Asset Building Program

State Asset Limit Reforms and Implications for Federal Policy

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The economic downturn brought on by the recent Great Recession inflicted widespread hardship on many families across the United States, though low-income households were particularly affected. Through no fault of their own, lower-income people were particularly vulnerable to macro-economic trends because they lacked the personal resources to get by in a time of unprecedented economic strife. In the face of unemployment, foreclosure or other household catastrophe, families were left to shoulder the responsibility for household resiliency. Public policies can and should play a role in helping families "get back on their feet" by shaping and providing supportive programs that can respond to needs in economic downturns. Ideally, policies and programs will support the desires and goals that most families identify for themselves: to be self-reliant and to have a chance at economic stability and success. Personal savings at the household level and the safety net created by policy should work in tandem to allow families to customize how their resources are applied. By giving families tools that best fit their identified needs, effective policies can facilitate an efficient path to financial independence.

An array of public assistance programs comprise the safety net and offer valuable support to families in times of need. Yet some of these programs are not designed to work together or in ways that complement the benefit recipients' own efforts toward self-sufficiency. Most public assistance programs, including the Supplemental Nutrition Assistance Program (SNAP/Food Stamps) and Temporary Assistance for Needy Families (TANF/formerly AFDC), are means-tested, meaning that applicants have to demonstrate very limited resources (an assessment that always includes income and sometimes savings) in order to be eligible. Means-testing is important for ensuring that benefits are targeted to those most in need, but the particular design of the eligibility criteria can have important and varied impacts on whether the program is effective as both a safety net and "springboard" back to self-sufficiency. Likewise, asset tests were put in place to ensure that funds from anti-poverty programs were not being diverted to wealthy people with significant savings; in practice, however, the tests add complexity, discourage savings, and deny benefits to people who are only marginally better off than those who are eligible.

Asset limits place a family's sources of support in competition with one another. Families either have to spend down their existing savings to become eligible or forego the immediate assistance they need. Then as families become more secure, they are not able to build an emergency savings fund without worrying about their benefits abruptly ending. In most states where an asset limit is in place, this threshold requires that families that receive benefits live in asset poverty. Asset poverty is commonly defined as having insufficient resources to live at the federal poverty level for three months without income. In 2011, the asset poverty rate for a family of three was $4,632,[1] a figure that exceeds the current asset limits for SNAP in ten states and TANF in 41 states.

Although savings should ideally be used to provide a buffer between dips in the household budget and material hardship, requiring families to excessively draw down on or deplete their resources prior to accessing assistance may exacerbate financial instability and reduce the traction these programs can offer families as they seek to transition toward independence. The existence of asset limits and accompanying requirements that applicants and recipients produce documentation of savings and assets also may discourage people from building resources that could help them become stable enough to leave assistance programs. The unintended consequences of poorly-designed policies are to potentially increase the length of time a family remains economically unstable or remains on public assistance. These asset limits also vary significantly across programs and states, so that someone applying for TANF, SNAP, and Medicaid, for instance, may have to comply with three different sets of eligibility rules, yielding a system that is unpredictable, frustrating, and even a deterrent from accessing benefits.

In addition to the impact that asset limits have on households applying for public assistance programs, the tests also introduce complexity and inefficiency into the administration of these programs. The process of verifying bank accounts, the value of vehicles, or even burial plots can be time consuming for caseworkers. As participation in programs like SNAP has soared in response to the down economy, state budget cuts have reduced the workforce available to manage new and existing clients. As a result, there is less capacity and more errors can occur as states struggle to do more with less.

With these considerations in mind, a number of states have eliminated or reformed their asset tests in the last decade. This positive development improves administrative efficiency and makes the programs more responsive to households' needs. Against this tide of progress, however, two states, Michigan and Pennsylvania, have recently reinstated their SNAP asset limits while others are considering doing the same. The mechanism that allows states to adjust their SNAP asset tests, categorical eligibility, has also come under attack in the current Farm Bill debate. These developments offer a timely backdrop for a more extensive evaluation of the effects and implications of asset test policies.

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The existing literature surrounding asset limits addresses their inconsistencies and complex structure, counterproductive messaging, and to some extent, effects on savings. To augment this body of work, this paper will focus chiefly on how reforms to asset tests at the state level have affected the administration of the programs. The research for this piece consisted primarily of survey data and a series of interviews with health and human services administrators from states that have made a wide range of asset limit policy choices, focused on any observable impacts of their state's asset test rules. This paper will provide a brief background on asset test policies over the past decade, present the key research findings, and explore

[1] CFED (2012).

considerations for future state actions and implications for federal policy.

What are Asset Tests – and Why do They Matter?

Most of the largest means-tested public assistance programs have some type of asset test. The actual limits, what types of assets are counted toward them, and when they're applied can vary widely across programs and states. Some of this variation occurs as a result of which administrative body—federal, state, or county—is determining the rules. Asset limits for certain programs, such as Supplemental Security Insurance (SSI), are federally established. For TANF, states have no obligation to adopt asset limits; states have total discretion as to whether to impose any limit and, if so, the amount of the limit and types of assets counted. States also diverge markedly as far as which types of resources count toward their asset limits. The lack of coordination among policies across states and programs is one of the prevailing features of asset tests, resulting in a complex and seemingly arbitrary set of rules and exemptions.

To qualify for benefits, applicants must establish their income eligibility and, for programs with asset tests, must also prove that their resources do not exceed the limit by providing bank statements, car titles, insurance policies and other relevant documents. In some cases, applicants merely need to self-report their assets, while in others caseworkers are required to verify the level of assets based on the documents that are provided. For some programs, participants must make this information available both at their initial eligibility determination and periodically for recertification, which generally happens every six or twelve months. This variation occurs as states exercise options to customize program rules where they have that flexibility; however, the end result can be a confusing and often contradictory set of policies that applicants must navigate.

Previous research has found that asset tests negatively affect low-income families' financial security in at least two distinct ways, which will be discussed in turn below. First, asset tests compel some households to remain outside of the financial mainstream, such as by not holding a bank account. Second, asset tests prevent families from accumulating or maintaining the necessary resources to weather an income shock or unanticipated expense. In the long term, these effects impede families from advancing economically and reducing their need for public benefits over the course of their lifetime.

Recent data from the FDIC revealed that 8.2 percent of American households do not have a bank account and 20.1 percent are underbanked, meaning that they may own a bank account but also utilize alternative financial services and products, such as payday lenders.[2] For households with incomes under $15,000, a full 28.2 percent are unbanked and an additional 21.6 percent are underbanked; in fact, over 70 percent of all the unbanked households in the U.S. make less than $30,000 a year. Families that are unbanked or underbanked more frequently keep their money in cash at home or turn to alternative financial services, which often have high interest rates or unfavorable loan terms that put borrowers at risk of falling into a cycle of debt.[3]

There are many reasons why lower-income families may choose not to maintain bank accounts, including account and overdraft fees, minimum balance requirements, and a general lack of money to keep in an account.[4] However, at least one previous study has found that bank account ownership, regardless of the balance of the account, has a significant negative association with participation in SNAP.[5] Likewise, a 2006 study with TANF participants in Maryland and Virginia found that some applicants feared that having a bank account would compromise their eligibility.[6] Similarly, in a study of eligible non-participants' perceptions of their SNAP eligibility, 73 percent of those who believed they did not qualify for the program had bank

[2] FDIC (2012).
[3] Parrish and King (2009).
[4] Chan (2011).
[5] Huang, Nam and Wikoff (2010).
[6] O'Brien (2006).

accounts, compared to only 62 percent of those who believed they were eligible.[7] This perception could be a consequence of the requirement that applicants provide detailed account information during the application process or a lack of understanding of the program eligibility rules. Regardless of the reason, this research suggests that some portion of applicants perceive that simply maintaining a bank account could jeopardize their access to needed benefits.

Additionally, asset tests discourage saving and impede financial stability. Most fundamentally, asset limits often set a maximum threshold for saving that is far below the amount needed to cope with a medical emergency, car breakdown or other urgent and unanticipated expense. These low limits force families to choose between accessing temporary assistance to make ends meet or maintaining an emergency fund to secure their futures. Moreover, previous research shows that perceptions of asset tests persist even in some places where they have been eliminated, and these perceptions alone have been found to deter saving.[8] Beyond discouraging saving in the first place, asset tests can compel families to deplete existing savings before accessing help. Spending down savings to be eligible for temporary benefits can make financial stability more elusive in the long run, ultimately resulting in increased reliance on public assistance. By contrast, raising or eliminating asset tests increases certain types of asset holdings and thus promotes financial independence. For example, eliminating the limit on vehicles for SNAP participants has been found to increase vehicle ownership, which is often essential for securing and maintaining employment.[9]

Some recent reforms have attempted to mitigate the consequences of asset tests on families' financial stability by excluding certain categories of assets, such as education and retirement accounts, from consideration. In theory, this policy change would allow families to access benefits that would enable them to get back on their feet after a financial setback, while saving for long-term objectives. However, the reality is that most low-income families save for college and other long-term goals in basic checking and savings accounts rather than, for example, in a 529 College Savings Plan.[10] There are many reasons for this. First, the benefits of most restricted accounts derive from their tax-preferred status, which is irrelevant to most low-income families without tax liability.[11] Second, families with low incomes and generally volatile financial situations are understandably reluctant to put all their money into accounts that cannot be accessed in the event of an immediate emergency. For this reason, policies that support the accumulation of short-term savings are essential for facilitating long-term savings. Moreover, while well-intentioned, the addition of detailed lists of exceptions to asset rules adds to the complexity and confusion around asset limits.

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Poorly-designed asset tests with low limits prohibit families from developing a pool of resources and unnecessarily create conflict between immediate and future wellbeing by requiring low levels of savings to access critical services. These eligibility rules also conflict with the goal of public assistance to increase wellbeing and self-sufficiency. While there is some existing data about the impact of asset limits on savings behavior, there is a huge void in our

[7] ERS (2004).
[8] O'Brien (2006).
[9] McKernan, Ratcliffe and Nam (2007); Baum and Owens (2010).
[10] Black and Huelsman (2012).
[11] Black and Huelsman (2012).

understanding of the impact of asset limits on the administration of the programs themselves. This issue has important implications for both state and local agencies and participants. How do asset limit policies affect efficiency and error rates? How do different policies in different programs interact with each other? What are the consequences of those interactions? These are among the questions this research seeks to address.

