

IDAHO'S SSI POLICY:

Penalizing the Poor and Disabled

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I. OVERVIEW

More than 260,000 people with disabilities live in Idaho.¹ For these individuals, every day can be a struggle as they face limited physical mobility and chronic, often-painful health conditions.

Financial stress is also a major problem for people with disabilities, both in Idaho and the U.S.² Thirty-four percent of adults with disabilities in the U.S. live in households with annual incomes below \$15,000.³ A meaningful safety net is essential for such individuals.

In recognition of this, the federal government provides 17,761 elderly and disabled Idahoans a small cash assistance grant – a maximum of \$512 a month – through the Supplemental Security Income (SSI) program.⁴ This small benefit is intended to meet the special needs of SSI recipients and is designed to supplement, **not to replace**, other sources of income, including income from cash assistance programs.

At least twenty-one percent (3,710) of Idaho's 17,761 SSI recipients and their families (SSI families) are poor enough to qualify for additional cash assistance from the state in order to meet their basic needs.⁵ Several harmful rules in Idaho, however, block them from the modest cash assistance available to other very poor families. Idaho stands alone as the only state in the country that denies this critical assistance to SSI families.

The Herrera family is typical. Under current Idaho rules, Marlin Herrera's federal SSI benefits disqualifies the family from receiving state cash assistance. These rules have pushed the family further into hardship and poverty.

In 1996, after twenty years working as a meter reader, a herniated disk forced Marlin Herrera to quit his job. Marlin now struggles to care for

his two children, 11-year-old Bryson and 9-year-old Ruth, while coping with his disability. With a fixed income of \$530 a month from a small retirement check and SSI, the family of three is barely keeping their heads above water.

The Herrera's monthly income of \$530 equals 45 percent of the federal poverty level for a family of three. This meager sum is only a fraction (21 percent) of what it takes for a family of three in Idaho to meet all its basic needs, deal with emergencies and plan ahead without resorting to public assistance.⁶

Marlin is desperately trying to find other ways to support himself and his family. He has applied for another meter reader position at Idaho Power, although the job may further jeopardize his health and, as a result, his ability to care for Ruth and Bryson. "I just cannot support myself and my children on \$530 a month."

As the Herrera family's story shows, Idaho's current policies do not help and actually create further stress and deprivation for fragile SSI families. These policies harm not only the disabled family member, but also the entire family because:

- Poverty and hardship increases when SSI benefits make otherwise eligible families ineligible for state cash assistance;
- SSI families have special and higher expenses than other families requiring state cash assistance;
- SSI families have less earning power than other families; and,
- Denying SSI families state cash assistance can force more people with disabilities into institutions.

Experts agree that this misguided policy is damaging to families.⁷ In addition, it is directly

contrary to the purpose of the SSI program. In fact, a bipartisan commission established by Congress, the National Commission on Childhood Disability, recommended that Congress prohibit states from enacting such a policy.⁸ Today, no other state in the nation considers SSI income when determining cash assistance eligibility.

Idaho policy relegates people with disabilities and their families to poverty by forcing them to survive on the meager income provided by SSI, an income which just barely places them at 43 percent of the federal poverty level for a family of three.⁹ This means that they are unable to meet their basic needs.

The Idaho Community Action Network (ICAN) recommends that the Idaho Department of Health and Welfare (DHW) eliminate this harmful policy by changing the rules governing two state programs: Aid to the Aged, Blind and Disabled (AABD) and Temporary Assistance for Families in Idaho (TAFI). Specifically, DHW should:

- **Allow eligible individuals who receive a state SSI supplement through the AABD program to receive state cash assistance.**
- **Add SSI benefits to the list of “Excluded Income” for TAFI or add SSI recipients to the list of “Individuals Excluded From Family Size.”**
- **Increase the amount of unearned income families can receive and still be eligible for state cash assistance.**

Due to the unique hardships SSI families like the Herreras face, a meaningful safety net is critical. These changes will ensure that SSI families have access to a safety net and that Idahoans are not penalized for being both poor and disabled.

II. THE PROBLEM: Idaho rules block SSI families from receiving state cash assistance.

Of the 17,761 SSI recipients in the state of Idaho, at least 3,710 (21 percent) live in families poor enough to be eligible for state cash assistance. Idaho, however, denies SSI families this much-needed safety net. It is the sole state in the country to do so.

Every other state in the nation recognizes that the modest SSI benefit is intended to meet the special needs of the SSI recipient alone and is not designed to support entire families. Idaho is the only state to insist that the SSI benefit received by an individual disqualifies the recipient’s entire family from receiving much-needed state cash assistance.

