

# RESEARCH BRIEF

## The Hidden Cost of Hunger: How SNAP Churn Harms Older Adults and Strains States

### Executive Summary

**F**ood insecurity remains a critical issue among older Americans, with 9.9 percent of households with an adult aged 65 or over experiencing food insecurity in 2024, a number that grows to 11.3 percent for people over 65 living alone. These rates have been steadily climbing over the past 20 years. The Supplemental Nutrition Assistance Program (SNAP) is pivotal in combating this crisis by providing essential food assistance. However, participation among eligible older adults is alarmingly low, with estimates suggesting that only 55 percent of eligible seniors aged 60 or older participated in SNAP due to barriers such as stigma, complex application processes, and the perception — and realities — of inadequate benefits.



A significant contributor to food insecurity is “churn,” where households experience temporary disenrollment from SNAP, often due to administrative challenges during recertification. Churn affects approximately 17 percent–28 percent of SNAP households annually and disproportionately impacts older adults, particularly those with fixed incomes. This procedural inefficiency not only results in lost benefits for vulnerable individuals but also imposes unnecessary administrative costs, estimated at \$80–\$130 per case, on state agencies.

The budget reconciliation law enacted in July 2025, H.R. 1 (“One Big Beautiful Bill Act”), will likely intensify churn. The law expanded SNAP time limits to adults up to age 64, removes key exemptions for veterans, caregivers, and people experiencing homelessness, and shortens state implementation timelines. SNAP time limits<sup>1</sup> were first introduced in 1996 through the [Personal Responsibility and Work Opportunity Reconciliation Act \(PRWORA\)](#). Under this law, certain adults ages 18–49 without dependents were limited to three months of SNAP benefits every three years unless they met a 20-hour-per-week work requirement or qualified for an exemption. The H.R. 1 changes will particularly harm older adults who may not be able to prove exemptions such as disabilities and may lose benefits due to administrative error or lack of verification. As states now face increased administrative demands and higher administrative costs, with their share rising from 50 to 75 percent, along with a new obligation to contribute to benefit costs, preventing churn and ensuring that every eligible exemption is correctly applied is not just a moral priority, it is a fiscal necessity.

### Key Findings

- **Churn drivers:** Older adults face churn primarily due to procedural hurdles, such as miscommunications during recertification, complex verification requirements, and inadequate support systems.
- **State-level disparities:** While some states lead in addressing churn through innovative policies and transparent data sharing, many lack granular churn data, hindering targeted interventions.

### State Recommendations

1. **Simplify recertification:** Extend recertification periods to three years for all adults age 65 and older and implement the Elderly Simplified Application Project (ESAP). These measures reduce churn and ease administrative burden. States should also proactively identify individuals 60–64 likely to qualify for exemptions, particularly those with medical or caregiving responsibilities, to prevent wrongful terminations under H.R. 1’s new time limits.

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- 2. Enhance administrative systems and data transparency:** Churn measurement should be standardized nationally. States should publish churn rates disaggregated by age, race, and geography to identify where administrative barriers are driving benefit loss. States should use data matching to reduce redundant verification, improve caseworker training, and modernize technology systems to prevent unnecessary disenrollments.
  - 3. Enhance customer service:** Adopt human-centered design in online applications, ensure accessibility for older adults, and improve communication strategies.
  - 4. Invest in staff and customer service infrastructure:** As states face new cost-sharing obligations, investment in trained staff is essential to reduce administrative error rates and avoid fiscal penalties. Expanding call center capacity, simplifying online portals, and offering in-person assistance can help older adults complete recertifications without interruptions.

Addressing these challenges will improve food security for older adults and foster healthier, more dignified aging while reducing state-level administrative inefficiencies.

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## Federal Nutrition Programs to Combat Food Insecurity

Food insecurity is a serious problem among older Americans — and not enough older Americans receive the SNAP benefits that they are eligible for that alleviate food insecurity, improve health outcomes, and facilitate aging with dignity. In 2024, 9.9 percent of households with adults aged 65 and over experienced food insecurity, the highest level in the last 20 years.

