



Supplemental Nutrition Assistance Program (SNAP) and Military Families: Who Qualifies and Where?

Peggy Golfin and Danielle Angers with Chris Gonzales

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Abstract

The Director of the 13th Quadrennial Review of Military Compensation (QRMC) asked CNA to determine state and District of Columbia eligibility requirements for Supplemental Nutrition Assistance Program (SNAP) benefits, to identify which military allowances and in-kind benefits count toward eligibility, and to estimate the number of active component servicemembers who would be eligible for SNAP. We were also asked to estimate the number of servicemembers serving in the United States who would be eligible for the Family Subsistence Supplemental Allowance (FSSA) if it were reinstated for those servicemembers. We found that no servicemember without dependents would qualify for SNAP in any Military Housing Area (MHA) and that no servicemember with dependents above the paygrade of E-7 would qualify. While fewer in numbers, members who live on base and receive quarters-in-kind (that is, they do not receive Basic Allowance for Housing) are far more likely to be eligible for SNAP than their peers who have dependents and do not live on base because the in-kind benefit is not considered income for SNAP purposes. We estimate that far fewer servicemembers would be eligible for FSSA if it were made available in the United States because the value of quarters provided in-kind is imputed as income when determining eligibility for FSSA.

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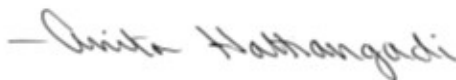
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Approved by:

September 2020



Anita Hattiangadi, Research Program Director
Marine Corps Defense & Workforce Program
Resources & Force Readiness Division

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Executive Summary

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. [1]

SNAP is a federal program that helps low-income individuals and families purchase food. The amount of the assistance depends on household size, household income, and other circumstances.

The Director of the 13th QRMC asked CNA to determine state and District of Columbia (DC) eligibility requirements for SNAP, to identify which military allowances and in-kind benefits count toward eligibility, and to estimate the number of active component servicemembers who would be eligible for SNAP in each state and Military Housing Area (MHA). We were also asked to estimate the number of servicemembers serving in the United States who would be eligible for the Family Subsistence Supplemental Allowance (FSSA) if it were reinstated for those servicemembers. FSSA was established in 2001 to eliminate the need for SNAP benefits for servicemembers, but it was discontinued in 2016 for members serving in the United States, Puerto Rico, the U.S. Virgin Islands, or Guam. We summarize our findings below.

SNAP guidelines

SNAP eligibility criteria are based on households' gross income, net income, and asset limits. Households are defined as people who live and eat meals together, even if they are not dependents in the Defense Enrollment Eligibility Reporting System (DEERS).¹

States have the option of using federal guidelines for screening households, or they may use a Broad-Based Categorical Eligibility (BBCE) criterion that has more generous gross income and/or asset limits than the federal guidelines. As of February 2018, 39 states, DC, Guam, and the Virgin Islands have implemented BBCE. All states, however, must adhere to the federal net

¹ Puerto Rico does not participate in the SNAP program; instead, it has a Nutrition Assistance Program (NAP) that is funded with U.S. block grants [2].

income limit, which, after certain allowable deductions are made, must be no more than 100 percent of the federal poverty line for that number of household members.

We used data provided by the Defense Manpower Data Center (DMDC) and the QRMC regarding the amount of basic pay, Basic Allowance for Subsistence (BAS), Basic Allowance for Housing (BAH), Cost-of-Living Allowance (COLA), and the number of servicemembers and their dependents in each MHA² and paygrade to estimate the total number of members who would qualify for SNAP based on the following assumptions:

- The household had no other income source.
- The household had no child care or child support payments.
- There were no elderly or disabled members in the household (these households are not subject to the gross income requirement).
- The household met asset limits.
- The number of household members equaled the number of dependents plus the servicemember.
- We use the amount of BAH that servicemembers receive as the best estimate of rent or mortgage payments, which are used in calculating deductions from gross income.

These assumptions are necessitated by the lack of more detailed information, but they render our results less precise. For instance, many servicemembers receive special pays and/or assets that would make them ineligible for SNAP. The more servicemembers there are who violate our assumptions, the more we overestimate the number who are eligible. In contrast, there may be many servicemembers who live with others who are considered household members for the purpose of SNAP but are not military dependents, such as those who live with significant others and any nondependent children. Many of these servicemembers could be eligible for SNAP based on a larger household size than we use to calculate their eligibility.

SNAP results

We found that it would not be possible for any servicemember who does not have dependents to qualify for SNAP in any MHA or paygrade. Given data on the current composition of members serving in the United States, we estimate that 1,929 members would qualify for SNAP benefits. None of these servicemembers are above the paygrade of E-7, and about half (903) are E-1 through E-3. Junior members who qualify for SNAP would be eligible for only a period of a few months to perhaps one or two years due to promotions.

² Servicemembers serving in U.S. territories do not have unique MHAs. For instance, an MHA may include areas within Guam and the Virgin Islands. Consequently, we are not able to include U.S. territories in our calculations.

All servicemembers either receive BAH and live outside military installations, receive BAH and live in government privatized housing, or do not receive BAH because they receive quarters-in-kind, such as barracks, ships, or legacy government housing. Few servicemembers with dependents do not receive BAH—less than 1 percent. These members with dependents are more likely to qualify for SNAP relative to their peers who receive BAH (10 percent and 0.4 percent, respectively) because BAH counts as income but quarters-in-kind does not. This may lead to unequal SNAP eligibility for servicemembers who are otherwise similar in terms of paygrade, geographic location, and number of household members.

The total annual amount of SNAP benefits these servicemembers would qualify for is \$3.1 million, and the annual amount of compensation they would require to make them no longer eligible for SNAP is \$5.6 million.

Family Subsistence Supplemental Allowance guidelines

There are several important differences in how eligibility is calculated for FSSA relative to SNAP. In particular, (1) income limits are restricted to gross household income (i.e., assets and deductions are not considered), (2) the in-kind benefit that servicemembers receive who live on base and do not receive BAH is considered income and is therefore given a monetary value (equal to the amount of BAH that servicemembers would be eligible for if they did receive BAH), and (3) the amount of the incentive is calculated as the difference between 130 percent of the federal poverty income level for a given household size and a servicemember's total household income. The incentive is capped at \$1,100 per month [3].

Similar to SNAP, our estimates of the number of servicemembers who would be qualified for FSSA if the incentive were reinstated for members serving within the United States assume that the household has no other source of income besides basic pay, BAH, BAS, and COLA, and we assume that the household consists of the servicemember and military dependents only.

FSSA results

We estimate that far fewer servicemembers would be eligible for FSSA. Specifically, we determined that 578 servicemembers serving in the 50 states and DC would qualify for FSSA, only 4 of whom do not receive BAH, and all are in paygrades E-1 to E-5 and have a minimum of five household members. The total annual cost of FSSA for these members would be \$2.6 million annually.

