TESTIMONY
March 11, 2015

Ohio Association of Foodbanks
Ohio’s largest charitable response to hunger

HB 64

Health and Human Services Subcommittee
Ohio House Finance Committee

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The findings of our comprehensive assessment of able-bodied adults without dependents can be found at our website at:

Good afternoon Chairman Sprague, Vice Chair Sears, Ranking Minority Member Sykes and distinguished members of the subcommittee Representatives Antonio and Romanchuk. On behalf of the association, our 12 member Foodbanks and our 3,300 member charities I want to begin by thanking you for your service to this critical committee and our state’s most vulnerable citizens.

My name is Lisa Hamler-Fugitt and I serve as the executive director of the Ohio Association of Foodbanks, Ohio’s largest charitable response to hunger. We represent Ohio’s 12 Feeding America foodbanks and their 3,300 member hunger relief charities. Our mission is to provide food and other resources to people in need and to pursue areas of common interest for the benefit of people in need. Last year, the association and its statewide hunger relief network distributed 186 million pounds of food – or about 155 million meals – feeding more than 2 million low-income Ohioans – 1 in 6 of our friends and neighbors.

The households served by the association’s network represent a diversity of circumstances and challenges. Clients face a wide array of obstacles to food security, such as health issues, education levels, housing instability, unemployment/underemployment, disabilities and insufficient income and resources. The Hunger in Ohio 2014 study found that 83 percent of the association’s client households are food insecure, meaning that they were without reliable access to a sufficient quantity of affordable, nutritious food at some point during the year. Majorities, 71 percent, of our clients are living in households with annual income at or below the federal poverty level, and most, despite their size, have annual household incomes of less than $20,000 a year.

The association recognizes that hunger is merely a symptom of poverty and engages in other efforts to eradicate poverty and hunger, including serving as the home of The Ohio Benefit Bank™ an innovative online service that began in 2006, which connects low-income Ohioans with more than 20 work support programs, food assistance, health care, educational and tax credits through a single, easy-to-use platform. We also operate Ohio’s largest federal navigator program for the Affordable Care Act. For more than 20 years, we have advocated for equitable public policy at the state and federal levels to decrease hunger in Ohio. We work with local, regional, and national partners to inform policymakers, media, and other stakeholders about the issues facing Ohio’s families.

The Ohio Benefit Bank (OBB™) is rooted in the association’s commitment to expanding access to federal nutrition programs like the Supplemental Nutrition Assistance Program (SNAP) also known as food stamps and other important federal work support programs and tax credits. It is implemented through a partnership with the State of Ohio, four federal agencies, nine state agencies, and about 1,300 faith-based and community organizations operated by more than 5,700 trained volunteer counselors that serve as access points for low-income Ohioans. The OBB is available for any organization in Ohio to use for free to enhance the services it offers to its clients.
Knowing first-hand that hunger and health are directly linked, the association partners with the Ohio Department of Job and Family Services and the USDA Food and Nutrition Service as the state’s SNAP outreach grantee. The association and our member foodbanks administer and conduct outreach and education on this critical food assistance program. We work on the front lines – reaching hungry Ohioans where they work, live, pray, play and learn.

SNAP is the first line of defense against hunger in our state and nation – the benefits, which are 100% federally funded - are modest - representing on average $126.52 (December 2014) per person, per month. Benefits are limited to a person with net income at or below 100% FPL (monthly income of no more than $973 per month for a household of one and $1,311 for a household of two people).

To get SNAP benefits, households must meet certain tests, including resource and income tests. The program also has work and work registration requirements for everyone 16 to 60 years of age.

**SNAP Employment Requirements**

Adults without children who do not also have a diagnosed disability between 18 and 50 years old can get SNAP benefits for only 3 months in a 36-month period if they do not work or participate in a workfare or employment and training program other than job search. In 2014, this requirement was waived in 16 of Ohio’s 88 counties and 17 counties in 2015.

With some exceptions adults between 16 and 60 must register for work, accept suitable employment, and take part in an employment and training program to which they are referred by the local office. Failure to comply with these requirements can result in disqualification from the program.\(^i\)

**What impact have these cuts and changes had on the emergency hunger relief network in Ohio?**

The *Losing Ground* research brief, available at our website,\(^iii\) compiles data from several studies and sources to provide an overview of the continuing prevalence of hunger and food insecurity confronting individuals and families throughout our state, and the challenges facing Ohio’s hunger relief network in meeting the need.

