



CalFresh Eligibility in Contra Costa County

**SUPPORTING INDIVIDUALS IDENTIFIED AS
ABLE BODIED ADULTS WITHOUT DEPENDENTS**

October 22, 2018



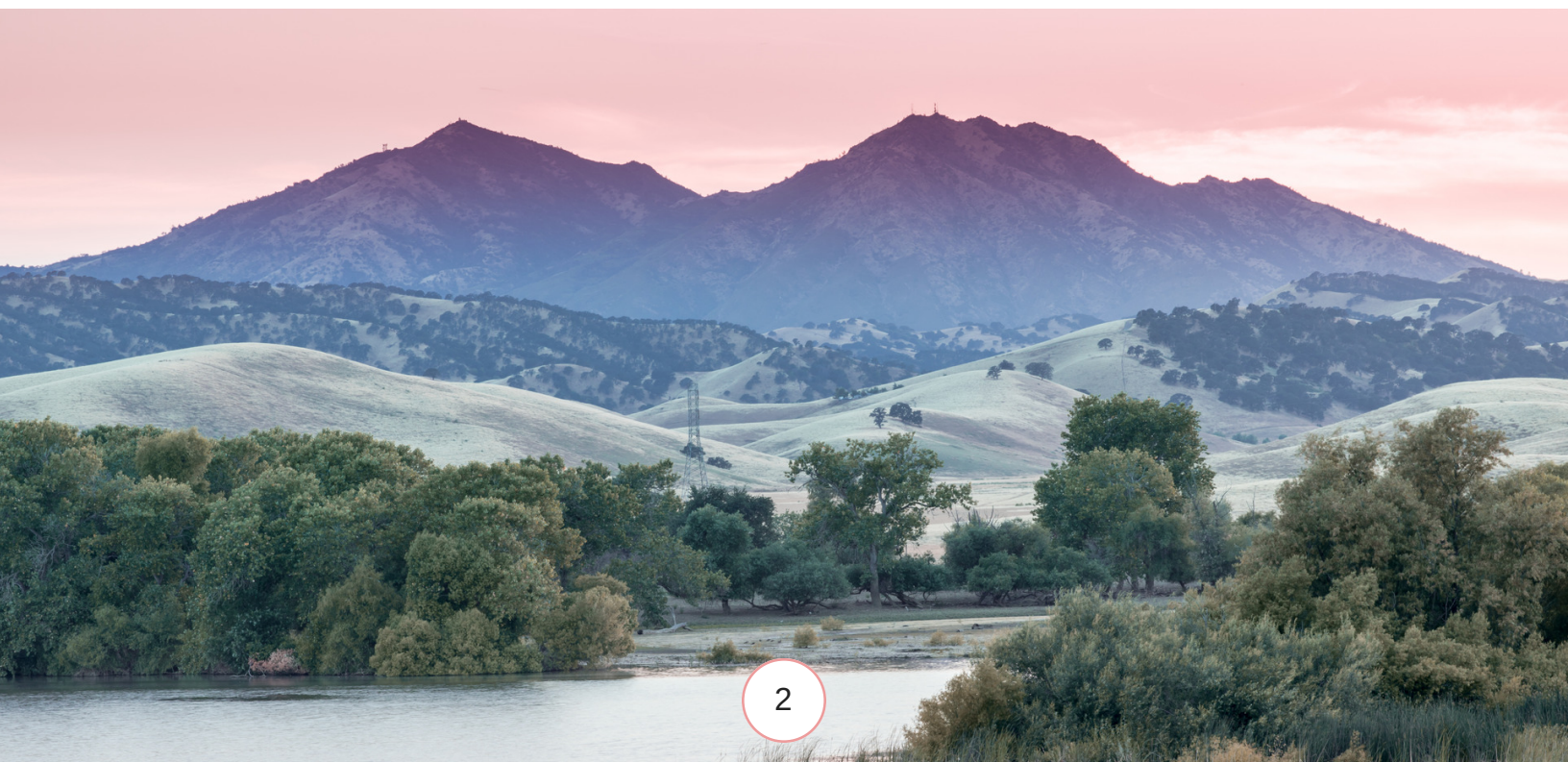
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Context

Significant changes are on the horizon for CalFresh participants (the federal Supplemental Nutritional Assistance Program (SNAP) formerly known as Food Stamps), who are identified as **Able Bodied Adults without Dependents (ABAWDs) in California**. For nearly a decade since the Great Recession, these individuals with ABAWD status have had a waiver from federal work requirements that were established during welfare reform under the Clinton administration. As a result of declining unemployment rates, three counties (San Francisco, San Mateo and Santa Clara) lost their waivers of the work requirements for people deemed ABAWDs in September of 2018. Alameda, Contra Costa, and Marin counties are scheduled to lose their waivers in September of 2019. In addition, changes regarding who is subject to work requirements, such as an expansion in the age range for participants, and a reduction in the allowable ages for those considered dependents, were proposed in the House version of the 2018 Farm Bill, and it remains uncertain what will be included in the final reconciliation bill, and when it will be passed.