Current Status of Asset Limits in Public Assistance Programs: Policy, Practice and Politics

As described above, asset tests range widely across states and programs. For TANF, the 1996 welfare reform law gave states the discretion to establish their own financial eligibility criteria. While most states have maintained TANF asset tests around $2000, some have raised them as high as $10,000 and others have eliminated the test altogether. States also significantly vary in which assets count toward their limit.[12] Depending on the state, assets such as retirement and education accounts, life insurance policies and funeral agreements may or may not be included. Most states have excluded at least one vehicle from their TANF asset test, though a few maintain a vehicle equity value limit (the difference between the retail value of the vehicle and what the purchaser still owes on the loan), which may be as low as $4600.

By contrast, the federal government sets the asset limits for SNAP, which are currently $2000 per household or $3250 if the household includes an elderly or disabled member. Though the $2000 limit has not increased since 1985, the 2008 Farm Bill provided that asset limits would be indexed for inflation each fiscal year, adjusting them to the nearest $250 increment. Consequently, the federal asset limit is expected to increase to $2250 in 2014.[13] However, states have the flexibility to raise or eliminate their asset tests for most applicants by implementing broad-based categorical eligibility ("BBCE"), a state policy option first introduced in 1996[14] and codified in regulations in 2000.[15] BBCE allows states to align eligibility for SNAP with eligibility for a non-cash TANF service. BBCE also gives states the option to raise their gross income limits as high as 200% of the Federal Poverty Level.[16] Categorical eligibility was originally designed to simplify the administration of SNAP by allowing states to align the SNAP and TANF rules for families receiving benefits under both programs. However, states recognized that expanding this policy to non-cash benefits would allow them to streamline eligibility determinations and support asset accumulation.

The past decade, and even just the past year, has witnessed some major changes to asset policy in public assistance programs (Fig. 1). At the state level, SNAP in particular has been the site of significant recent reforms, as the number of states that have implemented BBCE has grown from seven in 2006 to 43 today. This growth has been a response to several factors. First, the USDA has taken an active role in promoting BBCE in order to improve access to nutritional supports. In 2009, the Food and Nutrition Service of the USDA sent a letter to regional administrators, urging them to encourage states to implement broad-based categorical eligibility and citing the policy's potential to ease administrative burdens, reduce errors, and promote asset accumulation.[17] Around the same time, the recession drove SNAP participation to record highs and motivated states to find ways to manage their increasing caseloads more efficiently. Implementing BBCE met the moment.

[12] CFED (2011).

[13] Rosenbaum (2008).

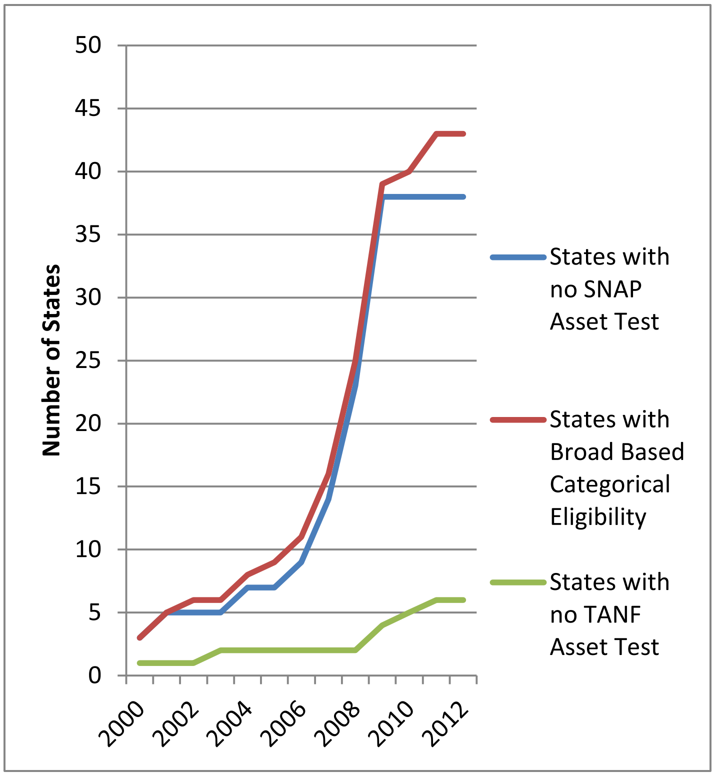
[14] Falk and Aussenberg (2012). In 1996, the Personal Responsibility and Work Opportunity Act (PROWRA) replaced Aid to Families with Dependent Children (AFDC) with TANF. Categorical eligibility did not fundamentally change, but the benefits and services delivered through TANF broadened beyond AFDC's cash assistance. Consequently, states could convey categorical eligibility through delivery of a much wider range of services.

[15] Mabli and Ferrerosa (2010).

[16] States may in fact raise gross income limits higher than 200% FPL through BBCE, but this choice limits the households they are permitted to serve and the services they are permitted to provide. For more details, see Falk and Aussenberg (2012) at p. 4.

[17] USDA (2009).

Figure 1: Trends in State Asset Limit Policies



Most states that have implemented BBCE have chosen to lift their SNAP asset tests entirely, while others have raised them to anywhere from $5000 to $25,000. Furthermore, states can eliminate vehicles from their SNAP asset limits either through BBCE or by aligning their vehicle policy with another program. Most states now exclude all vehicles from their SNAP asset limit. In comparison, far fewer states have lifted their asset tests for TANF. Ohio became the first state to eliminate its TANF asset test in 1997. Since then, only five other states have followed suit, though four of those states did so within the past four years.[18]

In addition to the progress made at the state level, there has also been movement at the federal level to reform asset limits. The 2008 Farm Bill excluded two classes of assets from consideration in determining SNAP eligibility: tax-preferred education and retirement accounts. The new rules signaled an acknowledgment that asset tests were in conflict with families' long-term financial stability. The American Recovery and Reinvestment Act ("ARRA"), which increased benefit levels for the Earned Income Tax Credit ("EITC") and Child Tax Credit ("CTC"), included a provision to exclude tax refunds from consideration as assets for public benefit programs for the twelve months following their receipt. In some states, tax refunds are counted in the month after they are received in TANF, so this provision helped to reduce the likelihood that a more generous EITC or CTC benefit would have the negative consequence of counting against public assistance eligibility. This provision has been extended through the end of 2012.

The Affordable Care Act made the single largest change to asset limits at the federal level by requiring states to eliminate the Medicaid asset test for most households beginning in 2014, regardless of whether the state adopts the expansion.[19] This reform has brought much needed continuity to the rules of the program. Twenty-four states have already gotten rid of the Medicaid asset test for parents, along with 47 that have eliminated the limit for CHIP and children's Medicaid. Of the states that have retained a test for parents, the limits range from a low of $1000 in Georgia to a high of $30,000 in South Carolina, and are inconsistent as far as which resources are counted.[20]

Finally, in his FY2011 budget, President Obama proposed a $10,000 asset limit floor for most means-tested public benefit programs.[21] Although this proposal was not enacted, it is indicative of the changing political tide and growing recognition that asset tests—or at least low asset limits—are frequently counterproductive to the goal of increasing low-income families' self-sufficiency.

[18] Those states are Virginia (2003); Alabama (2009); Louisiana (2009); Maryland (2010); Colorado (2011).

[19] States are permitted to retain asset tests for elderly and disabled Medicaid beneficiaries.

[20] Kaiser Family Foundation (2012).

[21] Hiatt and Newcomer (2010).

Despite the past decade of movement towards reform of asset tests, several recent policy changes suggest we are entering a period of retrenchment. As SNAP has grown dramatically over the past few years in response to the recession, experiencing a 135 percent increase in spending and 70 percent increase in participation between 2007 and 2011, it has drawn the attention of lawmakers at both the state and federal level, triggering conversations about curbing costs.[22] This growth, coupled with highly publicized coverage of two lottery winners in Michigan who were allowed to continue receiving their SNAP benefits since the state had removed its asset limit, has generated misguided concern that BBCE, and the asset limit provision specifically, has created a loophole that has been exploited and contributed to the growth in the program. Analyses from the Congressional Budget Office and others, however, suggest that the increase in participation due to implementation of BBCE is negligible, and eliminating this policy would reduce program spending by a mere 1.6 percent over the next ten years.[23]

Despite the isolated nature of the Michigan lottery winners and BBCE's limited impact on participation, public pressure and political considerations have prompted other states to reassess their asset test policies. Pennsylvania, for example, reinstated its asset test in May and several other states are considering it.[24] Among states that have not reformed asset limits, this environment has made legislatures wary of pursuing any policy reforms that could expand (or appear to expand) the caseload. And, at the federal level, the Farm Bill, which is the authorizing legislation for SNAP, is up for reauthorization. During this process, an amendment was offered to the Senate version to eliminate BBCE, which was ultimately defeated; however, elimination of BBCE was included in the House-passed version. Such a policy would terminate SNAP eligibility for two to three million low-income people and increase the administrative burden on millions more.[25] Negotiations on the Farm Bill are ongoing as of the release date of this report.

Current state and federal policy debates threatening the progress made by states over the past decade have created an imperative to demonstrate the impact that these reforms have had. The changes themselves have created a rich research environment from which to make that assessment.

Research Framework

While recent research has explored the impacts of asset tests, there has been insufficient attention given to the specific influence of asset limits on program administration. This is particularly relevant to current policy discussions which highlight waste, fraud, and abuse as a justification for more restrictive asset limits. Since existing program data do not reflect pervasive problems in these areas, our research focused on an assessment of program administration.[26] We used a range of techniques to gather information that enabled us to classify the experiences of states and evaluate how different policies were associated with a range of outcomes. Specifically, we were interested in evaluating the ways in which asset limits affect the efficiency of eligibility evaluations and case management, serve the intended population, and influence payment accuracy.

The two prevailing questions that guided this research were: 1) Why do asset limits matter, and to whom? and 2) What are the effects of the lack of coordination among asset limits in different programs? Addressing these questions required first defining the scope and components of the research (i.e., which states and programs to focus on) followed by determining the method of gathering data.

[22] Congressional Budget Office (2012); Hanson and Olveira (2012). SNAP expands during economic downturns and contracts during period of economic growth.

[23] Congressional Budget Office (2012).

[24] Wisconsin is one example; legislation was introduced in 2012 to reinstate the SNAP asset test.

