

DEPARTMENT OF SOCIAL SERVICES

744 P Street, Sacramento, California 95814



March 27, 2007

ALL COUNTY INFORMATION NOTICE NO. I-11-07

TO: ALL COUNTY WELFARE DIRECTORS
ALL FOOD STAMP COORDINATORS
ALL CaIWORKS PROGRAM SPECIALISTS
CONSORTIUM PROJECT MANAGERS
ALL QUALITY CONTROL COORDINATORS

REASON FOR THIS TRANSMITTAL

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

SUBJECT: SUPPLEMENTAL FORMS FOR THE FOOD STAMP (FSP) AND CALIFORNIA WORK OPPORTUNITY AND RESPONSIBILITY TO KIDS PROGRAM (CaIWORKs)

REFERENCE: ALL COUNTY LETTER (ACL) 02-06, MANUAL OF POLICIES AND PROCEDURES (MPP) SECTIONS 40-101.12, 40-101.17, 63-102(p)(6), 63-300.21, 63-300.321, AND FEDERAL REGULATIONS 7 CFR 273.2(a) AND 7 CFR 273.2(b)

Food Stamp Program (FSP)

The intent of this letter is to explain the differences between "pre-screening" and "supplemental forms," which have different meanings and usages. A supplemental form is a term used to describe the practice of gathering information needed to begin an interactive interview after the initial application is signed, where eligibility questions are not duplicated. Pre-screening is a term used to describe a form used to collect eligibility data, which are generally duplicative of questions on the application, prior to the household signing an application.

Pre-screening forms are not permissible in the FSP per Manual of Policies and Procedures (MPP) Section 63-300.21 and Federal Regulations 7 CFR 273.2(a). These sections state that counties shall not impose or require applicants to complete any county developed pre-screening forms, or impose any additional application or application processing requirements beyond the (SAWS)1 and 2 or (DFA) 285 A1 and A2 for food stamps. Screening forms are not used to determine eligibility. MPP Section 63-102(p) (6) defines impermissible pre-screening forms as "those gathering information prior to filing an application to perform a preliminary review of eligibility for participation in the FSP." Pre-screening does not include gathering of information to refer an applicant to the appropriate programs or office, other than the program to which the individual is

applying.

Counties are allowed to develop and use supplemental forms as long as the supplemental form is not handed out in place of the food stamp application and the applicant is not completing duplicate information found on the food stamp application. The application forms solicit all information necessary to determine eligibility. Therefore, any questions on the supplemental form must request only information which the county is permitted to solicit. Counties may provide informational material along with the supplemental forms (MPP Sections 63-300.21 and 63-300.321).

Applications have two parts: the (SAWS) 1 or (DFA) 285 A1 and the (SAWS) 2 or (DFA) 285 A2 Statement of Facts. Some counties distribute both prior to the applicant's interview. For these counties, supplemental forms are unnecessary and should not be used for the application. Other counties start an interactive interview solely from the information on the one page initial sheet, the (SAWS) 1 or (DFA) 285 A1. For these counties, a supplemental form may be used to start the interactive interview. Questions on the supplemental form cannot be asked again in the interview, so as to not be duplicative. For example, counties that start the interview with only the (SAWS) 1 or (DFA) 285 A1 forms can have a supplemental form requesting household member names and social security numbers, so the county can check to see if it has existing information in its database to update, or if the county needs to enter all new information and also to schedule for Expedited Services (ES). When the county then does the interactive interview, it would not re-ask these questions.

CalWORKs Program

While there are no express regulations that prohibit the use of pre-screening forms in the CalWORKs program, MPP Sections 40-101.12 and .17 require counties to process any request for public assistance promptly and without eliciting any unnecessary information. For families who are applying for both CalWORKs and Food Stamps, since the FSP prohibits the use of pre-screening forms, counties may not use a pre-screening form for these families. For families applying for CalWORKs benefits only, CDSS strongly encourages counties to avoid using pre-screening forms that are not permitted under FSP rules in order to maintain consistency between program rules and not include unnecessary steps for applicants.

Descriptions of Acceptable Supplemental Forms

In the FSP, the county cannot ask the applicant to complete supplemental forms described below prior to receiving a signed application from the applicant household as provided in MPP Section 63-300.21 and 63-102(p) (6) and federal regulation, 7 CFR 273.2(b) and 273.2(a).

Acceptable Supplemental Forms Include:

- A form designed to make inquiries of the household on whether the household would like information on or referrals to Family Planning, Mental Health,

Substance Abuse or Domestic Violence Counseling, Social Security/SSI application assistance, child care resources, etc.

- A form used to expedite the application process in automated environments and to enhance administrative operations, such as asking for enough information to begin the interview process and accelerate the interview/eligibility process.
- A form in which a household is not completing duplicative questions. For example, it is unacceptable, after the household has completed the application form which asks questions for ES to then ask the household to complete a supplemental form asking for the same ES information or vice versa.
- A form which asks for Social Security Numbers (SSN) or household member information for purposes of starting the automated process by “loading in” the information onto an interactive automated system where the applicant is not asked to complete duplicative questions and where the eligibility worker is entering information during the interview session.

When a supplemental form is used in conjunction with an interactive interview, the “Statement of Facts,” part two of the application, is printed with answers given during the interview. After providing the applicant an opportunity to review the answers, the county would then ask the applicant to sign the electronic generated statement of facts.

If the CWD uses allowable supplemental forms, the California Department of Social Services recommends that a statement be clearly printed on the form making clear that applicants do not have to submit the supplemental form to apply for benefits.

If you have any questions regarding this notice, please contact Rosie Avena, Analyst, Food Stamp Policy Implementation Unit, at (916) 654-1514 or e-mail rosie.avena@dss.ca.gov. For CalWORKs matters, contact your CalWORKs County Consultant.

Sincerely,

Original Document Signed By:

RICHTON YEE, Chief
Food Stamp Branch

Original Document Signed By:

KÄREN N. DICKERSON, Chief
Employment and Eligibility Branch