

Sarah Shuptrine
Report on Eligibility Policies
and Rules 11/15/93

CLINTON LIBRARY PHOTOCOPY

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WE/FARE
Simplification

Rec'd —

FED X

TODAY

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MEMORANDUM FOR MARY JO BANE

FROM: KATHI WAY

RE: WELFARE SIMPLIFICATION

I have not been able to put together the welfare simplification paper. One flood crisis after another. I am sending you a clean copy of the APWA proposal since that is the starting point.

Sarah is working on a paper that will be more comprehensive and should be available soon. I am sorry for the delay.



AMERICAN PUBLIC WELFARE ASSOCIATION

Kevin W. Concannon, President
A. Sidney Johnson III, Executive Director

PRIORITY ISSUES

RECOMMENDATIONS FOR AFDC/FOOD STAMP SIMPLIFICATION AND COORDINATION

APWA has identified the following priority areas as those that should be implemented in law or regulation as quickly as possible. The issues are taken from the package of simplification and coordination recommendations adopted by the National Council of State Human Service Administrators December 10, 1992.

The five areas are not in any rank order; all are equally important. Issue number citations refer to the item number of the enclosed chart of recommendations dated 4/23/93.

Budget figures have been supplied by the Food and Nutrition Service and the Administration for Children and Families. "Minimal" budget impact indicates a cost so low that it would not be counted for budget purposes.

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I. APPLICATION PROCESS

The initial procedures now required to take and process application information present some of the most time consuming and difficult tasks in administering AFDC and food stamps. States believe current requirements can be greatly streamlined without harm to either the accuracy of case data or to applicants' opportunities to provide necessary information.

Recommendation: Simplify the food stamp program and conform it to AFDC by removing current detailed food stamp requirements and replace them with a policy allowing states to deny an application if the household does not provide requested verification within ten days. Simplify both AFDC and food stamps by allowing states to choose what information to verify. Make optional use of the federal IEVS and SAVE systems. (Issues 4, 5, and 7)

Change required: regulatory and legislative. *Budget impact:* Food stamps, \$3 million savings; AFDC, minimal.

II. CHANGES AND BUDGETING

Many families, particularly in the Food Stamp Program, hold jobs in which wages change frequently. Participants in both programs also experience frequent changes in their family composition and expenses. States are now required to track these fluctuations closely, a policy that results in repeated contact between the family and the eligibility worker and in numerous changes to the case record. Eligibility workers spend inordinate amounts of time tracking and processing these changes; participants must repeatedly contact workers to report changes; and repeated handling of the case budget contributes to payment errors.

Recommendation: Adopt a proposal regarding estimating earned income and change reporting for non monthly reporting requirements in which adjustments in the budget for anticipated income are tied to a change in the income status, not an arbitrary \$25 as in current food stamp policy. This proposal is close to the AFDC policy used in many states. FNS is considering, but has not issued, new regulations which may address some of these concerns. Conform AFDC to food stamp policy regarding the effective date of changes and supplemental benefits to new members. Conform AFDC to food stamps to allow retrospective budgeting of nonmonthly reporters. Conform AFDC to food stamps to eliminate the 10 day reporting requirement for monthly reporters. (Issues 8, 15-17)

Change required: regulatory. *Budget impact* (available to date): minimal.

III. INCOME AND DEDUCTIONS

Perhaps no aspect of eligibility determination is as complex and time-consuming as the calculation of income and deductions from income. Both programs have highly detailed (and frequently different) rules for determining what and how much income is "counted," that is, used in calculating whether a family qualifies for assistance and if so how much. Once income is determined, many families can have their gross income reduced by a variety of expenses and other items deemed necessary for such important purposes as child care or going to work.

Recommendation: Because this issue is so complex, APWA has found it necessary to propose a number of specific recommendations. Briefly, our proposals would completely exclude from consideration several types of income now counted in one or both programs; conform the two programs in the many detailed areas where they now differ; disregard all educational assistance; and conform the programs with respect to dependent care expenses and the incentive disregards for holding a job.

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A particularly difficult issue in this group is that of incentive disregards for wage earners. AFDC and food stamps take substantially different approaches to this issue. Although food stamps is simpler, with its across-the-board deduction of a flat 20 percent, APWA doubts whether this percentage may accurately reflects the true costs of holding a job. Our preliminary recommendation is to broaden the work incentive by increasing it to 30 percent, but we acknowledge the substantial budget costs this change would require. (Issues 18-20, 31-45.)

Change required: legislative. Budget impact (available to date): AFDC, \$15 million; food stamps, \$1.127 billion. Note that almost all costs come from three food stamp issues: the earned income deduction (issue 19), exclusion of HUD utility payments (issue 35), and disregard of the first \$50 of child support payments (issue 45). The latter proposal is contained in the Mickey Leland Act food stamp legislation now in the House reconciliation package.

IV. RECERTIFICATION AND REDETERMINATION

Both AFDC and food stamps provide for renewal or extension of eligibility once a family is receiving assistance. Cases are "redetermined" in AFDC and "recertified" in food stamps through repeating some of the same interview and documentary processes required for initial application. However, the two programs take a fundamentally different approach to this issue: in AFDC, a family is considered eligible continuously until determined otherwise through the redetermination process or other change. In food stamps, a family's eligibility is finite and endures only for the "certification period" assigned based on stability of income and other factors. This fact and other substantial differences have made the recertification/redetermination process extremely cumbersome when any attempt is made to coordinate the handling of both programs for a given family.

Recommendation: Allow an "open-ended" authorization of benefits for all families in both programs, with required reviews of cases at least every 24 months. (Issues 46-47)

Change required: legislative. Budget impact: not yet determined.

V. RESOURCES

Both AFDC and food stamps allow eligible households to have certain resources--an amount of cash on hand and certain items of property, such as their home and personal items. Beyond that simple statement the two programs diverge substantially, and have different rules for both amounts and allowable categories of resources. The issue is a constant source of difficulty for both staff and participants.

Recommendation: In many areas of resource policy our proposal is straightforward and causes minimal budgetary impact. We recommend common definitions of excluded property, like treatment of the value of insurance and burial plans, and the same cash on hand limit. With regard to allowable vehicles, however, our proposal is somewhat more problematic. We believe the simplest and most equitable policy would be the complete exclusion of one vehicle per household, regardless of value, and the counting of the equity value of any other licensed vehicles. However, this change would cost \$991 million in food stamps and \$736 million in AFDC. Nevertheless we support this policy as one that serves the best interests of administrators and clients alike. We note that the Mickey Leland Act would allow vehicles in the Food Stamp Program with higher values than at present, a policy that perhaps could be merged with elements of our proposal. (Issues 48-55)

Change required: regulatory and legislative. Budget impact: food stamps, \$991 million; AFDC, \$736 million.

Revised 6-28-93

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Change required: regulatory and legislative. **Budget impact:** food stamps, \$991 million; AFDC, \$736 million.

Revised 6-28-93

APWA TASK FORCE ON PROGRAM COORDINATION
STATUS OF RECOMMENDATIONS
a=Minimal budgetary impact c=Savings if AFDC conforms to FSP
b=Not estimated d=Not available at time of printing

ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	STATUS FOLLOWING MARCH APWA MEETING
3. APPLICATION PROCESS: APPLICATION FORM	THE AGENCY SHALL REQUIRE A WRITTEN APPLICATION, SIGNED UNDER PENALTY OF PERJURY, ON A FORM PRESCRIBED BY THE STATE, FROM THE APPLICANT OR AUTHORIZED REPRESENTATIVE.	ACT CONTAINS SPECIFIC REQUIREMENTS FOR APPLICATION CONTENT, MANDATES USE OF A SIMPLIFIED, UNIFORM NATIONAL FORM OR APPROVED SUBSTITUTE, AND REQUIRES A COMBINED APPLICATION FOR PA HOUSEHOLDS AND GA HOUSEHOLDS IF STATE HAS STATEWIDE GA APPLICATION FORM.	FNS AND ACF JOINTLY DEVELOP A GENERIC RIGHTS AND RESPONSIBILITIES DOCUMENT. AMEND FOOD STAMP ACT TO ELIMINATE REQUIREMENTS FOR SPECIFIC APPLICATION LANGUAGE AND REQUIREMENT THAT STATE AGENCIES USE APPLICATION APPROVED BY FNS.	ACCEPTED RECOMMENDATION, SUBJECT TO ADDITIONAL STATE COMMENTS ON PROPOSED LANGUAGE.	LAW	a	a	FNS AND ACF DEVELOPED EASY-TO-READ STATEMENTS OF RIGHTS AND RESPONSIBILITIES THAT ARE GENERIC TO THE EXTENT POSSIBLE. STATEMENTS BEING REVISED TO INCORPORATE APWA COMMENTS.
4. APPLICATION PROCESS: DELAY PROCEDURES	NO CORRESPONDING REQUIREMENT.	REGULATIONS PROVIDE DETAILED PROCEDURES AGENCY MUST FOLLOW IF HOUSEHOLD'S ELIGIBILITY IS NOT DETERMINED WITHIN 30 DAYS AFTER APPLICATION.	FOOD STAMPS SHOULD CONFORM WITH AFDC.	ACCEPTED RECOMMENDATION.	REG	a	n/a	SEE PROCESSING STANDARDS.

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1. ADMINISTRATIVE WAIVER AUTHORITY	DEMONSTRATION WAIVER AUTHORITY PROVIDED IN STATUTE. THERE IS NO ADMINISTRATIVE WAIVER AUTHORITY SIMILAR TO THAT IN THE FOOD STAMP PROGRAM.	7 CFR 272.3(c) ALLOWS WAIVERS OF REGULATORY PROVISIONS FOR EXTRAORDINARY TEMPORARY SITUATIONS, MORE EFFECTIVE AND EFFICIENT ADMINISTRATION OF THE PROGRAM, OR UNIQUE GEOGRAPHIC OR CLIMATIC CONDITIONS.	(1) SUPPORT THE EFFORT OF THE ADMINISTRATION FOR CHILDREN AND FAMILIES TO AMEND 45 CFR TO PERMIT APPROVAL OF ADMINISTRATIVE WAIVERS. (2) AMEND FOOD STAMP ACT TO CONFORM WITH AFDC DEMONSTRATION WAIVER AUTHORITY.	1) ACCEPTED RECOMMENDATION, EXCEPT VOTED TO MAINTAIN FSP AVERAGE BENEFIT LEVEL. 2) APWA TO DISCUSS WITH ADVOCATES. WILL BE DROPPED IF ADVOCATES CONTINUE TO OPPOSE RECOMMENDATION.	REG	a	a	PROPOSED ACF ADMINISTRATIVE WAIVER ON HOLD.
2. APPLICATION PROCESS: ALIEN/CITIZENSHIP DECLARATION	EACH ADULT MUST ATTEST TO HIS/HER ALIEN OR CITIZENSHIP STATUS. ONE ADULT MAY SIGN FOR ALL CHILDREN.	THE APPLICATION FORM MUST INCLUDE A STATEMENT TO BE SIGNED BY ONE ADULT HOUSEHOLD MEMBER CERTIFYING THAT THE INFORMATION IN THE APPLICATION IS TRUE, INCLUDING INFORMATION ABOUT THE CITIZENSHIP OR ALIEN STATUS OF HOUSEHOLD MEMBERS.	AMEND SOCIAL SECURITY ACT TO ELIMINATE REQUIREMENT THAT EACH ADULT SIGN DECLARATION.	ACCEPTED RECOMMENDATION.	LAW	n/a	a	ALIEN DECLARATION PROVISION WAS IN HR 11 AND WILL BE INTRODUCED AGAIN.

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4. APPLICATION PROCESS: DELAY PROCEDURES	NO CORRESPONDING REQUIREMENT.	REGULATIONS PROVIDE DETAILED PROCEDURES AGENCY MUST FOLLOW IF HOUSEHOLD'S ELIGIBILITY IS NOT DETERMINED WITHIN 30 DAYS AFTER APPLICATION.	FOOD STAMPS SHOULD CONFORM WITH AFDC.	ACCEPTED RECOMMENDATION.	REG	a	n/a	SEE PROCESS STANDARDS.

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5. APPLICATION PROCESS: PROCESSING STANDARDS	A DECISION MUST BE REACHED WITHIN STATE-SET STANDARDS, NOT TO EXCEED 45 DAYS. STATES MUST PROVIDE BENEFITS FROM THE EARLIER OF THE DATE OF AUTHORIZATION OR 30 DAYS FROM APPLICATION. THEY MAY PROVIDE PRORATED BENEFITS FROM THE DATE OF APPLICATION.	CLIENTS MUST RECEIVE BENEFITS RETROACTIVE TO THE DATE OF APPLICATION WITHIN 30 DAYS OF APPLICATION UNDER NORMAL PROCESSING AND WITHIN 5 DAYS FOR EXPEDITED SERVICE.	ALLOW STATES TO DENY APPLICATION IF HOUSEHOLD DOES NOT PROVIDE REQUESTED VERIFICATION WITHIN 10 DAYS.	ACCEPTED RECOMMENDATION TO HAVE FNS MAKE AVAILABLE TO STATES THE OPTION TO DENY CASE AFTER 10 DAYS IF REQUESTED VERIFICATION IS NOT RECEIVED. REINSTATEMENT REQUIRED IF HH COMPLIES.	REG	a	n/a	
6. APPLICATION PROCESS: SCHEDULING SECOND INTERVIEW	CLIENT MUST BE NOTIFIED ORALLY AND IN WRITING OF RIGHTS AND RESPONSIBILITIES. THERE IS NO REQUIREMENT FOR THE AGENCY TO RESCHEDULE A MISSED INTERVIEW.	REGULATIONS REQUIRE AGENCY TO RESCHEDULE INTERVIEW IF CLIENT DOES NOT APPEAR FOR THE ONE ORIGINALLY SCHEDULED.	ELIMINATE REQUIREMENT TO SCHEDULE SECOND APPOINTMENT.	ACCEPTED RECOMMENDATION.	REG	a	n/a	

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7. APPLICATION PROCESS: VERIFICATION	INCOME MUST BE VERIFIED THROUGH IEVS, SOCIAL SECURITY NUMBERS THROUGH SSA, AND ALIEN DOCUMENTS THROUGH SAVE. STATES MAY ESTABLISH OTHER VERIFICATION REQUIREMENTS. DECISIONS RE ELIGIBILITY OR INELIGIBILITY MUST BE SUPPORTED BY FACTS IN THE CASE RECORD.	IN ADDITION TO REQUIRED VERIFICATION THROUGH IEVS AND SAVE, REGULATIONS MANDATE VERIFICATION OF INCOME, ALIEN STATUS, UTILITY AND MEDICAL EXPENSES (WHEN ACTUAL IS CLAIMED), SSN, IDENTITY, RESIDENCY, DISABILITY, AND HOUSEHOLD COMPOSITION (IF QUESTIONABLE)	SIMPLIFY VERIFICATION REQUIREMENTS SO STATES CAN DECIDE WHAT TO VERIFY. MAKE USE OF IEVS AND SAVE OPTIONAL.	ACCEPTED RECOMMENDATION.	LAW	\$-3	a	
8. BUDGETING (PROSPECTIVE): BEST ESTIMATE/ANTICIPATING INCOME	USES BEST ESTIMATE OF INCOME AND CIRCUMSTANCES BASED ON THE AGENCY'S REASONABLE EXPECTATION AND KNOWLEDGE OF CURRENT, PAST AND FUTURE CIRCUMSTANCES. INTERMITTENT INCOME MAY BE PRORATED.	INCOME RECEIVED DURING THE PAST 30 DAYS IS USED AS AN INDICATOR OF FUTURE INCOME, WITH SPECIFIED EXCEPTIONS. IF THE AMOUNT OF INCOME OR DATE THAT IT WILL BE RECEIVED IS UNCERTAIN, IT IS NOT USED. HOUSEHOLDS MAY ELECT TO HAVE INCOME AVERAGED.	ADOPT AFDC POLICY FOR FSP. AFDC POLICY IS LESS ERROR-PRONE AND ALLOWS WORKERS MORE FLEXIBILITY.	ACCEPTED RECOMMENDATION, SUBJECT TO ADDITIONAL STATE COMMENTS ON PROPOSED LANGUAGE.	REG	a	n/a	FNS DRAFTING RULE WITH CHANGES IN PROCEDURES FOR ANTICIPATING INCOME.

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9. BUDGETING (RETROSPECTIVE): INCOME FROM A TERMINATED SOURCE	INCOME RECEIVED IN THE BEGINNING MONTHS FROM A NONCONTINUOUS SOURCE WHICH WAS COUNTED PROSPECTIVELY IS DISREGARDED IN THE FIRST AND SECOND MONTHS OF RETROSPECTIVE BUDGETING. THE DISREGARD DOES NOT APPLY IF INCOME IS RECEIVED AGAIN FROM A SIMILAR SOURCE.	INCOME RECEIVED IN BEGINNING MONTHS FROM A TERMINATED SOURCE WHICH WAS COUNTED PROSPECTIVELY IS DISREGARDED FOR THE FIRST AND SECOND MONTHS OF RETROSPECTIVE BUDGETING. THE DISREGARD APPLIES UNLESS INCOME WAS RECEIVED AGAIN FROM THE SAME FUNDING SOURCE	DIFFERENCE NO LONGER EXISTS. [FNS COMMENT: MAJOR DIFFERENCE IN LENGTH OF DISREGARD NO LONGER EXISTS. THERE IS A MINOR DIFFERENCE IN THE DEFINITION OF WHAT CONSTITUTES A TERMINATED SOURCE.]	DROPPED.		n/a	n/a	
10. BUDGETING (RETROSPECTIVE): SUSPENSION	IF INELIGIBILITY WILL BE FOR ONE MONTH ONLY, ASSISTANCE MAY BE SUSPENDED IN THE PAYMENT MONTH BASED ON INCOME AND CIRCUMSTANCES IN THE BUDGET MONTH. UNIT MUST GENERALLY BE BUDGETED RETROSPECTIVELY THE MONTH AFTER SUSPENSION.	REGULATIONS GIVE STATES OPTION OF SUSPENDING HOUSEHOLDS PROSPECTIVELY IF INELIGIBILITY WILL EXIST FOR ONE MONTH ONLY. HOUSEHOLDS MUST BE BUDGETED RETROSPECTIVELY THE MONTH AFTER SUSPENSION.	IN BOTH PROGRAMS SUSPEND RETROSPECTIVELY IF THERE IS A ONE-TIME CHANGE IN INCOME WHICH CAUSES INELIGIBILITY. CONTINUE RETROSPECTIVE BUDGETING CYCLE UNLESS THERE IS A CHANGE WHICH BY LAW OR STATE OPTION CAUSES PROSPECTIVE BUDGETING.	ACCEPTED RECOMMENDATION.	REG	a	a	RETROSPECTIVE SUSPENSION INCLUDED IN DRAFT FSP SIMPLIFICATION RULE.

