



CDSS

WILL LIGHTBOURNE
DIRECTOR

STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES

744 P Street • Sacramento, CA 95814 • www.cdss.ca.gov



EDMUND G. BROWN JR.
GOVERNOR

February 27, 2014

ALL COUNTY LETTER 14-20

REASON FOR THIS TRANSMITTAL

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

TO: ALL COUNTY WELFARE DIRECTORS
ALL CALFRESH PROGRAM SPECIALISTS
ALL CALWORKs SPECIALISTS
ALL CONSORTIUM PROJECT MANAGERS
ALL QUALITY CONTROL COORDINATORS

SUBJECT: CALFRESH WAIVER TO WAIVE INTERVIEW
SCHEDULING REQUIREMENTS

REFERENCE: ALL COUNTY LETTERS 13-61 AND 13-57, FNS WAIVER #2130007, TITLE 7 CODE OF FEDERAL REGULATIONS PARTS 273.2(e) (3), 273(h) (1) (i)(D), and 273.14(b)(2); MANUAL OF POLICIES AND PROCEDURES SECTIONS 63-300.46, 63-300.464, AND 63-301.5; AND CALFRESH RECERTIFICATION APPOINTMENT LETTER (CF 29)

United States Department of Agriculture (USDA), Food and Nutrition Service (FNS), approved a waiver of the CalFresh interview scheduling requirements to permit “on-demand” telephone interviews at initial application and recertification. The purpose of this All County Letter (ACL) is to provide County Welfare Departments (CWDs) the choice to implement on-demand interviews with instructions for how to waive interview scheduling requirements at 7 CFR 273.2(e) (3) and 7 CFR 273.14(b) (2) and Manual of Policies and Procedures (MPP) Sections 63-300.46 and 63-300.464.

FNS has approved this waiver for a period of two years from the date of implementation. It is a county option to implement the waiver. However, if implemented, it must be implemented county-wide. For CWDs opting into this waiver, the on-demand waiver requirements will be the default method for scheduling interviews unless the applicant requests a face-to-face interview scheduled at a specific date and time, or the CWD determines the household is entitled to Expedited Service (ES) when the application is screened for ES.

Whether under the current regulatory requirements [7 CFR 273.2(e)(3) and MPP Section 63-300.46] or the waiver, CWDs have the option of allowing households to complete a telephone interview without a scheduled appointment by calling the CWD or the CWD call center. CWDs must continue to schedule appointments or provide an on-demand interview window that allows for the interview to be completed promptly enough allowing the applicants the opportunity to participate in an interview within 30 days of initial application, including scheduling appointments which accommodate the needs of those with special circumstances, especially working households.

CWDs are required to send on-demand appointment letters to households at both initial intake and recertification and for non-waiver recertification interviews, reminding the household in writing of their scheduled interview which provides a telephone number to call or be called for an interview during the CWD's normal business hours. After following Notice of Missed Interview (NOMI) procedures households will be sent a denial notice for (a) failing to complete the initial interview within 30 days of when the application was filed or (b) failing to complete recertification after submitting the application and before their certification period expires. Per existing recertification policy, if the household never submits a recertification application a denial notice is not required after sending the NOMI.

CWDs who opt not to implement this waiver and choose not to provide the newly developed recommended appointment letter (CF 29A) with the household's scheduled interview at initial application, must clearly document in the case file the specific date and time of the scheduled interview and how the household was informed of their interview appointment.

Scheduling the On-Demand Interview

CWDs that have opted to implement this waiver and are unable to interview the household on the day the application is submitted, must schedule an interview as provided under 7 CFR 273.2(e)(3) for households entitled to ES, or use the following alternative process for all other households:

Initial Application

The CWDs must send the household an on-demand appointment letter (CF 29B). The CWD shall give the household a two week (ten business days) window, for the household to call the CWD for a telephone on-demand interview. If the household fails to complete the interview within the two week (ten business day) window, the CWD shall follow the NOMI procedures in accordance with MPP Section 63-300.46. CWDs

are reminded that the household must complete an interview within 30 days from the date the application is filed before the CWD can determine eligibility and issue benefits.

