

July 25, 2025

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

EXECUTIVE SUMMARY

ALL COUNTY LETTER NO. 21-101E

The purpose of this errata is to revise the language and attachment in All County Letter 21-101 regarding Mid-Period Actions.



JENNIFER TROIA
DIRECTOR

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DEPARTMENT OF SOCIAL SERVICES
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GAVIN NEWSOM
GOVERNOR

July 25, 2025

ALL COUNTY LETTER NO. 21-101E

TO: ALL COUNTY WELFARE DIRECTORS
ALL CALFRESH PROGRAM SPECIALISTS
ALL CALWORKS PROGRAM SPECIALISTS
ALL IHSS PROGRAM SPECIALISTS
ALL QUALITY CONTROL COORDINATORS
ALL CONSORTIA REPRESENTATIVES

SUBJECT: ERRATA TO ALL COUNTY LETTER NO. 21-101 CALFRESH MID-
PERIOD ACTIONS

REFERENCE: [7 CODE OF FEDERAL REGULATIONS \(CFR\) 273.12\(c\)\(1\)\(i\) AND \(ii\); 7 CFR 273.2\(f\)\(8\)\(ii\); 7 CFR 273.2\(g\)\(1\); 7 CFR 273.2\(i\)\(3\); ALL COUNTY LETTER NO. 21-101; ACL 19-33; ACL 15-94; ACL 18-20; ACL 24-29 AND ACL 24-29E](#)

The purpose of this errata is to revise [All County Letter \(ACL\) No. 21-101](#), released October 15, 2021, regarding CalFresh mid-period actions. These revisions are due to recent policy clarification provided by the United States Department of Agriculture (USDA), Food and Nutrition Service (FNS).

The original and revised language for the impacted sections is provided below. Deletions are contained within brackets and marked with a ~~strike through~~ and additions are contained within braces and in **{bold}**.

Attached to this letter is a fully revised version of the guidance incorporating the changes highlighted in this letter, including the revised CalFresh Mid-Period Report Action Guide.

Waiver Reminder

The following revision is intended to remind the CWD that the state may be operating under a waiver of federal regulations, as approved by USDA, FNS, that impacts mid-period actions. As such, current waivers must be taken into consideration when implementing the guidance provided via ACL No. 21-101.

The original language on page one reads:

This All County Letter (ACL) provides guidance regarding County Welfare Department (CWD) action on information received during the certification period for CalFresh under simplified reporting rules and California's Semi-Annual Reporting (SAR) system. The term "mid-period action" refers solely to required CWD action on information received during the certification period. This guidance does not apply to information received at initial certification, periodic report (i.e., SAR 7), or recertification. This ACL supersedes all prior policy guidance regarding CWD action on information received during the certification period. This newly issued guidance will refer to "during the certification period" as "mid-period".

The revised language reads:

This All County Letter (ACL) provides guidance regarding County Welfare Department (CWD) action on information received during the certification period for CalFresh under simplified reporting rules and California's Semi-Annual Reporting (SAR) system. The term "mid-period action" refers solely to required CWD action on information received during the certification period. This guidance does not apply to information received at initial certification, periodic report (i.e., SAR 7), or recertification. This ACL supersedes all prior policy guidance regarding CWD action on information received during the certification period. **{That said, when implementing this guidance CWDs must also consider current waivers which may impact policy related to mid-period actions and are not reflected in the guidance as they are only available based on USDA, FNS approval.}** This newly issued guidance will refer to "during the certification period" as "mid-period".

Timing of an Increase in Benefits as a Result of a Reported Change

The following revision is intended to provide the CWD with new guidance regarding when a benefit increase or supplement must be issued because of a voluntarily mid-period reported change. This revision aligns with guidance provided by USDA, FNS and ensures that CalFresh households receive all of the benefits they are eligible for.

The original language on page four under “Acting on voluntary mid-period reports” reads:

Under [7 CFR 273.12\(c\)\(1\)\(i\)](#), when a reported change will result in an increase in the household’s benefits, the change must be effective no later than the first allotment issued 10 days after the date the change was reported. For example, a \$40 decrease in income reported on October 15 would increase the household’s monthly benefit allotment for the November benefit month because the change must take effect no later than October 25 (10 days after the change is reported) and the next monthly benefit allotment would be the November benefit month. If the same decrease in income were reported on October 28, and it is too late in the month to make the change to the household’s monthly benefit allotment for the November benefit month, the change must be effective no later than the December benefit month. As a result, no supplements are issued.

The revised language reads:

Under [7 CFR 273.12\(c\)\(1\)\(i\)](#), when a reported change will result in an **increase** in the household’s benefits, the change must be effective no later than the first allotment issued 10 days after the date the change was reported. **{The CWD must act on the reported change effective the month after the report is made, regardless of the report date in the preceding month. The CWD must issue the increased benefits by the household’s next monthly benefit allotment date, or no later than the 10th day of the following month in which the report was made}.** For example, a \$40 decrease in income reported on October 15 would increase the household’s monthly benefit allotment for the November benefit month ~~[because the change must take effect no later than October 25 (10 days after the change is reported) and the next monthly benefit allotment would be the November benefit month].~~ If the same decrease in income were reported on October 28, and it is too late in the month to make the change to the household’s monthly benefit allotment~~[for the November benefit month.]~~ **{because the household’s monthly benefit allotment takes effect early November (e.g., November 1), the household will receive their monthly benefit allotment on November 1. The CWD must then issue a supplemental benefit by November 10.}** ~~[the change must be effective no later than the December benefit month. As a result, no supplements are issued.]~~

Issuing a Supplement as a Result of a Reported Change

The following revision is intended to provide the CWD with new guidance regarding when a supplement must be issued because of a voluntarily mid-period reported change. This revision aligns with guidance provided by USDA, FNS and ensures that CalFresh households receive all the benefits they are eligible for.

The original language on page four under “Acting on voluntary mid-period reports” reads:

Under [7 CFR 273.12\(c\)\(1\)\(ii\)](#), there are only two situations when the CWD is required to issue a supplement when a change is reported too late in the month to increase the household’s next monthly benefit allotment: 1) when there is an increase in a household’s benefits due to the addition of a new household member who is not a member of another certified household; or 2) when there is a decrease of \$50 or more in the household’s gross monthly income. When a supplement is required, the county must issue the supplement no later than the 10th day of the following month. For example, if the household reports a \$60 decrease in income on October 28, and the household’s monthly benefit allotment takes effect on November 1, the household would receive their monthly benefit allotment on November 1 and the CWD must issue a supplement to November benefits by November 10.

The revised language reads:

Under [7 CFR 273.12\(c\)\(1\)\(ii\)](#), there are only two situations when the CWD is required to issue a supplement when a change is reported too late in the month to increase the household’s next monthly benefit allotment: 1) when there is an increase in a household’s benefits due to the addition of a new household member who is not a member of another certified household; or 2) when there is a decrease of \$50 or more in the household’s gross monthly income. **{However, States have flexibility to issue supplements for other reported changes that result in an increase in benefits. The CDSS is requiring CWDs to act on the reported change effective the month after the report is made, regardless of the report date in the preceding month. The CWD must issue the increased benefits by the household’s next monthly benefit allotment date, or no later than the 10th day of the following month in which the report was made}** ~~[When a supplement is required, the county must issue the supplement no later than the 10th day of the following month]~~. For example, if the household reports a ~~[\$60]~~ decrease in income on October 28, and the household’s monthly benefit allotment takes effect on November 1, the household would receive their monthly benefit allotment on November 1 and the CWD must issue a supplement to November benefits by November 10.

{Supplements must not be provided for the report month or months prior to the report month. For example, a household receives their monthly benefit allotment on the 1st of the month. The household’s income decreases August 1, but the household does not report it to the CWD until October 28. The CWD must not issue a supplement for August, September, or October. The increase in benefits or supplement is effective in November.}

Timeline for Acting on a Reported Change

The following revision is intended to align with other revisions outlined above per guidance provided by USDA, FNS regarding when a benefit increase or supplement must be issued because of a voluntarily mid-period reported change.

The original language on page four under “Acting on voluntary mid-period reports” reads:

In cases where the CWD requires verification to act on the change that would result in an increase in benefits, the CWD must inform the household in writing of the additional verification requirements and that failure to provide the verification within the specified date will result in no change to benefits. If the household fails to provide the required verification within 10 days of the change being reported but provides the verification at a later date, then the timeframe for taking action on changes must run from the date verification is provided rather than from the date the change was reported. Once the household provides the required verification, the CWD must issue the benefit increase no later than the first allotment issued 10 days after the date the verification was provided.

The revised language reads:

In cases where the CWD requires verification to act on the change that would result in an increase in benefits, the CWD must inform the household in writing of the additional verification requirements and that failure to provide the verification within the specified date will result in no change to benefits. If the household fails to provide the required verification within 10 days of the change being reported but provides the verification at a later date, then the timeframe for taking action on changes must run from the date verification is provided rather than from the date the change was reported. Once the household provides the required verification, the CWD must issue the benefit increase ~~[no later than the first allotment issued 10 days after the date the verification was provided]~~ **{no later than the 10th day of the following month in which the verification was received}**.

When to Verify a Change in Income

The following revision is intended to correct guidance on when the CWD must require verification of an income change over \$50, regardless of whether the income source changed. As a reminder, this policy is specific to simplified mid-period rules and action on voluntary mid-period reports.

The original language on page five under “Acting on voluntary mid-period reports” reads:

Following federal regulations at [7 CFR 273.2\(f\)\(8\)\(ii\)](#), the CWD must not verify changes in income if the income source has not changed and if the amount has changed by \$50 or less, unless the information is incomplete, inaccurate, inconsistent or outdated (older than 60 days). Since CWDs must only act on information that results in an increase to the household's benefits, unless otherwise specified, the CWD must only require verification of an income change if it is over \$50, the income source has changed, and the change would result in an increase to the household's benefits.

The revised language reads:

Following federal regulations at [7 CFR 273.2\(f\)\(8\)\(ii\)](#), the CWD must not verify changes in income if the income source has not changed and if the amount has changed by \$50 or less, unless the information is incomplete, inaccurate, inconsistent or outdated (older than 60 days). Since CWDs must only act on **{voluntary mid-period}** information that results in **{no change or}** an increase to the household's benefits, unless otherwise specified, the CWD must only require verification of an income change if it is over \$50[, ~~the income source has changed,~~] and the change would result in an increase to the household's benefits**{, or the income change is \$50 or less and the income source has changed}**.

Information Considered Actionable Mid-Period

The following revision is intended to include an item to the list of mid-period information that the CWD must act on mid-period regardless of an increase or decrease in benefits.

The original language on page eight under "Mid-Period Action Overview" reads:

9. Verified Nationwide Prisoner Match (NPM) or Deceased Persons Match (DPM). Refer to ACL 19-33 issued on April 16, 2019, for guidance on NPMs and DPMs.

10. Information that is considered VUR (see page eight of this letter for VUR details). Information considered VUR is limited to the following:

The revised language reads:

9. Verified Nationwide Prisoner Match (NPM) or Deceased Persons Match (DPM). Refer to ACL 19-33 issued on April 16, 2019, for guidance on NPMs and DPMs.

{10. Household failure or refusal to provide the CWD with mid-period verification of questionable information.

Failure or refusal to provide the CWD with verification or information for deductions that are deemed/considered questionable, such as dependent care,

medical expense, shelter cost, child support paid will result in the household's benefits being recalculated without the deduction.}

[40-] **{11.}** Information that is considered VUR (see page eight of this letter for VUR details). Information considered VUR is limited to the following:

Correction to the VUR list items and Clarification Regarding Voluntary Mid-Period Reports and Voluntarily Submitted Verification

The following revisions are intended to correct the VUR list to remove "Information Known to Agency". This revision aligns with guidance provided by USDA, FNS in that simplified reporting States cannot act on all information considered "Information Known to Agency" without an approved FNS waiver.

