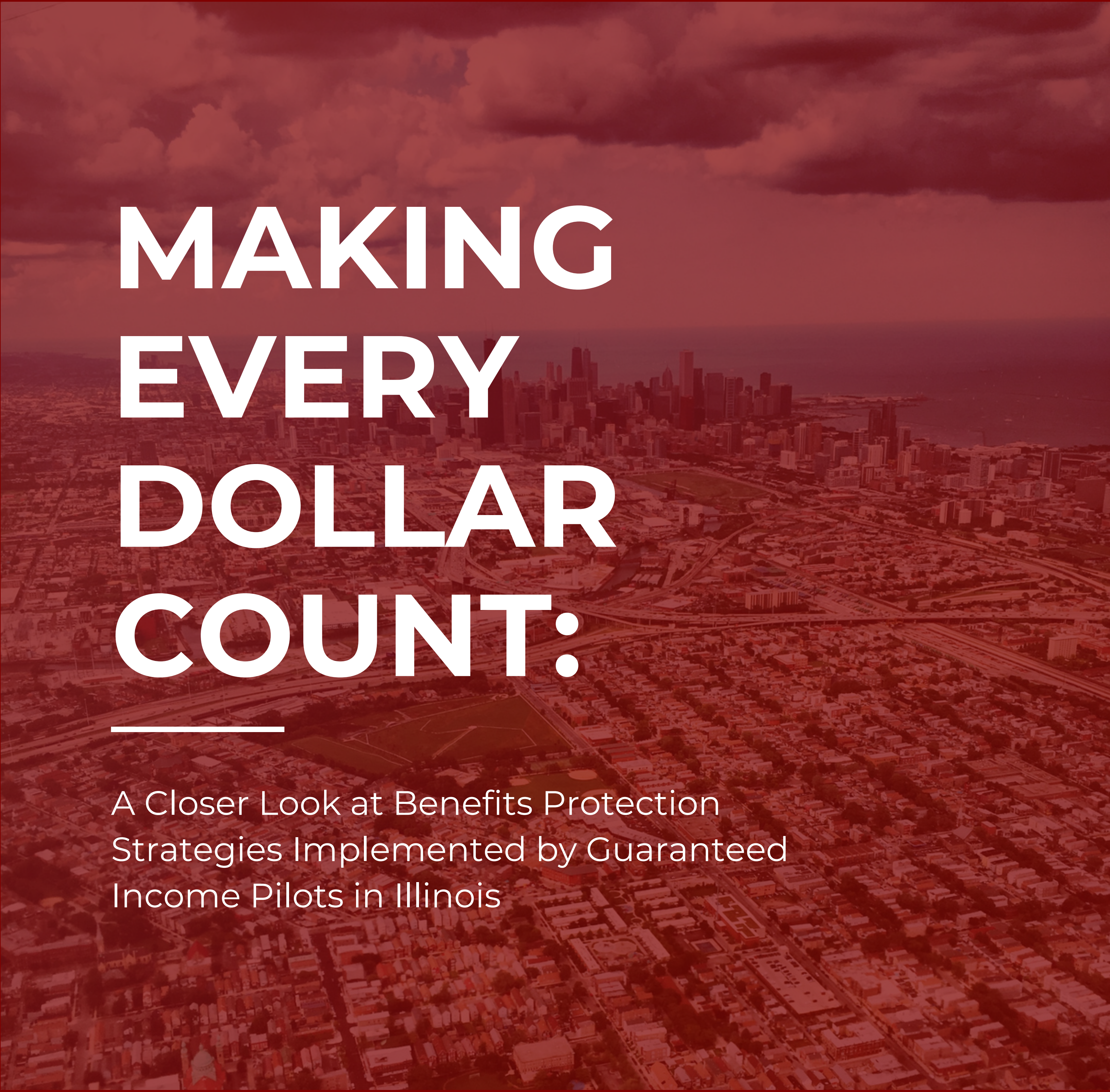

MAKING EVERY DOLLAR COUNT:

A Closer Look at Benefits Protection Strategies Implemented by Guaranteed Income Pilots in Illinois

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Introduction

The Chicago Resilient Communities Pilot (CRCP) was the largest guaranteed income pilot in the country by reach with 5,006 families enrolled. Not only was the reach of the pilot impressive, CRCP administrators have notably achieved more success protecting public benefits for participants than almost any other pilot at the time. The successful protection of public benefits for the Chicago pilot is in large part due to the groundwork done in Illinois and around the country by other pilots in previous years.

Guaranteed income has been gaining in popularity in recent years. Today, over 150 guaranteed income pilots are underway or have been completed in the United States. The existing social safety net is insufficient in responding to and stemming the tide of rising income inequality and poverty, and guaranteed income is a promising solution. It is based on the simple notion that people who are experiencing poverty and income insecurity know best what they need to support themselves and their families.

A guaranteed income is meant to supplement rather than replace public benefits that an individual is receiving. Therefore, advocates, researchers, pilot administrators and policymakers supporting guaranteed income pilots around the country have made protecting public benefits for people receiving direct cash a priority. The majority of pilots underway in the United States have taken steps to mitigate against benefits reduction or loss for participants enrolled. Pilots have employed a wide range of benefits protection and mitigation strategies with varying degrees of success.

This brief seeks to document the benefits protection strategies employed by two Illinois-based guaranteed income pilots, Every Dollar Counts and the Chicago Resilient Communities Pilot.

The Importance of Benefits Protection

A guaranteed income should increase economic security and improve overall well-being. However, if cash received from a guaranteed income pilot supplants rather than supplements public benefits, a person could be left worse off. Public benefits programs have a complex set of eligibility criteria and requirements related to income and resources, and the process to apply for and maintain benefits can be arduous. Benefits cliffs exist in the majority of means-tested public benefits programs and continue to be a deterrent to wage growth and wealth creation for many families across the United States.

> **"Benefits cliffs continue to be a deterrent to wage growth and wealth creation for many families.**

Many people and families likely to participate in guaranteed income pilots are already receiving some combination of public benefits. Without intervention, cash received through guaranteed income pilots could affect eligibility for means-tested benefit programs and can trigger a benefits cliff or loss of public assistance, leaving families worse off financially. This may not only discourage participation in guaranteed income pilots but could also counteract the purpose of the program.

Every Dollar Counts Benefits Protection Strategy

Every Dollar Counts (EDC) was the first large-scale, rigorous study of guaranteed basic income in the United States. The research study was implemented in Illinois in partnership between OpenResearch, The University of Chicago Inclusive Economy Lab, and Heartland Alliance. Heartland Alliance implemented the guaranteed income program and assisted with benefits protection, and OpenResearch and a team of researchers from the University of Illinois, University of Michigan, University of California, Berkeley, and the University of Toronto conducted the evaluation. The Inclusive Economy Lab assisted with administrative data acquisition and analysis as well as benefits protection.

Every Dollar Counts was a randomized controlled trial (RCT) to inform academic, policy, and political debates on guaranteed basic income. The study includes extensive quantitative measurement of outcomes related to individuals' economic, social, and emotional well-being in addition to in-depth qualitative interviews.

The study recruited 3,000 participants across nine counties in Illinois and nine counties in Texas, of which 1,000 participants received $1,000 per month for three years. The first payments went out to EDC participants in fall of 2020 and the final payments were received by participants in October 2023. Every Dollar Counts was an entirely privately funded pilot that brought $20 million in direct cash transfers to Illinois residents.

