



CWDA

Advancing Human Services
for the Welfare of All Californians

May 16, 2026

To: The Honorable Caroline Menjivar
Chair, Senate Budget Subcommittee No. 3

Honorable Members
Senate Budget Subcommittee No. 3

The Honorable Dr. Corey A. Jackson
Chair, Assembly Budget Subcommittee No. 2

Honorable Members
Assembly Budget Subcommittee No. 2

From: Carlos Marquez III, Executive Director, CWDA

RE: PREVENT HUNGER & PROTECT CALFRESH FROM H.R. 1 CUTS &
EMERGING RISKS

The County Welfare Directors Association of California (CWDA) respectfully submits our response to the following CalFresh-related proposals in the May Revision and analysis of other critical emerging CalFresh risks for counties and the 5 million Californians who rely on the program:

- **Issue 1:** Impacts and implementation of H.R. 1 work requirements amidst drastic reduction in base CalFresh administrative funding
- **Issue 2:** Proposed cost shift for federal State Administrative Expense (SAE) target
- **Issue 3:** Need for temporary match waiver relief for administrative cost shift under H.R. 1
- **Issue 4:** Mitigating Pre-H.R. 1 county CalFresh penalties for H.R. 1 implementation outside of counties' control

These challenges facing CalFresh administration are not isolated issues; together,

they threaten counties' ability to effectively deliver nutrition assistance to vulnerable Californians in the face of the hunger crisis threatened by H.R. 1 without comprehensive action in the final Budget. The expansion of ABAWD requirements under H.R. 1 with proposed dwindling administrative resources, concerns related to the federal SAE target, increases in the CalFresh county match, and heightened PER fiscal exposure collectively create significant uncertainty and strain on county operations at a time of already extreme workload demands that will exacerbate risks to clients.

CWDA urges the Administration and Legislature to act on these proposals to support counties and avoid unnecessary yet potentially significant disruptions to client access and program integrity.

Issue 1: May Revision On Net Reduces Rather than Augments Resources for the County Eligibility Workforce Necessary to Prevent Widespread Benefit Loss and Hunger

On June 1, CalFresh eligibility workers need up to 4 hours per person a year to help 805,600 Able-Bodied Adults Without Dependents (ABAWDs) keep their CalFresh food aid in response to the draconian and regressive cuts and policies of H.R. 1. Even with data-driven exemptions, workers will face an overwhelming workload surge that is already causing eligible children and households to lose food in states attempting to preserve access like Massachusetts. The 80,000-household decrease in Massachusetts, which includes nearly 50,000 children, is striking, and includes eligible families who shouldn't have been terminated.¹

If adequately funded, staffed, and trained, the county eligibility workforce offers a clear, cost-effective, and proven pathway for the State to reduce the harms of H.R. 1 by keeping as many people as possible connected to food assistance and mitigating an emerging hunger crisis.

¹ <https://www.bostonglobe.com/2026/05/01/metro/snap-benefits-lost-calls-disconnected/>

County staffing investments have been found to:

- Reduce churn among otherwise eligible clients by 35% (CalFresh)
- Increase program participation by more than a third (CalFresh)
- Improve reengagement of at-risk clients with complex needs by up to 45% (Welfare-to-Work)

Conversely, when surveyed about the impacts and risks of inadequate funding:

- 100% of counties anticipate increased processing delays and reduced client engagement
- 85% of counties cited reduced exemption screening capacity as an impact
- Nearly 100% of counties cite complexity around requirements and client confusion as anticipated challenges related to inadequate administrative funding

May Revision Falls Far Short of Needed Investment in this Proven Retention Pathway

While CWDA appreciates the modest one-time investment to support clients impacted by H.R. 1 ABAWD work requirements, the Administration's proposed funding level and duration of investment is woefully insufficient to meet the significant new workload counties will face to protect clients' access to CalFresh food benefits. Retaining benefits for this population hinges on counties' ability to conduct timely, repeated, and robust exemption screening and client education and engagement—yet the May Revision includes only a fraction of the resources needed for counties to appropriately and equitably implement H.R. 1, and proposes no ongoing commitment despite counties needing to build the workforce necessary to administer H.R. 1 requirements.

