



January 31, 2011



Kevin Concannon
Under Secretary
Food, Nutrition and Consumer Services
United States Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

Re: California SNAP Reporting Waiver & Simplified Reporting

Dear Mr. Concannon

In July of 2009 over 80 California advocates wrote to Deputy Undersecretary Thornton in regards to the California Department of Social Services' (CDSS) request to extend waiver #2030030, which maintains California's current combined periodic-change reporting system for CalFresh (formerly the Food Stamp Program) with reports due on a quarterly basis.

Our initial request to reject any additional extensions of the waiver was made with the intention that doing so would accelerate movement toward semi-annual reporting (SAR). As we mentioned in our July correspondence, since 2005 the Western Region Office of FNS has been encouraging California to move to simplified reporting in order to reap the benefits of administrative relief, error rate reduction and improved client access. As advocates we have long supported a move to simplified reporting. Given California's participation rate, which has historically been one of the lowest in the country, we are well aware of the need to do more to improve SNAP in California.

Since our initial request, we have been supportive of the actions that FNS has taken to expedite California's implementation of a simplified reporting system. However, we believe the state has yet to make the "accelerated progress" towards simplified reporting conversion desired by USDA.

Submission of a Passive SAR Work Plan

As you are aware, the short term extension of the current reporting waiver which has allowed CDSS to continue managing Ca IFresh under current conditions was contingent upon CDSS's submission of a work plan outlining conversion from the current reporting system to simplified reporting. We believe the plan submitted, though fulfilling FNS's





request, was ineffectively passive and lacked CDSS's critical involvement in making progress toward SAR implementation. The plan simply recognized that legislation was needed, yet did not contain the supporting details and actions needed to realize the statutory change.

Because CDSS did not outline how the department would play a more active role in achieving the needed legislative changes, the plan was essentially put off to others to develop. CDSS could have taken a central role in the development of a plan by outlining key components to be included in legislation as well as the changes not requiring legislative action. In addition, the administration could have proposed SAR through the Governor's budget proposals or by pursuing an author to introduce legislation on behalf of the Governor. A year has passed since the work plan was submitted and we still do not know what priority components CDSS would include in a SAR proposal.

While we recognize that both the Governor and the legislature made decisions that have stalled progress, we believe CDSS should have done more to advance its vision for SAR.



The State Wasted Essential Federal Resources

As part of the Department of Defense (DOD) Appropriations Act of 2010 \$30 million in SNAP funding was allocated to supplement, not supplant, the program in California. The use of the DOD funds to implement SAR would have effectively met the intended purpose of the allocation; to "address the growing strain on existing resources related to administering SNAP". These funds would have more than sufficiently covered the upfront costs associated with the implementation of SAR and would have addressed one of the major concerns and barriers expressed with implementing SAR in 2010.

Despite USDA's efforts to explicitly connect use of these funds with the opportunity to move to simplified reporting, the Governor's budget proposal used these funds to replace previously allocated state food stamp funding, therefore backfilling the state General Fund. Furthermore, the state legislature was complicit with the proposal and maintained the proposal within the final state budget. We believe the state should have seized the opportunity to not only use these funds as intended, but also to commit these funds to a program improvement which has been shown to have positive impacts on recipients, as well as the administration of the program.

Recent Action

Nonetheless, we have not given up on supporting the implementation of a simplified reporting system, specifically SAR, in the near future. Therefore, with broad support from advocates across the state, Assemblymember Fuentes recently introduced AB 6. The bill



includes a proposal to implement SAR and provides the legislative vehicle essential to ensuring the necessary statutory changes and show a real commitment towards simplified reporting conversion. According to California's legislative calendar, final decisions regarding the success of AB 6 will be made at the latest by October 1st, 2011.

In support of AB 6 and SAR in general, we have formed the *Campaign for 6 Month Reporting*. The campaign is supported by a number of California advocates and emergency food providers. Because our primary goal is to support the implementation of SAR, we see further extensions of the current quarterly reporting waiver as counterproductive to our efforts.

To this end and with the current extension of the waiver set to expire in March of 2011, we would ideally request that USDA require California to move to SAR. Short of that, we believe that USDA has the authority to require that the state at a minimum follow federal law. **Considering the recent introduction of AB6 (Fuentes), we ask that you set a drop dead date of January 1st, 2012 by which California will no longer operate the current reporting waiver #2030030, and will either have SAR in state statute and have moved toward implementation or reprogrammed the current reporting systems to follow federal quarterly reporting law.**

Conclusion

We remain confident that a move to SAR is the right move for California now. With our current understanding of the positive impacts that simplified reporting can have on participation, program administration, and error rates, as well as with the continued need to alleviate the affects of a struggling economy and the subsequent hardships faced by many California families, we believe that California cannot wait any longer to make the change to simplified reporting. CalFresh must be efficiently and effectively operated for the benefit of both recipients and administrators.

Thank you for considering our request. We, the undersigned, are able to provide any additional information you may need. Please feel free to contact Jessica Jones (323-234-3030x172 or jjones@lafoodbank.org) or Renske Lynde (415-282-1907x262 or rlynde@sffb.org), co-chairs for the *Campaign for 6 Month Reporting* with any questions.

Sincerely,

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Paula James, Chair, Child Care Food Program Roundtable
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