

# CalFresh Update

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**Report to the County Family and Human Services Committee  
September 23, 2019**

**Prepared by:**

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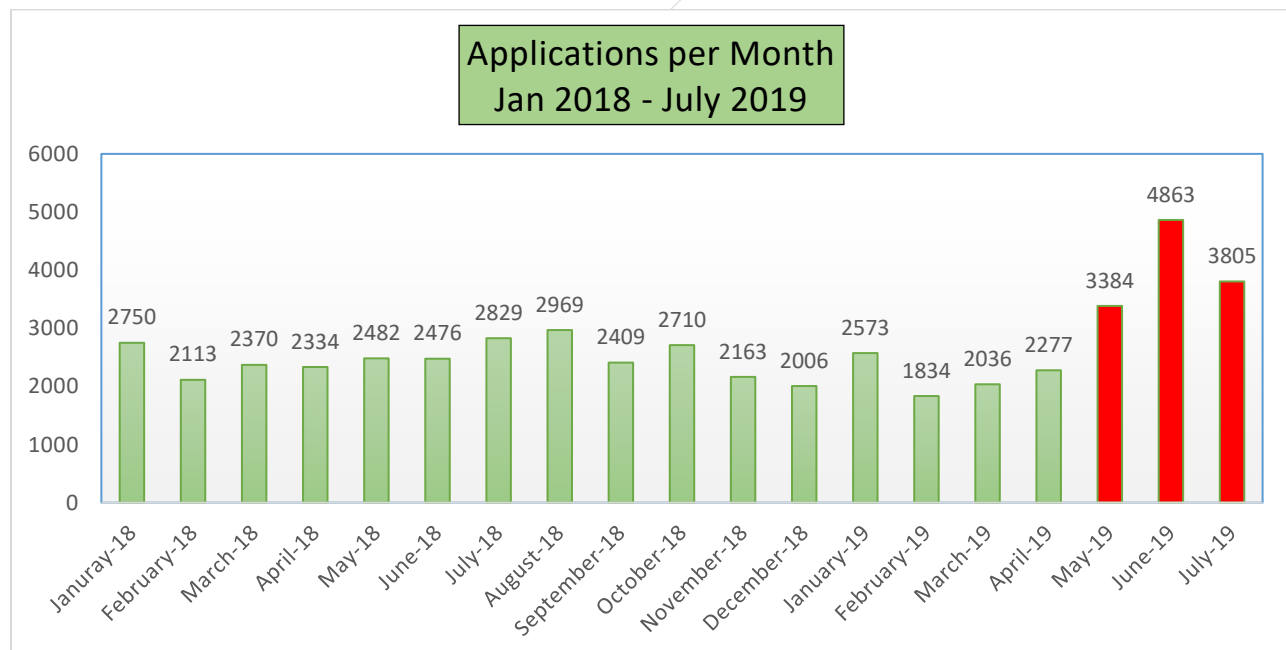
## CALFRESH UPDATE

### I. Overview

The CalFresh program, formerly known as Food Stamps and federally known as the Supplemental Nutrition Assistance Program (SNAP), is for people with low income who meet federal income eligibility rules and want to expand their budget to put healthy and nutritious food on the table. The program issues monthly electronic benefits that are used to buy most foods at many markets and grocery stores.

The CalFresh program helps to improve the health and well-being of qualified households and individuals by providing them a means to meet their nutritional needs. At the federal level, the United States Department of Agriculture's (USDA) Food and Nutrition Service (FNS) administers the program. In California, the CalFresh program falls under the California Department of Social Services (CDSS) and is administered at the local level by the Employment and Human Services Department (EHSD).

In Contra Costa County, the Employment and Human Services Department (EHSD) serves 31,035 households and 60,000 individuals monthly. CalFresh puts almost \$8.0 million into the local economy each month. As indicated by the USDA, research shows that every \$1 provided in CalFresh benefits generates \$1.79 in economic activity. For Contra Costa County, that was \$14.32 million into the local economy over the past year. This economic stimulus is almost exclusively Federal and State funded and provides an important local boost to our economy. CalFresh benefits help families stretch their food dollars to buy healthier foods for the whole family.



***From January 2018 through July 2019, an average of approximately 2,660 applications were submitted monthly. In May 2019, newly eligible SSI (Social Security Income) recipients began applying for benefits (noted above in red). This programmatic change is also known as CalFresh Expansion.***

## **II. Eligibility for CalFresh**

Households that include single individuals, couples, or families are eligible for CalFresh benefits if they meet certain income criteria and legally reside in California. For some CalFresh beneficiaries under the 200% FPL, eligibility is not asset-based or resource-based which means their property is not counted. New proposed legislation may affect these households, and changes to property limits may soon affect our families. This proposed change will be outlined in VII - Legislation and Policy of Interest.

