



CDSS

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STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES

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EDMUND G. BROWN JR.
GOVERNOR

October 30, 2015

ALL COUNTY LETTER NO. 15-90

TO: ALL COUNTY WELFARE DIRECTORS
ALL CALFRESH PROGRAM SPECIALISTS
ALL CONSORTIUM PROJECT MANAGERS
ALL QUALITY CONTROL PROGRAM COORDINATORS

SUBJECT: ELIMINATION OF CHANGE REPORTING IN CALFRESH

REFERENCE: Senate Bill (SB) 79 (Chapter 20, Statutes of 2015), 7 CFR 273.12, 7 CFR 273.10(f)(3), [ACL 12-25](#), [ACL 12-25E](#), [ACL 15-42](#), [MPP 63-508.64](#), and [MPP 40-181.23](#)

The purpose of this All County Letter (ACL) is to provide County Welfare Departments (CWDs) with instructions for the elimination of Change Reporting (CR) for CalFresh.

BACKGROUND

SB 79 (Chapter 20, Statutes of 2015) requires the California Department of Social Services (CDSS) to no longer impose CR on certain CalFresh households. It is the intent of the legislature that all CR households be converted to Semi-Annual Reporting (SAR) households no later than January 1, 2017. CDSS, CWDs, and Statewide Automated Welfare System (SAWS) Consortia have decided to implement this policy change no later than July 1, 2016. CalWIN has chosen to implement effective June 1, 2016. LEADER and C-IV will implement effective July 1, 2016.

Under Quarterly Reporting Prospective Budgeting (QR, California's reporting system prior to SAR), United States Department of Agriculture, Food and Nutrition Service (FNS) regulations excluded migrant and seasonal farmworker households, homeless households, and households in which all adults are elderly/disabled from reporting quarterly and required these households to be assigned to CR. CR requires households to report changes to certain eligibility factors (e.g., employment, income, residency, etc.) within 10 days of the change. During the transition from QR to SAR, CR status was maintained for these households.

REASON FOR THIS TRANSMITTAL

- State Law Change
- Federal Law or Regulation Change
- Court Order
- Clarification Requested by One or More Counties
- Initiated by CDSS

Federal rules at 7 CFR 273.12(a)(5) allows states the option to assign all households to SAR. As a result of SB 79, California will be exercising the option to eliminate CR, resulting in administrative simplification for CWDs and simplified reporting requirements for households previously designated as CR.

CASELOAD CONVERSION

Prior to implementation, each CWD will be required to take steps to convert CR households to SAR. These steps include, but are not limited to:

- Training eligibility staff
- Providing client training about SAR
- Providing clients with informing notices prior to implementation

CWDs will be required to mail the CF 500 informational notice explaining the new reporting requirements and the transition to SAR to all affected CalFresh households six and three months prior to implementation. The CF 500 will be translated into all required languages per MPP Section 21-115.2.

The attached charts illustrate the conversion months, due dates for initial SAR 7 and recertification months for the three SAWS Consortia.

MAXIMUM CERTIFICATION PERIOD

Federal regulations at 7 CFR 273.10(f)(3) state that the state agency should assign each household the longest certification period possible, consistent with its circumstances. CDSS strongly recommends providing the maximum allowable certification period for households converting from CR to SAR.

ELDERLY/DISABLED HOUSEHOLDS

Households in which all adult members are elderly or disabled will continue to be certified for a period of 24 months. Based on their source of income (earned or unearned), these households will be required to submit a SAR 7 at different intervals as described below.

With Earned Income

These households must submit a SAR 7 at 6, 12 and 18 months during their certification period.

With No Earned Income

These households must submit a SAR 7 at 12 months during their certification period.

GOOD CAUSE FOR FAILURE TO SUBMIT A SAR 7

CDSS anticipates that the impacted population, homeless, elderly/disabled, and migrant seasonal farmworker households, may experience some confusion and difficulty during the transition to SAR. This may result in households not submitting their SAR 7 report on time due to their lack of familiarity with the process. It is critical that eligible households do not lose benefits during this transition period. To mitigate this possibility, CWDs should utilize the “extenuating circumstances” provision under the good cause regulations for the first twelve months subsequent to implementation for each affected household. Good cause criteria are listed under MPP Sections 40-181.23 and 63-508.64.

Good cause provides for discontinuances due to non-submission of the SAR 7 to be rescinded with no loss of benefits when the household cannot reasonably be expected to fulfill his or her reporting responsibilities due to factors outside of his or her control.

