and may have experienced a high degree of instability as children and during their time in foster care. Gaining stability upon leaving the foster system is imperative for their current and future well-being, as is good nutrition. The Supplemental Nutrition Assistance Program, or SNAP (formerly known as the Food Stamp Program) can provide a measure of support to these young people as they transition into adulthood.

SNAP benefits act as a buffer against the economic and health impacts of food insecurity, allowing former foster youth to grow into healthy, self-sufficient adults. Good health is a precursor to economic stability as it directly impacts a young person’s ability to find and retain employment or pursue an education. This is especially important for youth leaving foster care, as they experience both poorer health outcomes and disproportionately high rates of unemployment and homelessness. Unfortunately, some of SNAP’s rules serve to make it difficult for former foster youth to either gain access to benefits or maintain participation.



**SNAP is a strong potential support for former foster youth.** SNAP is administered by the U.S. Department of Agriculture’s Food and Nutrition Service and is the largest federal nutrition program. It provides monthly nutrition benefits to eligible low-income families and individuals that can be used to purchase food at authorized retailers. SNAP benefits can only be used to purchase eligible food, including bread, cereal, fruits and vegetables, meat and dairy products.

# SNAP for Able-Bodied Adults Without Dependents

SNAP generally operates as an entitlement program—all applicants who meet the program's eligibility requirements can receive the full amount of benefits for which they qualify. However, for one subset of the American population—classified as Able-Bodied Adults Without Dependents, or ABAWDs—SNAP benefits are time-limited.

The SNAP ABAWD provision, established by the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), places a time restriction on SNAP benefits to recipients ages 18-50, who are not classified as physically or mentally unfit for employment, who are not part of a household that includes someone younger than age 18 and are not pregnant. Those who fall into the ABAWD category must be employed or actively participating in a work program for at least 80 hours per month. Job search activities do not count toward the 80 hour requirement. Those who do not meet these requirements are limited to three months of SNAP benefits in a 36-month period. This is a very harsh penalty with negative impacts for youth aging out of foster care.

During the Great Recession, most states<sup>5</sup> used waivers from the federal government to suspend this penalty either statewide or in specific areas of a state that were experiencing prolonged, high unemployment levels.<sup>6,7</sup> In recent years, the use of such waivers has gradually declined as states have either seen their unemployment rates improve, or have simply chosen to reinstate time limits, despite their continued eligibility for an ABAWD waiver.

Starting in January 2016, time limits associated with the ABAWD provision went back into effect in 23 states<sup>8</sup> for the first time since the recession. As a result, an estimated 500,000 to 1 million low-income people, including former foster youth, will lose access to nutrition assistance through SNAP, beginning April 1, 2016.<sup>9</sup> To make the situation more worrisome, five of the states that reinstated the ABAWD rule in January 2016 are also among the 10 states with the highest rates of food insecurity.<sup>10,11</sup>

## How ABAWD Disadvantages Foster Youth

A significant number of youth aging out of foster care can be expected to be among the people who will be harmed by the reintroduction of these time limits. In 2013, a national survey of youth exiting foster care found that, at age 19, 13 percent received Social Security disability benefits that would exempt them from the ABAWD provision, and 12 percent were employed

full-time and therefore also exempt from the provision. The remaining 75 percent of youth aging out of foster care could be subject to time restrictions on nutrition assistance from SNAP under the ABAWD provision.

It is important to consider the detrimental impact time limits in SNAP can have on youth exiting the foster care system as they are in an especially vulnerable position as they transition into adulthood. Youth leaving foster care often do not necessarily have access to the same level of support and guidance from family that many other young people receive as they make their way into adulthood. Former foster youth have also likely experienced multiple school placements, in addition to trauma related to their entrance into the foster care system. These compounding factors create additional instability and undermine their ability to complete high school successfully in the same time frame as their peers. All of these factors suggest that former foster youth may need to turn to government assistance at some point to help them meet their basic needs as they mature into adulthood.

The barriers former foster youth face in accessing crucial supports, like SNAP, are significant. While unemployment and poverty rates are very high among former foster youth, their rate of participation in public assistance programs is relatively low, at 34 percent at age 19.<sup>12</sup> According to a national survey of youth who aged out of the foster care system, only 12 percent were employed full-time at age 19, and 23 percent were employed part-time at age 19 in FY 2013.<sup>13</sup> Among this same cohort, 44 percent had not obtained a high school diploma or GED equivalent at age 19, leaving them at a significant disadvantage in seeking stable employment with livable wages. High rates of homelessness reflect the increased economic instability of former foster youth: 19 percent of 19-year-old former foster youth who responded to the same national survey indicated that they had experienced homelessness at some point during the two previous years.<sup>14</sup>

Education is a key factor in assuring economic stability and self-sufficiency for former foster youth. However, attaining higher education comes with a unique set of challenges for young adults who have aged out of the foster care system. Students who lack family support will find it especially difficult to finance and attain

a college education, and will be particularly vulnerable to economic hardship and food insecurity. Students who are former foster youth may find some support from their college, but will likely lack that support during much of the year, in the months between academic terms. SNAP can provide a vital support to former foster youth as they pursue an education, but time limits remain a burden, and the SNAP application process for college students is complicated.