Commitment to protecting benefits

Researchers and pilot administrators were committed to ensuring that participation in the pilot did not interfere with any current or future eligibility for public benefits (e.g. subsidized housing, Medicaid). Researchers estimated that at least half of the people in the treatment group could have one or more of their existing benefits impacted without benefits protection. It was extremely important to all of the project leads to make sure that participants enrolled in the study were not left worse off due to their participation in Every Dollar Counts.

Pilot administrators were particularly concerned about benefits where the value of the benefit could not be easily replaced by the cash. Cash is not an efficient replacement for Medicaid or Child Care Assistance, and the loss of subsidized housing (e.g. Housing Choice Voucher (HCV) formerly Section 8) could have negative long term consequences. In Chicago, for example, the Chicago Housing Authority is required to have a waitlist to administer their public housing and HCV programs and there are many more families who need rental assistance than there are resources available. Currently, the HCV waitlist is closed, so if a participant was to become ineligible for the program due to their participation in the pilot, they may not be able to get on the waitlist to reapply.

Pilot administrators were committed to not move forward with the pilot without a robust benefits protection strategy that prioritized the protection of benefits that could not easily be replaced by the cash.

Background research & learnings that informed benefits protection strategy

In September of 2016, OpenResearch launched a small feasibility study in Oakland, CA, that ran for one year. The feasibility study included fewer than 10 individuals (including treatment and control), and participants in the treatment group received $1,500 per month. OpenResearch also conducted a second pilot with 80 individuals in 2018, although the amount of money distributed was smaller during this pilot ($50/month for one year). Since there were no benefits protections in place at the time, no one was included in the feasibility study if they received benefits that would be impacted.

At the time of the feasibility study, there were almost no examples of guaranteed income pilots up and running in the United States, with one notable exception, Baby's First Years. Baby's First Years is a longitudinal study of the impact of monthly, unconditional cash gifts to low-income mothers and their children starting at birth. One thousand eligible mothers were recruited in hospital maternity wards across four sites — New York City, greater New Orleans, Minneapolis/St. Paul, and the Omaha metropolitan area. Mothers who consented to participate in a research study and agreed to receive an unconditional monthly cash gift were randomized to receive a high-cash gift of $333 per month or a low-cash gift of $20 per month.

Families received the monthly cash gift for the first 76 months of their child's life. Recruitment of mothers began in May 2018 and ended in June 2019. All of the money for the cash gifts was provided by charitable foundations and mothers were given the gifts regardless of whether or not they participated in research activities.

Leading up to the recruitment of study participants for Baby's First Years, the researchers leading the project did extensive policy research to ensure that the public benefits that families participating in the study are eligible for would be minimally impacted. Two of the four program sites, Nebraska[1] and Minnesota,[2] have legislation in place to protect benefits to the extent allowable by federal law, including TANF, SNAP, LIHEAP, and child care assistance from being impacted by the cash gifts that participants receive. New York City and New Orleans relied on administrative rulemaking processes to exempt the study's cash gifts from consideration for determining eligibility and benefit levels for a number of public benefits.[3]

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[1] LB1081 was signed into law March 30, 2016.

[2] HF2729 a supplemental budget bill was signed into law June 1, 2016 which included amended chapter 189, article 15, section 29

[3] For more detail see Louisiana Register Vol. 42, No. 10 October 20, 2016, p. 1650.

Key learnings from Baby's First Years

To the extent allowed by federal law, state and local agencies have authority to determine what is defined as countable income for the purposes of determining eligibility for key public benefit programs such as Temporary Assistance for Needy Families (TANF), Low Income Home Energy Assistance Program (LIHEAP),and child care assistance.

What qualifies as countable income for public benefits may depend on both the amount and periodicity of the cash transfers. For example, some one-time lump sum payments may not qualify as countable income for some public benefits programs.

States may have rules regarding countable income or benefits eligibility in state statute or administrative rule that prevent state and local agencies from protecting benefits without policy changes.

Pursuing administrative rule changes or passing legislation are both potential strategies for protecting some public benefits for participants in guaranteed income pilots but the local context matters. Either strategy requires significant political will and support.

Some benefits may not count non-taxable income, and one of the ways that income could be designated as non-taxable is if it is a gift, per the IRS gift definition.

Determining if Baby's First Years approach could work for Every Dollar Counts

Every Dollar Counts administrators further researched the policy mechanisms that Baby's First Years leveraged to protect benefits to better understand if the strategy could be replicated in the two states EDC planned to launch the project. EDC project leads relied on numerous conversations with attorneys, policy experts, and public benefits administrators to better understand and validate the strategy.

IRS gift designation - EDC administrators consulted numerous attorneys to determine if the prevailing interpretation of IRS code was one that validated the strategy of designating cash transfers received through EDC as gifts. Although the IRS does not provide individual rulings on the gift definition, attorneys from the project did speak off the record with IRS staff describing the structure of Every Dollar Counts and discussing the particular elements of the project design that reinforced that the direct cash transfers would be considered gifts per IRS code. Specifically, the following elements emerged as key considerations for meeting the IRS gift definition:[4]

- **Program structure** - The organization or entity providing the direct cash transfer should be different from the organization conducting the research. When a charitable non-profit provides unconditional cash to a person with low-income in furtherance of its charitable purposes, those direct cash transfers are made out of "detached and disinterested generosity."[5]

- **Unconditional cash transfer** - In order for a cash transfer to be considered a gift, it may not be conditioned on any performance or action of the recipient. So, the research component of the pilot must be voluntary and the cash transfer must not be contingent on participation in the research or any other activities.

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[4] For complete definition see (26 U.S.C. § 102 (Gifts and Inheritance)) and consult IRS FAQ on gift taxes.

[5] A seminal case in this area states that a gift, "proceeds from a detached and disinterested generosity … out of affection, respect, admiration, charity, or like impulses." See Commissioner v. Duberstein, 363 U.S. 278 (1960). This same case provides that payments that proceed primarily from "the constraining force of any moral or legal duty" are not gifts.

SNAP - Through conversations with Baby's First Years administrators and further policy research, the EDC project team gained clarity on the policy mechanism used to exclude cash received through a guaranteed income pilot for the purposes of SNAP eligibility and benefit determinations. Per federal law[6] and corresponding regulation[7] states have the option to determine what type of income they exclude for the purposes of determining TANF eligibility.[8] A state also has the option to exclude some types of income and resources by aligning SNAP policy with TANF or Medicaid policy. So if cash received through a guaranteed income pilot is excluded for the purposes of determining TANF eligibility, it may also be excluded for the purposes of determining SNAP eligibility and benefit amounts for privately funded pilots.

Although the policy mechanism was clear, there was an effort within the federal administration at the time to "crack down" on categorical eligibility and the flexibility states have to extend eligibility for food assistance.[9] EDC administrators had numerous meetings with staff from Food and Nutrition Services (FNS) Regional Offices at the time. Although the policy mechanism seemed like a promising path to protecting SNAP benefits, it relied on support from local administrators at a time when federal FNS administrators were actively working to restrict state flexibilities.

Public Housing - Through policy research and extensive conversations with public housing authorities (PHAs) in potential program sites, EDC administrators confirmed that at the time, most PHAs did not have the authority to exclude cash received through guaranteed income pilots for purposes of program eligibility determinations.[10] Public housing authorities (PHAs) participating in HUD's Moving to Work Demonstration (MTW), however, did have the authority to exclude income from GI pilots through their MTW plans. The PHA would be required to amend their MTW plan to include an exclusion for guaranteed income pilots and all plans would need to be approved by HUD.