Refer to the following guidelines when implementing good cause:

- Good cause may be granted if the household submits their SAR 7 after the extended filing date, but no later than the last day of the month following termination.
- After the twelve-month transition period for the elimination of change reporting, if a household submits its SAR 7 after the extended filing date, but in the month following termination, the CWD must apply the Restoration of Aid rules as described in ACL 12-25, page 18.
- If a household submits their SAR 7 later than the last day of the month following termination, the household must file a new application if they wish to continue to receive benefits.
- Eligibility staff must clearly document in the case record why good cause has been approved.

Example 1: A homeless household in a C-IV county converts from CR to SAR effective July 1, 2016. The household was initially certified in September 2015 and is due for recertification in August 2016. The household’s first SAR 7 is due in February 2017. If the household submits their SAR 7 in March 2017, but after the extended filing date, good cause will be approved and documented in the case record and benefits will be restored effective March 1, 2017 with no break in aid.

Example 2: Same scenario as described above. If the household submits the SAR 7 in April 2017, the CWD will discontinue the case for failure to submit a complete SAR 7 and the household must reapply for benefits.

Example 3: Same scenario as described above. The household submits the first SAR 7 on time. The household is then recertified until August 2017. Their next SAR 7 is due

February 2018. Because this is beyond 12 months from conversion for this household, good cause will not be applied for a late SAR 7 unless the household meets existing criteria for good cause.

CalFresh PROGRAM QUALITY CONTROL

No special procedures are required for these cases. There is no hold-harmless period and QC staff will continue reviewing cases using standard review procedures.

REGIONAL TRAININGS

CDSS will be coordinating with CalFresh Outreach staff to present workshops and webinars on the elimination of CR to CWD's, outreach partners, and advocate organizations. CDSS also anticipates conducting regional training sessions for county trainers in the spring of 2016.

CAMERA READY COPIES AND TRANSLATIONS

For camera-ready copies in English, contact the Forms Management Unit at <mailto:fmudss@dss.ca.gov>. If your office has internet access you may obtain this form from the CDSS webpage at http://www.dss.cahwnet.gov/cdssweb/FormsandPu_271.htm.

When all translations are completed per MPP section 21-115.2, including the Spanish form, they are posted on an on-going basis on our web site. Copies of the translated forms can be obtained at http://www.dss.cahwnet.gov/cdssweb/FormsandPu_274.htm.

For questions on translated materials, please contact Language Services at (916) 651-8876. Until translations are available, recipients who have elected to receive materials in languages other than English should be sent the English version of the form or notice along with the [GEN 1365-Notice of Language Services](#) and a local contact number.

The CWDs shall ensure that effective bilingual services are provided. This requirement may be met through utilization of paid interpreters, qualified bilingual employees, and qualified employees of other agencies or community resources. These services shall be provided free of charge to the applicant/recipient. In the event that CDSS does not provide translations of a form, it is the county's responsibility to provide the translation if an applicant or recipient requests it. More information regarding translations can be found in MPP Section 21-115.

This ACL and other CDSS Letters and Notices are available on the internet at: <http://www.dss.cahwnet.gov/lettersnotices/default.htm>

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If you have any questions regarding this ACL, please contact the CalFresh Policy Bureau at (916) 654-1896.

Sincerely,

Original Document Signed By:

TODD R. BLAND
Deputy Director
Welfare to Work Division

Attachments

Attachment 1 – SAR 7 Calendars

Homeless/Migrant Seasonal Farmworker Households – 12 Month Certification Periods

CalWIN

Certification Month	Conversion Month	SAR 7 Data Month	SAR 7 Due 6 th Month	Recertification Month
August 2015	June 1, 2016	December 2016*	January 2017*	July 2016
September 2015	June 1, 2016	January 2017*	February 2017*	August 2016
October 2015	June 1, 2016	February 2017*	March 2017*	September 2016
November 2015	June 1, 2016	March 2017*	April 2017*	October 2016
December 2015	June 1, 2016	April 2017*	May 2017*	November 2016
January 2016	June 1, 2016	May 2016	June 2016	December 2016
February 2016	June 1, 2016	June 2016	July 2016	January 2017
March 2016	June 1, 2016	July 2016	August 2016	February 2017
April 2016	June 1, 2016	August 2016	September 2016	March 2017
May 2016	June 1, 2016	September 2016	October 2016	April 2017
June 2016	June 1, 2016	October 2016	November 2016	May 2017
July 2016	June 1, 2016	November 2016	December 2016	June 2017
August 2016	June 1, 2016	December 2016	January 2017	July 2017
September 2016	June 1, 2016	January 2016	February 2017	August 2017
October 2016	June 1, 2016	February 2016	March 2017	September 2017
November 2016	June 1, 2016	March 2016	April 2017	October 2017
December 2016	June 1, 2016	April 2016	May 2017	November 2017

