



CDSS

WILL LIGHTBOURNE
DIRECTOR

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

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EDMUND G. BROWN JR.
GOVERNOR

REASON FOR THIS TRANSMITTAL

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

February 16, 2018

ALL COUNTY LETTER (ACL) NO. 18-18

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

SUBJECT: CALFRESH CHANGES TO REPORTING REQUIREMENTS

REFERENCES: [TITLE 7 CODE OF FEDERAL REGULATIONS \(CFR\) §273.12; 7 CFR §273.13; ACL NO. 15-90; ACL NO. 12-25E; ACL NO. 12-25; SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM \(SNAP\): ELIGIBILITY, CERTIFICATION, AND EMPLOYMENT AND TRAINING PROVISIONS OF THE FOOD, CONSERVATION AND ENERGY ACT OF 2008; MANUAL OF POLICIES AND PROCEDURES \(MPP\), SECTION 63-500](#)

The purpose of this ACL is to provide implementing instructions to County Welfare Departments (CWDs) regarding federal regulation changes to SNAP simplified reporting requirements ([7 CFR §273.12](#)) as implemented in the CalFresh program. Changes to simplified reporting requirements include a new threshold amount for reportable changes in unearned income that are actionable by CWDs at the periodic report, clarification regarding when households are to make required mid-period reports, and CWD action on incomplete periodic report forms. Additionally, this letter transmits a copy of the new *SAR 7 Reminder Notice (CF 30)*, a copy of the *Large Print SAR 7 Reminder Notice (CF 30 LP)*, and provides usage guidance. These provisions are intended to reduce barriers to program participation.

The United States Department of Agriculture, Food and Nutrition Service (FNS) recently issued a final rule implementing provisions of the Food, Conservation and Energy Act of 2008. The new regulations were effective May 8, 2017.

7 CFR §273.12(a)(1)(i)(A): Reportable Changes in Unearned Income

New regulations at [7 CFR §273.12\(a\)\(1\)\(i\)\(A\)](#) update the threshold for reporting changes in unearned income at the periodic report from \$50 to \$100. These new regulations apply to simplified reporting households as outlined under [7 CFR §273.12\(a\)\(5\)\(iii\)\(C\)](#). All CalFresh households are simplified reporting households. Therefore, these new regulations apply to all CalFresh households. Furthermore, the new threshold applies only to the periodic report or *Eligibility Status Report (SAR 7)* form.

The amount of unearned income reported on the SAR 7 form that is actionable by the CWDs is \$100 or more. This only applies to unearned income. This policy change will not result in any changes to the SAR 7 form, and there will be no changes to the household's responsibility to report. This will reduce client confusion regarding what is required to be reported, particularly in the future when the threshold amount is indexed as newly required under [7 CFR §273.12\(a\)\(1\)\(i\)\(D\)](#) and outlined below.

The CWD will determine whether the change in unearned income reported by the household is under or over \$100 from the last reported unearned income amount (e.g. at initial certification or recertification). If a reported change in a household's unearned income is over \$100, the CWD must act to determine continuing eligibility for benefits. If a reported change in a household's unearned income is under \$100, the CWD shall disregard the reported change.

7 CFR §273.12(a)(1)(i)(D): Indexing Reportable Changes in Unearned Income

New regulations at [7 CFR §273.12\(a\)\(1\)\(i\)\(D\)](#) require that the above-mentioned threshold be indexed over time.

Beginning Federal Fiscal Year 2018, the threshold for reporting changes in unearned income at the periodic report, as outlined above, will be adjusted annually and rounded to the nearest \$25. The threshold will increase over time and will only be indexed in increments of \$25. The CDSS will issue a letter specifying any increase to the threshold for reportable changes in unearned income at the periodic report.

7 CFR §273.12(a)(2): Mandatory Mid-Period Reports

Households are required to make mandatory mid-period reports within 10 days of the date the change becomes known to the household.

