



SNAP Program Design Branch
Program Development Division
Food and Nutrition Service
3101 Park Center Drive
U.S. Department of Agriculture
Alexandria, VA 22302

Re: Notice of Proposed Rule Making -- Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP) RIN 0584-AE62

Dear SNAP Program Design Branch:

I am writing on behalf of the Center for Law and Social Policy (CLASP) in opposition to the U.S. Department of Agriculture's proposed regulation to eliminate Broad Based Categorical Eligibility (BBCE) from the Supplemental Nutrition Assistance Program (SNAP) and sharply restrict the types of benefits and services that can confer categorical eligibility. CLASP is a national, nonpartisan, anti-poverty nonprofit advancing policy solutions for low-income people. We work at both federal and state levels, supporting policy and practice that makes a difference in the lives of people living in conditions of poverty. CLASP works to develop and implement federal, state, and local policies (in legislation, regulation, and on the ground) that reduce poverty, improve low-income people's lives, and creates pathways to economic security for everyone. That includes directly addressing the barriers people face because of race, ethnicity, and immigration status. Through high-quality analysis grounded in data and on-the-ground experience, effective advocacy, a strong public voice, and hands-on technical assistance, CLASP develops and promotes new ideas, mobilizes others, and provides guidance to government leaders and advocates to help them implement strategies that deliver meaningful results to people across America.

These comments draw on CLASP's deep experience with SNAP as well as the Temporary Assistance for Needy Families (TANF) block grant. These comments also draw on CLASP's experience in working with six states under the Work Support Strategies (WSS) project, where these states sought to dramatically improve the delivery of key work support benefits to low-income families, including health coverage, nutrition benefits, and child care subsidies through more effective, streamlined, and integrated approaches. From this work, we learned that reducing unnecessary steps in the application and renewal process both reduced burden on caseworkers and made it easier for families to access and retain the full package of supports that they need to thrive in work and school. The proposed rule would be a major step backwards in the effort to streamline service delivery and cut red tape.

CLASP is deeply concerned by the attempts to restrict food assistance to individuals for whom SNAP is essential to meeting their basic needs and providing a work support. According to the administration's own calculations, in 2020, an estimated 3.1 million individuals in 1.7 million households would no longer be eligible for SNAP if BBCE were eliminated.¹ The people losing benefits would mostly be members of low-income working families, seniors and people with disabilities.² The changes to the rules would bring back the "cliff effect" for working families with significant housing or child care expenses, and penalize families for saving for college, a car, or just emergency expenses. Although the Notice of Proposed Rulemaking (NPRM) does not address this impact, an estimated half million children would also lose automatic eligibility for free school meals, according to unpublished Administration estimates.³

In addition, this rule will be burdensome to state agencies and the individuals who do continue to receive SNAP benefits. By the Administration's own estimates, for every dollar in reduced benefits paid to low-income individuals, states and the federal government will spend nearly 25 cents in additional administrative costs, primarily from the added cost of collecting and verifying information about assets.

Finally, this proposed rule is clearly against Congressional intent. In December 2018, Congress passed, and President Trump signed a bipartisan farm bill that did not restrict eligibility for SNAP. The conference committee explicitly rejected proposals from the House bill that would have restricted broad based categorical eligibility. This rule represents an attempt by the Trump Administration to do an end-run around Congress and implement changes that it could not achieve through legislation. There is no statutory basis for narrowing the "benefits" under Title IV-A of the Social Security Act that confer categorical eligibility, nor for arbitrarily limiting the conditions under which even cash assistance can do so.

We strongly support the goal of helping SNAP recipients obtain and keep quality jobs that pay them fairly and enable them to achieve economic security. We know that SNAP encourages work, and that increased access to SNAP makes it easier for people to find employment.⁴ The proposed restrictions will not advance this goal. In fact, the proposed rule will make it harder for families to achieve economic success. We strongly urge USDA to withdraw this proposed rule.

Background

Food is necessary for people to live, work and thrive. SNAP is our nation's most important anti-hunger program and is proven to reduce poverty⁵ and food insecurity.⁶ It provides food assistance to youth, working families, people with disabilities, seniors, and many more. Last fiscal year, SNAP helped 40.3 million people in 20.1 million households put food on the table.⁷ In 2015, SNAP lifted approximately 2.1 million Black people (including 1 million children)⁸ and an estimated 2.5 million Latinos (including 1.2 million children) out of poverty.⁹ Nearly three percent of Asian American and Pacific Islander (AAPI) families receive SNAP benefits,¹⁰ while many more are likely eligible but unenrolled due to cultural stigma and insufficient program outreach to AAPI groups.¹¹

Eligibility for SNAP is determined by a household's income and resources. Because the SNAP benefit

is based on the funds available to the family to buy food, state agencies subtract deductions such as work expenses, child care, excess housing costs, and medical expenses from a household's gross income to determine its net income. The net income is used to determine the SNAP benefit amount. Specifically, households are assumed to have one-third of the resulting net income available to purchase food. If that amount is less than the maximum SNAP benefit for a household of their size, the household receives the difference as a SNAP benefit to supplement their income available for food. Households with net income over 100 percent of the federal poverty level (FPL) for their household size are not eligible for SNAP benefits.¹²

SNAP also has a federal gross income limit—which looks at income before any deductions are applied. In states that have not modified this limit, a household loses eligibility for SNAP when its gross monthly income exceeds 130 percent of the FPL for the household size. As discussed in more detail below, this means that households can lose eligibility for SNAP as a result of a small increase in income. Families with significant deductions, due to high child care or housing costs, can experience a "cliff effect" where they lose more in SNAP benefits than they gain in earnings, resulting in a work disincentive.

SNAP also has a federal asset limit, which denies eligibility to households with more than modest amounts of resources including cash, vehicles or other property.¹³ For determining eligibility, assets or resources are defined as liquid or non-liquid assets such as money in bank accounts, certificates of deposit, stocks, and bonds, among other things. The regular eligibility rules provide that a household must have liquid assets below a specified level. Under federal rules in FY2019, a household's liquid assets must also be below \$2,250 (below \$3,500 in the case of households with an elderly or disabled member). The value of the home is excluded from this "asset test," as are certain other forms of assets (e.g., retirement and educational savings in dedicated accounts). Further, states may exclude one vehicle from the asset test, and must exclude the first \$4,650 of the fair market value of a household's vehicles.¹⁴ While most SNAP applicants have only modest assets,¹⁵ these rules discourage savings. In addition, because the asset rules under SNAP are extremely complicated (e.g. certain retirement accounts are excluded from being counted¹⁶ and tax refunds from the Earned Income Tax Credit are excluded for 12 months after receipt¹⁷), the asset limits significantly increase the administrative costs of SNAP.¹⁸

