



**DIVERSE
ELDERS
COALITION**

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MEMBER ORGANIZATIONS

National Asian Pacific
Center on Aging (NAPCA)

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National Hispanic
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National Indian
Council on Aging (NICOA)

SAGE

Southeast Asia Resource
Action Center (SEARAC)

Nancy Potok
Chief Statistician
Office of Management and Budget
9257 New Executive Office Building
725 17th St. NW
Washington, DC 20006

June 5, 2019

Re: Directive No. 14 / OMB-2019-0002

Dear Ms. Potok,

Thank you for the opportunity to respond to the recently released OMB Directive No. 14: "Consumer Inflation Measures Produced by Federal Statistical Agencies." As an organization dedicated to improving aging in communities of color, American Indian and Alaska Native communities, and lesbian, gay, bisexual, and transgender (LGBT) communities, the Diverse Elders Coalition is very concerned about the impact that this proposed change would have on the most vulnerable older Americans.

We understand that you are not seeking comment on the impact of changing the Dept. of Health and Human Services poverty guidelines, so this comment does not reflect that issue. However, a change to the thresholds that impact those guidelines will have programmatic effects across many areas that impact aging in our communities. Changes of those magnitude must not be undertaken without in-depth research and analysis and an opportunity for public comment on the impact of those changes.

A few of the programs utilized by vulnerable older Americans that would be impacted by OMB's proposal are outlined below. In addition to the concerns that would be shared by older adults of all backgrounds, we know that the communities served by the Diverse Elders Coalition face additional barriers to accessing these programs and services, so the impacts would be disproportionately felt by our constituencies.

Medicaid

With smaller annual adjustments to the federal poverty line, the income eligibility limits for Medicaid will be lower than they otherwise would be in any given year, with the reductions growing larger over time. Therefore, this proposal is effectively imposing an automatic cut to Medicaid eligibility, with the magnitude of the cut becoming sharper each year. Similarly, Medicaid expansion in 37 states and Washington, D.C. has resulted in increased healthcare coverage for millions of adults with incomes below the income-eligibility cutoffs, including older adults who are not yet eligible for Medicare. Shrinking the inflation adjustment for the poverty measure will undo some of this progress, causing more people to be uninsured.



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Prescription Drug Subsidies

Older adults who receive Medicare can get help paying for prescription drugs if their incomes are low enough to qualify. If the poverty measure's annual inflation adjustment is reduced, by the 10th year it is estimated that more than 250,000 seniors would lose or get less help from prescription drug subsidies.

Supplemental Nutrition Assistance Program (SNAP)

In the United States, 4.9 million people age 60 and older are food insecure, which equates to 1 in every 12 older adults, according to a 2016 report by Feeding America. For people below 185 percent of the poverty line, more than 30 percent were food insecure. We should not be increasing the number of households that do not qualify for SNAP assistance when so many beyond even the current guidelines find it difficult to afford an adequate diet.

We know that households just above the official poverty line report higher than average rates of food insecurity and difficulty paying rent and utilities. They are more likely to be uninsured. These vulnerable older adults need programs such as Medicaid, Medicare Part D prescription drug subsidies, SNAP, LIHEAP, and Weatherization. **Far from making the annual assessment more accurate, simply shrinking the annual inflation adjustment for the poverty measure will make the current flaws worse.** Denying us benefits by making the poverty line a less accurate reflection of our circumstances is contrary to Congressional intent and the national interest.

Thank you very much for your time and consideration. If you have questions about the comments provided above, you can reach me at jmcdavid@diverseelders.org or 646-653-5015.

Sincerely,

Jenna McDavid
National Director
Diverse Elders Coalition