

**County of San Diego, Health and Human Services Agency (HHSA)
CalFresh Program Guide**

Mandatory Mid-Period Reports

Number

63-283

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Revision:

08/01/2021

Background:

Households have limited mandatory reporting requirements during the period between eligibility reports. On April 15, 2019, the Food and Nutrition Service (FNS) published a final rule for the Supplemental Nutrition Assistance Program (SNAP), which included provisions for implementing the Agricultural Act of 2014.

Purpose:

This section describes mandatory mid-period reporting requirements. The purpose of this material is to notify staff of recent changes to reporting requirements related to lottery and gambling winnings. Households that receive substantial winnings must immediately become ineligible for benefits and remain ineligible until they meet financial resource and income eligibility requirements.

Policy:

Semi-Annual Reporting (SAR) households are notified of their mandatory reporting responsibilities via the recorded Rights and Responsibilities and the **Reporting Changes for Cash Aid and CalFresh** (SAR 2) informing notice. The SAR 2 is issued when the case is initially approved, every 6 months and when the Income Reporting Threshold (IRT) changes during the certification period. The SAR 2 informs households of the following:

- The requirement to report within 10 days when gross monthly income exceeds the IRT
- The consequences for failure to report
- The current IRT amount for the household size and current gross monthly income

Staff are required to take action on specified changes reported on the SAR 7, recertification or during the certification period (mid-period). Mid-period changes include changes that result from:

- Mandatory reports
- Voluntary reports
- County-Initiated actions

All households may report mid-period changes in writing, online, verbally, or in person at any Family Resource Center (FRC).

SAR households may also report changes in writing using one of the forms below:

SAR 3	Mid-Period Status Report for Cash Aid and CalFresh
CF 377.5 SAR	CalFresh Mid-Certification Period Status Report

These forms must be made available at initial application, recertification, or any time the household requests the forms.

1. CalFresh Mandatory Mid-Period Reports:

All CalFresh households subject to SAR are required to report mid-period when:

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- The household's income exceeds the CalFresh IRT for their household size. See 63-1101 for the current CalFresh IRT.
- Able-Bodied Adults Without Dependents (ABAWD) work hours drop below an average of 20 hours a week, or 80 hours a month total, per month.
- The household receives substantial lottery or gambling winnings. Substantial winnings are defined as a cash prize won in a single game, purchase of a ticket, hand, or similar bet, which is equal to or greater than the resource limit for elderly/disabled households. See 63-1101 for the current resource limit.

2. Changes must be reported:

Households are required to report mandatory changes within 10 calendar days of the date the change **becomes known to the household**. The date the change becomes known to the household is the date:

- The household first receives the income exceeding the IRT,
- The ABAWD's work hours drop below 20 hours a week or 80 hours a month, or
- The household receives the substantial lottery or gambling winnings.

3. Income Reporting Threshold:

The IRT is an income threshold that informs the household when they are mandated to make a mid-period report of an increase in income. The CalFresh IRT is the amount likely to make a family ineligible for CalFresh. See Processing Guide 283-01 for additional information regarding IRT. See 63-1101 for the current CalFresh IRT.

The IRT is updated every October using the Federal Poverty Level (FPL) that was published the previous January. See 63-1101 for the current CalFresh IRT.

4. Evaluation of Over IRT Mandatory Mid-Period Report:

The household is required to report mid-period when their income exceeds their IRT. The IRT limits apply to all members of the household, including ineligible noncitizens. Below are examples of over IRT mandatory mid-period reports:

Example 1:	
Scenario	On April 15 th a SAR household reports mid-period that their income has increased over the IRT. The household expects the income will continue at this level.
Outcome	Send the CF 32 requesting proof of income allowing 10 days to provide. If the household fails to provide verification of income by the due date, discontinue the case with timely notice effective May 31 st for failure to provide information.

Example 2:	
Scenario	A household with SAR cycle 1 reports a mid-period increase in income. The income could be over IRT. The income change is expected to continue.

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Outcome	Request income verification via the CF 32. If the household sends the verification timely, terminate or decrease benefits with timely notice. Even if the verification shows the income is under IRT, the report is now Verified Upon Receipt (VUR) (the household sent the verification).
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Examples of IRT for Households with Excluded Members:

Example 1:	
Scenario	A household of three with no income, includes one ineligible noncitizen. The household's IRT for three is \$2,353 (effective 10/01/2020). The household reports on the SAR 7 that the noncitizen member found work, which is expected to continue. The monthly income is \$3,000.
Outcome	Prorate the noncitizen's income to determine if the income is over the IRT: $\$3,000 / 3 = \$1,000$ $\$1,000 \times 2 = \$2,000$ The household is not over the IRT. Update the CalFresh budget effective the month after the submit month (with timely notice).

