

January 7, 2025

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

EXECUTIVE SUMMARY

ALL COUNTY LETTER NO. 25-05

This policy letter provides answers to frequently asked questions regarding the California Work Opportunity and Responsibility to Kids Family Reunification policy outlined in All County Letter 23-94, as well as a revised Notice of Action message.



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

January 7, 2025

ALL COUNTY LETTER NO. 25-05

TO: ALL COUNTY WELFARE DIRECTORS
ALL COUNTY CALWORKS PROGRAM SPECIALISTS
ALL CALFRESH PROGRAM SPECIALISTS
ALL COUNTY REFUGEE COORDINATORS
ALL COUNTY CONSORTIA REPRESENTATIVES
ALL COUNTY CHILD WELFARE SERVICES DIRECTORS
ALL CHIEF PROBATION OFFICERS
ALL WELFARE-TO-WORK COORDINATORS
ALL COUNTY LINKAGES COORDINATORS
ALL COUNTY CHILD WELFARE SERVICES COORDINATORS
ALL FOSTER CARE MANAGERS
ALL COURT-APPOINTED SPECIAL ADVOCATE PROGRAMS

SUBJECT: CALIFORNIA WORK OPPORTUNITY AND RESPONSIBILITY TO
KIDS: FAMILY REUNIFICATION FREQUENTLY ASKED
QUESTIONS AND REVISED NOTICE OF ACTION MESSAGE

REFERENCE: [ASSEMBLY BILL \(AB\) 135 \(CHAPTER 85, STATUTES OF 2021\),](#)
[AB 236 \(CHAPTER 545, STATUTES OF 2017\), AB 429](#)
[\(CHAPTER 111, STATUTES OF 2001\); 7 CODE OF FEDERAL](#)
[REGULATIONS \(CFR\) SECTION 273.2\(i\)\(2\)\(i\)\(A\); WELFARE AND](#)
[INSTITUTIONS CODE \(WIC\) SECTION 361.5, WIC SECTION](#)
[10370, WIC SECTION 11203, WIC SECTION 11253.5\(6\), WIC](#)
[SECTION 11265.45\(d\), AND WIC SECTION 11450; ALL COUNTY](#)
[LETTER \(ACL\) 03-59, ACL 07-04, ACL 11-04, ACL 14-98, ACL 15-](#)
[22, ACL 17-87, ACL 21-101, ACL 23-94 AND ACL 24-48;](#)
[DEPARTMENT OF HEALTH CARE SERVICES ALL COUNTY](#)
[WELFARE DIRECTORS LETTER 20-10; MANUAL OF POLICIES](#)
[AND PROCEDURES \(MPP\) SECTION 42-721.48, 44-316.2, 82-](#)
[812.671 AND 82-820.23](#)

This All County Letter (ACL) provides answers to frequently asked questions submitted by county Health and Human Service Agencies (HHSAs) and county Child Welfare Services (CWS) agencies regarding the California Work Opportunity and Responsibility to Kids (CalWORKs) Family Reunification (FR) policy outlined in [All County Letter \(ACL\) 23-94](#). Additionally, this ACL revises a CalWORKs FR notice of action (NOA) message that was initially released in [ACL 24-48](#).

The Department of Health Care Services released [Medi-Cal Eligibility Division Information Letter \(MEDIL\) I 24-26](#) to address impacts to the Medi-Cal program for families recommended to receive CalWORKs FR cash aid and services. Additionally, CDSS will soon release a joint CalWORKs and CWS policy letter containing CWS implementation guidance for CalWORKs FR.

BACKGROUND

[ACL 23-94](#) provided implementation guidance regarding AB 135 (Chapter 85, Statutes of 2021), which authorized the provision of cash aid and child care services to families participating in CalWORKs FR as part of their CWS reunification plan for up to six months. AB 135 also increased the temporary absence period for CalWORKs FR from up to 180 calendar days to up to six full months, not inclusive of the initial temporary absence period.

The process for the provision of CalWORKs FR services only (no cash aid) was not impacted by AB 135 and remains unchanged; for guidance on CalWORKs FR services, please refer to [ACL No. 02-36](#) and ACINs No. [I-64-15](#) and [I-49-04](#).

CalWORKs Family Reunification Eligibility

Effective January 1, 2025, all participants who were members of the CalWORKs family when the CalWORKs-eligible children were removed from the home will be eligible for CalWORKs cash aid, child care, and reunification services for up to six full months when all the following conditions apply:

1. All CalWORKs-eligible children were removed from the home and temporarily placed in out-of-home care by the CWS agency. For the purposes of CalWORKs FR eligibility, “all CalWORKs-eligible children were removed from the home” includes families in which a parent is either receiving aid as a pregnant-person only (PPO) assistance unit or receiving aid as an existing CalWORKs FR family and a newborn is removed from the home.
2. The family was receiving CalWORKs cash aid when all CalWORKs-eligible children were removed from the home.
 - At least one parent or needy caretaker relative must have been aided at the time of the child(ren)’s removal to be eligible for CalWORKs FR cash aid, child care, and reunification services. There is an exception for AUs

that have a parent with a welfare-to-work (WTW) sanction (see third bullet below).