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11. BUDGETING: CONVERTING INCOME TO A MONTHLY AMOUNT	NO PROVISION, BUT STATES MAY USE CONVERSION IN CALCULATING A BEST ESTIMATE FOR CONSISTENCY WITH FOOD STAMPS.	INCOME RECEIVED WEEKLY MAY BE MULTIPLIED BY 4.3 AND BIWEEKLY INCOME BY 2.15 TO ARRIVE AT A MONTHLY FIGURE, OR THE STATE'S PUBLIC ASSISTANCE CONVERSION FACTOR MAY BE USED.	AMEND AFDC REGULATION TO MAKE CONVERSION FACTORS CONSISTENT WITH FSP REGULATIONS.	DROPPED.		n/a	n/a	DROPPED BECAUSE STATES CAN USE CONSISTENT PROCEDURES WITHOUT REGULATION.
12. BUDGETING: PRORATION OF CONTRACT AND SELF-EMPLOYMENT INCOME	ALLOWS STATES TO AVERAGE OR PRORATE CONTRACT INCOME OVER THE PERIOD OF THE CONTRACT AND SELF-EMPLOYMENT INCOME OVER THE PERIOD THE INCOME COVERS.	REQUIRES ANNUALIZING CONTRACT AND SELF-EMPLOYMENT INCOME RECEIVED IN A PERIOD SHORTER THAN ONE YEAR IF IT IS THE HOUSEHOLD'S ANNUAL INCOME. IF INCOME IS NOT THE HOUSEHOLD'S ANNUAL INCOME, IT IS PRORATED OVER THE PERIOD IT IS INTENDED TO COVER.	NO DIFFERENCE EXISTS BECAUSE AFDC REGULATIONS ALLOW INCOME TO BE PRORATED OVER THE PERIOD THE CONTRACT COVERS OR COUNTED IN THE MONTH IT IS RECEIVED.	NO CHANGE IN CURRENT REGULATIONS IS NEEDED.		n/a	n/a	

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13. CHANGES: EFFECTIVE DATE	CHANGE THAT RESULTS IN OVERPAYMENT OR UNDERPAYMENT IS EFFECTIVE IN THE MONTH OF THE CHANGE.	EFFECTIVE DATE DEPENDS ON TIME FRAMES FOR REPORTING AND ACTING ON CHANGES.	AFDC SHOULD CONFORM TO FSP POLICY ON EFFECTIVE DATE. APPLY TO BOTH PROSPECTIVE AND RETROSPECTIVE BUDGETING. ADOPT AFDC PAYMENT ADJUSTMENT LAG (PAL) QC CONCEPT FOR FSP. ADOPT FSP OVERPAYMENT ESTABLISHMENT AND CLAIMS COLLECTION POLICY FOR AFDC.	ACCEPTED RECOMMENDATION.	REG	\$5c	\$-17	
14. CHANGES: MONTHLY REPORTING AND BUDGETING REQUIREMENTS	MONTHLY REPORTING IS OPTIONAL. HOUSEHOLDS NOT REQUIRED TO REPORT MONTHLY MUST BE BUDGETED PROSPECTIVELY UNLESS WAIVER HAS BEEN GRANTED FOR CONSISTENCY WITH FSP.	MONTHLY REPORTING IS OPTIONAL, BUT PROHIBITED FOR CERTAIN CATEGORIES OF HOUSEHOLDS THAT MUST BE BUDGETED PROSPECTIVELY. OTHER HOUSEHOLDS NOT REQUIRED TO REPORT MONTHLY MAY BE BUDGETED PROSPECTIVELY OR RETROSPECTIVELY.	CHANGE AFDC LEGISLATION TO ALLOW NONMONTHLY REPORTING HOUSEHOLDS TO BE BUDGETED RETROSPECTIVELY.	ACCEPTED RECOMMENDATION.	LAW	n/a	a	WAS IN HR 11.

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15. CHANGES: NOTICE OF ADVERSE ACTION	ADVANCE NOTICE NOT REQUIRED WHEN, AMONG OTHER REASONS, MAIL IS RETURNED WITHOUT A FORWARDING ADDRESS.	NOTICE OF ADVERSE ACTION REQUIRED BY 7 CFR 273.13 NOT REQUIRED WHEN, AMONG OTHER REASONS, THE HOUSEHOLD VOLUNTARILY REQUESTS IN THE PRESENCE OF A CASEWORKER THAT ITS PARTICIPATION BE TERMINATED.	CONFORM TO FSP POLICY RE TOLL-FREE NUMBER AND LEGAL AID REFERRAL ON NOTICE, MASS CHANGES, AND VOLUNTARY TERMINATION OF PARTICIPATION. CONFORM TO AFDC POLICY RE RETURNED MAIL.	COMMITTEE RECOMMENDED DROPPING ISSUE OF TOLL-FREE NUMBER AND LEGAL AID INFO. ACCEPTED OTHER RECOMMENDATIONS.	REG	a	a	PROVISION REGARDING RETURNED MAIL INCLUDED IN FSP PROPOSED SIMPLIFICATION RULE.
16. CHANGES: REPORTING REQUIREMENTS	RECIPIENTS MUST REPORT PROMPTLY ALL CHANGES IN INCOME, RESOURCES AND OTHER CIRCUMSTANCES AFFECTING ELIGIBILITY OR BENEFITS AS THEY BECOME AWARE OF THEM AND ALSO ON MONTHLY REPORT IF MONTHLY REPORTING IS REQUIRED.	MONTHLY REPORTING HOUSEHOLDS NEED NOT REPORT CHANGES OUTSIDE MONTHLY REPORT FORM. CHANGE REPORTERS MUST REPORT CHANGES IN INCOME AND MEDICAL EXPENSES OF MORE THAN \$25, HOUSEHOLD COMPOSITION, RESIDENCE, LIQUID RESOURCES, AND VEHICLES WITHIN 10 DAYS.	HOUSEHOLD/ASSISTANCE UNIT REQUIRED TO REPORT ONLY CHANGES IN SOURCE OF INCOME, RATE OF PAY, EMPLOYMENT STATUS, CHANGE OF ADDRESS, HOUSEHOLD/UNIT COMPOSITION. CHANGE AFDC REGULATIONS TO REQUIRE MONTHLY REPORTERS TO REPORT CHANGES ONLY ON MONTHLY REPORT.	ACCEPTED RECOMMENDATIONS.	REG	b	b	SIMILAR CHANGE IN REPORTING REQUIREMENTS FOR EARNINGS IN FSP DRAFT RULE.

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15. CHANGES: NOTICE OF ADVERSE ACTION	ADVANCE NOTICE NOT REQUIRED WHEN, AMONG OTHER REASONS, MAIL IS RETURNED WITHOUT A FORWARDING ADDRESS.	NOTICE OF ADVERSE ACTION REQUIRED BY 7 CFR 273.13 NOT REQUIRED WHEN, AMONG OTHER REASONS, THE HOUSEHOLD VOLUNTARILY REQUESTS IN THE PRESENCE OF A CASEWORKER THAT ITS PARTICIPATION BE TERMINATED.	CONFORM TO FSP POLICY RE TOLL-FREE NUMBER AND LEGAL AID REFERRAL ON NOTICE, MASS CHANGES, AND VOLUNTARY TERMINATION OF PARTICIPATION. CONFORM TO AFDC POLICY RE RETURNED MAIL.	COMMITTEE RECOMMENDED DROPPING ISSUE OF TOLL-FREE NUMBER AND LEGAL AID INFO. ACCEPTED OTHER RECOMMENDATIONS.	REG	a	a	PROVISION REGARDING RETI MAIL INCLUDED IN FSP PROPOSED SIMPLIFICATION RULE.
16. CHANGES: REPORTING REQUIREMENTS	RECIPIENTS MUST REPORT PROMPTLY ALL CHANGES IN INCOME, RESOURCES AND OTHER CIRCUMSTANCES AFFECTING ELIGIBILITY OR BENEFITS AS THEY BECOME AWARE OF THEM AND ALSO ON MONTHLY REPORT IF MONTHLY REPORTING IS REQUIRED.	MONTHLY REPORTING HOUSEHOLDS NEED NOT REPORT CHANGES OUTSIDE MONTHLY REPORT FORM. CHANGE REPORTERS MUST REPORT CHANGES IN INCOME AND MEDICAL EXPENSES OF MORE THAN \$25, HOUSEHOLD COMPOSITION, RESIDENCE, LIQUID RESOURCES, AND VEHICLES WITHIN 10 DAYS.	HOUSEHOLD/ASSISTANCE UNIT REQUIRED TO REPORT ONLY CHANGES IN SOURCE OF INCOME, RATE OF PAY, EMPLOYMENT STATUS, CHANGE OF ADDRESS, HOUSEHOLD/UNIT COMPOSITION. CHANGE AFDC REGULATIONS TO REQUIRE MONTHLY REPORTERS TO REPORT CHANGES ONLY ON MONTHLY REPORT.	ACCEPTED RECOMMENDATIONS.	REG	b	b	SIMILAR CHANGE IN REPORTING REQUIREMENTS FOR EARNINGS IN FSP DRAFT RULE.

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17. CHANGES: SUPPLEMENTAL BENEFITS FOR NEW MEMBERS	NEW PERSON IS TREATED AS AN APPLICANT AND ADDED THE DATE HE/SHE ENTERED THE HOUSEHOLD OR DATE DETERMINED ELIGIBLE. SUPPLEMENTAL BENEFITS ARE ISSUED.	SUPPLEMENTAL BENEFITS MAY BE ISSUED FOR A NEW MEMBER IN MONTH OF REPORTED CHANGE UNDER PROSPECTIVE BUDGETING. SUPPLEMENTAL BENEFITS MAY NOT BE ISSUED UNDER RETROSPECTIVE BUDGETING FOR MONTH OF CHANGE, BUT ALLOTMENT MAY BE INCREASED IF NOT ALREADY ISSUED.	CONFORM AFDC TO FOOD STAMP POLICY.	ACCEPTED RECOMMENDATION.	REG	a	d	
18. DEDUCTIONS: DEPENDENT CARE	FOR FULLTIME WORKERS AND JOBS PARTICIPANTS: ACTUAL COSTS UP TO \$175 PER MO. PER DEPENDENT CHILD 2 AND OVER OR INCAPACITATED ADULT LIVING IN SAME HOME AND RECEIVING AFDC AND UP TO \$200 PER MO. PER CHILD UNDER 2. STATE MAY SET LESSER AMOUNT FOR PARTTIME.	ACTUAL NOT TO EXCEED \$160 PER CHILD OR OTHER DEPENDENT WHEN CARE IS NEEDED TO ACCEPT OR CONTINUE EMPLOYMENT, OR TRAINING OR EDUCATION THAT IS PREPARATORY TO EMPLOYMENT.	SET LIMITS AT \$175 PER INDIVIDUAL (\$200 FOR CHILDREN UNDER TWO). ALLOW DEDUCTION FOR SEEKING EMPLOYMENT, EMPLOYMENT, OR ATTENDING TRAINING OR SCHOOL. SUBTRACT DEDUCTION FROM HOUSEHOLD OR UNIT'S INCOME AFTER OTHER DEDUCTIONS HAVE BEEN SUBTRACTED.	DECIDED TO DELETE LAST SENTENCE. RECOMMENDED THAT AFDC CAPS FOR DEPENDENT CARE BE USED AND DEDUCTION BE ALLOWED FROM UNEARNED INCOME FOR TRAINING/EDUCATION IN BOTH PROGRAMS.	LAW	\$1	b	IN LELAND BILL.

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19. DEDUCTIONS: EA) INCOME DEDUCTION	DISREGARDS \$90 OF INDIVIDUAL'S EARNINGS. \$30 AND ONE-THIRD OF REMAINDER DISREGARDED IN 4 CONSECUTIVE MONTHS. THEN \$30 DISREGARDED IN 8 CONSECUTIVE MONTHS. NOT ALLOWED AGAIN UNTIL PERSON OFF AFDC FOR 12 CONSECUTIVE MONTHS.	DEDUCTS 20 PERCENT OF ALL EARNINGS.	DEDUCT 30 PERCENT OF GROSS EARNED INCOME IN ANY MONTH THE HOUSEHOLD OR ASSISTANCE UNIT HAD EARNINGS AS EARNED INCOME DEDUCTION FOR BOTH PROGRAMS.	ADDITIONAL DATA ON LAW EXPENSES NEEDED. WORK INCENTIVES MAY BE AN AREA FOR CONSIDERATION BY THE WELFARE ADVISORY COMMITTEE.		\$778	b	FNS TO PROVIDE COST DATA.
20. DEDUCTIONS:) INCOME DEDUCTION PENALTY	\$90, \$30 AND ONE-THIRD, WHEN CALCULATING DEPENDENT CARE DISREGARDS OVERISSUANCE, EARNED INCOME DEDUCTION IS NOT ALLOWED IF INDIVIDUAL VOLUNTARILY QUIT OR FAILED TO ACCEPT JOB, RETURN MONTHLY REPORT MEMBER WILLFULLY FAILED TIMELY, OR REQUESTED CASE TO REPORT. TERMINATION TO AVOID RECEIVING \$30 AND ONE-THIRD DISREGARD FOR 4 CONSECUTIVE MONTHS.		DO NOT ALLOW EARNED INCOME DEDUCTION IN ANY MONTH THE INCOME WAS NOT REPORTED BY THE HOUSEHOLD OR ASSISTANCE UNIT, WHETHER THROUGH INTENTIONAL PROGRAM VIOLATION OR INADVERTENT CLIENT ERROR. DISALLOWANCE AFFECTS CALCULATION OF OVERPAYMENTS, NOT BENEFITS.	ACCEPTED RECOMMENDATION.	LAW	\$-1	a	

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19. DEDUCTIONS: EARNED INCOME DEDUCTION	DISREGARDS \$90 OF INDIVIDUAL'S EARNINGS. \$30 AND ONE-THIRD OF REMAINDER DISREGARDED IN 4 CONSECUTIVE MONTHS. THEN \$30 DISREGARDED IN 8 CONSECUTIVE MONTHS. NOT ALLOWED AGAIN UNTIL PERSON OFF AFDC FOR 12 CONSECUTIVE MONTHS.	DEDUCTS 20 PERCENT OF ALL EARNINGS.	DEDUCT 30 PERCENT OF GROSS EARNED INCOME IN ANY MONTH THE HOUSEHOLD OR ASSISTANCE UNIT HAD EARNINGS AS EARNED INCOME DEDUCTION FOR BOTH PROGRAMS.	ADDITIONAL DATA ON LAW EXPENSES NEEDED. WORK INCENTIVES MAY BE AN AREA FOR CONSIDERATION BY THE WELFARE ADVISORY COMMITTEE.		\$778	b	FNS TO PROVIDE COST DATA.
20. DEDUCTIONS: EARNED INCOME DEDUCTION PENALTY	\$90, \$30 AND ONE-THIRD, DEPENDENT CARE DISREGARDS NOT ALLOWED IF INDIVIDUAL VOLUNTARILY QUIT OR FAILED TO ACCEPT JOB, RETURN MONTHLY REPORT TIMELY, OR REQUESTED CASE TERMINATION TO AVOID RECEIVING \$30 AND ONE-THIRD DISREGARD FOR 4 CONSECUTIVE MONTHS.	WHEN CALCULATING OVERISSUANCE, EARNED INCOME DEDUCTION IS NOT ALLOWED ON PORTION OF EARNED INCOME HOUSEHOLD MEMBER WILLFULLY FAILED TO REPORT.	DO NOT ALLOW EARNED INCOME DEDUCTION IN ANY MONTH THE INCOME WAS NOT REPORTED BY THE HOUSEHOLD OR ASSISTANCE UNIT, WHETHER THROUGH INTENTIONAL PROGRAM VIOLATION OR INADVERTENT CLIENT ERROR. DISALLOWANCE AFFECTS CALCULATION OF OVERPAYMENTS, NOT BENEFITS.	ACCEPTED RECOMMENDATION.	LAW	\$-1	a	

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21. DEDUCTIONS: EXCESS MEDICAL DEDUCTION	N/A	A DEDUCTION IS ALLOWED FOR THAT PORTION OF MEDICAL EXPENSES IN EXCESS OF \$35 PER MONTH INCURRED BY ANY HOUSEHOLD MEMBER WHO IS ELDERLY OR DISABLED.	AUTHORIZE A TWO-TIERED STANDARD FOR EACH STATE TO BE CALCULATED BY EACH STATE AND APPROVED BY FNS.	AGREED TO RECOMMEND THAT MEDICAL DEDUCTION BE ELIMINATED AND THAT HOUSEHOLDS ADVERSELY AFFECTED BE COMPENSATED BY OTHER CHANGE, POSSIBLY IN MINIMUM BENEFIT LEVEL.	LAW	\$-87	n/a	
22. DEDUCTIONS: STANDARD SHELTER DEDUCTION	N/A	A DEDUCTION IS ALLOWED FOR ACTUAL SHELTER EXPENSES IN EXCESS OF 50 PERCENT OF THE HOUSEHOLD'S NET INCOME UP TO AN ANNUALLY UPDATED CAP, CURRENTLY SET AT \$194. HOUSEHOLDS CONTAINING AN ELDERLY OR DISABLED MEMBER ARE NOT SUBJECT TO THE CAP.	ELIMINATE THE REQUIREMENT TO REPORT CHANGES IN SHELTER DURING THE CERTIFICATION PERIOD. LET EACH STATE DEVELOP A STANDARD SHELTER EXPENSE USING FNS-DEVELOPED GUIDELINES. HOUSEHOLD WOULD VERIFY TO GET ACTUAL IF HIGHER.	ACCEPTED RECOMMENDATION RE NO REQUIRED REPORTING OF CHANGES IN SHELTER DURING CERT PERIOD. RECOMMENDED FNS ALLOW STATES TO CONDUCT DEMO PROJECTS USING STANDARD SHELTER EXPENSE.	LAW	b	n/a	MODIFICATION OF CURRENT DEMONSTRATION PROJECT AUTHORITY NEEDED TO ALLOW DEMONSTRATION PROJECTS WHICH USE STANDARD AND DO NOT ALLOW HOUSEHOLD OPTION TO USE HIGHER ACTUAL COSTS.

