

ACL 20-55

June 12, 2020

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

EXECUTIVE SUMMARY

ALL COUNTY LETTER NO. 20-55

The purpose of this All County Letter is to provide County Welfare Departments with guidance regarding the requirement to report major changes in CalFresh operations to the California Department of Social Services.



KIM JOHNSON
DIRECTOR

STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
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GAVIN NEWSOM
GOVERNOR

June 12, 2020

ALL COUNTY LETTER (ACL) NO. 20-55

TO: ALL COUNTY WELFARE DIRECTORS
ALL CALFRESH PROGRAM MANAGERS

SUBJECT: CALFRESH: HOW TO REPORT MAJOR CHANGES IN PROGRAM
OPERATIONS

REFERENCE: UNITED STATES DEPARTMENT OF AGRICULTURE (USDA)
ADMINISTRATIVE NOTICE 16-07, USDA ADMINISTRATIVE NOTICE
16-10, [7 CFR 272.15\(a\)](#)

The purpose of this ACL is to provide County Welfare Departments (CWD) with guidance regarding the requirement to report major changes in CalFresh operations to the California Department of Social Services (CDSS). Specifically, this letter outlines the procedure for reporting a county level change that meets the definition of a major change to CDSS 180 days prior to implementation of the change or entering into a contract to implement the change.

Background

The USDA, Food and Nutrition Service (FNS) published the Supplemental Nutrition Assistance Program (SNAP) Review of Major Changes in Program Design and Management Evaluation Systems (known as the “Major Change Rule”) on January 19, 2016.

Reporting of Major Changes

Per 7 CFR §272.15(a), the CDSS must notify FNS of any major changes in SNAP operations no less than 120 days prior to implementation of the change or entering into a contract to implement the change.

For this purpose, a major change is defined as a:

- Closure of any local office that performs major functions for 750 or more CalFresh households with no other office within 35 miles, in the same county, to serve affected households.
- Substantial increased reliance on automated systems for the performance of responsibilities previously performed by county staff or changes in the way that applicants and participants interact with the CWD and automated systems. This includes, but is not limited to, the replacement of automated systems used in the certification process and the addition of functionality to existing automated systems used in the certification process.
- Change in operation that may potentially increase barriers to households' ability to report required information. This includes, but is not limited to, implementation of a call center or internet web portal for reporting changes, a major modification to forms that households use to report changes, or the discontinuation of an existing avenue for reporting changes.
- Reduction or change of the functions or responsibilities currently assigned to CalFresh merit system personnel.
- Decrease of more than five percent in the total number of merit system personnel involved in the CalFresh certification process in the county from one year to the next. In addition, a decrease of more than eight percent in the total number of CalFresh eligibility personnel involved in the CalFresh certification process in the county over a two-year period.
- Other major changes include, but are not limited to:
 - The opening of any office
 - The opening of a call or service center; or
 - Any change identified by CDSS or FNS as a major change.

The CDSS will report any statewide changes that meet the definition of a major change directly to FNS without requiring county action. That said, for CDSS to meet the requirement to report major changes within 120 days to FNS, CWDs must report any county level changes that meet the definition of a major change to CDSS 180 days prior to implementation of the change or entering into a contract to implement the change.

If the CWD is unable to meet the 180-day deadline, they must notify CDSS as soon as they are aware of the change and explain why they did not meet the deadline.

Method to Report the Major Change

To report a major change, the CWD must complete the attached FNS form titled *State Agency Notification of Major Changes in Program Design*.

The report is to be sent electronically to the CalFresh Technical Assistance and Evaluation Section, CWDCalFreshEvaluations@dss.ca.gov.

The CDSS will evaluate the major change and determine, with guidance from FNS, if additional reporting requirements, not limited to those listed below, are required.

A. The CWD implementing the change will be required to report the following monthly information to CDSS on a quarterly basis beginning with the quarter prior to implementation of the major change:

