



Food and
Nutrition
Service

Park Office
Center

3101 Park
Center Drive
Alexandria
VA 22302

DATE: December 27, 2016

SUBJECT: Clarification on Characteristics of Broad-Based Categorical Eligibility Programs

TO: Regional Directors
Supplemental Nutrition Assistance Program
All Regions

FROM: Lizbeth Silbermann
Director, Program Development Division
Supplemental Nutrition Assistance Program

Broad-Based Categorical Eligibility (BBCE) is a complex area of Supplemental Nutrition Assistance Program (SNAP) policy and the number of States using BBCE has grown since the Food and Nutrition Service (FNS) last issued guidance on this topic. Given the nuances of this option and the dynamic nature of State operational policies and practices, FNS recognizes the potential for misapplication of policy as local programs adapt to changing circumstances. FNS is issuing this memorandum in an effort to clarify the characteristics of BBCE programs and the actions States must take to ensure compliance with statutory and regulatory requirements.

This policy memorandum reiterates policies outlined in earlier policy memoranda, most directly those issued on September 30, 2009, January 26, 2010, and January 31, 2011. This policy memorandum is not applicable to traditional cash categorical eligibility programs, it is only applicable to BBCE.

BBCE shall only be conferred to SNAP households who have received or were authorized to receive non-cash benefits or services from a Temporary Assistance for Needy Families (TANF) or State Maintenance of Effort (MOE) program that meets SNAP statutory and regulatory requirements. To this end, FNS would like to direct State agencies' attention to the following regulatory requirements, which are discussed in greater detail in the Questions and Answers Section.

- The TANF/MOE program that confers eligibility for SNAP must meet one of the four TANF block grant goals. A program meeting goals three and four must have a gross income test of no more than 200 percent of the Federal Poverty Guidelines (FPG).
- If the TANF/MOE program is less than 50 percent funded by TANF/MOE funds, the State must report to FNS the program it is using in order for that program to confer eligibility for SNAP.

- The TANF/MOE program that confers eligibility for SNAP must be a TANF/MOE program used to provide a non-cash benefit or service. The State agency must ensure that a household receives or is authorized to receive a non-cash benefit or service if it meets the program's eligibility criteria.
- The TANF/MOE program conferring eligibility must assess and verify the applicant's information against its own eligibility standards in accordance with applicable laws and Federal regulations.
- BBCE shall only be conferred to SNAP households who have been determined eligible for the TANF/MOE program and notified of that determination (i.e. receive or be authorized to receive the non-cash TANF/MOE benefit or service that confers eligibility).
- It is the responsibility of the State agency to verify information needed to determine benefit levels regardless of the TANF/MOE program used to confer eligibility.

State agencies should review BBCE statutory and regulatory requirements in order to ensure that the TANF/MOE programs conferring eligibility in their State are consistent with SNAP regulations. The following Questions and Answers Section may be helpful to State agencies in this review.

If you have any questions, please contact Leigh Gantner at leigh.gantner@fns.usda.gov.

/s/ Original signed on file

Lizbeth Silbermann
Director
Program Development Division

Attachment

Questions and Answers

What is broad-based categorical eligibility (BBCE)?

BBCE is a policy that makes households categorically eligible for SNAP because they receive or are authorized to receive non-cash TANF/MOE funded benefits or services.

SNAP applicants found eligible for these non-cash TANF/MOE programs have certain eligibility factors deemed for the purposes of the SNAP eligibility determination. While a household may be found eligible through BBCE, the household must still qualify for a benefit in order to receive a SNAP allotment.

What types of programs can confer BBCE?

Non-cash TANF/MOE programs that confer BBCE must meet one of the four goals of the TANF Block Grant:

1. Assisting needy families so that children can be cared for in their own homes.
2. Reducing the dependency of needy parents by promoting job preparation, work, and marriage.
3. Preventing out-of-wedlock pregnancies.
4. Encouraging the formation and maintenance of two-parent families.

TANF/MOE programs that confer eligibility for SNAP have different characteristics depending on which of the TANF Block Grant goals the program is fulfilling.

Since goals one and two explicitly discuss serving “needy” families, SNAP regulations do not place a cap on the gross income limit of the TANF/MOE programs that could be used to confer eligibility, assuming they will serve low-income households. However, TANF/MOE programs used to confer SNAP eligibility meeting goals one or two must serve families. Regulations pertaining to non-cash TANF/MOE programs that meet goals one and two can be found at 7 CFR 273.2(j)(2)(i)(B) and 7 CFR 273.2(j)(2)(ii)(A).

Goals three and four do not explicitly mention income, so SNAP regulations require that TANF/MOE programs used to confer BBCE that further these goals must have a gross income limit of no more than 200 percent of FPG. Regulations pertaining to these programs can be found at 7 CFR 273.2(j)(2)(i)(C) and 7 CFR 273.2(j)(2)(ii)(B).

Does the State agency have to verify eligibility for the TANF/MOE program?

TANF/MOE programs that confer BBCE must include eligibility criteria, and verify applicant's information against these criteria in accordance with applicable Federal laws and regulations. In order for the household to be categorically eligible for SNAP, the TANF/MOE program used to confer BBCE must determine that the household is eligible for services or benefits and notify the household of this determination.

How are programs that confer BBCE implemented in the State?

The design of the TANF/MOE programs conferring eligibility is up to the State agency, provided the programs meet statutory and regulatory requirements. In many cases, State agencies use pamphlets, telephone numbers, or referrals to other programs as the service or benefit conferring eligibility.

The State agency must ensure that the TANF/MOE program that confers eligibility authorizes households to receive a benefit or service. Any concerns or questions that the State agency may have regarding TANF eligibility and verification requirements should be directed to the Department of Health and Human Services (HHS) as the agency responsible for TANF.

When is BBCE conferred?

The household becomes categorically eligible when the household "receives or is authorized to receive" services or benefits from a TANF/MOE program that confers eligibility. "Authorized to receive" means the household has been determined eligible for services or benefits and has been notified of this determination, even if the services or benefits have been authorized but not received, authorized but not accessed, suspended or recouped, or not paid because they are less than a minimum amount. Regulations regarding authorized to receive can be found at 7 CFR 273.2(j)(2)(iv).

Since many State agencies now use integrated eligibility systems to efficiently collect and process information for multiple programs, in practice households may be notified of their eligibility for the TANF/MOE program at the same time they are notified of their SNAP eligibility. The household is, therefore, categorically eligible for SNAP on the certification effective date for the TANF/MOE program. The household also need not receive the TANF/MOE funded service or benefit to be deemed categorically eligible for SNAP.

What are State agency reporting requirements to FNS on BBCE?

It is important to note that how the TANF/MOE program is funded has implications for how BBCE is implemented and State agency reporting requirements to FNS.

If a TANF/MOE program is more than 50 percent funded by TANF or MOE funds, then the State agency is required to deem eligibility for SNAP for those households who meet the eligibility requirements of the TANF/MOE program. This applies to programs furthering any of the goals of the TANF Block Grant. Regulations describing this requirement can be found at 7 CFR 273.2(j)(2)(i)(B) and 7 CFR 273.2(j)(2)(i)(C).

