

September 16, 2019 Advocacy Alert



More Than 620,000 Older Adults May Lose Nutrition Benefits Under Proposed Rule Use n4a Template Letter to Respond to SNAP Changes

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A rule change proposed by the U.S. Department of Agriculture's (USDA) Food and Nutrition Service (FNS) would transform the way that many states assess eligibility for the Supplemental Nutrition Assistance Program (SNAP) and could eliminate eligibility for three million current participants, including an estimated 620,000 older adults.

Overview

The FNS proposal makes changes to the process that many states use to determine SNAP eligibility—known as Broad Based Categorical Eligibility (BBCE)—to significantly restrict reciprocal eligibility for multiple income-support programs. Currently, states may confer SNAP eligibility if an individual or household qualifies for benefits from the Temporary Assistance for Needy Families (TANF) program. BBCE is a streamlined determination process that reduces the administrative burden of more than 40 state agencies and ensures that vulnerable individuals, including millions of older adults, receive access to SNAP benefits to reduce food insecurity and improve health.

According to USDA's own estimates, more than 13 percent of all SNAP households with older adults will lose benefits under the proposed rule. This means that of the approximately 4.7 million older adults currently enrolled in SNAP, a minimum of 620,000 could lose benefits that help them fulfill basic nutritional needs—resulting in a higher risk for negative health outcomes and increased medical costs. The 620,000 older adults who risk losing SNAP benefits under the proposed rule will also have more difficulty maintaining a basic standard of living as they may be forced to choose between paying for food, medicine, rent, utilities, transportation and other necessities. (See how your state would be [affected](#).)

Take Action

[n4a plans to comment on these proposed changes](#), and we encourage others in the Aging Network to do the same by submitting comments highlighting the implications that this proposed rule could have on older adults in your communities. Here are several ways you can weigh in.

1. **Put Your Agency on Record. Submit formal comments about what this change could mean for the older adults that you serve.** You can use [n4a's template letter](#) to comment online at <https://www.regulations.gov> (search for Docket No. FNS-2018-0037). Make sure to include any information that you can find about the implications this proposed change would have for older adults in your state, which you can learn about [here](#). Also consider incorporating individual stories about the importance of SNAP benefits to individuals in your community.
2. **Consider Submitting Individual Comments.** Even if your agency cannot comment, you can weigh in personally [online](#) and, if possible, encourage your advisory council members and other advocates to do the same.
3. **Contact Your Elected Officials.** Members of your congressional delegation should understand your concerns about the effects that this rule change would have on older adults in your community. If you submit a formal comment letter, make sure to send a copy to your Representative(s) and Senators. Even if your agency cannot formally comment, it is still a good idea to reach out to your legislators to voice your concerns.

Formal comments are due by midnight **Monday, September 23**. If your agency comments on this proposed change to SNAP, please send your submission to n4a as well. Contact n4a's policy team with questions or to share your feedback at policy@n4a.org.

Thank you for your advocacy on this important issue!

If you have questions or concerns about this *Advocacy Alert* or n4a's policy positions, please contact Autumn Campbell and Amy Gotwals at policy@n4a.org.