1. The number of initial applications received;
 - a. Of the number of initial applications received, the number subject to expedited service;
 - b. Of the number of initial applications received, the number broken out by method of application (i.e., in-person, online, telephone, mail, fax);
2. The number of initial applications that are approved timely;
 - a. Of the number of initial applications approved timely, the number subject to expedited service processed within the 3-day processing requirement;
 - b. Of the number of initial applications approved timely, the number subject to expedited service processed within the 7-day processing requirement;
3. The number of initial applications that are approved untimely;
 - a. Of the number of initial applications approved untimely, the number subject to expedited service processed outside the 3-day processing requirement;
 - b. Of the number of initial applications approved untimely, the number subject to expedited service processed outside the 7-day processing requirement;
4. The number of initial applications that are denied;
 - a. Of the number of initial applications that were denied, the number broken out by those denied due to ineligibility and those denied because the CWD was unable to determine eligibility;
5. The total number of households due for recertification;
6. The number of recertification applications received;
 - a. Of the number of recertification applications received, the number broken out by method of application (i.e., in-person, online, telephone, mail, fax);
7. The number of households that were recertified without a delay or break in benefits;
8. The number of households that the CWD recertifies with a delay or break in benefits of less than one month;
 - a. Of the total number of households due for, the number of households that fail to reapply for recertification by the required deadline;
9. The number of recertification applications that are denied; and

- a. Of the number of recertification applications that were denied, the number broken out by those denied due to ineligibility and those denied because the CWD was unable to determine eligibility.

B. The information above must be reported separately for households with elderly members and households with members that have a disability.

The CDSS will report the information received from the CWD to FNS as required within 120 days of implementation of the change or entering into a contract to implement the change.

In addition to the information outlined above, FNS may require additional information to be included in a quarterly report. FNS reserves the right to require the information it needs to determine the impact of a major change on program integrity and access. CDSS will work with the CWD to determine what additional information is practicable and require only the data that is necessary and not otherwise available from ongoing reporting mechanisms. Depending on the nature of the major change, CWDs may be required to report more specific or timely information concerning the impact of the major change within the following areas:

- *Payment accuracy.* FNS will use Quality Control (QC) data when possible but may require additional data from case reviews focused on households with specific characteristics, to obtain greater local reliability or to provide more timely data.
- *Negative error rates.* FNS will use QC data when possible but may require additional data from case reviews focused on households with specific characteristics, to obtain greater local reliability or to provide more timely data on the causes of incorrect denials.
- *Impact on households with specific characteristics.* In addition to the information obtained using QC data, a major change that could disproportionately impact households identified as *elderly households, households living in rural areas, households containing a disabled member, homeless households, non-English speaking households, or households living on a reservation* may require additional information on the impact of the change on the participation of these households. The nature of the change and its potential impact would dictate how this information would need to be reported.
- *Impact of certain major changes on customer service.* Some major changes may require specific information that is not typically available from an automated system.
 - For example, if a county implements a major change that allows (or requires) households to report changes in their individual circumstances through a change center or allows applicants to apply or reapply for CalFresh through the use of a call center, the following data may be required:
 - The total number of calls made to the center;
 - The average time a caller must wait to talk to a worker (includes hold times and transfers)

- Based upon the call center standards and negotiation with FNS, the percentage of calls with excessive wait times;
- The percentage of calls abandoned by callers prior to and after being answered by the call center;
- The total number of calls dropped by the call center system and the number of callers that received a busy signal; and
- Customer satisfaction (based upon survey results).

As required, the CWD shall submit reports containing monthly data on a quarterly basis. As practicable, and based upon consultation with CDSS and the county, the FNS may require any additional information be reported only for the quarter prior to implementation of the major change.

The CWD shall submit reports for one year after the major change is fully in place. The CDSS, with approval from FNS, may extend this timeframe as it deems necessary.

All initial communication regarding the major change will take place between the CWD and CDSS. The CDSS will act as a liaison between the CWD and FNS and, as necessary, will engage the CWD in direct communication with FNS.

Corrective Action

If the data or other information a CWD submits regarding the major change indicates an adverse impact on program integrity or access, CDSS will work with the CWD to correct the cause of the problem and will provide relevant technical assistance. The FNS may require the CWD to provide additional information as it deems appropriate. Depending upon the severity of the problem, FNS may also require a formal corrective action plan.

Failure to Report

If CDSS becomes aware that a CWD appears to be implementing a major change that has not been formally reported to CDSS, CDSS will work with the CWD to immediately report the change to FNS, and if applicable, proceed as required by this letter. A CWD that fails to comply with reporting requirements may be subject to the FNS suspension or disallowance of Federal Financial Participation administrative funds.

Reporting Other Changes

In addition to the requirement to report a major change in CalFresh operations, CWDs are highly encouraged, as a best practice, to report other changes in operations that do not meet the major change threshold. These include, but are not limited to, temporary office closures and subsequent reopenings, including those caused by an emergency situation or a power outage lasting 4 hours or more, impacts to service delivery as a result of a pandemic, such as Coronavirus Disease 2019, implementation of pilot projects, and changes in the administrative structure of the CWD.

