



DC | DEPARTMENT of HUMAN SERVICES

Policy Quick-Reference Guide

SNAP: What Counts and What Doesn't? Assessing the Impact of Additional Cash Assistance or In-Kind Benefits on SNAP

This policy quick-reference guide will help you understand the potential impact of a new cash or in-kind benefit on a household's SNAP benefits.

When SNAP households in the District receive new types of income, including income in the form of benefits from other assistance programs, it can affect the amount of SNAP benefits the household receives and the household's eligibility for SNAP.

This policy document includes a series of questions to consider when assessing whether SNAP households will be affected by receiving other benefits. For each question, the document provides a "What to know" summary, along with policy details, examples, and a "What to take away" statement of how specific government assistance or contributions from third parties would be treated under SNAP rules. The document includes a table of contents that helps you navigate directly to any specific questions. For each question, you can click the question number to minimize or expand the question content. You can also navigate back to the table of contents using the "Table of Contents" hyperlink in each section.

If you have questions, please contact Economic Security Administration (ESA) Policy at esapolicy@dc.gov. The contents of this guidance document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

The District of Columbia (District) Supplemental Nutrition Assistance Program (SNAP) is a food assistance program for individuals and families with low incomes. SNAP is designed to supplement a household's available food budget. To determine eligibility and monthly benefit amounts in SNAP, the District must count a household's income, minus certain deductions. As income rises, SNAP is structured to phase out benefits gradually.

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1. Does SNAP have a specific policy to include or exclude the benefit?

Policy

First, consider if the benefit is specifically included or excluded from consideration during SNAP eligibility and benefit determinations.

According to SNAP rules, all payments to a household are considered income for SNAP unless they fit within a specific exclusion explicitly listed in Federal laws or regulations. SNAP rules also explicitly list some items considered “unearned” or “earned” income. The list of what counts as unearned and earned income is also helpful to understand the limits of the SNAP income exclusions.

What to know

- SNAP rules explicitly exclude certain types of payments from being considered as income when determining SNAP eligibility and benefit levels.
- SNAP rules also explicitly include a number of items that are to be counted as “unearned” or “earned” income.

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Explicitly Excluded Benefits

Key exclusions from income for SNAP follow:

- [Types of income the District excludes for Temporary Assistance for Needy Families \(TANF\) cash assistance or Medicaid](#) (State option)
- [In-kind benefits](#)
- [One-time gift cards to a specific establishment](#)
- [Vendor payments paid directly to a third party on behalf of the household](#), including public assistance (PA), general assistance (GA), and U.S. Department of Housing and Urban Development (HUD) vendor payments
- [One-time payments](#) (nonrecurring lump-sum payments)
- [Income received too infrequently or irregularly to be reasonably anticipated, if it is \\$30 or less per quarter](#)
- [Cash donations from a private nonprofit of \\$300 or less per quarter](#)
- [Certain types of educational assistance](#)
- [Certain types of employment and training assistance](#)
- [Reimbursements that do not represent a gain or benefit to the household](#), such as job training transportation reimbursements to the training site
- Federal [Earned Income Tax Credit](#) (EITC)
- [Payments to volunteers under Title II of the Domestic Volunteer Services Act of 1973](#) (DVSA) (e.g., foster grandparents program)

Explicitly Included Benefits

Key items explicitly included in SNAP rules as countable unearned income follow:

- Assistance payments from Federal or federally aided public assistance programs, such as Supplemental Security Income (SSI), TANF, or GA programs, or other assistance programs based on need (unless these payments are vendor payments that are explicitly excluded)
- Annuities; pensions; retirement, veteran's, or disability benefits; worker's or unemployment compensation; old-age, survivors, or Social Security benefits; strike benefits; foster care payments for household members; certain rental property income
- Support or alimony payments made directly to the household from nonhousehold members
- Scholarships, educational grants, deferred payment loans or education, and veteran's educational benefits in excess of amounts of educational assistance that are excluded
- Educational assistance for room and board
- Payments from government-sponsored programs, dividends, interest, royalties, and all other direct money payments from any source that can be construed to be a gain or benefit
- Monies withdrawn or dividends that are or could be received by a household from trust funds

