



April 2019

## **A Guidebook for Military Families: Eligibility Criteria for SNAP; Women, Infants, and Children; and the Subsidized School Lunch Program**

Peggy Golfin, Danielle Angers, Chris Gonzales, Chris Petrillo, and Tom Geraghty

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**Abstract**

The 13th Quadrennial Review of Military Compensation’s (QRMC)’s Presidential charter directed the QRMC to “survey the usage of Supplemental Nutrition Assistance Program (SNAP) benefits, as well as any other supplemental sources of income or support you deem significant, by military members on active service and their families, and consider the results of the review in assessing the adequacy of overall military compensation.”

This guidebook describes basic eligibility criteria for SNAP; Women, Infants, and Children Program (WIC); and the subsidized school lunch program. It also contains information about how servicemember pay is treated for eligibility purposes.

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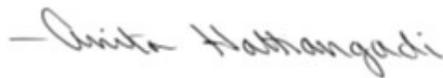
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**Approved by:**

**April 2019**



Anita U. Hattiangadi, Research Program Director  
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Resources and Force Readiness Division

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# A **GUIDEBOOK** for **MILITARY FAMILIES**



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Peggy Golfin, Danielle Angers, Chris Gonzales, Chris Petrillo, and Tom Geraghty

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This guidebook describes basic eligibility criteria for SNAP; the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC); and the National School Lunch Program (NSLP). It also contains information about how servicemember pay is treated for eligibility purposes.

### **This report was written by CNA's Resources and Force Readiness Division (RFR).**

RFR provides analytic support grounded in data to inform resource, process, and policy decisions that affect military and force readiness. RFR's quantitative and qualitative analyses provide insights on a full range of resource allocation and investment decisions, including those pertaining to manning, maintenance, supply, and training. Drawing on years of accumulated individual and unit data, as well as primary data collections, the RFR toolbox includes predictive data analytics, statistical analysis, and simulation to answer optimization and what-if questions, allowing military leaders to make better informed decisions.

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## Introduction

The 13th Quadrennial Review of Military Compensation's (QRMC)'s Presidential charter directed the QRMC to “survey the usage of Supplemental Nutrition Assistance Program (SNAP) benefits, as well as any other supplemental sources of income or support you deem significant, by military members on active service and their families, and consider the results of the review in assessing the adequacy of overall military compensation.”

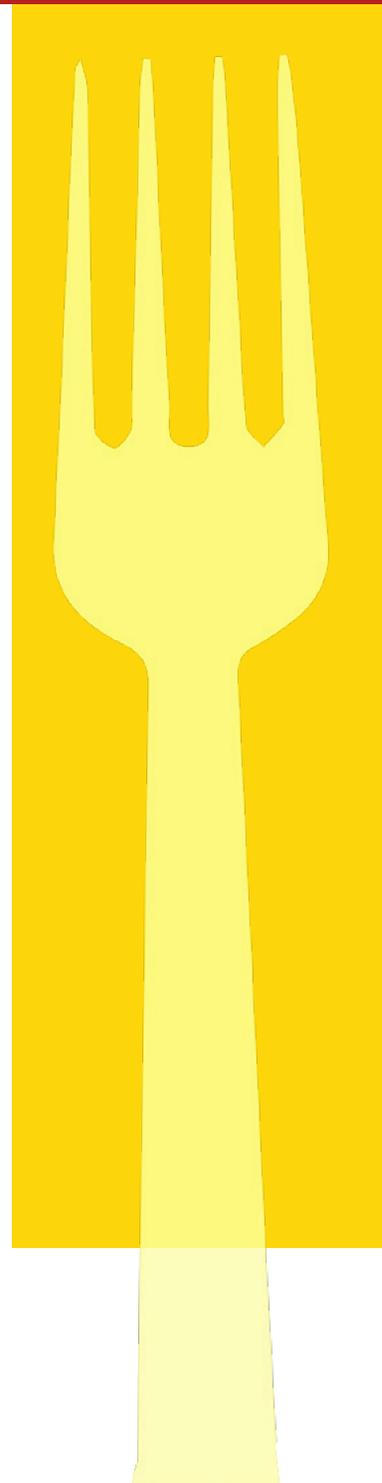
This guidebook describes basic eligibility criteria for **SNAP, the Special Supplemental Nutrition Program for Women, Infants, and Children Program (WIC)**, and the **National School Lunch Program (NSLP)**. It also contains information about how servicemember pay is treated for eligibility purposes.