[25] Rosenbaum and Dean (2012). Though as many as three million people would lose benefits, the cost savings would be relatively minor because most households that qualify exclusively as a result of BBCE have higher incomes and thus qualify for lower benefits.

[26] Rosenbaum (2012).

Many public assistance programs employ an asset test. For the purposes of this research, however, we selected SNAP and TANF since each plays a distinct role in the services they provide within the social safety net and they differ significantly in funding and administrative structure, income eligibility levels, and asset test policies.

SNAP is the largest and most responsive of the safety net programs, in part because of its entitlement structure, which allows all households who meet eligibility criteria to participate.[27] SNAP benefits are funded entirely by the federal government and states are responsible only for paying half of the administrative costs. This funding structure creates an incentive for states to enroll eligible participants since they can leverage a small amount of state resources to bring in a much larger amount of federal resources, making adoption of BBCE, which provides the mechanism to streamline eligibility determinations, an attractive choice.

By contrast, TANF is a block grant program that provides states with a fixed amount of funding determined at the time of the 1996 welfare reform overhaul and gives states considerable discretion in how that funding is allocated.[28] As the program most closely resembling generalized cash assistance, TANF is a key part of the public benefits system, though the funding structure limits the number of eligible families who ultimately receive benefits. Both income limits and benefit levels for TANF tend to be very low and participants are subject to strict work requirements. Although not required by federal TANF law, most states have chosen to adopt asset tests, which vary widely.

To determine the states surveyed for the study, we developed a classification scheme based on the range of policy choices made by the state. These were:

- SNAP broad-based categorical eligibility/TANF asset test;
- SNAP broad-based categorical eligibility/no TANF asset test;
- Traditional SNAP asset test/TANF asset test;
- Traditional SNAP asset test/no TANF asset test.

A review of state program rules allowed us to assign states to one of these four categories and then solicit data accordingly from a range of states from each group to provide a representative sampling (see the Appendix for a complete listing of the states selected and the criteria used to select them). The majority of states fell into the first category, meaning that they had substantially raised or eliminated their SNAP asset limits but retained a low TANF asset limit.

Next, we surveyed state social services administrators from a select group of states representing each of these categories. The survey instrument was designed to collect a range of information related to program administration, including data about denials and case closures due to excess assets, the effects of asset limits on error rates and administrative costs, and participant and agency experiences with asset test policies, among other variables (see the Appendix to review the complete survey). Follow-up interviews were conducted with most survey respondents, which contributed valuable qualitative data beyond what was captured in the survey.

[27] The first food stamp program originated in 1939 and became permanent in 1964. In October 2008, the federal program was officially renamed the Supplemental Nutrition Assistance Program (SNAP). Benefits are now delivered on electronic benefit transfer (EBT) cards instead of through paper coupons, and can be used exclusively to buy eligible food items. In FY 2012, the maximum benefit level for a family of four was $668 a month. At the time of publication, approximately 47 million individuals were receiving SNAP benefits.

[28] Temporary Assistance for Needy Families (TANF) replaced Aid for Families with Dependent Children (AFDC) in 1996. AFDC originated in 1935 as part of the Social Security Act. The new program imposed a federal 60-month lifetime limit on recipients, though states have the discretion to impose shorter limits or use state funds to provide benefits for longer than 60 months. TANF is available only to households with dependent children. In FY 2011, approximately 4.4 million individuals received TANF benefits each month. Both benefit levels and the caseload have fallen significantly since 1996. In all states, maximum benefits are below fifty percent of the poverty line ($1544/month for a family of three in 2011), while some are much lower.

This research incorporated publicly available data for each of the states that received the survey. States varied widely in the amount of data that was available online; nevertheless, many states' annual reports and press releases supplemented the information received through direct contact with administrators. Lastly, for some states, additional interviews were conducted with local policy and advocacy organizations, particularly in states where these organizations played a significant role in initiating changes to asset test policies.

Key Findings

Employing a full range of research methods allowed us to compare the experiences of different states and offered a strong foundation for understanding a set of dynamics that impact how programs are run and how people interact with them. Taken together, the data from the surveys, interviews, and review of publicly available information produced a number of significant findings. Most notably, the research revealed that most applicants to SNAP and TANF had very few assets and, as a consequence, that eliminating asset tests greatly simplified program administration without significantly increasing the caseload. In other words, because the vast majority of applicants were already living in asset poverty, removing the asset test did not greatly raise the number of new applicants.

In FY 2008-2009, before Louisiana eliminated its SNAP asset test, only .18 percent of case closures were due to excess resources.

This suggests that the asset limit rules don't considerably limit the number of people served by these programs but can add substantial time, effort, and cost to their administration. However, efficiencies gained by making changes in one program may be offset by the requirements of coordinating with other policies and programs. In fact, it is valuable to consider the interaction of rules among a wider set of programs as well as the impact of policy changes in a particular program.

The Percentage of Applicants and Participants Denied because of Excess Assets was Very Low in Every State that Collected that Data

The application process for both SNAP and TANF requires applicants to furnish a variety of personal financial information, including their income, expenses and, if an asset test is in place, resources. For programs with an asset test, the financial eligibility criteria commonly require applicants to be in a state of both income and asset poverty to receive benefits.

Statistics from both our survey and published reports revealed that very few SNAP or TANF recipients were disqualified due to resources. For example, in Idaho, from June 2011 to March 2012, only 2.2 percent of SNAP application denials were due to assets exceeding the state's $5000 limit, compared to forty-five percent for excess income.[29] To provide some context, just over twenty percent of Idaho's applications were denied in FY 2011[30] — meaning that the percentage of total applications denied for excess resources was around one-half of one percent. Similarly, in FY 2008-2009, before Louisiana eliminated its SNAP asset test, only .18 percent of case closures were due to excess resources.[31]

The income eligibility thresholds for TANF are generally considerably lower than for SNAP. For example, the maximum monthly income for a family of three in Alabama applying for TANF is $269, whereas the maximum monthly income for SNAP is just over $2,000. Consequently, families receiving TANF are also much less likely to have countable assets, which was reflected in the

[29] Survey Data.
[30] Idaho Department of Health and Welfare (2012).
[31] Louisiana Department of Social Services (2009).

research.[32] For the three years prior to a proposal to eliminate the TANF asset test in Illinois, for instance, there were no families that were denied benefits due to resources, and only 24 families that stopped receiving TANF due to excess assets.[33] Likewise, in Louisiana in FY 2007-2008 (just prior to the elimination of its TANF asset test), only four total cases were closed due to excess resources.[34] This is fewer than the number of recipients disqualified due to school attendance sanctions (60); institutionalization or incarceration (31); immunization requirements (10) or age requirements (24), respectively. During the same time period in Alabama, which eliminated its TANF asset test in 2009, only 15 of 21,429 TANF denials were due to excess resources, along with 15 of 20,174 closures.[35] In California, which has a TANF asset test of $2000 and is one of the few states to still count vehicles toward the asset limit, 0.96 percent of total denials were a result of assets in FY 2011.[36]

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It is important to note that the way in which states process eligibility determinations may underrepresent the number of families who exceed the resource limit. Many states reported that when their caseworkers evaluated eligibility, they would ask about income first. If the applicant reported excess income, there would be no inquiry as to assets, and thus "excess income" would be the sole reason recorded for the denial even if the applicant would have been disqualified by either metric.

Nevertheless, this data correlates with previous research from the USDA that the average SNAP household with any assets has only $333 in the bank,[37] along with more recent data about the effects of broad-based categorical eligibility from GAO, finding that less than one percent of SNAP cases were closed in either Idaho or Michigan when each state reinstated an asset test.[38] Likewise, more anecdotally, administrators in Louisiana, Illinois and Ohio and benefit screeners in New York City all reported that most applicants to both SNAP and TANF have very few resources. As one state-level TANF administrator recounted, "The elimination of the asset test in [our TANF cash assistance program]…had relatively no impact on the program, because the income limit is still so low that generally the people that were applying still didn't have any resources to speak of."[39] In Colorado, administrators noted that most applicants were exhausting their resources before seeking TANF assistance, describing how "in spite of all the economy and loss of jobs, [applicants] tend to liquidate their resources first before they came in and applied for our program."

Lifting Asset Tests Resulted in Greater Administrative Efficiency, Streamlined Eligibility Evaluations, and Administrative Savings

Verifying assets can be a particularly burdensome component of the application evaluation process because of how complex the rules and exceptions are. This complexity can lead to errors. With SNAP, two-thirds of payment errors are a result of caseworker rather than client error, which reflects the intricacies of eligibility determinations.[40] As an Ohio administrator explained, "from radiation exposure compensation to Agent Orange settlements, to Japanese ancestry permanent resident survivors' benefits…there's just so many different exclusions [from the asset test]…so accuracy for that is hard."[41] Since most clients had few resources to begin with, eliminating an asset test allowed

32 Urban Institute (2011); USDA Food and Nutrition Service (2011).
33 Survey Data.
34 Louisiana Department of Social Services (2008).
35 Alabama Department of Human Resources (2009).
36 Survey Data.

