

WELFARE Simplification

Welfare Reform 1993

Program Simplification

***Food Stamp Program
Aid to Families With Dependent Children***

June 1993

AFDC/FSP CONSISTENCY

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HISTORY OF EFFORTS TO INCREASE PROGRAM CONSISTENCY

o In **December of 1973** the staff of the **Joint Economic Committee**, chaired by Congresswoman Martha Griffiths, undertook an extensive study of the public assistance system. It resulted in 20 volumes addressing a variety of aspects of the system, including coordination issues.

o **The Allied Services Act** was a proposal put forth as legislation in **1974** and again in **1975**, but never enacted. The bill would have authorized demonstration grants to States and through States to localities, to develop "allied services plans" providing for the coordinated delivery of human services.

Special implementation grants would have been available to assist in covering the initial costs of consolidating administrative support services and management functions. The Act would have permitted States to transfer funds from one program to another for similar uses. Administrative and technical barriers between programs could have been waived by the Secretary of HEW when they impeded coordinated delivery of services.

o On **January 25, 1977**, **President Jimmy Carter** announced that Joseph Califano, his selection for Secretary of HEW would present him with a comprehensive plan to reform the public assistance system by May 1 of that year.

A 32-member consulting group consisting of representatives of the Congress, executive branch agencies, State and local government officials, public assistance recipients, and public interest organizations was appointed.

In his recommendations the Secretary wrote,

My basic recommendation...is that tinkering with the present system--trying to make incremental changes in the existing hodgepodge of income assistance programs--is not the proper course to follow. We must, instead, view the income assistance system as a whole and we must completely restructure the system so that it is comprehensive, fair, and efficient. Given the inequities and administrative chaos caused by a welter of inconsistent and confusing programs, nothing less than a total effort at welfare reform will do.

Guidelines for a legislative proposal included a consolidated cash assistance component that would encompass AFDC, Supplemental Security Income (SSI) benefits, and food stamps.

o In **December 1978**, **President Carter** called for an interagency effort to analyze and recommend improvements in the eligibility requirements and administrative procedures of Federal public assistance programs. The programs

under review included AFDC, SSI, food stamps, Medicaid, Title XX, Section 8 Housing, and Comprehensive Employment and Training Administration.

The Eligibility Simplification Project Steering Group was composed of assistant secretaries directed by the Secretary of HEW and the Director of the Office of Management and Budget.

In October 1980 a final version of the report was published which included recommendations for specific changes which would "reduce the conflicting and unnecessarily burdensome and duplicative eligibility requirements...." Because of the change in Administrations the next year, the recommendations were not championed and most were never adopted.

o State and local human service commissioners brought together by APWA completed work on their Matter of Commitment Project in 1986. The commissioners conducted a comprehensive review of public assistance programs to find ways to transform that system into a means of achieving self-sufficiency. Recommendations in the project's report, *One Child in Four*, emphasized the need to change assistance programs into vehicles for self-sufficiency for as many recipients as possible. Many of the principles in the report were reflected in the Family Support Act of 1988.

The Commissioners also recommended establishing a Family Living Standard (FLS), a nationally mandated, State-specific cash grant that would take the place of AFDC, food stamps, and Low-Income Home Energy Assistance Program payments. While the Family Support Act did not include the FLS, it did require a study of this and alternative benefit formulas by the National Academy of Sciences. This study is now in progress.

o In his 1986 State of the Union Address, President Ronald Reagan directed the White House Domestic Policy Council to study the public assistance system and to propose a strategy to change the system so that it would better serve the poor. In response to this charge, the Council's Low Income Opportunity Working Group made an extensive year-long study of public assistance and poverty in the Nation. The result of its work was a series of reports entitled *Up From Dependency: A New National Public Assistance Strategy*.

The group looked at public assistance as a recipient would, as a **system** rather than as a series of unconnected programs. It felt that the weaknesses that characterize a centralized system--rulemaking from the top down, failure to develop individual potential, and failure to utilize local resources--contribute to the persistence of poverty.

The cornerstone of the *Up From Dependency* recommendations is long-term experimentation through demonstrations that are both community-based and State-sponsored.

The Interagency Low Income Opportunity Advisory Board was formed by the White House in 1986 to enhance coordination of public assistance programs and policies across Departmental lines and create a focal point for intergovernmental coordination of public assistance initiatives.

- o On September 29, 1987, HHS and USDA published a proposed rule aimed at making the AFDC and Food Stamp Programs more consistent with each other. The rule was based to a large extent on comments received from the public in response to a Notice of Intent to Publish Rulemaking issued in 1985. In 1990, the Departments decided not to publish a final rule but instead to work on larger consistency efforts. FNS and ACF prepared Fact Sheets on 54 program differences and developed a database describing the legislative and regulatory requirements for each program.

- o In December 1990, Congress created the Welfare Simplification and Coordination Advisory Committee through the Mickey Leland Memorial Domestic Hunger Relief Act. The bipartisan Committee was charged with examining the policies and procedures of the Food Stamp, AFDC, medical assistance, and housing assistance programs to identify barriers to multiple program participation and elements of the system which make it difficult for administrators to provide timely benefits in an efficient manner.