SNAP, which provides benefits to eligible adults with low incomes to purchase food each month via an Electronic Benefit Transfer (EBT) card, is the nation's first line of defense against hunger. SNAP is a powerful tool to combat food insecurity among older adults because the program provides choices for participants to purchase food according to dietary, cultural, and religious needs. The program has taken steps to modernize its delivery system and improve ease of use, including through improved EBT cards, an online shopping pilot with over 300 participating retailers, and a Restaurant Meals Program state option for older adults, people with disabilities, and those who are homeless. However, estimates show that SNAP participation among eligible older adults ages 60 and older may be as low as 55 percent.<sup>2</sup> Some eligible older adults choose not to apply for SNAP partly because of perceptions of inadequate benefits, stigma toward food assistance recipients, and lengthy, intrusive application processes.<sup>3</sup>

### Time Limits and the Risk of Increased Churn

H.R. 1 fundamentally alters how time limits are applied in SNAP. It expands “able-bodied adult without dependents” (ABAWD) rules to include adults up to age 64 and removes exemptions for veterans, unhoused individuals, and caregivers of older children. This includes grandparents and other older caregivers raising grandchildren, a group that has grown significantly in recent years.<sup>4</sup> Under the new provisions, caring for a child over age 14 no longer qualifies as an exemption, even though these children still require substantial care and financial resources. As a result, many older adults who are supporting grandchildren will now face time limits despite having increased household needs and fewer means to meet them.

As states continually determine who is meeting time limits or who qualifies for an exemption, this expansion will also lead to more frequent case reviews. Each time a case is touched — at application, interim report, or recertification — the risk of administrative error or delayed processing increases.

Older adults, especially those with unverified disabilities, may be wrongfully classified as ABAWDs and cut off from benefits despite eligibility. Research suggests there is far more cycling in and out of ABAWD status than is commonly understood — for instance, when individuals temporarily lose employment or experience short-term illness.<sup>5</sup>

States are therefore urged to implement robust exemption screening and tracking systems to prevent wrongful terminations and reduce unnecessary churn. Doing so will save administrative costs and protect older adults from hunger.

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## Older Adult SNAP Gap

The SNAP gap among older adults is particularly concerning, given the evidence that SNAP participation helps older adults afford a healthy diet and has a positive impact on health and well-being. Food insecurity increases health care costs, and medical professionals increasingly recognize that food insecurity and its associated stresses have a significant impact on health outcomes.<sup>6</sup> Food insecurity is associated with an increased prevalence of hypertension, diabetes, coronary heart disease, and other cardiometabolic conditions.<sup>7</sup> Older adults with food insecurity have increased rates of adherence to medication if they are enrolled in SNAP.<sup>8</sup> Older adults participating in SNAP note that their benefits, particularly the expansion of benefits due to Emergency Allotments during the COVID-19 Public Health Emergency, allow them to purchase healthy food according to their dietary needs while making fewer difficult tradeoffs between food, housing, utilities, or medical care.<sup>9</sup> Additionally, adults over age 65 who are participating in SNAP have, on average, lower medical costs (\$2,360 lower per year) than non-SNAP participants with low incomes.<sup>10</sup>

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## Churn

Part of the SNAP gap among older adults is the prevalence of “churn” — households going through a brief period of disenrollment from the program but reapplying within 90 to 120 days. A U.S. Department of Agriculture Food and Nutrition Service (USDA FNS) report found that 17 percent to 28 percent of households receiving SNAP experience churn in any given year.<sup>11</sup> In Massachusetts, before key policy and systems improvements were undertaken by the Department of Transitional Assistance with assistance from advocates, 40 percent of older adults without earnings experienced churn, significantly higher than the overall rate of churn statewide.<sup>12</sup> Churn is also more likely to be experienced by Black households and households who either have the lowest or the highest eligible incomes.<sup>13</sup> However, only a handful of states publicly publish their churn data, and disaggregation by age, income, or race is even less common. Some churn exists because households with low incomes may expect not to need to receive benefits anymore, and so, do not recertify but later change their minds; additionally, churn may stem from temporary lapses in eligibility due to short periods of higher income, such as seasonal work.

However, eligibility-related churn is less likely among older adults, who typically have stable, fixed incomes.<sup>14</sup> Instead, churn among older adults most often occurs during the recertification process and is generally driven by administrative barriers rather than noncompliance or a temporary loss of eligibility. These disruptions can arise at recertification or other reporting points during the certification period, often due to delayed communication between the state agency and the household, difficulties verifying required information, hospitalization, or the death of a spouse.

### **The recertification process for SNAP includes many touchpoints that have the potential to cause churn. Generally, recertification includes:**

- notice to the household about the expiration of benefits and the process of recertification;
- application for recertification, including a request for information to determine eligibility;
- an interview over the phone or in-person (for most households, at least once a year);
- submission of any outstanding documents to determine eligibility;
- state verification of eligibility for information that has changed;<sup>15</sup> and
- timely processing of the application.