Example 2:	
Scenario	Same household situation as above. However, one of the eligible members earns \$1,000/month. The household reports on the SAR 7 that their income is now \$4,000 with the ineligible noncitizen earning \$3,000/month.
Outcome	The worker will prorate the noncitizen's income and add it to the eligible household member's income: $\$3,000 / 3 = \$1,000$ $\$1,000 \times 2 = \$2,000$ $\$2,000 + \$1,000 = \$3,000$ The household is over the IRT. Reevaluate the household's budget and decrease/discontinue the case with timely notice.

NOTE: Due to the income proration computation, households with noncitizens may not always know when their income may be over the IRT or if an income change may increase their benefits. Encourage households with noncitizens to report all changes to be able to issue additional benefits timely or to avoid overissuances.

5. California Work Opportunity and Responsibility to Kids (CaWORKs)/Public Assistance CalFresh (PACF) Cases:

Some mid-period changes are required to be reported for the CaWORKs program that are not required to be reported for CalFresh. CaWORKs households are required to report the following changes within ten days:

- When income exceeds the CaWORKs IRT

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- Drug felony convictions (no action for CalFresh)
- Fleeing felon status
- Violations of conditions of probation or parole
- Address changes

For CalWORKs/PACF cases, if the Assistance Unit (AU) reports a change that is mandated to be reported for CalWORKs, take action on the PACF case to reduce or discontinue benefits only if CalWORKs takes action on the change.

If an AU reports income that is over the CalWORKs IRT that results in a change in the CalWORKs case, the worker will also take action on the CalFresh case and recalculate the allotment.

Example 1:

Scenario	<p>A non-exempt AU/household of three has gross earned income of \$1,200 per month. The SAR Payment Period is January through June, and benefits have been determined using monthly income of \$1,200.</p> <p>On February 15, the mother reports that her monthly earnings increased to \$1,800, which is greater than her CalWORKs IRT of \$2,196 (the CalWORKs Tier 1 IRT for an AU of three (effective 10/1/2020) and that she anticipates this income will continue at that level.</p>
Outcome	<p>After applying the appropriate income disregards, the CalWORKs worker determines that the AU is financially ineligible for CalWORKs.</p> <ul style="list-style-type: none"> • Discontinue the CalWORKs case (without waiting for verification of the new income) effective February 28. The family is no longer Categorically Eligible for CalFresh once cash aid is discontinued due to financial ineligibility. • Discontinue CalFresh effective February 28 because action has been taken on a CalWORKs mandated report. • Transitional CalFresh (TCF) would begin March 1 with an allotment amount equal to the last month of CalWORKs eligibility adjusted for the loss of the CalWORKs grant (63-321).

Example 2:

Scenario	<p>A non-exempt AU of three has no income and is currently in the July through December SAR Payment Period. Their grant amount is \$983 (CalWORKs Tier 1 IRT of \$996 effective 10/1/2020). On September 25 the household reports that the mother got a new job in August and will be paid twice a month. She received her first two paychecks of \$500 on August 15 and 31.</p>
Outcome	<p>The AU's grant and allotment amount is recalculated based on this new income.</p> <ul style="list-style-type: none"> • Because the AU exceeded their IRT on August 31 and the household did not report the income over IRT timely for CalWORKs (by September 10; within 10 days of receipt) and there is no time to decrease the grant amount for October, her grant will be recalculated effective November 1, but she will have a CalWORKs overpayment for September and October.

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	<ul style="list-style-type: none"> The CalFresh allotment amount will also be recalculated effective November 1 because this is a mandatory report for CalWORKs and CalWORKs is taking action on the case. <p><i>Do not establish an overissuance for CalFresh because the CalWORKs IRT report is not a mandatory report for CalFresh.</i></p>
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6. Report of Fleeing Felon Status, Parole/Probation Violations for CalWORKs:

When a CalWORKs/PACF household reports a change in fleeing felon status or a parole/probation violation that is confirmed for the CalWORKs case, take action on the reported information in the CalFresh case because action is being taken on a CalWORKs mandated report. Discontinue the individual from CalFresh at the same time as CalWORKs, at the end of the month with timely notice.