The Committee's report, entitled *Time for a Change: Remaking the Nation's Welfare System*, was presented to Congress and the Administration on Monday, June 28, 1993. The Committee recommended that one comprehensive program replace the numerous programs that currently serve the needy. The Committee also recommended other steps that could be taken in the interim to improve the delivery of public assistance benefits.

- o When the National Commission on Employment Policy undertook a "coordination project" to review the interaction of public employment programs, it discovered that interaction was hampered by the lack of coordination of public assistance programs in general. The target of review was broadened, to encompass all needs-based programs.

In October 1991 the Commission sent its recommendations to the President and Congress. Recommendations to the President included:

- o direct the agencies that administer public assistance programs to develop a common framework for streamlining eligibility requirements,

formulating standard definitions, and easing administrative and documentation requirements; and

- o combine the many programs that provide employment and training services to the economically disadvantaged into one agency.

The Commission recommended that Congress:

- o assign responsibility for legislation and oversight over public assistance programs to a single Committee on Public Assistance in each Chamber;
 - o work with Executive Branch agencies to develop a common framework for streamlining eligibility requirements, formulating standard definitions and poverty measures, and easing administrative and documentation requirements;
 - o enact legislation to establish human resource councils at the State level to foster coordinated program approaches; and
 - o require that an economic, fiscal, and institutional analysis be conducted for each congressionally authored institutional reform or adjustment in Federal assistance programs.
- o In December 1991, APWA distributed the 54 Fact Sheets and an analysis of conformance costs to State agency representatives at the APWA meeting in Santa Fe. A task force which included ACF and FNS representatives was formed to research the issues and make recommendations to APWA's Economic Security Committee. Final APWA recommendations were submitted to the Welfare Simplification and Coordination Advisory Committee.
- o Currently, efforts to increase consistency continue through support provided to the APWA Coordination and Simplification Task Force. In addition, legislation to improve consistency is pending in Congress and regulations are in clearance which would eliminate or reduce several of the identified inconsistencies.

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COMPARISON OF AFDC AND FSP POLICIES
Method of Achieving Consistency:
(L) = Legislation (R) = Regulation
(O) = State Option (W) = Waiver

ISSUE	AFDC POLICY	FOOD STAMP POLICY
APPLICATION PROCESS: ALIEN/CITIZENSHIP DECLARATION	(L) EACH ADULT MUST ATTEST TO HIS/HER ALIEN OR CITIZENSHIP STATUS. ONE ADULT MAY SIGN FOR ALL CHILDREN.	(L) 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.
APPLICATION PROCESS: APPLICATION FORM	(L) 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.	(L) 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.
APPLICATION PROCESS: DELAY PROCEDURES	(R) NO CORRESPONDING REQUIREMENT.	(R) REGULATIONS PROVIDE DETAILED PROCEDURES AGENCY MUST FOLLOW IF HOUSEHOLD'S ELIGIBILITY IS NOT DETERMINED WITHIN 30 DAYS AFTER APPLICATION.
APPLICATION PROCESS: PROCESSING STANDARDS	(O) 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.	(L) 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.
APPLICATION PROCESS: SCHEDULING SECOND INTERVIEW	(R) CLIENT MUST BE NOTIFIED ORALLY AND IN WRITING OF RIGHTS AND RESPONSIBILITIES. THERE IS NO REQUIREMENT FOR THE AGENCY TO RESCHEDULE A MISSED INTERVIEW.	(W) REGULATIONS REQUIRE AGENCY TO RESCHEDULE INTERVIEW IF CLIENT DOES NOT APPEAR FOR THE ONE ORIGINALLY SCHEDULED.

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APPLICATION PROCESS: VERIFICATION	(O) 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.	(L) 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)
BUDGETING (PROSPECTIVE): BEST ESTIMATE/ANTICIPATING INCOME	(O) USES BEST ESTIMATE OF INCOME AND CIRCUMSTANCES BASED ON THE AGENCY'S REASONABLE EXPECTATION AND KNOWLEDGE OF CURRENT, PAST OR FUTURE CIRCUMSTANCES. INTERMITTENT INCOME MAY BE PRORATED.	(W) 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.
BUDGETING (RETROSPECTIVE): INCOME FROM A TERMINATED SOURCE	(R) 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.	(W) 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.
BUDGETING (RETROSPECTIVE): SUSPENSION	(R) IF INELIGIBILITY WILL BE FOR ONE MONTH ONLY, ASSISTANCE MAY BE SUSPENDED RETROSPECTIVELY IN THE PAYMENT MONTH BASED ON INCOME AND CIRCUMSTANCES IN THE BUDGET MONTH. UNIT MUST GENERALLY BE BUDGETED PROSPECTIVELY THE MONTH AFTER SUSPENSION.	(W) 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.