As a result, whole families in Idaho must survive on a SSI benefit intended to support one person. This benefit, which totals \$512 a month at most, is an insufficient sum to support a family considering that the federal government deems a single individual earning less than \$696 a month to be living in poverty.¹⁰

Current Idaho regulations for two state programs -- Aid to the Aged, Blind and Disabled (AABD) and Temporary Assistance for Families in Idaho (TAFI) -- block SSI families from receiving state cash assistance. (For more about these programs, see the box on page 5.) As a result, Idahoans are penalized for being both poor and disabled.

About SSI and AABD

SSI (Supplemental Security Income) and AABD (Aid to the Aged, Blind and Disabled) are programs which provide cash assistance to aged, blind and disabled people (including children under age 18) who have limited income and resources. AABD is a state extension of the federal SSI program that provides supplemental benefits to SSI recipients. Most people eligible for SSI are also eligible for AABD.

SSI should not be mistaken for SSDI. SSDI provides benefits to disabled or blind individuals who are "insured" by workers' contributions to the Social Security trust fund.¹¹ To be eligible to receive benefits under this program, the worker must have worked and paid Social Security taxes for enough years to be covered under Social Security insurance, and some of the taxes must have been paid in recent years.

The Purpose of SSI and AABD

The purpose of the SSI program is to "assure a minimum level of income for people who are blind or disabled, or who are age 65 or over, and who do not have sufficient income and resources to maintain a standard of living at the established federal minimum income level."¹² The purpose of AABD, as stated in Idaho statutes, is very similar. (Idaho Code 56-207, 56-208, 56-209a.)

SSI payments are intended to be used to meet the needs of the SSI beneficiary. These funds are not intended to be available to cover other family costs.

Eligibility and Benefit Levels for SSI and AABD

In order to be eligible for SSI, individuals must be U.S. citizens with little or no income or resources and be considered medically disabled.¹³ An individual may not have resources totaling more than \$2,000 in any given month. The resource limit for a couple is \$3,000. Persons eligible for SSI are generally also eligible for AABD. SSI recipients are also automatically eligible for Medicaid in Idaho.

The maximum federal SSI benefit for an individual is \$512 per month. Not all individuals qualify for the total grant amount. The average SSI payment per month, per individual, is \$327.95. The average AABD supplemental payment per month, per individual, is \$85.89.

In Idaho the majority of SSI families are automatically ineligible for state cash assistance due to the following rules:

- A family cannot receive assistance from more than one state public program;¹⁴
- A family cannot have more than \$293 in unearned income; and,¹⁵
- SSI recipients must be considered a part of the family when determining a family's eligibility for state cash assistance.¹⁶

Consequently, the meaningful safety net that families have access to in other states is out of reach for Idaho's SSI families.

RULE #1: A family cannot receive assistance from more than one state public program.

In Idaho, a family cannot receive assistance from more than one state public program. This rule affects the 58 percent of all SSI families in Idaho who receive a small *state* SSI supplement (not to be confused with the federal SSI benefit.)¹⁷ Receiving this small state supplement makes SSI families ineligible for any other state program, including cash assistance.¹⁸

Consider a typical family harmed by this policy: an unemployed mother with two children, one of whom is disabled and receives SSI. The mother is unable to work because her disabled child requires her full-time care. The child receives the maximum federal SSI benefit of \$512 a month and an additional state SSI supplement of \$53. Although this amount is far below what it takes a family to survive in Idaho, this family is not eligible for state cash assistance. Consequently, the entire family is forced to live off the \$565 the disabled child receives from SSI.

Even if this family decided to forgo the state supplement to escape this problem, the family would still be disqualified from receiving state cash assistance because of the two other harmful rules.

RULE #2: A family cannot have more than \$293 in unearned income.

The second rule that keeps a SSI family from getting state cash assistance in Idaho dictates that a family cannot have more than \$293 in unearned income. Unearned income is income from non-work-related sources. Idaho treats SSI benefits as unearned income. Idaho law does allow family members to earn some income through work. SSI families, however, often cannot work.

