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The Honorable Diane Feinstein U.S. Senate Washington, D.C. 20510

The Honorable Nancy Pelosi Speaker U.S. House of Representatives Washington, DC 20515 The Honorable Kamala Harris U.S. Senate Washington, D.C. 20510

The Honorable Kevin McCarthy Minority Leader U.S. House of Representatives Washington, DC 20515

July 18, 2020

Dear Senator Feinstein, Senator Harris, Speaker Pelosi, Minority Leader McCarthy, and all members of the California Congressional Delegation:

Our organizations write to you in unity with an urgent update and request for your engagement with the USDA regarding significant, harmful changes to the Supplemental Nutrition Assistance Program (SNAP), known as CalFresh in California.

On July 16<sup>th</sup>, the California Department of Social Services (CDSS) notified Counties that the United States Department of Agriculture (USDA) Food and Nutrition Services (FNS) had denied California's request to continue to waive the interviews required at application and recertification. Up to this point during the pandemic, counties have been able to waive these interviews, provided that necessary criteria were met to complete the application or recertification process.<sup>1</sup>

By taking this action, the USDA is sending a message to California and other states that it is time for states to "transition" back to normal operations. Unfortunately, however, with the COVID crisis worsening across California and much of the rest of the nation, we need more flexibility in program operations, not less.

Therefore, the CDSS has had to direct Counties to resume interviewing all households applying or recertifying no later than August 1st. This will significantly harm millions of low-income Californians who rely on SNAP to eat and create an unrealistic requirement for our administrators, the county human services agencies and their staff, who operate the program on behalf of the state and federal government. Because SNAP is a key driver of economic activity and job creation across the food system, this sudden and premature change also threatens our recovery at a pivotal moment for the economy<sup>2</sup>, including in every Congressional District across the state.<sup>3</sup>

As you are likely aware, requiring applicants complete an interview is the single largest barrier to CalFresh for otherwise eligible households even in times when a global pandemic and resultant economic shutdown are not occurring. Interviews also represent one of the largest uses of administrative time during the application and recertification process. Waiving interviews has provided the critical flexibility counties need in order to pivot and meet the increasing demand for CalFresh benefits within their existing (or in many cases reduced) staffing resources and considering the

 $<sup>^{1} \,</sup> https://cdss.ca.gov/Portals/9/Additional-Resources/Letters-and-Notices/ACWDL/2020/ACWDL-071620.pdf.$ 

<sup>&</sup>lt;sup>2</sup> https://www.ers.usda.gov/webdocs/publications/93529/err-265.pdf?v=4472.8.

<sup>&</sup>lt;sup>3</sup> https://calbudgetcenter.org/wp-content/uploads/2020/04/CA Budget Center CalFresh FS 042020.pdf.

constrained phone technology. What's more, many county social workers who would conduct the interviews remain working from home and applicants are applying from home environments, making privacy during an eligibility interview more difficult to achieve.

At the same time this waiver is denied an extension, we will be facing a 'perfect storm' of other factors, including:

- Counties are already processing the <u>record volume of SNAP applications</u> given the unprecedented unemployment that has caused widespread food insecurity across the state;
- Many more Californians will be newly eligible and applying for SNAP as Pandemic Unemployment Compensation ends, putting even more pressure on phone lines and call centers;
- The temporary suspension of mid-period reports and annual recertifications has already ended, and counties will soon be faced with doing double the volume of recertifications to process those that were temporarily delayed from March through May;
- Through all of this, county eligibility workers must navigate the difficulties of operating with reduced capacity and working remotely to maintain social distance and follow other public health precautions. Without access to schools and/or child care centers, many county workers are faced with the need to juggle work and child care responsibilities, further reducing workforce capacity, just as most of those applying for and attempting to maintain benefits are facing similar challenges.

All of this will hit hardest on low-income Californians, many of whom are essential workers and are continuing to work through the pandemic. These families and individuals have the least time to schedule and participate in interviews, putting them at the highest risk to not complete their application, or fall off the program when their recertification is due. That will worsen the already astronomical hunger rate of 23.6%, with the injustice that more than 30% of Black and Latinx households face hunger today.

Attorney General Becerra, along with 21 other Attorneys General led by the District of Columbia, has already written to the USDA urging it to approve these waivers and rightly dispute the notion that it is safe or even possible to transition back to normal operations (see attached).

We ask that you do all you can to urgently reinforce this request as soon as possible. We stand ready to help support that with data, client and county stories, and any other information you may need. As always, we thank you for your bold leadership against hunger.

Sincerely,

California Association of Food Banks
California Food Policy Advocates
Central California Food Bank
Community Action Partnership of Orange County
Community Resource Center of San Diego
County Welfare Directors Association of California
Emergency Food Bank of Stockton
Feeding San Diego
FIND Food Bank
Food Bank of Contra Costa & Solano Counties

Food Bank of Santa Barbara County

Food for People, Inc.

**FOOD Share of Ventura County** 

Health Center Partners of Southern California

Hunger Advocacy Network

Imperial County Food Bank

Los Angeles Regional Food Bank

OC Food Bank

Redwood Empire Food Bank

Sacramento Food Bank & Family Services

San Diego Food Bank

San Diego Food System Alliance

San Diegans for Healthcare Coverage

San Diego Hunger Advocacy Network

San Diego Hunger Coalition

San Diego Organizing Project

Second Harvest Food Bank of Orange County

Second Harvest Food Bank of Santa Cruz County

Second Harvest of Silicon Valley

SF-Marin Food Bank

SLO Food Bank

Somali Family Service of San Diego

St. Anthony's Foundation

Western Center on Law & Poverty

Yolo Food Bank

CC: all California members of the House of Representatives