All SNAP recipients in Ohio and across the nation saw reductions in their benefits beginning November 1, 2013, when Congress prematurely ended a modest increase to SNAP benefits made as part of the 2009 American Recovery and Reinvestment Act.\(^1\) In Ohio, this deeply affected the 44 percent of households receiving SNAP that include children, the over 15 percent of households that include someone who is elderly, and the nearly 29 percent of households that include someone who is nonelderly and disabled.\(^iv\)
About 1.8 million Ohioans were receiving federal SNAP/food stamp benefits in October 2013.v (As of December 2014 enrollment had declined to 1,710,141).vi Across-the-board cuts to food assistance benefits went into effect beginning November 1, 2013, leading to an estimated loss of about $29 per month in benefits for a household of three. Compounding this loss in federal benefits, the State of Ohio chose to pass up a statewide federal waiver offered by the United States Department of Agriculture beginning January 1, 2014. The waiver would have allowed unemployed, able-bodied, childless adults between 18 and 50 years of age to continue to receive modest SNAP benefits—100 percent federally-funded benefits—while seeking employment. This waiver had been in place in Ohio since mid-2000, when the Ohio General Assembly enacted legislation to compel the State of Ohio to apply and implement it.

Waivers are available when unemployment rates and labor surpluses climb, and, in spite of continued eligibility for the waiver given the state’s economic climate, an estimated 134,000 vulnerable Ohioans are now subject to the work requirement. Unless they can secure at least 20 hours a week of paid employment or access one of a very limited number of volunteer work experience opportunities, their access to SNAP/food stamps is limited to three months of every 36-month period.

Over the past 14 months, these combined cuts and changes have totaled $331.5 million in lost federal food assistance benefits—a loss of over 235.8 million meals for low-income Ohioans—which is more than the Ohio Association of Foodbanks network distributes in a year.

A Comprehensive Assessment of Able-Bodied Adults without Dependents and Their Participation in the Work Experience Program in Franklin County, Ohio.vii


Franklin County was one of the 72 Ohio counties that did not receive a waiver to exempt Able-Bodied Adults Without Dependents (ABAWD) receiving benefits through the Supplemental Nutrition Assistance Program (SNAP) from participating in the federal work requirement to ensure they are able to maintain their food assistance benefits.

The Work Experience Program (WEP) began at the Ohio Association of Foodbanks in December of 2013 and expanded quickly to accommodate the increasing number of ABAWD referrals. Hundreds of ABAWDs meet with an Ohio Association of Foodbanks WEP Assessment Specialist each month to complete a comprehensive assessment at their local FCDJFS Opportunity Center. Clients are then required to attend one three-part clinic to receive a FBI/BCI background check and are offered a variety of valuable job related opportunities. After clients complete the assessment and have attended the clinics, they are placed at a qualified partner organization to complete their monthly work requirement
which allows them to maintain their SNAP benefit eligibility for the duration of their participation.

Our interest in the ABAWD population does not end when they exit our program. We are concerned about the well-being and long term outcomes of our clients. We conducted a post-WEP client study to examine the course of clients after they have exited the program. The findings of this report provide information about post-participation employment status and the most common causes of failure to comply with FCDJFS mandated WEP involvement. One of our many goals in hosting WEP is to assist ABAWDs with finding sustainable employment to become economically self-sufficient.

To do that we needed to understand the barriers and challenges these Ohioans already face.

During the pilot period from December 10, 2013 through February 23, 2015, WEP Assessment Specialists were able to complete 4,145 ABAWD assessments.

The following data reflects who our clients are, their background, and their job skills. Our findings include undiagnosed mental and physical disabilities, inadequate access to transportation, previous encounters with the criminal justice system, previous work experience and training, differing levels of education, veteran status, participation in other government programs (Medicaid, SSI/SSDI, and unemployment compensation), knowledge of and registration with Ohio Means Jobs, and caregiver or non-custodial parent status.

**Age and Gender**
While collecting demographics on the basis of gender we noticed that a disproportionate amount of ABAWDs are male.

- 38 % are female
- 62% are male
- Average age is 34
- 22% are between the ages of 18 and 24

**Dependents and Caregiver Status**
According to the USDA definition of an ABAWD, it is assumed that all clients do not have dependents.