- Unaided parents/caretaker relatives, such as Supplemental Security Income (SSI) participants, ineligible noncitizens, non-needy caretaker relatives, or timed-out parents who do not qualify for a Time on Aid (TOA) exception or extender are not eligible to receive CalWORKs FR cash aid or services for themselves or their child(ren) because they are not eligible for cash aid unless the parent is a WTW sanctioned parent.
 - WTW-sanctioned parents may participate in CalWORKs FR services. Sanctioned parents are not eligible for cash aid under CalWORKs FR until the sanction has ended and the parent has been added back to the family. HHSAs and CWS agencies are encouraged to work together and use the CWS case plan to cure the sanction as described below. Children in an FR plan will remain eligible for cash aid even if the adults are in WTW sanction status.
3. The CWS agency or court has determined that the provision of CalWORKs FR cash aid, child care, and/or services is necessary for reunification and a CWS reunification plan is in effect or being developed ([MPP Section 82-812.671](#)).

As a reminder, while CalWORKs FR cash aid is limited to six full months, but the family may remain eligible for CalWORKs FR services as a zero-basic grant (ZBG) case if good cause is granted by the CWS agency. For information on ZBG cases and CalFresh impacts, see Question #27.

CLARIFICATION REGARDING FAMILY REUNIFICATION CASE PLAN AND WELFARE-TO-WORK PLANS

Counties serving families receiving CalWORKs FR cash aid are strongly encouraged to use the CWS FR case plan or the Linkages shared case plan and to include activities or services provided by CalWORKs within that plan, in place of the WTW 2 Plan Activity Assignment (WTW 2). Doing so will increase families' ability to successfully reunify by eliminating conflicting requirements that families must meet.

If additional activities or services not included in the CWS FR case plan are required, the HHSA should use the WTW 2 alongside the CWS FR case plan. For CalWORKs FR participants who have signed the WTW 2 but are not adhering to their WTW plan, potentially risking sanctions, the HHSA must evaluate all relevant factors before proceeding with the sanction process. This evaluation includes, but is not limited to, determining good cause, referring participants to Family Stabilization, and consulting with the CWS worker prior to sanctioning participants. The CWS case plan remains in effect until the family is no longer in the CalWORKs FR program.

FAMILY REUNIFICATION FORMS AND NOTICES OF ACTION

As a result of the policy clarification and revised guidance included in this ACL, the following forms have been impacted.

WTW Family Reunification Notice of Action Messages

The following notices are changed to align with policy guidance contained in this ACL which allows CalWORKs FR cash aid for families which include a parent with a WTW sanction.

The HHSA is required to review all documentation generated by CalSAWS and manually generate replacements when applicable.

NOA	Required Manual Revision
NA 816A (01/24)	Create a manual NOA using the language from NA 816A; Replace the "\$0" benefit amount with the manually calculated benefit amount for the child(ren) only; Add "See the next page for more information about how we figured how much your family will get if your family's cash aid is lowered."; Include a budget attachment with the NOA.
NA 817A (01/24)	Obsolete, replace with NA 817B (04/24).
NA 840B (04/24)	Create a manual NOA using the language from NA 840B; Replace the "\$0" benefit amount with the manually calculated benefit amount for the child(ren) only; Add "See the next page for more information about how we figured how much your family will get if your family's cash aid is lowered."; Include a budget attachment with the NOA.
NA 845A (03/24)	Create a manual NOA using the language from NA 845A; Add "See the next page for more information about how we figured how much your family will get if your family's cash aid is lowered."; Include a budget attachment with the NOA.

Revised Family Reunification Notice of Action Message

[M82-812C \(10/24\) – Family Reunification – End of Cash Aid](#)

This notice must be utilized to inform CalWORKs FR families that their cash aid is ending while in a family reunification plan. This NOA message was revised to remove reference to situations where the eligible adult has exhausted their 60 months CalWORKs aid while in CalWORKs FR. If there are no other eligible adults, the family must be discontinued from CalWORKs.

COPIES AND TRANSLATIONS

Forms referenced in this letter are available on the [CDSS Forms/Brochures webpage](#). When CDSS completes translations of a form, they are posted on the [Translated Forms and Publications webpage](#). When made available by CDSS, forms translated into an individual's preferred language must be provided to the

individual pursuant to [Manual of Policies and Procedures \(MPP\) Section 21-115.2](#). For questions on translated materials, please contact the Translation Services Section at Its@dss.ca.gov. If translations are not available, recipients who have elected to receive materials in languages other than English should be sent the English version of the form or notice along with the [GEN 1365-Notice of Language Services](#) and a local contact number. See [All County Letter \(ACL\) 22-56](#).