The Contra Costa County Employment and Human Services Department has estimated that roughly 4,000 individuals in the county are likely to lose their food assistance as a result of losing the waiver, creating substantial hardship for individuals and increasing pressure on food banks and other social service providers. Many of those subject to the work requirement are highly vulnerable, and experience multiple barriers to employment, including: health and mental health issues, substance abuse, unstable housing/homelessness, lack of work experience or skills, caring for a dependent family member, disability, unavailability of the work hours needed to meet the minimum requirement of 80 hours per month, and a shortage of employment training and work experience opportunities to prepare for paid employment.



In anticipation of these challenges, and in recognition of the need for thoughtful planning to ensure both continued access to food aid and a pathway to economic mobility, a group of East Bay funders, including the Walter S. Johnson, Kaiser Permanente, Dean and Margaret Leshner, Thomas J. Long, and Y&H Soda foundations, came together in the winter of 2017 to provide support for a local planning process in Contra Costa County. Facilitated by the Glen Price Group (GPG), the goal of the planning process was to understand the impacts of the loss of the waiver, and how best to address these. A Core Planning Team (CPT) comprised of key stakeholders was established and met monthly from March through July of 2018. During this period a Discovery Report was produced based on research and interviews with key stakeholders, and a set of draft Shared Impact Strategies was developed. Work Groups have been formed that will continue to refine and develop the Shared Impact Strategies so that they can serve as a guide for timely action among public, private and non-profit entities.



State and Federal Policy

The federal Farm Bill, which lays out federal policies for the Supplemental Nutrition Assistance Program (SNAP), is being reauthorized following the expiration of the current bill on September 30, 2018. The House and Senate passed significantly different versions of the bill earlier in the summer, and the reconciliation process will continue until a common version of the bill can be agreed upon. The Senate version is a more bipartisan bill and does not include elements such as expanding the age range (changing the upper age limit from 49 to 59) for those subject to work requirements.



SNAP (known as CalFresh in California) is a federally mandated, state-supervised, and county-operated government entitlement program that provides monthly food benefits to assist low-income households in purchasing the food they need to maintain adequate nutrition levels. In 2017, an average of 4.1 million individuals in California and 63,000 individuals in Contra Costa County received CalFresh benefits each month.

People identified as **Able-Bodied Adults Without Dependents (ABAWDs)** can receive SNAP benefits for up to 3 months within a 36-month period unless the individual is working and/or participating in an employment and training program 80 hours per month or more, or participating in workfare or volunteer opportunities. All California counties had a waiver for this requirement through August 2018, based on their high rates of unemployment in comparison to the national rate. This waiver was lifted for San Francisco, San Mateo, and Santa Clara Counties on September 1, 2018. Alameda, Contra Costa, and Marin counties are scheduled to lose their waivers on September 1, 2019.

Federal SNAP funding is available for the provision of employment and training services in two primary ways: 1) SNAP E&T grant ("100 percent funds"), and 2) 50 percent reimbursement funds. The former provides a relatively small amount of funding (\$11.3 million total in FFY2017); the latter can expand to meet needs if programs fulfill the matching funds requirement (match must be non-federal and not already in use to match federal funds, with few exceptions).

CalFresh in Contra Costa County

CalFresh E&T (Employment and Training) is a federally supported program that enables persons deemed ABAWDs to retain their CalFresh eligibility while receiving training and supported employment, with the goal of achieving economic mobility.

The expiration of the ABAWD work requirement waiver on September 1, 2019 in Contra Costa County means that the County needs to begin planning and implementing efforts now to prepare to address the potential loss of CalFresh benefits for an estimated **3,900-4,600 individuals** deemed ABAWDs in the county.



Contra Costa County administers CalFresh E&T through the Fresh Success program. Fresh Success participants can access educational programs and training as well as career technical/vocational training and education. Participants also receive career counseling, interview training, resume development, job search, and other similar supports. **Opportunity Junction** and **Rubicon Programs** are the two service providers serving Fresh Success participants in Contra Costa County. The **Foundation for California Community Colleges** and the **Contra Costa County EHSD** administer the Fresh Success Program.

