

Senior Services Coalition of Alameda County

AGING IS SOMETHING WE ALL HAVE IN COMMON

August 26, 2019

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

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:

On behalf of the Senior Services Coalition of Alameda County (SSC), I appreciate the opportunity to comment on USDA's Notice of Proposed Rule Making on a Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP), known as CalFresh in California.

Across California, 4.7 million adults and 2.0 million children live in low-income households affected by food insecurity.¹ Food insecurity means having limited, uncertain, or inconsistent access to the quality and quantity of food that is necessary to live a healthy life. Having sustained access to enough food is tied to positive social, physical, and mental health outcomes.

SSC is a coalition of 40 nonprofit and public organizations that provide community-based health and social services to over 79,000 older adults in Alameda County. Our mission is to strengthen and improve the network of support for older people in Alameda County, especially those disproportionately impacted and at risk because of fragile health, cognitive impairment, disability, language, culture, race or financial status.

Our coalition and its members pay close attention to SNAP/CalFresh because the program plays a critical role in addressing hunger and food insecurity in our community and is the first line of defense against hunger for senior citizens struggling to get by with limited means.

We are deeply concerned that the Administration is proposing to take away a state option that would make eligibility for SNAP benefits more restrictive for senior citizens in more than 40 states, including California. The proposed regulation would eliminate SNAP eligibility for households with individuals over age 60 who have more than \$3,500 in liquid savings. We strongly oppose such a change and recommend that the Administration withdraw its proposed change to this policy.

¹ CFPA Factsheet, "*Struggling to Make Ends Meet: Food Insecurity in CA*," available at <https://cfpa.net/GeneralNutrition/CFPAPublications/FoodInsecurity-Factsheet-2019.pdf>

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 to lift SNAP's very low asset tests, which disqualify families and individuals from food assistance if they have managed to save as little as \$2,250 (or \$3,500 for households with elderly or disabled members, who are very unlikely to be able to replenish any assets they spend down.) The federal rules also count the value of cars worth more than \$4,650 toward the asset test. By using the option, states can open SNAP eligibility to seniors with income that qualifies them for SNAP, but who would otherwise be ineligible because they have managed to build modest savings above the restrictive federal limit or own a reliable car. Seniors in California can receive SNAP benefits to purchase groceries without having to spend down their limited savings. This allows them to maintain a cushion that can help them weather future financial emergencies.

The cut falls disproportionately on households with seniors. More than 600,000 SNAP households with members over age 60 (some 13.2 percent of all SNAP households with seniors) would be cut from SNAP food assistance, according to USDA's estimates of the effect of the proposed rule. This represents more than one-third of the 1.7 million households the Administration estimates would lose SNAP. Our colleagues at California Food Policy Advocates estimate that 230,000 or more low-income Californians would lose access to CalFresh,² and that large share of them will be older adults over age 60.

Some 71 million people in the United States are age 60 and older. Many live on fixed incomes and have limited financial means to afford expenses such as food, medical, or housing costs. Many have disabilities or take care of children. Unfortunately, food insecurity among seniors is all too common a problem. In 2017, 30 percent of all U.S. households included individuals aged 65 and older. Of this group, 7.9 percent (3 million) were food insecure, meaning that these households had difficulty affording nutritious, adequate food. This share remains higher than it was before the recession, in 2007, when 6.5 percent (1.8 million) of these households were food insecure.

Research – and the experience of our member organizations – indicates that food-insecure seniors have less nutritious diets, have worse health outcomes, and are at higher risk for depression than food-secure seniors. Compared to other adult age groups, seniors are particularly vulnerable to the health consequences of food insecurity. Households with grandchildren are almost three times as likely to be food insecure. SNAP benefits help to alleviate these adverse conditions. For these seniors, the Supplemental Nutrition Assistance Program (SNAP) plays an important role. While it provides a modest benefit, just \$125 a month on average for households with members age 60 or older, it enables them to meet their basic food needs.

Categorical Eligibility works for California, especially for seniors. It helps them make financially responsible choices like establishing modest savings while still being able to afford a healthy

² Estimate based on 6.2 percent of CalFresh caseload, from Senate Appropriations Analysis of 2013 AB 191 (Fuentes) available at: http://leginfo.legislature.ca.gov/faces/billAnalysisClient.xhtml?bill_id=201320140AB191

diet. It also increases administrative efficiency by streamlining enrollment into SNAP/CalFresh. It is more important now than ever to support seniors enrolling in CalFresh, as over 500,000 SSI recipients recently became eligible for CalFresh, many of whom are seniors. These low-income households have waited decades for CalFresh eligibility, and new limitations to program eligibility now would further erode opportunities to access CalFresh to help them make ends meet.

We strongly oppose any administrative action by USDA that would reduce states' flexibility to extend SNAP eligibility to low income seniors. Any change that would restrict, impede, or add uncertainty to our state's ability to provide SNAP benefits to our low-income senior population must not be pursued.

The only action we encourage USDA to take with respect to this option is to encourage more states to adopt it. Extending SNAP's ability to provide food assistance to households with low income seniors would be a powerful policy improvement that would reduce food insecurity among this vulnerable group.

We strongly oppose the proposed rule that would cut food benefits for struggling seniors and harm our community, and strongly urge USDA to immediately withdraw this misguided proposal.

Sincerely,

A handwritten signature in black ink that reads "Wendy Peterson". The signature is written in a cursive, flowing style.

Wendy Peterson
Director, Senior Services Coalition of Alameda County