



March 26, 2018

Mr. Len Wolfson
Assistant Secretary for Congressional and Intergovernmental Relations
U.S. Department of Housing and Urban Development

Dear Mr. Wolfson:

We write to you on behalf of the National Association of State Treasurers (NAST) to bring to your attention a newly passed resolution regarding the treatment of ABLE funds in determining eligibility for federal housing programs.

President
Beth Pearce, VT

Executive Committee
David Damschen, UT
Duane Davidson, WA
Deborah Goldberg, MA
Curtis Loftis, SC
Seth Magaziner, RI
Ken Miller, OK
Don Stenberg, NE

Executive Director
Shaun Snyder

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Enacted by Congress in 2014 with nearly unanimous bipartisan support, the Achieving a Better Life Experience (ABLE) Act established a critical tool for Americans with disabilities to plan and save for disability-related expenses. A critical component of ABLE accounts is that beneficiaries can grow these accounts without jeopardizing their access to federal means-tested benefits. This concept is included both in the statute and reaffirmed in subsequent guidance released by federal agencies such as the Social Security Administration and the Centers for Medicare and Medicaid Services.

Specifically, NAST respectfully requests the promulgation of rules or the development of guidance to ensure funds in ABLE accounts are disregarded when determining eligibility for federal housing programs administered by HUD. It has come to the attention of ABLE administrators that beneficiaries of these accounts have experienced inconsistent treatment related to their eligibility for federal housing programs such as the Housing Choice Vouchers Program. This change will provide needed clarity to Americans with disabilities and their families as they make financial decisions.

State Treasurers and other ABLE Administrators are the primary officials who are responsible for managing the ABLE plans in their respective states. Their membership in the NAST ABLE Committee makes our organization an important resource for the administration of ABLE programs and the continued improvement of the plans by Congress and federal regulators.

This important change will benefit existing ABLE beneficiaries and encourage even more to open accounts and save. We appreciate your consideration of the enclosed resolution and look forward to working with you and your staff to establish policies that allow Americans with disabilities to manage their finances and plan for the future. Please feel free to contact me if you have any questions or would like to discuss this issue further.

Sincerely,

A handwritten signature in blue ink that reads "Shaun Snyder".

Shaun Snyder
Executive Director
National Association of State Treasurers

A handwritten signature in black ink that reads "Elizabeth Pearce".

Beth Pearce
President, NAST &
Vermont State Treasurer