

November 1, 2019

SNAP Program Design Branch
Program Development Division
Food and Nutrition Service
3101 Park Center Drive
U.S. Department of Agriculture
Alexandria, VA 22302



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Submitted electronically

Re: Notice of Proposed Rule Making: Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP) RIN 0584-AE62

Dear SNAP Program Design Branch:

YWCA USA submits these comments on the proposed rule published at 84 FR 35570 (July 23, 2019), RIN 0584-AE62, with the title "Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP)."

Founded 160 years ago, YWCA is one of the oldest and largest women's organizations in the United States and is dedicated to eliminating racism, empowering women, and promoting peace, justice, freedom and dignity for all. Today, we serve over 2 million women, girls, and their families through a network of more than 200 local YWCA associations in over 1,300 communities across 45 states and the District of Columbia.

YWCA's comments on the United States Department of Agriculture's (USDA's) Proposed Rule are informed by our significant expertise in working with women and families across the country, which gives us practical insight regarding the impact the proposed rule will have on low-income women, women and families of color, and survivors of domestic and sexual violence: Each year, across our vibrant network, we are proud to provide:

- 145,000 women, children and families with housing, food assistance, and immigrant assistance programs;
- 535,000 women, children, and families with gender-based violence support services that are trauma-informed, and which include domestic violence and sexual assault programs and services (e.g., emergency shelter, transitional housing, crisis hotlines, counseling and court assistance, and other community safety programs), through 157 YWCAs across 44 states;
- 170,000+ children and parents with child care, teen and parenting programs, which include child care programs that specifically

integrate trauma-informed practices to meet the needs of homeless children, and children who have witnessed and experienced domestic violence and other trauma; and

- 300,000 women, girls, and families with wellness, recovery, counseling, exercise, athletics, and aquatics programs to help them get and stay healthy.

In addition:

- The vast majority (77%) of the individuals served by YWCAs are women and girls, and 62% - 72% live at or below the federal poverty level.
- Of the clients we serve, 46% are people of color: 37% are white; 21% are Black; 14% are Latinx; 3% are Asian; 2% are Native American / Alaska Native; 1% are Arab/Middle Eastern; and 4% are multi-racial.
- More than 82,000 women and girls each year enroll in economic advancement programming at YWCAs across the nation – the majority of whom live at or below the poverty level.

Because SNAP is vital to the economic security of women and families served by YWCA, particularly women and families of color and survivors of domestic violence and sexual assault, we write in opposition to any change in policy or regulation that would reduce the receipt of SNAP benefits by low-income women, families, and children.

I. SNAP is essential to the economic security of low-income women.

SNAP plays a critical role in reducing hunger, food insecurity, and poverty for millions of women and families. In 2018, SNAP lifted the incomes of more than 3.1 million people above the poverty line.ⁱ SNAP served more than 39.6 million people in nearly 19.7 million households on average each month,ⁱⁱ and women make up over half (63%) of non-elderly adult SNAP recipients overall.ⁱⁱⁱ

SNAP serves a diverse group of women, including elderly women and women with disabilities. White, non-Hispanic women make up 24% of nonelderly adult recipients, while 35% of nonelderly adult recipients are women of color.^{iv} In 2016, women were almost 48% of noncitizen recipients of SNAP.^v Further, in a national survey, 26.1% of lesbian, bisexual, transgender, and queer (LBTQ) survey respondents, and 41.2% of disabled LBTQ survey respondents reported receiving SNAP.^{vi} SNAP also serves a significant number of survivors of domestic and sexual violence - 31% of domestic violence survivors reported applying for food assistance since the abusive relationship began.^{vii}



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SNAP is the first line of defense against food insecurity for women, children, and families. Nearly one in nine U.S. households experience food insecurity during the year.^{viii}