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6 7 U.S.C. § 2014(d)(18)

7 7 CFR 273.9(c)(19)

8 There are some limitations to the use of income exclusions by way of TANF. For example, regular payments from a government source may not be excluded for the purpose of determining TANF eligibility, which may encompass guaranteed income pilots that are not privately funded.

9 See Proposed Rule: Revision of the Categorical Eligibility in the SNAP (July 24, 2019).

10 PHAs can enact "permissive deductions" that would not impact income eligibility for public housing, but would impact the calculation of the household's rent. The new Housing Opportunity Through Modernization Act (HOTMA) rule clarifies the use of permissive deductions. See 88 FR 9600.

For PHAs not participating in the Moving to Work Demonstration, EDC administrators tried to make the case that the income received from the pilot could be excluded based on existing federal regulation. HUD excludes, "Temporary, nonrecurring or sporadic income (including gifts)," from annual income determinations.[11] Participants enrolled in EDC would be receiving monthly cash payments for 36 months and HUD and PHA administrators were not sufficiently convinced that a three-year program was temporary or sporadic. It is worth noting that the new HOTMA rule, which is effective January 1, 2024, changes this definition.[12]

EDC administrators reached out to a total of 38 housing authorities across the two states to discuss the possibility of using existing flexibility to exclude pilot income but PHA directors not part of the Moving to Work Demonstration felt they did not have the authority to be flexible. The Chicago Housing Authority was the only PHA participating in MTW at the time.

Supplemental Security Income (SSI) - Despite numerous meetings with policy experts, EDC administrators were not able to identify a clear path or precedent for benefits protection for a privately funded pilot. Cash received from Every Dollar Counts would count against the resource and income limits for the program and participants would be at risk of losing the benefit entirely. SSI is typically difficult for people to attain and would require a new application and lengthy evaluation process to resume after the pilot.

Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)- WIC has a broad definition for countable income and EDC administrators were not able to identify a clear path or precedent for benefits protection. Additionally, the share of prospective participants receiving WIC was very small[13] and the benefit levels for the program were low. In fact, the program uptake rates for WIC in Illinois were among the lowest in the country.

Heartland Alliance policy staff further researched Illinois' state statute, administrative code, and state department policy guidance to better understand eligibility criteria for a set of priority public benefits identified by the EDC project team. Policy staff also researched how a cash transfer received via Every Dollar Counts would be treated for eligibility and benefit amount determinations absent any policy intervention.

[11] 24 CFR § 5.609(c)(9)

[12] See 88 FR 9600. In the final rule HUD defines nonrecurring income as income that will not be repeated in the coming year.

[13] In Illinois, only 30 families in the treatment group were receiving WIC at enrollment.

How benefits protection may affect the relevance of the study

Although the Every Dollar Counts researchers expected that some (but not all) of the benefits the project team sought to protect might be replaced by the cash transfer received through the pilot, there were several reasons researchers believed that protecting benefits should not affect the relevance of the study or its ability to inform future policy.

Individuals in households currently receiving SSI or other Social Security benefits were ineligible to participate in the pilot as the barriers to protecting the public benefit seemed insurmountable. Individuals in households with a Housing Choice Voucher or otherwise receiving public housing assistance were similarly ineligible. Advocacy to protect housing benefits was time and labor intensive, and support from the nine different Housing Authorities in Illinois was not possible to obtain. Furthermore, if participants become ineligible for SSI or a Housing Choice Voucher as a result of cash they received through the pilot, they may not be able to get the benefit back at the end of the program. Waitlists for the Housing Choice Voucher program are extremely long and the process to reapply for SSI is incredibly burdensome to participants. Pilot administrators wanted to make sure that participation in Every Dollar Counts did not leave any participant worse off.

Because the percentage of eligible individuals receiving a Housing Choice Voucher or other public subsidized housing assistance was very low, researchers believed that excluding voucher-holders from the sample would not introduce meaningful selection bias. Unlike housing assistance, however, other benefits (such as Medicaid and SNAP) do not have limited availability. Forcing prospective participants to choose between taking up the guaranteed income payments and continuing to receive other benefits like health care or child care assistance would likely lead to nonrandom participation and introduce sources of bias.

Why pursue a legislative strategy?

Based on the learnings from Baby's First Years and the Illinois-specific policy research it was clear that state agencies already had significant authority to protect benefits. Administrative advocacy and rulemaking under the departments' existing authority could achieve the benefits protections EDC administrators were seeking. The team opted for a legislative strategy instead for a few key reasons.

Members of the project team had experience advocating with the Illinois Department of Human Services (IDHS) and anticipated that state department leaders would likely be supportive of the project. Regardless of support within the agency, IDHS consistently lacks capacity to take on new projects, and projects that are less urgent or non-essential are frequently sidelined or deprioritized. Pursuing a legislative strategy was a way to get higher on the Department's priority list and create some urgency and a more certain timeline for implementation.

When pilot administrators started planning and developing a benefits protection strategy in 2018, Illinois had a Republican Governor, Bruce Rauner, whose position on guaranteed income and EDC was uncertain. The project team, however, was able to identify allies within the administration that were supportive of the project. With a Democratic supermajority in both chambers of the Illinois General Assembly, a decision was made to pursue the legislative strategy to build support for the pilot while advancing the bill. The supermajority could be the backstop against the lack of support from a Republican administration.[14]

Each of the public benefits the project team identified as high and medium priority required a different approach, and the administrative authority to protect each benefit did not lie within one specific state agency. A legislative approach was more directive and all encompassing. That said, the project team did a significant amount of administrative advocacy with the various state agencies both before and after the passage of the bill. Advancing the bill was only a piece of the overall strategy.

Finally, Heartland Alliance's policy staff had extensive legislative advocacy and public benefits policy expertise. As a key partner on EDC, Heartland Alliance's policy team had significant capacity it was able to lend to the project to lead the benefits protection strategy in Illinois. Heartland Alliance policy staff developed a legislative advocacy strategy and supported that strategy at every step along the way - from bill drafting and direct lobbying to monitoring implementation of the bill once it was signed into law.

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[14] JB Pritzker defeated Republican incumbent Bruce Rauner in the general election on November 6, 2018, and took office on January 14, 2019 just prior to the introduction of SB1735. Even with the administration change, the project team decided to pursue the legislative strategy.

Bill Drafting - SB1735

Heartland Alliance policy staff drafted bill language inspired by Nebraska and Minnesota that would direct state agencies to use the flexibility afforded to them under federal law to exclude income received through time-limited pilots like Every Dollar Counts for the purposes of determining eligibility and benefit amounts. The bill was drafted to apply to any public benefit program referenced in the Illinois Public Aid Code which included all of the benefits that pilot administrators identified as priority benefits to protect, including, but not limited to, Medicaid, TANF, SNAP, and the Child Care Assistance Program. Bill language was drafted in consultation with staff from the Center on Budget and Policy Priorities' income support team and the Shriver Center on Poverty Law.

It was important to the project team to introduce a bill that would not only protect benefits for people enrolled in Every Dollar Counts but would also support and facilitate benefits protection for future guaranteed income pilots or demonstration projects of other policy innovations. The language was drafted in a way that was overly broad in an effort to increase the likelihood that a future pilot would be able to secure benefits protection for participants under the law.

