

# ELIMINATION OF CHANGE REPORTING IN CALFRESH

Amber Bonilla, CDSS CalFresh Policy

David Badal, Placer County

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# OUTLINE

- Background
- Scope
- Rationale
- Client Communication
- Caseload Conversion
- Certification Periods
- SAR 7 Due Dates
- Good Cause
- Things to Consider
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- Next Steps



# BACKGROUND

- Change Reporters are households in which:
  - At least one member is a migrant/seasonal farmworker; or
  - All members are homeless; or
  - Reside on an Indian reservation; or
  - All adults are elderly or disabled and have no earned income



# BACKGROUND

- Change reporters are required to report certain changes in their circumstances within 10 days.
- These changes include, but are not limited to:
  - Changes in unearned income over \$50
  - Changes in earned income over \$100
  - Changes in source of income
  - Changes in household composition
  - Changes in residence and resulting changes in shelter costs

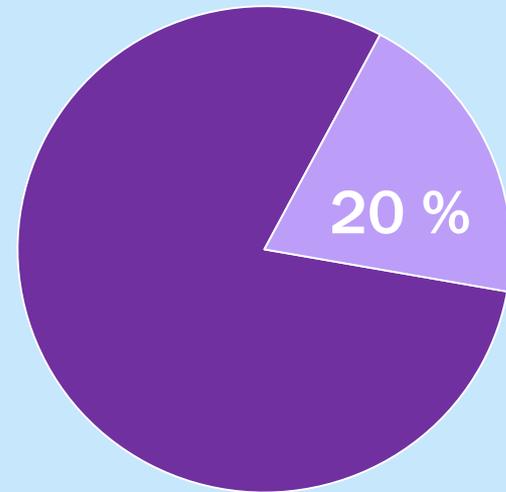


# BACKGROUND

- California transitioned from Quarterly Reporting (QR) to Semi-Annual Reporting (SAR) in 2013
  - Change reporting status was maintained for households excluded from QR
- Federal Regulations at 7 CFR 273.12(a)(5) give states the option to eliminate change reporting
- SB 79 (Chapter 20, Statutes of 2015) mandates CDSS to no longer require change reporting
- CA has chosen to eliminate change reporting effective no later than July 1, 2016.
  - [ACL 15-90](#)
  - [ACL 15-90E](#)

# SCOPE

- 2.1 million CalFresh households\*
- Approximately 20% of CalFresh households are change reporters



- SAR Households
- Change Reporting Households

# RATIONALE

- **Reduction in overissuances (OIs) for these households**
  - Approximately 25% of change reporters receive an OI at some point in the year
  - Subsequent reduction in error rate
- **Reduced frequency of reports that would not impact household eligibility under SAR**
- **Administrative standardization**

# CLIENT COMMUNICATION

## CF 500 – Informational Notice

STATE OF CALIFORNIA - HEALTH AND HUMAN SERVICES AGENCY

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

### INFORMATIONAL NOTICE TO CALFRESH RECIPIENTS IMPORTANT – PLEASE READ

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**This notice is for information only. There is nothing you need to do at this time.**

#### State Law Change for CalFresh Recipients

You are getting this form because you are a change reporting household.

Starting , you will no longer be a change reporting household. After ,

you will be a semi-annual reporting household. This is because of a change in state law.

#### What will this mean?

Starting , you will no longer have to report all changes to your worker within 10 days.

You will only be required to report when your income goes above a certain amount. The county will tell you this amount when the change happens.

Also, you will have to turn in a form called the SAR 7 Eligibility Status Report. We will send you this form when it is time to turn it in.

#### What do I need to do now?

Until , you will still have to report all changes to your worker within 10 days.

#### How will this change your benefits?

This will not change the amount of your benefits. Your benefits will still be calculated the same way.

#### Where can I get more information?

If you would like more information on this change you may call or visit your county office.