- In 2018, 14% of women living alone faced food insecurity.^{ix}
- In 2018, 21% of households with Black, non-Hispanic heads of households and 16% of households Latinx heads of household were food insecure.^x
- In 2014, 27% of LGBTQ adult survey respondents said they experienced food insecurity (compared to 17% of non-LGBTQ survey respondents).^{xi}
- In 2013, the USDA documented that 33% of households with an adult age 18 to 64 with a disability who was not in the labor force, and 25% of households with adults in the same age range with other reported disabilities, were food insecure.^{xii}
- Food insecurity heightens the risk of rape, physical violence, or stalking by an intimate partner.^{xiii}
- In 2018, 11.2 million children lived in food-insecure households.^{xiv}
- In 2018, nearly 28% of households with children headed by a single woman faced food insecurity.^{xv}

II. Broad Based Categorical Eligibility provides states with the flexibility to ensure that women, children, and families struggling to make ends meet can put food on their table.

Eligibility for SNAP benefits are set by Congress with some important options provided to states. For more than 20 years, states have had the flexibility through Broad-Based Categorical Eligibility (BBCE) to adjust SNAP’s very low gross income and asset tests. BBCE supports the economic security of millions of low-income women, children, and families:

- **BBCE supports work by eliminating a “benefit cliff” workers face as their earnings rise.** Without BBCE, a small earning increase that results in a gross income over 130% of the federal poverty line (SNAP’s regular eligibility threshold) can lead to a substantial loss in SNAP benefits for a working family, especially families with high expenses for basic needs. BBCE allows states to modestly adjust the 130% FPL gross income threshold and set a more gradual benefit phase-out, which ensures workers who engage in slightly higher-paying work can still receive some food assistance through SNAP benefits.
- **BBCE’s elimination of the benefit cliff helps low-income families pay for other necessities that allow them to work.** BBCE is particularly important for states with higher costs of living where families with lower incomes



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have additional challenges stretching their dollars to cover their basic needs. Many families spend the majority of their income on everyday essentials like child care, health insurance, and housing that support their participation in the workforce. The high costs of these necessities absorb large portions of family budgets and leave fewer resources for other essentials like food. For example, in 2017, average annual child care costs ranged from nearly \$3,000 to over \$23,000 (depending on the care arrangement, the age of the child, and the state),^{xvi} and only 15 percent of children eligible for child care assistance under federal rules receive it.^{xvii} Given these expenses, working families, especially households headed by a single person, often rely on SNAP to put food on the table when their money must be used for other high-cost necessities.

- **BBCE helps low-income families save for future needs.** SNAP has a very low asset limit—families and individuals are disqualified from SNAP if they have managed to save as little as \$2,250 (or \$3,500 for households with elderly or disabled members). By using BBCE, states can open SNAP eligibility to women and families with income that qualifies them for SNAP, but who would otherwise be ineligible because they have managed to build modest savings to help get through future financial emergencies or own a reliable car.
- **BBCE makes administering SNAP simpler.** When families stop participating in SNAP because of a brief period of ineligibility or procedural reasons, then reapply once they’re eligible again, states face additional administrative costs and the families may face food shortages. BBCE reduces this “SNAP churn” by 26%, reducing administrative costs for states.^{xviii} BBCE also benefits low-wage workers. Nearly 23.8 million people work in the 40 lowest-paying jobs (typically paying less than \$12 per hour), including child care workers, personal care aides and home health aides, housekeepers, restaurant servers, cashiers, and more vital jobs for our economy.^{xix} Yet the low-wage workforce is plagued by unstable and unpredictable work schedules,^{xx} which can contribute to brief periods of ineligibility – and women make up nearly two-thirds (65%) of this workforce.^{xxi} BBCE helps these women feed their families during times of unsteady employment by alleviating the need for low-wage working families to reapply during each reduction in hours.

III. The proposed rule restricting BBCE would negatively impact the communities served by YWCA, particularly women of color and survivors of domestic and sexual violence.