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*Photo credit: Photos courtesy of the USDA's Food and Nutrition Service Supplemental Nutrition Assistance Program.  
Photo on page 8 by Sgt. Keegan Costello, US Army.*





## SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM (SNAP)



**SNAP** is a federal aid program providing low-income individuals and families with assistance for purchasing food. Formerly the Food Stamp Program, the initiative began in 1939 in response to high unemployment rates during the Great Depression [1]. The US Department of Agriculture's (USDA's) Food and Nutrition Service (FNS) administers the modern program, though states and territories distribute benefits [2]. Puerto Rico is the only jurisdiction that does not participate in SNAP; it has a Nutrition Assistance Program (NAP) that is funded with U.S. block grants [3].

### GENERAL ELIGIBILITY

SNAP eligibility is based on a household's gross income, net income, and assets. For the purpose of SNAP, households are defined as people who live and eat meals together, regardless of whether they are related or have a legal obligation to support one another [2].

Depending on location, households are screened for eligibility based on either federal guidelines, or automatic approval—that is, being eligible for or receiving benefits from a number of other assistance programs, such as Supplemental Security Income (SSI), Temporary Assistance for Needy Families (TANF), or state-run programs. The latter eligibility standard is referred to as Broad Based Categorical Eligibility (BBCE). According to a recent Congressional Research Service report, 39 states, the District of Columbia (DC), Guam, and the Virgin Islands had implemented BBCE as of February 2018 [4].

## Federal guidelines

States that follow the federal guidelines require gross household income to be no more than 130 percent of the federal poverty line, which varies with the number of household members and is higher for residents of Alaska and Hawaii. Households with an elderly (defined as age 60 or older) or disabled member are not subject to the gross income requirement [2].

Income is defined as all earned and unearned income, including wages, salaries, cash assistance, Social Security, unemployment insurance, and child support [5].

Table 1 displays fiscal year (FY) 2018 federal poverty income levels by state and number of household members.<sup>1</sup> The gross income limit is derived by calculating 1.3 times the values in this table. For instance, households in the 48 contiguous states with 4 members must have no more than \$2,719 (\$2,092 times 1.3) in monthly income.

**Table 1. FY 2018 federal monthly poverty level income**

Household members	48 contiguous states and DC	Alaska	Hawaii
1	\$1,012	\$1,265	\$1,134
2	\$1,372	\$1,715	\$1,578
3	\$1,732	\$2,165	\$1,992
4	\$2,092	\$2,615	\$2,406
5	\$2,452	\$3,065	\$2,820
6	\$2,812	\$3,515	\$3,235
7	\$3,172	\$3,965	\$3,649
8	\$3,532	\$4,415	\$4,063
Per additional person	\$360	\$450	\$415

Source: [6]

Net income is derived by subtracting the following items from gross income:

1. 20 percent of gross income
2. A standard deduction that is based on household size
3. Dependent care expenses if they are needed for work, training, or education
4. Medical expenses for elderly or disabled members if they exceed \$35 per month and are not paid by insurance or someone else
5. In some states, child support payments
6. Excess shelter costs, defined as costs associated with the household's shelter that exceed half of its income after deductions 1–5 are made

<sup>1</sup> As we explain later, our study does not include United States territories, so we reference information pertaining to states and DC only.

Table 2 provides the standard deductions permitted by location and household size.

**Table 2. FY 2018 SNAP standard deductions**

Household members	48 states and DC	Alaska	Hawaii
1–3	\$160	\$273	\$225
4	\$170	\$273	\$225
5	\$199	\$273	\$229
6+	\$228	\$285	\$263

Source: [7]

Shelter costs include fuel to heat and cook, electricity, water, telephone, rent or mortgage (and interest), and taxes on the home. According to the USDA [8], 46 states and DC have mandatory Standard Utility Allowances (SUAs) that all households must use as part of their estimated shelter costs.

