

October 16, 2020

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

EXECUTIVE SUMMARY

ALL COUNTY WELFARE DIRECTORS LETTER

The purpose of this letter is to provide County Welfare Departments with information and guidance regarding the upcoming implementation of the Disaster Supplemental Nutrition Assistance Program, known as Disaster CalFresh (D-CalFresh) in California. California is approved to operate D-CalFresh in the following four counties: Butte, Napa, Santa Clara, and Sonoma.



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October 16, 2020

ALL COUNTY WELFARE DIRECTORS LETTER (ACWDL)

TO: ALL COUNTY WELFARE DIRECTORS

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

SUBJECT: DISASTER CALFRESH OCTOBER 2020: BUTTE, NAPA, SANTA CLARA, AND SONOMA COUNTIES

REFERENCE: [H.R. 6201 FAMILIES FIRST CORONAVIRUS RESPONSE ACT](#); [UNITED STATES DEPARTMENT OF AGRICULTURE, FOOD AND NUTRITION SERVICE DISASTER SNAP GUIDANCE](#); [ALL COUNTY WELFARE DIRECTORS LETTER \(ACWDL\) SEPTEMBER 1, 2020](#); [ACWDL OCTOBER 5, 2020](#); [ALL COUNTY LETTER \(ACL\) 19-55](#); [ACL 18-125](#); [ALL COUNTY INFORMATION NOTICE I-63-19](#)

The purpose of this letter is to provide County Welfare Departments (CWDs) with information and guidance regarding the upcoming implementation of Disaster Supplemental Nutrition Assistance Program (SNAP), known as Disaster CalFresh (D-CalFresh) in California. Due to the record number of wildfires burning in numerous counties throughout the state and the Presidential declaration of Major Disaster with Individual Assistance, California is approved to operate D-CalFresh in the following four counties: Butte, Napa, Santa Clara, and Sonoma. These four counties are referred to as the “impacted counties” throughout this letter.

D-CalFresh provides temporary food assistance to households affected by natural disaster. Eligible disaster impacted households who are not already receiving CalFresh at the time of the disaster will be provided with one month of food benefits.

To be eligible for D-CalFresh, a household must live or work in the disaster area at the time of the disaster, plan to purchase food during the benefit period, experience adverse effects due to the disaster, and meet the D-CalFresh income guidelines.

Based on the United States Department of Agriculture, Food and Nutrition Service (FNS) approval of California's D-CalFresh plan for October 2020, this letter provides information and guidance regarding general D-CalFresh policy, details specific to this October 2020 operation, pre-registration, outreach and administration.

DISASTER IMPACT AND CORONAVIRUS DISEASE 2019 (COVID-19) PANDEMIC EMERGENCY

Wildfires

Beginning on August 14, 2020, an extreme heat event struck California and surrounding western states, causing record-breaking temperatures and red flag warnings throughout the state. On August 17, 2020, multiple wildfires began burning due to the dry conditions, the heat wave, and numerous lightning storms. On August 18, 2020, California Governor Gavin Newsom declared a State of Emergency in response to the destructive wildfires. On August 22, 2020, California was granted a Presidential Declaration of Disaster with Individual Assistance for Lake, Monterey, Napa, San Mateo, Santa Cruz, Solano, Sonoma, and Yolo Counties. On September 13, 2020, Butte County was added to this Presidential Declaration. On September 28, 2020, Santa Clara County was added to this Presidential Declaration. Due to Butte and Santa Clara County being added later, and continuing wildfire activity in several counties, Butte, Napa, Santa Clara, and Sonoma Counties will operate D-CalFresh similarly to the first six counties as indicated in [All County Welfare Directors Letter released on October 5, 2020](#) but on a delayed timeline.

COVID-19 Pandemic Emergency

On March 19, 2020, California issued a statewide "Stay-at-Home" order, which led to a phased reopening beginning on May 8, 2020. While some restrictions have been lifted, many sectors remain closed to the public or are implementing revised operational strategies in order to adhere to social distancing protocols. These public health requirements make in-person D-CalFresh operations a challenge for both CWDs and clients alike. This D-CalFresh plan emphasizes a phone-based approach that focuses on maintaining the health and safety of those involved. Two flexibilities employed in this plan include phone interviews for D-CalFresh applicants and allowing telephonic signatures.

GENERAL D-CALFRESH POLICY

For a household to be eligible for D-CalFresh benefits, they must meet the following criteria:

- Lived or worked in the disaster area at the time of the disaster;
- Purchased or planned to purchase food during the benefit period;
- Experienced an adverse effect due to the disaster; and

- Meet the Disaster Gross Income Limit (DGIL).

