



# Pushed out by paperwork: Why eligible Californians leave CalFresh

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The Supplemental Nutrition Assistance Program, commonly known as food stamps (or CalFresh in California), is a critical part of the nation's safety net. Though SNAP provides important assistance to families during periods of economic insecurity, not all eligible households participate. Several high-profile efforts have tried to enroll more eligible California households, but the state's take-up rate remains one of the lowest in the country.

One reason enrollment may be low is because eligible households leave the program too early. In this brief, we present evidence that paperwork burdens are causing otherwise eligible households to drop out of CalFresh, an especially troubling finding given California's current economic situation.

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## USING ENROLLMENT DATA FROM THE LAST 15 YEARS, WE FIND THAT:

- Exits from CalFresh spike in months when paperwork is required.
  - Households remain in CalFresh longer when they do not have to verify eligibility as frequently.
  - An estimated 500,000 income-eligible households leave CalFresh each year.
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In order to increase retention and improve program take-up, policymakers should minimize the burden that these paperwork requirements impose on program enrollees. This could take the form of making paperwork easier to complete and submit or reducing how often households are required to jump through these bureaucratic hoops.

## CONTEXT

In 2019, CalFresh assisted 5.6 million individuals across two million households, roughly 14% of the state’s population. Enrollment increased to its highest level on record in spring 2020 amidst the COVID-19 crisis.

In order to remain enrolled, CalFresh enrollees must periodically verify their eligibility. Most CalFresh recipients must do this twice per year.<sup>1</sup> The first required check-in occurs six months after enrolling. Participants must submit a two-page form summarizing any changes to their household’s income or composition since their enrollment or last recertification.

Twelve months after initial enrollment, and every year thereafter, most recipients must complete a full recertification. Recertification resembles the initial enrollment process in its length and complexity. In addition to completing a four-page form, households must also complete an interview in-person or over the phone with county staff. Households may need to submit proof of reported income as well. According to one study, these recertifications can take households about two hours to complete.<sup>2</sup>

Even if nothing about their circumstances has changed, households must still turn in both forms when they’re due.

Importantly for our purposes, most households need to complete one of these reporting requirements every six months, but prior to October 2013, these reports were due every three months. This reform allows us to see how less frequent reporting requirements affect program retention.

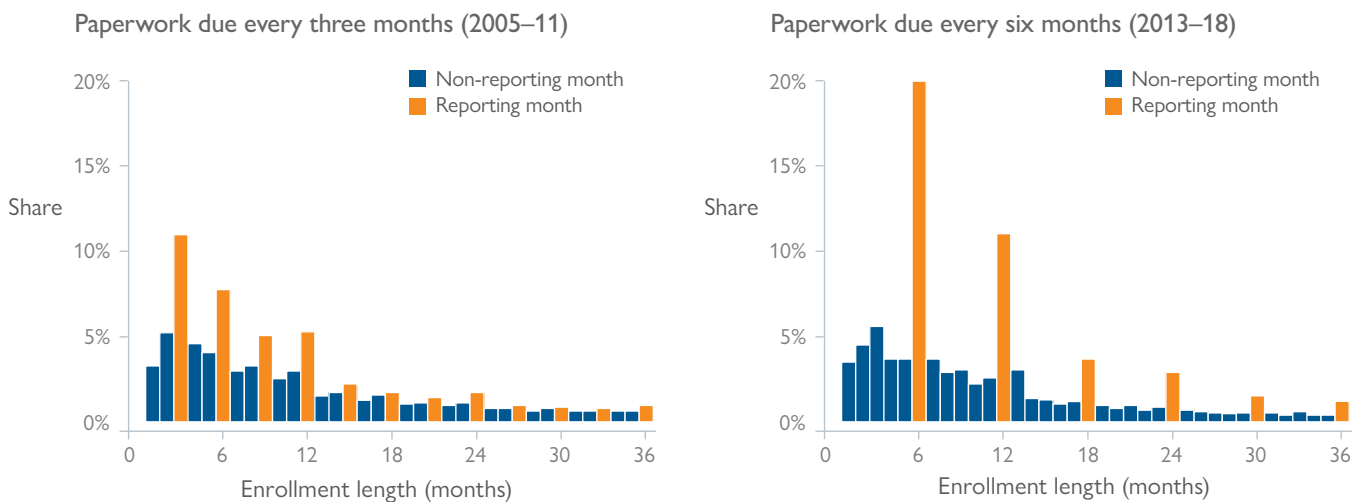
In this brief, we study the impact of these paperwork requirements on CalFresh enrollment, using individual enrollment records between January 2005 and June 2020. Since we can observe when every individual enters and leaves the program, we can identify how long they were enrolled, and how long they remain away from the program before they re-enroll, if they ever do. We also observe adult participants’ wage earnings during periods they’re enrolled, as well as six quarters before enrolling and after leaving the program.

