

May 18, 2020

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

EXECUTIVE SUMMARY

ALL COUNTY WELFARE DIRECTORS LETTER

The purpose of this All County Welfare Directors Letter is to provide County Welfare Departments with guidance to implement the provisions of the federal blanket Quality Control (QC) waiver granted by the US Department of Agriculture, Food and Nutrition Service to suspend QC reviews for federal active and negative cases for the sample months of March, April, and May 2020 in response to the Coronavirus Disease 2019.



KIM JOHNSON
DIRECTOR

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



GAVIN NEWSOM
GOVERNOR

May 18, 2020

ALL COUNTY WELFARE DIRECTORS LETTER

TO: ALL COUNTY WELFARE DIRECTORS

FROM: JENNIFER HERNANDEZ, DEPUTY DIRECTOR
FAMILY ENGAGEMENT AND EMPOWERMENT DIVISION

SUBJECT: CALFRESH TEMPORARY WAIVER OF QUALITY CONTROL
(QC) REVIEWS FOR MARCH, APRIL, AND MAY 2020 DUE TO
CORONAVIRUS DISEASE 2019 (COVID-19)

REFERENCE: FAMILIES FIRST CORONAVIRUS RESPONSE ACT (HR 6201);
TITLE 7 OF THE CODE OF REGULATIONS (CFR) SECTIONS
275.11(b)(1); 275.11(b)(2); 275.12; 275.13; 275.23; AND 275.13;
275.

The purpose of this All County Welfare Directors Letter (ACWDL) is to provide County Welfare Departments (CWDs) with guidance to implement provisions of the federal Quality Control (QC) waiver granted by the US Department of Agriculture, Food and Nutrition Service (FNS). The waiver suspends QC reviews required pursuant to 7 CFR 275.12 and 275.13 for federal active and negative cases for the sample months of March, April, and May 2020 in response to the Coronavirus Disease 2019 (COVID-19).

California has experienced a rapid increase in the spread of COVID-19. As the number of COVID-19 cases in California continues to increase, extensive public health warnings have been issued statewide to reduce exposure, including orders to implement social distancing when conducting essential business. In an effort to protect applicants and recipients while supporting CWDs, this waiver will provide CWDs the flexibility needed to operate under the CalFresh eligibility waivers that have been granted by FNS and which have made normal QC procedures difficult to apply. This waiver is contingent upon the state and CWDs maintaining sufficient staff to perform all aspects of the QC

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review process starting with the June 2020 sample month, following regulations on staffing standards at 7 CFR 275.2(b).

Waiver Implementation Details

Under this waiver, the CDSS QC will not be reviewing federal active and negative cases for the sample months of March, April, and May 2020. This waiver does not apply to active state cases. Additional guidance on the sampled active state cases is forthcoming.

Households that were scheduled to have their cases reviewed in the months of March, April, or May 2020 will receive a notice from the CWD informing them that the review is no longer required. The CDSS QC will be providing performance measure counties (PMCs) a template letter. The template letter will be sent via a QC transmittal.

The CDSS QC will select federal cases from nine (9) months of the federal fiscal year instead of twelve (12) for QC review of payment accuracy and negative actions. The California minimum case sample requirement for active cases decreased from 1020 to 765 and negative cases decreased from 680 to 510. The attached waiver approval provides minimum sample size tables which replace the tables at 275.11(b)(1) and (2).

A QC transmittal is forthcoming with instructions on how to code the cases in the Supplemental Nutrition Assistance Program-Quality Control System (SNAP-QCS).

California will be required to provide FNS with data and analysis of the total number of households and the average amount of benefits received by the households that would have been subject to potential selection for the QC sample if it were not waived.

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

Attachment



Food and Nutrition
Service

1320 Braddock Place
Alexandria, VA
22314

Date: April 30, 2020

RE: Supplemental Nutrition Assistance Program (SNAP) –Waiver of Quality Control (QC) Reviews for March, April and May 2020 Due to the COVID-19 Public Health Emergency – Blanket Approval

Dear SNAP State agencies:

As authorized by SNAP regulations at 7 CFR 272.3(c)(1)(i), the Food and Nutrition Service (FNS) will allow State agencies to suspend:

- SNAP regulations at 7 CFR 275.11 (b)(1) and (2) by adjusting the minimum sample sizes for both active and negative cases for fiscal year 2020, as detailed in the enclosure. As a result of this blanket approval States will select cases from only nine months of the fiscal year for QC review.
- SNAP regulations at 7 CFR 275.12 and 275.13 by not requiring States to conduct QC reviews for active or negative cases for the sample months of March, April and May 2020.

