POLICY POINTS

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TEACHING PUBLIC BENEFIT RECIPIENTS HOW TO FISH: HOW ARKANSAS CAN LESSEN RELIANCE ON SNAP & TANF AND SUPPORT ECONOMIC INDEPENDENCE BY LIFTING ASSET LIMITS

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INTRODUCTION

In winter 2013, Southern Bancorp Community Partners' policy team authored a publication entitled, "Making the Case for Eliminating Asset Limits: Why Asset Limits Undermine Financial Security for Arkansans." The objective of the 2013 paper was to discuss key research findings on asset limits and offer recommendations for what and how Arkansas could change its current structure of asset testing on the Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF) program. This issue builds on the 2013 edition, strengthening the case made for why Arkansas should enact legislation to eliminate asset limits on both SNAP and TANF programs, largely based on findings from a 2014 Arkansas Department of Human Services (DHS) study.

Both SNAP and TANF are means-tested programs, requiring applicants to prove very limited income and resources for eligibility.* The examination of resources is a process is known as "asset testing." While the intention of asset testing is to ensure allocation of benefits to those most in need, the eligibility criteria can have negative impacts on the effectiveness of the program as a conduit to self-sufficiency. Asset limits were enacted to prevent wealthy people with considerable savings from receiving funds from anti-poverty programs, yet this scenario is extremely rare, largely due to income tests. Further, asset limits often have an adverse effect, deterring people from saving so that they can transition from government dependence to self-sufficiency and thus keeping them on public benefit programs.

In support of Southern's mission to create economic opportunity and promote financial security, the policy team worked to pass legislation (Act 535 of 2013) during Arkansas' 89th General Assembly that required the Arkansas Department of Human Services (DHS) to conduct a study on current asset limits for the SNAP and TANF programs.[1] While ample research shows the negative effects of asset limits, there was insufficient data specific to Arkansas. In summer 2014, DHS released the study to determine the effectiveness, consistency, and efficiency of program administration and to understand the potential implications of changing the current asset

KEY TAKEAWAYS

- ARKANSAS IS ONE OF ONLY FIFTEEN STATES THAT ENFORCES ASSET LIMITS ON ITS SNAP PROGRAM.
- LESS THAN 1 PERCENT OF ARKANSAS SNAP AND TANF APPLICATIONS ARE DENIED BECAUSE OF EXCESSIVE ASSETS.
- REMOVING ASSET LIMITS WOULD RESULT IN LESS GOVERNMENT SPENDING AND MORE ADMINISTRATIVE EFFICIENCY.
- TO MOVE ARKANSANS OFF PUBLIC BENEFITS, FAMILIES NEED TO BE ABLE TO SAVE TO BECOME FINANCIALLY INDEPENDENT.

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* Households that do not have a member over the age of 60 or living with a disability must first pass a Gross Income Test set at 130% of the Federal Poverty Limit (FPL). To pass the Gross Income Test, households must have income below 130% *before* any allowable deductions are subtracted.

Snapshot of Average Arkansas SNAP Household

Monthly income
$420

Monthly bills and expenses
$363

Money left over at end of month
$57

Household size
2.3 people

SNAP asset limit
$2,250

Arkansans receiving SNAP
About 1 in 4

Source: Arkansas Department of Human Services, 2014.

limits. The results were aligned with prior research findings: less than 1 percent of Arkansas SNAP and TANF applications are denied because of excessive assets. Asset limits actually discourage savings, discentivize maintaining a bank account, and may *increase* the duration of time a family is financially unstable and stays on public benefits.[2] By severely limiting a family's savings, asset limits increase the likelihood for family to remain on public benefits, increasing the duration of reliance on these programs which were designed to meet short-term need. Therefore, it is our position that asset limits on the SNAP and TANF programs should be eliminated in Arkansas.

BACKGROUND ON ASSET LIMITS

History

SNAP provides a nutrition safety net for low income children, families, and adults. In the most recent available data, over $734.6 million in benefits were provided to 693,564 people during State Fiscal Year (SFY) 2012. TEA (Transitional Employment Assistance) is Arkansas's program funded by the TANF block grant and maintenance of effort funds. The TEA program provides time-limited cash assistance each month to working low-income families with dependent children. Approximately 31,504 people received this benefit during SFY 2012. [3] Arkansas regulates TANF and assists in selecting policies for SNAP.

