

March 4, 2021

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

**EXECUTIVE SUMMARY**

**ALL COUNTY LETTER NO. 21-25**

The purpose of this All County Letter is to provide County Welfare Departments with general guidance regarding the definition of a Public Assistance CalFresh (PACF) household along with instructions for accurate budgeting and reporting based on the new definition.



KIM JOHNSON  
DIRECTOR

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

March 4, 2021

ALL COUNTY LETTER (ACL) NO. 21-25

TO: ALL COUNTY WELFARE DIRECTORS  
ALL CALFRESH PROGRAM SPECIALISTS  
ALL CALWORKS PROGRAM SPECIALISTS  
ALL TRIBAL TANF PROGRAM CONTACTS  
ALL CASH ASSISTANCE PROGRAM FOR IMMIGRANTS (CAPI) MANAGERS  
ALL IN-HOME SUPPORTIVE SERVICES (IHSS) MANAGERS  
ALL CONSORTIA PROJECT MANAGERS  
ALL QUALITY CONTROL PROGRAM COORDINATORS

SUBJECT: CALFRESH GUIDANCE ON NEW DEFINITION OF PUBLIC ASSISTANCE CALFRESH (PACF)

REFERENCE: [TITLE 7 CODE OF FEDERAL REGULATIONS \(CFR\) 273.2\(j\); 7 CFR § 273.2\(j\)\(2\); 7 CFR § 273.2\(k\); 7 CFR § 273.9\(a\); 7 CFR 273.9\(b\)\(2\)\(i\); 7 CFR 273.9\(b\)\(5\)\(ii\); 7 CFR § 273.9\(d\)\(4\); 7 CFR 273.10\(f\)\(2\); MANUAL OF POLICIES AND PROCEDURES \(MPP\) SECTION 63-506\(b\); ALL COUNTY LETTER \(ACL\) 03-49; ACL 11-05; ACL 11-05E; ACL 14-49; ACL 14-56; ACL 14-56E; ACL 16-39E2; ACL 16-112; ACL 17-09; ACL 17-34; ACL 17-35; ACL 18-90; ACL 18-90E; ACL 18-91; ACL 18-92; and ACL 19-59](#)

The purpose of this letter is to provide County Welfare Departments (CWDs) with general guidance regarding the definition of a Public Assistance CalFresh (PACF) household along with instructions for accurate budgeting and reporting based on the new definition.

## Background

As a result of the expansion of CalFresh to Supplemental Security Income and/or California State Supplementary Payment (SSI/SSP) recipients in June 2019, newly eligible CalFresh households comprised only of SSI/SSP recipients (hereafter 'PACF

SSI-Only households') were inadvertently categorized generally as PACF households without regard for the impacts on budgeting, reporting, and program eligibility.

Because of this inadvertent categorization, the *Food Stamp Program Participation and Benefit Issuances Report* (DFA 256) does not report the number of PACF households by public assistance program type. The accurate categorization and subsequent accurate reporting of PACF households in which all members are CalWORKs recipients are essential to state budgeting and cost allocation methodologies and to meet program-specific data reporting requirements. Without establishing a new definition of a PACF household, the California Department of Social Services (CDSS) is unable to determine the number of PACF households by program type.

The CDSS has developed a new PACF definition that distinguishes CalFresh households by public assistance program type and supports California's continued alignment with federal reporting expectations. This letter provides the new definition and instructions for accurate budgeting and reporting.

### **New Definition of a PACF Household**

The new definition of a PACF household broadly defines a PACF household as a CalFresh household in which members receive some type of public assistance in addition to CalFresh, including CalWORKs, Tribal Temporary Assistance for Needy Families (TANF), SSI/SSP, and General Assistance/General Relief (GA/GR). The term PACF functions as an umbrella term under which specific subcategories of PACF households fall.

