



July 22, 2014

Mr. Patrick Lucrezio
Chief
Program Accountability and Administration Division
Food and Nutrition Service
3101 Park Center Drive, Room 810
Alexandria, VA 22302

RE: Comments on the Request for Information on SNAP High Performance Bonuses

Dear Mr. Lucrezio,

Thank you for the opportunity to comment on the Request for Information on SNAP High Performance Bonuses (Federal Register, Vol. 79, No. 79, April 24, 2014, p. 22788). The Center for Law and Social Policy (CLASP) is a national non-profit organization that develops and advocates for policies at the federal, state and local levels that improve the lives of low-income people.

The 2002 Farm Bill revised the SNAP penalty and bonus structure to establish a more balanced system that emphasizes not only how well states perform with respect to payment error rates, but also considers how well states reach eligible households, act promptly when eligible households apply for assistance, and follow proper procedures when denying or terminating SNAP benefits. It also includes bonuses for states that show significant improvement, as well as those achieving the highest level of accuracy or service, so that all states have an incentive to improve.

SNAP has a heavy emphasis on payment accuracy and has achieved record-low error rates in recent years. At the same time states have made the program more accessible to low-income households: between 2003 and 2011 the national participation rate rose from 56 percent to 79 percent, according to USDA.

We write to express a number of our concerns with the USDA's consideration of expanding the scope of the performance bonuses to three new categories: employment and training, nutrition education, and recipient integrity. Most of the contemplated changes would not strengthen the program and run the risk of harming SNAP's core purposes. We are particularly concerned that the bonuses for recipient integrity and employment and training would encourage states to adopt

practices that put food assistance benefits at risk for some of our states' most vulnerable households. USDA is already encouraging states to improve their performance in these areas.

In the area of recipient integrity, we agree that SNAP must take program integrity seriously to ensure policymakers and the public have confidence in the program. However, the core purpose of the program is undermined when states pursue claims or disqualify people from the program when they are innocent or misunderstand program rules. States already have a strong incentive to address program integrity as they can keep a portion of many of the improper payments they collect.

Similarly, while we agree that the right types of employment and training programs can be helpful, we are very concerned that performance measures that do not take into account the differing characteristics of recipients can have negative effects. Performance measures that hold states accountable for achieving high rates of employment among participants can incentivize states to adopt sanction policies or barriers to participation that can take away food from extremely vulnerable individuals and children. Congress recognized these challenges when it included SNAP E&T outcome measures in the recent Farm Bill, which requires that reporting measures shall:

“(II) include additional indicators that reflect the challenges facing the types of members of households participating in the Supplemental Nutrition Assistance Program who participate in a specific employment and training component.”

Moreover, we do not have good evidence of which SNAP E&T programs are successful at increasing the opportunities and income of SNAP recipients. USDA already has several efforts underway to test approaches, including the newly authorized SNAP E&T pilots, which we expect to yield results and recommendations for future policy making. It is premature to expand performance bonuses to include this category at this time.

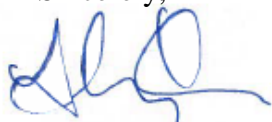
Furthermore, the areas USDA is considering do not include additional program access measures. If USDA does decide to expand the categories for performance bonuses, we recommend focusing on additional areas of program access. For example, there currently is no measure of states' success in keeping eligible households connected to SNAP at recertification. USDA may want to consider measuring the rate of procedural denials or closures as a way of ensuring that states develop and maintain eligibility processes that qualified households are able to navigate. We also would like to see states and USDA measure the success states have in integrating SNAP into a package of human services benefits, including health coverage, child care, and other nutrition benefits such as school meals and WIC.

USDA also asks for input on whether to link the existing bonuses to ensure that states performing exceptionally well on one measure must meet a minimum standard of performance in other bonus categories. We support the linking of bonuses, provided that it applies to all bonuses and only states that are extremely poor performers are affected, not simply those slightly below the national average. Moreover, we suggest USDA consider not denying the bonus entirely in these cases, but requiring states to reinvest all or a portion of the bonus toward measures that are designed to address the problem area.

In conclusion, we strongly recommend against expanding the number of bonuses. If USDA wishes to consider additional categories or other significant changes, it should do so as part of a legislative proposal that seeks additional resources for high performance bonuses and that expands the debate to a broader conversation about SNAP as an anti-hunger program, for example, by looking at how well the state packages SNAP with other nutrition benefits, such as school meals and WIC, or how well it impacts recipients' overall health and well-being.

We appreciate the opportunity to comment. Please do not hesitate to contact me at hlee@clasp.org or at 202-906-8007 with any questions.

Sincerely,



Helly Lee
Senior Policy Analyst