



May 28, 2020

The Honorable Senator Anthony Portantino  
Chair, Senate Appropriations Committee  
State Capitol, Room 2206  
Sacramento, CA 95814

Dear Chairperson Portantino:

California Food Policy Advocates (CFPA), San Francisco-Marín Food Bank, AARP California, and the California Association of Food Banks are proud to co-sponsor SB 882, legislation that would simplify the CalFresh application for many older adults and people with disabilities, while also making permanent several key changes to increase access to CalFresh during the COVID-19 pandemic. SB 882 would eliminate burdensome, ongoing reporting requirements that cause many households to lose nutrition assistance, even when they remain eligible. SB 882 would also ensure that all applicants and participants can complete the application and recertification interview processes by phone, including submitting the required client signature.

Hunger and poverty are persistent problems in California that are being exacerbated by the COVID-19 public health emergency. Before the crisis began there were more than 4.1 million low-income households affected by food insecurity,<sup>1</sup> and the number of older Californians experiencing hunger continues to grow at an alarming rate. Nearly forty percent of low-income Californians over the age of sixty are food insecure -- a 21 percent increase over the last 15 years.<sup>2</sup> Food insecurity has significant negative impacts on older adults -- particularly on their health. Older adults who are food-insecure are more likely to die of a heart attack, have depression, and face limitations in activities of daily living. Food insecurity therefore places an already vulnerable population at increased risk for more serious health and economic hardships from COVID-19.

As a proven public positive public health intervention and powerful economic stabilizer, CalFresh has a critical dual role to play in California's immediate COVID-19 response and long-term recovery efforts.<sup>3</sup> Yet, in California, only 19 percent of eligible older adults (age 60 or over) are served by the program.<sup>4</sup> In fact, California ranks last in the nation when it comes to enrolling eligible older adults in CalFresh (or SNAP, as it is known federally).

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<sup>1</sup> CFPA Factsheet, <https://cfpa.net/GeneralNutrition/CFPAPublications/FoodInsecurity-Factsheet-2019.pdf>

<sup>2</sup> UCLA Center for Health Policy Research. (2001-2016) California Health Interview Survey Data. Retrieved from <https://healthpolicy.ucla.edu/chis/data/Pages/GetCHISData.aspx>

<sup>3</sup> Center on Budget & Policy Priorities, <https://www.cbpp.org/research/food-assistance/snap-is-linked-with-improved-nutritional-outcomes-and-lower-health-care>, <https://www.cbpp.org/blog/temporary-snap-benefit-bump-a-no-brainer-for-more-economic-stimulus>

<sup>4</sup> Food Research and Action Center and AARP Foundation, <https://frac.org/maps/seniors/senior-snap-rates.html>



In order to improve food security, reduce poverty and homelessness, and support California's recovery from the effects of COVID-19, it is critical that we simplify access to CalFresh for older adults and people with disabilities.

We applaud CDSS for having participated in a federal demonstration project called the Elderly Simplified Application Project (ESAP) since October 2017. The current ESAP package of federal waivers allows CDSS and County Welfare Departments (CWDs) to streamline enrollment, extend recertifications, and reduce the verification burden for ESAP-eligible senior and disabled households, which includes those composed solely of elderly and/or disabled members and who have no earned income. Approximately 495,000 households have benefitted from ESAP certification.<sup>5</sup>

SB 882 would require the state to adopt two additional elements for the ESAP. The first element is a waiver of the annual interim report (called a SAR-7) for ESAP households, which ESAP households are required to complete and submit each year. Unfortunately, some households fail to complete and submit the SAR-7 on time, and then are cut off from CalFresh and must reapply or lose food assistance altogether. Acknowledging this requirement as a barrier to benefit maintenance, the USDA Food and Nutrition Services (FNS) is allowing states to waive the interim report for all SNAP households during the COVID-19 pandemic. SB 882 would direct CDSS to seek authority from FNS to extend this waiver beyond the emergency for ESAP households. In states where FNS has approved the waiver of the interim annual report, advocates and state agencies have indicated that it is the most impactful element of the ESAP and a significant driver of higher retention rates, or reduced "churn,"<sup>6</sup> among ESAP households.

CDSS and CWDs have prioritized the reduction of CalFresh caseload churn both because "the disruption in benefits creates a temporary hardship for participants and creates administrative burden for CWDs."<sup>7</sup> Removing the annual reporting requirement for ESAP households would result in significant administrative cost savings over time. Pages 277-279 of the [2019-2020 State Budget Local Assistance Estimates](#) include cost and savings estimates for implementing the ESAP demonstration project. The analysis estimates the state "cost to process an annual or semi-annual SAR 7 report to be \$15.25. (p. 278). If that cost savings were multiplied by the number of ESAP households (estimated 500,000, and growing) it would save \$7,625,000 in administrative costs annually. Eliminating the annual report would also allow counties to redirect staff capacity to process additional new applications, improve timeliness and accuracy, and more thoroughly vet applications for allowable deductions to maximize households' monthly benefit allotments. At a time when application volume is elevated, improving CWDs operational efficiency is paramount. Removing unnecessary administrative tasks like the SAR-7 for ESAP households is a smart and cost-effective

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<sup>5</sup> See CDSS First and Second Year ESAP Reports, submitted to USDA FNS, available at <https://cfpa.net/CalFresh/ExternalPublications/CDSS-CA-ESAP-First-Annual-Report-FINAL.pdf> and <http://cfpa.net/CalFresh/ExternalPublications/CA-ESAP-Second-Annual-Report-12.19.19-FINAL.pdf>

<sup>6</sup> CalFresh caseload "churn" happens when an eligible recipient unexpectedly loses CalFresh benefits, usually because of missed reporting requirements, only to re-enroll within one to three months.

