

DEPARTMENT OF SOCIAL SERVICES

744 P Street, Sacramento, California 95814



February 25, 2004

ALL COUNTY INFORMATION NOTICE NO. I-10-04

TO: ALL COUNTY WELFARE DIRECTORS
ALL CalWORKs PROGRAM SPECIALISTS
ALL FOOD STAMP COORDINATORS
ALL COUNTY DISTRICT ATTORNEYS
ALL COUNTY CHILD CARE COORDINATORS
ALL CAL-LEARN COORDINATORS
ALL COUNTY REFUGEE COORDINATORS
ALL COUNTY WELFARE TO WORK COORDINATORS
ALL COUNTY WELFARE FRAUD CHIEF INVESTIGATORS
ALL CAL-LEARN CASE MANAGEMENT AGENCIES
ALL CONSORTIUM PROJECT MANAGERS
ALL MEDI-CAL PROGRAM SPECIALISTS
ALL TRIBAL TANF PROGRAM SPECIALISTS
ALL QUALITY CONTROL PROGRAM COORDINATORS
ALL CASH ASSISTANCE PROGRAM FOR IMMIGRANTS COORDINATORS

REASON FOR THIS TRANSMITTAL

- State Law Change
- Federal Law or Regulation Change
- Court Order
- Clarification Requested by One or More Counties
- Initiated by CDSS

SUBJECT: CALIFORNIA WORK OPPORTUNITY AND RESPONSIBILITY TO KIDS (CalWORKs) AND FOOD STAMP (FS) PROGRAMS QUARTERLY REPORTING AND PROSPECTIVE BUDGETING (QR/PB) QUESTIONS AND ANSWERS

REFERENCE: ASSEMBLY BILL (AB) 444, CHAPTER 1022, STATUTES OF 2002; AB 1402, CHAPTER 398, STATUTES OF 2003; ALL COUNTY LETTER (ACL) 03-18 DATED APRIL 29, 2003; ALL COUNTY INFORMATION NOTICE I-54-03 DATED AUGUST 27, 2003; ALL COUNTY INFORMATION NOTICE I-84-03 DATED DECEMBER 24, 2003

The purpose of this letter is to transmit another series of Questions and Answers (Q&As) regarding the Quarterly Reporting/Prospective Budgeting (QR/PB) System in the CalWORKs and Food Stamp (FS) programs. As questions are submitted by county and consortia representatives, the California Department of Social Services (CDSS) management and program staff review the questions and develop QR/PB policies and responses with input from members of the County Welfare Directors Association (CWDA) who participated with staff from the CDSS in a Quarterly Reporting Workgroup.

As additional QR/PB questions are received and responses developed by CDSS, they will be released in subsequent All County Information Notices and posted on the Quarterly Reporting (QR) website which allows counties to view responses to questions they have regarding QR.

If you have any questions regarding the QR/PB system, you may contact the following CDSS staff:

QR/PB Q & As	Rosie Avena (916) 654-1514
CalWORKs Policy	Paulette Dreher (916) 654-3386
CalWORKs Forms, Notices	Shawn Bradley (916) 653-8675
Food Stamps Policy	LeAnne Torres (916) 654-2135
FSP Forms and Notices	FS Policy Implementation (916) 654-1430
Fraud Policy	Mark Gagnon (916) 263-5735
IEVS Matches	Nanci O'Brien (916) 263-5713
FSET /ABAWDs	Robert Nevins (916) 654-1408
WTW Program	Milt Yee (916) 657-3399
Work Support Services (WSS)	WSS analyst (916) 654-1424
Cal-Learn/Teen Programs	Consultants (916) 657-4249
Child Care	Suzanne McNamee (916) 657-3815
Department of Health Services (DHS)	Beth Fife (916) 657-0710
Food Stamp Quality Control	Robert Nevins (916) 654-1408
Refugee Cash Assistance	Camille Ancona (916) 653-7785
TANF Data Collection	Warren Ghens (559) 445-6478

Sincerely,

Original signed on 02/25/04 by:

