



601 E Street, NW | Washington, DC 20049
202-434-2277 | 1-888-OUR-AARP | 1-888-687-2277 | TTY: 1-877-434-7598
www.aarp.org | twitter: @aarp | facebook.com/aarp | youtube.com/aarp

June 24, 2020

The Honorable Sonny Perdue
Secretary
U.S. Department of Agriculture
1400 Independence Ave., SW
Washington, D.C. 20250

Dear Secretary Perdue:

AARP, on behalf of our 38 million members and all older Americans nationwide, urges you to protect food security for older adults and suspend the Department's rulemaking process for the proposed rules entitled, Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP) and Supplemental Nutrition Assistance Program: Standardization of State Heating and Cooling Standard Utility Allowances. The pandemic and economic crisis has put low-income older adults in a more precarious situation. Now is not the time to move forward with rules that would eliminate SNAP eligibility and cut SNAP benefits for millions of people.

Even before the coronavirus pandemic, food insecurity among older Americans was already all too common. An estimated 9.8 million Americans age 50 and older were at risk for hunger in 2018, according to annual reports from Feeding America. Now, in the midst of the pandemic, we are seeing food insecurity worsen. One of the most common concerns our volunteers and state offices continue to report is that older Americans are struggling with hunger. As the pandemic wears on, food assistance programs continue to report skyrocketing demands. While the May Employment Situation data shows improvements in the labor market, the unemployment rate remains high, and for older workers, it often takes them longer to recover from a job loss. Additionally, according to the April Consumer Price Index data, food prices posted the largest one-month increase since February 1974, and USDA's forecast for food-at-home prices has recently been revised upward. For people living on a tight budget, including many older adults on fixed incomes, higher food prices can have a significant impact on a household's budget.

SNAP provides critical food assistance for 8.7 million households with at least one adult age 50 or older. Reducing food insecurity is linked with improved health outcomes, including reduced hospitalizations among low-income older adults. In contrast, extensive research demonstrates a strong association between food insecurity and negative health outcomes, including USDA's own research showing increased risk for chronic illness. Multiple chronic diseases can reduce a

person's ability to bathe or dress, or to shop and prepare meals, which can affect a person's ability to live at home with independence and dignity. In short, food insecurity is associated with substantial increases in health care costs.

SNAP is especially important for older Americans, many of whom live on fixed incomes, live alone, and have limited financial resources to spend on basic necessities like food, medical care, utilities, transportation, and housing. For households with a member age 75 and older, when faced with critical spending tradeoffs, the most common tradeoff is between food and medicine.

Categorical Eligibility

USDA estimates that the proposed rule would eliminate SNAP eligibility for 3.1 million people. An estimated 13 percent of all SNAP households with elderly members would lose benefits. Since the cuts would disproportionately harm elderly individuals, USDA determined that there is a potential for "civil rights impacts," which is alarming to AARP. Not surprisingly, USDA's regulatory impact analysis finds the proposed rule may "negatively impact food security and reduce savings rates among those individuals who do not meet the income and resource eligibility requirements for SNAP or the substantial and ongoing requirements for expanded categorical eligibility." Additionally, the proposed rule would increase the administrative burden for states and households, and would do so in the middle of a pandemic.

Standard Utility Allowances

As a result of the standard utility allowances proposed rule, USDA estimates that 26 percent of households with elderly members would see a reduction in benefits, representing over 1.2 million households. Among households with elderly members losing benefits, the average monthly benefit loss would be \$36, a nearly 30 percent reduction in the average \$125 a month benefit for these households. Restricting states' flexibility to adjust the utility standard would ultimately result in reduced benefits for many people, undermining SNAP's statutory purpose to alleviate hunger and improve nutrition among low-income households.

We call on you to remain steadfast in your efforts to help feed those in need, and to protect food assistance for older Americans during these uncertain times. If you have any questions, please feel free to contact me or have your staff contact Nicole Burda at nburda@aarp.org.

Sincerely,



Nancy A. LeMond
Executive Vice President and
Chief Advocacy and Engagement Officer