Per [MPP Section 21-115](#), the HHSAs must ensure effective bilingual services are provided. This requirement may be met through utilization of paid interpreters, qualified bilingual employees, and qualified employees of other agencies or community resources. These services must be provided, free of charge, to the applicant/recipient. If CDSS does not provide translations of a form, it is the county's responsibility to read and interpret the form if an applicant or recipient requests it. See [ACL 22-56](#).

Additionally, the HHSA must provide auxiliary aids and services to people with vision, hearing, or speech disabilities, where applicable. More information regarding provisions for services to applicants and recipients who have limited English proficiency or who have disabilities can be found in [MPP Section 21-115](#) and [ACL 19-45](#).

NEED FOR FURTHER CLARIFYING GUIDANCE

If you have any questions or need additional guidance regarding CalWORKs eligibility, contact the Early Engagement & Eligibility Bureau at CWEligibilityPolicy@dss.ca.gov. For questions regarding FR services, contact the CalWORKs Engagement Bureau at CWEngagementPolicy@dss.ca.gov.

For questions regarding CalFresh eligibility, contact the CalFresh Policy and Employment Bureau at CalFreshPolicy@dss.ca.gov. For questions regarding CWS Family Reunification, contact the Family Reunification and Pathways to Permanency Unit at Reunification-Permanency@dss.ca.gov.

Sincerely,

Original Document Signed By

ALEXIS FERNÁNDEZ GARCIA
Deputy Director
Family Engagement and Empowerment Division

Attachments

FREQUENTLY ASKED QUESTIONS

FAMILY REUNIFICATION PLAN

1. Does CalWORKs FR cash aid begin automatically for CalWORKs families when all CalWORKs-eligible children are removed from the home? Is a court order required?

No, CalWORKs FR cash aid does not begin automatically.

Upon notification from the CWS agency that all CalWORKs-eligible children have been removed from the home, the CalWORKs worker must not immediately discontinue the case, but instead consider the children to be temporarily absent for a period of up to a full calendar month, even though a CWS reunification plan has not yet been established.

For CalWORKs FR cash aid to take effect, there must be either: (1) a case plan in effect or under development by the CWS agency that *includes the provision of cash aid* or (2) a court order for a case plan that *includes the provision of cash aid*. Upon notification that the CWS agency or a court recommends CalWORKs FR, and the reunification plan includes a recommendation for the provision of cash aid as necessary to support reunification, the CalWORKs worker must start CalWORKs FR cash aid and continue aid for a maximum of six full months if the family is otherwise eligible.

A court-ordered reunification plan is not necessary for the family to be transitioned to a CalWORKs FR aid code and start receiving cash aid and/or services. Absent a court order, when all CalWORKs-eligible children are removed from the home, the HHSA should work closely with the CWS agency to ensure that the CWS agency makes a timely decision as to whether CalWORKs FR cash aid and services are appropriate for the family.

2. When this policy becomes effective on January 1, 2025, will all existing FR cases be granted CalWORKs FR cash aid for the remainder of their FR Plan?

Per ACL 23-94, existing FR plans that do not include a recommendation for the provision of cash aid must be amended prior to cash aid approval. HHSA and CWS agencies are encouraged to coordinate their review of existing FR plans to ensure that amendments to include the provision of cash aid are incorporated effective January 1, 2025, and ongoing.

A forthcoming ACL issued jointly with the Children and Family Services Division (CFSD), will require that the provision of cash aid be included in the CWS case plan when the CalWORKs family is recommended for CalWORKs FR. This letter is anticipated to be released in January 2025.

3. Can families receive CalWORKs FR cash aid multiple times or is it a once-in-a-lifetime policy?

Eligible families can receive up to six months of CalWORKs FR cash aid for every instance of child removal that results in a CWS reunification plan with a recommendation of cash aid. There is no lifetime limit.

FAMILY REUNIFICATION AND FOSTER CARE PLACEMENT

4. ACL 23-94, page 3 states “all CalWORKs-eligible children were removed from the home and temporarily placed in out of home care by the county child welfare services (CWS) agency...”. What is considered out of home care?

Out-of-home care is any placement of the child(ren) after removal and is designed to protect children who cannot safely remain in their home with their parent, legal guardian, or Indian custodian due to abuse or neglect. The CWS worker must consider non-custodial parents, relatives, and extended family members first for out-of-home placement. For more information on out-of-home care, please see <https://www.cdss.ca.gov/foster-care>.

5. Can children be placed with other family members and still be eligible for CalWORKs? If so, can the family the children are now placed with apply for CalWORKs?

No. When CalWORKs FR cash aid is approved, the needs of all CalWORKs eligible children removed from the home are included in the CalWORKs grant provided to the CalWORKs FR parent. The children's needs may not also be included as part of another aided CalWORKs family. However, a parent or needy caretaker relative of a child may be eligible for cash aid for themselves.