Furthermore, youth leaving the foster care system may find themselves shut out of many other programs designed to promote economic stability for people with low incomes. Youth transitioning to adulthood can easily fall into a gap—supports for youth have traditionally ended at age 18, but many federal services and benefits for adults were designed for older individuals or parents, despite the fact that young adulthood is a critical period of development. The Earned Income Tax Credit (EITC) lifted 6.2 million people out of poverty in 2013 by boosting the income of low-wage workers,<sup>15</sup> yet a youth leaving foster care will not be eligible for EITC until the age of 25, unless he or she has a dependent child. Furthermore, former foster youth who move out of the state in which they were in foster care may lose the guaranteed access to Medicaid that is provided by the Affordable Care Act up to age 26. This loophole has been closed by 13 states as of 2016,<sup>16,17,18</sup> but many young people remain susceptible to losing their health coverage, increasing the potential for continued health disparities and increased economic vulnerability among former foster youth.

## State Opportunities to Promote Access to SNAP

More needs to be done to support the well-being of youth as they transition out of foster care. SNAP can play an important role in the safety net for former foster youth, ensuring that they have access to nutritious food during times of economic hardship.

Several options are available to states within the current SNAP rules to make SNAP a stronger support to youth when they age out of the foster care system:

### DIRECT WAIVERS TOWARD FORMER FOSTER YOUTH

All states are given a “15 percent waiver” allowing them to exempt 15 percent of the individuals subject to time limits who would have remained enrolled in SNAP if the time limit were not in effect.<sup>19</sup> There is a good deal of flexibility built into this waiver that gives states pathways to protect former foster youth from losing their SNAP benefits. How a state chooses to use its 15 percent waiver is at the discretion of that state. Therefore, it is possible for a state agency to categorically exempt former foster youth age 26 and younger from the time limits imposed by the ABAWD provision. If a state chooses to implement this option, caseworkers must ask young applicants if they were in foster care on their 18th birthday.

Other, less direct methods of administratively distributing “15 percent” exemptions are also available to state agencies, and these methods can be used in combination with the categorical exemption previously discussed. Exemption criteria can be

## SNAP Eligibility for Students is Complex

Simply determining whether a college student meets the qualifications for SNAP is complicated. For students who are also former foster youth and lack a strong support system, navigating the SNAP application process and providing all the necessary documentation is a daunting and sometimes impossible task. Under SNAP rules, it is difficult to qualify for SNAP benefits as a college student. College students attending classes at least half-time must also work an average of 20 hours per week. Some students who work less than 20 hours per week may be eligible, but must prove they meet certain conditions. Students who may be eligible include those who meet one of the following requirements:<sup>29</sup>

- Receive federal work study
- Are caring for a child younger than age 12
- Have a disability
- Are enrolled in a government-sponsored education and training program, including SNAP Employment and Training programs and programs authorized by the Workforce Innovation and Opportunity Act



used to target the characteristics that make former foster youth especially vulnerable to poverty and food insecurity. One example is an exemption for individuals with less than a high school diploma or GED equivalent. Because those with less than a high school-level education are most likely to experience persistent or recurring unemployment and underemployment, they are also most vulnerable to the time limits associated with work requirements in SNAP. As former foster youth are also disproportionately likely to lack a high school diploma or GED equivalent, this kind of exemption would serve to protect many youth during their transition out of foster care. Similarly, “15 percent” exemptions can be targeted toward individuals experiencing homelessness, or who have recently experienced homelessness—another serious barrier to employment to which former foster youth are disproportionately vulnerable.

### **PROMOTE STABILITY THROUGH SNAP EMPLOYMENT & TRAINING**

Beyond the targeted use of exemptions, states can also help protect former foster youth from time limits in SNAP by ensuring they are connected to employment and training programs that would allow them to maintain their eligibility through approved work activities. Currently, very few eligible SNAP recipients ultimately receive employment and training services that would allow them to continue receiving SNAP benefits as they work toward a more stable economic future. However, in recent years, the U.S. Department of Agriculture has pushed for greater coordination and use of SNAP Employment & Training (SNAP E&T) funds to help connect SNAP recipients to long-term, stable jobs that would allow them to transition off of SNAP benefits. Additional federal funds for SNAP E&T are available to states that pledge to offer a qualifying SNAP E&T component to all recipients who are classified as ABAWDs and nearing the end of their three-month period of eligibility.<sup>20</sup> Qualifying SNAP E&T programs must be carefully designed to meet the needs of

participants and the conditions of the local job market to truly promote self-sufficiency. In 2015 the Department awarded pilot grants to 10 states<sup>21</sup> to determine the most effective ways to help SNAP recipients gain and retain stable jobs with good wages. These pilot projects will be monitored for evidence of successes and promising new strategies that could be implemented elsewhere. By ensuring former foster youth are able to access quality employment and training services, states can both protect their access to critical nutrition supports and help them gain stable, well-paying jobs.