Because the maximum SSI payment is \$512 a month, and because many SSI families are not able to supplement this with work-related income, Idaho excludes at least 3,710 SSI families – or 21 percent - from receiving state cash assistance.¹⁹

An example of a typical family that this policy affects is a low-income couple with two children. The husband is severely disabled and receives SSI. The wife cannot work due to care-taking responsibilities. All the family's income is from SSI, an unearned source of income according to Idaho's rules. The husband gets \$512 a month in SSI benefits. He is willing to forego the state SSI supplement in order to receive state cash assistance. Yet, this family would still not be eligible for assistance because the husband's \$512 SSI benefit is considered unearned income and families cannot have more than \$293 in unearned income and still be eligible for state cash assistance.

Note that Idaho rules already specify that certain types of unearned income should be disregarded when calculating a family's

eligibility for cash assistance. Examples of unearned income that the state disregards are:²⁰

- Child's Earned Income
- Child Support
- Money Gifts
- Tax Refunds
- Food Programs
- Child and Elderly Nutrition
- Low-income Energy Assistance
- Housing Subsidies
- Native American Payments
- Educational Income
- VA Vocational Assistance
- Disaster Relief

SSI benefits are not on this list.²¹ Thus, because the SSI benefit exceeds the \$293 limit and because the state does not disregard SSI benefits, SSI families are ineligible for state cash assistance.

RULE #3: SSI recipients must be considered a part of the family when determining a family's eligibility.

The third rule in Idaho that keeps an SSI family from getting state cash assistance specifies that SSI recipients must be considered a part of the "family unit."

Idaho determines whether a family is eligible for state cash assistance by calculating the combined income of all family members in the family unit and by establishing whether that income falls below certain limits. While Idaho excludes some family members from the family unit when making these calculations, it does not exclude SSI recipients. (In technical terms, SSI recipients are not treated as "individuals excluded from family size.")²²

As a consequence, the SSI benefits of disabled family members are included when calculating a

family's eligibility for cash assistance. The result is that, in many instances, because of an individual's disability and the SSI benefit they receive to meet special needs arising from this disability, the entire family becomes ineligible for cash assistance.

* * * * *

These three rules for Aid to the Aged, Blind and Disabled (AABD) and Temporary Assistance for Families in Idaho (TAFI) unfairly prevent SSI families from receiving much needed state cash assistance.

Idahoans are being penalized for being both poor and disabled. Idaho is the only state in the nation to have this kind of policy on the books. These rules should be changed.

III. WHY IDAHO SHOULD CHANGE ITS RULES

Idaho should join every other state in the country in allowing eligible SSI families to receive state cash assistance. Here is why.

REASON #1: Poverty and hardship increase when SSI benefits make otherwise eligible families ineligible for state cash assistance.

Studies confirm that policies which exclude SSI recipients from state cash assistance result in increased poverty and hardship. For example, in Wisconsin SSI families excluded from state cash assistance after welfare reform experienced a significant drop in total monthly income ranging from 30 percent to 60 percent. Those same families also struggled to meet basic needs. (Sixty percent of families reported that they could not afford to buy enough food for

their families on their current income.)²³ Wisconsin no longer has such a policy.

Forcing families to survive on the meager income provided by SSI, an income which is barely 43 percent of the federal poverty level for a family of three, compromises the ability of SSI families to live independently and with dignity. The cost of living for a family of three in Idaho is at least \$2,500 a month.²⁴ This is almost five times the maximum monthly SSI benefit. By denying SSI families state cash assistance, Idaho consigns many of these families to extreme poverty.

REASON #2: Idaho rules that count SSI benefits when determining state cash assistance eligibility are directly contrary to the purpose of the SSI program.

According to Social Security Administration guidelines and regulations, SSI payments are intended to meet the needs of the SSI beneficiary. These funds are not intended to cover the costs of other family members.²⁵ The 1997 Social Security Handbook states that SSI "payments [are] for the use and benefit of the entitled individual. Social Security benefits are properly disbursed if they are:

- spent for the beneficiary's current and reasonably foreseeable needs, or
- saved and invested for the beneficiary, if current needs are being met."²⁶

Penalties, including fines and imprisonment, can be imposed for the misuse of funds, including using benefits to support someone other than the eligible person.²⁷ In short, Idaho rules that count SSI benefits as available to meet the needs of the entire family violate the Social Security Administration's SSI guidelines and regulations.

REASON #3: Idaho rules do not take into consideration the special expenses which come with caring for a disabled person.