Residency or Work

To be eligible for D-CalFresh, a household must have lived or worked in the disaster area at the time of the disaster. Households are eligible if they are temporarily residing outside of the disaster impacted county, such as those displaced due to mandatory evacuations, at the time of application. Households must be residing in California at the time of application to remain eligible for D-CalFresh.

Purchasing Food

To be eligible for D-CalFresh, a household must have purchased or planned to purchase food during the benefit period.

Adverse Effects

To be eligible for D-CalFresh, a household must have experienced an adverse effect due to the disaster. Adverse effects include food loss, loss of income, inaccessible resources, or incurred disaster-related expenses. The household must have experienced one or more of these adverse effects.

Disaster Gross Income Limit

Unlike regular CalFresh, which includes a separate test for income and resources, the DGIL groups income and resources together under one test. The household's take home income received (or expected to be received) during the benefit period plus its accessible liquid resources minus disaster related expenses (unreimbursed disaster related expenses paid or anticipated to be paid out of pocket during the disaster benefit period) must not exceed the DGIL.

When determining the DGIL, it is recommended that CWDs ask specific questions about potential loss of income or disaster expenses. For example, did the household lose wages, incur expenses securing temporary shelter or replacing personal and household items, such as clothing. It may be difficult for individuals and families impacted by a disaster to recall all deductible expenses given the stressful nature of the situation. Disaster expenses include expenses that the household has paid or expects to pay out-of-pocket during the disaster benefit period. If the household has received or anticipates receiving a reimbursement for these expenses during the disaster period, only the net expense is deductible.

D-CalFresh Household Composition

A D-CalFresh household includes those people who lived together and purchased and prepared food together on the start date of the disaster. A D-CalFresh household does not include those people with whom the applicant is temporarily staying with at the time of application due to the disaster.

A D-CalFresh household may include an individual(s) who had been excluded from an ongoing CalFresh household at the time of the disaster. For example, an ineligible student, who was excluded from a CalFresh household at the time of the disaster may apply for D-CalFresh if they meet the eligibility criteria (described below). The previously excluded individual must complete the D-CalFresh application, including the interview and submission of required verifications.

D-CalFresh Verification

Verification rules are eased during a disaster. Eligibility staff should exercise reasonable judgment when evaluating the accuracy of applicant statements. D-CalFresh has three verification requirements:

1. Identity must be verified;
2. Residency and loss/inaccessibility of income or liquid resources should be verified if possible; and
3. Household composition and food loss, if questionable.

While identity verification is required, a specific type of documentary proof is not. Acceptable identity verification may include, but is not limited to, a driver's license, a work or school identification card, an identification card for health benefits, a voter registration card, a foreign passport, and "matricula consulares." If documentary proof is not available, identity may be verified through collateral contact. Please note that a social security number is not required to apply for D-CalFresh.

To the extent possible, verification of residency should be accomplished via information from other sources, such as a rent or mortgage billing statement, utility billing statement, and identity documents. No specific type of documentary proof is required.

Each disaster is unique, and the availability of verification will vary from household to household. Public information should indicate that applicants are expected to bring all available verification documents. CWDs should assist households in securing necessary verifications, especially if documents have been lost due to the disaster. This may include, with the client's permission, verifying information through alternative sources such as online banking or utility accounts and using collateral contacts when appropriate. If verification is not readily available due to unusual circumstances caused by the disaster, such as structure loss or evacuation, eligibility staff will assist the applicant in securing necessary verifications.

Benefit Issuance

Certified households should be able to access their benefits within 72 hours of application (except in cases of delayed issuance for questionable applications).

For additional detailed guidance on D-CalFresh eligibility, the DGIL and determining the D-CalFresh allotment, reference the [Disaster SNAP Guidance](#) released by the FNS.

Authorized Representative

An Authorized Representative (AR) may be used for D-CalFresh following the same policy rules as regular CalFresh. As an adult non-household member who is authorized to act on behalf of a household, an AR is rightfully able to:

- Complete a D-CalFresh application for a household;
- Submit the necessary verification requirements for a household; and/or
- Use the Electronic Benefits Transfer (EBT) card to purchase food for the household.

An individual AR may represent more than one impacted household. The designation of an AR can be established on the D-CalFresh application form, using the regular CalFresh AR designation form, or via a signed written statement from the household. If the household requires an AR to submit the application on their behalf, the identity of both the AR and responsible household member must be verified. Detailed information regarding AR restrictions and responsibilities can be found in [All County Letter \(ACL\) 19-55](#) released on May 31, 2019.

