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Master Plan for Aging Recommendations related to CalFresh, SNB & TNB

Issue Statement: Currently nearly 40% of older adults in California report facing hunger, with significantly higher levels among Latinx, Black and Asian older adults. Recent research concludes that hunger costs California \$7.2 billion annually in additional health care costs. We can support the dignity, health and independence of older adults, while achieving significant health system savings, by maximizing participation in CalFresh by older adults and fulfilling the vision of the Supplemental & Transitional Nutrition Benefit programs to hold harmless those who lost some or all of their CalFresh food assistance as a result of the historic SSI Expansion.

MPA Framework Goal: Achieving any of the Plan's Goals are impossible without dramatically improving food security among older adults. The below recommendations apply most closely to Master Plan for Aging Framework goal #4: Economic Security and Safety: We will have economic security and be safe from abuse, neglect, and exploitation throughout our lives.

MPA Framework Objective: This recommendation applies to the following framework objectives:

- Objective 4.1: Californians will be economically secure throughout our life span with access to housing, food, and income as we age.

Recommendations: 1) commit to enroll all eligible older adults and people with disabilities in CalFresh, maximizing the benefits for which they are eligible. The Master Plan should fulfill the SSI Expansion by [meeting existing CalFresh enrollment targets](#)¹ and evaluating progress and re-assessing those targets to enroll all newly eligible SSI recipients into CalFresh. Many of these efforts will help enroll eligible non-SSI older adults. 2) Ensure that the Supplemental & Transitional Nutrition Benefits truly hold harmless SSI consumers.

Target Population and Numbers: Despite the incredible gains in enrolling non-SSI older adults over the past several years, non-SSI older adults CalFresh is severely underutilized, ranking last

¹ Potential Additional SSI Only CalFresh Households. <https://www.cdss.ca.gov/Portals/9/CalFresh%20SSI%20Cash-Out/Potential%20Additional%20SSI-Only%20Households-Updated.pdf?ver=2019-05-17-164327-590>.

in the county and at less than half of the national average: 19% vs. 42%.² While the SSI Expansion has been extremely successful to date, enrolling some 300,000 older adults and people with disabilities, analyses suggest that the total CalFresh eligible SSI population is [about 800,000](#).³ Because the SSI Expansion rollout was staggered from June – December 2019, CDSS is still tracking the SNB & TNB populations. As of October 2019, there were 33,343 SNB households and 6,292 TNB households statewide.⁴

Detailed Recommendations:

- **Recommendation 1: Simplify and modernize CalFresh access for older adults and people with disabilities.**

California should advance the priority solutions identified by the [SSI Expansion Customer Experience Working Group](#) to be available in every county, such as enabling application and recertification over the phone (telephonic signature access), and providing flexible interview options in all counties. The inability to complete the entire application process remotely imposes a challenge for older adults who face mobility and transportation challenges. [End-to-end phone access](#), [flexible interviewing](#), and simplifying verifications for deductions such as [medical expenses](#), are long-standing program access priorities, and early data and client feedback from the Expansion confirm that these assist applicants to move through the application process swiftly, maximize benefit allotments, while providing administrative benefits for counties.

- **Recommendation 2: Leverage all opportunities within the Elderly Simplified Application Project.**

All eligible Californians, regardless of where they live, what language they speak, their life circumstances, or their functional limitations should be able to access CalFresh with ease.

California should maintain all existing elements of the ESAP,⁵ and adopt all those not currently utilized such as requesting federal authority to remove the annual interim report to minimize burdens on applicants and counties by certifying households for three years at a time. Furthermore, California should create a simplified application informed by user-centered design principles that would help overcome stigma and [minimize barriers to CalFresh applications known among older adults](#).

² Food Research & Action Center and AARP Foundation. SNAP Maps: Overview of SNAP Average Monthly Participation Among Eligible Seniors. <https://www.frac.org/wp-content/uploads/senior-snap-map-analysis.pdf>.