Importantly, the May Revision in effect leaves counties worse positioned to meet the stakes of H.R. 1 as it reduces counties' base CalFresh funding by \$119 million General Fund (relative to Governor's Budget) due to the caseload forecast for FY 2026-27. Adjusting for the administrative cost shift pursuant to H.R. 1, this roughly equates to nearly a 13% reduction in counties' base CalFresh funding from FY 2025-26 to FY 2026-27—which would place over 450 FTEs statewide at-risk, and noting, which is nearly the same level of *new* staffing estimated to be needed for H.R. 1 requirements. In other words, the Administration's proposed reduced base

funding when combined with inadequate ABAWD funding augmentation means that counties will be short at least the equivalent of 717 FTEs to implement H.R. 1 responsibly and consistent with state guidance and federal rules.

The May Revision proposes \$61.9 million total funds (\$30.0 million General Fund) one-time in FY 2026-27 to augment CalFresh administration. CWDA estimates approximately \$213.6 million total funds (\$103 million General Fund) in FY 2026-27, and \$110.3 million total funds (\$58 million General Fund) in FY 2027-28 and ongoing is required to hire up to 400 FTEs that are needed to meet the mandate with a harm-reduction-oriented approach at the forefront, as required by state guidance. We underscore the need for **ongoing investment** given the “new normal” of additional eligibility workers required to sustain CalFresh retention and prevent hunger under H.R. 1. Counties

The Administration’s short-term and inadequate funding approach fails to match the sustained nature of resource needs associated with the magnitude and complexity of H.R. 1, placing counties in the untenable position of either hiring new workers at the risk of laying them off a year later, or not hiring at all. Counties must be positioned to hire and train permanent staff given new ongoing workload obligations, as required by H.R. 1 and California Department of Social Services’ (CDSS) guidance. Absent a sustained funding commitment, counties will face both unsustainable workload demands and a potential looming funding cliff, creating operational instability, staff turnover, reduced customer service capacity, and a heightened risk of errors.

Moreover, the funding that is proposed is framed as “bridge funding” until the next CalFresh administrative rebase (set to be evaluated in FY 2026-27 and potentially adopted in FY 2027-28) despite the fact that clients and the eligibility system will be stress tested and exposed to risk as soon as two weeks from now, and continue to be stress tested in the upcoming budget year. Delaying a long-term funding solution will leave counties without the certainty needed to adequately prepare and will inevitably result in avoidable disruptions for eligible households, including delays in processing, and unnecessary loss of access to nutrition assistance benefits. Counties need durable, ongoing funding now—not temporary bridge resources that increase the likelihood of harm to clients. Especially since there is no guarantee the outcome of the administrative rebase effort will yield a proposal by the Administration based on those findings.

As noted above, we highlight this augmentation is offset, nearly 4 times over, by a significant reduction in base CalFresh administrative funding of \$119 million General Fund, or nearly 13% of the existing CalFresh administrative allocation, due to projected baseline caseload declines. We plan to engage the Administration to better understand the source data and time period informing the caseload trends. However, **given the volatility and uncertainty in the coming year as a result of H.R. 1 and the federal environment, reducing counties' base funding so aggressively now creates significant and unnecessary risk and will force counties to make difficult tradeoffs all while trying to mitigate consumer impacts as a result of H.R. 1.**

Automation complements—not replaces—necessary county staffing resources.

Background: CDSS' Data Sharing & Impacted Populations

CDSS has indicated that they are planning to use a combination of existing point in time information, as well as administrative data to automatically exempt individuals from the time limit, phasing in over time.

- At June 1 implementation: CDSS has indicated that they will be able to auto-exempt 1.6 million individuals based on January 2026 point-in-time data, or approximately two-thirds of the 2.4 million Californians deemed Able-Bodied Adults Without Dependents, with approximately 805,600 CalFresh recipients estimated to require full worker screening for exemptions and potential compliance in order to maintain eligibility. We note the Budget projects that 70% of these individuals—or 561,000 low-income Californians—are assumed to lose access to their CalFresh. Given the net reduction in the May Revise, we also note that any exemptions or compliance verifications assumed in CDSS' 30% retention estimate among those who will require manual work may not be fully achievable, but that with adequate funding, CWDA views a retention of 30% as a floor among this population.
- Summer/fall data sharing: CDSS has indicated that they are working on securing additional data sources to auto-exempt individuals within the 805,600 adults they previously estimated would be subject to the time limit. DSS has said this includes potential data from DHCS and DDS, and that the aim is to have this information available for CalSAWS to auto-exempt individuals with more permanent exemptions, including those related to disability, caregiving responsibilities, and individuals deemed obviously unfit

for work, prior to the first cohort of individuals subject to the 3-month time limit being discontinued at the end of August. CDSS has also indicated that they are working on administrative data integration opportunities, including IHSS provider and consumer information, but has not provided a timeline. At this time, CDSS estimates that approximately 150,000 to 200,000 additional adults could be exempt based on the data match with DHCS and DDS. This means at least 600,000 individuals would still be significantly at-risk of losing their benefits absent adequate administrative funding.