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BUDGETING: CONVERTING INCOME TO A MONTHLY AMOUNT	(O) 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.
BUDGETING: PRORATION OF CONTRACT AND SELF-EMPLOYMENT INCOME	(R) ALLOWS STATES TO AVERAGE OR PRORATE CONTRACT INCOME OVER THE PERIOD OF THE CONTRACT AND SELF-EMPLOYMENT INCOME OVER THE PERIOD THE INCOME COVERS.	(L) 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.
CHANGES: EFFECTIVE DATE	(L) CHANGE THAT RESULTS IN OVERPAYMENT OR UNDERPAYMENT IS EFFECTIVE IN THE MONTH OF THE CHANGE.	(R) EFFECTIVE DATE DEPENDS ON TIME FRAMES FOR REPORTING AND ACTING ON CHANGES.
CHANGES: MONTHLY REPORTING AND BUDGETING REQUIREMENTS	(W) MONTHLY REPORTING IS OPTIONAL. HOUSEHOLDS NOT REQUIRED TO REPORT MONTHLY MUST BE BUDGETED PROSPECTIVELY UNLESS WAIVER HAS BEEN GRANTED FOR CONSISTENCY WITH FSP.	(L) 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.
CHANGES: NOTICE OF ADVERSE ACTION	(R) ADVANCE NOTICE NOT REQUIRED WHEN, AMONG OTHER REASONS, MAIL IS RETURNED WITHOUT A FORWARDING ADDRESS.	(R) 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.
CHANGES: REPORTING REQUIREMENTS	(R) 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.	(L) 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.

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CHANGES: SUPPLEMENTAL BENEFITS FOR NEW MEMBERS	(R) NEW PERSON IS TREATED AS AN APPLICANT AND ADDED THE DATE HE/SHE ENTERED THE HOUSEHOLD OR DATE DETERMINED ELIGIBLE. SUPPLEMENTAL BENEFITS ARE ISSUED.	(W) 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.
DEDUCTIONS: DEPENDENT CARE	(L) FOR FULL TIME WORKERS: ACTUAL COSTS UP TO \$175 PER MONTH PER DEPENDENT CHILD 2 AND OVER OR INCAPACITATED ADULT LIVING IN SAME HOME AND RECEIVING AFDC AND UP TO \$200 PER MONTH PER CHILD UNDER 2. STATE MAY SET LESSER AMOUNT FOR PART-TIME WORKERS.	(L) 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.
DEDUCTIONS: EARNED INCOME DEDUCTION	(L) 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.	(L) DEDUCTS 20 PERCENT OF ALL EARNINGS.
DEDUCTIONS: EARNED INCOME DEDUCTION PENALTY	(L) \$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.	(L) WHEN CALCULATING OVERISSUANCE, EARNED INCOME DEDUCTION IS NOT ALLOWED ON PORTION OF EARNED INCOME HOUSEHOLD MEMBER WILLFULLY FAILED TO REPORT.

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ELIGIBILITY: ALIEN STATUS	(L) ALLOWS PARTICIPATION BY ALIENS ADMITTED FOR PERMANENT RESIDENCE OR PERMANENTLY RESIDING UNDER COLOR OF LAW.	(L) FOOD STAMP ACT LIMITS ALIEN PARTICIPATION TO THOSE ADMITTED UNDER SPECIFIED SECTIONS OF THE INA.
ELIGIBILITY: CERTIFIED UNIT	(L) 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.	(L) 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.
ELIGIBILITY: CHILD SUPPORT ASSIGNMENT AND COOPERATION	(L) 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.	(L) NO COMPARABLE PROVISION.
ELIGIBILITY: POTENTIAL SOURCES OF INCOME	(R) 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.	(L) THERE IS NO REQUIREMENT THAT APPLICANTS OR RECIPIENTS APPLY FOR OTHER ASSISTANCE AS A CONDITION OF ELIGIBILITY.
ELIGIBILITY: RESIDENCY REQUIREMENT	(R) ASSISTANCE UNIT MUST RESIDE IN THE STATE, BUT THERE IS NO DURATIONAL REQUIREMENT.	(R) HOUSEHOLD MUST RESIDE IN THE PROJECT AREA IN WHICH IT APPLIES, BUT THERE IS NO DURATIONAL REQUIREMENT.

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ELIGIBILITY: SOCIAL SECURITY NUMBERS	(R) APPLICANT MUST PROVIDE SSN OR APPLY FOR ONE.	(R) APPLICANT MUST PROVIDE NUMBER OR APPLY FOR ONE, BUT GOOD CAUSE ALLOWED FOR FAILURE TO APPLY.
ELIGIBILITY: STRIKER DEFINITION	(L) 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 STRIKE LAST DAY OF THE MONTH.	(L) 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.
ELIGIBILITY: STUDENTS	(L) NO RESTRICTIONS ON STUDENT ELIGIBILITY IN ADDITION TO THOSE FOR OTHER INDIVIDUALS.	(L) STUDENTS MUST MEET SPECIFIC ELIGIBILITY CRITERIA IN ADDITION TO THOSE WHICH APPLY TO OTHER INDIVIDUALS.
INCOME: COMPLEMENTARY PROGRAMS	(O) PERMITS STATES TO DISREGARD THE VALUE OF ASSISTANCE PAYMENTS THAT ARE COMPLEMENTARY AND NOT DUPLICATIVE.	(L) WITH SPECIFIED EXCEPTIONS, GENERALLY COUNTS STATE-FUNDED ASSISTANCE WHETHER PAID DIRECTLY OR VENDORRED.
INCOME: EARNINGS OF 18-YEAR-OLD HIGH SCHOOL STUDENTS	(L) 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.	(L) COUNTS AS EARNED INCOME.
INCOME: EARNINGS OF STUDENTS UNDER 18	(L) 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.	(L) EXCLUDES IF STUDENT IS IN SCHOOL AT LEAST HALF TIME AND UNDER PARENTAL CONTROL.

