CLOSING THE SNAP GAP
WHY CALFRESH MATTERS FOR LA COUNTY
## Table of Contents

- Letter from the LA County CalFresh Task Force 3
- Task Force Members 4
- Executive Summary 5
- Task Force Findings 10
- Part I: Partnership Strategies Led by DPSS 10
- Part II: Strategies That Focus on Low Enrollment Regions and Groups within LA County 11
- Part III: Strategies Led by County Stakeholders 12
- Part IV: Federal and State Policy Challenges and Opportunities 13
- Part V: Federal Policy Initiatives That Could Improve SNAP Benefit Adequacy 14
- Part VI: State Policy Opportunities 14
- Call to Action: Raising Our Voice 15
As the conveners of the LA County CalFresh Task Force, we are pleased to present this report outlining our Task Force’s recommendations for increasing enrollment in the federally funded Supplemental Nutrition Assistance Program (SNAP), also known as CalFresh in California.

The Task Force convened multiple stakeholders to discuss how to decrease hunger in the city and county of Los Angeles by maximizing enrollment in CalFresh, the nation’s first line of defense against poverty and hunger. Enrollment in CalFresh has been demonstrated to improve food security and multiple health outcomes; to decrease health care costs, the incidence of chronic disease and poverty; and to positively impact economic development. Currently, approximately 500,000 residents of LA County are eligible but not enrolled in CalFresh, including many working families, older adults, college students and others.

The Task Force, composed of over 30 individuals from the public, private and nonprofit sectors, including anti-hunger community-based partners, government, health, education, food retailers, agriculture, philanthropy and individuals with experiential knowledge of hunger and SNAP, met to explore the barriers to CalFresh enrollment and participation and to identify a series of policies and practices to maximize participation. These recommendations build upon the work of groups such as the CalFresh Advisory Workgroup and other local discussions focused on increasing participation in CalFresh. It is our hope that this report will be used as a tool for further advocacy and action.

Everyone deserves access to affordable, nutritious food. Maximizing CalFresh enrollment and participation is an important strategy to improve access to nutritious food. The implementation of these recommendations will require continued support of multiple sectors and stakeholders working together in partnership and informed by individuals and communities with experiential knowledge of hunger and CalFresh. We thank all the Task Force members for their investment of time and their insights, as well as Target for its support of this work.

Sincerely,

Los Angeles Regional Food Bank
Food Research & Action Center
The Food Trust

Maximizing CalFresh enrollment and participation is an important strategy to improve access to nutritious food.
LA CalFresh Task Force Members

Steve Baker · Executive Director · Grace Resource Center
Regina Birdsell · President/CEO · Center for Nonprofit Management
Robert Boller · Director of Programs · Project Angel Food
Linwood Boomer · Producer/Writer
Jared Call · Senior Advocate · CA Food Policy Advocates
Scott Chan
Ceping Chao · Community Health · Kaiser Permanente
James Don · Assistant Manager · City of Los Angeles Department of Aging
Evelyn Garcia · Vice President, Community Impact · United Way
John Grant · President · UFCW
Michael Green · Regional Director · SEIU
Marianne Haver Hill · Executive Director · Propel LA · LA County Economic Development Corp
Susan Harrington · Executive Director, Communities Lifting Communities
Hector Hernandez · Program Liaison · CA Association of Food Banks
Chidera Izuchukwu · Basic Needs Manager, UCLA Community Programs Office
Justin Joe · Director, Community Health Investment · Providence St. Joseph Health
Claudia Bonilla Keller · Chief Strategy Officer · LA Promise Fund