Broad Based Categorical Eligibility

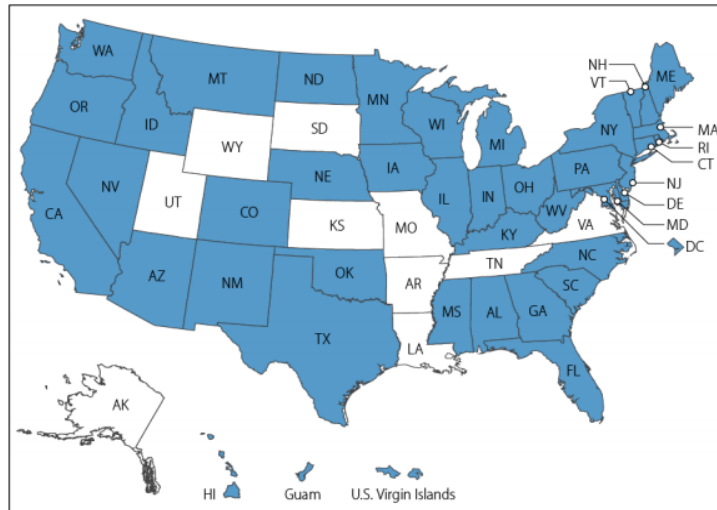
In recent years, as SNAP has increasingly become a program that supports low-wage workers and their families, there has been widespread recognition of the importance of supporting employment and wage growth among SNAP participants, and a recognition that the gross income limit and asset limit can be counter to these goals.¹⁹ Therefore, the vast majority of states have turned to Broad Based Categorical Eligibility (BBCE) as a tool to raise the gross income limit, remove the asset limit, or both.

Thirty-three states and territories use BBCE to raise the gross income limit—with 17 states currently raising the limit to as high as 200 percent of FPL. An additional 8 states have not increased the gross income limit but have used BBCE's flexibility to raise or eliminate the limit on household assets. The

remaining states do not use BBCE in their SNAP programs.²⁰

Figure 1. States Opting for SNAP Broad-Based Categorical Eligibility as of October 2018

(States opting for BBCE are shaded in blue)



Source: Congressional Research Service (CRS), based on data from the U.S. Department of Agriculture, as of October 2018.

The Food and Nutrition Act at 7 USC 2014 (a) creates categorical eligibility, stating “households in which each member receives benefits under a State program funded under part A of title IV of the Social Security Act” are eligible for SNAP, notwithstanding most other provisions of the SNAP statute (although their benefits are still determined by the usual calculation).

Under BBCE, households may become categorically eligible for SNAP because they qualify for non-cash benefits funded under Temporary Assistance for Needy Families (TANF) or State maintenance of effort (MOE).²¹ (Categorical eligibility conferred based on receipt of cash assistance is considered “standard” or “narrow” categorical eligibility.” Note that the proposed rule would also restrict standard categorical eligibility.) This allows states to align income eligibility and asset limits for SNAP with the eligibility rules used in programs or services financed under the TANF block grant or MOE as long as the TANF or MOE funded benefit meets one of the four goals of the TANF block grant.²² The Trump Administration’s proposal to end BBCE claims to be “closing a loophole” that makes it “easy” to get SNAP. But that’s simply untrue. The reality is that ending BBCE would take away food assistance from people who’ve proven they need it through a complex, time-intensive application and recertification process.

BBCE is not an automatic pathway to receiving SNAP benefits.²³ Households are still subject to the rigorous application and qualification process to qualify for SNAP benefits. Therefore, households who are categorically eligible must still submit applications, provide verification of income and comply with other mandatory policies such as the time limits for childless adults, aged 18 to 49 without documented disabilities.²⁴ Furthermore, households must go through interviews, wait in lines for indefinite amounts of time at public benefits offices or wait on the phone to speak with their caseworker, and provide verification of medical costs, shelter, utilities, child care, and more. Households are generally approved for benefits for 6 months at a time and one year if the household consists of an elderly person or person with a disability. If there are any significant

changes in income, shelter or other deductions, these changes must be reported within 30 days. In order to be recertified for SNAP, a household must submit the updated documentation that was previously stated and complete a yearly interview. Under BBCE, SNAP recipients still have to climb through multiple hoops to receive SNAP benefits.

Removing BBCE will increase “cliff effects,” discouraging work

SNAP deductions for earned income and other unavoidable household expenses²⁵ allow a household’s monthly food benefit to slowly decrease as earnings rise. BBCE allows states to reflect the high cost of living, and other local economic conditions by raising the gross income limit from the national standard of 130 percent of the federal poverty level (FPL).²⁶ Many low-wage workers in the U.S. pay extremely high housing, child care and medical expenses. For example, the fair market rent for a two bedroom apartment in 2019 is \$1194, however, the average rental affordability for someone working a federal minimum wage job is only \$377.²⁷ The average cost to provide center-based child care for an infant in the United States is \$1,230 per month and at a home-based center, the average cost is \$800 per month.²⁸ Raising the gross income limit helps families with high expenses and low disposable income to still be eligible for SNAP as long as they meet the net income limit after their deductions. Furthermore, the higher the gross income limit, the less likely that households will experience a “benefit cliff.”

Contrary to common concerns that BBCE will unduly expand the SNAP program, the administration estimates that only four percent of SNAP benefits go to households who are eligible due to BBCE²⁹ and the CBO estimates that percentage is actually even lower.³⁰ However, the flexibility provided to states by BBCE is vital for that percentage of working families because the federal gross income limit cuts off SNAP benefits completely when a household reaches the FPL. Without BBCE, when the federal gross income limit reaches 130 percent of FPL, SNAP benefits can be abruptly cut off. This abrupt cut off from food assistance is known as a “cliff effect,” which occurs when a worker’s relatively small pay raise results in a complete loss of benefits. In some cases, the value of SNAP benefits lost are greater than the increase in wages.³¹ Consequently, families find themselves working harder and increasing income but still unable to get ahead.

For example, the current federal gross income limit for a single parent with two children is \$21,330.³² If the parent of that household, who makes \$10 per hour, working 40 hours a week, or \$20,800 a year, receives a 50 cent per hour increase in wages, they would exceed the federal gross income limit at 130 percent. Therefore, due to an only 50-cent per hour raise, their SNAP benefits would be abruptly cut off.

This cliff effect can be especially harmful for those with high housing or childcare expenses. As the cost of living and childcare drastically increase across most metropolitan areas in America, it is imperative that these costs are considered as deductions from gross income under the SNAP program. If BBCE is eliminated, the gross income limit would drop down to 130% and many working families would lose necessary food assistance, even though their net income is still low due to the high cost of living in the US today.

Families having to choose between an increase in wages or putting food on the table is counterproductive to SNAP's goal of encouraging work.