37 USDA Food and Nutrition Service (2011).
38 Government Accountability Office (2012).
39 Interview with state administrators.
40 Brown (2010).
41 Interview with Ohio administrators.

agencies to eliminate needless paperwork, which freed up case workers' time and attention for other case management duties. For example, Illinois reported that eliminating the SNAP asset test "greatly simplified the work for staff and reduced the amount of verifications the applicant is required to provide."[42] Similarly, in Ohio, "moving to expanded categorical eligibility…allows workers more time to process other information regarding the assistance group and allows benefits to be approved in a more efficient manner."[43]

In some cases, states were able to provide more precise quantitative data regarding administrative costs. In Iowa, for example, before deciding to eliminate the SNAP asset test and raise the gross income limit to 160 percent of the Federal Poverty Line, the Department of Human Services determined that the fiscal benefits to the state would far outweigh the costs. Specifically, Iowa found that the direct state costs, including the state share of additional staff and administrative costs would total $702,202; meanwhile, the additional SNAP benefits plus revenue from additional state employment were expected to amount to $12.3 million.[44] The Department also estimated that the policy changes would result in $20.6 million in increased economic activity within the state. Colorado's estimates regarding its TANF asset test were similar. The state forecasted that eliminating the TANF asset test would result in additional benefits for 44 families, at a cost of around $123,000. However, these costs would be offset by greater administrative efficiency; eliminating the asset test would save caseworkers ten to 15 minutes per "case interaction," or up to 90 minutes for the five or six interactions that typically occur between a client and a caseworker in the first 45 days.[45]

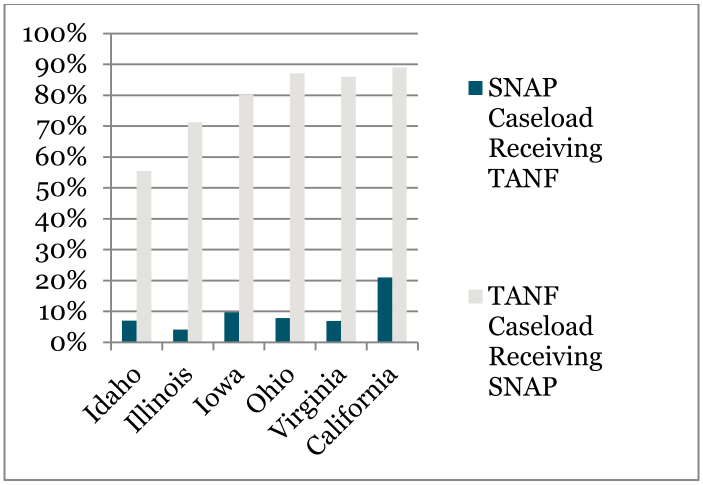
Our survey respondents' reports of greater streamlining, reduced administrative burdens, and cost savings are consistent with previous research regarding policy changes in Ohio, Virginia and a wide array of states that eliminated their Medicaid asset limits. Both Ohio and Virginia witnessed more efficient processing of cases without an increase in caseload following the removal of their TANF asset tests.[46] Virginia also forecasted reduced costs. Before lifting the TANF test, Virginia estimated that it would spend around $127,200 in benefits for 40 additional families, but that this expense would be offset by $323,050 in administrative savings.[47] Oklahoma saved approximately one million dollars in administrative costs when it eliminated its Medicaid asset test in 1997, while Delaware reported that lifting its test resulted in administrative simplicity. Likewise, the District of Columbia stated that, "Our goal was to make…expanded Medicaid eligibility simple for families and for the agency—having no asset test met those goals."[48]

Lack of Policy Coordination among Programs Can Undermine the Benefit of Liberalizing an Asset Limit in One Program Alone

The size of the population that participates in both SNAP and TANF is an important piece of information for evaluating the scope of the impact of inconsistent policies in these two programs that target similar populations. By and large, all states reported that a considerable proportion of their TANF caseload also received SNAP, while a much smaller percentage of the SNAP caseload also received TANF, though these numbers varied significantly among the surveyed states (Fig. 2). Nationally, around eight percent of the SNAP caseload also receives TANF,[49] and approximately 81 percent of TANF cash beneficiaries also receive SNAP.[50]

[42] Survey Data.
[43] Survey Data.
[44] Iowa Department of Human Services (2009).
[45] Interview with Colorado administrators; CDHS notes for Colorado legislature (on file with authors).
[46] Rand (2007).
[47] Virginia Department of Planning and Budget (2003).
[48] Chang, Ellis and Smith (2001).
[49] Congressional Budget Office (2012).
[50] Zedlewski (2012).

Figure 2: Overlap in SNAP and TANF Caseloads



The overlap in caseload, or "layering" of benefits, is an important parameter for analyzing how the existence of different asset policies in different programs affects participants' expectations and experiences.[51] As previously described, most states that have eliminated their SNAP asset tests still have low TANF asset limits. Consequently, the practical impact of lifting the SNAP asset test for a family that also receives TANF is negligible, since the household will nevertheless have to provide proof of their resources, which will in turn need to be verified by eligibility workers. In California, for example, although there is no SNAP asset test for the vast majority of applicants as a result of broad-based categorical eligibility, over 20 percent of participants also receive TANF and will thus be subject to its $2000 asset limit.[52]

Because of the significant overlap in caseloads nationwide, millions of households are subject to multiple and inconsistent asset tests (Fig. 3). The number of households receiving both SNAP and TANF is large enough that the inconsistency among asset test policies in those two programs alone is a significant source of confusion and needless complexity. Adding Medicaid to the mix, the potential for misunderstanding becomes even greater; as an Ohio administrator explained, despite the absence of an asset test for either SNAP or TANF, some applicants still came to apply for those programs expecting to face an asset limit, largely because of the enduring Medicaid asset test and related "look-back" period. Finally, the overlap of caseloads lessens the impact of an asset limit policy change that occurs in either program in isolation (like BBCE or the upcoming elimination of the Medicaid limit). This suggests that inconsistencies in program policies have a negative impact on program access and diminish gains to administrative simplicity.

Figure 3: Households Subject to Multiple Asset Tests

State	SNAP Asset Limit	TANF Asset Limit	% SNAP Caseload Receiving TANF	# SNAP Households Receiving TANF*
California	n/a	$2000	21%	338,693
Idaho	$5000	$2000	7%	6740
Illinois	n/a	$2000	4%	34,391
Iowa	n/a	$2000	10%	17,319
Ohio	n/a	n/a	8%	67,790
Virginia	$2000	n/a	7%	28,477
TOTAL				493,410

* Based on 2011 average monthly SNAP households

Problems with Implementation Can Undermine Benefits of Policy Change

While lifting asset tests simplified the application process, issues with implementation, rooted in the inconsistent policies among programs, produced mixed results for agencies and participants. For example, several states reported that although they had eliminated the asset test for SNAP, this change was not reflected on the program applications, which could perpetuate the perception of an asset test. In fact, almost none of the states that have implemented broad-based categorical eligibility have revised their applications to account for the change; at least

[51] O'Brien (2009).
[52] Survey Data.

22 states that have eliminated their SNAP asset test still ask SNAP applicants for asset information on their combined forms. This may cause considerable confusion for applicants and may even discourage eligible applicants from accessing much-needed assistance.

The questions on a public benefits application often inform an applicant's initial impressions of their potential eligibility. Most states primarily—and often exclusively—use combined benefit applications, which most commonly allow households to apply for SNAP, TANF and Medicaid at the same time. A few states that have eliminated their SNAP asset limits but retained tests for other programs have added disclaimers to their combined applications; Delaware, for example, clarifies that its resource question is "for cash assistance only." New York's SNAP-only application states that, "[r]esources do not affect the eligibility of most households applying for Food Stamp Benefits. However, some resource information is used to determine if you qualify for expedited processing of your application." The state's combined application, however, contains no such disclaimer. Some states that still have SNAP-only applications even ask for resource information on those forms, despite having eliminated the asset test (see Appendix for a description of states' applications as of publication). Asking families to include this information makes the application process unnecessarily burdensome and reinforces public perceptions of the benefits application process as bureaucratic and complex.

It is important to note that as a general matter combined benefit applications have streamlined the application process and allowed families that are most in need and eligible for multiple programs to receive help in a more efficient manner. Still, the lack of policy coordination among the programs included in the combined applications is problematic. Without remedying this underlying issue, the combined applications will continue to require applicants to supply burdensome and unnecessary information, which has been found to discourage some applicants from applying.[53]

Additionally, these applications could potentially have a "chilling effect" on applicants who intend to apply only to a single program without an asset test by giving them the mistaken impression that their asset information is relevant. Previous research has found that the mere awareness of an asset limit in another program or in a neighboring state can deter participation or savings behavior by triggering the perception of an asset test where none exists.[54] Actual requests for asset information where it is not required exacerbates this confusion. Public benefits are ideally designed to support families in times of need and provide a launch pad to future stability. Complex applications, requests for unnecessary information, and incorrect information about eligibility all hamper the ability of families to apply for and receive the benefits that can enable them to weather a period of hardship.

At least twenty-two states that have eliminated their SNAP asset test still ask SNAP applicants for asset information on their combined forms.

Finally, in addition to outdated applications, some states reported that caseworkers were not always adequately trained to implement new asset test policies. In Louisiana, for example, administrators described how some caseworkers still asked for resource information from applicants that should not be subject to asset tests. If asset limit policies were consistent across programs, they would be easier to predict and understand for both participants and caseworkers.

[53] Dorn and Lower-Basch (2012).
[54] O'Brien (2006). Nam (2007).

Considerations for Future Action

The set of findings described above can be used to inform future policy reforms which can improve the effectiveness of these public programs for recipients of assistance. Additionally, there are potential benefits for program administration. The experience of state administrators who have successfully navigated policy reforms can be useful as a model for other states considering similar policy changes, as well as for identifying areas that require additional evaluation.

State Agencies Face a Variety of Political and Resource Barriers in Seeking to Lift Asset Tests in Their Programs

Many states reported that public concerns about program integrity, often reflected by the legislature, were a significant impediment to any new efforts to eliminate asset tests. As a result of the Great Recession, SNAP participation has grown significantly in recent years, prompting renewed and misguided concerns about waste, fraud and abuse. For example, despite the prevalent statistics about low error rates in SNAP,[55] nearly all states reported that the news about the two lottery winners in Michigan who continued to receive SNAP benefits had reverberated in their own states, bringing new attention to the asset test or lack thereof and putting additional pressure on SNAP administrators.

Additionally, some states faced other practical and logistical barriers to policy reform. In Virginia, for example, administrators reported that it was a lack of funding for the TANF-funded service that would confer broad-based categorical eligibility that deterred implementation of the policy.[56] Being the only state to have lifted its TANF asset test but maintained the federal SNAP asset limits, Virginia is an outlier. Apparently, however, this somewhat unconventional set of asset test rules resulted at least in part from resource constraints rather than a deliberate policy choice. Similarly, some states cited the introduction of new technology systems as a potential barrier or at least source of delay for policy reforms, since any change would require reprogramming and retraining of staff.[57]

Lastly, states reported varying degrees of difficulty with eliminating their asset tests depending on whether the new rule required an amendment by the legislature or a change to the administrative code. Generally the process of changing the administrative code was simpler and more expedient, and resulted in less negative public attention to the policy change. However, the corollary of less public attention is less awareness on behalf of people who may newly qualify for benefits. Either way, since communicating accurate information about asset eligibility to applicants has been found to be a persistent challenge,[58] advocacy groups often have a significant role to play in conducting outreach and educational efforts in the wake of a policy change.