John Kobara · COO · California Community Foundation
Maribel Marin · Executive Director · 211 LA County
Heather Jue Northover · Director, Center for Health Equity · LA County Department of Public Health
Greg Robinson · Manager, San Pedro Service Center · LA County Workforce, Aging & Community Services
Vanessa Rosales · Director, Corporate Affairs and Government Relations · Food 4 Less/FoodsCo. – The Kroger Company
Antonio Sandoval · Director, UCLA Community Programs Office and Chairperson, UCLA Basic Needs Committee
Maryam Shayegh · Program Manager · LA County Office of Education
Cynde Soto · Californians for Disability Rights · Long Beach
Fred Summers · Senior Director · Jewish Family Services of LA/Sova
Frank Tamborello · Executive Director · Hunger Action LA
Roberta Tinajero · Community Health · Kaiser Permanente
Elizabeth Tulasi · Chief Operating Officer · BizFed
Lara Turnbull · Division Manager, Chronic Disease and Injury Prevention · Long Beach Department of Health and Human Services
Denise Woods-Bevly · Director, Basic Needs Initiative · Cal State University Chancellor’s Office

CONVENING PARTNERS

Brian Lang · Director, Healthy Food Access · The Food Trust
Sarah Yeung · Project Manager · The Food Trust
Kahfii King · Project Manager · The Food Trust
Ellen Vollinger · Legal Director · Food Research & Action Center (FRAC)
Michael Flood · President/CEO · Los Angeles Regional Food Bank
Matthew Sharp · Consultant · Matthew Sharp Consulting

ADVISORS

Antonia Jimenez · Director · LA County Department of Public Social Services
Kim McCoy Wade · Director · California Department of Aging
EXECUTIVE SUMMARY

The Los Angeles Regional Food Bank, Food Research & Action Center and The Food Trust convened the LA County CalFresh Task Force in June 2018. In recognition of the broad impact of CalFresh, Task Force members came from a range of sectors: state and local government, grocery retail, community development, health care, labor, education, civic, philanthropy and hunger advocacy groups.

CalFresh matters for LA County residents’ food security, health and economic well-being. In 2019, LA County CalFresh participants overall received over $1.77 billion in federal benefits that in turn generated more than $2.66 billion in economic activity.

The USDA ERS estimates that $1 of SNAP benefits can generate between $1.50 to $1.80 in economic activity based on economic circumstances. For the purposes of this report, we have used the more conservative figure, however want to note that the higher figure is more appropriate during recessionary periods.

Nonetheless, CalFresh participation rates historically have been low in California and LA County due to various factors, including state restrictive regulations that have been reversed in recent years. Due to positive policy changes and other state and local initiatives, LA County’s CalFresh participation rate increased from 47% in 2010 to 74% in 2018.¹

---

The USDA ERS estimates that $1 of SNAP benefits can generate between $1.50 to $1.80 in economic activity based on economic circumstances. For the purposes of this report, we have used the more conservative figure, however want to note that the higher figure is more appropriate during recessionary periods.

In December 2019, CalFresh provided benefits to 1,198,751 people in 683,756 households in LA County. That represented an increase of 132,668 households since May 2017 when the LA County Board of Supervisors set a goal to increase the CalFresh participation rate by 20% over a two-year period. Contributing significantly to this increase was LA County DPSS’ successful enrollment of many SSI households that a state law change made newly eligible for CalFresh.

The SSI CalFresh transition offers important lessons that can help LA County in reaching the estimated 280,000 LA County households who remain eligible for but are not receiving CalFresh benefits. Approaches that proved effective included developing and disseminating outreach postcards and deploying DPSS personnel to screen and enroll people at neighborhood locations other than DPSS offices.

Building on recent successes provides a clear roadmap to bring the benefits of CalFresh to more LA County residents:

**Technology**
Expansion of call centers and telephone interviews have enabled LA County residents to submit applications online and complete the process by phone. Offering DPSS’s “End-to-End” opportunity countywide will increase applications and retain caseload through modernization and simplification.

**Targeted Application Assistance**
Trusted community partners are key liaisons to underserved populations and neighborhoods. Focusing resources and facilitating CalFresh outreach through health care, education, labor, ethnic organization and other trusted community partners can expand participation.

**Limited English Populations**
Materials, marketing and program rules should be adequately translated and provided to Los Angeles’ sizable non-English-speaking low-income populations. Particularly given the current federal policy environment on immigration-related matters, it is essential to provide LEPs who may be eligible for CalFresh with accurate, accessible information about their rights to apply and participate.

