



Food and Nutrition Service  
United States Department of Agriculture  
1320 Braddock Place  
Alexandria, Virginia 22314

November 28, 2023

Dear Deputy Under Secretary Stacy Dean and Administrator Cindy Long:

The California Association of Food Banks (CAFB), a non-profit association with 41 member food banks across California and over 50 SNAP outreach partners across the state working to end hunger, and GRACE/End Child Poverty in California, an organization that works to end child poverty in California appreciate the opportunity to provide feedback on USDA's Comment Request- Understanding States' SNAP Customer Service Strategies- *OMB Control Number: 0584-NEW*.

Food insecurity in California remains nearly double the pre-pandemic levels and is rising. Today, over one in five people in California are facing the toxic stress and health consequences of food insecurity, with deep disparities for communities of color.<sup>1</sup> With the ending of SNAP Emergency Allotments in March of this year and the ending of Pandemic-EBT, California has lost one-third of its food safety net, putting a severe strain on families facing hunger.<sup>2</sup> Almost 5 million Californians rely on SNAP for food assistance, and many more qualify yet aren't enrolled in the program. Low participation is due to various reasons, including people's experience with customer service in SNAP or what they have heard from others about their experience applying for SNAP. Everyone deserves to feel dignified and respected when applying for public benefits.

We appreciate that FNS is interested in exploring how state agencies define and measure the quality of customer service for SNAP applicants and participants. We urge FNS to use our feedback when considering what the case study will look like and to create recommendations for all states to adopt improved customer service practices. FNS should consider giving state agencies additional funding to support them in improving their practices. By improving customer service, state agencies can reduce churn and overpayments and increase the number of people enrolled in SNAP. It can also reduce stigma and fear among community members, increase awareness about SNAP, and make the program more equitable.

### **Case Study: In-person site visits**

We appreciate that the research team will include observing staff interactions with customers and interviews with state, regional (e.g., call center), local SNAP staff, and key stakeholders

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<sup>1</sup> California Association of Food Banks (2023, September). *Safety Net Cuts in the Midst of High Poverty Worsen Hunger Crisis*. <https://www.cafoodbanks.org/blog/safety-net-cuts-in-the-midst-of-high-poverty-worsen-hunger-crisis/>

<sup>2</sup> California Association of Food Banks (2023, February). *CalFresh Emergency Allotments and Pandemic-EBT are ending*. [https://www.cafoodbanks.org/wp-content/uploads/2023/03/2023\\_Emergency-Allotments-PEBT\\_Factsheet.pdf](https://www.cafoodbanks.org/wp-content/uploads/2023/03/2023_Emergency-Allotments-PEBT_Factsheet.pdf)

during in-person site visits. Below are our recommendations for ensuring FNS can get honest and well-rounded feedback from various stakeholders:

- FNS should interview SNAP participants.
  - We urge FNS to consider interviewing SNAP customers during the in-person site visits about their experience applying for or keeping their food benefits, as they can give a first-hand perspective of the customer service process. It is difficult for FNS to get a proper perspective on the customer service process if they do not hear directly from customers. These participants should receive a fair stipend for their time, and FNS should not coerce anyone into participating. Additionally, FNS should strive to interview participants across multiple languages, ages, and abilities to understand the different barriers customers may face.
- The process for all interviews during the case study should be anonymous and confidential.
  - When FNS conducts these interviews, they should reinforce that feedback will be anonymous and that the goal is to improve the experience of applying for and keeping SNAP benefits, not to get state agencies in trouble. Staff members may worry about being honest if they think their job is at risk based on how they answer in the interview. Similarly, if customers feel that their benefits are at risk, based on the feedback they give about customer service, they may not be honest or want to participate. By stating the goal of these interviews and holding the interviews in a confidential setting, those participating in the process will feel more comfortable sharing openly.
- The FNS team observing staff interactions with customer service systems during these site visits should ensure they observe interactions across different variables. No customer is alike, but the more variables FNS observes, the better understanding FNS may have of the customer service process different individuals and households go through. For instance, they should make sure that they are spending time observing a staff interaction with a customer who:
  - Speaks a non-English language
  - Has a disability
  - Is unhoused
  - Is a college student
  - Is in a mixed-status household
  - Someone who is elderly
  - Is getting assistance with different types of SNAP services (renewal, new application, submitting documents, reporting a change in their case, etc.)

