

September 23, 2019

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

Re: Notice of Proposed Rule Making -- Revision of Categorical  
Eligibility in the Supplemental Nutrition Assistance Program (SNAP) RIN  
0584-AE62

Dear SNAP Program Design Branch:

Thank you for the opportunity to comment on the United States Department of Agriculture's (USDA) proposed rule, *Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP)* (RIN 0584-AE62).

The National Association of Social Workers (NASW) represents the interests of over 700,000 social workers nationwide who provide critically needed mental health and other services in a broad range of settings. Founded in 1955, NASW is the largest social work organization in the nation, with 55 chapters. The association has a dual mission of advocating for the social work profession and for the individuals, families, and communities served by social workers.

Given the social work professions' values and primary mission to enhance human well-being and help meet basic human needs, especially of people who are vulnerable and living in poverty, we write in strong opposition of the proposed rule changes to the SNAP program. The proposed changes will cause harm and hardship to individuals, including children and families, and negatively impact communities and our nation, by exacerbating hunger and food insecurity.

SNAP is an anti-poverty program which plays a critical role in addressing hunger and food insecurity across the U.S. It is the first line of defense against hunger for low-income residents, including older adults, people with disabilities and children. Notably, half of all SNAP recipients are children.<sup>1</sup> In 2017, the Center on Budget and Policy

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<sup>1</sup> Understanding SNAP, the Supplemental Nutrition Assistance Program." n.d. Feeding America. Accessed September 23, 2019. <https://www.feedingamerica.org/take-action/advocate/federal-hunger-relief-programs/snap>.

Priorities estimated that 42 million Americans nationwide received SNAP benefits, which is roughly 13% of the U.S. population, who are poor.<sup>2</sup>

Making individuals and families ineligible for SNAP will result in hunger, and suffering, as well as negative health impacts. Social workers interact daily with individuals and families who rely on SNAP benefits to maintain their household. Our experience indicates that food insecurity and poverty are real issues facing clients. According to the United States Department of Agriculture (USDA), in 2017, an estimated 1 in 8 Americans were food insecure, equating to 40 million Americans including more than 12 million children;<sup>3</sup> during that same year, 5.5 million adults 60 years or older in the United States experienced food insecurity.<sup>4</sup>

The food security and health implications of the proposed rule are serious and disturbing. Food insecurity has direct and indirect impacts on physical and mental health for people of all ages. Food insecurity — and even marginal food security (a less severe level of food insecurity)— is especially detrimental to the health, development, and well-being of infants, children, and adolescents.

A loss or reduction in SNAP benefits has detrimental impacts on children and their families. Children in households that participate in SNAP are directly certified for free school meals. Research documents the important role that school meals play in health, development and learning.

Proposals that would undermine Categorical Eligibility (Cat EI) can be expected to entail impacts on access to free school lunches. For example, during congressional consideration of 2018 Farm Bill proposals that would undermine Cat EI, the Congressional Budget Office provided estimates of the numbers of children who would lose school meals as a result of the policy change. CBO estimated “that in an average year, about 400,000 households would lose SNAP eligibility as a result of the change to the gross income threshold. There would be an additional effect on children who are categorically eligible for free meals at school because of their eligibility for SNAP.”<sup>5</sup>

The proposed rule also falls heavily on households with older adults. More than 600,000 SNAP households with members over age 60 (some 13.2 percent of all SNAP households with older adults) would be cut from SNAP food assistance, according to USDA’s

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<sup>2</sup> “A Closer Look at Who Benefits from SNAP: State-by-State Fact Sheets.” 2019. Center on Budget and Policy Priorities. May 1, 2019. <https://www.cbpp.org/research/food-assistance/a-closer-look-at-who-benefits-from-snap-state-by-state-fact-sheets#Alabama>.

<sup>3</sup> Coleman-Jensen, Alisha, Matthew P. Rabbitt, Christian A. Gregory, and Anita Singh. 2018. Household Food Security in the United States in 2017, ERR-256, U.S. Department of Agriculture, Economic Research Service.