CHARR LEE METSKER, Chief
Employment and Eligibility Branch

RICHTON YEE, Chief
Food Stamps Branch

Attachment

c: CWDA
CSAC

CALIFORNIA WORK OPPORTUNITY AND RESPONSIBILITY TO KIDS (CalWORKs) AND FOOD STAMP (FS) PROGRAMS QUARTERLY REPORTING AND PROSPECTIVE BUDGETING (QR/PB) QUESTIONS AND ANSWERS

1. **In a county that uses terminal digits to assign payment quarters, a CalWORKs/FSP applicant with income applies in the third month of the quarter (December).**

A. Should we factor in his income for the third month even if the income is ending in that same month?

B. What if the applicant applied in the first month of his quarter, and the income is ending in that same month?

Answer:

A: If applicant eligibility exists (see Question 1 in ACIN I-84-03), the December grant is calculated using actual December income. The next step is to determine benefits for the upcoming payment quarter. Reasonably anticipated income for January, February, and March is used. Since the December income is ending, it is not used for the January, February, and March quarter.

B. If the applicant applies in the first month of the quarter and is eligible, the reasonably anticipated income for the AU/HH for the application month and the next two months is averaged to determine the benefit level for the QR payment quarter.

2. **When a recipient reports he is moving out of state, the ACL states to discontinue the case at the end of the month for which a 10-day notice can be provided. Does this mean the entire AU/HH or just an individual? If it were for an individual only, this would mean the benefits would decrease mid-quarter.**

Answer: If the individual changes residence to another state, the individual would be discontinued and the case would be discontinued only if the remaining AU/HH does not remain eligible. A mid-quarter decrease or discontinuance is required in this situation because the individual(s) has moved out of state and is no longer a California resident and would not be eligible for benefits in California. If the entire AU/HH changes residence to another state the AU/HH would be discontinued mid-quarter.

3. **Will CWDs be required to send a No Change NOA to the AU/HH after the AU/HH has voluntarily notified the CWD of acquiring property mid-quarter? If so, should the NOA include a reminder for the AU/HH to report the property on the next QR 7 and require the AU/HH to show the spend-down of that property if the AU/HH no longer has the property?**

Answer: Yes, the CWD must send a No Change NOA if the AU/HH has voluntarily reported new resources/property mid-quarter. The No Change NOA includes language that reminds the recipient to report this information on the next QR 7 submitted. CDSS will not include spend-down language on the No Change NOA; however, if a county wishes to add spend-down language on its No Change NOAs, it may do so with CDSS review and approval.

4. **A. When aid has been approved for a child who is currently being aided in another household, the county can take action mid-quarter. Is this just for a child, or is it any individual?**
B. Will an administrative error overpayment result when an eligible child has been removed from the home and placed in FC and the county agency (SSW) fails to notify the EW that the child was removed?

Answer:

A. This rule applies for adults as well as children. The CWD cannot pay duplicate aid for an individual. A request for aid in a second AU/HH would constitute a request for discontinuance from the original AU/HH for that individual. In CalWORKs and Food Stamps, aid cannot be approved in the second case until the first of the month following discontinuance from the first AU/HH.

B. CalWORKs would assess an administrative overpayment only if CalWORKs pays aid beyond the end of the month in which the child was removed from the home. For example, if a child is removed from the CalWORKs home after the first of the month and placed in Foster Care, aid for the child would be discontinued effective the end of the month without a 10-day notice. If there were no other children left in the home, then the entire CalWORKs grant would be discontinued effective the end of the month without a 10 day notice.

5. **The FS HH cycle is October/November/December. The QR 7 for the HH is due in December and will be used for January/February/March. The HH reports on the QR 7 that they obtained a part-time job in December and will get \$900 in January and \$800 in February. If the HH reports mid-quarter (in February) that the \$800 was received for February and they anticipate no income for March, what action will the agency take for the remainder of the quarter (February and March)?**

Answer: Because there is no change from what was reported initially on the QR 7, the above mid-quarter change will have no impact on the income averaged from the December QR 7. The CWD will not compute a new monthly average using the newly reported income for the remaining months in the quarter, because the HH had only anticipated two months of income when the income was initially reported on the QR 7.