Key items explicitly included in the SNAP rules as countable earned income follow:

- All wages and salaries of an employee
- Self-employment income
- Training allowances from vocational and rehabilitative programs (not reimbursements)
- Payments under Title I of the DVSA (e.g., VISTA), unless the individual was receiving SNAP at the time they joined the Title I program
- Earnings to individuals participating in on-the-job training programs under Title I of the Workforce Investment Opportunity Act
- Educational assistance that has a work requirement (e.g., work study) and is in excess of amounts of educational assistance that are excluded

Examples

- Payments to volunteers under Title II of the DVSA, such as foster grandparents, are excluded from income in SNAP.
- Payments to volunteers under Title I of the DVSA, such as VISTA volunteers, are considered countable income in SNAP, unless the VISTA volunteer was participating in SNAP when they became a VISTA volunteer.

What to take away

Knowing what is explicitly excluded from income in SNAP and what is explicitly included will help pinpoint what counts and what does not count as income for SNAP purposes.

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2. Does the District exclude the benefit from income in TANF or Medicaid?

Policy

According to SNAP rules, the District has the option to exclude certain types of income from SNAP if it excludes it from income in District Temporary Assistance for Needy Families (TANF) cash assistance or Medicaid. However, the following types of income *cannot* be excluded from SNAP:

- Wages or salaries
- Gross income from a self-employment enterprise
- Regular payments from a government source
- Worker’s compensation
- Child support payments
- Benefits under Titles I, II, IV, X, XIV, or XVI of the Social Security Act, including SSI benefits, TANF benefits, and foster care and adoption payments from a government source
- Support or alimony payments made to the household from a nonhousehold member
- Annuities, pensions, and retirement benefits
- Disability benefits or old age or survivor benefits
- Monies withdrawn or dividends received by a household from trust funds

What to know

- The District has the option to exclude certain types of benefits from income in SNAP if it excludes them from income in TANF or Medicaid.
- Federal SNAP rules place limits on what can be excluded.
- For example, universal basic income payments may be excluded under this provision, but only if they are at least partially privately funded.

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Regarding regular payments from a government source, if the funds are sourced from a mix of private and public sources and are excluded from TANF or Medicaid, they can be excluded from SNAP. In this situation, the SNAP State agency needs to exclude the same amount it excludes for TANF or Medicaid, and it must include in its State Plan of Operations that it has chosen this option. If the funds are from a variety of public sources (e.g., State, local, and Federal), with no private dollars, they may not be excluded from SNAP. If the funds originate from a public source, but are paid to the household through an intermediary, they cannot be excluded.

Example

If monthly universal basic income payments are funded from a mix of government and private sources and if the District chooses to exclude those payments from counting as income in TANF, those payments can be excluded from SNAP.

What to take away

The District can choose to exclude certain types of income from SNAP if it excludes them from TANF cash assistance or Medicaid, within certain limits listed above. In particular, regular payments from a government source cannot be excluded in SNAP unless they are partially privately funded.

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3. Is the benefit provided as an in-kind benefit?

Policy

In-kind benefits are those for which no monetary payment is made on behalf of a household. They include such things as meals, clothing, or produce from a garden.

What to know

If a gain or benefit to a household is considered an in-kind benefit, it will be excluded when determining SNAP eligibility and benefit amounts.

Example

If a family receives diapers from a diaper bank, this is considered an in-kind benefit and is excluded from income in SNAP. If a family is given cash to buy diapers, it is counted as income for SNAP.

What to take away

If benefits are provided in the form of nonmonetary, in-kind benefits, they are excluded from income in SNAP.

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4. Is the benefit a gift card?

Policy

Gift cards are treated differently for SNAP eligibility and benefit determinations depending on the type of gift card and whether it is considered a nonrecurring lump-sum payment or a recurring payment.

Federal SNAP guidance discusses two types of gift cards: establishment-specific gift cards and prepaid credit card company gift cards.

- Establishment-specific gift cards can only be used at the establishment and only until the dollar amount on the card is spent. A Best Buy gift card is an example.
- Prepaid credit card company gift cards are a type of debit card generally issued by a financial institution or credit card company that can be spent the same way as cash. A Visa gift card is an example.