Summary

Our analysis highlights the fact that, based on our assumptions, the total monthly amount of SNAP benefits that servicemembers would receive (\$259,016) is far less than the amount of additional compensation that SNAP-eligible servicemembers would require to make them no longer eligible for SNAP (\$464,600). The difference in these costs is a function of (1) the SNAP requirement that households must contribute 30 percent of net income toward food and (2) the types of deductions allowed from gross income to derive net income. In addition, because their quarters are considered to be in-kind compensation and, as such, do not count toward SNAP income limits, servicemembers who do not receive BAH are far more likely to qualify than their peers in the same MHA who do receive BAH.

Because FSSA monetizes the in-kind benefit of BAH, if FSSA were reinstated for those serving within the United States, servicemembers who do not receive BAH would be less likely to qualify for FSSA than for SNAP. In addition, many servicemembers who would not receive FSSA, as well as some of those who would, would still be eligible for SNAP benefits. There are three reasons why this is possible. First, since FSSA is capped at \$1,100, the incentive would still leave household income below 130 percent of the federal poverty level for some households. Second, many states set their maximum household gross income above 130 percent; some are as high as 200 percent of the federal poverty level. And, third, many servicemembers who do not receive BAH would be eligible for SNAP but not for FSSA because of the value of their in-kind benefit.

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Introduction

The Presidential charter of the 13th Quadrennial Review of Military Compensation (QRMC) 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. [1]

The Director of the 13th QRMC asked CNA to do the following:

- Determine state and District of Columbia (DC) eligibility requirements for SNAP.
- Identify which military allowances and in-kind benefits count toward eligibility.
- Estimate the number of active component servicemembers who would be eligible for SNAP in each state and Military Housing Area (MHA).
- Estimate the cost of providing SNAP benefits to these servicemembers.

We were also asked to calculate the last two metrics for Family Subsistence Supplemental Allowance (FSSA) in the event of the incentive being reauthorized for servicemembers serving within the United States.

This document presents our findings. We begin with a description of SNAP and FSSA eligibility rules, followed by an explanation of how certain military allowances are treated for SNAP purposes. We then provide a description of our SNAP methodology and findings, followed by our FSSA methodology and findings. Our last section summarizes our key findings.

SNAP and FSSA

Supplemental Nutrition Assistance Program

SNAP is a federal aid program providing low-income individuals and families with assistance purchasing food. Formerly known as the Food Stamp Program, the initiative began in 1939 in response to high unemployment rates during the Great Depression [4]. The U.S. Department of Agriculture's Food and Nutrition Service administers the modern program, though benefits are distributed by the states and territories. Puerto Rico is the only jurisdiction that does not participate in the SNAP program; it has a Nutrition Assistance Program that is funded with U.S. block grants [2].

General eligibility

SNAP eligibility is based on households' gross income, net income, and assets. For the purpose of SNAP, households are defined as people who live and eat meals together, even if they are not dependents in the Defense Enrollment Eligibility Reporting System (DEERS) [5].

Depending on location, households are screened for eligibility based on either federal guidelines or automatic approval by being eligible for or receiving benefits from 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, DC, Guam, and the Virgin Islands have implemented BBCE as of February 2018 [6].

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 member (defined as age 60 or older) or a disabled member are not subject to the gross income requirement [5].

Income is defined as all earned and unearned income, including wages, salaries, cash assistance, Social Security, unemployment insurance, and child support [7]. Assets, referred to as countable resources, are capped at \$2,250 or, if at least one member of the household is elderly or disabled, at \$3,500. Certain assets are not counted, such as a home and lot; states determine how vehicles are treated [5].

Table 1 displays FY 2018 federal poverty income levels by state and household members. As we explain later, our study does not include U.S. territories, so we reference information pertaining to states and DC only. The gross income limit is derived by calculating 1.3 times the values in this table. For instance, households with four members living in the 48 contiguous states must have no more than \$2,719 (\$2,092 times 1.3) in monthly income.

Table 1. FY 2018 federal monthly poverty level income

Number of 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: [8].

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 through 5 are made

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

Table 2. FY 2018 SNAP standard deductions

Number of household members	48 contiguous states and DC	Alaska	Hawaii
1 to 3	\$160	\$273	\$225
4	\$170	\$273	\$225
5	\$199	\$273	\$229
6+	\$228	\$285	\$ 263

Source: [9].

Shelter costs include fuel for heating and cooking, electricity, water, telephone, rent or mortgage and interest, and taxes on the home. According to USDA [10], 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 the following exceptions [11]:

- Alaska residents are capped at \$854.
- Hawaii residents are capped at \$720.

In addition to meeting these income and asset requirements, household members who are able-bodied adults without dependents (ABAWDs), 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 [12]:

- They work at least 80 hours per month.
- They participate in a qualified education and training program 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.

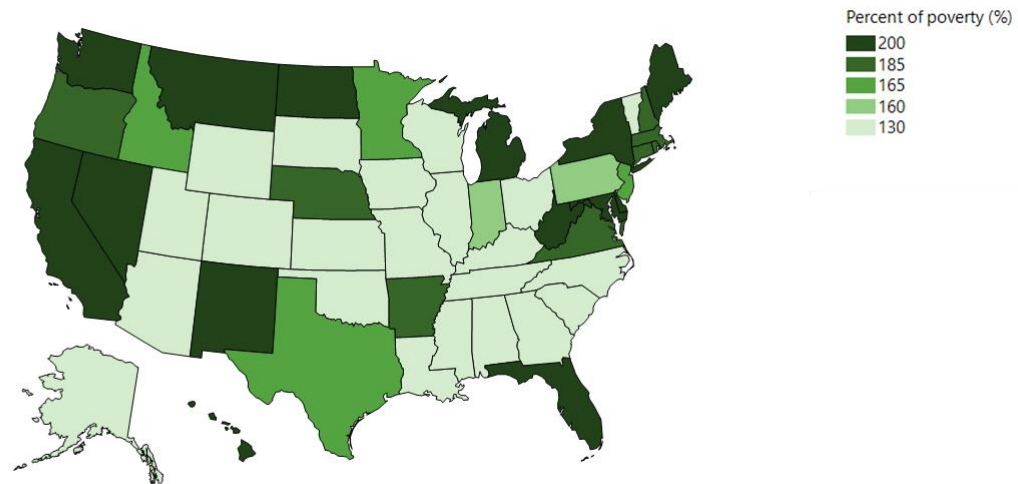
Guidelines for states with BBCE

According to the Congressional Research Service [6], states that have implemented BBCE apply a flexible definition of eligibility. 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/territories, there is no asset limit.

All states, including those with BBCE, use the federal formula for calculating net income and adhere to the federal net income limit of 100 percent of the poverty line.

Appendix A provides information for each state and DC on whether they have implemented BBCE, their gross income limits, asset criteria, and SUAs. In Figure 1, we display the maximum gross income limit in each state and DC. For reference, the gross income limit is 130 percent of the federal poverty line in 22 states, and 14 states plus DC cap gross income at 200 percent of federal poverty for the purpose of SNAP eligibility.

Figure 1. SNAP gross income limits in each state: Percentage of federal poverty



Source: Publicly available SNAP policy information.

