



September 23, 2019

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

RE: Docket No. FNS–2018–0037, Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program

On behalf of Meals on Wheels America, the national nonprofit organization representing the network of thousands of community-based senior nutrition programs across the country and the individuals they serve, I am writing to express our opposition to the Food and Nutrition Service's (FNS) proposed rule to limit eligibility for the Supplemental Nutrition Assistance Program (SNAP) through Broad-Based Categorical Eligibility (BBCE), and urge FNS to withdraw the proposal. This rule would harm the health, well-being and financial security of millions of vulnerable individuals, many of them seniors, who depend on SNAP to put food on the table in times of need and stretch limited financial resources.

As the older adult population grows rapidly each year, hunger and poverty remain persistent challenges for our nation's seniors. Nearly 9.5 million adults age 60 and older face the threat of hunger – among those, 5.5 million, or 7.7 percent, were *food insecure* or *very low food secure* – and 7 million, or 10 percent, live in poverty.<sup>1, 2</sup> SNAP is the largest federal nutrition program and thus plays a key role in addressing the unique health and social needs of low income, older adults. Over the years, this program has provided monthly benefits to an increasing number of households with seniors – about 5 million in 2017 – to use toward purchasing food they would otherwise be unable to afford.<sup>3</sup> Additionally, the program provides nutritional support to family members and caregivers of older adults who may be struggling to meet their own basic needs while also providing vital care to seniors in their homes and communities.

The changes proposed in this rule would result in the loss of SNAP benefits for an estimated 1.7 million households in Fiscal Year 2020 alone. Participants ages 60 and older would be disproportionately affected by the revisions to BBCE. An estimated 13.2% of households with one or more elderly members is likely to be affected by the rule. This translates to at least 660,000 low-income seniors becoming ineligible for their monthly SNAP benefits, immediately and negatively impacting the health, nutrition and economic security of millions of older adults and their family members who they depend on for care and financial assistance.

SNAP is a critical program that provides access to food not just for millions of participating seniors, but also for low-income children, adults and families who need adequate nutrition through all stages of life to help pave the way for healthy aging. Connecting those individuals who are experiencing food insecurity, poverty or any other form of economic instability to SNAP is necessary for safeguarding an individual's health and well-being during times of need and as he or she ages. Research shows that SNAP participation is associated with improved food security, dietary intake and health with lasting effects.<sup>4, 5, 6</sup> SNAP also contributes to the health

and independence of seniors, a particularly important factor for the more than 4 million elderly participants (82%) who live alone.<sup>3</sup> Among older adults, SNAP participation has been associated with improved medication adherence, as well as decreased rates of hospitalization and institutionalization, which in turn saves significantly in terms of reduced healthcare costs.<sup>7, 8, 9</sup> Not only does SNAP provide seniors and their families the means for reliable and consistent nutrient intake, which has a direct effect on health status of participants, but the receipt of their monthly benefits also alleviates the burden of choosing between purchasing groceries or being able to afford rent, medication, heat and other monthly expenses.

In addition to disqualifying millions of individuals from the benefits on which they rely, we are concerned that this rulemaking also disregards Congressional intent. Both the U.S. House of Representatives and Senate overwhelmingly rejected proposals to limit SNAP eligibility through BBCE last year. The bipartisan Agricultural Improvement Act of 2018 was passed with wide margins in both chambers, and it reauthorized SNAP without controversial provisions that weaken states' flexibility through BBCE and restrict eligibility for participants who benefit from categorical eligibility. Contrary to its goal of closing administrative "loopholes" and promoting "self-sufficiency" among beneficiaries, the reality is that this rule, as proposed, will actually do more to harm the health and well-being of the impacted population and result in increased administrative and healthcare expenditures.

At this time, we should be supporting and investing in programs, like SNAP, that promote better health outcomes and financial security for our nation's most vulnerable seniors. Instead, this rule seeks to further restrict access to food assistance that serves as a lifeline for many. As this rule will undoubtedly contribute to the widespread food and financial insecurity experienced by millions of seniors and their families, we strongly oppose it and urge that it be withdrawn from consideration at this time.

Sincerely,

A handwritten signature in blue ink that reads "Ellie Hollander". The signature is written in a cursive, flowing style.

Ellie Hollander  
President and CEO

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- <sup>1</sup> Ziliak & Gunderson, *The State of Senior Hunger in America 2017*, May 2019, <https://www.feedingamerica.org/research/senior-hunger-research/senior>
- <sup>2</sup> Administration for Community Living, Aging Integrated Database (AGID), Data Source: *US Census Bureau American Community Survey (ACS), Demographic Data 2017*, <https://agid.acl.gov/>
- <sup>3</sup> U.S. Department of Agriculture (USDA), *Characteristics of Supplemental Nutrition Assistance Program Households: Fiscal Year 2017*, February 2019, <https://fns-prod.azureedge.net/sites/default/files/ops/Characteristics2017.pdf>
- <sup>4</sup> Mabli & Ohls, "Supplemental Nutrition Assistance Program participation is associated with an increase in household food security in a national evaluation," *Journal of Nutrition* 145(2), 2015, <https://www.ncbi.nlm.nih.gov/pubmed/25644357>
- <sup>5</sup> Nguyen et al., "The Supplemental Nutrition Assistance Program, Food Insecurity, Dietary Quality, and Obesity Among U.S. Adults," *American Journal of Public Health* 105(7), 2015, <https://www.ncbi.nlm.nih.gov/pubmed/25973830>
- <sup>6</sup> Berkowitz et al., "Supplemental Nutrition Assistance Program (SNAP) Participation and Health Care Expenditures Among Low-Income Adults," *JAMA Internal Medicine* 177(11), 2017, <https://www.ncbi.nlm.nih.gov/pubmed/28973507>
- <sup>7</sup> Srinivasan & Pooler, "Cost-Related Medication Nonadherence for Older Adults Participating in SNAP, 2013-2015," *American Journal of Public Health* 108(2), 2018, <https://www.ncbi.nlm.nih.gov/pubmed/29267062>
- <sup>8</sup> Samuel et al., "Does the Supplemental Nutrition Assistance Program Affect Hospital Utilization Among Older Adults? The Case of Maryland," *Population Health Management* 21(2), 2018, <https://www.ncbi.nlm.nih.gov/pubmed/28683219>
- <sup>9</sup> Szanton et al., "Food assistance is associated with decreased nursing home admissions for Maryland's dually eligible older adults," *BMC Geriatrics* 17(1), 2017, <https://www.ncbi.nlm.nih.gov/pubmed/28738897>