

Appendix Z. California Association of Food Banks Public Comments



CALIFORNIA
ASSOCIATION OF
FOOD BANKS

June 5, 2023

Michael Burke
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Food and Nutrition Service
U.S. Department of Agriculture
1320 Braddock Place
Alexandria, VA 22314

Re: Agency Information Collection Activities: Proposed Collection; Comment Request: Improving Coordination Between SNAP and Medicaid in State Agencies

Dear Mr. Burke,

The California Association of Food Banks represents 41 food banks and 6,000 charitable partners working to end hunger in California. We stand on the front lines of hunger and see first-hand the challenges low-income Californians face to afford food and make ends meet. Yet, as hard as we work to help those struggling with hunger in our communities, we could never meet the need without robust anti-hunger programs like SNAP.

Founded by the Daughters of Charity, who have been working in California since 1852, GRACE and the End Child Poverty in California (ECPA) Campaign strives to address the needs of those living in poverty and dares to imagine a liberated future, free from systemic racism and poverty, in which all children experience a childhood of abundance, dignity, love, and opportunities to thrive.

We are grateful that the USDA is exploring opportunities for how the USDA can help to ensure robust coordination between SNAP and Medicaid in State Agencies, and for the opportunity to provide comment on this proposal.

SNAP is California's first line of defense against hunger [reaching over 5 million low-income Californians](#). Statewide, [households participating in SNAP comprise a diverse demographic](#) with more than 61% of SNAP participants in families with children, nearly 19% in families with members who are elderly or have disabilities and over 40% in working families.

In addition to [stabilizing household income and preventing poverty](#), [SNAP improves health outcomes and is associated with better nutrition](#). While SNAP provides only a modest benefit — just \$2.15 per person per meal in 2023 in California— it is an essential foundation for health, wellbeing, and improved food security.

SNAP benefits are also linked with lower healthcare costs. [Research shows that low-income adults participating in SNAP incur about \\$1,400, or nearly 25 percent less in medical care costs in a year than low-income non-participants](#). In contrast, when SNAP benefits run out at the end of the month, hospital admissions rise and demand for food from emergency food providers like soup kitchens and food

pantries increase. In fact, a research study documented that risk for hypoglycemia admission increased 27 percent in the last week of the month compared to the first week for inpatient admissions from 2000-2008 in California, illustrating how exhaustion of food budgets at month's end is an important factor in driving health inequities.

In USDA's effort to understand and forge new opportunities for cross enrollment pathways between Medicaid and SNAP, we urge a thorough look at the specific challenges faced by people leaving prison or jail and returning home.

Thousands of Californians are released from prison or jail every year. Because of the COVID-19 Public Health Crisis and the high risk of contracting coronavirus while incarcerated, thousands more people who are considered to be safe to reenter society are being released early. At the same time, food banks are being overwhelmed with spikes in food demand due to the health and economic crisis. SNAP draws federal funds to increase food security at the rate of nine meals for every one that food banks provide.

Due to high post-incarceration unemployment and poverty rates, people exiting prison or jail are likely to experience hunger, and almost one-half will be reincarcerated. The Reentry Policy Council of State Governments, which is a bipartisan working group with representatives of national associations of probation, parole, and corrections administrators, courts, police, and mental health and housing experts, issued a report that credits public benefits and job training as key contributors to successful reentry of people exiting prison. Eighty percent of incarcerated people are low-income and thus eligible for programs such as SNAP.

Medicaid has more recently has created 90-day in-reach activities to help create that critical bridge. The same is needed for other social supports so that individuals can be released and immediately supported with critical resources like SNAP/Cal-Fresh, which effectively reduces the risk for financial strain, additional stressors post-release, and the likelihood to recidivate.

One aspect of this is creating a stronger working relationship between federal, state, and local agencies to understand barriers in getting individuals approved for SNAP as it relates to criminal justice reentry. In California, the Department of Corrections and Rehabilitation have approximately 40,000 incarcerated individuals leaving California prisons each year, with about a 50/50 split amongst supervision at the state level (parole) and supervision at the local level (probation). It's estimated that as of June 30, 2023 there will be approximately 37,500 individuals on parole with hundreds of thousands more on probation (as of 2018, approximately 350,000 individuals were on some form of supervised probation). A majority of those individuals have some level of planning/release engagement prior to leaving jail or prison but in most cases, are outside of the timeframe for which SNAP applications can be submitted without a denial. This leaves individuals – post-release – often responsible for taking their applications in and submitting for benefits, which in most cases, simply does not happen.

According to CDCR, approximately 15-20% of individuals on parole receive some form of post-release reentry service from providers, leaving a vast majority of individuals leaving prison to request benefits on their own accord. Separately but connected, CDCR's reentry needs assessment identifies that between 40-50% of parolees leaving prison will have a moderate to high financial, employment, and residential instability – indicating that any and all social supports available to them would likely benefit their stability as they reenter the community. The Federal, State, and local agencies must come together to better understand how an incarcerated person leaves jail or prison, the timelines in which pre-release engagement occurs, and the timeframes in which supports are available.