Key Motivations for States in Implementing Asset Limit Reform

Cost

Most survey respondents reported that as a result of the Great Recession, their caseloads were increasing while their staff was decreasing. Illinois, for example, reported a 55 percent increase in its SNAP caseload over the past five years, compared with a 13 percent staff decrease.[59] These accounts mirror national trends, as SNAP participation has grown 70 percent between 2007 and 2011.[60] In response to increased need and dwindling resources, states prioritized policies that could increase efficiency in eligibility determinations and case management, such as lifting asset tests and implementing simplified reporting.

[55] Rosenbaum (2012).

[56] Interview with Virginia administrators. Examples of the types of services that most commonly confer BBCE include hotline referral services and brochures about public benefits, family planning or domestic violence. Trippe and Gillooly (2010).

[57] The Affordable Care Act provides one opportunity for systems modernization supported by federal funds. See Heberlein et al. (2012).

[58] O'Brien (2006).

[59] Interview with Illinois administrators.

[60] Congressional Budget Office (2012).

Still, despite the known potential for efficiency gains, most states that eliminated asset tests reported that legislators or administrators initially expressed concern that the change would result in a significant increase in caseload. This is reflective of a political climate that views upticks in caseloads as indicative of rampant dependence on government, rather than people seeking out and receiving support they need and are qualified for. However, our survey respondents experienced minimal adjustments to their actual caseloads due to policy changes. Ohio reported no increase in enrollment as a result of the elimination of its TANF asset test in 1997. Virginia, the second state to eliminate its TANF limit, witnessed its caseload rise initially, but administrators reported that it was more a consequence of the lagging economy than the elimination of the asset test. More recently, Illinois experienced some increase in its SNAP caseload following the implementation of broad-based categorical eligibility, but did not attribute the increase to the change in policy. These findings are consistent with recent research from the Congressional Budget Office that eliminating the SNAP asset test nationwide would result in an increase in both caseload and costs of only around a tenth of a percent.[61]

"It did not make sense to have resources counted against a client when we [had] TANF programs encouraging them to save money to buy a house and send their kids to college."

Program Integrity

Some states chose to eliminate their asset tests to improve their payment accuracy rate. Ohio, for instance, was facing federal sanctions of over $3 million due to its low payment accuracy for SNAP.[62] Having to verify assets, administrators reported, resulted in a significant number of payment errors. Consequently, a consultant hired by the state found that one option to increase payment accuracy would be implementing broad-based categorical eligibility and eliminating the SNAP asset test. Removing the asset test not only eliminates errors related to assets, but should also decrease errors in calculating income, because workers are freed up to focus more on those determinations.

Furthermore, none of the states surveyed identified increased error rates since eliminating their SNAP asset tests. Illinois reported that its error rate had decreased, but because the asset test was eliminated at the same time as the implementation of simplified reporting, the change in the error rate could not conclusively be attributed to getting rid of the asset limit. Administrators in California had not observed any change in error rates, but noted that it was a little early to evaluate the effects of its policy changes since the asset test was only eliminated for all eligible households in 2011.

Mission

Some states' decisions to eliminate their asset tests were rooted in the principle that asset limits pose a barrier to long-term self-sufficiency. Several state administrators reported that their changes to asset test policies were motivated by the recognition that asset limits counter the long-term goals of public assistance programs. Louisiana, one of the six states that has eliminated its TANF asset test, did so in part because the asset limit was in conflict with the purposes of individual development accounts ("IDAs") and educational accounts that the state formerly had available for TANF recipients. IDAs are matched savings accounts that can be used to purchase a first home, capitalize a business, or pay for post-secondary education. In Louisiana and a number of other states, federal TANF funds are invested in IDA programs for low-income residents, as provided by the Assets for Independence Program. As a Louisiana TANF administrator explained, "It did not make sense to have resources counted against a client when we [had] TANF programs encouraging them to

[61] Congressional Budget Office (2012).
[62] Interview with Ohio administrators.

save money to buy a house and send their kids to college."[63] Furthermore, administrators noted that the asset limit would be in tension with current components of its TANF program, including parenting skills and job readiness trainings, which encourage participants to save.

Likewise, Ohio reported that its elimination of the TANF asset test reflected an understanding that individuals need to have cars and bank accounts to obtain and keep employment.[64] Finally, an administrator in Colorado noted that asset tests kept families in financially unstable situations that could ultimately increase their reliance on public benefits in the long run: "Asset limits really discourage savings that are necessary for individuals to become or stay self-sufficient. We often found that requiring income-eligible individuals to spend down their assets put them more in a vulnerable situation and really put more time on TANF in some situations and actually caused more work for our county staff."[65]

Directions for Future Research

While this research produced several findings that advocates and administrators could apply to their asset limit reform efforts, it also identified areas where additional research would produce a more complete picture of how reforming asset limits could impact savings accumulation and program administration.

Asset Limits and Savings Behavior

First, it would be highly valuable to conduct some updated studies on the effects of asset tests on savings behavior. As discussed, one of the most troubling consequences of asset tests is their potential to compel applicants to spend down their existing savings in order to access help—thus rendering families far more financially vulnerable in the long-term than they would be if they could maintain a savings cushion. Survey results and additional research indicated that in most cases assets are inconsequential to determinations of eligibility; the vast majority of applicants to public assistance programs have few other resources to turn to. However, these numbers do not shed any light on whether participants are accessing SNAP or TANF because of low levels of assets, or whether they are spending down their assets in response to the policy in order to become eligible.

Previous studies have shown that many applicants use up their existing savings before applying for assistance[66] and that individuals already participating in SNAP are likely to have significantly less in savings than eligible non-participants.[67] These findings would suggest that applicants spend down their assets before accessing the program, as does the anecdotal information that was conveyed in our conversations with program administrators, but it remains unclear to what extent, if at all, these choices are influenced by the policy. In other words, there is little evidence in the existing body of work on SNAP and TANF asset limits that applicants deplete their savings accounts for the specific purpose of becoming asset-eligible for these programs. New research about this issue, especially as many families are turning to public assistance for the first time in the wake of the Recession, could be illuminating. In particular, it would be useful to examine whether the elimination of the SNAP asset tests in most states has had any noticeable effects on asset retention or accumulation.

Additionally, the state survey data did not indicate how asset ownership affects applicants' perceptions of their eligibility. As previously noted, bank account ownership, regardless of the account balance, has been found to have a significant negative association with SNAP participation. In the same study, a significant portion of eligible non-recipients believed they did not qualify because of their vehicles or other assets.[68] Going forward, given the substantial recent reforms to SNAP asset policies, it would

[63] Interview with Louisiana administrators.
[64] Survey data.
[65] Interview with Colorado administrators.

[66] O'Brien (2006).
[67] Economic Research Service (2004). Among participants in a 2000 study, those who were receiving food stamp benefits had average assets of $77, while eligible non-recipients had $804.
[68] Huang, Nam and Wikoff (2010).

be useful to collect and analyze updated data on both of these issues.

Administrative Efficiency

In order to more fully evaluate the impacts of policy changes like the elimination of an asset test, several administrators noted that policymakers would benefit from more effective measurements of administrative efficiency. Administrative costs are not only difficult to estimate, but also incomplete indicators of the streamlining and reduced administrative burdens that may result from lifting asset tests. Furthermore, while some states have provided administrative cost estimates in anticipation of a policy change, few have collected this data after the fact. Another metric that would allow both administrators and policymakers to quantify gains to administrative efficiency resulting from policy changes would allow for more data-driven policy reforms going forward. However, administrators noted that without a mandate or funding directed toward collecting specific data, states generally lacked the time or budget capacity to do so.

> Asset limits have cross-cutting implications, from the financial security of low-income families to the efficiency of the programs themselves.

Consistency of Asset Limits

Finally, turning to the policies themselves, a persistent theme throughout this research was the way inconsistent asset rules across programs negatively affect applicant and agency experiences. Identifying policies that further integrate asset eligibility across programs would aid in reducing these burdens. Furthermore, program delivery that communicates current policy is an area for improvement in the administration of the programs. In order to improve program delivery, however, states need access to adequate resources to implement policy changes and track their effects.

Asset limits have cross-cutting implications, from the financial security of low-income families to the efficiency of the programs themselves. At a time when 47 million people are receiving SNAP and state budgets continue to suffer and produce cuts to staff that administer public assistance programs, understanding the impact of policy choices becomes increasingly consequential. As policy makers continue to evaluate actions to either simplify or reform asset limits or make them more burdensome, this research demonstrates that, far from removing safeguards to program integrity and opening programs to increased caseloads, removing asset limits increases program efficiency, reduces errors, and can even reduce costs. Perhaps more importantly, it sends the signal that saving, investing in your own wellbeing, should be encouraged, and that in times of hardship, families can access the short-term benefits they need without being penalized for taking responsible actions.

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Appendix

*States Selected for Analysis by Policy Choices**

State	BBCE/No TANF Asset Test	BBCE/TANF Asset Test	No BBCE/No TANF Asset Test	No BBCE/TANF Asset Test	Responded to Survey
Alabama	X				
California		X			X
Idaho		X			X
Illinois		X			X
Iowa		X			X
Louisiana	X				X
Massachusetts		X			
Michigan		X			
New York		X			
Ohio	X				X
Pennsylvania		X			
Texas		X			
Utah				X	X
Virginia			X		X
Wyoming				X	

*Additional interviews were conducted with state administrators in Colorado and benefit screeners in New York, though these states did not provide survey data.