Duplicate Participation

Disaster impacted counties must screen for duplicate participation before issuing D-CalFresh benefits. Households may not receive D-CalFresh and regular CalFresh benefits at the same time. Additionally, households may only be approved for D-CalFresh once during the benefit period. CWDs will reference the Statewide Automated Welfare System (SAWS) and Medi-Cal Eligibility Data System (MEDS) to determine duplicate participation before completing the D-CalFresh eligibility determination.

Employee Applications

County employee cases will be processed by lead workers or unit supervisors who currently work confidential cases. All CWD employee cases will be reviewed after the disaster period. These cases will be tracked at application and sorted accordingly to ensure review. No other staff will have access to employee cases and the lead worker or unit supervisor working the case will not be in the same unit as the aided employee.

OCTOBER 2020 D-CALFRESH OPERATION

The following details are specific to the upcoming D-CalFresh operation in Butte, Napa, Santa Clara, and Sonoma Counties.

Application Period

The application period for people affected by the disaster in Butte, Napa, and Sonoma Counties extends through seven non-consecutive days:

- Wednesday, October 28 through Friday, October 30, 2020, and
- Monday, November 2 through Thursday, November 5, 2020.

The application period for people affected by the disaster in Santa Clara County extends through seven non-consecutive days:

- Monday, November 2 through Friday, November 6, 2020, and
- Monday, November 9 through Tuesday, November 10, 2020.

D-CalFresh Benefit Period

The benefit period for people affected by the disaster in Napa, Santa Clara and Sonoma Counties is August 14 through September 12, 2020. The benefit period for people affected by the disaster in Butte is September 7 through October 6, 2020.

D-CalFresh Application

D-CalFresh applicants must complete the *Application for Disaster CalFresh* (CF 385) and it must be submitted during the D-CalFresh application period. For this operation, the D-CalFresh application can be submitted by phone, online, or in-person. Due to the limited D-CalFresh application period, D-CalFresh applications will not be accepted through the mail.

Signature Flexibility

When accepting D-CalFresh applications by phone, disaster impacted counties will document in the case file that a client verbally attested to the information provided on the application. The disaster impacted counties will document the applicant's name, date and time of application, a summary of the information to which the client verbally assents, and the applicant's response indicating agreement or disagreement (i.e. Yes or No). Such documentation will fulfill the requirements for a signed application for households who apply over the phone or who have applied without a signature. Additionally, if the household submitted a paper application without a signature, then the CWD must also note on the paper application that verbal attestation of the signature was given.

Interviews

Due to public health requirements related to COVID-19, for this operation D-CalFresh interviews will be completed by phone.

D-CalFresh Household Composition

D-CalFresh household composition is established as of the start date of the disaster. In this case, the start date of the disaster for Napa, Santa Clara and Sonoma Counties is August 14, 2020. The start date of the disaster for Butte County is September 7, 2020.

Verification Submission

D-CalFresh applicant households will have several options for submitting verifications. Options include submission via the D-CalFresh pre-registration tool, the SAWS client portals, secure email or fax, and submission at in-person application sites.

D-CalFresh Allotment

Because the disasters covered for this operation officially started in Federal Fiscal Year (FFY) 2020, the FFY 2020 D-CalFresh DGIL and allotments will be used. The DGIL and allotment by household size were released by [All County Information Notice \(ACIN\) I-63-19](#) released on October 14, 2019.

Electronic Benefits Transfer (EBT)

D-CalFresh benefits will be issued through the statewide EBT system. Regardless of the method of application submission, households who have been determined eligible for D-CalFresh will pick up their cards in person at designated EBT card pick-up locations in order to meet the D-CalFresh three-day timeframe. D-CalFresh pick up will be coordinated at the time of the eligibility determination.

If a D-CalFresh eligible household is displaced or no longer residing in the disaster impacted county, the county will coordinate with the county where the household is currently located to allow the household to obtain the EBT card within the three-day timeframe. The disaster impacted county will coordinate with the county where the household is located and will send the necessary information to the local EBT printer. This will allow the displaced household to quickly and securely pick up their EBT card without requiring them to return to the impacted disaster area.

Some counties have requested pre-printed and pre-embossed EBT cards. These cards will say "Disaster" in the place of the applicant's name.

D-CalFresh Three-Day Timeframe

For this operation, the D-CalFresh three-day timeframe will start on the day of the interview. The day an applicant completes their interview with eligibility staff will be considered the filing date of the application, regardless of the date of pre-registration or application submission.