SB1735 as introduced

Section 5. The Illinois Public Aid Code is amended by changing Section 1-7 as follows:

(e)(1) Notwithstanding any other provision of this Code, and to the maximum extent permitted by federal law,[15] for purposes of determining eligibility and the amount of assistance under this Code, the Illinois Department and local governmental units shall exclude from consideration, for a period of no more than 60 months, any financial assistance, including wages, cash transfers, or gifts, that is provided to a person who is enrolled in a program or research project that is not funded with general revenue funds and that is intended to investigate the impacts of policies or programs designed to reduce poverty, promote social mobility, or increase financial stability for Illinois residents if there is an explicit plan to collect data and evaluate the program or initiative that is developed prior to participants in the study being enrolled in the program and if a research team has been identified to oversee the evaluation.

(2) The Department shall choose State options and seek all necessary federal approvals or waivers to implement this subsection.

Section 99. Effective date. This Act takes effect upon becoming law.

[15] A number of legislators were particularly concerned that the bill would make the state responsible for the cost of the federally funded public benefits if the state agencies extended eligibility beyond the scope of what was permitted under federal law. This language was especially important to convince decision makers that the intent of the bill was not for the state to incur the cost of the public benefits.

Building support from IDHS

EDC gained immediate support from Illinois Department of Human Services (IDHS) leadership. IDHS was both eager to be on the leading edge of the movement for a guaranteed income and better support the people and families the agency serves. Staff were also particularly interested in having the research findings inform and strengthen IDHS policy decisions and administration of existing programs and services.

Regardless of the support the project received early on from IDHS, staff leading key benefit programs including TANF, SNAP and Medicaid still required convincing that protecting benefits for Every Dollar Counts participants was possible and within their authority/allowable by federal law. The most persuasive argument was pointing to the four other states that had taken similar administrative and/or legislative action to protect benefits of mothers enrolled in Baby's First Years. Pilot administrators connected IDHS staff with state agency administrators in Minnesota to confirm the policy mechanisms used to protect benefits and share lessons learned.

Identifying Lead Sponsors

The project team identified Omar Aquino[16] and then Representative Delia Ramirez[17] as potential lead sponsors because of their positioning, backgrounds, and their leadership expanding access to health care and other public benefits for Illinois families. When Sen. Aquino and Rep. Ramirez were initially approached about the bill idea, they were both eager to take on the role of lead sponsor and help move the bill through the General Assembly.

[16] Omar Aquino is the Illinois State Senator of the 2nd District. Sen. Aquino was a new member of the Senate leadership team at the time. He has led on a wide variety of issues from criminal legal system reform, eliminating driver's license suspension for economic reasons, expanding eligibility for and increasing the state Earned Income Tax Credit and increasing access to health care and social services for immigrants. Prior to becoming a state legislator he had experience working as a bilingual case manager.

[17] At the time Delia Ramirez was the newly elected State Representative of the 4th House District of Illinois. Rep. Ramirez was a former social services administrator, policy advocate and community organizer who championed housing justice and health care for all in the Illinois General Assembly. Rep. Ramirez was a champion for working families and throughout her career fought for access to public benefits and social services for her community. She was a member of the Appropriations - Human Services committee and an early supporter of guaranteed income.

Lobbying the Bill

Senate Bill 1735 was introduced by Sen. Aquino on February 15, 2019 and was subsequently assigned to the Senate Human Services Committee. Heartland Alliance policy staff focused on lobbying members of Senate Leadership that were likely supportive as well as members of the Committee.[18]

The ranking Republican on the Senate Human Services Committee was not supportive of the bill from the beginning. He believed that a vote in support of the bill would be a vote in support of guaranteed basic income which he did not support. He was particularly concerned that families enrolled in the pilot could be receiving both unconditional cash and benefits at the same time which he believed to be “unfair.”

At the time, few legislators had formulated a position on guaranteed income so lobbying the bill became an opportunity to talk more about the concept as well as the broader potential benefits of a rigorous social policy research project that the bill would help facilitate. The talking points that generated the most support for SB1735 included the following:

- The bill will enable a team of local and national researchers to move forward with a privately funded research study that will infuse $20 million of cash into low-income communities in Illinois.
- Facilitating social policy research pilots will both directly help middle and low-income residents in the state and place Illinois at the forefront of evidence-based policy innovation.
- Losing critical benefits may leave people worse off financially, discourage people from participating in the pilot and the study, and consequently make it impossible to rigorously measure the cost and benefits of a new policy.
- The bill will not impose new costs on the state. It does not commit any state general revenue funds to pay for potential pilots and only seeks time-limited exemptions allowable by federal law.[19]

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[18] Prior to the committee, the bill picked up a few key sponsors from members of the Committee and Senate Leadership, including Senate Majority Leader Kimberly Lightford and Senate Majority Caucus Chair and ranking Democrat on the Human Services Committee Mattie Hunter.

[19] This was particularly important for certain legislators who were concerned that if the State ran afoul of federal law it may be required to incur the cost of the benefits that would otherwise be federally funded.

Those key talking points were reinforced through committee testimony, lobbying members of the General Assembly, ongoing conversations with legislative liaisons and state agency leadership, and during the floor debates.[20]

Lobbying Materials
SB1735

Fact sheet & FAQ

Committee Testimony

Floor Guide

Legal & Budgetary Overview[21]

SB1735 passed the Senate on a party line vote on April 10, 2019 with all of the Democrats voting yes and all of the Republicans voting no or not voting. The bill was then picked up by Rep. Delia Ramirez in the House. The majority of the legislators who sponsored the bill in the House were members of the Progressive Caucus. Similar to the Senate, the bill advanced out of the House Human Services Committee and off of the House floor on May 23, 2019 on a party line vote. The Governor signed the bill into law on August 16, 2019.

SB1735 Implementation - Public Act 101-0415

EDC administrators continued conversations with IDHS through the summer leading up to the pilot launch. Despite ongoing conversations with IDHS, there was still uncertainty about whether or not SNAP benefits would be able to be protected based on communication with Food and Nutrition Service (FNS)[22] staff. It was not until days before the pilot launch that administrators received final confirmation from IDHS that the agency was able and willing to protect SNAP benefits for pilot participants.

[20] For transcripts of the Senate and House floor debate see: Senate 4/10/19, p. 120 and House 5/23/19, p 65.

[21] The Legal and Budgetary Authority Overview was primarily used as a tool for administrative advocacy with state agencies.

[22] The Food and Nutrition Service (FNS) is an agency of the United States Department of Agriculture. The FNS is the federal agency responsible for administering the country's nutrition assistance programs including SNAP.

With approval from FNS, IDHS staff amended the TANF state plan to exclude EDC income as countable income for the purposes of determining TANF eligibility. Per federal statute and corresponding regulation,[23] the state was then able to extend the exclusion of EDC income for the purposes of SNAP eligibility determinations.[24] To help ensure that IDHS and HFS[25] leadership, caseworkers doing benefits enrollment and eligibility determinations, and pilot participants all had the same information and understanding of the policy, IDHS updated their internal policy and drafted a letter for all EDC participants. IDHS updated the Cash, SNAP, and Medical Manual with Manual Release #20.25 which explicitly excludes money received from the Every Dollar Counts for eligibility and benefit amount determinations for MAGI Medical Programs, SNAP, TANF and AABD cash.[26]

Additionally, IDHS Secretary Grace Hou drafted a letter addressed to participants of the pilot. Participants could use the letter as supporting documentation during the benefits application or redetermination processes or provide it upon request or as needed to advocate on their own behalf with a caseworker. The letter included additional clarification on benefits that should not be impacted by EDC payments including Head Start, Early Head Start, Child Care Assistance, and Low Income Home Energy Assistance Program (LIHEAP). It also mentioned an example of benefits that may be impacted - Aid to the Aged, Blind, and Disabled or AABD Medical. The letter also included contact information for a Heartland Alliance staff member that could answer additional questions regarding benefits impact.