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23. ELIGIBILITY: ALIEN STATUS	ALLOWS PARTICIPATION BY ALIENS ADMITTED FOR PERMANENT RESIDENCE OR PERMANENTLY RESIDING UNDER COLOR OF LAW (PRUCOL).	FOOD STAMP ACT LIMITS ALIEN PARTICIPATION TO THOSE ADMITTED UNDER SPECIFIED SECTIONS OF THE IMMIGRATION AND NATIONALITY ACT.	ADOPT AFDC PRUCOL PROVISION FOR FSP.	ACCEPTED RECOMMENDATION.	LAW	a	n/a	ACF AND FNS TO EXPLORE COMMITTEE REQUEST TO CLASSIFY ALIENS BY TYPE OF DOCUMENTATION.
24. ELIGIBILITY: CERTIFIED UNIT	ASSISTANCE UNIT CONSISTS OF DEPENDENT CHILDREN UNDER 18 (OR 18 IF IN SCHOOL AND WILL FINISH BEFORE 19) DEPRIVED OF PARENTAL SUPPORT AND LIVING IN THE HOME OF THE PARENT OR SPECIFIED RELATIVES. THE NEEDS, INCOME AND RESOURCES OF ALL IN UNIT ARE INCLUDED.	HOUSEHOLD USUALLY CONSISTS OF PERSONS WHO PURCHASE AND PREPARE MEALS TOGETHER. PARENTS AND CHILDREN AND SIBLINGS MAY NOT BE SEPARATE HOUSEHOLDS UNLESS THE PARENT OR SIBLING IS OVER 60 OR DISABLED OR THE CHILD OR SIBLING HAS A MINOR CHILD.	RECOMMENDS NO CHANGE IN DEFINITIONS OF CERTIFIED UNIT BECAUSE OF FUNDAMENTAL DIFFERENCES IN THE PROGRAMS. POSSIBLE ANSWER WOULD BE USE OF STANDARDIZED ALLOTMENTS FOR JOINT FSP/AFDC HOUSEHOLDS.	ACCEPTED RECOMMENDATION. STANDARDIZED ALLOTMENTS OPTION DROPPED.		n/a	n/a	LELAND BILL CONTAINS CHANGES IN FOOD STAMP HOUSEHOLD DEFINITION.
25. ELIGIBILITY: CHILD SUPPORT ASSIGNMENT AND COOPERATION	ASSIGNING TO THE STATE AGENCY ANY RIGHTS TO CHILD OR SPOUSAL SUPPORT AND COOPERATING WITH THE CHILD SUPPORT COLLECTION AGENCY IN ESTABLISHING PATERNITY AND OBTAINING SUPPORT PAYMENTS ARE CONDITIONS OF ELIGIBILITY.	NO COMPARABLE PROVISION.	CHILD SUPPORT COOPERATION SHOULD BE STATE OPTION. SAME GOOD CAUSE CRITERIA AS AFDC. DISREGARD FIRST \$50 OF CHILD SUPPORT. PROVIDE FEDERAL FINANCIAL INCENTIVES AND FFP AT CHILD SUPPORT FFP LEVEL. WAIVE INITIAL FEE.	ACCEPTED RECOMMENDATION THAT IN FSP: 1) FAMILIES BE ENCOURAGED TO COOPERATE WITH CHILD SUPPORT. 2) OPPOSE LEGISLATION TO REQUIRE COOPERATION WITH CHILD SUPPORT. 3) DISREGARD \$50.	LAW	n/a	n/a	

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23. ELIGIBILITY: ALIEN STATUS	ALLOWS PARTICIPATION BY ALIENS ADMITTED FOR PERMANENT RESIDENCE OR PERMANENTLY RESIDING UNDER COLOR OF LAW (PRUCOL).	FOOD STAMP ACT LIMITS ALIEN PARTICIPATION TO THOSE ADMITTED UNDER SPECIFIED SECTIONS OF THE IMMIGRATION AND NATIONALITY ACT.	ADOPT AFDC PRUCOL PROVISION FOR FSP.	ACCEPTED RECOMMENDATION.	LAW	a	n/a	ACF AND FNS TO EXPLORE COMMITTEE REQUEST TO CLASSIFY ALIENS BY TYPE OF DOCUMENTATION.
24. ELIGIBILITY: CERTIFIED UNIT	ASSISTANCE UNIT CONSISTS OF DEPENDENT CHILDREN UNDER 18 (OR 18 IF IN SCHOOL AND WILL FINISH BEFORE 19) DEPRIVED OF PARENTAL SUPPORT AND LIVING IN THE HOME OF THE PARENT OR SPECIFIED RELATIVES. THE NEEDS, INCOME AND RESOURCES OF ALL IN UNIT ARE INCLUDED.	HOUSEHOLD USUALLY CONSISTS OF PERSONS WHO PURCHASE AND PREPARE MEALS TOGETHER. PARENTS AND CHILDREN AND SIBLINGS MAY NOT BE SEPARATE HOUSEHOLDS UNLESS THE PARENT OR SIBLING IS OVER 60 OR DISABLED OR THE CHILD OR SIBLING HAS A MINOR CHILD.	RECOMMENDS NO CHANGE IN DEFINITIONS OF CERTIFIED UNIT BECAUSE OF FUNDAMENTAL DIFFERENCES IN THE PROGRAMS. POSSIBLE ANSWER WOULD BE USE OF STANDARDIZED ALLOTMENTS FOR JOINT FSP/AFDC HOUSEHOLDS.	ACCEPTED RECOMMENDATION. STANDARDIZED ALLOTMENTS OPTION DROPPED.		n/a	n/a	LELAND BILL CONTAINS CHANGES IN FOOD STAMP HOUSEHOLD DEFINITION.
25. ELIGIBILITY: CHILD SUPPORT ASSIGNMENT AND COOPERATION	ASSIGNING TO THE STATE AGENCY ANY RIGHTS TO CHILD OR SPOUSAL SUPPORT AND COOPERATING WITH THE CHILD SUPPORT COLLECTION AGENCY IN ESTABLISHING PATERNITY AND OBTAINING SUPPORT PAYMENTS ARE CONDITIONS OF ELIGIBILITY.	NO COMPARABLE PROVISION.	CHILD SUPPORT COOPERATION SHOULD BE STATE OPTION. SAME GOOD CAUSE CRITERIA AS AFDC. DISREGARD FIRST \$50 OF CHILD SUPPORT. PROVIDE FEDERAL FINANCIAL INCENTIVES AND FFP AT CHILD SUPPORT FFP LEVEL. WAIVE INITIAL FEE.	ACCEPTED RECOMMENDATION THAT IN FSP: 1) FAMILIES BE ENCOURAGED TO COOPERATE WITH CHILD SUPPORT. 2) OPPOSE LEGISLATION TO REQUIRE COOPERATION WITH CHILD SUPPORT. 3) DISREGARD \$50.	LAW	n/a	n/a	

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26. ELIGIBILITY: POTENTIAL SOURCES OF INCOME	AGENCY MUST ESTABLISH AND CARRY OUT POLICIES WITH REFERENCE TO APPLICANTS' AND RECIPIENTS' POTENTIAL SOURCES OF INCOME THAT CAN BE DEVELOPED TO A STATE OF AVAILABILITY.	THERE IS NO REQUIREMENT THAT APPLICANTS OR RECIPIENTS APPLY FOR OTHER ASSISTANCE AS A CONDITON OF ELIGIBILITY.	REVISED POSITION PAPER RECOMMENDED LEGISLATIVE CHANGE TO FOOD STAMP ACT TO ENCOURAGE, BUT NOT REQUIRE, APPLICANTS TO APPLY FOR OTHER POTENTIAL SOURCES OF INCOME. NO CONSENSUS WAS REACHED ON THIS ISSUE.	CONSENSUS NOT REACHED.		n/a	n/a	DROPPED.
27. ELIGIBILITY: RESIDENCY REQUIREMENT	ASSISTANCE UNIT MUST RESIDE IN THE STATE, BUT THERE IS NO DURATIONAL REQUIREMENT.	HOUSEHOLD MUST RESIDE IN THE PROJECT AREA IN WHICH IT APPLIES, BUT THERE IS NO DURATIONAL REQUIREMENT.	FS ACT IS FLEXIBLE ENOUGH TO ALLOW STATES TO CONFORM FOOD STAMP POLICY TO AFDC POLICY WITHOUT A REGULATORY CHANGE. CURRENT REGULATIONS SHOULD REMAIN IN PLACE SO AS NOT TO PENALIZE STATES THAT DO NOT HAVE SYSTEMS NEEDED TO IMPLEMENT POLICY.	ACCEPTED RECOMMENDATION.	REG	a	n/a	OPTION FOR STATE RESIDENCY IN PROPOSED FSP SIMPLIFICATION RULE.
28. ELIGIBILITY: SOCIAL SECURITY NUMBERS	APPLICANT MUST PROVIDE SSN OR APPLY FOR ONE.	APPLICANT MUST PROVIDE NUMBER OR APPLY FOR ONE, BUT GOOD CAUSE ALLOWED FOR FAILURE TO APPLY.	CHANGE AFDC REGULATIONS TO INCLUDE FSP GOOD CAUSE CRITERIA.	LEAVE EACH PROGRAM AS IS.		n/a	n/a	DROPPED.

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29. ELIGIBILITY: STRIKER DEFINITION	FAMILY INELIGIBLE IF ANY CARETAKER RELATIVE IS PARTICIPATING IN A STRIKE ON THE LAST DAY OF THE MONTH. INDIVIDUAL'S NEEDS NOT INCLUDED IF INDIVIDUAL IS ON STRIKER LAST DAY OF THE MONTH.	HOUSEHOLD IS INELIGIBLE IF ANY MEMBER IS ON STRIKE UNLESS THE HOUSEHOLD WAS ELIGIBLE PRIOR TO THE STRIKE OR THE STRIKING MEMBER WAS EXEMPT FROM WORK REGISTRATION THE DAY PRIOR TO THE STRIKE.	ELIMINATE STRIKER PROVISIONS. STRIKER ELIGIBILITY WOULD BE DETERMINED ON SAME BASIS AS THAT OF OTHER APPLICANTS AND RECIPIENTS.	ACCEPTED RECOMMENDATION. ISSUE WILL BECOME LOW PRIORITY IF COST IS HIGH.	LAW	\$56	a	
30. ELIGIBILITY: STUDENTS	NO RESTRICTIONS ON STUDENT ELIGIBILITY IN ADDITION TO THOSE FOR OTHER INDIVIDUALS.	STUDENTS MUST MEET SPECIFIC ELIGIBILITY CRITERIA IN ADDITION TO THOSE WHICH APPLY TO OTHER INDIVIDUALS.	WAIVE STUDENT ELIGIBILITY DETERMINATION FOR RECIPIENTS OF A STATE'S GA PROGRAM BENEFITS AND RECIPIENTS OF FINANCIAL EDUCATION ASSISTANCE BASED ON NEED, REGARDLESS OF SOURCE.	ACCEPTED RECOMMENDATION.	LAW	\$67	n/a	
31. INCOME: COMPLEMENTARY PROGRAMS	PERMITS STATES TO DISREGARD THE VALUE OF ASSISTANCE PAYMENTS THAT ARE COMPLEMENTARY AND NOT DUPLICATIVE.	WITH SPECIFIED EXCEPTIONS, GENERALLY COUNTS STATE-FUNDED ASSISTANCE WHETHER PAID DIRECTLY OR VENDOR.	AMEND FOOD STAMP ACT TO ALLOW A STATE THAT EXEMPTS FUNDS FROM A COMPLEMENTARY PROGRAM IN AFDC TO ALSO EXEMPT INCOME FROM THAT PROGRAM FOR FOOD STAMPS.	ACCEPTED RECOMMENDATION.	LAW	b	n/a	

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29. ELIGIBILITY: STRIKER DEFINITION	FAMILY INELIGIBLE IF ANY CARETAKER RELATIVE IS PARTICIPATING IN A STRIKE ON THE LAST DAY OF THE MONTH. INDIVIDUAL'S NEEDS NOT INCLUDED IF INDIVIDUAL IS ON STRIKER LAST DAY OF THE MONTH.	HOUSEHOLD IS INELIGIBLE IF ANY MEMBER IS ON STRIKE UNLESS THE HOUSEHOLD WAS ELIGIBLE PRIOR TO THE STRIKE OR THE STRIKING MEMBER WAS EXEMPT FROM WORK REGISTRATION THE DAY PRIOR TO THE STRIKE.	ELIMINATE STRIKER PROVISIONS. STRIKER ELIGIBILITY WOULD BE DETERMINED ON SAME BASIS AS THAT OF OTHER APPLICANTS AND RECIPIENTS.	ACCEPTED RECOMMENDATION. ISSUE WILL BECOME LOW PRIORITY IF COST IS HIGH.	LAW	\$56	a	
30. ELIGIBILITY: STUDENTS	NO RESTRICTIONS ON STUDENT ELIGIBILITY IN ADDITION TO THOSE FOR OTHER INDIVIDUALS.	STUDENTS MUST MEET SPECIFIC ELIGIBILITY CRITERIA IN ADDITION TO THOSE WHICH APPLY TO OTHER INDIVIDUALS.	WAIVE STUDENT ELIGIBILITY DETERMINATION FOR RECIPIENTS OF A STATE'S GA PROGRAM BENEFITS AND RECIPIENTS OF FINANCIAL EDUCATION ASSISTANCE BASED ON NEED, REGARDLESS OF SOURCE.	ACCEPTED RECOMMENDATION.	LAW	\$67	n/a	
31. INCOME: COMPLEMENTARY PROGRAMS	PERMITS STATES TO DISREGARD THE VALUE OF ASSISTANCE PAYMENTS THAT ARE COMPLEMENTARY AND NOT DUPLICATIVE.	WITH SPECIFIED EXCEPTIONS, GENERALLY COUNTS STATE-FUNDED ASSISTANCE WHETHER PAID DIRECTLY OR VENDORED.	AMEND FOOD STAMP ACT TO ALLOW A STATE THAT EXEMPTS FUNDS FROM A COMPLEMENTARY PROGRAM IN AFDC TO ALSO EXEMPT INCOME FROM THAT PROGRAM FOR FOOD STAMPS.	ACCEPTED RECOMMENDATION.	LAW	b	n/a	

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ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	STATUS FOLLOWING MARCH APWA MEETING
32. INCOME: EARNINGS OF 18-YEAR-OLD HIGH SCHOOL STUDENTS	DISREGARDS EARNINGS OF DEPENDENT CHILD RECIPIENT WHO IS FULL OR PART-TIME STUDENT FOR NEEDS AND BENEFIT DETERMINATION. STATE OPTION TO DISREGARD EARNINGS OF FULL-TIME STUDENT APPLICANT OR RECIPIENT FOR NEEDS AND ELIGIBILITY FOR UP TO 6 MONTHS.	COUNTS AS EARNED INCOME.	EXCLUDE INCOME OF 18 YEAR-OLD HIGH SCHOOL STUDENTS UNTIL THEY REACH 19 AS LONG AS THEY MEET THE DEFINITION OF A CHILD FOR A PARTICULAR STATE'S AFDC PROGRAM.	ACCEPTED RECOMMENDATION.	LAW	\$8	n/a	IN LELAND BILL.
33. INCOME: EARNINGS OF STUDENTS UNDER 18	DISREGARDS EARNINGS OF DEPENDENT CHILD RECIPIENT WHO IS FULL-TIME OR PART-TIME STUDENT FOR NEEDS AND BENEFIT DETERMINATION. STATE OPTION TO DISREGARD EARNINGS OF FULL-TIME STUDENT APPLICANT OR RECIPIENT FOR NEEDS AND ELIGIBILITY FOR UP TO 6 MONTHS.	EXCLUDES IF STUDENT IS IN SCHOOL AT LEAST HALF TIME AND IS UNDER PARENTAL CONTROL.	EXCLUDE EARNINGS OF FULL OR PART-TIME STUDENTS UNDER 18 FOR BOTH ELIGIBILITY AND BENEFIT DETERMINATIONS FOR BOTH PROGRAMS.	ACCEPTED RECOMMENDATION.	LAW	a	a	

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34. INCOME: ENERGY ASSISTANCE	EXCLUDES ASSISTANCE PROVIDED UNDER LOW-INCOME HOME ENERGY ASSISTANCE ACT. STATES HAVE OPTION TO EXCLUDE ASSISTANCE FROM OTHER SPECIFIED TYPES OF PROVIDERS.	EXCLUDES CASH OR IN-KIND ENERGY ASSISTANCE UNDER FEDERAL LAW AND WITH FNS APPROVAL FROM SOME STATE AND LOCAL PROGRAMS, INCLUDING ASSISTANCE COMBINED WITH PUBLIC OR GENERAL ASSISTANCE PROGRAMS.	DISREGARD FOR BOTH PROGRAMS ANY ENERGY PAYMENT BASED ON FINANCIAL NEED. ENERGY ASSISTANCE IS DEFINED AS ANY ASSISTANCE PAID TO OR ON BEHALF OF A HOUSEHOLD TO COVER THE PAYMENT FOR FUEL TO HEAT OR COOL RESIDENCE, WHICH IS BASED ON FINANCIAL NEED.	ACCEPTED RECOMMENDATION.	LAW	b	b	
35. INCOME: HUD UTILITY PAYMENTS	STATES HAVE OPTION TO COUNT OR DISREGARD RENT OR HOUSING SUBSIDIES AS INCOME, BUT MAY COUNT ONLY THE AMOUNT THAT EXCEEDS THE SHELTER AMOUNT ESTABLISHED IN THE PAYMENT STANDARD FOR AN ASSISTANCE UNIT OF THE SAME SIZE AND COMPOSITION.	VENDOR PAYMENTS TO LANDLORD EXCLUDED. DIRECT PAYMENTS TO HOUSEHOLD AND VENDOR PAYMENTS TO UTILITY PROVIDER COUNTED. AMOUNT HOUSEHOLD OWES LANDLORD AFTER HUD PAYMENTS IS ALLOWED AS RENT EXPENSE. IN 3RD CIRCUIT, HUD UTILITY PAYMENTS EXCLUDED.	EXCLUDE FROM INCOME FOR BOTH PROGRAMS. TREAT AS ISSUE SEPARATE FROM ENERGY ASSISTANCE.	ACCEPTED RECOMMENDATION.	LAW	\$160	n/a	

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34. INCOME: ENERGY ASSISTANCE	EXCLUDES ASSISTANCE PROVIDED UNDER LOW-INCOME HOME ENERGY ASSISTANCE ACT. STATES HAVE OPTION TO EXCLUDE ASSISTANCE FROM OTHER SPECIFIED TYPES OF PROVIDERS.	EXCLUDES CASH OR IN-KIND ENERGY ASSISTANCE UNDER FEDERAL LAW AND WITH FNS APPROVAL FROM SOME STATE AND LOCAL PROGRAMS, INCLUDING ASSISTANCE COMBINED WITH PUBLIC OR GENERAL ASSISTANCE PROGRAMS.	DISREGARD FOR BOTH PROGRAMS ANY ENERGY PAYMENT BASED ON FINANCIAL NEED. ENERGY ASSISTANCE IS DEFINED AS ANY ASSISTANCE PAID TO OR ON BEHALF OF A HOUSEHOLD TO COVER THE PAYMENT FOR FUEL TO HEAT OR COOL RESIDENCE, WHICH IS BASED ON FINANCIAL NEED.	ACCEPTED RECOMMENDATION.	LAW	b	b	
35. INCOME: HUD UTILITY PAYMENTS	STATES HAVE OPTION TO COUNT OR DISREGARD RENT OR HOUSING SUBSIDIES AS INCOME, BUT MAY COUNT ONLY THE AMOUNT THAT EXCEEDS THE SHELTER AMOUNT ESTABLISHED IN THE PAYMENT STANDARD FOR AN ASSISTANCE UNIT OF THE SAME SIZE AND COMPOSITION.	VENDOR PAYMENTS TO LANDLORD EXCLUDED. DIRECT PAYMENTS TO HOUSEHOLD AND VENDOR PAYMENTS TO UTILITY PROVIDER COUNTED. AMOUNT HOUSEHOLD OWES LANDLORD AFTER HUD PAYMENTS IS ALLOWED AS RENT EXPENSE. IN 3RD CIRCUIT, HUD UTILITY PAYMENTS EXCLUDED.	EXCLUDE FROM INCOME FOR BOTH PROGRAMS. TREAT AS ISSUE SEPARATE FROM ENERGY ASSISTANCE.	ACCEPTED RECOMMENDATION.	LAW	\$160	n/a	

