



April 13, 2016

Kevin Concannon
Under Secretary
USDA Food and Nutrition Service
3101 Park Center Drive
Alexandria, VA 22302

Dear Under Secretary Concannon:

AARP is pleased to support the Elder Simplified Application Program (ESAP) waiver request that was filed by the Massachusetts Department of Transitional Assistance (DTA) with the USDA Food and Nutrition Service. AARP, with its nearly 38 million members in all 50 States and the District of Columbia, Puerto Rico, and U.S. Virgin Islands, is a nonpartisan, nonprofit, nationwide organization 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 about the issue of hunger and the more than ten million older adults struggling with food insecurity every day. This waiver will take several important steps to enhance elder access to SNAP benefits in Massachusetts and benefit the health and wellness of the senior population.

The MA DTA is requesting a waiver to reduce enrollment obstacles for deserving, already qualified SNAP applicants. The ESAP will allow eligible seniors to apply for SNAP through a shorter two-page document that includes electronic verification of demographic material, the elimination of the phone interview, the creation of a hotline for elder and disabled households, and plans for outreach to seniors and community organizations to implement the ESAP pilot. This waiver will help prevent elder malnutrition in MA, protecting seniors from negative health outcomes such as loss of muscle mass, fatal falls, and avoidable hospitalizations for other health problems.

The Massachusetts ESAP will do more than simplify the application process for deserving seniors. The pilot will also generate greater opportunities for collaboration with community-based organizations -- including the MA AARP state office -- to reach out to seniors who are eligible, but not currently receiving benefits, and ease medical expense information reporting, which is a common barrier to completing the application verification process. AARP appreciates the plans within the pilot to train DTA case workers on SNAP policies specific to the older and disabled population. Oftentimes, seniors have a difficult time getting through to agencies via telephone or mail in search of assistance with re-certification materials and other answers to inquiries. By training staff to answer questions

specific to older persons, beneficiaries will have more time to learn about nutritional decisions rather than navigating the benefit application.

Furthermore, the pilot will also add an extended 36-months recertification period for seniors without a form of income. Not only does this remove the burden of re-applying, but it also increases efficiency within the SNAP agencies. The extended re-certification period saves agency case workers an average of 30 minutes per application, reduces paperwork processing, and saves program administrative funding—funding that could be better used for new SNAP recipients, community outreach with partner organizations, and nutrition education programming.

AARP also supports this waiver's elimination of a common barrier to completing applications -- the logistics involved in coordinating an interview. In fact, lack of an interview is one of the largest contributors to "procedural denials" for otherwise eligible households. Requiring an *in-person* interview presents transportation and scheduling issues, especially if the individual is physically disabled. Likewise, a *phone* interview presents difficulties for older Americans who are hearing impaired, rarely answer their phones from unknown numbers, or cannot afford a telephone line. If an individual otherwise meets the criteria required for SNAP benefits, this waiver eliminates the interview as the sole factor as to why an individual cannot receive benefits.

However, we urge the USDA to provide additional guidance on transitioning ESAP households experiencing composition changes. About 7.8 million children across the country live in households headed by grandparents or other relatives.¹ Given that the Statutory Citation of Section 3(f) only states that "*all adult household members are elderly or disabled,*" the agency should clarify, for example, whether this would exempt, *de facto*, an elderly or disabled household that takes in a child from a longer recertification period. In particular, we urge you to review whether other states have developed systems to deal with similar transitions.

We are pleased to endorse the Massachusetts ESAP pilot, which we urge the USDA to promptly approve. If you have any further questions, please feel free to contact KJ Hertz on our Government Affairs staff at (202) 434-3732.

Sincerely,



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

cc: Audrey Rowe, Administrator, USDA Food and Nutrition; Jeff McCue, Commissioner, Massachusetts DTA

¹ The State of Grandfamilies in America: 2015, Generations United