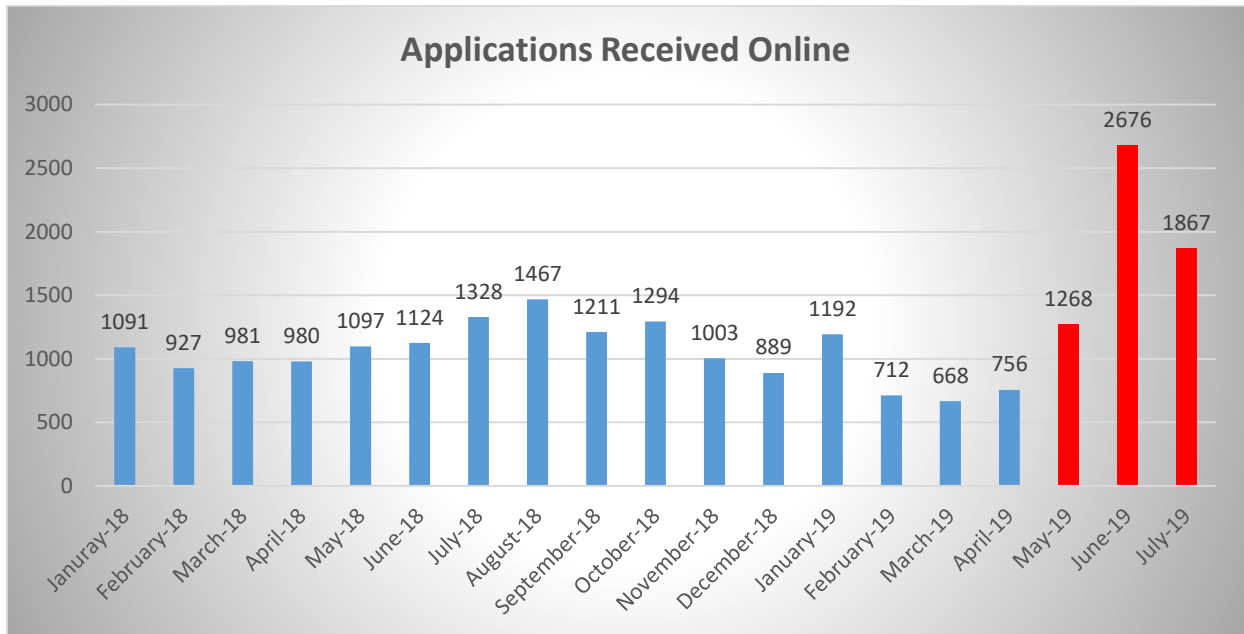
The amount of benefits a person receives depends on the number of people in the household who purchase and prepare food together, and how much monthly income is left after certain expenses are deducted. Income consists of earned and unearned income. Expenses like rent, utilities, dependent care and certain medical expenses are allowable deductions. For example, a household of one (1) with no income would be eligible to receive \$192.00 a month in CalFresh benefits and a household of 10 with no income would receive \$1,441.00 a month.

## **III. Program Accessibility**

Over the last several years, in order to make CalFresh benefits more readily accessible to County residents and families, the Department has increased its efforts in working with the Food Bank of Contra Costa and Solano County as well as other community agencies dedicated to the CalFresh eligible population. As listed below, these efforts have contributed to the success of our expanding benefits to those in need of food security.

- The application process has been made easier by eliminating the requirement to apply through a face- to- face interview process. A telephone interview is now acceptable at both intake and recertification. A customer may still request a face- to- face interview if they are more comfortable meeting directly with an Eligibility Worker.
- Use of telephonic signature is being utilized for annual reviews at the Medi-Cal CalFresh Service Center (MCSC) and is coming soon to all intake units.
- Individuals applying online are no longer required to produce a wet signature on applications. Not only does this simplify the CalFresh application process but expedites the granting of the application and saves money by eliminating mailings.
- Applicants can apply for CalFresh benefits on-line through the My Benefits CalWIN.org portal (MyBCW). Many of our community-based partners have received orientations/trainings on assisting individuals through this on-line application process. In addition, Community Based Organizations (CBOs) can register their organizations as vendors in CalWIN, allowing the CBOs to track the number of applications they register. For PY 2018/19 we received 1,553 applications via MyBCW. Thus far, in PY 2019/20, we have received 1,543 applications. Based on these numbers we are on track to almost double the number of applications received in PY 2018/19.
- To further support the Food Bank and other CBO efforts to assist clients directly, EHSD has provided CalWIN read only access. This will allow designated staff to review case status, remind clients of their appointments, advise them of missing paperwork or verifications, etc.
- The Get CalFresh portal is another online access point for individuals to apply for benefits. This portal is easily accessible to any individual online and requires very little information to begin the CalFresh application process. In 2018, we received 10,531 applications via Get CalFresh.

- Beginning June 2019, we are receiving an average 1,300 electronic applications per month due to the newly eligible SSI recipients.