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INCOME: ENERGY ASSISTANCE	(L) EXCLUDES ASSISTANCE PROVIDED UNDER LOW-INCOME HOME ENERGY ASSISTANCE ACT. STATES HAVE OPTION TO EXCLUDE ASSISTANCE FROM OTHER SPECIFIED TYPES OF PROVIDERS.	(L) 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.
INCOME: HUD UTILITY PAYMENTS	(L) 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.	(L) 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.
INCOME: IN-KIND INCOME/VENDOR PAYMENTS	(L) 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.	(L) 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.
INCOME: INCOME EXCLUDED BY OTHER LAWS	(L) EXCLUSIONS FOR EDUCATION ASSISTANCE, INDIAN PER CAPITA PAYMENTS, JTPA, AND OTHERS REQUIRED BY LAW DIFFER FROM FOOD STAMP EXCLUSIONS.	(L) EXCLUSIONS FOR EDUCATION ASSISTANCE, INDIAN PER CAPITA PAYMENTS, JTPA, AND OTHERS REQUIRED BY LAW DIFFER FROM THE AFDC EXCLUSIONS.
INCOME: INCOME OF INELIGIBLE (DISQUALIFIED) MEMBERS	(L) 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.	(L) TREATMENT OF INCOME OF INELIGIBLE MEMBER DEPENDS ON THE REASON FOR INELIGIBILITY.

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INCOME: IRREGULAR INCOME	(R) STATE OPTION TO DISREGARD SMALL NONRECURRING GIFTS NOT TO EXCEED \$30 PER INDIVIDUAL IN A QUARTER.	(L) FOR PROSPECTIVE BUDGETING, IRREGULAR INCOME NOT TO EXCEED \$30 IN A QUARTER DISREGARDED. IRREGULAR INCOME COUNTED IN RETROSPECTIVE BUDGETING.
INCOME: JTPA EARNINGS FROM STATE TRAINING PROGRAMS	(L) AT STATE OPTION, MAY DISREGARD UNEARNED INCOME INDEFINITELY AND EARNED INCOME FOR 6 MONTHS OF A DEPENDENT CHILD PARTICIPATING IN JTPA.	(L) 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.
INCOME: LUMP SUM PAYMENTS	(L) 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.	(L) 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.
INCOME: SELF-EMPLOYMENT - CALCULATING BOARDER INCOME	(R) ALLOWS USE OF A FLAT PERCENTAGE FOR EXPENSES IN CALCULATING INCOME FROM BOARDERS.	(R) 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.
INCOME: SELF-EMPLOYMENT EXPENSES	(R) 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.	(R) 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.

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ISSUE	AFDC POLICY	FOOD STAMP POLICY
INCOME: STUDENT ASSISTANCE	(L) 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.	(L) EXCLUDES AMOUNTS EARMARKED OR USED FOR COSTS OF ATTENDANCE, BUT COUNTS AS INCOME AMOUNTS MADE AVAILABLE FOR NORMAL LIVING COSTS.
INCOME: TITLE IV-D \$50 CHILD SUPPORT PASS-THROUGH PAYMENTS	(L) DISREGARDS THE PASS-THROUGH PAYMENTS.	(L) COUNTS PAYMENTS AS INCOME. STATES HAVE OPTION TO DISREGARD, BUT MUST PAY FNS FOR THE RESULTING ADDITIONAL BENEFITS ISSUED.
RECERTIFICATION (REDETERMINATION): CERTIFICATION PERIODS	(O) 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.	(L) 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.
RECERTIFICATION (REDETERMINATION): PROCESS	(O) STATES MAY PRESCRIBE FORMS AND PROCEDURES.	(L) LAW AND REGULATIONS CONTAIN SPECIFIC PROCEDURAL REQUIREMENTS FOR NOTICE OF EXPIRATION AND REAPPLICATION.
RESOURCES: ACCESSIBILITY	(R) 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.	(R) 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.

