



September 23, 2019

Ms. Jessica Shahin

USDA
Associate Administrator, SNAP
3101 Park Center Drive
Alexandria, VA 22302

Re: Docket ID Number FNS-2018-0037, Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program

Dear Associate Administrator Shahin:

Thank you for the opportunity to comment on USDA's proposed revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP).

The Wisconsin Board for People with Developmental Disabilities (BPDD) is concerned that the proposed changes will disproportionately and negatively impact people with disabilities and professional caregivers providing in-home services and supports for people with disabilities.

Wisconsin is one of 17 states that applied broad-based categorical eligibility for people with net incomes that fall between 130% and 200% Federal Poverty Level (FPL). Broad-based categorical eligibility provides SNAP benefits to 315,326 Wisconsin households. 48% of SNAP households have at least one member who is elderly, blind or disabled. 32% of Wisconsin's homecare workforce relies on SNAP benefits.

Using USDA projections, nearly 100,000 Wisconsinites—mainly people with disabilities, low income workers, and seniors--will lose access to SNAP if the proposed changes take effect, almost 20% of the total Wisconsin households currently receiving food assistance. Analysis by Mathematic finds that the proposed changes to categorical eligibility will result in 9% (almost 8,000) households with disabled members, 24% (34,000) low income households, and 5% (13,000) households with a gross income at or below 100% of the FPL to lose access to the SNAP program.

Wisconsin has effectively used categorical eligibility to incentivize work and increased wages, as well as reduce administrative costs. Allowing states to raise the amount of income households can earn means workers can work more hours and benefit from increased wages without losing access to food assistance.

Changing how income is calculated from net to gross significantly reduces the amount of money households can earn to remain eligible for food assistance; this rule erects a "benefits cliff" that forces individuals to choose between increasing hours and pay and losing food. Rather than allowing families to earn up to 200% FPL (net), this change effectively caps income at 138% FPL (gross). Given the high

proportion of low wage caregivers who rely on food assistance, BPDD is particularly concerned that these changes could result in caregivers reducing their hours, further exacerbating the workforce crisis and lack of capacity to provide critical supports and services to the disability community.

Many people with disabilities receive Social Security Income (SSI) or Social Security Disability Insurance (SSDI) payments due to their disabilities; these benefits are fixed and may be the sole or vast majority of their income. It is unclear how this change will affect people with fixed unearned incomes; could the same amount of money counted differently result in less food or loss of SNAP eligibility?

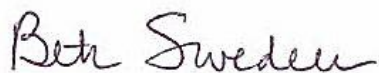
People with disabilities often rely on multiple public programs—including SNAP, Medicaid, Medicare, public housing—to live in their own homes. Changes to these programs can be confusing and destabilize the supports individuals need to successfully live in the community, which can result states and the federal government picking up higher health care and long-term care costs in other public programs. Maintaining state flexibility to set exemption criteria is critical.

Wisconsin's use of broad-based categorical eligibility has given the state flexibility to eliminate benefit cliffs while ensuring low income workers and people with disabilities continue to have access to food. Removing this flexibility actively works against the goals of the SNAP program.

BPDD is charged under the federal Developmental Disabilities Assistance and Bill of Rights Act with advocacy, capacity building, and systems change to improve self-determination, independence, productivity, and integration and inclusion in all facets of community life for people with developmental disabilities.

Our role is to seek continuous improvement across all systems—education, transportation, health care, employment, etc.—that touch the lives of people with disabilities. Our work requires us to have a long-term vision of public policy that not only sees current systems as they are, but how these systems could be made better for current and future generations of people with disabilities.

Thank you for your consideration,

A handwritten signature in cursive script that reads "Beth Swedeen".

Beth Swedeen, Executive Director, Wisconsin Board for People with Developmental Disabilities