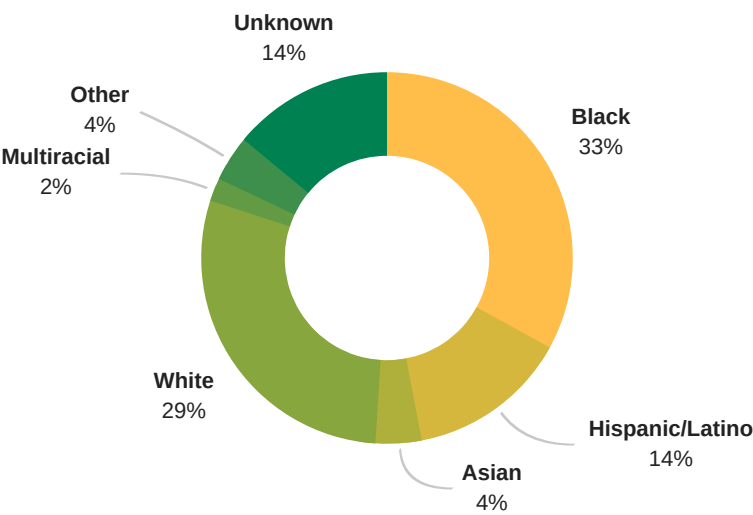
The three colleges of the Contra Costa Community College District will be launching the Fresh Success program in the coming year with start-up funding from the Thomas J. Long Foundation and Walter S. Johnson Foundation. The colleges will support CalFresh-eligible students in improving their employability through adult basic education and career technical education courses. Students will receive academic and career counseling and other supportive services, as well as financial support for textbooks, transportation, and other items necessary to successfully achieve their educational goals.



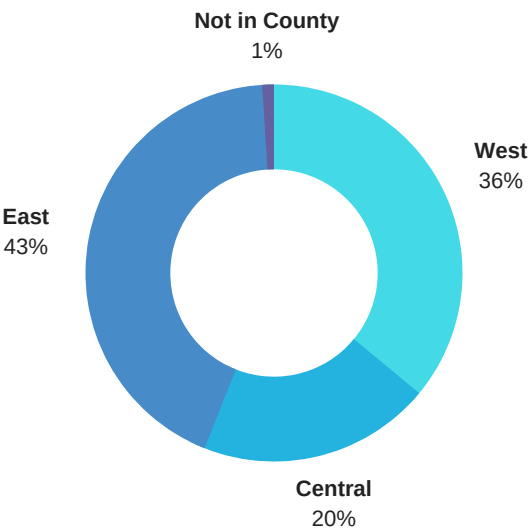
Serving ABAWDs in Contra Costa

Contra Costa County estimates there are 4,398 individuals classified as ABAWDs who are currently receiving CalFresh benefits; the majority are U.S. citizens who are male and speak English. More than two-thirds are between the ages of 21 and 40. There are more training providers but fewer people deemed ABAWDs in the central region of the county, and more individuals classified as ABAWDs but fewer training providers in the east and west regions of the county. Approximately 80% of current people deemed ABAWDs receiving CalFresh benefits are at risk of losing their benefits following the expiration of the work requirement waiver.