BBCE provides pathways to economic security for SNAP recipients because it allows SNAP benefits to phase out gradually as income increases.³³ Because of the earned income disregard, earnings are treated more favorably than other income when benefits are calculated. Therefore, households with earnings get higher SNAP benefits than households without earnings.³⁴ For every additional dollar a SNAP recipient earns, his or her benefits decline by only 24 to 36 cents, providing families with a strong incentive to work longer hours or to seek and accept higher paying employment.³⁵

SNAP also promotes employment by ensuring people have their basic needs met to be able to find and sustain employment. Those working and seeking work on SNAP do not have to worry about when they will get their next meal. Instead, they can focus their energy on finding and keeping a job. Most SNAP recipients who can work, do work. Unfortunately, many low-wage workers are employed in sales and services jobs with volatile schedules, no sick leave, and minimal flexibility.³⁶ SNAP helps low-wage workers put food on the table for their families and encourages them to work toward increased financial stability.

Removing BBCE will discourage savings and exacerbate the racial wealth gap

In addition, states use BBCE to lift the asset limit, and therefore allow SNAP recipients to build up savings. As fluctuations in expenses or earnings occur, such as a car breakdown or a decrease in work hours, SNAP recipients can weather these setbacks with resiliency because of the money they've been able to save.

The proposed rule prevents SNAP recipients from saving money

SNAP asset limits run counter to the goals of SNAP of supporting recipients in work and enabling them to advance economically. Without savings, temporary setbacks such as a short-term job loss, an unusually high utility bill during a cold snap, or a car breakdown can result in a downward spiral that sets families back. The Journal of Community Practice estimates that around 39 to 46 percent of US households are asset poor or financially fragile, meaning they don't have a liquid savings of at least 3 months income and would be unable to come up with \$2,000 in 30 days.³⁷

The ability to build assets makes it possible for families to be prepared for emergency events, exit poverty and achieve economic security. Through BBCE, states are allowed to align the asset test and the gross income eligibility limit for SNAP with the eligibility rules used in programs financed by the state's TANF block grant.³⁸ Through this avenue, states may bypass the regular SNAP asset limits to eliminate duplicative verifications of eligibility, simplify administration of benefits, and expand SNAP eligibility to certain families in need. Therefore, working families can build their assets, continue to afford the food they need to survive, and pay all of their necessary bills without the threat of losing their food assistance.

Bringing back asset limits will discourage savings and encourage families to spend down any

resources they do acquire, such as from a modest inheritance, or payments from a lawsuit if they are injured in an accident. Asset limits force families to deplete savings and sell assets to qualify for assistance, sending the message that they should spend rather than save. Raising or eliminating asset limits promotes long-term savings and economic independence rather than dependence on immediate aid. Accumulating even a small amount of savings and assets may reduce the length of time families need public assistance.³⁹ Encouraging saving can soften economic hardship in the short- and long-term if families experience sudden income loss or unforeseen expenses. Savings provide families with a buffer for unexpected healthcare costs, allow them to plan for college so their children can have a brighter future, and prepare them to deal with unexpected job- and home-related problems.

The inability to save money has large implications for patterns of wealth accumulation and inequality in America. For example, although the Great Recession inflicted hardship on many families across the United States, it was especially difficult for low-income households that did not have the resources to cushion themselves against sudden losses such as unemployment, foreclosure, or other economic catastrophes.⁴⁰ Policies like BBCE allow for families to save money to protect themselves in times of economic turmoil. Previous research finds that SNAP households in BBCE states have higher assets than those in non-BBCE states.⁴¹ According to the Urban Institute, those living in BBCE states are more likely to have a bank account and to have at least \$500 in the account, though the authors found no difference in liquid asset amounts, net wealth, or vehicle ownership.⁴² Using BBCE to raise or eliminate asset limits is beneficial for helping families to save for emergencies, economic turmoil, a house, a vehicle and many other necessities.

Families should not have to choose between putting food on the table and purchasing a home. If BBCE is eliminated, families who have saved just a little as \$2,251 would have their benefits immediately terminated. The average down payment for a home is 4% percent of the purchase price under an FHA loan and 20% of the purchase price under a conventional loan.⁴³ The median purchase price of a home in the US is \$227,700.⁴⁴ For a family to purchase a home at the median cost in the US they must save anywhere from \$13,662 to \$45,540. To purchase even a modest \$100,000 home, an FHA loan requires a minimum down-payment of \$4,000 and a conventional loan requires a minimum down payment of at least \$20,000. Eliminating BBCE will discourage people from saving, including for a home, to prevent the loss of their necessary food assistance.

Asset limits not only includes savings, but vehicles as well. Under federal SNAP rules, states must disregard up to \$4,650 of the value of a single car per household and may exclude one vehicle per household. The federal standard exemption value has not been adjusted for inflation since 1977. If it had been indexed to inflation, the vehicle exemption would be at least \$11,000.⁴⁵ Therefore, if a SNAP recipient is even gifted a car that is worth more than \$4650, they are at risk of losing their SNAP benefits. By counting vehicles toward SNAP asset limits, states are interfering with the ability of people to keep their vehicles when they are facing financial difficulties, rather than placing them in a position that would make them more susceptible to prolonged poverty. States should be equipping applicants and recipients with the tools they need to become economically independent and self-sufficient, and a vehicle is an important step to getting and keeping a job.⁴⁶ When vehicle asset limits are relaxed or removed, households spend more on vehicles. Therefore, families have

greater access to reliable transportation which allows for more consistent and sustained employment, which leads to greater home equity, reductions in the need for program participation, and greater economic success.⁴⁷

The proposed rule will further exacerbate the racial wealth gap in this country

Bringing back asset limits will undermine efforts to reduce the racial wealth gap. Following the Civil War, across the North and South, ensuing White mob terror dispossessed Black land-owning families. At the same time, discrimination in the GI bill afforded Whites—not Blacks—housing assistance and restrictive covenants barred the sale of homes to Black families. Redlining put home ownership even further out of reach for black families, by preventing mortgage lending and investment in neighborhoods considered “undesirable.” These and many other instances of outright oppression, terror, and taking have fulfilled a steadfast tradition of this country of depriving Black people of wealth—causing what we now know as the racial wealth gap.

Government policy has played an ongoing role in the development of the racial wealth gap. The Social Security Act of 1935 excluded almost a third of all American workers from receiving public benefits, including farm workers and domestic workers who were predominantly people of color.⁴⁸ Exclusion from the Social Security Act cost Black people benefits totaling \$143.20 billion in 2016 dollars.⁴⁹ Further, the Federal Housing Administration (FHA) prohibited households of color from purchasing a home through redlining between 1934 and 1968. The FHA circled on a map the areas in which people of color lived to denote that mortgage lending would not be available. Such a practice contributed to homebuyers of color receiving just two percent of government mortgages.⁵⁰ Due to being denied traditional credit, many aspirant homeowners of color were led to wealth-stripping “land contracts”—a predatory arrangement in which buyers paid an exorbitant price to purchase a home and in which a missed payment would lead to eviction and loss of all equity. In cities like Chicago, where redlining was rampant, the practice of “land contracts” led Black families to pay an average of \$20,000 more for their homes than was paid by White families, ultimately stripping more than \$500 million in wealth (about \$3 billion in 2017 dollars) from families of color over a 30-year period.⁵¹

Today, the median wealth of Black households is \$17,600, compared to \$171,000 for Whites, according to the Federal Reserve’s Survey of Consumer Finances.⁵² White households living near the poverty line typically have about \$18,000 in wealth—due primarily to the cumulative effect of intergenerational wealth transfers—while Black households in similar economic conditions typically have a median wealth close to zero.⁵³

Public assistance programs like SNAP and TANF are vital basic-needs supports that help individuals and families that struggle financially. Building assets is a key component to exiting poverty. Therefore, the ability to save money without losing SNAP benefits is imperative for families of color to close the racial wealth gap.

