

June 28, 2024

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

EXECUTIVE SUMMARY

ALL COUNTY LETTER NO. 24-47

The purpose of this All County Letter is to provide County Welfare Departments with guidance regarding the approval of a CalFresh waiver for alternate procedures when a change of address is reported.



KIM JOHNSON
DIRECTOR

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



GAVIN NEWSOM
GOVERNOR

June 28, 2024

ALL COUNTY LETTER NO. 24-47

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

SUBJECT: CALFRESH WAIVER TO ALTERNATE PROCEDURES WHEN
CHANGE OF ADDRESS IS REPORTED

REFERENCE: [TITLE 7 CODE OF FEDERAL REGULATIONS \(CFR\) 272.3\(c\)\(1\)\(i\); 7 CFR 273.12\(c\)\(3\); 7 CFR 273.12\(c\)\(3\)\(i\)\(B\); 7 CFR 273.12\(c\)\(4\)\(i\); UNITED STATES DEPARTMENT OF AGRICULTURE \(USDA\) FOOD AND NUTRITION \(FNS\) MEMO - SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM \(SNAP\) – ALTER PROCEDURES WHEN CHANGE OF ADDRESS IS REPORTED ADMINISTRATIVE WAIVER DATED MAY 29, 2024; ALL COUNTY WELFARE DIRECTORS LETTER \(ACWDL\) MARCH 28, 2023](#)

The purpose of this All County Letter (ACL) is to provide County Welfare Departments (CWDs) with guidance regarding the extension of CalFresh waiver authority requested by the California Department of Social Services (CDSS) and approved by the United States Department of Agriculture, Food and Nutrition Service (FNS) to implement alternate procedures when a change of address is reported.

WAIVER APPROVAL

This waiver extension, a copy of which is attached, has been **approved effective July 1, 2024, through June 30, 2026**, unless otherwise communicated by CDSS:

For detailed guidance on implementation of this waiver, refer to the [ACWDL issued March 28, 2023](#).

REPORTING REQUIREMENT

As a condition of this extension, CDSS must provide data on the number of households affected by this waiver. To fulfill this reporting requirement, CDSS will develop an electronic survey that must be completed by all counties. The electronic survey will request the following information from CWDs:

- Estimated number of households affected by the waiver.
- Any issues associated with the waiver, including the number of client complaints received (verbal or written).
- A narrative explaining the impact of the change of address waiver on the number of errors and payment accuracy, with supporting data if available.

If you have questions or need additional guidance regarding the information in this letter, contact the CalFresh Policy and Employment Bureau at CalFreshPolicy@dss.ca.gov.

Sincerely,

Original Document Signed By

ALEXIS FERNÁNDEZ GARCIA
Deputy Director
Family Engagement and Empowerment Division

Attachment



Food and Nutrition Service

U.S. DEPARTMENT OF AGRICULTURE

June 25, 2024

Andrea Brayboy
Branch Chief
CalFresh and Nutrition Branch
Department of Social Services
744 P Street
Sacramento, California 95814

**RE: Supplemental Nutrition Assistance Program (SNAP) – California Request to
Alter Procedures When Change of Address is Reported – Initial – Approval**

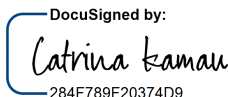
Dear Branch Chief Brayboy:

This letter transmits the approval of the California Department of Social Services' request to waive Supplemental Nutrition Assistance Program (SNAP) regulations at 7 CFR 273.12(c)(4)(i) and (iv). Under this waiver, the State agency may use alternate procedures when a household updates their address and does not provide updated shelter costs to streamline operations between SNAP and Medicaid.

The Food and Nutrition Service (FNS) is approving this waiver for a period of two years, effective July 1, 2024, through June 30, 2026. The approval is contingent upon the State agency's compliance with the waiver conditions item 9 of the Enclosure. The detailed waiver response is enclosed. If the State would like to extend the approval, an extension request must be submitted to the Regional Office 60 days (May 1, 2026) prior to the expiration date.

If you have questions or need additional information regarding this waiver, please contact your Regional Office representative.

