



**JUSTICE IN AGING**  
FIGHTING SENIOR POVERTY THROUGH LAW



February 9th, 2022

Kimberly Johnson  
Director, California Department of Social Services  
744 P Street  
Sacramento, CA 95814

**Re: CalFresh Elderly Simplified Application Project (ESAP) – Advocate Request to Include Children in ESAP-eligible Households.**

Dear Director Johnson:

Nourish California and the undersigned organizations write to urge the CDSS to request a simple but impactful change to the current CalFresh Elderly Simplified Application Project (ESAP) waiver. We strongly urge you to request from the USDA Food and Nutrition Service (FNS) an amendment to the state’s ESAP that would allow children to be included in ESAP-eligible households.

The Elderly Simplified Application Project (ESAP) has been shown to increase CalFresh applications and participation while reducing administrative burden and churn<sup>1</sup> – outcomes which are consistent with the goals of the Department and CalFresh Branch. The newest elements of ESAP will further these goals by 1) creating a simpler, shorter

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<sup>1</sup> “An Advocate’s Guide to the Elderly Simplified Application Project,” Benefits Data Trust, 2017, available at: [https://bdtrust.org/3.3.17-ESAP-TA-Guide\\_E.pdf](https://bdtrust.org/3.3.17-ESAP-TA-Guide_E.pdf)



application<sup>2</sup> (enacted through the State Budget Act of 2021-22) and 2) waiving annual report requirements for ESAP households.<sup>3</sup>

These positive policy changes will continue to improve CalFresh access for older adults and people with disabilities. By going even further and including children in the ESAP, the state would expand the number of ESAP-eligible households. Potentially tens of thousands of additional California households and applicants will experience the reduced administrative burden from the simpler application and reporting process allowed under ESAP rules.

ESAP-eligible households are currently defined as those solely composed of Elderly (age 60+) and/or disabled members with no earned income. FNS has recently approved ESAP waivers in other states that also include minor children in ESAP households. The inclusion of children, who obviously have no countable earned income, allows households headed by older adults or people with disabilities that have minor dependents to enroll under ESAP, significantly expanding the number of households that have a lower administrative burden and lowering the cost per Non-Assistance CalFresh case.

Hunger among older Americans is disproportionately felt by Black and Brown elders. According to a recent study by the AARP Public Policy Institute, “Pre-pandemic, older Black Americans faced food insecurity at nearly three times the rate of their White counterparts. Now the difference is four-fold. Between 2019 and 2020, food insecurity

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<sup>2</sup> AB 135 (2021), Human Services Omnibus, Section 77, available at [https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill\\_id=202120220AB135](https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220AB135)

<sup>3</sup> All County Letter 20-145, December 29, 2020, available at <https://www.cdss.ca.gov/Portals/9/Additional-Resources/Letters-and-Notices/ACLS/2020/20-145.pdf>



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among older Black adults increased 4 percentage points, even as it decreased slightly among older White adults. Food insecurity also edged up among older Hispanic and Asian Americans, though nearly three times as many Hispanic older adults experience food insecurity as their Asian counterparts.”<sup>4</sup>

We have attached for your reference the waiver request from New York State and subsequent FNS approval notice. Included in this request are the Federal Regulations that were waived, which are identical to California's most recent ESAP waiver approval. The FNS approval simply states that “children can be present in the household” (see page 3 of New York waiver approval letter). No additional regulation need be waived. Nourish California and the undersigned organizations urge you to contact FNS at your earliest convenience to request the same inclusion of minor children in ESAP households in our state.

We are in the process of analyzing available data to estimate the number of households that would benefit from this waiver authority extension (namely households with elderly or disabled members as the primary caretakers for minor children). We are happy to share those estimates with your office as soon as possible, but did not want to delay bringing this request forward because we firmly believe it will be a worthwhile change that will increase CalFresh access while bringing administrative cost savings to the state.

Thank you for your many recent actions to improve CalFresh access for older adults and people living with disabilities, and for your consideration of this request. Please feel free

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<sup>4</sup> AARP Public Policy Institute analysis of Current Population Survey Food Security Supplement, available at <https://blog.aarp.org/thinking-policy/pandemic-widens-food-insecurity-disparities-among-older-adults>



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**Children  
Now**



**CALIFORNIA  
ASSOCIATION OF  
FOOD BANKS**



**SF-MARIN  
FOOD BANK**

to contact me at [jared@nourishca.org](mailto:jared@nourishca.org) should you have any questions or need any additional information.

Sincerely,

Jared Call  
Senior Advocate  
Nourish CA  
[jared@nourishca.org](mailto:jared@nourishca.org)

California Association of Food Banks  
Children Now  
Justice in Aging  
San Francisco-Marín Food Bank



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