Reinstating asset limits will reduce SNAP’s countercyclical effectiveness in a recession

SNAP plays an important role as a countercyclical support - meaning that it automatically expands when the economy is bad. This is both essential for individuals who need assistance, and an important way to stimulate the economy by putting money in the hands of those who will spend it quickly. The USDA estimates that every \$5 in new SNAP benefits generates as much as \$9 of economic activity. This translates into almost 10,000 jobs created for every \$1 billion in total SNAP spending.⁵⁴ However, those who lose their jobs during a recession and are pushed into poverty and food insecurity as a result are more likely to have savings than those who have had low incomes for extended periods. Forcing them to spend down their savings entirely both reduces the countercyclical benefits of SNAP and makes it harder for them to recover from their temporary setback.

Some of the most severe burdens of the Great Recession were shouldered by low income people who lacked emergency savings. The absence of assets in the form of emergency savings makes families with low incomes particularly vulnerable in times of economic distress. Without savings to cushion unexpected financial emergencies, many families who were financially fragile before the recession fell into, or deeper into, poverty.⁵⁵

The proposed rule will increase administrative costs

According to the USDA's own estimates, the proposed rule would cut \$10.543 billion in SNAP benefits over five years, causing 3.1 million people to lose their SNAP benefits.⁵⁶ In addition to taking food off of the tables of millions of Americans, the proposed rule would increase federal and state administrative costs by \$2.314 billion.⁵⁷ Consequently, for every dollar cut, there will be *20 cents more* spent on administrative costs. In addition, the federal estimate of one-time transitional costs of \$192 million seems a vast underestimate. For example, during the House Committee on Agriculture, Subcommittee on Nutrition, Oversight and Operations hearing on BBCE, witness Wisconsin Lt. Governor Mandela Barnes testified that it would cost just Wisconsin \$2 million dollars and would take at least 18 months to implement, if BBCE were eliminated.⁵⁸ Spending on administration does not reduce hunger or poverty, and also has less of a multiplier effect on the economy than SNAP benefits.⁵⁹

Under the Work Support Strategies (WSS) project, CLASP worked closely with six states that sought to dramatically improve the delivery of key work support benefits to low-income families, including health coverage, nutrition benefits, and child care subsidies through more effective, streamlined, and integrated approaches. From this work, we learned that reducing unnecessary steps in the application and renewal process both reduced burden on caseworkers and made it easier for families to access and retain the full package of supports that they need to thrive in work and school. Conversely, additional steps are burdensome to both caseworkers and participants. Every time that a client needs to bring in a verification or report a change adds to the administrative burden on caseworkers and increases the likelihood that clients will lose benefits due to failure to meet one of the requirements. In many cases, clients remain eligible and will reapply, which is costly to families who lose benefits as well as to the agencies that must process additional applications. The WSS states found that reducing administrative redundancies and barriers used workers' time more efficiently and helped with federal timeliness requirements.

The proposed rule would cause a substantial increase in churn - meaning that SNAP participants leave and return to the program within four months. Such short breaks are often driven by failures to return paperwork or other administrative hurdles rather than by diminished need for the program. According to the NPRM "the proposed rule will likely increase churn because households that were previously categorically eligible will face changes in the application process that will require them to provide additional verification at certification or recertification."⁶⁰ Churn increases administrative burden and administrative costs. A study conducted by the USDA and the Urban Institute found that states without BBCE experience a 26 percent higher rate of churn⁶¹ and, according to a USDA study, states spend an extra \$80 for each household that churned.⁶²

Further, because states can determine their own percentage of FPL for SNAP eligibility, the proposed rule will have varying impacts on churn by State. The states that have more expansive categorical eligibility will be disproportionately affected. The percentage of SNAP households that would become ineligible in States that currently use expanded categorical eligibility policies varied from 3.1 percent in Mississippi to a high of 17.6 percent in Wisconsin.⁶³ For instance, in 2017, there were 678,000 people receiving SNAP in Wisconsin.⁶⁴ Of those, approximately 119,328 people could lose SNAP benefits. Using the USDA's estimated cost per household that churned, if every person who lost benefits decided to reapply, the proposed rule would cost Wisconsin over \$9.5 million just strictly based on churn.

BBCE enables states to simplify their SNAP operations, consequently, decreasing administrative costs. According to a new study conducted by Mathematica for the USDA, state administrative costs per case are generally lower in states that use streamlining policies such as BBCE.⁶⁵ While many factors contribute to state administrative costs—including the state's economic conditions, policies, and eligibility systems—the adoption of BBCE significantly lowered administrative costs by 7 percent.⁶⁶ When states remove the asset test, they no longer need to collect and verify information on assets. This can be time consuming, as the asset rules are complicated. Furthermore, GAO found that BBCE simplifies program rules and the eligibility determination process for SNAP by creating consistency in income and resource limits across low-income assistance programs. This streamlining can ease the administrative burden for states and participants, save resources, improve productivity, and return administrative focus to essential program activities.⁶⁷ The USDA reimburses 50 percent of states' administrative cost, therefore, eliminating BBCE will be costly to states but also costly to the federal government as well.⁶⁸

BBCE also helps states to maintain or increase their federally mandated timeliness requirements for making eligibility determinations on access to SNAP.⁶⁹ States that fail to make timely determinations are also subject to corrective action plans and, possibly, financial penalties.

The proposed rule vastly underestimates the burden on applicants and recipients

Administrative hassle, increased churn, and slowed determinations are also costly for applicants and recipients. The Regulatory Impact Analysis vastly underestimates these costs. First, the RIA assumes that there will only be burden on applicants and recipients subject to recertification (here referred to as "applicants" for simplicity) when the state requires them to verify their reported assets. This is

clearly not true, as all applicants will have to figure out what assets need to be reported. The SNAP rules regarding assets are extremely complicated; this is not simply a matter of writing down the total amount in a savings account. For example, funds received from the EITC are not countable for 12 months, but only if the household was receiving SNAP at the time and has remained continuously on SNAP. Private student loans are not countable at all, but the portion of federal student loans that are used for room and board may be counted. Understanding these rules, and figuring out which assets must be reported, will clearly take some time and effort.

