



**State of Florida
Department of Children and Families**

Rick Scott
Governor

Mike Carroll
Secretary

January 30, 2017

Sasha Gersten-Paal
Branch Chief, Certification Policy Branch, Program Development Division
Supplemental Nutrition Assistance Program
Food and Nutrition Service
United States Department of Agriculture
3101 Park Center Drive, Room 812
Alexandria, Virginia 22302

Dear Ms. Gersten-Paal:

Thank you for the opportunity to comment on the December 1, 2016, Federal Register Volume 81 Number 231 in which the Food and Nutrition Service requested comments on implementation of four sections of the Agricultural Act of 2014, (2014 Farm Bill), affecting eligibility, benefits, and program administration requirements for the Supplemental Nutrition Assistance Program (SNAP).

Florida reviewed Section 4007, clarifies the components of the SNAP Employment & Training (E&T) program with a focus on customers receiving skills needed for the current job market. The student exemption for E&T for institution of higher learning would be limited to those who are enrolled in a course or program of study that is part of a program of a career or technical education. The requirements of this section would have minimal impact for Florida.

Florida reviewed Section 4008, adds new criminal violations that will determine eligibility for receiving SNAP benefits. The section prohibits anyone convicted of Federal aggravated sexual abuse, murder, sexual exploitation and abuse of children, sexual assault, or similar State laws, and who do not comply with the terms of their sentence or parole or are a fleeing felon, from receiving SNAP benefits. The requirements of this section of the proposed rule only require an attestation by the applicant at application and recertification as to whether any member of the household meets any of these criteria. The work hours for staff to verify the disqualified felon status is a potential burden to the agency, when the customer's statement should be acceptable. There would be a financial impact with added language requirements to our paper and online applications. There will also be programming cost to program the system to exclude this group from Broad Based Categorical Eligibility.

Florida reviewed Section 4009, prohibits households containing a member with substantial lottery and gambling winnings from receiving SNAP benefits until the household meets the

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allowable financial resources and income eligibility requirements of the program. Florida would be required to have an agreement with the State Lottery and Tribal organizations. Accessing and obtaining data for all gaming entities in Florida could be problematic and require additional legislation.

Florida reviewed Section 4015, requires all State agencies to have a system in place to verify income, eligibility, and immigration status. Florida currently has implemented this operating procedure with Income and Eligibility Verification System (IVES) and Systematic Alien Verification for Entitlements (SAVE). These systems are not defined as an unfunded federal mandate. However, the state is responsible for paying for these systems causing a direct cost to the state.

Thank you for the opportunity to comment. If you have any questions or need additional information, please contact Susan Thomas, Chief of Program Policy, at (850) 717-4106.

Sincerely,



Tonyaleah Veltkamp
Director
Office of Economic Self-Sufficiency