#### **IV. Current CalFresh Service Levels and Program Performance**

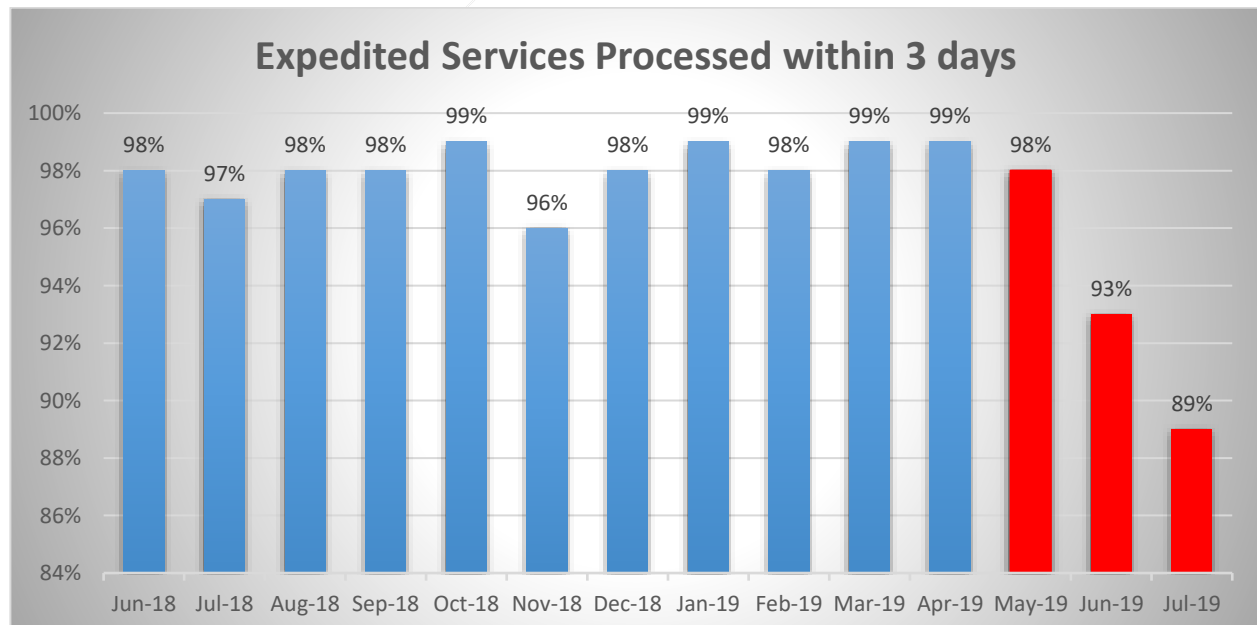
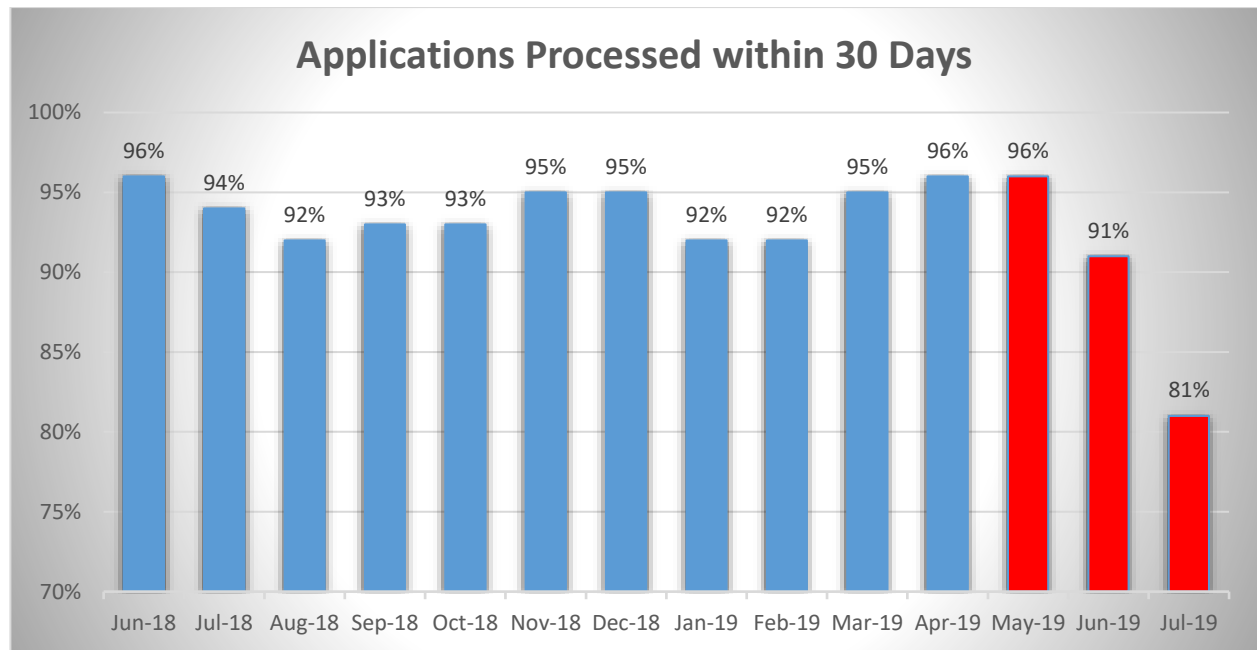
##### Service Levels:

During PY (Program Year) 2017/18, the monthly average of individuals (families and single households) who were in receipt of CalFresh benefits was 59,136 and 48% of these individuals are children. This is approximately a 9% decrease in the monthly average of individuals from the previous program year.

