



Whole Family Systems (WFS)



How Guaranteed Income Payments Affect Public Benefits

This information is provided for community organizations and others that are considering providing Guaranteed Income to families in Minnesota. This is a basic and high-level overview of how the income could affect benefits families may already be receiving or may want to apply for. [Policy Bulletin 23-04-01 Unearned Income Policy for Public Assistance Programs](#) has guidance for DHS public assistance programs. Please refer your questions to Jeanne McGovern-Acuna Whole Family Systems Manager at jeanne.mcgovern-acuna@state.mn.us.

For other programs listed below, the policy information listed is correct as of 11-30-22, and for questions about these programs, please refer to the contact names in the chart and when sending questions to non-DHS program contacts, please cc Jeanne McGovern-Acuna Whole Family Systems manager at jeanne.mcgovern-acuna@state.mn.us.

Program	State Agency	Contact Person	What are the federal policies for this program?	What action is necessary in order to disregard this source of income?
Minnesota Family Investment Program (MFIP) Cash and food assistance for families with children in poverty.	MN Department of Human Services	Jeanne McGovern-Acuna Whole Family Systems Manager jeanne.mcgovern-acuna@state.mn.us	States have broad discretion in defining income for TANF eligibility. Temporary Assistance to Needy Families (TANF) is the name of the federal block grant states receive to fund cash assistance and other services to very low income families.	None. Based on the list of unearned income sources at 256P.06, subd. 3(2) , recurring payments from guaranteed income programs are not counted when determining eligibility or benefits for public assistance programs under chapter 256P (MFIP, DWP, RCA, CCAP, GA, MSA, and Housing Support).
Diversionsary Work Program (DWP) When families with children first apply for cash assistance, they	MN Department of Human Services	Jeanne McGovern-Acuna Whole Family Systems Manager jeanne.mcgovern-acuna@state.mn.us	States have broad discretion in defining income for TANF eligibility. Temporary Assistance to Needy Families (TANF) is the name of the federal block grant states receive to fund cash assistance and	None. Based on the list of unearned income sources at 256P.06, subd. 3(2) , recurring payments from guaranteed income programs are not counted when determining eligibility or benefits for public assistance

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usually start in DWP. It's a four consecutive month program that provides cash assistance and helps parents find jobs.			other services to very low income families.	programs under chapter 256P (MFIP, DWP, RCA, CCAP, GA, MSA, and Housing Support).
Refugee Cash Assistance (RCA) Assistance for people without children with an eligible immigration status.	MN Department of Human Services	Jeanne McGovern-Acuna Whole Family Systems Manager Jeanne.mcgovern-acuna@state.mn.us	Federal regulations allow RCA to follow guidance for the state's TANF program (MFIP).	None. Based on the list of unearned income sources at 256P.06, subd. 3(2) , recurring payments from guaranteed income programs are not counted when determining eligibility or benefits for public assistance programs under chapter 256P (MFIP, DWP, RCA, CCAP, GA, MSA, and Housing Support).
Child Care Assistance Program (CCAP) Funds to help low income families pay for child care.	MN Department of Human Services	Jeanne McGovern-Acuna Whole Family Systems Manager Jeanne.mcgovern-acuna@state.mn.us	Federal rules offer the state significant flexibility.	None. Based on the list of unearned income sources at 256P.06, subd. 3(2) , recurring payments from guaranteed income programs are not counted when determining eligibility or benefits for public assistance programs under chapter 256P (MFIP, DWP, RCA, CCAP, GA, MSA, and Housing Support). Child care authorization policies are not impacted by DHS' guidance about recurring payments from guaranteed income pilots or programs.
General Assistance (GA) Cash assistance for adults without children who have a serious illness, disability, or other issue that limits their ability to work.	MN Department of Human Services	Jeanne McGovern-Acuna Whole Family Systems Manager Jeanne.mcgovern-acuna@state.mn.us	General Assistance is a state program but people who receive GA also may qualify for federal disability benefits.	None. Based on the list of unearned income sources at 256P.06, subd. 3(2) , recurring payments from guaranteed income programs are not counted when determining eligibility or benefits for public assistance programs under chapter 256P (MFIP, DWP, RCA, CCAP, GA, MSA, and Housing Support).
Minnesota Supplemental Aid (MSA)	MN Department of Human Services	Jeanne McGovern-Acuna Whole Family Systems Manager	Minnesota Supplemental Aid is a state program but people who receive MSA also may qualify for federal disability benefits.	None. Based on the list of unearned income sources at 256P.06, subd. 3(2) , recurring payments from guaranteed income programs are not counted when determining eligibility or benefits for public assistance

