



February 11, 2026

Dear Commissioner Bisignano,

The National Down Syndrome Congress (NDSC), along with the undersigned national, state, and local Down syndrome organizations, urges the Social Security Administration (SSA) not to remove the Supplemental Nutrition Assistance Program (SNAP) as a qualifying form of public assistance when determining whether a household qualifies as a “public assistance (PA) household” for Supplemental Security Income (SSI) purposes—particularly when one household member receives SSI and another receives SNAP.

NDSC is the nation’s oldest national organization representing people with Down syndrome, their families, and the professionals who support them. We advocate for policies that protect the dignity, independence, and economic security of people with Down syndrome and other intellectual and developmental disabilities.

In 2024, SSA finalized an important rule modernizing the PA household definition by adding SNAP as a qualifying benefit and allowing households to qualify if **any** member receives public assistance. This update reduced the harmful effects of in-kind support and maintenance (ISM) rules and better reflected how families actually live. SSA estimated the change increased benefits for nearly 300,000 SSI recipients and expanded or restored eligibility for more than 100,000 individuals.

We are deeply concerned by proposals to reverse this policy and return to the pre-2024 standard requiring all household members to receive public assistance. Under such a rollback, SNAP would no longer count toward PA household status, causing many families—especially those supporting a disabled adult or older relative on SSI—to lose eligibility or face significant benefit reductions. These cuts would disproportionately harm households already living in poverty. SSI serves approximately 7.5 million low-income seniors and people with disabilities, with strict asset limits and a maximum federal benefit of just \$994 per month. For many people with Down syndrome, SSI is their sole source of income. Removing SNAP from PA household determinations would subject many recipients to the one-third ISM reduction, even when families are simply helping with food or shelter.

This change would reverse recent gains nationwide. For example, an adult with Down syndrome living with low-income parents who receive SNAP currently qualifies for the full SSI benefit. Under a rollback, her benefit could be reduced by roughly one-third due to ISM penalties—pushing her deeper into poverty and increasing the risk of housing instability or

institutionalization. Beyond direct financial harm, rescinding the 2024 definition would increase reporting burdens, add complexity to already confusing ISM rules, and heighten the risk of benefit errors and clawbacks—especially amid SSA staffing challenges. It would also discourage families from providing support and compound institutionalization risks as states face pressure to cut Medicaid home-and community-based services.

We appreciate SSA’s recent efforts to modernize SSI rules and urge the agency to **retain SNAP as a qualifying public assistance benefit and preserve the 2024 PA household definition**. Doing so is essential to protecting SSI beneficiaries with Down syndrome and other disabilities from unnecessary benefit cuts, administrative burdens, and increased poverty.

Thank you for your consideration. We welcome the opportunity to discuss this issue further.

Sincerely,

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NATIONAL ORGANIZATIONS

Global Down Syndrome Foundation
National Down Syndrome Congress
National Down Syndrome Society

STATE & LOCAL ORGANIZATIONS

ALASKA

Alaska Down Syndrome Network

ARIZONA

Down syndrome Network of Arizona

ARKANSAS

Down Syndrome Connection of Northwest Arkansas

CALIFORNIA

California Down Syndrome Advocacy Coalition
Club 21 Learning & Resource Center
Down Syndrome Association of Orange County
Kern Down Syndrome Network

CONNECTICUT

Down Syndrome Association of Connecticut

DELAWARE

Down Syndrome Association of Delaware

FLORIDA

Gold Coast Down Syndrome Organization

SMILE with Stella Down Syndrome Clinic

ILLINOIS

Gateway Down Syndrome Association

Supporting Illinois Brothers and Sisters (S.I.B.S.)

KANSAS

Targeted Case Management of Kansas, LLC

LOUISIANA

Down Syndrome Association of Greater New Orleans

MARYLAND

Blessed with Extraordinary

Maryland Down Syndrome Advocacy Coalition

Parents of Children with Down syndrome (PODS) of Prince George's Co.

MASSACHUSETTS

Massachusetts Down Syndrome Congress

MICHIGAN

Down Syndrome Association of West Michigan

MINNESOTA

Down Syndrome Association of Minnesota

MISSISSIPPI

Pine Belt Down Syndrome Outreach

MISSOURI

Gateway Down Syndrome Association
The Farmer's House

NEBRASKA

Down Syndrome Alliance of the Midlands
Down Syndrome Association for Families of Nebraska

NEW MEXICO

Rio Grande Down Syndrome Network

NORTH DAKOTA

Designer Genes of North Dakota

PENNSYLVANIA

Down Syndrome Association of Pittsburgh
Pennsylvania Down Syndrome Advocacy Coalition (PDSAC)

SOUTH DAKOTA

The McGovern Center for Leadership and Public Service
Ups of Downs Family Support Group

TENNESSEE

Down Syndrome Association of Middle Tennessee (DSAMT)
Down Syndrome Association of Memphis & the Mid-South

TEXAS

Down Syndrome Association of Central Texas
Down Syndrome Association of Houston
Down Syndrome Guild of Dallas
Rio Grande Valley Down Syndrome Association

WISCONSIN

Down syndrome Association of Wisconsin