According to Arkansas's SNAP policy manual, "resources (assets) are defined as assets available to the household such as money in bank accounts, certificates of deposit, stocks, bonds, land, or houses that the household could sell." Vehicles are also considered to be resources, unless excluded for specific reasons allowable by policy. Some assets are totally excluded from consideration as resources, while others are considered inaccessible if a household can demonstrate the asset is not or will not likely become available. Households may not transfer resources to become eligible or remain eligible for SNAP benefit.[4] SNAP caseworkers review resources at a household's initial application and then again at time of recertification.† If a household exceeds the asset limit, its initial application will be denied or its existing case will be closed at recertification.

Table 1

Fast Facts on Arkansas Asset Limits	
SNAP asset limit	$2,250; $3,250 if household includes elderly or disabled members
TANF asset limit	$3,000 – excluded assets are one vehicle and IDAs
Type of categorical eligibility	Traditional – no SNAP asset test needed if one member of the household is a TEA recipient and/or if all household members are SSI recipients

Source: CFED, 2013.

† Certification periods are typically between 2-24 months depending on household income and the physical condition of household members. Most cases are reviewed at the 12 month mark.

Arkansas uses the federal government's guidelines for SNAP asset limits which is currently $2,250 per household or $3,250 if the household has an elderly or disabled member. Federal SNAP law provides two basic pathways for financial eligibility to the program: (1) meeting program-specific federal eligibility requirements; or (2) being automatically or "categorically" eligible for SNAP based on being eligible for or receiving benefits from other specified low-income assistance programs. Categorical eligibility eliminated the requirement that households who already met financial eligibility rules in one specified low-income program go through another financial eligibility determination in SNAP. In its traditional form, categorical eligibility conveys SNAP eligibility based on household receipt of cash assistance from SSI, the TANF block grant, or state-run General Assistance (GA) programs. Arkansas places an asset limit on TEA (TANF) recipients of $3,000.[5‡]

Arkansas has some of the strictest eligibility requirements throughout the country for its public benefit programs – it is one of only fourteen states that imposes asset limits on SNAP.[6] Eight states have removed asset limits on TANF.[6] The asset limits on its TANF and SNAP programs are not indexed for inflation.[§]

Further, both programs also have income limits, requiring households to pass a Gross Income Test set at 130 percent of the Federal Poverty Level. Although the Department of Workforce Services administers TANF, both TANF and SNAP are applied for through the Division of County Operations of the Department of Human Services to simplify the application process through its "traditional" categorical eligibility.[**]

In 2013, a family of four with a net worth less than $5,887 is considered "asset poor" – a figure far exceeding the current asset limits for both SNAP and TANF programs in Arkansas. This means that even recipients who save the maximum allowed under current asset limits are still asset poor and unlikely to be able to transition off of public benefits.

ARKANSAS IS ONE OF ONLY 14 STATES WITH ASSET LIMITS ON SNAP.

The state's asset poverty rate is 29 percent, meaning over a quarter of the population does not have sufficient net worth to subsist at the poverty level for three months in the absence of income.[7] This statistic aligns with the number of Arkansans receiving SNAP, which is approximately one in four persons. Further, the average Arkansas household receiving SNAP has only $57 remaining at the end of the month after paying for necessary expenses. In summary, the vast majority of Arkansas SNAP recipients are very poor and in great need of nutrition assistance. Hence, they do not have the funds saved, or to save, to reach the asset limit in the short term, making the asset limit irrelevant for them. But with asset limits in place caseworkers have to spend significant time and resources verifying applicants' limited or nonexistent assets.

An example of how asset limits negatively impact Arkansans' lives could be if a single mother suddenly loses her job, and is forced to spend down whatever she saved for her daughter's college education in a personal savings account to qualify for SNAP. Asset limits not only discourage the act of saving, but they also cost the state precious resources that could be more effectively and efficiently deployed in other ways that promote family self-sufficiency.