- 24.4% of clients reported having children not in their custody.
- 17.7% disclosed that they owe child support.
- 1.9% of clients who responded also reported they need childcare.

Having the status of caregiver to a relative should potentially exempt an individual from participating in WEP. Caregivers can often replace the services of a Medicaid or Medicare home- healthcare provider. Caring for children is not the only form of dependent care examined.

- 13% of clients are caregivers for a parent, relative, or friend
Able-Bodied—the Medicaid expansion population
To evaluate the abilities of clients both mentally and physically, clients are asked if they are disabled, or if they have any physical or mental limitations we should know about. If they indicate they suffer from any physical or mental health condition they are then asked if the limitations affect their ability to work.

- 30.8% of clients reported they have a physical or mental health limitation.
- 17.8% of clients reported that they had filed for Supplemental Security Income (SSI), or Social Security Disability Insurance (SSDI).viii

Clients who self-report they are disabled with a physical or mental condition that renders them unable to work may need more outreach and supportive services to complete an application for SSI or SSDI.

- Just over half of the clients (54 percent) have applied for Medicaid, although all qualify for recently expanded necessary health coverage due to their low-income status.

This potentially shows why so few clients are under a doctor’s care (21.3 percent), and only 24.9 percent of clients are on medication. Many clients explicitly report not taking medication because they are unable to afford the medication they have been prescribed.

Most common mental health limitations reported:
- 13.7% other, (multiple mental/physical limitations)
- 4.2% depression
- 3.5% bipolar disorder
- 2.9% anxiety
- 1.5% learning and mental disabilities
- 1.3% Post Traumatic Stress Disorder (PTSD)
- 5.5% other, including schizophrenia and addiction

Most common physical health limitations reported:
- 7.7% problems with standing and heavy lifting
- 5.9% back problems and back pain
- 5.3% leg problems including severe pain
- 2.5% breathing problems such as asthma or COPD
- 1.5% high blood pressure
- 1.5% diabetes
- 8.2% of clients requested special accommodations which included requests for work assignments that require no heavy lifting, or no standing/walking for long periods of time.
Education

While the unemployment rate in Ohio is declining, clients in this population may not meet the educational standards for the jobs becoming available. Analyzing the statistics we have collected on education, we find how limited the prospects are for clients to enter the workforce in a position that will pay a sustainable living wage.

- 30% of clients have no high school diploma or GED.
- Although 68.5% of clients have graduated from high school or have earned a GED, only 38.1% have attended college.
- A very small portion of clients (10.5 percent) who have attended college went on to earn a degree.
- Observations and Experiences: In speaking with clients during assessments we have noticed some clients appear marginally and functionally illiterate. This prompts a deeper examination of social promotion policies that may exist in schools, and inquiry about undiagnosed learning disorders, mental disabilities, and autism.

Criminal History

As part of the assessment clients are asked if they are willing to complete an FBI/BCI background check. An overwhelming 98.6% of clients agree to comply with this request. Clients who declined a background check do not qualify to participate in WEP with the Ohio Association of Foodbanks. Domestic violence can happen in any household regardless of socioeconomic status, race, age or any other demographically defining factor. Studies show that domestic violence is three times as likely to occur when couples are experiencing financial strain.\(^{ix}\)

- 11.1% of clients assessed reported having domestic violence charges.

A history of criminal activity or previous incarceration can have a tremendously negative impact on someone. They miss out on many opportunities, job related or otherwise. The stigma of a felony conviction can follow someone for a lifetime, even if their release is meant to suggest that they have been rehabilitated.

- 35.3% of the clients in our program have felony convictions; some clients have multiple felonies, or a combination of felonies and misdemeanors.
- 12.1% of clients are on probation or parole which means they may not qualify for services offered through legal aid, such as record sealing.

A recent report from the Kirwan Institute found that 1 in 4 people incarcerated in the State of Ohio were between

Client Story: At 15 years old, David was sentenced to 15 years in prison. Now, at 30 he has been released and is eager to start his life over. He was nervous during the assessment, but I was able to get him to relax as he told his story. Later, he called our office to thank me for being so sweet during the assessment and for also believing in him. He was thrilled to tell me that he learned to drive and is now enrolled at Columbus State Community College.
the ages 18 to 24. The incarcerated population from the 18 to 24 age group in Ohio has grown nearly 70% in recent years. Prison intake data from Franklin County indicate that the median age of first arrest for those entering the state correctional system in 2012 was 19 years old.

**Communication**

Maintaining a reliable form of communication with clients has proven to be a massive challenge. While clients offer contact information, they rarely respond to communications.

- 95.3% of clients reported having phone numbers this does not mean that they have continuous access to a phone;
- 89.2% of clients reported having mailing addresses, but many of them are in short-term housing situations.
- 37.5% of clients reported having an email address.

**Transportation**

Clients are supposed to receive a monthly travel stipend from their FCDJFS caseworker. Many clients report that they have not received the stipend. This could be due to an inaccurate mailing address, the inability to contact their caseworker, or a delay in dispersing of funds. Some clients report that the travel stipend is not enough to cover travel to and from work sites. Some clients do not have bank accounts and have to pay a service fee to cash the check they receive from FCDJFS, leaving an insufficient amount to purchase a monthly bus pass which the stipend should cover.

- 56% of clients report they have reliable access to transportation. This can be a personal vehicle, public transit, or utilizing friends and family members for transportation.
- 38.8% of clients have a valid driver’s license, which indicates that clients are either using public transportation or are driving without a license. Some clients may not be able to obtain a driver’s license if they owe child support and have had their driving privileges suspended, or if they have outstanding tickets or unpaid fines which they may be unable to resolve with their limited income.
- 17.5% of clients report having car insurance, inferring that some are driving without insurance which can be attributed to a variety of factors, including affordability.
- 72% of clients report they live near a bus stop, which leaves
- 28% in a tough situation if they do not have reliable transportation to their work site.

Having a DUI/OVI on an individual’s driving record can affect their ability to obtain employment or housing, it can result in higher car insurance which they may be unable to afford, or loss of driving privileges.

- 14.6% of clients report they have been documented as *Driving Under the Influence* (DUI) or *Operating a Vehicle Impaired* (OVI).
Forms of Identification
To apply for jobs, housing, government benefits, vote, or obtain a driver’s license most agencies usually require two forms of Identification (ID).
- 71.1% of clients report having a state ID,
- 90.2% of clients report having a social security card, and
- 81.4% of clients report having a birth certificate.

Employment & Job Seeking Needs
Working 20 or more hours of paid employment per week, every week, can exempt an ABAWD from participating in WEP. Many clients were unable to identify how many hours they work per week because they are employed through a temporary employment agency (including day labor and labor pool agencies), which means clients may not have consistent work on a weekly basis.
- 10.6% of clients are currently working
- 10.3% of clients reported working in-kind for rent or housing,
- 24.4% reported they had been dismissed or fired from a job.

A recipient of unemployment compensation benefits is exempt from fulfilling the work requirement.
- 78.5% of clients have never been eligible for unemployment compensation benefits.

On average, a client’s last year of employment was 2014. 94.4% of clients listed their job skills and training in the following fields:
- 32.6% Warehouse work
- 20.7% Customer service
- 18.9% Fast food/restaurants
- 15% Cooking and food preparation
- 14.7% Janitorial and cleaning
- 13.2% Computer skill
- 10.1% Construction/building
- 9.6% Office/clerical work
- 9.5% Landscaping/lawn care
- 9.4% Cashier
- 8.6% Retail/sales
- 7.7% Healthcare [nurse, aide, etc…]
- 7.6% Forklift operation
- 7.2% Pick & Pack
- 6.2% Management

Ohio Means Jobs Registration
In an effort to offer more job seeking resources to clients, they are referred to Ohio Means Jobs (www.ohiomeansjobs.com). When asked if clients were already registered with Ohio
Means Jobs 74.1% reported they were not registered, and most clients reported they have never heard of the website.

Additional Barriers
To ensure a client is able to perform the duties assigned to them, we inquire about any supportive services they may need to successfully complete their work assignment. Over 15.8% of clients report needing supportive services. The most common services requested were language interpretation (especially for Somali refugees) and help with transportation.

Clients experiencing homelessness, health problems, language barriers and a lack of stable employment to fit their skill set make up nearly 12.7% of clients who reported other barriers standing in the way of employment.

2014 Post-WEP Client Survey Findings
In an effort to learn more about the outcomes of clients after they exit WEP, we conducted a comprehensive study to examine program effectiveness, job prospects, income, and food access. The findings of this study have helped us to better understand our program from a client perspective, the effects of this program on clients who exited due to noncompliance and lost their benefits, and the type of jobs an ABAWD can expect to find in Franklin County.

Over 900 former clients were contacted, but only 247 clients elected to participate in the full survey.

When asked why a client exited WEP, the most common responses were:

- 44.1% Failed to Complete Hours (Sanctioned)
- 25.1% Found Employment
- 23.1% Miscommunication with the Ohio Association of Foodbanks
- 21.1% Found to be Exempt
- 17% Miscommunication with Caseworker
- 11.3% Transportation Stipend Not Received
- 11.3% Difficulty with Transportation (Unrelated to Transportation Stipend)
- 8.5% Time Barrier
- 8.5% Miscommunication with Host Site
- 4.5% No Desire to Continue Participation

Found to be Exempt
Clients were given the option to offer multiple answers to this question, on average clients gave for exiting WEP. Clients who indicated that they were found to be exempt gave the following reasons for exemptions:

- 38.5% Physical Disability
- 25% Employment 20+ Hours per Week
- 9.6% Mental Disability
- 9.6% In-Kind Work 20+ Hours per Week
• 5.8% Responsible for Dependent

**Found Employment** - 1 in 4 WEP participants listed “Found Employment” as their reason for exiting the program, the highest percentage listed aside from not completing hours. Some clients have had help finding employment through WEP workforce development partners; others have found employment on their own.

1 in 3 clients reported having taxable employment from February to August. The average length of employment reported by the 86 clients who answered positively to this question was 79 days (11.3 weeks). The average hourly wage reported was $10.23. The average number of hours worked per week was 29.49 hours. This means the average number of dollars generated per employed individual over the seven month period was $3,409.01. It is estimated that clients generated close to $ 293,175 during this time period.

Of the 86 clients who reported some kind of employment, the following were the most common occupations reported:

• 4.9% Warehouse
• 4.5% Temp Agency
• 4.5% Fast Food/Restaurant
• 2.8% Retail/Sales
• 1.6% Shipping & Receiving
• 1.2% Landscaping
• 1.2% Elderly Care
• 1.2% Cooking/Food Prep
• 1.2% Automotive
• 0.8% Office Clerical
• 0.8% Hotel/Hospitality

**Churn Rate**
When a client is no longer a participant in WEP due to a sanction, they may need to have a state hearing to overturn their sanction. Nearly 66% of clients reported taking this step to overturn their sanction, or reapplied for food assistance in another way after exiting WEP. It is estimated that there is a 3-month churn window, which is the average amount of time it takes for WEP participants to reenter SNAP after exiting the program.

The amount of churn generated by the most common causes of noncompliance creates increased work as an average 2 out of every 3 participants, including those who identified some form of employment, must restart the entire process by reapplying through their case worker for SNAP benefits.
Food Sources

If a client is not receiving food assistance due to a loss of SNAP benefits, they look for food elsewhere. When asked, “How are you providing food for yourself in the absence of food benefits,” clients gave multiple answers to the question:

- 81% Food Pantry
- 80% Family Support
- 18.1% Asking (Getting Food from Strangers, Panhandling, Dumpster Diving, etc.)
- 18.1% Soup Kitchen/Meal Line
- 10.5% Homeless Shelter
- 10.5% Church

In closing, the Ohio Association of Foodbanks provides the following recommendations which are supported by the findings of this Work Experience Program operation, assessments and the post-program client survey. While the association applauds the concept of Person-Centered Case Management, it is imperative that we first understand the barriers and challenges faced by this population. Long lasting solutions and interventions must be based in fact, not fiction, and must include substantial and flexible resources to first address the basic needs, for food, shelter, transportation, education and health.

**We strongly encourage the members of this committee to:**

- Prioritize all Food Assistance Employment and Training funding to serve this population.
- Provide an additional $10 million per year to support ODJFS Food Assistance Employment and Training.
- Provide the County Job & Family Services with the ability to utilize the free 400,000 banked months of exemptions to reenroll able-bodied adults without dependents in the SNAP program.
- Ensure all newly Medicaid eligible recipients with incomes at or below 100% of the federal poverty level are enrolled in SNAP.
- Provide funding to pilot this program with other Departments of Job and Family Services statewide in an effort to replicate the positive results we have seen in Franklin County, to expand this program to other metro and rural areas.

**Provide Additional Funding to Organizations Supporting WEP**

- Provide additional funding to the Ohio Association of Foodbank’s state funded food programs of $5.5 million per year. According to the findings in our post-program client
survey, over 80% of former WEP participants are utilizing the services of their local emergency food programs.

- Provide additional funding to the Ohio Association of Foodbanks to support the cost of emergency vouchers for transportation, travel vouchers and basic needs.

- To increase interest in becoming a part of the host-site network, there needs to be more incentive for organizations to serve ABAWDs through WEP. By offering operating support to the non-profit and faith-based organizations that are providing WEP services and slots we can motivate more sites to partner, while current sites may be able to effectively increase their capacity to serve more ABAWDs.

- Provide supplemental support for the continuation, expansion and analysis of YouthCorps, a program of the Ohio Association of Foodbanks for Young Adults Aging out of the Foster Care System. All youth who have successfully completed this program were either enrolled in school or working, which exempts from participating in WEP as ABAWDs.

- Improve the funding and training of a specialized unit dedicated to the implementation of this work requirement and the ABAWD population’s specific needs.

**Increase Oversight to Improve Effectiveness**

- Analyze the expenditures of Workforce Development Programs funded by ODJFS compared to outcomes. WEP at the Ohio Association of Foodbanks has proven a 24% success rate, compared to a 16% success rate of similar government funded workforce programs in Franklin County.

**Provide more work support opportunities for ABAWDs**

- Expand enrollment, participation, and successful completion of nationally certified programs such as the FastPath program at Columbus State Community College, including ServSafe, customer service, advanced logistics, and STNA.

- Create an employment enterprise or pipeline into strategic aspects of the job market. This will help harder to employ individuals find opportunities to gain sustainable employment.

- Prioritize Workforce Investment Act funding to provide education, training, and supportive services to ensure a seamless delivery of services.
- Establish a relationship with the Ohio Department of Reentry, Rehabilitation, and Corrections in order to address the specific concerns of the employer community in regards to the future employment of felons.

- Examine opportunities to secure additional USDA/SNAP Employment and Training funds to enhance service delivery.

**Study the social and economic impacts of WEP**

- Monitor and report on the impacts to well-being, health and safety of clients, WEP host-site staff/volunteers and the community at-large.

- Conduct an Economic Impact Analysis on the loss of food assistance/SNAP benefit issuance on the Franklin County economy.

- Provide funding for comprehensive case-management, longitudinal tracking of employment, wages, public assistance participation, and well-being of the ABAWD population.

**Examine and Evaluate the Needs of Special Populations**

- Provide support and funding for a study on the mental and physical health status and outcomes of the ABAWD population and their utilization of Medicaid.

- Fund person-centered community-based case management of ABAWD applying for SSI/SSDI, and supportive services including Legal Aid Assistance to non-custodial parents and individuals with criminal charges and felony convictions.

- Convene a study group to examine the impact of temporary and day labor employment services and its effects on this population.

- The Ohio Association of Foodbanks will continue to analyze assessments and data including current and previous encounters with the criminal justice system, community impact and these associated cost.

Thank you in advance for your attention to this matter. I would be pleased to answer any questions you may have at this time.
History of ABAWD provisions in 1996 welfare reform

Under the 1996 welfare law, adults aged 18-49 who are not physically or mentally unfit for work or caring for a minor child are inelgible for SNAP if they have received three months of SNAP benefits while unemployed during the previous 36 months. Months of SNAP receipt don’t count toward the limit if the individual is working at least half-time, participating in qualifying work or training program activities for at least 20 hours a week, or living in an area with high unemployment where the three-month limit is temporarily waived. When signing the welfare law in 1996, President Clinton singled out this as one of the bill’s most harmful provisions and called for it to be substantially changed.[1]

End notes:


http://www.fns.usda.gov/snap/eligibility

http://ohiofoodbanks.org/docs/publications/losing_ground.pdf


After September 9, 2014 we began screening self-reported disabled clients if they were able to work and earn more than $1010 per month. This question identifies whether the client could potentially qualify for SSI/SSDI. The earned income amount determined by the Social Security Administration’s definition of a substantial gainful activity, which could disqualify a person from being considered disabled for the purposes of SSI/SSDI.