State agencies may, at their option, extend categorical eligibility to TANF/MOE programs that are less than 50 percent funded by TANF or MOE funds. In these cases, if the TANF/MOE program furthers goals one and two of the TANF Block Grant, then the State agency must inform FNS of the TANF/MOE program conferring categorical eligibility. If the TANF/MOE program furthers purposes three and four of the TANF Block Grant, then FNS must approve the program in order for it to be used to confer eligibility. Regulations describing this requirement can be found at 7 CFR 273.2(j)(2)(ii)(A) and 7 CFR 273.2(j)(2)(ii)(B).

What must the State agency document in the SNAP case file?

The State agency must document in the case file that the household was found categorically eligible. The State agency is not required to document that it provided the TANF/ MOE funded service or benefit.

What eligibility factors does SNAP deem under BBCE?

The eligibility factors that are deemed for the purposes of SNAP because of categorical eligibility status are resources, gross and net income limits, social security number, sponsored alien information, and residency of the applicant, as described in 7 CFR 273.2(j)(2)(v). The State agency must collect and verify factors relating to benefit determination that are not collected and verified by the TANF/MOE program if these factors are required to be verified according to the regulations in 7 CFR 273.2(f).

In a State with Simplified Reporting, when must the household report changes in their income?

The SNAP reporting requirements under Simplified Reporting apply regardless of categorical eligibility. Sections 6(c)(1)(D)(ii) and 5(c)(2) of the Food and Nutrition Act of 2008 require households to report if their gross income goes above 130 of the Federal Poverty Guidelines (FPG). Therefore, if a household is certified for SNAP with a gross income below 130 percent of the FPG, and that household's income goes above 130 percent FPG, then that household is required to report the change.

There are no statutory or regulatory provisions that require Simplified Reporting households certified above 130 percent of FPG to report income changes. Therefore, State agencies that have BBCE and certify households with gross income above 130 percent of the FPG have discretion as to whether or how many times a household must report a change in income.

In addition to the above SNAP reporting requirements, the TANF/MOE program may have its own reporting requirements to which the household must adhere. If the household is no longer eligible for the TANF/MOE program conferring BBCE, then the household will lose its categorical eligibility for SNAP. Whenever a household is no longer eligible for the TANF/MOE program conferring categorical eligibility, the State agency must reassess the household's SNAP eligibility in accordance with 7 CFR 273.12(f)(3). In practice, State agencies often have shared workers and integrated eligibility systems, so any changes regarding the household's eligibility for the TANF/MOE program and the household's categorical eligibility status for SNAP may be entered simultaneously.

Which households cannot be considered categorically eligible?

Households cannot be categorically eligible for SNAP if:

- Any member of that household is disqualified for an Intentional Program Violation in accordance with 7 CFR 273.16 or for failure to comply with monthly reporting requirements in accordance with 7 CFR 273.21;
- The entire household is disqualified because one or more of its members failed to comply with workfare in accordance with 7 CFR 273.7(m);
- The head of household is disqualified for failure to comply with the work requirements in accordance with 7 CFR 273.7;
- Any member of the household is disqualified under 7 CFR 273.11(m) by virtue of a conviction for a drug related felony.

The above households are subject to all of the SNAP eligibility and benefits provisions, including those found at 7 CFR 273.11(c), and cannot be reinstated on the basis of categorical eligibility provisions. Regulations concerning households that cannot be categorically eligible are found at 7 CFR 273.2(j)(2)(vii) and 7 CFR 273.2(j)(2)(viii).

Who cannot be considered a member of a categorically eligible household?

Categorically eligible households shall not contain the following members:

- An ineligible alien as defined in 7 CFR 273.4;
- A person ineligible under the student provisions in 7 CFR 273.5;
- A SSI recipient in a cash-out State as defined in 7 CFR 273.20;
- A person institutionalized in a non-exempt facility as defined in 7 CFR

273.1(b)(7)(vi);

- A person ineligible for SNAP because of failure to comply with a work requirement of 7 CFR 273.7.

Regulations concerning persons who cannot be members of categorically eligible households are found at 7 CFR 273.2(j)(2)(ix).

How does BBCE affect the Quality Control (QC) review?

The QC reviewer will check that the household was processed as a categorically eligible household, and that the eligibility worker documented categorical eligibility in the case file.

The QC reviewer need not review those elements of eligibility which are deemed by categorical eligibility, i.e., resources, gross and net income limits, social security number, sponsored alien information, and residency. The QC reviewer will also check that only allowable households were categorically eligible for SNAP and that income and resources of ineligible household members were counted in accordance with applicable laws and regulations (see questions above).

The QC reviewer is still required to determine the household's income for the appropriate budget or sample month in order to establish if an accurate amount of benefits was issued to the household.

If the household was not categorically eligible or the State agency failed to document in the case file that the household was categorically eligible, then the QC reviewer will assess the household's eligibility for SNAP against the normal SNAP eligibility provisions. Any resulting errors will be included in the SNAP error rate.



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3101 Park
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22302-1500

SUBJECT: Categorical Eligibility Questions and Answers

TO: Regional Directors
Supplemental Nutrition Assistance Program
All Regions

The attached questions and answers provide guidance on implementing broad-based categorical eligibility. These questions and answers provide additional guidance to the questions and answers released on November 20, 2009.

As explained in previous memos, there are three types of categorical eligibility. Broad-based categorical eligibility refers to the policy that makes most, if not all, households categorically eligible for SNAP because they receive a non-cash TANF/MOE funded benefit or service, such as an informational pamphlet or 800-number. Narrow categorical eligibility describes the policy that makes a smaller number of households categorically eligible for SNAP because they receive a TANF/MOE funded benefit such as child care or counseling. Both narrow and broad-based categorical eligibility are non-cash categorical eligibility. Traditional categorical eligibility refers to the mandatory policy that makes households categorically eligible for SNAP because the household receives TANF, SSI, or general assistance cash benefits.

If you have any questions, please contact Moira Johnston or Sasha Gersten-Paal.

Arthur T. Foley
Director
Program Development Division

Attachment

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Questions and Answers

Question 1: Under regular SNAP rules, households with elderly and disabled members are not subject to the gross income test. How are households with elderly and disabled members treated under broad-based categorical eligibility?

Answer 1: In order to be categorically eligible under broad-based categorical eligibility, households with elderly and disabled members are subject to the gross income limit of the TANF program. Households with elderly and disabled members that do not meet the gross income limit of the TANF program may still apply for SNAP under regular program rules. If the household applies under regular program rules, the household will be subject to the resource limit. State agencies have the option of implementing a TANF program that has a different gross income limit for households with elderly and disabled members. For example, a State agency could set the gross income limit of the TANF program that furthers purposes 3 and 4 at 200% of the Federal Poverty Guidelines (FPG) for elderly and disabled households and 130% for all other households. It would be unusual for a household with gross income in excess of 200% of the FPG to meet the net income test at 100%.

Question 2: Can a State agency impose a net income test in the TANF program it uses to confer broad-based categorical eligibility?

Answer 2: Yes, a State agency may impose a net income test in the TANF program it uses to confer broad-based categorical eligibility as long as it is acceptable under TANF rules. The SNAP regulations do not require State agencies to impose a net income test when implementing broad-based categorical eligibility, nor do they prohibit imposing a net income limit with the TANF program used to confer categorical eligibility. The TANF program used to confer categorical eligibility must have a gross income limit no higher than 200% of the FPG if it furthers purposes 3 and 4 of the TANF block grant.

Question 3: Can a State agency impose a net income limit for SNAP purposes if the TANF program used to confer categorical eligibility does not have a net income limit?