### **IMPROVE PARTICIPATION THROUGH OUTREACH**

Before any of these options can make a difference for former foster youth, they must be able to enroll in SNAP in the first place. Data from the National Youth in Transition Database show that 30 percent of youth age 19 or older who have left the foster care system receive public food assistance, including SNAP. This number is remarkably low, considering that among the same surveyed population, 71 percent<sup>22</sup> participated in a Medicaid-funded state program. This is a wide gap, despite the fact that the two programs have similar income eligibility requirements,<sup>23</sup> and suggests that the application process for SNAP has not been made sufficiently accessible to youth leaving the foster care system.

Possible reasons for low participation of former foster youth in SNAP are varied, but outreach can play a big role in connecting these young people to nutrition assistance. Routinely screening youth for SNAP eligibility as they leave foster care is one simple solution that can increase participation in SNAP among youth leaving the foster care system.

For example, to address the low number of former foster youth in California who were applying for SNAP benefits (known as CalFresh), the California Department of Social Services advised



**The Preventing Sex Trafficking and Strengthening Families Act of 2014** mandates that states support the healthy development of youth in foster care and promote “normalcy” through engagement in healthy and developmentally appropriate activities.<sup>30</sup> The Act also requires that case plans for older youth include information on their rights to education and health and their right to stay safe and avoid exploitation. In addition, child welfare agencies are required to provide foster youth aging out of care with crucial documents, like a birth certificate, state-issued identification card and health insurance information. As this standard of providing information to youth aging out of care is implemented, states may opt to include information on additional supports young people may have a right to, including nutrition assistance benefits through SNAP.

## Lessons from Medicaid Outreach

Simplified eligibility determination, enrollment and renewal processes were implemented in the wake of the Affordable Care Act to improve access to health insurance under Medicaid for former foster youth. Lessons from state implementation of these processes for former foster youth can be applied to SNAP as well.

- Coordinate with child welfare agencies: The state of Maryland developed materials that inform foster youth about Medicaid coverage as well as Maryland's tuition waiver. Information about SNAP can be similarly bundled with other information provided by child welfare agencies to youth aging out of care.
- Use data matches: Some states—including Arkansas, Illinois, Oregon and West Virginia—have implemented administrative transfers that allow state agencies to use enrollment information from other programs to enroll eligible individuals into Medicaid. A similar process can be used to more quickly certify and recertify former foster youth as eligible for SNAP benefits.
- Engage former foster youth in outreach: By engaging current and former foster youth, states can effectively address the specific challenges facing youth aging out of care, in addition to building awareness in the community about supports available to former foster youth. The Coveredtil26 project of Children Now in California has used youth engagement to inform its outreach campaign on expanded Medicaid for former foster youth.

county social workers or probation officers to complete a CalFresh application with youth as a part of the standard process of meetings that case workers hold with youth when they transition out of the foster care system.<sup>24</sup> Other instructions include informing youth how to submit their completed application and introducing them, when possible, to the CalFresh eligibility worker who will process their application. Some counties have taken additional steps to ensure these young people's applications are processed as rapidly as possible.

All of these additional steps that minimize the burden placed upon youth leaving the foster care system are significant. Youth who have spent a significant portion of their lives dealing with state-imposed restrictions and bureaucracy are not likely to be inclined to negotiate a new system of rules and bureaucracy at the moment that they gain independence. Case workers can ensure that the SNAP application system is as navigable as possible, allowing former foster youth to build a system of supports for themselves before their need for assistance becomes acute.

Prior to the issuance of special instructions from the California Department of Social Services in 2009, less than five percent of youth leaving foster care in the state were applying for CalFresh benefits. Within two years, that number increased to 22 percent, with some counties showing markedly higher application rates, like Ventura County at 69 percent.<sup>25</sup> Increasing application rates by building application assistance into existing transition processes is an easy solution to help vulnerable youth ensure they will have enough, nutritious food as they transition into independence, grow into adulthood and build a stable economic future.

## Conclusion

Young people leaving the foster care system are not strangers to trauma and instability. As they exit foster care, leave the guardianship of the state and are expected to begin supporting themselves, they need and are owed a certain degree of support in meeting their most basic needs, including food security. Without good nutrition, former foster youths' chances at achieving good health, good jobs and a stable future begin to decrease.

SNAP can provide a small, but crucial support to these young people. However, harsh time limits imposed by the ABAWD provision can keep nutrition assistance out of reach. Beginning in 2016, these time limits will impact former foster youth to a degree not seen since before the Great Recession. There are measures states can take administratively within current SNAP rules to buffer former foster youth from benefit loss, including targeting them through strategic allotment of exemptions, the use of SNAP Employment & Training programs and purposeful outreach to youth as they are leaving the foster care system. All of these options can help guarantee that former foster youth do not lose access to SNAP even as they remain eligible by income.

# Endnotes

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