



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

RE: How Have SNAP State Agencies Shifted Operations in the Aftermath of COVID-19?

January 22, 2024

Dear Acting Under Secretary Kumar Chandran and Administrator Cindy Long:

The California Association of Food Banks (CAFB), a non-profit association with 41 member food banks across California 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 - How Have SNAP State Agencies Shifted Operations in the Aftermath of COVID-19 Study. OMB Control Number: 0584-NEW.

Food insecurity in California remains nearly double the pre-pandemic levels and is rising. Today, one in four households in California are facing food insecurity, with deep disparities for communities of color.¹ With the ending of SNAP Emergency Allotments in March of 2023 and the ending of Pandemic-EBT, California has lost one-third of its food safety net, putting a severe strain on families facing hunger.²

We appreciate that FNS is taking this important opportunity to assess what did and did not work during the COVID-19 emergency as well as consider the lessons learned to inform continued program improvement and increase preparedness for future disruptions that affect service delivery.

In addition to our specific comments, **we strongly encourage the inclusion and prioritization of input from stakeholders to ensure lived expertise is equitably centered and included. This should include, but not be limited to, SNAP participants, outreach and application assisters, and the merit workforce. In addition, feedback from County administrators, not just state governments and**

¹ California Association of Food Banks (2023, October). *Food Insecurity Data*. <https://www.cafoodbanks.org/food-insecurity-data/>

² California Association of Food Banks (2023, December). *The Impact of CalFresh (SNAP) Emergency Allotments*. <https://www.cafoodbanks.org/blog/the-power-of-snap-calfresh-emergency-allotments/>

tribes, should be included as they provide unique insight into the successes and learnings during the pandemic response.

Below we outline a number of operational changes made in response to the pandemic that made a significant impact on hunger and poverty in California that we urge be made permanent.

- [Continue to ensure access and customer services when households are in greatest need, through Disaster SNAP](#): streamline and guarantee end-to-end remote access so that the program is truly responsive during times of natural and human-caused disaster:
 - [Adapt D-SNAP](#) to assist disaster victims during disasters like the COVID-19 pandemic and [expand access to hot and prepared foods and Restaurant Meals Program](#).
 - Permanently allow end-to-end remote access in applying for D-SNAP, recognizing that households are dealing with immense housing and transportation hardship and in-person applications are not practical.
- The federal rule that limits Able-Bodied Adults Without Dependents (ABAWDs) to 3 months of CalFresh in a 3-year period unless documenting 20-hours of work a week or meeting an exemption [was waived during the pandemic](#). This change should be made permanent. Research has shown:
 - [There is a 53% overall reduction in program participation when people are subject to work requirements](#).
 - [People with ABAWD status who are cut off from benefits have more serious physical and mental health conditions](#) and their incidence of experiencing physically unhealthy days increases by 14%, while causing [no significant change](#) in employment status.
 - Ensuring those with the greatest barriers to full-time employment do not face hunger will [support them to eat and not face the toxic stress of hunger as they try to find work](#).
- [Emergency Allotments \(EAs\) Substantially Boosted CalFresh Benefits for All Households](#). [California moved quickly to implement CalFresh EAs starting in March 2020](#), benefitting more than 3 million households. In 2021 alone, [EAs helped Californians purchase 1.32 billion meals](#). The impact of EA's cannot be overstated. We urge FNS to reinstate investments in benefit adequacy. Key outcomes of EAs include:
 - More and greater variety of food.
 - EAs helped households weather income fluctuations.
 - EAs had a stabilizing effect on households, allowing CalFresh households to stay current on rent and bills and make progress toward financial stability.
- During the pandemic, FNS allowed State agencies to conduct Quality Control interviews by telephone to aid in case completion. We welcomed USDA's proposal to make telephonic interviews the standard for [improving SNAP's QC](#)

[system](#) and California advocates supported this change in our [public comment](#). We urge FNS to consider our entire comment along with feedback from the California Department of Social Services and stakeholders with lived expertise, when finalizing the provisions to improve the SNAP QC system.

- Two [COVID-19 provisions](#) included in the Consolidated Appropriations Act of 2021 (CAA) allowed a greater number of college students to qualify for SNAP benefits: those eligible for federal or state work-study and those whose families cannot contribute financially to their education. An immense increase in applications submitted by college students due to expanding SNAP eligibility can be shown by data collected by the [Center for Healthy Communities at Chico State](#) (CHC). CHC saw a 306% increase in applications submitted by their 40 college campus subcontractors in federal fiscal year 2021. Continuation of these interventions is critically important to support students. Notably:
 - Recent studies show that [44% of postsecondary students](#) in California are food insecure, and unfortunately, our state agency estimates that only about 18-30% eligible students enrolled in SNAP.
 - [COVID-19 has only worsened hunger among higher education students, with nearly 1 in 4 students becoming less food secure](#), with deep disparities for racial and ethnic minority students.
- We urge the use of USDA authority to permanently improve and streamline customer access. Some of the temporary flexibilities that USDA made available were pursuant to statutory relief enacted by Congress only so long as the PHE was in place, while others were based on FNS' inherent waiver authority. As CalFresh is our best defense against hunger, efforts to increase participation by simplifying the application and renewal process are critical for preventing hunger. For example, [the following waivers](#) were incredibly effective at simplifying the application process for applicants and eligibility workers alike, and FNS should remain open to using more of its inherent waiver authority to allow more practices that proved effective during COVID-19 on a permanent basis:
 - Waiver of Initial Certification Interview
 - Waiver of Requirement to Conduct a Face-to-Face Interview if Requested
 - Waiver of the recording requirement for telephonic signatures
- During the COVID-19 emergency, California participated in a significant number of applicable federal waivers, many outlined above. California used the flexibility provided to serve millions, with a consistently low error rate. We urge making the aforementioned waivers permanent and for USDA to consider waiver alignment across other critical safety net programs like Medi-Cal and CalWORKs, to minimize confusion and administrative burden for families enrolled in multiple benefits programs.

Conclusion

California ranks 46th in the country in CalFresh participation rate with only about [70% of eligible CalFresh participants](#) enrolled; the waivers and policy changes that were made available during the COVID-19 emergency should be made permanent so that states like California can make meaningful progress towards enrolling 100% of its eligible population into SNAP. The California Association of Food Banks and GRACE/End Child Poverty in California have seen the direct and devastating impact of the end of many of the aforementioned critically important interventions. We appreciate the time and energy FNS is putting into understanding states' COVID-19 response and look forward to continued work to improve SNAP adequacy and access. Thank you for the opportunity to submit a comment on *OMB Control Number* 0584.

Sincerely,

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