Note: CWDs must confirm whether income or decreased income being reported has not already been reported and used in a budget computation.

6. **Are rent and utility changes considered one change or are they treated separately. Scenario: The QR period is January/February/March. Shelter costs being budgeted are: \$200 rent and \$206 full SUA. The HH reports moving in February and the new rent amount is \$400 with all utilities included, no SUA. The HH reports and provides verification of the February changes in February.**

Answer: Shelter cost changes are considered one change that includes both rent and utility costs. In the above example, shelter costs actually decreased from \$406/ month to \$400/month. Therefore, the CWD should determine if the new shelter amount would result in increased benefits for February, March and ongoing. Once the shelter change amount is determined, it remains in place until the HH reports a new shelter (rent and utility) amount.

7. **A HH becomes homeless and must therefore change its reporting status from QR to change reporting for food stamps. Subsequently, (five months later), they find housing and should no longer be a change-reporting HH. The HH reporting cycle is January/February/March. Rent is budgeted at \$500/month with full SUA. Income is CalWORKs only. How would the CWD establish the quarter?**

Answer: If there is a companion CalWORKs case, the quarterly cycle should remain the same since there is an active CalWORKs case that already has an established QR cycle. When the HH reverts to QR status, the FS QR cycle should match the CalWORKs cycle. If there is no companion CalWORKs case, the CWD may establish the QR cycle by putting it back into the HH's previous cycle or by using the original application or recertification date.

8. **The HH consists of an SSI mother, one child, and one unborn. The reporting cycle is January/February/March. Shelter costs are \$600 for rent, \$300 rent deduction allowed due to SSI contribution and \$206 SUA. The newborn is reported born in January, and the Agency adds the newborn to the HH effective February (first of month following the month of reporting birth to agency). What will the rent deduction be for February/March? When will the rent deduction change to 2/3 instead of 1/2 of the \$600?**

Answer: The rent deduction for February will be \$400 (2/3 of \$600). The rent deduction changes to 2/3 instead of 1/2 when the newborn is added to the HH in February.

9. **When the actual or anticipated expenses are reported on the QR 7, the expenses will be averaged over the next QR payment quarter. If the expense is reported mid-quarter, the expense will be averaged over the current and remaining months in the current QR payment quarter. The QR cycle is January/February/March. The FS HH is one adult, and a minor child, over age 2. The FS HH has no child care expense at the beginning of the quarter. In February, the HH voluntarily reports that they anticipate**

childcare expenses in March in the amount of \$250. What will the agency allow as dependent care deductions for February and March?

Answer: Although the report was received in February, the change doesn't occur until March, so no action can be effective until March. Since March is the last month of the quarter, no averaging is necessary; the verified expense is used to determine benefits for March.

If instead, the recipient had reported in January that February child care would be \$250 and March would be \$500, then the change occurs in February. The February and March child care expenses can be averaged and the average used to determine benefits for February and March. January benefits are unchanged.

10. **If you change a CalWORKs grant due to a mid-quarter report and issue a supplement, what CalWORKs grant amount should the CWD use to refigure the FS budget to see if a supplement is due in for FS? Should the CWD use the existing grant amount plus the supplement, or leave the grant amount previously used in the FS budget and just change the reported info?**

Answer: The CWD must use the new CalWORKs grant when refiguring the FS benefits, which includes the previous grant amount plus the supplement.

11. **If an anonymous report provides information that a recipient could have voluntarily reported but didn't, what action must the CWD take prior to the QR 7?**

Answer: If the anonymous tip is about information that is not required to be reported, the CWD should note the information and wait for the next QR 7. If the information is not reported on the next QR 7, the CWD should act to resolve any inconsistency.