<sup>7</sup> CDSS All County Letter No 18-117, available at <https://www.cdss.ca.gov/portals/9/acl/2018/18-117.pdf>



way to “do more with less” while simultaneously improving client customer service and outcomes.

The second ESAP element SB 882 calls for is a simplified application for initial enrollment. The current CalFresh application — [the CF 285](#) — is a complex, 18-page document. It can be challenging and intimidating for anyone — and particularly for older adults and persons with physical or developmental disabilities, it can be a major barrier to participation. Though we applaud the success of online application portals like GetCalFresh.org, we also consistently hear from stakeholders that older adults want the option of completing a paper CalFresh application. Many low-income older adults lack reliable internet access and/or do not feel comfortable sharing personal information online. SB 882 would direct CDSS to simplify the paper CalFresh application for ESAP households by removing questions that are irrelevant to those households’ circumstances, such as those about earned income. We do not need further federal waiver approval to implement a simplified application—this is a state option.

Apart from the two additional ESAP elements, SB 882 would also ensure that all applicants and participants can complete the application and reporting processes by phone, including the required client signature. Pandemic conditions have forced the two-thirds of California counties without telephonic/electronic signature capacity to implement emergency workarounds to provide remote services to communities facing unprecedented need. Those workarounds are possible due to expanded flexibility provided through temporary federal waivers, scheduled to expire on June 30.<sup>8</sup> While telephonic/electronic signature is a critically important capacity for CWDs during COVID-19, this has been a long-standing need for many low-income older adults and persons with disabilities without reliable internet access. The recent expansion of CalFresh eligibility to SSI recipients was facilitated by a multi-stakeholder process with counties, CDSS and advocates. That process produced a number of recommendations for county business processes. The [number one recommendation was to allow for telephonic/electronic signature](#) of the application.

We know that counties can implement telephonic/electronic signature, as more than 20 counties have already done so without major fiscal cost or disruption to staffing and business processes. And other states, (e.g. Nebraska), have implemented telephonic/electronic signature in a cost-effective manner and that also allows the state SNAP agency to provide telephonic signature capacity to a neighboring state (Iowa). CalFresh clients should have that same level of access and customer service, regardless of where they live.

By enacting all available ESAP policies that simplify access and enhance retention in CalFresh, and by ensuring full access by telephone statewide, we can maximize the opportunity to provide long-sought food assistance to our state’s most vulnerable residents—now and in the wake of COVID-19.

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<sup>8</sup> All County Welfare Directors Letter, May 28, 2020, available at [https://mcusercontent.com/73901133dd7ea1a5581344daf/files/44a615f8-3542-497f-9bd4-25ddad557af7/ACWDL\\_5\\_28\\_20\\_.pdf](https://mcusercontent.com/73901133dd7ea1a5581344daf/files/44a615f8-3542-497f-9bd4-25ddad557af7/ACWDL_5_28_20_.pdf)



The need for SB 882 is urgent and clear:

- **California has persistently lagged behind the rest of the nation when it comes to connecting low-income seniors with CalFresh.** Only 19 percent of eligible adults over age 60 participate in CalFresh—the worst SNAP participation rate of any state. In order to reduce food insecurity and provide more economic stability in the face of the COVID-19 emergency and its aftermath, it is critical that we simplify access to CalFresh for older adults and people with disabilities now.
- **The need to streamline CalFresh application processes is more urgent than ever.** The number of new CalFresh applications is surging due to the economic downturn and unprecedented unemployment. Weekly CalFresh application volume at the end of March 2020 was more than double that of one year prior,<sup>9</sup> and the spike in application volume shows no sign of tapering off in the near future. With state, county, and outreach partner capacity stretched to the limit, operational efficiency is the top priority, as reflected in the federal waivers the state is now implementing. In order to address the tremendous need brought on by the crisis and support the recovery effort, it is vital that the state extend CalFresh policy and business process flexibilities wherever possible. The state can also realize significant administrative cost savings by removing unnecessary reporting requirements like the annual report for ESAP households.
- **CalFresh access and customer service varies significantly across the state,** leading to major inequities. Enrollment processes are often burdensome, especially for older adults, non-English speakers, and the working poor. Regardless of where they live or their individual circumstances, all eligible Californians should have equitable access to vital food assistance needed to live healthy, productive lives. This includes having the option to complete the application and reporting processes completely by phone, as clients in only one-third of counties currently can, and as is temporarily statewide available due to new federal waivers meant to ease access during the COVID-19 emergency.
- **CalFresh helps our communities thrive.** In 2016, Over 1.7 million Californians missed out on the nutrition benefits of CalFresh. If all those eligible were enrolled, the state would have garnered nearly \$2 billion more in federal dollars annually, generating over \$3 billion in economic activity annually.<sup>10</sup> With caseloads rapidly growing, closing the CalFresh participation gap can help meet our shared goals of improving public health and stimulating economic activity.

As the COVID-19 crisis continues to make clear, meeting the nutritional needs of low-income

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<sup>9</sup> CDSS Research and Data Reports, COVID-19 Safety Net Weekly Applications, available at <https://www.cdss.ca.gov/inforesources/research-and-data>

<sup>10</sup> CFPA, *Lost Dollars Empty Plates 2019*, <https://cfpa.net/CalFresh/CFPAPublications/LDEP-FullReport-2019.pdf>



households is an urgent and ongoing need. No one should go hungry in the great state of California, and it is our collective responsibility to use all the tools we have to make it easier for food-insecure older adults and people with disabilities to access our most powerful anti-hunger tool, CalFresh. We urge your support for this critical and timely legislation.

Sincerely,

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California Food Policy Advocates

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