Additionally, CWDs may be required to report changes resulting from state-mandated pandemic responses, including Coronavirus Disease 2019. These changes include, but are not limited to:

- Providing narratives on the effects of changes resulting from state-mandated pandemic responses;
- Providing narrative reports, at a specified frequency, quantifying the effects of changes resulting from state-mandated pandemic responses; or
- Any additional narrative reports evaluating changes resulting from a state-mandated pandemic response. The CDSS will notify the impacted counties of the information required and the method to report the information.

These changes may be reported by sending an email to the CalFresh Technical Assistance and Evaluation Section, CWDCalFreshEvaluations@dss.ca.gov. These change reports do not require submission of a form and may be completed via email.

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

Sincerely,

Original Document Signed By:

Jennifer Hernandez
Deputy Director
Family Engagement and Empowerment Division

Attachments

Attachment A



Food and Nutrition Service

State Agency Notification of Major Changes

STATE AGENCY NOTIFICATION OF MAJOR CHANGES IN PROGRAM DESIGN

Instructions

This form is to be used by State agencies administering the Supplemental Nutrition Assistance Program (SNAP) to notify the United States Department of Agriculture (USDA) Food and Nutrition Service (FNS) of major changes in State agency operations of SNAP as required in 7 CFR 272.15.

For each of the questions in this form, please type all answers directly into the form. Please also pay close attention to the information requested in each question, in order to ensure that you are answering each question fully and accurately.

Notification Deadline

State agencies must notify FNS when major changes have been approved by the appropriate State authority but no less than **120 days** prior to beginning implementation of the change or entering into a contract. If the State is unable to meet the 120 day deadline, they must notify FNS as soon as they are aware of the change and explain why they could not meet the deadline.

Submission Instructions

E-mail completed forms to SNAPMajorChange@fns.usda.gov with a copy to your FNS Regional Office.

Questions

E-mail questions about this form to SNAPMajorChange@fns.usda.gov with a copy to your FNS Regional Office.

STATE AGENCY NOTIFICATION OF MAJOR CHANGES IN PROGRAM DESIGN

A. Summary of Change

- *Please identify the major change being made to the Supplemental Nutrition Assistance Program (SNAP) as described in CFR 272.15(a)(2).*
- *Anticipated Implementation Date of Change: Click here to select.*
- *State: Click here to select.*
- *Region: Click here to select.*

B. Description of Major Change in SNAP and its Expected Impact

- *Please provide the required information below describing the change and/or its expected impact.*
 1. Description:
 - *Please fully describe the change being made to SNAP and what it is intended to accomplish.*
 2. Consultation or Public Comment about Planned Change:
 - *Describe any consultation with stakeholders, advocacy groups or public comment obtained regarding the planned change.*
 3. Scope of Change:
 - *Please indicate whether the change will be Statewide. If the change will not be Statewide, please identify the jurisdictions to which the change will apply.*
 4. Implementation Schedule:
 - *Describe the schedule for implementation, including how the change will be tested, and whether it will be piloted.*
 5. Effect on Applicants and/or Participants:
 - *Explain how the major change is expected to affect applicants and/or participants and how they will be informed of the change.*
 6. Effect on Caseworkers:
 - *Describe how the change will affect caseworkers, and how the State will train caseworkers on the major change.*
 7. Administrative Cost:
 - *Provide the expected administrative cost of the major change in the year it is implemented, and in subsequent years.*

8. Monitoring:

- Explain how the impact of the major change will be monitored during implementation, and after implementation.

9. Impact(s) of the Change on State Automated SNAP System(s):

- Explain how the major change will affect operation of the State automated SNAP system(s).

10. Backup Plans:

- *Please describe any backup plans the State has if the major change creates significant problems in one or more of the program measures discussed in CFR 272.15(a)(3)(ii).*

11. Impact(s) of the Change on Error Rates:

- *Explain the anticipated impact(s) of the change on the State's payment error rate and on the State's negative error rate (CAPER).*
- *Describe the methodology used to determine the projected impact(s).*

12. Impact(s) of the Change on Program Access:

- *Explain the anticipated impact(s) of the change on access to SNAP, including the impact on applicants filing initial applications and recertification applications*

13. Impact(s) of the Change on Application Processing Timeliness and on Timeliness of Recertification Actions:

- *Explain the anticipated impact(s) of the change on application processing timeliness (including both the households entitled to 7-day expedited service and those subject to the 30-day processing standards) and on timeliness of recertification actions.*
- *Describe the methodology used to determine the projected impact(s).*