Per ACL 15-90 – the CWD's are required to send this notice at 6 and 3 months prior to implementation

# CASELOAD CONVERSION

- **CDSS, CWDs and SAWS Consortia have decided to implement this change no later than July 1, 2016.**
  - CalWIN counties will implement no later than June 1, 2016
  - C-IV and LEADER/LRS counties will implement no later than July 1, 2016
- **All cases, by consortia, will be converted at once**
  - SAR 7 deadlines set by the beginning date of aid (BDA)

# CERTIFICATION PERIODS

- Federal rules at 7 CFR 273.10(f) require that households be assigned the longest certification period possible based on the predictability of the HH's circumstances
- Certification periods:

Household	Certification Period	SAR 7 Due
Homeless/Migrant/Seasonal Farmworker	12 months*	6 <sup>th</sup> Month
Elderly/Disabled with earned income	24 months*	6 <sup>th</sup> , 12 <sup>th</sup> & 18 <sup>th</sup> month
Elderly/Disabled with no earned income	24 months*	12 <sup>th</sup> month
Households on Indian Reservations with earned income	24 months	6 <sup>th</sup> , 12 <sup>th</sup> & 18 <sup>th</sup> month
Households on Indian Reservations with no earned income	24 months	12 <sup>th</sup> month

\* Recommended

MPP 63-504.15; MPP 63-504.171

# SAR 7 DUE DATES

- SAR 7 sent based on beginning date of aid (BDA)
- [ACL 15-90E](#) provides corrected SAR 7 calendars
- No SAR 7s will be due in the month of conversion for cases transitioning from CR to SAR
- No change to current CR to SAR conversion procedures
- Let's look at some examples

# SAR 7 DUE DATES – CALWIN EXAMPLE 1

## CalWIN counties will convert cases June 1, 2016

- HH with a BDA of December 2015 – Cycle 6
  - Homeless household - 12 month certification
  
- Submit month is May 2016
  - This HH will still be change reporting at this time
  - They will not be required to submit a SAR 7
  
- Their first SAR 7 will be due May 2017
  
- Recertification will occur as normal in November 2016

# SAR 7 DUE DATES – CALWIN EXAMPLE 2

## CalWIN counties will convert cases June 1, 2016

- HH with a BDA of January 2016 – Cycle 1
  - Homeless household - 12 month certification
- Submit month is June 2016
  - Data month is May 2016 (they are still change reporting at this point)
- Their first SAR 7 will be due in June 2017
- Recertification will occur as normal in December 2016

# SAR 7 DUE DATES – CALWIN EXAMPLE 3

## CalWIN counties will convert cases June 1, 2016

- HH with a BDA of February 2016 – Cycle 2
  - Homeless household - 12 month certification
- Submit month is July 2016
- Data month is June 2016
  - At this point they will have been converted to SAR
- They will have their first SAR 7 due in July 2016
- Recertification will occur as normal in January 2017

# SAR 7 DUE DATES – CALWIN EXAMPLE

## Homeless/Migrant Seasonal Farmworker Households 12 Month Certification Periods

### CalWIN

Certification Month	Conversion Month	SAR 7 Data Month	SAR 7 Due 6 <sup>th</sup> Month	Recertification Month
August 2015	June 1, 2016	<b>December 2016</b>	<b>January 2017</b>	July 2016
September 2015	June 1, 2016	<b>January 2017</b>	<b>February 2017</b>	August 2016
October 2015	June 1, 2016	<b>February 2017</b>	<b>March 2017</b>	September 2016
November 2015	June 1, 2016	<b>March 2017</b>	<b>April 2017</b>	October 2016
December 2015	June 1, 2016	<b>April 2017</b>	<b>May 2017</b>	November 2016
January 2016	June 1, 2016	<b>May 2016*</b>	<b>June 2016*</b>	December 2016
February 2016	June 1, 2016	June 2016	July 2016	January 2017
March 2016	June 1, 2016	July 2016	August 2016	February 2017
April 2016	June 1, 2016	August 2016	September 2016	March 2017
May 2016	June 1, 2016	September 2016	October 2016	April 2017
June 2016	June 1, 2016	October 2016	November 2016	May 2017
July 2016	June 1, 2016	November 2016	December 2016	June 2017
August 2016	June 1, 2016	December 2016	January 2017	July 2017
September 2016	June 1, 2016	January 2017	February 2017	August 2017
October 2016	June 1, 2016	February 2017	March 2017	September 2017
November 2016	June 1, 2016	March 2017	April 2017	October 2017
December 2016	June 1, 2016	April 2017	May 2017	November 2017