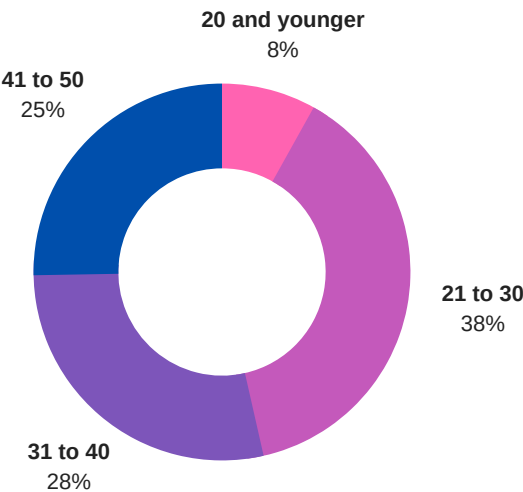
Race/Ethnicity



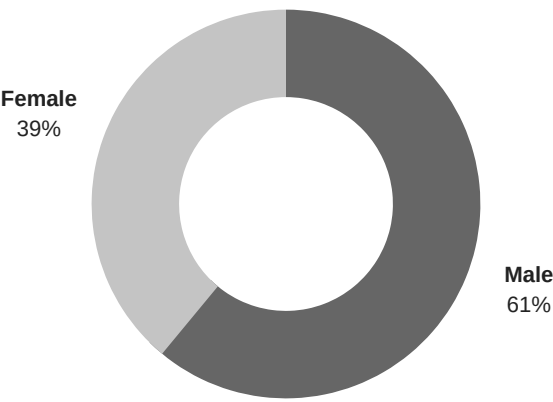
County Region



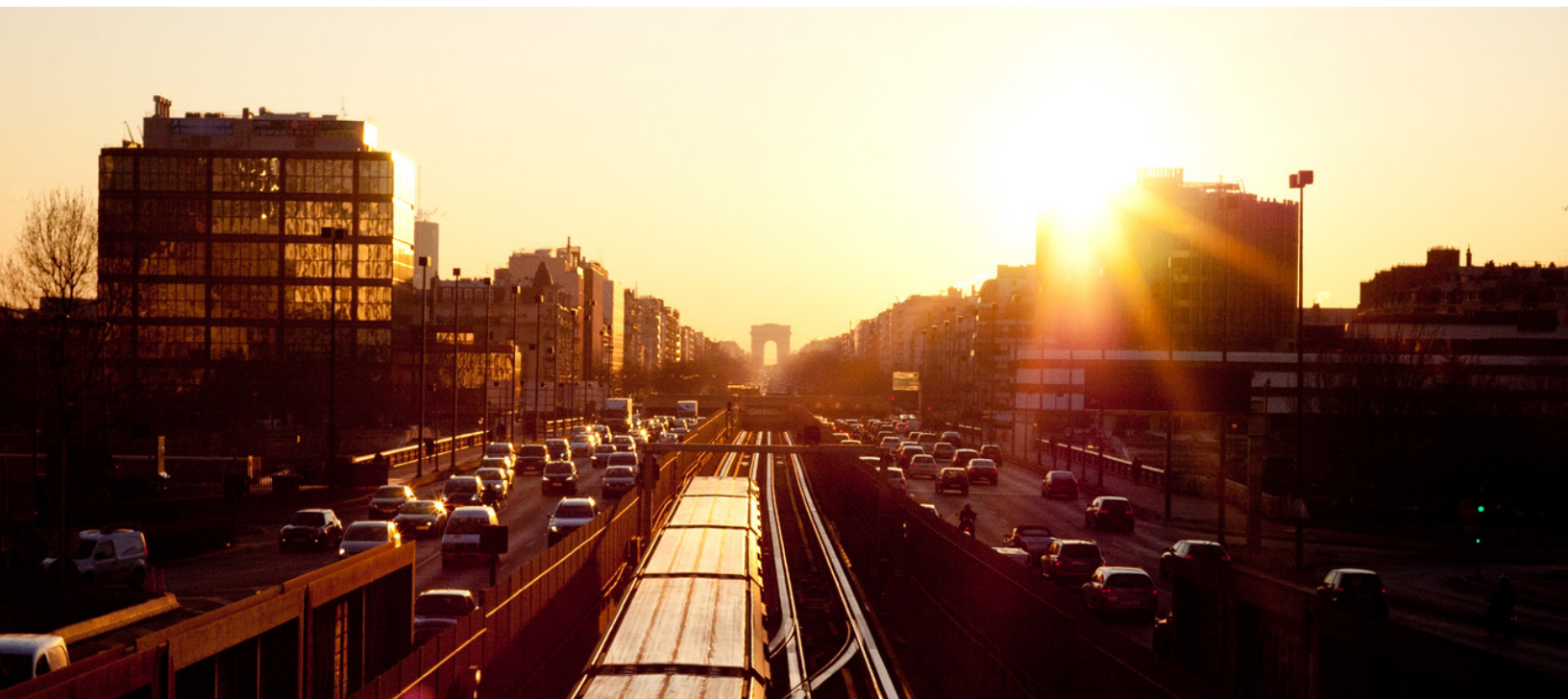
Age



Gender



In a survey of 112 individuals who enrolled in Opportunity Junction's 5-7 month full-time intensive training program for the administrative field: 98% indicated a lack of skills for an administrative job, 82% indicated past trauma, 29% indicated they were terminated from past employment, and 29% indicated a history as a victim of domestic violence. Transportation (e.g., lack of a driver's license or lack of access to a vehicle) and access to affordable childcare also surfaced as key challenges for program participants in securing and maintaining employment.



A number of employment sectors have been identified by the Contra Costa County Workforce Development Board as promising employment pathways for people deemed ABAWDs in the county: Healthcare, Transportation and Warehousing, and Construction. The Workforce Development Board also identified Information and Communication Technology, Advanced Manufacturing, and Life Sciences/Biotechnology as high-growth, high-wage sectors in the region.