12. **A. What action can we take mid-quarter when the AU/HH makes a voluntary mid-quarter report of a new HH member and fails to provide necessary verification to add the new person if the CWD is unable to determine if the addition would result in an increase or not?**

B. When should the CWD take action to discontinue the AU/HH for failing to provide verification?

Answer:

A: The CWD would not be able to take any mid-quarter action on an existing case based on an unverified report of a new AU/HH member in the home. If the AU/HH requests to add a new person, and they do not provide required verification to establish eligibility for that person by the established deadline, the CWD would send a No Change NOA to the AU/HH indicating that their benefits will not increase. This would equate to denying the request to add the new person.

B. The CWD must wait until the end of the quarter in which the new HH member is required to be reported on the QR 7. The action must be based on information reported on the QR 7 for that quarter. If the AU/HH does not report the new member on the QR 7, the CWD must act to resolve the discrepancy and the AU/HH must provide verification on the same timelines that are required if the new member was reported on the QR 7.

13. **Can you take mid-quarter action to discontinue the case when an 18-year old Cal-Learn Pregnant Woman Only graduates from high school and is not in her third trimester?**

Answer:

No. Under QR/PB, benefits are “frozen” for the three months of the quarter and may only be decreased or discontinued during the quarter under the limited circumstances specified in ACL 03-18. In this scenario, the teen (as a PWO) is aided as an adult, not as an eligible child. Therefore, the “child reaches age limit” provision listed in ACL 03-18 does not apply, and the county cannot take action to discontinue this PWO case mid-quarter.

Additionally, to be a participant of Cal-Learn, the teen cannot have obtained a high school diploma. Therefore, in this scenario, the PWO will no longer be eligible to participate in the Cal-Learn Program and would no longer qualify for CalWORKs aid in the first two trimesters under MPP 42-762.7. She would be discontinued from CalWORKs at the end of the quarter unless she has reached her last trimester or has given birth.

However, the teen is entitled to a \$500 bonus for Cal-Learn graduation (MPP 42-766.8). When a Cal-Learn teen earns a bonus, the CWD shall act at the end of the month in which timely and adequate notice can be provided and this is considered a county-initiated mid-quarter action based on the policy on page 58 of ACL 03-18.

14. **Why does the QR 377.4 still contain suspension language?**

Answer: The language remained on the form pending the outcome of a suspense issue with the Food and Nutrition Service regarding suspension of an individual during the quarter. Since it was determined that suspensions will not occur mid-quarter, the suspense language will be removed from the form.

15. **Will other Cash programs such as RCA, Homeless Assistance, Immediate Need, and Foster Care etc. be budgeted similar to CalWORKs after implementation of QR/PB?**

Example: Will FC or RCA cases now use the average income for the future quarter? Or should we assume that no other cash program except CalWORKs will be modified for budgeting purposes?

Answer:

- RCA will follow CalWORKs budgeting rules under QR/PB and will average income for the future quarter.
- Foster Care will not be implementing QR/PB, and will therefore not be budgeting for aid payments like CalWORKs aid payments.
- Homeless Assistance is a special needs calculation made after the CalWORKs budgeting is completed.
- Immediate Need (IN) payments are considered advance payments of the grant amount to which the AU is entitled to receive. Income will be averaged in order to determine the eligible grant amount for the month in which IN is requested.

16. **The ACL states “For FS Quality Control (QC) purposes, reviewers will rely heavily on case documentation when reviewing case files to determine if benefits have been issued in the correct amounts.” What is the minimum information that needs to be stored for QC purposes?**

Example: Dad enters home mid-quarter and starts working part-time. Dad’s inclusion mid-quarter decreases the AU’s benefits and the worker rejects the decreased grant amount due to mid-quarter QR/PB regulations. Does the system need to store the entire budget with the Dad’s resource and non-financial details for QC purposes, or can a mini-budget be stored with only the minimum data elements, which would be required later by the auditing department?

Answer: Case documentation must include sufficient information for a QC worker to be able to determine what action an EW took and why. At a minimum, the case files should be annotated with the following information:

- When the changes occurred and in what sequence;
- When the changes were reported;
- What income was used in the budget and why; and
- What action the EW took and why.

