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**Testimony of Jen Jenkins  
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Legal Aid DC**

**Before the Committee on Human Services  
Council of the District of Columbia**

**Public Hearing Regarding:  
“Green Workforce Pilot Amendment Act of 2026”**

**October 22, 2026**

Legal Aid DC<sup>1</sup> appreciates the opportunity to testify in support of B26-0808, the *Green Workforce Pilot Amendment Act of 2026*. Legal Aid DC serves thousands of clients each year, many of whom seek or receive public benefits, including Temporary Assistance for Needy Families (TANF) and the Supplemental Nutrition Assistance Program (SNAP). Our clients are directly affected by new federally imposed work requirements that threaten access to these vital safety net programs.

In response to the anticipated harm of federal cuts to the safety net under H.R. 1, this legislation would establish a pilot program through the Department of Human Services’ (DHS) Temporary Assistance for Needy Families Employment and Education Program (TEP). The pilot would provide up to 250 participants at a time with employment opportunities in public and private sector roles that support environmental sustainability. Participation would be limited to individuals who are not meeting SNAP or Medicaid work requirements. This pilot is an important step toward helping low-income District residents access employment opportunities that allow them to meet new federal work requirements while maintaining access to essential public benefits.

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<sup>1</sup> Legal Aid DC is the oldest and largest general civil legal services program in the District of Columbia. The largest part of our work is comprised of individual representation in housing, domestic violence/family, public benefits, and consumer law. We also work on immigration law matters and help individuals with the collateral consequences of their involvement with the criminal legal system. From the experiences of our clients, we identify opportunities for court and law reform, public policy advocacy, and systemic litigation. For more information, visit [www.LegalAidDC.org](http://www.LegalAidDC.org).

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## **Expand the Green Workforce Pilot to Meet Residents' Need**

The bill proposes a maximum of 250 participants at a time in the pilot program. Legal Aid DC urges the Committee to consider expanding the pilot's capacity to reflect the significant need among District residents who will be affected by the new federal work requirements. The Committee should also consider clarifying how DHS will select participants for the program outside of the stated eligibility of not meeting SNAP and Medicaid work requirements.

According to the DC Fiscal Policy Institute, as of July 5, 2026, DHS had screened 4,827 SNAP applicants and recipients to determine their status under the Able-Bodied Adults Without Dependents (ABAWD) rules and whether they qualified for an exemption. Of the 1,371 individuals identified as ABAWDs who did not receive an exemption, 1,210 were not meeting the applicable work requirements and had begun their three-month time limit. Of those 1,210 individuals, 418 (35 percent) were in their second month, while 788 (65 percent) were in their first month.<sup>2</sup>

Under federal law and DHS guidance, individuals subject to the ABAWD time limit who do not meet the applicable work requirements or qualify for an exemption generally cannot receive SNAP benefits for more than three countable months during the fixed 36-month period from June 1, 2026, through May 31, 2029.<sup>3</sup> These numbers demonstrate the urgent need for accessible employment opportunities that can help District residents meet the work requirements and access to food assistance.

A pilot capped at 250 participants may leave many residents without access to the employment opportunities they need. Legal Aid DC urges the Committee to expand the program's capacity so that it can reach more District residents facing the loss of essential benefits. The pilot should be scaled to meet the demonstrated need rather than limit assistance to a small fraction of potentially affected residents.

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<sup>2</sup> Maria Manansala, DC Fiscal Policy Institute, Federal SNAP Changes are Putting DC Residents' Food Assistance at Risk (Aug. 27, 2026), <https://dcfpi.org/all/federal-snap-changes-are-putting-dc-residents-food-assistance-at-risk/>.

<sup>3</sup> See Dep't of Human Services, SNAP Work Requirements, <https://dhs.dc.gov/page/snap-work-requirements>.

## **Establish a Clear and Earlier Start Date for the Pilot and its Participants**

Legal Aid DC also urges the Committee to establish a firm start date and participant eligibility date for the pilot program. We recommend that the pilot begin, and participants become eligible, by October 1, 2027, at the latest.

Currently, the bill does not establish a clear date by which the pilot itself must begin operating, and it requires participants to join the program by April 1, 2028. Without a defined launch date and earlier eligibility date, potential participants may face uncertainty about when they can access employment opportunities and whether those opportunities will be available before they lose benefits.

The timing is particularly important given the implementation of the new federal work requirements under H.R.1. SNAP ABAWD work requirements took effect in June 2026, and Medicaid work requirements are scheduled to take effect in January 2027. District residents who are subject to these requirements need timely access to employment opportunities that can help them comply. Establishing a firm start date for the program itself and moving up the timeline on eligibility would provide greater predictability for potential participants and help ensure that the pilot responds to residents' needs before they experience an interruption in essential benefits.

## **Conclusion**

Legal Aid DC supports *Green Workforce Pilot Amendment Act of 2026* as an important opportunity to connect District residents with environmentally beneficial employment opportunities to ameliorate the harms of the new federal work requirements. To maximize the bill's impact, we urge the Committee to expand the pilot's participant capacity, move up the eligibility timeline, and establish a firm launch date. These changes would help ensure that the pilot is more responsive to the food assistance needs among low-income District residents.