Next, the RIA uses an estimate that providing verification will only take 4 minutes per household at application, and six minutes at recertification. No explanation is provided of how these numbers were derived, or why it takes 50 percent longer to verify the same information at recertification. The only justification for the figures is that they are the ones in an approved data collection (OMB Control Number 0584-0064). However, zero comments were received on this data collection, meaning that there is no reason to think that anyone has ever looked at the underlying methodology.⁷⁰

While we are not aware of any data that specifically address the time involved in verifying assets, we know that verification often requires applicants to either return to a SNAP office or to call in to speak with a caseworker. Either of these activities requires applicants to incur direct costs (transportation costs to visit an office, or costs of minutes on a phone for calls, since SNAP recipients typically pay per minute for cellular service) as well as the opportunity cost of their time. Studies of service delivery suggest that wait times to be seen in an office of 30-90 minutes are fairly common, even in states that are making concentrated efforts to improve services.⁷¹ In some places, SNAP clients must line up outside of human services offices hours before they open to have any chance of being seen that day.⁷² Travel times are on top of that. A similar range is seen in phone experiences. Massachusetts, after concentrated efforts to improve services, has brought the average wait time for calls to 7 minutes⁷³ (still more than FNS' estimated total burden) while Missouri reported clients waiting as long as an hour to be served, and with nearly a quarter of callers giving up before ever speaking to a worker.⁷⁴ Verifying assets may also require a trip to the bank to obtain needed documents. Moreover, the RIA uses the federal minimum wage to determine the opportunity cost of time spent providing verifications, but more than half the states have higher minimum wages.⁷⁵ There can also be serious implications for households experiencing churn. For example, families may not have food for the start of the next month, causing a cascade of acute problems. Furthermore, the unexpected loss of benefits imposes costs on community organizations. For example, emergency food providers and other charities are often called on to step in when benefits end unexpectedly.

As noted above, adding verifications means that clients must wait longer for their applications to be approved. Timely determinations are important for individuals and families that seek SNAP; people apply for benefits because they are hungry today, not because they will be hungry in 30 days. People waiting for benefits may go hungry, may fail to pay utility or other bills, or may take short-term high interest loans from payday lenders or pawn shops, putting themselves into deeper financial holes.⁷⁶ In one study, among SNAP applicants facing emergencies or problems such as job loss, lack of sufficient food, loss of housing or care, and emergency medical needs, 60 percent reported that these situations could have been avoided or mitigated if they had received benefits faster.⁷⁷ When

asked how their application experience could be improved, “getting benefits faster” was one of the top answers.

Eliminating BBCE will cause lasting harm to communities nationwide including families with children, seniors and people with disabilities

The face of hunger in America is often hidden. It can look like a hard-working single woman denying herself her medication so she can buy groceries, a college student trying to work during the day and attend school at night, a young child unable to focus in his classes, a hungry young adult unsuccessfully trying to find a job in a competitive labor market without money for interview clothes, or even a veteran with Post-Traumatic Stress Syndrome choosing between rent, heating, and food after serving our country. Studies have shown that lack of access to food and proper nutrition exacerbates stress, anxiety, and depression,⁷⁸ causes sleep disturbances and fatigue, and impairs cognitive functioning⁷⁹ - conditions that are a significant barrier to finding a job, keeping a job, or getting training to improve wages. SNAP is the antidote that helps hungry people become more employable⁸⁰ and increase wages.⁸¹ The SNAP program has also been shown to stimulate economic growth,⁸² improve academic outcomes,⁸³ and improve health outcomes.⁸⁴ SNAP benefits allow recipients to spend less money on food and be better able to afford other basic needs such as medicine and housing. SNAP also reduces societal impacts of homelessness and illness.

A growing body of research links SNAP to improved health outcomes and decreased healthcare costs.⁸⁵ Food insecurity is associated with poor health outcomes such as the development of chronic health conditions including asthma, anemia, cognitive and behavioral problems, heart disease, hypertension, diabetes, anxiety, and depression. Adults with very low food security are 53% more likely to have a chronic illness.⁸⁶ Furthermore, adults who live in food insecure homes have 47% more emergency room visits, 47% more hospital admissions and 54% more days spent in the hospital.⁸⁷ SNAP improves dietary intake for its recipients and is considered an important health care intervention for low-income people.⁸⁸ SNAP reduces the prevalence of food insecurity by 30%, therefore, SNAP plays a vital role in improving the health and well-being of low-income people by making adequate, nutritious food more affordable.⁸⁹

As discussed before, FNS estimates that this rule will eliminate SNAP benefits for 3.1 million people.

The proposed rule will harm millions of children in the U.S.

13.1 million children lived in food-insecure households that had difficulty affording nutritious food to support an adequate diet SNAP is a critical program for children because it provides access to an adequate diet which has long-lasting benefits for children. Two-thirds of SNAP benefits go to children.⁹⁰ In 2018, 1.3 million children were lifted out of poverty by SNAP.⁹¹ Over 9.2 million households with children receive SNAP benefits; FNS estimates that 7.4 percent of them, over 680,000 households, would lose SNAP benefits.⁹² Most of them will be in households with workers.⁹³

Access to SNAP promotes healthy birth outcomes and child well-being

The U.S. Centers for Disease Control strongly recommends that even before conceiving, women achieve a healthy weight and nutritious diet in order to maximize their odds of a healthy pregnancy.⁹⁴ Nutrition assistance has been documented to promote healthy birth outcomes as well as to have long-term benefits for the children of recipients. Researchers compared the long-term outcomes of individuals in different areas of the country when SNAP expanded nationwide in the 1960s and early 1970s and found that mothers exposed to SNAP during pregnancy gave birth to fewer low-birth-weight babies.⁹⁵ If women in early pregnancy are cut off from nutrition services, the negative outcomes would extend decades into the future, diminishing their children's opportunity to thrive in tangible and entirely preventable ways.⁹⁶ Low-income women are already more likely to have poorer nutrition and greater stress, which can impair fetal brain development and health during pregnancy.⁹⁷ Economic stressors, combined with inadequate prenatal care for low-income pregnant women, are associated with higher rates of preterm births and infant mortality.⁹⁸

Children from low-income families are more likely to have health, behavioral, academic, learning and emotional problems. However, access to SNAP increases the overall health, well-being, academic success and cognitive development because through SNAP children are able to access an adequate and healthy diet.⁹⁹ SNAP improves the short and long-term well-being of children who receive it.¹⁰⁰

Families with children receiving free school meals will be greatly affected

Families with children who lose SNAP benefits due to the elimination of BBCE could also lose access to free school meals. The nutritious breakfasts and lunches that low-income children receive at school help combat childhood hunger, while playing an important role in improving academic achievement and test scores and reducing absenteeism, tardiness, and discipline referrals.