As a reminder, California has two mandatory mid-period reports that must be made by the household during the certification period and must be acted on by the CWD: (1) a report of gross monthly income over the Income Reporting Threshold (IRT) and (2) a report of a drop in Able-Bodied Adult Without Dependents (ABAWD) hours worked below 20 hours per week, averaged monthly, for ABAWDs subject to the time limit.

For a mandatory mid-period report of gross monthly income over the IRT, the term “known to the household” means that a household must report within 10 days of receipt of the first payment attributable to the change, i.e. the first payment that places the household over the IRT.

For a mandatory mid-period report of a drop in ABAWD work hours, the term “known to the household” means that a household must report within 10 days of the date the drop in work hours becomes known to the household.

7 CFR §273.12(a)(5)(iii)(E): CWD Action On Incomplete SAR 7 Forms

Amendments made to this subsection of the federal regulations specify that CWDs are now required to send a new reminder notice to households that fail to file a complete SAR 7 form by the specified filing date. If a household fails to file a complete SAR 7 form by the 5th of the month (the date after which a SAR 7 is considered late), the CWD shall provide the household with a reminder notice advising the household that it has 10 days from the date the CWD mails the reminder notice to file a complete SAR 7 form.

Please note that “households that fail to file a complete SAR 7 form” includes both households that have not turned in a SAR 7 form by the due date and households that have turned in a SAR 7 form by the due date, but the SAR 7 form is missing required information and is therefore considered incomplete.

New SAR 7 Reminder Notice

The CDSS has developed a new *SAR 7 Reminder Notice (CF 30)* to serve as the required reminder notice for households who fail to turn in a complete SAR 7 form between the 1st and 5th of the submit month. As mentioned, this letter transmits a copy of the new CF 30.

Households are notified that the specified filing date for the SAR 7 form is the 5th of the submit month. If a household fails to file a complete SAR 7 form between the 1st and 5th of the submit month, the CWD shall send the CF 30 on the 6th day of the submit month. The CF 30 will inform the household that it has 10 days from the date the CWD mails the notice to file a complete SAR 7 form. Note that if the 6th day of the submit month falls on a weekend or holiday, the CWD shall send the CF 30 the following business day.

If the household responds to the CF 30 with a complete SAR 7 form within 10 days of the date the CWD mailed the notice, the CWD must provide the household the opportunity to participate no later than 10 days after the household's normal issuance date.

If the household fails to respond to the CF 30 with a complete SAR 7 form within 10 days of the date the CWD mailed the notice, the CWD must discontinue the household

with adequate notice. The CWD will send out the *NA 960X SAR Notice of Action* or the *NA 960Y SAR Notice of Action*, as appropriate, so that the household will receive it no later than the household's normal issuance date.

Please note that the new CF 30 cannot be combined with any other notice. The CWD may choose to send the optional SAR 90 Reminder Letter any time after the CF 30 is sent as an additional reminder for households.

Please see the attachment for a visual timeline of when to send the CF 30 and other Notices of Action using February as an example month.

Large Print SAR 7 Reminder Notice

The CDSS is dedicated to serving and improving accessibility for its disabled population. To move towards this commitment, the *Large Print SAR 7 Reminder Notice (CF 30 LP)* was created using size 18 font to be more easily readable to individuals who have low vision impairment.

The purpose of the CF 30 LP has not changed from the regular CF 30, as described above. The CWDs shall send the CF 30 LP to individuals who request the CF 30 they received in a larger print, as needed.

CalFresh Manual of Policy and Procedure (MPP)

Language under [MPP §63-500](#), relating to reporting requirements and action on information received during the certification period will be updated as soon as administratively feasible.

Required Form – No Substitutes Permitted

The CF 30 is a required form. No substitutes are permitted. Forms in this category may not be modified or restructured by the CWD or consortium. However, overprinting or reformatting and Electronic Data Processing (EDP) modification are permitted. Overprinting is defined as a process in which the CWD prints additional information over a currently required form without modifying the format, structure, or legal content of the form.