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36. INCOME: IN-KIND INCOME/VENDOR PAYMENTS	EARNED IN-KIND INCOME COUNTED AS INCOME. STATE OPTION TO DISREGARD SUPPORT AND MAINTENANCE IN-KIND ASSISTANCE FURNISHED BY PRIVATE NON-PROFIT AGENCY OR SPECIFIED HOME ENERGY PROVIDERS. STATE OPTION TO COUNT OR DISREGARD UNEARNED IN-KIND INCOME.	EXCLUDES IN-KIND INCOME. UNLESS SPECIFICALLY EXCLUDED, THIRD-PARTY PAYMENTS ARE COUNTED AS INCOME IF FUNDS ARE LEGALLY OBLIGATED TO BE PAID TO THE HOUSEHOLD.	EXCLUDE IN-KIND BENEFITS AS INCOME FOR BOTH PROGRAMS. ADOPT FSP VENDOR PAYMENT POLICY FOR AFDC.	ACCEPTED RECOMMENDATIONS.	LAW	\$-3 c	\$9	
37. INCOME: INCOME EXCLUDED BY OTHER LAWS	EXCLUSIONS FOR EDUCATION ASSISTANCE, INDIAN PER CAPITA PAYMENTS, JTPA, AND OTHERS REQUIRED BY LAW DIFFER FROM FOOD STAMP EXCLUSIONS.	EXCLUSIONS FOR EDUCATION ASSISTANCE, INDIAN PER CAPITA PAYMENTS, JTPA, AND OTHERS REQUIRED BY LAW DIFFER FROM THE AFDC EXCLUSIONS.	AMEND SOCIAL SECURITY ACT AND FOOD STAMP ACT TO MAKE LISTS OF EXCLUDED INCOME IDENTICAL. AMEND BOTH LAWS TO ALLOW THE SECRETARIES OF AGRICULTURE AND DHHS TO ISSUE REGULATIONS AT ANY TIME ANOTHER LAW MAKES INCOME FROM A PROGRAM EXEMPT FOR AFDC OR FSP.	ACCEPTED RECOMMENDATION.	LAW	b	b	

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38. INCOME: INCOME OF TREATMENT OF THE INCOME INELIGIBLE (DISQUALIFIED) MEMBERS WITH THE UNIT BUT NOT PARTICIPATING DEPENDS ON THE REASON FOR NONPARTICIPATION. EXCEPT FOR INDIVIDUALS DISQUALIFIED FOR SPECIFIED REASONS, STATES HAVE OPTION TO ALLOCATE INCOME OF NONPARTICIPATING MEMBERS.	OF AN INDIVIDUAL LIVING WITH THE UNIT BUT NOT PARTICIPATING DEPENDS ON THE REASON FOR NONPARTICIPATION. EXCEPT FOR INDIVIDUALS DISQUALIFIED FOR SPECIFIED REASONS, STATES HAVE OPTION TO ALLOCATE INCOME OF NONPARTICIPATING MEMBERS.	TREATMENT OF INCOME OF INELIGIBLE MEMBER DEPENDS ON THE REASON FOR INELIGIBILITY.	GIVE THIS DIFFERENCE LOW PRIORITY OR DROP IT UNTIL COORDINATION IS ACHIEVED IN THE REASONS FOR DISQUALIFICATION FROM PROGRAM PARTICIPATION.	ACCEPTED RECOMMENDATION. DROP AS INCOME ISSUE.		n/a	n/a	
39. INCOME: IRREGULAR INCOME	STATE OPTION TO DISREGARD SMALL NONRECURRING GIFTS NOT TO EXCEED \$30 PER INDIVIDUAL IN A QUARTER.	FOR PROSPECTIVE BUDGETING, IRREGULAR INCOME NOT TO EXCEED \$30 IN A QUARTER DISREGARDED. IRREGULAR INCOME COUNTED IN RETROSPECTIVE BUDGETING.	REVISE FOOD STAMP ACT TO DISREGARD UP TO \$30 PER PERSON PER QUARTER OF GIFTS AND INCONSEQUENTIAL INCOME IN EITHER PROSPECTIVE OR RETROSPECTIVE BUDGETING.	ACCEPTED RECOMMENDATION.	LAW	a	n/a	

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INCOME: INCOME OF TREATMENT OF THE INCOME INELIGIBLE (DISQUALIFIED) MEMBERS WITH THE UNIT BUT NOT PARTICIPATING DEPENDS ON THE REASON FOR NONPARTICIPATION. EXCEPT FOR INDIVIDUALS DISQUALIFIED FOR SPECIFIED REASONS, STATES HAVE OPTION TO ALLOCATE INCOME OF NONPARTICIPATING MEMBERS.	OF AN INDIVIDUAL LIVING WITH THE UNIT BUT NOT PARTICIPATING DEPENDS ON THE REASON FOR NONPARTICIPATION. EXCEPT FOR INDIVIDUALS DISQUALIFIED FOR SPECIFIED REASONS, STATES HAVE OPTION TO ALLOCATE INCOME OF NONPARTICIPATING MEMBERS.	TREATMENT OF INCOME OF INELIGIBLE MEMBER DEPENDS ON THE REASON FOR INELIGIBILITY.	GIVE THIS DIFFERENCE LOW PRIORITY OR DROP IT UNTIL COORDINATION IS ACHIEVED IN THE REASONS FOR DISQUALIFICATION FROM PROGRAM PARTICIPATION.	ACCEPTED RECOMMENDATION. DROP AS INCOME ISSUE.		n/a	n/a	
39. INCOME: IRREGULAR STATE OPTION TO DISREGARD SMALL NONRECURRING GIFTS NOT TO EXCEED \$30 PER INDIVIDUAL IN A QUARTER.	IRREGULAR STATE OPTION TO DISREGARD SMALL NONRECURRING GIFTS NOT TO EXCEED \$30 PER INDIVIDUAL IN A QUARTER.	FOR PROSPECTIVE BUDGETING, IRREGULAR INCOME NOT TO EXCEED \$30 IN A QUARTER DISREGARDED. IRREGULAR INCOME COUNTED IN RETROSPECTIVE BUDGETING.	REVISE FOOD STAMP ACT TO DISREGARD UP TO \$30 PER PERSON PER QUARTER OF GIFTS AND INCONSEQUENTIAL INCOME IN EITHER PROSPECTIVE OR RETROSPECTIVE BUDGETING.	ACCEPTED RECOMMENDATION.	LAW	a	n/a	

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40. INCOME: JTPA EARNINGS FROM STATE TRAINING PROGRAMS	AT STATE OPTION, MAY DISREGARD UNEARNED INCOME INDEFINITELY AND EARNED INCOME FOR 6 MONTHS OF A DEPENDENT CHILD PARTICIPATING IN JTPA.	EXCLUDES ALL JTPA INCOME EXCEPT THAT FROM ON-THE-JOB TRAINING PROGRAMS UNDER SECTION 204(5) OF TITLE II, JTPA. ALL OJT INCOME OF INDIVIDUALS UNDER 19 UNDER PARENTAL CONTROL EXCLUDED.	AMEND AFDC PROGRAM TO BE CONSISTENT WITH FSP AND EXCLUDE JTPA STATE TRAINING PROGRAM INCOME OF HOUSEHOLD MEMBERS UNDER 19.	ACCEPTED RECOMMENDATION.	LAW	n/a	a	
41. INCOME: LUMP SUM PAYMENTS	IF UNIT'S INCOME AFTER DISREGARDS EXCEEDS NEEDS STANDARD BECAUSE OF RECEIPT OF NONRECURRING EARNED OR UNEARNED LUMP SUM INCOME, UNIT IS INELIGIBLE FOR PERIOD DETERMINED BY DIVIDING LUMP SUM AMOUNT PLUS OTHER HOUSEHOLD INCOME BY NEEDS STANDARD.	ACT EXCLUDES FROM INCOME NONRECURRING LUMP-SUM PAYMENTS INCLUDING BUT NOT LIMITED TO INCOME TAX REFUNDS, REBATES OR CREDITS, RETROACTIVE LUMP-SUM SOCIAL SECURITY OR RAILROAD RETIREMENT PENSION PAYMENTS AND INSURANCE SETTLEMENTS.	AMEND SOCIAL SECURITY ACT TO ADOPT FSP POLICY. ADD PROVISIONS TO RULES OF BOTH PROGRAMS TO REQUIRE VERIFICATION OF THE DISPOSITION OF LUMP PAYMENTS IN EXCESS OF THE RESOURCE ELIGIBILITY MAXIMUMS.	ACCEPTED RECOMMENDATION.	LAW	\$-2 c	\$6	

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42. INCOME: SELF-EMPLOYMENT - CALCULATING BOARDER INCOME	ALLOWS USE OF A FLAT PERCENTAGE FOR EXPENSES IN CALCULATING INCOME FROM BOARDERS.	THE COST OF PRODUCING SELF-EMPLOYMENT BOARDER INCOME (OTHER THAN COMMERCIAL BOARDING HOUSES) IS THE GREATER OF THE MAXIMUM ALLOTMENT AMOUNT FOR THE BOARDER'S HOUSEHOLD SIZE OR THE ACTUAL COST OF PROVIDING ROOM AND BOARD.	AMEND AFDC PROGRAM TO CONFORM WITH FSP RULES AND ALLOW EITHER MAXIMUM ALLOTMENT FOR HOUSEHOLD OF THE SAME SIZE AS NUMBER OF BOARDERS OR THE ACTUAL DOCUMENTED COST, IF HIGHER THAN THE ALLOTMENT.	ACCEPTED RECOMMENDATION.	REG	n/a	a	WAIVER POSSIBLE FOR AFDC AND FSP. FSP SIMPLIFICATION RULE INCLUDES OPTION FOR PERCENTAGE FOR CHILD CARE PROVIDERS AND HOUSEHOLDS WITH BOARDERS.
43. INCOME: SELF-EMPLOYMENT EXPENSES	EXPENSES LIMITED TO THOSE WITHOUT WHICH GOODS OR SERVICES COULD NOT BE PRODUCED. DEPRECIATION, PURCHASES OF CAPITAL EQUIPMENT, PAYMENTS ON PRINCIPAL OF LOANS FOR CAPITAL ASSETS OR DURABLE GOODS, PERSONAL BUSINESS, TRANS., ENTERTAINMENT NOT ALLOWED.	EXPENSES NOT ALLOWED ARE: NET LOSSES FROM PRIOR PERIODS, DEPRECIATION, RETIREMENT MONEY, PURCHASE PRICE OR PAYMENTS ON PRINCIPAL OF LOANS FOR EQUIPMENT, PERSONAL INCOME TAXES AND OTHER WORK-RELATED EXPENSES COVERED BY EARNED INCOME DEDUCTION.	BOTH PROGRAMS SHOULD MODIFY REGULATIONS TO ALLOW SAME EXPENSES AND RECONSIDER TREATMENT OF DEPRECIATION. AMEND LAWS TO ALLOW STATES TO DEVELOP PERCENTAGE STANDARDS TO COVER THE COSTS OF DOING BUSINESS.	ACCEPTED RECOMMENDATION. NEED COMMON DEFINITIONS OF EXPENSES. WANT TO USE PERCENT, BUT NEED MORE INFORMATION TO DETERMINE WHAT THE PERCENT SHOULD BE.	REG	a	a	

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42. INCOME: SELF-EMPLOYMENT - CALCULATING BOARDER INCOME	ALLOWS USE OF A FLAT PERCENTAGE FOR EXPENSES IN CALCULATING INCOME FROM BOARDERS.	THE COST OF PRODUCING SELF-EMPLOYMENT BOARDER INCOME (OTHER THAN COMMERCIAL BOARDING HOUSES) IS THE GREATER OF THE MAXIMUM ALLOTMENT AMOUNT FOR THE BOARDER'S HOUSEHOLD SIZE OR THE ACTUAL COST OF PROVIDING ROOM AND BOARD.	AMEND AFDC PROGRAM TO CONFORM WITH FSP RULES AND ALLOW EITHER MAXIMUM ALLOTMENT FOR HOUSEHOLD OF THE SAME SIZE AS NUMBER OF BOARDERS OR THE ACTUAL DOCUMENTED COST, IF HIGHER THAN THE ALLOTMENT.	ACCEPTED RECOMMENDATION.	REG	n/a	a	WAIVER POSSIBLE FOR AFDC AND FSP. FSP SIMPLIFICATI RULE INCLUDES OPTION FOR PERCENTAGE FOR CHILD CARE PROVIDERS AND HOUSEHOLDS WITH BOARDERS.
43. INCOME: SELF-EMPLOYMENT EXPENSES	EXPENSES LIMITED TO THOSE WITHOUT WHICH GOODS OR SERVICES COULD NOT BE PRODUCED. DEPRECIATION, PURCHASES OF CAPITAL EQUIPMENT, PAYMENTS ON PRINCIPAL OF LOANS FOR CAPITAL ASSETS OR DURABLE GOODS, PERSONAL BUSINESS, OTHER WORK-RELATED TRANS., ENTERTAINMENT NOT ALLOWED.	EXPENSES NOT ALLOWED ARE: NET LOSSES FROM PRIOR PERIODS, DEPRECIATION, RETIREMENT MONEY, PURCHASE PRICE OR PAYMENTS ON PRINCIPAL OF LOANS FOR EQUIPMENT, PERSONAL INCOME TAXES AND OTHER WORK-RELATED EXPENSES COVERED BY EARNED INCOME DEDUCTION.	BOTH PROGRAMS SHOULD MODIFY REGULATIONS TO ALLOW SAME EXPENSES AND RECONSIDER TREATMENT OF DEPRECIATION. AMEND LAWS TO ALLOW STATES TO DEVELOP PERCENTAGE STANDARDS TO COVER THE COSTS OF DOING BUSINESS.	ACCEPTED RECOMMENDATION. NEED COMMON DEFINITIONS OF EXPENSES. WANT TO USE PERCENT, BUT NEED MORE INFORMATION TO DETERMINE WHAT THE PERCENT SHOULD BE.	REG	a	a	

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44. INCOME: STUDENT ASSISTANCE	EXCLUDES LOANS AND GRANTS OBTAINED AND USED UNDER CONDITIONS THAT PRECLUDE USE FOR CURRENT LIVING COSTS. EXCLUDES AID TO UNDERGRADUATES FROM EDUCATION DEPT. EXCLUDES COSTS OF ATTENDANCE FROM TITLE IV, BIA. STATE OPTION TO DISREGARD ALL STUDENT AID.	EXCLUDES AMOUNTS EARMARKED OR USED FOR COSTS OF ATTENDANCE, BUT COUNTS AS INCOME AMOUNTS MADE AVAILABLE FOR NORMAL LIVING COSTS.	LONG-TERM GOAL IS TO AMEND THE FOOD STAMP ACT TO TOTALLY DISREGARD ALL EDUCATIONAL ASSISTANCE. SHORT-TERM GOAL IS FOR FNS TO ALLOW STATES TO SEND A FORM TO SCHOOLS ASKING WHAT PORTION OF ASSISTANCE IS MADE AVAILABLE FOR ROOM AND BOARD.	ACCEPTED RECOMMENDATION.	LAW	\$5	n/a	
45. INCOME: TITLE IV-D \$50 CHILD SUPPORT PASS-THROUGH PAYMENTS	DISREGARDS THE PASS-THROUGH PAYMENTS.	COUNTS PAYMENTS AS INCOME. STATES HAVE OPTION TO DISREGARD, BUT MUST PAY FNS FOR THE RESULTING ADDITIONAL BENEFITS ISSUED.	AMEND FOOD STAMP ACT TO DISREGARD THE \$50 PAYMENTS.	ACCEPTED RECOMMENDATION.	LAW	\$181	n/a	IN LELAND BILL.
46. RECERTIFICATION (REDETERMINATION): CERTIFICATION PERIODS	REDETERMINES ELIGIBILITY WHEN NECESSARY BUT AT LEAST ONCE EVERY 6 MONTHS UNLESS UNIT REPORTS MONTHLY OR IS COVERED BY APPROVED ERROR-PRONE PROFILING SYSTEM. MUST HAVE FACE-TO-FACE REDETERMINATION ONCE IN 12 MONTHS.	CERTIFICATION PERIODS OF FROM ONE TO TWELVE MONTHS ARE ASSIGNED TO NONMONTHLY REPORTING HOUSEHOLDS, DEPENDING ON HOUSEHOLD CHARACTERISTICS. MONTHLY REPORTING HOUSEHOLDS MUST BE CERTIFIED FOR SIX OR TWELVE MONTHS.	ALLOW OPEN-ENDED AUTHORIZATION OF BENEFITS FOR ALL HOUSEHOLDS. AT A MINIMUM, ALL CASES MUST BE REVIEWED EVERY 24 MONTHS.	ACCEPTED RECOMMENDATION.	LAW	b	b	

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47. RECERTIFICATION (REDETERMINATION): PROCESS	STATES MAY PRESCRIBE FORMS AND PROCEDURES.	LAW AND REGULATIONS CONTAIN SPECIFIC PROCEDURAL REQUIREMENTS FOR NOTICE OF EXPIRATION AND REAPPLICATION.	ALLOW STATE AGENCIES TO SET OWN REVIEW SCHEDULES.	ACCEPTED RECOMMENDATION.	LAW	a	a	FSP PROPOSED SIMPLIFICATION RULE WILL INCLUDE PROVISIONS ON RECERTIFICATION.
48. RESOURCES: ACCESSIBILITY	RESOURCES ARE CONSIDERED AVAILABLE WHEN ACTUALLY AVAILABLE AND WHEN THE CLIENT HAS A LEGAL INTEREST IN A LIQUIDATED SUM AND HAS THE LEGAL ABILITY TO MAKE IT AVAILABLE.	REGS EXCLUDE INACCESSIBLE RESOURCES SUCH AS THOSE IN IRREVOCABLE TRUSTS, PROBATE, SECURITY DEPOSITS, REAL PROPERTY BEING SOLD, JOINTLY HELD RESOURCES THAT CANNOT PRACTICALLY BE SUBDIVIDED AND THE OTHER OWNER REFUSES TO SELL.	COUNT THE VALUE OF PROPERTY SOLELY OWNED BY THE HOUSEHOLD/ASSISTANCE UNIT FOR BOTH PROGRAMS. EXCLUDE HEIR OR JOINTLY OWNED PROPERTY (OTHER THAN IF OWNED BY PERSONS IN THE BUDGET UNIT).	ACCEPTED RECOMMENDATION.	REG	a	a	
49. RESOURCES: PLANS	BURIAL EXCLUDES ONE BONA FIDE FUNERAL AGREEMENT PER INDIVIDUAL UP TO \$1,500 IN EQUITY VALUE OR LOWER AMOUNT AT STATE OPTION AND EXCLUDES ONE BURIAL PLOT PER INDIVIDUAL.	INACCESSIBLE FUNDS IN BURIAL AGREEMENTS AND ONE BURIAL PLOT PER MEMBER ARE EXCLUDED. ACCESSIBLE FUNDS ARE COUNTED.	EXCLUDE FOR BOTH PROGRAMS.	ACCEPTED RECOMMENDATION.	REG	a	a	PROVISION ON BURIAL PLANS IN FSP SIMPLIFICATION RULE.