Delays in any of these steps could cause churn. If the state receives a recertification application 31 days or more after the expiration of a person’s SNAP period, the recertification must be processed as a new application, which can include more steps and increase the amount of time an eligible senior is not receiving SNAP benefits.<sup>16,17</sup>

Though delays or missed steps can be a result of either administrative or household action, assigning “blame” ignores the possibility of miscommunications, confusion, or other barriers that exist within the process.<sup>18</sup> Continued churn leads to increased administrative costs through the processing of new applications, which ironically exacerbates the very administrative burdens that lead to churn in the first place. A 2014 study found that each case of churn costs a state, on

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average, \$80 and could cost states up to \$130 — adding up to millions of dollars per year per state in avoidable administrative costs and burdens on state SNAP employees.<sup>19</sup>

Churn is painful for households. In Missouri, a quarter of older adults experienced SNAP churn between 2006 and 2014, leading to an average benefit loss of \$129 per month.<sup>20</sup> In San Francisco, households that were disenrolled in SNAP experienced a loss of up to \$550 in benefits in the year after they lost their enrollment status.<sup>21</sup> Churn is associated with increased Medicaid claims for emergency room and inpatient visits, while non-churners are more likely to make outpatient visits and pharmacy claims.<sup>22</sup> Some households may not realize they were disenrolled from SNAP until they attempt to access their benefits; without the support they need, former participants are forced to face the impossible choice between food, housing, utilities, medical care, and/or other needs.



## Measuring Churn

Few states are currently measuring churn, and fewer yet publish churn rates. California and Massachusetts are national models for making churn data accessible to the public; however, both states publish general churn data without disaggregation by age, racial group, geographic region, or other variables. Without granularity in disaggregated data, it is difficult to determine what affects churn rates at any given time or tailor solutions to the root causes of churn. Other states, including Colorado, are tracking churn but not making those rates publicly accessible, keeping them behind proprietary algorithms and formulas created by state data system vendors. Without understanding churn rates over time, it is impossible for advocates or agencies to learn which interventions are working.

A proxy measure for churn is application timeliness rates, which are collected by the USDA. An application is timely processed when it is processed within 30 days for standard applications and seven days for expedited. States with challenges in processing applications in a timely manner may have higher rates of churn and difficulties in providing effective customer service, which can be a contributing factor to churn. However, timeliness data must also be used judiciously; it can be a lagging indicator that does not necessarily reflect the reality of SNAP agency processing. For example, a state with past timeliness challenges may see improved timeliness rates if it prioritizes processing the oldest outstanding cases rather than continual processing of incoming cases at the expense of older pending cases.

An additional challenge to publishing churn rates is the lack of a standard metric measuring churn. In a 2015 research brief, the Center on Budget and Policy Priorities noted that several basic churn metrics exist, including the percentage of renewing clients in a given month who are disenrolled and return within 90 days; the percentage of new applicants who were active clients 90 days prior; and the percentage of cases that experience any churn spell in a year.<sup>23</sup> Each of these metrics is useful in its own way but are most useful when combined; none on its own paints a complete picture of why churn is occurring considering significant fluctuations in applications, enrollment, processing, and recertification. In practice, Massachusetts defines churn as the percentage of new applicants who were active clients 90 days prior.

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## Best Practices

There is great promise in actions that the USDA and states have taken so far. These best practices can contribute to a stronger SNAP that better serves older adults:

- **Extend recertification periods:** Some states have extended the recertification period up to three years for households where all members are older adults and/or people with disabilities with no earned income, a crucial tool to keep people enrolled in SNAP. Some states are still at one-year certification periods; others are at two.<sup>24</sup> Extended recertification periods help older adults, who often have fixed incomes, continue receiving SNAP. In an analysis of 2016–2018 data, AARP found “extended certification periods were strongly associated with a 14.5 percentage-points higher SNAP participation rate, with longer certification periods linked to higher participation rates among older adults.”<sup>25</sup> However,

a USDA-Urban Institute study found that extending recertification periods alone is not enough — longer certification periods delay and mitigate, but do not solve, the issue of churn.<sup>26</sup> This is because while extending recertification periods does decrease administrative burden and choke-points between states and households, it does not tackle the root causes of churn at the systems level. These barriers include policies in the recertification process, such as complex verification requirements, language access issues, and communication challenges, so extending certification periods may push choke-points farther into the future. Still, all states should lengthen the recertification period to the three years, have easy and straightforward recertification applications that participants know to recertify well in advance.