The success of the legislative strategy required significant administrative advocacy and follow-up with each benefit administering agency through implementation. Although the benefits protections could have been achieved through an administrative strategy alone, passing legislation proved worthwhile. Not only did legislative advocacy help build support for guaranteed income among state lawmakers and administrators, the law established precedent and foundational benefits protections for future Illinois pilots.

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23 7 CFR 273.9(c)(19)

24 Despite the lack of support within the federal administration at the time, IDHS staff were able to garner support from regional FNS administrators and the first payments were issued to EDC participants in November of 2020. The USDA under the Biden administration subsequently withdrew the SNAP proposed rule on categorical eligibility.

25 The Illinois Department of Healthcare and Family Services (HFS) is responsible for providing healthcare coverage for adults and children who qualify for Medicaid. While medical programs are administered through HFS, the public may apply for medical assistance through the Illinois Department of Human Services.

26 AABD cash or Aid to the Aged, Blind or Disabled, is a cash benefit available to people who are age 65 or older, or who are under age 65 and are blind or disabled as defined by the Social Security Administration.

Chicago Resilient Communities Pilot Benefits Protection Strategy

The Chicago Resilient Communities Pilot (CRCP) was a guaranteed income pilot established by former Mayor of Chicago Lori Lightfoot and the Department of Family and Support Services (DFSS) to tackle poverty and put residents at the center of the economic recovery from the COVID-19 pandemic. The pilot was a signature investment within the landmark Chicago Recovery Plan, which combined $567M in federal American Rescue Plan Act (ARPA) grant dollars with $660M of local bonds to fund $1.2B in new investments in city programs. Over 5,000 Chicagoans were selected through an open application and a citywide lottery to receive $500 per month for 12 months, with no strings attached.

The Chicago Resilient Communities Pilot was the largest guaranteed income pilot in the country by reach with 5,006 families enrolled. $31.5M in public funding was allocated for the pilot's administration and the City of Chicago also worked with the Inclusive Economy Lab to raise funds from the philanthropic community to support the evaluation.

The goals of the Chicago Resilient Communities Pilot were to:

- **Provide Financial Relief:** Mitigate economic hardships for low-income households who have been hard hit by COVID-19
- **Improve Residents' Well-being:** Improve the financial stability, health, and well-being of program participants and their families
- **Transform Chicago's Human Services:** Improve and promote the City's capacity to create and deliver impactful, inclusive, people-centered anti-poverty programs that build on the existing safety net
- **Build the Field of Practice:** Enable policymakers and advocates across local, state, and federal levels to learn from our pilot, the largest program by reach in the United States

DFSS ran a competitive Request for Proposals process to select GiveDirectly, a nonprofit focused on international and domestic cash transfer programs, as the pilot administrator, plus additional community-based organizations to lead outreach and recruitment activities. Administering the program through a nonprofit not only added meaningful capacity for the program, but also offered administrative benefits such as the ability to use the IRS gift designation and enable participation of undocumented residents.

Commitment to protecting benefits

One of the goals of the Chicago Resilient Communities Pilot was to build on the existing safety net, so it was of utmost importance to the pilot administrators to ensure, where possible, that participating households would not experience a loss or reduction in their existing benefits as a result of participation in the pilot. The income eligibility threshold for the pilot—households at or below 250% FPL[27] — fell within the Treasury's definition of impacted communities for the ARPA SLFRF funds,[28] and there was a high rate of participation in other safety net benefits among the intended beneficiaries.

While administrators of privately funded guaranteed income pilots like Every Dollar Counts have been able to work with state and local agency officials to ensure that cash payments are characterized in a way that does not threaten eligibility, excluding guaranteed income payments from consideration could become more challenging if those payments are publicly funded. An additional set of relevant factors, including the source of funding (i.e. private, type of public, tied to a federally qualified disaster), the frequency or duration with which payments are received (i.e. recurring or lump-sum), the amount of the payments, and the implementation strategy all may impact the ability to protect benefits for pilot participants.

[27] For a single person that would be $33,975 a year or less. For a family of four, the household income would have to be $69,375 or less. For more on HHS 2022 Federal Poverty Guidelines visit the Office of the Assistant Secretary of Planning and Evaluation website.

[28] The Coronavirus State and Local Fiscal Recovery Funds (SLFRF) program, a part of the American Rescue Plan, delivered $350 billion to state, local, and Tribal governments across the country to support their response to and recovery from the COVID-19 public health emergency.

Some local and state agencies were able to ensure benefits protection. Justifications for the benefits protections varied and included reasons such as: a) on the basis of the State legislation, b) because the pilot is a time-bound, 12 month program, c) because it was COVID-19 disaster related, d) because it was funded with a mix of public funds and private philanthropic dollars, and e) a combination of these factors.

Leveraging Illinois law to protect benefits for pilot participants

Despite the added complexity of implementing a benefits protection strategy for a largely publicly funded pilot, existing Illinois law provided pilot administrators a head start. With Public Act 101-0415 in place, administrators were able to work with state agencies to quickly confirm that the cash participants received from the Chicago Resilient Communities Pilot would not be considered for purposes of determining benefits eligibility and calculations for programs covered by the law.

The Illinois Department of Healthcare and Family Services confirmed that for medical programs that are calculated with the IRS's definition of Modified Adjusted Gross Income or MAGI – Medicaid, Children's Health Insurance Program (CHIP), etc. – the cash received by pilot participants would be exempt from income calculations.

The Illinois Department of Commerce and Economic Opportunity determined that cash received by participants would not impact eligibility for LIHEAP/LIHWAP (energy/water assistance), IHWAP (weatherization assistance), or CSBG-funded programs.

The Illinois Department of Human Services confirmed that cash from the pilot could be excluded for consideration when determining eligibility and benefit levels for Aid for the Aging, Blind and Disabled (AABD cash), Child Care Assistance Program (CCAP), and Temporary Assistance for Needy Families (TANF).

One program notably missing from the list was the Supplemental Nutrition Assistance Program (SNAP). Some privately funded guaranteed income pilots like Every Dollar Counts have been able to exclude payments from being considered for SNAP income and eligibility determinations, but the same provisions that provide this flexibility cannot be used for publicly funded programs. Both federal law and regulation explicitly forbid states from using the provision to exclude "regular payments from a government source."[29]

In April 2022, as more publicly funded guaranteed income pilots launched and sought guidance from the Food and Nutrition Service (FNS) to protect SNAP benefits of pilot participants, the agency issued additional policy guidance.[30] The FNS clarified that as long as cash payments received from a guaranteed income pilot are sourced solely from private funds or a mix of private and public funds, and the state had also excluded those payments for the purposes of determining TANF eligibility, the payments could also be excluded for determining SNAP eligibility and benefit amounts. The guidance further clarified that payments funded with funds from a variety of public sources (e.g., state, local, and ARPA dollars) are considered payments from a government source and may not be excluded for SNAP per federal regulation, even if the payments are excluded under TANF.

