



**CONSORTIUM FOR CITIZENS
WITH DISABILITIES**

Financial Security and Poverty

The Consortium for Citizens with Disabilities Financial Security and Poverty Task Force congratulates you on your election. We hope that the next four years are a time of great progress for people with disabilities. Because of the disproportionate number of people with disabilities living in poverty, our task force advocates for public policy that impacts people living in poverty, including the disproportionate number of people of color with disabilities living in poverty, and to improve the financial status of people with disabilities. The Task Force has several administrative priorities and we highlight them below for your review. We stand ready to work with you and your administration on these important issues for people with disabilities living in poverty and impacting the financial security of people with disabilities.

The Department of Agriculture:

- We urge the Administration not to finalize the Revision of Categorical Eligibility and Standardization of State Heating and Cooling Standard Utility Allowances rules.
- We urge the Administration to proactively expand the Supplemental Nutrition Assistance Program (SNAP) Online Purchasing Pilot program to all states and territories and extend eligibility for the program to more retailers.
- We urge the Administration to proactively expand the SNAP Restaurant Meals Program for people with disabilities and older adults. People with disabilities and older adults may not be able to prepare foods due to their disabilities and this available authority would also allow them to purchase hot prepared foods that are accessible to them. The agency should actively explain this program to states and advocate for it to be adopted.

The Office of Management and Budget:

- In May of 2020, the Office of Management and Budget (OMB) issued a Request for Comment on the Consumer Inflation Measures Produced by Federal Statistical Agencies that asked specifically about inflationary measures related to the federal poverty guidelines. The comments, including [ours](#), were not made public by OMB and we would urge OMB to publish those comments. We would also urge OMB to continue the crucially important work around the Supplemental Poverty Measure and consider other systemic ways to improve the federal measure of poverty.

The Social Security Administration and Department of Education:

- We urge the Administration to ensure that the Social Security Administration (SSA) and the Department of Education work together to share data and automatically discharge student loan debt for all Supplemental Security Income and Social Security disability beneficiaries who meet the statutory eligibility requirements for Total and Permanent Disability discharge. A recent SSA Office of Inspector General [report](#) identified over 20,000 of beneficiaries currently having their benefits offset despite being eligible for loan discharge under the currently unnecessarily strict regulatory process.

The Department of Treasury:

- We urge the Internal Revenue Service to revisit the recently finalized [regulations](#) implementing the Achieve a Better Life Experience (ABLE) program. We are very concerned about some of the decisions made in this final rule, in particular the extension of establishment and signature authority over the ABLE account on behalf of the designated beneficiary to representative payees appointed by the Social Security Administration, and believe the IRS should revisit this rule.
- We would urge the Internal Revenue Service to take active steps to reach out to people who may be eligible for Economic Impact Payments, especially those who may not otherwise need to file 2020 income taxes, working with both state and federal agencies with relevant data sources. If another round of stimulus checks are authorized, we encourage the agency to address all of the procedural issues highlighted in this [letter](#).

National Council on Disability:

- We support the current National Council on Disability efforts to coordinate cross-agency cooperation on the ABLE program. We believe that these efforts should be strengthened to include a comprehensive, cross-agency education and outreach campaign to increase utilization of ABLE accounts and a public report of ABLE program usage data. We strongly support additional Congressional funding for these efforts.

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