##### Program Performance: Timeliness Processing Standards

FNS requires states and counties to maintain certain performance measures for the timely processing of CalFresh applications. These measures require that 90% of all applications received be processed within 30 days and requires a three (3) day processing period for those CalFresh applicants who we determine require Expedited Services (ES).

We continued to meet the 30-day CalFresh application-processing standard of 90% for PY2017/18 with 97% of applications processed within the 30-day processing requirement through June 2019. During this same period, we achieved a 98.71% average of processing ES applications within three (3) days. CalFresh Expansion has affected our ability to maintain the 90% processing standard of ES in three (3) days and applications in 30 days during the months of July and August 2019. We anticipate being in compliance by October 2019.



The Department reviews the denied applications and the reasons for the denials. The reviews assist with identifying training needs and increasing participation and approval ratings. The top reasons for denial are failure to keep scheduled intake interviews after multiple contacts, failure to provide verification, over income limits, not a separate household, ineligible student, and withdrawn application. In July, the Department had a 69% approval rate, 27% denial rate and 4% of applications were withdrawn. Of the 27 % that were denied, 20% of those were deemed ineligible where the other 80% were denied for procedural reasons including missed appointments, loss of contact, and failure to provide documents. Individuals can contact the department within 30 days of their denial notice to reschedule or provide what is needed to determine eligibility.

#### Management Evaluation (ME)

As mandated by the FNS, the California State Department of Social Services (CDSS) is required to conduct a Management Evaluation (ME) review of Contra Costa County's administration of the CalFresh Program. The federal priority areas of the ME for FFY 2019 were Program Access, Customer Service, Timeliness of Application Processing, Payment Accuracy, Quality Control and Training. The ME review was conducted October 15 – 19, 2018.

CDSS observed and interviewed staff at the Medi-Cal CalFresh Service Center (MCSC), Central Mailing Unit, Benefits CalWIN, and our Ellinwood and Richmond District Offices. CDSS complimented the County for excellent customer service and our timeliness granting expedited services.

During the exit interview, CDSS noted thirteen findings. All findings required minimal effort to correct, as they were related to providing informational notices and forms to individuals who are denied CalFresh services at application.

Our next ME is scheduled for December 2 - December 6, 2019.

#### CalFresh Error Rate

Every month in every county, FNS selects a random sampling of CalFresh cases that are reviewed for case errors involving miscalculations of income or household composition, which result in benefit issuance errors. Our Quality Control (QC) Unit reviews the cases that have been selected and determines our CalFresh error rate. The cumulative (rolling) error rate is from the beginning of the federal fiscal year through the current month and ending in September. The error rate percentage is derived from the number of cases reviewed and the dollar amount of the errors cited. QC reviews are always several months behind in the calendar year, currently we have been reviewed through April 2019.

The cumulative error rate in for FFY 18/19 (October 2018-April 2019) was 3.76% which is well below the State average of 5.79%.

CDSS reported that California would not be sanctioned for last FFY 17/18 even though California's average error rate was 7.25% and over the National average. California is ranked 31<sup>st</sup> in the Nation.

**V. Current Changes to the CalFresh Program**

CalFresh Expansion

Effective June 1, 2019, individuals receiving, or authorized to receive, Supplemental Security Income/Supplementary Payments (SSI/SSP) through the Social Security Administration are now potentially eligible for CalFresh or the Supplemental Nutrition Assistance Program (SNAP).

Projections from the State of California Department of Social Services (CDSS) identified 10,045 SSI/SSP residents of Contra Costa County to be CalFresh eligible. Of this population, we anticipate that approximately 6,500 of these individuals are currently receiving In Home Supportive Services (IHSS) through the Aging and Adult Services Bureau of the Employment and Human Services Department (EHSD).

