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Change Order Ten Premise Item

1 SCERFRA 25-531 – ABAWD FORM

The CDSS released the CalFresh ABAWD Time Limit Exemption Screening Form (CF 377.11E) via ACL No. 20-19 as required by federal rules. This notice outlines the ABAWD time limit rules and must be provided to individuals who may be subject to the three-month CalFresh eligibility restriction unless they meet work requirements or qualify for an exemption.

CalSAWS must distribute mass mail the CF 377.11E notice to all CalFresh households with potential ABAWDs 30 days prior to H.R. 1 implementation, which is upon completion of automation. In addition, CalSAWS must include the CF 377.11E notice in the recertification package and send it to all households within counties transitioning off an ABAWD waiver at least 30 days prior to implementation.

1.1 Change

Below are the anticipated changes as part of the ABAWD changes:

- **Adobe Rendering Charges** – In support of the one-time informational mailer, there are increased rendering charges.

1.2 Request

Provide an Adobe rendering estimate for the applicable forms.

1.3 Volume Assumptions and Cost

The following table provides the assumptions used to create the estimated cost.

Table 1: Assumptions & Cost – SCERFRA 25-531

Assumption	Value	Description
One-time Informational Mailing • 3,578,248 estimated mail pieces	\$89,456	Adobe Rendering
TOTAL Rendering Cost	\$89,456	One-Time Cost

2 SCERFRA 25-512 – CALFRESH IMPACT ANALYSIS – HR 1

CalSAWS is to remove the automatic assignment of ABAWD countable months prior to counties completing required exemption screening. Per federal regulations at 7 CFR 273.24(k), exemption screening must be complete before the time limit can be imposed on an individual, including the assignment of a countable month. In other words, the system must be automated to require screening at certification and recertification.

When an individual qualifies for more than one exemption, the county must apply the exemption that will be in effect the longest. Per ACL No. 19-93, screening must be completed by counties using individualized evaluations. Counties must not rely only on information available in CalSAWS to determine if an individual meets the criteria for an exemption from the ABAWD time limit.

According to 7 CFR 273.24(k)(1)(i), if during the certification period, an individual loses an existing exemption due to a change in circumstances, the county must not begin assigning countable months until the individual is re-screened to determine whether any other exemptions apply. The county must re-screen at the household's next scheduled recertification. Also, per 7 CFR 273.24(k)(1)(ii), if during the certification period, an individual subject to the time limit experiences a change in circumstances that results in newly qualifying for an exemption, the county must act promptly to apply the exemption once non-questionable information is received that indicates the person is eligible for the exemption and must not assign a countable month. If the information is questionable, the county must promptly verify the information before applying the exemption. Once verified, the county must apply the exemption and ensure no countable months are assigned.

- **One-time Informational Mailing** - Send a one-time mass mailer with Informational Notice to CF households. The informational notice will include the new requirements in the threshold languages.
- **Ongoing NOAs** – NOAs sent on an ongoing basis:
 - NOA Snippet CF377.11
 - NOA Snippet CF377.11A
 - NOA Snippet CF377.11B
 - NOA Snippet CF377.11D
 - NOA Snippet CF377.11E

2.1 Change

Below are the anticipated changes as part of the ABAWD changes:

- **Adobe Rendering Charges** – In support of the one-time informational mailer, there are increased rendering charges. Also in support of the Ongoing NOAs, there are increased rendering charges.

2.2 Request

Provide an Adobe rendering estimate for the applicable forms and NOAs.

2.3 Volume Assumptions and Cost

The following table provides the assumptions used to create the estimated cost.

Table 2: Assumptions & Cost – SCERFRA 25-512

Assumption	Value	Description
One-time Informational Mailing 3,912,443 estimated mail pieces	\$100,989	Adobe Rendering
TOTAL One-Time Mailing Rendering Cost	\$100,989	One-Time Cost
NOA Snippet CF277.11, CF277.11A, CF277.11B, CF277.11D 300,003 estimated monthly mail pieces	\$92,925	Adobe Rendering
NOA Snippet CF277.11E 33,334 estimated monthly mail pieces	\$10,325	Adobe Rendering
TOTAL Annual Rendering Cost	\$103,251	Annual Cost

3 SCERFRA 26-507 – BENEFITSCAL INCOME VERIFICATION SERVICE

California's Payment Error Rate (PER) for CalFresh program is an accuracy measure of each State's SNAP eligibility and benefit determinations, which represents the sum of the underpayment and overpayment of issued benefits. If for two consecutive years, the State PER exceeds 105 percent of the national average by a 95 percent statistical probability, a fiscal penalty may be assessed. There is no fiscal liability during the first year exceeding 105%; any possible fiscal liability begins with the second (and subsequent) years.

CDSS is requiring the integration and automation of client-permissioned income verification data received through TRUV into BenefitsCal through an API.

Additionally, CDSS requires a TRUV QR code be sent with all client verification forms for initial eligibility, SAR, recertification/redeterminations, and any mid-period touchpoints.