Additionally, revisions within this section provide clarification on CWD action when the household voluntarily reports information or verification mid-period.

The original language on page eight under "Mid-Period Action Overview" reads:

- i. Information that is reported to and verified by a PA program which triggers action in the PA program, otherwise known as "Information Known to the Agency".

Such information is considered reported and verified on the date the PA program processes the change. See page 11 of this letter for details on "Information Known to the Agency".

- j. Information regarding non-citizen status obtained from the Systemic Alien Verification for Entitlements (SAVE) system.
- k. Information regarding In-Home Supportive Services provider wages obtained from the Case Management Information and Payrolling System.
- l. Information regarding the removal of a child from a CalFresh household obtained from Child Protective Services and/or the county Foster Care system.
- m. Information that a household member received substantial lottery or gambling winnings obtained from a gaming entity data match.

Any other changes reported mid-period that would result in a decrease or no change in the household's benefits, the CWD must not request verification and must document the voluntarily reported information, including any verification submitted voluntarily, in the case record.

The revised language reads:

- i. ~~[Information that is reported to and verified by a PA program which triggers action in the PA program, otherwise known as “Information Known to the Agency”.~~

~~Such information is considered reported and verified on the date the [PA] program processes the change. See page 11 of this letter for details on “Information Known to the Agency”.]~~

- i. Information regarding non-citizen status obtained from the Systemic Alien Verification for Entitlements (SAVE) system.
- j. Information regarding In-Home Supportive Services provider wages obtained from the Case Management Information and Payrolling System.
- k. Information regarding the removal of a child from a CalFresh household obtained from Child Protective Services and/or the county Foster Care system.
- l. Information that a household member received substantial lottery or gambling winnings obtained from a gaming entity data match.

{For voluntary household mid-period reports, the CWD must only act if the reported information and/or verification is VUR, or the information would result in an increase. Additionally, the CWD must only act on third-party information if the information is considered VUR.} Any other changes reported mid-period that would result in a decrease or no change in the household’s benefits, the CWD must not request verification and must document the voluntarily reported information, including any verification submitted voluntarily, in the case record. **{Even if the household voluntarily submitted verification for a reported change that would result in a decrease or no change, the CWD must not act. The CWD must document the voluntarily reported verification in the case record and follow up at the household’s next SAR 7 or recertification, whichever comes first.}**

Clarification Regarding VUR information

The following revisions are intended to provide clarification on CWD action when receiving mid-period VUR information.

The original language on page eight under “Verified Upon Receipt” reads:

When the CWD receives information about a household’s circumstances that is considered VUR, the information requires mid-period action with no further verification,

regardless of the impact on benefits. “Verified upon receipt” is a term given to a state-prescribed list of specific information that comes directly from the source of information and is free from question. It is important to remember that information cannot become VUR just because additional verification has been provided to the CWD.

Information considered VUR may become known to the county through a voluntary report, mandatory report, electronic source, or any other means. California’s prescribed list of information that is considered VUR is provided beginning on page six of this letter, item 10 including subpoints a through n.

The revised language reads:

When the CWD receives information about a household’s circumstances that is considered VUR, the information requires mid-period action with no further verification, regardless of the impact on benefits. “Verified upon receipt” is a term given to a state-prescribed list of specific information that comes directly from the source of information and is free from question. It is important to remember that information cannot become VUR just because additional verification has been provided to the CWD. **{For example, if the household reports an income increase (under IRT) over the telephone and then sends the county their paystubs, the information does not become VUR. In this case, the CWD would send a No-Change NOA to the household and follow-up at the household’s next SAR 7 or recertification, whichever comes first.}**

Information considered VUR may or may not ultimately result in CWD mid-period action. Additionally, CWD action may include sending the household a No-Change NOA and not acting until the household’s next SAR 7 or recertification, whichever comes first.}

Information considered VUR may become known to the county through a voluntary report, mandatory report, electronic source, or any other means. California’s prescribed list of information that is considered VUR is provided beginning on page six of this letter, item 10 including subpoints a through [A] **{I}**.

Clarification Regarding Significantly Conflicting Information

The following revision is intended to provide the CWD clarification regarding the definition of “Significantly Conflicting Information” per USDA, FNS guidance.

The original language on page 10 under the “Unclear Information” section reads:

As outlined in [ACL 18-20](#), the CWD must follow-up on unclear information if the information:

1. Is less than 60 days old relative to the current month of participation; and
2. Was required to have been reported based on the reporting system to which the household was assigned (in California, all CalFresh households are assigned to SAR.)

The updated procedures also require CWDs to follow-up if the unclear information appears to present significantly conflicting information about household circumstances from that used by the CWD at initial certification or recertification.

If a CWD receives unclear information about a household outside of the periodic report that is less than 60 days old relative to the current month of participation and, if accurate, must be reported, the CWD must send a request for verification using the *Request for Verification* (CW 2200) form.

The revised language reads:

As outlined in [ACL 18-20](#), the CWD must follow-up on unclear information if the information:

1. Is less than 60 days old relative to the current month of participation; and
2. Was required to have been reported based on the reporting system to which the household was assigned (in California, all CalFresh households are assigned to SAR.)

The updated procedures also require CWDs to follow-up if the unclear information appears to present significantly conflicting information about household circumstances from that used by the CWD at initial certification or recertification. **{Please note that “significantly conflicting information” applies only to information received mid-period about the information the household provided to the CWD at the time of initial certification or recertification, under normal processing and expedited service standards [7 CFR 273.2(g)(1) and 7 CFR 273.2(i)(3)]. For example, if a household is certified with no earned income and the state obtains information from a third-party source four (4) months into the certification period indicating that the household had earned income of \$1000 during the month used for initial certification, then this information would be significantly conflicting, and the CWD would need to send a [Request for Verification \(CW 2200\)](#) to the household. If the household does not respond, the CWD must discontinue the case due to failure to respond.}**

If a CWD receives unclear information about a household outside of the periodic report that is less than 60 days old relative to the current month of participation and, if

accurate, must be reported, the CWD must send a request for verification using the ~~[Request for Verification (CW 2200)]~~ **{CW 2200}** form.

Clarification Regarding “Information Known to the Agency”

The following revision is intended to provide the CWD clarification regarding “Information Known to Agency”. This revision aligns with USDA, FNS guidance.

The original language on page 11 under the “Information Known to the Agency” section reads:

The federal definition of “state agency” requires that, for SNAP purposes, the state agency must include the organizational entity responsible for administering TANF and other assistance programs, including medical assistance programs. The CWDs in California have integrated the operation of CalFresh, CalWORKs, and Medi-Cal programs. That said, because California has opted to act only on certain changes, the CWD does not need to act if the household reports a change for the other program in which it is participating, and the change does not result in a change for that other program, and would result in a decrease to the household’s CalFresh benefits. A “change for the other program” for this purpose refers to information which results in a change in benefits or eligibility.

An example of Information Known to the Agency includes a household reporting an address change to CalWORKs. In this case, because the reported change caused an action for CalWORKs and impacts CalFresh the CWD must act for CalFresh and follow all mid-period address change rules. However, if a Welfare-To-Work CalWORKs recipient provides income information for Welfare-To-Work purposes but the income information does not cause a change in their CalWORKs benefit amount, and CalWORKs eligibility and benefits stay the same, then the CWD must not act for CalFresh.

The revised language reads:

The federal definition of “state agency” requires that, for SNAP purposes, the state agency must include the organizational entity responsible for administering TANF and other assistance programs, including medical assistance programs. The CWDs in California have integrated the operation of CalFresh, CalWORKs, and Medi-Cal programs. That said, because California has opted to act only on certain changes, the CWD does not need to act **{for CalFresh}** if the household reports a change for the other program in which it is participating, and the **{reported}** change does not result in a change for that other program, ~~[and]~~ **{but}** would result in a decrease to the household’s CalFresh benefits. ~~[A “change for the other program” for this purpose]~~ **{“Information Known to the Agency”}** refers to information **{reported to and acted on by the**

CalWORKs and/or Medi-Cal programs} which results in a change in benefits or eligibility} {CalFresh benefit increase or a change that would impact the CalFresh case without decreasing benefits}.

An example of Information Known to the Agency includes a household reporting an address change to CalWORKs. In this case, because the reported change caused an action for CalWORKs and impacts CalFresh the CWD must act for CalFresh and follow all mid-period address change rules. However, if a Welfare-To-Work CalWORKs recipient provides income information for Welfare-To-Work purposes but the income information does not cause a change in their CalWORKs benefit amount, and CalWORKs eligibility and benefits stay the same, then the **{information is not considered “Information Known to Agency” and the}** CWD must not act for CalFresh.

If you have any questions regarding this letter, please contact the CalFresh Policy Bureau at CalFreshPolicy@dss.ca.gov.

Sincerely,

Original Document Signed By

ALEXIS FERNÁNDEZ GARCIA
Deputy Director
Family Engagement and Empowerment Division

Attachments

ATTACHMENT A

All County Letter (ACL) No. 21-101E Appendix CalFresh Mid Period Report Action Guide

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)?
ABAWD Reduction in Work Hours	Mandatory	ABAWDs <i>who are subject to the time limit</i> are required to report, within 10 days, when work hours drop below 20 per week, or 80 hours averaged monthly.	Determine if the individual qualifies for an ABAWD exemption, meets good cause criteria, is eligible to receive an additional three consecutive months of eligibility, or can receive a percentage exemption. If none of these apply, determine if individual has any remaining months in their three countable months of benefits within the 36-month period. If not, discontinue benefits at the end of the month in which timely and adequate notice can be provided.	No	No
Address Change: Report of change in residence	Voluntary	Household voluntarily reports an address change {or a Drug Addiction or Alcoholic treatment center (DAA) reports that a household left the DAA.}	Determine the impact on shelter costs. The CWD must not disregard a change in shelter costs related to the address change. This includes a report of a household leaving a drug addiction or alcoholic treatment and rehabilitation center (DAA Treatment Center) made by the DAA Treatment Center using a change report form which includes the household's address change. Refer to ACL No. 19-51 issued on May 23, 2019 for additional guidance. As of September 1, 2019, shelter costs must not be verified, unless questionable. Client statement of	No {Yes}	Yes

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)
			<p>shelter costs is sufficient. Refer to ACL No. 19-86 issued August 21, 2019 for additional guidance.</p> <p>If the household does not provide information about shelter costs when they report the address change, {the CWD may attempt to contact the household via phone to get shelter cost information. If phone attempt(s) are unsuccessful, or if the county does not attempt phone contact, then the CWD must} send a CW 2200 requesting information. If the household fails to provide information within 10 days, {and does not request assistance obtaining the verification, then recalculate benefits without the shelter deduction and} send the household a {timely and adequate} notice {of action.} [that CalFresh benefits will be recalculated without the shelter deduction.]</p> <p>The household may contact the CWD anytime to provide shelter cost information. Once the CWD has received the shelter cost information the CWD must recalculate the household's budget with the shelter deduction {effective the month following the reported change}.</p> <p>Note, as of the publication date of this letter California is under the "Alternate Procedures When Change of Address is Reported" FNS waiver.</p>		

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)
			Refer to ACWDL , issued March 28, 2023, and ACL No. 24-47 , issued June 28, 2024 for additional guidance.)		
Address Change: Returned Mail	N/A	The United States Postal Service (USPS) returns mail to the CWD indicating the household is no longer at address.	<p>If no forwarding address {is provided by USPS}, document the information in the case record and follow-up at the next SAR 7 or recertification, whichever comes first.</p> <p>If there is a forwarding address provided by USPS, whether a sticker or handwritten on the envelope, do not consider an address change unless confirmed by the household{. As a best practice the CWD should contact the household via telephone to confirm the address change. If the household is not reachable, send the household a CW 2200 to the address on file. If the household fails to provide information within 10 days, and does not request assistance obtaining the verification, then recalculate benefits without the shelter deduction and send the household a timely and adequate notice of action.</p> <p>If the household provides the requested information, the CWD must act on the change according to simplified reporting rules.</p> <p>Note, as of the publication date of this letter California is under the “Alternate Procedures When Change</p>	No {Yes, only if forwarding address is provided.}	No