CDSS will not dictate what automation systems should store in terms of budget information; however, the case must reflect the information indicated in the bullets above so that it can be used for QC reviews and for comparison with the next QR 7 submitted.

17. **The quarter is January/February/March. On the QR 7 submitted in March, the client reports that her 17-year old son returned to the home. The QR 7 is received timely on March 10. The worker begins the process to complete the add-person application on March 15. The client is allowed 10 days (until March 25) to provide needed information to complete the add-person application. However, verifications needed to complete the add-person application are not received until April 3rd. When and how should the new quarter be set up?**

Answer: No new quarters would need to be established in this situation, because there should be no interruption in the original QR cycle. The CWD could not

have discontinued the case effective March 31 with timely notice, because the March 25 deadline was too late in the month. However, once the HH failed to submit verification for the 17-year old son by March 25, the CWD would be required to send discontinuance NOA to the HH effective April 30. When the verification is received on April 3, the CWD would determine if the HH would remain eligible and if so, rescind the discontinuance for the existing HH. If eligible, the son can be added May 1. Whenever verification is received outside of the 10-day timeframe, the new HH member is not allowed to keep the earlier report date as an effective date. The receipt of verification after a deadline establishes a new report date for the new HH member. The new request date in this case will be April, and the soonest that the son could be added to the HH would be May 1.

18. **If an allowable expense (shelter, dependent care or medical expenses) cannot be verified within 30 days of the January 2 application so the case is approved without the expense, but the household provides verification in February of the deduction, when should the expense be allowed for QR/PB?**

Answer: The application will be approved effective January 2, but no expense will be allowed due to lack of verification. When verification is received in February, the expense, if incurred, can be allowed for February and March, (the remainder of the quarter). NOTE: This applies to counties that have opted to verify shelter costs.

19. **A: Based on the scenario given below, when benefits are re-evaluated by the CWD on December 10 based on the new information reported on December 8, will the December 8 report be considered as a mid-quarter report since *property eligibility is only determined once per quarter*, or will the December 8 report be considered as a timely addendum to the QR7?**

B: When exactly does the “mid-quarter” start?

AU consists of Mom and her child, Mom is working part-time, QR Payment Quarter is January/February/March; QR 7 was submitted timely on December 3, and benefits were evaluated by the CWD on December 5 for the January/February/March quarter. Based on information on the QR 7, the AU is considered property eligible. On December 8, the AU reports that a retirement account available in November (QR Data Month) was erroneously excluded in the QR 7 submitted on December 3rd.

Answer:

A: The new information regarding the retirement account in this example is not considered a mid-quarter report, because it is not a situation that had changed subsequent to the QR Data Month (February). The AU/HH is providing a correction to the QR 7 that was submitted, and the CWD should act on this information as part of the QR 7 report process. In this case, if the AU/HH is

ineligible based on excess resources, the CWD must discontinue the case effective December 31.

B: With regard to reporting, the term mid-quarter means any change reported during the QR payment quarter outside of the QR 7 report process.

20. **Using the scenario below:**

A: Will the boyfriend's fleeing felon status be applied to the FS HH mid-quarter as well as causing a reduction in benefits? Per ACL 03-18, fleeing felon status is not a mandatory reporting requirement for the boyfriend in the CW/FS linked case #1 since he is only applying for FS in this case.

B: On a generic note, for linked cases, is the CWD required to synchronize the QR Payment Quarters for both linked cases or can a timely QR 7 report in linked case #1 be treated as a mid-quarter report in linked case #2?

Linked Case #1: CW/FS/MC case. The FS HH consists of Mom, Mom's boyfriend, Mom's own child (Kid 1) and boyfriend's own child (Kid 2). Mom and Kid 1 apply for CW/MC.

Linked Case #2: Mom's boyfriend and Kid 2 apply separately for CW on a different case. Both CW cases are approved.

