

October 21, 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 following state options under the Continuing Appropriations Act, 2021 and Other Extensions Act as part of the continued Coronavirus Disease 2019 response efforts: a waiver of the initial application and recertification interview (if certain criteria are met) and a waiver of the requirement to conduct a face-to-face interview if requested by the household, effective upon release of this letter through June 30, 2021.



**KIM JOHNSON**  
DIRECTOR

STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY  
**DEPARTMENT OF SOCIAL SERVICES**  
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**GAVIN NEWSOM**  
GOVERNOR

October 21, 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 IN RESPONSE TO  
CORONAVIRUS DISEASE 2019: INITIAL AND  
RECERTIFICATION INTERVIEWS

**REFERENCE:** [H.R. 8337 CONTINUING APPROPRIATIONS ACT, 2021 AND  
OTHER EXTENSIONS ACT; TITLE 7 CODE OF FEDERAL  
REGULATIONS \(CFR\) 273.2\(a\)\(2\); 273.2\(e\); 273.2\(e\)\(2\)\(i\);  
273.2\(f\)\(1\); 273.14\(b\)\(3\); MANUAL OF POLICIES AND  
PROCEDURES \(MPP\) 63-300.5\(e\); MPP 63-300.5\(e\)\(3\); ALL  
COUNTY LETTER 20-48; ALL COUNTY INFORMATION NOTICE  
I-45-11](#)

The purpose of this All County Welfare Directors Letter (ACWDL) is to provide County Welfare Departments (CWDs) with guidance to implement the provisions of the following state options under the Continuing Appropriations Act, 2021 and Other Extensions Act as part of the continued Coronavirus Disease 2019 (COVID-19) response efforts:

- Waiver of the initial application and recertification interview (if certain criteria are met), effective upon release of this letter through June 30, 2021; and
- Waiver of the requirement to conduct a face-to-face interview if requested by the household, effective upon release of this letter through June 30, 2021.

California's statewide "Stay-at-Home" order was issued on March 19, 2020. While California has started to implement its "Pandemic Resilience Roadmap," outlining the four stages for modifying the order, statewide data demonstrates the need for continued health and safety precautions to reduce the spread of COVID-19. As of August 28, 2020, California has implemented a new "Blueprint for a Safer Economy," a statewide

plan for reducing COVID-19 cases with revised criteria for equitably reopening the state based on data and that informs loosening or tightening restrictions on certain activities.

In addition to current health and safety risks facing our clients and workforce, Californians have also experienced increased need due to the economic impacts of COVID-19. It is critical that CWDs process new CalFresh applications with limited in-person contact and as quickly as possible to provide CalFresh benefits and access to food to all qualifying Californians impacted by COVID-19.

In an effort to protect our clients and workforce, further the goal of an equitable reopening as outlined in the Blueprint for a Safer Economy, and support CWDs in maintaining access to benefits, these waivers provide the flexibility needed to operate CalFresh effectively during the ongoing pandemic emergency.

### **CalFresh Interviews**

California is implementing two statewide waivers related to the CalFresh interview requirements. Both waivers, as detailed below, are effective upon release of this letter through June 30, 2021. Waiver authority may be applied to any CalFresh case pending an interview at the time of the release of this letter, even if the application was submitted before the release of this letter.

#### *Waiver of Initial Certification and Recertification Interview*

Federal regulations at [7 CFR 273.2\(a\)\(2\)](#), [273.2\(e\)](#) and [273.14\(b\)\(3\)](#) require households to complete an interview at initial certification and recertification. Under this waiver, CWDs must waive the interview requirement if the CWD has verified the identity of the applicant and has completed all mandatory verifications as detailed at [7 CFR 273.2\(f\)\(1\)](#) and [Manual of Policies and Procedures \(MPP\) 63-300.5\(e\)](#). If the CWD deems that any of the information provided on the application is questionable or cannot complete identity verification or other mandatory verifications, an interview will be required.