The monthly excess shelter deduction is capped at \$535 for all locations with four exceptions: (1) Alaska residents are capped at \$854, (2) Hawaii residents are capped at \$720, (3) Guam residents are capped at \$627, and (4) Virgin Island residents are capped at \$421 [9].

In addition to meeting these income and asset requirements, household members who are able-bodied adults without dependents (defined as 18- to 49-year olds with no dependents who are not disabled) may receive only three months of benefits in a three-year period unless they meet certain exceptions. These exceptions include any of the following [10]:

- They work at least 80 hours per month.
- They participate in a qualified education and training program, for at least 80 hours per month.
- They comply with a workfare program which may include unpaid work through a special state-approved program. The amount of time worked depends on the amount of benefits received each month.

## Guidelines for states with BBCE

According to the Congressional Research Service, states that have implemented BBCE apply a flexible definition of eligibility [4]. For instance, household members do not have to be receiving TANF cash benefits; they may instead qualify for SNAP if they qualify for a TANF-funded benefit or service, such as receiving a brochure or telephone referral for services. In practice then, all households in the state qualify for SNAP if they satisfy the state-set gross income limit (which ranges between 130 and 200 percent of the federal poverty level) and asset thresholds, one or both of which are higher than the federal standard. Further, in all but five BBCE states and territories, there is no asset limit. However, all BBCE states use the federal formula for calculating net income and adhere to the federal net income limit of 100 percent of the poverty line.

Information for each state and DC, including whether they have implemented BBCE, their gross income limits, and their asset criteria, can be found in the appendix on page 10.

# MONTHLY BENEFITS

Households are expected to spend 30 percent of their net monthly income on food. The amount of benefit they receive is the difference between the maximum amount for that number of people in the household and their 30 percent contribution. Table 3 shows the maximum benefit per household members and location. For instance, a household of four in one of the contiguous states with a net income of \$1,000 per month would be expected to contribute \$300 toward food. Its maximum benefit is \$640, so it would receive \$340 in monthly SNAP benefits.

**Table 3. FY 2018 SNAP maximum monthly benefits**

Household members	48 states and DC	Alaska			Hawaii
		Urban	Rural 1	Rural 2	
1	\$92	\$230	\$293	\$357	\$358
2	\$352	\$422	\$538	\$655	\$657
3	\$504	\$604	\$771	\$938	\$941
4	\$640	\$767	\$979	\$1,191	\$1,195
5	\$760	\$911	\$1,162	\$1,415	\$1,419
6	\$913	\$1,094	\$1,395	\$1,698	\$1,703
7	\$1,009	\$1,209	\$1,542	\$1,876	\$1,883
8	\$1,153	\$1,382	\$1,762	\$2,145	\$2,152
Per additional person	\$144	\$173	\$220	\$268	\$269
Minimum (1-2 people)	\$15	\$18	\$24	\$29	\$29

Source: [7]

Each month during the period of October 2017 through August 2018, an average of 20.1 million households, representing an average of 40.4 million people, received SNAP benefits. The average monthly benefit each household received was \$252.07, while the average monthly benefit per person was \$125.43 [11].



## SPECIAL SUPPLEMENTAL NUTRITION PROGRAM FOR WOMEN, INFANTS, AND CHILDREN (WIC)



**The WIC** Program provides pregnant and postpartum women, infants, and children under five with supplemental food, health care referrals, and nutrition education. WIC is a federal grant program administered by the Food and Nutrition Service (FNS) under the United States Department of Agriculture (USDA) [12].

Women and children are categorically eligible—that is, they qualify automatically—if their families are already receiving SNAP or TANF benefits, or if certain members of the family receive Medicaid benefits. If not categorically eligible, applicants can also qualify if their income is between 100 percent and 185 percent of the federal poverty level.

Applicants must also be determined to be at nutritional risk by a medical health professional. Nutritional risk can be based on medical standards, which require the applicant’s height, weight, and blood test to show that the applicant is anemic or underweight. Pregnant women who have experienced problems with past pregnancies can also be deemed a medical risk.

Applicants are at dietary risk if they do not practice proper nutrition or feeding techniques or if they fail to meet the Dietary Guidelines for Americans[13].