Developing Data-Driven Strategies

The expiration of the ABAWD work requirement waiver (as well as any new or modified policies in the reauthorized Farm Bill) will go into effect between the three-month CalFresh certification periods for many individuals. Because Contra Costa County has been operating under a waiver, eligibility screenings have not included information to establish that an individual is subject to the ABAWD time limit and work requirement. The county will need to determine a plan for gathering and maintaining this information. The county will need to create new systems for identifying and classifying people as exempt. Individuals are exempted from ABAWD status (and corresponding requirements) for several reasons, including age, unfitness for work, or having a dependent child. Activities to maximize exemptions may include reviewing existing applications, interview protocols, and report forms to ensure they are collecting the necessary information to determine exemptions, ensuring county and partner organization staff clearly understand the exemption determination process, and starting to assess individuals who may be subject to the time limit to complete as many assessments as possible prior to the expiration of the waiver.

California can exempt 15 percent of people deemed ABAWDs from the time limit, and has discretion over how these exemptions are distributed. There is no guarantee that the state will allocate its 15 percent exemption proportionally to each County, so developing a clear plan for the use of exemptions will strengthen the case that the County would use its exemptions provided as part of the state's allocation well. The California Department of Social Services recommends that counties allocate their 15 percent exemptions to the following: error protection, those making an effort to work, people experiencing reentry, the seasonally employed, families in which the dependent child ages out, former foster youth, and family reunification.

Promising Program Models

Effective service models help SNAP recipients receive the most benefit from SNAP E&T-funded services, gain and retain employment, and achieve economic self-sufficiency. **Washington State's Basic Food Employment & Training (BFET) program** provides an example of a highly successful SNAP E&T program that Contra Costa County can look to as it develops and implements its shared impact strategies.

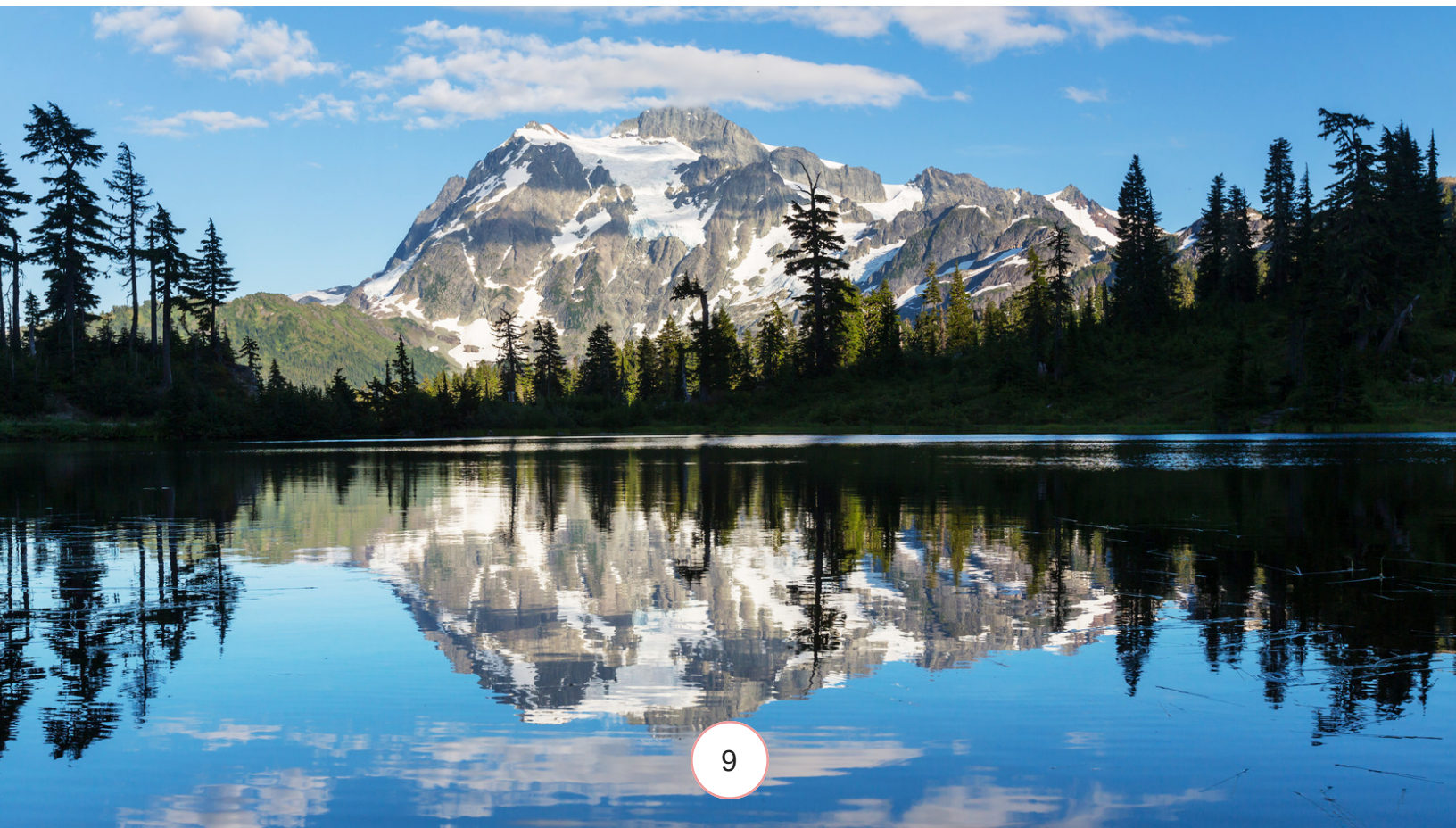
Jewish Vocational Services has convened a CalFresh E&T Learning Community, with members in Alameda, Contra Costa, and San Francisco counties, that can serve as a forum for discussing strategy ideas, successes, and challenges. One strategy that has emerged from these discussions is the establishment of a **Social Security Income (SSI) Trust** to increase the rate of conversions from General Assistance to SSI for elderly and disabled individuals, as a way of increasing the level of services they receive and exempting them from the ABAWD time limit.