■ **Make the recertification application shorter and easier to complete:** State recertification applications can be 12–25 pages long of information that needs to be verified as current and correct. Applications for older adults can be condensed down to just a few pages of relevant verification questions, as exemplified in Pennsylvania.<sup>27</sup> They can also be made more accessible with bigger fonts and simplified language. States should implement the Elderly Simplified Application Project (ESAP), a USDA demonstration project that allows households with members age 60 or older and no earned income to complete a shorter application, benefit from reduced verification requirements, avoid a mandatory recertification interview, and receive certification periods of up to 36 months. Recent amendments under H.R. 1, which extend SNAP time limits from ages 18–54 to 18–64, pose new challenges for implementation.<sup>28</sup> This change underscores the need for careful screening of older adults age 60–64 for disability exemptions, since ESAP can also cover households with disabled individuals. Proper screening ensures that eligible individuals stay exempt from time limits and continue receiving benefits via ESAP’s streamlined process. Currently, it remains uncertain how states will modify ESAP or if the program will change as agencies implement the H.R. 1 provisions.

■ **Improve customer service for older adult clients:** As SNAP application processes transition towards online models, states should ensure that contracts with developers enshrine a human-centered design approach that considers the particular challenges that older adults, people with Limited English Proficiency, and immigrants experience. With these populations in mind, state agencies should have a dedicated customer service line for technical issues staffed by technology support, not reliant solely on eligibility-determining workers. Online transitions must also keep in mind that rural areas in states may have lower access to broadband and should design their applications to be mobile-friendly. States can establish a dedicated toll-free number staffed by navigators specially trained to know and meet the needs of older adults seeking assistance with SNAP recertification and enrollment. Both online and paper applications should be viewable with large print, have clear walk-through instructions, and are regularly user-tested and evaluated by older adults using the applications. Additionally, agencies should also create opportunities to set up application intakes in areas frequented by older adults like community centers, senior centers, libraries, and parks. States can also lessen administrative burdens and provide fewer churn opportunities by streamlining verification procedures across multiple programs, e.g., by using data matches across benefit programs like Supplemental Security Income (SSI) to verify gross nonexempt income, utility expenses, social security, household numbers, residency, and identity where that data is available. Such verification procedure improvements can be used for all households, not just ESAP households.



■ **Leverage cross-agency partnerships to reduce churn and expand outreach through Combined Application Projects (CAPs):** These demonstration projects were a creative partnership between the Social Security Administration (SSA), state agencies, and the Food and Nutrition Service (FNS) to simplify the SNAP application process for recipients of Supplemental Security Income (SSI) who live alone. Recipients of SSI must have a disability or be at least 65 years old and have low income and low resources. The CAP helps streamline both SNAP enrollment and recertification.

When a client is deemed eligible for SNAP through SSI and qualifies for the CAP, the SSA office will share the necessary information with a SNAP caseworker who processes the application and provides benefits to the household, allowing the client to interact only with the SSA office.

While FNS is no longer accepting applications for new CAP demonstrations, the agency continues to work with the 17 states currently operating CAP programs.<sup>29</sup> A related model — the Modified Combined Application Project — allows states to use data from SSA’s State Data Exchange (SDX) to identify SSI recipients who are not currently receiving SNAP but may be eligible, and then send them a simplified application.<sup>30</sup> This approach helps states reach older adults and people with disabilities who may otherwise face barriers to applying for SNAP. All states can improve coordination across agencies and move towards creating unified applications that allow households to apply for multiple benefits at once. For example, Virginia’s CommonHelp platform enables residents to apply for several assistance programs through a single application. Designing these systems in partnership with people with lived experience of poverty is essential to ensure applications remain accessible and do not inadvertently create barriers that could contribute to churn.



- **Standardize churn measurements:** USDA should develop a standard measure of churn to be used by all states. USDA technical advisors and statisticians should work with states that measure churn to understand the metrics and data used as well as challenges to accurately defining and calculating the concept before creating a definition and formula. USDA should create technical assistance resources for states as they build capacity to collect data and calculate churn measures — including breakdowns by age and other participant characteristics — and after a phase-in period, annually publish state-by-state churn measures alongside other data, like error rates and application processing timeliness rates.