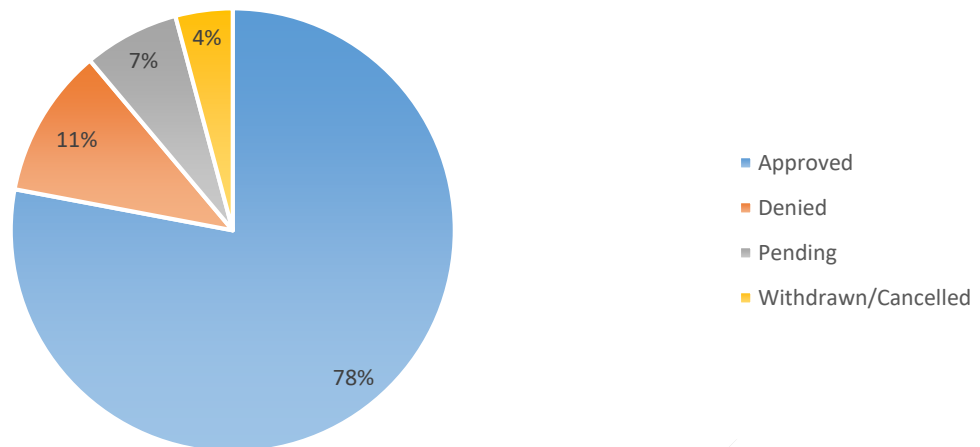
Leading up to implementation, EHSD was understaffed and lacked adequate resources to hire. The FY 18/19 State/Federal funding was provided in December 2018 in the amount of \$973,280 to cover planning and implementation costs. The CAO made up to \$300,000 (\$600,000 with Federal match) available to fill the gap until September when the FY 19/20 CalFresh/SSI allocations are known (still pending). The FY 19/20 State budget shows a very small statewide allocation of \$30 million for SSI Expansion, which is offset by a \$30 million reduction in the overall CalFresh allocation, leaving no estimated increase for CalFresh services. Employment and Human Services (EHSD) funded 24 positions (15 temporary Eligibility Workers-EW, 4 temporary clerical and 5 permanent EW's) to assist in this effort.

Under Federal law, the eligibility determination for CalFresh must be completed within 30 days of the application date. The initial influx of applications has been challenging and beyond our capacity to meet this requirement. Currently we have pulled staff, department wide, to process these applications and continue to focus on overtime to bring our application timelines into compliance.

**CalFresh SSI Expansion: Individuals**

<b>SSI Category</b>	
CalFresh SSI Expansion	3910
CalFresh SSI Expansion with IHSS	1422
<b>TOTAL</b>	<b>5332</b>

### Expansion Application Status



#### Next Steps

EHSD has a long history of working with the SSI population and we are familiar with the vulnerabilities and special physical and mental challenges with which many struggle. To that end, and with the aim of providing a supportive case management environment, EHSD will be combining the caseloads of SSI recipients into a separate eligibility division under one manager. These program caseloads include General Assistance, the SSI Advocacy program, IHSS Medi-Cal (not IHSS program cases handled by social workers), CalFresh eligibility cases, and non IHSS CalFresh cases. Workers in this division will have assigned cases and will be the primary case management point of contact for their recipients. This division has been established and we are solidifying our dual program workers to ensure holistic services for this population. Management is currently refining the business process and procedures and are in the final stages of hiring. The Aging and Adult Services Bureau will conduct targeted outreach to their IHSS/SSI recipients, in an attempt to bring those eligible into the CalFresh program and increase participation.

#### Able-Bodied Adults Without Dependents-ABAWD

The Personal Responsibility and Work Opportunity Reconciliation ACT (PRWORA) of 1996 limited the receipt of CalFresh benefits to three (3) full months in a 36-month period for Able Bodied Adults without Dependents (ABAWDs).

California has been under a statewide waiver of the ABAWD time limit since 2008 due to the high statewide unemployment rate. Effective August 31, 2018, the statewide waiver expired for certain geographic areas within California (San Francisco, Santa Clara, and San Mateo counties) and those areas became ineligible for a waiver of the time limit. Counties that lost their waiver were required to implement ABAWD beginning September 1, 2018. Effective August 31, 2019 three additional geographic areas (Alameda, Contra Costa and Marin Counties) will become ineligible for a waiver of the time limit and will be required to implement ABAWD effective September 1, 2019.



An ABAWD is an able-bodied adult between 18 years and 49 years old who is not disabled, pregnant, or living in a household with minor children. For individuals in this category there are ways to be exempt from the rule and ways to meet the requirement. In both exempt and meeting the requirement situations, individuals will not be held to the three (3) month time limit.

Some of the more common exemptions are:

- Complying with CalWORKs Welfare to Work requirements
- Responsible for the care of an incapacitated person
- Applying for or receiving Unemployment Benefits
- Participating in a drug or alcohol treatment/rehabilitation program
- Attending high school, a training program or an institution of higher education at least half time

An individual will meet the ABAWD work requirement by:

- Working at least 20 hours per week (80 hours average per month)
- Participating at least 20 hours per week (80 hours average per month) in an allowable work activity (training program)
- Electing to perform community service or volunteer work at least 20 hours per week (or 80 hours averaged monthly)

Federal law provides that each state be allotted a number of individual exemptions equal to a percentage of the state's annual caseload that is subject to the ABAWD time limit. These exemptions allow counties to extend eligibility to ABAWDs who would otherwise be ineligible. Each exemption is equal to one month of eligibility for one individual and are referred to as percentage exemptions (previously known as the 15% and 12% exemptions).