3.1 Change

Below are the anticipated changes as part of the BenefitsCal Income Verification changes:

- Infrastructure Changes** – There will be two new endpoints to support functionality of a QR code link to BenefitsCal and implement new servers.
- IAM** – Implement a new OAuth client.

3.2 Request

Establish new endpoints, implement additional servers and a new OAuth client.

3.3 Assumptions and Price

The following table provides the assumptions used to create the estimated cost.

Table 3: Assumptions – SCERFRA 26-507

Assumption
1. The Consortium will be responsible for funding Text and Email services, approximately 1.3 million in total, under the CalSAWS budget.

The following table lists the pricing.

Table 4: Pricing – SCERFRA 26-507

Description	Rate	Hours	Total
Infrastructure Technical Project Manager	\$118.72	4	\$475
Infrastructure Cloud Engineer	\$173.51	50	\$8,676
TOTAL		54	\$9,151

4 SCERFRA 25-540 – PRODUCTION SIMULATION ENVIRONMENT TO SUPPORT FCED API TESTING

Provision and support a new CalSAWS Production Simulation environment that is logically separate from the live Production environment but configured to operate as production-equivalent for security, privacy, and compliance purposes. For purposes of this request, the Production Simulation environment will execute the same eligibility rules, business logic, automated placement change transactions, and interface behaviors as the Production environment, necessary to validate end-to-end bi-directional interface behavior while remaining operationally isolated from live processing.

Data Requirements

To support meaningful testing and accurate validation of FCED APIs, the Production Simulation environment must contain unmasked production data.

Specifically:

- The CalSAWS Production Simulation environment must utilize production data extracts or mirror sufficient to replicate real-world processing scenarios.
- Data must support testing of eligibility, case status, data exchange, and end-to-end workflows.
- Data refreshes will be coordinated and scheduled to balance testing needs with operational considerations.

Security and Privacy Controls

CalSAWS policy prohibits the use of production data in non-production environments. To address this constraint, this SCERFRA formally requests that the Production Simulation environment be designated as a production-equivalent environment. Security and privacy controls must also be consistent with CCWIS data protection requirements and child safety principles.

Accordingly:

- The Simulation environment must be subject to the same security, privacy, and compliance controls as the CalSAWS Production environment, including but not limited to:
 - ✦ Access controls and role-based permissions
 - ✦ Audit logging and monitoring
 - ✦ Data encryption and secure transmission
 - ✦ Incident response and data handling protocols

This designation should enable the use of production data while maintaining compliance with CalSAWS security and privacy standards.

Initial Case Conversion and Linking

To enable FCED API testing in a production-like setting, CalSAWS must support initial case conversion and linking within the Production Simulation environment.

This includes:

- Establishing baseline case data aligned with FCED requirements
- Enabling case identifiers, relationships, and cross-system linkages necessary for API testing.
- Validating converted and linked cases supports end-to-end workflow execution.

Ongoing Coordination and Operational Support

Once the Simulation environment is operational, and ongoing coordination between CalSAWS and FCED will be required.

These provisions include:

- Scheduled coordination on data refresh cycles
- Joint prioritization and resolution of defects identified during testing
- Change management and communication protocols
- Alignment of maintenance windows to minimize disruption

EUST3 Activities

Evaluate the repurpose of STG6 for EUST3 activities. CalSAWS currently utilizes STG6 for integration with CARES QA and had indicated plans to repurpose STG6 for EUST3 activities. Please evaluate the availability of an alternative environment to support EUST3 to avoid disruption to FCED QA testing. If an alternative environment cannot be provided, FCED QA activities need to be temporarily paused for the duration of EUST3.

4.1 Change

The CalSAWS Production Simulation environment has been provisioned and configured. The environment will be used exclusively for controlled production-like testing and validation. The scope includes:

- Ongoing environment maintenance and operational support through October 2026

4.2 Request

The SCERFRA requests CalSAWS establish a Production Simulation environment to enable end-to-end testing of FCED APIs using production data prior to go-live. The objective is to mitigate CARES implementation risk, validate real-world data interactions between CARES and CalSAWS, and verify system readiness without disrupting the live production environment.

4.3 Assumptions and Price

The following table provides the assumptions used to create the estimated cost.

Table 5: Assumptions – SCERFRA 25-540

Assumption
1. This estimate will require Oracle sizing, new cores to support the IBM rules engine for any new API(s), and additional recurring AWS charges for a period of 4 months (between July 2026 – October 2026) which are not included in the personnel support pricing shown below.

The following table lists the pricing.

Table 6: Pricing – SCERFRA 25-540

Description	Rate	Hours	Total
Infrastructure Technical Project Manager	\$116.39	12	\$1,397
Infrastructure Cloud Engineer	\$173.51	80	\$13,881
TOTAL		92	\$15,278

Record of Change

The following changes have been made to this document.

Table 7: Record of Change

DOCUMENT PHASE	DATE CHANGED	CHANGE MADE BY	SUMMARY OF CHANGES MADE
1.0	7/6/2026	Ashraf Elsalaymeh	▪ Initial draft
1.1	7/7/2026	Ashraf Elsalaymeh	▪ Minor Edit
			▪
			▪