Each year, LA County residents do not receive over $690 million in CalFresh benefits that could help with groceries for children, seniors and families who need help. Since every $1 of CalFresh generates between $1.50 and $1.80 of economic impact, this is equivalent to a loss of approximately $1 billion to $1.2 billion to grocery stores, farmers and other local food retail suppliers.²

Research shows that CalFresh participation:
- increases food security for residents;
- promotes better health outcomes and lowers health care costs;
- ensures lower-income students direct certification for free school meals;
- helps seniors afford both food and medicine;
- spurs demand for food retail stores, especially in underserved neighborhoods;
- assists in disaster preparation and disaster recovery;
- enables households to defray high housing costs; and
- boosts local economic activity.

“Linking our communities to CalFresh is an important part of how Providence St. Joseph Health fulfills our mission to serve the poor and the vulnerable. CalFresh makes healthy nutrition more affordable, which in turn helps to prevent chronic disease, so our health system is doing everything we can to get more families enrolled. There is more to do, but we’re hearing that food resources really make a difference, so we’ll keep helping with our patients and their families with applying for and staying on CalFresh.”

— Justin Joe, Director, Community Health Investment · Providence St. Joseph Health

² http://publichealth.lacounty.gov/CenterForHealthEquity/PDF/LAC%20Housing%20Health.pdf
About the LA County CalFresh Task Force

The LA County CalFresh Task Force was convened in 2018 to identify barriers to higher participation in CalFresh and propose strategies to close the participation gap. The convening partners, composed of Los Angeles Regional Food Bank, Food Research & Action Center and The Food Trust, invited input from the public, private and non-profit sectors, including community-based partners, health sector stakeholders, businesses, and the philanthropic sector. Convening partners sought a diverse group of stakeholders to have a comprehensive dialogue about CalFresh participation challenges and solutions.

Over three meetings, the Task Force discussed three dimensions of CalFresh participation: stakeholder-led initiatives, DPSS business processes, and related challenges facing food-insecure LA County residents. In addition to meeting as a group, the convening partners hosted one-on-one conversations to further engage and gather expertise from participating members. Small group discussions helped identify priority strategies.

Guest speakers shared expertise about particular issues, including the housing crisis, policy proposals affecting immigrant households (including so-called “public charge” rule), and direct engagement of specific demographic subgroups and strategies for more effective outreach.

Special thanks to the California Community Foundation for hosting Task Force meetings.

How CalFresh Works in LA County

CalFresh benefits are funded 100% by the federal government; administrative expenses are shared between USDA and California. CalFresh’s federal structure allows it to quickly expand to respond to changes in need, whether due to economic downturns or natural disasters.

Federal eligibility rules establish income and resource limits for participants. States apply for a variety of options and waivers to vary those rules. Most households in LA County must have a gross income under 200% of the poverty line, or $3,556/month for a household of three. The CalFresh gross income test is 200% of the poverty line. This allows the state to screen more lower-income applicants and determine whether their expenses for other basics like shelter and child care render their net incomes low enough to qualify them for CalFresh benefits.

The California Department of Social Services (CDSS) administers CalFresh and LA County’s Department of Public Social Services (DPSS) is the operating agency for LA County. The USDA’s Food and Nutrition Service (FNS) Western Regional Office provides oversight and guidance to California and other states in the region.

The USDA also provides funds to states for various CalFresh activities:

- Conducting CalFresh outreach and application assistance is supported on a 50/50 federal/state reimbursement basis;
- SNAP-Ed nutrition education is supported based on a federal funding formula;
- Offering Employment and Training on a 50/50 federal/state reimbursement basis as well as through a limited 100% federal allocation.

