

Model Template for Commenting on Proposed SNAP Rule for Organizations Representing Seniors

We ask that you modify the language provided below so that at least one-third of it is different than the template. Adding your own language is preferable but you can also cut out sections of the template. This will ensure that each submitted comment counts as a unique comment.

[Date]

Certification Policy Branch
SNAP Program Development Division
Food and Nutrition Service, USDA
3101 Park Center Drive
Alexandria, Virginia 22302

RE: Proposed Rule: Supplemental Nutrition Assistance Program (SNAP):
Requirements for Able-Bodied Adults without Dependents RIN 0584-AE57

Dear Certification Policy Branch:

[I/we] are writing to express strong opposition to USDA's Proposed Rulemaking on SNAP Requirements and Services for Able-Bodied Adults Without Dependents (ABAWDs), Ages 18-50. This rule is harsh and unfair. It harms vulnerable people by denying them food benefits at a time when they most need it and it does not result in increased employment and earnings. The proposed changes would cause serious harm to seniors and their families, our community, and the nation. By the Administration's own calculations, the proposed rule would take food away from 755,000 low-income adults, cutting food benefits by \$15 billion over ten years.

[FILL IN INFORMATION ABOUT YOU, your city or your organization's mission]. _____.

Even though the rule explicitly targets non-seniors (ABAWDs, ages 18-50), the rule has multiple negative impacts on the health, nutrition, and economic security of older adults and the family members that many seniors depend on for care and financial assistance.

[FILL IN INFORMATION how great SNAP is for seniors]. _____.

SNAP is an essential program to put food on the table for more than 4.2 million participating seniors.

[To help make each comment count as a separate, you may want to create your comment using just one of the following underlined sections]

SNAP helps pave the way for healthy aging: Experts in aging know that good health and economic security earlier in life are directly related to those outcomes later in life. Connecting individuals to SNAP due to a life circumstance — a job loss, reduced hours, the need to care for a sick relative, an economic downturn — is critical for safeguarding an individual's health and well-being. A raft of studies show that SNAP improves food security, dietary intake, and health and with lasting effects. (See: *Hunger and Health — The Role of the Supplemental Nutrition Assistance Program in Improving Health and Well-Being* <http://frac.org/wp-content/uploads/hunger-health-role-snap-improving-health-well-being.pdf>).

[Add information on how nutrition in all stages is important to health aging]

This rule would eliminate SNAP benefits for many adults in need and thereby undercut their ability to pave the way for healthy aging.

SNAP helps seniors and their families care for each other: By harming family members, the SNAP time limit would result in harm to many seniors as well. Families living in poverty often depend on pooled resources (including SNAP benefits). Additional burdensome restrictions on SNAP eligibility for ABAWDs would translate to fewer resources available to support the health and well-being of seniors — on several fronts.

A senior may need to provide help to a son, daughter, or a relative pushed off of SNAP due to time limits. This can create a financial burden for a low-income senior already struggling to make ends meet.

A senior may lose resources pooled from relatives who are now denied SNAP benefits. For families living at or near the poverty level, these losses of pooled resources could mean sacrificing basic needs to fill gaps in lost SNAP benefits, undermining a senior's ability to pay rent, pay for transportation to a job, or eat a healthy diet.

[Add a story if you have one about someone caring for a senior who could be subject to ABAWD rules]

Proposed Rule Undermining Law's Safety Valves Should Be Rejected

[I/We] strongly oppose the proposed rule that would expose even more people to the arbitrary food cutoff policy by limiting state flexibility regarding area waivers and individual exemptions. The Administration does not estimate any improvements in health or employment among the affected population.

The Administration's proposed rule seeks to end run Congress, which just enacted the comprehensive 2018 Farm Bill without harmful changes to SNAP.

The rules governing area eligibility for waivers and individual exemptions have been in place for over 20 years. In that time, the waiver rules have proven to be reasonable, transparent, and manageable for states to operationalize.

[I/We] strongly oppose the proposed rule that would expose even more people to the arbitrary SNAP food cutoff policy and harm our community.

Sincerely,

XXXXX