Unfortunately, more than 500,000 children would lose automatic eligibility for free school meals under the proposed rule. All school districts participating in the National School Lunch Program are required to directly certify their students receiving SNAP for free school meals.¹⁰¹ This means that their parents do not need to fill out any additional forms. It is an extreme oversight and disservice to children living in the US that the administration did not include this number in their regulatory impact analysis even though when FNS briefed members of Congress on the rule, they estimated that over 500,000 children would lose automatic eligibility for free meals.¹⁰² The application process would create burdensome paperwork requirements that could cause many qualified children to fall through the cracks.

The proposed rule will harm many seniors in the U.S.

About 71 million people in the United States are age 60 and older.¹⁰³ Many live on fixed incomes and have limited financial means to afford expenses such as food, medical, or housing costs. Many have disabilities or take care of children. Unfortunately, food insecurity among seniors is all too common a problem. In 2017, 30 percent of all U.S. households included individuals aged 65 and older. Of this group, 7.7 percent (3 million) were food insecure, meaning that these households had difficulty affording nutritious, adequate food.¹⁰⁴ SNAP helps many low-income seniors to afford food, so they don't have to make the decision between paying for necessary medications or food—

allowing them to use their fixed incomes for other pertinent expenses.

Research indicates that food-insecure seniors have less nutritious diets, have worse health outcomes, and are at higher risk for depression than food-secure seniors.¹⁰⁵ Compared to other adult age groups, seniors are particularly vulnerable to the health consequences of food insecurity. Food-insecure seniors are twice as likely to report experiencing fair or poor general health; are 65 percent more likely to be diabetic, 57 percent more likely to have congestive heart failure, and 91 percent more likely to have asthma; and are 2.3 times more likely to suffer from depression.¹⁰⁶ Households with grandchildren are almost three times as likely to be food insecure. SNAP benefits help to alleviate these adverse conditions. For these seniors, the SNAP plays an important role. While it provides a modest benefit, just \$125 a month on average for households with members age 60 or older, it enables them to meet their basic food needs.

The proposed regulation would eliminate SNAP eligibility for households with individuals over age 60 who have more than \$3,500 in liquid savings. According to the administration's own estimates, approximately 600,000 people or 13.2 percent of all SNAP households with elderly members will lose benefits.¹⁰⁷ This represents more than one-third of the 1.7 million households the Administration estimates would lose SNAP. Through BBCE, states have had the flexibility to lift SNAP's very low asset tests. Low-income seniors in the 43 states that take the option receive SNAP benefits to purchase groceries without having to spend down their limited savings, which they will have little opportunity to replenish. This allows them to maintain a cushion that can help them weather future financial emergencies.

The proposed rule with harm people with disabilities

Having a disability can make it very difficult for people with disabilities or their caregivers to work and put food on the table. A staggering 20 percent of people with disabilities live in poverty and they are more likely to be food insecure.¹⁰⁸ The presence of a disability increases the risk of food insecurity significantly, and the combination of the reduced ability to earn income and the higher costs of health care, adaptive equipment such as wheelchairs, and other supports can strain household food budgets.¹⁰⁹ Programs like SNAP help to provide critical support to people with disabilities who need to make ends meet. SNAP supplements some of the cost of food, therefore, participants can spend more of their fixed incomes on housing, transportation, and health care costs

About 8 million people in 4.3 million households receiving SNAP have disabilities. According to the administration's own estimates, over 320,000 individuals with disabilities within 192,000 households would lose SNAP benefits due to the proposed rule.¹¹⁰ Poor nutrition and an inadequate diet can lead to or worsen the health conditions for people with disabilities. Losing SNAP benefits for these households would increase food insecurity and exacerbate health challenges and health care costs.¹¹¹

BBCE allows for families to save money, however, the proposed rule would impose a strict \$3,500 asset limit on households including people with disabilities. This rule does not account for the unexpected emergency expenses that could occur for someone with disabilities. According to the

Urban Institute’s most recent national Well-Being and Basic Needs Survey, approximately 40 percent of those with one chronic health condition and 57 percent of those with multiple chronic health conditions reported experiencing a material hardship—that is, difficulty paying rent or a mortgage, utilities, or medical bills, as well as food insecurity—in the past year.¹¹² Emergencies can be devastating for a family, especially a family with someone who has a disability. Families should not be at risk for losing their essential food benefits because they have savings for emergencies. Policies such as BBCE allow for households with someone with a disability to save for unexpected costs, while keeping food on the table.

The proposed rule would harm students

Research shows that having low income is the highest risk factor for food insecurity among undergraduate students yet almost 60 percent of likely eligible college students do not participate in SNAP.¹¹³ The rule will exacerbate existing confusion about SNAP eligibility for students and further decrease student applications. The rule will also make it more difficult for frontline workers to make clear eligibility determinations based on the increased paperwork that working students will have to provide as proof of their income and assets. In particular, the rule will force states to examine assets, creating potential for states to incorrectly count financial aid and/or loans that may temporarily make a student appear to be more financially secure than they are. The cumulative effect will be to unduly and unjustly discourage education. If finalized, the proposed rule would make it harder for food insecure students to achieve economic mobility through education and training activities and disconnect them from supportive services offered to SNAP recipients through the SNAP Employment & Training (E&T) program. In addition, it would make it harder for low-income families to save for their children’s future college costs.

Changing Student Demographics Have Increased the Need for SNAP

Students who enroll full-time right after high school, receive help from their parents, and do not work during the school year are no longer the norm on college campuses.¹¹⁴ The needs of college students have changed drastically over time, requiring more comprehensive supportive services that improve persistence and completion. For the first time since 1975 recent high school graduates from low income households are enrolling in college at rates higher than their middle income peers.¹¹⁵ A recent study from the Government Accountability Office found that having lower income was the number one risk for food insecurity among undergraduate students yet low SNAP participation rates put them at risk of being food deprived, negatively affecting their school performance and participation.

A reported 39 percent of all undergraduate students have a household income at or below 130 percent of the federal poverty line. The GAO reported that the highest student risk of food insecurity is being low-income and the second is being a first-generation college student.¹¹⁶ In spite of the risk of food insecurity, low-income students are enrolling in college at rates that now exceed that of their middle-income peers.¹¹⁷ But this proposed rule would increase food insecurity and interfere with students’ ability to attend and complete college.

Most undergraduate students (71 percent) have at least one characteristic—such as single parenting or working part time—that make it hard to attend college.¹¹⁸ As a result, they're less likely to finish school than "traditional" undergraduate students, who often attend full time, don't work during the school year, and/or receive support from their parents. The rule would make it harder for these students to access food assistance through SNAP.