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)
			of Address is Reported” FNS waiver. Refer to ACWDL , issued March 28, 2023, and ACL No. 24-47 , issued June 28, 2024 for additional guidance.}		
{Child Support Exclusion}	{Voluntary}	{Household voluntarily reports legally obligated child support payments (including arrearages) that a household member pays to or for an individual living outside the household. This report may be an update in the amount of child support paid.}	<p>{Legally obligated child support payments are treated as income exclusions. If a household makes a mid-period report of new or updated child support payment, the household must determine impact on benefits, regardless of whether the household provided verification.</p> <p>If the change would result in a decrease in benefits, do not request verification (if not provided) and send the household a No-Change NOA, document the information in the case record, and follow-up at the next SAR 7 or recertification, whichever comes first. Even if the household provided verification along with the reported change, the CWD must not act on the information.</p> <p>If the change would result in an increase in benefits, the CWD must send the household a CW 2200 requesting verification, if applicable, to obtain the information required to act on the change. If the household already provided verification, no need to resend the CW 2200. Once all verification/information is</p>	{Yes}	{No}

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)
			<p>obtained the CWD must act to increase benefits.</p> <p>If the household does not respond to the CW 2200 send the household a No-Change NOA, document the information in the case record and follow-up at the next SAR 7 or recertification, whichever comes first. Refer to ACL 06-31 dated August 16, 2006, for further guidance on the treatment of legally obligated child support income exclusion.}</p>		
County Initiated Mass Change	N/A	County initiated mid-period actions are mass changes or changes that the client does not need to report, such as a {Cost of Living Adjustment (COLA)} or a change in eligibility criteria due to regulatory or legislative action.	Act on all county initiated actions, even if the action results in a decrease or termination of benefits.	No	No

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)
[Household Benefit Increase Due to the Addition of a New Household Member or an Income Decrease of \$50 or More]	[Voluntary]	[Household voluntarily reports a new member in their household or a decrease in the household's income of \$50 or more. Either change may result in an increase in the household's benefit amount.]	<p>[If the benefit increase is due to the addition of a new household member, the CWD must send the household a CW 2200 requesting verification of the new household member's income, if applicable, and any other mandatory verifications required to add the new household member.</p> <p>If the benefit increase is due to an income decrease of \$50 or more, the CWD must send the household a CW 2200 requesting verification of the new income amount, if not already available.</p> <p>If the income decrease led to zero income, a statement from the household that it has zero income is sufficient evidence that a household cannot reasonably anticipate income during the remainder of the certification period, unless questionable. Refer to ACL 20-48 issued on April 22, 2020 for additional guidance.</p> <p>If verification is provided timely, the household must receive the increase in benefits by the household's first monthly benefit allotment occurring 10 days after the date the change was reported. If it is too late in the month to change the household's next monthly benefit allotment, the CWD must provide a supplement to the household, no later than the 10th day of the</p>	[Yes]	[Yes, for the household composition change.]

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)
			<p>following month in which the report was made.</p> <p>If the household does not provide verification timely, send the household a No-Change NOA. If the household provides verification at a later date, then the timeframe for taking action on the change must run from the date verification is provided rather than from the date the change was reported.]</p>		
Household Composition Change {{Clear Information}}	Voluntary	Household voluntarily reports a change in household composition {and provides information and/or verification, regarding a new household member and the CWD can clearly determine impact to the household's benefits}.	<p>If the change would result in a decrease in benefits, [do not request verification of the new household member's income and/or] {do not request} any other mandatory verifications{, if applicable, send the household a No-Change NOA,} and document the information in the case record and follow-up at the next SAR 7 or recertification, whichever comes first. {Even if the household provided verification along with the reported change, the CWD must not act on the information.}</p> <p>If the change would result in an increase in benefits, the CWD must {act to add the new household member.} [send the household a CW 2200 requesting verification of the new household member's income, if applicable, and any other mandatory verifications required to add the new household member.</p>	{No} [Verification of the household composition change itself is not required. However, if applicable, the CWD must request mandatory verifications from the new household member to accurately determine benefits looking forward].	Yes, for the household composition change.

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)
			<p>If the household provides the required verification, the CWD must act on the change appropriately.]</p> <p>If the household does not provide the required verification, the CWD must send a No-Change NOA.]</p>		
{Household Composition Change (Unclear Information)}	{Voluntary}	{Household voluntarily reports a change in household composition and the household did not provide or know the new household member's information/ verification. As a result, the CWD does not know the impact to the household's benefits.}	<p>{The CWD must send the household a CW 2200 requesting necessary information and/or verification to evaluate the impact on the household's benefits.</p> <p>If the household responds to the CW 2200 and provides the required information and/or verification, the CWD must act on the change according to simplified reporting rules. If the change would result in a decrease in benefits, the CWD must not act on the change, send the household a No-Change NOA, and document the information in the case record and follow-up at the next SAR 7 or recertification, whichever comes first. If the change would result in an increase in benefits, the CWD must act to add the new household member.</p> <p>If the household does not provide the required verification, the CWD must send a No-Change NOA and follow-up at the next SAR 7 or recertification, whichever comes first. }</p>	{Yes, because this is considered unclear information .}	{Yes, for the household composition change only.}

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)
{Household Composition Change – Household member removal}	{Voluntary}	{Household voluntarily reports a change in household composition.}	{A voluntary mid-period report of a household composition change is considered VUR. Therefore, unless questionable, the CWD must act on removing the existing household member from the case, regardless of the impact to the household's benefits.}	{No}	{Yes}
IEVS Report {(other than PVS and Lottery Matches)}	N/A	Recipient or Applicant IEVS data match including {but not limited to} , SSA benefit amounts, [death information] {Deceased Persons Match} , UIB benefit amounts [, and SAVE information] .	<p>Recipient IEVS match follow-up must be completed within 45 calendar days of the Department transmitting the match to the county. Refer to ACL No. 17-41 issued on June 6, 2017 for additional guidance.</p> <p>[For all other matches, if] {If} the {IEVS match} information is unclear and meets the criteria for 'unclear information', the CWD must follow the rules for unclear information per guidance in ACL 18-20 issued on February 28, 2018.</p>	[No] {Yes, depending on the type of report.}	Yes, only for certain IEVS report matches {such as SSA benefit amounts} .
{IEVS Receipt of Substantial Lottery}	{N/A}	{CA Lottery Recipient IEVS Match through IEVS Secure Automated File Exchange or SAFE}	{The CWD must review case information to check if lottery winnings have been reported. Case narration can verify substantial winnings. The lottery match is considered VUR, so a client verification letter (GEN 201-R) is not needed before action. If the winnings are unreported and exceed the maximum allowed, the CWD must discontinue the entire household within 45 days of receiving the match. Refer to ACL No. 24-29E	{No}	{Yes}

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)
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			issued September 6, 2024 for additional guidance.}		
Income: Change of \$50 or Less	Voluntary	Household voluntarily reports an income change of \$50 or less.	<p>If the change would result in a decrease in benefits, document the information in the case record {, send the household a No-Change NOA,} and follow-up at the next SAR 7 or recertification, whichever comes first.</p> <p>If the change would result in an increase, the income change is [less than] \$50 {or less}, and the source did not change, the CWD must not request verification and must act on the change to increase benefits. If the income source has changed, the CWD must request verification before acting on the change to increase benefits.</p>	No	No
Income: Change of More Than \$50 but less than household IRT	Voluntary	Household voluntarily reports an income change of more than \$50.	<p>If the change would result in a decrease in benefits, do not request verification, send the household a No-Change NOA, [and] document the information in the case record, and follow-up at the next SAR 7 or recertification, whichever comes first. {Even if the household provided verification along with the reported change, the CWD must not act on the information.}</p> <p>If the change would result in an increase in benefits, the CWD must send the household a CW 2200 requesting verification {, if applicable, to obtain information/verification required to act on the change. If the household already provided</p>	Yes	No

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)
			<p>verification, no need to resend the CW 2200}. If the household provides the required verification {after receiving the CW 2200}, the CWD must act on the change appropriately.</p> <p>If the household does not provide the required verification, {after receiving the CW 2200,} the CWD must send a No-Change NOA {, document the information in the case record and follow-up at the next SAR 7 or recertification, whichever comes first}.</p>		
Income: Uncertain if Over IRT of 130% FPL	Voluntary	Household is uncertain if gross monthly income is over IRT.	<p>Follow-up with the household to determine if gross monthly income received exceeded the IRT. If it hasn't, take no further action. If it has, determine what amount of income is reasonably anticipated to continue.</p> <p>If the household income over the IRT cannot be reasonably anticipated to continue, because the household does not know when to expect the income again, do not act and send the Reporting Changes for Cash Aid and CalFresh (SAR 2) form, reminding the household of its IRT and reporting rules, and a No-Change NOA.</p> <p>If the household income over the IRT can be reasonably anticipated to continue send the household a CW 2200 requesting verification of new income. {A CW 2200 must be sent to</p>	No {Yes, if the CWD needs to verify income over IRT.}	No

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)
			<p>verify income over IRT because the CWD must assess the household's new income and circumstances for continued eligibility with income over 130%. The CWD must not discontinue the household based on a verbal statement of income over IRT.}</p> <p>If the household provides the required verification, the CWD must act on the change appropriately.</p> <p>If verification of the new income {over IRT} is not provided, discontinue the case for failure to provide verification at the end of the month in which timely and adequate notice can be provided.</p> <p>{If the CWD attempts to contact the household and is unsuccessful, then, the CWD must evaluate the information to determine if it meets the unclear information rules in accordance with ACL No. 18-20 issued on February 28, 2018. If yes, follow unclear information procedures. If no, document the attempt to contact the household in the case record and send the household a No-Change NOA.}</p>		
Income: Increase {Over \$50 but} Below 130% FPL	Voluntary	Household reports an increase in gross monthly income below 130% FPL.	If the change would result in a decrease in benefits, do not request verification, send the household a No-Change NOA, and document the information in the case record and follow-up at the next	No	No

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)
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{for households certified at 130% FPL or below}		{Household may have provided verification.}	SAR 7 or recertification, whichever comes first. {Even if the household provided verification along with the reported change, the CWD must not act on the information.}		
Income: Increase Over IRT of 130% FPL (for households certified at 130% FPL or below)	Mandatory Households are required to report, within 10 days, when gross monthly income received exceeds the IRT.	Household reports that gross monthly income received increased over IRT and new income is reasonably anticipated to continue for at least one month beyond the month in which the change is reported.	<p>If the household is under 200% and MCE, request verification of new income {(if applicable)} and redetermine ongoing eligibility. {Once income is verified, [Decrease] {decrease} benefits at the end of the month in which timely and adequate notice can be provided.</p> <p>If the household is non-MCE, {and provided verification of income over IRT,} discontinue at the end of the month in which timely and adequate notice can be provided. {If verification was not provided, request income via a CW 2200.}</p> <p>If verification of the new income is not provided, discontinue the case for failure to provide verification at the end of the month in which timely and adequate notice can be provided.</p>	<p>[No, if household is ineligible and discontinu g-]</p> <p>Yes, [if redeterminin g] {to redetermin e ongoing eligibility.}</p> <p>[Verification is required for purposes of budgeting income prospectivel y-]</p>	No