### Finding 1: Households leave CalFresh when asked for paperwork

CalFresh exits spike in months when households must submit paperwork verifying their eligibility. [Figure 1](#) summarizes the lengths of time that households stay continuously enrolled in CalFresh. The left-hand panel shows enrollments that started

before October 2011, when households were required to submit paperwork every three months. The right-hand panel shows enrollments that started after October 2013, when the paperwork interval was increased to six months.

FIGURE 1: CalFresh enrollment lengths



Note. Cases initiated between November 2011 and September 2013 are omitted from the analysis to create a clear contrast between the pre- and post-policy periods. Orange bars indicate the months in which most households are required to submit paperwork that verifies their eligibility.

Source. CalFresh enrollment data analysis (2005–18).

There are two primary takeaways from these figures. **First, participants are six times more likely to leave in months when paperwork is required.** Since 2014, almost 20% of recipients leave CalFresh during the first month they are required to submit paperwork.

**Second, widening the time between paperwork requirements lengthened CalFresh enrollment periods.** Before 2013, the most common enrollment period was only three months long, the point at which households

first had to submit paperwork. After 2013, the share of households leaving the program at three months dropped, and the most common participation period increased to six months.

## Finding 2: Most households who exit CalFresh are still eligible

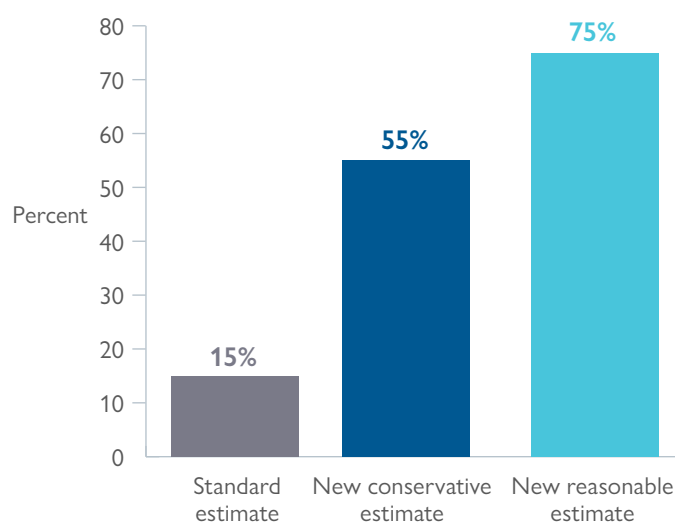
Do exits coincide with paperwork months because these processes screen out no-longer-eligible households, or is it because these processes are overly burdensome and deter both eligible and ineligible households from participating? To answer this question, we identify each household's earned income in the months before and after they exit the program and compare those amounts to the CalFresh income-eligibility threshold for their household size.<sup>3</sup>

Our findings are alarming. Even under a conservative definition of eligibility, in which we assume all the quarterly earnings we observe occurred in the month households leave, **we find that the majority of households (55%) that leave CalFresh over a five-year period (2014–19) appeared income eligible in the month they left.** Using a less conservative but still reasonable definition, in which we assume that quarterly earnings are evenly spread across the three months of the quarter in which the household exits, we estimate that 75% of households were eligible. These rates are nearly the same if we use earnings from the months following a household's exit, as opposed to earnings from the months before they leave, meaning that these high eligibility rates are not due to households leaving in anticipation of becoming ineligible due to a new job or increase in household income.