According to the USDA, each month during FY 2018 saw an average of 6.8 million participants in WIC, with an average of \$40.70 spent per participant each month [14].



## NATIONAL SCHOOL LUNCH PROGRAM (NSLP)



**NSLP** is an assistance program providing free and reduced-priced meals to qualified students in public and nonprofit private schools, as well as some residential child care institutions. State agencies administer the program through the Food and Nutrition Service (FNS) under the United States Department of Agriculture (USDA) [15]. States receive subsidies from the federal government under the condition that schools provide free and reduced-price meals that meet nutritional standards. The standards include offering the appropriate amounts of fruits, vegetables, whole grains, meats or alternative proteins, milk, and sodium for the students based on their age. Subsidies are higher for Alaska, Hawaii, and Puerto Rico because of higher food costs [16].

Children can qualify for free or reduced-priced lunches in several ways. They are automatically eligible if their families are already receiving SNAP or TANF benefits, or if they are labeled as migrants, homeless, runaways, or foster children. They can also qualify automatically by participating in a federally funded Head Start program or comparable state-run, pre-kindergarten program.

If a child's family does not receive these benefits, he or she can still qualify based on family income. Children in families with income at or below 130 percent of the federal poverty level qualify for free lunches. Children with family income from 130 percent to 185 percent of the federal poverty level qualify for reduced-priced lunches, which cannot cost more than 40 cents [17].

The USDA Research Service estimates that each day, over 30.4 million children participate in the National School Lunch Program, at an annual cost of \$13.6 billion [18].



## HOW MILITARY PAY IS TREATED



With only a few exceptions, all military compensation is considered to be income for SNAP purposes. The only exceptions are specified in Chapter 5 of Title 37 United States Code, and they include income that is received as a result of a servicemember's deployment to or service in an area designated as a combat zone as determined pursuant to an executive order or public law, and not received by the servicemember prior to his or her deployment or service in a federally designated combat zone [19].

### BASIC ALLOWANCE FOR HOUSING

The Basic Allowance for Housing (BAH) compensates uniformed military servicemembers who live in military installation housing maintained by a private-sector company or in offbase civilian housing for housing costs comparable to local civilian housing markets [20].

The nontaxable allowance varies by duty station location, paygrade, and dependency status [21]. Allowances are recalculated annually based on local rental markets, accounting for average utility fees. Homeownership costs, such as mortgage and property taxes, are not factored into the calculations. BAH distinguishes between servicemembers with dependents and those without dependents (not the number of dependents). As long as a member's location, rank, and dependency status remain the same, his or her allowance can only be increased [22].

Members who live in government-owned military installation housing do not pay rent or utilities and therefore do not receive BAH. Their rent-free government-owned housing is referred to as an in-kind benefit. According to United States Code (Title 7, Subtitle B, Chapter 11, Subchapter C, Part 273, Subpart D, section 273.9), any gain or benefit that is not in the form of money payable directly to the household (including in-kind benefits, defined as benefits for which no monetary payment is made on behalf of the household, including meals, clothing, housing, or produce from a garden) is exempt from income for SNAP eligibility purposes. As a result, these members receive the same type of housing benefit but are more much likely to qualify for SNAP relative to their peers who receive BAH.

## BASIC ALLOWANCE FOR SUBSISTENCE

The Basic Allowance for Subsistence (BAS) is a nontaxable allowance designed to offset costs for a servicemember's meals only, not the cost of food for any dependents. The 2019 monthly rates for BAS are \$254.39 for officers and \$369.39 for enlisted members [23]. If a member is receiving BAS, he or she must pay for meals even when provided by the US government. In general, officers receive full BAS at all times and are required to pay for all meals. Enlisted members in basic training or on sea duty do not receive BAS and pay nothing to eat, a practice referred to as subsisted in kind [24].

Typically, individuals are not eligible for SNAP if an institution provides most of their meals, which would include many E-1s.

## COST OF LIVING ALLOWANCE

The Cost of Living Allowance (COLA) helps to offset high costs of living in continental US locations that exceed average costs by 8 percent or more [25]. This is a taxable allowance based on ZIP code that affects about 28,000 servicemembers. Like BAH, this allowance distinguishes between members with and without dependents [26].