One-time (nonrecurring) payments in the form of an establishment-specific gift card are not counted as income for SNAP. Recurring payments on an establishment-specific gift card would count as income for SNAP. Any payments on a credit card company gift card would count as income for SNAP.

What to know

- If a payment is made in the form of a gift card, it may be considered differently for SNAP purposes.
- In particular, a one-time (nonrecurring) payment in the form of an establishment-specific gift card is not counted as income for SNAP.

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Examples

- If a family receives a one-time gift card to a specific establishment, and that family applies for SNAP, the one-time gift card amount would not count as income for SNAP.
- If a family receives an establishment-specific gift cards monthly or bimonthly, these cards would be considered recurring payments and would count as income for SNAP.

What to take away

One-time (nonrecurring) payments in the form of an establishment-specific gift card are not counted as income for SNAP.

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5. Is the benefit considered to be a vendor payment?

Policy

A vendor payment is a payment made to a third party on behalf of a household. An example of a vendor payment is a shelter payment made on behalf of a household paid directly to the household's landlord or utility provider.

Only certain types of PA and GA vendor payments are excluded from income in SNAP. PA means any of the following programs authorized by the Social Security Act: old-age assistance; TANF; aid to the blind; aid to the permanently and totally disabled; and aid to aged, blind, or disabled. The only types of PA vendor payments that are excluded from income are those for medical assistance, childcare assistance, energy assistance, housing assistance made through a State or local housing authority, and emergency and special assistance.

GA means a form of assistance, excluding in-kind assistance, financed by State or local funds as part of a program that provides assistance to cover living expenses or other basic needs intended to promote the health or well-being of recipients. Most vendor payments made under a State or local GA program are excluded from income in SNAP, except for some vendor payments for housing.

What to know

- Vendor payments paid directly to a third party on behalf of the household can be excluded from income in SNAP, depending on what they are for.
- For example, if a payment from a local housing authority pays the household's rent directly to the landlord, that payment is excluded.

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Examples

- A PA payment made to a childcare provider to provide daycare for a SNAP household member is considered an excluded PA vendor payment.
- A GA housing assistance payment made to a landlord from a local housing authority is considered an excluded GA vendor payment.

What to take away

Vendor payments, including PA and GA vendor payments, may be excluded from income in SNAP depending on what they are. Please contact ESA at esapolicy@dc.gov with any further questions about PA and GA vendor payments in the District.

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6. Is the benefit a one-time payment or recurring?

Policy

If the payment is considered a one-time (or nonrecurring) lump-sum payment, it will receive different treatment under SNAP income rules than payments that are considered recurring or ongoing.

What to know

One-time payments are not counted as income for SNAP.

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Examples

- Nonrecurring lump-sum payments include income tax refunds, rebates, or credits; retroactive lump-sum Social Security or SSI payments; lump-sum insurance settlements; refunds of rental security deposits; and one-time stipends.
- Recurring payments include monthly public assistance grants and two or more anticipated stipends.

What to take away

One-time (nonrecurring) lump-sum payments are not counted as income for SNAP.

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7. Is the benefit provided infrequently or irregularly?

Policy

Any income received too infrequently or irregularly to be reasonably anticipated is excluded, but only if it is \$30 or less per quarter. If the household could reasonably anticipate that it will continue to receive income from a particular source over the next 3 months, even if that income is less than \$30 over that period, that income is not excluded.

What to know

Small amounts of income are excluded from SNAP if they are provided too infrequently or too irregularly to be reasonably anticipated.

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Example

If an individual received a \$20 award from work last month but they cannot reasonably anticipate whether they will receive another such award in the next 3 months, then the award payment would not count as income for SNAP.

What to take away

Income received too infrequently or irregularly to be reasonably anticipated is excluded, but only if it is \$30 or less per quarter.

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8. What is the source of the funds?

Policy

When considering the funding source of the benefits, it is important to ask the following two questions:

- Is it privately funded? Payments the District [excludes from income in TANF or Medicaid](#) may also be excluded from income in SNAP, but only if they meet certain parameters. One of those parameters is that they must be at least partially privately funded benefits.
- Are funds from a [private charitable organization](#)? Cash payments from a private charitable organization can be excluded from income in SNAP, but only if they are \$300 or less per quarter.