We continue to appreciate the robust cross-agency data-matching efforts being pursued by CDSS to identify and automate some exemptions, for example by way of data sharing with Medi-Cal. However, even under the most aggressive automation timelines, implementation of some of these data-matching interventions may not occur in time to align with the recertification schedules of all ABAWDs impacted by H.R. 1. For example, as additional exemptions are identified through data matching over the course of the budget year, clients with recertification dates later in the first year of implementation may face a lower risk of losing benefits than those scheduled to recertify earlier in the year. This creates a significant inequity driven by arbitrary recertification timelines that are entirely outside of a client's control.

The only meaningful way to maximize mitigation of this risk is to ensure counties have adequate upfront staffing and resources to help all impacted ABAWDs identify potential exemptions and connect with qualifying activities before benefits are unnecessarily discontinued. Moreover, county experience shows that clients are highly responsive to individualized, human-driven engagement. County experience also shows that automation improvements are inherently iterative. System updates are rolled out in phases, tested by eligibility workers, refined based on the observations from the real day-to-day use, and then adjusted again.

Automation can initiate engagement or identify and record certain exemptions, but staff are required to resolve issues, answer questions, and finalize eligibility, making direct contact a critical component of retention. Ultimately, while we are cautiously optimistic regarding the ability to leverage data to maximize upfront exemptions, we are also cognizant that the State's planned strategy for automation to occur on an extremely compressed timeline may create risks the full vision may not materialize by end of August for the September benefit month (when individuals who apply June 1 might have their three-month clock run out). We also note that the dissonance

between what clients may review on BenefitsCal about their case or hear recited to them over the phone by an eligibility worker may spur workload when clients attempt to “correct” discrepant information about an exemption that may have expired but has no bearing yet on their continuous eligibility until recertification.

Because of the uncertainty around the timeliness of automating data matching solutions, the remaining risk that clients with earlier recertifications may face of not being captured by auto-exempt data matching solutions, the relatively modest reduction in projected individuals subject to the time limit and work requirements, and remaining questions CWDA maintain about CDSS’ caseload reduction and workload projections, we are maintaining our ABAWD administrative funding budget request at pre-May Revise levels, as follows.

CWDA Request: The Budget can mitigate the risk of a hunger crisis and of a potential \$2 billion CalFresh benefit cost shift if we scale, train, and resource our county eligibility workforce to meet this moment. CWDA requests:

- **Adequate ABAWD administrative funding** to support ABAWD implementation, aligned with realistic workload assumptions, to ensure eligible Californians do not lose food assistance due to preventable administrative barriers: **\$213.6 million total funds (\$103 million General Fund) in FY 2026-27, and \$110.3 million total funds (\$58 million General Fund) in FY 2027-28 and annually thereafter to support up to 400 permanent FTEs statewide.** An ongoing investment will be essential so counties can have a sustainable funding source to hire the eligibility staff necessary to do the work. These investments mitigate harm, reduce churn, and protect both clients and the State from avoidable risk.
- **Holding base CalFresh administrative funding at Governor’s Budget levels for FY 2026-27 and rejecting the \$119 million General Fund cut, avoiding risking hundreds of eligibility worker positions statewide.** Given the unprecedented uncertainty surrounding H.R. 1, future federal actions, and client impacts, it is premature and high risk given the evidence from aligned states like Massachusetts to significantly reduce county CalFresh administrative funding based on early and projected caseload changes. Premature funding reductions would likely trigger significant staffing losses at the very moment counties must preserve workforce capacity to absorb increased workload demands and support vulnerable clients through complex

new requirements. Even though projected disenrollment may potentially increase, it is ultimately too early to tell, and critically, it does not necessarily translate to reduced workload as a result of H.R. 1 and other state policy changes. As such, CWDA also requests that county CalFresh administrative funding be held harmless until the caseload implications post H.R. 1 are better understood next budget cycle.