Sincerely,

DocuSigned by:

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Catrina L. Kamau
Chief
Certification Policy Branch
Program Development Division

Enclosure

Enclosure

**ALTER PROCEDURES WHEN CHANGE OF ADDRESS IS REPORTED
WAIVER RESPONSE**

- 1. Type of request:** Initial
- 2. Regulatory citation:** 7 CFR 273.12(c)(4)(i) and (iv)
- 3. State:** California
- 4. Region:** Western
- 5. Regulatory requirements:** Supplemental Nutrition Assistance Program (SNAP) regulations at 7 CFR 273.12(c)(4)(i) and (iv) require State agencies to investigate and act on potential changes in shelter costs when a household reports a change of address. When the State agency receives a verified change in address from the household or otherwise but does not receive a corresponding update to shelter costs, the State agency must send a notice to the household asking for updated shelter cost information. This notice must also inform the household that the State agency will recalculate their allotment without the deduction if the household does not provide the updated shelter costs within 10 days. The notice should also inform the household that they can report changes in shelter costs at any time.
- 6. Description of alternative procedures:** When the State agency receives a verified change in address during a household's certification period but does not receive their updated shelter costs, the State agency must send a notice encouraging the household to report any changes in shelter costs. The State must update the case with the new shelter costs if the household responds with the updated shelter cost information. If the household does not respond to the notice, the State agency will update the address but make no change to the household's shelter cost information at that time. The State agency must follow up on shelter costs changes at the next recertification or periodic report, whichever is sooner. If the household provides the updated shelter cost information at any time, the State must update the case.

If the State agency receives change of address information that is questionable or unclear, the State agency must follow the requirements at 7 CFR 273.12(c)(3) to determine next steps. This waiver does not allow the State agency to waive unclear information procedures and act on questionable, unclear, or unverified address change information.

State-specific alternative procedures: N/A

- 7. Action and reason for approval or denial:** The Food and Nutrition Service (FNS) recognizes the need for State agency measures for effective and efficient program management. FNS is approving this waiver for period of two years, effective July 1, 2024, through June 30, 2026.
- 8. Regulatory or legislative basis for action:** Approval is based on 7 CFR 272.3(c)(1)(ii), which allows FNS to approve waivers that would result in a more effective and efficient administration of the program.
- 9. Conditions and reasons:** Approval is contingent on the following conditions:
- The State agency must send a notice encouraging the household to provide the updated shelter costs;
 - The State agency must update the excess shelter deduction if the household reports updated shelter costs;
 - The State agency updates shelter costs at the household's next recertification or periodic report, whichever comes sooner;
 - When the address change information is unclear, the State agency must follow unclear information regulations at 7 CFR 273.12(c)(3) before acting on the information; and
 - The State agency submits the required data at extension. The data shall include:
 - Estimated number of households affected by this waiver;
 - A 3-5 sentence narrative explaining the impact of the waiver on the number of errors and payment accuracy. The State agency should include any supporting data if available; and
 - Any issues associated with this waiver, including the number of client complaints (verbal or written).
- 10. Information required for extension:** If the State agency wishes to extend the waiver beyond the approved length period, the State agency must provide FNS with a signed extension request and any required data. FNS will not process an extension request until the State complies with the data requirements in their previous approval. FNS will consider an extension of this waiver based on the outcomes of the waiver and if the evaluation does not indicate a negative effect on program access or program integrity among the households subject to the waiver.
- The State must submit waiver extension requests to the Regional Office 60 days prior to the expiration date (May 1, 2026).
- 11. Expiration date:** June 30, 2026

12. Limitation(s) on approval: Approval is limited to the California Department of Social Services. The State agency is limited to the alternative procedures in this approval. The State agency must submit a modification request for FNS approval prior to making any changes to these approved procedures. The State agency must also notify FNS if it encounters issues or delays in implementation.

13. Quality control (QC) procedures: No special QC procedures are required for cases subject to the provisions of this waiver. Cases should be reviewed using the standard review procedures, modifying any eligibility requirements according to the terms and conditions of the waiver, and following the requirements for verification and documentation as contained in the FNS Handbook 310 to include documenting the QC review record with the certification waiver name or description and the period for which the applicable waiver was in effect, or when an approved waiver has been terminated or withdrawn as it pertains to the case under review.

14. Date of State agency's request: June 7, 2024

15. Anticipated implementation date (*notify FNS if actual date differs*): July 1, 2024

16. State agency contact:

Name: Yazmin Saenz

Email: Yazmin.Saenz@dss.ca.gov

17. FNS Regional Contact:

Name: Kathryn Mueller

Email: Kathryn.Mueller@usda.gov