Under the authority of 7 CFR 272.3(c)(1)(i), FNS may authorize temporary waivers to deviate from specific regulatory provisions when they cannot be implemented due to extraordinary temporary situations. FNS has received multiple requests from State agencies for various QC related flexibilities in response to the COVID-19 Public Health Emergency. Extensive certification policy waivers have already made normal QC procedures difficult to apply. FNS has determined that temporarily waiving the QC review is appropriate due to the COVID-19 Public Health Emergency.

Upon issuance of this waiver, all QC reviews for the sample months of March, April, and May 2020 will be cancelled, unless a State opts not to operate under the waiver. If a State agency elects not to implement this temporary flexibility, it must notify its respective FNS Regional Office, which will acknowledge receipt. State responses will be relayed to the FNS Quality Control Branch. All State agencies that choose to implement this waiver must comply with the conditions of approval included in the enclosure.

FNS is ready to provide technical assistance to State agencies as they seek to maintain operations and serve clients during the current public health emergency.

All State Agency Directors

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If you have any questions or need additional information, please contact your respective Regional Office representative.

Sincerely,

4/30/2020

X Ronald K. Ward

Ronald K. Ward

Director, Program Accountability and Administrati...

Signed by: Department of Agriculture

Enclosure

**TEMPORARY WAIVER OF THE QUALITY CONTROL REVIEW FOR MARCH,
APRIL AND MAY 2020**

- 1. Regulatory citation:** 7 CFR 275.12; 275.13; 275.11 (b)(1) and (2)
- 2. Regulatory requirements:** Supplemental Nutrition Assistance Program (SNAP) regulations at 7 CFR 275.12 and 275.13 require that State agencies conduct quality control reviews of active and negative cases on a monthly basis. 7 CFR 275.11(b)(1) and (2) provide the minimum sample sizes for the both the active and negative frames based on the State's average monthly reviewable SNAP caseload.
- 3. Description of alternative procedures:** State agencies will not conduct QC reviews for the active or negative frames for March, April and May 2020 and will adjust their minimum sampling size and any sampling procedures accordingly.
- 4. Action and reason for approval or denial:** Under the authority of 7 CFR 272.3(c)(1)(i), FNS may authorize temporary waivers to deviate from specific regulatory provisions when they cannot be implemented due to extraordinary temporary situations. FNS has determined that approval of these flexibilities is appropriate due to the COVID-19 Public Health Emergency. FNS is approving the flexibility for a period of 3 sample months, March through May, 2020.
- 5. Conditions of approval:** FNS is approving this flexibility subject to the following conditions:
 - State agencies will maintain sufficient State level staff to allow them to again perform all aspects of the QC review process starting with the June 2020 sample month, following regulations on staffing standards at 7 CFR 275.2(b).
- 6. Evaluation Data Requirements:** The State agency must provide to FNS the data and analysis listed below required for evaluation of this waiver:
 - The number of households that would have been subject to potential selection for the QC sample if it were not waived and the average dollar amount of benefits those households received.
- 7. Expiration date:** The sample month ending May 31, 2020.
- 8. Quality control procedures:** Adjusted minimum sample sizes are as follows and replace the minimum sample size tables included in regulations at 275.11 (b)(1) and (2) for the remainder of FY 2020.

7 CFR 275.11(b)(1)(ii) The minimum number of active cases to be selected and reviewed by a State agency during each annual review period shall be determined as follows:

Average monthly reviewable caseload (N)	Minimum annual sample size (n)
60,000 and over	n = 1800
10,000 to 59,999	n = $(300 + [0.042(N-10,000)]) * 0.75$
Under 10,000	n = 225

7 CFR 275.11(b)(1)(iii), The minimum number of active cases to be selected and reviewed during each annual review period as follows:

Average monthly reviewable caseload (N)	Minimum annual sample size (n)
60,000 and over	n = 765
12,942 to 59,999	n = $(300 + [0.0153(N-12,941)]) * 0.75$
Under 12,942	n = 225

7 CFR 275.11(b)(2)(i), The minimum number of negative cases to be selected and reviewed by a State agency during each annual review period shall be determined as follows:

Average monthly reviewable negative caseload (N)	Minimum annual sample size (n)
5,000 and over	n = 600
500 to 4,999	n = $(150 + [0.144(N-500)]) * 0.75$
Under 500	n = 112

7 CFR 275.11(b)(2)(ii), The minimum number of negative cases to be selected and reviewed during each annual review period as follows:

Average monthly reviewable negative caseload (N)	Minimum annual sample size (n)
5,000 and over	n = 510
684 to 4,999	n = $(150 + [0.1224(N-683)]) * 0.75$
Under 684	n = 112