**Importantly, these estimates of the share of cases who leave CalFresh despite appearing eligible are three to five times higher than the measure used by the state's Department of Social Services to track the effects of paperwork requirements.** That measure, called the "churn rate," is the number of households who re-enroll in CalFresh within 90 days after exiting the program in a recertification month. While a valuable measure,

this churn rate potentially understates the share of eligible households who are exiting because it does not include households who return after 90 days, or those who never return. **Figure 2** shows the 90-day churn rate compared to our measures that take advantage of the linked wage records.

FIGURE 2: Share of cases that leave CalFresh but appear income-eligible using alternative definitions, 2014–19



Notes. The current standard estimate is the 90-day churn rate — the share of cases leaving in a recertification month that re-enroll within 90 days. The new measures identify the share of all cases who leave despite appearing income eligible using wage records. The conservative measure assigns all quarterly income to the month that the case exits. The more reasonable estimate divides income equally among all three months in the quarter.

Source. CalFresh enrollment data analysis (2014–19).

## CONCLUSION AND RECOMMENDATIONS

Our findings show that households are especially likely to leave the CalFresh program when they have to submit paperwork verifying their eligibility. Undoubtedly, some type of periodic verification is necessary, but we show that these paperwork burdens have the unfortunate effect of likely pushing hundreds of thousands of participants out of the program every year. Amidst a global pandemic and a severe economic downturn, this fact is especially concerning. While more Californians are likely to need food assistance, the stressors of the pandemic make already complicated processes even more difficult to navigate, reducing the likelihood that those who need help the most can apply and remain enrolled in CalFresh.

In the short term, federal policymakers should approve states' waiver requests to suspend many of these requirements during the ongoing health crisis. However, some states like California may not be in a position to take advantage of such waivers, because implementing them can be technologically challenging. Short-term postponements might also be confusing for some enrollees.

In the longer term, policymakers should consider the following strategies to ease the burden of reporting requirements.

### **Federal policymakers could:**

- Minimize the paperwork participants must complete, information they need to provide, and the number of interactions they must have with county staff to remain enrolled.
- Lengthen windows between eligibility verifications.

### **State policymakers could:**

- Continue to work with counties to make the interface that all CalFresh recipients use to complete and submit these eligibility certifications more user-friendly.
- Regularly survey counties about what practices they're using to help households complete this paperwork and evaluate which are best at improving retention.

### **Counties could:**

- Send additional phone and electronic messages (instead of only postal mail) to remind recipients about reporting deadlines and to communicate with recipients about incomplete, late, or missing paperwork.
- Allow more flexibility for recipients to schedule interviews when it's most convenient for them.
- Wherever possible, use available administrative data sources to confirm eligibility instead of asking recipients to provide proof themselves.
- Experiment with practices to reduce paperwork burdens.

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### Endnotes

- 1 For simplicity's sake, we use "paperwork" to refer to all reporting and recertification requirements, including the recertification review. Reporting and recertification requirements vary by household composition. The process described above applies to all cases with working-age enrollees, which comprised about three-quarters of the caseload in 2019. Households with only seniors or individuals with disabilities (comprising 12% of cases) are only required to complete the full recertification every 24 months, but they must submit the two-page SAR-7 form every 12 months if anything about their status has changed. If these households have no earned income, they only need to recertify every 36 months, but must still submit a SAR-7 once every year.
- 2 Julia Isaacs, *The costs of benefit delivery in the food stamp program* (U.S. Department of Agriculture, March 2008).
- 3 Determining SNAP eligibility is complicated. Generally, households are eligible if their gross household income is below 130% of their household's federal poverty level (FPL) and net income (gross income minus various deductions for qualifying expenses) is below 100% FPL. Some households qualify under higher income tests, and others are categorically ineligible. We do not observe a number of household circumstances that could affect eligibility, like unearned, self-employment or informal income, housing and medical expenses, and household composition after someone leaves the program. We also observe earnings only on a quarterly basis, which complicates determining month-to-month changes in eligibility. We account for these concerns by testing households' eligibility before and after they exit using an array of different definitions. See our full methodology [here](#).