

May 15, 2025

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

EXECUTIVE SUMMARY

ALL COUNTY LETTER NO. 25-32

The purpose of this All County Letter is to notify County Welfare Departments (CWDs) of a change to the CalFresh comparable disqualification policy and remind CWDs of the current policy regarding CalFresh disqualifications imposed for general work registration noncompliance. This letter also transmits the revised CalFresh Notice of Disqualification that is used to notify households of noncompliance with the general CalFresh work registration requirements.



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DIRECTOR

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DEPARTMENT OF SOCIAL SERVICES
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GAVIN NEWSOM
GOVERNOR

May 15, 2025

ALL COUNTY LETTER NO. 25-32

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

SUBJECT: CHANGE TO CALFRESH COMPARABLE DISQUALIFICATION
POLICY AND REVISED CALFRESH NOTICE OF
DISQUALIFICATION

REFERENCE: [MANUAL OF POLICY AND PROCEDURES \(MPP\) SECTION 63-407.54](#); [MPP SECTION 63-407](#); [MPP SECTION 63-407.21](#); [MPP SECTION 63-407.51](#); [MPP SECTION 63-407.52](#); [MPP SECTION 63-503.44](#); [MPP SECTION 63-407.6](#); [MPP SECTION 63-407.1](#); [MPP SECTION 63-300.5\(g\)\(3\)\(C\)](#); [MPP 63-403.2](#); [TITLE 7 CODE OF FEDERAL REGULATIONS \(CFR\) 273.1\(b\)\(7\)\(viii\)](#); [7 CFR 273.7](#); [7 CFR 273.7\(a\)](#), [7 CFR 273.7\(j\)](#); [7 CFR 273.2\(f\)\(6\)](#); [7 CFR 273.11\(i\)](#); [7 CFR 273.11\(k\)](#); [7 CFR 273.2\(i\)\(2\)\(vii\)](#); [ALL COUNTY LETTER \(ACL\) NO. 14-56](#); [ACL NO. 23-30](#)

The purpose of this All County Letter (ACL) is to notify County Welfare Departments (CWDs) of a change to the CalFresh comparable disqualification policy and to remind CWDs of the current policy regarding CalFresh disqualifications imposed for general work registration noncompliance. This letter also transmits the revised CalFresh Notice of Disqualification that is used to notify households of noncompliance with the general CalFresh work registration requirements.

BACKGROUND

Per [Title 7 Code of Federal Regulations \(CFR\) 273.1\(b\)\(7\)\(viii\)](#) and [7 CFR 273.11\(k\)](#), comparable disqualifications may be imposed at the State agency's option. Previously, per [Manual of Policies and Procedures \(MPP\) 63-407.54](#), California imposed a

comparable CalFresh disqualification when an individual was disqualified for failing to comply with the work requirements of the California Work Opportunity and Responsibility to Kids (CalWORKs) Welfare-to-Work (WTW) program, unemployment compensation, and substitute programs such as General Assistance and Refugee Resettlement programs.

POLICY CHANGE: COMPARABLE DISQUALIFICATION POLICY DISCONTINUED

The United States Department of Agriculture, Food and Nutrition Service has approved California's request to discontinue the option of imposing a comparable CalFresh disqualification when an individual is disqualified for failing to comply with the work requirements of the CalWORKs WTW program, unemployment compensation, and substitute programs.

Effective upon the release of this letter, California will no longer impose comparable disqualifications, as described at [7 CFR 273.11\(k\)](#). In accordance with state regulations at [MPP 63-403.2](#), the California Food Assistance Program (CFAP) follows CalFresh rules and regulations unless otherwise specified. Therefore, the policy changes outlined in this letter apply to CFAP.

However, the CWD must continue to ensure that CalFresh recipients who do not comply with the work requirements of the CalWORKs WTW program, unemployment compensation, or substitute programs are registered for work unless exempt from CalFresh work registration.

The CWD must screen the noncompliant individual for a CalFresh work registration exemption at the time noncompliance is reported. If the individual is not eligible for a CalFresh work registration exemption, the CWD must register the individual for work.

When an individual fails to comply with the work requirements of the CalWORKs WTW program, unemployment compensation, or substitute programs, they remain eligible for CalFresh, but per [7 CFR 273.11\(j\)](#), the household's monthly CalFresh allotment must not increase as a result of receiving a decreased CalWORKs grant. An increase is allowed only if the individual becomes ineligible for the CalWORKs WTW program during the disqualification period for some other reason or the household's CalWORKs case is closed. This policy change supersedes [MPP Section 63-407.54](#) and is effective upon the release of this letter.