## Appendix: State SNAP Eligibility Criteria

Table 4 contains information on state-specific eligibility criteria, including whether a state uses a BBCE criteria, gross income limits, SUA rules, and asset limits.

**Table 4. State SNAP criteria**

State	BBCE	Gross Income limit (% of federal poverty line)	Asset limit	Vehicles included
AL	Yes	130	(a)	No
AK	No	130	Federal standard	At least one exempt
AZ	Yes	185	No limit	No
AR	No	130	Federal standard	At least one exempt
CA	Yes	200	No limit	No
CO	Yes	130	(a)	No
CT	Yes	185	No limit	No
DE	Yes	200	No limit	At least one exempt
FL	Yes	200	No limit	No
GA	Yes	130	(a)	No
HI	Yes	200	No limit	No
ID	Yes	130	\$5,000	At least one exempt
IL	Yes	165	(a)	No
IN	No	130	Federal standard	No
IA	Yes	160	No limit	At least one exempt
KS	No	130	Federal standard	At least one exempt; fair market value over \$4,650 included
KY	Yes	130	(a)	No
LA	No	130	Federal standard	No
ME	Yes	185	\$5,000	At least one exempt
MD	Yes	200	No limit	No
MA	Yes	200	(a)	No
MI	Yes	200	\$5,000	First vehicle exempt, others over \$15,000 value counted
MN	Yes	165	No limit	No
MS	Yes	130	No limit	No
MO	No	130	Federal standard	No
MT	Yes	200	No limit	No
NE	Yes	130	\$25,000	At least one exempt
NE	Yes	130	\$25,000	At least one exempt
NV	Yes	200	No limit	At least one exempt

State	BBCE	Gross Income limit (% of federal poverty line)	Asset limit	Vehicles included
NH	(b)	185	No limit	At least one exempt
NJ	Yes	185	No limit	No
NM	Yes	165	No limit	No
NY	(c)	200 with dependent care expenses, \$150 otherwise	(a)	No
NC	Yes	200	No limit	No
ND	Yes	200	No limit	Federal standard
OH	Yes	130	(a)	No
OK	Yes	130	No limit	No
OR	Yes	185	No limit	At least one exempt
PA	Yes	160	(a)	At least one exempt
RI	Yes	185	(a)	At least one exempt
SC	Yes	130	(a)	At least one exempt
SD	No	130	Federal standard	At least one exempt
TN	No	130	Federal standard	No
TX	Yes	165	\$5,000	Excludes one vehicle up to \$15,000, includes excess vehicle value
UT	No	130	Federal standard	No
VT	Yes	185	No limit	At least one exempt
VA	No	130	Federal standard	No
WA	Yes	200	No limit	At least one exempt
WV	Yes	130	No limit	No
WI	Yes	200	No limit	No
WY	No	130	Federal standard	Federal standard
DC	Yes	200	No limit	No

Sources: [4], [8], [27], and [28]

<sup>a</sup> No limit: a household with an elderly/disabled member with an income over 200% of poverty faces \$3,500 limit.

<sup>b</sup> Household with at least one dependent child.

<sup>c</sup> Household with dependent care expenses or with earned income.

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## Abbreviations

<b>B BCE</b>	Broad Based Categorical Eligibility
<b>BAH</b>	Basic Allowance for Housing
<b>BAS</b>	Basic Allowance for Subsistence
<b>COLA</b>	Cost of Living Allowance
<b>DC</b>	District of Columbia
<b>DMDC</b>	Defense Manpower Data Center
<b>FNS</b>	Food and Nutrition Service
<b>FY</b>	Fiscal Year
<b>MHA</b>	Military Housing Area
<b>NAP</b>	Nutrition Assistance Program
<b>QRMC</b>	Quadrennial Review of Military Compensation
<b>SNAP</b>	Supplemental Nutrition Assistance Program
<b>SSI</b>	Supplemental Security Income
<b>SUA</b>	Standard utility allowance
<b>TANF</b>	Temporary Assistance for Needy Families
<b>USDA</b>	United States Department of Agriculture





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