

United States Senate

WASHINGTON, DC 20510

April 10, 2023

The Honorable Thomas J. Vilsak
Secretary
U.S. Department of Agriculture
1400 Independence Ave., SW
Washington, DC 20250

The Honorable Kilolo Kijakazi
Acting Commissioner
Social Security Administration
6401 Security Blvd.
Baltimore, MD 21235

Dear Secretary Vilsack and Acting Commissioner Kijakazi,

We write in response to the December 8 announcement that the U.S. Department of Agriculture (USDA) and Social Security Administration (SSA) will strengthen their partnership to help connect Supplemental Nutrition Assistance Program (SNAP) and Supplemental Security Income (SSI) benefits.¹ We commend USDA and SSA for taking this step, but have concerns about challenges SSI applicants and recipients face in obtaining SNAP benefits. We write to detail these concerns and urge USDA and SSA to expand access to combined SSI and SNAP applications, ensure equity in the amount of benefits people receive and work to remove administrative burdens that create barriers to food security.

SSI recipients are low-income people at least 65 years old, or blind or disabled adults or children.² The inability to consistently access food acutely impacts populations eligible for SSI benefits. Households that include an adult or child with a disability are at higher risk for food insecurity.³ For older Americans, food insecurity comes with significant health risks including increased likelihood of lower cognitive function, depression, high blood pressure, congestive heart failure, diabetes, or heart attack.⁴ And Black and Hispanic households are “at least twice as likely as white households to experience food insecurity.”⁵

¹ Press Release: USDA and Social Security Administration Collaborate to Improve Nutrition Security through SNAP, Soc. Sec. Admin. (Dec. 8, 2022), <https://www.ssa.gov/news/press/releases/2022/#12-2022-2>.

² See 42 U.S.C. § 1381a.

³ *Disability Status Can Affect Food Security Among U.S. Households*, U.S. Dep’t of Ag. (Nov. 14, 2022), <https://www.ers.usda.gov/data-products/chart-gallery/gallery/chart-detail/?chartId=105136&cpid=email>; Ruth Rose-Jacobs et al., *Children with Special Health Care Needs, Supplemental Security Income, and Food Insecurity*, 37 J. of Dev. and Behavioral Pediatrics, 140 (Feb. 2016), https://journals.lww.com/jrmldbp/Abstract/2016/02000/Children_with_Special_Health_Care_Needs_4.aspx.

⁴ Heather Hartline-Grafton, *Hunger is a Health Issue for Older Adults: Food Security, Health, and the Federal Nutrition Programs*, Food Research & Action Center (Dec. 2019), <https://frac.org/wp-content/uploads/hunger-is-a-health-issue-for-older-adults-1.pdf>.

⁵ Steven Carlson and Joseph Llobrera, *SNAP is Linked with Improved Health Outcomes and Lower Health Care Costs*, Center on Budget and Policy Priorities (Dec. 14, 2022), <https://www.cbpp.org/research/food-assistance/snap-is-linked-with-improved-health-outcomes-and-lower-health-care-costs>.

To help alleviate food insecurity, SSA and USDA must create a seamless path to ensuring that SSI recipients and applicants can obtain SNAP benefits, one with minimal administrative burden. SNAP is the nation’s largest anti-hunger program and SNAP benefits⁶ translate to fewer people in poverty⁷ and a healthier population.⁸

Despite congressional and agency efforts, the process by which SSI recipients and applicants obtain SNAP benefits is administratively burdensome. Federal law requires that some SSI applicants and recipients “be informed of the availability of benefits under [SNAP] and be assisted in making a simple application,” and have their application sent directly from SSA to the state agency responsible for processing SNAP applications.⁹ Both USDA and SSA have demonstrated a commitment to implementing this law. USDA reimburses SSA for SNAP screenings and applications, and the new memorandum of understanding announced December 8 is aimed at “improv[ing] efficiency, helping advance food and nutrition security and reduc[ing] the hurdles families face to obtain the government assistance they need.”

Even with this commitment, USDA has recognized that the “joint application process has not always worked as seamlessly as originally intended.”¹⁰ To address these shortcomings, USDA allows states to simplify the SNAP application process for SSA Offices through the Combined Application Program (CAP), which permits those applying for or receive SSI to fill out a simplified SNAP application. The state agency that processes SNAP applications can use the simplified version, along with SSI eligibility information, in the application-review process. Massachusetts implemented its CAP program in 2005; seventeen states participate in it.