Basic Food Employment & Training (BFET) Program

Launched in 2005, the BFET program has grown from a \$150,000 pilot to a budget of more than \$29 million, expanding from the city of Seattle to the entire state, and from one community college and a few CBOs to 34 of the state's colleges and more than 30 CBOs. The program is run through the state's Department of Social and Health Services (DSHS), and was started within DSHS Region 4 (which includes Seattle/King County).

Currently, community colleges and CBOs provide a wide array of employment and training services and supports. Participants may receive more than one type of service and may be co-enrolled, or receiving services from multiple organizations, which is encouraged by BFET since it has been shown to lead to the best outcomes for participants. The services provided include: job search services, job training, basic education, vocational education, job retention services, and additional support services such as child care, transportation, clothing, and housing.

Despite its current success, prior to the BFET program the SNAP E&T program and support for people deemed ABAWDs in Washington State were insufficient, and workforce development programs faced declining revenues. A number of factors enabled the BFET program to succeed, including a commitment among government agencies and community-based organizations to collaborate, leverage resources, and share data, and early philanthropic support to implement a pilot project.



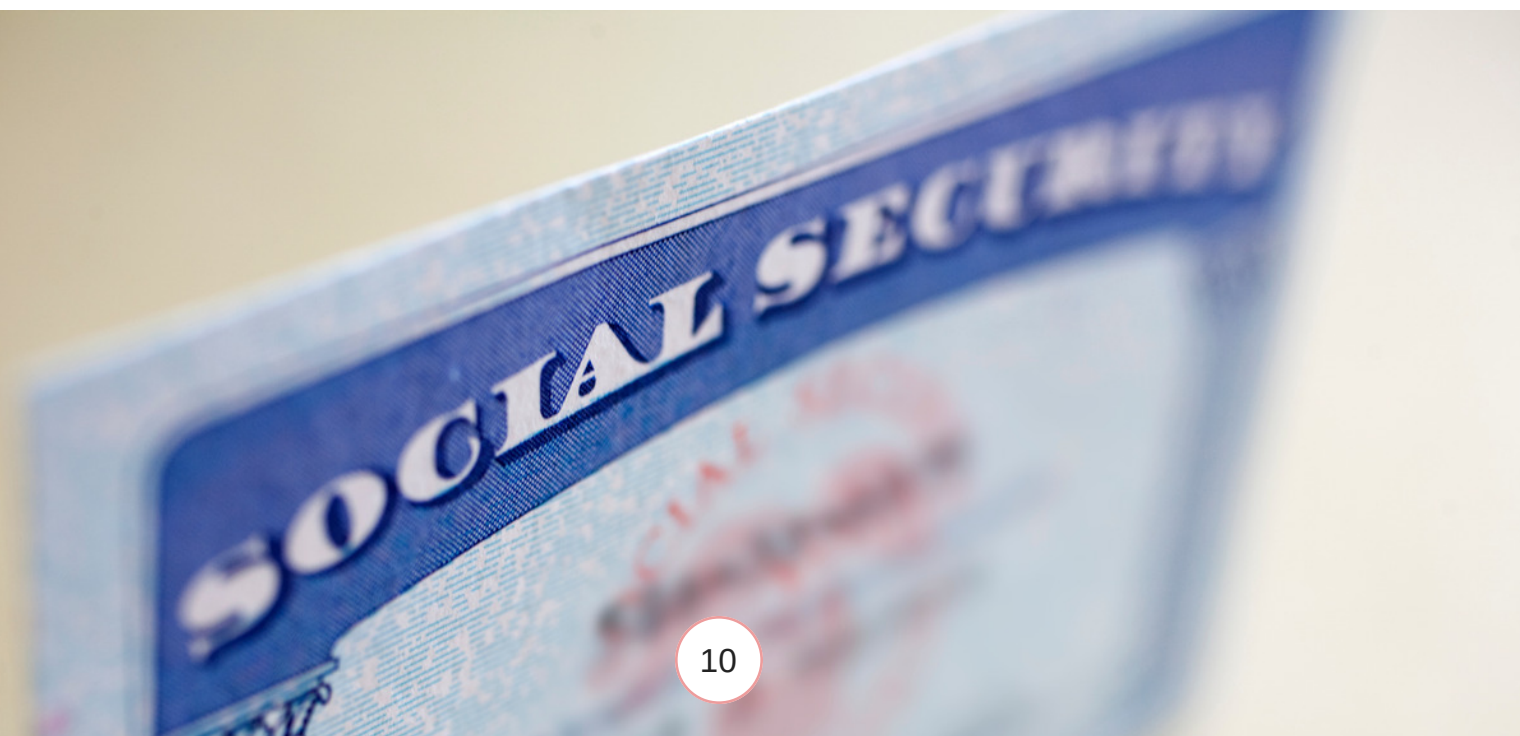
SSI Trust

The SSI Trust model has been in operation in Alameda County since 2012, and has subsequently been implemented in San Francisco and Los Angeles counties.

This approach is less directly focused on securing and maintaining eligibility for CalFresh, and more on increasing access to benefits for individuals who are unable to work due to a health condition, in order to help them stabilize their housing and reduce their need for other services. The key to this approach is to invest in expanded advocacy to increase the conversion rate for moving individuals from state- and county-funded GA (General Assistance) to federally and state-funded SSI (Supplemental Security Income) support. (The approval process for transitioning to SSI benefits is challenging, and requires an expansion of SSI legal support.) Enrollment in SSI automatically removes an individual from the pool of people subject to ABAWD time limits, reducing the harmful effects of the end of the waiver.

Because monthly SSI benefits are more than three times the amount of the average GA grant (\$910 per month vs. \$250 per month), those who transition to this type of support are more likely to obtain stable housing and thereby stabilize their lives and reduce access to crisis health and mental health services. Data from Alameda County shows that in the 12 months subsequent to receiving SSI benefits, roughly 80 percent of clients experienced fewer psychiatric emergencies and 80 percent experienced fewer hospitalizations.