Answer 3: If the TANF program does not have a net income limit, the State agency may not impose a net income limit for SNAP purposes; net income must be deemed for categorically eligible households. The State agency does have the option to deny benefits to categorically eligible households of three or more persons if they do not meet the net income limit. The SNAP regulations (7 CFR 273.10(e)(2)(iii)) allow State agencies to deny or suspend the benefits of households with three or more members who are entitled to no benefits.

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The State agency may deny the household because its net income exceeds the level at which benefits are issued. The State agency may not deny one or two person categorically eligible households because they are entitled to the minimum benefit.

Question 4: Can a State agency require that a categorically eligible household report if its assets exceed the resource limit of the TANF program?

Answer 4: A State agency must deem resources for all categorically eligible households. A State agency may confer broad-based categorical eligibility with a TANF program that requires households to report if their assets exceed the resource limit of the TANF program. In this situation, once a household reports that its assets exceed the resource limit of the TANF program, the household is no longer eligible for the TANF program. If the household is no longer eligible for the TANF program, it is no longer categorically eligible for SNAP.

Question 5: Can a State agency with simplified reporting require a categorically eligible household to report if its income rises above 130% of Federal Poverty Guidelines (FPG)?

Answer 5: The SNAP reporting requirements under Simplified Reporting apply regardless of categorical eligibility. Categorically eligible households with income below the gross income limit must report when their income rises above the gross income limit (130% of FPG). In States with simplified reporting, categorically eligible households with gross income over the gross income limit have no reporting requirements until they recertify or file a periodic report, whichever comes first. States may choose to require these households to report each time their gross income increases over what the household was certified at or when the household's gross income exceeds the income limits of the program that confers categorical eligibility.

Question 6: In States with simplified reporting, do the reporting requirements of the TANF program apply to the categorically eligible household during the SNAP interim report? Can the TANF program require the categorically eligible household to report at any time during the certification period?

Answer 6: FNS cannot issue any guidance on what reporting requirements States may require under the TANF program. Categorically eligible households are subject to any TANF reporting requirements because their SNAP eligibility is contingent on their eligibility for the TANF program. While the TANF reporting requirements need not be the same as the SNAP reporting requirements for a categorically eligible household, the household is no longer categorically eligible for SNAP if it fails to meet a TANF reporting requirement and the household is no longer eligible for the TANF program.

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SUBJECT: Categorical Eligibility Questions and Answers

TO: Regional Directors
Supplemental Nutrition Assistance Program
All Regions

Attached are questions and answers on the implementation of categorical eligibility and the reporting requirements for categorically eligible households. These questions are in response to inquiries from the States.

As explained in previous memos, there are three types of categorical eligibility. *Broad-based categorical eligibility* refers to the policy that makes most, if not all, households categorically eligible for SNAP because they receive a non-cash TANF/MOE funded benefit or service, such as an informational pamphlet or 800-number. *Narrow categorical eligibility* describes the policy that makes a smaller number of households categorically eligible for SNAP because they receive a TANF/MOE funded benefit such as child care or counseling. Both narrow and broad-based categorical eligibility are non-cash categorical eligibility. *Traditional categorical eligibility* refers to the mandatory policy that makes households categorically eligible for SNAP because the household receives TANF, SSI, or general assistance cash benefits.

If you have any questions, please contact Moira Johnston or Sasha Gersten-Paal.


Arthur T. Foley
Director
Program Development Division

Attachment

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Questions and Answers

Implementation of Broad-Based Categorical Eligibility

Question 1: Can States that wish to implement broad-based categorical eligibility still require a resource limit?

Answer1: SNAP law and regulations require States to deem resources for categorically eligible households. However, if the TANF-funded program used to confer categorical eligibility has a resource limit there is in effect a de facto resource limit for SNAP. The State cannot require a resource limit if the program used to confer categorical eligibility does not have a resource limit.

Question 2: When implementing broad-based categorical eligibility, are States able to change both the gross income limit and asset limit? Are States able to change just one limit?

Answer: SNAP regulations require a State to deem gross income and assets for categorically eligible households. Through broad-based categorical eligibility, if the TANF-funded program used to confer categorical eligibility has a gross income limit or asset limit different from the regular SNAP rules there is in effect a de facto gross income and asset limit. The program used to confer categorical eligibility, if it is used to further purposes 3 or 4 of the TANF block grant, can have a gross income limit up to 200% of the Federal Poverty Guidelines and may have an asset limit or may eliminate the asset limit entirely.

Question 3: If a State confers categorical eligibility with a program that furthers TANF purposes 1 or 2, can the State impose a gross income limit?

Answer: The State may confer categorical eligibility with a TANF funded program that furthers purpose 1 or 2 and has a gross income limit, but the State may not impose a gross income limit for SNAP purposes. The TANF program must have the gross income limit. Under categorical eligibility regulations, States must deem the gross income of the TANF program to SNAP. States should note that Purpose 1 and Purpose 2 of the TANF block grant both describe funds spent on *needy families*. Therefore, the TANF program that furthers Purposes 1 or 2 must target needy households with children.

Question 4: May an elderly or disabled household with a gross income limit above the TANF program's gross income limit, be considered categorically eligible and therefore not subject to an asset test?

Answer: No, a household cannot be categorically eligible for SNAP, and therefore not subject to an asset test, if it has a gross income above that of the TANF program.

Question 5: What is the benefit of using a TANF-funded program to confer categorical eligibility that has a gross income limit of 200% of the Federal Poverty Guidelines (FPG), instead of a lower percentage of FPG?

Answer: Families with gross incomes above 130% of FPG could still receive a meaningful SNAP benefit if they have substantial deductions, such as high shelter costs, high medical costs, or high dependent care expenses. For example, a three-person household with a gross income at 150% and high shelter costs (\$1,050/month) would receive \$80 in SNAP benefits. Many households with gross incomes above 165% of FPG may qualify for little or no benefits. For example, the same 3 person household at 165% of FPG with the same shelter costs would receive no SNAP benefits. Households with one or two people will still receive the minimum benefit, unless the TANF program has a net income test at the FPG. States may want to consider using a TANF-funded program that has a limit around 165% to make sure that eligible households receive a meaningful benefit and to reduce the State workload associated with removing those eligible for zero benefits from the SNAP rolls.

Question 6: If a State confers categorical eligibility by providing a brochure funded with TANF/MOE money, is there a requirement regarding how the State has to document that? Does the State need to provide a narrative to show that the eligibility worker gave the household a pamphlet or may a State have its eligibility workers input a code?

Answer: States have discretion regarding how they document that a household is categorically eligible. The case file may provide a narrative to demonstrate that the eligibility worker gave a pamphlet or brochure to a household. Or, the eligibility worker may enter a code to show that he or she gave the pamphlet/brochure.

Disqualification of SNAP Recipients in Categorically Eligible Households

Question 8: If a member of a household becomes a student in an institution of higher learning, can the household maintain categorical eligibility?

Answer: Yes, the household can maintain categorical eligibility because the student is not considered a member of the household.

Question 9: If a member of a household begins receiving SSI benefits in a cash-out State, is the household still categorically eligible for SNAP?

Answer: Yes, the household can maintain categorical eligibility because the SSI recipient in a cash-out State is not considered a member of the household.

Question 10: If a member of a categorically eligible household has an intentional program violation (IPV), can the households maintain categorical eligibility?

Guidance documents lack the force and effect of law, unless expressly authorized by statute or incorporated into a contract. USDA may not cite, use, or rely on any guidance that is not available through their guidance portal, except to establish historical facts.