Administrators worked to secure private funding for the pilot (provided via donations to GiveDirectly, the non-profit program administrator) to ensure that SNAP benefits for pilot participants were protected. The Commissioner of the Chicago Department of Family and Support Services, Brandie Knazze, recognized the importance of securing private support for the pilot as a strategy to protect SNAP benefits for participants and made securing private funding a priority. GiveDirectly fundraised and successfully secured private donations to meet the FNS guidance.

The Illinois Department of Human Services subsequently issued policy guidance confirming that cash received through the Chicago Resilient Communities Pilot would be excluded for eligibility determination for cash, SNAP and medical assistance.[31] Although the confirmation came from Centers for Medicare and Medicaid Services (CMS) after the first payments were distributed, Illinois Healthcare and Family Services (HFS) also determined that the cash from the pilot could be exempted for: Aid for the Aging, Blind, and Disabled (AABD) Medical; Health Benefits for Workers with Disabilities(HBWD) and the Medicare Savings Program (MSP).

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[29] 7 CFR 273.9(c)(19)(iv)

[30] See Illinois Leading the Way - Contributions to the Field section for more on the work Somos Un Pueblo Unidos did in New Mexico that led to FNS issuing this policy guidance.

[31] See MR #22.17

Challenges with WIC and SSI

In addition to challenges protecting SNAP benefits, pilot administrators ran into hurdles trying to identify paths to protect the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) and Supplemental Security Income (SSI).

WIC[32]

The Food and Nutrition Service (FNS) and the Illinois Department of Human Services confirmed that cash received through the pilot could not be excluded for WIC purposes.[33] FNS replied that the Coronavirus State and Local Fiscal Recovery (SLFR) Funds, as authorized by Section 9901 of the American Rescue Plan Act (ARPA), are not specifically excluded in the underlying ARPA legislation from counting as income (despite this IRS interpretation), nor are they provided as a tax credit or refund. Therefore, the cash assistance provided by the City of Chicago would count as income for WIC eligibility determinations.

FNS further determined that the WIC regulations list allowable income exclusions. While this list includes disaster assistance provided under the Disaster Relief Act of 1974, as amended,[34] SLFR Funds are provided under the Social Security Act [Section 9901 (a) of ARPA], so by definition the cash assistance would not fall within the Disaster Act exclusion. As a result, the cash assistance provided by the pilot would not count as disaster assistance provided under the Disaster Act, and therefore be included for WIC income purposes.

[32] While the Chicago Resilient Communities pilot administrators were not able to identify a mechanism to protect WIC benefits at the time or gain approval from FNS or IDHS, IL does elect the adjunctive eligibility state option. Therefore, households eligible for TANF, Medicaid, or SNAP are not subject to income determination for WIC. Other states have had success protecting WIC benefits byway of adjunctive eligibility. See Illinois WIC state plan FY22.

[33] While this is all technically correct, pilots in other states have had some success protecting WIC through adjunctive eligibility. Income definitions and eligibility thresholds are set by the federal government except for households that are adjunctively (automatically) eligible under 7 CFR 246.7(d)(2)(vi). Under this provision, a state shall accept as income eligible any otherwise eligible individual who is fully certified as eligible for SNAP, Medicaid, or TANF. Under 7 CFR 246.7(d)(2)(v), adjunctively eligible households must document their eligibility for the program that makes them adjunctively eligible. It is theoretically possible for a household to be ineligible for (or voluntarily not participating in) programs that confer adjunctive eligibility and yet still income eligible for WIC, thus subjecting the household to federal income rules where guaranteed income payments are counted. However, many households will have guaranteed income payments excluded in WIC if they are excluded from programs that confer adjunctive eligibility – SNAP, TANF, Medicaid.

[34] 7 CFR 246.7(d)(2)(iv)(D)(13)

SSI

Administrators and members of the Chicago Resilient Communities Pilot Advisory Group[35] were particularly concerned about potential impact and loss of SSI benefits for pilot participants; however, there was no precedent for benefits protection for SSI. City administrators worked with the Mayor's Office for People with Disabilities and the regional SSA representative to develop a request for consideration by SSA General Counsel, pointing to a prior emergency message on pandemic-related assistance meeting the requirements for disaster assistance exclusions. At the time, the emergency message was limited to federal and state programs such as the federal Economic Impact Payment stimulus checks and pandemic-related rental assistance, but no local programs had been exempted.

Their diligent follow-up, coupled with advocacy from CRCP Advisory Group member, Karen Tamley, CEO of Access Living and former Commissioner of the Mayor's Office for People with Disabilities and SSI policy experts and advocates from Shriver Center on Poverty Law, Legal Council for Health Justice and others led to the first-ever exemption that other pilots could follow. Advocates pushed for written guidance in a letter to SSA, arguing that CRCP payments should qualify as "disaster relief" as defined by the SSA Act and its implementing regulations.[36]

It took many months for SSA administrators to secure written guidance approved by the general counsel. Just a month prior to the first distribution of monthly cash payments, SSA provided guidance through an Emergency Message, EM-20014 REV 8[37] that the pilot exemption was approved on the basis of being pandemic related disaster assistance excluded from income and resources. Pilot administrators requested a more universal waiver to apply to other publicly funded ARPA pilots, but SSA replied that individual pilots must pursue their own waivers. Since then, 13 additional local cash assistance programs, including one-time cash transfers and guaranteed income, programs have secured exemptions in updated versions of the emergency message.

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[35] The City of Chicago convened an Advisory Group composed of 37 community advocates, policy experts, alderpeople, and people who have experienced poverty. For a complete list of Advisory Group members see https://www.chicago.gov/city/en/sites/resilient-communities-pilot/home/partners.html

[36] See May 16, 2022 letter from advocates to SSA administrators.

[37] See SSA Emergency Message EM-20014 REV 9.

Additional benefits protection strategies pursued

Public Housing & Housing Choice Vouchers

The Chief Resident Services Officer of the Chicago Housing Authority (CHA),Mary Howard, served as a member of the Advisory Group. CHA administrators had been approached about utilizing their authority to exclude cash received through a guaranteed income pilot for the purposes of determining eligibility for public housing assistance prior to the Every Dollar Counts pilot launch. Although EDC did not pursue the exclusion in Chicago, CHA administrators were familiar with the mechanism by which pilot income could be excluded.

HUD confirmed that public housing authorities (PHAs) participating in HUD's Moving to Work Demonstration (MTW)have the authority to exclude income from GI pilots through their MTW plans. CHA need only amend their MTW plan to include an exclusion for guaranteed income pilots and have the plan be approved by HUD. The Chicago Housing Authority confirmed that cash from the pilot would not impact eligibility or rental calculations for public housing or housing vouchers (the funds received were considered to be temporary income given that the pilot is only 12 months). Advisories were sent to property managers and staff.

Illinois Leading the Way - Contributions to the Field

With three of the largest guaranteed income pilots in the country (Every Dollar Counts, Chicago Resilient Communities Pilot, and Cook County Promise), all of which have achieved significant success protecting benefits for pilot participants, Illinois has become a leader in the field.