³ Cunnynham. Reaching Those In Need: ESTIMATES OF STATE SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM PARTICIPATION RATES IN 2016. <https://fns-prod.azureedge.net/sites/default/files/resource-files/Reaching2016.pdf>.

⁴ CDSS CalFresh Data Dashboard: Expanding CalFresh to SSI Recipients. <https://public.tableau.com/profile/california.department.of.social.services#!/vizhome/CFdashboard-PUBLIC/Home?publish=yes>

⁵ <https://www.cdss.ca.gov/Portals/9/ACL/2017/17-34.pdf?ver=2017-04-26-131831-990>
<https://www.cdss.ca.gov/Portals/9/ACL/2019/19-44.pdf?ver=2019-05-09-121357-660>

- Recommendation 3: Improve program access by addressing language inequities.**
 Limited English Proficiency is specifically cited as a reason for low enrollment among California’s older adults.⁶ The Plan should ensure CalFresh provides robust, real-life translation and language resources, to ensure CalFresh application and recertification are supported in all threshold languages spoken by older adults and people with disabilities. According to the Lost in Translation report from the UC Berkeley Goldman School of Public Policy, addressing language inequities is at the heart of improving CalFresh participation: “The English participation rate is quite high at 93%, which would compare favorably to the national average (for all languages) of 86%. However, given that statewide participation is 72.2%, there is considerable evidence that the low overall participation rate is being driven by low enrollment rates in LEP populations. If enrollment rates for all languages were equivalent to the English rate, then an estimated 1.037 million additional individuals would be enrolled and participating in CalFresh.”⁷
- Recommendation 4: Expand existing outreach and leverage new partnerships to enhance enrollment.**
 Outreach and application assistance is an essential part of enrolling older adults in CalFresh, who often have questions and benefit from experienced staff to complete the application and interview. Expanding state funding for existing outreach providers enables in-depth, in-person trainings and other opportunities to share best practices and develop new strategies to increase enrollment. California should also leverage the new partnerships between the Department of Social Services with the Departments of Aging, Developmental Services and Rehabilitation established through the SSI Expansion. These partnerships should continue their successful engagement in CalFresh outreach, and expand to incorporate broader collaboration of food access and other services across the agencies that serve the same older adults and people with disabilities. The Plan should also sustain effective efforts pioneered in the Expansion, such as IHSS social workers providing CalFresh application assistance, to encourage similar cross-program coordination.
- Recommendation 5: Improve CalFresh benefit adequacy to fight hunger, improve health and boost enrollment.**
 Benefit allotments for the program are determined based on an outdated federal funding model and do not account for the true cost of living in California. A wealth of research has documented the value of CalFresh benefits, and their inadequacy to last

⁶ National Council on Aging. Senior SNAP Participation Visualization. <https://www.ncoa.org/economic-security/benefits/visualizations/senior-snap-participation/>.

⁷ Moon. Lost in Translation: Language access solutions to increasing uptake of CDSS programs. 2019. <http://transformcalfresh.org/wp-content/uploads/2019/09/Lost-in-Translation-Language-access-solutions-Joony-Moon.pdf>.

the month.⁸ Benefits inadequacy is often frequently cited by older adults as justification to not enroll in CalFresh, including during the SSI Expansion.⁹ California should increase benefits by raising the minimum benefit allotment, providing farmers' market coupons and other initiatives to ensure adequate benefits.

- **Recommendation 6: Extend CalFresh entitlement to aid and protections against churn to SNB and TNB.**

California deserves great credit as the only state in the nation to provide state funded food assistance to hold harmless the households who lost CalFresh benefits as a result of ending the SSI cash-out policy, through the Supplemental & Transitional Nutrition Benefits initiated as part of the historic CalFresh Expansion to SSI consumers. As put into statute¹⁰, however, the SNB and TNB programs are overly narrow and do not provide adequate protections for clients to retain the benefits or return to aid given existing barriers of administrative churn in both the CalFresh and SSI programs. TNB households, for example, are permanently barred from the program if they [miss a 30-day window to compete their recertification that will soon recur every 6 months](#). We know from CalFresh and SSI, unfortunately, that clients lose benefits or program access due to administrative churn frequently, but in this case there is no provision to re-apply.