Ongoing CalFresh Households

Ongoing CalFresh households are not eligible to receive supplemental D-CalFresh benefits under this plan, as they are already receiving Emergency Allotments due to COVID-19 and are at the maximum allotment for their household size.

OCTOBER 2020 PRE-REGISTRATION

For the first time, D-CalFresh eligible households will be able to pre-register for D-CalFresh. Pre-registrations will be accepted in Butte, Napa, and Sonoma Counties from Wednesday, October 21 through Tuesday, October 27, 2020. Pre-registrations will be accepted in Santa Clara County from Monday, October 26 through Friday, October 30, 2020.

Pre-registration will allow households to let their county know they are interested in applying for D-CalFresh during the upcoming application period and submit some of the required D-CalFresh application information in advance, including submission of verifications. Households who pre-register will be called to complete a phone application and phone interview during the application period based on the order in which their pre-registration was received. Counties will attempt to call pre-registrants to complete the application and interview by phone a minimum of three times during the application period. If the three attempts by the county to contact the household who had pre-registered are unsuccessful, the household will need to call the county to apply by phone, apply online, or in-person during the application period.

The pre-registration assistance tool will be available in English and Spanish and can be completed by phone or text message. The tool is designed to be used on any device and does not require a smart phone, data plan, or wi-fi connection.

The pre-registration assistance tool is not the D-CalFresh application, but rather a way for counties to gather information which allows for more efficient phone-based application processing. D-CalFresh pre-registration does not “start the clock” on a D-CalFresh application.

Pre-registration is not required but is highly encouraged. Clients who do not have phone access will be able to access D-CalFresh services in-person if necessary.

D-CALFRESH OUTREACH

Outreach is an essential component of the CalFresh disaster response. The CDSS will provide D-CalFresh information for this operation on the CDSS webpage <https://www.cdss.ca.gov/inforesources/calfresh/disaster-calfresh>.

The CDSS will also issue public facing materials such as a press release, flyers, visual guides, and social media posts. All public facing materials will be provided to counties in English and Spanish.

D-CALFRESH ADMINISTRATION

D-CalFresh Daily Reporting Requirements

A State operating D-CalFresh must submit a daily report to FNS.

Before the start of the application period, the CDSS will provide the total number of telephonic pre-registrations received in each approved county.

During the application period, the CDSS will provide daily reports, as well as a summary report after operations end, with the following information for each approved county:

- The number of online applications received.
- The number of paper applications received.
- The number of households and persons approved for D-CalFresh
- The amount of disaster benefits issued to approved households.
- The number of households denied based on their eligibility.
- The average issuance amount per household.

During the application period, the CDSS will provide FNS with a daily narrative describing the status of, and any updates to, its telephone interview operations.

To meet this requirement, impacted counties must submit daily reports beginning the day following the first day of D-CalFresh operations and on a daily basis until all applications are processed. Reports must be submitted each day even if no or very few D-CalFresh applications have been submitted. Each county operating D-CalFresh will work with the CDSS to fulfil this requirement.

Other D-CalFresh Reporting Requirements

D-CalFresh cases and their benefits **should not** be reported on the *Food Stamp Program Participation and Benefit Issuance Report* (DFA 256) or the *CalFresh Monthly Caseload Movement Statistical Report* (CF 296).

Administrative Claiming

Administrative costs related to D-CalFresh should be claimed in accordance with normal CalFresh processes. Costs should be tracked as described in [County Fiscal Letter \(CFL\) 17/18-31](#) released on October 13, 2017. Any questions regarding this CFL should be directed to Fiscal.Systems@dss.ca.gov.

Post-Disaster D-CalFresh Quality Control (QC) Review

FNS requires the State conduct a comprehensive review of general D-CalFresh program performance and reviews of individual cases. The individual case reviews must consist of a random sample of 0.5 percent of D-CalFresh cases (minimum of 25, maximum of 500), both approved and denied. In addition, the State is required to complete a review of 100 percent of CWD employee cases that were approved for and received D-CalFresh benefits. Outcomes of the D-CalFresh QC review process will have no impact on the State's annual CalFresh error rate.

Due to the unique nature of this operation, the CDSS will also review a statistically significant percentage of households certified through telephone interviews as part of its Post-Disaster Report. FNS will specify this amount for the CDSS after operations ends.

If you have any questions about this ACWDL or D-CalFresh guidelines and regulations, please contact CalFreshPolicy@dss.ca.gov.