



November 27, 2023

<Submitted via Federal eRulemaking portal>

U.S. Social Security Administration  
Office of Legislation and Congressional Affairs  
Regulations and Reports Clearance Staff, MS 3253  
Mail Stop 3253 Altmeyer  
c/o Mrs. Tamara Levingston  
6401 Security Boulevard  
Baltimore, MD 21235

**CARROL CHRISTIAN**  
*KS – President*

**ASHLEY WILKES**  
*FL – President-Elect*

**CHRISTOPHER O’NEIL**  
*FL – Vice-President*

**ELLIS BRYSON**  
*WV – Secretary*

**ANDREW PETITT**  
*WV – Treasurer*

**LAURA LINDSEY**  
*KS – Business Manager*  
[UCOWFmail@gmail.com](mailto:UCOWFmail@gmail.com)

**ANDY McCLENAHAN**  
**DAWN ROYAL**  
*Co-Chairmen Directors*  
*Intergovernmental*  
*Committee*

[Dawn.Royal.UCOWF@gmail.com](mailto:Dawn.Royal.UCOWF@gmail.com)  
[Andrew.K.McClenahan@gmail.com](mailto:Andrew.K.McClenahan@gmail.com)

United Council on  
Welfare Fraud  
PO Box 164  
Westmoreland, KS 66549  
785.477.5424  
[www.ucowf.net](http://www.ucowf.net)

**RE: Docket # SSA-2023-0015**

Dear Tamara Levingston,

The United Council on Welfare Fraud (UCOWF) is grateful for the opportunity to submit our comments to the U.S. Social Security Administration (SSA) Notice of Proposed Rulemaking (NPRM), “Expand the Definition of a Public Assistance Household” published September 29, 2023. UCOWF is dedicated to combating waste, fraud, and abuse in our nation’s public assistance programs. We represent local, state, and federal employees directly connected to the Supplemental Nutrition Assistance Program (SNAP) and tasked with upholding program integrity and stewardship of taxpayer resources, including Social Security Insurance (SSI).<sup>1</sup>

As the exclusive national organization with a singular focus on detecting, preventing, prosecuting, and recovering welfare fraud, we have received direct responses from members on the notice of proposed rulemaking. We request that this feedback be considered with other comments received.

The SSA efforts to streamline and align eligibility definitions and requirements with other public assistance programs is reasonable and a worthwhile endeavor. However, UCOWF disagrees with the NPRM and believes it should be withdrawn for the following reasons:

1. We are surprised to see the expansion of the definition of a public assistance household with little to no prior public discussions. In fact, the definitions of a household composition significantly differ between SSI and SNAP – a point glaringly missing from the NPRM. Such a significant change typically is preceded by greater discussion and input from interested parties with relevant justification and data analytics supporting the position. In this case, we are not aware of prior public input as typically found with an Advanced NPRM. This is especially concerning considering scoring costs of nearly \$16 billion. In addition, this NPRM appears to conflict with Fiscal Responsibility Act of 2023 which aligns new regulations with PAYGO. The NPRM does not identify where the PAYGO cuts to SSA federal budget will occur.
2. Inclusion of SNAP benefits as a public income maintenance (PIM) effort are misguided and will result in an increased financial burden on recipients. SNAP income and asset testing has changed drastically with the creation and expansion of Broad-Based

<sup>1</sup> Our membership consists of over 1,500 local, state, and federal employees sworn law enforcement and non-sworn (civilian) investigators, analysts, and improper payment recovery subject matter experts. For the last 50 years, UCOWF provides annual training on program integrity best practices, fraud trends, and provide eligible members with the only professional certification in our field. More information about us can be found on our website, [www.ucowf.net](http://www.ucowf.net).





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Categorical Eligibility (BBCE). This has contributed to a massive increase in SNAP participation rolls and a greater reliance on recipient self-attestation – the number one contributor to program overpayments. Using SNAP to confirm SSI eligibility will result in overpayments in multiple programs and place a larger financial burden on recipients to repay taxpayer funds misappropriated, either by client/agency error or fraud. As testimony in recent hearings has demonstrated, overpayments requiring debt collection and Treasury Offset Program recoupment places an unacceptable burden on some of the most vulnerable members of society. Further, UCOWF believes that the implementation of the proposed rule will increase the participation in SSI, not a decrease as imagined in this NPRM.

3. The SSA could reduce the administrative burden in determining eligibility if they conducted mandatory verifications of all income and assets in SSI applications. The current acceptance of self-attestations creates an environment favorable to first and third-party fraud, and the “pay and chase” implications in overpayment recoveries infers an administrative burden upon state and local welfare agencies. Should the SSA desire to reduce administrative burdens, it would be better served by conducting income and asset/resource verifications on all applicants to prevent the ripple-effect impacts upon other low-income public assistance programs SSI influences.

If you have any questions, please contact us at [UCOWFmail@gmail.com](mailto:UCOWFmail@gmail.com).

Sincerely,

Carrol Christian, UCOWF President