14. Impact(s) of the Change on Vulnerable Populations:

- *Explain the anticipated impact(s) of the change on obtaining SNAP information, filing an initial application, providing verification, being interviewed, reporting changes, or reapplying, as it would affect any of the following vulnerable populations: elderly households, households in rural areas, households containing a disabled individual, homeless households, non-English speaking households, and/or households living on an Indian reservation.*
- *Describe the methodology used to determine the projected impact(s).*
- *Describe the procedures the State will put in place to minimize the burdens on any of the above-defined vulnerable populations.*

15. Impact(s) of the Change on Customer Service:

- *Explain the anticipated impact(s) of the change on customer service (including the time it takes for a household to contact the State, be interviewed, report changes, and any other parameter defined by the State agency).*
- *Describe the methodology used to determine the projected impact(s)*

16. Additional Information:

- *Provide any additional information of which the State wishes to make FNS aware.*

Signature of requesting official:

Print Name: Click here to enter text.

Title: Click here to enter text.

State Agency Contact

Name: Click here to enter name.

E-mail Address: Click here to enter e-mail address.

Telephone Number: Click here to enter telephone number.



United States Department of Agriculture
Food and Nutrition Service
Western Region

February 11, 2016

Reply to
Attn. of:

Administrative Notice 16-07

Subject:

Supplemental Nutrition Assistance Program – Review of Major
Changes in Program Design and Management Evaluation Systems Final Rule

To:

State SNAP Directors

The final rule, Supplemental Nutrition Assistance Program Review of Major Changes in Program Design and Management Evaluation Systems (Major Changes Rule) was published in the Federal Register on January 19, 2016. State agencies have until March 21, 2016 (60 days from date of publication) to be in compliance with the major changes regulatory provisions at 7 CFR 272.15. Changes to the definitions of project areas that impact the requirements for State Management Evaluations (MEs) are effective October 1, 2016.

This memorandum provides a brief summary describing the rule's provisions and outlines the next steps in its implementation.

More detailed guidance, including Qs & As, and instructions on notifying the Food and Nutrition Service (FNS) of major changes will be issued following this notification.

Definitions

Revised Definition of Project Areas - 7 CFR 271.2 (a)-(c)

The provision revises the definition of large, medium and small project areas for the purposes of selecting sites for MEs.

- Large project area caseload is more than 25,000
- Medium project area caseload is between 5,000 to 25,000
- Small project area caseload is now fewer than 4,999

Major Changes in Program Design

State's Reporting of Major Changes- 7 CFR 272.15(a)

This provision implements the requirement for States to notify FNS when they decide to make a major change in their operation of SNAP. States must notify FNS when changes have been approved by the appropriate State authority but no less than 120 days prior to beginning implementation of the change or entering into a contract. If the State is unable to meet the 120 day deadline, they must notify FNS as soon as they are aware of the change and explain why they could not meet the deadline.

While this provision does not require FNS to approve the reported change in order for the State to proceed with implementation, States are still required to follow the Advance Planning Document process specified in 7 CFR 277.18 if applicable.

All major change notifications must be submitted electronically to the FNS National Office with an analysis of the expected impact of the change as specified in 7 CFR 272.15(a)(3) (see below). States are encouraged to copy their FNS Regional Office. As mentioned above, the format for notifying FNS of a major change and analyzing its projected impacts will be provided in additional guidance that will follow.

Major Changes - 7 CFR 272.15(a)(2)

The following is a summary of the major changes defined in this provision:

- Closure of any local office that performs major functions for 750 or more SNAP households or five percent of the State's total SNAP monthly caseload, whichever is less, and there is not another office available to serve the affected households within 35 miles.
- Substantial increased reliance on automated systems for the performance of responsibilities previously performed by State merit system personnel (as described in Section 11(e)(6)(B) of The Food and Nutrition Act of 2008, as amended) or changes in the way that applicants and participants interact with the State's SNAP agency. This includes the replacement of the State's automated systems used in the certification process, adding functionality to the existing automated systems used in the certification process, or changes in the way applicants and participants interact with SNAP.
- Changes in operations that potentially increase the difficulty of households reporting required information. This could include implementation of a call center or internet web portal for change reporting, a major modification to forms that households use to report changes or the discontinuation of an existing avenue for reporting changes.
- Any reduction or change of the functions or responsibilities currently assigned to SNAP merit system personnel.
- A decrease of more than five percent in the total number of merit system personnel involved in the SNAP certification process in the State from 1 year to the next. In addition, a decrease of more than eight percent in the total number of merit system personnel involved in the SNAP certification process in the State over a 2 year period would be a major change.
- Other major changes identified by FNS

