### USDA and the White House Proposals to Cut 3SquaresVT (SNAP): Overview and Harm in Vermont

Produced by Hunger Free Vermont, February 2020 (adapted from MLRI)

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| **Able Bodied Adults without Dependents (ABAWDs) – Three month time limit** | Limit of 3 months of 3SVT in 3 years for 18-49 year old ‘ABAWDs’ not otherwise exempt (e.g. disabled, living with a child, pregnant, experiencing significant barriers to employment) or must meet rigid work rules. But states can exempt ABAWDs from time limit in a) areas of the state with elevated unemployment and b) grant certain individual exemptions. | • USDA rule drastically restricts criteria states use to exempt ABAWDs living in areas with higher unemployment  
• Reduces ability of states to grant individual exemptions to ABAWDs in special circumstances. | Public comment period ended April 10, 2019. **Final rule issued Dec. 5, 2019.**  
**Delayed by court action,** Lawsuit filed by 15 states (Including VT) and New York City on 1/16/20.  
If implemented, changes will begin taking effect on 4/1/20. | • States lose most unused individual exemptions on 10/1/20.  
• States lose all geographic waivers.  
• Would hinder residents from accessing 3SVT during economic downturns.  
• 3SVT would be less responsive during economic downturns. |
| **Broad Based Categorical Eligibility (BBCE) – Higher 3SVT/SNAP gross income limit, no asset test** | States have the option to:  
• Use higher gross income limit for determining 3SVT eligibility for households (federal limit is 130% of the Federal Poverty Level – FPL)  
• Waive an asset test for 3SVT. 42 states use this option. VT uses 185% FPL gross income test and waives asset test. | • Would reduce eligibility by restricting state option to allow low-wage worker households with gross income above 130% FPL to qualify, even if household has very low net income.  
• Would restrict state option to waive asset test. | Public comment period ended Nov. 1, 2019. **Final rule NOT yet issued.** | • Approx. 13,000 VTers would lose all 3SVT benefits.  
• Approx. $7.5M/year loss of 3SquaresVT in VT.  
• Loss of automatic free school meals for approx. 4,600 VT children. |
| **Standard Utility Allowance (SUA) – Shelter costs & 3SVT benefit calculation** | Utility costs are part of shelter deduction which determines 3SVT benefit level for households. The “SUA” standardizes utility costs so households don’t have to verify actual costs – saving energy/time for states & households, and reducing errors. | • Would require USDA to set SUA based on federal methodology. States would not be allowed to use state data to inform federal calculation.  
• NE states & other high energy cost states would have to use a lower SUA value that does not fully capture utility expenses, triggering loss of benefits. | Public comment period ended Dec. 2, 2019. **Final rule NOT yet issued.** | • Approx. 26K VT households (68%) would lose an average of $82/month in 3SVT. VT harmed more than any other state.  
• Approx. $26M/year loss of 3SquaresVT in VT.  
• Disproportionately harms low income older adults and people with disabilities. |

In State Fiscal Year 2019, an average of over 70,000 VTers participated in 3SVT, bringing over $101M into VT’s economy.