Recertification

All households will receive a Notice of Expiration of Certification (NEC) before the first day of the last month of the recertification but not before the first day of the second to the last month of the certification period.

CWDs will schedule the required interview by sending households an appointment letter (CF 29D) informing them that they must have an interview for the CWD to determine ongoing eligibility. CWDs shall give the household a two week (ten business days) window for the household to call the CWD for a telephone interview. The household must complete the interview prior to the end of the current certification period expires or be denied continuing CalFresh benefits. If the household fails to complete the interview within the two week (ten business day) window, the CWD must follow the NOMI procedures in accordance with MPP Section 63-300.464.

Initial Application and Recertification

Each CWD that opts to implement the waiver must ensure that (1) the necessary phone system can collect the required data to send to FNS and to support client high call volumes and (2) that a recorded message to inform clients when lines are busy and the expected wait time is in place prior to implementing on-demand interviews. CWDs must provide a scheduled appointment for a phone interview and/or a face-to-face interview for any household that requests one.

Expedited Service

Households screened as entitled to expedited service (ES) will not be processed under this waiver. CWDs are to screen all applications for ES and process them in accordance with current procedures. Nothing in this waiver approval absolves CWDs from meeting the ES processing standards at MPP Section 63-301.5 that require benefits to be made available to eligible households by the third calendar day following the date the application is filed. For households entitled to ES who may not be available to interview on the same day the application is filed, CWDs must schedule an interview with a specific date and time to complete the application process. If the household fails to complete the ES scheduled interview, the CWD must follow the NOMI procedures provided in MPP Section 63-300.46.

Data Reporting and Claiming

Before an extension can be granted by FNS for this waiver, CWDs will be required to report on the first 12 months of operation under this waiver which will be due no later than 15 months after implementation of this waiver. The required report form will be issued under separate cover.

In anticipation of the report counties must collect the following data elements:

- The number of applications filed;
- The number of applicants interviewed the first day;
- The number and percentage of expedited service applications processed timely (within seven days);
- The number and percentage of non-expedited service applications processed timely (within 30 days);
- The number and percentage of NOMIs sent for failure to complete the application and recertification interview;
- The number and percent of cases denied for failing to complete the interview by the 30th day;
- Data on average wait time to be interviewed, the number of dropped calls for all callers phoning CWD for their interview, and call completion times for interviews of non-expedited cases; and
- Any other issues associated with this waiver, including the number of client complaints (verbal or written) about any difficulty in reaching CWD staff in order to be interviewed by telephone, the number of request for a face-to-face interview, and any issues related to this waiver.

Quality Control

FNS has transmitted new quality control (QC) language in conjunction with “on-demand” waivers. This language does not represent new or modified QC procedures but only serves as a means for clarifying current QC procedures as it pertains to this particular waiver:

QC must review in accordance with current QC procedures as outlined in the FNS-310, Quality Control Review Handbook, Chapter 13. Since the procedure requires verification of the notice of interview, QC must verify that (1) households were given an appointment letter defining the on-demand interview instructions as stated within the waiver and (2) a NOMI was sent for failure to complete an interview within the on-demand window given by the CWD.

- Verification of the letter being provided includes, but is not limited to, (1) a copy of the letter within the case file, (2) a printout by the CWD's system indicating the letter was provided, or (3) a notation in the case file by the eligibility worker indicating the letter was provided or mailed to the household. If the record contains such documentation, the action to deny/terminate the household for failure to be interviewed will be considered valid.
- If there is no documentation verifying (a) the household was given a letter with the on-demand interview scheduling instructions, (b) the household missed the interview deadline, and (c) was sent a NOMI but never followed up to complete an interview, the resulting denial/termination action will be considered invalid since there was no record the household had been provided the on-demand interview scheduling instructions.