In addition, early indications suggest larger than expected populations experiencing benefit loss and becoming eligible for the SNB & TNB programs, heightening the urgency of ensuring these programs achieve their purpose to truly hold harmless these families. The state took a vital step to ensuring program security last year by making the funding permanent. California must now prevent households from losing benefits for life due to administrative barriers, and should provide the same entitlement status and program protections as exist in CalFresh, which these benefits have replaced.

- **Recommendation 7: Replace SNB and TNB during disasters.**

Just as CalFresh provides protections against losing benefits to administrative barriers, it also allows for [replacement benefits](#) following individual household misfortunes, or widespread disasters. Unfortunately, the need for replacement benefits was simply unforeseen in the development of these programs, and yet the Public Safety Power Shutoff & fire crises of Fall 2019 made clear that this mistake is not theoretical but

⁸ Food Research & Action Center. 2019. Initiatives to Make SNAP Benefits More Adequate Significantly Improve Food Security, Nutrition, and Health. <http://www.frac.org/wp-content/uploads/snap-initiatives-to-make-snap-benefits-more-adequate.pdf>.

⁹ See, for example, feedback from the River City Food Bank in the Sept/Oct All Stakeholder meeting.

<https://www.cdss.ca.gov/Portals/9/CalFresh%20SSI%20Cash-Out/Sept-Oct%202019%20CF%20Expansion%20SSI%20Implementation%20Update-FINAL.pdf?ver=2019-11-19-112845-167>

¹⁰ WIC Chapter 10, Sections 18900.5-.7.

http://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=WIC&division=9.&title=&part=6.&chapter=10.&article=

already harming SNB & TNB recipients who are losing their food. It is important for equitable treatment of older adults and people with disabilities that California provide replacement benefits to ensure parity with CalFresh only households and so that these benefits continue to aid households as the lost CalFresh benefits would have done, but for the SSI Expansion.

- **Recommendation 8: Ensure SNB and TNB benefit adequacy.**

Because the initial tables of benefits for SNB & TNB were based on projections of caseload and household circumstances, California must adjust Supplemental & Transitional Nutrition Benefits to account for actual household losses to the greatest extent possible, and continue to analyze and adjust benefits to ensure ongoing adequacy.

Evidence that supports the recommendations:

1. Today some 40% of older Californians live below the Elder Economic Security Index – a measure of basic living costs of housing, food, health care, and transportation specific to the needs of older adults. Similar proportions of older adults report facing food insecurity. According to the national food bank network Feeding America, 63% of older adult households served by the food banks are forced to choose between food and medical care, and households served by food banks that include an adult aged 50 or older are at an increased risk of having someone with a chronic health condition, including diabetes (41%) and high blood pressure (70%) — conditions that can be mitigated by healthy food options.
 - a. Sources:
 - i. <http://healthpolicy.ucla.edu/programs/health-disparities/elder-health/Pages/eidd.aspx>
 - ii. <http://healthpolicy.ucla.edu/chis/Pages/default.aspx>
 - iii. <https://www.feedingamerica.org/hunger-in-america/senior-hunger-facts>
2. Furthermore, these top-line figures mask inequities, as 66% of impoverished older Californians are women, and economic insecurity is significantly higher among Latinx, Black and Asian communities. Hunger is also rising in California’s rural & remote communities, home to disproportionate numbers of older adults, but often with the fewest resources, greatest food deserts, transportation barriers and other factors that drive hunger.
 - a. Sources:
 - i. <https://cahealthadvocates.org/women-aging-poverty-a-disturbing-reality/>
 - ii. <http://healthpolicy.ucla.edu/programs/health-disparities/elder-health/Pages/eidd.aspx>
 - iii. <https://www.npr.org/sections/thesalt/2017/10/03/555056477/one-mans-quest-to-feed-a-hungry-isolated-california-county>