Monthly benefits

SNAP guidelines require households to spend 30 percent of their net monthly income on food. The amount of SNAP 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 benefits by household members and locations. For instance, a household of four in one of the contiguous states that had a net income of \$2,000 per month would be expected to contribute \$600 toward food. Its maximum benefit is \$640, so it would receive \$40 in monthly SNAP benefits.

Table 3. FY 2018 SNAP maximum monthly benefits

Number of household members	48 states and DC	Alaska Urban ^a	Alaska Rural 1	Alaska Rural 2	Hawaii
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: [9].

^a See [13] for details regarding Alaska city and village classifications.

Family Subsistence Supplemental Allowance

FSSA was established in 2001 to eliminate servicemembers' needs for SNAP benefits. Originally, the incentive was available to all qualified servicemembers, regardless of where they were stationed. The incentive was terminated in 2016 for servicemembers serving in the United States, including the territories of Puerto Rico, Guam, and the Virgin Islands [2-3].

To qualify for FSSA, servicemembers must be serving outside the United States, Puerto Rico, Guam, and the Virgin Islands; must be receiving BAS; must have at least one military dependent; and must have household income, including military income of the member and any other household income, less than 130 percent of USDA federal poverty level. The entitlement is calculated as the amount that would make the household gross income equal to 130 percent of the federal poverty line, but no more than \$1,100 per month [14]. Note that, in contrast to SNAP, FSSA eligibility considers gross income only, without any deductions, and without consideration of assets.

How Military Pays Are Treated

With only a few exceptions, all military compensation is considered as income for SNAP and FSSA purposes. The only exceptions are additional payments received by a member while deployed to a combat zone that was not received by the servicemember before his or her deployment or service in a federally designated combat zone [15]. The regulations that specify these exceptions follow:

- Chapter 5 of Title 37, United States Code
- Consolidated Appropriations Act of 2005, Public Law 108-447 (December 8, 2004)
- Title 7 of the Code of Federal Regulations (CFR) 273.9 (c)(20)

Our estimates of how many servicemembers would be eligible for SNAP and FSSA are based in part on data provided by the QRMC, including basic pay,³ Basic Allowance for Housing (BAH), Basic Allowance for Subsistence (BAS), and the Cost-of-Living Allowance (COLA). In this section, we briefly describe BAH, BAS, and COLA.

Basic Allowance for Housing

BAH compensates uniformed military servicemembers for housing costs comparable to local civilian housing markets. The nontaxable allowance varies by duty station location, paygrade, and dependency status [16]. 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; the number of dependents is not a consideration. As long as a member's location, rank, and dependency status remain the same, his or her allowance can only be increased [17].

Members who live in government-owned military installation housing—either single or family housing—do not pay rent or utilities and therefore do not receive BAH. Members who live in military installation housing maintained by a private-sector company or in offbase civilian housing receive the BAH allowance dictated by their location, rank, and dependency status in addition to basic pay [18].

³ For each paygrade, we use FY 2018 basic pay for the years of service with the greatest number of servicemembers in that paygrade, according to data provided by the QRMC.

Members who do not receive BAH because they live in government-owned housing receive “in-kind” benefits, defined as benefits for which no monetary payment is made on behalf of the household. According to the CFR,⁴ any gain or benefit (including in-kind benefits) that is not in the form of money payable directly to the household is exempt from income for SNAP eligibility purposes.

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 or other household members. The 2018 rates for BAS are \$254.39 per pay period for officers and \$369.39 for enlisted members [19]. If a member is receiving BAS, the member must pay for meals even when the meals are provided by the U.S. 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, referred to as subsisted-in-kind [3]. Typically, individuals are not eligible for SNAP if an institution provides most of their meals.

Cost-of-Living Allowance

COLA helps to offset high costs of living in locations within the continental United States that exceed average costs by 8 percent or more [20]. 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 [21].

⁴ Specifically, this refers to Code of Federal Regulations, Title 7, Subtitle B, Chapter 11, Subchapter C, Part 273, Subpart D, Section 273.9.

Estimated Number of Members Eligible for SNAP

The Defense Manpower Data Center (DMDC) provided the QRMC with summary statistics regarding the number of members in each service, paygrade, and MHA in FY 2018 and, for each of these categories, the number of servicemembers with dependents—ranging from zero to six or more dependents—and whether they receive BAH.⁵ We combined these data with the compensation data described earlier to derive our calculations of the number of members who satisfy SNAP requirements in a given MHA and paygrade. A large number of MHAs are not associated with a specific location, primarily because they pertain to Puerto Rico and other territories. Because we could not match those MHAs to specific locations, we exclude all MHAs that are not in DC or the 50 states.⁶

Simplifying assumptions

The lack of more detailed income and household information required us to make a number of simplifying assumptions. First, we assumed that a household has no other income sources, including no special pays, bonuses, or spousal income. This means that we calculate members' gross income as the total of basic pay, BAH, BAS, and COLA. Second, we assumed that a household has no child care or child support payments and that no elderly or disabled people are part of the household. Third, because most states permit the exclusion of at least one vehicle, and lacking information regarding assets, we assumed that all households meet the asset eligibility requirements. Many members receive special pays or bonuses, or have spouses who earn income. Therefore, our estimates could be higher than the numbers who actually qualify for SNAP.

Our fourth assumption was that the number of household members equals the number of dependents plus the servicemember. This is an especially important assumption regarding our

⁵ For example, DMDC provided us with the number of E-4s in each MHA who have one dependent and receive BAH, who have one dependent and do not receive BAH, who have two dependents and receive BAH, and so on. We use the calculations for a household with seven members to estimate SNAP eligibility for all servicemembers with six or more dependents.

⁶ Some MHAs, notably DC, cover more than one state. We base our calculations on the state in which the MHA indicates it is associated.

estimates, as we describe later. Note, however, that this is likely not the case in a sizable number of households. For instance, members who are living with, but not married to, significant others (and the significant other's children from a previous relationship) are not able to claim those persons as military dependents, but they would count as household members. The number of dependents for each member in a dual-military couple also is not accurate because of rules regarding which member claims the dependents.⁷ Since some members have more household members than qualifying military dependents, our estimates could be lower than the number who actually qualify for SNAP.

Finally, recall that rent or mortgage payments are deductions from gross income. However, we do not know the amount of rent or mortgage payments for members who receive BAH, so we use the amount of BAH a member receives in that MHA and paygrade as a measure of their rent or mortgage payments. We also use the SUA to calculate net income for members who receive BAH, but we assume that members who do not receive BAH do not have utility expenses. Hence, the only deduction from gross income for members who do not receive BAH is 20 percent of their income and the standard deduction based on household members.⁸

The accuracy of our estimates of eligibility depends on the extent to which servicemembers do not violate our assumptions regarding the number of household members, household income, mortgage or rent payments, assets, and childcare or child support payments. We are not able to estimate the magnitude of these potential errors in estimates, however.

Methodology

For each MHA and paygrade, we calculated the minimum number of household members (including the servicemember) that would be necessary to make that household eligible for SNAP based on gross and net income for each of the compensation categories: (1) those with no BAH, (2) those with BAH without dependents, and (3) those with BAH with dependents.

