



# CWDA

June 19, 2015

To: Honorable Members  
National Commission on Hunger

From: Cathy Senderling-McDonald  
Deputy Director, CWDA

Re: June 15, 2015 Commission Hearing – Written Testimony

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Honorable Commission Members:

Thank you for the opportunity to submit this written testimony on behalf of the County Welfare Directors Association of California (CWDA) in support of my on-site testimony on Monday, June 15, 2015 at the Commission hearing in Oakland, Ca.

CWDA is a statewide non-profit organization representing the appointed human services directors in all 58 of California's counties. In addition to responsibility for initial eligibility determinations and ongoing case management for the SNAP program (known as CalFresh in California), counties also have responsibility for eligibility and case management for our TANF program (CalWORKs) and our Medicaid program (Medi-Cal), in addition to administering the child protection and adult protective systems and a large in-home services program for children and adults who need assistance with daily living activities. CWDA represents the county human services agencies on legislative, budgetary and regulatory matters at both the state and federal level.

Our association, in existence since 1926, has a strong focus on reducing economic inequality and reducing poverty, especially deep poverty, among the families we serve. Children who experience the toxic stress of deep poverty are more likely to experience health and physiological problems than those who do not and are more likely to be burdened with cognitive deficits and a reduced ability to cope with challenging situations. This leads to lower educational attainment and lower levels of employment than their peers who did not grow up in poverty.

#### Overview of SNAP in California

Counties deploy thousands of trained eligibility workers at hundreds of local offices across the state to serve clients in need. In addition to in-person service, we also offer online, mail-in and phone-based customer service to our customers. A single online portal, [www.benefitscal.org](http://www.benefitscal.org), is available to point Californians to a locally supported online application, and county staff utilize an integrated eligibility system, the Statewide Automated Welfare System (SAWS) that provides eligibility determinations for SNAP, TANF and Medicaid, as well as other programs for low-income families and individuals.

In California, SNAP was responsive during the recent recession. During the two-year period immediately following the official start of the recession in December 2007, to December 2009, the caseload grew by a million people – from 2.2 million to 3.2 million recipients. By December 2014, the caseload had doubled from its December 2007 level, to 4.4 million. In absolute terms, California was one of the states with the highest growth in recipients during the recession (we believe second only to Florida in caseload growth, based on a federal data review).

The continued increase in caseload to December 2014 stems from a variety of factors – including continued high demand for these benefits, coupled with simplification efforts and efforts to reduce turnover, or “churn,” in the caseload. For example, counties have harnessed technology to offer more options for customers to provide information, such as a recently deployed application in Los Angeles County that enables documents to be uploaded to a customer’s case file via their mobile device. During the recession, some counties also added kiosks in their lobbies, supported by a staff person who could answer questions, to allow documents to be scanned in, aimed at those customers who needed only to drop off needed verifications or other documents. This freed up worker time for more complex casework and reduced the length of time customers needed to wait to conduct a relatively simple transaction. Counties, with support of the state and advocates, have also moved toward greater use of telephone interviews (vs face to face) and the state has moved from a system of monthly income and change reporting to a semiannual reporting requirement.

### **What More Can be Done to Increase Participation and Reduce Hunger?**

Despite the significant increase in California’s caseload in absolute terms, the rate of participation among eligible individuals remains below average. Additionally, we know that hunger persists, despite participation in the program, for many of our customers – a 2013 USDA study found that 54.2 percent of SNAP recipients still reported experiencing food insecurity. As noted by speakers at the Oakland hearing, we first implore that you do no harm to the current program. Changes have been contemplated in recent years that would limit the ability of states to provide necessary benefits to all eligible families who apply, or that would limit the use of benefits, rather than providing nutrition education to families receiving SNAP and working to ensure healthy food choices are available to all, regardless of their address.

We note that participation is generally a function of two things – the number of applications received and processed and the level of churn in the caseload. We have recommendations in both of these areas.

1. Applications – With regard to increasing the number of eligible Californians applying for SNAP, we offer the following suggestions for the federal government:
  - *Support continued simplification in submission of applications.* For example, under the Affordable Care Act, states now have the option of providing “express lane” eligibility for Medicaid to individuals who are receiving SNAP benefits, an option that California exercised to target the estimated 600,000 adults and 150,000 children who are receiving SNAP but are not enrolled in Medicaid. As of mid-June, about 188,000 Californians had taken advantage of this enrollment option and were receiving Medicaid coverage through this simplified route.

We encourage Congress and the USDA to authorize an “express lane” option for families already receiving Medicaid, to allow for simplified enrollment into SNAP for these known-eligible individuals.