## Looking Beyond Churn: Strengthening SNAP for Older Adults

While this brief focuses on reducing churn, addressing churn alone will not fully resolve the barriers many older adults face in accessing and maintaining adequate SNAP benefits. Additional policy and administrative improvements are necessary to ensure older adults can access the full support SNAP is intended to provide, such as:

- **Enhance benefit adequacy:** Advocates and participants nationwide note that a significant barrier to SNAP enrollment is that benefits are simply inadequate and may not be worth the burden of applying. Benefits are based on the USDA’s Thrifty Food Plan — which theoretically, although not always in practice, provides enough in SNAP for a nutritionally adequate diet at a minimal cost made almost entirely from scratch. However, older adults — who may have special dietary needs or face mobility challenges in preparing foods — may find this level of SNAP benefits to be inadequate. More states should adopt options like the Restaurant Meals Program and provide technical assistance to retailers entering the SNAP online ordering pilot, which are crucial for older adults.
- **Change how SSI benefits are counted:** SSI benefits count as unearned income for SNAP purposes, meaning receiving SSI counts against SNAP recipients in calculating their benefits. This is troubling because older adults on fixed incomes only receive a maximum monthly payment for 2024 of \$943 for an individual and \$1,415 for a couple.<sup>31</sup> A recipient’s SNAP amount will be reduced based on how much the household receives in Social Security benefits.
- **Leverage existing medical deduction policy and process:** Currently, only 21 states avail themselves of the Standard Medical Deduction (SMD), which sets monthly medical expense deductions households can claim if their monthly medical expenses are greater than \$35. This is an underutilized deduction as only 13.6 percent of households with older adults have used it.<sup>32</sup> States can implement SMD by requesting a demonstration waiver. Each state with an SMD demonstration waiver sets its own standard deduction amount. The 21 states currently participating have an SMD ranging from \$115 to \$200. An eligible SNAP household in a state with an SMD claims it by demonstrating that they incur out-of-pocket medical expenses greater than \$35 a month. The SMD avoids excessive paperwork for clients and caseworkers and simplifies the process for claiming medical deductions for households.<sup>33</sup>

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Even for those states with an SMD, it is essential to ensure medical expenses are correctly and easily accounted for in SNAP enrollment and recertification, as this may result in higher benefit amounts for older adults. States have significant leeway in defining “reasonable” travel costs for medical expenses and the rate of reimbursement, and states like Missouri allow travel costs to include trips to the pharmacy in addition to medical appointments.<sup>34</sup> Options include allowing older adult participants to self-attest, rather than supplying receipts, for medical expenses up to \$35 and designing applications to auto-tabulate mileage expenses or public transportation costs for medical appointments based on entered addresses. Federal law requires state SNAP agencies to verify medical expenses, however, states have flexibility in how they meet this requirement. To improve the process for claiming medical expenses, states can better inform SNAP applicants and recipients about the medical deduction, allow them to self-attest and adopt a SMD.<sup>35</sup> For example, Massachusetts allows households to self-attest to medical expenses less than \$190 per month.<sup>36</sup> Transportation deductions are likely underclaimed but could entitle older adults to additional benefits.<sup>37</sup>

- **Work with state legislatures to safeguard budgets:** States also face new fiscal pressures under H.R. 1. For the first time, states with payment error rates above 6 percent must share the cost of SNAP benefits, and the federal reimbursement for administrative costs declines from 50 percent to 25 percent, leaving states responsible for 75 percent of administrative expenses. Legislatures should consider strategies to protect both residents and state budgets, including targeted nutrition supports for households that lose eligibility due to time limits or administrative barriers. Improving administrative processes that reduce churn and prevent wrongful terminations can also help states avoid significant costs associated with case reprocessing and error corrections.

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## Conclusion

As food insecurity among older adults reaches its highest levels in two decades, the need to strengthen and simplify access to SNAP has never been more urgent. Churn — an avoidable costly and harmful cycle of temporary disenrollment — exacerbates food insecurity, undermines the health and well-being of older adults, and places unnecessary burdens on state agencies. The evidence is clear: When SNAP participation is stable, older adults experience improved health outcomes, reduced medical expenses, and state agencies see reduced burden.

Reducing churn is not only achievable, but essential. States and the federal government must act decisively by extending recertification periods, adopting simplified application processes like ESAP, utilizing standard medical deductions, and improving customer service infrastructure. Equally critical is the need for data transparency and the development of standardized churn metrics that enable targeted, evidence-based reforms.