<sup>4</sup> Ziliak, J. P., & Gunderson, C. (2019). *The state of senior hunger in America in 2017*. Retrieved from Feeding America Web site: [https://www.feedingamerica.org/sites/default/files/2019-06/The%20State%20of%20Senior%20Hunger%20in%202017\\_F2.pdf](https://www.feedingamerica.org/sites/default/files/2019-06/The%20State%20of%20Senior%20Hunger%20in%202017_F2.pdf)

<sup>5</sup> Congressional Budget Office. 2018. Cost Estimate for H.R. 2. Accessed on August 8, 2019 at [https://www.cbo.gov/system/files/2018-07/hr2\\_1.pdf](https://www.cbo.gov/system/files/2018-07/hr2_1.pdf).

estimates of the effect of the proposed rule. This represents more than one-third of the 1.7 million households the Administration estimates would lose SNAP.

Some 71 million people in the United States are age 60 and older. Many live on fixed incomes and have limited financial means to afford expenses such as food, health, and housing costs. Many have disabilities and multiple chronic conditions. Amid these challenges, older adults commonly care for spouses, partners, children, grandchildren, and other relatives. Unfortunately, food insecurity among older adults is all too common a problem. In 2017, nearly 8 percent (5.5 million) of adults 60 years or older were food insecure; of this group, more than 3 percent (2.2 million) were very low food insecure. These percentages reflect increases of 45 and 129 percent, respectively, since 2001. Households with grandchildren are twice as likely to be food insecure.<sup>6</sup>

Research indicates that food-insecure older adults have less nutritious diets, have worse health outcomes, and are at higher risk for depression than food-secure older adults.<sup>78</sup> Compared to other adult age groups, older adults are particularly vulnerable to the health consequences of food insecurity. SNAP benefits help to alleviate these adverse conditions. For these older adults, SNAP plays an important role. While it provides a modest benefit, just \$125 a month on average for households with members age 60 or older, it enables them to meet their basic food needs. Moreover, if older adults' access to SNAP were restricted, systemic health care costs would likely increase; according to one estimate, disease-associated malnutrition in older adults already costs \$51.3 billion each year.<sup>9</sup>

The proposed rule would gut states' options to eliminate SNAP asset tests and use a higher income test to serve more working households that have significant expenses for shelter and childcare. The current policy option is known as "Broad-Based Categorical Eligibility."

The proposed rule would eliminate SNAP benefits for 3.1 million individuals and punish people with even meager savings. By USDA's own estimates, the proposed rule would cut SNAP benefits over five years by \$10.543 billion, while increasing SNAP administrative costs by \$2.314 billion. Furthermore, USDA concedes, "The proposed rule may also negatively impact food security and reduce the savings rates among those

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<sup>6</sup> Ziliak, J. P., & Gunderson, C. (2019). *The state of senior hunger in America in 2017*. Retrieved from Feeding America Web site: [https://www.feedingamerica.org/sites/default/files/2019-06/The%20State%20of%20Senior%20Hunger%20in%202017\\_F2.pdf](https://www.feedingamerica.org/sites/default/files/2019-06/The%20State%20of%20Senior%20Hunger%20in%202017_F2.pdf)

<sup>7</sup> The Malnutrition Quality Collaborative. (2017). *National blueprint: Achieving quality malnutrition care for older adults*. Retrieved from Defeat Malnutrition Today Web site: <https://defeatmalnutrition.today/blueprint>

<sup>8</sup> Jung SE, Kim S, Bishop A, and Hermann J. (2018). Poor Nutritional Status among Low-Income Older Adults: Examining the Interconnection between Self-Care Capacity, Food Insecurity, and Depression. Retrieved from the National Institutes of Health National Center for Biotechnology Information Web site: <https://www.ncbi.nlm.nih.gov/pubmed/29921540>

<sup>9</sup> Thornton Snider, T., Linthicum, M. T., Wu, Y., LaVallee, C., Lakdawalla, D. N., & Hegazi, R. (2014). Economic burden of community-based disease-associated malnutrition in the United States. *Journal of Parenteral and Enteral Nutrition*, 38, 77s–85s. doi:10.1177/0148607114550000

individuals who do not meet the income and resource eligibility requirements for SNAP or the substantial and ongoing requirements for expanded categorical eligibility.”

Cat El policies have been in place for more than two decades. Congress rejected efforts to gut Cat El, including during its consideration of 2005 budget reconciliation and the 2018 Farm Bill. This USDA rulemaking is an attempt to sidestep Congress and is outside USDA’s authority.

We strongly oppose the proposed rule that would cut food benefits for struggling people and harm our community and urge you to rescind the proposed rule.

Sincerely,

A handwritten signature in cursive script that reads "Sarah Christa Butts".

Sarah Christa Butts, LMSW  
Director, Public Policy