\* Due to the timing of the conversion from CR to SAR, in the conversion month these households will not receive or be required to submit a SAR 7. The households will be subject to SAR reporting rules ongoing.

# SAR 7 DUE DATES – C-IV EXAMPLE 1

## C-IV counties will convert cases July 1, 2016

- HH with a BDA of January 2016 – Cycle 1
  - Homeless household - 12 month certification
  
- Submit month is June 2016
  - This HH will still be change reporting at this time
  - Will not be required to submit a SAR 7
  
- Their first SAR 7 will be due June 2017
  
- Recertification will occur as normal in December 2016

# SAR 7 DUE DATES – C-IV EXAMPLE 2

## C-IV counties will convert cases July 1, 2016

- HH with a BDA of February 2016 – Cycle 2
  - Homeless household - 12 month certification
- Submit month is July 2016
  - Data month is June 2016 (they are still change reporters at this point)
- Their first SAR 7 will be due in July 2017
- Recertification will occur as normal in January 2017

# SAR 7 DUE DATES – C-IV EXAMPLE 3

## C-IV counties will convert cases July 1, 2016

- HH with a BDA of March 2016 – Cycle 3
  - Homeless household - 12 month certification
  
- Submit month is August 2016
  
- Data month is July 2016
  - At this point they will have converted to SAR
  
- Their first SAR 7 will be due in August 2016
  
- Recertification will occur as normal in February 2017

# SAR 7 DUE DATES – C-IV EXAMPLE



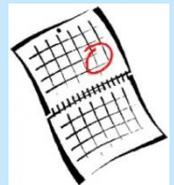
## C-IV/LEADER/LRS

Certification Month	Conversion Month	SAR 7 Data Month	SAR 7 Due 6 <sup>th</sup> Month	Recertification Month
August 2015	July 1, 2016	<b>December 2016</b>	<b>January 2017</b>	July 2016
September 2015	July 1, 2016	<b>January 2017</b>	<b>February 2017</b>	August 2016
October 2015	July 1, 2016	<b>February 2017</b>	<b>March 2017</b>	September 2016
November 2015	July 1, 2016	<b>March 2017</b>	<b>April 2017</b>	October 2016
December 2015	July 1, 2016	<b>April 2017</b>	<b>May 2017</b>	November 2016
January 2016	July 1, 2016	<b>May 2017</b>	<b>June 2017</b>	December 2016
February 2016	July 1, 2016	<b>June 2016*</b>	<b>July 2016*</b>	January 2017
March 2016	July 1, 2016	July 2016	August 2016	February 2017
April 2016	July 1, 2016	August 2016	September 2016	March 2017
May 2016	July 1, 2016	September 2016	October 2016	April 2017
June 2016	July 1, 2016	October 2016	November 2016	May 2017
July 2016	July 1, 2016	November 2016	December 2016	June 2017
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October 2016	July 1, 2016	February 2017	March 2017	September 2017
November 2016	July 1, 2016	March 2017	April 2017	October 2017
December 2016	July 1, 2016	April 2017	May 2017	November 2017

\* Due to the timing of the conversion from CR to SAR, in the conversion month these households will not receive or be required to submit a SAR 7. The households will be subject to SAR reporting rules ongoing.

