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ALL COUNTY LETTER (ACL) NO. 19-33

TO: ALL COUNTY WELFARE DIRECTORS
ALL CALFRESH PROGRAM SPECIALISTS
ALL CALWORKS PROGRAM SPECIALISTS
ALL COUNTY IEVS COORDINATORS
ALL COUNTY SPECIAL INVESTIGATIVE UNIT CHIEFS

SUBJECT: CALWORKS AND CALFRESH: NATIONWIDE PRISONER
MATCH AND DECEASED PERSONS MATCH PROCESSING
GUIDANCE

REFERENCE: 7 CODE OF FEDERAL REGULATION (CFR) SECTIONS [273.12](#),
[272.13](#) AND [272.14](#); WELFARE AND INSTITUTIONS CODE
SECTIONS [11004](#) AND [11450.05](#); CDSS MANUAL OF POLICIES
AND PROCEDURES (MPP) SECTIONS [22-001](#), [22-071](#), [22-072](#),
[44-316](#); ALL COUNTY LETTERS (ACL) [12-25](#), [16-90](#), [17-41](#), AND
[18-20](#); [QUESTIONS & ANSWERS CONCERNING SNAP:
ELIGIBILITY, CERTIFICATION, AND EMPOWERMENT AND
TRAINING PROVISIONS OF THE FOOD, CONSERVATION AND
ENERGY ACT OF 2008 FINAL RULE – SET #2; FOOD,
CONSERVATION AND ENERGY ACT OF 2008](#)

The purpose of this All County Letter (ACL) is to provide County Welfare Departments (CWDs) with the verification and notification processes required for the Nationwide Prisoner Match (NPM) and the Deceased Persons Match (DPM). With the passage of the [Food, Conservation and Energy Act of 2008](#), additional language was added to the federal regulations concerning notification to the client. Although the updated regulation pertains only to CalFresh, this ACL will provide guidance on both CalFresh and California Work Opportunity and Responsibility to Kids (CalWORKs) programs.

Nationwide Prisoner Match (NPM)

The NPM matches the Social Security numbers (SSNs) of CalFresh and CalWORKs recipients on aid with those of individuals incarcerated in federal, state, and local correctional institutions. Incarceration is not a mandatory mid-period report, except in Annual Renewal Child-Only (AR/CO) cases. However, when a CWD becomes aware of an incarceration, the CWD must take action mid-period. As a result, the match will often result in the disqualification of individuals currently receiving aid. However, a CalWORKs overpayment (OP) or CalFresh overissuance (OI) may only be assessed under specific circumstances as outlined below. For guidance on AR/CO cases, see the section titled *NPM and DPM for CalWORKs AR/CO Cases (page 4)*.

Upon receipt of an NPM match, the CWD must seek third-party verification from the appropriate Law Enforcement Agency (LEA) to determine the time period of the incarceration. If the information is not verified by the third-party source or the CWD cannot readily determine the effect on the assistance unit (AU) or household (HH), the information is considered unclear and the CWD must follow the process summarized in the section titled *Action on Unclear Information (page 4)*.

If the LEA verifies the time period of the incarceration and the CWD can readily determine the effect on the AU/HH's continued eligibility or benefit allotment, the information is considered clear and the CWD does not need to send a notice of match results to the AU/HH ([Questions & Answers Concerning SNAP: Eligibility, Certification, and Employment and Training Provisions of the Food, Conservation and Energy Act of 2008 Final Rule – Set #2, Q. 12](#)).

FOR CALFRESH: Once the information is verified and clear, the CWD must take the following actions:

- If an adult member of the HH was incarcerated for more than 30 days and is still incarcerated, the CWD must send a notice of action to remove the individual from the HH and adjust benefits accordingly ([7 CFR § 273.13](#)).
- If the HH member was incarcerated during a data month and the HH did not report the missing household member, the CWD must assess whether an OI should be established and send a notice of action, as appropriate ([ACL 12-25](#)).
- If the individual is no longer incarcerated and was not incarcerated during a data month, the CWD must mark the match as “no discrepancy” and take no action.

FOR CALWORKS: Once the information is verified and clear, the CWD must take the following actions:

- If the adult individual was incarcerated on the first of a calendar month, is expected to remain incarcerated for one full calendar month or more, and is still

incarcerated, the CWD must send a notice of action to remove the individual from the AU and adjust benefits accordingly ([MPP § 44-316.331\(s\)](#)).