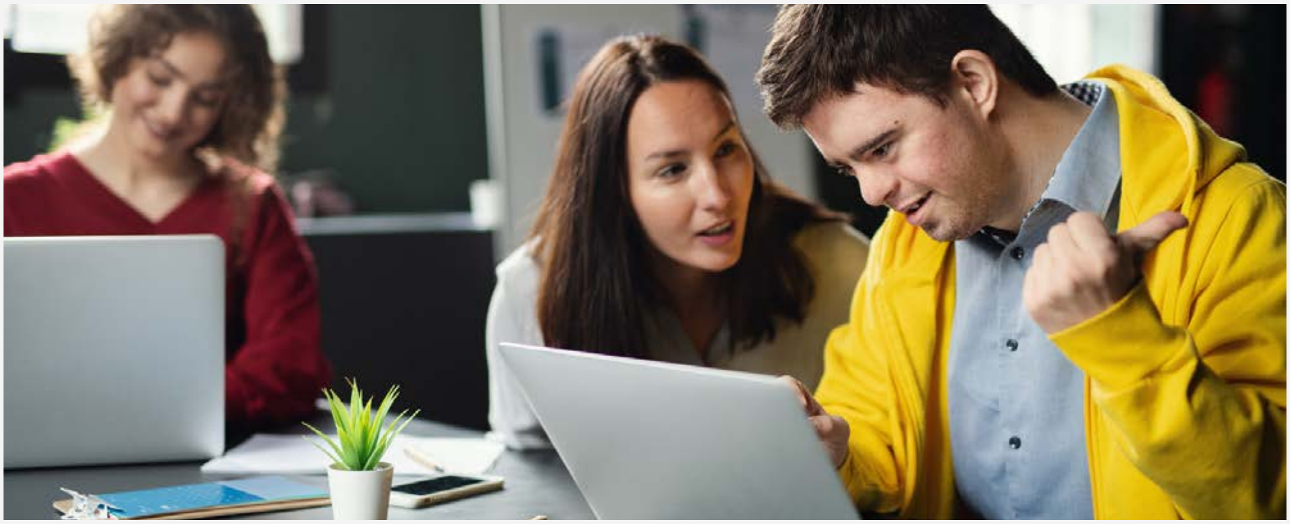
Every Dollar Counts and Chicago Resilient Communities Pilot administrators learned from each other and many other advocates throughout the country and remain committed to sharing the technical expertise they gained along the way and broader lessons learned with others navigating the complexity of mitigating and preventing benefits loss for pilot participants.

The benefits protection strategy undertaken by the City of Chicago was largely replicated by two other publicly funded guaranteed income pilots in Illinois, Cook County Promise and the City of Evanston Guaranteed Income Pilot Program, and set precedent for other pilots across the country.

With over 150 pilots completed or under way across the country, it is impossible to document all of the ways in which these early pilots informed or helped make possible the benefits protection strategies implemented by pilots in other states. A number of pilots were able to replicate the strategy to protect TANF, SNAP, and Medicaid after speaking directly with Illinois Department of Human Services leadership and seeing the policy guidance issued by the state agency. One such pilot was Arlington's Guarantee in Arlington County, VA. Arlington's Guarantee was launched in September 2021 in close partnership with the Arlington County Department of Human Services and local nonprofits.

As the movement for guaranteed income across the country grows, more and more pilots and advocates are navigating the complexity of public benefits and tax policy and pushing benefits administering agencies to maximize their authority to allow for benefits protection for individuals enrolled in guaranteed income pilots. In that vein, advocates continue to advocate to extend benefits protection and for further clarity when existing guidance has been inconsistent or unclear. One of the benefits of sharing and building on existing benefits protection work is that the gains achieved by individual pilots are collective and can benefit the broader community.

Every Dollar Counts administrators and Illinois advocates shared lessons learned from experience successfully protecting SNAP benefits in Illinois with pilot administrators and advocates across the country, including Somos Un Pueblo Unido in New Mexico. Somos is a statewide community-based and immigrant-led organization that promotes worker and racial justice. The organization co-led local and statewide campaigns to secure $35 million in cash assistance for over 55,000 families left out of federal COVID-19 cash relief programs. Their work supporting the launch of direct cash programs in New Mexico and advocacy with local and regional FNS offices to protect SNAP benefits led to more explicit guidance from FNS. The FNS guidance confirmed the policy mechanism by which the majority of pilots to date were using to protect SNAP and clarified that as long as cash payments received from a guaranteed income pilot are sourced solely from private funds or a mix of private and public funds and the state had also excluded those payments for the purposes of determining TANF eligibility, the payments could also be excluded for determining SNAP eligibility and benefit amounts.



A Look Ahead

There is plenty of work that remains to strengthen benefits protection for future guaranteed income pilots. The success of existing benefits protection strategies depends almost entirely on the support of benefits administering agencies and the local political landscape and context. The publicly funded pilots in Chicago (Chicago Resilient Communities Pilot and Cook County Promise) have had more success in benefits protection than almost any other pilot in the country. Yet, if and when those pilots transition to permanent programs, new benefits protection challenges will emerge.

As new funding sources are identified and Coronavirus State and Local Fiscal Recovery Funds (SLFRF) expire, the mechanism by which certain benefits were protected (such as SSI) will no longer be possible. In anticipation of the continuation of Cook County Promise and some of the emerging benefits protection challenges, the County is working to address some of the limitations of Public Act 101-0415 (SB1735) to maximize benefits protection for future participants. Public Act 101-0415 applies to pilots that were time-limited (no more than 60 months). It did not account for a permanent program design. Public Act 101-0415 also includes a research requirement.

To address the existing limitations, Cook County worked with then Senator Pacione-Zayas and Representative Anna Moeller to introduce and pass SB1665 (Public Act 103-0492). The bill, to the extent allowable by federal law, would ensure benefits protection for participants of Cook County Promise for the duration of the program, eliminate the research requirement and would exclude guaranteed income payments from being counted to determine eligibility for financial assistance for uninsured patients.

Policy like the bill the County pursued is a great next step to expand benefits protection, but there must be an eye towards and investment in broader, more comprehensive policy reform that strengthens public benefit programs to better serve people and families.

Guaranteed income pilot administrators and advocates could support opportunities in the short-term to strengthen public benefits programs in ways that increase access to programs while easing existing barriers to protect benefits for guaranteed income pilot program participants. One such example is eliminating asset limits entirely from SNAP and TANF eligibility determinations. Longer term, a focus on policy change that helps facilitate benefits protection for the next iteration of guaranteed income pilots while laying the groundwork to build toward a federal guaranteed income will be key.

Further Reading: Existing briefs, publications, and other benefits protections tools

Income Movement's Pilot Community Engagement Program Workshop Series & Tools:

- **Navigating Benefits** (one pager)
- **Protecting Benefits While Distributing Cash** (Workshop Recording)
- **Protecting Benefits for Pilot Participants** (one pager)
- **PCEP Protecting Benefits Working Session: Tools, Resources, Highlights**

Thriving Providers Project Benefits Protection Toolkit (Drew, Kimberly & McGinn, Jourdan. (2023). Thriving Providers Project, Impact Charitable, Home Grown, KD Strategic Advocacy & Consulting)

Maximizing the impact of direct cash transfers to young people: A policy toolkit. (Berger Gonzalez, S, Morton, M. Farrell, A. (2022). Chicago, IL: Chapin Hall at the University of Chicago)

Learning Memo from Guaranteed Income Community of Practice Federal Benefits Protection Working Group (March 2, 2022)

Guaranteed Income: States Lead the Way in ReImagining the Social Safety Net (Shriver Center on Poverty Law & Economic Security Project, April 2022) p. 19 State Considerations: Benefits Protection

The Benefits Cliff and Guaranteed Income (Guaranteed Income Community of Practice, June 2021)

Protecting Benefits in Guaranteed Income Pilots: Lessons Learned from the Abundant Birth Project (San Francisco Office of Financial Empowerment, Bay Area Regional Health Inequities Initiative, Expecting Justice, November 2021)

Mitigating loss of health insurance and means tested benefits in an unconditional cash transfer experiment: Implementation lessons from Stockton's guaranteed income pilot (Amy Castro, Stacia Martin, Sukhi Samra and Meagan Cusack, August 11, 2020)

Tools

Benefits Loss Calculator
Benefit Cliffs Calculator (National Center for Children in Poverty)
Benefits Cliff Coaching Program (Leap Fund)
Policy Engine
Disability Benefits 101

Appendix

- IDHS Secretary Grace Hou **letter**
- **Lobbying Materials (SB1735)**
    - **Fact sheet & FAQ**
    - **Committee Testimony**
    - **Floor Guide**
    - **Legal & Budgetary Overview**

Glossary

Aid to the Aged, Blind, and Disabled (AABD Cash): AABD Cash is a cash benefit available to people who are age 65 or older, or who are under age 65 and are blind or disabled as defined by the Social Security Administration.