C-IV/LEADER/LRS

Certification Month	Conversion Month	SAR 7 Data Month	SAR 7 Due 6 th Month	Recertification Month
August 2015	July 1, 2016	December 2016*	January 2017*	July 2016
September 2015	July 1, 2016	January 2017*	February 2017*	August 2016
October 2015	July 1, 2016	February 2017*	March 2017*	September 2016
November 2015	July 1, 2016	March 2017*	April 2017*	October 2016
December 2015	July 1, 2016	April 2017*	May 2017*	November 2016
January 2016	July 1, 2016	May 2017*	June 2017*	December 2016
February 2016	July 1, 2016	June 2016	July 2017*	January 2017
March 2016	July 1, 2016	July 2016	August 2016	February 2017
April 2016	July 1, 2016	August 2016	September 2016	March 2017
May 2016	July 1, 2016	September 2016	October 2016	April 2017
June 2016	July 1, 2016	October 2016	November 2016	May 2017
July 2016	July 1, 2016	November 2016	December 2016	June 2017
August 2016	July 1, 2016	December 2016	January 2017	July 2017
September 2016	July 1, 2016	January 2017	February 2017	August 2017
October 2016	July 1, 2016	February 2017	March 2017	September 2017
November 2016	July 1, 2016	March 2017	April 2017	October 2017
December 2016	July 1, 2016	April 2017	May 2017	November 2017

* Due to timing of the conversion from CR to SAR, these households will not be subject to SAR reporting in implementation years, but will still be subject to SAR rules ongoing.

Elderly/Disabled Households w/ Earned Income – 24 Month Certification Periods

CalWIN

Certification Month	Conversion Month	SAR 7 Due 6 th Month	SAR 7 Due 12 th Month	SAR 7 Due 18 th Month	Recertification Month
August 2015	June 1, 2016	January 2016	July 2016	January 2016	July 2017
September 2015	June 1, 2016	February 2016	August 2016	February 2016	August 2017
October 2015	June 1, 2016	March 2016	September 2016	March 2016	September 2017
November 2015	June 1, 2016	April 2016	October 2016	April 2016	October 2017
December 2015	June 1, 2016	May 2016	November 2016	May 2016	November 2017
January 2016	June 1, 2016	June 2016	December 2016	June 2016	December 2017
February 2016	June 1, 2016	July 2016	January 2017	July 2016	January 2018
March 2016	June 1, 2016	August 2016	February 2017	August 2016	February 2018
April 2016	June 1, 2016	September 2016	March 2017	September 2016	March 2018
May 2016	June 1, 2016	October 2016	April 2017	October 2016	April 2018
June 2016	June 1, 2016	November 2016	May 2017	November 2016	May 2018
July 2016a	June 1, 2016	December 2016	June 2017	December 2016	June 2018
August 2016	June 1, 2016	January 2017	July 2017	January 2017	July 2018
September 2016	June 1, 2016	February 2017	August 2017	February 2017	August 2018
October 2016	June 1, 2016	March 2017	September 2017	March 2017	September 2018
November 2016	June 1, 2016	April 2017	October 2017	April 2017	October 2018
December 2016	June 1, 2016	May 2017	November 2017	May 2017	November 2018

C-IV/LEADER/LRS

Certification Month	Conversion Month	SAR 7 Due 6 th Month	SAR 7 Due 12 th Month	SAR 7 Due 18 th Month	Recertification Month
August 2015	July 1, 2016	January 2016	July 2016	January 2016	July 2017
September 2015	July 1, 2016	February 2016	August 2016	February 2016	August 2017
October 2015	July 1, 2016	March 2016	September 2016	March 2016	September 2017
November 2015	July 1, 2016	April 2016	October 2016	April 2016	October 2017
December 2015	July 1, 2016	May 2016	November 2016	May 2016	November 2017
January 2016	July 1, 2016	June 2016	December 2016	June 2016	December 2017
February 2016	July 1, 2016	July 2016	January 2017	July 2016	January 2018
March 2016	July 1, 2016	August 2016	February 2017	August 2016	February 2018
April 2016	July 1, 2016	September 2016	March 2017	September 2016	March 2018
May 2016	July 1, 2016	October 2016	April 2017	October 2016	April 2018
June 2016	July 1, 2016	November 2016	May 2017	November 2016	May 2018
July 2016a	July 1, 2016	December 2016	June 2017	December 2016	June 2018
August 2016	July 1, 2016	January 2017	July 2017	January 2017	July 2018
September 2016	July 1, 2016	February 2017	August 2017	February 2017	August 2018
October 2016	July 1, 2016	March 2017	September 2017	March 2017	September 2018
November 2016	July 1, 2016	April 2017	October 2017	April 2017	October 2018
December 2016	July 1, 2016	May 2017	November 2017	May 2017	November 2018

