



May 13, 2016

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Food and Nutrition Services  
U.S. Department of Agriculture  
3101 Park Center Drive, Room 810  
Alexandria, VA 22302

*Submitted via [www.regulations.gov](http://www.regulations.gov)*

**Re: Supplemental Nutrition Assistance Program (SNAP) Promotion [FNS—2016—0028] RIN 0584—AE44**

Dear Ms. Conroy:

AARP is pleased to have the opportunity to comment on the proposed Supplemental Nutrition Assistance Program (SNAP) Promotion rule. AARP is a nonprofit, nonpartisan organization, with a membership of nearly 38 million, that helps people turn their goals and dreams into real possibilities, strengthens communities and fights for the issues that matter most to families such as healthcare, employment and income security, retirement planning, affordable utilities and protection from financial abuse.

AARP is deeply concerned with the issue of food insecurity, particularly the impact it has on the health of older adults. According to 2015 research from the AARP Foundation – the charitable arm of AARP serving the low-income age 50+ community including the food insecure – approximately 10 million adults over the age of 50 struggle with food insecurity.<sup>1</sup> AARP believes that SNAP is essential to eliminating hunger and improving health and wellness. SNAP also has a beneficial and stimulative effect on the economy.

**Outreach is an essential component of ensuring eligible older adults have access to and participate in SNAP, which reduces food insecurity, promotes health, and reduces health care costs.**

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<sup>1</sup> AARP Foundation, *Food Insecurity Among Older Adults 2015 Update*, [http://www.aarp.org/content/dam/aarp/aarp\\_foundation/2015-PDFs/AF-Food-Insecurity-2015Update-Final-Report.pdf](http://www.aarp.org/content/dam/aarp/aarp_foundation/2015-PDFs/AF-Food-Insecurity-2015Update-Final-Report.pdf)

For older adults, the negative consequences of food insecurity are dire; older adults struggling with food insecurity are over twice as likely to report being in poor health.<sup>2</sup> Compared to food-secure older adults, those facing food insecurity are 53 percent more likely to die of a heart attack, 40 percent more likely to have congestive heart failure, 22 percent more likely to face limitations of Activities of Daily Living, and are 60 percent more likely to suffer from depression.<sup>3</sup> Food insecurity among older adults represents significant costs to the American public, particularly through increased expenditures on health care. According to the Centers for Disease Control and Prevention, nearly 95 percent of health care costs for the 65+ population go towards treating and managing chronic illnesses, many of which are caused or exacerbated by food insecurity and poor nutrition.<sup>4</sup>

SNAP is the nation's largest federal domestic nutrition assistance program and provides 44.7 million Americans with critical support to purchase food for themselves and their families.<sup>5</sup> In Fiscal Year (FY) 2014, households with an individual over the age of 60 (which USDA classifies as "elderly") represented 19 percent of all SNAP households, with an average monthly benefit of \$129 per month. Eighty-two percent of elderly SNAP households were an elderly individual living alone.<sup>6</sup>

Despite the significant harm food insecurity causes older adults, and the proven track record SNAP has of reducing food insecurity, older adult participation rates in SNAP are the lowest of any age group. In FY 2013, 85 percent of all eligible individuals were enrolled in SNAP.<sup>7</sup> However, only 41 percent of eligible elderly individuals were enrolled in the program, including just 25 percent of elderly individuals living with other people.<sup>8</sup>

Many older adults do not participate in SNAP for a variety of reasons, including the lack of accurate information and/or misperceptions about the program. Many who are eligible feel that the dollar benefit available to them is insufficient to justify allocating time

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<sup>2</sup> Lee, JS., Frongillo Jr., Edward A. Nutritional and Health Consequences Are Associated with Food Insecurity among U.S. Elderly Persons. *J. Nutr.* May 1, 2001 vol. 131 no. 5 1503-1509.  
<http://jn.nutrition.org/content/131/5/1503.long>

<sup>3</sup> Feeding America. *Spotlight on Senior Health: Adverse Health Outcomes of Food Insecure Older Americans*. <http://www.feedingamerica.org/hunger-in-america/our-research/senior-hunger-research/or-spotlight-on-senior-health-executive-summary.pdf>

<sup>4</sup> U.S. Department of Health and Human Services, Centers for Disease Control. *The State of Aging & Health in America 2013*.  
[http://www.cdc.gov/features/agingandhealth/state\\_of\\_aging\\_and\\_health\\_in\\_america\\_2013.pdf](http://www.cdc.gov/features/agingandhealth/state_of_aging_and_health_in_america_2013.pdf)

<sup>5</sup> U.S. Department of Agriculture Food and Nutrition Service. Supplemental Nutrition Assistance Program: Number of Persons Participating.  
<http://www.fns.usda.gov/sites/default/files/pd/29SNAPcurrPP.pdf>

<sup>6</sup> U.S. Department of Agriculture Food and Nutrition Service. *Characteristics of Supplemental Nutrition Assistance Program Households: Fiscal Year 2014*.  
<http://www.fns.usda.gov/sites/default/files/ops/Characteristics2014.pdf>

<sup>7</sup> USDA-FNS, *Reaching Those in Need: Estimates of State Supplemental Nutrition Assistance Program Participation Rates in 2013*, 3 (August 2015), <http://www.fns.usda.gov/sites/default/files/ops/Trends2010-2013.pdf>

<sup>8</sup> *Id.* At p. 4

towards completing the application process.<sup>9 10</sup> As a result, it is essential that government and community organizations are able to disseminate accurate and detailed information to potentially SNAP eligible older adults, while making enrollment as seamless as possible. AARP appreciates and congratulates the Food and Nutrition Services (FNS) for including specific barriers older people face in their use of SNAP in their outreach examples, and encourages the agency to explore ways to improve the participation rate among older adults.

**AARP supports FNS’s fundamental strategy of maximizing both program access and program integrity.**

Overall, AARP believes the proposed rule does a good job of achieving a proper balance between the needs of potential recipients to receive objective, factual information about SNAP with an interest in ensuring against the possibility that public funds are expended on coercive or deceptive SNAP recruitment methods.<sup>11</sup> AARP commends FNS for emphasizing the distinction between the two and for providing guidance to States and grantees on how to provide outreach in a proper factual, informational and non-coercive manner.

**AARP opposes further restrictions around SNAP outreach.**

While we believe the proposed rule will not significantly alter or limit ongoing activities and proven best practices around informing and enrolling potentially SNAP eligible older adults, AARP opposes the imposition of any further restrictions around outreach that would create additional participation barriers and would prove harmful to this already vulnerable population’s ability to access SNAP benefits they are eligible to receive.

AARP appreciates the opportunity to comment on this proposed rule. If you have any questions, please do not hesitate to contact me or KJ Hertz on our Government Affairs staff at [khertz@aarp.org](mailto:khertz@aarp.org) or 202-434-3770.

Sincerely,



David M. Certner  
Legislative Counsel & Legislative Policy Director  
Government Affairs

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<sup>9</sup> AARP Foundation/Food Research and Action Center (FRAC). *Combatting Food Insecurity: Tools for Helping Older Americans Access SNAP*. 2014. [http://frac.org/pdf/senior\\_snap\\_toolkit\\_aarp\\_frac.pdf#page=7](http://frac.org/pdf/senior_snap_toolkit_aarp_frac.pdf#page=7)

<sup>10</sup> National Council on Aging. *Seniors & SNAP: Best Practices Handbook*. 2015. <https://www.ncoa.org/resources/seniors-snap-best-practices-handbook/>

<sup>11</sup> See 7 C.F.R. §277.4(b)(5)(i) (proposed).