

August 23, 2024

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

EXECUTIVE SUMMARY

ALL COUNTY LETTER NO. 24-57

The purpose of this All-County Letter is to provide guidance on how to evaluate Guaranteed Income when determining eligibility for the Cash Assistance Program for Immigrants.



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DIRECTOR

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GOVERNOR

August 23, 2024

ALL COUNTY LETTER NO. 24-57

TO: ALL COUNTY WELFARE DIRECTORS
ALL CASH ASSISTANCE PROGRAM FOR IMMIGRANTS'
MANAGERS

SUBJECT: HOW TO EVALUATE GUARANTEED INCOME IN THE CASH
ASSISTANCE PROGRAM FOR IMMIGRANTS

REFERENCE: [WELFARE AND INSTITUTIONS CODE \(WIC\) 18997](#);
[ALL COUNTY WELFARE DIRECTORS LETTER \(ACWDL\) DATED
JULY 21, 2023](#); [MANUAL OF POLICIES AND PROCEDURES
49-035](#); [PROGRAM OPERATIONS MANUAL SYSTEM
SI 00830.175](#).

The purpose of this All-County Letter (ACL) is to provide guidance on how to evaluate Guaranteed Income (GI) when determining eligibility for the Cash Assistance Program for Immigrants (CAPI).

BACKGROUND

Per CAPI eligibility requirements, an individual's or couple's countable income must be lower than the appropriate CAPI payment standard (Manual of Policies and Procedures [\(MPP\) 49-035.1](#)). Countable income means the amount that is left after subtracting any exclusions or disregarded amounts from an individual's gross income, plus that of a spouse or ineligible parent living in the same household [\(MPP 49-035.11\)](#). Accordingly, evaluating income from a GI program is critical for accurate determination of CAPI eligibility.

POLICY ON HOW TO EVALUATE STATE FUNDED GUARANTEED INCOME PROGRAMS

Per the California Welfare and Institutions Code [\(WIC\) Section 18997](#) and All County Welfare Directors Letter [\(ACWDL\) dated July 21, 2023](#), payments received via the state funded GI Pilot Programs (funded pursuant to [WIC Section 18997](#)) are excluded from being counted as income or resources for CAPI eligibility or benefit amount purposes.

Other GI programs which are not state funded (pursuant to [WIC Section 18997](#)) must be evaluated to determine whether the receipt of that GI is considered countable unearned income or if an income exclusion applies, such as a determination that the payments are assistance based on need (ABON).

EVALUATING OTHER NON-STATE FUNDED GUARANTEED INCOME PROGRAMS

When counties evaluate other GI program payments not received via the state funded GI Pilot Program (authorized by [WIC Section 18997](#)), counties must evaluate the funding source(s) and eligibility requirement(s) of GI programs on a case-by-case basis to determine whether the receipt of the GI payment is countable income; or an applicable income exclusion listed per [MPP Section 49-035.53](#).

For example, to determine whether a GI payment should be excluded from countable income as ABON, counties must determine if it is entirely funded by the state or political subdivision *and* whether it uses income as an eligibility factor [Program Operations Manual System (POMS) [SI 00830.175](#); [MPP 49-035.53\(c\)](#)].

When counties determine that money received from a GI program is considered ABON it must be excluded from being counted as income. However, money provided to a CAPI applicant or recipient from a GI program that is partially funded by private or federal funds *or* does not use income as an eligibility factor, it must be counted as unearned income, unless another exclusion applies.

EXAMPLES OF HOW TO EVALUATE GUARANTEED INCOME PAYMENTS FOR POSSIBLE EXCLUSION

Example 1: Guaranteed Income, County Funded, Determined to be Assistance Based on Need, Excluded.

A county implemented a GI program that is entirely county funded and uses a person's income to determine eligibility. Accordingly, this GI income is considered ABON and *is excluded* from being counted as income when determining CAPI eligibility, as the GI program is entirely county funded and use income as an eligibility factor.

Example 2: Guaranteed Income, Privately Funded, Determined to be Unearned Income, Not Excluded.

A California city implemented a GI program that is both city and privately funded. Because the GI program is partly funded privately, assistance received from the program would *not be excluded* as ABON and must be counted as unearned income for CAPI eligibility (unless another exclusion is applicable).

Example 3: Guaranteed Income, County Funded, No Income Eligibility, Determined to be Unearned Income, Not Excluded.

A county implemented a GI program that is entirely county funded but does not use income to determine eligibility. Therefore, assistance received from this program would not qualify as ABON. Payments from this program would not be excluded and must be counted as unearned income for the purpose of CAPI eligibility (unless another exclusion is applicable). For example, if the applicant or recipient has no other unearned income, then \$20 of the GI payments could be excluded per the unearned income exclusion per [MPP Section 49-035.53\(m\)](#).

Questions regarding this letter can be sent to the Cash Assistance Program for Immigrants in-box at: CAPI@dss.ca.gov.

Sincerely,

Original Document Signed By

LEORA FILOSENA, P.M.P.
Deputy Director
Adult Programs Division