Elderly/Disabled Households w/ No Earned Income – 24 Month Certification Periods

CalWIN

Certification Month	Conversion Month	SAR 7 Data Month	SAR 7 Due 12 th Month	Recertification Month
August 2015	June 1, 2016	June 2016	July 2016	July 2017
September 2015	June 1, 2016	July 2016	August 2016	August 2017
October 2015	June 1, 2016	August 2016	September 2016	September 2017
November 2015	June 1, 2016	September 2016	October 2016	October 2017
December 2015	June 1, 2016	October 2016	November 2016	November 2017
January 2016	June 1, 2016	November 2016	December 2016	December 2017
February 2016	June 1, 2016	December 2016	January 2017	January 2018
March 2016	June 1, 2016	January 2017	February 2017	February 2018
April 2016	June 1, 2016	February 2017	March 2017	March 2018
May 2016	June 1, 2016	March 2017	April 2017	April 2018
June 2016	June 1, 2016	April 2017	May 2017	May 2018
July 2016a	June 1, 2016	May 2017	June 2017	June 2018
August 2016	June 1, 2016	June 2017	July 2017	July 2018
September 2016	June 1, 2016	July 2017	August 2017	August 2018
October 2016	June 1, 2016	August 2017	September 2017	September 2018
November 2016	June 1, 2016	September 2017	October 2017	October 2018
December 2016	June 1, 2016	October 2017	November 2017	November 2018

C-IV/LEADER/LRS

Certification Month	Conversion Month	SAR 7 Data Month	SAR 7 Due	Recertification Month
August 2015	July 1, 2016	June 2016	July 2016	July 2017
September 2015	July 1, 2016	July 2016	August 2016	August 2017
October 2015	July 1, 2016	August 2016	September 2016	September 2017
November 2015	July 1, 2016	September 2016	October 2016	October 2017
December 2015	July 1, 2016	October 2016	November 2016	November 2017
January 2016	July 1, 2016	November 2016	December 2016	December 2017
February 2016	July 1, 2016	December 2016	January 2017	January 2018
March 2016	July 1, 2016	January 2017	February 2017	February 2018
April 2016	July 1, 2016	February 2017	March 2017	March 2018
May 2016	July 1, 2016	March 2017	April 2017	April 2018
June 2016	July 1, 2016	April 2017	May 2017	May 2018
July 2016	July 1, 2016	May 2017	June 2017	June 2018
August 2016	July 1, 2016	June 2017	July 2017	July 2018
September 2016	July 1, 2016	July 2017	August 2017	August 2018
October 2016	July 1, 2016	August 2017	September 2017	September 2018
November 2016	July 1, 2016	September 2017	October 2017	October 2018
December 2016	July 1, 2016	October 2017	November 2017	November 2018

INFORMATIONAL NOTICE TO CALFRESH RECIPIENTS IMPORTANT – PLEASE READ

This notice is for information only. There is nothing you need to do at this time.

State Law Change for CalFresh Recipients

You are getting this form because you are a change reporting household.

Starting _____, you will no longer be a
DATE
change reporting household. After _____,
DATE
you will be a semi-annual reporting household. This is because of a change in state law.

What will this mean?

Starting _____, you will no longer have to
DATE
report all changes to your worker within 10 days.

You will only be required to report when your income goes above a certain amount. The county will tell you this amount when the change happens.

Also, you will have to turn in a form called the SAR 7 Eligibility Status Report. We will send you this form when it is time to turn it in.

What do I need to do now?

Until _____, you will still have to report all
DATE
changes to your worker within 10 days.

How will this change your benefits?

This will not change the amount of your benefits. Your benefits will still be calculated the same way.

Where can I get more information?

If you would like more information on this change you may call or visit your county office.