By implementing the recommendations outlined in this brief, policymakers and administrators can ensure that older adults are not left behind in our nation’s fight against hunger. Ensuring consistent, accessible SNAP benefits is a key step toward a healthier, more equitable future for all.

**Suggested research citation:** Walcott, L., Plata-Nino, G., & Thrasher, D. (2026). *The hidden cost of hunger: How SNAP churn harms older adults and strains states*. Food Research & Action Center. <https://frac.org/wp-content/uploads/SNAP-Churn-Harms-Older-Adults-Strains-States.pdf>

## Endnotes

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- <sup>24</sup> States that have not implemented the Elderly Simplified Application Project (ESAP): Alabama, Alaska, Arkansas, Connecticut, Delaware, District of Columbia, Georgia, Hawaii, Indiana, Iowa, Maine, Mississippi, Nebraska, Nevada, North Dakota, Ohio, South Dakota, Tennessee, Texas, Washington, Wisconsin, Wyoming. Of these states, Alaska, Hawaii, Iowa, Maine, Nebraska, Nevada, North Dakota, South Dakota, Tennessee, Wisconsin, and Wyoming. These states certification periods are a year, whereas ESAP would extend older adult recertification periods up to three years. <https://fns-prod.azureedge.us/sites/default/files/resource-files/snap-16th-state-options-report-june24.pdf#page=9>. New York implements an SSI-Combined Application Projects, discussed later, with a four-year recertification period with check in intervals at 2 years.
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- <sup>26</sup> Mills, G., et al. (2014, November). *Understanding the rates, causes, and costs of churning in the Supplemental Nutrition Assistance Program*. Food and Nutrition Service, U.S. Department of Agriculture. <https://fns-prod.azureedge.us/sites/default/files/ops/SNAPChurning.pdf>
- <sup>27</sup> *Pennsylvania's simplified SNAP application*. <https://www.pa.gov/content/dam/copapwp-pagov/en/dhs/documents/services/assistance/documents/benefits-applications/PA%201935.pdf>
- <sup>28</sup> Levin, M., Kauff, J., Negoita, M., Dragoset, L., Goger, A., Baxter, C., Paprocki, A., Makowsky, L., Gutierrez, I., Brown, E., & Sarver, M. (2020, May). *Evaluation of alternatives to improve elderly access to SNAP*. U.S. Department of Agriculture, Food and Nutrition Service. <https://spra.com/wp-content/uploads/2022/06/Elder-SNAP-Full-Report.pdf>
- <sup>29</sup> U.S. Department of Agriculture, Food and Nutrition Service. (n.d.). *Combined application projects*. <https://www.fns.usda.gov/snap/combined-application-projects#:~:text=Under%20a%20CAP%2C%20eligible%20SSI,to%20the%20state%20SNAP%20agency>
- <sup>30</sup> Food Research & Action Center. (2017, June). *A guide to Supplemental Security Income/Supplemental Nutrition Assistance Program combined application projects*. <https://frac.org/research/resource-library/guide-supplemental-security-incomesupplemental-nutrition-assistance-program-combined-application-projects>
- <sup>31</sup> Social Security Administration. (n.d.). *How much you could get from SSI*. <https://www.ssa.gov/ssi/amount#:~:text=The%20maximum%20monthly%20SSI%20payment,living%20situation%2C%20and%20other%20factors>
- <sup>32</sup> U.S. Department of Agriculture, Food and Nutrition Service, Office of Policy Support. (2024, June). *Characteristics of Supplemental Nutrition Assistance Program households: Fiscal year 2022 (Report No. SNAP-22-CHAR)*. (see Page 69) <https://fns-prod.azureedge.us/sites/default/files/resource-files/ops-snap-fy22-characteristics.pdf>
- <sup>33</sup> Drumgold, L., & Plata-Nino, G. (2023, September). *The SNAP standard medical deduction for older adults and people with disabilities*. Food Research & Action Center. <https://frac.org/wp-content/uploads/SNAP-SMD-National-Report-1.pdf>
- <sup>34</sup> Jones, T. (2014, August). *SNAP's excess medical expense deduction: Targeting food assistance to low-income seniors and households with disabilities*. Center on Budget and Policy Priorities. <https://www.cbpp.org/sites/default/files/atoms/files/8-20-14fa.pdf>
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- <sup>37</sup> U.S. Department of Agriculture, Food and Nutrition Service. (n.d.). *Applications, statements, unreported/unverified expenses*. <https://www.fns.usda.gov/snap/eligibility/applications-statements-unreported-unverified-expenses>