The percentage exemption is only available to individuals at risk of losing federal benefits and the law allows discretion in how to utilize this exemption. CDSS has established statewide criteria regarding the allocation of the percentage exemption adopted by Contra Costa County including:

- Error protection for ABAWDs who were inadvertently issued benefits after exhausting their 3 months
- Individuals who are making an effort to work
- Special Circumstances, i.e., reentry, seasonal employment, Foster Care

California is operating on a "fixed statewide clock" meaning the 36-month period has the same beginning and ending date in all 58 counties for all ABAWD individuals. California's first 36-month period began January 1, 2017 and will end on December 31, 2019. A new 36-month "fixed statewide clock" will begin January 1, 2020.

Contra Costa County is electing to approve a percentage exemption for all individuals who have used their three (3) months for December 2019. This will allow a safety net while we continue screen ABAWDs for exemptions, finding employment or enrolling in a training program. With the new "fixed state clock" starting in January 2020, Contra Costa County – EHSD will not see anyone terminated, for ABAWD rules

until April 2020. Currently the Food Bank of Contra Costa and Solano County is employing an ABAWD navigator who is screening potential ABAWDs for exemptions.

In an effort to have available opportunities in Contra Costa County as our ABAWD waiver comes to an end, the Foundation of California Community Colleges (FCCC) in coordination with Contra Costa County is in the process of expanding CalFresh E&T also known as Fresh Success. It is anticipated by mid-fall we will be bringing two additional employment and training providers to Contra Costa County. This expansion will provide additional options for those who do not otherwise meet an exemption.

## **VI. Outreach, Access, and Community**

EHSD continues our efforts to increase CalFresh participation ensuring that more children, families and individuals are able to purchase nutritious food by working with our Community Partners. We continue to work with the Food Bank of Contra Costa and Solano to train nonprofit staff in CalFresh so they have a better understanding of the program and enrollment process. This enhanced training and knowledge will make a positive impact in the community and will assist us in strengthening our community partnerships.

Our partnering agencies continue to express a desire for the County to participate more robustly in outreach efforts. Grants and funding opportunities often request organizations to collaborate with the County, which we evaluate and assess, taking into account funding, resources and grant requirements. Funding for direct outreach efforts by the department is limited by a prohibition on using Federal funds.

Access to CalFresh through our Intake system has been at the forefront as a result of the influx of applications from SSI recipients. We are in the process of planning improvements that will facilitate access across our county and improve our processing time. The CDSS and CWDA are collaborating on proposals to streamline county processes and bring more consistency in our CalFresh application systems. Another important aspect of facilitating application access is expanding our reach in the community. We will be exploring options to increase sites in the county that provide application assistance for CalFresh.

Some of our recent highlights:

- The Food Bank of Contra Costa County and Solano has hired an ABAWD Navigator to screen for exemptions and provide resources. The Navigator is located in our Hercules office two days per week. Her primary goal is to contact individuals that may be impacted by the new ABAWD rules, explain the guidelines to the recipient, and submit an exemption if applicable. To date, our ABAWD Navigator has made contact with 1,430 individuals and assisted recipients with 115 exemption worksheets.
- The EHSD CalFresh Program Analyst conducts “Just the Basics” training with the Food Bank. This takes place three to four times per year with 25 to 30 participants from various community organizations. This training has been a foundation in developing new partners since 2006. Aides of the Board of Supervisors, staff from WIC, the Monument Crisis Center, La Clinica, Rubicon, Public Health, Head Start, One Stop Centers, and the Family Justice Centers attend these trainings.

The training provides an overview of the applications process, eligibility requirements and specific topics such as the upcoming ABAWD requirements.

- EHSD has developed a video that is available on EHSD.ORG that outlines the ABAWD requirements. This video was developed to assist our partners in identifying ABAWD exemptions and submitting these to the County. This video can be found on ehdsd.org.



- EHSD continues to provide client navigational services and direct access to benefits, including CalFresh, through our 4 Our Families Strategic Initiative. This service model provides a holistic approach to helping first time clients access the supports and services they need through EHSD and our Community Partners. Our 4 Our Families staff has been requested to assist with CalFresh Expansion; however, they still provide services at the Richmond Family Justice Center, Bay Point SIT Site, EHSD Antioch District Office and the EHSD satellite office in Brentwood.
- The CalFresh Program Analyst continues to participate in training for Contra Costa County Health Services Department, Health, Housing and Homeless, H3. This training is another avenue to educate the community and other service providers on CalFresh benefits, including how to apply, ABAWD, CF Expansion and basic eligibility.

## **VII. Legislation and Policy Items of Interest**

Under the current Administration, we continue to be concerned about potential legislative or allocation methodology changes, which may result in client eligibility and/or funding reductions to SNAP. We continue to track this issue through several mechanisms, including County representative organizations and our Policy and Planning Division. These changes will have an impact to our CalFresh participations and/or increase the workload of our staff.