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47. RECERTIFICATION (REDETERMINATION): PROCESS	STATES MAY PRESCRIBE FORMS AND PROCEDURES.	LAW AND REGULATIONS CONTAIN SPECIFIC PROCEDURAL REQUIREMENTS FOR NOTICE OF EXPIRATION AND REAPPLICATION.	ALLOW STATE AGENCIES TO SET OWN REVIEW SCHEDULES.	ACCEPTED RECOMMENDATION.	LAW	a	a	FSP PROPOSED SIMPLIFICATION RULE WILL INCLUDE PROVISIONS ON RECERTIFICATION.
48. RESOURCES: ACCESSIBILITY	RESOURCES ARE CONSIDERED AVAILABLE WHEN ACTUALLY AVAILABLE AND WHEN THE CLIENT HAS A LEGAL INTEREST IN A LIQUIDATED SUM AND HAS THE LEGAL ABILITY TO MAKE IT AVAILABLE.	REGS EXCLUDE INACCESSIBLE RESOURCES SUCH AS THOSE IN IRREVOCABLE TRUSTS, PROBATE, SECURITY DEPOSITS, REAL PROPERTY BEING SOLD, JOINTLY HELD RESOURCES THAT CANNOT PRACTICALLY BE SUBDIVIDED AND THE OTHER OWNER REFUSES TO SELL.	COUNT THE VALUE OF PROPERTY SOLELY OWNED BY THE HOUSEHOLD/ASSISTANCE UNIT FOR BOTH PROGRAMS. EXCLUDE MEIR OR JOINTLY OWNED PROPERTY (OTHER THAN IF OWNED BY PERSONS IN THE BUDGET UNIT).	ACCEPTED RECOMMENDATION.	REG	a	a	
49. RESOURCES: BURIAL PLANS	EXCLUDES ONE BONA FIDE FUNERAL AGREEMENT PER INDIVIDUAL UP TO \$1,500 IN EQUITY VALUE OR LOWER AMOUNT AT STATE OPTION AND EXCLUDES ONE BURIAL PLOT PER INDIVIDUAL.	INACCESSIBLE FUNDS IN BURIAL AGREEMENTS AND ONE BURIAL PLOT PER MEMBER ARE EXCLUDED. ACCESSIBLE FUNDS ARE COUNTED.	EXCLUDE FOR BOTH PROGRAMS.	ACCEPTED RECOMMENDATION.	REG	a	a	PROVISION ON BURIAL PLANS IN FSP SIMPLIFICATION RULE.

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50. RESOURCES: INCOME-PRODUCING REAL PROPERTY	COUNTS AS A RESOURCE EXCEPT UNDER PROVISIONS GOVERNING REAL PROPERTY FOR SALE.	EXCLUDES AS A RESOURCE IF PRODUCING INCOME CONSISTENT WITH ITS FAIR MARKET VALUE OR ESSENTIAL TO SELF-EMPLOYMENT, BUT COUNTS INCOME PRODUCED.	EXCLUDE FOR BOTH PROGRAMS INCOME-PRODUCING PROPERTY ESSENTIAL TO EMPLOYMENT OR SELF-EMPLOYMENT. EXCLUDE FOR BOTH PROGRAMS THE EQUITY VALUE OF REAL PROPERTY (SOLE AND CLEAR OWNERSHIP) WHICH IS PRODUCING INCOME CONSISTENT WITH ITS FAIR MARKET VALUE.	ACCEPTED RECOMMENDATION.	LAW	n/a	a	
51. RESOURCES: LIFE INSURANCE	COUNTS AS A RESOURCE.	EXCLUDES AS A RESOURCE.	EXCLUDE FOR BOTH PROGRAMS.	ACCEPTED RECOMMENDATION.	LAW	n/a	a	
52. RESOURCES: REAL PROPERTY FOR SALE	RESOURCE AFTER 6 MONTHS (OR 9 AT STATE OPTION) IF NOT SOLD. CLIENT MUST AGREE TO MAKE A GOOD FAITH EFFORT TO DISPOSE OF PROPERTY AND REPAY AFDC RECEIVED DURING SALE PERIOD. IF NOT SOLD DURING PERIOD, AFDC ENDS. OVERPAYMENT CALCULATED WHEN PROPERTY SOLD.	EXCLUDES FOR UNSPECIFIED TIME IF HOUSEHOLD MAKING GOOD FAITH EFFORT TO SELL.	EXCLUDE FOR BOTH PROGRAMS REAL PROPERTY THE UNIT IS MAKING A GOOD FAITH EFFORT TO SELL.	ACCEPTED RECOMMENDATION.	LAW	n/a	a	

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ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	STATUS FOLLOWING MARCH APWA MEETING
53. RESOURCES: RESOURCE LIMIT	\$1,000 PER ASSISTANCE UNIT USING EQUITY VALUE OF RESOURCES.	\$2,000 PER HOUSEHOLD OR \$3,000 IF ONE MEMBER IS 60 OR OVER, USING EQUITY VALUE EXCEPT FOR VEHICLES. LIMIT DOES NOT APPLY TO CATEGORICALLY ELIGIBLE HOUSEHOLDS OR TO HOUSEHOLD MEMBERS WHO RECEIVE AFDC.	USE FOOD STAMP RESOURCE LIMITS.	ACCEPTED RECOMMENDATION.	LAW	b	b	
54. RESOURCES: TRANSFER	AFDC REGS CONTAIN NO PROVISION REGARDING INELIGIBILITY BECAUSE OF TRANSFER OF RESOURCES, BUT REGULATIONS ALLOW STATES TO IMPOSE ADDITIONAL CONDITIONS OF ELIGIBILITY. 35 STATES PROHIBIT TRANSFER OR OTHER DISPOSITION OF PROPERTY PRIOR TO APPLICATION.	PROHIBITS PARTICIPATION IN THE PROGRAM FOR UP TO ONE YEAR IF RESOURCE IS TRANSFERRED WITHIN 3 MONTHS PRIOR TO APPLICATION OR DURING CERTIFICATION PERIOD IN ORDER TO MEET FSP RESOURCE LIMITS.	STATES MAY CONFORM AFDC POLICY TO FSP POLICY.	ACCEPTED RECOMMENDATION.		n/a	a	

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54. RESOURCES: TRANSFER	AFDC REGS CONTAIN NO PROVISION REGARDING INELIGIBILITY BECAUSE OF TRANSFER OF RESOURCES, BUT REGULATIONS ALLOW STATES TO IMPOSE ADDITIONAL CONDITIONS OF ELIGIBILITY. 35 STATES PROHIBIT TRANSFER OR OTHER DISPOSITION OF PROPERTY PRIOR TO APPLICATION.	PROHIBITS PARTICIPATION IN THE PROGRAM FOR UP TO ONE YEAR IF RESOURCE IS TRANSFERRED WITHIN 3 MONTHS PRIOR TO APPLICATION OR DURING CERTIFICATION PERIOD IN ORDER TO MEET FSP RESOURCE LIMITS.	STATES MAY CONFORM AFDC POLICY TO FSP POLICY.	ACCEPTED RECOMMENDATION.		n/a	a	

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55. RESOURCES: VEHICLES	EXCLUDES VEHICLES USED AS HOUSEHOLD HOME OR NEEDED TO PRODUCE INCOME. EXCLUDES FIRST \$1,500 OF EQUITY VALUE OF ONE VEHICLE AND COUNTS REMAINDER AS AVAILABLE RESOURCE.	EXCLUDES VEHICLES USED AS HOME, NEEDED TO PRODUCE INCOME OR TO TRANSPORT DISABLED MEMBER. COUNTS MARKET VALUE OVER \$4,500 OF 1 VEHICLE PER HOUSEHOLD AND EDUCATION AND WORK-RELATED VEHICLES. COUNTS GREATER OF FMV OVER \$4,500 OR EQUITY FOR OTHERS.	EXCLUDE ONE VEHICLE PER HOUSEHOLD REGARDLESS OF VALUE. COUNT FOR BOTH PROGRAMS THE EXCESS EQUITY (FAIR MARKET VALUE LESS ENCUMBRANCES) VALUE OF OTHER LICENSED VEHICLES.	ACCEPTED RECOMMENDATION.	LAW	\$991	\$736	FNS TO DETERMINE COSTS OF NEW PROPOSALS. INDEXING OF \$4500 FMV LIMIT IN LELAND BILL.
56. RESTORED BENEFITS (UNDERPAYMENTS): POLICY	UNDERPAYMENTS RESULTING FROM CLIENT OR AGENCY ERRORS ARE CORRECTED TO CURRENT RECIPIENTS AS LONG AS THE REPORTING REQUIREMENT FOR CHANGES IS SATISFIED. STATES MAY CORRECT UNDERPAYMENTS CAUSED BY CLIENT OR AGENCY ERROR TO FORMER RECIPIENTS.	LOST BENEFITS ARE RESTORED ONLY WHEN THE AGENCY MAKES A MISTAKE.	PAY RESTORED BENEFITS WHETHER DUE TO AGENCY OR CLIENT ERROR. CONTINUE TO ALLOW OFFSET OF RESTORED BENEFITS AGAINST OUTSTANDING CLAIMS. OFFSET POTENTIAL RESTORATIONS OLDER THAN ONE YEAR AGAINST OUTSTANDING CLAIMS.	DECIDED THAT BENEFITS SHOULD NOT BE RESTORED FOR CLIENT ERROR.	REG	\$2	\$-6	

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57. RESTORED BENEFITS (UNDERPAYMENTS): TIME LIMIT	NO TIME LIMIT FOR CORRECTION OF UNDERPAYMENTS. BENEFITS ARE RESTORED TO CURRENT RECIPIENTS BEGINNING WITH THE MONTH THAT CHANGES MUST BE REPORTED TO THE STATE AGENCY. CORRECTIVE PAYMENTS TO UNDERPAID FORMER RECIPIENTS ARE PERMITTED BUT NOT REQUIRED.	LOST BENEFITS CANNOT BE RESTORED FOR MORE THAN 12 MONTHS UNLESS THERE IS A SPECIAL EXCEPTION.	MODIFY AFDC LAW TO CONFORM WITH THE FOOD STAMP 12-MONTH LIMIT ON RESTORED BENEFITS, UNLESS REGULATIONS SPECIFY HOUSEHOLD IS ENTITLED TO LOST BENEFITS FOR A LONGER BENEFIT.	ACCEPTED RECOMMENDATION.	LAW	n/a	a	

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simplification

Family Re-Union II: Reinventing Family Policy
Roundtable With Vice President Gore
Sponsored by The Progressive Foundation
Nashville - July 30, 1993
Remarks by Sarah Shuptrine, President
The Southern Institute On Children And Families
Columbia, SC

There is a lot of concern today regarding the need to make government systems more responsive and, as a result, increased pressure is being placed on communities to provide comprehensive services for children and families. We speak about these objectives as if they are entirely within the control of local communities.

The fact is that local efforts to coordinate and integrate services will continue to be severely hampered without major federal reform of the current categorical system of eligibility rules and funding streams. Local ingenuity can go only so far.

An important step toward removal of obstacles to coordinated service delivery would be for the Administration and Congress to establish a mechanism for a joint review of federal rules across the major programs designed to benefit children and families. The task at hand would be: 1) to compile a report on the rules specifying whether the authority is statutory or regulatory; 2) to identify rules which can be eliminated; and 3) to identify rules which can be made uniform across programs. It is essential that representatives from the state and local level be at the table.

A stumbling block to previous efforts at uniformity has been the inability to obtain agreement on uniform income eligibility levels. If you exclude the contentious area of income levels, you can still make significant progress toward untying the hands of public agencies and private providers who want to deliver coordinated, comprehensive services.

For example, the three major poverty related assistance programs -- AFDC, Food Stamps and Medicaid -- are administered through a quagmire of differing rules and regulations unrelated to income eligibility levels such as definitions, disregards and exemptions, quality control sanctions, work and training requirements, allowed resources, how you count income and many other areas. These rules are carried out by three federal agencies within two federal departments. Congressional jurisdiction is handled by three committees in the U.S. House and two committees in the U. S. Senate. The three programs are usually administered by the same agency at the state level, but because of their complexity and different reporting arrangements, they generally operate in an autonomous manner.

Many families need the benefits of all of these programs, yet the differences in federal rules across the programs usually mean that families must file two and sometimes three separate applications, with separate eligibility workers. And the applications are only the beginning. Applicants must provide verification for most of their statements, primarily because of a state's fear of federal fiscal error rate sanctions. The error rate sanctions and verification requirements were put in place in the name of accountability and, once again, they often differ across the three programs. This is very hard on applicants because they often must obtain the verification from a third party who may or may not be cooperative, such as landlords, former employers and estranged spouses. Some public agencies are developing expensive computer programs to deal with the differing rules. The more basic question is why the rules are there in the first place and why they must differ across programs.

What has occurred as a result of the categorical approach and the mandates for accountability has been the erection of eligibility barriers that are often insurmountable for the most needy of our families. Their inability to obtain the basic benefits provided through AFDC, Medicaid and Food Stamps is a serious impediment for local communities attempting to deliver comprehensive services.

The impact is not small. Across the nation in 1991, of all the families who applied for AFDC benefits, 27% were denied. These denials affected over 1.1 million families that year. Sixty percent (60%) of the denials were for procedural reasons, rather than for reasons related to their income or resources.

Likewise, local eligibility agencies attempting to administer the programs are drowning in paperwork related to the verification requirements and the differing rules. For example, AFDC rules state that a family cannot own a car worth more than \$1,500 in equity value. In Food Stamps, the family cannot own a car worth more than \$4,500 market value. In Medicaid, the value can range from \$1,500 equity value to total exemption, depending on which categorical group you are applying under. In Food Stamps, the car can be exempt if it is used for work or training or transporting a disabled person, but in AFDC there is no exemption for the car under any circumstance. The question is: Why can't we talk about the same car in all three programs, or better yet, exempt the car in all three programs? After all, if you are trying to promote self sufficiency and access to preventive services, why impose a resource test on the family car?

Reforming the categorical system will reduce administrative cost and allow local communities to deliver efficient and effective services. And, it will remove eligibility barriers which are keeping many needy families from receiving services and benefits. It's a big problem, a big challenge and a big opportunity.

One mechanism for achieving reform across departmental lines would be through the establishment of a National Council on Children and Families. The overall purpose of the Council would be to promote the general well-being of all children. So as to avoid duplication in cost and effort, existing federal councils and committees should be reviewed to determine if they are still needed.

The Council would include membership from the decision makers at all levels of government -- the Cabinet, Congress, the National Governors' Association, the National Association of Counties, the National Conference of Mayors, the National Conference of State Legislatures, as well as members of the general public. The Council would hold hearings to obtain input from public and private groups as well as experts. It would conduct research on issues brought before it and prepare an annual report documenting its efforts. The Council itself would meet infrequently, but intensive staff work would take place to resolve identified issues.

To assure maximum participation in Council activities and maximum pressure for action on identified needs, the Council should be chaired by the President.



AMERICAN PUBLIC WELFARE ASSOCIATION

Kevin W. Concannon, President
A. Sidney Johnson III, Executive Director

PRIORITY ISSUES

RECOMMENDATIONS FOR AFDC/FOOD STAMP SIMPLIFICATION AND COORDINATION

APWA has identified the following priority areas for AFDC and food stamp simplification and coordination. These proposals should be implemented in law or regulation as quickly as possible. The issues are taken from the package of simplification and coordination recommendations adopted by the National Council of State Human Service Administrators December 10, 1992.

The five areas are not in any rank order; all are equally important. Issue number citations refer to the item number of the detailed chart of recommendations dated 7/14/93.

Budget figures have been supplied by the Food and Nutrition Service and the Administration for Children and Families. "Minimal" budget impact indicates a cost so low that it would not be counted for budget purposes.

* * * * *

I. APPLICATION PROCESS

The initial procedures now required to take and process application information present some of the most time consuming and difficult tasks in administering AFDC and food stamps. States believe current requirements can be greatly streamlined without harm to either the accuracy of case data or to applicants' opportunities to provide necessary information.

Recommendation: Simplify the food stamp program and conform it to AFDC by removing current detailed food stamp requirements and replace them with a policy allowing states to deny an application if the household does not provide requested verification within ten days. Simplify both AFDC and food stamps by allowing states to

~~choose what information to verify. Make optional use of the federal IEVS and SAVE systems. (Issues 4, 5, and 7)~~

Change required: regulatory and legislative. *Budget impact:* Food stamps, \$3 million savings; AFDC, minimal.

II. CHANGES AND BUDGETING

Many families, particularly in the Food Stamp Program, hold jobs in which wages change frequently. Participants in both programs also experience frequent changes in their family composition and expenses. States are now required to track these ~~fluctuations~~ closely, a policy that results in repeated contact between the family and the eligibility worker and in numerous changes to the case record. Eligibility workers spend inordinate amounts of time tracking and processing these changes; participants must repeatedly contact workers to report changes; and repeated handling of the case budget contributes to payment errors.

Recommendation: Adopt a proposal regarding ~~estimating earned income and change~~ reporting for non monthly reporting requirements in which adjustments in the budget for anticipated income are tied to a ~~change in the income status~~; not an arbitrary \$25 as in current food stamp policy. This proposal is close to the AFDC policy used in many states. FNS is considering, but has not issued, new regulations which may address some of these concerns. Conform AFDC to food stamp policy regarding the ~~effective date of~~ changes and supplemental benefits to new members. Conform AFDC to food stamps to allow retrospective budgeting of nonmonthly reporters. Conform AFDC to food stamps to eliminate the 10 day reporting requirement for monthly reporters. (Issues 8, 15-17)

Change required: regulatory. *Budget impact* (available to date): minimal.

III. INCOME AND DEDUCTIONS

Perhaps no aspect of eligibility determination is as complex and time-consuming as the calculation of income and deductions from income. Both programs have highly detailed (and frequently different) rules for determining what and how much income is "counted," that is, used in calculating whether a family qualifies for assistance and if so how much. Once income is determined, many families can have their gross income reduced by a variety of expenses and other items deemed necessary for such important purposes as child care or going to work.

Recommendation: Because this issue is so complex, APWA has found it necessary to propose a number of specific recommendations. Briefly, our proposals would completely exclude from consideration several types of income now counted in one or both

programs; conform the two programs in the many detailed areas where they now differ; disregard all educational assistance; and conform the programs with respect to dependent care expenses and the incentive disregards for holding a job.

A particularly difficult issue in this group is that of incentive disregards for wage earners. AFDC and food stamps take substantially different approaches to this issue. Although food stamps is simpler, with its across-the-board deduction of a flat 20 percent, APWA doubts whether this percentage may accurately reflects the true costs of holding a job. Our recommendation is to broaden the work incentive by increasing it to 25 percent. This change would entail some budget costs but is an important support for families trying to achieve self-sufficiency. (Issues 18-20, 31-45.)

Change required: legislative. Budget impact: AFDC, \$15 million; food stamps, \$649 million. Note that almost all costs come from three food stamp issues: the earned income deduction (issue 19), exclusion of HUD utility payments (issue 35), and disregard of the first \$50 of child support payments (issue 45). The latter proposal is contained in the Mickey Leland Act food stamp legislation now in the House reconciliation package.

IV. RECERTIFICATION AND REDETERMINATION

Both AFDC and food stamps provide for renewal or extension of eligibility once a family is receiving assistance. Cases are "redetermined" in AFDC and "recertified" in food stamps through repeating some of the same interview and documentary processes required for initial application. However, the two programs take a fundamentally different approach to this issue: in AFDC, a family is considered eligible continuously until determined otherwise through the redetermination process or other change. In food stamps, a family's eligibility is finite and endures only for the "certification period" assigned based on stability of income and other factors. This fact and other substantial differences have made the recertification/redetermination process extremely cumbersome when any attempt is made to coordinate the handling of both programs for a given family.

Recommendation: Allow an "open-ended" authorization of benefits for all families in both programs, with required reviews of cases at least every 24 months. (Issues 46-47)

Change required: legislative. Budget impact: not yet determined.

V. RESOURCES

Both AFDC and food stamps allow eligible households to have certain resources--an amount of cash on hand and certain items of property, such as their home and personal items. Beyond that simple statement the two programs diverge substantially, and have different rules for both amounts and allowable categories of resources. The issue is a constant source of difficulty for both staff and participants.

