



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

Department of
Health and Social Services

ALASKA COMMISSION ON AGING

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September 10, 2015

Ms. Monica Mitchell, Program Officer
Department of Health and Social Services
Division of Public Assistance
350 Main Street, Suite 306
Juneau, Alaska 99801-0640

Regarding: Proposed Changes to Regulations for Senior Benefits (7 AAC 47.570)

Dear Ms. Mitchell:

The Alaska Commission on Aging (ACoA) appreciates the opportunity to provide public comment on the proposed changes to regulations for the Alaska Senior Benefits Program. Senior Benefits is an important program for an estimated 11,475 older Alaskans in economic need who depend on the monthly cash assistance to help pay for basic necessities such as housing, food, utilities, and prescribed medications (Division of Public Assistance, May 2015). According to findings from the 2,280 Alaskans age 55 years and older who responded to the Senior Survey 2015 conducted by ACoA in preparation for the Alaska State Plan for Senior Services, FY2016-FY2019, financial security was identified as the second most important issue facing Alaskan seniors today following access to affordable health care. Of those responding, 59% could be considered as financially insecure with 44% reporting having just enough income to cover basic household expenses with nothing left over to pay for an unexpected emergency expense and 15% stating that they did not have sufficient income to make monthly ends meet.

The Commission recognizes the gravity of the State's current fiscal situation and appreciates the Division's efforts to sustain the Senior Benefits program for as long as possible causing the least amount of harm for older Alaskans with the greatest economic need. In the short-term, we recommend:

- Continuation of the \$250 monthly cash assistance for seniors with household incomes up to 75% federal poverty level (FPL) as proposed in the draft regulations as these seniors are the most financially vulnerable. They numbered 1,442 in December 2014.
- Apply the largest pro rata reductions to those with household incomes at 175% FPL rather than seniors at 100% FPL as originally proposed.
- Provide adequate notification to current Senior Benefit recipients of changes to their benefit levels and to note that time period, preferably 90 days, in the proposed regulations.
- Apply a cap on new enrollees if the appropriation amount is insufficient in order to prevent further benefit reductions for existing recipients.
- Provide information about other public assistance programs such as heating assistance and the Supplemental Nutrition Assistance Program (SNAP) to provide relief for seniors who income-qualify but have applied for Senior Benefits when a cap has been imposed.

In the long-term, we recommend consideration of the following measures to sustain Senior Benefits when the program is scheduled for sunset review in FY2018 as these strategies may necessitate a change in statute:

- Require U.S. citizenship for the Senior Benefits program to be aligned with requirements of all other needs based programs administered by the Division of Public Assistance. Certain safeguards could be implemented to protect Senior Benefit recipients who are required to live in another location for medical reasons.
- Permanently cap the number of recipients at the 175% FPL and initiate a phase-out of this payment tier to potentially realize a projected cost avoidance savings estimated at \$7.7 million based on payments made in December 2014 (5,108 seniors X \$125 month payment assistance X 12 months).
- Increase the age of eligibility for Senior Benefits from 65 to 67 to target benefits to older seniors who have the greatest economic need and are of age for retirement with full Social Security benefits. This strategy will reduce the number of recipients and provide a savings for the program. Consideration should be given to include a hold harmless clause to protect those already receiving benefits from the program.

Thank you for this opportunity to provide comment and for the Division's good work in providing public assistance to vulnerable Alaskans. Please contact Denise Daniello, ACoA's executive director, for additional information at denise.daniello@alaska.gov or 465-4879.

Sincerely,



Mary E. Shields
Chair, Alaska Commission on Aging

Sincerely,



Denise Daniello
ACoA Executive Director