



**USDA - FNS proposed  
changes seek to increase  
access and improve parity**

---

**Worksheets**



# FNS Proposed Changes to Increase Access and Improve Parity Worksheets

**Question to ITOs:** USDA wants to support more people in need accessing FDPIR. Should USDA use a gross income eligibility requirement?

*Depending on costs of shelter, utilities and other deductions in an ITO's service area, this change might or might not increase overall access to the program*

The U.S. Department of Agriculture Food and Nutrition Services (USDA FNS) is proposing changes to the Food Distribution Program on Indian Reservations (FDPIR) regulations. USDA's goal for these changes is to help more people who need FDPIR access it easily, and to create parity between FDPIR and other nutrition programs. To learn more about all proposed changes, [please see this chart developed by the Indigenous Food & Agriculture Initiative](#).

One of the FNS proposals is to change income eligibility guidelines. Currently, FDPIR base income eligibility thresholds are set using 100% of the U.S. Federal Poverty Guidelines and increased by the Supplemental Nutrition Assistance Program (SNAP) standard deduction by household size. Further deductions may be applied. FNS is requesting input on whether the agency should use a gross income eligibility requirement without deductions. The calculations below are based on a gross income set at 185% of the [U.S. Federal Poverty Guidelines](#). FNS offered 185% of the U.S. Federal Poverty rate as an example in the proposed rule but is open to further discussion as to the appropriate percentage change.

Transitioning to a gross income eligibility requirement without deductions could impact ITOs differently depending on their location and their internal administrative resources.

IFAI developed the worksheets below to help ITOs determine how USDA's proposed change to income eligibility could impact their participants. It is designed to help calculate whether or not transitioning to a Gross Income Eligibility Requirement would be beneficial for their participants by presenting a side-by-side comparison of the current standards and proposed changes. ITOs can then use the results of this worksheet to inform their comments on the rule.

IFAI has developed a draft comment letter ITOs may use as a starting point for their own input. [It can be found here](#).

The following pages are for illustration purposes, and this template allows users to input their own numbers at [bit.ly/WorksheetFNS](https://bit.ly/WorksheetFNS).

**Worksheet #1: The following exemplar worksheet is based on the following assumptions:**

- A family of four living in Maine
- Gross Household Income is \$37,200 annual (\$3,100 per month) comprised solely of wages (earned income)
- Housing cost is \$800 per month
- No other deductions

**ELIGIBILITY CALCULATIONS**

**UNDER CURRENT RULES**

**UNDER POTENTIAL GROSS INCOME ELIGIBILITY OF 185% FEDERAL POVERTY GUIDELINE WITHOUT DEDUCTIONS**

<b>Gross Household Income per Month</b>	\$3,100	<b>Household Income per Month</b>	\$3,100
---	---------	-----------------------------------	---------

<b>Subtract (per month):</b>		<b>Subtract:</b>	<b>Deductions not considered with this formula</b>
		\$0	

• 20% of Earned Income	(\$620)		
• Actual dependent care expenses paid to a non-family member	\$0		
• Actual child support costs paid to or for a non-household member	\$0		
• Out-of-pocket medical expenses paid by any household member who is elderly or disabled in excess of \$35 per month.	\$0		
• Home care meal-related deduction for Households who furnish the majority of meals for a home care attendant equal to the maximum SNAP benefit for a one-person household.	\$0		

## ELIGIBILITY CALCULATIONS CONTINUED

### UNDER CURRENT RULES

### UNDER POTENTIAL GROSS INCOME ELIGIBILITY OF 185% FEDERAL POVERTY GUIDELINE WITHOUT DEDUCTIONS

- Standard Shelter/Utility Expense Deduction if household has at least one monthly shelter or utility expense. The deduction is determined by location and currently ranges from \$400-\$550/month.\* \$500

**Total Deductions** \$1,120

\$0

**Net (Gross Household Income minus Deductions)**  
**This is the amount that eligibility will be based on.** \$1,980

**Net (Gross Household Income minus Deductions)**  
**This is the amount that eligibility will be based on.** \$3,100

- To be eligible, the net income above must be at or below \$2,506/month based on current eligibility standards which can be found at [fns.usda.gov/fdpir/net-monthly-income-standards](https://fns.usda.gov/fdpir/net-monthly-income-standards)

This household qualifies for FDPIR under current standards, but ITO must analyze income and deductions to determine eligibility.

\*If family size is other than 4 members, see link for correct eligibility standard.

- To be eligible, the net income above must be at or below \$4,625/month based on a potential Gross Income Eligibility Standard at 185% of Federal Poverty Guideline without deductions. Federal Poverty Guidelines can be found at <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines/prior-hhs-poverty-guidelines-federal-register-references>

This household would qualify for FDPIR under Gross Income Eligibility Standard and the ITO does not need to analyze deductions to determine eligibility.

\*If family size is other than 4 members, see link for correct eligibility standard.

# FNS Proposed Changes to Increase Access and Improve Parity

- **Housing & Shelter Proposed Update:** Separate from the feedback about whether FNS should allow an eligibility standard that is based on gross income without deductions, there is proposed language to increase the standard shelter/utility expense deduction and/or to allow actual expenses. Current allowable deduction can be found at [fns.usda.gov/fdpir/net-monthly-income-standards](https://fns.usda.gov/fdpir/net-monthly-income-standards) on the last page.
- **Additional Considerations:** Since FNS is requesting feedback on the eligibility requirement, Tribes have an opportunity to propose FNS consider other options that may be beneficial. For example, if FNS increases the eligibility guideline to include a greater percentage of the Federal Poverty Guideline (such as increasing to 185%) while also maintaining the current allowable deductions, program access would be expanded while at the same time administrative processing would be simplified in most cases. This is because significantly more applicants would be eligible based on the gross income standard alone, and only those applicants with income close to the guideline limit would need further analysis to factor in deductions.

## References:

- **Current FDPIR Eligibility Guidelines:** [fns.usda.gov/fdpir/net-monthly-income-standards](https://fns.usda.gov/fdpir/net-monthly-income-standards)
- **Current FDPIR Allowable Housing Deductions based on location:** <http://fns.usda.gov/fdpir/net-monthly-income-standards>
- **Current Federal Poverty Guidelines:** <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines/prior-hhs-poverty-guidelines-federal-register-references>