- A proposed rule by the US Department of Agriculture will limit benefits to those earning less than 130% of the national poverty level or \$32,640 for a family of four and only allowing \$2,250 in assets. It is estimated that 3 million individuals will be impacted in California, and 4,000 households in Contra Costa County. This new regulation was introduced on July 22, 2019 and is currently in the 60-day comment period.
- Public Charge is a term used by the US Citizenship and Immigration Services (CIS) when referring to noncitizens that have or may become dependent on public cash assistance. The Trump Administration published a final rule regarding the definition, determination, and application of Public Charge on August 14, 2019. This rule will take effect on October 15, 2019. The Final Rule expands the types of benefits that may be considered for Public Charge, which impacts programs EHSD administers to low income individuals and families. Programs that may negatively affect immigration and newly considered Public Charge are Medi-Cal, CalFresh, and Section 8. Use of these benefits may be taken into account when decisions are made about entry into the country and adjustment of immigration status. Due to the complexity of the rules, EHSD and other partners are anticipating a general fear from our non-citizen population to apply for, or continue, benefits. Although difficult to quantify, we have had individuals contact the MCSC to terminate their benefits. EHSD has been preparing for possible changes to the Public Charge rules by working with our community partners and posting information and resources at [ehsd.org](http://ehsd.org).
- Because of the significant increase of disasters combined with record-breaking destruction, California created Assembly Bill AB 607, the community Resiliency and Disaster Preparedness Act of 2017. In accordance with AB 607, the Bay Area Social Services Consortium (BASSC) is developing a social services mutual aid plan. The plan is a work in progress and includes Alameda, Contra Costa, Marin, Monterey, Napa, San Benito, San Francisco, San Mateo, Santa Clara, Solano and Sonoma Counties. It is anticipated that the agreement will be officially incorporated into the Department and CDSS disaster plan for FFY 2021.
- The telephonic signature is a type of electronic signature that uses an individual's recorded spoken signature or verbal consent in place of an actual written signature. The use of the telephonic signature, as part of the application or recertification process, will eliminate the need to mail documents in order to gather a client's ink signature. In addition, utilizing this process will also reduce the amount of cases that are discontinued for failure to complete the recertification process, which will assist with reducing churn. Currently this software is available at our Medi-Cal CalFresh Service Center (MCSC) and our Hercules office. EHSD is pushing the software out to all staff department-wide for immediate implementation along with Adobe sign, a secure document submission system.

#### CalFresh Employment and Training

- Contra Costa County's CalFresh Employment and Training (CFET or CF E&T) is a voluntary program that launched in April 2017 in partnership with the Foundation of California Community Colleges (FCCC). Our CFET program design is that of an intermediary model, in which the FCCC serves as the entity between the State and its service providers, Rubicon and Opportunity Junction. The FCCCs, under the authority of the California Department of Social Services (CDSS), maintains responsibility for completion of the Statewide CalFresh E&T Plan, training, selection, and immediate oversight of the participating providers and administrative responsibility. Contra Costa County Employment and Human Services (EHSD) has a non-financial contract with both Rubicon and Opportunity Junction that describes our partnership, working relationship, and information sharing process.

Our CFET program offer participants a pathway to a better job through skills building and workforce preparatory services. CFET services address the urgent need for participants to build skills and receive job-driven training. The increasing need for a skilled workforce is an opportunity to move CalFresh (CF) recipients into new and better paying jobs. This has led EHSD to collaborate with community-based organizations to expand E & T services in Contra Costa County.