- iv. <https://www.centerforhealthjournalism.org/2019/03/14/california-s-far-north-vast-food-desert-makes-hungry-kids>
 - v. <https://www.sacbee.com/news/california/article87505177.html>
 3. The lack of access to consistent, healthy food brings significant health consequences, especially in later life. By contrast, new data demonstrates the incredible current health care costs related to food insecurity and potential savings. Hunger costs California \$7.2 billion annually in additional health care costs, or \$2,033 per food-insecure adult. Reducing hunger by just 1%, however, would save the state approximately \$600 million annually.
 - a. Sources:
 - i. <https://californiahealthline.org/news/food-insecurity-senior-hunger-california/>
 - ii. https://www.cdc.gov/pcd/issues/2019/18_0549.htm
 - iii. <https://public.tableau.com/profile/feeding.america.research#!/vizhome/TheHealthcareCostsofFoodInsecurity/HealthcareCosts>
 4. CalFresh is a lifeline, with older adult households receiving roughly \$137 a month for food. The Master Plan comes at a key time, in the midst of the historic CalFresh Expansion to SSI consumers, with more than 300,000 older adults and people with disabilities enrolled since June 1st. CalFresh has been proven to make dramatic improvements on the health and wellness of low-income older adults, including: reducing the probability of food insecurity by 18 percent, reducing depression, and decreasing cost-related nonadherence medication SNAP by 4.8 percent (a 30 percent reduction). CalFresh provides truly life-saving access to food: astoundingly, CalFresh even reduces mortality among adults aged 40-64.
 - a. Sources:
 - i. http://www.frac.org/wp-content/uploads/senior_facts_CA.pdf
 - ii. Rabbitt, M. P. (2013). Measuring the Effect of Supplemental Nutrition Assistance Program Participation on Food Insecurity Using a Behavioral Rasch Selection Model. University of North Carolina at Greensboro, Department of Economics Working Paper Series. Greensboro, NC: University of North Carolina at Greensboro.
 - iii. Kim, K., & Frongillo, E. A. (2007). Participation in food assistance programs modifies the relation of food insecurity with weight and depression in elders. *Journal of Nutrition*, 137, 1005–1010.
 - iv. Srinivasan, M., & Pooler, J. A. (2018). Cost-related medication nonadherence for older adults participating in SNAP, 2013–2015. *American Journal of Public Health*, 108(2), 224–230.
 - v. <https://www.healthaffairs.org/doi/10.1377/hlthaff.2019.00405>
 5. Connecting older adults to food assistance through CalFresh achieves tremendous social and economic gains: annually saving more than two thousand dollars in

healthcare expenditures and lowering the likelihood of admission to a hospital (-14%) or nursing home (-23%), as well as reducing hospitalization rates and the cost of hospital stays.