- *Support state and county efforts to reach underserved groups.* We know that seniors who are not receiving SSI benefits are an underserved group, as are former foster youth who have emancipated from care. An example of a recent effort in California that has not moved forward due to federal roadblocks is the implementation of California’s AB 719 (Statutes of 2009), that sought a waiver to enable counties to take a SNAP application from a foster youth as he or she was nearing emancipation from care, but delay the processing of it until the youth was leaving care so the benefits could start at the same time as their emancipation. The waiver request was not granted by the USDA, and an attempt to create a demonstration project to test the effects of the proposed changes was also unsuccessful because the state could not meet the “cost neutrality” argument – the purpose of the effort was to increase participation among young adults who would not otherwise receive these benefits, an inherent cost. Finding a way to support efforts such as these is crucial to targeting outreach efforts and increasing participation rates among underserved groups.
  - *Make use of available technology to simplify processing.* For example, the ACA required the federal government to create a new federal hub that allows for electronic verification of immigration/citizenship information and income data reported by Medicaid and Exchange applicants. Even though many families are applying for multiple programs – not just health coverage – when they make contact with the county human services agencies, states are prohibited from using the federal ACA hub data for any non-health purpose. This means that families may be found eligible very quickly and with minimal paper-based verification for health coverage, while their SNAP (and TANF) cases are delayed until paper is provided. Opening the federal hub to appropriate human services use would be a significant step toward simplifying efforts to enroll more eligible families and ensuring a common experience across the programs.
2. Churn – With regard to reducing turnover among already enrolled individuals and families, we offer the following suggestions:
- *Alignment across programs* – There are efforts in California (and, we assume, other states) to align annual redetermination and other reporting activities across programs so that information need only be provided once to the greatest extent possible. Again taking a page from the ACA, we recommend exploration of a rolling system whereby eligibility redeterminations that occur during the year (as a result of reported income changes or other changes that the county becomes aware of) could be used to re-set the recipient’s eligibility for a new 12 month period. This is consistent with new ACA rules that allow resetting of Medicaid eligibility periods when eligibility is redetermined during the year.

- *Supporting use of technology to reduce churn* – We appreciate the competitive SNAP Process and Technology Improvement Grants that the USDA offers. More can be done, however, to support innovations in this area. The federal government should make funds available to states and counties that seek to enhance their customer service through the use of technology, both for the creation as well as the replication of these efforts. For example, in California, the County of San Francisco and Code for America partnered to create the Promptly app, which sends reminders and alerts to SNAP recipients when they need to provide information to the county but have not yet done so, and thus are in danger of being discontinued from the program. The discontinuance rates have dropped among those using this app. Additional counties are interested in using the app, but funds are limited and not every interested county is able to take part in the next phase. Increased support from the USDA for these types of efforts would help to encourage innovation and expand the use of new ideas that have already been created.

With regard to reducing hunger, the general question is whether benefit levels are sufficient, when taken into consideration in conjunction with other available programs such as the National School Lunch Program, to offer families participating in SNAP an acceptable level of food security year-round. To this end, we offer the following suggestions:

- Work to expand awareness of and enrollment in the Summer Meals Program, as well as the National School Lunch and Breakfast Programs.
- Increase SNAP benefits during summer months, when children are not in school. The USDA did a demonstration project on this concept that showed positive outcomes.
- Reassess benefit adequacy and update the benefit formula. The formula was established in the 1960s and it should be revisited and its assumptions updated; the formula should also take into account regional food cost variation and differences in the overall cost of living.

#### **SNAP's Role in Improving Economic Security**

Finally, we offer some thoughts about the role that SNAP, and other government services, may play in reducing income inequality. It is clearly not enough to provide someone with a monthly food benefit to patch their meager income and expect them to thrive as a result. Accountability is very important, but many of the outcomes we seek – a true reduction in poverty, and especially deep poverty – require a cross-agency effort and, thus, cross-agency outcome measures.

We have many suggestions, most of which go beyond the direct charge of the commission, on how to reduce poverty and inequality. A few to point out include:

- Expand subsidized employment opportunities, both through TANF and the Workforce Investment Opportunity Act (WIOA), to increase household income and transferrable skills.
- Increase the Earned Income Tax Credit, including for non-custodial fathers, thus keeping more earned income in the pockets of families and those responsible for children.

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- Increase the availability of high quality center-based child care. Research shows that there are higher rates of food insecurity among preschoolers who are cared for by friends or relatives rather than in a child care center.

In conclusion, we very much appreciate the opportunity to testify at the National Commission on Hunger hearing and to submit this testimony for the record. County human services agencies look forward to continuing our partnership with your commission, the federal government, the state and the numerous client advocates with whom we work closely in California and at the federal level to advocate for inclusive and effective policies in SNAP and the other programs we administer.