Although joint and combined applications are linked to higher participation in SNAP for SSI recipients, seniors and people with disabilities “still face many barriers when applying for SNAP” including extensive or complicated SNAP application forms.¹¹ States with CAP programs have some discretion to limit the amount of SNAP benefits that someone can get and which SSI applicants and recipients may participate. We understand that CAP allotments vary widely across states. In Pennsylvania, for example, the maximum CAP allotment is only 56

⁶ Generally, SNAP is available to very low-income individuals and families with children who meet immigration and citizenship requirements, income limits, and, in some cases, work or education requirements. 7 U.S.C. § 2014.

⁷ Danielle Wilson and Liana Fox, *SNAP Moved 3.2 Million People Out of Poverty in 2018*, United States Census Bureau (Dec. 3, 2019), <https://www.census.gov/library/stories/2019/12/supplemental-poverty-measure-shows-state-level-impact-of-food-stamps.html>.

⁸ When people have SNAP, Medicaid costs fall — especially for those with chronic illness — fewer people are hospitalized, and people are more likely to maintain their primary health care and medications. Seth A. Berkowitz et al., *Supplemental Nutrition Assistance Program Participation and Health Care Use in Older Adults*, 174 *Annals of Int. Med.* 1674 (Dec. 2021), <https://www.acpjournals.org/doi/full/10.7326/M21-1588>; Hartline-Grafton, *supra* n. 3; Laura J. Samuel et al., *Does the Supplemental Nutrition Assistance Program Affect Hospital Utilization Among Older Adults? The Case of Maryland*, 21 *Pop. Health Management* 88 (Apr. 2018), [https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5906726/#:~:text=Results%20from%20this%20study%20indicate,in%20dually%20eligible%20older%20adults.](https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5906726/#:~:text=Results%20from%20this%20study%20indicate,in%20dually%20eligible%20older%20adults.;); Rajan Anthony Sonik, *Massachusetts Inpatient Medicaid Cost Response to Increased Supplemental Nutrition Assistance Program Benefits*, 106 *Am. J. Pub. Health* 443 (Nov. 2015), <https://ajph.aphapublications.org/doi/full/10.2105/AJPH.2015.302990>.

⁹ 7 U.S.C. § 2020(i).

¹⁰ Combined Application Projects: Guidance for States Developing Projects, U.S. Dep’t of Agr. (June 2004), <https://www.fns.usda.gov/snap/combined-application-projects-0>.

¹¹ Justin Schweitzer et al., *How Dehumanizing Administrative Burdens Harm Disabled People*, Center for Am. Progr. (Dec. 5, 2022), <https://www.americanprogress.org/article/how-dehumanizing-administrative-burdens-harm-disabled-people/>.

percent of the maximum SNAP grant for one person.¹² And most states design their CAP program so that only “one person households consisting of an elderly individual or an individual with a disability who receives SSI and has no earned income” can access SNAP through the state’s CAP program.¹³ In Massachusetts, anti-hunger advocates reported that fewer than 100 CAP applications were received in most months despite SSA processing more than 24,000 SSI applications during that same period.¹⁴ This suggests very limited CAP utilization, and we urge SSA and USDA to explore systemic changes to facilitate greater access to SNAP for SSI recipients or applicants and to ensure that the CAP allotment in every state reflects what SSI recipients would likely receive were they to submit regular applications for SNAP.

For SSI recipients and applicants in the thirty-three states without a CAP program or for individuals who do not qualify for CAP, the SNAP application process can be difficult — marked by administrative burden, an inaccessible application process, delays in receipt of benefits and the stigma that can accompany asking for help to pay for food.¹⁵ Applying for SSI alone can be a daunting process.¹⁶ For some SSI recipients and applicants, any additional administrative burden can deter them from seeking SNAP benefits.¹⁷

USDA and SSA must consider opportunities to increase the number of states participating in CAP, expand CAP eligibility, ensure CAP allotments are equal to what regular SNAP applicants receive, and make the SNAP screening and application process easier for SSI recipients in non-CAP states. No one should go hungry because of confusion about an application, problems with paperwork, or processing wait times.

