

OREGON SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM (SNAP) AND THE PROPOSED RULE TO REVISE CATEGORICAL ELIGIBILITY (2019).

The Federal Food and Nutrition Service (FNS) is proposing changes to Broad-Based Categorical Eligibility (BBCE) for the Supplemental Nutrition Assistance Program (SNAP). The proposed rule is now open to public comment and this period will close on September 23, 2019. After comments are received, FNS will review the comments and make a decision about enacting the final rule. The rule is not currently in place.

Potential Impacts

The proposed changes will have more far reaching impacts than solely cases with income limits above 130%. The numbers provided below reflect the Oregon Self-Sufficiency Program SNAP caseload as of the end of June 2019. These data sets have been built to demonstrate what the impact of enacting this rule would be to current program recipients but cannot fully reflect the full impact to SNAP recipients.

Table 1 - SNAP Households and Participants (June 2019)

In June 2019, approximately 31,992 Oregon SNAP households had countable income over 130% FPL. These households would need to meet new categorical eligibility requirements in order to continue to receive SNAP benefits.

- According to FNS data provided in the proposed rule 4.9% of the entire caseload of 347,365 will exceed resource limits and lose eligibility.
- Exceeding resource limits could potentially cause 17,021 more households to lose SNAP eligibility at their next recertification.
- The combined impact if the proposed rule were enacted could be nearly 50,000 households would lose SNAP benefits

% FPL	SNAP Households	SNAP Participants	% of caseload	Ave. Monthly Benefit
0-99%	269,704	446,722	78%	\$237.16
100 - 129%	45,670	86,693	13%	\$124.09
130% or greater	31,992	58,922	10%	\$120.52
Total	347,365	592,337	100%	\$211.42

Table 2 – SNAP cases receiving TANF (June 2019)

Households receiving TANF benefits will continue to be categorically eligible. A household will be considered categorical eligibility if at least one individual is receiving benefits from a conferring program. The term “conferring program” means that the SNAP applicant can meet a higher income limit with no resource test because they receive or are authorized to receive non-cash TANF/Maintenance of Effort (MOE) funded benefits or services (for example, Oregon uses TANF MOE funds towards the Earned Income Tax Credit).

This table below shows that there are 12 SNAP households above 130% FPL that will remain categorically eligible because at least one member of the filing group receives TANF cash benefits.

% FPL	TANF	% of TANF
0 - 99%	11,999	99.5%
100 -129%	48	0.4%
130% or greater	12	0.1%
Total	12,059	100.00%

Table 3 – SNAP cases receiving ERDC

Childcare is one of the three core services that may “confer” Categorical Eligibility. In June 2019, about 1,685 families would remain categorically eligible because they receive assistance paying for childcare.

% FPL	ERDC Cases	% of ERDC Cases	Children	% of ERDC Recipients
0 - 99%	3,170	48.49%	6,210	50.31%
100 - 129%	1,683	25.74%	3,287	26.63%
130% or greater	1,685	25.77%	2,847	23.06%
Total	6,538	100.00%	12,344	100.00%

Note: Above cases only include children under 12

Table 4 – SNAP cases receiving SSI

Categorical Eligibility is also conferred when an individual is receiving SSI. In June 2019, SSI was part of the countable income putting 7,869 household’s above 130% FPL. These households would not be subject to resource limits and will continue to meet the higher 185% FPL income limit.

%FPL Category	SSI	% of SSI	% of SNAP
0 - 99% FPL	80,923	78.03%	23.30%
100 -129% FPL	14,922	14.39%	4.30%
130 - 184% FPL	7,522	7.25%	2.17%
185%+ FPL	347	0.33%	0.10%
Total Cases	103,714	100.00%	29.86%

The economic impact on local resources will vary in communities throughout Oregon if the BBCE change goes into effect.

- Large urban communities will see more of an impact of households losing SNAP eligibility. The need for those families to access resources such as food banks or agencies providing housing and energy assistance may increase.
- SNAP benefits are an important part of a family’s budget allowing them to be able to pay for other basic needs.
- In rural areas small community stores account for the majority of EBT redemptions.
- 80% of families receiving ERDC also receive SNAP benefits. The loss of SNAP benefits or reduction in SNAP benefits will impact ERDC families ability to financially cover their monthly child care copayment.
- In Oregon, for the month of June, there were a total of 131,609 school age children receiving SNAP that could receive free or reduced school lunches based on their SNAP participation.

Table 5 – SNAP participants categorized by age groups within counties (June 2019)

County	0 to 5	6 to 17	18 to 49	50 to 59	60+	Grand Total
Baker	325	657	1,263	424	577	3,246
Benton	794	1,524	3,388	732	1,091	7,529
Clackamas	3,726	7,546	14,095	3,929	6,402	35,698
Clatsop	547	1,037	2,222	767	1,335	5,908
Columbia	679	1,370	2,846	1,034	1,293	7,222
Coos	1,238	2,406	5,688	1,982	2,957	14,271
Crook	486	811	1,702	497	793	4,289
Curry	318	649	1,385	591	1,224	4,167
Deschutes	2,033	4,129	8,245	2,255	3,395	20,057
Douglas	2,252	4,290	9,616	2,941	4,153	23,252
Gilliam	23	51	98	25	65	262
Grant	123	237	492	145	234	1,231
Harney	128	224	486	177	280	1,295
Hood River	280	698	853	229	352	2,412
Jackson	4,296	8,202	16,180	4,230	6,511	39,419
Jefferson	775	1,493	2,650	555	780	6,253
Josephine	1,890	3,657	8,784	2,532	3,827	20,690
Klamath	1,898	3,400	7,158	2,043	2,707	17,206
Lake	130	250	527	216	371	1,494
Lane	5,835	11,283	25,997	7,476	11,114	61,705
Lincoln	841	1,682	3,443	1,198	2,048	9,212
Linn	2,511	4,859	9,248	2,712	3,473	22,803
Malheur	1,012	1,992	3,055	812	1,036	7,907
Marion	7,632	15,591	22,732	5,432	8,114	59,501
Morrow	277	575	803	207	289	2,151
Multnomah	10,913	22,007	46,230	13,195	21,669	114,015
Polk	1,171	2,340	4,027	975	1,477	9,991
Sherman	16	48	88	41	60	253
Tillamook	381	844	1,429	560	826	4,040
Umatilla	1,721	3,504	5,314	1,247	1,953	13,739
Union	535	1,089	1,862	480	651	4,617
Wallowa	83	179	361	110	214	947
Wasco	485	898	1,689	511	820	4,403
Washington	5,781	11,852	17,950	4,078	7,438	47,100
Wheeler	11	27	53	28	59	178
Yamhill	1,531	3,309	5,382	1,417	2,235	13,874
Total	62,677	124,710	237,341	65,783	101,823	592,337