Families with disabled members have expenses that other families do not. Examples include:²⁸

- Food: Some individuals have special dietary requirements that may result in higher food costs.
- Transportation: Where public transportation is not an option, either because it is unavailable or because a person's disability precludes its use, families with a disabled member may need a vehicle and may need to make expensive modifications to that vehicle.
- Clothing: If standard clothing cannot accommodate a person's disabilities, special clothing may be necessary.
- Housing: Because of a disabled person's special needs, such as the need for wheelchair accessibility, housing options are often both limited and expensive. Families may need to make costly modifications to their homes in order to accommodate a disabled family member.
- Utilities: Electrical devices such as a respirator may result in higher utility bills.
- Diapers: Some individuals may require special, expensive disposable diapers.
- Child Care: Special or extended child care is often necessary for children with disabilities. The cost of such care can be very expensive. Short-term care for a disabled child in order for a parent to meet other obligations (such as the needs of the rest of the family) can also be very expensive.

Total disability-related expenditures for a family can amount to more than \$26,000 a year (or more than \$2,100 a month).²⁹ Idaho policy does not factor in the higher expenses that SSI families face.

REASON #4: SSI families have less earning power than other families.

Disabled adults and the elderly receive SSI benefits because they are unable to support themselves. Only 19 percent of SSI recipients work.³⁰ The SSI benefit is intended to be a partial substitute for the income most SSI recipients are unable to earn.³¹

When the disabled SSI recipient is a child, care-taking responsibilities can significantly limit the ability of a parent to work.³² The Committee on Childhood Disability states that low-income families, "given already marginal incomes, face a particular burden of foregone earnings while meeting the disability-related needs of their child."³³

Idaho policy ignores these facts and assumes incorrectly that SSI families have the same earning power as other families needing state cash assistance.

REASON #5: Denying SSI families state cash assistance can force more people with disabilities into institutions.

State cash assistance can allow some SSI families to keep a disabled family member at home rather than in an institution. This in turn enables individuals with disabilities to pursue more independent and self-sufficient lives. Idaho policy, which prevents otherwise eligible SSI families from receiving such state cash assistance, can force individuals with disabilities to forgo life at home for life in an institution.

Moreover, the cost of providing state cash assistance to a family with a disabled member is far less than the cost of foster care, assisted living, or institutions. Out-of-home placement ranges from \$24,000 annually for specialized foster care to \$95,000 annually for care in a state institution.³⁴

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When Idaho prevents SSI families from accessing state cash assistance, the consequences are harsh: decreased self-sufficiency, and increased family stress, hardship and poverty. Idaho should change its rules so that SSI families are not without the safety net they need.

IV. RECOMMENDATIONS

The Idaho Community Action Network (ICAN) recommends that the Idaho Department of Health and Welfare (DHW) amend its administrative rules so that SSI recipients are not excluded from state cash assistance. Specifically, we recommend:

- Allowing eligible individuals who receive a state SSI supplement through the AABD program to also receive state cash assistance;
- Adding SSI benefits to the list of “Excluded Income” for TAFI, or adding SSI recipients to the list of “Individuals Excluded From Family Size,” and,
- Increasing the amount of unearned income families can receive and still be eligible for state cash assistance.

If these administrative rules are amended, SSI families in need will be able to qualify for state cash assistance and increase their chances of escaping poverty.

RULE CHANGE #1: Allow eligible individuals who receive a state SSI supplement through the AABD program to also receive state cash assistance.

Current AABD and TAFI rules state that “if a person is potentially eligible for either AABD cash, TAFI, or foster care, only one (1) program may be chosen.”³⁵ The result is that SSI families who receive a state supplement cannot receive state cash assistance. Idaho should amend this so that SSI families can receive concurrent benefits.

RULE CHANGE #2: Add SSI benefits to the list of “Excluded Income” for TAFI or add SSI recipients to the list of “Individuals Excluded From Family Size.”

Current TAFI rules state that “all earned and unearned income is counted in determining eligibility and grant amount, unless specifically excluded by rule.”³⁶ The result is that the income received by a SSI recipient is counted in determining a family’s eligibility, effectively disqualifying the entire family from receiving state cash assistance. Idaho should either add SSI benefits to the list of “Excluded Income” or add SSI recipients to the list of “Individuals Excluded From Family Size.”³⁷

RULE CHANGE #3: Increase the amount of unearned income families can receive and still qualify for state cash assistance.

Current TAFI rules regarding the amount of unearned income a family can receive and still be eligible for assistance state that, regardless of family size, “the maximum [monthly] grant is two hundred ninety-three dollars (\$293).”³⁸

Idaho should increase this amount so that eligible SSI families can receive state cash assistance.