Forms

Enclosed are revised or new forms that have been developed to be used for the following:

- CF 29A (2/14)** **CalFresh Initial Appointment Letter (Recommended Form)**
This form is the newly developed CalFresh Initial Appointment Letter CF 29A (2/14). The purpose of this appointment letter is for the CWD to notify the household in writing of their scheduled initial intake appointment for CalFresh. This letter is recommended to be used by CWDs when scheduling the initial intake interview for households applying for CalFresh.
- CF 29B (2/14)** **CalFresh Initial On-Demand Appointment Letter (Required Form, Substitute Permitted)**
This form is the newly developed CalFresh Initial On-Demand Appointment Letter CF 29B (2/14). The purpose of this letter is for the CWDs who opt to waive initial interview scheduling requirements to notify the household that they have a two week window period (ten business days) to contact the CWD and conduct their initial on-demand interview. This letter informs the household that they need to complete their interview within the 30 days following the date the application was filed with the CWD.

CF 29C (2/14) CalFresh Recertification Appointment Letter (Required Form, Substitute Permitted)
This form replaces the current version of the CF 29 letter. The purpose of this appointment letter has not changed. This letter is a required form to notify a CalFresh household of their recertification scheduled interview appointment. This letter was updated by adding back the check box and text boxes where the contact information is provided by the CWD for a face-to-face interview.

CF 29D (2/14) CalFresh Recertification On-Demand Appointment Letter (Required Form, Substitute Permitted)
This form is the newly developed CalFresh Recertification On-Demand Appointment Letter CF 29D (2/14). The purpose of this letter is for CWDs who opt to waive the current recertification interview scheduling requirements to notify the CalFresh household that they have a two week window period (ten business days) to contact the CWD and conduct their recertification on-demand interview. This letter informs the CalFresh household that they need to complete their interview before their current certification period expires.

Camera-Ready Copies and Translations

For camera-ready copies of the English language version of the CF 29A, CF 29B, CF 29C, and CF 29D contact CDSS Forms Management Unit at fmudss@dss.ca.gov. If your office has internet access; you may obtain these forms from the CDSS web page at:

<http://www.cdss.ca.gov/cdssweb/PG183.htm>

When all translations are completed per MPP Section 21-115.2, they will be posted on an ongoing basis on our website. Copies of the translated forms and publications can be obtained at:

http://www.cdss.ca.gov/cdssweb/FormsandPu_274.htm

For questions on translated materials, please contact Language Services at (916) 651-8876.

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If you have any questions regarding the waiver indicated in this letter, please contact your CalFresh county consultant or call the CalFresh Branch at (916) 654-1896.

Sincerely,

“Original Document Signed By:”

TODD R. BLAND
Deputy Director
Welfare to Work Division

Enclosures



JUN 11, 1013

**United States
Department of
Agriculture**

**Food and
Nutrition
Service**

3101 Park
Center Drive

Alexandria, VA
22302-1500

Mr. Todd R. Bland
Deputy Director
Welfare to Work Division
Department of Social Services
744 P Street
Sacramento, CA 95814

RE: SNAP- California's Initial Waiver Request to Waive Interview Scheduling Requirements

Dear Mr. Bland:

This letter transmits the approval (2130007) of California's Department of Social Service's (DSS) initial request to waive interview scheduling requirements at 7 CFR 273.2(e)(3) and 7 CFR 273.14(b)(2). The waiver will allow the use of on-demand telephone interviews at initial application and recertification for the Supplemental Nutrition Assistance Program (SNAP).

Under this waiver, local offices would have the option of allowing households to complete a telephone interview without an appointment by calling a call center. Households can call anytime during specified business hours within 10 business days or two weeks from the date of the appointment letter. Households screened as eligible for expedited service will not be processed under this waiver.

If the household does not call within the specified timeframe, the State agency will send a Notice of Missed Interview (NOMI) explaining the need for them to complete the interview by the 30th day from the date of application or by the end of their certification period. DSS will provide a scheduled interview and/or face-to-face interview for any household that requests one.

Since SNAP in California is administered by the individual counties, the State will not operate or support one specific phone system. Therefore, California DSS will ensure that each county implementing on-demand interviews will have the necessary system to support clients and high call volumes, including a notice to clients when lines are busy.