An initial investment is required in order to launch the SSI Trust model and expand advocacy capacity, but the results are dramatic for both the impacted individuals and for county budgets. Results from the implementing counties include a reduction of 61 percent in the number of cases closed without securing SSI benefits in Alameda county, and a return on investment of from \$3.67 per dollar spent in Los Angeles County to \$5 for every dollar spent on legal advocacy in San Francisco county.



Shared Impact Strategies



The Shared Impact Strategies presented below were developed by the Core Planning Team (CPT) over a period of several months following completion of the Discovery Report and serve as a framework for continued planning by the county and its partners to flexibly address the changing legislative and policy environment around federal food aid time limits and work requirements. These strategies begin with maximizing the numbers of individuals who are able to receive exemptions from the work requirement. This includes carefully interviewing, screening, and educating of CalFresh participants to ensure that all individuals are receiving the exemptions they are entitled to. An additional strategy focuses on increasing the level of funding and services for individuals whose CalFresh benefits are threatened by expanding advocacy for GA recipients who are eligible for enrollment in SSI benefits. This (SSI Trust) model has proven to be highly successful in both improving quality of life for service recipients and reducing costs in other counties.

For those who remain subject to the work requirement, the goal is to enable as many individuals as possible who want to meet that requirement to do so. This may include expanding the number and capacity of providers who can offer CalFresh E&T or workfare services to individuals identified as ABAWDs on CalFresh to help them meet the work requirements. A strong communication system needs to be put in place to ensure that people deemed ABAWDs are aware of the challenges and opportunities in front of them, and for those classified as ABAWDs that fall through the cracks, the safety net needs to be bolstered to support their food security. Non-federal funding will need to be identified to support almost all of these strategies.

The following pages include information about the four high-level strategies developed by the CPT. Three Work Groups will be formed to work on refining and implementing the strategies. One group will address strategies 1 (Screening, Exemptions and Referrals), and 3 (Outreach, Communications and Education); a second will address strategy 2 (Employment, Training and Volunteer Opportunities), and a third group that will address strategy 4 (Establishment of a Contra Costa County SSI Trust). The work of the task groups will include identifying potential partners, necessary resources, timeline, outcomes, impact, and feasibility for each of the strategies.