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<p>An income supplement for people who receive federal Supplemental Security Income (SSI). Some people who are blind, have a disability, or are older than 65 but do not get SSI because their other income is too high may also be eligible for MSA if they meet the income limit.</p>		<p>Jeanne.mcgovern-acuna@state.mn.us</p>		<p>programs under chapter 256P (MFIP, DWP, RCA, CCAP, GA, MSA, and Housing Support).</p>
<p>Housing Support (formerly known as Group Residential Housing) The Housing Support program is an income supplement program providing room and board and sometimes supplemental services for people with disabilities and older adults with low incomes.</p>	<p>MN Department of Human Services</p>	<p>Jeanne McGovern-Acuna Whole Family Systems Manager Jeanne.mcgovern-acuna@state.mn.us</p>	<p>Housing Support is a state program but people must meet a combination of eligibility requirements set by the Supplemental Security Income program or General Assistance program to qualify for assistance.</p>	<p>None. Based on the list of unearned income sources at 256P.06, subd. 3(2), recurring payments from guaranteed income programs are not counted when determining eligibility or benefits for public assistance programs under chapter 256P (MFIP, DWP, CCAP, GA, MSA, and Housing Support).</p>
<p>Supplemental Nutrition Assistance Program (SNAP) <i>This used to be called Food Stamps.</i></p>	<p>MN Department of Human Services</p>	<p>Jeanne McGovern-Acuna Whole Family Systems Manager Jeanne.mcgovern-acuna@state.mn.us</p>	<p>SNAP is a federal program governed by federal law and regulations. States have the authority to exclude income sources from SNAP that the state's Temporary Assistance for Needy Families (TANF) program excludes, with some</p>	<p>None. Recurring payments from guaranteed income programs are not counted when determining eligibility or benefits for SNAP if the payments are sourced solely from private funds or a mix of private and public funds. Payments funded with funds from a variety of public sources (e.g. State, local, and federal</p>

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			<p>exceptions. Minnesota’s TANF program is the Minnesota Family Investment Program (MFIP). However, “regular payments from a government source” cannot be excluded for SNAP even if they are excluded for the state’s TANF program. Payments or allowances a household receives from an intermediary that are funded from a government source are considered payments from a government source.</p>	<p>dollars) are considered payments from a government source and cannot be excluded for SNAP even if the payments are excluded under TANF.</p>
<p>Medical Assistance and MinnesotaCare</p>	<p>MN Department of Human Services</p>	<p>Jeanne McGovern-Acuna Whole Family Systems Manager Jeanne.mcgovern-acuna@state.mn.us</p>	<p>Eligibility for Medical Assistance under a Families with Children and Adults (MA-FCA) basis and MinnesotaCare is determined according to whether the income is taxable. If the income is taxable, it is counted when determining eligibility for MA-FCA and MinnesotaCare.</p> <p>Eligibility for Medical Assistance under an Age 65 or Older and People Who Are Blind or Have a Disability (MA-ABD) basis is determined according to the methodology of the Social Security Income (SSI) program to determine countable income, except where specified in Minnesota Statutes.</p>	<p>DHS-Health Care Eligibility and Access Division is currently in discussions with Federal Relations to determine if payments from guaranteed income programs are considered non-taxable due to being general welfare payments or disaster relief payments. If the income is considered taxable, it must be counted when determining eligibility. If it is not taxable income, then the income from the guaranteed income pilots would not be counted.</p> <p>The statute specifying that MA-ABD follows SSI methodology is 256B.056, subd. 1a. State legislation would be required to exclude payments from guaranteed income programs for Medical Assistance for Persons over 65, Who are Blind, or Disabled (MA-ABD). DHS would also have to submit an amendment to its state Medicaid plan to obtain federal approval.</p>
<p>Energy Assistance</p>	<p>MN Department of Commerce</p>	<p>Michael Schmitz, Director Office of Energy Assistance Programs michael.schmitz@state.mn.us</p>	<p>The Department of Commerce utilizes federal funds from the Low Income Home Energy Assistance Program (LIHEAP). Because LIHEAP is a block grant, States have broad discretion in defining income and disregards.</p>	<p>The Department of Commerce can exclude income from guaranteed income pilots from eligibility determination through their annual plan process with the federal government.</p>