We are grateful that FNS will choose nine states to participate in this case study rather than a smaller number of states, and we suggest that FNS repeat this case study annually until all states have participated. Every state operates differently, so if FNS has seen nine states, they haven't seen it all, and the more states FNS visits, the more state agencies can learn from one another. Additionally, FNS should consider "secret shoppers" that interact with each state yearly to get a clearer sense of the everyday customer experience using the Program Access Review Guide Tool for FNS Regional Offices. If a state agency knows that FNS is coming for an in-person site visit, they may act differently than if a "secret shopper" came in person or called the office for assistance. FNS should ensure secret shoppers are multilingual. FNS should share the findings from these reviews with state agencies and the public.

We are grateful that FNS will take the time to review existing studies, reports, and data on customer service strategies and approaches as part of their research. A survey by the Urban Institute showed that 40% of adults applying for public benefits like SNAP report difficulty determining eligibility, providing documents, and getting benefits when needed.<sup>3</sup> Hispanic adults were more likely to have trouble than white adults. By streamlining access to SNAP, customers will have a better experience applying for and keeping benefits. **We encourage FNS to review the findings and suggestions below that can help state agencies streamline services and improve their customer service:**

- FNS should review research conducted by Code for America. This nationwide non-profit organization breaks down barriers and finds solutions to problems, like the difficulty of applying for public benefits. Their principles around many welcoming doors to applying for benefits, an easy-to-understand application process, an informed decision-making process, being responsive to changing needs, and providing simple actions to receive benefits, have made their California SNAP application website, GetCalFresh.org, a popular way to apply among customers and SNAP assistors. They have helpful resources that state agencies could use to improve customer service online, over the phone, and in person:
  - Through User-Centered design research, Code for America found that how “self-employed income” is worded in the SNAP application can determine if someone thinks of themselves in this category and, therefore, takes advantage of the self-employed deduction.<sup>4</sup> Providing a self-attestation template to support customers led over 1 in 5 people to submit the needed verification of this income with their initial application. When people have an easier time claiming their deductions, they are more likely to qualify for more benefits and qualify in the first place.
  - Many customers are denied benefits due to being marked as a no-show for their invite. Code for America conducted a pilot in LA County that offered a flexible interview line, leading many participants to enroll in benefits and receive them faster.<sup>5</sup> By allowing customers to engage in the SNAP application process at a time that worked best for them, they had a higher chance of enrolling in the program.
  - Code for America supported multilingual research to identify barriers non-English speakers face to enrolling in SNAP and provide recommendations, such as the importance of incorporating different written and spoken language options. For example, some communities prefer writing in Simplified Chinese, while others prefer writing in Traditional Chinese, and SNAP applications should allow customers to write in either language.<sup>6</sup>
  - The language used by workers and in a SNAP application impacts the “psychological ownership” someone has about government benefits. The more

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<sup>3</sup> Urban Institute (2023, January). *Customer Service Experiences and Enrollment Difficulties Vary Widely across Safety Net Programs*, <https://www.urban.org/research/publication/customer-service-experiences-and-enrollment-difficulties>

<sup>4</sup> Code for America (2019, October). *Overcoming Barriers: Helping Self-Employed Applicants Access Their Full CalFresh Benefits*. <https://codeforamerica.org/news/helping-self-employed-applicants-access-their-full-calfresh-benefit/>

<sup>5</sup> Code for America (2021, December). *Thing Big, Start Small: How Implementing Flexible Interviews Improves Benefit Delivery*. <https://codeforamerica.org/news/think-big-start-small-how-implementing-flexible-interviews-improves-benefit-delivery/>

<sup>6</sup> Code for America (2022, June). *Why Multilingual Research Matters*. <https://codeforamerica.org/news/why-multilingual-research-matters/>

psychological ownership an individual feels, the more likely they are to apply for benefits.<sup>7</sup>

