



April 2, 2019

Certification Policy Branch  
SNAP Program Development Division  
Food and Nutrition Service, USDA  
3101 Park Center Drive  
Alexandria, Virginia 22302

RE: Proposed Rule: Supplemental Nutrition Assistance Program: Requirements for Able-Bodied Adults without Dependents RIN 0584-AE57

Dear Certification Policy Branch:

On behalf of Meals on Wheels America, the national nonprofit organization representing the network of thousands of community-based senior nutrition programs and the millions of individuals they serve nationwide, I am writing to express our opposition to the U.S. Department of Agriculture's (USDA) proposed rulemaking on Supplemental Nutrition Assistance Program (SNAP) requirements and services for able-bodied adults without dependents (ABAWDs). This proposed rule would harm thousands of vulnerable individuals by denying them access to SNAP benefits at a time when they may be struggling with food insecurity and/or other financial hardships.

As stated in the proposed rule, these policy changes would result in an estimated 755,000 low-income adults losing eligibility to receive SNAP benefits in the next fiscal year and cut benefits by billions of dollars over the next five years. Although this rule directly targets a non-senior population, it would nonetheless negatively impact the health, nutrition, and economic security of older adults and the family members that many seniors depend on for care and financial assistance. SNAP is a critical program that puts food on the table not just for millions of participating seniors, but also for low-income adults of all ages who need adequate nutrition through all stages of life to help pave the way for healthy aging.

With nearly nine million seniors facing the threat of hunger, a robust and accessible national nutrition program is necessary.<sup>1</sup> SNAP is the largest federal nutrition program, providing food assistance to over four million seniors alone, and is therefore a critical component of our national anti-hunger safety net.<sup>2</sup> For older adults, utilization of SNAP supports health and independence, and alleviates the burden of choosing whether to forgo food so that they can pay for rent, medicine, or other expenses.<sup>3</sup> Furthermore, this program provides additional security to our nation's older adults by providing nutritional support to family members and/or caregivers, who may also be struggling to meet their own basic needs while also providing vital care to seniors in their homes and communities.

Good health and economic security earlier in life are directly related to those outcomes later in life. Connecting individuals to SNAP – especially those who are experiencing food insecurity, poverty, or any other form of economic instability – is critical for safeguarding an individual's health and wellbeing during times of need and as he/she ages. Research shows that SNAP participation is associated with improved food security, dietary intake, and health with lasting

effects.<sup>4-7</sup> This rule would eliminate SNAP benefits for thousands of low-income adults, thereby challenging their ability to age in healthy ways.

In addition to restricting food assistance to thousands of individuals and families, this proposed rule seeks to fully disregard the intent of Congress. Both the U.S. House of Representatives and Senate overwhelmingly rejected proposals last year to impose stricter work requirements on ABAWDs receiving SNAP benefits. The Agricultural Improvement Act of 2018 passed with wide margins in both chambers, and it reauthorized SNAP without controversial or ineffective policies that weaken states' flexibility through waivers and reduce the time limits for eligibility. As proposed, these policies will not improve health or employment prospects among the impacted population, and are therefore contrary to the rule's purpose to promote "self-sufficiency."<sup>8</sup>

As a country, we should be supporting and investing in versus cutting and limiting access to, programs that promote better health outcomes and financial security for all individuals, regardless of age or socioeconomic status. Rather than helping to alleviate the hunger crisis that unrelentingly affects this nation – as SNAP has done – this proposal will contribute to the widespread food and financial insecurity experienced by millions. As such, we respectfully ask that this rule be withdrawn at this time.

Sincerely,



Ellie Hollander  
President and CEO

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- <sup>1</sup> Ziliak & Gundersen, *The State of Senior Hunger 2016*, a report prepared for Feeding America and National Foundation to End Senior Hunger (Chicago, IL: Feeding America, May 2018), available at <https://www.feedingamerica.org/sites/default/files/research/senior-hunger-research/state-of-senior-hunger-2016.pdf>
  - <sup>2</sup> Cunnyngham, *Trends in Supplemental Nutrition Assistance Program Participation Rates: Fiscal Year 2010 to Fiscal Year 2016* (Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service, July 2018), available at <https://fns-prod.azureedge.net/sites/default/files/snap/Trends2010-2016.pdf>
  - <sup>3</sup> Food Research & Action Center (FRAC), *A Primer: SNAP's Importance in Supporting Seniors Struggling against Hunger in the U.S.* (Washington, DC: FRAC, March 2018), available at <http://frac.org/wp-content/uploads/senior-snap-map-primer.pdf>
  - <sup>4</sup> Mabli & Ohls, *Supplemental Nutrition Assistance Program participation is associated with an increase in household food security in national evaluation*. *Journal of Nutrition* (Vol. 145(2):344-51; February 2015), abstract available at <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* (Vol. 105(7):1453-9; July 2015), abstract available at <https://www.ncbi.nlm.nih.gov/pubmed/25973830>
  - <sup>6</sup> Berkowitz, Seligman & Sanjay, *Impact of Food Insecurity and SNAP Participation on Healthcare Utilization and Expenditures*, a University of Kentucky Center for Poverty Research Discussion Paper Series (Lexington, KY: University of Kentucky, 2017), available at [https://uknowledge.uky.edu/ukcpr\\_papers/103/](https://uknowledge.uky.edu/ukcpr_papers/103/)

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- <sup>7</sup> Berkowitz et al., *Supplemental Nutrition Assistance Program (SNAP) participation and health care expenditures among low-income adults*. JAMA Internal Medicine (Vol. 177(11):1642-9; November 2017), abstract available at <https://www.ncbi.nlm.nih.gov/pubmed/28973507>
- <sup>8</sup> Grant et al., *Unworkable & Unwise: Conditioning Access to Programs that Ensure a Basic Foundation for Families on Work Requirements* (Washington, DC: Georgetown Center on Poverty and Inequality, Georgetown University Law School, February 2019), available at <http://www.georgetownpoverty.org/wp-content/uploads/2019/02/Unworkable-Unwise-GCPI-ESOI.pdf>