Answer: Yes, the household can maintain categorical eligibility because the SSI recipient in a cash-out State is not considered a member of the household.

Question 10: If a member of a categorically eligible household has an intentional program violation (IPV), can the households maintain categorical eligibility?

Answer: The entire household is no longer categorically eligible for SNAP. For these households, the non-disqualified members cannot maintain categorical eligibility, but can participate in SNAP if they meet the regular SNAP eligibility requirements. Therefore, the traditional resource and income requirements still apply to the non-disqualified members.

We recognize that this situation can be problematic for States that have implemented broad-based categorical eligibility with a TANF program that has no asset limit. The non-IPV household members will be penalized due to IPV's actions. In addition, in a State that has no asset test due to categorical eligibility, eligibility workers will be unfamiliar with SNAP asset rules. We are considering allowing a waiver that would not disqualify the entire household from being categorically eligible. We would like to emphasize that no household could receive any more benefits under such a waiver than the household would without broad-based categorical eligibility.

Question 11: If a member of a categorically eligible household fails to comply with work registration, job search, voluntary quit, workfare, or monthly reporting requirements, can the household maintain categorical eligibility?

Answer: The entire household is no longer categorically eligible for SNAP. The household members that were not disqualified may still participate in SNAP if they meet the regular SNAP eligibility requirements. The regular SNAP asset and income limits would continue to apply to the non-disqualified members.

We recognize that this situation can be problematic for States that have implemented broad-based categorical eligibility with a TANF program that has no asset limit. The non-disqualified household members will be penalized due to household member's failure to comply with work requirements. In addition, in a State that has no asset test due to categorical eligibility, eligibility workers will be unfamiliar with SNAP asset rules. We are considering a waiver that would not disqualify the entire household from being categorically eligible. We would like to emphasize that no household could receive any more benefits under such a waiver than the household would without broad-based categorical eligibility.

Reporting Requirements for Categorically Eligible Households:

Question 12: In States with simplified reporting, are households categorically eligible for SNAP required to report when their income goes above 130% of FPG? Do States

would require households to report when their income exceeds the income threshold for the TANF program.

In States with simplified reporting, categorically eligible households with gross income over the gross income limit (130% of FPG) have no reporting requirements until they recertify or file a periodic report, whichever comes first. States with simplified reporting can choose to require categorically eligible households to report when their gross income rises above 130% of FPG. States may choose to require categorically eligible households to report each time their gross income increases during the certification or when their gross income exceeds the income limits of the program that confers categorical eligibility.

Question 13: Are States with simplified reporting required to have categorically eligible households report changes to resources?

Answer: Categorically eligible households in States with simplified reporting are not required to report changes in resources. On April 13, 2009, FNS issued a waiver to allow all States with simplified reporting to suspend resource reporting requirements for categorically eligible households.

Question 14: If a categorically eligible household reports going over 130% of FPG, is their categorical eligibility status changed?

Answer: No, categorically eligible households remain categorically eligible unless they become ineligible for the program that originally conferred their categorical eligibility status.

Question 15: If a categorically eligible household loses eligibility for the program that conferred their eligibility for SNAP, is the household still eligible for SNAP?

Answer: The household would lose its categorical eligibility status. The State cannot terminate the household. The State must re-evaluate the household in accordance with regular SNAP program rules. If the household qualifies under the regular program rules, then the household would be able to continue receiving SNAP benefits.

Question 16: May a State with simplified reporting require a categorically eligible household to report when its income exceeds the income limit of the TANF program used to confer broad-based categorical eligibility? May the State make this reporting requirement a TANF reporting requirement? May the State make this reporting requirement a SNAP reporting requirement? Does the State need to inform FNS of the additional reporting requirements?

Answer: Yes, a State with simplified reporting has the discretion to require a categorically eligible household to report when its income exceeds the income limit of the TANF program used to confer categorical eligibility. This would

be a SNAP reporting requirement. When designing the TANF program, the State may require recipients to report when their income exceeds a percentage of FPG. This would be a TANF reporting requirement.

The State must inform FNS if it requires categorically eligible households to report when their income exceeds the income limit of the TANF program used to confer categorical eligibility.

Question 17: How does the State treat a categorically eligible household that fails to report a change that would make the household ineligible for the TANF program that confers categorical eligibility?

Answer: If the State requires a recipient to report a change when an increase in their gross income makes them ineligible for the TANF program, and a household fails to report this change, the State should use the same procedures it would use under the regular SNAP rules when a household fails to report a change.

Additional Questions:

Question 18: Households are categorically eligible for SNAP if they receive or are authorized to receive public assistance, general assistance, or SSI. What does authorized to receive mean?

Answer: Authorized to receive means that an individual has been determined eligible for benefits (e.g. public assistance or SSI) and the individual has been notified of their eligibility. The benefits may have been authorized but not received, authorized but not accessed, suspended or recouped, or not paid because they are less than a minimum amount.

Question 19: How is the participation rate decided if the TANF-funded program used to confer broad-based categorical eligibility has an income limit above 130% of FPG? For example, if the State uses a TANF-funded program to confer categorical eligibility with an income limit of 185% of FPG, are those households between 130% and 185% of FPG, who are now eligible for SNAP but not participating, included in the participation rate?

Answer: Currently, FNS excludes households that are eligible for SNAP because of broad-based categorical eligibility from the participation rate. Therefore, if a State implements broad-based categorical eligibility with a TANF-funded program that has an income limit of 185% of FPG, FNS will exclude households that are between 130% and 185% of FPG from both the numerator and denominator. This method of calculating the participation rate may change.

Question 20: Would the Food and Nutrition Service (FNS) provide States interested in implementing broad-based categorical eligibility, a list of what other States are using to trigger categorical eligibility?

Answer: Yes, FNS will provide interested States with listings of how other States have interpreted broad-based categorical eligibility. Please contact your regional office for more information.



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As explained in previous memos, there are three types of categorical eligibility. *Broad-based categorical eligibility* refers to the policy that makes most, if not all, households categorically eligible for SNAP because they receive non-cash TANF/MOE funded benefit or service, such as an informational pamphlet or 800-number. *Narrow categorical eligibility* describes the policy that makes a smaller number of households categorically eligible for SNAP because they receive a TANF/MOE funded benefit such as child care or counseling. Both narrow and broad-based categorical eligibility are non-cash categorical eligibility. *Traditional categorical eligibility* refers to the mandatory policy that makes households categorically eligible for SNAP because the household receives TANF, SSI, or general assistance cash benefits.

If you have any questions, please contact Moira Johnston or Sasha Gersten-Paal.

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Questions and Answers

Implementation of Broad-Based Categorical Eligibility

Question 1: Can States that wish to implement broad-based categorical eligibility still require a resource limit?

Answer1: SNAP law and regulations require States to deem resources for categorically eligible households. However, if the TANF-funded program used to confer categorical eligibility has a resource limit there is in effect a de facto resource limit for SNAP. The State cannot require a resource limit if the program used to confer categorical eligibility does not have a resource limit.

Question 2: When implementing broad-based categorical eligibility, are States able to change both the gross income limit and asset limit? Are States able to change just one limit?

Answer: SNAP regulations require a State to deem gross income and assets for categorically eligible households. Through broad-based categorical eligibility, if the TANF-funded program used to confer categorical eligibility has a gross income limit or asset limit different from the regular SNAP rules there is in effect a de facto gross income and asset limit. The program used to confer categorical eligibility, if it is used to further purposes 3 or 4 of the TANF block grant, can have a gross income limit up to 200% of the Federal Poverty Guidelines and may have an asset limit or may eliminate the asset limit entirely.

Question 3: If a State confers categorical eligibility with a program that furthers TANF purposes 1 or 2, can the State impose a gross income limit?

Answer: The State may confer categorical eligibility with a TANF funded program that furthers purpose 1 or 2 and has a gross income limit, but the State may not impose a gross income limit for SNAP purposes. The TANF program must have the gross income limit. Under categorical eligibility regulations, States must deem the gross income of the TANF program to SNAP. States should note that Purpose 1 and Purpose 2 of the TANF block grant both describe funds spent on *needy families*. Therefore, the TANF program that furthers Purposes 1 or 2 must target needy households with children.

Question 4: May an elderly or disabled household with a gross income limit above the TANF program's gross income limit, be considered categorically eligible and therefore not subject to an asset test?

Answer: No, a household cannot be categorically eligible for SNAP, and therefore not subject to an asset test, if it has a gross income above that of the TANF program.

Question 5: What is the benefit of using a TANF-funded program to confer categorical eligibility that has a gross income limit of 200% of the Federal Poverty Guidelines (FPG), instead of a lower percentage of FPG?

Answer: Families with gross incomes above 130% of FPG could still receive a meaningful SNAP benefit if they have substantial deductions, such as high shelter costs, high medical costs, or high dependent care expenses. For example, a three-person household with a gross income at 150% and high shelter costs (\$1,050/month) would receive \$80 in SNAP benefits. Many households with gross incomes above 165% of FPG may qualify for little or no benefits. For example, the same 3 person household at 165% of FPG with the same shelter costs would receive no SNAP benefits. Households with one or two people will still receive the minimum benefit, unless the TANF program has a net income test at the FPG. States may want to consider using a TANF-funded program that has a limit around 165% to make sure that eligible households receive a meaningful benefit and to reduce the State workload associated with removing those eligible for zero benefits from the SNAP rolls.

Question 6: If a State confers categorical eligibility by providing a brochure funded with TANF/MOE money, is there a requirement regarding how the State has to document that? Does the State need to provide a narrative to show that the eligibility worker gave the household a pamphlet or may a State have its eligibility workers input a code?

Answer: States have discretion regarding how they document that a household is categorically eligible. The case file may provide a narrative to demonstrate that the eligibility worker gave a pamphlet or brochure to a household. Or, the eligibility worker may enter a code to show that he or she gave the pamphlet/brochure.

Disqualification of SNAP Recipients in Categorically Eligible Households

Question 8: If a member of a household becomes a student in an institution of higher learning, can the household maintain categorical eligibility?

Answer: Yes, the household can maintain categorical eligibility because the student is not considered a member of the household.

Question 9: If a member of a household begins receiving SSI benefits in a cash-out State, is the household still categorically eligible for SNAP?

Answer: Yes, the household can maintain categorical eligibility because the SSI recipient in a cash-out State is not considered a member of the household.

Question 10: If a member of a categorically eligible household has an intentional program violation (IPV), can the households maintain categorical eligibility?

Answer: The entire household is no longer categorically eligible for SNAP. For these households, the non-disqualified members cannot maintain categorical eligibility, but can participate in SNAP if they meet the regular SNAP eligibility requirements. Therefore, the traditional resource and income requirements still apply to the non-disqualified members.

We recognize that this situation can be problematic for States that have implemented broad-based categorical eligibility with a TANF program that has no asset limit. The non-IPV household members will be penalized due to IPV's actions. In addition, in a State that has no asset test due to categorical eligibility, eligibility workers will be unfamiliar with SNAP asset rules. We are considering allowing a waiver that would not disqualify the entire household from being categorically eligible. We would like to emphasize that no household could receive any more benefits under such a waiver than the household would without broad-based categorical eligibility.

Question 11: If a member of a categorically eligible household fails to comply with work registration, job search, voluntary quit, workfare, or monthly reporting requirements, can the household maintain categorical eligibility?

Answer: The entire household is no longer categorically eligible for SNAP. The household members that were not disqualified may still participate in SNAP if they meet the regular SNAP eligibility requirements. The regular SNAP asset and income limits would continue to apply to the non-disqualified members.

We recognize that this situation can be problematic for States that have implemented broad-based categorical eligibility with a TANF program that has no asset limit. The non-disqualified household members will be penalized due to household member's failure to comply with work requirements. In addition, in a State that has no asset test due to categorical eligibility, eligibility workers will be unfamiliar with SNAP asset rules. We are considering a waiver that would not disqualify the entire household from being categorically eligible. We would like to emphasize that no household could receive any more benefits under such a waiver than the household would without broad-based categorical eligibility.

Reporting Requirements for Categorically Eligible Households:

Question 12: In States with simplified reporting, are households categorically eligible for SNAP required to report when their income goes above 130% of FPG? Do States have the ability to require these households to continue to report gross income over 130% of FPG in future months?

Answer: Categorical eligibility does not exonerate reporting requirements. We would expect, however, that the TANF program used to confer categorical eligibility would require households to report when their income exceeds the income threshold for the TANF program.

In States with simplified reporting, categorically eligible households with gross income over the gross income limit (130% of FPG) have no reporting requirements until they recertify or file a periodic report, whichever comes first. States with simplified reporting can choose to require categorically eligible households to report when their gross income rises above 130% of FPG. States may choose to require categorically eligible households to report each time their gross income increases during the certification or when their gross income exceeds the income limits of the program that confers categorical eligibility.

Question 13: Are States with simplified reporting required to have categorically eligible households report changes to resources?

Answer: Categorically eligible households in States with simplified reporting are not required to report changes in resources. On April 13, 2009, FNS issued a waiver to allow all States with simplified reporting to suspend resource reporting requirements for categorically eligible households.

Question 14: If a categorically eligible household reports going over 130% of FPG, is their categorical eligibility status changed?

Answer: No, categorically eligible households remain categorically eligible unless they become ineligible for the program that originally conferred their categorical eligibility status.

Question 15: If a categorically eligible household loses eligibility for the program that conferred their eligibility for SNAP, is the household still eligible for SNAP?

Answer: The household would lose its categorical eligibility status. The State cannot terminate the household. The State must re-evaluate the household in accordance with regular SNAP program rules. If the household qualifies under the regular program rules, then the household would be able to continue receiving SNAP benefits.

Question 16: May a State with simplified reporting require a categorically eligible household to report when its income exceeds the income limit of the TANF program used to confer broad-based categorical eligibility? May the State make this reporting requirement a TANF reporting requirement? May the State make this reporting requirement a SNAP reporting requirement? Does the State need to inform FNS of the additional reporting requirements?

Answer: Yes, a State with simplified reporting has the discretion to require a categorically eligible household to report when its income exceeds the income limit of the TANF program used to confer categorical eligibility. This would be a SNAP reporting requirement. When designing the TANF program, the State may require recipients to report when their income exceeds a percentage of FPG. This would be a TANF reporting requirement.

The State must inform FNS if it requires categorically eligible households to report when their income exceeds the income limit of the TANF program used to confer categorical eligibility.

Question 17: How does the State treat a categorically eligible household that fails to report a change that would make the household ineligible for the TANF program that confers categorical eligibility?

Answer: If the State requires a recipient to report a change when an increase in their gross income makes them ineligible for the TANF program, and a household fails to report this change, the State should use the same procedures it would use under the regular SNAP rules when a household fails to report a change.

Additional Questions:

Question 18: Households are categorically eligible for SNAP if they receive or are authorized to receive public assistance, general assistance, or SSI. What does authorized to receive mean?

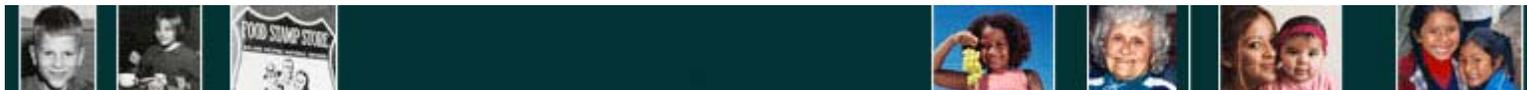
Answer: Authorized to receive means that an individual has been determined eligible for benefits (e.g. public assistance or SSI) and the individual has been notified of their eligibility. The benefits may have been authorized but not received, authorized but not accessed, suspended or recouped, or not paid because they are less than a minimum amount.

Question 19: How is the participation rate decided if the TANF-funded program used to confer broad-based categorical eligibility has an income limit above 130% of FPG? For example, if the State uses a TANF-funded program to confer categorical eligibility with an income limit of 185% of FPG, are those households between 130% and 185% of FPG, who are now eligible for SNAP but not participating, included in the participation rate?

Answer: Currently, FNS excludes households that are eligible for SNAP because of broad-based categorical eligibility from the participation rate. Therefore, if a State implements broad-based categorical eligibility with a TANF-funded program that has an income limit of 185% of FPG, FNS will exclude households that are between 130% and 185% of FPG from both the numerator and denominator. This method of calculating the participation rate may change.

Question 20: Would the Food and Nutrition Service (FNS) provide States interested in implementing broad-based categorical eligibility, a list of what other States are using to trigger categorical eligibility?

Answer: Yes, FNS will provide interested States with listings of how other States have interpreted broad-based categorical eligibility. Please contact your regional office for more information.



Questions & Answers On Categorical Eligibility & Vehicles

This memo gives guidance on categorical eligibility for food stamps, and new policies on vehicles as resources, under rules published on November 21, 2000.

July 30, 2001

Subject: FSP - Questions and Answers Regarding Categorical Eligibility and Vehicle Policies

To: All Regional Directors / Food Stamp Program

On November 21, 2000, we published a final rule entitled "Noncitizen Eligibility and Certification Provisions of Public Law 104-193, as Amended by Public Laws 104-208, 105-33, and 105-185". The rule contained several provisions addressing issues related to categorical eligibility. Although the categorical eligibility provisions of the rule primarily codified procedures regarding categorical eligibility related to the receipt of non-cash or in-kind benefits which had been disseminated via policy memoranda prior to the rule, it did change some of those procedures. We have recently received several inquiries regarding the impact of these provisions. The issues, some of which were raised informally prior to publication of the rule, are discussed in the attached question and answers. Also attached, in question and answer format, are questions that we have received regarding the handling of vehicles as resources.

To reflect changes in the categorical eligibility criteria mandated by the November 21, 2000 rule, we are updating our list of State Temporary Assistance for Needy Families (TANF) or Maintenance of Effort (MOE) funded programs that confer categorical eligibility. We are requesting that you survey the States in your region regarding the State TANF/MOE funded programs that will confer categorical eligibility. We are also requesting that you survey the States in your region regarding their vehicle valuation policies. Attached, for your reference, is a table containing the information that we are requesting on State categorical eligibility programs and vehicle valuation policies. Please provide us with the information on the States in your region no later than September 1, 2001.

If you have any questions regarding categorical eligibility issues, please contact Larry Tropp of my staff at (703) 305-2437. For questions regarding vehicle issues, please contact John Busey at (703) 305-2532.

/S/ Arthur Foley

Arthur T. Foley
Director
Program Development Division



SEP 30 2009

United States
Department of
Agriculture

Food and
Nutrition
Service

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Alexandria, VA
22302-1500

SUBJECT: Improving Access to SNAP through Broad-Based Categorical Eligibility

TO: Regional Administrators
All Regions

We would like to highlight the potential of expanded categorical eligibility to enhance Supplemental Nutrition Assistance Program (SNAP) operations and accessibility. We recognize that your staff has been instrumental in supporting States' adoption of expanded categorical eligibility, and are pleased that over half of the States have adopted this policy to date. We encourage you to continue promoting expanded categorical eligibility as a way to increase SNAP participation and reduce State workloads.

In these times of rising caseloads and shrinking State budgets, expanded categorical eligibility can benefit States by simplifying policies, by reducing the amount of time States must devote to verifying resources, and by reducing errors. It can benefit families hurt by the economic crisis. For example, families with low incomes and modest assets will be eligible for benefits. It can extend food assistance to families with high expenses but gross incomes slightly higher than the normal gross income test. Applicants will not need to provide documentation verifying their resources. Finally, adopting expanded categorical eligibility can promote asset accumulation among low-income families.

As you know, a household is categorically eligible for SNAP if the household receives a cash benefit, such as public assistance, general assistance, or Supplemental Security Income, or a TANF/MOE funded non-cash benefit, such as a pamphlet or counseling services. In the past, we have referred to non-cash categorical eligibility as "expanded categorical eligibility," "soft categorical eligibility," and "hard categorical eligibility." From this time forward, we will use the term, "broad-based categorical eligibility" to refer to the policy that makes most, if not all, households categorically eligible for SNAP because they receive a non-cash TANF/MOE funded benefit or service, such as an informational pamphlet or 800-number. We will use the term, "narrow categorical eligibility" to describe the policy that makes a smaller number of households categorically eligible for SNAP because they receive a TANF/MOE funded benefit such as child care or counseling. We believe that these terms, broad-based categorical eligibility and narrow categorical eligibility, better describe the policy.

Both narrow and broad-based categorical eligibility are non-cash categorical eligibility. We will refer to cash categorical eligibility as "traditional categorical eligibility." We have attached a handout and flow chart to help you and your States with the complex regulations that define and regulate categorical eligibility. Please feel free to share these tools with your States.

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Regional Administrators
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We believe that increasing the number of States that implement broad-based categorical eligibility will benefit families hurt by the economic crisis, promote savings among low-income households, and simplify State policies. Please encourage your States to adopt broad-based categorical eligibility to improve SNAP operations in your States.

If you have any questions or need more information, please contact Moira Johnston at 703-305-2515 or Sasha Gersten-Paal at 703-305-2507.



Jessica Shahin
Associate Administrator
Supplemental Nutrition Assistance Program

Enclosures

Enclosure

The Supplemental Nutrition Assistance Program's (SNAP) regulations (7 C.F.R. § 273.2(j)) address categorical eligibility. The regulations distinguish between **cash and non-cash categorical eligibility**. Cash categorical eligibility refers to households in which all members receive or are authorized to receive cash benefits from the following programs: General Assistance, Public Assistance, or Supplemental Security Income. Non-cash or in-kind categorical eligibility includes programs and services that do not provide cash to recipients, but are funded by the Temporary Assistance for Needy Families (TANF) Program, either by the Federal or State Maintenance of Effort (MOE) share. These services could include transportation vouchers, childcare, counseling Programs, parenting classes, pamphlets, or referrals to TANF-funded services. When a household is categorically eligible, it means that the State Agency does not use certain Program rules, such as asset and gross income limits; these households must meet all other SNAP rules and have net incomes low enough to be eligible for a benefit.