# GOOD CAUSE

- Good cause allows for discontinuances due to non-submission of the SAR 7 to be rescinded when the client cannot be reasonably expected to fulfill his or her reporting responsibilities due to factors outside of their control
- When can good cause be established in a case?
  - Mental or physical condition that prevents client from submitting a timely report
  - Late report is attributable to a county error; or
  - Other extenuating circumstances
- CWDs should utilize the “extenuating circumstances” provision for the first 12 months subsequent to implementation for each affected household



# GOOD CAUSE GUIDELINES

The following apply when implementing good cause:

- Good cause may be granted if the household submits their SAR 7 after the extended filing date, but no later than the last day of the month following termination
- If a HH submits a late SAR 7 (after the extended filing date) after the 12 month transition period, the CWD must apply the Restoration of Aid rules as described in [ACL 12-25](#).
- If a HH submits their SAR 7 later than the last day of the month following termination the HH must file a new application if they wish to continue to receive benefits.
- Let's look at some examples

# GOOD CAUSE EXAMPLE 1

- A homeless household in a C-IV county converts from CR to SAR effective July 1, 2016
- The HH was initially certified in September 2015 and is due for recertification in August 2016
- The HH's first SAR 7 would be due in February 2017
- The HH submits the SAR 7 in March 2017 after the extended filing date
- In this case, good cause will be approved, documented in the case record and benefits will be restored effective March 1, 2017 with no break in aid

# GOOD CAUSE EXAMPLE 2

- Same Scenario
- The HH submits their SAR 7 in April 2017
- The discontinuance effective at the end of February is still valid and the household must reapply for benefits
- Good cause can only be used in the calendar month following the discontinuance

# GOOD CAUSE EXAMPLE 3

- Same Scenario
- Household is recertified as normal in August 2016 – because no SAR 7 was due
- The HH submits their first SAR 7 on time
- HH is recertified until August 2017 and their next SAR 7 will be due February 2018
- Because this is now beyond 12 months from conversion for this HH, good cause will not be applied for a late SAR 7 unless the HH meets existing criteria

# THINGS TO CONSIDER...

- A small portion of the CF caseload are currently classified as change reporters who are also receiving CalWORKs
- Let's follow an example...

# EXAMPLE 1

- 60 year old elderly woman with 5 year old child
- Annual Reporting/Child Only (AR/CO) case (CalWORKs)
- She has earned income
- 24 month certification for CalFresh
- 12 month certification for CalWORKs
- She will have a SAR 7 due at 6 months

# EXAMPLE 2

- 60 year old elderly woman with 5 year old child
- Annual Reporting/Child Only (AR/CO) case (CalWORKs)
- She has no earned income
- 24 month certification for CalFresh
- 12 month certification for CalWORKs
  - No SAR 7 for CalWORKs
  - Will turn in a SAWS 2 Plus at 12 months for recertification
- SAWS 2 Plus will count as the 12 month contact for the HH
  - No SAR 7 will be required

# QUALITY CONTROL

- No special procedures are required for these cases.
- No hold harmless period – QC staff will continue reviewing cases using standard procedures.

# NEXT STEPS

- Regional sessions by request
- Data tracking
  - Transition Impact
- Best practices for transition
  - County Spotlight:
    - Solano
    - Orange



# QUESTIONS



# REFERENCES

## Certification Periods

- **MPP 63-504.15** – Certification periods for Households residing on a Reservation
- **MPP 63-504.171** – 24 month certifications for elderly/disabled households
- **MPP 63-504.142** – Certification periods for households consisting of all adult members who are elderly or disabled persons and 12 month contact
- **7 CFR 273.10(f)** – Maximum allowable certification periods

## Change Reporting

- **7 CFR 273.12(a)(1)** – Change reporting household responsibilities
- **MPP 63-505.51** – Change reporting household responsibilities

## Good Cause

- **MPP 40-181.233** – Good Cause Criteria
- **MPP 40-181.234** – Good Cause Provisions – rescinding discontinuance
- **MPP 63-508.64** – Good Cause for failure to submit the QR 7

# THANK YOU!

- Contact Information:

- Amber Bonilla - [Amber.bonilla@dss.ca.gov](mailto:Amber.bonilla@dss.ca.gov)