Effects of Asset Limits

1. Administrative burden for public benefit program caseworkers**.** Due to the great complexity of rules and exceptions attached to asset limits, the application evaluation process of asset confirmation can be extremely taxing and time-consuming for both the caseworker and the applicant. Clients must produce detailed financial records to complete the application process, providing extensive evidence they are in fact poor. Perhaps because of the complex eligibility requirements, more than two-thirds of payment errors in SNAP are made by the caseworker rather than the applicant. And in addition to checking for assets, caseworkers must also check for household income levels, verifying the poverty level of the household. Because of the limited resources program applicants have available to them, **eliminating asset limits decreases the amount of unnecessary paperwork and red tape, allowing caseworkers to reallocate their time on other more productive case management responsibilities**. Further, because

‡ States have been able to expand categorical eligibility beyond its traditional bounds. TANF gives states flexibility in meeting its goals since the 1996 welfare reform law, resulting in a wide variation of benefits and services offered among the states. SNAP allows states to convey categorical eligibility based on receipt of a TANF benefit.

§ While not indexed for inflation at the state level, the SNAP resource ceiling was raised from $2,000 to $2,250 by USDA in September 2014.

** Since July 2013, 43 jurisdictions have implemented what the U.S. Department of Agriculture refers to as "broad-based" categorical eligibility. In all but five of these jurisdictions, there is no asset test required for SNAP eligibility. Categorically eligible families bypass the regular SNAP asset limits. However, their net incomes must still be low enough to qualify for a SNAP benefit. Thus, it is possible to be categorically eligible for SNAP but have net income too high to actually receive a benefit. The exception to this is one- or two-person households that would still receive the minimum benefit.[**]

income limits exist, asset testing is not critical to ensure benefit recipients are those who need it most.

2. Cost to state government. Throughout the country, the administrative costs of regulating asset limits are rising due to continually increasing SNAP and TANF caseloads over the last five years. A 2012 study found that doing away with asset tests for SNAP in both Illinois and Ohio simplified the work, reduced the amount of verifications for applicants, and allowed workers more time to process other information regarding the assistance program.[8] Reducing the time and costs of administration is especially important during recession and economic downturns when the number of poor households needing SNAP benefits increases.[9] Evidence from states that have eliminated asset limits suggests that the administrative cost savings outweigh any real or potential increases in caseload. After Ohio and Virginia removed their asset limit for TANF, caseloads decreased in the subsequent years. Likewise, Louisiana, eliminated its asset limits on TANF in January 2009, and has not seen a substantial caseload increase. Other states, such as Oregon, found raising or eliminating their asset limits had an insignificant effect on caseload.[10] Thus, **the elimination of asset limits would result in less government spending in program administration.** This benefit is not seen by simply increasing the asset limits so eliminating them is the best option.[11]
3. Disincentive for households to save and maintain a bank account. Asset limits deter households from attaining and sustaining resources needed to endure an unexpected financial burden or transition off of public assistance. A 1997 study discovered that 49 percent of public benefit recipients stated they would save more if the government did not reduce their amount of assistance when their savings increased. Further, a 1999 study found a negative correlation between public benefit recipients and wealth accumulation after adjusting other variables including income and educational level.[12] In summary, the more resources one has, the less benefits he or she receives, causing one to be less motivated to save and remain on public benefit programs for the duration permitted.

   Further, some households choose to not have a bank account and avoid the financial mainstream because of the fear asset tests evoke. In Arkansas, 12.3 percent of households are unbanked. Nationally, over 70 percent of all unbanked households make less than $30,000 annually. To avoid having their bank accounts questioned by caseworkers, and to alleviate the concern they may not be eligible to receive public benefits, some low-income families decide to simply not have a bank account. Further, frequent bank fees may take away the resources public benefits may provide, thus causing another impediment to saving.[13]