Recommendation: In many areas of resource policy our proposal is straightforward and causes minimal budgetary impact. We recommend common definitions of excluded property, like treatment of the value of insurance and burial plans, and the same cash on hand limit. With regard to allowable vehicles, however, our proposal is somewhat more problematic. We believe the simplest and most equitable policy would be the complete exclusion of one vehicle per household, regardless of value, and the counting of the equity value of any other licensed vehicles. However, this change would cost \$280 million in food stamps and \$736 million in AFDC. Nevertheless we support this policy as one that serves the best interests of administrators and clients alike. We note that the Mickey Leland Act now pending in Congress would substantially raise the allowable vehicle value in the Food Stamp Program. (Issues 48-55)

Change required: regulatory and legislative. Budget impact: food stamps, \$280 million; AFDC, \$736 million.

Revised 7-15-93

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1. ADMINISTRATIVE WAIVER AUTHORITY	DEMONSTRATION WAIVER AUTHORITY PROVIDED IN STATUTE. THERE IS NO ADMINISTRATIVE WAIVER AUTHORITY SIMILAR TO THAT IN THE FOOD STAMP PROGRAM.	7 CFR 272.3(c) ALLOWS WAIVERS OF REGULATORY PROVISIONS FOR EXTRAORDINARY TEMPORARY SITUATIONS, MORE EFFECTIVE AND EFFICIENT ADMINISTRATION OF THE PROGRAM, OR UNIQUE GEOGRAPHIC OR CLIMATIC CONDITIONS.	(1) SUPPORT THE EFFORT OF THE ADMINISTRATION FOR CHILDREN AND FAMILIES TO AMEND 45 CFR TO PERMIT APPROVAL OF ADMINISTRATIVE WAIVERS. (2) AMEND FOOD STAMP ACT TO CONFORM WITH AFDC DEMONSTRATION WAIVER AUTHORITY.	1) GROUP FAVORS RECOMMENDATION BUT WILL DISCUSS DETAILS WITH ADVOCATES. GROUP VOTED TO MAINTAIN FSP AVERAGE BENEFIT LEVEL.	REG	a	a	PROPOSED ACF ADMINISTRATIVE WAIVER ON HOLD.
2. APPLICATION PROCESS: ALIEN/CITIZENSHIP DECLARATION	EACH ADULT MUST ATTEST TO HIS/HER ALIEN OR CITIZENSHIP STATUS. ONE ADULT MAY SIGN FOR ALL CHILDREN.	THE APPLICATION FORM MUST INCLUDE A STATEMENT TO BE SIGNED BY ONE ADULT HOUSEHOLD MEMBER CERTIFYING THAT THE INFORMATION IN THE APPLICATION IS TRUE, INCLUDING INFORMATION ABOUT THE CITIZENSHIP OR ALIEN STATUS OF HOUSEHOLD MEMBERS.	AMEND SOCIAL SECURITY ACT TO ELIMINATE REQUIREMENT THAT EACH ADULT SIGN DECLARATION.	ACCEPTED RECOMMENDATION.	LAW	n/a	a	ALIEN DECLARATION PROVISION IN RECONCILIATION BILL.

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3. APPLICATION PROCESS: APPLICATION FORM	THE AGENCY SHALL REQUIRE A WRITTEN APPLICATION, SIGNED UNDER PENALTY OF PERJURY, ON A FORM PRESCRIBED BY THE STATE, FROM THE APPLICANT OR AUTHORIZED REPRESENTATIVE.	ACT CONTAINS SPECIFIC REQUIREMENTS FOR APPLICATION CONTENT, MANDATES USE OF A SIMPLIFIED, UNIFORM NATIONAL FORM OR APPROVED SUBSTITUTE, AND REQUIRES A COMBINED APPLICATION FOR PA HOUSEHOLDS AND GA HOUSEHOLDS IF STATE HAS STATEWIDE GA APPLICATION FORM.	FNS AND ACF JOINTLY DEVELOP A GENERIC RIGHTS AND RESPONSIBILITIES DOCUMENT. AMEND FOOD STAMP ACT TO ELIMINATE REQUIREMENTS FOR SPECIFIC APPLICATION LANGUAGE AND REQUIREMENT THAT STATE AGENCIES USE APPLICATION APPROVED BY FNS.	ACCEPTED RECOMMENDATION, SUBJECT TO ADDITIONAL STATE COMMENTS ON PROPOSED LANGUAGE.	LAW	a	a	FNS AND ACF DEVELOPED EASY-TO-READ STATEMENTS OF RIGHTS AND RESPONSIBILITIES THAT ARE GENERIC TO THE EXTENT POSSIBLE. DRAFT STATEMENTS BEING REVISED IN RESPONSE TO COMMENTS.
4. APPLICATION PROCESS: DELAY PROCEDURES	NO CORRESPONDING REQUIREMENT.	REGULATIONS PROVIDE DETAILED PROCEDURES AGENCY MUST FOLLOW IF HOUSEHOLD'S ELIGIBILITY IS NOT DETERMINED WITHIN 30 DAYS AFTER APPLICATION.	FOOD STAMPS SHOULD CONFORM WITH AFDC.	ACCEPTED RECOMMENDATION.	REG	a	n/a	SEE PROCESSING STANDARDS.

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5. APPLICATION PROCESS: PROCESSING STANDARDS	A DECISION MUST BE REACHED WITHIN STATE-SET STANDARDS, NOT TO EXCEED 45 DAYS. STATES MUST PROVIDE BENEFITS FROM THE EARLIER OF THE DATE OF AUTHORIZATION OR 30 DAYS FROM APPLICATION. THEY MAY PROVIDE PRORATED BENEFITS FROM THE DATE OF APPLICATION.	CLIENTS MUST RECEIVE BENEFITS RETROACTIVE TO THE DATE OF APPLICATION WITHIN 30 DAYS OF APPLICATION UNDER NORMAL PROCESSING AND WITHIN 5 DAYS FOR EXPEDITED SERVICE.	ALLOW STATES TO DENY APPLICATION IF HOUSEHOLD DOES NOT PROVIDE REQUESTED VERIFICATION WITHIN 10 DAYS.	ACCEPTED RECOMMENDATION TO HAVE FNS MAKE AVAILABLE TO STATES THE OPTION TO DENY CASE AFTER 10 DAYS IF REQUESTED VERIFICATION IS NOT RECEIVED. REINSTATEMENT REQUIRED IF HH COMPLIES.	REG	a	n/a	
6. APPLICATION PROCESS: SCHEDULING SECOND INTERVIEW	CLIENT MUST BE NOTIFIED ORALLY AND IN WRITING OF RIGHTS AND RESPONSIBILITIES. THERE IS NO REQUIREMENT FOR THE AGENCY TO RESCHEDULE A MISSED INTERVIEW.	REGULATIONS REQUIRE AGENCY TO RESCHEDULE INTERVIEW IF CLIENT DOES NOT APPEAR FOR THE ONE ORIGINALLY SCHEDULED.	ELIMINATE REQUIREMENT TO SCHEDULE SECOND APPOINTMENT.	ACCEPTED RECOMMENDATION.	REG	a	n/a	

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7. APPLICATION PROCESS: VERIFICATION	INCOME MUST BE VERIFIED THROUGH IEVS, SOCIAL SECURITY NUMBERS THROUGH SSA, AND ALIEN DOCUMENTS THROUGH SAVE. STATES MAY ESTABLISH OTHER VERIFICATION REQUIREMENTS. DECISIONS RE ELIGIBILITY OR INELIGIBILITY MUST BE SUPPORTED BY FACTS IN THE CASE RECORD.	IN ADDITION TO REQUIRED VERIFICATION THROUGH IEVS AND SAVE, REGULATIONS MANDATE VERIFICATION OF INCOME, ALIEN STATUS, UTILITY AND MEDICAL EXPENSES (WHEN ACTUAL IS CLAIMED), SSN, IDENTITY, RESIDENCY, DISABILITY, AND HOUSEHOLD COMPOSITION (IF QUESTIONABLE)	SIMPLIFY VERIFICATION REQUIREMENTS SO STATES CAN DECIDE WHAT TO VERIFY. MAKE USE OF IEVS AND SAVE OPTIONAL.	ACCEPTED RECOMMENDATION.	LAW	\$-3	a	
8. BUDGETING (PROSPECTIVE): BEST ESTIMATE/ANTICIPATING INCOME	USES BEST ESTIMATE OF INCOME AND CIRCUMSTANCES BASED ON THE AGENCY'S REASONABLE EXPECTATION AND KNOWLEDGE OF CURRENT, PAST AND FUTURE CIRCUMSTANCES. INTERMITTENT INCOME MAY BE PRORATED.	INCOME RECEIVED DURING THE PAST 30 DAYS IS USED AS AN INDICATOR OF FUTURE INCOME, WITH SPECIFIED EXCEPTIONS. IF THE AMOUNT OF INCOME OR DATE THAT IT WILL BE RECEIVED IS UNCERTAIN, IT IS NOT USED. HOUSEHOLDS MAY ELECT TO HAVE INCOME AVERAGED.	ADOPT AFDC POLICY FOR FSP. AFDC POLICY IS LESS ERROR-PRONE AND ALLOWS WORKERS MORE FLEXIBILITY.	ACCEPTED RECOMMENDATION, SUBJECT TO ADDITIONAL STATE COMMENTS ON PROPOSED LANGUAGE.	REG	a	n/a	FNS DRAFTING RULE WITH CHANGES IN PROCEDURES FOR ANTICIPATING INCOME.

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9. BUDGETING (RETROSPECTIVE): INCOME FROM A TERMINATED SOURCE	INCOME RECEIVED IN THE BEGINNING MONTHS FROM A NONCONTINUOUS SOURCE WHICH WAS COUNTED PROSPECTIVELY IS DISREGARDED IN THE FIRST AND SECOND MONTHS OF RETROSPECTIVE BUDGETING. THE DISREGARD DOES NOT APPLY IF INCOME IS RECEIVED AGAIN FROM A SIMILAR SOURCE.	INCOME RECEIVED IN BEGINNING MONTHS FROM A TERMINATED SOURCE WHICH WAS COUNTED PROSPECTIVELY IS DISREGARDED FOR THE FIRST AND SECOND MONTHS OF RETROSPECTIVE BUDGETING. THE DISREGARD APPLIES UNLESS INCOME WAS RECEIVED AGAIN FROM THE SAME FUNDING SOURCE	DIFFERENCE NO LONGER EXISTS. [FNS COMMENT: MAJOR DIFFERENCE IN LENGTH OF DISREGARD NO LONGER EXISTS. THERE IS A MINOR DIFFERENCE IN THE DEFINITION OF WHAT CONSTITUTES A TERMINATED SOURCE.]	DROPPED.		n/a	n/a	
10. BUDGETING (RETROSPECTIVE): SUSPENSION	IF INELIGIBILITY WILL BE FOR ONE MONTH ONLY, ASSISTANCE MAY BE SUSPENDED IN THE PAYMENT MONTH BASED ON INCOME AND CIRCUMSTANCES IN THE BUDGET MONTH. UNIT MUST GENERALLY BE BUDGETED RETROSPECTIVELY THE MONTH AFTER SUSPENSION.	REGULATIONS GIVE STATES OPTION OF SUSPENDING HOUSEHOLDS PROSPECTIVELY IF INELIGIBILITY WILL EXIST FOR ONE MONTH ONLY. HOUSEHOLDS MUST BE BUDGETED RETROSPECTIVELY THE MONTH AFTER SUSPENSION.	IN BOTH PROGRAMS SUSPEND RETROSPECTIVELY IF THERE IS A ONE-TIME CHANGE IN INCOME WHICH CAUSES INELIGIBILITY. CONTINUE RETROSPECTIVE BUDGETING CYCLE UNLESS THERE IS A CHANGE WHICH BY LAW OR STATE OPTION CAUSES PROSPECTIVE BUDGETING.	ACCEPTED RECOMMENDATION.	REG	a	a	RETROSPECTIVE SUSPENSION INCLUDED IN DRAFT FSP SIMPLIFICATION RULE.

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ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
11. BUDGETING: CONVERTING INCOME TO A MONTHLY AMOUNT	NO PROVISION, BUT STATES MAY USE CONVERSION IN CALCULATING A BEST ESTIMATE FOR CONSISTENCY WITH FOOD STAMPS.	INCOME RECEIVED WEEKLY MAY BE MULTIPLIED BY 4.3 AND BIWEEKLY INCOME BY 2.15 TO ARRIVE AT A MONTHLY FIGURE, OR THE STATE'S PUBLIC ASSISTANCE CONVERSION FACTOR MAY BE USED.	AMEND AFDC REGULATION TO MAKE CONVERSION FACTORS CONSISTENT WITH FSP REGULATIONS.	DROPPED.		n/a	n/a	DROPPED BECAUSE STATES CAN USE CONSISTENT PROCEDURES WITHOUT REGULATION.
12. BUDGETING: PRORATION OF CONTRACT AND SELF-EMPLOYMENT INCOME	ALLOWS STATES TO AVERAGE OR PRORATE CONTRACT INCOME OVER THE PERIOD OF THE CONTRACT AND SELF-EMPLOYMENT INCOME OVER THE PERIOD THE INCOME COVERS.	REQUIRES ANNUALIZING CONTRACT AND SELF-EMPLOYMENT INCOME RECEIVED IN A PERIOD SHORTER THAN ONE YEAR IF IT IS THE HOUSEHOLD'S ANNUAL INCOME. IF INCOME IS NOT THE HOUSEHOLD'S ANNUAL INCOME, IT IS PRORATED OVER THE PERIOD IT IS INTENDED TO COVER.	NO DIFFERENCE EXISTS BECAUSE AFDC REGULATIONS ALLOW INCOME TO BE PRORATED OVER THE PERIOD THE CONTRACT COVERS OR COUNTED IN THE MONTH IT IS RECEIVED.	NO CHANGE IN CURRENT REGULATIONS IS NEEDED.		n/a	n/a	

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13. CHANGES: EFFECTIVE DATE	CHANGE THAT RESULTS IN OVERPAYMENT OR UNDERPAYMENT IS EFFECTIVE IN THE MONTH OF THE CHANGE.	EFFECTIVE DATE DEPENDS ON TIME FRAMES FOR REPORTING AND ACTING ON CHANGES.	AFDC SHOULD CONFORM TO FSP POLICY ON EFFECTIVE DATE. APPLY TO BOTH PROSPECTIVE AND RETROSPECTIVE BUDGETING. ADOPT AFDC PAYMENT ADJUSTMENT LAG (PAL) QC CONCEPT FOR FSP. ADOPT FSP OVERPAYMENT ESTABLISHMENT AND CLAIMS COLLECTION POLICY FOR AFDC.	ACCEPTED RECOMMENDATION.	REG	\$5c	\$-17	
14. CHANGES: MONTHLY REPORTING AND BUDGETING REQUIREMENTS	MONTHLY REPORTING IS OPTIONAL. HOUSEHOLDS NOT REQUIRED TO REPORT MONTHLY MUST BE BUDGETED PROSPECTIVELY UNLESS WAIVER HAS BEEN GRANTED FOR CONSISTENCY WITH FSP.	MONTHLY REPORTING IS OPTIONAL, BUT PROHIBITED FOR CERTAIN CATEGORIES OF HOUSEHOLDS THAT MUST BE BUDGETED PROSPECTIVELY. OTHER HOUSEHOLDS NOT REQUIRED TO REPORT MONTHLY MAY BE BUDGETED PROSPECTIVELY OR RETROSPECTIVELY.	CHANGE AFDC LEGISLATION TO ALLOW NONMONTHLY REPORTING HOUSEHOLDS TO BE BUDGETED RETROSPECTIVELY.	ACCEPTED RECOMMENDATION.	LAW	n/a	a	WAS IN HR 11.

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15. CHANGES: NOTICE OF ADVERSE ACTION	ADVANCE NOTICE NOT REQUIRED WHEN, AMONG OTHER REASONS, MAIL IS RETURNED WITHOUT A FORWARDING ADDRESS.	NOTICE OF ADVERSE ACTION REQUIRED BY 7 CFR 273.13 NOT REQUIRED WHEN, AMONG OTHER REASONS, THE HOUSEHOLD VOLUNTARILY REQUESTS IN THE PRESENCE OF A CASEWORKER THAT ITS PARTICIPATION BE TERMINATED.	CONFORM TO FSP POLICY RE TOLL-FREE NUMBER AND LEGAL AID REFERRAL ON NOTICE, MASS CHANGES, AND VOLUNTARY TERMINATION OF PARTICIPATION. CONFORM TO AFDC POLICY RE RETURNED MAIL.	COMMITTEE RECOMMENDED DROPPING ISSUE OF TOLL-FREE NUMBER AND LEGAL AID INFO. ACCEPTED OTHER RECOMMENDATIONS.	REG	a	a	PROVISION REGARDING RETURNED MAIL INCLUDED IN FSP PROPOSED SIMPLIFICATION RULE.
16. CHANGES: REPORTING REQUIREMENTS	RECIPIENTS MUST REPORT PROMPTLY ALL CHANGES IN INCOME, RESOURCES AND OTHER CIRCUMSTANCES AFFECTING ELIGIBILITY OR BENEFITS AS THEY BECOME AWARE OF THEM AND ALSO ON MONTHLY REPORT IF MONTHLY REPORTING IS REQUIRED.	MONTHLY REPORTING HOUSEHOLDS NEED NOT REPORT CHANGES OUTSIDE MONTHLY REPORT FORM. CHANGE REPORTERS MUST REPORT CHANGES IN INCOME AND MEDICAL EXPENSES OF MORE THAN \$25, HOUSEHOLD COMPOSITION, RESIDENCE, LIQUID RESOURCES, AND VEHICLES WITHIN 10 DAYS.	HOUSEHOLD/ASSISTANCE UNIT REQUIRED TO REPORT ONLY CHANGES IN SOURCE OF INCOME, RATE OF PAY, EMPLOYMENT STATUS, CHANGE OF ADDRESS, HOUSEHOLD/UNIT COMPOSITION. CHANGE AFDC REGULATIONS TO REQUIRE MONTHLY REPORTERS TO REPORT CHANGES ONLY ON MONTHLY REPORT.	ACCEPTED RECOMMENDATIONS.	REG	b	b	SIMILAR CHANGE IN REPORTING REQUIREMENTS FOR EARNINGS IN FSP DRAFT RULE.