A. Restricting BBCE threatens food assistance to low-income women, children, and families



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The proposed rule would eliminate SNAP benefits for about 1.7 million households and 3.1 million individuals in Fiscal Year (FY) 2020.^{xxii} This will impact low-wage working women, who are more likely than men in the low-wage workforce to have incomes subject to this proposed rule.^{xxiii} Of the more than 26 million people working in low-wage jobs (typically paying less than \$11 per hour), nearly six in ten are women—and women are close to seven in ten workers in the lowest-wage occupations that typically pay less than \$10 per hour.^{xxiv}

Nineteen percent of women in the low-wage workforce (and 21% of women of color in the low-wage workforce) have incomes between 130% and 200% of the FPL.^{xxv} Many women in this income range who currently receive SNAP are trying to improve their economic security through modest savings for future financial emergencies and have hefty child care, housing, and/or medical expenses that leave them with little left over to purchase food for their families. Yet the impact of this proposed rule on BBCE's flexibilities with the asset test and income test could take away their SNAP benefits.

Twenty-five percent of women in the low-wage workforce (and 29% of women of color in the low-wage workforce) have incomes below 130% of the FPL.^{xxvi} For any of these women who are trying to save a modest amount for future emergencies while receiving SNAP through BBCE, they could lose benefits because of this proposed rule's impact on the asset test BBCE flexibility.

While women of all races are overrepresented in the low-wage workforce compared to their share of the overall workforce, women of color are especially disproportionately represented in the low-wage workforce. Nearly one-third (31.6%) of women in the low-wage workforce are women of color: 11.1% are Black, 15.6% are Latinx, 4.3% are Asian or Pacific Islander, and .6% percent are American Indian/Alaska Native.^{xxvii}

Many low-wage jobs that are primarily held by women—such as cashiers, maids and housekeepers, personal and home care aides, and restaurant servers—have work schedules that are often unpredictable, unstable, and inflexible.^{xxviii} Many offer only part-time work (48.6% in the low-wage workforce compared to 26.5% in the overall workforce),^{xxix} despite many workers' need for full-time hours. Women working part-time often do so due to problems accessing affordable child care or other family or personal obligations. And women in low-wage jobs are especially likely to face discrimination and harassment at work, which can result in lost hours or



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voluntary or involuntary job loss.^{xxx} This proposed rule would penalize these women further by making it harder to maintain SNAP while trying to access caregiving arrangements that would allow them to work more hours to improve their economic security.

By proposing a rule that prevents states from allowing people with high child care, housing, and/or medical costs who are earning just above the income eligibility level to receive some food assistance, the USDA ignores working families' struggle to make ends meet. Furthermore, if children lose access to free school meals because they lose SNAP under this proposed rule, their parents and caregivers will have to pay for school meals—a cost some may not be able to bear.

B. Restricting BBCE threatens vital food assistance to survivors of domestic violence or sexual assault

Survivors of domestic violence and sexual assault often face unique challenges and barriers at the intersection of gender-based violence and economic hardship.

Women living in poverty experience domestic violence at twice the rate of those who do not, and the violence perpetrated against them can make it impossible to climb out of poverty.^{xxxi} In order to exercise control over their partners, abusers often actively prevent their partner from attaining economic independence by sabotaging their partner's economic stability. For example, abusers may interfere with survivors' access to financial resources, education, employment, child care, or health care; engage in reproductive coercion; ruin the survivor's credit; leave the survivor with tax debt; and more.^{xxxii}

Abuse can also result in survivors falling into poverty; violence often undermines survivors' ability to work, have a place to live, and do what is necessary to pursue a more stable life for themselves and their children.^{xxxiii} Ending an abusive relationship, moreover, may mean losing not only access to a partner's income, but also housing, health care, or child care. Furthermore, survivors in marginalized and underserved communities (such as people of color, LGBTQ people, immigrants, and people with disabilities) often face intersecting forms of discrimination that exacerbate their likelihood of facing economic instability.^{xxxiv}

Accessing public benefits that help meet basic needs, including SNAP, is therefore imperative for women's safety.^{xxxv} Survivors' access to SNAP is fundamental to determining whether they can leave an abusive relationship^{xxxvi} and is critical to helping them establish a safer and more



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stable life. In a 2017 survey of service providers working with survivors, over 88% of respondents said that SNAP is a very critical resource for most domestic violence and sexual assault survivors.^{xxxvii} In a recent survey of service providers about victims' experiences accessing SNAP, 88% of respondents indicated that SNAP is a critical resource for a significant number of victims with whom they work, and nearly 80% of respondents reported that most domestic violence victims rely on SNAP to help address their basic needs and to establish safety and stability.^{xxxviii}

By the Center for Disease Control's (CDC) own account, programs and policies strengthening economic supports help reduce the risk factors for intimate partner violence.^{xxxix} The CDC identifies SNAP as a program that can strengthen household financial security through providing cash benefits to low-income households, representing an evidence-based approach to reduce risk factors for intimate partner violence.^{xl} Simply put, when survivors have stable access to resources that help them build economic resiliency – including programs like SNAP – they and their families are much more likely to remain safe and secure.

Unfortunately, individuals working with survivors have identified a variety of barriers that keep survivors from safely accessing SNAP benefits, or that serve as reasons why victims may lose benefits or not get the full range of services SNAP provides.^{xli} In one study, only 58% of individuals working with survivors reported that survivors of domestic violence had access to SNAP when they needed it, and 44% of those working with sexual assault survivors reported that these survivor had access.^{xlii} BBCE is one way states can make it easier for survivors to access SNAP. This proposed rule, however, would increase the burden survivors must overcome to access SNAP and would reduce access not only SNAP, but also WIC and free school meals, for survivors and their families. Consequently, the USDA should withdraw this proposed rule and instead focus on improving access to food and nutrition programs to increase the safety and well-being of survivors and their families.

Under the current rules, states have the flexibility to use BBCE to effectively provide food assistance to low-income women, children, and families, and have been doing so for more than 20 years. Any change that would restrict, impede, or add uncertainty to states' current ability to do so must not be pursued.

To address these and other concerns, YWCA strongly urges the Department to withdraw the proposed rule in its entirety and to reject any proposals that would cause more women and families to face an increased risk of food and economic insecurity.

YWCA appreciates the opportunity to share our views with you. If you have any questions, please contact YWCA USA Vice President of Public Policy and Advocacy Catherine Beane, at cbeane@ywca.org or 202-835-2354.

Sincerely,



Alejandra Y. Castillo, CEO YWCA USA



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ⁱ Page 10 of <https://census.gov/content/dam/Census/library/publications/2019/demo/p60-268.pdf>

ⁱⁱ U.S. DEP'T OF AGRIC., SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM, NATIONAL LEVEL ANNUAL SUMMARY, PARTICIPATION AND COSTS, available at <https://fns-prod.azureedge.net/sites/default/files/resource-files/34SNAPmonthly-5.pdf>.

ⁱⁱⁱ Nat'l Women's Law Ctr. calculations based on U.S. Dep't of Agric., Characteristics of Supplemental Nutrition Assistance Program Households: Fiscal Year 2016 – Table A.23 – Gender and SNAP Benefits of Participants by Selected Demographic Characteristics 62 (Nov. 2017), available at <https://fns-prod.azureedge.net/sites/default/files/ops/Characteristics2016.pdf>.

^{iv} Nat'l Women's Law Ctr. calculations based on U.S. CENSUS BUREAU, 2017 CURRENT POPULATION SURVEY using STEVEN RUGGLES ET AL., INTEGRATED PUBLIC USE MICRODATA SERIES (IPUMS): VERSION 6.0 [Machine-readable database] (Minneapolis: University of Minnesota, 2015).

^v Nat'l Women's Law Ctr. calculations based on U.S. Census Bureau, 2017 Current Population Survey, using Sarah Flood et al., Integrated Public Use Microdata Series (IPUMS): Version 6.0 [Machine-readable database] (Minneapolis: University of Minnesota, 2018) (hereinafter "2017 Current Population Survey").

^{vi} CAITLIN ROONEY, CHARLIE WHITTINGTON & LAURA E. DURSO, CTR. FOR AM. PROGRESS, PROTECTING BASIC LIVING STANDARDS FOR LGBTQ PEOPLE (Aug. 2018), available at <https://cdn.americanprogress.org/content/uploads/2018/08/10095627/LGBT-BenefitCuts-report.pdf>.

^{vii} The Nat'l Domestic Violence Hotline, Nat'l Res. Ctr. on Domestic Violence, & Nat'l Latin@ Network, We Would Have Had to Stay (Nov. 2018), available at https://vawnet.org/sites/default/files/assets/files/2018-11/NRCDV_PublicBenefits-WeWouldHaveHadToStay-Nov2018.pdf.

^{viii} Alisha Coleman-Jensen et al., U.S. Dep't of Agric., Household Food Insecurity in the United States in 2018, at 6 (2019), <https://www.ers.usda.gov/webdocs/publications/94849/err-270.pdf?v=963>.

^{ix} *Id.* at 14.

^x *Id.* at 14.

^{xi} Taylor N.T. Brown, Adam P. Romero & Gary J. Gates, The Williams Inst., Food Insecurity and SNAP Participation in the LGBT Community 2 (2016), available at <http://williamsinstitute.law.ucla.edu/wp-content/uploads/Food-Insecurity-and-SNAP-Participation-in-the-LGBT-Community.pdf>.

^{xii} Alisha Coleman-Jensen & Mark Nord, U.S. Dep't Of Agric., Economic Research Service, Food Insecurity Among Households with Working-Age Adults with Disabilities, at 15 (2013), https://www.ers.usda.gov/webdocs/publications/45038/34589_err_144.pdf?v=41284. Individuals with other reported disabilities are individuals "who had a disability but did not indicate they were out of the labor force due to disability." For comparison, 12% of households with no disabled adult were food insecure. *Id.*

^{xiii} Matthew J. Breiding, Michele C. Black & Jieru Chen, Ctrs. for Disease Control & Prevention, Nat'l Ctr. for Inj. Prevention & Control, Intimate Partner Violence in the United States — 2010, at 34 (2014), available at https://www.cdc.gov/violenceprevention/pdf/cdc_nisvs_ipv_report_2013_v17_single_a.pdf.

^{xiv} Alisha Coleman-Jensen et al., U.S. Dep't of Agric., Household Food Insecurity in the United States in 2018, at 9 (2019), <https://www.ers.usda.gov/webdocs/publications/94849/err-270.pdf?v=963>.

^{xv} *Id.* at 14.

^{xvi} CHILD CARE AWARE OF AMERICA, THE US AND THE HIGH COST OF CHILD CARE: APPENDICES (Oct. 2018), available at <http://usa.childcareaware.org/wp-content/uploads/2018/10/appendices18.pdf>.

^{xvii} KATHRYN LARIN ET AL., U.S. GOV'T ACCOUNTABILITY OFFICE, CHILD CARE AND DEVELOPMENT FUND: SUBSIDY RECEIPT AND PLANS FOR NEW FUNDS, (2019), available at <https://www.gao.gov/assets/700/696930.pdf>.

^{xviii} <https://www.urban.org/research/publication/unintended-consequences-snap-asset-limits>

^{xix} Nat'l Women's Law Center calculations based on U.S. Census Bureau, 2017 American Community Survey using IPUMS.



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^{xx} See generally Nat'l Women's Law Ctr., Collateral Damage: Scheduling Challenges for Workers in Low-Wage Jobs and Their Consequences (Apr. 2017), available at <https://nwlc-ciw49tixgw5lbab.stackpathdns.com/wp-content/uploads/2017/04/Collateral-Damage.pdf>.