In addition to the findings detailed above, the Task Force identified a variety of barriers to higher participation in CalFresh:

- lack of information about benefits and how to apply;
- stigma associated with receiving public assistance;
- difficulty completing the application process, including submitting documents and completing in-person interviews;
- perception that household is not eligible due to income;
- mobility issues;
- concern that participation might jeopardize immigration status;
- perception that benefit levels are too low for effort involved;
- getting cut off after enrollment for procedural reasons;
- inconsistent language access and cultural competency;
- misinformation about eligibility;
- lack of technology access;
- customer service issues and difficulty navigating DPSS offices;
- lack of sufficient resources for expanded outreach and application assistance;
- lengthy hold times when contacting DPSS;
- confusing forms and paperwork; and
- termination or reduction of benefits due to an increase in income from an employment status change (i.e. the cliff effect).
Perception and Barriers to CalFresh: Engaging Underserved Communities

The racial, cultural and language diversity of the LA region merits a corresponding breadth and adaptable approach of CalFresh strategies to reach eligible but not enrolled populations. At the second Task Force meeting, Dr. Loan Kim, Associate Professor of Nutritional Science at Pepperdine University, presented findings from a recent study she conducted on perceptions and barriers to CalFresh utilization among Asian Pacific Islanders (API) in Greater Los Angeles. Her study, which engaged participants from four API communities (Chinese, Filipino, Tongan and Vietnamese), documented barriers to CalFresh participation and offered recommendations for improving participation. According to Dr. Kim, hunger among legal immigrants exceeds the rate of the general public, and this population also reports low participation in public assistance programs such as CalFresh.

Key factors limiting CalFresh enrollment included availability of information, complexity of the application process, and shame and pride. The study acknowledged that each ethnic group had unique barriers and differences in perception of CalFresh. Trusted community-based organizations can act as critical gatekeepers and conduct outreach within their local social networks.

Based on Dr. Kim’s presentation, the Task Force discussed ways to promote community-based, customized outreach and communications, and generate additional applied research on a broader sample of eligible but not enrolled households for API and other target populations.

CHALLENGES FACING FOOD-INSECURE LA COUNTY RESIDENTS

Residents of LA County facing food insecurity also face a number of additional challenges, notably housing affordability, federal policy proposals that discourage immigrants from utilizing social services, and natural disasters. By working to increase the rate of participation in CalFresh, the Task Force hopes to collaborate with civic leaders and social sector stakeholders to relieve the negative impacts of these additional pressures that exacerbate food insecurity and hunger in LA County.

Housing Affordability
The most prominent challenge facing the region is the unaffordability of housing. Almost 50% of low-income households in Los Angeles County are considered “severely cost burdened,” meaning that they spend more than 50% of their income on rent and utilities. Solutions to the housing crisis should address the impact of housing costs on households’ food insecurity. Housing leaders can leverage the significant, untapped benefits that CalFresh offers to assist LA County residents struggling to afford both food and shelter.

“With CalFresh now I am able to make wiser decisions and purchase healthier foods as opposed to fast food. I am now available to meal prep a day before and take it to school with me.”
— CalFresh Participant

Serving Immigrant Households
The federal policy context on immigration has contributed to a lower utilization of programs and services by eligible households that include noncitizens. LA County leaders have committed significant resources and attention to protecting immigrants in the LA region.

There are opportunities to maintain immigrant households’ participation in CalFresh and other vital safety net programs by providing accurate information for community leaders to clarify relevant policies. The Task Force supports the significant new


8 | Closing the SNAP Gap
investments in public and philanthropic resources to increase in capacity of nonprofit service providers and local governments whose efforts to connect immigrant households with free and low-cost community legal services providers.

**Helping During Disaster Recovery**
CalFresh plays a critical role helping people and communities recover from natural disasters such as fires, earthquakes, floods, pandemics and more. Disaster CalFresh helps impacted residents quickly access food resources and brings federal dollars into the local economy during recovery. Mobilizing resources to ensure eligible households are enrolled during normal times makes it easier to provide replacement and supplemental CalFresh benefits during a disaster.

DPSS can work with CDSS to obtain federal approval to implement Disaster CalFresh to serve disaster victims not already enrolled in CalFresh, and to allow CalFresh participants to purchase prepared foods at CalFresh-authorized retailers. Stakeholders can partner on application assistance to Disaster CalFresh households.

**FOOD INSECURITY AND THE CALIFORNIA HOUSING CRISIS: BUILDING CROSS-SECTOR ALLIANCES**

LA County is experiencing a housing affordability crisis, along with much of California. It has the second fewest number of affordable housing units for very low income families among major cities in the United States. And the situation is getting worse: LA loses 5½ rent controlled housing units every day. The causes of the crisis are multiple, and include: rapid increases in market rate, an increasing rate and number of evictions in LA, removing apartments from rent control, and limited construction of new affordable housing. This crisis places families in the impossible position of choosing between housing, food and unsustainable commutes to work. After covering rent, utilities and other essentials, people seeking food assistance from food pantries and other agencies typically have less than $100 monthly to pay for their other living expenses.

Larry Gross, Executive Director of the Coalition for Economic Survival (CES), presented to the Task Force on the work of CES, which organizes tenants and has led efforts to pass legislation that would strengthen tenant rights in LA. Mr. Gross noted that the housing crisis has led to pressure on households’ basic needs, including for food, and that CalFresh can help provide dedicated assistance towards groceries that might otherwise go to housing costs.

Mr. Gross emphasized that the housing and food insecurity sectors are stronger together, and that cross-sector alliances are important to amplify and support each other’s priorities. For low-income families, for whom housing and food insecurity are inextricably tied together, support must be holistic.

As the LA region continues to lead the conversation about ways to provide relief and protection for families facing housing and food insecurity, the work of CES and other advocates remind us of the basic human right to a “standard of living adequate for the health and well-being of himself and his family, including food, clothing, housing and medical care and necessary social services” [Article 25 of the United Nations Declaration of Human Rights]. Stronger relationships between anti-hunger advocates and other allied groups working to address poverty can facilitate more significant progress toward shared goals.
Partnership Strategies Led by DPSS

As the administrator of CalFresh in LA County, DPSS leads efforts to increase the rate of program participation. Since 2017, DPSS has tested strategies to improve access to CalFresh among eligible residents, to approve more applications for qualified households, and to maintain cases while participating households are still struggling with low incomes. DPSS details these efforts in its monthly reports to the LA County Board of Supervisors.4

Environmental Strategies

• Partnering with Code For America to offer the GetCalFresh online interface5
• Leveraging the DPSS Customer Service Call Center to initiate CalFresh applications and utilize a telephonic signature from the applicant
• Developing a CalFresh flyer customized for Medi-Cal beneficiaries and included with their Medi-Cal renewal packets
• Developing a CalFresh Assisters Toolkit6
• Deploying DPSS staff to provide CalFresh outreach and enrollment at various sites and events throughout LA County

Retention Strategies to Reduce Discontinuances

• Proactively utilize the Customer Service Center to assist CalFresh participants who are in jeopardy of losing their benefits due to not completing required reports.
• Allow participants to submit their Semi-Annual and Annual Recertification reports online through YourBenefitsNow (YBN) or through the Customer Service Center utilizing participants’ access to smart phones.

The Task Force strongly supports the DPSS CalFresh business process improvement strategies underway. The most promising new activity is the expansion of CalFresh benefits to Supplemental Security Income (SSI) recipients effective June 1, 2019, pursuant to the state law change adopted in 2018. DPSS has focused on available SSI participant data to develop its outreach plan, which offers a good model for developing future efforts to reach other CalFresh eligible populations.

The SSI CalFresh expansion provides a particularly good opportunity to reach seniors currently receiving SSI and also eligible for but not receiving CalFresh benefits. SSI participants may be of any age, but seniors comprise approximately 46% of SSI recipients. Partially due to the State’s prior longstanding policy that made SSI recipients ineligible for CalFresh, California has had the lowest participation rate by seniors of any state. CalFresh participation among seniors has doubled in recent years, and there are significant opportunities to reach more LA County seniors who are eligible but not receiving CalFresh. By November 2019, DPSS had enrolled 160,000 SSI recipients in CalFresh, 66% of the overall goal.

DPSS’s effective use of technology to increase enrollment among SSI households and individuals leverages its ability to access information already available in the agency’s systems. Such cross-program data sharing might be utilized in the future to increase participation among Medi-Cal households and other low-income benefit program participants not enrolled in but likely eligible for CalFresh.

4 https://www.lacounty.gov/sop
5 https://www.getcalfresh.org
II Strategies That Focus on Low Enrollment Regions and Groups within LA County

The Task Force identified the importance of LA County CalFresh strategies targeted to serve under-participating populations and regions. Promising approaches include data driven-outreach, improved language access, program rebranding, and additional investment in application assistance and advocacy.

Data-Driven Outreach
A variety of data sets are available to identify the areas with the most under-enrollment in CalFresh. Web-based mapping tools make it easier than ever to identify and share opportunities to maximize outreach efforts by targeting the ZIP codes with the lowest participation rates. In addition, other government and academic data point to the need for continued focus on people experiencing homelessness, foster children, college students and immigrant households.

Language Access
Public benefits programs in California provide application materials and assistance in multiple threshold languages. Signage and translation systems are available to help close language gaps by connecting applicants to a translator who speaks their native tongue. Despite these tools, CalFresh observers and local residents recommend that CDSS lead language access initiatives through its statewide administrative role, by ensuring language access that is:

- Built into all access channels, especially with California counties offering more services over the phone and online. For example, for “call” (bilingual staff and interpretive services), “click” (translated web and texts), and “come in” to an office (paper applications/reports and bilingual staff).
- Available in the many formats needed to serve diverse populations, such as large print, digitally readable, Braille for vision impairment and 711 relay for hearing/speech impairments.
- Built into systems, such as those generating automated CalFresh notices in the computerized eligibility system that is being revamped by 2021.
- Taking into account input from constituents and community representatives to lead to more effective improvements to language access and better implementation on the ground.

Marketing CalFresh
In order to develop impactful messages, CalFresh leaders should convene community partners to listen to local residents, former participants and current participants, to assist with rebranding and marketing of CalFresh.

An effective communications campaign with culturally relevant, multi-platform approaches can also combat misperceptions and stigma about CalFresh. This involves establishing a consistent presence on radio and television and social media outlets, including Instagram, Facebook en Español, Weibo, WeChat and WhatsApp. Messages can highlight CalFresh’s positive impacts on individual and population health, as well as on the local economy, which supports jobs in neighborhoods.

“CalFresh has helped me tremendously. Now I am able to purchase fresh produce and healthy foods.”
— CalFresh Participant

Invest in Targeted CalFresh Application Assistance
More evaluation on the effectiveness of application assistance strategies can help guide the best use of new investments for outreach initiatives. Although some federal matching funds are available, there are substantial gaps in the capacity of health providers, schools and community-based organizations to provide application assistance to more eligible non-participants. Additional investments from business and philanthropic sectors, as well as from the public sector, can help build the capacity of local organizations in particular underserved neighborhoods, as well as organizations that reach specific populations, to take new steps to ensure families across LA County are informed about and supported to enroll in CalFresh.
Strategies Led by LA County Stakeholders

Leveraging the skills, resources and capacities of Task Force members and others in their sectors can help to close the CalFresh participation gap.

The Task Force included representatives from labor, retail, universities, hospitals, food pantries, K-12 schools, higher education institutions and other stakeholders. They discussed ways to engage their respective constituencies by customizing CalFresh education and application assistance to meet the needs of their clients, neighborhoods and stakeholders.

Future strategies should include:

**Listening**
Convene focus groups with low-income LA County residents to better understand procedural and cultural barriers to applying for and maintaining CalFresh benefits. Apply the research results to inform CalFresh business processes, as well as micro-targeting of CalFresh outreach efforts to reach EBNE population. Universities and colleges can be helpful as partners and resources in convening focus groups and synthesizing the findings.

**Convening**
Connect sector leaders with experienced CalFresh practitioners who can provide information about starting or expanding CalFresh outreach and application assistance work. The Center for Nonprofit Management has offered to host a convening to help bring in new business, nonprofit and other partners to assist with closing the CalFresh participation gap.

**Training**
Develop a training curriculum to reach particular subpopulations. Ensure that relevant policies are correctly explained and outreach messages are accurate and appropriate for the target population.

**Portal**
Add relevant new materials to DPSS’s CalFresh Outreach Toolkit portal. The materials library with best practices and contact information can promote effective stakeholder and community engagement. Basic “how-to” instructions can be distributed through the websites of associations, coalitions and networks.

“With CalFresh I do not have to worry about making a decision between purchasing food or books. It has become a huge stress reliever.”
— CalFresh Participant

**Advocacy**
Making CalFresh a higher priority for more stakeholders and coordinating advocacy efforts among them can provide the support necessary for improving LA County CalFresh participation rates further. LA Regional Food Bank will continue engaging civic, nonprofit and business partners to identify opportunities for stakeholders to support CalFresh.
Federal and State Policy Challenges and Opportunities

The prospects for closing the CalFresh Gap in LA County are strongly shaped by federal and state policy choices. Recent USDA rulemaking threatens to make fewer people eligible for CalFresh. At the same time, there are federal and state policy changes under consideration that could streamline enrollment, make CalFresh benefits more robust, and lessen the “cliff impact” on benefits as minimum wages rise and workers have higher earnings.

The following proposed federal changes would undermine CalFresh access and participation:

**Eliminating CalFresh for Many Needy Adults**
USDA has proposed changing access to CalFresh for many low-income adults who are unemployed or underemployed and unable to document sufficient weekly work hours. USDA's new policy also undercuts states' ability to carry forward accumulated exemptions that states and counties can use on a case-by-case basis to protect participants from a three-month time limit. Among those populations at risk are people who are homeless.

Under this change, LA County is less likely to qualify for an area waiver of the time limit or have as many individual exemptions to use on a case-by-case basis. Currently, more than 100,000 public comments regarding the change have been submitted to USDA. Nonetheless, USDA aims to implement the change as early as April 1, 2020. Litigation has been filed asking courts to declare the change unlawful and prevent it from being implemented.

**Imposing Asset Tests and Lowering Gross Income Eligibility Threshold**
Currently in LA County and elsewhere in California, applicants for CalFresh are eligible regardless of assets and may be screened for benefits if they have gross incomes up to 200% of the Federal Poverty Level (FPL) to determine if they have expenses for basics such as shelter and child care that render them eligible for a CalFresh benefit.

A USDA proposed rule would undo California’s option to eliminate the asset test and lower the gross income test to the amount set in federal statute (130% FPL). Additionally, children in the CalFresh households that lose Cal Fresh eligibility also would lose free school meals. More than 183,000 public comments on the proposed rule were submitted.

**Heat and Eat**
Another USDA proposed rule that would change the way that households’ utility expenses are calculated for SNAP purposes would result in a cut to SNAP benefits nationally by $4.5 billion over five years; in California, one in four CalFresh households would be expected to see significant cuts to their monthly benefits. More than 125,000 public comments on the proposed rule were submitted.

“Gracias a CalFresh, ahora puedo comprar alimentos saludables y no tengo que preocuparme en como voy a pagar mis medicinas.”
—
“Thanks to the CalFresh program, now I can purchase healthy food and do not have to worry about how I will pay for my medicine.”
— CalFresh Participant

**Immigrant-Based Intimidation**
The Department of Homeland Security has issued a final rule changing “public charge.” Public charge is a long-standing doctrine that can affect an immigrant’s ability to be admitted to the United States or obtain lawful permanent resident (LPR) status (a green card). Under the new public charge policy, not only cash programs (SSI and TANF) and publicly funded long-term care, but also CalFresh and some other programs could be considered. More than 260,000 public comments were submitted during the proposed rule phase. The change is likely to exacerbate confusion and fears that keep some eligible immigrants from accessing CalFresh. Litigation filed in 2019 is asking courts to find that the rule change is unlawful.
**Federal Policy Initiatives That Could Improve SNAP Benefit Adequacy**

Federal SNAP benefits are based on an outdated formula that results in relatively meager benefit levels for participants. Low benefit levels don’t provide households with enough resources for a healthy diet throughout the month and may lead some eligible people to think that the time and paperwork needed to enroll in CalFresh are not worth the benefit amount.