Survey Questions and Answers

	California	**Idaho**	**Illinois**	**Iowa**	**Louisiana**	**Ohio**	**Utah**	**Virginia**
What are the current liquid assets tests for TANF and SNAP in your state? What is the TANF vehicle limit/policy?	SNAP: There is no liquid asset test (except for ES) due to BBCE TANF: Using current federal SNAP asset limit ($2000/$3000) TANF vehicle limit/policy: When computing the value of a	TANF: $5000 Exclude one vehicle per adult household member, apply limit of $4650 to each of the remaining vehicles. SNAP: $5000	For TANF, the asset limits on nonexempt assets are: for one person $2000; for two persons - $3000; for three or more person - $2000 for the first two and $50 for each additional person. The TANF vehicle asset policy: the equity value of one vehicle is exempt. If a unit has more than one vehicle, the equity value(s)	TANF: $2,000 - applicants and $5,000 - participants SNAP: $3,250 if one or more age 60 or older or disabled $2,000 all other households TANF VEHICLE: Exempt one motor vehicle without	There is no liquid asset test for TANF. The liquid asset test for SNAP is $2000 and $3250 for elderly/ disabled households. However, LA implemented Broad Based Categorical Eligibility (BBCE), so households	SNAP: For assistance groups that do not qualify for categorical eligibility the asset limit is $3,250 for assistance groups containing an elderly or disabled member and $2,000 for assistance groups that do not contain an elderly or	SNAP $2000 for all except elderly/ disabled SNAP $3250 for elderly/ disabled TANF $2000	SNAP - $3250 if household contains an elderly member (age 60 or older) or disabled member • $2000 for all other households No broadbased

	California	Idaho	Illinois	Iowa	Louisiana	Ohio	Utah	Virginia
	licensed vehicle which has not been totally excluded or is not equity exempt, determine both the fair market value (FMV) and the equity value of the vehicle. The larger of the two values is considered the resource value and counted in the resource limit. Computation of FMV: $5000 FMV - 4650 exclusion limit $350 Excess FMV Computation of Equity Value: $5000 FMV - 3250 Amount Owed $1750 Equity Value The greater of the two amounts to be considered as a resource is $1750.		of the additional vehicles are counted toward the family's asset limit. For SNAP, a unit is not subject to an asset test when all members are authorized to receive a TANF funded brochure, Guide to Services. Through the receipt of this TANF funded service, households with an elderly, blind or disabled member whose total gross monthly income is at or below 200% of the federal poverty level and all other units whose total gross monthly income is at or below 130% are considered categorically eligible, except units with a member who is sanctioned or is an intentional program violator. Noncategorically eligible elderly, blind or disabled units (gross monthly is above the 200% FPL) have an asset limit of $3250. The asset limit for all other noncategorically eligible units is $2000.	regard to its value. This exemption applies to one motor vehicle for the TANF eligible group. Consider the value of any additional vehicles owned by the eligible group, as described in Equity Exclusion. Exclude the equity value up to $5,455 in one motor vehicle for each adult (including a needy nonparental relative) and working teenage child whose resources must be considered in determining eligibility.	who are eligible for BBCE (most are), there is no assest test.	disabled member. TANF: There is no liquid asset test or vehicle limit/policy for TANF in Ohio.		categorical eligibility TANF - no asset test
What percentage of TANF beneficiaries also receive SNAP? What	89% of TANF beneficiaries also receive SNAP. 21% of SNAP beneficiaries also receive	For July 2012, 7% of Food Stamp Clients also received TAFI. For the same time period, 54% of	Of the 49,632 TANF units, approximately 35,389 units receive SNAP benefits (71.3%). Of the 865,470 active SNAP units, approximately	TANF receive SNAP: 80.2% - however the actual number is higher. We had to use raw data that doesn't show the whole	Will provide this data through e-mail at a later date. *Later data:* Programmers are not available at this time.	In March 2012: % of TANF recipients receiving SNAP: 87.1% % of SNAP	We don't have that data.	86.03% of TANF recipients also receive SNAP. 6.95% of

	California	Idaho	Illinois	Iowa	Louisiana	Ohio	Utah	Virginia
percentage of SNAP beneficiaries also receive TANF?	TANF/CW.	TAFI Clients also received Food Stamps while 97% of the TAFI Work Required (excluding Child Only Clients) received Food Stamps.	4.1% receive TANF benefits	story. The true amount is in the 90% range. SNAP receives TANF: 9.7%		recipients receiving TANF: 7.9%		SNAP recipients receive TANF
If there is broad-based categorical eligibility in place for SNAP, what percentage of SNAP beneficiaries qualify through broad-based categorical eligibility? What percentage qualifies through traditional categorical eligibility?	40% of SNAP beneficiaries qualify through traditional categorical eligibility. Still trying to determine the actual impact so far regarding BBCE.	[No response]	We do not have this information readily available.	Eligible because of BBCE: 32,135 Eligible because of traditional CE: 49,072	We do not measure the number of BBCE households in LA. I should be able to provide the traditional cat el stats at a later date. *Later Data:* 16.8% ---- 65,784 out of 392,175 cases in April 2012 were categorically eligible.	We do not track the percentage of assistance groups that qualify for broad-based eligibility or traditional eligibility.	We don't have broad based categorical eligibility. We don't have that data.	N/A
What percentage of applicants to each program are denied solely because of the asset test(s)? What	FFY 2011 CalWORKS – Average Monthly Applications on Hand Each Month: 84,434 Number of denials due to excess resources: 812 (0.96%)	a. TANF: During the 06/15/2011 through 3/15/2012 time period, 0.3 % of denied applications were denied for Over Resources.	We do not have this information readily available.	1. Unknown 2. Our system does not have that capability	Will have to provide this data at a later date. Later Data: Excess assets: .05% ---- 5 out of 9,921 denials were denied with Code 30 for April 2012. Excess income	We do not track the percentage of assistance groups denied for assets or income.	We don't have that data.	For 2011, 2.09% of SNAP applications were denied due to excess resources. NA for TANF.

	California	Idaho	Illinois	Iowa	Louisiana	Ohio	Utah	Virginia
percentage of applicants are ineligible because of both excess income and assets?	Number of denials based on excess income: 5,319 (6.3%) CalFresh – Average Monthly Applications During the Month: 253,748 Number of denials due to excess resources: N/A Number of denials due to excess income: N/A	During this period, 7.5% of denied applications were denied due to Over Income. There were no cases closed at re-evaluation due to Over Resources. An asset test is only run if the client passes the Income Test. We would not capture any individuals denied for Over Income that may also be Over Resources. b. SNAP: During the 06/15/2011 through 3/15/2012 time period, 2.2 % of denied applications were denied for Over Resources. During this period, 45.5% of denied applications were denied due to Over			and assets: 6.1% -- -- 5 - Code 30 (+) 607 - Code 11 = 612 out of 9,921 denials for April 2012.			

	California	Idaho	Illinois	Iowa	Louisiana	Ohio	Utah	Virginia
		Income. At re-evaluation, 0.8% of closures were closed due to Over Resources and 7.4% of closures were closed due to Over Income. An asset test is only run if the client passes the Income Test. We would not capture any individuals denied for Over Income that may also be Over Resources.						
What particular types of assets most commonly disqualify applicants to TANF? Choices: Savings Vehicles Retirement Accounts College Savings Accounts N/A Other	Vehicles	Unable to determine without reviewing each denied case individually	N/A	Not tracked	N/A	N/A	We don't have that data.	N/A
What particular types of	N/A	Unable to determine without	N/A	Not tracked	Savings	N/A	We don't have that data.	Savings

	California	Idaho	Illinois	Iowa	Louisiana	Ohio	Utah	Virginia
assets most commonly disqualify applicants to SNAP? Choices: Savings Vehicles N/A Other		reviewing each denied case individually						
What percentage of those who are denied because of the asset test reapply within six months? Of those who reapply, what percentage qualifies?	[No response]	Unknown	N/A for TANF For SNAP, we do not have this information readily available.	Not tracked	We will provide this data at a later date. *Later data*: This is not feasible. Not enough cases closed with Code 30 for the time it would take to pull the data.	SNAP-We do not track denials due to excess assets. TANF-There is no asset test.	We don't have that data.	data unavailable
What is the average value of the assets owned by applicants?	[No response]	Unknown	We do not have this information readily available for TANF or SNAP	Not tracked	Not sure that this data is available. If it is, it will be provided at a later date.	We do not track the assets of assistance groups.	We don't have that data.	data unavailable
What percentage of applicants has bank accounts? In your experience, has the existence of asset test(s) affected applicants' or	[No response]	Unknown	We do not have this information readily available for TANF or SNAP	Not tracked	We do not capture this data.	We do not track assets of assistance groups.	We don't have that data.	data unavailable

	California	Idaho	Illinois	Iowa	Louisiana	Ohio	Utah	Virginia
recipients' savings or use of financial services?								
For what length of time are TANF or SNAP recipients receiving assistance on average?	During quarter four of federal fiscal year 2010, the average time on aid for CalWORKS recipients is 32.8 months during the last 72 months. SNAP households average time on aid is 22 months.	Unknown at this time. The recession has impacted this figure and we currently do not have an easy method for determining this. We are working on enhancing our data warehouse and will be able to pull this type of data in the future.	We do not have this information readily available for TANF or SNAP	TANF: 21.11 months SNAP: 25.55 months	Will have to provide this data at a later date.	This information is not readily available.	We don't have that data for SNAP. TANF has a 36 month time limit but we don't have data on the average length of time for assistance.	SNAP - median of 6.2 months For one parent, not disabled families (three-fourths of all TANF cases), median total time on TANF is about 12 months
What are the administrative costs of administering the asset test(s)? Have administrative costs changed due to any policy reforms?	[No response]	We don't currently break this out	For TANF: We do not have this information readily available. For SNAP: We do not have the actual costs readily available, but we estimate it to be relatively low.	Unknown	This data is not captured.	Our programs are administered at a county level and we are unable to break down administrative costs specific to the asset test. However, we do recognize that moving to our expanded categorical eligibility policy did save in administrative expenditures as county workers now have less verification to gather. In addition, documentation of	We don't have that data.	unknown

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						some assets can be difficult to obtain and even harder to determine an accurate value which was at times quite time consuming for our counties.		
Are there any current proposals to eliminate or liberalize the asset test(s) in your state?	Assembly Bill (AB) 2352 would eliminate the vehicle asset test for one vehicle as a condition of eligibility for applicants and recipients for TANF benefits.	Idaho eliminated the asset test for 2 years then reinstated it, at $5000 in June 2011. There are currently no plans to change it.	We have attempted to eliminate the asset test for TANF twice previously – in 2004 and 2011. While the asset limits are not in our State law, they are in our Administrative Code, a committee made up of legislatures must sign-off on the proposed change. We have not received that committee's approval. For SNAP: No	No	There are no current proposals but this is something that may be considered in the future.	We are currently researching different ways to address the issue of lottery winners for the SNAP program.	There are no plans to liberalize assets for SNAP or TANF.	No
What is the method of verification for an applicant's assets?	Bank Statements DMV Registration Deeds of Trust Tax Returns Mortgages Notes Payments receipts Loan payment books Delinquent tax liens Judgment items Mechanics liens Assessments Unpaid balance on property "Blue book"	If their claimed asset is below, but within 10% of the $5000 limit, applicants/recipients are required to provide documentation of the value of the asset (bank statement, for example).	For TANF and for noncategorically eligible SNAP units, an applicant is asked to provide verification of the asset (i.e, bank statement, vehicle title, insurance policy, etc.).	Gather verification from a third party	The client is responsible for providing the verification. Client statement is taken for the value of assets being reported of less than $1500.	Verification would consist of receiving documentation of the asset by either the client, financial institution or through a data match.	Customer statement, electronic matches (vehicles), verifications requested from customer.	SNAP - Applicants must declare the amount of their liquid resources at each application. Unless the declared amount is questionable or the household fails to declare an amount, the agency must not request verification of