   Perhaps because of limited financial literacy, financial products that are not tailored to low wealth families, or mistrust of banks, many families instead choose to keep their money at home or use alternative financial services, which impede saving and impose high interest rates or potentially detrimental loan terms that may cause borrowers to enter a perpetual debt cycle.[14] A 2006 study with TANF recipients in Maryland and Virginia showed evidence that applicants were afraid to keep a bank account because they did not want to jeopardize eligibility requirements, even though they likely would have met them.[15] Likewise, another study found bank account ownership was negatively linked to SNAP participation, irrespective of the account balance.[16] Hence, **the anxiety of asset testing may prevent some households from opening and sustaining a bank account, may reduce the likelihood of getting off of public benefits, and may keep them outside the financial mainstream.**[17]

SOUTHERN STATE CASE STUDY ON ASSET LIMIT REMOVAL: LOUISIANA

Arkansas, Tennessee, and Texas are the only three Southern states that have not eliminated their asset tests on SNAP. Further, Louisiana has removed the asset limit on its TANF programs as well, largely in an effort to improve and simplify their administrative process.

LOUISIANA

The leadership within the Department of Social Services was instrumental in eliminating the TANF asset test in Louisiana. The Assistant Secretary of the Louisiana Department of Social Services, Adren Wilson, championed the effort and drove the change home. Recognizing that accumulating and being able to pass assets on to the next generation is one key strategy for families to escape the cycle of poverty, he argued that rejecting a family's TANF application because of assets was counterintuitive to the agency's goal of promoting self-sufficiency. Furthermore, Wilson did not believe eliminating the asset test would impact caseloads, since few TANF applicants had substantial assets.

IF ARKANSAS WANTS TO REDUCE THE NUMBER OF PEOPLE ON SNAP AND TANF, THE STATE CANNOT PERPETUATE A CYCLE WHERE THOSE SERVICES BECOME THE NORM.

In July 2008, the Department of Social Services began holding Joint Application Design Sessions to discuss the impact the change would have on IT systems, along with larger programmatic implications. TANF administrators were particularly influenced by a cost-benefit analysis conducted by an outside contractor earlier that year. The analysis pointed out that the state's successful TANF-funded Individual Development Account (IDA) program was in direct conflict with the asset test. On the one hand, the state was encouraging families to save and accumulate assets through the IDA program; while on the other hand, families were being penalized for owning assets through the TANF asset test. After a number of design sessions, TANF administrators were convinced that eliminating the asset test would benefit families and streamline program rules.

In December 2008, at the request of Wilson and the Department of Social Services, the Louisiana Legislature repealed the revised statute, effectively eliminating the asset test. The change took effect on January 1, 2009. The state TANF Plan was subsequently amended to reflect the change. More than five years after the change, TANF administrators report that there has been little to no change in caseload.

Like Louisiana, Arkansas also has a state-funded IDA program through TANF. However, since Arkansas still has asset tests on its TANF program, the state still counts resources against applicants while encouraging them to save money to buy a house, start a business, or send their child to college through its IDA program.[††] The messages of asset testing and saving for an asset directly contradict each other; therefore, Arkansas should emulate neighboring state Louisiana and eliminate its asset test on TANF and SNAP through administrative or legislative means..

DHS ASSET LIMITS STUDY RESULTS

As required per Act 535 of 2013, the Arkansas Department of Human Resources (DHS) studied the state's asset limits on SNAP and TANF to determine their impact on the effectiveness, consistency, and efficiency of program administration and to understand the potential implications of changing asset limits. As stated earlier, DHS conducted this study because while there is existing literature detailing how asset limits negatively affect household financial security and how problematic asset limits are for government agencies, there was very little information tailored to Arkansas. Research from other states brought to light that most SNAP and TANF applicants have very limited amount of assets and, consequently, doing away with wealth calculations altogether would radically simplify program administration without substantially increasing caseload. The DHS study on asset limits confirmed that findings from other states also held true in Arkansas. In summary, removing asset limits would not open the floodgates for new applicants because most are in asset poverty already; rather, it reduces the amount of time, energy, and costs spent by public benefit program caseworkers, allows caseworkers to reallocate their time to other activities that promote economic independence, and encourages responsible financial practices.[18]

SNAP and TANF Applicants Denied Because of Asset Limits

Based on the DHS reporting of SNAP and TEA program applications and re-certifications, households completing an initial application or recertification to receive public benefits may be found ineligible if they exceed the resource limit for their household type. Denied applications for each month were averaged into four quarters for the period April 2013 through March 2014. All denials associated with resources were identified, counted for each period, and totaled. A percentage of denials associated with resources were also identified. As shown in Tables 2 and 3, the number of denied applications was also calculated to display the number of denials cumulatively over the 2013-2014 year.