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)
Income: Increase Over 130% FPL and Over 200% FPL (for households certified with income between 131 and 200% of FPL.)	Voluntary	Household reports that gross monthly income received increased and is over 200% FPL.	<p>This is considered a voluntary report.</p> <p>Households determined eligible with gross monthly income between 131 and 200% FPL do not have an IRT reporting requirement since they have already met their mandatory IRT reporting requirement at application.</p> <p>If the change would result in a decrease in benefits or ineligibility, do not request verification. Send the household a No-Change NOA, and document the information in the case record and follow-up at the next SAR 7 or recertification, whichever comes first. {Even if the household provided verification along with the reported change, the CWD must not act on the information.}</p>	No	No
Income: Increase Over 130% FPL, but at or Below 200% FPL (for households certified with income between 131 and 200% of FPL.)	Voluntary	Household reports that gross monthly income received increased but is below 200% FPL.	<p>This is considered a voluntary report.</p> <p>Households determined eligible with gross monthly income between 131 and 200% FPL do not have an IRT reporting requirement since they have already met their mandatory IRT reporting requirement at application.</p> <p>If the change would result in a decrease in benefits, do not request verification, and send the household a No-Change NOA. Document the information in the case record and follow-up at the next SAR 7 or recertification, whichever comes first. {Even if the household</p>	No	No

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)
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			provided verification along with the reported change, the CWD must not act on the information.}		
{Income: Increase of over 200% FPL for an Elderly and/or Disabled (E/D) Household certified with income between 131 and 200% FPL.}	{Voluntary}	{E/D household certified with income between 131 and 200% FPL reports income over 200%FPL.}	<p>{This is considered a voluntary report.</p> <p>E/D households determined eligible with income between 131 and 200% FPL do not have an IRT reporting requirement since they have already met their mandatory IRT reporting requirement at application.</p> <p>If the change would result in a decrease in benefits, do not request verification, and send the household a No-Change NOA. Document the information in the case record and follow-up at the next SAR 7 or recertification, whichever comes first. Even if the household provided verification along with the reported change, the CWD must not act on the information.}</p>	{No}	{No}
Information Known to the Agency	N/A	“Information Known to the Agency” pertains only to information which caused a change in eligibility or benefits for the CalWORKs and/or Medi-Cal programs. {This does not include	<p>If the information provided for [the other program] {CalWORKs and/or Medi-Cal} does not trigger action in that program, [but would result in a decrease for CalFresh, then the CWD must document the information in the case record and follow up at the next SAR 7 or recertification, whichever comes first. However, if the change would result in an increase in CalFresh benefits, the CWD must send the household a CW 2200 requesting</p>	No	{No} [Yes, if the information provided to the other program triggered action in that other program.]

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)
		PACF changes described in this appendix.}	<p>verification, if applicable, and act on the change appropriately] {then the CWD does not act on the information for CalFresh}.</p> <p>If the household does not provide the required verification, the CWD must send a No-Change NOA].</p> <p>If the information provided [to the other program] does trigger an action [in that other program] {for CalWORKs and/or Medi-Cal and the change would result in an increase in CalFresh benefits}, the CWD must act on the information for CalFresh [, even if it results in a decrease]. {However, if the information the CWD acted on for CalWORKs and/or Medi-Cal would cause a decrease to the CalFresh benefits and the information is not considered VUR or a mandatory mid-period report, then the CWD must not act to decrease the CalFresh benefits. The CWD must send the household a No-Change NOA, document the information in the case record, and follow-up at the next SAR 7 or recertification, whichever comes first.}</p>		
Intentional Program Violation (IPV) Report	N/A	IPV reports provide IPV information for CalFresh and CalWORKs.	Act on information mid-period only if the IPV is confirmed. {A confirmed IPV means that a hearing official found that a household member committed, and intended to commit, an intentional program violation.}	No	Yes

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)
Medical expenses: Reported by the Household	Voluntary	Household makes a voluntary mid-period report of a medical expense that would allow/disallow for a medical deduction.	<p>If the change would result in a decrease in benefits, do not request verification and send the household a No-Change NOA. Document the information in the case record and follow-up at the next SAR 7 or recertification, whichever comes first. {Even if the household provided verification along with the reported change, the CWD must not act on the information.}</p> <p>If the change would result in an increase in benefits, the CWD must send the household a CW 2200 requesting verification, if applicable, [and act on the change appropriately] {to obtain the information required to act on the change. If the household already provided verification, no need to resend the CW 2200. Once all verification/ information is obtained the CWD must act to increase benefits.</p> <p>If the household does not respond to the CW 2200 send the household a No-Change NOA, document the information in the case record and follow-up at the next SAR 7 or recertification, whichever comes first}.</p>	Yes, if applicable.	No
Medical Expenses: Reported by Third Party	Voluntary	A change in medical expenses reported by a source other than	Do not request verification and do not act {unless the third-party report is considered VUR}.	No	[No] {Depends on the type of report.}

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)
		the household mid-period.			
{Out-of-State EBT usage}	{Voluntary}	{The CWD discovers an EBT usage report or other third-party information that a household is accessing their benefits in another state for an extended period of time.}	{The CWD must attempt to contact the household by sending a CW 2200 to the household's last known address to determine if the household has moved to the other state or intends to return. If the household does not respond, the household's benefits must be terminated for failing to respond to the CW 2200. Refer to ACL No. 15-94 issued on November 3, 2015 for additional guidance on CalFresh residency and out-of-state EBT usage.}	{Yes}	{No}
PACF: Grant Change	N/A	A change is reported that results in a change to the household's public assistance {(PA)} benefits, such as CalWORKs {, CAPI, and General Assistance/ General Relief. In certain instances, a PA change may also be a County Initiated Change} .	Act on CalFresh case, even if it results in a decrease in benefits {, allowing for timely and adequate notice} . Refer to ACL No. 21-25 issued on March 4, 2021 for more information on PACF.	No	Yes

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)
		{Note: This “Grant change only” type of mid-period change applies to the change in grant amount but not all other information reported for that program.}			
PVS Reports	N/A	Payment Verification System (PVS) reports provide benefit information from SSA and EDD.	Act on information mid-period {, allowing for timely and adequate notice} . Only request verification if information reported on the PVS report is unclear per guidance in ACL No. 18-20 .	No	Yes
Receipt of Substantial Lottery and/or Gambling Winnings {(Not IEVS)}	Mandatory	The CWD has information [of] {submitted by the household of the} receipt of substantial lottery and/or gambling winnings.	<p>If the CWD receives information mid-period indicating that the household received substantial lottery and/or gambling winnings, other than from a gaming entity match, the CWD must verify the winnings {, if not verified at the time the report was made,} and if the dollar amount of the winnings is above the maximum allowed, must discontinue the entire household based on the receipt of the winnings at the end of the month in which timely and adequate notice can be provided.</p> <p>Per FNS direction, {the household may report the information either verbally or in writing, without documentary evidence, and detailed}</p>	Yes, {if at the time of the report, the household did not verify winnings and dollar amount.}	{No} [Yes, if the information is directly provided by a gaming entity match.]

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)
			<p>case narration is acceptable as verification for a report of substantial winnings. {For example, the case narration of the household's verbal report of the substantial winnings that includes the date, amount and source of the winnings is acceptable as verification.}</p> <p>{If at the time of the report, the household did not provide all information required to act on the change, verification of winnings and dollar amount, then the CWD must attempt to verify the information by contacting the household via telephone or sending a CW 2200. If the household does not respond, the CWD must discontinue the household for failure to provide.}</p>		
Report of Change in Student Status	Voluntary	Household reports a change in student status or a [different change such as a change in employment which results in information about a change in student status] {change in student exemption information (with or without verification)} .	<p>If the change would result in a decrease in benefits, do not request verification, send the household a No-Change NOA, and document the information in the case record to follow-up at the next recertification (student status is not a SAR reporting requirement). {Even if the household provided verification along with the reported change, the CWD must not act on the information.}</p> <p>If the change would result in an increase in benefits, the CWD must send the household a CW 2200 requesting verification, if applicable,</p>	No, if it would result in a decrease in benefits. {Yes, if verification is needed to act on a change that would cause an increase in benefits.}	No

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)
			<p>[and act on the change appropriately] {to obtain the information required to act on the change. If the household already provided verification, no need to resend the CW 2200. Once all verification/information is obtained the CWD must act to increase benefits.</p> <p>If the household does not respond to the CW 2200 send the household a No-Change NOA, document the information in the case record and follow-up at the next SAR 7 or recertification, whichever comes first</p> <p>Note, depending on the type of exemption, CWDs are reminded to follow mid-period rules for the type of reported change. For example, if the reported change is income, the CWD must also follow mid-period income rules. Additionally, if the household reports a new student exemption for an excluded student, the CWD must follow mid-period household composition change rules. Refer to ACL No. 24-31 issued on May 3, 2024, for additional guidance on CalFresh Student Eligibility}.</p>		
Report of Fleeing Felon	N/A	Federal regulations make any individual found to be a fleeing felon or in	Take action to remove the individual from the CalFresh household. If the change results in a decrease in benefits make the change at the end of the	No	No

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)
		violation of a condition of probation or parole imposed under a federal or state law ineligible for CalFresh.	month in which timely and adequate notice can be provided. Refer to ACL No.15-82 issued on October 14, 2015 for further guidance and details on the definition of fleeing felon or a probation or parole violator.		
Request to Close Case	Voluntary	Household requests to close CalFresh case.	If request is from the head of household, a responsible adult household member, or Authorized Representative, the request is actionable and requires no further verification. If request is made verbally, discontinue the case at the end of the month in which timely and adequate notice can be provided. If the request is made in writing or in the presence of an eligibility worker, only adequate notice is required.	No	No
Shelter Expense Change	Voluntary	Household voluntarily reports a change in shelter expense.	As of September 1, 2019, shelter costs must not be verified, unless questionable. However, if the household does not provide information about the amount of the new shelter costs at the time they report the change, send the household a CW 2200 {to request new shelter cost information} . [If household fails to provide information within 10 days, send notice that CalFresh benefits will be recalculated without the shelter deduction.] {If the household does not respond to the CW 2200, send the household a No-Change NOA,	No	No

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)
			<p>document the information in the case record and follow-up at the next SAR 7 or recertification, whichever comes first}. The household may contact the CWD anytime to provide updated information.</p> <p>Once the CWD has been informed of the new shelter costs the CWD must recalculate the household's budget and act accordingly to the change.</p> <p>{If all information/verification is provided, and the change would result in a decrease in benefits send the household a No-Change NOA and document the information in the case record to follow-up at the next {SAR7 or} recertification, whichever comes first.}</p> <p>If the change would result in an increase in benefits, the CWD must act to increase the household's benefits. }</p>		
Third-Party Reports	N/A	A change reported mid-period by a source other than the household.	Unless the third-party report is considered VUR, do not request verification and do not act. {An example of a third-party report considered VUR is a PVS match reporting EDD wage information.}	No	Depends on the type of report.
Unclear Information	N/A	The CWD may receive unclear information about a household's	Pursue verification only if unclear information received outside the periodic report is: fewer than 60 days old relative to the current month of	If applicable	Not typically but depends on the type of report.

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)
		<p>circumstances from which the CWD cannot readily determine the effect on the household's continued eligibility or benefit amounts. The CWD may receive such unclear information from a third party.</p> <p>Unclear information may be information that is VUR, but is unclear because the CWD needs additional information to act on the change appropriately.</p>	<p>participation {(the first day of the month in which the information was received)}, [significantly conflicts with information used by the CWD at the time of initial certification or recertification] and would, if accurate, have been required to be reported. "Required to be reported" means that the household may have missed a mandatory report.</p> <p>{Additionally, the CWD must also act when information received significantly conflicts with information used by the CWD at the time of initial certification or recertification.}</p> <p>If {CWD follow up is required and} the household does not respond to the request for information or responds but refuses to provide verification by the specified date, the CWD must send the household a timely and adequate discontinuance NOA with information that explains the reason for action. {If the household responds to the CW 2200 request and provides information/verification, the CWD must evaluate whether the information is a mandatory mid-period report or VUR. If the information is not a mandatory mid-period report nor VUR, then the CWD must only act on the</p>		

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)
			information/verification if it results in an increase.} Refer to ACL 18-20 for additional guidance on “unclear information”.		

ABAWD: Able-Bodied Adult Without Dependents
COLA: Cost of Living Adjustment
CW: CalWORKs
CWD: County Welfare Department
E/D: Elderly/Disabled
EDD: Employment Development Department
FNS:
FPL: Federal Poverty Limit
IEVS: Income and Eligibility Verification System
IPV: Intentional Program Violation
IRT: Income Reporting Threshold
MCE: Modified Categorically Eligible
NOA: Notice of Action
PA: Public Assistance
PACF: Public Assistance CalFresh
PVS: Payment Verification System
SAR: Semi-annual Report
SSA:
USPS: United States Postal Service
VUR: Verified Upon Receipt

ATTACHMENT B

Date

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

EXECUTIVE SUMMARY

ALL COUNTY LETTER NO. 21-101 REVISED

This All County Letter provides guidance to County Welfare Departments regarding action on information received during the certification period for CalFresh under simplified reporting rules and California's Semi-Annual Reporting system.



JENNIFER TROIA
DIRECTOR

CALIFORNIA HEALTH & HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
744 P Street • Sacramento, CA 95814 • www.cdss.ca.gov



GAVIN NEWSOM
GOVERNOR

DATE

ALL COUNTY LETTER NO. 21-101 REVISED

TO: ALL COUNTY WELFARE DIRECTORS
ALL CALFRESH PROGRAM SPECIALISTS
ALL CALWORKS PROGRAM SPECIALISTS
ALL IHSS PROGRAM SPECIALISTS
ALL QUALITY CONTROL COORDINATORS
ALL CONSORITA REPRESENTATIVES

SUBJECT: CALFRESH MID-PERIOD ACTIONS (REVISED)

REFERENCE: [TITLE 7 CODE OF FEDERAL REGULATIONS \(CFR\) 7 CFR 273.2\(f\)\(8\)\(ii\); 7 CFR 273.2\(f\)\(11\); 7 CFR 273.11\(n\); 273.12\(a\)\(5\)\(vi\); 7 CFR 273.12\(a\)\(5\)\(vi\)\(B\); 7 CFR 273.12\(a\)\(5\)\(vi\)\(B\)\(4\); 7 CFR 273.12\(a\)\(5\)\(v\); 7 CFR 273.12\(a\)\(1\)\(vii\); 7 CFR 273.12\(c\); 7 CFR 273.12\(a\)\(5\)\(vi\)\(B\)\(1\); 7 CFR 273.12\(a\)\(5\)\(vi\)\(B\)\(2\); 7 CFR 273.12\(c\)\(4\)\(iv\); 7 CFR 273.12\(a\)\(5\)\(vi\)\(B\)\(3\); 7 CFR 273.13\(a\)\(3\); 7 CFR 273.13\(b\); FNS MEMO DATED AUGUST 21, 2019 ON INFORMATION FROM THIRD PARTY PAYROLL SOURCES; MANUAL OF POLICY AND PROCEDURES SECTION 63-503.7; ALL COUNTY LETTER \(ACL\) ACL 12-25; ACL 12-25E; ACL 15-82; ACL 17-41; ACL 17-58; ACL 18-20; ACL 19-33; ACL 19-93; ACL 20-132; ACL 21-25; ACL 21-16; ALL COUNTY INFORMATION NOTICE I-41-10](#)

This All County Letter (ACL) provides guidance regarding County Welfare Department (CWD) action on information received during the certification period for CalFresh under simplified reporting rules and California's Semi-Annual Reporting (SAR) system. The term "mid-period action" refers solely to required CWD action on information received during the certification period. This guidance does not apply to information received at initial certification, periodic report (i.e., SAR 7), or recertification. This ACL supersedes all prior policy guidance regarding CWD action on information received during the

certification period. That said, when implementing this guidance CWDs must also consider current waivers which may impact policy related to mid-period actions

and are not reflected in the guidance as they are only available based on USDA, FNS approval. This newly issued guidance will refer to “during the certification period” as “mid-period”.

Background

Simplified reporting supports program participation of eligible households by allowing extended certification periods and reduced reporting requirements per federal Supplemental Nutrition Assistance Program (SNAP) regulations at [7 Code of Federal Regulations \(CFR\) 273.12\(a\)\(5\)](#). Under simplified reporting, there are two distinct policy options for how state agencies respond to information received about a household during the certification period. These policy options do not apply to information received about a household at initial certification, periodic report (i.e., SAR 7), or recertification. State agency action on information received about a household at initial certification, periodic report, or recertification is informed by other federal regulations.

The two policy options for how state agencies respond to information received mid-period are:

1. Act on any change in household circumstances; or
2. Do not act on changes that would result in a decrease in the household's benefits, with certain exceptions.

With the implementation of simplified reporting and SAR, California chose the second option to act only on certain information reported mid-period. Under this option described at [7 CFR 273.12\(a\)\(5\)\(vi\)\(B\)](#), the CWD must act on information that would increase the household's benefits and must not act on information that would decrease the household's benefits unless:

1. The household has voluntarily requested that its case be closed.
2. The state agency has information about the household's circumstances that is considered “verified upon receipt” (VUR). Refer to page eight of this letter for details on VUR information.
3. A household member has been identified as a fleeing felon or parole violator. Refer to [ACL 15-82](#) issued on October 14, 2015, for the definition of fleeing felon and parole violators.
4. There has been a change in the household's Public Assistance (PA) grant.

PA means California Work Opportunity and Responsibility to Kids (CalWORKs), Tribal Temporary Assistance for Needy Families (TANF), SSI/SSP, and General

Assistance/General Relief (GA/GR). Refer to [ACL 21-25](#) issued on March 4, 2021, for more information on PA.

5. The state agency has verified information that a member of a household has received substantial lottery or gambling winnings.

Substantial winnings are defined as a cash prize won in a single game, purchase of a ticket, hand or similar bet, which is equal to or greater than the CalFresh resource limit for elderly or disabled households. Refer to [ACL 20-132](#) issued on December 11, 2020, for guidance regarding action on receipt of substantial lottery and gambling winnings.

Additionally, under [7 CFR 273.12\(a\)\(5\)\(iii\)\(G\)](#) there are three changes, referred to as “mandatory reports,” that CalFresh households must report within 10 days of the date the change becomes known to the household. The state agency must act on mandatory reports mid-period regardless of the impact on benefits:

1. Gross monthly income received over the Income Reporting Threshold (IRT).
2. A reduction in work hours below 20 hours per week, averaged monthly, for Able Bodied Adults Without Dependents (ABAWDs) subject to the ABAWD time limit.
3. Receipt of substantial lottery and gambling winnings.

Finally, under [7 CFR 273.12\(e\)](#) the CWD must act on certain mass changes mid-period. These changes are known as “county initiated mid-period actions” and are defined as mass changes or changes that the household does not need to report, such as a Cost of Living Adjustment (COLA) or a change in eligibility criteria due to legislative or regulatory action.

Acting on voluntary mid-period reports

Following the option that California chose under [7 CFR 273.12\(a\)\(5\)\(vi\)\(B\)](#), the CWD must act mid-period on information voluntarily reported by a household that would increase benefits. When a household makes a voluntary mid-period report of a change in circumstances, the CWD must act promptly to determine if the change affects the household’s eligibility or allotment.

The CWD must not take action on voluntary mid-period reports that will result in a **decrease** in a household’s benefits, unless otherwise specified. Note, a “decrease in a household’s benefits” includes ineligibility. Whenever the CWD does not take action on a voluntary mid-period report because it will result in a decrease in a household’s benefits, the CWD must document clearly in the case record the reason for not taking action and must send the household a No-Change Notice of Action (NOA). The notice must also remind the household that they have to report the information at the next

SAR 7 or recertification, whichever comes first.

For mid-period changes reported but not acted on, the CWD must ensure the information, if still applicable, is reported at the household's next SAR 7 or recertification and resolve any inconsistencies or discrepancies. If a voluntary change is reported and verified at the household's next SAR 7 or recertification, the CWD must take action regardless of the impact on benefits.

Under [7 CFR 273.12\(c\)\(1\)\(i\)](#), when a reported change will result in an **increase** in the household's benefits, the change must be effective no later than the first allotment issued 10 days after the date the change was reported. The CWD must act on the reported change effective the month after the report is made, regardless of the report date in the preceding month. The CWD must issue the increased benefits by the household's next monthly benefit allotment date, or no later than the 10th day of the following month in which the report was made. For example, a \$40 decrease in income reported on October 15 would increase the household's monthly benefit allotment for the November benefit month. If the same decrease in income were reported on October 28, and it is too late in the month to make the change to the household's monthly benefit allotment because the household's monthly benefit allotment takes effect early November (e.g., November 1), the household will receive their monthly benefit allotment on November 1. The CWD must then issue a supplemental benefit by November 10.

Under [7 CFR 273.12\(c\)\(1\)\(ii\)](#), there are only two situations when the CWD is required to issue a supplement when a change is reported too late in the month to increase the household's next monthly benefit allotment: 1) when there is an increase in a household's benefits due to the addition of a new household member who is not a member of another certified household; or 2) when there is a decrease of \$50 or more in the household's gross monthly income. However, States have flexibility to issue supplements for other reported changes that result in an increase in benefits. The CDSS is requiring CWDs to act on the reported change effective the month after the report is made, regardless of the report date in the preceding month. The CWD must issue the increased benefits by the household's next monthly benefit allotment date, or no later than the 10th day of the following month in which the report was made. For example, if the household reports a decrease in income on October 28, and the household's monthly benefit allotment takes effect on November 1, the household would receive their monthly benefit allotment on November 1 and the CWD must issue a supplement to November benefits by November 10.

Supplements must not be provided for the report month or months prior to the report month. For example, a household receives their monthly benefit allotment on the 1st of the month. The household's income decreases August 1, but the household does not report it to the CWD until October 28. The CWD must not issue a supplement for August, September, or October. The increase in benefits or supplement is effective in November.

Note, the CWD must act on any change which would result in an increase in benefits, not just income changes. Examples include, but are not limited to, adding a new household member with no income and a change in shelter expenses, dependent care costs, or other deductible expenses.

In cases where the CWD requires verification to act on the change that would result in an increase in benefits, the CWD must inform the household in writing of the additional verification requirements and that failure to provide the verification within the specified date will result in no change to benefits. If the household fails to provide the required verification within 10 days of the change being reported but provides the verification at a later date, then the timeframe for taking action on changes must run from the date verification is provided rather than from the date the change was reported. Once the household provides the required verification, the CWD must issue the benefit increase no later than the 10th day of the following month in which the verification was received.

Following federal regulations at [7 CFR 273.2\(f\)\(8\)\(ii\)](#), the CWD must not verify changes in income if the income source has not changed and if the amount has changed by \$50 or less, unless the information is incomplete, inaccurate, inconsistent or outdated (older than 60 days). Since CWDs must only act on voluntary mid-period information that results in no change or an increase to the household's benefits, unless otherwise specified, the CWD must only require verification of an income change if it is over \$50, and the change would result in an increase to the household's benefits, or the income change is \$50 or less and the income source has changed.

For changes that would result in a decrease or no change in benefits, the CWD must not request verification and must document in the case record any voluntarily reported information, including any verification submitted voluntarily. Even if verification is submitted for changes that would result in a decrease in benefits the CWD must not act but must follow up with the household at the household's next periodic report (i.e., SAR 7) or recertification, whichever comes first.

Proper documentation in the case record is imperative for all changes reported mid-period even if the CWD does not act on the change. Proper documentation means the information reported by the household is documented to support eligibility, ineligibility, benefit level determination or no action by the CWD. Documentation must be in sufficient detail to allow a reviewer to determine the reasonableness and accuracy of the determination.

To close out this section, it is important to remember that households certified with income between 131 and 200 percent Federal Poverty Level (FPL) do not have a mandatory income reporting requirement because they have already reported income over 130 percent at application and met their mandatory IRT reporting requirement. Therefore, if a household certified with income between 131 and 200 percent FPL makes a report of an income change mid-period it is considered a voluntary report and rules outlined in this section must be applied accordingly.

Mid-Period Action Overview

The following section provides an overview of when the CWD must act based on information received mid-period.

The CWD must act mid-period, **regardless of an increase or decrease** in benefits, when the following information is received:

1. A mandatory report made by the household, including:
 - a. Gross monthly income received over the IRT;
 - b. A reduction in work hours below 20 hours per week, averaged monthly, for ABAWDs subject to the time limit; or
 - c. Receipt of substantial lottery and gambling winnings.
2. A voluntary report made by the household of a change in circumstances resulting in an increase in benefits.
3. A voluntary request made by the household to close their CalFresh case.
4. A voluntary report made by the household of a change in residence. The CWD must investigate and take action on potential changes in shelter costs arising from this reported change.
5. The three-month limit for an ABAWD subject to the time limit ends or an ABAWD who has regained eligibility, is not exempt, and does not reside in an area with an ABAWD waiver, stops meeting the work requirement. The CWD must also evaluate whether the ABAWD has exhausted their three additional consecutive months. Refer to [ACL 19-93](#) issued on September 12, 2019, for guidance on ABAWD eligibility.
6. Failure of a member of the household to comply with a Quality Control Review.
7. The CWD has verified that the CalFresh recipient is receiving SNAP benefits in another state.
8. A household member has been identified as a fleeing felon or probation or parole violator.
9. Verified Nationwide Prisoner Match (NPM) or Deceased Persons Match (DPM). Refer to [ACL 19-33](#) issued on April 16, 2019, for guidance on NPMs and DPMs.
10. Household failure or refusal to provide the CWD with mid-period verification of questionable information.

Failure or refusal to provide the CWD with verification or information for deductions that are deemed/considered questionable deductions, dependent care, medical expense, shelter cost, child support paid will result in the household's benefits being recalculated without the deduction.

11. Information that is considered VUR (see page eight of this letter for VUR details).
Information considered VUR is limited to the following:

- a. A voluntary report made by the household of a household composition change.
- b. A voluntary report made by the household of a change of address.
- c. A Payment Verification System (PVS) report.

The PVS match contains Retirement, Survivors and Disability Insurance data from the Social Security Administration, State Unemployment Insurance, and State Disability Insurance data from California's Employment Development Department (EDD).

- d. Social Security and Supplemental Security Income and/or California State Supplementary Payment (SSI/SSP) benefit information obtained from the Social Security Administration (SSA).

Benefit information obtained from SSA is considered reported and verified on the day the information is first known to the agency through any automated data exchange system, including Income Eligibility Verification System (IEVS), State Data Exchange (SDX), or Beneficiary Earnings and Data Exchange (BENDEX). The SDX and BENDEX data is available in MEDS via the "Title XVI -SSI/SSP Information" screen, also known as the INQX screen.

- e. Unemployment insurance benefit (UIB) and State Disability Insurance benefit information that are reported through IEVS and obtained from the California EDD.

UIB information is considered reported and verified on the date of the IEVS notification.

- f. Worker's compensation benefits obtained from the California Worker's Compensation agency.

- g. A California Intentional Program Violation (IPV) report.

The IPV needs to be established in order to disqualify the individual.

- h. PA benefit amount information, not limited to CalWORKs, obtained directly from the CWD. See page two of this letter for the definition of PA.

PA benefit amount information is considered reported and verified on the date the PA benefit amount is authorized.

- i. Information regarding non-citizen status obtained from the Systemic Alien Verification for Entitlements (SAVE) system.
- j. Information regarding In-Home Supportive Services provider wages obtained from the Case Management Information and Payrolling System.
- k. Information regarding the removal of a child from a CalFresh household obtained from Child Protective Services and/or the county Foster Care system.
- l. Information that a household member received substantial lottery or gambling winnings obtained from a gaming entity data match.

For voluntary household mid-period reports, the CWD must only act if the reported information and/or verification is VUR, or the information would result in an increase. Additionally, the CWD must only act on third-party information if the information is considered VUR. Any other changes reported mid-period that would result in a decrease or no change in the household's benefits, the CWD must not request verification and must document the voluntarily reported information, including any verification submitted voluntarily, in the case record. Even if the household voluntarily submitted verification for a reported change that would result in a decrease or no change, the CWD must not act. The CWD must document the voluntarily reported verification in the case record and follow up at the household's next SAR 7 or recertification, whichever comes first.

Verified Upon Receipt

When the CWD receives information about a household's circumstances that is considered VUR, the information requires mid-period action with no further verification, regardless of the impact on benefits. "Verified upon receipt" is a term given to a state-prescribed list of specific information that comes directly from the source of information and is free from question. It is important to remember that information cannot *become* VUR just because additional verification has been provided to the CWD. For example, if the household reports an income increase (under IRT) over the telephone and then sends the county their paystubs, the information does not become VUR. In this case, the CWD would send a No-Change NOA to the household and follow-up at the household's next SAR 7 or recertification, whichever comes first.

Information considered VUR may or may not ultimately result in CWD mid-period action. Additionally, CWD action may include sending the household a No-Change NOA and not acting until the household's next SAR 7 or recertification, whichever comes first.

Information considered VUR may become known to the county through a voluntary report, mandatory report, electronic source, or any other means. California's prescribed list of information that is considered VUR is provided beginning on page six of this letter, item 10 including subpoints a through l.

Information reported to the CWD that is considered VUR must meet the following criteria:

1. Obtained from the Primary Source

A primary source is a first-hand direct source that has complete and accurate information regarding the circumstances in question.

2. Complete

The information has all the components necessary to take action.

3. Not Questionable

There are no contradicting or discrepant elements to the information that would cast doubt on its timeliness, completeness, or accuracy.

4. Requires no Further Verification

Action can be taken without further verification.

If the information is VUR and the CWD does not need any additional information to act on the change, then the CWD must take action.

While the guidance contained in this letter is specific to action on information received mid-period, please note that information considered VUR must also be acted on at the time of initial certification, periodic report (i.e., SAR 7), and recertification.

Unclear Information

Unclear information refers to information reported about a household's circumstances for which the CWD cannot readily determine the effect on the household's continued eligibility or, in certain cases, the effect on the benefit allotment. Unclear information is information that may or may not be considered VUR, but for which the CWD needs additional information to act on the change appropriately. Unclear information is not restricted to third-party information and may be received through other sources, such as

the household.

Guidance regarding action on unclear information received mid-period was released via [ACL 18-20](#) issued February 28, 2018. Changes to CWD action on unclear information are a result of updated federal procedures, primarily for information received through data matches. As the number of available data matches has grown with varying degrees of accuracy and frequency, the increase in unclear information received by CWDs has resulted in CWDs sending requests for verification to households to clarify

information that is outdated or that households are not required to report. This created an additional burden and a barrier to program participation for eligible households, many of whom were then discontinued for failure to respond to the request for verification. The federal changes to procedures for acting on unclear information are intended to address this burden.

As outlined in [ACL 18-20](#), the CWD must follow-up on unclear information if the information:

1. Is less than 60 days old relative to the current month of participation; and
2. Was required to have been reported based on the reporting system to which the household was assigned (in California, all CalFresh households are assigned to SAR.)

The updated procedures also require CWDs to follow-up if the unclear information appears to present significantly conflicting information about household circumstances from that used by the CWD at initial certification or recertification. Please note that “significantly conflicting information” applies only to information received mid-period about the information the household provided to the CWD at the time of initial certification or recertification, under normal processing and expedited service standards [[7 CFR 273.2\(g\)\(1\)](#) and [7 CFR 273.2\(i\)\(3\)](#)]. For example, if a household is certified with no earned income and the state obtains information from a third-party source four (4) months into the certification period indicating that the household had earned income of \$1000 during the month used for initial certification, then this information would be significantly conflicting, and the CWD would need to send a [Request for Verification \(CW 2200\)](#) to the household. If the household does not respond, the CWD must discontinue the case due to failure to respond.

If a CWD receives unclear information about a household outside of the periodic report that is less than 60 days old relative to the current month of participation and, if accurate, must be reported, the CWD must send a request for verification using the CW 2200 form. If the household does not respond to the request for verification or responds but refuses to provide verification within 10 days, a notice of discontinuance must be sent to the household with information that explains the reason for action. All CalFresh households are assigned to SAR and, as previously stated, are only required to report gross monthly income received over the IRT, a drop in work hours for ABAWDs subject to the time limit, and receipt of substantial

lottery and gambling winnings. Once the household has responded to the request for verification due to the unclear circumstances, the CWD must act accordingly.

If the unclear information is more than 60 days old relative to the current month of participation, was not required to be reported, or does not present significantly conflicting information from that used by the CWD at initial certification or recertification, the CWD must not act on this information and must not require the household to provide verification until the household's next periodic report or recertification, whichever comes first. CWDs may also refer to [FNS Guidance on Information from Third Party Payroll Sources](#) issued on August 21, 2019 and ACL 21-16 issued on March 8, 2021, for more information on how to act on Information from Third Party Payroll Sources and unclear information.

As mentioned on page nine of this letter, the CWD may receive information mid-period that is typically considered VUR but not sufficient for the CWD to act. This information would then be considered unclear, because the CWD would need additional information to act on the change. For example, the CWD receives information such as a household statement that a new person joined the household, but the household does not report any other information regarding the new household member. The report of the household composition change is considered VUR, however, in this case, the CWD needs additional information and verification from the household about the new household member to determine eligibility and whether a change to the benefit allotment is necessary.

Timelines For Acting On Disqualified Recipient Database Matches

Following regulations at [7 CFR 273.2\(f\)\(11\)](#), the CWD must take immediate action to pursue verification of positive matches within the disqualified recipients database received mid-period. Disqualified recipient database matches include, but are not limited to, the Fleeing Felon Match, California Youth Authority Match, NPM, and DPM. The CWD cannot hold unclear information received from any disqualified recipient databases regardless of how old the information is. Refer to [ACL 19-33](#) issued on April 16, 2019, for guidance on how to act on NPM's and DPM's.

Information Known To The Agency

The federal definition of "state agency" requires that, for SNAP purposes, the state agency must include the organizational entity responsible for administering TANF and other assistance programs, including medical assistance programs. The CWDs in California have integrated the operation of CalFresh, CalWORKs, and Medi-Cal programs. That said, because California has opted to act only on certain changes, the CWD does not need to act for CalFresh if the household reports a change for the other program in which it is participating, and the reported change does not result in a change for that other program, but would result in a decrease to the household's CalFresh benefits. "Information Known to the Agency" refers to information reported to and acted

on by the CalWORKs and/or Medi-Cal programs which results in a CalFresh benefit increase or a change that would impact the CalFresh case without decreasing benefits.

An example of Information Known to the Agency includes a household reporting an address change to CalWORKs. In this case, because the reported change caused an action for CalWORKs and impacts CalFresh the CWD must act for CalFresh and follow all mid-period address change rules. However, if a Welfare-To-Work CalWORKs recipient provides income information for Welfare-To-Work purposes but the income information does not cause a change in their CalWORKs benefit amount, and CalWORKs eligibility and benefits stay the same, then the information is not considered "Information Known to Agency" and the CWD must not act for CalFresh.

Quality Control

CWDs are reminded to complete case comments regarding information received by the CWD mid-period. Case comments indicating whether the information received led to a mid-period action or not and the result of the mid-period action or inaction will provide quality control reviewers with adequate information to effectively complete the review and support CWDs in avoiding unnecessary errors.

If you have any questions regarding this letter, please contact the CalFresh Policy Bureau at CalFreshPolicy@dss.ca.gov.

Sincerely,

Original Document Signed By

ALEXIS FERNÁNDEZ GARCIA
Deputy Director
Family Engagement and Empowerment Division

Attachments

All County Letter (ACL) No. 21-101E Appendix (REVISED)
CalFresh Mid Period Report Action Guide

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)?
ABAWD Reduction in Work Hours	Mandatory	ABAWDs <i>who are subject to the time limit</i> are required to report, within 10 days, when work hours drop below 20 per week, or 80 hours averaged monthly.	Determine if the individual qualifies for an ABAWD exemption, meets good cause criteria, is eligible to receive an additional three consecutive months of eligibility, or can receive a percentage exemption. If none of these apply, determine if individual has any remaining months in their three countable months of benefits within the 36-month period. If not, discontinue benefits at the end of the month in which timely and adequate notice can be provided.	No	No
Address Change: Report of change in residence	Voluntary	Household voluntarily reports an address change or an institution such as a Drug Addiction or Alcoholic treatment center (DAA) reports that a household left the DAA.	Determine the impact on shelter costs. The CWD must not disregard a change in shelter costs related to the address change. This includes a report of a household leaving a drug addiction or alcoholic treatment and rehabilitation center (DAA Treatment Center) made by the DAA Treatment Center using a change report form which includes the household's address change. Refer to ACL No. 19-51 issued on May 23, 2019 for additional guidance. As of September 1, 2019, shelter costs must not be verified, unless	Yes	Yes

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)?
			<p>questionable. Client statement of shelter costs is sufficient. Refer to ACL No. 19-86 issued August 21, 2019 for additional guidance.</p> <p>If the household does not provide information about shelter costs when they report the address change, the CWD may attempt to contact the household via phone to get shelter cost information. If phone attempt(s) are unsuccessful, or if the county does not attempt phone contact, then the CWD must send a CW 2200 requesting information. If the household fails to provide information within 10 days, and does not request assistance obtaining the verification, then recalculate benefits without the shelter deduction and send the household a timely and adequate notice of action.</p> <p>The household may contact the CWD anytime to provide shelter cost information. Once the CWD has received the shelter cost information the CWD must recalculate the household's budget with the shelter deduction effective the month following the reported change.</p> <p>Note, as of the publication date of this letter California is under the "Alternate Procedures When Change of Address</p>		

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)?
			is Reported" FNS waiver. Refer to ACWDL , issued March 28, 2023, and ACL No. 24-47 , issued June 28, 2024 for additional guidance.)		
Address Change: Returned Mail	N/A	The United States Postal Service (USPS) returns mail to the CWD indicating the household is no longer at address.	<p>If no forwarding address is provided by USPS, document the information in the case record and follow-up at the next SAR 7 or recertification, whichever comes first.</p> <p>If there is a forwarding address provided by USPS, whether a sticker or handwritten on the envelope, do not consider an address change unless confirmed by the household. As a best practice the CWD should contact the household via telephone to confirm the address change. If the household is not reachable, send the household a CW 2200 to the address on file. If the household fails to provide information within 10 days, and does not request assistance obtaining the verification, then recalculate benefits without the shelter deduction and send the household a timely and adequate notice of action.</p> <p>If the household provides the requested information, the CWD must act on the change according to simplified reporting rules.</p>	Yes, only if forwarding address is provided.	No

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)?
			Note, as of the publication date of this letter California is under the "Alternate Procedures When Change of Address is Reported" FNS waiver. Refer to ACWDL , issued March 28, 2023, and ACL No. 24-47 , issued June 28, 2024 for additional guidance.		
Child Support Exclusion	Voluntary	Household voluntarily reports legally obligated child support payments (including arrearages) that a household member pays to or for an individual living outside the household. This report may be an update in the amount of child support paid.	<p>Legally obligated child support payments are treated as income exclusions. If a household makes a mid-period report of new or updated child support payment, the household must determine impact on benefits, regardless of whether the household provided verification.</p> <p>If the change would result in a decrease in benefits, do not request verification (if not provided) and send the household a No-Change NOA, document the information in the case record, and follow-up at the next SAR 7 or recertification, whichever comes first. Even if the household provided verification along with the reported change, the CWD must not act on the information.</p> <p>If the change would result in an increase in benefits, the CWD must send the household a CW 2200 requesting verification, if applicable, to obtain the information required to act on the change. If the household already</p>	Yes	No

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)?
			<p>provided verification, no need to resend the CW 2200. Once all verification/information is obtained the CWD must act to increase benefits.</p> <p>If the household does not respond to the CW 2200 send the household a No-Change NOA, document the information in the case record and follow-up at the next SAR 7 or recertification, whichever comes first. Refer to ACL 06-31 dated August 16, 2006, for further guidance on the treatment of legally obligated child support income exclusion.</p>		
County Initiated Mass Change	N/A	County initiated mid-period actions are mass changes or changes that the client does not need to report, such as a Cost of Living Adjustment (COLA) or a change in eligibility criteria due to regulatory or legislative action.	Act on all county initiated actions, even if the action results in a decrease or termination of benefits.	No	No
Household Composition Change (Clear Information)	Voluntary	Household voluntarily reports a change in household composition and	If the change would result in a decrease in benefits, do not request any other mandatory verifications, if applicable, send the household a No-Change NOA, and document the information in the	No	Yes, for the household composition change.

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)?
		provides information and/or verification, regarding a new household member and the CWD can clearly determine impact to the household's benefits.	<p>case record and follow-up at the next SAR 7 or recertification, whichever comes first. Even if the household provided verification along with the reported change, the CWD must not act on the information.</p> <p>If the change would result in an increase in benefits, the CWD must act to add the new household member.</p>		
Household Composition Change (Unclear Information)	Voluntary	Household voluntarily reports a change in household composition and the household did not provide or know the new household member's information/ verification. As a result, the CWD does not know the impact to the household's benefits.	<p>The CWD must send the household a CW 2200 requesting necessary information and/or verification to evaluate the impact on the household's benefits.</p> <p>If the household responds to the CW 2200 and provides the required information and/or verification, the CWD must act on the change according to simplified reporting rules. If the change would result in a decrease in benefits, the CWD must not act on the change, send the household a No-Change NOA, and document the information in the case record and follow-up at the next SAR 7 or recertification, whichever comes first. If the change would result in an increase in benefits, the CWD must act to add the new household member.</p>	Yes, because this is considered unclear information.	Yes, for the household composition change only.

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)?
			If the household does not provide the required verification, the CWD must send a No-Change NOA and follow-up at the next SAR 7 or recertification, whichever comes first.		
Household Composition Change – Household member removal	Voluntary	Household voluntarily reports a change in household composition.	A voluntary mid-period report of a household composition change is considered VUR. Therefore, unless questionable, the CWD must act on removing the existing household member from the case, regardless of the impact to the household's benefits.	No	Yes
IEVS Report (other than PVS and Lottery Matches)	N/A	Recipient or Applicant IEVS data match including but not limited to, SSA benefit amounts, Deceased Persons Match, UIB benefit amounts.	<p>Recipient IEVS match follow-up must be completed within 45 calendar days of the Department transmitting the match to the county. Refer to ACL No. 17-41 issued on June 6, 2017 for additional guidance.</p> <p>If the IEVS match information is unclear and meets the criteria for 'unclear information', the CWD must follow the rules for unclear information per guidance in ACL 18-20 issued on February 28, 2018.</p>	Yes, depending on the type of report.	Yes, only for certain IEVS report matches such as SSA benefit amounts.
IEVS Receipt of Substantial Lottery	N/A	CA Lottery Recipient IEVS Match through IEVS Secure Automated File Exchange or SAFE	The CWD must review case information to check if lottery winnings have been reported. Case narration can verify substantial winnings. The lottery match is considered VUR, so a client verification letter (GEN 201-R) is not needed before action. If the winnings are unreported and exceed the	No	Yes

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)?
			maximum allowed, the CWD must discontinue the entire household within 45 days of receiving the match. Refer to ACL No. 24-29E issued September 6, 2024 for additional guidance.		
Income: Change of \$50 or Less	Voluntary	Household voluntarily reports an income change of \$50 or less.	<p>If the change would result in a decrease in benefits, document the information in the case record, send the household a No-Change NOA, and follow-up at the next SAR 7 or recertification, whichever comes first.</p> <p>If the change would result in an increase, the income change is \$50 or less, and the source did not change, the CWD must not request verification and must act on the change to increase benefits. If the income source has changed, the CWD must request verification before acting on the change to increase benefits.</p>	No	No
Income: Change of More Than \$50 but less than household IRT	Voluntary	Household voluntarily reports an income change of more than \$50.	<p>If the change would result in a decrease in benefits, do not request verification, send the household a No-Change NOA, document the information in the case record, and follow-up at the next SAR 7 or recertification, whichever comes first. Even if the household provided verification along with the reported change, the CWD must not act on the information.</p> <p>If the change would result in an increase in benefits, the CWD must</p>	Yes	No

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)?
			<p>send the household a CW 2200 requesting verification, if applicable, to obtain information/verification required to act on the change. If the household already provided verification, no need to resend the CW 2200. If the household provides the required verification after receiving the CW 2200, the CWD must act on the change appropriately.</p> <p>If the household does not provide the required verification, after receiving the CW 2200, the CWD must send a No-Change NOA, document the information in the case record and follow-up at the next SAR 7 or recertification, whichever comes first.</p>		
Income: Uncertain if Over IRT of 130% FPL	Voluntary	Household is uncertain if gross monthly income is over IRT.	<p>Follow-up with the household to determine if gross monthly income received exceeded the IRT. If it hasn't, take no further action. If it has, determine what amount of income is reasonably anticipated to continue.</p> <p>If the household income over the IRT cannot be reasonably anticipated to continue, because the household does not know when to expect the income again, do not act and send the Reporting Changes for Cash Aid and CalFresh (SAR 2) form, reminding the household of its IRT and reporting rules, and a No-Change NOA.</p>	Yes, if the CWD needs to verify income over IRT.	No

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)?
			<p>If the household income over the IRT can be reasonably anticipated to continue send the household a CW 2200 requesting verification of new income. A CW 2200 must be sent to verify income over IRT because the CWD must assess the household's new income and circumstances for continued eligibility with income over 130%. The CWD must not discontinue the household based on a verbal statement of income over IRT.</p> <p>If the household provides the required verification, the CWD must act on the change appropriately.</p> <p>If verification of the new income over IRT is not provided, discontinue the case for failure to provide verification at the end of the month in which timely and adequate notice can be provided.</p> <p>If the CWD attempts to contact the household and is unsuccessful, then, the CWD must evaluate the information to determine if it meets the unclear information rules in accordance with ACL No. 18-20 issued on February 28, 2018. If yes, follow unclear information procedures. If no, document the attempt to contact the household in the</p>		

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)?
			case record and send the household a No-Change NOA.		
Income: Increase Over \$50 but Below 130% FPL for households certified at 130% FPL or below	Voluntary	Household reports an increase in gross monthly income below 130% FPL. Household may have provided verification.	If the change would result in a decrease in benefits, do not request verification, send the household a No-Change NOA, and document the information in the case record and follow-up at the next SAR 7 or recertification, whichever comes first. Even if the household provided verification along with the reported change, the CWD must not act on the information.	No	No
Income: Increase Over IRT of 130% FPL (for households certified at 130% FPL or below)	Mandatory Households are required to report, within 10 days, when gross monthly income	Household reports that gross monthly income received increased over IRT and new income is reasonably anticipated to continue for at least one month beyond the month	If the household is under 200% and MCE, request verification of new income (if applicable) and redetermine ongoing eligibility. Once income is verified, decrease benefits at the end of the month in which timely and adequate notice can be provided. If the household is non-MCE, and provided verification of income over IRT, discontinue at the end of the	Yes, to redetermine ongoing eligibility.	No

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)?
	received exceeds the IRT.	in which the change is reported.	<p>month in which timely and adequate notice can be provided. If verification was not provided, request income via a CW 2200.</p> <p>If verification of the new income is not provided, discontinue the case for failure to provide verification at the end of the month in which timely and adequate notice can be provided.</p>		
Income: Increase Over 130% FPL and Over 200% FPL (for households certified with income between 131 and 200% of FPL.)	Voluntary	Household reports that gross monthly income received increased and is over 200% FPL.	<p>This is considered a voluntary report.</p> <p>Households determined eligible with gross monthly income between 131 and 200% FPL do not have an IRT reporting requirement since they have already met their mandatory IRT reporting requirement at application.</p> <p>If the change would result in a decrease in benefits or ineligibility, do not request verification. Send the household a No-Change NOA, and document the information in the case record and follow-up at the next SAR 7 or recertification, whichever comes first. Even if the household provided verification along with the reported change, the CWD must not act on the information.</p>	No	No
Income: Increase Over 130% FPL, but at or	Voluntary	Household reports that gross monthly income received	<p>This is considered a voluntary report.</p> <p>Households determined eligible with gross monthly income between 131 and</p>	No	No

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)?
Below 200% FPL (for households certified with income between 131 and 200% of FPL.)		increased but is below 200% FPL.	<p>200% FPL do not have an IRT reporting requirement since they have already met their mandatory IRT reporting requirement at application.</p> <p>If the change would result in a decrease in benefits, do not request verification, and send the household a No-Change NOA. Document the information in the case record and follow-up at the next SAR 7 or recertification, whichever comes first. Even if the household provided verification along with the reported change, the CWD must not act on the information.</p>		
Income: Increase of over 200% FPL for an Elderly and/or Disabled (E/D) Household certified with income between 131 and 200% FPL.	Voluntary	E/D household certified with income between 131 and 200% FPL reports income over 200%FPL.	<p>This is considered a voluntary report.</p> <p>E/D households determined eligible with income between 131 and 200% FPL do not have an IRT reporting requirement since they have already met their mandatory IRT reporting requirement at application.</p> <p>If the change would result in a decrease in benefits, do not request verification, and send the household a No-Change NOA. Document the information in the case record and follow-up at the next SAR 7 or recertification, whichever comes first. Even if the household provided verification along with the reported change, the CWD must not act on the information.</p>	No	No

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)?
Information Known to the Agency	N/A	“Information Known to the Agency” pertains only to information which caused a change in eligibility or benefits for the CalWORKs and/or Medi-Cal programs. This does not include PACF changes described in this appendix.	<p>If the information provided for CalWORKs and/or Medi-Cal does not trigger action in that program, then the CWD does not act on the information for CalFresh.</p> <p>If the information provided does trigger an action for CalWORKs and/or Medi-Cal and the change would result in an increase in CalFresh benefits, the CWD must act on the information for CalFresh. However, if the information the CWD acted on for CalWORKs and/or Medi-Cal would cause a decrease to the CalFresh benefits and the information is not considered VUR or a mandatory mid-period report, then the CWD must not act to decrease the CalFresh benefits. The CWD must send the household a No-Change NOA, document the information in the case record, and follow-up at the next SAR 7 or recertification, whichever comes first.</p>	No	No
Intentional Program Violation (IPV) Report	N/A	IPV reports provide IPV information for CalFresh and CalWORKs.	Act on information mid-period only if the IPV is confirmed. A confirmed IPV means that a hearing official found that a household member committed, and intended to commit, an intentional program violation.	No	Yes
Medical expenses: Reported by the Household	Voluntary	Household makes a voluntary mid-period report of a medical expense that would	If the change would result in a decrease in benefits, do not request verification and send the household a No-Change NOA. Document the information in the case record and follow-up at the next	Yes, if applicable.	No

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)?
		allow/disallow for a medical deduction.	<p>SAR 7 or recertification, whichever comes first. Even if the household provided verification along with the reported change, the CWD must not act on the information.</p> <p>If the change would result in an increase in benefits, the CWD must send the household a CW 2200 requesting verification, if applicable, to obtain the information required to act on the change. If the household already provided verification, no need to resend the CW 2200. Once all verification/ information is obtained the CWD must act to increase benefits.</p> <p>If the household does not respond to the CW 2200 send the household a No-Change NOA, document the information in the case record and follow-up at the next SAR 7 or recertification, whichever comes first.</p>		
Medical Expenses: Reported by Third Party	Voluntary	A change in medical expenses reported by a source other than the household mid-period.	Do not request verification and do not act unless the third-party report is considered VUR.	No	Depends on the type of report.
Out-of-State EBT usage	Voluntary	The CWD discovers an EBT usage report or other third-party information that a	The CWD must attempt to contact the household by sending a CW 2200 to the household's last known address to determine if the household has moved to the other state or intends to return. If	Yes	No

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)?
		household is accessing their benefits in another state for an extended period of time.	the household does not respond, the household's benefits must be terminated for failing to respond to the CW 2200. Refer to ACL No. 15-94 issued on November 3, 2015 for additional guidance on CalFresh residency and out-of-state EBT usage.		
PACF: Grant Change	N/A	<p>A change is reported that results in a change to the household's public assistance (PA) benefits, such as CalWORKs, CAPI, and General Assistance/ General Relief. In certain instances, a PA change may also be a County Initiated Change.</p> <p>Note: This "Grant change only" type of mid-period change applies to the change in grant amount but not all other information reported for that program.</p>	<p>Act on CalFresh case, even if it results in a decrease in benefits, allowing for timely and adequate notice.</p> <p>Refer to ACL No. 21-25 issued on March 4, 2021 for more information on PACF.</p>	No	Yes

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)?
PVS Reports	N/A	Payment Verification System (PVS) reports provide benefit information from SSA and EDD.	Act on information mid-period, allowing for timely and adequate notice. Only request verification if information reported on the PVS report is unclear per guidance in ACL No. 18-20 .	No	Yes
Receipt of Substantial Lottery and/or Gambling Winnings (Not IEVS)	Mandatory	The CWD has information submitted by the household of the receipt of substantial lottery and/or gambling winnings.	<p>If the CWD receives information mid-period indicating that the household received substantial lottery and/or gambling winnings, other than from a gaming entity match, the CWD must verify the winnings, if not verified at the time the report was made, and if the dollar amount of the winnings is above the maximum allowed, must discontinue the entire household based on the receipt of the winnings at the end of the month in which timely and adequate notice can be provided.</p> <p>Per FNS direction, the household may report the information either verbally or in writing, without documentary evidence, and detailed case narration is acceptable as verification for a report of substantial winnings. For example, the case narration of the household's verbal report of the substantial winnings that includes the date, amount and source of the winnings is acceptable as verification.</p>	Yes, if at the time of the report, the household did not verify winnings and dollar amount.	No

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)?
			If at the time of the report, the household did not provide all information required to act on the change, verification of winnings and dollar amount, then the CWD must attempt to verify the information by contacting the household via telephone or sending a CW 2200. If the household does not respond, the CWD must discontinue the household for failure to provide.		
Report of Change in Student Status	Voluntary	Household reports a change in student status or a change in student exemption information (with or without verification).	<p>If the change would result in a decrease in benefits, do not request verification, send the household a No-Change NOA, and document the information in the case record to follow-up at the next recertification (student status is not a SAR reporting requirement). Even if the household provided verification along with the reported change, the CWD must not act on the information.</p> <p>If the change would result in an increase in benefits, the CWD must send the household a CW 2200 requesting verification, if applicable, to obtain the information required to act on the change. If the household already provided verification, no need to resend the CW 2200. Once all verification/information is obtained the CWD must act to increase benefits.</p>	No, if it would result in a decrease in benefits. Yes, if verification is needed to act on a change that would cause an increase in benefits.	No

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)?
			<p>If the household does not respond to the CW 2200 send the household a No-Change NOA, document the information in the case record and follow-up at the next SAR 7 or recertification, whichever comes first</p> <p>Note, depending on the type of exemption, CWDs are reminded to follow mid-period rules for the type of reported change. For example, if the reported change is income, the CWD must also follow mid-period income rules. Additionally, if the household reports a new student exemption for an excluded student, the CWD must follow mid-period household composition change rules. Refer to ACL No. 24-31 issued on May 3, 2024, for additional guidance on CalFresh Student Eligibility.</p>		
Report of Fleeing Felon	N/A	Federal regulations make any individual found to be a fleeing felon or in violation of a condition of probation or parole imposed under a federal or state law ineligible for CalFresh.	<p>Take action to remove the individual from the CalFresh household. If the change results in a decrease in benefits make the change at the end of the month in which timely and adequate notice can be provided.</p> <p>Refer to ACL No.15-82 issued on October 14, 2015 for further guidance and details on the definition of fleeing felon or a probation or parole violator.</p>	No	No

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)?
Request to Close Case	Voluntary	Household requests to close CalFresh case.	<p>If request is from the head of household, a responsible adult household member, or Authorized Representative, the request is actionable and requires no further verification.</p> <p>If request is made verbally, discontinue the case at the end of the month in which timely and adequate notice can be provided. If the request is made in writing or in the presence of an eligibility worker, only adequate notice is required.</p>	No	No
Shelter Expense Change	Voluntary	Household voluntarily reports a change in shelter expense.	<p>As of September 1, 2019, shelter costs must not be verified, unless questionable. However, if the household does not provide information about the amount of the new shelter costs at the time they report the change, send the household a CW 2200 to request new shelter cost information. If the household does not respond to the CW 2200, send the household a No-Change NOA, document the information in the case record and follow-up at the next SAR 7 or recertification, whichever comes first. The household may contact the CWD anytime to provide updated information.</p> <p>Once the CWD has been informed of the new shelter costs the CWD must</p>	No	No

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)?
			<p>recalculate the household's budget and act accordingly to the change.</p> <p>If all information/verification is provided, and the change would result in a decrease in benefits send the household a No-Change NOA and document the information in the case record to follow-up at the next {SAR7 or} recertification, whichever comes first.</p> <p>If the change would result in an increase in benefits, the CWD must act to increase the household's benefits.</p>		
Third-Party Reports	N/A	A change reported mid-period by a source other than the household.	Unless the third-party report is considered VUR, do not request verification and do not act. An example of a third-party report considered VUR is a PVS match reporting EDD wage information.	No	Depends on the type of report.
Unclear Information	N/A	The CWD may receive unclear information about a household's circumstances from which the CWD cannot readily determine the effect on the household's continued eligibility or benefit amounts. The	<p>Pursue verification only if unclear information received outside the periodic report is: fewer than 60 days old relative to the current month of participation (the first day of the month in which the information was received), and would, if accurate, have been required to be reported. "Required to be reported" means that the household may have missed a mandatory report.</p> <p>Additionally, the CWD must also act when information received significantly</p>	If applicable	Not typically but depends on the type of report.

Type of Change	Reporting Required?	Description	Action	Verification Required?	Verified Upon Receipt (VUR)?
		<p>CWD may receive such unclear information from a third party.</p> <p>Unclear information may be information that is VUR, but is unclear because the CWD needs additional information to act on the change appropriately.</p>	<p>conflicts with information used by the CWD at the time of initial certification or recertification.</p> <p>If CWD follow up is required and the household does not respond to the request for information or responds but refuses to provide verification by the specified date, the CWD must send the household a timely and adequate discontinuance NOA with information that explains the reason for action. If the household responds to the CW 2200 request and provides information/verification, the CWD must evaluate whether the information is a mandatory mid-period report or VUR. If the information is not a mandatory mid-period report nor VUR, then the CWD must only act on the information/verification if it results in an increase.</p> <p>Refer to ACL 18-20 for additional guidance on “unclear information”.</p>		

ABAWD: Able-Bodied Adult Without Dependents

COLA: Cost of Living Adjustment

CW: CalWORKs

CWD: County Welfare Department

E/D: Elderly/Disabled

EDD: Employment Development Department

FNS:

FPL: Federal Poverty Limit

IEVS: Income and Eligibility Verification System
IPV: Intentional Program Violation
IRT: Income Reporting Threshold
MCE: Modified Categorically Eligible
NOA: Notice of Action
PA: Public Assistance
PACF: Public Assistance CalFresh
PVS: Payment Verification System
SAR: Semi-annual Report
SSA:
USPS: United States Postal Service
VUR: Verified Upon Receipt