If a noncompliant individual also does not meet the general CalFresh work requirement, the household's monthly CalFresh allotment must be recalculated based on the remaining eligible individuals in the household.

Upon release of this letter, individuals who are currently disqualified from CalFresh due to noncompliance with the work requirements of the CalWORKs WTW program may participate in CalFresh prior to the completion of their current disqualification period.

Households of one must reapply by submitting a new application. Individuals who are considered members of an existing CalFresh household are not required to submit a new application and may request to be added to the existing household. The request may be made by the disqualified individual, existing household members, or the household's Authorized Representative at periodic report, recertification, or voluntarily during the certification period, whichever occurs first. When an individual who is disqualified requests to rejoin an existing CalFresh household, the CWD must treat them as a returning household member and follow the existing process for adding a new household member.

As a reminder, the CWD must continue to screen all household members for exemptions and general CalFresh work requirements at recertification. If any previously noncompliant individual becomes eligible for an exemption or meets the work requirements at that time, the CWD must add them back to the CalFresh household.

CALFRESH DISQUALIFICATION DUE TO WORK REGISTRATION NONCOMPLIANCE

CalFresh policy for noncompliance with general work registration and disqualifications remains unchanged. Federal rules at [7 CFR 273.7](#) and state regulations at [MPP Section 63-407](#) establish work provisions for CalFresh. The general CalFresh work requirements are referred to as work registration, and those who are subject to work registration are referred to as "work registrants."

Work registrants who fail to comply with CalFresh work registration requirements without good cause may receive a CalFresh disqualification if they are not otherwise exempt. Per [7 CFR 273.7\(a\)](#), work registrants are required to:

- Participate in a mandatory Employment and Training (E&T) program if assigned by the CWD (however, in California, the CalFresh E&T program is voluntary, and participants are not disqualified due to noncompliance);
- Provide enough information to determine employment status or availability for work;
- Report to an employer when referred by the CWD or its designee;
- Accept a bona fide offer of suitable employment; and
- Not voluntarily quit a job of 30 or more hours a week, a job with earnings equivalent to the Federal minimum wage multiplied by 30 hours a week, or reduce work hours to fewer than 30 hours a week without good cause in accordance with regulations at [7 CFR 273.7\(j\)](#).

DETERMINING GOOD CAUSE

The CWD is responsible for determining if the noncompliant individual has good cause for failure to comply with general work requirements before imposing a disqualification for CalFresh. In determining if good cause exists for failure to comply with work registration requirements, the CWD must consider the facts and circumstances, including information submitted by the household and/or the employer. Per [MPP Section 63-407.51](#) and [ACL No. 23-30](#), good cause must include circumstances beyond the member's control, including, but not limited to:

- Illness;
- Illness of another household member requiring the presence of the work registrant;
- A household emergency;
- Lack of adequate childcare for children who have reached age six but are under twelve years of age;
- Lack of transportation;
- Declaration of disaster;
- Language barriers, including the inability to understand, speak, read, or write English;
- Discrimination or workplace rights violations; or
- Unpredictable or inconsistent employment hours.

Note: The CWD must thoroughly document the reason for the good cause determination in the case record. Verification of good cause is not required unless questionable, as outlined in [MPP Section 63-300.5\(g\)\(3\)\(C\)](#). A reason is questionable if it conflicts with prior statements, applications, or other information received. Examples of acceptable verifications include:

- Illness: The CWD may request a doctor's note or medical records.
- Transportation Issues: The CWD may request a repair invoice or statement explaining the issue.
- Household Emergency: The CWD may request a police report or childcare provider's letter.

If the household and the CWD are unable to obtain the requested verification because the cause for the quit or reduction in work effort stems from circumstances that cannot reasonably be verified, such as unreasonable demands by an employer or the employer being unavailable, the household must not be denied access to the program, as outlined in [MPP Section 63-300.5\(g\)\(3\)\(C\)](#).

Per [ACL No. 23-30](#), if good cause is due to a workplace rights violation, the household's statement is sufficient without reference to specific laws. The CWD must document the statement in the case record.