Since households must satisfy both gross and net income limits, we then indicated which of these was the largest for each of these three compensation categories; this was the minimum number of household members necessary to qualify for SNAP. For instance, if an E-4 who

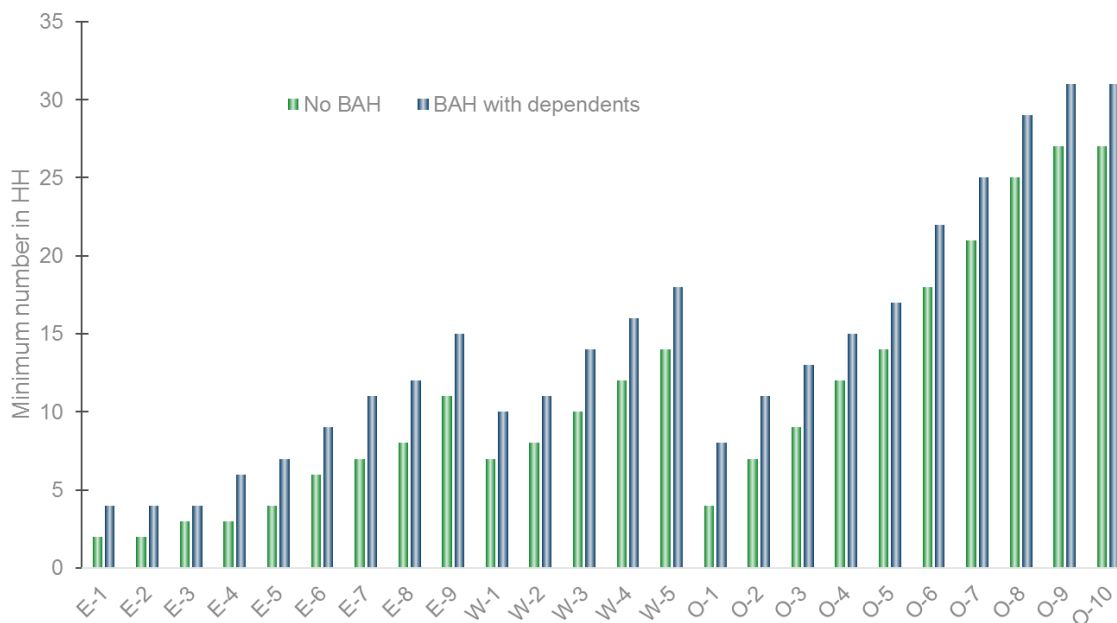
⁷ According to [22], as of 2015, 3 percent of all active component servicemembers were in dual-military marriages and had children.

⁸ As an example, the monthly compensation for an E-4 with two dependents in a particular MHA in Florida who receives BAH with dependents is \$4,095. We first deduct from this amount 20 percent (\$819) and \$160 standard deduction for a household with three members, leaving \$3,116. We then calculate whether the member has excess shelter costs, calculated as BAH (\$1,356) plus SUA for Florida (\$347), for a total of \$1,703. We deduct the amount of these shelter costs that exceed half of \$3,116 (which is \$1,558). Hence, we deduct \$145 in excess shelter costs from \$3,116 to derive net income of \$2,971.

receives BAH with dependents in an MHA would qualify with four household members based on gross income, but would require five household members based on net income, we indicated that E-4s in that MHA who receive BAH would require at least five household members to qualify for SNAP. In about one-quarter of the observations (equal to a paygrade and MHA combination), both the gross and net income constraints result in the same number of minimum household members required. In about 70 percent of the observations, however, the net income requirement, which is 100 percent of the federal poverty line, is the binding constraint.

Figure 2 displays the minimum number of household members a servicemember would need to be eligible for SNAP in each paygrade, across all MHAs, and for each compensation category. Since the minimum number of household members required for SNAP eligibility is very similar for members who receive BAH with dependents and those who receive BAH without dependents, we include the values for those who do not receive BAH and those who receive BAH with dependents only.

Figure 2. Minimum number of household (HH) members necessary to be eligible for SNAP, by paygrade



Sources: CNA analysis of QRMC and DMDC data and publicly available SNAP policy information.

A servicemember without dependents would not qualify for SNAP in any MHA, in any compensation category. This means that it is not possible for any servicemember who receives BAH without dependents to qualify for SNAP, so we drop this compensation category from our analysis.

E-1 and E-2 servicemembers would qualify in some locations⁹ if they did not receive BAH and lived in a household with two or more members; if they received BAH with dependents, they would require at least four household members. Note that, while there are policies regarding the maximum number of dependents that new recruits may have at accession, there are no policies regarding the maximum number of dependents that members may have and remain in the active component.

Results

We combined our estimates of the number of household members necessary to qualify for SNAP with the data from DMDC to calculate the number of servicemembers in each MHA and paygrade that have the minimum number of household members to qualify, given our assumptions as described previously.¹⁰

Table 4 displays our results for each compensation category and overall. The first three columns of results refer to the number of servicemembers that we estimate are eligible for SNAP each month; results in the second set are our estimates of the total monthly amount of SNAP that these servicemembers would receive; and results in the last three columns are the total monthly amount of compensation that would be necessary to make these members ineligible for SNAP. Since we estimate that no officer or any enlisted servicemember above the paygrade of E-7 is eligible for SNAP, we include only paygrades E-1 to E-7. Recall that all eligible servicemembers must have at least one military dependent.

We estimate that 1,929 servicemembers would be eligible for SNAP each month. On an annualized basis, the total cost of SNAP benefits they would receive is \$3.1 million, and the annual amount of additional compensation these servicemembers would require in order to no longer be eligible for SNAP is \$5.6 million, roughly 1.8 times the amount of their SNAP benefits. Recall that SNAP guidelines indicate that recipients should spend 30 percent of their

⁹ This includes E-1s with one dependent living in some MHAs in Alaska, Hawaii, and Vermont; E-2s with one dependent living in some MHAs in Alaska and Hawaii; and E-1s and E-2s with two dependents living in MHAs in several states.

¹⁰ We found that, while the compensation of some servicemembers is slightly below both the net and gross income limits for SNAP eligibility (typically no more than \$100 per month), their net income is too high for them to qualify for any SNAP benefit. Our reported total number of servicemembers eligible for SNAP excludes these servicemembers.

net income on food, and that several deductions are made to gross income to derive net income. As a consequence, the amount of SNAP benefits is far less than the additional gross income they would require because each additional dollar recipients earn in income reduces their SNAP benefit by less than 30 cents.

About half of these servicemembers (903) are E-1 through E-3. Members in all services advance fairly quickly to E-4 (just 8 percent of all E-3 servicemembers have three or more years of service, according to our data), so junior members who qualify for SNAP would be eligible for a period of a few months to perhaps one or two years due to promotions.

