



August 20, 2018

Dear California Congressional Delegation:

RE: SNAP PROVISIONS IN THE FARM BILL CONFERENCE

The California State Association of Counties (CSAC), County Welfare Directors Association of California (CWDA) and County Health Executives Association of California (CHEAC) support the Supplemental Nutrition Assistance Program (SNAP/CalFresh) provisions contained in the Senate's *Agriculture Improvement Act* (S. 3042). We oppose the SNAP provisions contained in the House's *Agriculture and Nutrition Act* (H.R. 2) and urge the farm bill conferees to recede to the Senate on SNAP provisions.

Our organizations are all statewide associations representing the elected county Boards of Supervisors (CSAC), 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. Administered by California's counties, nearly four million individuals receive CalFresh benefits monthly, including two million children. The program is essential to many low-income working families in our state when they experience tough economic circumstances.

Our specific positions follow.

Senate Provisions

Extending the Certification Period for Older Adult Households: We support Section 4101 of the Senate bill giving states the option to extend the SNAP benefits certification period from 24 to 36 months for households in which all adults are 60 or older or are disabled and had no earned income since the last certification. The provision will ensure that eligible households will continue to receive uninterrupted benefits and will reduce county administrative costs for that segment of the SNAP population.

Increasing Funding and Flexibility for Employment and Training (E&T) Pilots: We support Section 4103 of the Senate bill expanding the types of activities allowed in SNAP E&T programs and the \$185 million spending increase for new competitive state grants to launch pilot projects for new E&T initiatives.

We also support the new requirements requiring additional skills assessments and case management for participants who have not found suitable training and that job training be combined with at least one other activity.

Nutrition Education: We support Section 4115 of the Senate bill requiring greater federal coordination of the Supplemental Nutrition Assistance Program Education program (SNAP-Ed).

House Provisions

Limiting Categorical Eligibility: We oppose Section 4006 of the House bill. The provision would restrict severely the administrative flexibility California and its counties use to determine whether working families qualify for SNAP. Such a change will not only increase food insecurity for many families, it will also increase the SNAP administration costs for counties.

Eliminating Flexibility in Determining the Standard Utility Allowance: We oppose Section 4010 of the House bill which would cut benefits to non-elderly households with high housing and utility costs by eliminating the state option to use the receipt of Low Income Home Energy Assistance Program (LIHEAP) benefits as a proxy for SNAP eligibility. 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.

Mandating Child Support Cooperation: We oppose Section 4011 of the House bill mandating all states to require custodial and non-custodial parent cooperation in child support in order to receive SNAP benefits. Mandating cooperation is optional for states and only six states are currently utilizing this option, given the administrative costs to implement it and the potential adverse consequences to children and their families. The Congressional Budget Office estimates that the provision would cost \$7.2 billion over ten years and reduce SNAP benefits by \$3.4 billion at the same time.

Increasing Work Requirements and Sanctions: We oppose Section 4015 of the House bill imposing punitive work requirements and sanctions on SNAP households. Most households can and do work. The 20 hour per week requirement and the one-year denial of benefits for failure to comply during a month ignores barriers encountered by individuals such as unreliable transportation, changing work schedules in the retail and service sectors and other factors often beyond the individual's control. CBO estimates that the House provision would result in a loss of \$9.2 billion in SNAP benefits over ten years. That estimate does not account for the anticipated significant increase in state and county costs to track each month the millions of individuals subject to the requirement.

The increase in Employment and Training (E&T) funding provided in the House bill to support the increased work requirements is woefully underfunded. Thirty-six of our 58 counties currently operate a SNAP E&T program for approximately 100,000 individuals. The state of California estimates that expanding it to about one million individuals under the House measure will require our counties to provide E&T services for \$137 per person per year at a cost of \$800 million in the first two years of implementation.

Dismantling California's SNAP-Ed Infrastructure: We oppose Section 4033 of the House bill. 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. 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. They are well-known and trusted entities in every California community so that our partners may more effectively reach eligible SNAP-Ed beneficiaries and reduce service gaps across California's diverse landscape. Shifting the responsibility to land-grant institutions will undo the years of work our agencies undertook to build a successful program.

Conclusion

As the Senate and House conferees work to resolve the differences between their respective farm bills, CSAC, CWDA and CHEAC urge them to include the Senate provisions in the final bill and reject the House provisions. SNAP works for working families, persons with disabilities and older individuals. The Senate bill's provisions improves upon the foundation of SNAP while the House bill increases food insecurity and increases county administrative complexity.

Sincerely,



Justin Garrett
Legislative Representative | CSAC



Michelle Gibbons
Executive Director | CHEAC



Frank Mecca
Executive Director | CWDA

cc: California Department of Social Services