Issue 2: Reject County Share of Costs for SNAP State Administrative Expense Overspent

The May Revision includes \$52.9 million total funds (\$37.0 million General Fund) in FY 2025-26 and \$43.7 million total funds (\$30.6 million General Fund) in FY 2026-27 to maintain cash flow for CalFresh operations while the State requests, and is under review of, additional federal funding above a federally-established spending target for SNAP known as the State Administrative Expense (SAE). The SAE target allocation, shared with states every summer leading up to the following Federal Fiscal Year (FFY), serves as a guide on federally allowable administrative costs. Importantly, the SAE is not codified in federal statute or regulations and is an administrative target.

In April 2026, counties learned for the first time that the State was subject to a spending target for SNAP administration, and that it was the State's position that the existing CalFresh administrative sharing ratio set forth under 1991 realignment statute apply to the overage, in the event the federal government does not reimburse the State. This would mean that for the non-federal costs, which would be \$52.9 million in FY 2025-26, the State would be responsible for 70% of costs and counties would be responsible for 30%.

While it is our mutual hope that the cost will be recouped following the State's request, **CWDA has significant concerns with the expectation that counties should bear responsibility for these costs despite having no prior notice that such a target existed.** First, counties were never informed that such a threshold existed; it has never been communicated through allocation letters, formal guidance, or other county-facing materials, leaving counties with no reasonable opportunity to anticipate or plan for this liability. This is particularly troubling given the State is in receipt of the SAE notification annually and likely has been monitoring the risk given the growth in CalFresh caseload. Second, it has been longstanding claiming practice

that federal CalFresh administrative funding drawdown is effectively uncapped, and counties have long operated under claiming procedures that any county overmatch could be claimed dollar-for-dollar in federal CalFresh administrative funds (this is pre-H.R. 1 when administrative cost sharing ratios were 50% state/county and 50% fed).

Passing these costs on to counties at the very moment they are preparing for implementation of H.R. 1 will significantly worsen already severe fiscal and operational pressures. Counties are being asked to prepare for substantial new workload demands and prevent unnecessary benefit loss, yet absorbing additional unanticipated costs will inevitably force difficult budget decisions, including staffing reductions and cuts to frontline service capacity.

CWDA Request: For the aforementioned reasons, CWDA strongly contests requiring counties to bear any share of the SAE overage, in the event the federal government does not approve the State's adjustment request. CWDA requests the Legislature reject the assumption that the existing administrative cost sharing ratios apply to a cost counties were not informed of and could never conceivably have planned for and adopt the attached Budget Bill Language (Attachment I). The State's approach is particularly inequitable because it effectively penalizes counties because of higher CalFresh caseloads or increased service demand which forced counties across the State to invest more heavily in administration to serve eligible households. Rather than recognizing the operational realities counties faced, the proposal shifts financial liability onto counties when counties were being responsive to growing need and worked to maintain timely access to benefits during periods of heightened demand—all with zero knowledge of an expenditure limit the Administration is annually notified of.

Issue 3: Prevent Worst Impacts of H.R. 1 Cost Shift that Will Harm Clients

Beginning October 1, 2026, H.R. 1 reduces the federal share of CalFresh administrative costs from 50 percent to 25 percent. Under longstanding 1991 Realignment statute (WIC 18906.5), the non-federal share of CalFresh administrative costs are split 70 percent State and 30 percent counties. Historically, with a 50 percent federal share, this formula translated to counties paying 15 percent of total costs. Put another way, in order for counties to fully draw down all available state General Fund and federal funding, they were required to put up this 15 percent match

(though counties are generally able to draw down \$1 state dollar for every 42 cents they put up, up to the allocated amount available by the State).

When the federal share drops to 25 percent, the same statutory formula automatically increases the county share to 22.5 percent of total costs—a 50 percent increase in required local contributions without any change in revenues to support this increase. This results in a cost shift of over \$200 million in new county costs annually. Unfortunately, many counties lack the financial means to absorb a 50 percent increase in their required match overnight. Counties are having increasing difficulty meeting their share of cost and are in danger of not being able to run their programs because they do not have the funds to draw down the federal and state funds. Today, nearly 10 counties report they don’t anticipate being able to meet their match in FY 2025-26. **With an increase to 22.5 percent, approximately 73% of counties report they have a 50% or less confidence they will be able to meet this match, and would have to cut staff, office hours, or other access. This threatens widening inequities, especially for counties that have limited capacity to increase local resources, such as those in rural areas. Moreover, the impacts of the administrative cost shift are not confined to any single type of county, but will be felt broadly across counties and regions.** Of the counties who had 50% or less confidence, below is a breakdown by county size and region.