Table 4. Estimated SNAP results by paygrade and compensation category

Pay-grade	Number eligible			Monthly SNAP benefits (\$)			Total additional monthly compensation required (\$)		
	No BAH	BAH w/ dependents	Total	No BAH	BAH w/ dependents	Total	No BAH	BAH w/ dependents	Total
E-1	9	180	189	1,815	20,048	21,863	7,157	42,107	49,264
E-2	18	222	240	2,005	21,220	23,225	6,469	38,276	44,745
E-3	32	442	474	5,956	61,327	67,283	19,433	108,162	127,595
E-4	96	450	546	9,510	81,295	90,806	29,746	113,870	143,616
E-5	135	329	464	19,515	33,408	52,923	57,284	32,410	89,694
E-6	13	0	13	2,531	0	2,531	6,590	0	6,590
E-7	3	0	3	382	0	382	876	0	876
E-8	0	0	0	0	0	0	0	0	0
E-9	0	0	0	0	0	0	0	0	0
Total	306	1,623	1,929	41,716	217,300	259,016	127,555	334,825	462,380

Source: CNA analysis of QRMC and DMDC data and publicly available SNAP policy information.

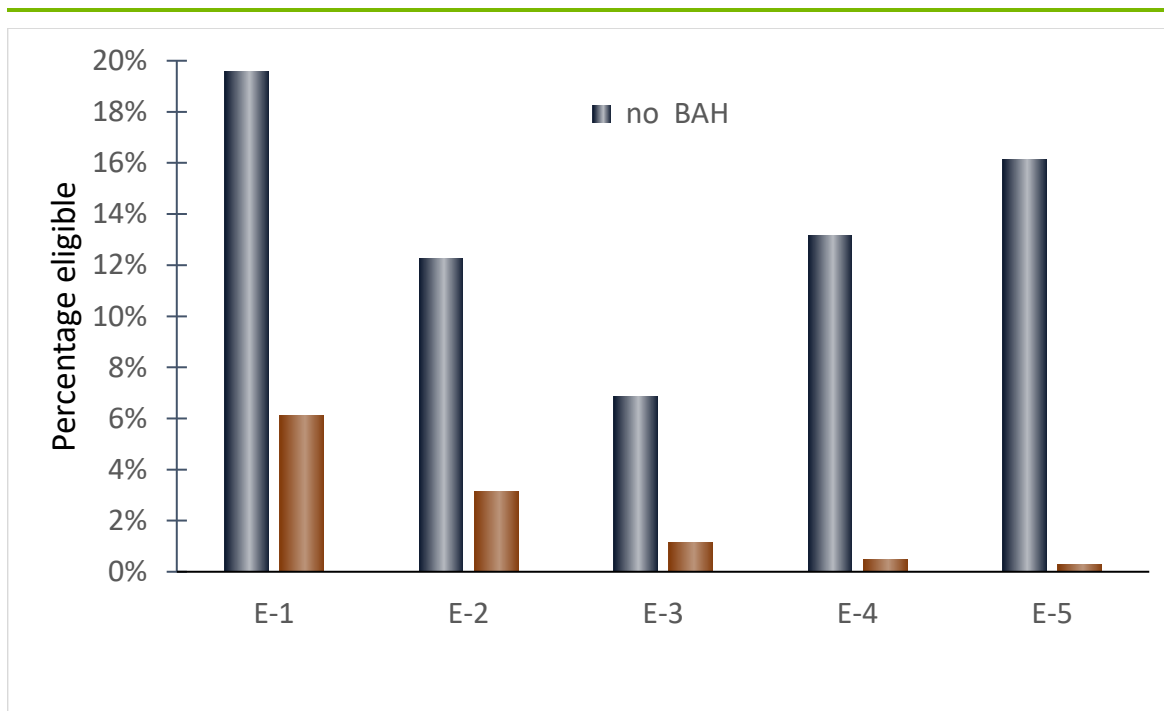
Far fewer servicemembers who do not receive BAH are eligible for SNAP than those who receive BAH with dependents because there are so few of them; at least 98 percent of servicemembers with dependents in each paygrade receive BAH with dependents. As a percentage of members in that paygrade and compensation category with dependents, however, servicemembers who do not receive BAH are far more likely to be eligible for SNAP. Specifically, 0.4 percent of all servicemembers who receive BAH with dependents would be eligible for SNAP according to our assumptions, while 10.0 percent of those with dependents who do not receive BAH would qualify.

The reason for this differential is that the amount of excess shelter costs that can be deducted from gross income is always less, and often far less, than the difference in compensation between those who receive BAH and those who do not. For example, E-5s in Anchorage, Alaska, who receive BAH and have two dependents receive \$2,133 more in compensation than E-5s

with two dependents who do not receive BAH, but those receiving BAH can deduct only \$1,036 more from their gross income than those who do not receive BAH. The net income for the latter is \$1,097 lower than the net income for the former even though both are in the same paygrade, living in the same MHA, with the same number of military dependents. Because the in-kind benefit is not included in SNAP eligibility, those who do not receive BAH will always be more likely to qualify for SNAP benefits.

We illustrate this finding in Figure 3, in which we display the percentage of E-1–E-5 servicemembers with at least one dependent who are eligible for SNAP according to our calculations, by whether they receive BAH with dependents or do not receive BAH. E-1 members with dependents who do not receive BAH are more than 3 times more likely to qualify for SNAP than their peers with dependents who receive BAH. The differential is greatest for E-5s; those who do not receive BAH are over 60 times more likely to qualify for SNAP than their peers with dependents who receive BAH. For all E-1–E-7 servicemembers with dependents, 0.4 percent and 10 percent of those who receive BAH and who do not receive BAH, respectively, qualify for SNAP, according to our estimates.

Figure 3. Percentage of E-1–E-7 servicemembers with dependents who are eligible for SNAP by paygrade and compensation



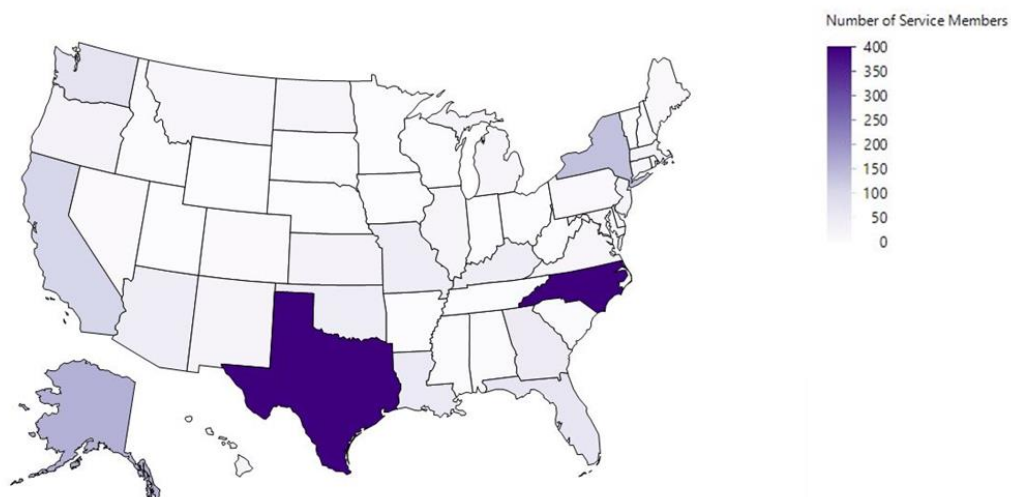
Source: CNA analysis of QRMC and DMDC data and publicly available SNAP policy information.

