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Identifying Opportunities for State Sovereignty Over Self-Reliance Programs

DHW's self-reliance programs represent a complex partnership between the state and federal government. Because of the overlapping jurisdictions, it is often difficult to ascertain which discretionary variables are under the purview of the state versus which are mandated by the federal government.

To better disentangle the role of the state in setting eligibility and benefits for various welfare programs, the Division of Self-Reliance shall commission a report covering the following elements. The primary purpose of the report shall be to identify in which area the state can modify requirements.

Over time, it may be difficult for program staff to identify what are actual federal requirements versus perceived federal requirements. Thus, actual federal laws should be consulted and cited as justification for the range of allowable state choices. State choices should be portrayed on a continuum from most restrictive to least restrictive, and other state comparisons should be drawn from the most recent publicly available resources and cited.

- The report shall cover the following programs:
    - Supplemental Nutrition Assistance Program (SNAP)
    - Idaho Child Care Program (ICCP)
    - Temporary Assistance for Needy Families (TANF)
    - Aid to the Aged, Blind, and Disabled (AABD)
    - Low-Income Home Energy Assistance Program (LIHEAP)
    - Weatherization Assistance Program (WAP)

- Eligibility Variables:
    - What are the minimum and maximum allowable income thresholds?
    - How does Idaho's current income threshold compare nationally (reporting minimum, maximum, average, and median levels).

- o What discretion does the state have to define countable income? How does Idaho's countable income compare nationally?
- o Are there any allowable asset limits? How does Idaho's asset limit compare nationally?
- o Is categorical eligibility allowable? If so, describe. How does Idaho's use of categorical eligibility compare to other states?
- o What documentation is required for eligibility? Does Idaho accept self-attestation? How does Idaho's documentation requirements compare nationally?
- o Are there any requirements related to resident or immigration status?
- o Are any limits allowed for limiting eligibility duration? If so, how does Idaho's duration compare nationally?
- o How often can eligibility be redetermined? How does Idaho's redetermination timeframe compare nationally?
- o Are there are penalties or incentives for marriage that can be addressed by states?
- o Are there allowable options to reduce benefit cliffs? How does Idaho's cutoff points compare nationally?

- **Benefit Variables:**
  - o What are the discretionary benefits a state may set?
  - o How does Idaho's benefit levels compare nationally?
  - o Can a state declare any benefits or services non-allowable? If so, how do Idaho's non-allowable benefits compare nationally?
  - o Can a state limit vendors who may receive benefit payments from eligible beneficiaries? If so, how do Idaho's current limits compare nationally?

- **Work Requirements:**
  - o Can states set a work requirement for the program?
  - o Does Idaho have a work requirement? If so, what are the exemptions, and how do these exemptions compare to other states nationally?

- **Miscellaneous:**
  - o What counts as federal match for the program?
  - o Does Idaho draw down its maximum federal match?
  - o Can other existing state funds be counted toward the federal match?

- **Waiver Authority:**
  - o Does federal law allow any waivers for the program? If so, what are the allowable parameters? What recent waivers have other states received approval for that Idaho has not yet sought?

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Due Date: March 31, 2025 for initial public report.

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