Table 2

TEA (TANF) Denials

Denial Type	Apr-Jun '13	Jul-Sep '13	Oct-Dec '13	Jan-Mar '14	Cum. Apps. Denied
Excess resources	13	9	12	4	38
Failed to verify resources	0	6	3	1	10
Total apps. denied	5,197	6,097	4,195	4,339	19,828
% of denials	0.25%	0.25%	0.31%	0.12%	0.23%

Source: Arkansas Department of Human Services, 2014.

As shown in tables 2 and 3, the percentages of denied applicants for both SNAP and TANF are quite low (SNAP – 2.53 percent, TANF – 0.23 percent). However, the number of asset denied applicants against the number of total applications, equates to approximately 728 of 722,000 (0.1 percent) of total applications denied for SNAP and 48 of 52,000 (0.09 percent) total applications denied for TANF using the current process.[19]

[††] Arkansas currently excludes one vehicle and IDAs when testing assets for TANF.

Table 3

SNAP Denials					
Denial Type	**Apr-Jun '13**	**Jul-Sep '13**	**Oct-Dec '13**	**Jan-Mar '14**	**Cum. Apps. Denied**
Excess resources – real property	40	45	42	45	172
Excess resources – bank acct.	73	98	114	111	396
Excess resources - vehicle	10	9	12	5	36
Excess resource - combination	29	33	25	37	124
Total apps. denied	6,303	7,985	7,391	7,095	28,774
% of denials	2.41%	2.32%	2.61%	2.79%	2.53%

Source: Arkansas Department of Human Services, 2014.

Costs Associated with Verifying Asset Limits

According to DHS, the present eligibility system permits a caseworker to deny an application, or close a case, based on a specific code to include excess resources. Costs are allocated based on the amount of time a caseworker spends determining eligibility on a specific program, not the level of the actual eligibility factor that resulted in the closure or denial. Also, eligibility factors are processed sequentially, meaning if someone is ineligible based on their income, then the department never makes an assessment of the household's resources (assets). As a result, DHS reports that it cannot identify the value of departmental resources spent on verifying resources.[20]

Cost Implications of Changing or Eliminating Asset Limits

To train personnel on changing or eliminating asset limits, DHS stated the expected cost would be minimal. The policy change could be made known to staff through Computer Based Trainings and/or staff meetings. However, DHS stated a change to an eligibility system is much more complicated and costly, especially since the Division is currently transitioning from a Legacy Based system (ANSWER) to a new Eligibility and Enrollment Framework still under development. DHS also noted there are no funds in the SNAP budget to pay to reprogram the logic/rules engine to remove the resource component. Further, DHS has no funds to conduct an education campaign. If asset tests were eliminated, the department would have to try to work with advocacy groups and nonprofits to help educate potential clients.[21]

MOVING FORWARD WITH ASSET LIMIT REFORM

In response to key findings of the DHS study, listed below are policy recommendations for how to assist DHS and policymakers with eradicating asset limits on SNAP and TANF programs in Arkansas:

- Work with DHS administrators or policymakers to create a rule changes or legislation eliminating asset limits. Less than 1 percent of SNAP and TANF applications are denied due to excess resources, which means caseworkers are spending many hours checking for resources that very few applicants have. The only way to reduce the administrative burden of overseeing asset limit rules is to eliminate asset limits entirely. Removing asset limits comes with no cost, and could save Arkansas money in government administrative expenses and ultimately decrease the number of low-wealth families depending on public benefits, as seen in other states throughout the country. (Income limits and other eligibility factors would remain in place.) Moreover, 70 percent of states do not have asset limits on SNAP and/or TANF – this is far from a novel concept. Fellow southern states like Alabama and Louisiana have fully eliminated asset limits on SNAP and TANF (Mississippi has a limit of $2,000 only on TANF). As evidenced by states like Ohio and Virginia, SNAP and TANF caseloads have decreased since eradicating their asset limits. The complete removal of asset limits also sends the right message: public benefits are only to be used for short-term, necessary purposes, and saving and building assets will ensure financial security for the long term.