Next, we examine the geographic distribution of enlisted members estimated to be eligible for SNAP. The results are in Appendix B, differentiated by compensation category. We display the total number of eligible servicemembers, regardless of compensation category, in Figure 4.

We estimate that the most enlisted members who would qualify are stationed in North Carolina and Texas (411 and 410 qualify, respectively). Alaska and New York, the states with the third and fourth most qualifying servicemembers (160 and 137, respectively), have fewer than half of those eligible in North Carolina and Texas.

Geographic differences in the number of eligible members could be due to (1) differences in eligibility criteria or compensation (because of COLA and/or BAH differences) for members in the same paygrade across states/MHAs, (2) the geographic distribution of servicemembers by paygrade, or (3) some combination of these factors. One way to examine the source of the geographic differences is to compare the percentage of servicemembers eligible in each state for each paygrade. This controls for the differences in the geographic distribution of servicemembers; state differences in the percentage eligible are due to differences in state criteria and/or relative compensation.

Figure 4. Geographic distribution of estimated eligible enlisted members



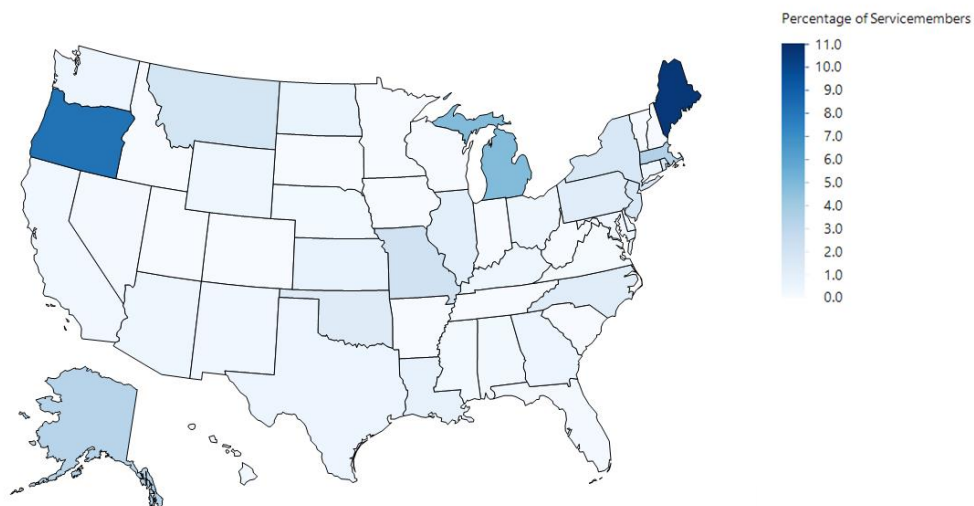
Source: CNA analysis of QRMC and DMDC data and publicly available SNAP policy information.

In Figure 5, we display the percentages of all E-4 servicemembers with at least one dependent in each state that are eligible for SNAP. We chose E-4 because that is the paygrade with the greatest number of eligible servicemembers.

The states with the greatest percentages of E-4 servicemembers with dependents that we estimate would qualify for SNAP are Maine (11 percent), Oregon (8 percent), and Michigan (5 percent). There are 14 states in which no eligible E-4 servicemembers are stationed.

On further inspection, we find that Maine, Oregon, and Michigan are three of the four states with the highest percentages of E-4 servicemembers who do not receive BAH (17, 38, and 17 percent, respectively),¹¹ and, as noted earlier, servicemembers who do not receive BAH are more likely to be eligible for SNAP. In addition, these states have a higher gross income threshold than the federal limit of 130 percent (the gross income limit for Maine and Oregon is 185 percent of the federal poverty line; for Michigan, it is 200 percent of federal poverty).

Figure 5. Percentages of E-4s with at least one dependent that are eligible for SNAP



Sources: CNA analysis of QRMC and DMDC data and publicly available SNAP policy information.

¹¹ The fourth state is Massachusetts, where 24 percent of E-4 servicemembers with dependents do not receive BAH. Across all states and DC, just 1 percent of E-4s with at least one military dependent do not receive BAH.

Estimated Number of Members Eligible for FSSA

We used the same data provided to us by the QRMC and DMDC to derive our estimates of the number of servicemembers who would be eligible for FSSA if the incentive were once again applied to members stationed in the United States. As before, because of the issues with how MHAs are defined, our estimates include only the 50 states and DC.

Simplifying assumptions

The calculations for FSSA eligibility do not include estimates of costs or the valuation of assets; they depend only on household income, based on household size. As a consequence, we must assume that the household has no income sources other than basic pay, BAH, BAS, and COLA. Further, we assume that the household has no members other than the servicemember and his or her military dependents.

Recall that FSSA puts a monetary value on the in-kind benefit that members receive who do not receive BAH. We value the benefit as the amount of BAH with dependents the servicemember would receive in that MHA and paygrade. As we noted earlier, less than 1 percent of all servicemembers with at least one dependent in the 50 states and DC do not receive BAH.

Methodology

To determine which servicemembers would be eligible for FSSA, we estimated how much additional compensation servicemembers would require to equate their compensation to 130 percent of the federal poverty line for a household of their size, but no more than \$1,100, which is the cap on FSSA.

Results

Table 5 displays our results. We estimate that 578 servicemembers would be eligible for FSSA in the 50 states plus DC. This is less than one-third of the number eligible for SNAP. None of these servicemembers are above the paygrade of E-5, and their minimum number of household members is five. The annual cost of the incentive would be \$1.5 million.

Table 5. Estimated FSSA results by paygrade and compensation category

Paygrade	Number eligible			Monthly FSSA benefits (\$)		
	No BAH	BAH with dependents	Total	No BAH	BAH with dependents	Total
E-1	1	36	37	951	10,903	11,854
E-2	1	48	49	133	10,953	11,086
E-3	1	125	126	266	37,703	37,969
E-4	1	269	270	208	57,091	57,299
E-5	0	96	96	0	9,023	9,023
Total	4	574	578	1,558	125,672	127,231

Source: CNA analysis of QRMC and DMDC data and publicly available SNAP policy information.

Note that, since there is no difference in the calculation for eligibility between servicemembers who do and do not receive BAH, far fewer members who do not receive BAH would qualify for FSSA. Each qualifying E-1 and E-2 servicemember who does not receive BAH has five military dependents, while the E-4 and E-5 servicemembers have six military dependents.

Our complete results by state and compensation category are in Appendix C. The three states with the most eligible servicemembers are the same as the top three for SNAP (though in different order). They are Texas (85), North Carolina (68), and Alaska (65). Together, these three states include 38 percent of all of the members we identify who would be eligible for FSSA.

Summary

Based on our assumptions, we estimate that 1,929 servicemembers would qualify for SNAP, all of whom are in paygrades E-1 to E-7 and have at least one military dependent. The total amount of SNAP benefits that these eligible servicemembers would receive each year is \$3.1 million, and the annual amount of additional compensation these servicemembers would require to no longer be eligible for SNAP is \$5.6 million.