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17. CHANGES: SUPPLEMENTAL BENEFITS FOR NEW MEMBERS	NEW PERSON IS TREATED AS AN APPLICANT AND ADDED THE DATE HE/SHE ENTERED THE HOUSEHOLD OR DATE DETERMINED ELIGIBLE. SUPPLEMENTAL BENEFITS ARE ISSUED.	SUPPLEMENTAL BENEFITS MAY BE ISSUED FOR A NEW MEMBER IN MONTH OF REPORTED CHANGE UNDER PROSPECTIVE BUDGETING. SUPPLEMENTAL BENEFITS MAY NOT BE ISSUED UNDER RETROSPECTIVE BUDGETING FOR MONTH OF CHANGE, BUT ALLOTMENT MAY BE INCREASED IF NOT ALREADY ISSUED.	CONFORM AFDC TO FOOD STAMP POLICY.	ACCEPTED RECOMMENDATION.	REG	a	d	PROPOSAL TO ALLOW CONSISTENCY WITH AFDC INCLUDED IN DRAFT FSP PROPOSED REGULATION.
18. DEDUCTIONS: DEPENDENT CARE	FOR FULLTIME WORKERS AND JOBS PARTICIPANTS: ACTUAL COSTS UP TO \$175 PER MO. PER DEPENDENT CHILD 2 AND OVER OR INCAPACITATED ADULT LIVING IN SAME HOME AND RECEIVING AFDC AND UP TO \$200 PER MO. PER CHILD UNDER 2. STATE MAY SET LESSER AMOUNT FOR PARTTIME.	ACTUAL NOT TO EXCEED \$160 PER CHILD OR OTHER DEPENDENT WHEN CARE IS NEEDED TO ACCEPT OR CONTINUE EMPLOYMENT, OR TRAINING OR EDUCATION THAT IS PREPARATORY TO EMPLOYMENT.	SET LIMITS AT \$175 PER INDIVIDUAL (\$200 FOR CHILDREN UNDER TWO). ALLOW DEDUCTION FOR SEEKING EMPLOYMENT, EMPLOYMENT, OR ATTENDING TRAINING OR SCHOOL. SUBTRACT DEDUCTION FROM HOUSEHOLD OR UNIT'S INCOME AFTER OTHER DEDUCTIONS HAVE BEEN SUBTRACTED.	DECIDED TO DELETE LAST SENTENCE. RECOMMENDED THAT AFDC CAPS FOR DEPENDENT CARE BE USED AND DEDUCTION BE ALLOWED FROM UNEARNED INCOME FOR TRAINING/EDUCATION IN BOTH PROGRAMS.	LAW	\$1	b	IN LELAND BILL.

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19. DEDUCTIONS: EARNED INCOME DEDUCTION	DISREGARDS \$90 OF INDIVIDUAL'S EARNINGS. \$30 AND ONE-THIRD OF REMAINDER DISREGARDED IN 4 CONSECUTIVE MONTHS. THEN \$30 DISREGARDED IN 8 CONSECUTIVE MONTHS. NOT ALLOWED AGAIN UNTIL PERSON OFF AFDC FOR 12 CONSECUTIVE MONTHS.	DEDUCTS 20 PERCENT OF ALL EARNINGS.	DEDUCT 25 PERCENT OF GROSS EARNED INCOME IN ANY MONTH THE HOUSEHOLD OR ASSISTANCE UNIT HAD EARNINGS AS EARNED INCOME DEDUCTION FOR BOTH PROGRAMS.	WORK INCENTIVES NEED FURTHER CONSIDERATION.	LAW	\$298	b	
20. DEDUCTIONS: EARNED INCOME DEDUCTION PENALTY	\$90, \$30 AND ONE-THIRD, DEPENDENT CARE DISREGARDS NOT ALLOWED IF INDIVIDUAL VOLUNTARILY QUIT OR FAILED TO ACCEPT JOB, RETURN MONTHLY REPORT TIMELY, OR REQUESTED CASE TERMINATION TO AVOID RECEIVING \$30 AND ONE-THIRD DISREGARD FOR 4 CONSECUTIVE MONTHS.	WHEN CALCULATING OVERISSUANCE, EARNED INCOME DEDUCTION IS NOT ALLOWED ON PORTION OF EARNED INCOME HOUSEHOLD MEMBER WILLFULLY FAILED TO REPORT.	DO NOT ALLOW EARNED INCOME DEDUCTION IN ANY MONTH THE INCOME WAS NOT REPORTED BY THE HOUSEHOLD OR ASSISTANCE UNIT, WHETHER THROUGH INTENTIONAL PROGRAM VIOLATION OR INADVERTENT CLIENT ERROR. DISALLOWANCE AFFECTS CALCULATION OF OVERPAYMENTS, NOT BENEFITS.	ACCEPTED RECOMMENDATION.	LAW	\$-1	a	

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21. DEDUCTIONS: EXCESS MEDICAL DEDUCTION	N/A	A DEDUCTION IS ALLOWED FOR THAT PORTION OF MEDICAL EXPENSES IN EXCESS OF \$35 PER MONTH INCURRED BY ANY HOUSEHOLD MEMBER WHO IS ELDERLY OR DISABLED.	AUTHORIZE A TWO-TIERED STANDARD FOR EACH STATE TO BE CALCULATED BY EACH STATE AND APPROVED BY FNS.	AGREED TO RECOMMEND THAT MEDICAL DEDUCTION BE ELIMINATED AND THAT HOUSEHOLDS ADVERSELY AFFECTED BE COMPENSATED BY OTHER CHANGE, POSSIBLY IN MINIMUM BENEFIT LEVEL.	LAW	\$-87	n/a	
22. DEDUCTIONS: STANDARD SHELTER DEDUCTION	N/A	A DEDUCTION IS ALLOWED FOR ACTUAL SHELTER EXPENSES IN EXCESS OF 50 PERCENT OF THE HOUSEHOLD'S NET INCOME UP TO AN ANNUALLY UPDATED CAP, CURRENTLY SET AT \$194. HOUSEHOLDS CONTAINING AN ELDERLY OR DISABLED MEMBER ARE NOT SUBJECT TO THE CAP.	ELIMINATE THE REQUIREMENT TO REPORT CHANGES IN SHELTER DURING THE CERTIFICATION PERIOD. LET EACH STATE DEVELOP A STANDARD SHELTER EXPENSE USING FNS-DEVELOPED GUIDELINES. HOUSEHOLD WOULD VERIFY TO GET ACTUAL IF HIGHER.	ACCEPTED RECOMMENDATION RE NO REQUIRED REPORTING OF CHANGES IN SHELTER DURING CERT PERIOD. RECOMMENDED FNS ALLOW STATES TO CONDUCT DEMO PROJECTS USING STANDARD SHELTER EXPENSE.	LAW	b	n/a	MODIFICATION OF CURRENT DEMONSTRATION PROJECT AUTHORITY NEEDED TO ALLOW DEMONSTRATION PROJECTS WHICH USE STANDARD AND DO NOT ALLOW HOUSEHOLD OPTION TO USE HIGHER ACTUAL COSTS.

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23. ELIGIBILITY: ALIEN STATUS	ALLOWS PARTICIPATION BY ALIENS ADMITTED FOR PERMANENT RESIDENCE OR PERMANENTLY RESIDING UNDER COLOR OF LAW (PRUCOL).	FOOD STAMP ACT LIMITS ALIEN PARTICIPATION TO THOSE ADMITTED UNDER SPECIFIED SECTIONS OF THE IMMIGRATION AND NATIONALITY ACT.	ADOPT AFDC PRUCOL PROVISION FOR FSP.	ACCEPTED RECOMMENDATION.	LAW	a	n/a	ACF AND FNS TO EXPLORE COMMITTEE REQUEST TO CLASSIFY ALIENS BY TYPE OF DOCUMENTATION.
24. ELIGIBILITY: CERTIFIED UNIT	ASSISTANCE UNIT CONSISTS OF DEPENDENT CHILDREN UNDER 18 (OR 18 IF IN SCHOOL AND WILL FINISH BEFORE 19) DEPRIVED OF PARENTAL SUPPORT AND LIVING IN THE HOME OF THE PARENT OR SPECIFIED RELATIVES. THE NEEDS, INCOME AND RESOURCES OF ALL IN UNIT ARE INCLUDED.	HOUSEHOLD USUALLY CONSISTS OF PERSONS WHO PURCHASE AND PREPARE MEALS TOGETHER. PARENTS AND CHILDREN AND SIBLINGS MAY NOT BE SEPARATE HOUSEHOLDS UNLESS THE PARENT OR SIBLING IS OVER 60 OR DISABLED OR THE CHILD OR SIBLING HAS A MINOR CHILD.	RECOMMENDS NO CHANGE IN DEFINITIONS OF CERTIFIED UNIT BECAUSE OF FUNDAMENTAL DIFFERENCES IN THE PROGRAMS. POSSIBLE ANSWER WOULD BE USE OF STANDARDIZED ALLOTMENTS FOR JOINT FSP/AFDC HOUSEHOLDS.	ACCEPTED RECOMMENDATION. STANDARDIZED ALLOTMENTS OPTION DROPPED.		n/a	n/a	LELAND BILL CONTAINS CHANGES IN FOOD STAMP HOUSEHOLD DEFINITION.
25. ELIGIBILITY: CHILD SUPPORT ASSIGNMENT AND COOPERATION	ASSIGNING TO THE STATE AGENCY ANY RIGHTS TO CHILD OR SPOUSAL SUPPORT AND COOPERATING WITH THE CHILD SUPPORT COLLECTION AGENCY IN ESTABLISHING PATERNITY AND OBTAINING SUPPORT PAYMENTS ARE CONDITIONS OF ELIGIBILITY.	NO COMPARABLE PROVISION.	CHILD SUPPORT COOPERATION SHOULD BE STATE OPTION. SAME GOOD CAUSE CRITERIA AS AFDC. DISREGARD FIRST \$50 OF CHILD SUPPORT. PROVIDE FEDERAL FINANCIAL INCENTIVES AND FFP AT CHILD SUPPORT FFP LEVEL. WAIVE INITIAL FEE.	ACCEPTED RECOMMENDATION THAT IN FSP: 1) FAMILIES BE ENCOURAGED TO COOPERATE WITH CHILD SUPPORT. 2) OPPOSE LEGISLATION TO REQUIRE COOPERATION WITH CHILD SUPPORT. 3) DISREGARD \$50.	LAW	n/a	n/a	

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26. ELIGIBILITY: POTENTIAL SOURCES OF INCOME	AGENCY MUST ESTABLISH AND CARRY OUT POLICIES WITH REFERENCE TO APPLICANTS' AND RECIPIENTS' POTENTIAL SOURCES OF INCOME THAT CAN BE DEVELOPED TO A STATE OF AVAILABILITY.	THERE IS NO REQUIREMENT THAT APPLICANTS OR RECIPIENTS APPLY FOR OTHER ASSISTANCE AS A CONDITON OF ELIGIBILITY.	REVISED POSITION PAPER RECOMMENDED LEGISLATIVE CHANGE TO FOOD STAMP ACT TO ENCOURAGE, BUT NOT REQUIRE, APPLICANTS TO APPLY FOR OTHER POTENTIAL SOURCES OF INCOME. NO CONSENSUS WAS REACHED ON THIS ISSUE.	CONSENSUS NOT REACHED.		n/a	n/a	DROPPED.
27. ELIGIBILITY: RESIDENCY REQUIREMENT	ASSISTANCE UNIT MUST RESIDE IN THE STATE, BUT THERE IS NO DURATIONAL REQUIREMENT.	HOUSEHOLD MUST RESIDE IN THE PROJECT AREA IN WHICH IT APPLIES, BUT THERE IS NO DURATIONAL REQUIREMENT.	FS ACT IS FLEXIBLE ENOUGH TO ALLOW STATES TO CONFORM FOOD STAMP POLICY TO AFDC POLICY WITHOUT A REGULATORY CHANGE. CURRENT REGULATIONS SHOULD REMAIN IN PLACE SO AS NOT TO PENALIZE STATES THAT DO NOT HAVE SYSTEMS NEEDED TO IMPLEMENT POLICY.	ACCEPTED RECOMMENDATION.	REG	a	n/a	OPTION FOR STATE RESIDENCY IN PROPOSED FSP SIMPLIFICATION RULE.

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28. ELIGIBILITY: SOCIAL SECURITY NUMBERS	APPLICANT MUST PROVIDE SSN OR APPLY FOR ONE.	APPLICANT MUST PROVIDE NUMBER OR APPLY FOR ONE, BUT GOOD CAUSE ALLOWED FOR FAILURE TO APPLY.	CHANGE AFDC REGULATIONS TO INCLUDE FSP GOOD CAUSE CRITERIA.	LEAVE EACH PROGRAM AS IS.		n/a	n/a	DROPPED.
29. ELIGIBILITY: STRIKER DEFINITION	FAMILY INELIGIBLE IF ANY CARETAKER RELATIVE IS PARTICIPATING IN A STRIKE ON THE LAST DAY OF THE MONTH. INDIVIDUAL'S NEEDS NOT INCLUDED IF INDIVIDUAL IS ON STRIKER LAST DAY OF THE MONTH.	HOUSEHOLD IS INELIGIBLE IF ANY MEMBER IS ON STRIKE UNLESS THE HOUSEHOLD WAS ELIGIBLE PRIOR TO THE STRIKE OR THE STRIKING MEMBER WAS EXEMPT FROM WORK REGISTRATION THE DAY PRIOR TO THE STRIKE.	ELIMINATE STRIKER PROVISIONS. STRIKER ELIGIBILITY WOULD BE DETERMINED ON SAME BASIS AS THAT OF OTHER APPLICANTS AND RECIPIENTS.	ACCEPTED RECOMMENDATION. ISSUE WILL BECOME LOW PRIORITY IF COST IS HIGH.	LAW	\$56	a	
30. ELIGIBILITY: STUDENTS	NO RESTRICTIONS ON STUDENT ELIGIBILITY IN ADDITION TO THOSE FOR OTHER INDIVIDUALS.	STUDENTS MUST MEET SPECIFIC ELIGIBILITY CRITERIA IN ADDITION TO THOSE WHICH APPLY TO OTHER INDIVIDUALS.	WAIVE STUDENT ELIGIBILITY DETERMINATION FOR RECIPIENTS OF A STATE'S GA PROGRAM BENEFITS AND RECIPIENTS OF FINANCIAL EDUCATION ASSISTANCE BASED ON NEED, REGARDLESS OF SOURCE.	ACCEPTED RECOMMENDATION.	LAW	\$67	n/a	

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31. INCOME: COMPLEMENTARY PROGRAMS	PERMITS STATES TO DISREGARD THE VALUE OF ASSISTANCE PAYMENTS THAT ARE COMPLEMENTARY AND NOT DUPLICATIVE.	WITH SPECIFIED EXCEPTIONS, GENERALLY COUNTS STATE-FUNDED ASSISTANCE WHETHER PAID DIRECTLY OR VENDORED.	AMEND FOOD STAMP ACT TO ALLOW A STATE THAT EXEMPTS FUNDS FROM A COMPLEMENTARY PROGRAM IN AFDC TO ALSO EXEMPT INCOME FROM THAT PROGRAM FOR FOOD STAMPS.	ACCEPTED RECOMMENDATION.	LAW	b	n/a	
32. INCOME: EARNINGS OF 18-YEAR-OLD HIGH SCHOOL STUDENTS	DISREGARDS EARNINGS OF DEPENDENT CHILD RECIPIENT WHO IS FULL OR PART-TIME STUDENT FOR NEEDS AND BENEFIT DETERMINATION. STATE OPTION TO DISREGARD EARNINGS OF FULL-TIME STUDENT APPLICANT OR RECIPIENT FOR NEEDS AND ELIGIBILITY FOR UP TO 6 MONTHS.	COUNTS AS EARNED INCOME.	EXCLUDE INCOME OF 18 YEAR-OLD HIGH SCHOOL STUDENTS UNTIL THEY REACH 19 AS LONG AS THEY MEET THE DEFINITION OF A CHILD FOR A PARTICULAR STATE'S AFDC PROGRAM.	ACCEPTED RECOMMENDATION.	LAW	\$8	n/a	IN LELAND BILL.

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33. INCOME: EARNINGS OF STUDENTS UNDER 18	DISREGARDS EARNINGS OF DEPENDENT CHILD RECIPIENT WHO IS FULL-TIME OR PART-TIME STUDENT FOR NEEDS AND BENEFIT DETERMINATION. STATE OPTION TO DISREGARD EARNINGS OF FULL-TIME STUDENT APPLICANT OR RECIPIENT FOR NEEDS AND ELIGIBILITY FOR UP TO 6 MONTHS.	EXCLUDES IF STUDENT IS IN SCHOOL AT LEAST HALF TIME AND IS UNDER PARENTAL CONTROL.	EXCLUDE EARNINGS OF FULL OR PART-TIME STUDENTS UNDER 18 FOR BOTH ELIGIBILITY AND BENEFIT DETERMINATIONS FOR BOTH PROGRAMS.	ACCEPTED RECOMMENDATION.	LAW	a	a	
34. INCOME: ENERGY ASSISTANCE	EXCLUDES ASSISTANCE PROVIDED UNDER LOW-INCOME HOME ENERGY ASSISTANCE ACT. STATES HAVE OPTION TO EXCLUDE ASSISTANCE FROM OTHER SPECIFIED TYPES OF PROVIDERS.	EXCLUDES CASH OR IN-KIND ENERGY ASSISTANCE UNDER FEDERAL LAW AND WITH FNS APPROVAL FROM SOME STATE AND LOCAL PROGRAMS, INCLUDING ASSISTANCE COMBINED WITH PUBLIC OR GENERAL ASSISTANCE PROGRAMS.	DISREGARD FOR BOTH PROGRAMS ANY ENERGY PAYMENT BASED ON FINANCIAL NEED. ENERGY ASSISTANCE IS DEFINED AS ANY ASSISTANCE PAID TO OR ON BEHALF OF A HOUSEHOLD TO COVER THE PAYMENT FOR FUEL TO HEAT OR COOL RESIDENCE, WHICH IS BASED ON FINANCIAL NEED.	ACCEPTED RECOMMENDATION.	LAW	b	b	

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35. INCOME: HUD UTILITY PAYMENTS	STATES HAVE OPTION TO COUNT OR DISREGARD RENT OR HOUSING SUBSIDIES AS INCOME, BUT MAY COUNT ONLY THE AMOUNT THAT EXCEEDS THE SHELTER AMOUNT ESTABLISHED IN THE PAYMENT STANDARD FOR AN ASSISTANCE UNIT OF THE SAME SIZE AND COMPOSITION.	VENDOR PAYMENTS TO LANDLORD EXCLUDED. DIRECT PAYMENTS TO HOUSEHOLD AND VENDOR PAYMENTS TO UTILITY PROVIDER COUNTED. AMOUNT HOUSEHOLD OWES LANDLORD AFTER HUD PAYMENTS IS ALLOWED AS RENT EXPENSE. IN 3RD CIRCUIT, HUD UTILITY PAYMENTS EXCLUDED.	EXCLUDE FROM INCOME FOR BOTH PROGRAMS. TREAT AS ISSUE SEPARATE FROM ENERGY ASSISTANCE.	ACCEPTED RECOMMENDATION.	LAW	\$160	n/a	
36. INCOME: IN-KIND INCOME/VENDOR PAYMENTS	EARNED IN-KIND INCOME COUNTED AS INCOME. STATE OPTION TO DISREGARD SUPPORT AND MAINTENANCE IN-KIND ASSISTANCE FURNISHED BY PRIVATE NON-PROFIT AGENCY OR SPECIFIED HOME ENERGY PROVIDERS. STATE OPTION TO COUNT OR DISREGARD UNEARNED IN-KIND INCOME.	EXCLUDES IN-KIND INCOME. UNLESS SPECIFICALLY EXCLUDED, THIRD-PARTY PAYMENTS ARE COUNTED AS INCOME IF FUNDS ARE LEGALLY OBLIGATED TO BE PAID TO THE HOUSEHOLD.	EXCLUDE IN-KIND BENEFITS AS INCOME FOR BOTH PROGRAMS. ADOPT FSP VENDOR PAYMENT POLICY FOR AFDC.	ACCEPTED RECOMMENDATIONS.	LAW	\$-3 c	\$9	