Relative caregivers of children who have been removed from their home and whose parent(s) are receiving CalWORKs FR can apply for [Aid to Families with Dependent Children-Foster Care \(AFDC-FC\)](#) or the [Approved Relative Caregiver Alternative \(ARC\) Program](#) to receive support for the children. The AFDC-FC program provides cash and Medi-Cal benefits for children placed into foster care. ARC provides payments to a relative caregiver when the relative caregiver or child has been denied federal foster care funding. The HHSA and CWS agencies are encouraged to inform families about the AFDC-FC and ARC programs when appropriate.

6. Will ARC/CalWORKs foster care (FC) benefits impact eligibility for CalWORKs FR?

No. AFDC-FC and/or ARC payments do not impact the CalWORKs FR cash aid benefits paid to the parent who is working to reunify with their children. In addition, the provision of CalWORKs FR cash aid is funded with state general funds and does not affect potential eligibility for foster care or other federally funded programs. CalWORKs

FR provides cash aid to parents who were part of the family at the time of their child(ren)'s removal. The CalWORKs grant amount while in FR includes the needs of all CalWORKs-eligible children removed by the CWS agency for up to six full months while the child is not in the home that is receiving the CalWORKs FR cash aid. If an out-of-home caregiver applies and is approved for ARC or any other FC program for the child that was removed, the child's cash benefit from those programs is not considered available income to the CalWORKs FR family and the CalWORKs FR cash aid amount will not be impacted.

7. What happens to the CalWORKs grant if the child(ren) is placed into long-term foster care or otherwise no longer part of a CWS FR plan?

When the CWS agency notifies the HHSA that reunification is no longer possible for any of the children who were removed, the CWS FR plan will be terminated, and the HHSA must evaluate the case to determine if the family remains eligible for CalWORKs. If there are no other eligible children in the home, the family must be discontinued from CalWORKs with timely and adequate notice. If the HHSA does not have ten days to discontinue, the family will be discontinued at the end of the following month, and an overpayment will not be established. If reunification continues to exist for at least one child, the family will need to be re-evaluated for CalWORKs FR based on the revised AU size.

FAMILY REUNIFICATION AND CALWORKS ASSISTANCE UNIT

8. Are Non-Needy and/or Needy Caretaker Relatives eligible for CalWORKs FR cash aid and services?

No, **non-needy** caretaker relatives are not eligible for CalWORKs FR.

A **needy** caretaker relative is only eligible for CalWORKs FR if they were a member of the same family as the parent(s) and child(ren) when the child(ren) were removed from the home. Additionally, the CWS agency must determine that providing FR cash aid and services to the needy caretaker relative is necessary for reunifying the parent(s) and child(ren) and would need to be specified in the reunification plan.

CalWORKs FR services are defined in ACL 23-94 and [WIC section 11203](#) as "those CalWORKs services that CWS determines to be necessary for a reunification parent(s) to reunite with their child(ren) and are specified in the reunification plan." This can include any supportive service necessary to participate in the reunification activities. For example, if the reunification plan requires attendance at a parenting class, appropriate supportive services would include transportation assistance and payment of the course fee, if one is required. The regular CalWORKs requirements for providing notice of any full or partial denial of supportive services, or reduction or termination of services apply.

9. If a child is placed with a needy relative caregiver, can the needy relative caregiver be eligible for CalWORKs aid, if not already receiving CalWORKs aid?

Yes. In accordance with [MPP Section 82-820.23](#), a needy caretaker relative of a child receiving federal, state or local foster care maintenance payments is eligible for CalWORKs for themselves as an assistance unit of one. The needy caretaker would be eligible to cash aid and services and would not be considered a CalWORKs FR recipient.

A child who is part of a CalWORKs FR family is ineligible for CalWORKs cash aid in the needy relative caregiver's CalWORKs case because their needs are already being considered in the CalWORKs FR grant; however, the child may be eligible for foster care payments as described in Question 4.

10. A CalWORKs parent with an active FR plan has their newborn removed from them upon birth. Is the newborn added to the FR plan and the CalWORKs grant?

If the CWS agency or court adds the newborn to the existing reunification plan, then the newborn's needs must be added to the family after all verifications have been provided to the HHSA under existing CalWORKs rules. As a reminder, the CW 8A must be completed to add the newborn to the existing case and existing processes to add a child to the family unit mid-period remain applicable. Upon removal, the HHSA and CWS agency should immediately review whether CalWORKs FR cash aid, child care, homeless assistance and/or CalWORKs FR services are appropriate, and document the reunification goal in the CWS case plan.

11. Are PPO families eligible for CalWORKs FR when a newborn has been removed by the CWS agency at birth and there are no other CalWORKs-eligible children in the home?

A PPO case with no other CalWORKs-eligible children will be eligible for CalWORKs if a newborn child is removed from the home by the CWS agency. The initial temporary absence period will begin the date the newborn is removed. If the CWS agency recommends CalWORKs FR cash aid and services as part of their FR plan, the family meets the criteria outlined in ACL 23-94, and the family will transition to a CalWORKs FR aid code and begin receiving services and cash aid while working on their FR plan. As a reminder, the CW 8A must be completed to add the newborn to the existing case and existing processes to add a child to the family unit mid-period remain applicable. Please see Attachment A for a visual flow of this process.