COMPARISON OF AFDC AND FSP POLICIES
Method of Achieving Consistency:
(L) = Legislation (R) = Regulation
(O) = State Option (W) = Waiver

ISSUE	AFDC POLICY	FOOD STAMP POLICY
RESOURCES: BURIAL PLANS	(L) EXCLUDES ONE FUNERAL AGREEMENT PER INDIVIDUAL UP TO \$1,500 IN EQUITY VALUE OR LOWER AMOUNT AT STATE OPTION.	(L) INACCESSIBLE FUNDS IN BURIAL AGREEMENTS AND ONE BURIAL PLOT PER MEMBER ARE EXCLUDED. ACCESSIBLE FUNDS ARE COUNTED.
RESOURCES: INCOME-PRODUCING REAL PROPERTY	(L) COUNTS AS A RESOURCE EXCEPT UNDER PROVISIONS GOVERNING REAL PROPERTY FOR SALE.	(L) EXCLUDES AS A RESOURCE IF PRODUCING INCOME CONSISTENT WITH ITS FAIR MARKET VALUE OR ESSENTIAL TO SELF-EMPLOYMENT, BUT COUNTS INCOME PRODUCED.
RESOURCES: LIFE INSURANCE	(L) COUNTS AS A RESOURCE.	(L) EXCLUDES AS A RESOURCE.
RESOURCES: REAL PROPERTY FOR SALE	(L) 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.	(L) EXCLUDES FOR UNSPECIFIED TIME IF HOUSEHOLD MAKING GOOD FAITH EFFORT TO SELL.
RESOURCES: RESOURCE LIMIT	(L) \$1,000 PER ASSISTANCE UNIT USING EQUITY VALUE OF RESOURCES.	(L) \$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.
RESOURCES: TRANSFER	(L) 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.	(L) 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.

COMPARISON OF AFDC AND FSP POLICIES
Method of Achieving Consistency:
(L) = Legislation (R) = Regulation
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ISSUE	AFDC POLICY	FOOD STAMP POLICY
RESOURCES: VEHICLES	(L) 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.	(L) 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.
RESTORED BENEFITS (UNDERPAYMENTS): POLICY	(L) UNDERPAYMENTS ARE CORRECTED TO CURRENT AND FORMER RECIPIENTS WHO WOULD BE PARTICIPANTS EXCEPT FOR THE ERROR WHENEVER A LOSS OCCURS BECAUSE OF EITHER CLIENT OR AGENCY ERROR. STATES MAY CORRECT UNDERPAYMENTS TO ALL FORMER RECIPIENTS.	(L) LOST BENEFITS ARE RESTORED ONLY WHEN THE AGENCY MAKES A MISTAKE.
RESTORED BENEFITS (UNDERPAYMENTS): TIME LIMIT	(L) THERE IS NO TIME LIMIT FOR CORRECTION OF UNDERPAYMENTS. BENEFITS ARE RESTORED TO CURRENT RECIPIENTS OR FORMER RECIPIENTS WHO WOULD BE RECIPIENTS EXCEPT FOR THE ERROR. CORRECTIVE PAYMENTS TO ALL FORMER RECIPIENTS PERMITTED BUT NOT REQUIRED.	(L) LOST BENEFITS CANNOT BE RESTORED FOR MORE THAN 12 MONTHS UNLESS THERE IS A SPECIAL EXCEPTION.

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3

Divider Title: _____

June 29, 1993

**COST ESTIMATES
AFDC - FOOD STAMP CONFORMITY ISSUES**

(Fiscal Year 1994 dollars in millions)

Proposal	Cost of Conforming FSP to AFDC
Application Process:	
Alien/citizenship declaration	a
Application form	a
Delay procedures	a
Processing standards	-\$390
Requirement to schedule second interview	a
Verification	a
BUDGETING:	
Best estimate/anticipating income	a
Income from a terminated source	a
Suspension	a
Converting income to a monthly amount	0
Proration of contract and self-employment income	a
CHANGES:	
Effective date of changes	\$20
Monthly reporting and budgeting requirements	a
Notice of adverse action	a
Reporting requirements	a
Supplemental benefits for new members	\$7
DEDUCTIONS:	
Dependent care	-\$5
Earned income deduction	\$486

Proposal	Cost of Conforming FSP to AFDC
Earned income deduction penalty	-\$1
ELIGIBILITY:	
Alien status	a
Certified unit	\$614
Child support assignment and cooperation	-\$30
Potential sources of income	-\$449
Residency requirements	a
Social security numbers	a
Striker definition	-\$1
Students eligibility	\$77
INCOME:	
Complementary programs	a
Earnings of 18-year-old high school students	\$8
Earnings of students under 18	a
Energy assistance	b
HUD utility payments	\$160
In-kind income/vendor payments	-\$6
Income excluded by other laws	b
Irregular income	a
JTPA earnings from State training programs	a
Lump sum payments	\$158
Self-employment - calculating boarder income	a
Self-employment expenses	a
Student educational assistance	\$5
Title IV-D, \$50 disregard	\$100
Treatment of income of ineligible members	a

Proposal	Cost of Conforming FSP to AFDC
RECERTIFICATION:	
Certification periods	a
Recertification process	a
RESOURCES:	
Resource accessibility	a
Burial plans	a
Income-producing real property	a
Licensed vehicles	-\$85
Cash surrender value of life insurance	-\$14
Real property for sale	a
Resource limit	-\$266
Transfer of resources	a
RESTORED BENEFITS:	
Policy regarding restored benefits/under payments	\$30
Time limit for restoring benefits	a

Costs based on January 27, 1993 economic assumptions.