Under the umbrella category of PACF household, the CDSS has established six subcategories based on the public assistance benefits received by each household member. These PACF household subcategories and definitions are provided below:

- PACF CalWORKs-Only Household: a CalFresh household in which all included members also receive CalWORKs cash benefits.
- PACF Tribal TANF-Only Household: a CalFresh household in which all included members also receive Tribal TANF cash benefits.
- PACF SSI/SSP-Only Household: a CalFresh household in which all included members also receive SSI and/or SSP benefits.
- PACF GA/GR-Only Household: a CalFresh household in which all included members also receive GA/GR benefits.

- PACF Multiple PA: a CalFresh household in which all included members receive public assistance from any combination of the previously mentioned public assistance program types (i.e., CalWORKs, Tribal TANF, SSI/SSP, and/or GA/GR).
- PACF Mixed: a CalFresh household in which one or more included members receive public assistance from any combination of the previously mentioned public assistance program types (i.e., CalWORKs, Tribal TANF, SSI/SSP and/or GA/GR) and one or more included members receive only CalFresh.

### **Impact of Program Sanctions**

Household members who are either sanctioned or excluded from the CalFresh household for another reason will affect whether a household is defined as a PACF household and under which subcategory the household must be placed. A household member who is sanctioned, depending on the type of sanction, may not be considered a CalFresh recipient or public assistance recipient during the time period of the sanction.

The following examples are provided for further clarification but are not intended as an exhaustive list of possible scenarios.

#### **CalWORKs and Concurrent CalFresh Sanction Example**

A four-person CalFresh household consists of two included CalWORKs recipient members, and two included SSI/SSP recipient members. This household is defined as PACF Multiple PA. If one of the CalFresh household members who is also a CalWORKs recipient is sanctioned due to refusal to cooperate with Welfare to Work requirements and a concurrent CalFresh sanction is applied, that individual must not be considered a CalFresh or CalWORKs recipient during the time period of the sanction. In this scenario, because all of the remaining household members continue to receive CalFresh and public assistance, the household remains a PACF Multiple PA household during the time period of the sanction.

If the concurrent CalFresh sanction is lifted *before* the CalWORKs sanction is lifted, then the individual would only be considered a CalFresh recipient during the time period that the CalWORKs sanction continues to be imposed. In this scenario, the household is a four-person CalFresh household consisting of one CalFresh-only member, one CalWORKs recipient member, and two SSI/SSP recipient members. Therefore, the household is a PACF Mixed household because some household members continue to receive CalFresh and public assistance and one member receives only CalFresh.

When the CalWORKs sanction is lifted, all members will once again be considered recipients of both CalFresh and public assistance and the household will again be considered a PACF Multiple PA household.

### CalFresh Sanction Example

A three-person CalFresh household consists of two included SSI/SSP recipient members and one included GA/GR recipient member. This household is defined as PACF Multiple PA. If the household member who is also a GA/GR recipient is sanctioned due to refusal to cooperate with CalFresh work registration requirements, voluntarily quitting a job, or reducing hours worked to less than 30 per month, that individual must not be considered a CalFresh recipient during the time period of the sanction. In this scenario, because all of the remaining household members continue to receive CalFresh and public assistance, specifically SSI/SSP, the household must be considered a PACF SSI/SSP-Only household during the time period of the sanction.

When the CalFresh sanction is lifted, all members will once again be considered recipients of both CalFresh and public assistance and the household will again be considered a PACF Multiple PA household.

### **Impact on County Cost Allocation Methodologies**

The Fiscal Forecasting and Policy Branch will release a County Fiscal Letter (CFL), subject to the availability of the appropriate data, that will provide updated claiming instructions that reflect the new PACF subcategories and the cost allocation associated with them.

### **Impact on County Reports, Forms, and Notices**

The Research, Automation, and Data Division (RADD) have identified several CalFresh data reports that will be updated to reflect the new PACF household definition and subcategories. Reports impacted by this change include:

- CF 296 – CalFresh Monthly Caseload
- CF 358F – CalFresh Participants by Race/Ethnicity - Federal-Only and Combined Households
- CF 358S – CalFresh Participants by Race/Ethnicity - State-Only Households
- DFA 256 – Food Stamp Program Participation and Benefit Issuances

A combined ACL will be released with the updated forms, instructions, and validations for all the reports listed above. Please continue to complete the report as previously instructed in [ACL 16-39E2](#) released August 14, 2017, for the CF 296, [ACL 19-59](#)

released July 10, 2019, for the CF 358F and CF 358S, and [ACL 03-49](#) released September 29, 2003, for the DFA 256 until further notice.

