



May 8, 2018

The Honorable Mike Conaway
Chair, House Agriculture Committee

The Honorable Collin Peterson
Ranking Member, House Agriculture Committee

The Honorable Kevin Brady
Chair, House Ways and Means Committee

The Honorable Richard Neal
Ranking Member, House Ways and Means Committee

Dear Chairmen and Ranking Members:

RE: SNAP PROVISIONS IN THE FARM BILL - OPPOSE

The California State Association of Counties (CSAC), County Welfare Directors Association of California (CWDA) and County Health Executives Association of California (CHEAC) strongly oppose a number of the Supplemental Nutrition Assistance Program (SNAP) provisions in the Farm Bill (H.R. 2). The proposed policies punish families and will place enormous new administrative burdens on county governments.

Our organizations are all statewide associations representing the elected county Boards of Supervisors (CSAC) and directors of public human services departments (CWDA), in all 58 of California's counties, and public health departments (CHEAC) in all 58 counties and three cities. In California, counties provide public assistance services, child welfare services, public health services, and services to senior and people with disabilities. Specific to the Farm Bill, counties act on behalf of the state to determine eligibility and provide case management for CalFresh, the state's SNAP program and also directly receive funding to provide SNAP-Ed services.

Our specific objections to the legislation follow.

The Proposed Eligibility Policies Punish Low-Income Families

SNAP's mission is to reduce food insecurity. County human services administrators and our

staff are committed to moving adults and their families into gainful employment and economic self-sufficiency whenever possible. However, until such time and often afterwards, programs such as SNAP are critical to ensuring that these individuals do not go hungry.

The provisions in the Farm Bill, however, move SNAP in the wrong direction. Instead of reducing food insecurity, the policies will increase it for many families. The bill would severely restrict the administrative flexibility California and its counties use to determine whether working families qualify for CalFresh by limiting categorical eligibility to whether the family is receiving Temporary Assistance for Needy Families (TANF) cash assistance or other TANF-funded services. It also reduces the ability of states and counties to raise asset limits – ironically, moving away from states’ efforts to incentivize working individuals to continue to do so and pay for necessary child care and other bills which enable them to work.

The legislation also would cut benefits to non-elderly households with high housing and utility costs through eliminating the state option to streamline eligibility by using the receipt of Low Income Home Energy Assistance (LIHEAP) benefits as a means to reduce food insecurity. De-linking LIHEAP from the Standard Utility Allowance (SUA) would require hundreds of thousands of California households to provide utility receipts to our county agencies in order to receive the deduction.

Without these provisions described above, many families will face an income eligibility ‘cliff’ much more quickly as they increase their earnings. These proposed Farm Bill policies do not support families’ efforts to become economically independent. In fact, the Congressional Budget Office (CBO) estimates that the combined cost of the loss of these administrative provisions alone will result in the loss of over \$10 billion in food assistance over ten years – an essential support to allow households to focus on work instead of whether they are able to feed their family. This bill would increase hunger and food insecurity nationwide.

The Proposed Eligibility Provisions Create New Administrative Burdens

Previous bipartisan bills enacted into law recognized that program rules were unnecessarily complex for agencies administering SNAP. Those measures provided states with options to simplify bureaucratic measures to determine eligibility. The vast majority of states chose to avail themselves of those options. The proposed administrative restrictions outlined in the previous section of this letter will only serve to increase county, state and federal eligibility determination costs and may increase administrative errors with no cost savings other than families losing all or a portion of their food assistance benefit.

Onerous New Work Requirements Penalize Hard-Working Families

Most SNAP households can and do work. The basic premise underlying the punitive work requirements supports the false narrative that households don’t work because they would rather have a relatively small food benefit. For most households, SNAP is a short term benefit. The bill imposes an extremely harsh penalty on all ‘work-capable’ adults who go more than

one month without working or participating in work programs 20 hours a week. If there is any decrease in the number of hours due to illness, the inability to get to work because of unreliable transportation, the unreliable nature of scheduling at hourly retail and service sector work that many of our households obtain, or the employer's decision to decrease the work hours available, the individual loses SNAP benefits for one year. The penalty increases to a three-year bar for any subsequent inability by the individual to demonstrate that they indeed have met the work requirement. CBO estimates this policy will result in a loss of \$9.2 billion in food assistance over a ten year period because individuals will not be able to comply consistently with the new mandates. Those costs do not include the anticipated significant increase in state and county costs to track each month the millions of individuals who are subject to the new requirements.

The Enhanced Employment & Training Program is Woefully Underfunded

To support the work requirement expansions, the bill ultimately provided \$1 billion annually to states to launch massive new SNAP Employment and Training (SNAP E&T) programs. Presently, 33 California county human services agencies have opted to participate in the CalFresh E&T program. The \$1 billion in federal E&T funding is totally insufficient. In fact, the California state legislature in 2015 estimated that it would cost \$1 billion for this state alone to operate a program solely available for the subset of recipients who are Able Bodied Adults Without Dependents (ABAWD). To provide additional context for this unrealistic and unworkable proposal, the U.S. Department of Labor reports that the nation's Workforce Innovation and Opportunity Act (WIOA) program trained 153,000 adults in 2015. Those numbers pale in comparison to the estimated 3 million or more individuals who would need work slots under the House measure - amounting to a federal contribution of \$30 per person per month.

The Bill Dismantles California's SNAP-Ed Infrastructure

SNAP-Ed services play a critical role in empowering those receiving and/or eligible for SNAP benefits to live healthier lives through the promotion of healthy food choices and physical activity. Currently, SNAP-Ed services, such as nutrition education, healthy food access, and physical activity and obesity prevention programming, are delivered through nearly 11,000 community-based sites contracted through the California Department of Public Health and local health departments throughout the state. This arrangement allows our state to more effectively reach eligible SNAP-Ed beneficiaries and reduce service gaps across California's diverse landscape.

The partnership between the State and local health departments is crucial as local health departments have strong expertise in addressing policy, systems, and environmental change and are well-known and trusted entities in every California community. The bill's proposed modifications to SNAP-Ed would shift funding away from state and local agencies to land grant universities and would dismantle critical SNAP-Ed services delivered at the local level through unique community-based and multi-sectoral partnerships.


Conclusion

As our members work with persons needing government assistance to overcome food insecurity, it is very clear that those striving to find employment face more barriers than having the right skills to match available jobs. The vast economic and demographic diversity of California means that what may work in one county will not be feasible in another. In our more rural counties, the lack of public transportation and/or the individual’s financial resources to own and maintain a car is often a huge barrier to seeking and maintaining employment. The lack to access to technology, including computers and the skills or knowledge to find and apply for a job is also a barrier. And, our state has some of the highest housing costs in the nation. The unavailability of affordable housing leads all too often to the inability to maintain a permanent living arrangement from which to travel to and from work.

These realities speak to the need to *maximize* flexibility for counties and states, *eliminate* punitive time limits on SNAP households, and expand and enhance SNAP E&T program resources in a *thoughtful and meaningful* way. The bill as currently drafted does not accomplish any of those goals.

CSAC, CWDA and CHEAC urge you to reject the harsh provisions outlined above and offers our county directors as resources to guide you further in improving SNAP and its related services.

Sincerely,



Justin Garrett
Legislative Representative | CSAC



Michelle Gibbons
Executive Director | CHEAC



Frank Mecca
Executive Director | CWDA

cc: California House Delegation