The Food and Nutrition Service (FNS) is approving this waiver for a period of 2 years from the date of implementation. This waiver will be effective August 1, 2013, through July 31, 2015. If the actual implementation date differs from the current expected date, please advise the FNS Western Regional Office.

JT

Mr. Todd R. Bland
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If you have any questions or need any additional information regarding this waiver,
please contact Hope Rios at Hope.Rios@fns.usda.gov.



gelaM. Kline
Chief
Certification Policy Branch
Program Development Division

Enclosures

WAIVER RESPONSE

1. **Waiver serial number:** 2130007
2. **Type of request:** Initial
3. **Regulatory citation:** 7 CFR 273.2(e)(3) and 273.14(b)(3)
4. **State:** California
5. **Region:** Western
6. **Regulatory requirements:** Regulations at 7 CFR 273.2(e)(3) require State agencies to schedule interviews for clients who do not receive an interview on the date of application. State agencies are required promptly to schedule appointments to allow the clients the opportunity to participate, scheduling appointments to accommodate the needs of those with special circumstances, especially working households. The State agency must notify clients who miss their interview appointment that they are responsible for rescheduling it. If the household contacts the State agency within the 30-day application-processing period, the State agency must schedule a second interview.

If the county is unable to interview a household on the day the application is submitted, it may either schedule an interview as called for under 7 CFR 273.2(e)(3) or use the following alternative process:

7. **Description of alternative procedures:** California requests to waive the requirement for scheduling interviews with a specific date and time for households who are not interviewed on the date they submit their application and allow households the option to either schedule an interview as called for under 7 CFR 273.2(e)(3) or use the alternative process to schedule interviews. When households miss the scheduled interview, counties must send a NOMI and schedule a second interview upon request. California currently has a waiver that waives the face-to-face interview requirement and the documentation of a hardship and allows households the option for a telephone interview at initial application and at recertification.

California's Quality Control (QC) review process will continue to identify the last interview type as either face-to-face or by telephone. Households who request a face-to-face interview will be provided one.

Under the proposed waiver, in lieu of scheduling interviews for households, California will waive the specific date and time as called for under 7 CFR 273.2(e)(3) and provide an alternative process to allow the households to call at

their convenience for a telephone interview and allow a two week window, or ten business days to contact the county to schedule an interview. When households miss the scheduled interview, a NOMI will be sent and a second interview will be scheduled upon request. On-demand interviews will be available for both paper and online applications.

Alternative to 273.2(e)(J) - Scheduling the Interview

For Initial Application

The county office send the household a letter with the following information:

- The household must have an interview before the county can determine their eligibility for benefits;
- To call the county at [###-###-####] between {HH:MM and HH:MM} Monday through Friday by a specific date (two weeks from the filing date) to complete the interview.
- Households who do not complete an interview, by the date indicated in the letter will be sent a Notice of Missed Interview (NOMI) informing the household that it had missed the interview and to contact the county welfare department (CWD) to reschedule if they still wish to receive benefits.
- Households failing to complete the interview within thirty days of the date of the application was filed will receive a denial notice.

For Recertification

All households will receive a Notice of Expiration of Certification (NEC) before the first day of the last month of the recertification but not before the first day of the second to last month of the certification period.

The county will facilitate the required interview by using One of the following processes:

- 1) Conduct a face-to-face or phone interview at a specific time and date allowing households at least ten days after the interview in which to provide verification before the certification period expires. If a household misses a scheduled interview, the county will send a NOMI. Households that requested another interview will be rescheduled a second interview; or
- 2) Send households a letter informing them that they must have an interview for the county to determine ongoing eligibility for benefits and providing the following instructions for completing the interview:
 - The contact number for the required interview and the days and

times the household can call for an interview;

- The date by which the household must complete the interview (MM/DD/YY) (Two weeks before the end of the current certification period) or be denied recertification for benefits;
- Households who do not complete an interview within the two week timeframe indicated in the letter will be sent a NOMI informing the household that they missed their interview and that they must contact the C\VD to reschedule if they want continuing benefits;
- Household failing to complete the required interview before their certification period expires will be sent a denial notice for recertification of benefits.