### **Impact on CalFresh Program Eligibility**

In addition to impacting budgeting and reporting, the PACF household definition and subcategories have impacts on CalFresh eligibility. PACF CalWORKs-Only, Tribal TANF-Only, PACF SSI-Only, and GA/GR-Only households are subject to unique CalFresh eligibility rules. Specifically, PACF CalWORKs-Only, Tribal TANF-Only, and PACF SSI/SSP-Only, and GA/GR-Only households are all considered categorically eligible for the purpose of determining CalFresh eligibility per [7 CFR § 273.2\(j\)\(1\) and 7 CFR § 273.2\(j\)\(2\)](#). Also, households with only SSI/SSP applicant or recipient members may apply for CalFresh under Social Security Administration (SSA) Joint Processing rules (see [7 CFR § 273.2\(k\)](#) and [ACL 19-44](#) released May 9, 2019).

### **Automation Implications and Implementation**

To effectively implement this new definition of a PACF household, the Statewide Automated Welfare System (SAWS) will develop and implement new automated functionality. This functionality will allow CWDs and the CDSS to pull several new data elements from the SAWS. These new data elements are listed below.

Using these new data elements, the CDSS RADD will compile a monthly count of households and persons in the above-mentioned PACF subcategories by county. This monthly count will use a methodology similar to the core programming logic used to populate the DFA 256. The SAWS will also develop a monthly person count to include the entire CalFresh caseload, regardless of the household's PACF categorization. These person counts will be utilized to provide more accurate reporting, cost allocation, and budgeting related to CalFresh households that include members receiving multiple types of public assistance.

The SAWS will have the following data elements available in the system for the CWD and state data inquiries.

#### **PACF CASELOAD COUNTS**

- PACF CalWORKs-Only
- PACF SSI/SSP-Only
- PACF GA/GR-Only
- PACF Tribal TANF-Only
- PACF Multiple PA
- PACF Mixed

#### SUBSET DATA

- PACF Multiple PA:
  - Caseload count of households which include members who receive CalWORKs and SSI/SSP
- PACF Mixed:
  - Caseload count of households which include members who receive CalWORKs and SSI/SSP

#### PACF PERSON COUNTS

- PACF CalWORKs-Only
- PACF SSI/SSP-Only
- PACF GA/GR-Only
- PACF Tribal TANF-Only
- PACF Multiple PA
- PACF Mixed

There is no need to request new aid codes from the Medi-Cal Eligibility Data System (MEDS) since it was determined that these data elements and categories are available in the SAWS.

#### SAWS PACF Indicator

To facilitate the effective and accurate implementation of CalFresh eligibility policy, the SAWS will also provide an indicator for eligibility workers (EWs) that will identify the CalFresh household and household member's information by the PACF subcategories. The indicator will be displayed prominently on the case summary page.

#### SAWS Implementation

Automation of PACF subcategory data elements and the PA indicator will occur as soon as administratively possible.

For CalFresh program questions or inquiries related to this ACL, please contact the CalFresh Policy and Employment Bureau at [CalFreshPolicy@dss.ca.gov](mailto:CalFreshPolicy@dss.ca.gov).

For fiscal questions or inquiries related to this ACL, please direct them to the Fiscal Policy and Analysis Bureau at [fiscal.systems@dss.ca.gov](mailto:fiscal.systems@dss.ca.gov).

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For county data reporting questions or inquiries related to this ACL, please contact the Research, Automation, and Data Division at (916) 653-1800.

Sincerely,

**Original Document Signed By**

JENNIFER HERNANDEZ  
Deputy Director  
Family Engagement and Empowerment Division