State Analysis on Impact of Change - 7 CFR 272.15(a)(3)

When States initially report a major change to FNS, the report must be accompanied by a description of the change and an analysis of its anticipated impacts of program performance. The description shall include information related to the change's scheduled implementation, if the change is State-wide, what the change is intended to accomplish, and answers to specific questions outlined in 7 CFR 272.15(a)(3)(i). The analysis must include an evaluation of the impact of the change as it relates to key performance metrics such as payment error, negative error, timeliness and program access/customer service.

FNS Action on State's Reports - 7 CFR 272.15(b)

These provisions require FNS to evaluate the reported change to determine if it is indeed a major change and what additional information, beyond the required reporting elements, will be needed. This will initially be done at the FNS National Office in consultation with the appropriate Regional Offices. These provisions also set forth the ongoing required reporting elements that apply to all major changes. The reports are to be submitted quarterly, with data broken out on a monthly basis.

Performance Reporting System

Sub-Units, Review Process, and Corrective Action Planning Changes- 7 CFR 275.7(a), 275.9(b), and 275.16(b)

These sections are revised to eliminate references to issuance offices and requirements for coupon issuance and insert a reference to the implementation of major changes as a possible deficiency requiring corrective action planning.

Next Steps

FNS will issue more detailed guidance and Qs & As on the Major Changes Rule. In addition. If you have any questions concerning this memorandum, please contact your point of contact Team Leader.

Sincerely,

A handwritten signature in cursive script, appearing to read "Walter Zaumseil".

Walter Zaumseil

Policy and Integrity Team Leader Supplemental Nutrition Assistance Program Western Region



United States Department of Agriculture

Food and Nutrition Service

Western Region

February 11, 2016

Reply to
Attn. of:

Administrative Notice 16-10

Subject:

Supplemental Nutrition Assistance Program – Review of Major
Changes in Program Design and Management Evaluation Systems Final Rule, Additional Guidance
and Questions & Answers

To:

State SNAP Directors

This memorandum provides additional implementation guidance and, questions and answers regarding the Food and Nutrition Service's (FNS) final rule titled Supplemental Nutrition Assistance Program (SNAP) Review of Major Changes in Program Design and Management Evaluations (Major Changes Rule) published in the Federal Register on January 19, 2016.

As indicated in FNS' January 19, 2016, Implementation Memorandum for the Major Changes Rule, this guidance provides instructions on how State agencies must notify FNS of major changes and provides a list of questions and answers. The attached questions and answers serve as formal guidance for use by State agencies as they implement provisions of the Major Changes Rule.

As a reminder, State agencies have until March 21, 2016, to be in compliance with the major changes regulatory provisions at 7 CFR 272.15. Changes to the definitions of project areas that impact the requirements for State Management Evaluations (MEs) are effective October 1, 2016.

When State Agencies Must Report a Major Change

7 CFR 272.1 S(a)(1) requires State agencies to notify FNS no less than 120 days prior to beginning implementation of a major change, as defined in

272.15(a)(2)(i)-(vi), or entering into contractual obligations to implement any proposed major changes. If the State agency is unable to meet the 120 day deadline, the State agency must notify FNS as soon as they are aware of the major change and explain why they could not meet the deadline.

Please refer to the attached Questions and Answers for additional policy clarifications related to the notification requirements of the Major Changes Rule.

How State Agencies Must Report Major Changes

State agencies must report major changes to the FNS National Office by emailing a completed *State Agency Notification of Major Changes in Program Design*

form (attached) to SNAPMajorChange@fns.usda.gov. State agencies are encouraged to copy their FNS Regional Office when emailing their completed form to the FNS National Office.

The attached State notification form requests the information and analysis State agencies are required to provide FNS when initially reporting a major change as defined in 7 CFR 272.15(a)(3).

If further questions related to the implementation of the Major Changes Rule arise, please email the FNS National Office at SNAPMajorChange@fns.usda.gov or contact your point of contact Team Leader.

Sincerely,

A handwritten signature in cursive script, reading "Walter Zaumseil".

Walter Zaumseil

Policy and Integrity Team Leader Supplemental Nutrition Assistance Program Western Region