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May 15, 2020

Food and Nutrition Service  
Office of Employment and Training  
1320 Braddock Place  
Alexandria, VA 22314

RE: Proposed Rule: Employment and Training Opportunities in the Supplemental Nutrition Assistance Program RIN 0584-AE68

To Whom It May Concern:

On behalf of California Food Policy Advocates (CFPA), we appreciate the opportunity to comment in support of USDA's Proposed SNAP employment and training rule which implements provisions of the 2018 farm bill that modestly improves state SNAP Employment and Training (E&T) programs in several ways. In sharp contrast to other recent proposed changes to SNAP rules from this Administration, this proposed rule may help some participants find and keep jobs while addressing some of the problems that E&T programs face in engaging and supporting participants.

California Food Policy Advocates (CFPA) is a statewide policy and advocacy organization dedicated to improving the health and well-being of low-income Californians by increasing their access to nutritious, affordable food. For over twenty-five years, we have advocated improvements in the operation of federal nutrition programs, including CalFresh, the state's largest food assistance program, known federally as the Supplemental Nutrition Assistance Program (SNAP). Our organization pays very close attention to SNAP because the program plays a critical role in addressing food insecurity and poverty in California,<sup>1</sup> and is the first line of defense against hunger for the majority of our low-income residents.

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<sup>1</sup> Public Policy Institute of California, "*Improving California Children's Participation in Nutrition Programs*", available at <https://www.ppic.org/publication/improving-california-childrens-participation-in-nutrition-programs/#fn-2>



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The SNAP Employment and Training program is an important means by which CalFresh participants who are subject to the harsh three-month time limit can stay connected to vital food assistance. Across California, 4.7 million adults and 2.0 million children live in low-income households affected by food insecurity.<sup>2</sup> Food insecurity means having limited, uncertain, or inconsistent access to the quality and quantity of food that is necessary to live a healthy life. Having sustained access to enough food is tied to positive social, physical, and mental health outcomes. SNAP/CalFresh plays a critical role in addressing hunger and food insecurity in our community. It is the first line of defense against hunger for 3.9 million low-income Californians and 36 million Americans.<sup>3</sup>

SNAP E&T programs can help low-income individuals who often face barriers to work, access education, training and other supportive services that are often difficult to obtain. In California, CalFresh E&T is focused around a central vision to increase the employment and earning capacity of CalFresh recipients by maximizing their access to CalFresh E&T, supportive services, skills, and credentialing.<sup>4</sup> CalFresh Work Registrants are not required to participate in mandatory CalFresh E&T or other employment opportunities as a condition of CalFresh eligibility. In FFY 2020, 37 of California's 58 counties operated a voluntary E & T program. Collectively, those 37 counties serve the majority of our state's CalFresh caseload.

One exceptional California E&T program, the Fresno Bridge Academy, was selected in 2015 by USDA as one of ten nationwide pilots to help inform national public policy on how to lift SNAP beneficiaries out of poverty. By the end of 2017, the program had expanded to 14 academies in five counties and the program was renamed The California Bridge Academies.

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<sup>2</sup> CFPA Factsheet, "Struggling to Make Ends Meet: Food Insecurity in CA," available at <https://cfpa.net/GeneralNutrition/CFPAPublications/FoodInsecurity-Factsheet-2019.pdf>

<sup>3</sup> USDA Food and Nutrition Service SNAP Data Tables, available at <https://www.fns.usda.gov/pd/supplemental-nutrition-assistance-program-snap>

<sup>4</sup> California Department of Social Service, CalFresh Branch, CalFresh Employment and Training, <https://www.cdss.ca.gov/inforesources/calfresh/employment-and-training>



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CFPA supports the proposed changes that make several improvements for individuals participating in E&T, including:

- Improving the work registration process by requiring states to inform individuals of their work-related requirements (7 CFR 273.7(c)(1))
- Clarifying that “good cause” applies when there is not an appropriate work activity for a mandatory E&T participant, thus ensuring – if implemented correctly – that individuals not lose SNAP due to the lack of an opportunity to comply with E&T (7 CFR 273.7(c)(11)(iii)).
- Clarifying that a state agency must determine whether an individual who failed to meet the 20 hour work or training requirement (or failed to complete workfare) had “good cause” and, if so, must be considered to have fulfilled the requirement (7 CFR 273.24(b)(2)). This helps ensure that individuals are not terminated from SNAP when they are unable to meet the work requirement through no fault of their own.
- Implementing a 2018 Farm Bill provision to require a state to reassess and, if appropriate, re-refer an individual when an E&T provider determines the individual is ill-suited for the program (7 CFR 273.7(c)(18)).

Though California does not make E&T participation mandatory, the actions above reflect the need to provide adequate opportunity for SNAP work registrants to show “good cause” so they are not cut off from vital food assistance.

We also support the proposed changes that can improve state agency operation of E&T. This includes provisions that:

- Replace “job search” with “supervised job search” which must be offered in state-approved locations with supervision. This may have a significant impact on many state programs that have relied on unsupervised or self-initiated job search as a primary activity. The proposed rule does not include a lot of detail about what “supervised” means, so states would have some discretion to comply.



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- Require the state E&T program to provide case management services (such as intake assessments, individualized plans, monitoring and coordination of services) to all E&T participants. It also requires a case manager to inform the agency of any individual who should be exempt from mandatory E&T or for whom the manager can't identify an appropriate E&T activity.
- Add apprenticeships and subsidized employment as allowable activities as well as activities from the E&T pilots that have the most demonstrable impact on finding and retaining employment.

The proposed rule includes other provisions in the Farm Bill. It requires the state agency to consult with the state workforce development board, adds workforce partnerships as a way SNAP participants can meet work requirements (but can't be required to), and adjusts funding for E&T. It also implements the reduction in discretionary exemptions from the three-month time limit for Able-Bodied Adults Without Dependents (ABAWDs) from 15 percent to 12 percent, as required under the Farm Bill.

The proposed changes above will make E&T programs work better for participants and meet the program's goals of fostering employment opportunities while ensuring people stay connected to food assistance. CFPA supports these changes, which provides some modest program improvements and may help some participants find and keep jobs while addressing some of the problems that E&T programs face in engaging and supporting participants.

Thank you for your consideration. If you have any questions, we can be reached at the contact information provided below and in our online comments submitted at [www.regulations.gov](http://www.regulations.gov).

Sincerely,

A handwritten signature in black ink that reads "Jared Call". The signature is written in a cursive, flowing style.

Jared Call



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