8. Action and reason for approval or denial: FNS is approving California DSS's request for 2 years, effective August 1, 2013. FNS understands and agrees that the approval of this waiver will improve the efficiency of the eligibility process for both workers and clients, as well as potentially reduce payment and negative errors.

9. Regulatory or legislative basis for action: Approval is based on 7 CFR 272.3(c)(1)(ii), which allows FNS to approve waivers that would result in a more effective and efficient administration of the program.

10. Conditions and reasons: Approval is contingent upon the following conditions. DSS must:

- Inform clients that the State agency will schedule the interview or provide a face-to-face interview if one is requested;
- Screen all applications for expedited service and process expedited service applications in accordance with allowable procedures. Nothing in this waiver approval will absolve the State from meeting the expedited service processing standards in 7 CFR 273.2(i) that require benefits to be made available to eligible households by the 7th calendar day after their application;
- Provide households not eligible for expedited service, not completing the same day interview and/or not completing the interview the date by which the household should complete the interview requirement (calendar day);
- Provide a Notice of Missed Interview (NOMI) to households that do not complete their interview by the 10th calendar day from the date of a written notification they received by mail to call DSS for an interview;
- Repeat the instructions for completing the interview in the NOMI and inform clients of the date on which their application will be denied or benefits terminated if the interview is not completed;
- Ensure that recipient households that are sent a NOMI during

recertification and are subsequently denied have until the end of their certification period to complete the interview without having to submit a new application form;

- Ensure that sufficient administrative automation controls, are in place so the terms of this waiver are implemented efficiently. Phone system performance and staff adequacy must be monitored and adjusted to adequately serve incoming calls, with dropped calls, wait time and call completion time to be in conformance with industry standards;
- Provide the report required in item #11.

11. Information required for extension: If DSS wishes to extend the waiver beyond the 2.-year approval period, a report providing an analysis of the first 12 months of operation under this waiver will be due no later than 15 months after the implementation of the waiver. If the State does not wish to extend this waiver, DSS must submit a closeout report within 90 days of its expiration.

The report must include the following:

- The number of applications filed;
- The number of applicants interviewed the first day;
- The number and percentage of expedited service applications processed times (within 7 days);
- The number and percentage of non-expedited service applications processed timely (within 30 days);
- The number and percentage of NOMIs sent for failure to complete application or, recertification interview;
- The number and percent of cases denied for failing to complete the interview by the 30th day;
- Data on average wait time to be interviewed, the number of dropped calls for all callers phoning DSS for their interview, and call completion times for interviews of non-expedited cases; and
- Any other issues associated with this waiver, including the number of client complaints (verbal or written) about difficulty in reaching agency staff in order to be interviewed by telephone, the number of requests for a face-to-face interview, and any issues related to this waiver.

17., Expiration date: July 31, 2015

13. Limitation, if any, on regional office approval of like requests: Approval of this waiver is limited to the California Department of Social Services.

14. Quality control procedure: This new QC language is being submitted in conjunction with 'On Demand/ Unscheduled' Interviews. This language does not

represent new or modified QC procedures but only serves as a means for clarifying current QC procedures as it pertains to this particular waiver request.

QC must review in accordance with current QC procedures as outlined in the FNS-310, Quality Control Review Handbook, Chapter 13, and in addition must verify that households were given a letter defining the On Demand/ Unscheduled interview scheduling instructions as stated within the waiver, in addition to verifying a Notice of Missed Interview (NOMI) was sent for failure to complete an interview within the timeline given by the state.

Verification of the letter being provided includes, but is not limited to a copy of the letter within the case file, a printout by the state's system indicating the letter was provided, or a notation in the case file by the eligibility worker indicating the letter was provided or mailed to the household. If the record contains such documentation the action to deny/terminate the household for failure to be interviewed will be considered valid.

If there is no documentation verifying the household was given a letter with the On Demand/ Unscheduled interview scheduling instructions, the household missed the interview deadline, was sent a NOMI, but never followed up to complete an interview, the resulting denial/termination action will be considered invalid since there was no record the household had been provided the On Demand/ Unscheduled interview scheduling instructions.