WORK REGISTRATION EXEMPTIONS

Prior to imposing a CalFresh disqualification for noncompliance with work requirements, the CWD must screen to determine whether the noncompliant individual is exempt from the CalFresh work registration requirements. A CalFresh disqualification may not be imposed on individuals who qualify for an exemption from work registration.

Per [MPP Section 63-407.21](#), the following individuals are exempt from the CalFresh work registration requirement:

- Under 16 or over 59 years of age;
 - a person age 16 or 17 who is not the head of a household, who is attending school, or enrolled in an employment training program on at least a half-time basis, is also exempt from work registration;
- Physically or mentally unfit for employment;
- Subject to and complying with any work requirement under Title IV of the Social Security Act, including CalWORKs programs;
- A parent of or responsible for the care of a dependent child under age 6 (note: the child does not have to be a CalFresh member or living in the home for this work registration exemption);
- Responsible for the care of an incapacitated person (note: the incapacitated person does not have to be a CalFresh household member or living in the home);
- Has applied for or is receiving unemployment insurance benefits;
- A regular participant in drug addiction or alcoholic treatment and rehabilitation program;
- Employed or self-employed at least 30 hours per week or receiving weekly earnings at least equal to the federal minimum wage multiplied by 30 hours;
- Enrolled in a school, training program, or institution of higher education on at least a half-time basis (students enrolled at least half-time in an institution of higher education must meet student eligibility requirements).

LENGTH OF THE CALFRESH DISQUALIFICATION PERIOD

The length of the CalFresh disqualification period is determined by the number of instances a work registrant has been previously disqualified from CalFresh for failure to comply without a good cause. As such, the CWD must consider previous CalFresh disqualifications and apply the applicable disqualification period specified below. The CWD must provide a timely notice of action to the household before applying the disqualification.

- First disqualification – one month
- Second disqualification – three months
- Third or subsequent disqualification – six months

The start date of the disqualification period must begin the first of the month following the month the individual is provided a timely notice of action unless a fair hearing is requested.

For households of one, when a work registrant is disqualified due to noncompliance, they will be discontinued from participating in CalFresh for the applicable period of time. For households of two or more, when a work registrant is disqualified due to noncompliance, the disqualified work registrant will be excluded from the CalFresh household for the applicable period of time, and their entire income and resources must continue to be counted when determining eligibility for the remaining household members as per [MPP Section 63-503.44](#). The remaining household members may continue receiving CalFresh benefits if otherwise eligible.

Households ineligible for Modified Categorical Eligibility (MCE), as outlined in [7 CFR 273.2\(i\)\(2\)\(vii\)](#), are those where the head of household has failed to comply with work requirements. Once the sanction period has expired and the household meets all other MCE eligibility criteria, MCE status may be conferred as per [ACL No. 14-56](#).

Note: Upon release of this letter, the CWD must not count previous instances of noncompliance with the work requirements of the CalWORKs WTW program, unemployment compensation, or substitute programs when determining the length of CalFresh disqualification.

ENDING A CALFRESH DISQUALIFICATION

Per [MPP Section 63-407.6](#), with each instance of a CalFresh disqualification, the work registrant remains ineligible until one of the following happens:

- The disqualification period has passed, and the disqualified work registrant meets work registration requirements;
- The disqualified work registrant has come into compliance during the disqualification period; or
- The disqualified work registrant qualifies for an exemption from work registration during the disqualification period.

When a disqualified individual meets one of the conditions listed above, the disqualification period must end, and the individual may regain eligibility for CalFresh. A previously disqualified individual may not be automatically re-approved for CalFresh. Reestablishing eligibility for CalFresh varies depending on the composition of the household.

For households of one that meet one of the conditions above, the previously disqualified individual must reapply by completing the application process and, if otherwise eligible, may be approved for CalFresh. If the individual reapplies in the final month of disqualification, the same application must be used to deny CalFresh for the remainder

of the disqualification period and prospectively determine eligibility for the following month.

For households of two or more, the previously disqualified individual may be added back to the existing household upon the household's request during the certification period, periodic report, or recertification, whichever occurs first. The previously disqualified individual, existing household members, or the household's Authorized Representative must contact the CWD to add the individual back to the existing household if otherwise eligible. When an individual who is disqualified requests to rejoin an existing CalFresh household, the CWD must treat them as a returning household member and follow the existing process for adding a new household member.

Standard effective date rules apply. For applications from individuals in a household of one, eligibility is effective the first of the month following the request. For individuals being added back to an existing household, eligibility is effective the first of the month following the request for mid-period changes, or at the start of the new certification period for SAR 7 or recertification.