The QR Payment Quarter for FS and both CW cases is January/February/March. Boyfriend becomes fleeing felon on January 15 and is discontinued from CW in linked Case #2 effective January 31, since fleeing felon is a mandatory reporting requirement for CW.

Answer:

A: In Case #1, the boyfriend is not receiving CalWORKs benefits. Therefore, he has no requirement to report his fleeing felon status and the FS case would not be affected. In Case #2, however, where the boyfriend is also receiving CalWORKs benefits (for himself and his own child), he would be required to report his fleeing felon status and when he does make that mandatory mid-quarter report, the worker would take appropriate action on the linked PAFS case (i.e., discontinue boyfriend effective January 31.)

B: The CWD should make every effort to align the CalWORKs quarterly cycle with the established FS quarterly cycle. This may require a county's automation system to override the established methodology for determining quarters based on application date and/or terminal digits. CWDs cannot require a FS HH to report the same changes twice in one quarter. Also, the FS certification period is linked to the QR cycle, where the last month of the 4th quarter is the month in which certification must occur. The certification period in the FSP can only be shortened for ineligibility or questionable eligibility. Therefore, the FSP is locked into the established QR cycle and FS certification period.

21. **If a household makes a voluntary report of an increase in shelter costs that would increase benefits, but reports it in the month following the actual change, would a supplement be issued for the month the change occurred or in the month the change was reported?**

Answer: If the recipient reports a shelter cost change in the month following the actual change, but within 10 days of the change and providing the cost was incurred in the prior month, the case can be supplemented.

22. **Should a No Change NOA be sent when it is not a budget recalculation (Deprivation or Property change)? Example: Recipient voluntarily reports a change in property that makes them ineligible. Is the CWD required to send the recipient a No Change NOA in mid-quarter, and then wait until the next QR 7 is received to determine if customer remains over property?**

Answer: Yes, the CWD must send a No Change NOA if the AU/HH has voluntarily reported new resources/property or deprivation changes in mid-quarter. The No Change NOA includes language that reminds the recipient to report this information on the next QR 7 that is submitted.

23. **Will the Redetermination or Recertification forms be used in place of the QR 7 for the fourth quarter? This procedure has successfully worked in other programs and would assist the customer by reducing the paper work required.**

Answer: CDSS will not mandate that CWDs use the Redetermination/Recertification (RD/RC) forms in place of the QR 7 for the fourth quarter. However, CWDs may use the RD/RC forms in place of the QR 7 if they are able to do the following:

- Obtain all necessary information to determine the next quarter's benefit amount and continuing AU/HH eligibility. (This will require that CWDs obtain income/expense information for the next three months.)
- Schedule the RD/RC early enough in the month to be able to establish the next quarter's benefits, keeping the 10-day noticing requirements in mind for possible adverse actions.

24. **Can the QR 7 be used in place of a CA 8 or SAWS 2, as a CalWORKs application, to add a person or change deprivation?**

Answer: Yes. A CA 8 is not required when all information necessary to determine eligibility is available on the QR 7 or other available documentation in the case. If additional information is needed beyond what is available, the CWD should obtain the appropriate Statement of Facts in accordance with MPP 40-119.3 and .4. PAFS cases would defer to the process used in the CalWORKs program.

25. **Are CAPI recipients required to report and verify their benefits on the QR 7?**

Answer: CAPI has always followed federal SSI rules for reporting changes when they occur. QR does not affect CAPI. However, if other family members are receiving CalWORKs and/or Food Stamps, QR 7 requirements apply to family and household changes.

