

July 1, 2021

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 regarding three federal waivers that, in response to the Coronavirus emergency pandemic, have been extended until December 31, 2021: a waiver of the initial application and recertification interview (if certain criteria are met); a waiver of the requirement to conduct a face-to-face interview if requested by the household; and a waiver of the recording requirement for telephonic signatures (if certain criteria are met). This letter also addresses the approval of the waiver of the requirements to conduct a face-to-face interview for Quality Control active case reviews.



KIM JOHNSON
DIRECTOR

STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
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July 1, 2021

ALL COUNTY WELFARE DIRECTORS LETTER

TO: ALL COUNTY WELFARE DIRECTORS

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

SUBJECT: CALFRESH EXTENSION OF WAIVERS IN RESPONSE TO
CORONAVIRUS: INITIAL AND RECERTIFICATION INTERVIEW, FACE-
TO-FACE INTERVIEW, TELEPHONIC SIGNATURE, AND QUALITY
CONTROL FACE-TO-FACE INTERVIEW WAIVER

REFERENCE: [UNITED STATES DEPARTMENT OF AGRICULTURE \(USDA\)
FOOD AND NUTRITION SERVICE \(FNS\) MEMO - EXTENSION
OF SNAP COVID-19 ADMINISTRATIVE FLEXIBILITIES, MAY
2021 AND BEYOND DATED APRIL 30, 2021; USDA FNS MEMO -
QUALITY CONTROL \(QC\) SYSTEM RESUMES NATIONWIDE
JULY 2021: EXPECTATIONS, SPECIAL REVIEW PROCEDURES
AND OPTIONAL FACE-TO-FACE INTERVIEW WAIVER DATED
APRIL 30, 2021; TITLE 7 CODE OF FEDERAL REGULATIONS
\(CFR\) 273.2\(e\)\(2\)\(i\); 7 CFR 275.12\(c\)\(1\); ALL COUNTY WELFARE
DIRECTORS LETTER \(ACWDL\) APRIL 2, 2020; ACWDL MAY 28,
2020; ACWDL OCTOBER 21, 2020; ACWDL APRIL 15, 2021](#)

The purpose of this All County Welfare Directors Letter (ACWDL) is to provide County Welfare Departments (CWDs) with guidance regarding current CalFresh waiver authority granted in response to the Coronavirus pandemic emergency. Waiver authority is requested by the California Department of Social Services (CDSS) and approved by the United States Department of Agriculture, Food and Nutrition Service.

Waiver Extensions

The following waivers are **extended until December 31, 2021, unless otherwise communicated by CDSS:**

- a waiver of the initial application and recertification interview (if certain criteria are met);
- a waiver of the requirement to conduct a face-to-face interview if requested;
- a waiver of the recording requirement for telephonic signatures (if certain criteria are met); and

Importantly, the waiver of the recording requirement for telephonic signatures (if certain criteria are met) applies to both initial application and recertification.

For detailed guidance on implementation of these waivers, refer to the [ACWDL issued on April 2, 2020](#); [ACWDL issued on May 28, 2020](#); [ACWDL issued on October 21, 2020](#); and QC Transmittal 20-06.

Policy Change: 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. However, CWDs may only deny a request for a face-to-face interview once the CWD has confirmed that the household has access to a telephone or if the CWD provides access to a telephone (i.e., phone set-up in the office). If the household does not have access to a telephone or the CWD cannot provide access, then the CWD must conduct a face-to-face interview. Also, CWDs must continue to conduct face-to-face interviews as reasonable accommodations if requested by individuals with disabilities that impair ability to communicate via telephone. As a reminder, 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.

Quality Control Face-to-Face Interview Waiver for July 2021 to December 2021

Federal QC case reviews will resume for the sample month of July 2021. FNS has approved a waiver of the requirement at [7 CFR 275.12\(c\)\(1\)](#) to conduct a face-to-face interview for QC active case reviews for the period of July 1, 2021, through December 31, 2021. This waiver will allow Performance Measurement Counties the flexibility to conduct telephone interviews in lieu of face-to-face interviews for all QC interviews conducted through December 31, 2021, regardless of sample month.

A QC Transmittal is forthcoming to address this topic in more detail.

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 February 28, 2022. If the waiver expires sooner than anticipated or 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.

State Emergency Declaration Requirement

The approval to extend these waivers until December 31, 2021 comes with a requirement for the State to confirm the presence of a State emergency or disaster declaration (State declaration) at 3-month intervals, or until the end of the month subsequent to the month in which the public health emergency declaration related to COVID-19 is lifted by the Secretary of Health and Human Services, whichever comes first. CDSS must confirm the continued presence of the State issued emergency declaration at 3-month intervals before these waivers can be continued beyond the third month. Without confirmation of the declaration, the adjustment will be terminated at the end of the third month.

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