^{xxi} NWLC calculations based on U.S. Census Bureau, 2017 American Community Survey using IPUMS.

^{xxii} Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP), 84 Fed. Reg. 35,570, 35,575 (proposed July 24, 2019) (to be codified at 7 C.F.R. part 273). USDA estimates that about 1.4 million individuals currently receiving SNAP are in households with assets above the SNAP limit and about 1.7 million participants are in households with gross incomes above the SNAP limit. *Id.* at 35,571-72.

^{xxiii} NWLC calculations based on U.S. Census Bureau, 2017 American Community Survey using IPUMS.

^{xxiv} JASMINE TUCKER & KAYLA PATRICK, NWLC, LOW-WAGE JOBS ARE WOMEN'S JOBS: THE OVERREPRESENTATION OF WOMEN IN LOW-WAGE WORK (Aug. 2017), available at <https://nwlc-ciw49tixgw5lbab.stackpathdns.com/wp-content/uploads/2017/08/Low-Wage-Jobs-are-Womens-Jobs.pdf>.

^{xxv} *Id.*

^{xxvi} *Id.*

^{xxvii} Nat'l Women's Law Ctr. Underpaid & Overloaded: Women in Low-Wage Jobs (2014), available at https://www.nwlc.org/sites/default/files/pdfs/final_nwlc_lowwagereport2014.pdf.

^{xxviii} See generally JULIE VOGTMAN & KAREN SCHULMAN, NWLC, SET UP TO FAIL: WHEN LOW-WAGE WORK JEOPARDIZES PARENTS' AND CHILDREN'S SUCCESS (Jan. 2016), available at <https://nwlc.org/wp-content/uploads/2016/01/Final-Set-Up-To-Fail-When-Low-Wage-Work-Jeopardizes-Parents%E2%80%99-and-Children%E2%80%99s-Success.pdf>.

^{xxix} *Id.*

^{xxx} NAT'L WOMEN'S LAW CTR., SEXUAL HARASSMENT IN THE WORKPLACE (Nov. 2016), available at <https://nwlc-ciw49tixgw5lbab.stackpathdns.com/wp-content/uploads/2016/11/Sexual-Harassment-Fact-Sheet.pdf>.

^{xxxi} See, e.g., Eleanor Lyon, Nat'l Res. Ctr. on Domestic Violence, Welfare, Poverty and Abused Women: New Research and its Implications (Oct. 2000), available at https://vawnet.org/sites/default/files/materials/files/2016-09/BCS10_POV.pdf; Mary Kay, Inc., 2012 Mary Kay Truth About Abuse Survey Report (2012), available at http://content2.marykaintouch.com/public/PWS_US/PDFs/company/2012Survey.pdf; Eleanor Lyon, Shannon Lane & Anne Menard, Meeting Survivors' Needs: A multistate study of domestic violence shelter experiences (Oct. 2008), available at http://www.vawnet.org/Assoc_Files_VAWnet/MeetingSurvivorsNeeds-FullReport.pdf; Eleanor Lyon, Jill Bradshaw & Anne Menard, Meeting Survivors' Needs through Non-Residential Domestic Violence Services & Supports: Results of a Multi-State Study (Nov. 2011), available at <https://vawnet.org/sites/default/files/materials/files/2016-07/DVServicesStudy-FINALReport2011.pdf>; Rachel Kimerling et al., Unemployment Among Women: Examining the Relationship of Physical and Psychological Intimate Partner Violence and Posttraumatic Stress Disorder, 24 J. Interpersonal Violence 450 (2009).

^{xxxii} See, e.g., Judy Postmus et al., Understanding Economic Abuse in the Lives of Survivors, 27 J. Interpersonal Violence 411 (2011), available at

<https://journals.sagepub.com/doi/abs/10.1177/0886260511421669>; Adrienne Adams et al., Development of the Scale of Economic Abuse, 13 Violence Against Women 563-588 (2008), available at <https://vaw.msu.edu/wp-content/uploads/2013/10/Scale-of-Economic-Abuse.pdf>; Inst. For Women's Pol'y Res., The Economic Cost of Intimate Partner Violence, Sexual Assault, and Stalking (Aug. 2017), available at https://iwpr.org/wp-content/uploads/2017/08/B367_Economic-Impacts-of-IPV-08.14.17.pdf.

^{xxxiii} See, e.g., Inst. For Women's Pol'y Res., *supra* note 26.

^{xxxiv} See, e.g., Kaiser Family Foundation, Poverty Rate by Race/Ethnicity (2016), <https://www.kff.org/other/state-indicator/poverty-rate-by-raceethnicity>; National Poverty Center (2009). Policy Brief – The Colors of Poverty: Why Racial and Ethnic Disparities Persist, available at http://npc.umich.edu/publications/policy_briefs/brief16/PolicyBrief16.pdf; Badgett et al., New Patterns of Poverty in the Lesbian, Gay, and Bisexual Community (2013), available at <http://williamsinstitute.law.ucla.edu/wp-content/uploads/LGB-Poverty-Update-Jun-2013.pdf>; Albelda et al., Poverty in the Lesbian, Gay, and Bisexual Community (2009), <http://williamsinstitute.law.ucla.edu/wp-content/uploads/Albelda-Badgett-Schneebaum-Gates-LGB-Poverty-Report-March-2009.pdf>; Bread for the World, Hunger and Poverty Among Immigrants (2016), available at <http://www.bread.org/sites/default/files/downloads/immigrants-fact-sheet-2016.pdf>; Vallas, R. & Fremstad, S., Disability is a Cause and Consequence of Poverty (2014), <https://talkpoverty.org/2014/09/19/disability-cause-consequence-poverty/>.

^{xxxv} See, e.g., Eleanor Lyon, Nat'l Res. Ctr. on Domestic Violence, Welfare, Poverty and Abused Women: New Research and its Implications (2002), <https://vawnet.org/material/welfare-poverty-and-abused-women-new-research-and-its-implications>.

^{xxxvi} Lyon, Lane & Menard, *supra* note 25; Lyon, Bradshaw & Menard, *supra* note 25; Kimerling et al., *supra* note 25.

^{xxxvii} Shaina Goodman, Nat'l Res. Ctr. on Domestic Violence, The Difference Between Surviving and Not Surviving: Public Benefits Programs and Domestic and Sexual Violence Victims' Economic Security 3 (Jan. 2018), https://vawnet.org/sites/default/files/assets/files/2018-10/NRCDV-TheDifferenceBetweenSurvivingandNotSurviving-UpdatedOct2018_0.pdf.

^{xxxviii} SHAINA GOODMAN, NRC DV, "THE DIFFERENCE BETWEEN SURVIVING AND NOT SURVIVING": PUBLIC BENEFITS PROGRAMS AND DOMESTIC AND SEXUAL VIOLENCE VICTIMS' ECONOMIC SECURITY, (Jan. 2018), available at

https://vawnet.org/sites/default/files/assets/files/2018-01/TheDifferenceBetweenSurvivingandNotSurviving_Jan2018.pdf.

^{xxxix} Niolon, Kearns, Dills, et al., Center for Disease Control and Prevention, *Preventing intimate partner violence across the lifespan: a technical package of programs, policies, and practices* (2017), available at <https://www.cdc.gov/violenceprevention/pdf/ipv-technicalpackages.pdf>.

^{xl} Id.

^{xli} Shaina Goodman, *Difference Between Surviving and Not Surviving* (2018), available at https://vawnet.org/sites/default/files/assets/files/2018-10/NRCDV-TheDifferenceBetweenSurvivingandNotSurviving-UpdatedOct2018_0.pdf.

^{xliii} Id.



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