- Code for America found that splitting questions about income, using simple terms, and providing examples made the SNAP application easier for customers.<sup>8</sup>
- Simple changes to SNAP application websites, such as making screens readable and clickable without zooming in, significantly impact the client experience.<sup>9</sup>
- Roundtables with SSI recipients showed the importance of providing an accessible, low-stress way to apply for SNAP benefits.<sup>10</sup>
- Providing verification reminders both during the application and a few weeks later, giving personalized guidance for submitting documents, and giving an example of a self-attestation template are just a few recommendations Code for America has for helping customers submit verifications.<sup>11</sup>
- Code for America identified obstacles unhoused customers face to receiving SNAP and provided recommendations for government partners to address these concerns.<sup>12</sup>
- Code for America's Benefit Enrollment Field Guide shows a variety of human-centered best practice metrics, such as web accessibility and reading level, for public benefit websites across the nation. For instance, BenefitsCal, California's website for applying for public benefits, has a more accessible reading level for customers than websites in other states, but they could improve the time it takes to complete an application.<sup>13</sup>
- The California Department of Social Services (CDSS) has guides and resources on improving customer service, including:
  - A Framework of Solutions for Customer Experience and Access with recommendations including allowing electronic signatures, upgrading IVR, offering same-day service, and more.<sup>14</sup>

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<sup>7</sup> Code for America and the Proceedings of the National Academy of Sciences (2021, June). *Psychological ownership interventions increase interest in claiming government benefits*. <https://www.pnas.org/doi/10.1073/pnas.2106357118>

<sup>8</sup> Code for America (2018, August). *Overcoming Barriers: Finding Better Ways to Ask GetCalFresh Applicants about Income*. <https://codeforamerica.org/news/overcoming-barriers-finding-better-ways-to-ask-getcalfresh-applicants-about-income/>

<sup>9</sup> Code for America (2022, February). *Simple Changes Can Make a Big Difference for Clients Accessing Government Benefits*, <https://codeforamerica.org/news/simple-changes-can-make-a-big-difference-for-clients-accessing-government-benefits/>

<sup>10</sup> Code for America (2019, July). *Improving Food Access for Seniors and People with Disabilities*. <https://codeforamerica.org/news/improving-food-access-for-seniors-and-adults-with-disabilities/>

<sup>11</sup> Code for America (2019, March). *Overcoming Barriers: How GetCalFresh Helps Applicants Submit Verifications*, <https://codeforamerica.org/news/overcoming-barriers-how-getcalfresh-helps-applicants-submit-verifications/>

<sup>12</sup> Code for America (2019, February). *Barriers to CalFresh for Applicants Experiencing Homelessness*. [https://s3-us-west-1.amazonaws.com/codeforamerica-cms1/documents/Barriers-to-CalFresh-Report\\_Code-for-America\\_February-2019.pdf](https://s3-us-west-1.amazonaws.com/codeforamerica-cms1/documents/Barriers-to-CalFresh-Report_Code-for-America_February-2019.pdf)

<sup>13</sup> Code for America (2022). *What the online enrollment experience for safety net benefits looks like across America*, <https://codeforamerica.org/programs/social-safety-net/benefits-enrollment-field-guide/?att=reg&j=AK&app=4&dev=d>

<sup>14</sup> California Department of Social Services (2019, May), *Framework of Solutions for Customer Experience and Access: Resource Toolkit 3.0*, <https://www.cdss.ca.gov/portals/9/calfresh%20ssi%20cash-out/framework%20of%20solutions%20tool%20kit%203.0.pdf?ver=2019-05-22-134648-770>

- Tulare County in California modernized its service delivery to better serve customers. Other states and counties could replicate Tulare County's steps to do this.<sup>15</sup>
- California used to have annual CalFresh (SNAP) Operations and Access Reports, which can be a great way for state agencies to ensure they meet SNAP program needs.<sup>16</sup> CDSS also hosted operation roundtables with counties to share innovative solutions for improving customer service across counties.<sup>17</sup> Other states that have county-administered SNAP could do the same, and there could be more opportunities for roundtables across states.
- The County Welfare Directors Association of California has a framework for advancing customer service culture in health and human services that states could replicate. By conducting customer focus groups and customer surveys and working with stakeholders, they identified ways to improve the customer service experience.<sup>18</sup>
- The San Francisco and Marin Food Bank studied modernizing the SNAP user experience and provided recommendations such as consumer-driven options for scheduling interviews and providing on-demand interviews.<sup>19</sup>
- The CalFresh Expansion to SSI Recipients report by the California Association of Food Banks includes recommendations for improving accessibility in SNAP for people with disabilities. Effective phone-based mechanisms for SNAP were a priority for older adults and people with disabilities.<sup>20</sup>