Federal initiatives to improve benefit adequacy include pegging benefits to the Low Cost Food Plan rather than the Thrifty Food Plan; increasing the minimum monthly benefit; and removing the cap on the shelter deduction. The latter change would be of particular importance to LA County families with children, who, despite residing in a high-cost area, cannot have all their excess shelter costs taken into account.

“CalFresh has helped me keep food in my fridge for my kids and I am grateful for that.”
— CalFresh Participant

**State Policy Opportunities**

California can take additional steps to improve CalFresh customer service, including by providing translated applications and other materials and increasing the degree to which user experience informs the development of CalFresh tools, materials and procedural priorities.

California can invest funds to supplement federal CalFresh benefits for those at the minimum monthly benefit, as the District of Columbia, Maryland and New Mexico do. California also could supplement federal CalFresh benefits for working families with children as Maine does.

California can invest funds to support more robust CalFresh outreach and application assistance efforts, activities for which the state would be reimbursed by USDA on a 50/50 basis. Currently, California partners with nonprofit groups to conduct outreach but only draws down a fraction of federal outreach funds available because the state does not invest state funds along with the resources that community groups provide.

By comparison, New York State invests state funds for its SNAP Nutrition Outreach and Education Program (NOEP) that operates in nearly every county in New York State and throughout all boroughs of New York City.
At the same time, LA County residents are facing economic hardship, natural disasters, housing unaffordability and chronic homelessness. While opportunities exist to expand and improve program access and effectiveness at the state and federal levels, challenges also threaten the integrity of the program. In this environment, building alliances of mutual support and elevating locally driven priorities are critical to protecting the right to food for families and individuals in LA County.

CALL TO ACTION: RAISING OUR VOICE

There is an unprecedented local focus on CalFresh and the support it provides to families the choice between paying for rent or food. At the same time, LA County residents are facing economic hardship, natural disasters, housing unaffordability and chronic homelessness. While opportunities exist to expand and improve program access and effectiveness at the state and federal levels, challenges also threaten the integrity of the program. In this environment, building alliances of mutual support and elevating locally driven priorities are critical to protecting the right to food for families and individuals in LA County.
Food Research & Action Center (FRAC) is the leading national nonprofit organization working to eradicate poverty-related hunger and undernutrition in the United States. Founded in 1970, FRAC provides coordination, training, technical assistance and support on nutrition and anti-poverty issues to a nationwide network of advocates, service providers, food banks, program administrators and participants and policymakers. To learn more about FRAC, visit www.frac.org.

The Food Trust, founded in 1992, strives to make healthy food available to all. Working with neighborhoods, schools, grocers, farmers and policymakers, The Food Trust has developed a comprehensive approach that combines nutrition education and greater availability of affordable, healthy food. To learn more about The Food Trust, visit www.thefoodtrust.org.

Since 1973, the Los Angeles Regional Food Bank has worked to mobilize resources in the community to alleviate hunger. To fulfill its mission, it sources and acquires food and other products and distribute to needy people through charitable agencies or directly through programs; energizes the community to get involved and support hunger relief; conducts hunger education and awareness campaigns and advocate for public policies that alleviate hunger. To learn more about the Los Angeles Regional Food Bank, visit www.lafoodbank.org.

ACKNOWLEDGMENTS
This report was prepared by Michael Flood of LA Regional Food Bank, Matthew Sharp of Matthew Sharp Consulting, Ellen Vollinger and Randy Rosso of Food Research & Action Center, and Sarah Yeung, Kahfii King and Brian Lang of The Food Trust. Members of the LA CalFresh Task Force provided valuable input. This report was made possible by support from Target.