	California	Idaho	Illinois	Iowa	Louisiana	Ohio	Utah	Virginia
								resources. When verification is requested, the agency may obtain verification of liquid resources through checking and savings account statements, clearances sent to banks and savings institutions, credit union statements, etc.
If the asset test for either SNAP or TANF has been eliminated, how has this policy change affected the work of eligibility workers and agency staff? How has this policy change affected the enrollment experiences of	N/A for CalWORKs	N/A	N/A for TANF. For SNAP, it greatly simplified the work for staff and reduced the amount of verifications the applicant is required to provide.	N/A	This has not changed the work of eligibility workers in any meaningful way. Some workers are still confused about this change even though it was implemented over a year ago. I don't think this has affected the application experience of those applying for services.	SNAP-The asset test has been eliminated for most assistance groups. Assistance groups with members that have an Intentional Program Violation or have a work program sanction are not considered categorically eligible for food assistance. This change allows workers more time to process other information regarding the assistance group and allows benefits	We don't have that data.	There is no TANF asset test. This has simplified the eligibility process for both applicants and eligibility workers. Applicants/recipients do not have to provide verifications of resources and eligibility workers do not have to process information

	California	Idaho	Illinois	Iowa	Louisiana	Ohio	Utah	Virginia
applicants?						to be approved in a more efficient manner.		about resources.
Please provide any additional comments or thoughts you have about the role of asset tests in your state.	[No response]	[No response]	In our efforts to eliminate the asset test for TANF, we argued that families who are seeking and receiving TANF do not have assets, In the 3 years prior to our proposal, there had been no families denied because of assets and only 24 families stopped receiving TANF during that 3-year period because of excess assets, To receive TANF cash, adults must comply with fairly stringent work and training policy that requires 20 or 30 hours of participation per week. We argued that is unrealistic that someone with a high value of assets would wish to continue in the program.	[No response]	[No response]	[No response]	[No response]	[No response]

State Applications: Combined Applications and Asset Questions (as of September 2012)
(Still Has SNAP Asset Test)*

State	Combined Application with SNAP	Programs on Combined App	Combined App Asks about Resources for SNAP?	Separate SNAP-only Application?	SNAP-only App asks about Resources?	Notes
Alabama	N	N/A	N/A	Y	N	
Alaska*	Y	SNAP, TANF, Medicaid, Child Care and GA	Y	N	N/A	does not have BBCE
Arizona	Y	SNAP, TANF, Medicaid	Y	N	N/A	also CHIP on online app; combined paper application still asks for assets for SNAP
Arkansas*	Y	SNAP, TANF, Medicaid	Y	N	N/A	does not have BBCE
California	Y	SNAP, TANF, Medicaid	Y (expedited only)	Y	Y	SNAP only app has one question about resources; combined app only asks for expedited service
Colorado	Y	SNAP, TANF, Medicaid	Y (expedited only)	N	N/A	combined app asks for resources only for specific programs
Connecticut	Y	SNAP, TANF, Medicaid and GA; SNAP, Medicaid, GA (adults only)	Y	Y	Y	combined app still asks for assets for SNAP applicants - except for death benefits, which is marked with a star; SNAP only app asks for assets for emergency benefits or if income exceeds limits (185% FPL)
Delaware	Y	SNAP, TANF, Medicaid, Child Care and GA	N	N	N/A	resource question on app specifies "for cash assistance only"

State	Combined Application with SNAP	Programs on Combined App	Combined App Asks about Resources for SNAP?	Separate SNAP-only Application?	SNAP-only App asks about Resources?	Notes
DC	Y	SNAP, TANF, Medicaid	Y	N	N/A	combined app still asks for assets for all applicants; other sections specify certain programs (i.e. "housing, utilities and other bills" are "food stamps only" questions)
Florida	Y	SNAP, TANF, Medicaid	Y	N	N/A	app is all online; I did not fill out all the info to get to the assets questions but the "progress bar" suggests it asks about liquid assets, insurance, vehicles, settlements, and asset transfers. Could not open PDF of paper app.
Georgia	Y	SNAP, TANF, Medicaid	N	N	N/A	Also child care on online app; paper app does not ask for resources but does say "Your income, resources, and family size determine benefit amounts" without distinguishing among programs
Hawaii	Y	SNAP, TANF, GA	Y	N	N/A	combined app still asks for assets (including "Christmas savings" and "Other (Specify, i.e. Jewelry, TV, Radio, Stereo, Musical Instruments, Hobby Items, Etc.)"); also asks about transfer of resources in past 3 months specifically for SNAP applicants
Idaho*	Y	SNAP, TANF, Medicaid, CHIP, and	Y	N	N/A	$5000 asset limit

State	Combined Application with SNAP	Programs on Combined App	Combined App Asks about Resources for SNAP?	Separate SNAP-only Application?	SNAP-only App asks about Resources?	Notes
		Child Care				
Illinois	Y	SNAP, TANF, Medicaid, CHIP and GA	Y (expedited only)	N	N/A	combined app only asks for resources for SNAP applicants if applying for emergency benefits
Indiana*	Y	SNAP, TANF, Medicaid	Y	N	N/A	Does not have BBCE.
Iowa	Y	SNAP, TANF, Medicaid and Child Care	Y	Y	Y	Both combined app and SNAP only app ask about assets, including vehicles
Kansas*	Y	SNAP, TANF and Child Care	Y	N	N/A	Does not have BBCE. Have to do an online "self-assessment" before accessing applications; asks about resources (though I said I had $2300 in the bank and it determined I was not over resources to apply for SNAP; same when I said I had $3000; at $4000 said I "probably wouldn't qualify" but maybe still for TANF)
Kentucky	N	N/A	N/A	Y	Y	TANF and Medicaid combined app; SNAP only app asks about assets
Louisiana	Y	SNAP, TANF and Child Care	Y	N	N/A	Explains on DHS homepage that "Most households are exempt from the resource limit," then lists the exceptions that are still subject to the test. Paper application itself has no such disclaimer.

State	Combined Application with SNAP	Programs on Combined App	Combined App Asks about Resources for SNAP?	Separate SNAP-only Application?	SNAP-only App asks about Resources?	Notes
Maine	Y	SNAP, TANF, Medicaid and GA	Y	N	N/A	combined app still asks for assets for SNAP applicants; lists 13 categories and asks separately about vehicles
Maryland	Y	SNAP, TANF, Medicaid and GA	Y	N	N/A	combined app still asks for assets for SNAP applicants
Massachusetts	N	N/A	N/A	Y	N	SNAP only app says: "Note: Certain households, such as those with disqualified members, will be asked to provide information and verification of bank accounts and other assets."
Michigan*	Y	SNAP, TANF, Medicaid, CHIP, Child Care, and GA	Y	N	N/A	$5000 asset test
Minnesota	Y	SNAP, TANF, Medicaid, GA	Y	N	N/A	combined app still asks for assets for SNAP applicants
Mississippi	Y	SNAP, TANF	Y	N	N/A	asks about assets; very short application (2 pgs)
Missouri*	N	N/A	N/A	Y	Y	does not have BBCE
Montana	Y	SNAP, TANF, Medicaid	Y	Y	Y	SNAP only app asks about 18 categories of assets, including home of residence; combined app specifically asks about SNAP transfer of resources
Nebraska*	Y	SNAP, TANF, Medicaid, and Child Care	Y	N	N/A	$25,000 asset test

State	Combined Application with SNAP	Programs on Combined App	Combined App Asks about Resources for SNAP?	Separate SNAP-only Application?	SNAP-only App asks about Resources?	Notes
Nevada	Y	SNAP, TANF, Medicaid	Y	N	N/A	asks about assets for SNAP applicants in preliminary questions; later asks about 19 different assets, 9 different types of accounts and vehicles
New Hampshire	Y	SNAP, TANF, Medicaid, CHIP, Child Care and GA	Y	N	N/A	combined app still asks about assets for SNAP applicants
New Jersey	Y	SNAP, TANF, Medicaid and GA	Y	N	N/A	combined app still asks about assets for SNAP applicants, including vehicles
New Mexico	Y	SNAP, TANF, Medicaid and GA	Y	N	N/A	combined app still asks about assets for SNAP applicants; specifies that some assets, like the home, may not count
New York	Y	SNAP, TANF, Medicaid, Child Care and GA	Y	Y	Y	SNAP only application asks about assets, but has disclaimer: "Resources do not affect the eligibility of most households applying for Food Stamp Benefits. However, some resource information is used to determine if you qualify for expedited processing of your application."; combined app asks about 21 assets and vehicles with no disclaimer re: SNAP
North Carolina	N	N/A	N/A	Y	Y	SNAP only app asks about assets; asks for account

State	Combined Application with SNAP	Programs on Combined App	Combined App Asks about Resources for SNAP?	Separate SNAP-only Application?	SNAP-only App asks about Resources?	Notes
						numbers
North Dakota	Y	SNAP, TANF, Medicaid, CHIP and Child Care	Y	N	N	combined app still asks SNAP applicants about assets (26 categories + vehicles); recommends that all applicants but those for child care or CHIP bring or submit proof of assets
Ohio	Y	SNAP, TANF, Medicaid, and GA	Y	N	N/A	combined app has chart at the beginning about needed verification for each program; shows that proof of assets not needed for SNAP, though needed for TANF and Medicaid; application still has one question about assets for all
Oklahoma	Y	SNAP, TANF, Medicaid and Child Care	Y (expedited only)	N	N	only asks about assets for emergency benefits
Oregon	Y	SNAP, TANF, Medicaid and Child Care	Y	N	N/A	separate online app that requires setting up an account; combined app still asks about assets for SNAP applicants
Pennsylvania*	Y	SNAP, TANF, Medcaid, CHIP and GA	Y	N	N/A	$5500 asset test
Rhode Island	N	N/A	N	Y	Y	SNAP only app (23 pgs) asks about assets but with following disclaimer: "Agency Note: The questions below are only required for households with a member who has