NOTE: Non-Assistance CalFresh (NACF) households are not required to report a change in fleeing felon status or probation/parole violations during the certification period.

Example 1:	
Scenario	An AU/household is in the semi-annual period of January through June. On March 20, the AU reports timely that the mother is a fleeing felon effective March 10.
Outcome	<p>This is a mandatory report for CalWORKs. Discontinue the mother from CalWORKs, and CalFresh effective April 1 with timely notice.</p> <ul style="list-style-type: none"> Assess a CalWORKs overpayment for April, and Do not establish an overissuance for CalFresh because the fleeing felon report is not a mandatory report for CalFresh.

7. CaWORKs/PACF Cases - Voluntary Reports:

If the AU/household **voluntarily** reports a change that is not required to be reported for CalWORKs, take action on the PACF **only if the reported change is VUR** regardless of whether or not CalWORKs takes action.

Example 1:	
Scenario	The AU/household reports that a household member has left the home.
Outcome	<p>CalWORKs: Since this is a voluntary report for CalWORKs, do not take action to discontinue the person from CalWORKs.</p> <p>CalFresh: The report is considered VUR for CalFresh. Therefore, discontinue the household member from CalFresh mid-period with timely notice.</p>

When an AU/household reports an income change mid-period that is under the CalWORKs IRT and CalWORKs does not take action, take action on the CalFresh case **only if the report is VUR**.

Example 2:	
Scenario	An AU/household reports mid-period an increase of income they believe is over the CalWORKs IRT. At the same time as the report, the household provides

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	verification of the new income and expects the income increase will continue for the remainder of the certification period.
Outcome	<p>CalWORKs: The AU is not required to report the income increase and the income is not over the CalWORKs IRT. Do not decrease CalWORKs benefits.</p> <p>CalFresh: Since all the information and verification was received and there is no need to contact the household for additional information, decrease CalFresh benefits mid-period with timely notice because the report is considered VUR.</p>

Example 3:	
Scenario	An AU/Household reports mid-period a pay increase of 50 cents per hour. The income is below the CalWORKs IRT.
Outcome	<p>CalWORKs: The AU is not required to report the income increase. Verification is not required because the income increase is clearly below the CalWORKs IRT. Do not take action to decrease benefits.</p> <p>CalFresh: Since the report is voluntary and CalWORKs did not take action and did not require verification, do not decrease CalFresh benefits because the report is not VUR.</p>

8. Report of Reduction in ABAWD Work Hours:

ABAWDs are required to report all changes that would affect CalFresh eligibility on a semi-annual basis on the SAR 7 or recertification. In addition, ABAWDs who are meeting the work requirement through employment are required to report within 10 days when hours of work drop below 20 hours per week or 80 hours per month.

Determine ABAWD status prospectively on a semi-annual basis.

NOTE: ABAWDs reporting requirements are not currently in force because a waiver is currently in effect exempting ABAWDs from work requirements.

9. Report of Substantial Lottery or Gambling Winnings:

Households must report receipt of substantial winnings anytime during the certification period. The dollar amount of the substantial winnings is determined before taxes or any other withholding. Households that receive substantial winnings must immediately become ineligible for benefits and will remain ineligible until they meet financial resource and income eligibility requirements. When a household discontinued due to the receipt of substantial winnings reapplies, the household is not considered categorically eligible (CE) or modified-categorically eligible (MCE).

If the household member shared the winnings with a non-household member, the portion allocated to the household must be considered to determine if they are required to report mid-period.

This requirement applies even if the household immediately spends or loses a substantial portion of the winnings and the remaining winnings are below the resource limit for elderly/disabled households.

See Processing Guide 283-01 for more information regarding Substantial Winnings including actions to take when a discontinued household reapplies.

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Other Program Impacts:

No Impact

References:

CFR 272.1, 272.2, 272.17, 273.8, 273.9, 273.10, 273.11, 273.12, 273.13 and 273.18

ACL 12-25, 12-25E, 12-59, 13-08, 13-17, 13-26, 13-80, 15-42 and 20-132

ACIN I-58-13 and I-58-13E

Processing Guide 283-01

Sunset Date:

This policy will be reviewed for continuance by 07/31/2024.

Approval for Release:



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Self-Sufficiency Services