A household entitled to Expedited Service (ES) and identity has been verified within the three-day ES timeframe will have their initial interview waived prior to benefit issuance. The requirement to grant benefits within the three-day ES timeframe and postpone any missing mandatory verifications stands. Because verification requirements and policy have not changed under this waiver, the CWD must complete all mandatory verifications as detailed at [7 CFR 273.2\(f\)\(1\)](#) and [MPP 63-300.5\(e\)](#) that have been postponed due to the household's ES entitlement. If an ES entitled household, whose interview has been waived, does not provide the missing mandatory verifications as requested by the CWD, the household will be discontinued per existing CalFresh policy.

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For purposes of verifying the identity of the applicant, CWDs must accept any readily available documentary evidence which reasonably establishes the applicant's identity, and if documentary evidence is not readily available, may verify identity through a collateral contact. CalFresh identity verification policy has not changed under this waiver. See [MPP 63-300.5\(e\)\(3\)](#) and [All County Information Notice \(ACIN\) I-45-11](#) issued on October 28, 2011.

For purposes of completing other mandatory verifications, CWDs are reminded to proactively use electronic verification when available. Verification requirements and verification policy have not changed under this waiver. See [MPP 63-300.5\(e\)](#) and [ACIN I-45-11](#).

Given the significant job loss that has occurred as a result of COVID-19, CWDs are also reminded that verification of job loss is not a mandatory verification for CalFresh. Verification of job loss should only be requested if the job loss is questionable. For additional guidance regarding verification of income and how to address reports of no income and job loss, refer to [All County Letter 20-48](#) issued on April 22, 2020.

If the county determines that any of the information provided on the application is questionable/incomplete or cannot complete identity verification or other mandatory verification, then an interview is required. If an interview is required, the county must document in the case record the reason (e.g. missing verification, questionable information).

*Waiver of Requirement to Conduct a Face-to-Face Interview if Requested*

For those households whose interviews cannot be waived, CWDs may require the household to complete a telephone interview even if a face-to-face interview is requested by the household. The requirement to conduct a face-to-face interview if requested by a household at [7 CFR 273.2\(e\)\(2\)\(i\)](#) has been waived. When a request for a face-to-face interview is denied, the CWD must adequately explain to the client that this request is being denied due to public health precautions that have been implemented statewide to reduce COVID-19 exposure.

*Case Narration*

When implementing these waivers, adequate case narration is essential. Case narration, including a reference to "COVID-19 waiver" will allow case reviewers to determine that all CalFresh requirements have been met under waiver authority. Especially when requiring verification of questionable information, CWDs are reminded to adequately document the case record.

## **Quality Control**

No special Quality Control procedures are required for cases subject to the provisions of these waivers. Cases should be reviewed using standard review procedures contained in the Food and Nutrition Service (FNS) Handbook 310.

## **Reporting Requirements**

As a condition of these waivers, CDSS must report to FNS within 45 days of waiver expiration the outcomes of the waivers. To fulfill this reporting requirement, the CDSS will develop an electronic survey that must be completed by all counties by July 31, 2021. If the waiver is extended, the CDSS will adjust the survey due date accordingly.

The electronic survey will request the following information from CWDs for each waiver implemented:

- Estimated number of households affected by implementation of the waiver;
- A narrative on the effect of the waiver on program access and client satisfaction, including an analysis of any client or advocate complaints received related to the implementation of the waiver;
- A narrative on the effect of the waiver on providing timely and accurate benefits; and
- A narrative on the effect of the waiver implementation on any other aspects of the eligibility process including the ability to manage staff caseload growth and the impact on administrative efficiency.

If you have questions or need additional guidance regarding the information in this letter, contact the CalFresh Policy Section at [CalFreshPolicy@dss.ca.gov](mailto:CalFreshPolicy@dss.ca.gov).

Sincerely,

### ***Original Document Signed By:***

JENNIFER HERNANDEZ  
Deputy Director  
Family Engagement and Empowerment Division