When an individual is being added back to an existing CalFresh household or is reapplying as a household of one, the CWD must screen the individual to determine whether they qualify for an exemption from CalFresh work registration requirements, as outlined in [MPP Section 63-407.1](#).

NOTICING REQUIREMENTS

Per [MPP Section 63-407.52](#), within 10 days of discovering that a work registrant does not have a good cause for noncompliance with any of the CalFresh work registration requirements, the CWD must issue the CalFresh Notice of Denial/Disqualification for Failure to Meet the CalFresh Work Rules (CF 377.10). The CWD must issue the notice as soon as administratively possible with at least 10 days prior to imposing a disqualification, and the notice must comply with all of the following:

- Contain a specific description of the noncompliance act;
- Identify the minimum length of the CalFresh disqualification;
- Specify that any time the disqualified work registrant meets a work registration exemption, their disqualification will end, and they may reapply for CalFresh benefits;
- Specify the action that can be taken to avoid ineligibility before the disqualification period ends; and
- State that the disqualified work registrant may re-qualify for CalFresh benefits at the end of the disqualification period if otherwise eligible and the steps to do so.

REVISED CALFRESH NOTICE OF DISQUALIFICATION

The Food Stamp Notice of Denial/Disqualification Failure to Meet Food Stamp Work Rules (DFA 377.10) is updated to the [CalFresh Notice of Denial/Disqualification for Failure to Meet General CalFresh Work Rules \(CF 377.10\)](#). The revised notice contains updated program language and aligns with the current format and accessibility standards.

The CWD must issue the updated CalFresh Notice of Denial/Disqualification (CF 377.10) manually until the automation is completed. Upon release of this ACL, the Food Stamp Notice of Denial/Disqualification (DFA 377.10) will become obsolete.

QUALITY CONTROL AND MANAGEMENT EVALUATIONS

Federal regulations at [7 CFR 273.2\(f\)\(6\)](#) require that the case record provide sufficient documentation to support eligibility, ineligibility, and benefit level determinations. It is critical for the CWD to clearly document any actions taken on cases as well as any contacts or attempted contacts with the household.

Documentation must provide enough detail to permit a reviewer to determine if the action taken on the case was reasonable and accurate. Clear documentation is vital in presenting information that is not available in the data collection areas of the eligibility system. Case documentation must be sufficient in detail to permit a reviewer to determine the logic and accuracy of actions taken and to determine compliance with relevant state and federal law.

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 CWD must ensure effective bilingual services are provided. This requirement may be met through the 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 CWD 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, 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

**CALFRESH NOTICE OF DENIAL/
DISQUALIFICATION FOR
FAILURE TO MEET GENERAL
CALFRESH WORK RULES**

COUNTY OF _____

Notice Date : _____
Case Name : _____
Case Number : _____
Worker Name : _____
Worker Number : _____
Telephone Number : _____
Address : _____

(Addressee)

Questions? Ask your Worker.

State Hearing: If you think this action is wrong, you can ask for a hearing. Page two tells you how. Your benefits may not be changed if you ask for a hearing before this action takes place.

As of _____, the county is stopping benefits for _____
Date Client's Name

because you did not follow the general CalFresh work rules (listed below).

You will be disqualified for ☐ 1 ☐ 3 ☐ 6 month(s). The disqualification period will end on _____.
The amount of your household's CalFresh will be changed from \$_____ to \$_____.

Your CalFresh will stop because you did not:

- ☐ Keep your job or keep working at least 30 hours a week.
- ☐ Give the county information about your work history if you are able to work.
- ☐ Report to your employer for work.
- ☐ Accept a good job offer.

If you have a good reason for not meeting the general CalFresh work rules you must tell the county. The county may be able to excuse you from the work rules so you do not lose your CalFresh benefits.

Good reasons include things out of your control like illness, no childcare for a child younger than age 12, or work conditions that are unreasonable. If the county determines that you have a good reason, there will be no change to your CalFresh benefits. If you think you have a good reason for not meeting the general CalFresh work rules, contact the county as soon as possible at _____.

How to Keep Your CalFresh

By _____, you must give proof that you are meeting the general CalFresh work rules, or have a good reason for not meeting the work rules, or be excused from the general CalFresh work rules (see the following list).