State	Combined Application with SNAP	Programs on Combined App	Combined App Asks about Resources for SNAP?	Separate SNAP-only Application?	SNAP-only App asks about Resources?	Notes
						committed an Intentional Program Violation, households with members who are in a work sanction, and/or elderly and disabled households with gross income above 200% of the poverty level."
South Carolina	Y	SNAP and TANF	Y	N	N/A	Asks about resources for all applicants - two short questions
South Dakota*	Y	SNAP, TANF and Medicaid	Y	N	N/A	does not have BBCE
Tennessee*	Y	SNAP, TANF and Medicaid	Y	N	N/A	does not have BBCE
Texas*	Y	SNAP, TANF, Medicaid and CHIP	Y	N	N/A	online app no CHIP; $5000 asset test
Utah*	Y	SNAP, TANF, Medicaid, Child Care and GA	Y	N	N/A	does not have BBCE
Vermont	Y	SNAP, TANF, and Medicaid	?	N	N/A	Have to call to get a paper application; can't get to online application without creating account
Virginia*	Y	SNAP, TANF, Medicaid and GA	Y	Y	Y	does not have BBCE
Washington	Y	SNAP, TANF, Medicaid and GA	Y	N	N/A	online app has CHIP and Child Care; no GA; combined app asks about cash and bank accounts in preliminary questions, though does not designate it's just for expedited benefits; later resource question specifies asset info

State	Combined Application with SNAP	Programs on Combined App	Combined App Asks about Resources for SNAP?	Separate SNAP-only Application?	SNAP-only App asks about Resources?	Notes
						not needed for a range of programs, including "basic food"
West Virginia	Y	SNAP, TANF and Medicaid	Y	N	N/A	combined app (31 pgs) still asks all applicants about assets; 31 different types + vehicles
Wisconsin	Y	SNAP, TANF and Medicaid	?	Y	Y (expedited only)	online app is combined and only accessible by creating account; SNAP only application has section for assets but says "asset information is only needed if you are applying for emergency benefits."
Wyoming*	N	N/A	N/A	Y	Y	does not have BBCE

Select State Data - Asset Tests and Asset Poverty

State	SNAP Asset Test	TANF Asset Test	SNAP Error Rate (2010)	SNAP - State Admin Costs Per Case/ Month (2010)	SNAP Participation Rate (2009)	SNAP Participation Rate - Working Poor (2009)	Family Medicaid Test	Asset Poverty Rate (2009)	# SNAP Recipients (Avg FY 2011)	# TANF Recipients (Avg FY 2011)	TANF Asset Test as % of Asset Poverty Level	SNAP Asset Test as % of Asset Poverty Level
Alabama	None	None	3.75	$19.04	74%	66%	none	24.1%	920,365	56,495	n/a	n/a
Alaska	$2,000	$2,000	2.15	$66.70	74%	71%	$2,000	21.7%	86,044	10,045	43%	43%
Arizona	none	$2,000	6.69	$18.66	71%	62%	none	33.9%	1,067,617	41,395	43%	n/a
Arkansas	$2,000	$3,000	5.64	$28.41	73%	71%	$1,000	25.6%	486,451	18,437	65%	43%
California	none	$2,000	4.81	$78.57	53%	36%	$3,150	30.9%	3,672,980	1,474,923	43%	n/a
Colorado	none	none	3.18	$40.41	62%	48%	none	28.9%	453,103	30,668	n/a	n/a
Connecticut	none	$3,000	7.66	$28.62	75%	55%	none	24.9%	378,677	32,427	65%	n/a
Delaware	none	$10,000	1.52	$44.65	77%	66%	none	19.8%	134,927	15,696	216%	n/a
D.C.	none	$2,000	4.47	$39.19	86%	41%	none	41.3%	134,845	24,374	43%	n/a
Florida	none	$2,000	0.78	$11.64	69%	53%	$2,000	27.2%	3,074,671	98,854	43%	n/a
Georgia	none	$1,000	1.99	$15.86	74%	66%	$1,000	30.8%	1,780,039	37,201	22%	n/a
Hawaii	none	$5,000	3.04	$31.74	67%	51%	$3,250	18.7%	159,644	27,006	108%	n/a
Idaho	$5,000	$5,000	3.32	$18.13	70%	69%	$1,000	24.8%	228,629	2,850	108%	108%
Illinois	None	$2,000	1.7	$27.54	75%	56%	none	26.4%	1,793,886	83,012	43%	n/a
Indiana	$2,000	$1,000	2.6	$27.13	71%	72%	$1,000	26.2%	877,560	66,304	22%	43%
Iowa	None	$2,000	3.36	$24.52	86%	80%	$2,000	22.9%	373,856	44,553	43%	n/a
Kansas	$2,000	$2,000	4.79	$27.55	63%	51%	none	22.2%	298,642	38,451	43%	43%
Kentucky	None	$2,000	4.09	$22.40	81%	65%	$2,000	27.5%	823,472	63,073	43%	n/a
Louisiana	None	None	5.03	$27.45	77%	70%	none	23.6%	884,519	23,983	n/a	n/a
Maine	None	$2,000	3.49	$20.86	100%	99%	$2,000	24.1%	247,943	26,306	43%	n/a
Maryland	None	None	7.68	$30.85	70%	55%	none	20.2%	667,738	61,579	n/a	n/a
Massachusetts	None	$2,500	5.9	$19.94	75%	56%	none	26.4%	813,631	99,289	54%	n/a

State	SNAP Asset Test	TANF Asset Test	SNAP Error Rate (2010)	SNAP - State Admin Costs Per Case/ Month (2010)	SNAP Participation Rate (2009)	SNAP Participation Rate - Working Poor (2009)	Family Medicaid Test	Asset Poverty Rate (2009)	# SNAP Recipients (Avg FY 2011)	# TANF Recipients (Avg FY 2011)	TANF Asset Test as % of Asset Poverty Level	SNAP Asset Test as % of Asset Poverty Level
Michigan	$5,000	$3,000	3.31	$27.54	95%	95%	$3,000	25.9%	1,928,478	172,972	65%	108%
Minnesota	none	$2,000	4.76	$49.33	69%	54%	$10,000	22.5%	505,919	49,203	43%	n/a
Mississippi	none	$2,000	1.92	$20.26	71%	68%	none	31.9%	622,596	24,865	43%	n/a
Missouri	$2,000	$1,000	5.65	$21.12	88%	75%	none	24.3%	943,088	86,730	22%	43%
Montana	none	$3,000	4.12	$32.04	76%	79%	$3,000	26.1%	124,243	8,706	65%	n/a
Nebraska	$25,000	$4,000	3.52	$32.82	70%	61%	$6,000	23.5%	174,204	15,554	86%	540%
Nevada	none	$2,000	6.57	$23.95	61%	49%	$2,000	45.2%	332,959	27,662	43%	n/a
New Hampshire	none	$1,000	5.31	$25.40	73%	59%	$1,000	20.1%	113,407	10,604	22%	n/a
New Jersey	none	$2,000	4.62	$67.31	59%	46%	none	26.1%	759,136	83,753	43%	n/a
New Mexico	none	$3,500	4.5	$29.67	81%	82%	none	29.4%	414,275	52,395	76%	n/a
New York	None	$2,000	5.51	43.14	68%	58%	none	35.5%	2,999,991	278,139	43%	n/a
North Carolina	none	$3,000	2.7	$19.90	71%	64%	$3,000	27.6%	1,590,069	43,923	65%	n/a
North Dakota	none	$3,000	4.38	$45.29	76%	70%	none	20.0%	60,902	4,642	65%	n/a
Ohio	None	None	3.31	$24.31	79%	72%	none	27.3%	1,779,237	225,452	n/a	n/a
Oklahoma	none	$1,000	4.22	$31.78	75%	64%	none	26.9%	614,704	20,217	22%	n/a
Oregon	none	$2,500	4.88	$31.01	99%	89%	$2,500	28.2%	772,756	80,343	54%	n/a
Pennsylvania	$5,500	$1,000	3.93	39.42	83%	72%	none	20.6%	1,718,211	145,977	22%	119%
Rhode Island	none	$1,000	5.98	$21.37	68%	50%	none	21.8%	160,201	15,473	22%	n/a
South Carolina	none	$2,500	5.14	$9.73	83%	71%	$30,000	25.1%	844,405	41,944	54%	n/a
South Dakota	$2,000	$2,000	1.31	$28.26	78%	79%	$2,000	21.7%	101,817	6,814	43%	43%
Tennessee	$2,000	$2,000	4.39	$16.24	89%	74%	$2,000	25.8%	1,275,790	155,281	43%	43%

State	SNAP Asset Test	TANF Asset Test	SNAP Error Rate (2010)	SNAP - State Admin Costs Per Case/ Month (2010)	SNAP Participation Rate (2009)	SNAP Participation Rate - Working Poor (2009)	Family Medicaid Test	Asset Poverty Rate (2009)	# SNAP Recipients (Avg FY 2011)	# TANF Recipients (Avg FY 2011)	TANF Asset Test as % of Asset Poverty Level	SNAP Asset Test as % of Asset Poverty Level
Texas	$5,000	$1,000	2.13	28.02	62%	50%	$2,000	27.7%	3,977,273	112,777	22%	108%
Utah	$2,000	$2,000	4.33	42.51	63%	54%	$3,025	22.0%	283,971	15,167	43%	43%
Vermont	none	$2,000	6.59	$39.13	91%	86%	$3,150	15.7%	92,038	6,278	43%	n/a
Virginia	$2,000	none	5.87	42.73	70%	59%	none	20.9%	858,782	75,077	n/a	43%
Washington	none	$1,000	3.3	$20.33	91%	72%	$1,000	23.2%	1,054,693	148,777	22%	n/a
West Virginia	none	$2,000	7.14	$15.73	86%	90%	$1,000	18.7%	345,955	23,642	43%	n/a
Wisconsin	none	$2,500	1.97	$27.48	76%	75%	none	22.0%	801,073	61,745	54%	n/a
Wyoming	$2,000	$2,500	4.76	$76.90	59%	56%	none	20.9%	36,031	617	54%	43%

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