



## ***A World Where Aging is Honored***

**CVCOA Helpline 1-800-642-5119**

September 16, 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:

On behalf of Central Vermont Council on Aging, we appreciate the opportunity to comment on USDA's Notice of Proposed Rule Making on a Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP). The proposed changes would cause serious harm to Vermonters age 60 and over, in addition to many others in our community and the nation. The proposed rule should be withdrawn.

Central Vermont Council on Aging works with thousands of older Vermonters each year, including a large focus on SNAP outreach and application assistance. Last year, we worked with almost 1000 individuals over 60 to support them to apply for or learn about SNAP benefits. Our mission is to support older Vermonters to age with dignity and choice, and accessing available public benefits is part of that mission.

SNAP (known in Vermont as 3SquaresVT) plays a critical role in addressing hunger and food insecurity in Vermont. It provides, on average, over 70,000 Vermonters and 40 million Americans with money to spend on food in grocery stores and farmers markets each month. It is proven to reduce hunger, lift people out of poverty, and leads to positive short and long-term health, education, and employment outcomes.

For older Vermonters, access to SNAP benefits allows them to enhance their nutrition purchasing. We know that nutrition is one of the main factors in helping keep older people at home. Good nutrition for older Americans reduces risks of falls and chronic illnesses—conditions which greatly increase healthcare spending for emergency room visits, hospitalizations, and placements in long-term care and nursing facilities.

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 child care. The current policy option is known as "Broad-Based Categorical Eligibility" (or "Cat El"). <https://fns-prod.azureedge.net/sites/default/files/snap/BBCE.pdf>

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The proposed rule would eliminate SNAP benefits for older people with meager savings who in spite of working for decades are not able to afford nutritious food. 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 individuals who do not meet the income and resource eligibility requirements for SNAP or the substantial and ongoing requirements for expanded categorical eligibility."

According to the Department for Children and Families, if this proposal is enacted, approximately 5,204 households and 13,366 Vermonters would be expected to lose benefits. Furthermore, nearly half of these households (2,385) include at least one member who is 60 and over or who is living with a disability. These Vermonters rely on 3SquaresVT to make sure they get the nourishment they need to stay healthy, live independently, and age with dignity. These are grandparents raising grandchildren, and people who have worked their whole lives but still struggle to put enough food on the table. These are Vermonters on fixed incomes who may have some savings for emergencies, but who have high and increasing monthly medical expenses. These are not people who deserve to have their food assistance threatened.

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 side step Congress and is outside USDA's authority.

The real issue is that millions of Americans and thousands of Vermonters are struggling to make ends meet and aren't able to access enough food to grow, learn, and stay healthy. Instead of proposing severe cuts to programs like SNAP, the Trump administration should be working to increase wages and improve access to housing, health care, and food assistance.

Central Vermont Council on Aging strongly opposes the proposed rule that would cut food benefits for struggling people and harm our community.

Sincerely,

Beth Stern

Executive Director, CVCOA