**In addition to reviewing studies, reports, and data, FNS should review online platforms like Reddit to see the main concerns participants are bringing up to help identify what customer service strategies and approaches are needed.** In a quick Google search, we found countless complaints from Reddit users about their experience applying for SNAP. Many had difficulty using the call centers to reach an eligibility worker, and some expressed frustration with the eligibility workers they talked to, which is similar to what we have heard from customers at the California Association of Food Banks. FNS can identify patterns and needs by looking at Reddit, such as states needing to improve their call centers. While many customers can manage some aspects of their public benefits online or in person, many prefer to call the county directly when there is an urgent need. For instance, families with less than \$100 in their bank account may be eligible to receive CalFresh food benefits within three days, and calling the country is typically the quickest way to get approved for expedited services. Because a significant percentage of the public

<sup>15</sup> California Department of Social Services and Tulare County. *Case Based to Needs Based Service Delivery*. <https://www.cdss.ca.gov/foodstamps/res/pdf/Tulare%20Case%20Based%20to%20Needs%20Based%20Service%20Delivery.pdf>

<sup>16</sup> California Department of Social Services. (2014, May) *CalFresh Operations and Outcomes Report*. <https://www.cdss.ca.gov/research/res/pdf/foodreports/CFSurvey1213.pdf>

<sup>17</sup> California Department of Social Services. *CalFresh Operations Roundtable*. <https://www.cdss.ca.gov/inforesources/calfresh-resource-center/meetings-and-conferences/big6meetinginformation>

<sup>18</sup> County Welfare Directors Association of California. (2013, April). *A Framework for Advancing a Culture of Customer Service in Health and Human Services*. <https://www.cwda.org/sites/main/files/file-attachments/framework-for-advancing-culture-of-customer-service.pdf?1450736366>

<sup>19</sup> San Francisco Marin Food Bank and UC Berkeley Goldman School of Public Policy. (2016, May). *Modernizing the CalFresh User Experience*. <https://www.sfmfoodbank.org/wp-content/uploads/2016/10/FINAL-REPORT-Modernizing-the-CalFresh-User-Experience-6.14.2016-1.pdf>

<sup>20</sup> California Association of Food Banks. (2022, June). *Expanding CalFresh to California's SSI Recipients: Successes and Opportunities*. <https://www.cafoodbanks.org/wp-content/uploads/2022/09/CalFresh-Expansion-to-SSI-Recipients-Lessons-and-Opportunities.pdf>

benefits population have unique vulnerabilities (e.g., people with disabilities, limited English-language skills, limited tech knowledge or wifi, and limited time), the contact center phone system must be easy to navigate and accessible. These are a few examples of recent posts on Reddit that show the barriers clients face to receiving good customer service:

- *“How do I report a rude cal fresh worker (on the phone)?The lady answering my call was very rude. I got her name and her worker code. She also was trying to hint she can add notes about people through her end. Could she add something bad about me on her side to mess up my benefits? She had a entitled attitude the whole time and the way she spoke was very condescending.”- Reddit User*
- *“CalFresh never answers their phones anymore, what do I do?I have been calling for weeks (I think since April) and I always press speak to a worker and then it redirects me all the way back to the beginning of the menu. “Press one for English.” It doesn’t matter whether it’s 8 am or afternoon. What the heck is wrong with their system?” - Reddit User*
- *“I never got a call for an interview, and I can’t get in contact with CalFresh. I have not received anything about an interview. I keep getting emails saying if I haven’t interviewed then I need to call to schedule one. However when I call CalFresh, I’m placed in hold for hours and nobody picks up. There is no other way to contact them besides phone from what I understand. What do I do?” - Reddit User*

Through these case studies and research, FNS will be able to inform state agencies about the current state of customer service in their state and provide innovative solutions or recommendations for improving customer service nationwide.

**Furthermore, when FNS releases an outcomes report at the end of their case study and research, It is important that they also encourage states to invest in processes that have already been shown to improve customer service:**

- States and counties should be required to opt-in to features that streamline the SNAP process and better support customers when states have the technology and funding to do so.
  - There are currently 19 state SNAP policy options and waivers. These self-attestation, waivers, simplified applications, and standard deductions are all shown to make the application process easier for households. Yet, many states decide not to opt in, making it more difficult for individuals to get food assistance and creating inequitable eligibility standards.
  - Some states cross-train employees for both SNAP and Medicaid, allowing customers to complete the interview for both benefit programs simultaneously. It would be beneficial for customers if all states did this.
  - When counties can opt-in for a feature, they should be encouraged to. For instance, all California counties can opt-in to provide an “interview nudge,” where customers who apply online through the state application website can get information at the end of their application about how and when they can call to complete their interview. Yet, unfortunately, not all counties have opted in for this feature. If all states and counties opted into more features, there would be more equity in the SNAP application process.