a Minimal budgetary impact anticipated

b Cost/savings not estimated

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Divider Title: _____

Conformity Provisions of Pending Legislation and Regulations

The following provisions that would enhance conformity between the Food Stamp and Aid to Families with Dependent Children Programs are included in the Department's Mickey Leland Hunger Prevention Act and H.R. 2264, the House-passed Omnibus Budget Reconciliation Act of 1993:

- o Excluding educational income
- o Excluding child support payments received
- o Increasing the dependent care deduction cap to \$200 per month for children under 2 years old and \$175 a month for other dependents
- o Assuring that State agencies will be reimbursed under the food stamp employment and training programs for the same work-related, non-dependent care costs that they are under the JOBS program
- o Testing the effects of excluding up to \$10,000 in resources if they are being accumulated in separate accounts for specific goals related to self sufficiency (improving education, training, or employability of household members; buying a house for the household's use; changing the household's residence; or making major household repairs)
NOTE: This proposal is included because the increased resource limit to be tested for the FSP would correspond to the proposal in S. 586, the Microenterprise and Asset Development Act, to raise the AFDC resource limit to \$10,000 under similar circumstances.

A provision in the Reconciliation Bill would conform the AFDC alien declaration requirements to the food stamp provision.

Draft proposed regulations addressing the following program differences are now in clearance: anticipating income, retrospective suspension, notice of adverse action, reporting requirements, supplemental benefits for new members, residency, calculating self-employment income, recertification procedures, and burial plans.

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Divider Title: _____

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)	CURRENT STATUS
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.

APWA TASK FORCE ON PROGRAM COORDINATION
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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
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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ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
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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ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
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 (PROSPECTIVE): INC 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 BECA 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 RET 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 CI 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 TO REPORT. 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	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 US 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 B 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 THERE IS NO REQUIREMENT CARRY OUT POLICIES WITH REFERENCE TO APPLICANTS' AND RECIPIENTS' POTENTIAL SOURCES OF INCOME THAT CAN BE DEVELOPED TO A STATE OF AVAILABILITY.	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 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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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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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: INELIGIBLE (DISQUALIFIED) MEMBERS	INCOME OF 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	
39. INCOME: INCOME	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 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	

APWA TASK FORCE ON PROGRAM COORDINATION
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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)	CURRENT STATUS
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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ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
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)	CURRENT STATUS
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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ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
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	d	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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ISSUE	AFDC POLICY	FOOD STAMP POLICY	TASK FORCE RECOMMENDATION	ECONOMIC SECURITY COMMITTEE ACTION	CHANGE REQUIRED	FSP COST \$(M)	AFDC COST \$(M)	CURRENT STATUS
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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Divider Title: _____

Comparison of Certification Policies

Aid to Families with Dependent Children

Food Stamp Program

**Prepared by USDA/FNS
January 1992**

AFDC AND FSP CONSISTENCY
COMPARISON OF CERTIFICATION POLICIES

APPLICATION PROCESS: ALIEN/CITIZENSHIP DECLARATION
APPLICATION PROCESS: APPLICATION FORM
APPLICATION PROCESS: DELAY PROCEDURES
APPLICATION PROCESS: PROCESSING STANDARDS
APPLICATION PROCESS: SCHEDULING SECOND INTERVIEW
APPLICATION PROCESS: VERIFICATION
BUDGETING (PROSPECTIVE): BEST ESTIMATE/ANTICIPATING INCOME
BUDGETING (RETROSPECTIVE): INCOME FROM A TERMINATED SOURCE
BUDGETING (RETROSPECTIVE): SUSPENSION
BUDGETING: CONVERTING INCOME TO A MONTHLY AMOUNT
BUDGETING: PRORATION OF CONTRACT AND SELF-EMPLOYMENT INCOME
CHANGES: EFFECTIVE DATE
CHANGES: MONTHLY REPORTING AND BUDGETING REQUIREMENTS
CHANGES: NOTICE OF ADVERSE ACTION
CHANGES: REPORTING REQUIREMENTS
CHANGES: SUPPLEMENTAL BENEFITS FOR NEW MEMBERS
DEDUCTIONS: DEPENDENT CARE
DEDUCTIONS: EARNED INCOME DEDUCTION
DEDUCTIONS: EARNED INCOME DEDUCTION PENALTY
ELIGIBILITY: ALIEN STATUS
ELIGIBILITY: CERTIFIED UNIT
ELIGIBILITY: CHILD SUPPORT ASSIGNMENT AND COOPERATION
ELIGIBILITY: POTENTIAL SOURCES OF INCOME
ELIGIBILITY: RESIDENCY REQUIREMENT
ELIGIBILITY: SOCIAL SECURITY NUMBERS
ELIGIBILITY: STRIKER DEFINITION
ELIGIBILITY: STUDENTS
INCOME: COMPLEMENTARY PROGRAMS
INCOME: EARNINGS OF 18-YEAR-OLD HIGH SCHOOL STUDENTS
INCOME: EARNINGS OF STUDENTS UNDER 18
INCOME: ENERGY ASSISTANCE
INCOME: HUD UTILITY PAYMENTS
INCOME: IN-KIND INCOME/VENDOR PAYMENTS
INCOME: INCOME EXCLUDED BY OTHER LAWS
INCOME: INCOME OF INELIGIBLE (DISQUALIFIED) MEMBERS
INCOME: IRREGULAR INCOME
INCOME: JTPA EARNINGS FROM STATE TRAINING PROGRAMS
INCOME: LUMP SUM PAYMENTS
INCOME: SELF-EMPLOYMENT - CALCULATING BOARDER INCOME
INCOME: SELF-EMPLOYMENT EXPENSES
INCOME: STUDENT ASSISTANCE
INCOME: TITLE IV-D \$50 CHILD SUPPORT PASS-THROUGH PAYMENTS
RECERTIFICATION (REDETERMINATION): CERTIFICATION PERIODS
RECERTIFICATION (REDETERMINATION): PROCESS
RESOURCES: ACCESSIBILITY
RESOURCES: BURIAL PLANS
RESOURCES: INCOME-PRODUCING REAL PROPERTY
RESOURCES: LIFE INSURANCE
RESOURCES: REAL PROPERTY FOR SALE
RESOURCES: RESOURCE LIMIT
RESOURCES: TRANSFER
RESOURCES: VEHICLES
RESTORED BENEFITS (UNDERPAYMENTS): POLICY
RESTORED BENEFITS (UNDERPAYMENTS): TIME LIMIT

CONFORMANCE ISSUE: APPLICATION PROCESSING - ALIEN/CITIZENSHIP
DECLARATION

FOOD STAMP PROGRAM PROVISIONS

Section 121 of the Immigration Reform and Control Act (P.L. 99-603) requires that as a condition of eligibility each individual applying for food stamps must declare in writing, under penalty of perjury, that he or she is a citizen or national of the U.S. or an alien in satisfactory immigration status. If the individual is a child, another person must make the declaration on the child's behalf. A provision of Public Law 101-624, the Mickey Leland Memorial Domestic Hunger Relief Act, enacted November 28, 1990, supersedes this requirement. The Leland Act amended section 11(e)(2) of the Food Stamp Act to provide that one adult household member shall certify in writing, under penalty of perjury, that the information contained in the application is true and that all members of the household are either citizens or are aliens eligible to receive food stamps under the Food Stamp Act. The legislation specifies that the signature of the adult shall be deemed sufficient to comply with any provision of federal law requiring household members to sign the application or statements in connection with the application process. Regulations implementing this change were published March 28, 1991 and are effective August 1, 1991.

Section 273.2(b)(1)(ii) of the food stamp regulations has been amended to provide that one adult household member may sign the application attesting, under penalty of perjury, to the truth of all information in the application, including information about the alien or citizenship status of household members.

AFDC PROVISIONS

The requirement of the Immigration Reform and Control Act that assistance unit members attest to their citizenship or alien status has been implemented by policy instructions to State agencies. AFDC requires each adult assistance unit member to attest to his or her citizenship or alien status upon application. An adult can sign a general statement encompassing all minor children, rather than signing for each child individually.

SUMMARY

In food stamps, one adult may certify for all household members that information regarding their alien or citizenship status on the food stamp application is true. In AFDC, each adult member must attest to his or her alien or citizenship status.

CONFORMANCE ISSUE: APPLICATION PROCESS - APPLICATION FORM
FOOD STAMP PROGRAM PROVISIONS

Section 11(e)(2) of the Food Stamp Act contains detailed requirements for the content and format of the food stamp application. State agencies must use a simplified, uniform national application designed by FNS. Forms which deviate from the national form may be approved for use by FNS if necessary because of joint processing or computer requirements or other reasons. However, the form must be easy to use, brief and readable. The Food Stamp Act, as amended by the Mickey Leland Memorial Domestic Hunger Relief Act (Public Law 101-624), enacted November 28, 1990, requires that the following information be provided on or near the front cover of the application:

1. Instructions in understandable terms informing households of their right to file an incomplete application,
2. A description of the expedited processing requirements, and
3. A statement that benefits are provided from the date of application.

In addition, the form must:

1. Contain on the front page a place for the applicant's name, address and signature;
2. Describe in understandable terms in prominent and boldface letters the appropriate civil and criminal provisions of the Act, including the penalties;
3. Include in understandable terms and in boldface type a statement that information provided by the applicant will be subject to verification by Federal, State and local officials to determine if it is factual and that if any material part is incorrect, food stamps may be denied and the applicant may be subject to criminal prosecution; and
4. Include space for the signature of one adult household member attesting, under penalty of perjury, that the information in the application is true and that all members of the household are either citizens or are aliens eligible to receive food stamps.

The law also requires the Secretary of Agriculture, in consultation with the Secretary of Health and Human Services, to assist States, upon request, in the development of brief, simply-written and readable application forms, including forms that cover food stamps, AFDC and Medicaid.

Section 273.2(b) of the Food Stamp Program regulations contains the application form requirements of the law. Proposed regulations have been written to implement the provisions of the Leland Act concerning the location of information on the application. The regulations also require that the application must inform applicants that their alien status may be verified with the Immigration and Naturalization Service (INS) and that the information received from INS may affect their eligibility or benefits. All applicants must also be notified on the application or a separate form that income and resources will be verified through the Income and Eligibility Verification System, that discrepant information may be verified with collateral contacts and that eligibility or benefits may be affected.