In order to better understand how USDA and SSA are working to improve SNAP access for SSI recipients and applicants, we request written answers or a staff briefing to the following questions by April 14, 2023:

1. How many SNAP applications did SSA and its regional offices receive in 2020, 2021, and 2022? For each of those three years:
 - a. How many SNAP applicants received SSI?

¹² Operations Memorandum #23-01-02, Penn. Dep’t of Human Services (Jan. 27, 2023)

[http://services.dpw.state.pa.us/oimpolicymanuals/snap/OPS_23-01-02_Supplemental_Nutrition_Assistance_Program_\(SNAP\)_Cost_of_Living_Adjustment_\(COLA\)_Change.pdf](http://services.dpw.state.pa.us/oimpolicymanuals/snap/OPS_23-01-02_Supplemental_Nutrition_Assistance_Program_(SNAP)_Cost_of_Living_Adjustment_(COLA)_Change.pdf).

¹³ Kathryn Cronquit and Brett Eiffes, Characteristics of Supplemental Nutrition Assistance Program Households: Fiscal Year 2020, U.S. Dep’t of Agriculture, at 10 (June 2022),

<https://fns-prod.azureedge.us/sites/default/files/resource-files/Characteristics2020.pdf>.

¹⁴ SSI Annual Statistical Report 2021, Social Sec. Admin., at 126 (Sep. 2022),

https://ssa.gov/policy/docs/statcomps/ssi_asr/.

¹⁵ A Guide to Supplemental Security Income/ Supplemental Nutrition Assistance Program Combined Application Projects, Food Research & Action Center (June 2017), <https://frac.org/wp-content/uploads/guide-ssi-snap-combined-application-projects.pdf>.

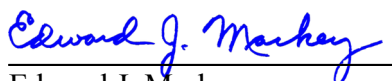
¹⁶ The vast majority of Social Security applications are denied, and the appeals process takes, on average, 147 days. Social Security Annual Data for Disability Reconsideration Average Processing Time, Social Sec. Admin. (Dec. 21, 2021), https://ssa.gov/open/data/disability_reconsideration_average_processing_time.html; Outcomes of Applications for Disability Benefits, Social Sec. Office of Retirement and Disability Policy, https://ssa.gov/policy/docs/statcomps/di_asr/2020/sect04.html#chart11.

¹⁷ Ashley Burnside et al., *Advancing Disability Equity and Access in TANF and SNAP for People with Long COVID*, CLASP (Oct. 2022), <https://www.clasp.org/publications/report/brief/advancing-disability-equity-and-access-in-tanf-and-snap-for-people-with-long-covid/>.

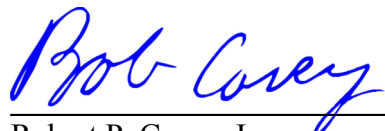
- b. How many CAP applicants did SSA send to SNAP state agencies process, broken down by the participating CAP states?
 - c. How many SNAP applications did SSA take for SSI recipients and sent to the non-CAP states or for non-CAP eligible households?
 - d. How many SNAP applicants in each state received SSI?
 - e. What proportion of CAP recipients receive less than the maximum SNAP grant for their household size, and what is USDA's protocol for determining the amount of CAP allotments?
2. What additional measures are USDA or SSA considering to improve SNAP access for SSI recipients and applicants?
 - a. Is USDA or SSA considering changes to electronic systems to facilitate access to SNAP applications for SSI recipients or applicants, including creating mandatory fields for CAP states?
 3. How do USDA and SSA collaborate to communicate information about benefits to recipients and applicants?
 4. Are USDA or SSA considering expanding CAP or implementing other combined applications processes?

cc: USDA Deputy Undersecretary Stacey Dean

Sincerely,



Edward J. Markey
United States Senator



Robert P. Casey, Jr.
United States Senator



Elizabeth Warren
United States Senator




Richard Blumenthal
United States Senator



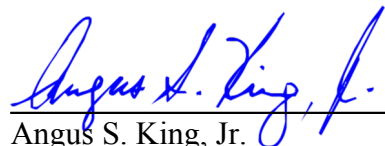
Bernard Sanders
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Angus S. King, Jr.
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