



April 12, 2017

Sasha Gersten-Paal, Chief
Certification Policy Branch
Program Development Division
Food and Nutrition Service
U.S. Department of Agriculture
3101 Park Center Drive, Room 812
Alexandria, VA 22302

RE: Requests for Information: Supplemental Nutrition Assistance Program Income Conversion Factors for Anticipated Income

Dear Ms. Gersten-Paal,

Thank you for the opportunity to comment on the Request for Information regarding the Income Conversion Factors for Anticipated Income within the Supplemental Nutrition Assistance Program (SNAP). The Center for Law and Social Policy (CLASP) advocates for public policies and programs at the federal, state, and local levels that reduce poverty, help low-income people become economically self-sufficient, and create ladders to opportunity for all. SNAP is a critical nutrition program that supports over 43 million individuals and is a key component of the safety net, helping millions of households maintain food security each year.

The average monthly SNAP benefit is modest at just \$125 per person, based on a formula that takes gross income, net income, and household assets into account. Current regulation provides state agencies several options for converting weekly and biweekly income into anticipated monthly income to determine a household's SNAP eligibility and benefit amount. For cases in which a household's exact monthly income cannot be anticipated, a state may calculate anticipated monthly income using its public assistance (PA) conversion standard or by multiplying weekly income by 4.3 or biweekly income by 2.15 (specific conversion factors).¹ The current standards permit states to select the most efficient methodology to help simplify procedures for eligibility workers and limit barriers to participation for individuals and families in need.

In response to concerns by the U.S. Department of Agriculture's (USDA) Office of the Inspector General, the Food and Nutrition Service (FNS) is soliciting input on changes to income conversion factors to (1) change the current factors used to convert weekly and biweekly income to anticipated monthly income from 4.3 to 4.33 and from 2.15 to 2.17, respectively and/or (2) eliminate states' ability to conform SNAP with its Temporary Assistance for Needy Family (TANF) income conversion methodology.

The current standards have been working for states and participants for approximately 40 years and are consistent with Congressional intent. A change would create an administrative burden on state agencies, and create unnecessary confusion for SNAP beneficiaries and applicants, including a decrease in benefits for some.

Following Congressional Intent

A change to the rules for converting weekly and biweekly income to anticipated monthly income would conflict with Congressional intent. The income conversion rules are consistent with current law and reflect Congress's desire to create a simplified approach. As FNS states in its *Request for Information*, Congress amended the Food Stamp Act in 1971 to direct FNS to establish eligibility standards for the Food Stamp program. Based on FNS's

response to GAO,² the House Committee Report recommending passage of the Food Stamp Act of 1977 recognized the FNS established methodology and directed SNAP eligibility workers to use the specific conversion factors that have since been codified in regulation. In its final rule making, FNS also provided states the option to use their PA conversion standards. This gives states the option to link income eligibility determinations between SNAP and other public benefits, namely cash assistance under Temporary Assistance for Needy Families (TANF). As nearly all TANF recipients also qualify for SNAP, it would impose unnecessary hassle and create confusion to force states to use different conversion methods for the two programs.

Maintaining Administrative Efficiency

A shift in income conversion standards would increase state agency costs and undo state's efforts to streamline eligibility processes across programs. The current standards minimize administrative burden on states, while ensuring adequate program access to needy households. Implementation of new standards would require states to reprogram systems, modify state regulations, change policies and procedures, and re-train eligibility workers. Furthermore, a change would require a robust campaign to educate SNAP participants and applicants, as well as advocates and community partners that assist low-income individuals and families seeking assistance. Changing the conversion standards that have been in place for so long will also inevitably result in increased error rates as states re-educate front line workers.

Protecting Participant Benefits

A change in the rules on income conversion would create unnecessary confusion for eligibility workers, as well as SNAP participants and applicants. Many current participants could experience a downward adjustment in their benefits, creating a hardship for those individuals and an influx of calls and concerns directed towards the state agency. The support families receive from SNAP, while critical, is already quite modest. There is no strong rationale for a change to a 40-year-old policy that would trim benefits for families already struggling to put food on the table.

We oppose a change to the current options for converting weekly and bi-weekly income into monthly income for the purposes of SNAP eligibility and benefit determination, including any alteration to the specific conversion factors. These long-standing options allow states to implement simplified income determination procedures. Imposing new standards would unduly burden state agencies, hinder program efficiency, and create additional hurdles for SNAP participants.

We appreciate the opportunity to comment on the request for information and welcome any questions you may have.

Sincerely,



Nune Phillips
Policy Analyst
nphillips@clasp.org

¹ 7 C.F.R. § 273.10(c)(2)(i)

² Office of the Inspector General, "FNS Quality Control Process for SNAP Error Rate," U.S. Department of Agriculture, September 2015, <https://www.usda.gov/oig/webdocs/27601-0002-41.pdf>.