You may be excused from the general CalFresh work rules if you are:

- Younger than age 16, or age 60 or older;
- Caring for a dependent child under age 6 (they do not have to live with you);
- Caring for a person with a disability (they do not have to live with you);
- Working at least 30 hours a week or earning at least \$_____ (current federal minimum wage x 30 hours) each week before taxes.
- Migrant and seasonal farm worker under contract or similar agreement with an employer or crew chief to be employed within 30 days.
- Getting or applying for unemployment benefits.
- Getting or applying for disability benefits from any source (disability benefits include, but are not limited to pensions, workers' compensation, disability insurance, Social Security, Supplemental Security Income, and veteran's benefits).
- Disabled or physically or mentally unfit for employment.
- Going to school, college, or a training program at least half-time (additional student eligibility rules may apply).
- Meeting work requirements for another program, like CalWORKs or General Assistance.
- In a drug or alcohol abuse treatment program.

Ask the county for help if you do not understand or know what you need to do to meet the general CalFresh work rules. If at any time, you think you may be excused for any of the reasons listed above, let the county know right away. The county may be able to excuse you from the general CalFresh work rules.

Here's How To Get Your CalFresh Back

- If your CalFresh stops for not meeting the general CalFresh work rules you will have to reapply for benefits if you are the only one in your household. If others in your household are getting CalFresh benefits then you can contact your county welfare department or worker to be re-added back to the benefits. To re-qualify, you must meet the general CalFresh work rules or be excused from the general CalFresh work rules before you can get CalFresh benefits again.
- You may reapply at any time once you meet the general CalFresh work rules, or become excused from the general CalFresh work rules, or once the disqualification period ends on _____.

Rules: These rules apply: CalFresh MPP Sections: 42-721, 63-407, 63-408. You may review them online at cdss.ca.gov or at your local county office.

YOUR HEARING RIGHTS

YOUR HEARING RIGHTS (See also PUB 412 at www.cdss.ca.gov/inforesources/state-hearings)

You can ask for a hearing if you disagree with a county/agency action or failure to act. You have **90 days** to do so, starting the day after the date of the notice. After 90 days, you must prove you had a good reason for asking late. You can also ask for a hearing to review your benefits for the past 90 days. If you ask for a hearing before the date of the change, your benefits will continue unchanged. CalFresh will end if you don't recertify when due.

- **Online** at acms.dss.ca.gov Click "Create an account" to have an ACMS account and get documents online; or click "Submit Appeal without Account" to file without an account **OR**
- **Call** toll free (800) 743-8525 (or TDD (800) 952-8349) **OR**
- **Fax** fill out this page/fax to (833) 281-0905 **OR**
- Fill out this page, and deliver it by one of the following:
 - o **In-person:** _____
 - o **Mail to:** CDSS State Hearings Division,
PO Box 944243, MS 21-37
Sacramento CA 94244-2430
 - o **Email to:** SHDCSU@DSS.ca.gov

HEARING REQUEST

1. My hearing issue involves _____ (benefit program) and _____ County/Agency.
2. I want a hearing because: _____
3. Print name of person who needs a hearing: _____ Birthdate: _____
4. Mailing Address: _____ Phone number: _____
I want to get hearing notices from the State Hearing Division by email. **Email Address:** _____
5. **Name/Signature:** _____ **Date Signed:** _____
6. Interpreter: I want a **free** interpreter for the _____ language or dialect.
7. Disability Accommodation for hearing? No Yes (explain): _____
8. Your Hearing will be scheduled by phone. If you want your hearing conducted by a different method, tell us how:
By Telephone By Video (*you see judge on your phone/computer*) In person at the county hearing site
I have no phone or Internet access. I want to go and use the phone or video at hearing site for my hearing.
9. I need a faster scheduled hearing due to Denial of CalWORKs or CalFresh emergency benefits
Medical Emergency Eviction/homelessness Other (explain): _____
10. If you timely appeal before the action listed in the notice takes place, your aid may stay the same. For CalWORKs (including Child Care) and CalFresh, if the county action was correct, you have to pay back any extra aid.
Check to have your aid lowered or stopped pending the hearing for: CalWORKs Childcare CalFresh
11. You can have a friend, relative, legal counsel or other person help with your hearing. **If they have agreed:**
Name: _____ Email: _____
Address: _____ Phone: _____
12. **To Get Help:** These groups below may be able to give you legal advice or represent you at the hearing: