

January 22, 2021

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

**EXECUTIVE SUMMARY**

**ALL COUNTY LETTER NO. 21-11**

This All County Letter (ACL) provides guidance to County Welfare Departments (CWDs) regarding The Consolidated Appropriations Act, 2021 as it relates to students of higher education and their eligibility for CalFresh. The Act introduces two temporary changes to the CalFresh student eligibility rule to expand eligibility to students who are eligible for federal or state work study or who have an Expected Family Contribution of zero dollars.



KIM JOHNSON  
DIRECTOR

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

January 22, 2021

ALL COUNTY LETTER NO. 21-11

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

SUBJECT: CALFRESH STUDENT ELIGIBILITY: COVID-19 RELIEF  
PACKAGE

REFERENCE: [TITLE 7 CODE OF FEDERAL REGULATIONS \(CFR\) SECTION 273.5](#); [MANUAL OF POLICY AND PROCEDURES DIVISION 63, SECTION 63-406](#); [ALL COUNTY LETTER \(ACL\) 20-08](#); [ACL 20-114](#); [ACL 17-05](#); [WELFARE AND INSTITUTIONS CODE 18901.11](#); [CONSOLIDATED APPROPRIATIONS ACT, 2021](#); [20 UNITED STATES CODE 1087kk](#)

This All County Letter (ACL) provides guidance to County Welfare Departments (CWDs) regarding [Consolidated Appropriations Act, 2021](#) as it relates to students of higher education and their eligibility for CalFresh. The Act introduces two temporary changes to the CalFresh student eligibility rule to expand eligibility to students who are eligible for federal or state work study or who have an Expected Family Contribution (EFC) of zero dollars.

## **BACKGROUND**

### *Student Eligibility Rule*

In accordance with [7 CFR Section 273.5\(a\)](#) and [Manual of Policies and Procedures \(MPP\) Section 63-406.11](#), a student is defined as any person who is age 18 through 49; physically and mentally fit for employment; and enrolled at least half-time, as defined by the institution, at an institution of higher education. A student must be determined ineligible to participate in CalFresh unless the student meets the criteria for at least one of the exemptions specified at [7 CFR Section 273.5\(b\)](#). This is known as the “student eligibility rule.”

### *Work Study*

Federal regulations at [7 CFR 273.5\(b\)\(6\)\(i\)-\(ii\)](#) and [MPP 63-406.212](#) allow participation in work study to serve as an exemption from the CalFresh student eligibility rule. To qualify under this provision, the student must be approved for work study and anticipate working during the approved term(s). The Student Eligibility Handbook ([ACL No. 20-08](#)) provides further details about this and other existing exemptions from the student eligibility rule.

[ACL No. 20-114](#) recently introduced a standardized form and letter to be used by community colleges and universities to verify that a student is approved for state or federal work study. This form and letter are acceptable forms of verification that a student meets an exemption from the student eligibility rule.

### *Expected Family Contribution of Zero Dollars*

The EFC is calculated from information submitted on the Free Application for Federal Student Aid (FAFSA) or the California Dream Act Application. The EFC is based on federal rules dictated by part F of Title IV of the Higher Education Act of 1955 ([20 U.S.C. 1087kk et seq.](#)). In California, the California Student Aid Commission (CSAC) determines who has a zero dollar EFC.

## **Temporary waiver to the Student Eligibility Rule**

The [Consolidated Appropriations Act, 2021](#) authorizes temporary changes to the student eligibility rule to expand student eligibility at Section 6(e) of the Food and Nutrition Act of 2018, as amended to include students enrolled at least half-time in an institution of higher education, who either:

- Are **eligible** to participate in state or federally financed work study during the regular school year, as determined by the institution of higher education, or
- Have an EFC of zero dollars in the current academic year determined in accordance with part F of title IV of the Higher Education Act of 1965.

### *Work Study*

The [Consolidated Appropriations Act, 2021](#) temporarily expands eligibility to students who are **eligible** for state or federally financed work study as defined by the institution of higher education. Unlike under regular CalFresh rules, it is no longer required that a student be **approved for work study and anticipate** working during the approved term(s).

### *Expected Family Contribution of Zero Dollars*

The [Consolidated Appropriations Act, 2021](#) temporarily expands eligibility to students who are determined by CSAC to have a zero dollar EFC for the current school year.

This is an entirely new provision as there is normally no exemption from the student eligibility rule related to the EFC.

### **VERIFICATION OF TEMPORARY WAIVER FOR EXEMPTIONS**

#### *Work Study*

Verification of work study approval may include, but is not limited to, a letter from the financial aid office or a completed work study verification form confirming work study eligibility.

CDSS has temporarily altered the Work Study Verification Letter and Form to reflect the temporary change and referencing “eligibility” for work study. Please see Appendix A and B for samples. When feasible, financial aid offices will send the verification letter directly to students eligible for work study or make it available on their student portals. Students who do not receive a letter, but who are eligible for work study, may obtain verification directly from their financial aid office by using the Temporary Work Study Verification Form. The Temporary Work Study Verification Form may be made available to students at the financial aid office or online to print or download in order to obtain verification of eligibility for work study from their financial aid offices. A sample of The Temporary Work Study Verification Letter and Form can be found on the [CalFresh Resource Center: Policy Guidance](#) webpage under the Student Resources section.

#### *Expected Family Contribution of Zero Dollars*

Verification of a zero dollar EFC may include, but is not limited to, a letter from CSAC confirming a zero dollar EFC for the current school year, a student’s Student Aid Report (SAR), or a financial aid offer letter. These written notifications serve as acceptable verification that a student meets the temporary EFC exemption from the student eligibility rule.

As part of the state’s outreach efforts, CSAC will be sending all students with a zero dollar EFC for the current school year a letter confirming this and informing them of the temporary change and their potential eligibility for CalFresh. CDSS will share a sample letter with CWDs as soon as administratively feasible.

A copy of each student’s SAR is available online for those students who list an email address on the FAFSA ([sample SAR](#)). The EFC is listed on page one (1) of the SAR, directly under the Social Security number.

### **TRACKING THE EXEMPTION & CASE COMMENTS**

When approving a student for CalFresh due to either of these temporary changes, the eligibility worker will apply a “Work Study Exemption” to the applicable CalFresh

individual(s) and include the following language as a case narration, “student meets temporary exemption to the student eligibility rule due to COVID-19 public health emergency.” This will allow case reviewers to determine that all CalFresh requirements have been met under the Consolidated Appropriations Act authority.

### **TIME PERIOD FOR THE TEMPORARY CHANGES**

The temporary student eligibility standard must be in effect for initial CalFresh applications until 30 days after the COVID-19 public health emergency is lifted at the federal level. During this period, existing CalFresh households may also add a new member to the household if the individual, if not for this temporary change, would have been previously excluded due to the student eligibility rule. The emergency is defined by the Secretary of Health and Human Services under section 319 of the Public Health Service Act based on an outbreak of COVID-19.

The temporary student eligibility standard will remain in effect at the individual level until the first recertification of a household beginning no earlier than 30 days after the COVID-19 public health emergency is lifted. While the temporary student eligibility standard is in effect, student status must not be reassessed mid-period or at periodic report (i.e. SAR 7). This applies even if the public health emergency is lifted during the student’s certification period.

### **QUALITY CONTROL IMPACT**

When approving a student for CalFresh under these temporary changes, adequate case narration is essential. Case narration, including a reference to “COVID-19 public health emergency,” will allow case reviewers to determine that all CalFresh requirements have been met under the Consolidated Appropriations Act authority.

### **OUTREACH EFFORTS**

California’s institutions of higher education will be conducting outreach to students to inform them of these temporary changes. CDSS will share more about these efforts as information is available.

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If you have any questions or need additional guidance regarding the information in this letter, contact the CalFresh Policy Bureau at [CalFreshPolicy@dss.ca.gov](mailto:CalFreshPolicy@dss.ca.gov).

Sincerely,

***Original Document Signed By:***

JENNIFER HERNANDEZ  
Deputy Director  
Family Engagement and Empowerment Division

Attachments

**Student Name:**  
**Student ID:**

**Date:**

**SUBJECT: TEMPORARY EXPANSION OF CALFRESH ELIGIBILITY FOR STUDENTS DUE TO COVID-19**

Because of the COVID-19 pandemic emergency, eligibility for CalFresh food benefits has been temporarily expanded to college students who are eligible for work study. The [Fill in college name], Office of Financial Aid, has confirmed that you are eligible for work study during the [Fill in academic school year/specific school term(s)] term. Based on your work study eligibility, you may be eligible for CalFresh benefits. This change is effective until the COVID-19 pandemic emergency is over.

CalFresh is money for food that comes on an Electronic Benefit Transfer (EBT) card, which works like a debit card. It can help you pay for groceries while you are in college. We encourage you to apply for CalFresh to make your college expenses more affordable.

**Step 1:** Apply for CalFresh at [www.getcalfresh.org/students](http://www.getcalfresh.org/students) or call 1-877-847-3663.

**Step 2:** Upload a copy of this letter with your application or give a copy to your county or CalFresh worker.

Sincerely,

[Insert signature and signature block including a contact number for county workers to call]

**Attention County Social Services Partners:** This letter serves as acceptable verification that the student listed above is eligible for work study and may be exempt from the CalFresh student eligibility rule. Students who are eligible for work study are exempt from the student eligibility rule per the Consolidated Appropriations Act, 2021. This applies to all eligible work study positions whether on campus, remote, or off campus.

## VERIFICATION OF TEMPORARY CALFRESH ELIGIBILITY BECAUSE OF COVID-19

Because of the COVID-19 pandemic emergency, eligibility for CalFresh food benefits has been temporarily expanded to college students who are eligible for work study. This change is effective until the COVID-19 pandemic emergency is over.

**Step 1:** Fill out this form.

**Step 2:** Obtain signature below.

**Step 3:** Apply for CalFresh at [www.getcalfresh.org/students](http://www.getcalfresh.org/students) or call 1-877-847-3663.

**Step 4:** Upload a copy of this form with your application or give a copy to your county or CalFresh worker.

Student Name (First and Last)

Student ID Number

School Name

City

**This form may be used to determine if the student can get CalFresh food benefits.**

### To be Completed by School:

#### 1. Enrollment Status (check one):

☐ Half-time or more

☐ Less Than Half-Time

#### 2. Eligible for Work Study (check one):

This student is eligible for a federal or state work study program for the following:

☐ Academic School Year: \_\_\_\_\_

☐ Specific School Term(s): \_\_\_\_\_

Signature of School Official

Date

Print Name

Title

Phone Number

**Attention County Social Services Partners:** This letter serves as acceptable verification that the student listed above is eligible for work study and may be exempt from the CalFresh student eligibility rule. Students who are eligible for work study are exempt from the student eligibility rule per the Consolidated Appropriations Act, 2021. This applies to all eligible work study positions whether on campus, remote, or off campus.