This rule will limit the ability of people with low income to successfully maintain SNAP and complete a postsecondary education that can lead to quality employment with family-sustaining wages¹¹⁹ and employer sponsored healthcare and retirement savings.¹²⁰

Proposal Would Exacerbate Confusion about Students' Eligibility for SNAP

SNAP has specific rules that determine which low-income students can receive food assistance. Low-income postsecondary students who are enrolled at least half-time and not otherwise exempt must meet all of the standard SNAP eligibility rules, as well as one of several additional qualifications, such as working at least 80 hours a month, participating in work-study, or participating in an employment and training program.¹²¹ According to the Government Accountability Office (GAO), postsecondary officials and students report being confused by these student rules. This leads to misinformation about the availability of SNAP on campus and low SNAP enrollment. A reported 57 percent of potentially eligible students (those who have low incomes, and at least one additional risk factor for food insecurity) are not presently accessing SNAP.¹²² The proposed rule compounds the challenges of applying for and receiving an accurate determination which undermines education activities that could lead to greater economic contributions and increased productivity.¹²³

The proposed rule would likely increase confusion, particularly around the treatment of financial aid. Forty-two states and Washington, DC all use BBCE to raise or eliminate the asset limit within SNAP. Financial aid and loans are not countable toward SNAP eligibility when considering assets, however, there will be an increased burden that students applying for SNAP will experience. Students would have to provide proof of where the funds came from, and unfortunately, some students will be subjected to administrative error and oversight—possibly being incorrectly denied, based on the financial aid or loan for school being present in their bank account. Furthermore, SNAP agencies will have the increased burden of combing through detailed bank statements and letters from students to prove their SNAP eligibility. Eligible students are already not applying for SNAP benefits, the administrative burden on students and agencies would further exacerbate the numbers of eligible students who aren't applying for SNAP benefits.

Rule is an administrative overreach, contrary to Congressional intent, and impossible to implement

This proposed rule is clearly against Congressional intent. In December 2018, Congress passed, and President Trump signed a bipartisan farm bill that did not restrict eligibility for SNAP. The conference committee explicitly rejected proposals from the House bill that would have restricted broad based categorical eligibility. This rule represents an attempt by the Trump Administration to do an end-run around Congress and implement changes that it could not achieve through legislation. There is no

statutory basis for narrowing the “benefits” under Title IV-A of the Social Security Act that confer categorical eligibility, nor for arbitrarily limiting the conditions under which even cash assistance can do so.

The Food and Nutrition Act at 7 USC 2014 (a) creates categorical eligibility, stating “households in which each member receives benefits under a State program funded under part A of title IV of the Social Security Act” are eligible for SNAP, notwithstanding most other provisions of the SNAP statute (although their benefits are still determined by the usual calculation).

The proposed rule greatly limits the basis on which states can apply categorical eligibility. Two types of benefits would be considered to confer categorical eligibility:

1. Households in which “all members receive or are authorized to receive ongoing and substantial cash benefits” through a public assistance program funded in full or part with TANF or MOE funds. “Ongoing” cash benefits are defined as those that a household “receives or is authorized to receive” for at least six months. “Substantial” cash benefits are those that a household receives or is authorized to receive that are valued at a minimum of \$50 a month (or a higher threshold set by HHS).
2. Households in which members receive “ongoing and substantial” non-cash benefits, but limited to subsidized employment, child care subsidies or vouchers, and other work supports, including transportation benefits or other allowances for work-related expenses.
 - a. Again, the household must receive or be authorized to receive these benefits for at least six months, and they must be valued at a minimum of \$50 per month.
 - b. Benefits received by one individual shall confer categorical eligibility on the whole household if the state determines that the whole household “benefits” from the program.
 - c. If the program is at least 50 percent or more funded with federal money under IV-A or state money counted as MOE, it *must* confer categorical eligibility; at lower level, states have the option to extend categorical eligibility, if it “will further the purposes of the Food and Nutrition Act of 2008.”

Existing regulations at 7 CFR 273.2(j)(2)(iv), not affected by the proposed rule, state that “‘authorized to receive’ means that an individual has been determined eligible for benefits and has been notified of this determination, even if the 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.”

The restriction of categorical eligibility to “ongoing and substantial” benefits has no legislative basis. In fact, this language is picked up from a provision of the House-passed 2018 Farm bill that was rejected by the conference committee and not included in the enacted legislation. This regulation therefore represents an attempt to subvert Congressional intent.

Moreover, the definition of “ongoing” as requiring at least six months of receipt or authorization is

inconsistent with the statutory language at 7 USC 2014(a), which specifies that categorical eligibility shall not be conferred by participation in a state or local general assistance program that only provides “one-time emergency payments that cannot be provided for more than one consecutive month.” This language clearly indicates that Congress considered the question of whether short-term benefit receipt should confer categorical eligibility, and a) chose to limit it only for general assistance and not other programs and b) even in that case, only restricted one-time emergency payments, but did not require that an individual be approved for six months of benefits.

The arbitrary choice of six months as the cutoff is also inconsistent with TANF regulations, which define nonrecurrent short-term benefits as those that are designed to deal with a specific crisis situation or episode, not intended to meet recurrent needs, and will not extend beyond four months.¹²⁴

This definition is also impracticable, since, at the point of application for SNAP, a determination of TANF eligibility will not yet have been made. Unlike SNAP, TANF does not have federal timeliness requirements for processing applications, and many states do not even begin to review cases for TANF assistance until after applicants have attended a session on work requirements and, in many cases, conducted job search activities. This means that states will either have to collect information on assets from all applicants, including those who are applying for cash assistance, or reach out to applicants later in the process to collect this information. In either case, it will be burdensome to both applicants and state agencies, and will delay the timely processing of SNAP applications.

Similarly, the choice of non-cash benefits that the agency has chosen to permit to be counted for categorical eligibility is arbitrary, with no statutory basis. The TANF program does not define “benefits” and clearly allows TANF funds to be used for a wide range of services and programs that extend beyond the list provided in the NPRM. FNS states in the NPRM states that it is limiting benefits to those that “provide meaningful opportunities for households to obtain employment and financial stability.”¹²⁵ However, promoting work is only one of the four statutory purposes of TANF,¹²⁶ and FNS does not have the authority to simply disregard the others.

In addition, FNS proposes not even to count all activities that are aimed at employment. In a masterpiece of circular reasoning, FNS arbitrarily sets a monetary value as the threshold for “substantial benefits” and then says that services such as education and training or job search assistance cannot be counted because it is “unsure how to determine a ready market valuation for such benefits.”¹²⁷

Conclusion

In conclusion, we urge the Department to withdraw the proposed regulation in its entirety. As anti-poverty experts, we believe that the proposed changes will harm millions of households in the US. 3.1 million individuals in 1.7 million households would no longer be eligible for SNAP if BBCE were eliminated—greatly affecting low-income working families, seniors and people with disabilities. Over a half million children would lose automatic eligibility for free school meals and families saving for college, a car, or just an emergency would lose SNAP benefits if they are over the asset limit. The

proposed rule would also bring back the “cliff effect” for working families with significant living expenses like housing or child care costs.