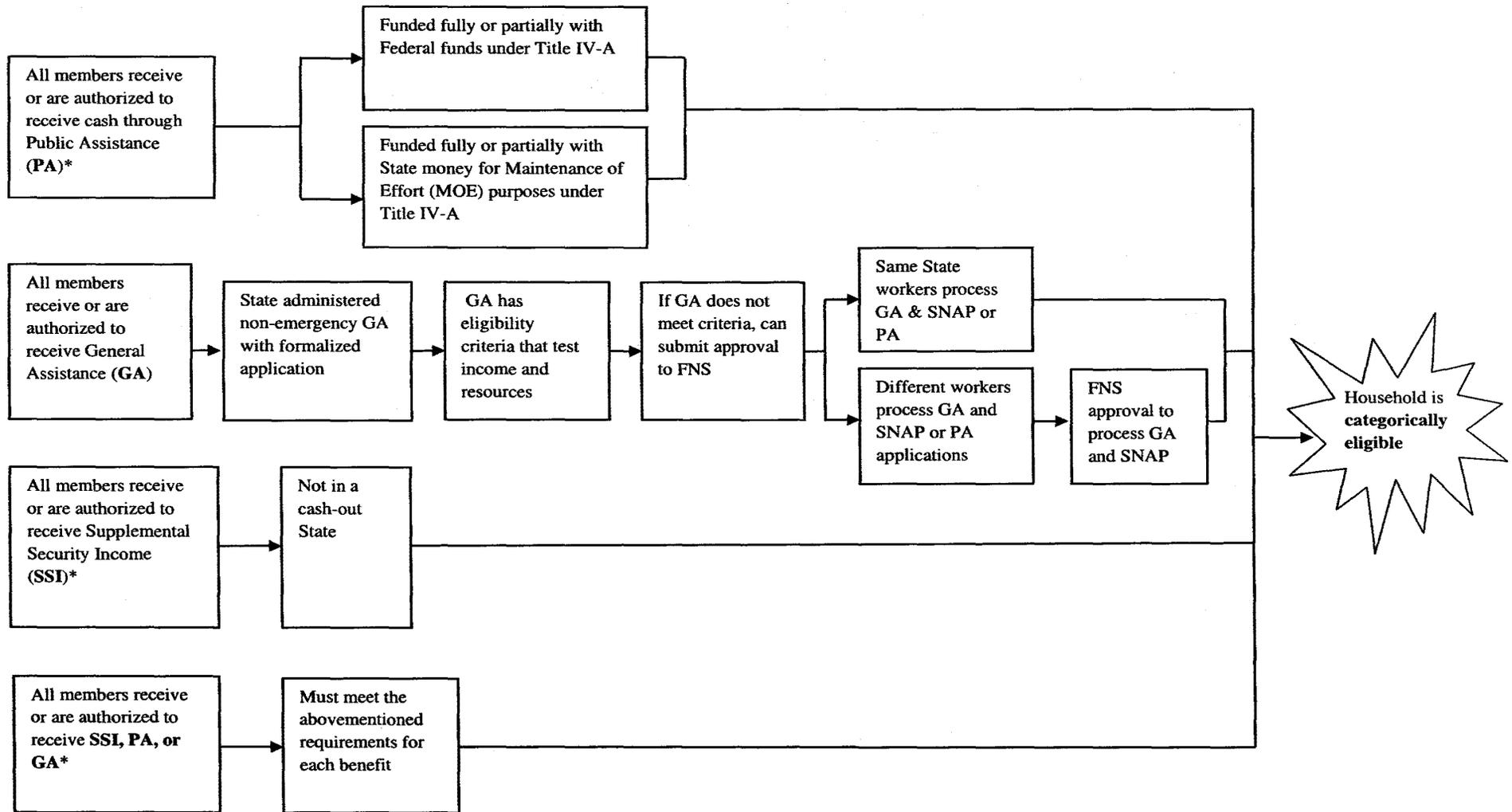
At the Food and Nutrition Service (FNS), we refer to cash categorical eligibility as **traditional categorical eligibility**. We differentiate non-cash categorical eligibility into two categories: **narrow and broad-based categorical eligibility**. We previously referred to these categories as hard and soft categorical eligibility, respectively; we have also referred to soft categorical eligibility as expanded categorical eligibility. Narrow categorical eligibility describes a TANF/MOE-funded benefit, such as childcare or counseling, for which a small subset of the SNAP population is eligible. Even though all households that receive this benefit are eligible for SNAP, the households make up a relatively small share of the SNAP population. Broad-based categorical eligibility describes a TANF/MOE funded benefit or service for which most, if not all, SNAP households are eligible, such as an informational pamphlet or an 800-number to call to locate TANF-funded services. Both narrow and broad-based categorical eligibility would fall under non-cash categorical eligibility. In over half of States, SNAP households are categorically eligible under a broad-based TANF/MOE funded Program; these households must still meet eligibility requirements to qualify for benefits.

Many of the categorical eligibility regulations refer to the purposes of the TANF grant. The four purposes of the TANF block grant are:

1. Assisting needy families so that children can be cared for in their own homes
2. Reducing the dependency of needy parents by promoting job preparation, work and marriage
3. Preventing out-of-wedlock pregnancies
4. Encouraging the formation and maintenance of two-parent families