12. What would be the impact on an existing CalWORKs FR case when the parent gives birth and that baby is not removed from the home, meaning the family no longer meets the CalWORKs FR eligibility criteria that "[a]ll CalWORKs-eligible children were removed from the home." Would the family still be eligible for CalWORKs FR? Would they be required to switch

to a WTW plan even though they are still involved with the CWS agency for the other children removed from the home?

To be eligible for CalWORKs FR cash aid and services, all CalWORKs-eligible children must be removed from the home and placed in out-of-home care. There cannot be additional CalWORKs-eligible children in the home, whether at the time of establishing CalWORKs FR eligibility or subsequently. In this case, the family would no longer be eligible for CalWORKs FR. The newborn would be added to the family, as well as any other members who are subject to mandatory inclusion rules. For example, the newborn's other parent. The family will transition from a 4P/4R aid code to the appropriate CalWORKs aid code. The children who have been removed from the home will not be included in the family's grant calculation. The former CalWORKs FR cash aided family may continue to use the CWS FR case plan in lieu of other WTW plans until the removed children are reunited with the family or the CWS agency determines that reunification will not occur. However, the family will be subject to the WTW noncompliance process described in MPP Section 42-721.

13. If a CalWORKs family includes a child receiving Supplemental Security Income (SSI)/State Supplemental Payment (SSP) that was not removed from the home, would the family be eligible for CalWORKs FR?

Yes, the family would be eligible for CalWORKs FR if the CWS agency recommends CalWORKs FR services and cash aid in the FR plan because all the CalWORKs-eligible children were removed from the home. In accordance with MPP 82-832.1, a child receiving SSI/SSP is excluded from the grant calculation.

DOCUMENTATION OF CASH AID IN FAMILY REUNIFICATION PLAN

14. Existing reunification plans that do not already include a recommendation for the provision of cash aid must be amended prior to cash aid approval.

- a) **Will CWS workers be reviewing their existing FR families to determine eligibility for cash aid?**
 - b) **Wouldn't all FR families benefit from continuing to receive cash aid, and, if so, can this be a default process?**
-
- a) Counties are strongly encouraged to use a shared case plan as recommended by the [Linkages](#) practice because of the collaboration it fosters between programs and the increased ease of understanding for families which supports their reunification efforts. Further instruction about the requirement for CalWORKs FR cash aid in the CWS case plan will be addressed in the forthcoming joint program ACL.
 - b) Each CalWORKs family, where the CalWORKs-eligible children have been removed and placed into out-of-home care, must be evaluated by the CWS agency to determine if CalWORKs FR services are needed. Additionally, the provision of cash aid must be included in the CWS FR plan for the family to receive CalWORKs FR cash aid. For existing CWS FR plans that are modified on or after January 1,

2025, the six months of CalWORKs FR cash aid will begin the date the plan is amended. CalWORKs FR cash aid will be prorated in the event the grant is approved after the first of the month. The prorated month will not count towards the six full months of CalWORKs FR cash aid. CalWORKs FR cash aid cannot be issued prior to January 1, 2025.

15. Can counties establish overpayments for families receiving CalWORKs FR cash aid and services should they miss a mandatory report and receive assistance they may not have been eligible for? Would they be eligible for underpayments/supplemental payments?

Since CalWORKs FR families are receiving cash aid, they remain subject to all the cash aid rules including overpayments. Therefore, if a CalWORKs FR family receives a month of cash aid that they were not eligible for, the HHSA will establish an overpayment and pursue collection, as applicable.

A CalWORKs FR family is also eligible for an underpayment and supplemental payment if they did not receive aid that they were eligible for. For instance, the CalWORKs FR family did not receive a full grant because of a sanction that was later determined to be incorrect. In this situation, the CalWORKs FR family would be eligible for an underpayment per MPP 44-351. If the CalWORKs FR family is still receiving a cash grant while in CalWORKs FR, they would receive a supplemental payment in addition to an increase in their grant.

16. Do counties have to issue retroactive payments if the family is restored to CalWORKs FR by a court after being discontinued? Usually, courts implement an FR plan and make it effective the day the children were removed.

No. If a court implements a CWS FR plan after the family has been discontinued from CalWORKs, the family's CalWORKs must be restored, but a retroactive payment will not be issued if the CalWORKs FR cash aid and services are implemented retroactively by the court. In these situations, the six months of CalWORKs FR cash aid must begin upon the date the family's CalWORKs benefits are restored. As a reminder, if the family's benefits are restored mid-month, they will receive a pro-rated month of CalWORKs FR cash aid, and that month would not count towards the six-month CalWORKs FR cash aid limit since it was not a full month of aid.

FAMILY REUNIFICATION & PENALTIES/SANCTIONS

17. Are parents with penalties and sanctions eligible for CalWORKs FR services and cash aid?

Yes, families with existing immunization, school attendance, and child support penalties are eligible for CalWORKs FR cash aid and services if they meet the criteria outlined in ACL 23-94.

However, the immunization penalty will remain on the CalWORKs grant until the family completes the action necessary to remove those penalties. HHSA's are strongly encouraged to provide families in FR with the CW 2209 and evaluate for good cause since parents in FR do not have custody of the children. If good cause is granted, the penalty will be removed from the CalWORKs grant while the family is in FR. CalWORKs FR families are exempt from school attendance penalties when a member of the family is cooperating with a plan developed by a CWS agency per [WIC 11253.5\(6\)](#) and [ACL 15-22](#). The HHSA is also encouraged to evaluate if the family in CalWORKs FR is eligible for a good cause exemption for not cooperating with the local child support agency and complete the CW 51 for the family, if applicable.

As outlined in ACL 23-94 and consistent with existing WTW sanction policies, individuals in a CalWORKs FR family who have a WTW sanction are only eligible for services and not cash aid (although the children in their FR plan are eligible for cash aid). Prior to imposing financial sanctions, HHSA's should determine if there is good cause for the participant(s) not complying with their WTW plan. HHSA's are encouraged to determine that good cause exists or use the CWS FR case plan as part of the WTW compliance plan to restore program compliance. For example, under the existing regulations for WTW non-compliance, Good Cause, and WTW sanctions, the HHSA may streamline these processes by determining that good cause exists for any CalWORKs FR participant who is using their CWS FR case plan in lieu of the WTW compliance or curing plan.

FAMILY REUNIFICATION CASH AID AND TIME ON AID

18. What happens if a parent reaches their 60-month time limit while in FR?

Parents participating in CalWORKs FR who receive a cash grant are subject to current CalWORKs regulations and processes, including time-on-aid (TOA). In two parent households, when one parent reaches their 60-month CalWORKs TOA limit, they must be removed from the grant calculation.

In one parent households where the adult reaches their 60-month TOA limit, the HHSA must evaluate if the parent is eligible for a TOA exception or extender prior to discontinuance. The CalWORKs FR cash aid must be discontinued, and the case closed if the parent is not eligible for a TOA extender or exception.

19. Does the CalWORKs and TANF TOA clock tick for CalWORKs FR families receiving a CalWORKs grant?

Families receiving CalWORKs FR cash aid and services are funded with state non-Maintenance of Effort (MOE) funds. Therefore, the TANF TOA clock will not tick during the months that a family receives CalWORKs FR cash aid. However, CalWORKs rules and processes pertaining to TOA remain unchanged. The CalWORKs 60-month TOA clock will continue to tick while a family is receiving cash aid under CalWORKs FR unless they meet the requirements for a CalWORKs TOA exception or extender.

20. Does the CalWORKs TOA tick if the family transitions to a zero-basic grant (ZBG) and continues to receive CalWORKs FR services??

If the CalWORKs FR family transitions to a ZBG case, their CalWORKs TOA clock will not tick while receiving CalWORKs FR services only because the family would be eligible for a grant under \$10 TOA exemption.

FAMILY REUNIFICATION AND POLICY TIMEFRAMES

21. As it relates to the temporary absence period of *up to 180 calendar days to up to a full six months*, could CalWORKs please provide an example of this temporary absence period? It is not clear how this period is increasing, as 180 calendar days and six full months are the same. Please clarify when the six-month period would start and whether partial months will be considered.?

AB 135 increased the allowable temporary absence period from “up to 180 days” to “six full months.” This change accounts for some months having more or less than 30 days and aligns with the generally applicable timeframes in CalWORKs, including issuing cash aid based on calendar months. For example, if a CalWORKs FR cash aid and services is placed into effect March 1, 2024, and set to end August 31, 2024, that totals 182 calendar days, exceeding the 180-calendar-day limit but totaling a full six-month period. Please see Attachment B for a flow of the temporary absence policy.

22. Can the cash grant for CalWORKs FR be extended beyond six months?

No. State funding for CalWORKs FR cash aid can only be provided to families in a CWS FR plan for a maximum of six full months. If a family receives a good cause extension for CalWORKs FR services but has not exhausted their six months of CalWORKs FR cash aid, then they will remain eligible for cash aid until they exhaust their six full months.

23. Are good cause extensions permitted for CalWORKs FR services?

Yes, good cause extensions are permitted for CalWORKs FR services. Per [MPP 82-812.679](#), a good cause extension can be granted when the CalWORKs worker assesses that more time is needed to fulfill the reunification plan, provided that the family remains eligible for CalWORKs following the six-month good cause redetermination. If the family has been receiving CalWORKs FR cash aid, the CalWORKs worker should evaluate whether eligibility for the provision or continuation of both CalWORKs FR cash aid and services still exists based on the number of months CalWORKs FR cash aid has been issued, net non-exempt income and other information already known by the HHSA

24. Is it expected that CWS would notify the HHSA that a good cause extension has been granted?

Effective collaboration between the HHSA and the CWS agency is vital for successfully reuniting CalWORKs families. Counties are urged to implement a collaborative case management process such as the Linkages practice that involves CalWORKs, WTW, CWS and eligibility staff. This approach will streamline the evaluation of whether CalWORKs FR cash aid and services are needed for family reunification and will enhance the coordination of these services with other vital supports needed for successful reunification.

FAMILY REUNIFICATION AND OTHER PROGRAMS

Refugee Cash Assistance (RCA)

25. Are participants of RCA eligible for CalWORKs FR?

No. Individuals participating in the RCA program are not eligible for CalWORKs FR.

CalFresh

26. Since the children of CalWORKs FR families are not in the home and this is “information known to the county,” will the children be removed from the CalFresh household mid-period or at the next SAR 7/recertification?

Per [ACL 21-101](#), information regarding the removal of a child from a CalFresh household obtained from the CWS agency and/or the county Foster Care system is Verified Upon Receipt (VUR) and would trigger mid-period action. This means the HHSA must act to remove the child(ren) from the CalFresh household mid-period, and not wait for the next SAR 7 or recertification. Additionally, the CalFresh allotment will be recalculated. Therefore, the household will remain eligible for CalFresh and not Transitional CalFresh (TCF).

As a reminder, if CalWORKs FR is not recommended in the families FR plan, the family would be discontinued from CalWORKs and may be eligible for TCF.

27. Are CalFresh households eligible for TCF while receiving CalWORKs FR cash aid and services?

No. CalFresh households are not eligible for TCF while they have an active CalWORKs case open and receive a CalWORKs grant. If a CalWORKs FR family has exhausted their six months of cash aid and they receive a good cause exemption, they will be transitioned to a zero-basic grant (ZBG) case and remain eligible for CalWORKs FR services only. Since the family remains eligible for CalWORKs as a ZBG case, they will remain eligible for CalFresh and will not be eligible for TCF per [All County Information Notice \(ACIN\) I-53-20](#).

28. If the children need to be removed from the CalFresh Household at SAR 7/RE or when applying for CalFresh on another case, what would the noticing be for these children?

The CalFresh noticing requirements remain unchanged. If the children are removed from the CalFresh household due to a household composition change, a notice of adverse action must be issued within 10 days of the date the change was reported, in accordance with [7 CFR 273.12\(c\)\(2\)\(i\)](#).

29. For the CalFresh Household, does the CalWORKs Income Reporting Threshold (IRT) still apply? For example, a family of 3 for CalWORKs where one child has been removed from the home, but CalWORKs FR cash aid and services were approved.

No, the CalWORKs IRT does not apply. The household is a Non-Assistance CalFresh (NACF) household and not Categorically Eligible (CE), and the household is subject to the CalFresh IRT. CalWORKs FR cash aid is state funded and does not include MOE funds. Per [7 CFR 273.2\(i\)\(2\)\(i\)\(A\)](#), only households where all members are receiving cash through a public assistance program funded in full or in part with federal money under Title IV-A or with State money counted for MOE purposes under Title IV-A can be considered CE.

30. What aid code will be used for CalFresh?

The CalFresh aid code will be 09 for families receiving CalWORKs FR cash aid and services.

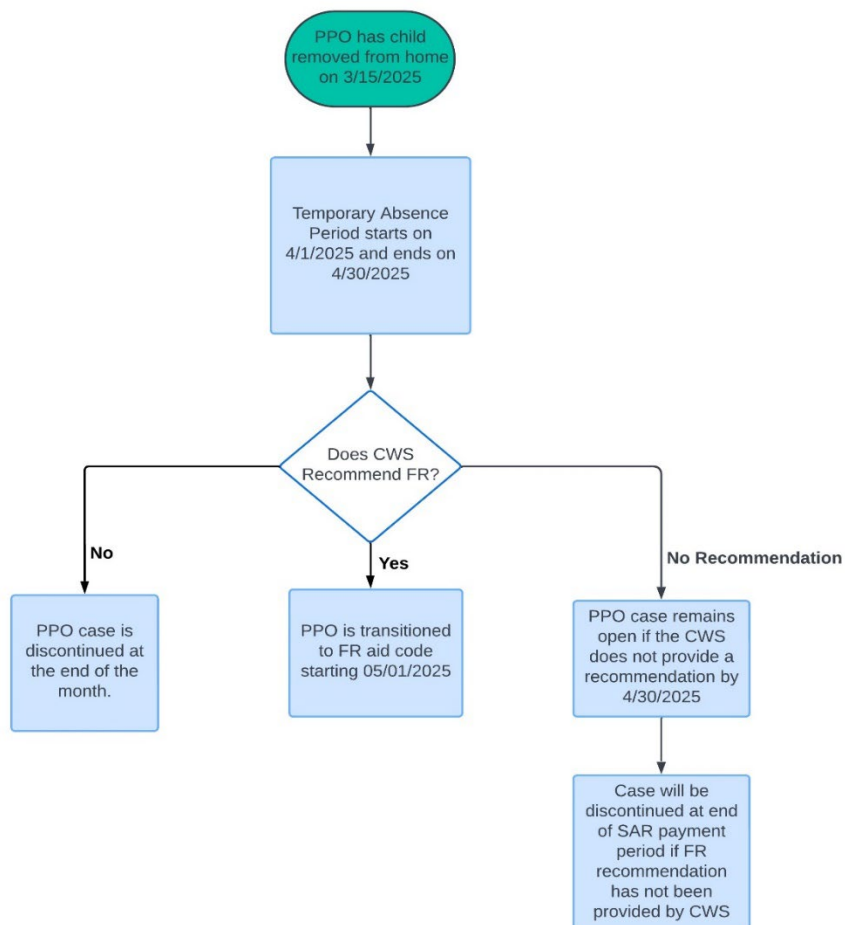
ATTACHMENT A

PREGNANT PEOPLE ONLY (PPO) AND FAMILY REUNIFICATION (FR)

For PPO cases, when the newborn is removed at birth by the CWS agency, the case will remain open during the initial temporary absence period. If the CWS agency does not provide a recommendation for CalWORKs FR by the end of the temporary absence period, the PPO case will remain open until the end of the SAR payment period in accordance with ACL 12-25. At this point, if CWS does not recommend CalWORKs FR services and cash aid, the case will be discontinued if there are no other eligible children in the home.

Below is an example of the flow when a newborn is removed by the CWS agency in a PPO case:

1. PPO has child removed from home on 3/15/2025.
2. Temporary Absence Period starts on 4/1/2025 and ends on 4/30/2025.
3. Does CWS Recommend FR?
 - a. No: PPO case is discontinued at the end of the month.
 - b. Yes: PPO is transitioned to FR aid code starting 05/01/2025.
 - c. No Recommendation: PPO case remains open if the CWS does not provide a recommendation by 4/30/2025.
 - I. Case will be discontinued at end of SAR payment period if FR recommendation has not been provided by CWS.



ATTACHMENT B

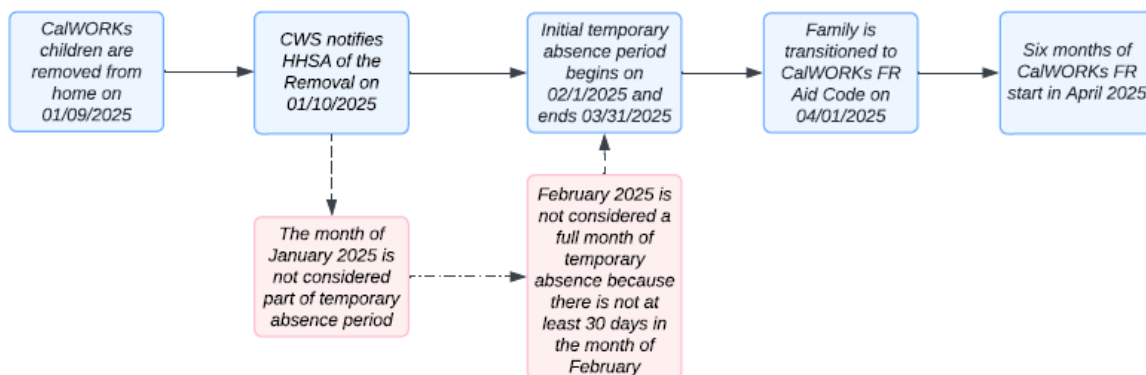
INITIAL TEMPORARY ABSENCE PERIOD FLOW

In accordance with MPP Section 82-812.5, a member of a CalWORKs family is considered temporarily absent if they will be absent from the home for one full calendar month or less. One full calendar month is defined as the first of the month through the last day of the month; however, if a family member has been absent for the entire month of February, the calendar month will not be deemed complete until the individual has been absent for 30 days.

Below are two flows that depict the initial temporary absence flow. In both scenarios, CalWORKs FR cash aid and services were recommended by CWS agency within the temporary absence period.

Flow #1: Child(ren) removed in January

1. CalWORKs children are removed from the home on 01/09/2025.
2. CWS notifies the HHSA of the removal on 01/10/2025.
 - a. The month of January 2025 is not considered part of the temporary absence period.
3. Initial temporary absence period begins on 02/01/2025 and ends on 3/31/2025.
 - a. February is not considered a full month of temporary absence because there is not at least 30 days in the month.
4. Family is transitioned to CalWORKs FR aid code on 04/01/2025.
5. Six months CalWORKs FR starts in April 2025.



Flow #2: Child(ren) removed in any other month

1. CalWORKs children are removed from the home on 03/09/2025.
2. CWS notifies HHSA of the removal on 03/10/2025.
3. Initial temporary absence period begins on 04/01/2025 and ends on 04/30/2025.
4. Family is transitioned to CalWORKs FR aid code on 5/01/2025.
5. Six months of CalWORKs FR start in May 2025.