You should have the same resources and experience applying for SNAP no matter where you live.

**FNS should also “walk the talk” by providing opportunities for states to improve their customer service:**

- FNS should provide more grants or funding for state agencies to:
  - Continue working on SNAP modernization projects.<sup>21</sup> Many state agencies may know how to improve customer service; they just do not have the funds to make it happen.
  - Hire more SNAP Outreach Partners that help customers, such as the unhoused, farmworkers, non-English speakers, college students, elders, and families apply for SNAP.
  - Improve language access. If state agencies had more funding to hire more staff to run the translation lines and more staff to support language access, there would be more equity in who gets SNAP. Additionally, FNS should enforce language access standards, such as ensuring that wait times for translation lines are no longer than those for regular phone lines.
    - 3 million people on SNAP in California primarily speak a language other than English.<sup>22</sup> This population and those who do not speak English often face added barriers to receiving SNAP. They may have trouble submitting added documents if they do not have someone who speaks their native language or have to wait on hold for someone to answer the phone on the translation line. Because of these challenges, they are under-enrolled in SNAP. For instance, only 49% of Spanish-speaking SSI recipients have enrolled in SNAP in California compared to 62% of English speakers.<sup>23</sup>
  - Hire more eligibility workers with higher pay.
    - If state agencies had more eligibility workers, then these staff would be able to spend more time helping customers. It is difficult for eligibility workers to patiently walk customers through how to provide specific documents due to time constraints. Yet, that extra 10 minutes with a worker could make the difference if the customer follows through with an application. Additionally, customers sometimes report that an eligibility worker seemed agitated or rude on the phone, and if eligibility workers are less stressed, they will provide better customer service.
    - Hiring more state staff at better pay to reduce turnover could also ensure that the turn-around time for SNAP applications is as fast as possible. Every day an application takes to process is a day a child, elder, or other individual might go hungry.

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<sup>21</sup> Urban Institute. (2023, March). *Exploring States' SNAP Modernization Projects*. <https://www.urban.org/projects/exploring-states-snap-modernization-projects>

<sup>22</sup> CDSS (2023, November). *CalFresh Data Dashboard*.

<https://public.tableau.com/app/profile/california.department.of.social.services/viz/CFdashboard-PUBLIC/Home>

<sup>23</sup> Diana Jensen (2023, October). *SSI CalFresh Expansion Dashboard*.

<https://public.tableau.com/app/profile/diana.jensen8067/viz/SSICalFreshExpansionDashboard/Welcome>

- FNS should continue funding SNAP EBT technology and security to prevent future skimming. States should upgrade their cards to chip technology, using funding provided through FNS, and state agencies should continue to be able to use federal dollars to reimburse customers who have been skimmed.
- Additionally, FNS should offer more opportunities for self-attestation or standardized deductions, such as providing a self-attestation option for medical deductions.
- Lastly, FNS should allow states to opt for the Combined Application Project (CAP) for SNAP and SSA, which streamlines the SNAP application process for older adults and people with disabilities.
  - Over 1.1 million people in California receive Supplemental Security Income (SSI), and almost 1 in 7 people on SSI in the U.S. live in California. One in 2 SSI recipients are 65 and older, and seniors are the fastest-growing homeless population in California.<sup>24</sup> It is difficult for this population to navigate the paperwork, interview process, and reporting that comes with SNAP, which is one reason why only 61% of SSI recipients in California have enrolled in SNAP. FNS could improve the customer service it provides to these recipients by opening up an opportunity to participate in CAP.

## Conclusion

The California Association of Food Banks and GRACE/End Child Poverty in California have seen how SNAP operates and their impact on participants. We appreciate the time and energy FNS puts into understanding states' customer service strategies. Thank you for the opportunity to submit a comment on *OMB Control Number* 0584. If you have any questions, please contact Gabby Davidson at [gabriela.davidson@cafoodbanks.org](mailto:gabriela.davidson@cafoodbanks.org).

Sincerely,



Shimica Gaskins, President and CEO, GRACE/End Child Poverty California



Gabby Davidson, Policy Advocate, California Association of Food Banks

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<sup>24</sup> CalMatters (2023, February). *The fastest-growing homeless population? Seniors*. <https://calmatters.org/health/2023/02/california-homeless-seniors/>