- If the adult individual was incarcerated for a full calendar month when the AU was initially granted aid or recertified at SAR or redetermination, and the AU did not report the missing AU member, the CWD must assess whether an OP should be established and send a notice of action, as appropriate ([WIC § 11004](#)).
- If the individual is no longer incarcerated and was not incarcerated during initial application, SAR, or redetermination, the CWD must close the match as “no discrepancy” or “no findings” and take no action.

Per [ACL 17-41](#), the 45-day processing rule does not apply to the NPM. Accordingly, a county's failure to remove an incarcerated individual from an AU or HH within the 45 days following a match is not a county error. However, CWDs are reminded that any OP/OI must be established by the quarter after the quarter in which the match was received. Since incarceration is not a mandatory mid-period report, an OP/OI is only established if the AU/HH fails to report the change in composition during initial application, SAR or Recertification/Redetermination.

Deceased Persons Match (DPM)

The DPM matches the SSNs of CalFresh and CalWORKs recipients on aid with those of individuals reported deceased according to the Social Security Administration. Death is not a mandatory mid-period report, except in AR/CO cases. However, when a CWD becomes aware of a death, the CWD must take action mid-period. As a result, the match will often result in the disqualification of individuals currently receiving aid. However, an OP or OI may only be assessed under specific circumstances as outlined below. For guidance on AR/CO cases, see the section titled *NPM and DPM for CalWORKs AR/CO Cases (page 4)*.

Upon receipt of a DPM match, the CWD must seek verification from third parties such as county offices of vital statistics, coroners' offices, and/or obituaries. If the information is not verified by a third party or the CWD cannot readily determine the effect of the death on the AU/HHs, the information is considered unclear and the CWD must follow the process summarized in the section titled *Action on Unclear Information (page 4)*.

If a third party does verify the death and the CWD can readily determine the effect on the AU/HH's continued eligibility or benefit allotment, the information is considered clear and the CWD does not need to send a notice of match results ([Questions & Answers Concerning SNAP: Eligibility, Certification, and Employment and Training Provisions of the Food, Conservation and Energy Act of 2008 Final Rule – Set #2, Q. 12](#)).

Once the information is verified and clear, the CWD will take the following actions:

- If the individual was verified as deceased, the CWD must send a notice of action to remove the individual from the AU/HH and adjust benefits accordingly.

- If the individual was deceased during a data month and the AU/HH did not report a household composition change, the CWD must assess whether an OP/OI should be established and send a notice of action, as appropriate. ([ACL 12-25](#); [WIC § 11004](#).)
- If the individual was verified as not deceased, the CWD must mark the match as “no discrepancy.” The CWD may contact the AU/HH regarding the inaccurate information at their discretion.
- If the deceased individual was a minor in a CalWORKs AU, please refer to [ACL 16-90](#) for guidance on when the CWD may remove the individual from the AU.

Per [ACL 17-41](#), the 45-day processing rule does not apply to the DPM. Accordingly, a county’s failure to remove a deceased individual from an AU or HH within the 45 days following a match is not a county error. However, CWDs are reminded that any OP/OI must be established by the quarter after the quarter in which the match was received. Since death is not a mandatory mid-period report, an OP/OI is only established if the AU/HH fails to report the change in composition during initial application, SAR or Recertification/Redetermination.

NPM and DPM for CalWORKs AR/CO Cases

For AR/CO cases, AU composition changes are mandatory mid-period reports, meaning that clients are required to report an incarceration or death of an AU member within 10 days and the CWD is required to recalculate benefits based on this change effective the first of the month following the change. OPs must be calculated according to the guidelines for mandatory mid-period reports. [ACL 16-90](#) addresses the death of a minor in an AR/CO case.

Action on Unclear Information

If the information in the NPM or DPM is not verified by a third party or the CWD cannot readily determine its effect on the AU/HH’s continued eligibility or benefit allotment, the information is considered unclear and the CWD must send a notice of match results to the recipient. The notice must clearly explain what information the household must provide and the consequences of failing to respond to the notice. If the household does not respond to the notice of match results or does respond but fails to provide sufficient information to clarify its circumstances, the CWD must remove the individual listed on the match from the household and adjust benefits accordingly. The CWD must issue a notice of adverse action at least ten (10) days before the adverse action is taken.

Any questions regarding this guidance may be emailed to PIBPolicy@dss.ca.gov.

Sincerely,

Original Document Signed By:

TODD BLAND, Assistant Director
Automation, Integrity, and Client Initiatives Branch