Our analysis has also shown that servicemembers with dependents who do not receive BAH because they live in government-provided quarters are far more likely to qualify for SNAP than their peers in the same MHA who do receive BAH. The reason is that their quarters are considered in-kind compensation and, as such, do not count toward SNAP income limits. Even so, fewer than 1 percent of E-1–E-7 servicemembers with at least one dependent do not receive BAH.

If servicemembers stationed in the United States became eligible to receive FSSA, we estimate that 578 would be eligible, fewer than one-third of those eligible for SNAP. All of those whom we identify as eligible are in paygrades E-1 to E-5, and all have at least four dependents. The annual cost of FSSA for these members would be \$1.5 million.

If all eligible servicemembers serving in the United States received FSSA, there would still be additional servicemembers who would be eligible to receive SNAP, and some of those receiving FSSA would still be eligible for some SNAP benefits. This could happen for three reasons. First, FSSA is capped at \$1,100, and that amount would not be sufficient to make some members no longer eligible for SNAP. Second, many states have a gross income threshold that is higher than 130 percent of the federal poverty line. And, third, while FSSA guidelines monetize BAH for those who do not receive BAH, SNAP eligibility requirements do not, so calculated household income is far less for servicemembers who do not receive BAH under SNAP guidelines relative to FSSA rules.

Appendix A: State SNAP Eligibility Criteria

Table 6 contains information on state-specific eligibility criteria, including whether a state uses a BBCE criterion, gross income limits, SUA rules, and asset limits. Every state counts BAH as income for SNAP eligibility purposes.

Table 6. State SNAP criteria

State	BBCE	SUA ^a	Gross income limit (% of federal poverty line)	Asset limit	Vehicles included
AL	Yes	Mandatory: \$352	130	(b)	No
AK	No	Mandatory: Central-\$371, North - \$564, NW - \$848, South Central - \$434, SE - \$355, SW - \$767	130	Federal standard	At least one exempt
AZ	Yes	Mandatory: 1-3 HH \$274, 4+ HH \$370	185	No limit	No
AR	No	Not mandatory: \$278	130	Federal standard	At least one exempt
CA	Yes	Mandatory: \$397	200	No limit	No
CO	Yes	Mandatory: \$469	130	(b)	No
CT	Yes	Mandatory: \$728	185	No limit	No
DE	Yes	Mandatory: \$406	200	No limit	At least one exempt
FL	Yes	Mandatory: \$347	200	No limit	No
GA	Yes	Mandatory: \$354	130	(b)	No
HI	Yes	Not mandatory: 1 HH - \$174, 2 HH - \$190, 3 HH - \$217, 4/5 HH - \$268, 6 HH - \$315, 7-10 HH - \$357	200	No limit	No
IA	Yes	Mandatory: \$348	160	No limit	At least one exempt
ID	Yes	Mandatory: \$279	130	\$5,000	At least one exempt
IL	Yes	Mandatory: \$394	165	(b)	No
IN	No	Mandatory: \$421	130	Federal standard	No

State	BBCE	SUA ^a	Gross income limit (% of federal poverty line)	Asset limit	Vehicles included
KS	No	Mandatory: \$399	130	Federal standard	At least one exempt; fair market value over \$4,650 included
KY	Yes	Mandatory: \$318	130	(b)	No
LA	No	Mandatory: \$346	130	Federal standard	No
MA	Yes	Mandatory: \$636	200	(b)	No
MD	Yes	Not mandatory: \$420	200	No limit	No
ME	Yes	Mandatory: \$692	185	\$5,000	At least one exempt
MI	Yes	Mandatory: \$537	200	\$5,000	1 st vehicle exempt, others over \$15,000 value counted
MN	Yes	Mandatory: \$556	165	No limit	No
MO	No	Mandatory: \$385	130	Federal standard	No
MS	Yes	Mandatory: \$270	130	No limit	No
MT	Yes	Mandatory: \$534	200	No limit	No
NC	Yes	Mandatory: 1 HH - \$400, 2 HH - \$440 3 HH - \$484, 4 HH - \$528 5+ HH - \$576	200	No limit	No
ND	Yes	Mandatory: \$620	200	No limit	Federal standard
NE	Yes	Mandatory: \$469	130	\$25,000	At least one exempt
NH	(c)	Mandatory: \$689	185	No limit	At least one exempt
NJ	Yes	Mandatory: \$514	185	No limit	No
NM	Yes	Mandatory: \$320	165	No limit	No
NV	Yes	Mandatory: \$266	200	No limit	At least one exempt
NY	(d)	Mandatory: Nassau and Suffolk: \$736, NYC - \$791, all others - \$654	200 with dependent care expenses, otherwise	(b)	No
OH	Yes	Mandatory: \$530	130	(b)	No
OK	Yes	Mandatory: \$330	130	No limit	No
OR	Yes	Mandatory: \$460	185	No limit	At least one exempt
PA	Yes	Mandatory: \$580	160	(b)	At least one exempt
RI	Yes	Mandatory: \$628	185	(b)	At least one exempt

State	BBCE	SUA ^a	Gross income limit (% of federal poverty line)	Asset limit	Vehicles included
SC	Yes	Mandatory: \$302	130	(b)	At least one exempt
SD	No	Mandatory: \$721	130	Federal standard	At least one exempt
TN	No	Not mandatory: 1 HH- \$311, 2 HH- \$322, 3 HH- \$334, 4 HH- \$346, 5 HH - \$357, 6 HH- \$369, 7 HH- \$379, 8 HH- \$391, 9 HH- \$405, 10+ HH - \$415	130	Federal standard	No
TX	Yes	Mandatory: \$342	165	\$5,000	Excludes one vehicle up to \$15,000, includes excess vehicle value
UT	No	Mandatory: \$365	130	Federal standard	No
VA	No	Not mandatory: 1-3 HH \$306, 4+ HH \$381	130	Federal standard	No
VT	Yes	Mandatory: \$808	185	No limit	At least one exempt
WA	Yes	Mandatory: \$421	200	No limit	At least one exempt
WI	Yes	Mandatory: \$448	200	No limit	No
WV	Yes	Mandatory: \$462	130	No limit	No
WY	No	Mandatory: \$386	130	Federal standard	Federal standard
DC	Yes	Mandatory: \$325	200	No limit	No

Sources: [6, 10, 23-24].

^a HH refers to the number of members of the household.

^b No limit: Households with an elderly/disabled member with income over 200% poverty face \$3,500 limit.

^c HH with at least one dependent child.

^d HH with dependent care expenses or with earned income.

Appendix B: SNAP Estimates by State and Compensation Categories

In Table 7, we show the number and percentage of servicemembers E-1 to E-7 with dependents who we estimate would be eligible for SNAP by compensation category and state. For instance, 95 servicemembers who are stationed in Alaska and who do not receive BAH could be eligible for SNAP. These servicemembers represent 25 percent of all E-1 to E-7 servicemembers stationed in Alaska with dependents who do not receive BAH.