What to know

Whether a benefit is exclusively government funded, is privately funded, or funded from a private charitable organization can have an impact on whether it is counted as income for SNAP.

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Examples

- Universal basic income payments that are at least partially privately funded could be excluded from income in SNAP if the District excludes those payments from TANF or Medicaid.
- Cash donations from a private nonprofit charitable organization of \$295 a quarter would be excluded from income in SNAP.

What to take away

The source of the funds matters in two specific situations: privately funded payments that are also excluded from TANF or Medicaid and payments from private nonprofits of \$300 or less per quarter.

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9. What is the value of the benefit?

Policy

- As discussed above, there are two types of income in which its value determines whether it is excluded:
- Any income received too infrequently or irregularly to be reasonably anticipated is excluded, but only if it is \$30 or less per quarter.
- Cash donations from a private nonprofit charitable organization of \$300 or less per quarter are excluded.

What to know

The value of the benefit comes into play in two situations: if income is received too infrequently or irregularly to be reasonably anticipated or if the benefit is in the form of cash donations from a private nonprofit charitable organization.

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Examples

- If a household receives inconsistent payments that are not anticipated to be more than \$30 over the course of 3 months, those payments are excluded.
- Cash donations from a private nonprofit charitable organization of \$295 a quarter would be excluded from income in SNAP.

What to take away

When looking at cash donations from private nonprofit charitable organizations and infrequent or irregular benefits, SNAP applies thresholds to the value of the benefit to determine if they are excluded.

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10. Would the benefit be considered income or a resource?

Policy

The term “resources” (often referred to as assets) refers to liquid resources, such as savings accounts, and nonliquid resources, such as land and property (except for the household’s primary residence and lot).

[SNAP resources rules](#) specify that certain items must be considered resources for SNAP. Under these rules, all households not categorically eligible for SNAP are subject to a resource test as a condition of eligibility. *However, categorically eligible households, which represent the vast majority of SNAP households in the District, do not have to meet the SNAP resource test.*

What to know

- Some items that are excluded from being counted as income in SNAP may still count as a resource for SNAP purposes.
- For example, one-time lump-sum payments are excluded from income but count as resources for SNAP.
- However, most families are not subject to a SNAP resource test in the District.

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Examples

- Nonrecurring lump-sum payments are excluded from income in SNAP but are counted as resources for SNAP in the month the payment is received. (However, as noted above, most households in the District are not subject to a resource test.)
- Nonrecurring lump-sum stimulus payments authorized under the Coronavirus Aid, Relief, and Economic Security Act, also known as CARES Act, are excluded from income and also specifically excluded from resources for 12 months following receipt of the payment.

What to take away

Be aware that some payments excluded from income in SNAP may be counted as resources, but most households in the District are not subject to a resource test.

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11. Are the resources available to the household?

Policy

Resources that are unavailable to the household do not count against the resource test in SNAP. The premise is that if the household cannot access these funds to purchase food, the funds should not count toward the household's resources when determining SNAP eligibility.

It is worth noting that some District programs provide funds to participants in such a way that those funds are available only for specific purposes while individuals participate in the program (e.g., rent payments) or the funds are not available until participants "graduate" from the program. In these situations, the funds considered unavailable are excluded from resources in SNAP. Under SNAP rules, the District can also exclude deposits in individual development accounts from resources in SNAP if the District excludes them from resources in TANF cash assistance or Medicaid.

However, as noted above, most households in the District are not subject to a resource test in SNAP.

What to know

Whether funds are considered available to the household can affect whether those funds are counted as resources for SNAP. However, as noted above, most households in the District are not subject to a resource test.

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Examples

- Funds in certain types of irrevocable trusts and escrow accounts are excluded from resources in SNAP because they are considered unavailable to the household.
 - A trust refers to an agreement under which one party, known as a trustor, gives another party, the trustee, the right to hold title to property or assets for the benefit of a third party.
 - Escrow refers to a financial agreement in which a neutral third party holds assets or funds before they are transferred from one party to another.

What to take away

Resources that are inaccessible to the household do not count against the resource limit in SNAP.

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