

CalSAWS | Enhancement Request (CER)

PPOCs: Please send the completed request to CER@CalSAWS.org and cc your RM.

Submission Date	06/6/22
Title	Remove CF 37 from the CalFresh RE packet or allow counties to opt out of CF and CF/CW RE Packet Batch Job for Non-ESAP Households

Region #: 1	County: Santa Clara	
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Program(s) Impacted:			
<input type="checkbox"/> Adoptive Services	<input type="checkbox"/> ARC	<input checked="" type="checkbox"/> CalFresh	<input type="checkbox"/> Cal-Learn
<input type="checkbox"/> CalWORKS / RCA	<input type="checkbox"/> CAPI	<input type="checkbox"/> Child Care	<input type="checkbox"/> CMSP
<input type="checkbox"/> Foster Care	<input type="checkbox"/> GA/GR	<input type="checkbox"/> GAIN/REP/WTW	<input type="checkbox"/> GROW
<input type="checkbox"/> Kin-GAP	<input type="checkbox"/> Medi-Cal / RMA	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Other – specify			

Area(s) Impacted:			
<input type="checkbox"/> Call Center	<input type="checkbox"/> Case Assignment	<input checked="" type="checkbox"/> Client Correspondence	<input type="checkbox"/> Eligibility
<input type="checkbox"/> Fiscal / Collections	<input type="checkbox"/> Hearings	<input type="checkbox"/> Imaging	<input type="checkbox"/> Lobby Management
<input type="checkbox"/> Reports	<input type="checkbox"/> Resource Data Bank	<input type="checkbox"/> Schedule Appt	<input type="checkbox"/> Security
<input type="checkbox"/> Self Service Portal	<input type="checkbox"/> Special Investigation	<input type="checkbox"/> Task Mgmt	<input type="checkbox"/> Time Limits
<input type="checkbox"/> Training			
<input type="checkbox"/> Interface(s) - specify			
<input type="checkbox"/> Other – specify			

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Justification / Request Summary:

Issue:

Currently, the CalSAWS system is programmed to mail a Redetermination (RE) Packet 15 days prior to the RE due month for all counties, and counties cannot opt-out of the RE Packet Job. The contents of the RE packets are as follows:

CF RE Packet - CF Redetermination Packet	CF Coversheet with BRM and NVRA, CF 29, CF 37, EBT 2216, SAR 7A, PUB 13, PUB 275, PUB 388, GEN 1365, VRC.
CW RE Packet - CW Redetermination Packet	CW Coversheet with BRM and NVRA, GEN 102, CCP 7, SAWS 2A SAR, CW 2166, CW 2184, WTW 5, CW 101, EBT 2216, SAR 7A, PUB 13, PUB 183/PUB 184, PUB 388, CW 52, GEN 1365, VRC.
CW/CF RE Packet - CF/CW Redetermination Packet	CW/CF Coversheet with BRM and NVRA, GEN 102, CCP 7, SAWS 2A SAR, CW 2166, CW 2184, WTW 5, CW 101, EBT 2216, SAR 7A, PUB 13, PUB 275, PUB 183/PUB 184, PUB 388, CW 52, GEN 1365, VRC.

However, sending the current RE packet without offering customers of their option for completing recertification (i.e., RE in CalSAWS) does not meet the requirement stated in [ACL 22-20](#). **AB 135, chaptered in [WIC Section 18900.4](#), requires 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).**

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. Per CDSS, these requirements apply to joint applications with the CalWORKs program in counties that have opted to allow electronic interviews for CalWORKs applicants. The CalWORKs program currently allows electronic signatures for a signed application for individuals who apply over the phone.

The current appointment letter CF 29 or GEN 102 included in the RE packet does NOT inform customers of the ES/TS option. Thus, it does not comply with the federal and state regulation required by AB 135 and ACL 22-20.

Many counties that implemented TS have been accepting “unwritten signature” as a “generally acceptable” method of processing RE under the guidance of ACIN I-60-13 and ACL No. 17-57 and do not mail paper applications prior to an RE interview. Instead, these counties send customers a copy of the completed RE application (Statement of Facts/SAWS 2 Plus) after their RE interview as required by the federal requirements.

Notably, processing paperless RE business process significantly reduced CalFresh discontinuance since the implementation of the TS. The primary reason for CalFresh’s discontinuance was the failure to return the RE paper applications. More than 95 percent of our clients opted for the paperless RE and are extremely satisfied with the simplified process. The paperless RE process enabled counties to save unnecessary paper and mailing costs. Reverting to paper RE applications would significantly burden our customers satisfied with the paperless RE process for many years and increase the case discontinuance rate. In addition, receiving paper RE applications would increase county workload by creating two types of business processes. It may also result in QC citations for taking duplicate signatures if the county worker completes the application over the phone and capture a TS for receiving an incomplete paper application.

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Proposed Recommendation:

Remove the counties that choose unwritten signature (ES/TS) as a generally acceptable renewal process from the RE batch job and do NOT send the RE packet prior to the interview for non-ESAP households. Or add a new RE packet that excludes the CF 37 and or SAWS 2 Plus, or direct the print vendor not to mail the RE packet to those counties. Instead, CalSAWS can batch a cover letter, a copy of the completed application (statement of facts/SAWS 2 Plus), and other county forms after the TS interview is completed to comply with the federal regulations.

Priority/Implementation Consideration(s):

This request is a priority as AB 135 and ACL 22-20 require all 58 counties to offer customers the option of completing a CalFresh interview by electronic/telephonic signature method starting January 1, 2023, for counties converted to CalSAWS. The current process of batching the RE packet prior to the interview does not offer clients the telephone-based renewal/paperless (ES/TS) option. It continues imposing customers to complete lengthy paper applications. Therefore, the current process may not comply with the state regulation required by AB 135 and ACL 22-20 and is not aligned with the federal regulation at [7 CFR 273.2\(c\)\(7\)\(viii\)\(A\)](#).

CalSAWS Response:

CER Tracking #: (automatically generated by JIRA)	SCR #
Rejected By:	Date:
Rejection Reason(s) or other Comments:	