Number of counties by size and region who report barriers to increasing match

County Size	#*	%
Very small	7	17%
Small	5	12%
Medium	19	46%
Large	10	24%

Region	#*	%
Northern	12	29%
Mother Lode	9	22%
Southern	5	12%
Bay Area	7	17%
Central	8	20%

**May not add up to 58 due to number of survey respondents.*

Importantly, CalFresh administration is a realigned program under 1991 realignment, meaning realignment revenues are intended to support counties' share of costs. With slow revenue growth for the social services account that supports CalFresh administration and other human services programs, these revenues will fail to match this sudden, substantial rise in costs. Ultimately, failure to meet the higher match could leave hundreds of millions of dollars in state and federal funds on the table, directly translating into fewer workers processing applications and longer delays for families seeking food assistance.

Based on a recent survey, **at least 25 counties reported that they are entirely dependent on 1991 realignment revenues to support their county's CalFresh administration.** Because these counties have historically relied on realignment revenues to fund CalFresh administration, currently a stagnant fund source, they will have limited flexibility or additional revenue streams to absorb costs of this magnitude and a match waiver will be critical to providing relief.

If counties cannot draw down their State General Fund allocation, the consequences will be felt directly by CalFresh households. Recipients will experience longer wait times, delayed approvals, potential interrupted access to food benefits, and reduced capacity to handle customer calls, office visits, online submissions of documents and information, and over-the-phone interviews. Without relief, counties will be under-resourced, just as program complexity and client needs continue to intensify under H.R. 1.

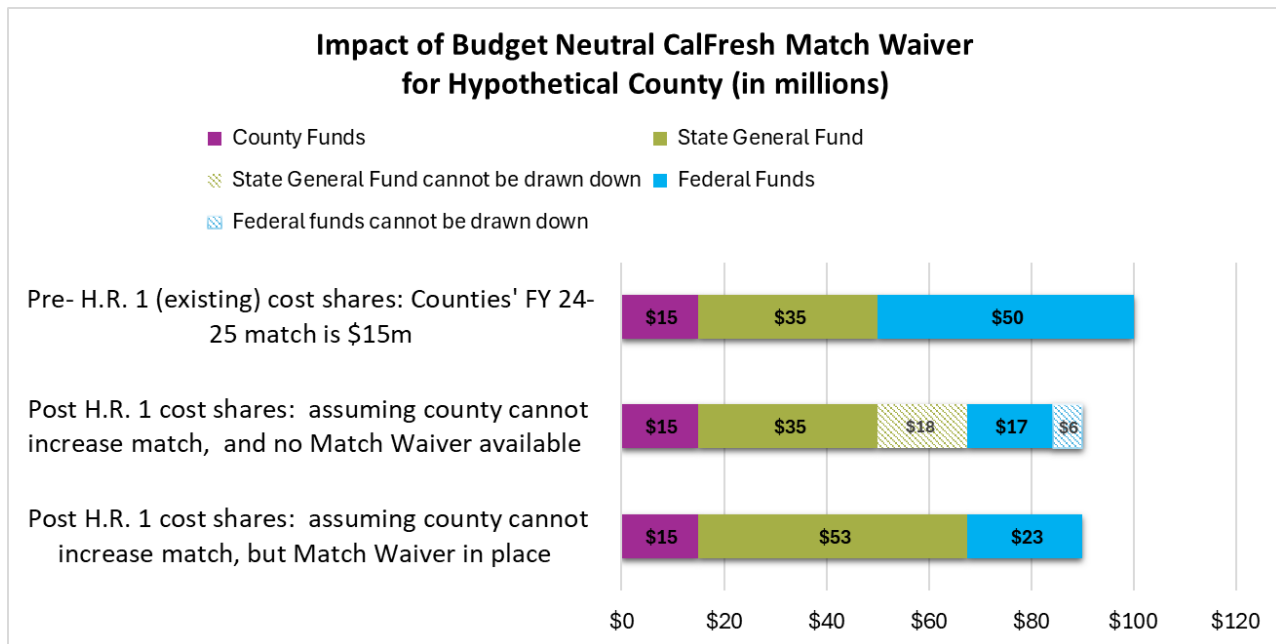
The State has previously acknowledged barriers counties face in meeting the CalFresh administrative match requirement and, in response, adopted temporary match waivers during both the Great Recession and the COVID-19 public health emergency (2020-2022). These waivers were cost-neutral to the State and prevented counties from leaving State General Fund dollars unclaimed.