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<p>WIC (Special Supplemental Nutrition Program for Women, Infants and Children) Cash payments cannot be disregarded but families are categorically eligible if they receive SNAP, TANF, Medicaid, or SCHIP.</p>	<p>MN Department of Health</p>	<p>Kate Franken Director, Minnesota WIC Program Minnesota Department of Health Kate.Franken@state.mn.us Please cc: Jeanne McGovern-Acuna Whole Family Systems Manager Jeanne.mcgovern-acuna@state.mn.us</p>	<p>Cash payments cannot be disregarded. But families are categorically eligible for WIC if they receive assistance from SNAP, MFIP, or Medical Assistance or Minnesota Care. The US Department of Agriculture has denied waivers on this in the past.</p>	<p>The question is an arithmetic question: Will the extra income make a family ineligible for Medical Assistance?</p>
<p>National School Lunch Program</p>	<p>MN Department of Education</p>	<p>Monica Herrera Director, Nutrition Services Minnesota Department of Education monica.herrera@state.mn.us Please cc: Jeanne McGovern-Acuna Whole Family Systems Manager Jeanne.mcgovern-acuna@state.mn.us</p>	<p>Cash payments cannot be disregarded but families are categorically eligible if receiving SNAP or TANF. The US Department of Agriculture has denied waivers on this in the past.</p>	<p>This is primarily federal funding. Applications are all approved by school districts. SNAP TANF, some Medicaid categories and American Indian Food Distribution programs on reservations are categorically eligible. If a school district or site participates in the Community Eligibility Provision (CEP) program, all the children in the designated school are automatically eligible for breakfast and lunch at no costs to the family. The following groups have categorical eligibility for free and reduced lunches, meaning if they are in one of the following groups they are automatically eligible for free and reduced lunches.</p> <ul style="list-style-type: none"> • A child in Head Start

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				<ul style="list-style-type: none"> • Foster children • SNAP participants • Some Medicaid participants (those that meet income eligibility, only 2 of the 5 Medicaid categories line up with NSLP income guidelines) • A family in an emergency shelter
Child and Adult Care Food Program	MN Department of Education	For inquiries: FCCH MDE mailbox FDCH.mde@state.mn.us The mailbox listed above is for contacting the Nutrition Program Consultants at MDE who specialize in family child care for CACFP. Please cc: Jeanne McGovern-Acuna Whole Family Systems Manager Jeanne.mcgovern-acuna@state.mn.us	All Income must be counted when families complete the Household Income Statement (HIS) for CACFP. The impact of the additional income, won't affect an individual family whose children attend a care program operating CACFP; unless the family operates a licensed family child care business. The U.S. Department of Agriculture has denied waivers on this in the past, so Minnesota will not be requesting a waiver for this funding to be omitted from the household income for CACFP.	CACFP Reimbursement is provided to organizations such as licensed child care and licensed adult daycare centers that are approved to participate in CACFP. The funds must be used to aid the costs of providing nutritious meals and snacks that meet the CACFP meal pattern and nutrition requirements. Since meals are provided to all participants enrolled, individual families are not impacted by reporting the additional household income when completing the household income statement (HIS) for CACFP. When a provider operates a licensed family child care the reimbursement amount is based on a Tiering status of each licensed family child care home. Tier 1 status ensures the higher rate of reimbursement for CACFP meals and snacks. Tier 2 providers still receive CACFP reimbursement, but at a lower rate per meal and/or snack. Tier 1 eligibility is determined based on area and census data to establish a low-income eligibility. In addition, If a provider's home is not area eligible by school area or census area data the licensed provider can submit a HIS to their sponsoring organization to determine individual provider eligibility. If the provider is approved for Tier 1 reimbursement rates based on the HIS they will receive the higher rate of

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				<p>reimbursement for meals and snacks served while operating CACFP.</p> <p>If the provider's home is not Tier 1 the provider will be given a status of Tier 2, but can still collect HIS from enrolled families and receive the higher reimbursement rate just for those families' meals and snacks who's income meets the guidelines for free or reduced-price meals.</p>
Head Start	MN Department of Education	<p>Jeanne Dickhausen Head Start Collaboration Specialist MN Department of Education Jeanne.Dickhausen@state.mn.us</p> <p>Please cc: Jeanne McGovern-Acuna Whole Family Systems Manager Jeanne.mcgovern-acuna@state.mn.us</p>	<p>Cash <i>gifts</i> of less than \$14,000 do not count as taxable income, and are not reported to the IRS or states as income. Head Start grantees are allowed to hold 10 percent of their enrollment slots for over-income families. This is a local level decision that can be discussed with the Head Start programs who may participate.</p> <p>Local programs establish selection criteria that weighs prioritization of eligibility factors, including those listed below.</p> <p>An expectant family or child is eligible if: The family's income is equal to or below the poverty line ; or,</p>	<p>Minnesota supplements federal funding with state funding for Early Head Start/Head Start federal grantees. State law ¹¹ allows local programs to submit a plan to use state funds for an innovative initiative. If approved, funding for an Innovative Initiative may be used to operate differently than what is required by federal Head Start Program Performance Standards. A requested and approved exemption does not apply to the entire Early Head Start/Head Start program. An exemption applies only to the portion of the program with the approved Innovative Initiative. Program plans are submitted and approved annually. An Early Head Start/Head Start program may request a program plan revision at any time throughout the state fiscal year.</p> <p>In certain circumstances, Head Start/Early Head Start programs may enroll up to 35% of participants whose families do not meet eligibility criteria and whose incomes are below 130 percent of the federal poverty</p>

