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October 25, 2013

The Honorable Debbie Stabenow
Chairwoman
Senate Committee on Agriculture,
Nutrition and Forestry
328A Russell Senate Office Building
Washington, D.C. 20510

Dear Chairwoman Stabenow:

On behalf of the County of Los Angeles Board of Supervisors, I am writing to urge that eligibility, benefits, and State and local flexibility under the Supplemental Nutrition Assistance Program (SNAP) not be reduced in the 2013 Farm Bill or any other bill, which would reauthorize SNAP.

This program is our nation's most important anti-hunger program for low-income families and individuals. Approximately 4.2 million low-income persons in California receive food assistance through SNAP, including more than 1.1 million Los Angeles County residents. Preserving SNAP benefits and funding is especially important in California, which has not yet recovered from the deepest economic downturn since the 1930s. The State's current unemployment rate still is nearly 9 percent -- far higher than the less than 5 percent pre-recession unemployment rate. According to the Census Bureau, California also has the nation's highest poverty rate (23.5 percent), using its new supplemental measure of poverty that takes into account government resources (including SNAP benefits) received by individuals and geographical variations in housing costs.

We are greatly concerned that the House-passed SNAP reauthorization bill (H.R. 3102) would reduce SNAP spending by an estimated \$39 billion over 10 years -- 10 times more than the reduction in the Senate-passed Farm Bill (S. 1947). The net effects of the House provisions would be to significantly reduce SNAP benefits for many low-income families and individuals while, at the same time, increasing the complexity and costs of program administration. In California, counties administer SNAP under the State's supervision. **The County urges that Congress reauthorize SNAP without reducing eligibility, benefits, or State and local flexibility, including:**

- State option for broad-based categorical eligibility, which enables 43 states (including California) to extend SNAP benefits to low-income persons who receive non-cash Temporary Assistance for Needy Families (TANF) benefits without also determining their financial eligibility for SNAP. Besides simplifying program rules and reducing

administrative costs, it prevents many low-income families from being denied SNAP benefits because SNAP, but not TANF, limits eligibility to families with assets under \$2,000 -- a very low limit which has not been adjusted for inflation in more than 25 years. The House bill eliminates this state option, but it is maintained under the Senate bill.

- State waivers of work requirements for abled-bodied adults without dependents ("ABAWDs") between ages 18 and 50 who live in areas with high unemployment. The House bill would eliminate such waivers while the Senate bill would continue them. If the waivers are eliminated, these adults would be limited to no more than three months of SNAP benefits every three years unless they are working at least 20 hours per week or participating in a qualifying employment and training program. Due to the lack of sufficient employment and training opportunities, this would result in the loss of SNAP benefits for many, if not most, jobless adults in high unemployment areas, such as Los Angeles County. Neither bill provides any additional funding for SNAP employment and training services.
- State option to count any Low Income Home Energy Assistance (LIHEAP) payment as a standard utility allowance (SUA) that is deducted from a household's income in computing SNAP benefits in lieu of actual documented utility costs. Similar to categorical eligibility, this option simplifies program administration and reduces administrative costs while also increasing SNAP benefits received by LIHEAP recipients. Both versions would change the treatment of LIHEAP payments in a manner which would reduce SNAP benefits with the House bill reducing SNAP benefits by an estimated \$8.7 billion over 10 years, compared to \$4.1 billion under the Senate bill.

The County also requests that the current threshold for a quality control (QC) error under SNAP not be reduced from \$50 to \$25, as proposed in the House bill. Lowering the threshold, in effect, would increase QC error rates unless significantly more administrative resources were invested to minimize relatively small errors. Moreover, if House provisions to eliminate current state options for categorical eligibility and the treatment of LIHEAP payments also were enacted, determining eligibility and benefit levels would be far more complicated, costly, and prone to small dollar errors. If all of these changes were to increase California's error rate to a level that makes it subject to QC fiscal penalties, under current State law, such penalties would be passed through to counties.

Your consideration of this important request is greatly appreciated.

Sincerely,



MARK RIDLEY-THOMAS
Chairman, Board of Supervisors