



CONSORTIUM REQUEST FOR POLICY CLARIFICATION (CRPC)

CDSS Tracking #2325

Requestor Name: Caroline Bui (916) 282-3668 BuiC@CalSAWS.org	Response Due Date: 09/22/2022
Consortium: CalSAWS	Subject: Paper Applications Prior to RE Interview
WIC/Regulation Cite(s): MPP 63-504.61; 7 CFR 273.2(c)(1); 7 CFR 273.2(c)(1)(ii); 7 CFR 273.2(b)(2); 7 CFR 273.2(b)(4); 7 CFR 273.14(b)(1)(iii); 7 CFR 273.2(c)(7)(viii)(A); 7 CFR 273.2(c)(7)(viii)(D)	References: (include ACL/ACIN, court cases, etc.) ACL 22-20; ACL No. 17-57; ACIN I-60-13
Date of Request: 09/7/2022 Date Closed:	Enter Affected Program(s): CalFresh, CalWORKs

1. What is the SAWS question, issue, or problem?

AB 135 chaptered in WIC Section 18900.4 and ACL 22-20 require all counties to provide CalFresh households with an option to complete an application and recertification by telephone and capture their signature by an electronic signature method, such as recording a telephonic signature (TS) starting January 1, 2023, for counties converted to CalSAWS.

The federal regulation at 7 CFR 273.2(c)(7) allows counties to accept “unwritten” signatures as a generally acceptable method of signing an application or redetermination, which may include electronic, recorded telephonic, or recorded gestured signatures.

7 CFR 273.2(c)(7)(ii) Right to provide written signature. All households have the right to sign a SNAP form in writing.

MPP 63-504.61 – General Requirements: (b) All households shall be provided notice of the impending expiration of their certification period as specified in Section 63-504.251. The CWD also shall provide the household with an application, which may be sent with the notice, including an appointment date for an interview. Or, the application and appointment date may be mailed or given to the household separately. 7 CFR 273.2(c)(7)(viii)(D)/ACL 22-20 states: The State agency shall promptly provide to the household member a written copy of the completed application, with the instructions for a simple procedure for correcting any errors or omissions.

ACIN I 60-13 states: “The use of a telephone signature, as part of the application or redetermination/recertification process, will eliminate the process of mailing documents in order to gather a client’s ink signature.”

Question: Are counties that have adopted the telephonic signature method required to send a paper application prior to the recertification/renewal (RE) interview for:

- A) CalFresh**
- B) CalWORKs**
- C) Combo CalFresh/CalWORKs REs**

2. Proposed resolution (optional)

3. State Response

CalFresh Policy Response:

AB 135 WIC Section 18900.4 and ACL 22-20 require all counties to provide CalFresh households with an option to complete an application and recertification by telephone and capture their signature by an electronic signature method. Per MPP 63-504.61(b), CWDs must provide the household with an application, which may be sent with the notice, including an appointment date for an interview. Or, the application and appointment date may be mailed or given to the household separately. Also, per 7 CFR 273.2(c)(7)(ii), all households have the right to sign a SNAP form in writing. Therefore, counties cannot limit applications to only electronic/telephonic form of signature. All counties are still required to mail the paper recertification forms to CalFresh households.

