



June 5, 2020

By email

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California Department of Social Services

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744 P Street
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Re: ABAWD WAIVER

Dear Ms. Johnson:

We are writing to thank the California Department of Social Services (DSS) and CalFresh Bureau for requesting a statewide waiver of the Supplemental Nutrition Assistance Program (SNAP) Able Body Adult Without Dependent (ABAWD) time limit, as allowed under federal law and required under state law. We ask that you keep us apprised about the status of this request.

The National Bureau of Labor reports that California's unemployment rate hit [15.5% in April](#). Governor Newsom has predicted that our state's [unemployment rate could reach a peak of 24.5%](#) due to the economic fallout from the COVID-19 crisis, and to date, nearly 5 million Californians have filed for unemployment claims. What's more, the entire state has been approved for Unemployment Insurance Extended Benefits (EB). We must take every available precaution to ensure that low-income Californians are not improperly subject to ABAWD time limits.

As you know, California law established in 2017 by SB 89 ([WIC 18926](#)) states that *“to the extent permitted by federal law, the department shall annually seek a federal waiver of the existing federal Supplemental Nutrition Assistance Program limitation that stipulates that an able-bodied adult without dependents (ABAWD) participant is limited to three months of CalFresh benefits in a three-year period unless that participant has met the work participation requirement or is otherwise exempt.”* This waiver must be submitted for all counties eligible.

We realize that the [Families First Coronavirus Response Act \(H.R. 6201\)](#) passed on March 18th temporarily suspends the time limit for ABAWDs nationally until the emergency declaration has been lifted. However, we believe it is necessary for the Department to apply for a statewide waiver, not only because California law requires it, but because the emergency declaration could be lifted at any time, putting low-income Californians in danger of losing critical food benefits while the unemployment rate is still at staggeringly high levels across our entire state. We were pleased to see your waiver request this week.

We thank you for your leadership in preventing and protecting against hunger during these unprecedented times. We are grateful for the many steps the Department has taken to ensure access to critical food resources through CalFresh, Pandemic EBT, Cash Assistance, and other programs. We look forward to continuing to work together to prevent hunger in California while our communities are suffering due to the COVID-19 crisis and as we rebuild our economy afterward.

Sincerely,

Andrew Cheyne, California Association of Food Banks
Kevin Aslanian, Coalition of California Welfare Rights Organizations (CCWRO)
Jocelyn Larkin, Impact Fund
Jessica Bartholow, Western Center on Law and Poverty
Jared Call, California Food Policy Advocates
Alexandra Boskovich, Alameda County Community Food Bank
Cassidie Bates, Food Bank of Contra Costa and Solano
Itzul Gutierrez, Redwood Empire Food Bank
John Millsbaugh, Hunger Advocacy Network
Anahid Brakke, San Diego Hunger Coalition