These three changes to the Idaho administrative rules governing AABD and TAFI have the potential of helping lift out of poverty, at the very least, 3,710 disabled persons and their families.³⁹

is designed to support families and to promote family cohesiveness – in fact pushes already fragile families into further emotional and financial crises. Idaho regulations that exclude SSI families from state cash assistance are detrimental to family well-being and have severe repercussions. Without such changes, Idaho will continue to be the sole state in the nation to penalize disabled individuals and their families with the misfortune of being poor.

V. CONCLUSION

SSI families are, by definition, poor. Idaho's punitive rules discussed above put families trying to cope with illness and disability under even more severe economic pressure. Idaho is unjustly denying SSI families essential public assistance funds. The Idaho Department of Health and Welfare should change its rules so that eligible SSI families can receive state cash assistance. These rules should be changed because:

- Poverty and hardship increases when SSI benefits make otherwise eligible families ineligible for state cash assistance.
- Idaho policy that counts SSI benefits when determining state cash assistance eligibility is directly contrary to the purpose of the SSI program.
- SSI families have special and higher expenses than other families requiring state cash assistance.
- SSI families have less earning power than other families.
- Denying SSI families state cash assistance can force more people with disabilities into institutions.

A change in Idaho rules is long overdue. Idaho's welfare policy – a policy the state claims

About the Organizations Releasing This Report

The Idaho Community Action Network (ICAN) serves as a powerful, consolidated voice for Idaho's poor, with chapters and membership clusters in six Idaho communities, including the state's three largest cities and numerous rural towns. Through ICAN, low-income Idaho families have a voice in the decisions that impact their lives. In addition to its direct action work, ICAN runs a statewide, volunteer-driven food program that helps low-income families supplement their monthly budgets. ICAN's community organizing model integrates the provision of food with training, leadership development and action on issues.

The Northwest Federation of Community Organizations (NWFCO) is a regional federation of five statewide, community-based social and economic justice organizations located in the states of Idaho, Montana, Oregon and Washington: Idaho Community Action Network (ICAN), Montana People's Action (MPA), Oregon Action (OA), Washington Citizen Action (WCA) and Coalition of Montanans Concerned with Disabilities (CMCD). Collectively, these organizations engage in community organizing and coalition building in fourteen rural and major metropolitan areas, including the Northwest's largest cities (Seattle and Portland) and the largest cities in Montana and Idaho.

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VI. ENDNOTES

¹ David Scudder and Michael Willmorth, "Independent Living for Idahoans with Disabilities: An Assessment of Existing Needs," Boise State University, Boise, Idaho, March 1995,

<<http://www2.state.id.us/silc/bsusurv.htm>>.

² Ibid.

³ Coalition for West Virginia's Children, "West Virginia Works and the Department of Health and Human Resources' SSI Policy," Charleston, West Virginia, November 1998, p. 3.

⁴ Of the 17,761 that received SSI in 1999, 1,829 were aged, 172 were blind and 15,760 were disabled. Social Security Administration, "Annual Statistical Supplement 2000," *Social Security Bulletin*, Baltimore, Maryland, July 5, 2000, Tables 7.B2 and 7.B3.

⁵ The term "SSI families" is used to mean SSI recipients and their families. Technically, families can not receive SSI because SSI benefits are designed to support the special needs of the recipient alone.

⁶ Northwest Policy Center and Northwest Federation of Community Organizations, "Northwest Job Gap Study," Seattle, Washington, January 1999, p. 24.

⁷ For example, see Jerry Mashaw, James Perrin and Virginia Reno, "Restructuring the SSI Disability Program for Children and Adolescents," Report of the Committee on Childhood Disability of the Disability Policy Panel, Washington, D.C., 1996.

⁸ National Commission on Childhood Disability, "Report to Congress: Supplemental Security Income for Children with Disabilities," Washington, D.C., October 1995, p. 74, as cited by Sharon Parrott in "SSI Benefits Should Not Be Considered When Determining Family Members' Eligibility for Cash Assistance," Center on Budget and Policy Priorities, Washington, D.C., March 5, 1999, p. 8.

⁹ U.S. Census Bureau, "HHS Poverty Guidelines 2000," <<http://aspe.hhs.gov/poverty/00poverty.htm>>.

¹⁰ Ibid.

¹¹ This is the Federal Insurance Contributions Act (FICA). These contributions are the social security tax paid on an individual's earnings or the earnings of a spouse or parent.

¹² 20 CFR 416.110.

¹³ In addition, recipients must file for any and all other benefits for which they may be eligible and must accept vocational rehabilitation services, if referred. In other words, recipients are expected to pursue all other possible means of income, including paid work.