15. Date of State agency request: November 28, 2012

16. Date of regional office's transmittal of request to national office:
December 14, 2012

17. Date of national office action, JUN 14 2011

18. Anticipated implementation date (*notify FNS if actual date differs*):
August 13, 2013

19. State agency contact (name, email/telephone): Mike Papin/
Mike.Papin@al.usda.gov / 916-654-1880

20. FNS regional contact (name, email/telephone): Hope Rios/
Hope.Rios@fns.usda.gov / 415-645-1932

CALFRESH INITIAL ON-DEMAND APPOINTMENT LETTER

•	•	Date	:
		Case Number	:
		Case Name	:
		Worker Name	:
		Worker Number	:
		Worker Telephone	:
•	•	Address	:

Your CalFresh application process must be completed by _____.
MM/DD/CCYY

You need an interview to complete the CalFresh application process. This is your appointment letter for an on-demand interview.

■ You have a CalFresh initial on-demand telephone interview. **If you prefer to be interviewed in person, please call the county at the number above for an appointment.**

To conduct the on-demand telephone interview, you must call the county between _____ and _____
DATE
 at: _____ between _____ and _____ Monday through Friday.
PHONE NUMBER TIME TIME

You must call the county during the county’s normal business hours (provided above), Monday through Friday to conduct your on-demand interview. County staff is available to take your call. If you do not complete your on-demand telephone interview within the two week window period (10 business days), you must call the county to reschedule or possibly complete a face-to-face interview.

■ You have a scheduled CalFresh face-to-face interview. To conduct the face-to-face interview, you must go to the County office at:

APPOINTMENT DATE:	APPOINTMENT TIME:
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COUNTY OFFICE NAME:

COUNTY OFFICE ADDRESS	CITY:	STATE:	ZIP CODE:
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IMPORTANT REMINDERS

- Failure to complete this interview may result in a delay of benefits or denial of your application for CalFresh benefits.
- If you do not complete your interview within the timeframe listed in this letter, it is your responsibility to reschedule it.
- To change your appointment, please contact the county.
- Required verification must be turned in within 10 days of the county asking for it.
- Please tell the county if you need help getting this information. The county can help you get it.
- If you fail to complete your interview within 30 days from your application’s filing date, you will receive a denial notice and you will need to reapply.

COMMENTS:

CALFRESH RECERTIFICATION ON-DEMAND APPOINTMENT LETTER

•	•	Date :
		Case Number :
		Case Name :
		Worker Name :
		Worker Number :
		Worker Telephone :
•	•	Address :

You were notified that your CalFresh certification period ends on _____ . You need an interview to keep getting CalFresh benefits. This is your appointment letter for an on-demand interview.

MM/DD/CCYY

■ You have a CalFresh recertification on-demand telephone interview. **If you prefer to be interviewed in person, please call the county at the number above for an appointment.**

To conduct the on-demand telephone interview, you must call the county between _____ and _____ at: _____ between _____ and _____ Monday through Friday.

DATE

DATE

PHONE NUMBER

TIME

TIME

You must call the county during the county’s normal business hours (provided above), Monday through Friday to conduct your on-demand interview. County staff is available to take your call. If you do not complete your on-demand telephone interview within the two week window period (10 business days), you must call the county to reschedule or possibly complete a face-to-face interview.

■ You have a scheduled CalFresh face-to-face interview. To conduct the face-to-face interview, you must go to the County office at:

APPOINTMENT DATE:	APPOINTMENT TIME:		
COUNTY OFFICE NAME:			
COUNTY OFFICE ADDRESS	CITY:	STATE:	ZIP CODE:

IMPORTANT REMINDERS

- Failure to complete the interview may result in a delay or may end your CalFresh benefits.
- If you do not complete your interview within the timeframe listed in this letter, it is your responsibility to reschedule it.
- To change your appointment, please contact the county.
- Required verification must be turned in within 10 days of the county asking for it.
- Please tell the county if you need help getting this information. The county can help you get it.

COMMENTS: