

April 1, 2025

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

**EXECUTIVE SUMMARY**

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

The purpose of this All County Letter is to provide guidance regarding scheduled annual redeterminations when a Cash Assistance Program for Immigrants recipient's benefit is in suspended status and provide examples for clarification.



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DIRECTOR

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GAVIN NEWSOM  
GOVERNOR

April 1, 2025

ALL COUNTY LETTER NO. 25-21

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

SUBJECT: **GUIDANCE REGARDING CASH ASSISTANCE PROGRAM FOR  
IMMIGRANTS ANNUAL REDETERMINATIONS**

REFERENCES: MANUAL OF POLICIES AND PROCEDURES (MPP) SECTIONS  
[22-001\(t\)\(1\)](#), [22-072.4](#), [30-009.234](#), [49-030.1.11](#), [49-060 et seq.](#),  
and [49-070.1](#); PROGRAM OPERATIONS MANUAL SYSTEM  
(POMS) SECTIONS [SI 02305.010](#), [SI 02305.022 \(A\)\(5\)](#);  
[ALL COUNTY LETTER NO. 18-07](#)

The purpose of this All County Letter (ACL) is to provide guidance regarding scheduled annual redeterminations when a Cash Assistance Program for Immigrants (CAPI) recipient's benefit is in suspended status and to provide examples for clarification.

## **BACKGROUND**

Pursuant to the [Manual of Policies and Procedures \(MPP\) Section 49-070.1](#), a CAPI recipient's eligibility must be redetermined within 12 months of the recipient's initial benefit payment date and within each succeeding 12-month period. Additionally, per [MPP Section 49-060.2](#), if an individual's CAPI benefit is suspended, the individual has up to 12 months after the date of suspension to regain eligibility and have benefits reinstated. The intent of this ACL is to clarify and promote uniform administration of redetermination of a recipient's eligibility if scheduled to occur during an active suspension period. This letter also provides examples to illustrate CAPI policy.

## ANNUAL REDETERMINATION GUIDANCE

If an annual redetermination is scheduled to occur *while* a CAPI recipient's benefit is suspended, the redetermination only occurs *after* the cause of the suspension is resolved and the CAPI recipient's benefit is reinstated to active pay status. This guidance aligns with federal policy on completing pending redeterminations upon a recipient's reinstatement ([POMS Section SI 02305.022](#)). Once the suspension is resolved, the annual redetermination must be initiated immediately for the recipient to be determined eligible for continued benefits. The first day of the month in which the redetermination is *initiated* becomes the new scheduled annual redetermination date and is the start date of the new annual redetermination period ([see Example 1](#)).

If an annual redetermination is scheduled to occur on the *same date* the cause of suspension is resolved (and thus client is reinstated), the annual redetermination is initiated *that day* ([see Example 2](#)).

If the scheduled annual redetermination date falls *after* the date the recipient resolves the cause for suspension, the annual redetermination should be completed as originally scheduled and a redetermination should not be completed upon reinstatement ([see Example 3](#)). The only exception is when the information provided to the county for reinstatement clearly demonstrates a change in circumstances that is likely to alter the recipient's eligibility or monthly benefit amount. If this occurs, a redetermination of benefits must be completed within 30 days of the information becoming known to the county. ([MPP Section 30-009.234](#)).

If the recipient does not resolve the cause that led to suspension of benefits and is thus terminated from CAPI after 12 months of suspension, the annual redetermination is not completed, and the applicant must re-apply for CAPI ([MPP Section 49-060.31](#)). Counties are reminded to mail all Notices Of Action (NOAs) to recipients at least 10 days before the effective date of the action ([MPP Section 22-001\(t\)\(1\)](#)). The 10-day period shall NOT include the date of mailing or the date the action is to take effect ([MPP Section 22-072.4](#)).

As a reminder, eligibility workers should continue to follow guidance regarding suspensions, reinstatement, retroactive payments and terminations found in [ACL No. 18-07](#).

## EXAMPLES OF ANNUAL REDETERMINATION DATES AND NOTICE PROCEDURE

### Example 1: Redetermination Date Falls During Suspension Period

A recipient's initial benefit start date was 02/01/2023. Therefore, the annual redetermination is scheduled for 02/01/2024. The recipient's benefit is suspended on 10/01/2023 and is reinstated to CAPI active pay status on 04/10/2024, as this is the first date they meet all eligibility requirements ([MPP Section 49-060.2](#)). Since the recipient was not in "active pay status" by virtue of having benefits suspended at the time the

redetermination was due, the annual redetermination remained “pending” until reinstatement ([POMS SI Section 02305.010 \(a\)\(1\)](#)).

In this example, the county would notify the recipient immediately (on 04/10/2024) regarding reinstatement, and send the redetermination packet, providing the individual 30 days to return the appropriate forms. In this example, the due date for returning the redetermination packet would be 05/10/2024. The county receives and date stamps the completed packet on 04/30/2024, therefore 4/01/2025 becomes the new scheduled annual redetermination date in the system.

Procedurally, the county must send a notice of change form ([NA 692](#)), to the individual marking the “change in benefits” section and select “other”. They should then input “see comment” and note in the comments section that “benefits have been *temporarily* reinstated to the “previous monthly benefit amount” (assuming no changes in circumstance) “while the annual redetermination of benefits is pending completion” ([POMS Section SI 02305.022 \(A\)\(5\)](#)).

The Redetermination Coversheet [SOC Form 111](#) will clearly state the due date for the recipient to return the forms. The mailing of the NOA regarding temporary reinstatement should coincide with the mailing of the renewal packet to the recipient and will start the redetermination period. The county has 30 days from receipt of the returned forms (if returned on or before the due date on SOC Form 111) to complete the eligibility determination as per normal procedures ([MPP Section 30-009.234](#)). Once the due date on the SOC Form 111 has passed, or the county has received a completed redetermination packet and made an eligibility determination, the county must provide notice to the recipient of the determination, whether the monthly benefit amount remains the same ([NA 693](#)), or will change ([NA 692](#)) ([MPP Section 30-009.22](#)). If the individual does not return the redetermination packet by the due date specified on the SOC 111, a *secondary/new* notice of suspension should be sent for failure to cooperate with the county’s written request for information or documentation ([MPP Section 49-060.1\(d\)](#)), unless a reasonable accommodation has been documented in the file.

Please note: In this example, if the recipient does not resolve the initial reason for benefit suspension by 10/01/2024, the recipient’s benefit will be terminated thereafter because eligibility is terminated for a recipient after 12 consecutive months of benefit suspension ([MPP Section 49-060.3](#)). Because the recipient’s benefit is terminated, the pending redetermination will not occur.

#### Example 2: Redetermination Date is the Same as Reinstatement from Suspension

A recipient’s annual redetermination is scheduled for 08/01/2024 and their benefit is suspended effective 06/01/2024. The suspension is resolved, and benefits are reinstated on 08/31/2024, which is the last day of the redetermination due month. The redetermination process is *started* on that day. The county would either mail the redetermination packet that day, or, if the client is in the office, provide the packet to the client. Since the redetermination was *initiated* on 08/31/2024, 8/31/2025 becomes the new annual redetermination date in the system.

### Example 3: Redetermination Date Falls After Suspension Ends

A recipient has an annual redetermination scheduled for 02/01/2024. Their benefits are suspended on 09/01/2023. The recipient has 12 months to resolve the reason for suspension prior to their benefits being terminated. On 11/01/2023, the recipient resolves the reason for suspension, and benefits are reinstated as of 11/01/2023. Because reinstatement is *prior* to the scheduled annual redetermination date of 02/01/2024, *and* the county determines there is no change to the recipient's circumstances, the reinstatement would *not* trigger an immediate redetermination. The county would send a notice regarding the restored benefits. The scheduled annual redetermination date will continue to be 02/01/2024.

### **COUNTY REDETERMINATION REMINDERS**

Verifications of SSI/SSP ineligibility due to immigration status from Social Security Administration (SSA) are acceptable within six months of issue. Therefore, if a redetermination is completed *less than* six months after the previous redetermination, counties should not refer CAPI recipients to SSA for a new SSI/SSP application; as the SSI/SSP referral should occur on the next redetermination date ([MPP Section 49-030.111](#)).

Additionally, it may be possible for a redetermination period to extend past 30 days when a redetermination packet is mailed and not provided to a recipient in person. When counties mail the packet, recipients must complete and return the enclosed documents by the written due date on the SOC Form 111. Once received, the county has 30 days from the date reflected on the SOC Form 111 to make a determination, including providing timely written notice of the determination.

Furthermore, in accordance with [MPP Section 30-009.2342](#), a recipient found to be ineligible upon redetermination *may* continue to receive benefits for up to 30 days.

When automation for CAPI suspension and redetermination is updated in CalSAWS, counties will receive further instructions regarding timelines programmed into the system for packet generation, mailing, and noticing.

### **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 [MPP Section 21-115.2](#). For questions on translated materials, please contact the Translation Services Section at [its@dss.ca.gov](mailto: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 [ACL 22-56](#).

Per [MPP Section 21-115](#), the County Welfare Departments (CWDs) 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 CWDs must provide auxiliary aids and services to persons 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](#).

If you have any questions or need additional guidance regarding the information in this letter, please contact the Benefit Programs Unit at the California Department of Social Services at [CAPI@dss.ca.gov](mailto:CAPI@dss.ca.gov).

Sincerely,

***Original Document Signed By***

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