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			<p>Documentation from a public or private state, local or tribal agency is accepted to determine eligibility for the following:</p> <ul style="list-style-type: none"> In the absence of child care, would be potentially eligible for public assistance; including TANF child-only payments; SSI and SNAP (now includes participation in SNAP) <p>or</p> <ul style="list-style-type: none"> The child is experiencing homeless; or, The child is in foster care 	<p>line. There are additional allowances for Tribal Head Start/Early Head Start programs Head Start, income verification is valid for 2 years. In certain instances, a child may be age-eligible for a 3rd year of Head Start. Income verification would be done again prior enrollment in a 3rd year of Head Start.</p>
<p>Early Learning Scholarships Up to \$8,500 in scholarships for children 3-5 or younger children who are the children of teen parents, are currently in foster care, receiving child protection services or have been homeless in the last two years. Children in priority status may be eligible for higher scholarship awards</p>	<p>MN Department of Education</p>	<p>Sandra Myers Early Learning Services Supervisor MN Department of Education Sandra.myers@state.mn.us</p> <p>Please cc: Jeanne McGovern-Acuna Whole Family Systems Manager Jeanne.mcgovern-acuna@state.mn.us</p>	<p>None. This is a state of Minnesota program.</p>	<p>Eligibility is for families at or below 185% of poverty. If the family receives assistance from one of 8 programs, the child is categorically eligible for scholarships. This means the family does not have to submit detailed income information to determine the child's eligibility. The 8 programs are: free and reduced school lunches, Child or adult care food program, Food Distribution program on Indian reservations, Head Start, Minnesota Family Investment Program, Child Care Assistance Program, Supplemental Nutrition Assistance Program, or in foster care.³</p>
<p>Family Home visiting</p>	<p>MN Department of Health</p>	<p>Dawn Reckinger Manager, Family Home Visiting Dawn.reckinger@state.mn.us</p>	<p>TANF: Families have to be below 200% of the poverty line to qualify for home visiting services.</p>	<p>TANF: Families have to be below 200% of the poverty line to qualify for home visiting services supported by TANF funding. MIECHV: Does not have income requirements</p>

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		<p>Please cc: Jeanne McGovern-Acuna Whole Family Systems Manager Jeanne.mcgovern-acuna@state.mn.us</p>	<p>Maternal, Infant, Early Childhood Family Visiting : Federal funding that funds evidence based home visiting programs set eligibility criteria that are in addition to income: pregnancy status, risk factors, etc.</p>	<p>Regardless of source, the question is an arithmetic question: will the extra income make a family ineligible for Medical Assistance or other benefits. All counties have state funding for home visiting which has no restrictions on income.</p>
Transitional Housing	MN Department of Human Services	<p>Jeanne McGovern-Acuna Whole Family Systems Manager Jeanne.mcgovern-acuna@state.mn.us</p>		<p>For the state funded Transitional Housing Program families have to be homeless when they enter the program. The law is silent on income.</p>
Emergency Assistance	MN Department of Human Services	<p>Please cc: Jeanne McGovern-Acuna Whole Family Systems Manager Jeanne.mcgovern-acuna@state.mn.us</p>	<p>Families must be below 200% of poverty.</p>	<p>Counties determine local emergency assistance policies. They can choose to disregard or not disregard different income sources.</p>
Supplement Security Income A federal income support program for people in poverty with disabilities.	N.A.		<p>U.S. Social Security Administration: Cash payments count when determining someone's eligibility</p>	<p>There is no role for state government in this program.</p>
Section 8 and Public Housing	Local Public Housing Authorities	<p>HCV Programs (Section 8) Dominic.Mitchell@stpha.org Multi-Family or Public Housing Programs Lisa.Feidler@stpha.org Please cc: Jeanne McGovern-Acuna Whole Family Systems Manager Jeanne.mcgovern-acuna@state.mn.us</p>	<p>The U.S. Department of Housing and Urban Development administers section 8 and public housing. Someone who receives section 8 housing must pay 30% of their income for rent.</p>	<p>A local public housing authority can request a waiver from HUD to disregard the income. The board of the local public housing authority has to approve the request for that waiver.</p>