- Assist DHS on ensuring a smooth and successful process. DHS suggested that a change to their current eligibility system would be very costly and complicated. However, it is likely that a zero could simply be placed in the assets amount field of their new Eligibility and Enrollment Framework. Further, DHS also stated it cannot identify how much it costs for its caseworkers to test for assets. While Arkansas may not be able to determine the exact administrative costs of eliminating asset limits, research shows several other states have and have been quite successful in saving money. As mentioned earlier, a 2012 study found that doing away with asset tests for SNAP in both Illinois and Ohio simplified the work, reduced the amount of verifications for applicants, and allowed workers more time to process other information regarding the assistance program. The same study disclosed the Iowa Department of Human Services saved over $11.5 million through its SNAP program alone.[22] States that have recently done away with asset testing are yielding positive results; hence, the unknown for Arkansas's DHS should not prevent the state from lifting asset limits.

- Partner with fellow advocacy groups and nonprofits to spread the word. If Arkansas were to eliminate asset limits, it would only be the beginning; the abolishment of asset limits does not necessarily translate into increased savings by public benefit program recipients. As DHS noted regarding cost implications of changing or eliminating asset limits, the department would need assistance in delivering the message that asset limits no longer existed. It is important that area nonprofits and other government agencies join DHS and assist them by educating *current* public benefit program participants about the elimination of asset limits. (There is no need to focus on educating potential recipients.) In a 2006 study, public benefit recipients in Virginia believed personal saving was penalized in the TANF program, when in reality asset limits were not a requirement for program eligibility.[23] Low-income individuals and families must be made aware of what the eligibility requirements really are. The removal of asset limits will serve no purpose, let alone have a positive impact, if Arkansas's public benefit recipients believe they still exist.

CONCLUSION

This paper follow up on Southern's 2013 asset limits paper with the data and information found in the DHS report on asset limits, as a result of Act 535 of 2013. Based on the results from the DHS report, Arkansas now has the knowledge that less than 1 percent of SNAP and TANF applications are denied due to excess resources, meaning DHS caseworkers are required to spend many hours checking for resources that few applicants have. Further, 70 percent of states do not have asset limits on SNAP programs, and many of them eliminated their asset tests within the last several years. This signifies that the majority of state department heads and legislatures understand that the policy and practice of asset limits work against economic independence.[24]

Based on current policy, Arkansans must spend down whatever savings they have to qualify for SNAP or TANF, forcing them to fall back on public benefit programs again if faced with an unforeseen financial hardship. As illustrated in Southern's 2013 paper, Arkansas's current asset rules on TANF and SNAP prevent a person from advancing beyond a poverty or basic self-sufficiency level. The accumulation of assets leads to greater economic mobility by increasing current and future levels of income and by decreasing the variability of income and consumption. Buying a home, purchasing and maintaining a car to get to work, paying for college tuition or workforce training, starting a business, or planning for retirement all require savings. Household savings is paramount to financial stability; however, if a person receiving public benefits is penalized for saving, the future opportunity for economic mobility is virtually impossible.

However, if Arkansas moves forward with removing asset limits, it is equally as imperative that caseworkers and program participants know saving is encouraged and not penalized. The elimination of asset limits in Arkansas will only be effective and serve its purpose if public benefit recipients are aware asset limits do not exist

If Arkansas wants to decrease the number of people on SNAP and TANF, the state cannot perpetuate a cycle where those services become the norm. For various reasons, Arkansas should not want people to remain on public benefit programs; we should want to teach people to fish – teach them to save. Arkansas's public policies should enable financial security for families, not thwart prosperity. Arkansas has the authority to abolish asset limits on TANF and SNAP, which will promote asset building, save the government money on program administration, and potentially lessen the need for public benefit programs. For Arkansas's public benefit recipients to truly attain self-sufficiency, the government must promote positive financial behavior in its public benefit programs. Therefore, Arkansas should eliminate the asset limits on SNAP and TANF to achieve the real goal of those programs: economic independence.

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