The following have been identified as acceptable overprinting purposes and do not require state approval: (a) to identify the CWD, (b) to add information to the "County Use Only" section, or (c) to added Eligibility Worker instructions. Overprinting or EDP modification for purposes other than those specified must be pre-approved by CDSS before use of the form by the CWD. More information regarding the form types and the CWD modification procedures can be found in MPP section 23-400 located on the CDSS webpage at <http://www.cdss.ca.gov/ord/entres/getinfo/pdf/opsman3.pdf>.

Camera Ready Copies and Translations

For a camera-ready copy in English, contact the CDSS Forms Management Unit at fmudds@dss.ca.gov. You may obtain these forms from the CDSS webpage at: <http://www.cdss.ca.gov/inforesources/Forms-Brochures/Forms-by-Program>.

When all translations are completed per [MPP §21-115.2](#), they are posted on an on-going basis on the CDSS webpage. Copies of the translated forms can be obtained at: <http://www.cdss.ca.gov/inforesources/Translated-Forms-and-Publications>.

For questions on translated materials, please contact the CDSS Language and 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. <http://www.cdss.ca.gov/cdssweb/entres/forms/Multi/GEN1365MUL.pdf>

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 CWD's responsibility to provide interpreter services if an applicant or recipient requests them. In addition, the CWDs shall ensure that individuals with disabilities are provided services such as auxiliary aids and services to persons who are deaf or hearing impaired, or persons with impaired speech, vision, or manual skills where necessary. More information regarding translations can be found in [MPP §21-115](#).

This ACL and other CDSS Letters and Notices are available on the internet at: <http://www.cdss.ca.gov/inforesources/Letters-and-Notices>.

For CalFresh program questions, please contact the CalFresh Policy Bureau at (916) 651-8047.

Sincerely,

Original Document Signed By:

TODD R. BLAND
Deputy Director
Family Engagement and Empowerment Division

Attachments

SAR 7 Reminder Notice (CF 30) Timeline

Sun	Mon	Tue	Wed	Thu	Fri	Sat
1	2	3	4	5 <u>SAR 7 form due</u>	6 <u>Send CF 30</u> if SAR 7 form incomplete or not received	7 Day 1
8 Day 2	9 Day 3	10 Day 4	11 Day 5	12 Day 6	13 Day 7	14 Day 8
15 Day 9	16 Holiday Day 10	17 <u>Send Notice of Action</u> (NA 960Y SAR or NA 960X SAR, as appropriate)	18 Day 1	19 Day 2	20 Day 3	21 Day 4
22 Day 5	23 Day 6	24 Day 7	25 Day 8	26 Day 9	27 Day 10	28
1	2 <u>Discontinue</u> if household does not respond to Notice of Action					

*Option: The CWD may choose to send the optional SAR 90 Reminder Letter any time after the SAR 7 Reminder Notice (CF 30) is sent as an additional reminder for households.

SAR 7 REMINDER NOTICE

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

Case Name : _____
Case Number : _____
Worker Name : _____
Worker Number : _____
Telephone Number : _____
Notice Date : _____

On _____, you have either not turned in your Eligibility Status Report (SAR 7) **or** you turned it in but it is not complete.

You must turn in a **completed** SAR 7 on or before _____ in order to continue getting benefits. If you turn in a complete SAR 7 before the end of this month, your benefits may continue.

If you need help understanding this notice or completing the SAR 7, please contact your County office.

Important Note for households also receiving CalWORKs: if your benefits are discontinued because you fail to turn in a complete SAR 7, you will not receive Transitional CalFresh benefits. If you have any questions about Transitional CalFresh, please contact your County office.

SAR 7 REMINDER NOTICE

Case Name:_____

Case Number:_____

Worker Name:_____

Worker Number:_____

Telephone Number:_____

Notice Date:_____

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