CWDA Request: Adopt a temporary CalFresh match waiver (see Attachment II for Trailer Bill Language) that maintains county contributions at FY 2024-25 levels through at least FY 2028-29, and provides a four-year phase-out at that time. This multi-year approach to phasing out the Match Waiver would give counties time to ramp up their CalFresh Administration spending in a planned fashion, thereby avoiding potentially immediate and significant cuts. The match waiver would also reduce barriers to counties accessing the recently authorized \$20 million General

Fund for ABAWD readiness activities. This approach preserves access to food assistance, protects the State's investment, and prevents the loss of federal funds with no net General Fund impact.

The match waiver is a critical tool to prevent the worst-case outcome in loss of funding for CalFresh Administration as a result of H.R. 1. The match waiver is a critical tool to prevent the worst-case outcome in loss of funding for CalFresh Administration as a result of H.R. 1. Assuming 73% of counties cannot come up with their increased 7.5 percent match, without a match waiver in place, that could jeopardize potentially \$449 million in total funds, including State and federal dollars left on the table. In contrast, a match waiver would allow counties and the State to preserve drawdown of the majority of these dollars, and only result in loss of funding equivalent to the county's increased share of costs and the associated federal funding (again, we note, these counties face fundamental barriers in coming up with the match). This is an impact of potentially \$133 million total funds, in the scenario that those same 73% of counties cannot increase their match. That's a difference between a \$449 million versus \$133 million total fund impact (i.e., approximately \$315 million) to the State and counties' ability to deliver food benefits to vulnerable populations.

See charts below for further demonstration of how a match waiver can help preserve funding for CalFresh. In this example, County X is only able to contribute \$15 million toward CalFresh administration. Under existing cost shares, total funding for County X's CalFresh administration is \$100 million total funds. Absent a match waiver, the total funding for the county is reduced by 33% or down to \$67 million total funds. With a match waiver in place, the county can still tap into a portion of its State General Fund allocation (which will also increase from 35% to 52.5% pursuant to H.R. 1) and commensurate federal funds, meaning 90% of its funding is preserved.



We urge the Administration and Legislature to adopt this budget-neutral, common sense, and time-tested method to protect Californians accessing CalFresh by supporting counties who deliver our critical anti-hunger safety net program against H.R. 1’s cruel cost shift. The proposal simply allows counties to draw down additional funding without incurring a match, rather than risking leaving all of the additional funding on the table if county matching funds are not available.

Issue 4: Mitigating Pre-H.R. 1 County CalFresh Penalties for H.R.1 Implementation & Federal Changes Outside of Counties’ Control

Separate from H.R. 1, long-standing federal rules impose financial penalties on states with persistently high SNAP Payment Error Rates. Payment Error Rates (PER) reflect the complexity of program rules and administration and measure payment accuracy – including underpayments – not fraud or misuse. Long-standing federal rules impose financial sanctions on states that exceed 105 percent of the national PER average for two consecutive FFYs.

In California, a portion of these penalties are passed through to 19 Performance Measurement Counties (PMCs), who comprise the vast majority of CalFresh benefits in California. The 19 PMCs are as follows: Alameda, Contra Costa, Fresno, Kern, Los Angeles, Merced, Monterey, Orange, Riverside, Sacramento, San Bernardino, San

Diego, San Francisco, San Joaquin, Santa Clara, Solano, Stanislaus, Tulare, and Ventura.² These counties were selected to handle the quality control review of CalFresh cases to verify the validity of the actions.

The federal penalty is calculated based on all federal benefits issued in the respective fiscal year, multiplied by the difference between the state's PER and 6%, then multiplied by 10%. A portion of this penalty is passed through to PMCs with PERs above the national average, after excluding an amount assumed to be attributable to non-PMC counties.