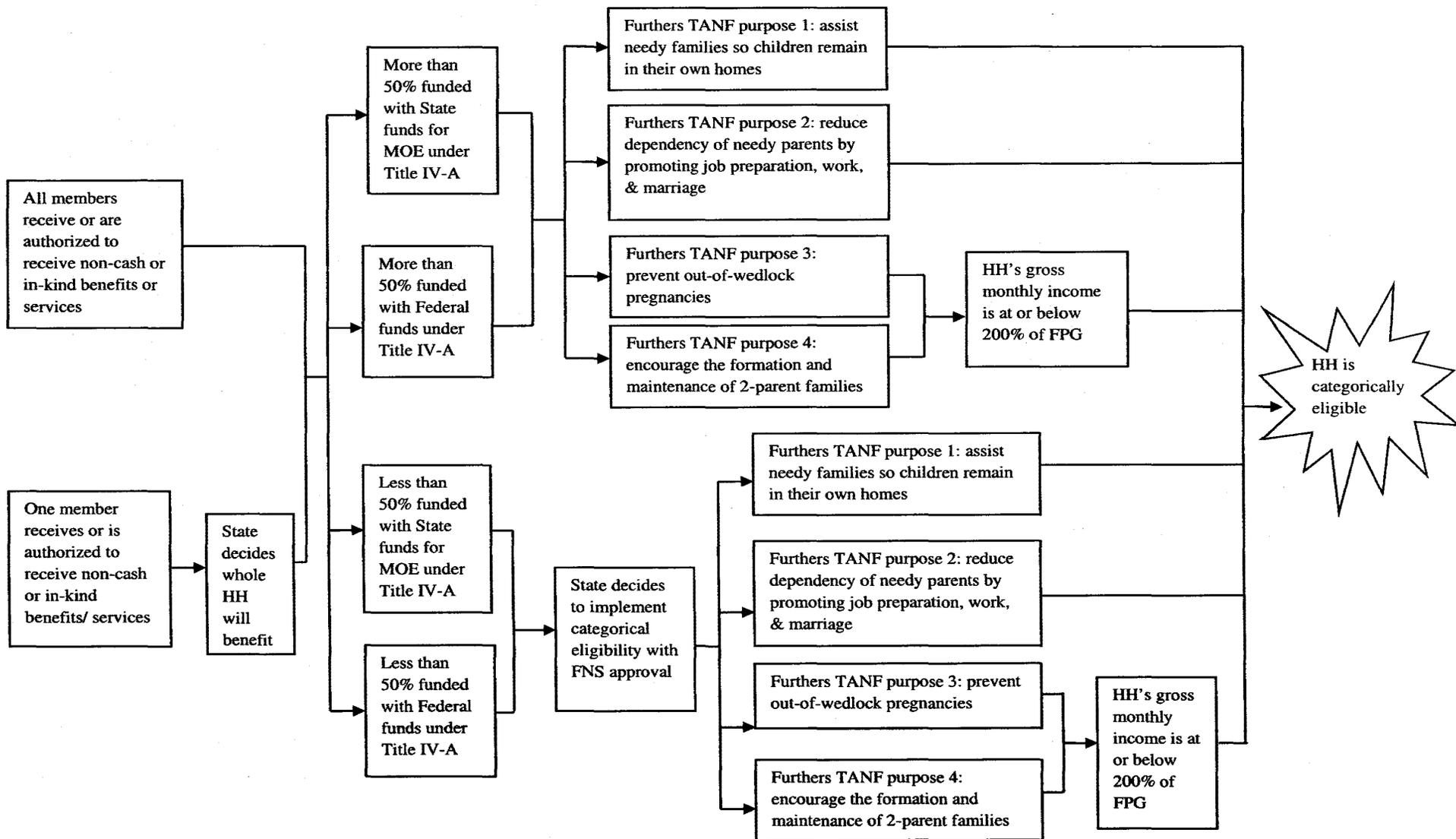
Guidance documents lack the force and effect of law, unless expressly authorized by statute or incorporated into a contract. USDA may not cite, use, or rely on any guidance that is not available through their guidance portal, except to establish historical facts.

CASH BENEFITS: Households are categorically eligible if...¹



¹ Assuming household meets SNAP's definition of a household (includes all who purchase and prepare meals together) and does not include anyone who is institutionalized or has been disqualified from SNAP

NON-CASH BENEFITS: Households are categorically eligible if...²



² Assuming household meets SNAP's definition of a household (includes all who purchase and prepare meals together) and does not include anyone who is institutionalized or has been disqualified from SNAP

Households are not categorically eligible if:

- Entire household is institutionalized
- Any member is disqualified for intentional program violation or for failure to comply with monthly reporting requirements
- Household is disqualified because one or more of its members failed to comply with workfare
- Head of household is disqualified for failing to comply with work requirements.
- Any member of household is ineligible because of a drug-related felony
- Household refuses to provide State Agency with enough information to determine eligibility

No one can be included in a household that is otherwise categorically eligible if the person is:

- An ineligible alien
- A student who is ineligible under the student provisions
- An SSI recipient in a cash-out State
- Institutionalized in a non-exempt facility
- Ineligible because of failure to comply with work requirements
- Failing to provide or apply for a social security number
- Disqualified for intentional Program violation
- On strike

If the household is categorically eligible, the following still applies:

- Work registration requirements (and exemptions, if they apply)

If the household is categorically eligible, verification of the following eligibility factors is not required:

- Resource limits
- Gross and net income limits
- Residency (must be verified through the other program, but State must use SNAP residency verifications if TANF program has stricter rules)



MAR 18 2010

**United States
Department of
Agriculture**

**Food and
Nutrition
Service**

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**Alexandria, VA
22302-1500**

SUBJECT: Supplemental Nutrition Assistance Program: Using Broad-Based Categorical Eligibility to Exclude Refundable Tax Credits Permanently

TO: All Regional Directors
Supplemental Nutrition Assistance Program

The American Recovery and Reinvestment Act (ARRA) created or expanded many refundable tax credits to help families struggling with the economic crisis; the intent was not to make it harder for these families to become eligible for the Supplemental Nutrition Assistance Program (SNAP). One way to avoid making families who receive tax credits ineligible for SNAP is for State agencies that have adopted broad-based categorical eligibility to exclude refundable tax credits from consideration as assets.

Broad-based categorical eligibility refers to the policy that makes most, if not all, households categorically eligible for SNAP because they receive non-cash TANF/MOE funded benefit or service, such as an informational pamphlet or 800-number. We are pleased that many State agencies have implemented or are planning to implement broad-based categorical eligibility. We recommend that all State agencies that have implemented a broad-based categorical eligibility program with an asset limit exclude refundable tax credits from consideration as assets in the program that confers categorical eligibility.

ARRA created the Making Work Pay (MWP) tax credit as a way to support working families. ARRA excluded MWP from consideration as income in the month of receipt and as an asset for the month of receipt and two months following receipt, for all Federal means tested assistance programs. The MWP exclusion is intended to protect a family's eligibility for means tested assistance programs. Unfortunately, MWP could harm some families' eligibility for SNAP. Although many families will receive MWP in their paychecks, families that have not had income taxes withheld by an employer will receive MWP as a lump sum. If these families are unable to spend down the lump sum within three months, they may be ineligible for SNAP because their assets are too high.

ARRA also expanded the Child Tax Credit and created. Current SNAP rules exclude the Child Tax Credit from income and from resources in the month of receipt and the month following receipt. If State agencies do not exclude these tax credits from consideration as resources through broad-based categorical eligibility, some families may lose their eligibility for SNAP.

We also encourage State agencies without broad-based categorical eligibility to implement a broad-based categorical eligibility program to simplify the administration of SNAP and help low-income households meet their nutritional needs. SNAP excludes the Earned Income Tax Credit (EITC), another refundable tax credit, from resources for 12

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months following receipt. Since the EITC has a longer exclusion period than most tax credits, broad-based categorical eligibility can simplify the treatment of all tax credits for eligibility workers. With broad-based categorical eligibility, State agencies can effectively raise the income limit and raise or eliminate the asset test. A de facto elimination of the asset test through broad-based categorical eligibility saves administrative costs because State agencies do not have to devote staff time towards verifying assets, and makes it easier for families to apply for SNAP because they do not have to provide verification of their assets.

Broad-based categorical eligibility can also protect these families from losing eligibility if their receipt of refundable tax credits pushed them over the normal asset limit. Broad-based categorical eligibility also allows low-income families with modest resources put better food on the table. Many of these families may have been hurt by the economic crisis and now have difficulty finding work. Broad-based categorical eligibility allows these families to maintain their modest savings by helping them meet their nutritional needs.

Additionally, State agencies can design broad-based categorical eligibility policies to help families with high expenses but modest incomes by slightly raising the gross income limit. Although these families have incomes slightly above the normal SNAP income limit, their expenses put their net income below the Federal Poverty Guidelines, and they are eligible to receive a meaningful benefit.

We encourage all regional offices to work with their State agencies to encourage them to adopt broad-based categorical eligibility and ensure that refundable tax credits do not harm families' eligibility for SNAP.

If you have any questions or need more information, please contact Sasha Gersten-Paal at (703) 305-2507 or sasha.gersten-paal@fns.usda.gov.



Lizbeth Silbermann
Program Director
Program Development Division