Further, this rule will be burdensome to state agencies due to increased administrative costs and burdensome to the individuals who will continue to receive SNAP benefits because of the increased required paperwork. The rule is clearly against Congressional intent because, in December 2018, Congress passed, and President Trump signed a bipartisan farm bill that did not restrict eligibility for SNAP. The conference committee explicitly rejected proposals from the House bill that would have restricted broad based categorical eligibility. This rule represents an attempt by the Trump Administration to circumvent Congress and implement changes that it could not achieve through legislation.

Lastly, our comments include citations to supporting research and documents for the benefit of the Food and Nutrition Service in reviewing our comments. We direct FNS to each of the items cited and made available to the agency through active hyperlinks and as attachments, and we request that these, along with the full text of our comments, be considered part of the formal administrative record on this proposal.

Thank you for the opportunity to submit these comments. Contact Elizabeth Lower-Basch (elowerbasch@clasp.org) and Parker Gilkesson (pgilkesson@clasp.org) with any questions.

Appendix A: Contributors to CLASP's Public Comment

Listed Alphabetically

Parker Gilkesson is a policy analyst with CLASP's Income and Work Support team. She works with low-income and work support programs with a focus on the Supplemental Nutrition Assistance Program (SNAP). Parker is a subject matter expert in social policy, benefit eligibility, human services delivery, racial equity, and state and local policy regarding SNAP, TANF, and Medicaid. Prior to joining CLASP, Parker began her career as a Human Services Specialist in Mecklenburg County, Charlotte, NC. In this role, she worked directly with recipients receiving Medicaid, TANF, and SNAP to determine their eligibility for low-income and work support programs. She has other experience including TANF policy research, cancer research, public health, public service, and nonprofits. Parker holds a Master of Public Policy, with a concentration in Public Administration from Liberty University and a Bachelors in Health Education, Maternal and Child Health from Howard University. Furthermore, Parker believes in the importance of bridging the gap between policy analysis and policy effectiveness. She is very passionate about social change taking place within our communities, therefore, Parker aspires to be a part of the equation to solve poverty and inequities in health and social welfare among citizens of the United States.

Madison Hardee is a senior policy analyst/attorney at CLASP, where she focuses on issues affecting access to health care and public benefits for immigrants and mixed-status families. Ms. Hardee co-leads the Protecting Immigrant Families, Advancing Our Future Campaign in collaboration with the National Immigration Law Center. Prior to joining CLASP, Ms. Hardee spent five years as an attorney with Charlotte Center for Legal Advocacy, where she provided direct legal representation to low-income clients across public benefit programs and saw first-hand how programs like Medicaid, SNAP and SSI reduce economic hardship, improve health, and increase stability. She successfully challenged state agency decisions and identified several areas for systemic advocacy. Working together with partner organizations, Ms. Hardee negotiated significant changes to Medicaid and ACA eligibility policies, providing access to health care for tens of thousands of low-income immigrants. Ms. Hardee holds a Juris Doctor from Tulane Law School and a bachelor's degree in public health from George Washington University. In 2016, she was presented with the New Leader in Advocacy Award by the National Legal Aid and Defender Association.

Elizabeth Lower-Basch is director of CLASP's income and work supports team. Her expertise is federal and state welfare (TANF) policy, other supports for low-income working families (such as refundable tax credits), systems integration, and job quality. From 1996 to 2006, Ms. Lower-Basch worked for the Office of the Assistant Secretary for Planning and Evaluation at the U.S. Department of Health and Human Services. In this position, she was a lead welfare policy analyst, supporting legislative and regulatory processes and managing research projects. She received a Master of Public Policy from Harvard University's Kennedy School of Government.

Renato Rocha is a policy analyst within CLASP's Income and Work Supports team. He focuses on issues regarding work reporting requirements across benefit programs as well as access to public benefits for immigrant families. Prior to CLASP, Renato was an economic policy analyst at UnidosUS (formerly National Council of La Raza), where he conducted analysis of consumer protection, budget, tax, disaster relief, and labor issues that impact the wellbeing of Latino and immigrant communities. In graduate

school, he also had the opportunity to work at the National Immigration Law Center, where he analyzed policy issues affecting deferred action recipients. Renato holds a Master in Public Affairs from Princeton University's Woodrow Wilson School of Public and International Affairs and a B.A. in Politics from Occidental College. In 2013, Renato served as a Fulbright Public Policy Initiative Fellow to Mexico.

Darrel Thompson is a research assistant with CLASP's Income and Work Supports team. He provides research support and analysis on various low-income and work support programs. Prior to joining CLASP, Darrel interned at the Center on Budget and Policy Priorities and the Lou Frey Institute of Politics and Government. He holds a bachelor's degree in political science from the University of Central Florida.

Carrie Welton is a policy analyst on the income and work supports team. Her work focuses on advocating for policy reforms that improve the lives of people with low income and communities of color using a racial equity lens. This includes improving access to public benefit programs for postsecondary students and student parents to advance their academic success. She also advocates for policy reforms that strengthen the Earned Income Tax Credit (EITC) and the Child Tax Credit (CTC). Previously, Ms. Welton spent three years at the W.K. Kellogg Foundation on the national Education and Learning team focused on early childhood systems alignment. In addition, she spent four years at the Kellogg Company conducting research and providing strategic direction to inform the organization's government relations and lobbying efforts. Ms. Welton also served on the state board of the American Civil Liberties Union (ACLU) of Michigan, furthering the civil liberties and civil rights of residents. As a member of the executive committee, she provided fiduciary, strategic, and generative leadership to the organization. She earned her Master of Public Administration from the Gerald R. Ford School of Public Policy at the University of Michigan and her undergraduate degree in Public Law from Western Michigan University.

Suzanna Wikle is project director for Advancing Strategies for Aligning Programs (ASAP), which works with state advocates to streamline and integrate their enrollment and retention systems for Medicaid and the Supplemental Nutrition Assistance Program (SNAP). ASAP is a multi-state initiative led by CLASP in partnership with the Center on Budget and Policy Priorities (CBPP). Ms. Wikle's leadership includes strategic guidance, working with state advocates to advance their agendas, serving as a policy expert, and providing a national perspective. She brings policy expertise on the Affordable Care Act (ACA) and Medicaid, as well as state advocacy experience.

Prior to joining CLASP, Ms. Wikle spent seven years at Kansas Action for Children (KAC), where she directed all advocacy and legislative priorities around children's health. Her advocacy work included advancing a Children's Health Insurance Program (CHIP) expansion, an overhaul of child care licensing standards, advancing strategies to reduce infant mortality, and an expansion of the newborn screening program. She also served as statewide project director of the Kansas Dental Project, an effort led by KAC to add mid-level dental providers to the workforce. Following her work at KAC, she served as senior policy analyst at Community Catalyst, focusing on the first ACA open enrollment period. In that capacity, she provided policy and enrollment knowledge to navigators and enrollment assisters as well as tracked obstacles to enrollment across the states. Ms. Wikle holds a master of social work, with an emphasis on Administration and Advocacy Practice, from the University of Kansas and a bachelor's degree in cultural anthropology from Washington University in St. Louis.

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