¹⁴ "Concurrent Benefit Prohibition" IDAPA 16.03.08.113 (TAFI), and "Concurrent Benefit Prohibition" 16.03.05.092 (AABD).

¹⁵ IDAPA 16.03.08.248.

¹⁶ IDAPA 16.03.08.06.

¹⁷ This is the Idaho AABD supplement, which on average is \$85.89 a month. Social Security

Administration, "SSI: Number of Persons Receiving State-Administered Supplementation, Total Amount and Average Payment," Office of Research, Evaluation and Statistics, Baltimore, Maryland, Table 7.B2, July 5, 2000.

¹⁸ IDAPA 16.03.08.113: "If an individual is potentially eligible for either TAFI or AABD, only one (1) program may be chosen." See also IDAPA 16.03.05.092.

¹⁹ Based on number of persons receiving AFDC in July-September 1996, and the number of persons citing SSI benefits as the reason why they no longer received cash assistance. Idaho Department of Health and Welfare, "Quarterly Welfare Statistical Bulletin," Table 1, Boise, Idaho, July-September 1996, and Idaho Department of Health and Welfare, "AFDC – TAFI Case Changes," Research and Statistics, Boise, Idaho, September 7, 1997.

²⁰ This list is not exhaustive. Additional income exclusions include: Supportive Services; Work Reimbursements; Loans, Third Party Payments; TAFI (retroactive grants); Social Security Overpayment; Interest Income; EITC Payments; Adoption Assistance; Disability Insurance Payments; Sales Contract Income; Foster Care; Interest Income; Home Energy Assistance; Utility Reimbursement Payment; Housing and Urban Development Interest; Educational Income; VA Vocational Assistance; Work Study Income of a student, Senior Volunteers; Relocation Assistance; Radiation Exposure Payments; Agent Orange; Spina Bifida; Japanese-American Restitution Payments; and, Visa Payments. IDAPA 16.03.08.215.

²¹ IDAPA 16.03.08.214.

²² IDAPA 16.03.08.240.

²³ Caroline Hoffman and Amy Fisher, "Families in Poverty: Parents with Disabilities and Their Children," Wisconsin Council on Developmental Disabilities, Madison, Wisconsin, November 1998. After welfare reform, Wisconsin enacted a policy similar to Idaho's that excluded SSI families from state cash assistance then repealed it.

²⁴ Northwest Policy Center and Northwest Federation of Community Organizations, p. 24.

²⁵ American Friends Service Committee, "SSI Policy Hurts Disabled People and Families," *Without a Net*, Charleston, West Virginia, vol. 2, no.1, May 1998, p. 7.

²⁶ As cited in Coalition for West Virginia's Children, "West Virginia Works and the Department of Health and Human Resources' SSI Policy," Charleston, West Virginia, November 1998, p. 3.

²⁷ Ibid.

²⁸ Parrott, p. 6.

²⁹ United States General Accounting Office, "SSI Children: Multiple Factors Affect Families' Costs for Disability-Related Services," Report to Congressional Committees, GAO/HEHS-99-99, Washington, D.C., June 1999, p. 5.

³⁰ Social Security Administration, "2000 SSI Annual Report," Baltimore, Maryland, May 30, 2000, Table

V.E1. In 1999, 6,556,634 persons received SSI nationwide, of which 340,618 engaged in some type of work activity.

³¹ Parrott, p. 3.

³² The National Academy of Social Insurance concluded that “there is a clear rationale and a compelling need for cash support for families with a disabled child. The basic purpose of these benefits is to support and preserve the capacity of families to care for their disabled children in their homes...Without these supports, disabled children would be at much greater risk of losing both a secure home environment and the opportunity for integration into community life, including the world of work.” As cited in Parrott, p. 3.

³³ Mashaw, et al., p. 17.

³⁴ Ibid.

³⁵ This quote is from the TAFI rules laid out in IDAPA 16.03.08.113. For AABD rules, see IDAPA 16.03.05.092.

³⁶ IDAPA 16.03.08.214.

³⁷ IDAPA 16.03.08.240.

³⁸ IDAPA 16.03.08.248.

³⁹ Based on number of persons receiving AFDC in July-September 1996, and the number of persons citing SSI benefits as the reason why they no longer received cash assistance. Idaho Department of Health and Welfare, “Quarterly Welfare Statistical Bulletin,” Table 1, Boise, Idaho, July-September 1996, and Idaho Department of Health and Welfare, “AFDC – TAFI Case Changes,” Research and Statistics, Boise, Idaho, September 7, 1997.