26. **Are all sanctions listed under MPP Section 82.832.2 (verification of citizenship or alienage, SSN verification, etc.) considered county-initiated actions? Does this include time-limited sanctions as well?**

Answer: Yes, the sanctioned persons listed under MPP Section 82-832.2 must be discontinued mid-quarter. These are county-initiated actions. Sanctions that are of a specified duration (WTW sanctions) may start and end in the middle of a quarter. The following sanctions and penalties shall be initiated mid-quarter:

- WTW sanction;
- Child Support failure to assign support rights sanction;
- Sanction for failure to cooperate in verifying citizenship/alienage status;
- Sanction for refusal/failure to furnish an SSN, provide proof of completed application for SSN, furnish SSN;
- Sanction for strikers who are not caretaker relatives;
- Cal-Learn sanction;
- Penalty for failure to comply with immunization requirements;
- Penalty for failure to comply with school attendance requirements;
- 25% penalty for failure to cooperate with child support; and
- Penalty for Intentional Program Violation.

FSP Note: Mid-quarter action can also be taken for FS sanctions.

27. **At initial intake, we use two CW 7s to obtain a reasonable picture of the client's situation for the first two months for prospective budgeting. With a QR 7, at the initial intake, what method will we use to prospectively budget for the upcoming quarter?**

Answer: There are no regulations that currently require CWDs to obtain two CW 7s in order to prospectively determine eligibility for the first two months of aid. Regulations require that CWDs prospectively estimate income for the first two months of aid to determine the benefit amount. The CW 7 is simply the vehicle currently used by counties to document the estimate.

The QR 7 has information necessary to prospectively budget the quarter. The SAWS 2 has current month information. The only remaining question is whether the recipient anticipates changes in income/expenses in the last two months. This can be documented in the file without using a QR 7.

Under QR/PB, counties must document the estimate of reasonably anticipated income and expenses for the initial quarter somewhere in the case file. How or

where the county chooses to document the case file is up to county discretion. However, CWDs must ensure that case narrative entries provide sufficient information for a case reviewer (fraud investigator or Quality Control reviewer) to be able to understand how the worker determined eligibility and benefit levels for that time period.

28. **A recipient voluntarily reports a mid-quarter decrease in income, and we give the family 10 days to provide verification of the change.**
A. Can we narrate this in the case record or do we need to send a letter requesting verification?
B. If a change was reported 3/20, verification provided 4/5, do we go back to March to increase benefits?
C. Will the client be allowed the verification and timely notice timeframes to provide verification?

Answer:

- A. The CWD must request verification in writing.
B. If the recipient timely provides verification (within 10 days of the request), even if the verification is provided in the following month, then the change relates back to March 1. If the recipient fails to provide timely verification, the CWD must send a "No Change NOA" to the AU/HH. If the AU/HH provides verification after the 10-day period, the date the verification is provided should be considered the date of a new voluntary report. The CWD would supplement for the current month and any remaining months of the quarter in which the change was reported.
C. The FSP's verification and timely notice timeframes (10/10/10) do not apply to voluntary change reports, only to mandatory reports.

29. **When should the CWD discontinue or decrease benefits when someone fails to provide information required to determine eligibility or fails to meet an eligibility condition (e.g. apply for unconditionally available income) - mid-quarter or at the end of the quarter?**

Answer: If the failure to meet eligibility conditions occurs within the quarter and is not part of the current QR 7 reporting requirement, the CWD shall discontinue the recipient the end of the quarter. However, as noted in the response to question #26 above, if a recipient fails to provide information required for school attendance, immunization, child support cooperation, WTW and FSET cooperation, or cooperation with Cal-Learn, the CWD shall take mid-quarter action to implement a sanction or penalty as appropriate.

30. **Will the FSP now require a personal/Balderas contact prior to the end of the month for non-receipt of QR 7?**

Answer: The Balderas reminder contact is not required for NAFS cases.

31. **In example 1 on page 17 of ACL 03-18, if the client received the car in March, why would the client remember to report it on the May QR 7 report since he did not get the car in May 2002?**

Answer: The QR 7 asks recipients to report all new property/resources that the AU/HH received since the last QR 7. The recipient is required to report having received a new car during March on his/her May QR 7. This is an informing and recipient education issue, and CWDs should be explaining the reporting requirements to recipients so that they will understand what their reporting responsibilities are.

If the recipient had voluntarily reported the new car mid-quarter, the CWD should have noted it in the case file. When the QR 7 does not report the new car, the CWD should contact the recipient to resolve the inconsistency. A No Change NOA must be sent with a reminder to the recipient to report the change on the next QR 7.

32. **Is the multiplier/conversion factor used when determining financial eligibility? Example: A HH of 1 receives UIB of \$230 per week and is paid bi-weekly. $\$230 \times 2 \times 2.167 = \996.82 or $\$230 \times 4.33 = \995.90 . The FSP gross income limit for a family of 1 is \$960. Using the multiplier would make this client ineligible. Which method should be used?**

Answer: For new CalWORKs applicants, the CWD should use the actual income that is reasonably anticipated for the application month to determine financial eligibility. Once eligibility is established, the CWD would determine the monthly average income using the bi-weekly conversion factor of 2.167.

For FS cases, the CWD would be required to determine the average monthly income and use that in determining if the HH passes the gross income test. Determining the average monthly income will require using the bi-weekly conversion factor of 2.167 for stable income.

33. **Under QR/PB, will recipients still be allowed to waive the 10-day notice requirement for adverse actions? ACL 03-18 does not mention whether a waiver to the 10-day timely notice would be allowed under QR/PB (as is currently allowed).**

Answer: Under QR/PB, the CalWORKs program will continue to allow recipients to have an opportunity to waive the 10-day notice requirement in order to avoid incurring an overpayment in their case. Waiver of the 10-day notice provision will allow the CWD to decrease or discontinue benefits without having to provide a timely (10-day) notice to the AU.

There is no provision in the FS regulations to allow the HH to waive their right to a timely NOA.

34. **Does the client need to report a decrease in shelter costs on the QR 7 even when he or she has not moved? If the decrease was reported voluntarily during the quarter, is the QR 7 incomplete if the recipient fails to report it again on the next QR 7?**

Answer: No to both questions. The client is only required to report shelter cost changes at recertification or when the HH moves. The QR 7 would not be considered incomplete if the recipient fails to report on the next QR 7.

35. **If at Intake or on the QR 7, the client reports and verifies that their shelter costs will change from \$500 to \$600 effective the second month of the quarter, will we average the expenses for the quarter? Pages 24, 30 and 48 of the ACL appear to contradict one another.**

Answer: No. Once the report is verified, the shelter cost change would be made in the month of the increased costs and remain at the new level until a new shelter cost is reported. Examples: (1) The quarter is January/February/March. On January 10th the recipient reports and verifies that rent will increase to \$600 in February. Benefits for February shall be increased. The \$600 dollar expense is ongoing until a new change is reported; (2) On February 20th, the recipient reported and verified their increased rent of \$600. The CWD would supplement the month of February to increase benefits and the \$600 expense remains in place until a new change is reported.

36. **The CW 72 – Sponsor's Monthly Income Report needs to be changed for Quarterly Reporting**

The CW 23 – Senior Parent Statement of Facts has a line in the Certification section that states they must report any changes within 5 days. The Certification section should be reviewed and changed.

Answer: CDSS has modified the CW 72 to accommodate quarterly reporting and will issue the new form under separate cover as the QR 72.

CDSS will review the CW 23 and make necessary adjustments to incorporate QR/PB rules.

37. **How are multiple changes that are reported at one time handled? For example, a baby is born in month 1. The fully-employed absent father moves into the home in month 2. The birth of the baby and the father moving in are reported in month 2.**

Should the county grant aid to the baby to the end of the quarter or determine that ineligibility occurred after the beginning date of aid, but before granting action could be taken, and deny aid to the baby?

Answer: When multiple changes are reported at the same time, they are considered separately and in the order that they occurred. In this example, the baby's eligibility must be considered first. All circumstances relative to the baby's eligibility must be considered before the baby can be added. Here, the report is the first application for the baby, and all eligibility factors need to be evaluated. If ineligibility occurs any time before action is taken to grant aid, the application must be denied. In this situation, the application must be denied in accordance with MPP 40-171.221(g) because the baby has no deprivation, since the father is in the home and employed full-time.