



## County Welfare Directors Association of California

925 L Street, Suite 350, Sacramento, CA 95814 (916) 443-1749

Frank J. Mecca, Executive Director

Washington, DC Office

Tom Joseph

Waterman & Associates

900 Second Street NE

Washington, DC 20002

(202) 898-1446

tj@wafed.com

October 29, 2013

Dear California Congressional Delegation:

As House and Senate conferees to the 2013 Farm Bill (H.R. 3102; S. 1947) begin to reconcile the differences in the nutrition sections, the County Welfare Directors Association of California (CWDA) urges that conferees reject any changes to the Supplemental Nutrition Assistance Program (SNAP/CalFresh) which have the effect of reducing benefits or which restrict state and county flexibility in administering the program. Our Association represents the human services directors from each of California's 58 counties. Their agencies administer CalFresh. CWDA's mission is to promote a human services system that encourages self-sufficiency of families and communities and it is with that mission in mind that we take the positions outlined below.

More than four million Californians participate in CalFresh. Approximately \$7.1 billion in benefits are issued annually. Since 2007, the program responded quickly to serve financially-stressed families during the severe recession, with the caseload growing by 84 percent. The number of participants is expected to decline as the state's economy improves.

CWDA opposes the cuts contained in the House bill, which would reduce SNAP spending by \$39 billion over ten years. SNAP savings in the House measure are ten times greater than the Senate counterpart. Any cuts to SNAP would prove devastating for children, families and individuals in our communities who depend on the program to prevent hunger, and who are already struggling to make ends meet.

**Broad-Based Categorical Eligibility:** CWDA opposes the House provision to severely restrict the use of this long-standing administrative tool which enables California and 39 other states to employ a set of policies that make a SNAP applicant eligible based on involvement with other low-income programs. The House would restrict categorical eligibility to only those households receiving cash assistance from programs such as TANF/CalWORKS, SSI or a general assistance program. If enacted, the Congressional Budget Office (CBO) estimates that 2.1 million individuals nationwide would lose eligibility in FY 2014.

**Eliminating Waivers for Childless Adults:** CWDA opposes the House provision to immediately end waivers to states allowing them to continue SNAP benefits for longer than three months for single, childless adults during times of high unemployment. For at least the last 16 years, Republican and Democratic administrations have granted such waivers. The 1996 law enacting the Temporary Assistance for Needy Families program limits SNAP benefits for three months every three years for able-bodied adults without dependents (ABAWDs) between ages 18 and 50 unless they are working at least 20 hours a week or

participating in an employment and training program. CBO estimates that the immediate termination of this waiver authority would end assistance to 1.7 million individuals. In California, this provision may affect approximately 369,000 people (or 8.7% of the total CalFresh population), many of them returning veterans and former foster youth.

**Coordination of Low-Income Home Energy Assistance Program (LIHEAP) Benefit:**

Just this past January, California joined the District of Columbia and other 14 states in using the state option to count a LIHEAP payment made to a household to enable them to the full standard utility allowance when determining the SNAP eligibility and benefit levels. This administrative provision is similar to categorical eligibility since it reduces administrative costs and increases SNAP benefits to needy individuals and families.

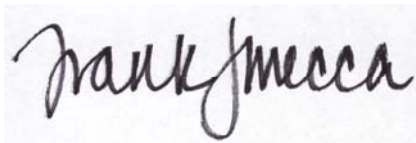
CWDA opposes provisions in both the House and Senate bill which would limit a state's ability to apply the LIHEAP payment when calculating a SNAP benefit. CBO estimates that the House provision would reduce SNAP benefits to about 1.7 million individuals who would see their household benefit cut by an average of about \$90 a month. The federal savings amount to \$8.7 billion over ten years, while a similar Senate provision would cut \$4.1 billion from the program.

**Quality Control Threshold:** CWDA opposes the House provision to lower the quality control (QC) error threshold from the current \$50 improper payment to \$25. Administration of the SNAP program has improved considerably over a number of years and it is now one of the most efficiently operated federal programs, with the error rate amounting to only two percent of benefits. Lowering the threshold will increase greatly the time and resources counties and states would have to invest to identify and correct these relatively small numbers of errors. If this provision and other administrative restrictions proposed by the House are enacted and increase the level of administrative errors in the state, California's counties are liable for paying any federal QC fiscal sanctions.

**SNAP Ban for Certain Ex-Offenders:** CWDA opposes both the House and Senate provision instituting a life-time ban on receipt of SNAP for ex-felons who served their sentences for certain violent crimes and complied with all other terms of their release. The provision requires SNAP applicants to certify in writing as to whether anyone in the household has been convicted of one of those crimes, imposing another administrative burden on the families and county staff and penalizing ex-offenders after they have paid their debt to society.

Thank you for your attention to our views. If you have any questions, please contact Tom Joseph, Director of CWDA's Washington Office at 202.898.1446 or [tj@wafed.com](mailto:tj@wafed.com). You may also reach Cathy Senderling-McDonald, CWDA's Deputy Executive Director at 916.443.1749 or [csend@cwda.org](mailto:csend@cwda.org).

Sincerely,

A handwritten signature in black ink that reads "Frank J. Mecca". The signature is written in a cursive, slightly slanted style.

Frank J. Mecca  
Executive Director