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**National Association of  
Area Agencies on Aging**

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

*Submitted electronically via <http://www.regulations.gov>*

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

Thank you for the opportunity to comment on the U.S. Department of Agriculture’s (USDA) Food and Nutrition Services (FNS) proposed rulemaking to revise Broad-Based Categorical Eligibility allowances under the Supplemental Nutrition Assistance Program (SNAP). On behalf of the National Association of Area Agencies on Aging (n4a), which represents the country’s 622 Area Agencies on Aging (AAAs) and serves as a voice in Washington, DC for the more than 250 Title VI Native American aging programs, **we are writing to urge the agency to reconsider and withdraw this proposed rulemaking.**

According to USDA’s own estimates, up to 620,000 older adults—13.2 percent of older SNAP beneficiaries—could lose access to vital nutrition supports if the proposed changes to state authority to make broad-based categorical SNAP eligibility determinations were restricted. We strongly oppose such a change and recommend that the Administration withdraw its proposed rule.

n4a’s members develop, coordinate and deliver local aging programs to help millions of older Americans and their caregivers get the support they need to age successfully at home and in their communities, and these programs and services are often targeted toward the most economically and medically vulnerable older adults in the country. Furthermore, the population that n4a’s members serve is growing at an historic rate. Every day, 10,000 boomers turn age 65, or nearly 10 million in the next three years. By 2030, 73 million—or one in five—people in America will be age 65 or older.

For many of the older adults and families that n4a members serve, access to nutrition benefits through SNAP is a critical link

to maintaining health and independence. Research indicates that food-insecure older Americans have less nutritious diets and have worse, and often more costly, health outcomes than food-secure seniors. Compared to other age groups, older adults are particularly vulnerable to the health consequences of food insecurity. Access to SNAP benefits help to alleviate these adverse conditions and can mean the difference between older adults having to choose between paying for food and other necessities such as medicine, housing, transportation and utilities.

Historically, Congress has established eligibility for SNAP benefits but allows states appropriate administrative leeway as they implement this vital program. For two decades, states have had the flexibility to adjust federally established SNAP asset tests to ensure that older adults with limited income are not disqualified for the program due to modest assets. Currently, more than 40 states use this flexibility.

The proposed rule change would disproportionately affect households with adults 60 and over. The USDA estimates that roughly one-third of the households losing SNAP eligibility include one or more older adults. Nationwide, of the 71 million people in the United States that are age 60 and older, many live on fixed incomes and have limited financial means to afford expenses such as food, medical and housing costs. Furthermore, food insecurity among older adults is a too-common challenge. In 2017, three million adults 65 and over were food insecure and had trouble obtaining nutritious and adequate food.

Nationally, SNAP serves a critical role in addressing hunger and food insecurity among older adults and is an essential resource to ensure that older adults get the nutrition they need to stay healthy and independent. We strongly oppose any administrative action that would reduce state flexibility to extend SNAP eligibility to low-income older adults. Any change that would restrict, impede or add uncertainty to any state's ability to provide SNAP benefits to this vulnerable population must be rejected, and we urge the Administration to withdraw this proposed rulemaking.

Thank you for the opportunity to share our experience and comment on the proposed changes to BBCE in SNAP. Please let us know if we can provide any additional information, on this or other community-based aging issues.

Sincerely,

A handwritten signature in cursive script that reads "Sandy Markwood". The signature is written in black ink and is positioned below the word "Sincerely,".

Sandy Markwood  
Chief Executive Officer