Across the country, administrators are enacting pre-enrollment and early applications projects with prison and jail administrators to ensure immediate access to benefits upon release. These states' SNAP beneficiaries also have immediate eligibility to participate in job training programs through the SNAP E&T Program, improving their chances of employment and financial stability.

In 2020, California passed [AB 3073 \(Wicks\)](#), which requires the California Department of Social Services to issue guidance for County Human Services Agencies to ensure that they are apprised of the allowable and best practices to assist someone expected to be released from county jail or state prison or has recently been released from county jail or state prison.

[Starting in March 2021, Orange County in California began allowing people in prison to apply for SNAP benefits up to 30 days before their release](#) under a pilot program approved by the USDA. They identified addressing basic daily needs in order to ensure a successful transition back into the community as part of an aggressive County criminal justice reform strategy known as the [Integrated Services Strategy](#).

This waiver is specific to pre-release individuals and allows the State agency the ability to accept and process applications submitted by prisoners nearing their release date. Eligibility workers can conduct an interview with the inmate by telephone once the electronic or paper application is received. Benefits are held until that individual is released. This all happens approximately 5-10 days prior to his/her anticipated release. This waiver has been very beneficial to this population and improves access to SNAP benefits at a particularly vulnerable time, when they have just been released from prison and are unlikely to have the resources needed to ensure food security.

[We know that repealing the SNAP ban can reduce recidivism:](#)

Research has long shown how expansion of supportive services can be used to prevent crime and support the formerly incarcerated. In 2020, the push to shift funds away from the criminal justice system and toward social services moved from activist spaces into the national conversation, as protestors demonstrating against racism and police brutality poured out into the streets following the highly polarizing murder of George Floyd. In the years since, policymakers have had to grapple with how different constituent groups perceive the threat of crime and the role of social services, while following what rigorously sourced evidence says about how to keep crime rates trending downward and while responsibly managing state budgets. One government-administered benefit that appears to have an effect on how well those convicted of a crime are able to reenter society and avoid further infractions is the Supplemental Nutrition Assistance Program (SNAP), still popularly known as food stamps.

In a recent study, we find that accessible food stamps programs can serve as a crime control measure, preventing recidivism among those with prior convictions. We studied the impact that the drug felony ban on SNAP had on recidivism in California. This ban was passed as a part of the Personal Responsibility and Work Opportunity Act of 1996 (PRWORA), and banned anyone convicted of a drug felony from receiving SNAP for the rest of their lives. Our findings show how these restrictions appeared to fuel further criminal offenses and increased costs for the state.

[In addition, a report from 2016 highlights the many benefits of a SNAP pre-enrollment program for people leaving prison or jail:](#)

- A SNAP pre-enrollment program for the re-entering population is feasible and needed due to the special barriers that formerly incarcerated people face in completing the application process that otherwise delays them from receiving benefits.
- The groundwork for this pre-enrollment program, in terms of inter-agency collaboration, has already been laid through innovative legislation, such as AB 720 (Skinner), a MediCal pre-enrollment program and AB 2308 (Stone), a mandatory ID program.
- Giving counties the option to implement their own processes for SNAP pre-enrollment allows for county individuation and innovation within California's decentralized administration of the program.

[Finally, the Center on Budget and Policy Priorities explains how SNAP can serve the formerly incarcerated population:](#)

Given the size of the reentering population and the importance — for the formerly incarcerated themselves as well as their families and communities — of a successful transition, policymakers have a strong incentive to promote policies that encourage social and economic reintegration.

In conjunction with critical social services, access to basic supports like food assistance could help this population attain self-sufficiency and avoid reengagement with the criminal justice system. SNAP can be a key part of a reentry support infrastructure, providing basic food assistance and supplementing inadequate income. SNAP is especially important in states where low-income individuals do not have access to other help — for example, in states that have not adopted the Affordable Care Act's Medicaid expansion and may not provide health coverage or other key supports to low-income adults. Additionally, targeted services through the SNAP Employment and Training (E&T) program could mitigate some of the steep barriers to employment that formerly incarcerated persons face.

We urge USDA to consider the following recommendations:

Ensure that pre-enrollment in SNAP is paired with other supports for successful re-entry:

- Pre-enrollment into SNAP and SSI are important, but should do more to make sure the enrollment is a success
- Provide robust support as people come home: Transitional housing, gate money, resources through SNAP interview and SSI assessment (for ex. accurate information on food banks, other community aid)
- The first 24 hours after release is especially important

Pre-enrollment requires an accountability mechanism to ensure follow through:

- Help to facilitate MOUs between prisons/jails and the Social Security Administration

Ensure that states are supported in providing necessary ID documents to facilitate streamlined enrollment in SNAP and other public benefits:

- In California [SB 629](#) (Roth) was passed, making it easier for people leaving jail or prison to get IDs through the DMV
- People returning to their communities also need birth certificates

In closing, we urge the USDA to enroll eligible Californians who are expected to be released or who have recently been released from jail or prison into SNAP, thus reducing food insecurity, recidivism, and helping to support successful reentry into our communities and increasing public safety.

Sincerely,



Becky Silva
Director of Government Relations
California Association of Food Banks



Shimica Gaskins
President & CEO
GRACE/End Child Poverty California