1

Screening, Exemptions, Referrals

1.1

Partner with Contra Costa County Health Services to develop or leverage and standardize existing screening tools/checklists specific to the County to ensure all possible exemptions are assessed and ongoing follow up is conducted. Consider having people apply for SSI as an automatic exemption.

1.2

Ensure standardized screening tool/checklist is widely distributed and broadly understood, including to CalFresh application “assister” organizations (e.g. Rubicon Programs, Opportunity Junction, Food Bank, Contra Costa Community College District) for reverse referrals.



1.3

Develop and provide training in the use of a specific tool for application assisters to screen for people who have timed off of CalFresh for any new exemptions that may have arisen (checklists/strategies for people in different situations).

1.4

Develop and implement pilot for “screening” to indicate potential classification of an individual as “unfit for work,” thereby exempting them from the work requirement.

1.5

Initiate interventions to prevent populations from entering ABAWD status. For example: CalWORKS / SSI Children: last child turning 18, or parent losing child; and for Foster Children, aging out of foster care, and young adults aged 18-21.

1.6

Establish a CalFresh ABAWD Navigator Position based at EHSD to help people navigate the system and understand ABAWD rules.

1.7

Develop and submit to the California Department of Social Services a plan for use of 15% exemption funds.

2

Employment, Training, Volunteer Opportunities



2.1

Determine approach for identifying new Fresh Success providers to begin implementing in Fall 2019:

- ➡ RFI process
- ➡ Leverage existing cooperative efforts like the Contra Costa Workforce Collaborative to build upon this or replicate this method (currently no match eligible funding)

2.2

Identify additional sources for match-eligible funding to expand existing and attract additional Fresh Success providers.

2.3

Develop workfare as an option for participants--engage additional public/nonprofit partner organizations where people can carry out eligible activities (requires as few as 12 hours/month for non-E&T workfare).

2.4

Develop comprehensive list of E&T opportunities, combined with developing and supporting community partners to refer individuals who aren't exempt to E&T programs.

2.5

Explore opportunities for expanding CalWORKs subsidized employment and training program to CalFresh recipients. Seek further guidance on serving non-custodial CalWORKs parents (who are deemed ABAWDs) with CalWORKs Welfare-to-Work (W2W).

3

Outreach, Communications, Education

3.1

Develop webpage(s) that will house screening/ assessment tools and collateral material that can be shared with partners and/or participants: 1) Official documents, calendar of “what’s new” posts that correspond with the ABAWD roll-off timeline; and 2) Outreach/community education materials.

3.2

Develop workshops/trainings for CBOs and health care professionals (including drug treatment centers) focused on raising awareness and educating them about the rule, screening, and conducting outreach to people deemed ABAWDs with potential exemptions and/or who may be candidates for Fresh Success. Include/integrate medical exemption form. (Need two components: 1) Digestible information for organizations to share with clients; 2) Internal system information regarding implementation).



3.3

Provide outreach through workshops/ trainings / community meetings focused on individuals classified as ABAWDs who have potential exemptions and/or who may be candidates for Fresh Success including specific populations such as: reentry, homeless, foster youth, college students, etc. Could include:

- ➡ Resource fairs
- ➡ Financial workshops that help participants access public benefits to help achieve their overall financial goals

3.4

Implement intentional intervention to address concerns of individuals who may be subject to the ABAWD rule when information starts coming out about other counties that have lost their waivers through:

- ➡ Texting
- ➡ Mailing

3.5

Pending the outcomes of strategy 2.3, consider developing workshop/training for public/nonprofit organizations focused on workfare or volunteer opportunities and how they may develop and support workfare programs.

4

Supplemental Security Income (SSI) Trust



4.1

Collaborate with Contra Costa County (CCC) Employment and Human Services Department to analyze quantitative and qualitative data on current internal SSI advocacy efforts.

4.2

Work with Contra Costa County Board of Supervisors to develop support for a CCC SSI Trust Planning Committee with quarterly reporting to the existing Family and Human Services Committee.

4.3

Engage with Contra Costa Health Services and other health care providers to develop support for CCC SSI Trust as a partnered approach to the early intervention and case management of high users of medical and social services.

4.4

Analyze County health and social service data and successful implementation models in other counties to estimate potential cost savings for Contra Costa County.

4.5

Conduct assessment interviews with safety net recipients, service providers, and private SSI attorneys to identify gaps, challenges, and systemic barriers to accessing SSI.

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