- a. Sources:
 - i. <https://www.bdtrust.org/wp-content/uploads/2017/08/Policy-Brief-FINAL.pdf>
 - ii. <https://www.bdtrust.org/wp-content/uploads/2017/08/Policy-Brief-FINAL.pdf>
6. [End-to-end phone access](#), [flexible interviewing](#), and simplifying verifications for deductions such as [medical expenses](#), are long-standing program access priorities, and early data and client feedback from the SSI CalFresh Expansion confirm that these assist applicants to move through the application process swiftly, maximize benefit allotments, while providing administrative benefits for counties.
 - a. Sources:
 - i. <http://transformcalfresh.org/wp-content/uploads/2016/05/Telephonic-Signature-in-California-Counties-Survey-Results-2016-1.pdf>
 - ii. <http://transformcalfresh.org/wp-content/uploads/2019/01/Flexible-Interview-Scheduling-2018-ATC-FINAL.pdf>
7. Language access is a primary barrier to CalFresh enrollment. According to the Lost in Translation report from the UC Berkeley Goldman School of Public Policy, addressing language inequities is at the heart of improving CalFresh participation: “The English participation rate is quite high at 93%, which would compare favorably to the national average (for all languages) of 86%. However, given that statewide participation is 72.2%, there is considerable evidence that the low overall participation rate is being driven by low enrollment rates in LEP populations. If enrollment rates for all languages were equivalent to the English rate, then an estimated 1.037 million additional individuals would be enrolled and participating in CalFresh.”¹¹
 - a. Sources:
 - i. <http://transformcalfresh.org/wp-content/uploads/2019/09/Lost-in-Translation-Language-access-solutions-Joony-Moon.pdf>.
8. SNB & TNB benefits are vital, but at risk. California deserves great credit as the only state in the nation to provide state funded food assistance to hold harmless the households who lost CalFresh benefits as a result of ending the SSI cash-out policy, through the Supplemental & Transitional Nutrition Benefits initiated as part of the

¹¹ Moon. Lost in Translation: Language access solutions to increasing uptake of CDSS programs. 2019.

historic CalFresh Expansion to SSI consumers. As put into statute¹², however, the SNB and TNB programs are overly narrow and do not provide adequate protections for clients to retain the benefits or return to aid given existing barriers of administrative churn in both the CalFresh and SSI programs. TNB households, for example, are permanently barred from the program if they [miss a 30-day window to compete their recertification that will soon recur every 6 months](#). We know from CalFresh and SSI, unfortunately, that clients lose benefits or program access due to administrative churn frequently, but in this case there is no provision to re-apply.

The households who receive these programs are some of the poorest Californians, who long suffered under the cash-out policy. Their households include very low-income older adults and/or people with disabilities or blindness preventing them from work, and these benefits provide vital food assistance that should be available for as long as the household remains eligible. In addition, early indications suggest larger than expected populations experiencing benefit loss and becoming eligible for the SNB & TNB programs, heightening the urgency of ensuring these programs achieve their purpose to truly hold harmless these families. The state took a vital step to ensuring program security last year by making the funding permanent, but the work is unfinished.

Examples of local, state or national initiatives that can be used as an example of a best practice:

- [The Framework of Solutions for Customer Experience and Access: Resource Toolkit 3.0](#) developed by CDSS includes numerous examples of strategies and business process improvements that counties have implemented.
- [The Alliance to Transform CalFresh](#) similarly has published reports and guides about strategies to increase participation in CalFresh and improve the enrollment experience for Californians.

Implementation: Addressing the hunger crisis for our older adults will require the Governor and his administration to work with the Legislature and other stakeholders to come up with solutions:

- First and foremost, we must improve the CalFresh enrollment rate & enhance the protections provided by the SNB & TNB programs for older adults in California by implementing the above Recommendations 1-8.
- Next, lawmakers and regulators must utilize data and cross-departmental partnerships to ensure continuous improvement.

Person-Centered Metrics: Success will be measured by:

- Increase in the number of older adults enrolled in CalFresh

¹² WIC Chapter 10, Sections 18900.5-.7.

http://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=WIC&division=9.&title=&part=6.&chapter=10.&article=

- Decrease in the number of older adults experiencing hunger
- Decrease in the healthcare costs of older adults associated with hunger

Potential Costs/Savings:

- Reducing hunger by just 1% would save the state approximately \$600 million annually.
- CalFresh benefits are 100% federally funded, making it an incredibly cost-effective solution to hunger.
- Every dollar in CalFresh benefits provides between \$1.50-\$1.80 in local economic activity. Every \$1 billion in benefits supports more than 13,000 jobs.