- Elderly and/or Disabled Household Demonstration Projects

Standard Medical Deduction

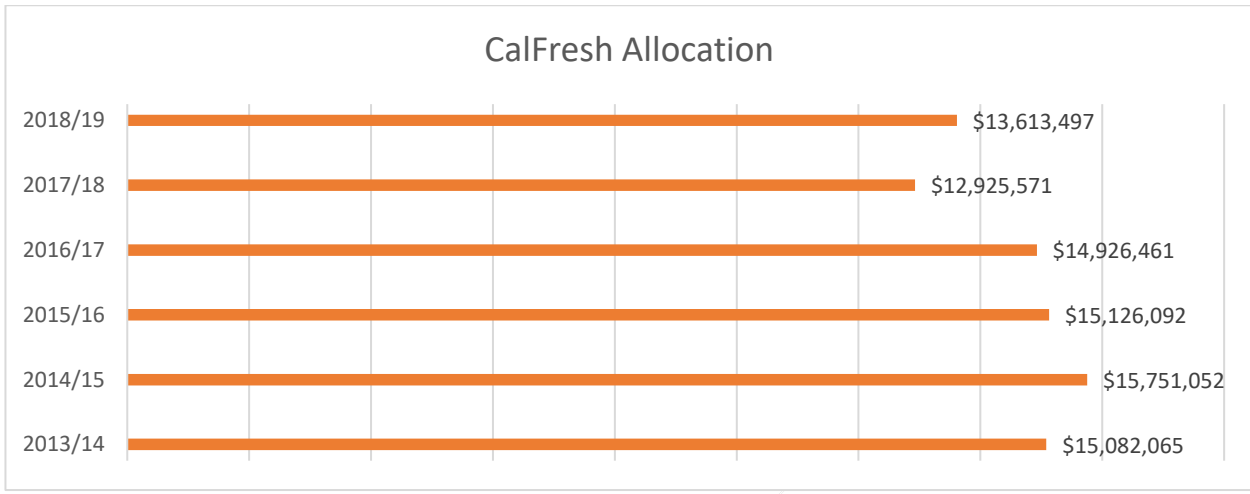
Effective October 1, 2017 through September 30, 2021, a standard medical deduction of \$120 will be issued for households in which an elderly or disabled member incurs medical expenses in excess of \$35 per month. Households with an elderly or disabled member include those with at least one individual who is 60 years of age or older and/or disabled and/or receives a disability based benefit. To be eligible, the household must verify that they incur more than \$35 a month in qualifying medical expenses. Households with more than \$155 a month may opt out to document and claim actual expenses. Since the implementation of this new policy, there are currently 2,745 households utilizing this deduction. EHSD has sent mailers to households and posted notifications in its lobbies outlining this deduction in the hopes of increasing these numbers. This deduction is especially important for our SSI/SSP individuals, this deduction can help maximize their benefit amount.

Elderly Simplified Application

Effective October 1, 2017 through September 30, 2021, a simplified application process has been approved in an attempt to improve CalFresh access among the state's low-income elderly and disabled population. The project waives the recertification interview requirement, uses existing data matches to reduce verification requests, and extends the certification period to 36 months. The project applies to households where all members are either elderly (age 60 or older) and/or disabled with no earned income. The project does not apply to other CalFresh participants. Since the implementation of this new policy, the 36-month certification has been approved for over 4,000 households.

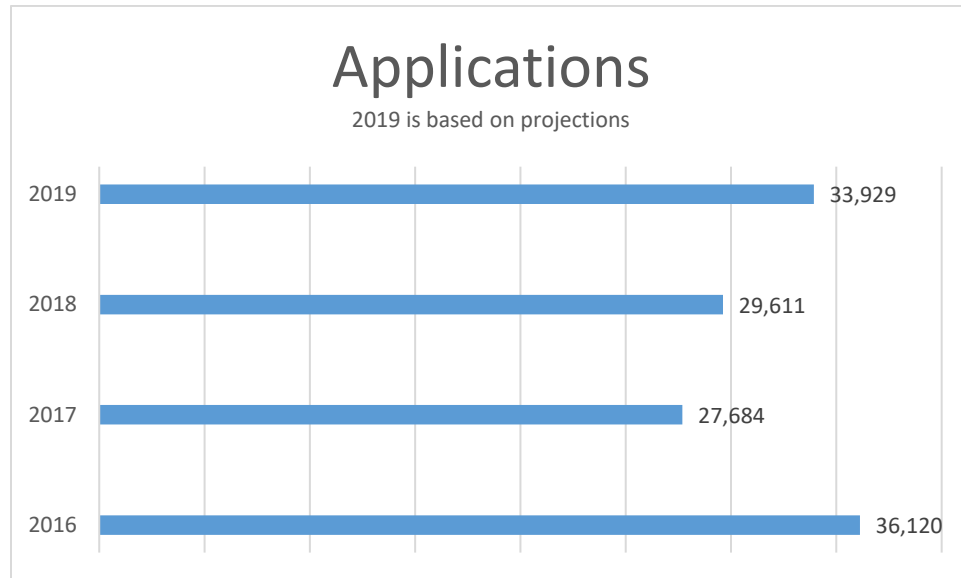
**X. Revenue and Allocations**

CalFresh Allocations of State and Federal funds continue to drop each fiscal year. The slight increase in FY18/19 was to accommodate for CalFresh Expansion. The allocation for FY 19/20 has yet to be received.



Recently discussions have begun at CDSS and the California Welfare Directors Association (CWDA) to review the administrative budgeting methodology. It has been determined that the worker rate is understated and counties are underfunded. This will be an ongoing project with a committee comprised of County representatives, CDSS, CWDA, Fiscal and Self Sufficiency committees.

EHSD has seen a significant increase to CalFresh applications so far this program year. Using monthly averages, the department anticipates receiving close to 34,000 applications in 2019. With the introduction of technology to simplify the application process, policy changes that expand eligibility, and outreach efforts, EHSD is anticipating increases to CalFresh participation.



#### **XI. Next Steps**

The Department remains committed to providing timely and ready access to CalFresh benefits for those with food insecurities. The streamlining of processes, use of technology and ongoing assessment of service improvement are all current priorities. Additionally, EHSD has a continual objective to improve in areas of outreach, access and enrollment.