The risk of this penalty is potentially likely in the coming years, and may be exacerbated by H.R. 1 implementation. Based on early estimates, California may exceed the threshold for a first-year sanction for FFY 2025. Using FFY 2025 data as a hypothetical, the resulting statewide penalty would have totaled \$56.7 million, with \$50.2 million subject to pass-on to PMCs. A fiscal impact of this magnitude would force counties to make significant tradeoffs, redirecting scarce administrative resources away from client-centered services at a time when households are already at heightened risk of losing benefits due to ABAWD work requirements. In addition, counties with higher error rates may bear disproportionately large shares of the penalty regardless of caseload size.

Yet counties do not control many drivers of the PER, including federal policy timelines, state implementation decisions, and external disruptions such as federal shutdowns. The State has discretion on how and when to implement federal policy changes, however, there are circumstances outside of the State and county control, that may result in an increased PER and therefore financial sanctions, such as implementation of major H.R. 1 provisions including ABAWD time limit and humanitarian immigrants well ahead of achievable timelines.

While existing regulations provide for an appeal of sanction pass-through, including for situations or actions beyond the county's control ([MPP 15-621](#)), counties should not be forced to appeal implementation decisions outside of county control, which will require significant state and county time and resources. Having to navigate an

² The counties were selected based on expenditure levels in the early 1990s. See [MPP Sections 15-310 to 15-621](#) for details.

appeals process to contest error penalties would create a significant administrative burden for counties, requiring extensive case review, data analysis, documentation gathering, written justifications, and ongoing follow-up under compressed timelines and uncertain outcomes. This work would likely require dedicated staffing resources and would divert staff away from core operations such as CalFresh and Medi-Cal processing, client outreach, and work requirement support at a time when counties are already facing substantial workload pressures under H.R. 1, increasing the risk of backlogs, delays, additional errors, and unnecessary client disenrollment. This must be addressed directly by temporarily modifying the formula for estimating each PMC county's liability for this volatile time of federally-driven changes that may increase errors.

CWDA Request: Hold Performance Measure Counties harmless from pre-H.R. 1 PER fiscal sanctions that are driven by state decisions and federal actions as a result of federal policy changes such as H.R. 1 and the government shutdown. These existing penalties are exacerbated by H.R. 1's harsh policy changes and federally imposed and unrealistic timeline which is forcing implementation decisions that expose counties to major fiscal penalties that are out of their control, and will undermine local efforts to mitigate the harms from H.R. 1 to CalFresh recipients. Temporary relief is needed to hold counties harmless. CWDA proposes that the 19 PMC counties should not be held financially responsible for federal sanctions resulting from policy decisions as a result of federal policies or circumstances in FFY 2026 and FFY 2027 that affect the PER but are entirely outside of county administration (see Attachment III for draft Trailer Bill Language).

Conclusion

These four issues—ABAWD expansion, the SAE target, the CalFresh match increase, and PER fiscal exposure—are deeply interconnected. Targeted, temporary relief and strategic investments will allow counties to continue translating public dollars into timely access to nutrition assistance while protecting the State from compounding fiscal risk. CWDA urges the Administration and Legislature to act on these proposals to stabilize CalFresh administration and prevent avoidable hunger across California.

Sincerely,

Carlos Marquez III, Executive Director | CWDA

Cc: Chris Woods, Office of the Senate President Pro Tempore
Mareva Brown, Office of the Senate President Pro Tempore
Jason Sisney, Office of the Speaker of the Assembly
Kelsy Castillo, Office of the Speaker of the Assembly
Elizabeth Freeman, Senate Budget and Fiscal Review Subcommittee No. 3
Nicole Vazquez, Assembly Committee on Budget Subcommittee No. 2
Kirk Feely, Fiscal Director, Senate Republican Fiscal
Joseph Shinstock, Fiscal Director, Assembly Republican Caucus
Megan DeSousa, Senate Republican Fiscal Office
Eric Dietz, Assembly Republican Fiscal Office
Ginni Bella Navarre, Legislative Analyst's Office
Ryan Woolsey, Legislative Analyst's Office
Richard Figueroa, Office of the Governor
Paula Villescaz, Office of the Governor
Kim Johnson, Health and Human Services Agency
Corrin Buchanan, Health and Human Services Agency
Jennifer Troia, California Department of Social Services
Kris Cook, Human Services, Department of Finance