AFDC PROVISIONS

Section 206.10(a)(1)(ii) of the AFDC regulations authorizes State agencies to design application forms. Applicants or their authorized representatives must sign the form under penalty of perjury. If the applicant is incompetent or incapacitated, someone acting responsibly may sign for the individual. In addition, Section 206.10(a)(2)(ii) requires all applicants for and recipients of assistance to be notified in writing at the time of application and on redetermination that eligibility and income information will be regularly requested from agencies specified in the income and eligibility verification system and will be used to aid in determining their eligibility for assistance.

The requirement of the Immigration Reform and Control Act that assistance unit members attest to their citizenship or alien status has been implemented by policy instructions to State agencies.

SUMMARY:

The Food Stamp Act and FSP regulations mandate specific items which State agencies must include on an application for food stamps. AFDC authorizes State agencies to design their own forms.

CONFORMANCE ISSUE: APPLICATION PROCESSING DELAY PROCEDURES

FOOD STAMP PROGRAM PROVISIONS

Section 11(e)(6) of the Food Stamp Act authorizes the Secretary to issue regulations prescribing general procedures for States to follow in certifying households.

Section 273.2(h) of the regulations provides detailed instructions concerning actions the agency must take when the application process is not complete at the end of 30 or 60 days after the date of application.

Delays caused by the household: If the State agency has not determined an applicant household's eligibility or ineligibility by the 30th day after the application was filed, the State agency must determine the cause of the delay. If the delay was caused by the household, the household loses its right to benefits for the month of application. However, the agency must have taken certain actions before a delay can be considered the household's fault.

If verification is incomplete, the State agency must have provided the household with a statement of required verification and offered to assist the household in obtaining the verification and allowed the household at least 10 days from the date of the initial request to provide the missing verification. If the household has failed to complete the application form, the State agency must have offered, or attempted to offer, to help the applicant complete the application. If one or more members of the household have failed to register for work, the State agency must have informed the household of the need to register for work and must have given the household at least 10 days from the date of notification to meet the registration requirement.

If the household has failed to appear for an interview, the State agency must have attempted to reschedule the initial interview within 30 days following the date the application was filed. However, if the household failed to appear for the first interview and a subsequent interview is postponed at the household's request or cannot otherwise be rescheduled until after the 20th day but before the 30th day following the date the application was filed, the household must appear for the interview, bring verification, and register members for work by the 30th day; otherwise, the delay shall be the fault of the household. If the household has failed to appear for the first interview and a subsequent interview is postponed at the household's request until after the 30th day following the date the application was filed, the delay shall be the fault of the household. If the household has missed both scheduled interviews, the delay is the household's fault.

If the delay is the household's fault, the State agency shall

give the household an additional 30 days to take the required action. If verification is missing, the State agency has the option of holding the application pending for only 30 days following the date of the initial request for the verification.

On the 30th day, the State agency has the option of sending the household a notice of denial or a notice of pending status. If a notice of denial is sent and the household takes the required action within 60 days following the date of application, the State agency shall reopen the case without requiring a new application. If the household takes no action in response to the notice of denial or notice of pending status, no further action is required by the agency. If the household was at fault for the delay in the first 30-day period, but is found to be eligible during the second 30-day period, the State agency shall provide benefits only from the month following the month of application.

If the household is at fault for not completing the application process by the end of the second 30-day period, the State agency shall deny the application and require the household to file a new one if it wishes to participate. The household shall not be entitled to any lost benefits, even if the delay in the initial 30 days was the fault of the State agency.

Delays caused by the State agency: If the State agency caused the delay in the initial 30-day period, it shall not deny the application but shall instead notify the household by the 30th day that its application is being held pending. The State agency must also notify the household of any action it must take to complete the application process.

If the household is found to be eligible during the second 30-day period, the household is entitled to benefits retroactive to the date of application.

If the State agency is at fault for not completing the application process by the end of the second 30-day period, and the case file is otherwise complete, the State agency shall continue to process the original application. If the household is determined eligible, and the State agency was at fault for the delay in the initial 30 days, the household is entitled to benefits from the date of application. The State agency may use the household's original application to determine eligibility in the months following the 60-day period, or it may require a new application.

If the State agency is at fault for not completing the application by the end of the second 30-day period, but the case file is not complete enough to reach an eligibility determination, the State agency may continue to process the original application or may deny the case and require a new

application. If the case is denied, the household shall be informed of its possible entitlement to lost benefits. If the State agency was also at fault for the delay in the initial 30 days, the amount of benefits lost would be calculated from the month of application. If the household was at fault for the initial delay, the amount of benefits lost would be calculated from the month following the month of application.

AFDC PROVISIONS

There are no requirements in the AFDC regulations concerning actions to be taken if application processing is delayed.

SUMMARY

In food stamps, there are detailed procedures for handling applications that have not been completely processed by the end of 30 or 60 days after application. In AFDC, there are no comparable regulatory provisions.