Table 7. Estimates of the number and percentage eligible for SNAP by state and compensation category

State	No BAH		BAH with dependents		Total	
	Number	Percent	Number	Percent	Number	Percent
AK	95	25	65	0.8	160	1.8
AL	0	N/A	2	0.1	2	0.1
AR	0	N/A	1	0.1	1	0.1
AZ	3	6.5	40	0.5	43	0.5
CA	46	5.4	58	0.1	104	0.2
CO	3	16.7	2	0	5	0.0
CT	4	36.4	10	0.4	14	0.5
DC	4	23.5	1	0	5	0.0
DE	0	N/A	8	0	8	0.5
FL	2	3.5	61	0.2	63	0.2
GA	1	3.1	46	0.2	47	0.2
HI	6	9.4	15	0.1	21	0.1
IA	0	N/A	0	N/A	0	N/A
ID	0	N/A	3	0.2	3	0.2
IL	2	13.3	16	0.4	18	0.4
IN	1	14.3	0	N/A	1	0.2
KS	0	N/A	24	0.3	24	0.3
KY	2	9.1	40	0.3	42	0.3
LA	5	17.9	46	0.6	51	0.7
MA	25	14.5	0	N/A	25	1.6
MD	3	7.5	7	0.1	10	0.1
ME	5	14.7	4	1.1	9	2.2
MI	8	12.9	9	1	17	1.7
MN	0	N/A	0	N/A	0	N/A

State	No BAH		BAH with dependents		Total	
MO	0	N/A	43	0.9	43	0.9
MS	0	N/A	2	0.1	2	0.1
MT	0	N/A	14	1	14	1.0
NC	14	4.2	397	0.9	411	1.0
ND	0	N/A	19	0.6	19	0.6
NE	0	N/A	1	N/A	1	0.0
NH	1	50	0	N/A	1	0.1
NJ	19	12.7	3	0.1	22	0.6
NM	1	9.1	20	0.4	21	0.4
NV	2	66.7	3	0.1	5	0.1
NY	10	7.2	127	1.3	137	1.4
OH	0	N/A	1	N/A	1	0.0
OK	1	6.7	41	0.6	42	0.6
OR	23	11.2	1	0.1	24	2.7
PA	1	33.3	7	0.6	8	0.7
RI	0	N/A	4	0.7	4	0.7
SC	2	3.4	1	N/A	3	0.0
SD	0	N/A	1	0.1	1	0.1
TN	1	50	0	N/A	1	0.1
TX	7	7.5	403	0.9	410	0.9
UT	0	N/A	1	0	1	0.0
VA	2	2.2	12	0	14	0.0
VT	0	N/A	0	N/A	0	N/A
WA	7	16.7	62	0.2	69	0.3
WI	0	N/A	0	N/A	0	N/A
WV	0	N/A	1	0.9	1	0.9
WY	0	N/A	1	0.1	1	0.1
Total	306	10.0	1,623	0.4	1,929	0.4

Sources: CNA analysis of QRMC and DMDC data and publicly available SNAP policy information.

Appendix C: FSSA Estimates by State and Compensation Categories

In Table 8, we show the number and percentage of servicemembers E-1 to E-7 with dependents who we estimate would be eligible for FSSA by compensation category and state. For instance, 65 servicemembers who are stationed in Alaska and who receive BAH could be eligible for FSSA. These servicemembers represent 0.8 percent of all E-1–E-7 servicemembers stationed in Alaska who receive BAH.

Table 8. Estimates of the number and percentage eligible for FSSA by state and compensation category

State	No BAH		BAH		Total	
	Number	Percent	Number	Percent	Number	Percent
AK	1	0.3	65	0.8	66	0.8
AL	0	N/A	2	0.1	2	0.1
AR	0	N/A	1	0.1	1	0.1
AZ	0	N/A	16	0.2	16	0.2
CA	0	N/A	20	0.0	20	0.0
CO	1	5.6	2	0.0	3	0.0
CT	0	N/A	1	0.0	1	0.0
DC	0	N/A	0	N/A	0	N/A
DE	0	N/A	0	N/A	0	N/A
FL	0	N/A	4	0.0	4	0.0
GA	0	N/A	46	0.2	46	0.2
HI	0	N/A	0	N/A	0	N/A
IA	0	N/A	0	N/A	0	N/A
ID	0	N/A	3	0.2	3	0.2
IL	0	N/A	2	0.0	2	0.0
IN	0	N/A	0	N/A	0	N/A
KS	0	N/A	24	0.3	24	0.3
KY	0	N/A	40	0.3	40	0.3
LA	0	N/A	46	0.6	46	0.6
MA	0	N/A	0	N/A	0	N/A
MD	0	N/A	0	N/A	0	N/A
ME	0	N/A	0	N/A	0	N/A
MI	0	N/A	2	0.2	2	0.2
MN	0	N/A	0	N/A	0	N/A

State	No BAH		BAH		Total	
MO	0	N/A	43	0.9	43	0.9
MS	0	N/A	2	0.1	2	0.1
MT	0	N/A	13	0.9	13	0.9
NC	0	N/A	68	0.2	68	0.2
ND	0	N/A	3	0.1	3	0.1
NE	0	N/A	1	0.0	1	0.0
NH	0	N/A	0	N/A	0	N/A
NJ	0	N/A	0	N/A	0	N/A
NM	0	N/A	6	0.1	6	0.1
NV	0	N/A	1	0.0	1	0.0
NY	0	N/A	15	0.2	15	0.2
OH	0	N/A	1	0.0	1	0.0
OK	0	N/A	41	0.6	41	0.6
OR	1	0.5	0	N/A	1	0.1
PA	1	33.3	2	0.2	3	0.3
RI	0	N/A	0	N/A	0	N/A
SC	0	N/A	1	0.0	1	0.0
SD	0	N/A	1	0.1	1	0.1
TN	0	N/A	0	N/A	0	N/A
TX	0	N/A	85	0.2	85	0.2
UT	0	N/A	1	0.0	1	0.0
VA	0	N/A	12	0.0	12	0.0
VT	0	N/A	0	N/A	0	N/A
WA	0	N/A	2	0.0	2	0.0
WI	0	N/A	0	N/A	0	N/A
WV	0	N/A	1	0.9	1	0.9
WY	0	N/A	1	0.1	1	0.1
Total	4	0.0	574	0.1	578	0.1

Source: CNA analysis of QRMC and DMDC data and publicly available FSSA policy information.

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Abbreviations

ABAWD	able-bodied adult without dependents
BBCE	Broad-Based Categorical Eligibility
BAH	Basic Allowance for Housing
BAS	Basic Allowance for Subsistence
CFR	Code of Federal Regulations
COLA	Cost-of-Living Allowance
DC	District of Columbia
DEERS	Defense Enrollment Eligibility Reporting System
DMDC	Defense Manpower Data Center
FY	fiscal year
FSSA	Family Subsistence Supplemental Allowance
HH	household
MHA	Military Housing Area
NAP	Nutrition Assistance Program
QRMC	Quadrennial Review of Military Compensation
SNAP	Supplemental Nutrition Assistance Program
SSI	Supplemental Security Income
SUA	Standard Utility Allowance
TANF	Temporary Assistance for Needy Families

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