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Phyllis Gilmore, Secretary

Sam Brownback, Governor

March 31, 2017

Sasha Gersten-Paal, Branch Chief
Certification Policy Branch
Program Development Division
Food and Nutrition Service
3101 Park Center Drive
Alexandria, Virginia 22302

Dear Ms. Gersten-Paal:

In regards to the Federal Register /Vol. 81, No. 231 /Thursday, December 1, 2016 / Proposed Rules 86617 (Disqualification for Substantial Lottery or Gambling Winnings Section 4009) which requires that households that have received substantial lottery or gambling winnings shall immediately lose eligibility for SNAP benefits, and gives the Secretary authority to define what amount constitutes substantial winnings. We disagree with the definition of substantial winnings proposed as defined as a cash prize won in a single game equal to or greater than \$25,000 before taxes or other amounts are withheld. The current resource limit that every SNAP household or SNAP applicant is held to is set at \$2,250 or \$3,250 in countable resources if at least one person is age 60 or older, or is disabled. Reasoning stated by FNS to set the substantial winnings at \$25,000 includes "significant lifestyle change is an amount that would push a household's income above the SNAP gross income limits for a household of three considered annually for a given fiscal year." This reasoning disregards the resource limit mandated by federal law and causes inequality with other SNAP households in enforcing that resource limit.

We believe a more reasonable amount for substantial winnings would be \$5,000. This amount is much closer to the resource limit. Lottery or gambling amounts won over \$5,000 are widely considered by taxpayers significant enough for a household to be self-sufficient. We believe SNAP benefits should be preserved for those who are truly in need.

We also suggest that there needs to be a static threshold on the winnings amount to reduce the administrative burden of recalculating this threshold each year.

Sincerely,

Chris Tomlinson,
Food Assistance Program Manager

Strong Families Make A Strong Kansas