Aid to the Aged, Blind, and Disabled (AABD Medical): AABD Medical is Medicaid coverage for people 65 or older, or people who are blind or have a permanent disability with income up to 100% of the federal poverty level.

American Rescue Plan Act (ARPA): The American Rescue Plan Act is a $1.9 trillion economic stimulus bill passed by the 117th United States Congress and signed into law by President Joe Biden on March 11, 2021, to speed up the country's recovery from the COVID-19 pandemic and the subsequent economic downturn.

Benefits (or public benefits): Includes a wide variety of government programs that provide financial and other assistance to individuals and families. Commonly used benefit programs include Supplemental Nutrition Assistance Program (SNAP), Medicaid, Social Security Income (SSI), and housing assistance (such as Section 8 Housing Vouchers).

Benefits cliff: A situation that occurs when increases in income trigger a loss of public assistance that can leave families worse off financially. Benefits cliffs exist in the majority of public assistance programs and continue to be a deterrent to wage growth and wealth creation for many families across the United States.

Child Care Assistance Program (CCAP): The Child Care Assistance Program is a federal program providing low-income, working families with access to affordable child care.

CSBG-Funded Programs: The Community Services Block Grant (CSBG) is a federally funded block grant in the Office of Community Services, Administration for Children and Families, United States Department of Health and Human Services that provides funds to states, territories, and tribes to administer to support services that alleviate the causes and conditions of poverty in under resourced communities. Tribes, territories, and over 1,000 local Community Action Agencies provide CSBG funded services and activities including housing, nutrition, utility, and transportation assistance; employment, education, and other income and asset building services; crisis and emergency services; and community asset building initiatives.

Guaranteed Income (GI): A type of cash transfer program that provides unconditional cash to members of a community with no strings attached and no work or other requirements.

Housing Choice Voucher (HCV) (Formerly Section 8): The Housing Choice Voucher Program is a federally funded program provided by the U.S. Department of Housing and Urban Development (HUD). The program helps participant families pay for housing in the private market, such as apartments, duplexes, condominiums, townhouses and single-family homes. Participant families contribute 30-40% of their income toward rent and utilities and the local PHA pays the remainder directly to the property owner.

Illinois Home Weatherization Assistance Program (IHWAP): The Illinois Home Weatherization Assistance Program helps low income residents and households conserve fuel and reduce energy costs by making their homes and apartments more energy efficient.

Low Income Home Energy Assistance Program (LIHEAP): LIHEAP provides federally funded assistance to reduce the costs associated with home energy bills, energy crises, weatherization, and minor energy-related home repairs.

Low Income Household Water Assistance Program (LIHWAP): LIHWAP provides funds to assist low-income households with water and wastewater bills.

Medicaid: Medicaid provides health coverage to millions of Americans, including eligible low-income adults, children, pregnant women, elderly adults and people with disabilities. Medicaid is administered by states, according to federal requirements. The program is funded jointly by states and the federal government.

Modified Adjusted Gross Income (MAGI): The figure used to determine eligibility for premium tax credits and other savings for Marketplace health insurance plans and for Medicaid and the Children's Health Insurance Program (CHIP). MAGI is adjusted gross income (AGI) plus these, if any: untaxed foreign income, non-taxable Social Security benefits, and tax-exempt interest.

Moving to Work: Moving to Work (MTW) is a demonstration program for public housing authorities (PHAs) that provide the opportunity to design and test innovative, locally designed strategies that use federal dollars more efficiently, help residents find employment, and increase housing choices for low-income families. MTW allows PHAs exemptions from many existing public housing and voucher rules and provides funding flexibility with how they use federal funds.

Public Housing Authority or Public Housing Agency (PHA): PHA's manage housing for low-income residents at rents they can afford. The U.S. Department of Housing and Urban Development (HUD) oversees the public housing program but it is administered locally by public housing agencies or public housing authorities.

Temporary Aid to Needy Families (TANF): TANF is a block grant that provides cash assistance to families with children living in extreme poverty. TANF also provides funding for a wide range of services (e.g., work-related activities, child care, and refundable tax credits) designed to accomplish the program's four broad purposes.

Social Security Administration (SSA): SSA is the federal agency that administers retirement, disability, survivor, and family benefits, and enrolls individuals in Medicare. SSA also provides Social Security Numbers, which are unique identifiers needed to work, handle financial transactions, and determine eligibility for certain government services.

Social Security Income (SSI): The Supplemental Security Income program provides monthly payments to adults and children with a disability or blindness who have income and resources below specific financial limits. SSI payments are also made to people age 65 and older without disabilities who meet the financial qualifications.

Special Supplemental Nutrition Program for Women, Infants, and Children (WIC): WIC provides federal grants to states for supplemental foods, health care referrals, and nutrition education for low-income pregnant, breastfeeding, and non-breastfeeding postpartum women.

Supplemental Nutrition Assistance Program (SNAP): SNAP is the largest federal nutrition assistance program. SNAP provides benefits to people and families with low-incomes via an Electronic Benefits Transfer (EBT) card. The EBT card can be used like a debit card to purchase eligible food in authorized retail food stores. The program is managed by the Food and Nutrition Service (FNS) of the United States Department of Agriculture (USDA).

OVERVIEW OF BENEFITS IMPACT		
Benefit	**Every Dollar Counts**	**Chicago Resilient Communities Pilot**
Affordable Care Act (ACA) Adult on Medicaid, or Medicaid Expansion	No Impact	No Impact
Aid for the Aging, Blind, and Disabled (AABD) Cash	No Impact	No Impact
Aid for the Aging Blind, and Disabled (AABD) Medical	Impacted but N/A	No Impact
All Kids	No Impact	No Impact
Chicago Housing Authority Public Housing or Housing Choice Voucher (CHA)	Impacted but N/A	No Impact
Child Care Assistance Program (CCAP)	No Impact	No Impact
Health Benefits for Workers with Disabilities (HBWD)	Impacted but N/A	No Impact
Illinois Home Weatherization Assistance Program (IHWAP)	No Impact	No Impact
Low Income Home Energy Assistance Program (LIHEAP)	No Impact	No Impact
Low Income Home Water Assistance Program (LIHWAP)	No Impact	No Impact
Moms and Babies	No Impact	No Impact
Supplemental Nutrition Assistance Program (SNAP)	No Impact	No Impact
Supplemental Security Income	Impacted but N/A	No Impact
Temporary Assistance for Needy Families (TANF)	No Impact	No Impact
The Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)	Impacted	Impacted

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Nothing in this brief is intended as legal or tax advice.

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