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37. INCOME: INCOME EXCLUDED BY OTHER LAWS	EXCLUSIONS FOR EDUCATION ASSISTANCE, INDIAN PER CAPITA PAYMENTS, JTPA, AND OTHERS REQUIRED BY LAW DIFFER FROM FOOD STAMP EXCLUSIONS.	EXCLUSIONS FOR EDUCATION ASSISTANCE, INDIAN PER CAPITA PAYMENTS, JTPA, AND OTHERS REQUIRED BY LAW DIFFER FROM THE AFDC EXCLUSIONS.	AMEND SOCIAL SECURITY ACT AND FOOD STAMP ACT TO MAKE LISTS OF EXCLUDED INCOME IDENTICAL. AMEND BOTH LAWS TO ALLOW THE SECRETARIES OF AGRICULTURE AND DHHS TO ISSUE REGULATIONS AT ANY TIME ANOTHER LAW MAKES INCOME FROM A PROGRAM EXEMPT FOR AFDC OR FSP.	ACCEPTED RECOMMENDATION.	LAW	b	b	
38. INCOME: INCOME OF INELIGIBLE (DISQUALIFIED) MEMBERS	TREATMENT OF THE INCOME OF AN INDIVIDUAL LIVING WITH THE UNIT BUT NOT PARTICIPATING DEPENDS ON THE REASON FOR NONPARTICIPATION. EXCEPT FOR INDIVIDUALS DISQUALIFIED FOR SPECIFIED REASONS, STATES HAVE OPTION TO ALLOCATE INCOME OF NONPARTICIPATING MEMBERS.	TREATMENT OF INCOME OF INELIGIBLE MEMBER DEPENDS ON THE REASON FOR INELIGIBILITY.	GIVE THIS DIFFERENCE LOW PRIORITY OR DROP IT UNTIL COORDINATION IS ACHIEVED IN THE REASONS FOR DISQUALIFICATION FROM PROGRAM PARTICIPATION.	ACCEPTED RECOMMENDATION. DROP AS INCOME ISSUE.		n/a	n/a	

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39. INCOME: IRREGULAR INCOME	STATE OPTION TO DISREGARD SMALL NONRECURRING GIFTS NOT TO EXCEED \$30 PER INDIVIDUAL IN A QUARTER.	FOR PROSPECTIVE BUDGETING, IRREGULAR INCOME NOT TO EXCEED \$30 IN A QUARTER DISREGARDED. IRREGULAR INCOME COUNTED IN RETROSPECTIVE BUDGETING.	REVISE FOOD STAMP ACT TO DISREGARD UP TO \$30 PER PERSON PER QUARTER OF GIFTS AND INCONSEQUENTIAL INCOME IN EITHER PROSPECTIVE OR RETROSPECTIVE BUDGETING.	ACCEPTED RECOMMENDATION.	LAW	a	n/a	
40. INCOME: JTPA EARNINGS FROM STATE TRAINING PROGRAMS	AT STATE OPTION, MAY DISREGARD UNEARNED INCOME INDEFINITELY AND EARNED INCOME FOR 6 MONTHS OF A DEPENDENT CHILD PARTICIPATING IN JTPA.	EXCLUDES ALL JTPA INCOME EXCEPT THAT FROM ON-THE-JOB TRAINING PROGRAMS UNDER SECTION 204(5) OF TITLE II, JTPA. ALL OJT INCOME OF INDIVIDUALS UNDER 19 UNDER PARENTAL CONTROL EXCLUDED.	AMEND AFDC PROGRAM TO BE CONSISTENT WITH FSP AND EXCLUDE JTPA STATE TRAINING PROGRAM INCOME OF HOUSEHOLD MEMBERS UNDER 19.	ACCEPTED RECOMMENDATION.	LAW	n/a	a	
41. INCOME: LUMP SUM PAYMENTS	IF UNIT'S INCOME AFTER DISREGARDS EXCEEDS NEEDS STANDARD BECAUSE OF RECEIPT OF NONRECURRING EARNED OR UNEARNED LUMP SUM INCOME, UNIT IS INELIGIBLE FOR PERIOD DETERMINED BY DIVIDING LUMP SUM AMOUNT PLUS OTHER HOUSEHOLD INCOME BY NEEDS STANDARD.	ACT EXCLUDES FROM INCOME NONRECURRING LUMP-SUM PAYMENTS INCLUDING BUT NOT LIMITED TO INCOME TAX REFUNDS, REBATES OR CREDITS, RETROACTIVE LUMP-SUM SOCIAL SECURITY OR RAILROAD RETIREMENT PENSION PAYMENTS AND INSURANCE SETTLEMENTS.	AMEND SOCIAL SECURITY ACT TO ADOPT FSP POLICY. ADD PROVISIONS TO RULES OF BOTH PROGRAMS TO REQUIRE VERIFICATION OF THE DISPOSITION OF LUMP PAYMENTS IN EXCESS OF THE RESOURCE ELIGIBILITY MAXIMUMS.	ACCEPTED RECOMMENDATION.	LAW	\$-2 c	\$6	

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42. INCOME: SELF-EMPLOYMENT - CALCULATING BOARDER INCOME	ALLOWS USE OF A FLAT PERCENTAGE FOR EXPENSES IN CALCULATING INCOME FROM BOARDERS.	THE COST OF PRODUCING SELF-EMPLOYMENT BOARDER INCOME (OTHER THAN COMMERCIAL BOARDING HOUSES) IS THE GREATER OF THE MAXIMUM ALLOTMENT AMOUNT FOR THE BOARDER'S HOUSEHOLD SIZE OR THE ACTUAL COST OF PROVIDING ROOM AND BOARD.	AMEND AFDC PROGRAM TO CONFORM WITH FSP RULES AND ALLOW EITHER MAXIMUM ALLOTMENT FOR HOUSEHOLD OF THE SAME SIZE AS NUMBER OF BOARDERS OR THE ACTUAL DOCUMENTED COST, IF HIGHER THAN THE ALLOTMENT.	ACCEPTED RECOMMENDATION.	REG	n/a	a	WAIVER POSSIBLE FOR AFDC AND FSP. FSP SIMPLIFICATION RULE INCLUDES OPTION FOR PERCENTAGE FOR CHILD CARE PROVIDERS AND HOUSEHOLDS WITH BOARDERS.
43. INCOME: SELF-EMPLOYMENT EXPENSES	EXPENSES LIMITED TO THOSE WITHOUT WHICH GOODS OR SERVICES COULD NOT BE PRODUCED. DEPRECIATION, PURCHASES OF CAPITAL EQUIPMENT, PAYMENTS ON PRINCIPAL OF LOANS FOR CAPITAL ASSETS OR DURABLE GOODS, PERSONAL BUSINESS, TRANS., ENTERTAINMENT NOT ALLOWED.	EXPENSES NOT ALLOWED ARE: NET LOSSES FROM PRIOR PERIODS, DEPRECIATION, RETIREMENT MONEY, PURCHASE PRICE OR PAYMENTS ON PRINCIPAL OF LOANS FOR EQUIPMENT, PERSONAL INCOME TAXES AND OTHER WORK-RELATED EXPENSES COVERED BY EARNED INCOME DEDUCTION.	BOTH PROGRAMS SHOULD MODIFY REGULATIONS TO ALLOW SAME EXPENSES AND RECONSIDER TREATMENT OF DEPRECIATION. AMEND LAWS TO ALLOW STATES TO DEVELOP PERCENTAGE STANDARDS TO COVER THE COSTS OF DOING BUSINESS.	ACCEPTED RECOMMENDATION. NEED COMMON DEFINITIONS OF EXPENSES. WANT TO USE PERCENT, BUT NEED MORE INFORMATION TO DETERMINE WHAT THE PERCENT SHOULD BE.	REG	a	a	

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44. INCOME: STUDENT ASSISTANCE	EXCLUDES LOANS AND GRANTS OBTAINED AND USED UNDER CONDITIONS THAT PRECLUDE USE FOR CURRENT LIVING COSTS. EXCLUDES AID TO UNDERGRADUATES FROM EDUCATION DEPT. EXCLUDES COSTS OF ATTENDANCE FROM TITLE IV, BIA. STATE OPTION TO DISREGARD ALL STUDENT AID.	EXCLUDES AMOUNTS EARMARKED OR USED FOR COSTS OF ATTENDANCE, BUT COUNTS AS INCOME AMOUNTS MADE AVAILABLE FOR NORMAL LIVING COSTS.	LONG-TERM GOAL IS TO AMEND THE FOOD STAMP ACT TO TOTALLY DISREGARD ALL EDUCATIONAL ASSISTANCE. SHORT-TERM GOAL IS FOR FNS TO ALLOW STATES TO SEND A FORM TO SCHOOLS ASKING WHAT PORTION OF ASSISTANCE IS MADE AVAILABLE FOR ROOM AND BOARD.	ACCEPTED RECOMMENDATION.	LAW	\$5	n/a	LELAND BILL WOULD EXCLUDE EDUCATION ASSISTANCE.
45. INCOME: TITLE IV-D \$50 CHILD SUPPORT PASS-THROUGH PAYMENTS	DISREGARDS THE PASS-THROUGH PAYMENTS.	COUNTS PAYMENTS AS INCOME. STATES HAVE OPTION TO DISREGARD, BUT MUST PAY FNS FOR THE RESULTING ADDITIONAL BENEFITS ISSUED.	AMEND FOOD STAMP ACT TO DISREGARD THE \$50 PAYMENTS.	ACCEPTED RECOMMENDATION.	LAW	\$181	n/a	IN LELAND BILL.
46. RECERTIFICATION (REDETERMINATION): CERTIFICATION PERIODS	REDETERMINES ELIGIBILITY WHEN NECESSARY BUT AT LEAST ONCE EVERY 6 MONTHS UNLESS UNIT REPORTS MONTHLY OR IS COVERED BY APPROVED ERROR-PRONE PROFILING SYSTEM. MUST HAVE FACE-TO-FACE REDETERMINATION ONCE IN 12 MONTHS.	CERTIFICATION PERIODS OF FROM ONE TO TWELVE MONTHS ARE ASSIGNED TO NONMONTHLY REPORTING HOUSEHOLDS, DEPENDING ON HOUSEHOLD CHARACTERISTICS. MONTHLY REPORTING HOUSEHOLDS MUST BE CERTIFIED FOR SIX OR TWELVE MONTHS.	ALLOW OPEN-ENDED AUTHORIZATION OF BENEFITS FOR ALL HOUSEHOLDS. AT A MINIMUM, ALL CASES MUST BE REVIEWED EVERY 24 MONTHS.	ACCEPTED RECOMMENDATION.	LAW	b	b	

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47. RECERTIFICATION (REDETERMINATION): PROCESS	STATES MAY PRESCRIBE FORMS AND PROCEDURES.	LAW AND REGULATIONS CONTAIN SPECIFIC PROCEDURAL REQUIREMENTS FOR NOTICE OF EXPIRATION AND REAPPLICATION.	ALLOW STATE AGENCIES TO SET OWN REVIEW SCHEDULES.	ACCEPTED RECOMMENDATION.	LAW	a	a	FSP PROPOSED SIMPLIFICATION RULE WILL INCLUDE PROVISIONS ON RECERTIFICATION.
48. RESOURCES: ACCESSIBILITY	RESOURCES ARE CONSIDERED AVAILABLE WHEN ACTUALLY AVAILABLE AND WHEN THE CLIENT HAS A LEGAL INTEREST IN A LIQUIDATED SUM AND HAS THE LEGAL ABILITY TO MAKE IT AVAILABLE.	REGS EXCLUDE INACCESSIBLE RESOURCES SUCH AS THOSE IN IRREVOCABLE TRUSTS, PROBATE, SECURITY DEPOSITS, REAL PROPERTY BEING SOLD, JOINTLY HELD RESOURCES THAT CANNOT PRACTICALLY BE SUBDIVIDED AND THE OTHER OWNER REFUSES TO SELL.	COUNT THE VALUE OF PROPERTY SOLELY OWNED BY THE HOUSEHOLD/ASSISTANCE UNIT FOR BOTH PROGRAMS. EXCLUDE HEIR OR JOINTLY OWNED PROPERTY (OTHER THAN IF OWNED BY PERSONS IN THE BUDGET UNIT).	ACCEPTED RECOMMENDATION.	REG	a	a	
49. RESOURCES: BURIAL PLANS	EXCLUDES ONE BONA FIDE FUNERAL AGREEMENT PER INDIVIDUAL UP TO \$1,500 IN EQUITY VALUE OR LOWER AMOUNT AT STATE OPTION AND EXCLUDES ONE BURIAL PLOT PER INDIVIDUAL.	INACCESSIBLE FUNDS IN BURIAL AGREEMENTS AND ONE BURIAL PLOT PER MEMBER ARE EXCLUDED. ACCESSIBLE FUNDS ARE COUNTED.	EXCLUDE FOR BOTH PROGRAMS.	ACCEPTED RECOMMENDATION.	REG	a	a	PROVISION ON BURIAL PLANS IN FSP SIMPLIFICATION RULE.

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50. RESOURCES: INCOME-PRODUCING REAL PROPERTY	COUNTS AS A RESOURCE EXCEPT UNDER PROVISIONS GOVERNING REAL PROPERTY FOR SALE.	EXCLUDES AS A RESOURCE IF PRODUCING INCOME CONSISTENT WITH ITS FAIR MARKET VALUE OR ESSENTIAL TO SELF-EMPLOYMENT, BUT COUNTS INCOME PRODUCED.	EXCLUDE FOR BOTH PROGRAMS INCOME-PRODUCING PROPERTY ESSENTIAL TO EMPLOYMENT OR SELF-EMPLOYMENT. EXCLUDE FOR BOTH PROGRAMS THE EQUITY VALUE OF REAL PROPERTY (SOLE AND CLEAR OWNERSHIP) WHICH IS PRODUCING INCOME CONSISTENT WITH ITS FAIR MARKET VALUE.	ACCEPTED RECOMMENDATION.	LAW	n/a	a	
51. RESOURCES: LIFE INSURANCE	COUNTS AS A RESOURCE.	EXCLUDES AS A RESOURCE.	EXCLUDE FOR BOTH PROGRAMS.	ACCEPTED RECOMMENDATION.	LAW	n/a	a	
52. RESOURCES: REAL PROPERTY FOR SALE	RESOURCE AFTER 6 MONTHS (OR 9 AT STATE OPTION) IF NOT SOLD. CLIENT MUST AGREE TO MAKE A GOOD FAITH EFFORT TO DISPOSE OF PROPERTY AND REPAY AFDC RECEIVED DURING SALE PERIOD. IF NOT SOLD DURING PERIOD, AFDC ENDS. OVERPAYMENT CALCULATED WHEN PROPERTY SOLD.	EXCLUDES FOR UNSPECIFIED TIME IF HOUSEHOLD MAKING GOOD FAITH EFFORT TO SELL.	EXCLUDE FOR BOTH PROGRAMS REAL PROPERTY THE UNIT IS MAKING A GOOD FAITH EFFORT TO SELL.	ACCEPTED RECOMMENDATION.	LAW	n/a	a	

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53. RESOURCES: RESOURCE LIMIT	\$1,000 PER ASSISTANCE UNIT USING EQUITY VALUE OF RESOURCES.	\$2,000 PER HOUSEHOLD OR \$3,000 IF ONE MEMBER IS 60 OR OVER, USING EQUITY VALUE EXCEPT FOR VEHICLES. LIMIT DOES NOT APPLY TO CATEGORICALLY ELIGIBLE HOUSEHOLDS OR TO HOUSEHOLD MEMBERS WHO RECEIVE AFDC.	USE FOOD STAMP RESOURCE LIMITS.	ACCEPTED RECOMMENDATION.	LAW	b	b	
54. RESOURCES: TRANSFER	AFDC REGS CONTAIN NO PROVISION REGARDING INELIGIBILITY BECAUSE OF TRANSFER OF RESOURCES, BUT REGULATIONS ALLOW STATES TO IMPOSE ADDITIONAL CONDITIONS OF ELIGIBILITY. 35 STATES PROHIBIT TRANSFER OR OTHER DISPOSITION OF PROPERTY PRIOR TO APPLICATION.	PROHIBITS PARTICIPATION IN THE PROGRAM FOR UP TO ONE YEAR IF RESOURCE IS TRANSFERRED WITHIN 3 MONTHS PRIOR TO APPLICATION OR DURING CERTIFICATION PERIOD IN ORDER TO MEET FSP RESOURCE LIMITS.	STATES MAY CONFORM AFDC POLICY TO FSP POLICY.	ACCEPTED RECOMMENDATION.		n/a	a	

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55. RESOURCES: VEHICLES	EXCLUDES VEHICLES USED AS HOUSEHOLD HOME OR NEEDED TO PRODUCE INCOME. EXCLUDES FIRST \$1,500 OF EQUITY VALUE OF ONE VEHICLE AND COUNTS REMAINDER AS AVAILABLE RESOURCE.	EXCLUDES VEHICLES USED AS HOME, NEEDED TO PRODUCE INCOME OR TO TRANSPORT DISABLED MEMBER. COUNTS MARKET VALUE OVER \$4,500 OF 1 VEHICLE PER HOUSEHOLD AND EDUCATION AND WORK-RELATED VEHICLES. COUNTS GREATER OF FMV OVER \$4,500 OR EQUITY FOR OTHERS.	EXCLUDE ONE VEHICLE PER HOUSEHOLD REGARDLESS OF VALUE. COUNT FOR BOTH PROGRAMS THE EXCESS EQUITY (FAIR MARKET VALUE LESS ENCUMBRANCES) VALUE OF OTHER LICENSED VEHICLES.	ACCEPTED RECOMMENDATION.	LAW	\$280	\$736	INDEXING OF \$4500 FMV LIMIT IN LELAND BILL.
56. RESTORED BENEFITS (UNDERPAYMENTS): POLICY	UNDERPAYMENTS RESULTING FROM CLIENT OR AGENCY ERRORS ARE CORRECTED TO CURRENT RECIPIENTS AS LONG AS THE REPORTING REQUIREMENT FOR CHANGES IS SATISFIED. STATES MAY CORRECT UNDERPAYMENTS CAUSED BY CLIENT OR AGENCY ERROR TO FORMER RECIPIENTS.	LOST BENEFITS ARE RESTORED ONLY WHEN THE AGENCY MAKES A MISTAKE.	PAY RESTORED BENEFITS WHETHER DUE TO AGENCY OR CLIENT ERROR. CONTINUE TO ALLOW OFFSET OF RESTORED BENEFITS AGAINST OUTSTANDING CLAIMS. OFFSET POTENTIAL RESTORATIONS OLDER THAN ONE YEAR AGAINST OUTSTANDING CLAIMS.	DECIDED THAT BENEFITS SHOULD NOT BE RESTORED FOR CLIENT ERROR.	REG	\$2	\$-6	

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57. RESTORED BENEFITS (UNDERPAYMENTS): TIME LIMIT	NO TIME LIMIT FOR CORRECTION OF UNDERPAYMENTS. BENEFITS ARE RESTORED TO CURRENT RECIPIENTS BEGINNING WITH THE MONTH THAT CHANGES MUST BE REPORTED TO THE STATE AGENCY. CORRECTIVE PAYMENTS TO UNDERPAID FORMER RECIPIENTS ARE PERMITTED BUT NOT REQUIRED.	LOST BENEFITS CANNOT BE RESTORED FOR MORE THAN 12 MONTHS UNLESS THERE IS A SPECIAL EXCEPTION.	MODIFY AFDC LAW TO CONFORM WITH THE FOOD STAMP 12-MONTH LIMIT ON RESTORED BENEFITS, UNLESS REGULATIONS SPECIFY HOUSEHOLD IS ENTITLED TO LOST BENEFITS FOR A LONGER BENEFIT.	ACCEPTED RECOMMENDATION.	LAW	n/a	a	