



**United States  
Department of  
Agriculture**

Food and  
Nutrition  
Service

Western Region

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Suite 10-100  
San Francisco, CA  
94103

FS-10-6/Waiver #2070014

May 17, 2007

Ms. Charr Lee Metsker, Deputy Director  
Welfare to Work Division  
Department of Social Services  
744 P Street, MS 17-08  
Sacramento, CA 96251

Dear Ms. Metsker:

This is in response to your April 2, 2007 letter requesting waiver approval of the face-to-face interview at recertification [7 CFR 273.14(b)(3)] and the face-to-face interview at initial and recertification for those households in which all members are elderly or disabled regardless of income source [7 CFR 273.2(e)(2)].

California Department of Social Services (CDSS) now conducts face-to-face interviews for almost all recertifications unless CDSS makes an individual determination of hardship and documents that hardship in a household's case record. CDSS also conducts face-to-face initial certification interviews with pure elderly/disabled households unless a face-to-face interview would be a hardship.

As pointed out in your request, these practices may constitute obstacles to clients' access to our Program and may impede retention of participating households. These practices also add to the workload of the county welfare offices in California. You have proposed to solve these problems and to streamline office operations by foregoing the documentation of hardship for most households at recertification. Telephone interviews will replace these face-to-face interviews. You also propose to eliminate the documentation of hardship at initial certification for households whose members are all either elderly or disabled. This solution requires waivers of 273.14(b)(3) and 273.2(e)(2) for non-elderly/disabled households at recertification. Also required is a waiver for both initial certifications and recertifications for elderly/disabled households with earnings. Because CDSS has the authority to waive face-to-face interviews for elderly/disabled households without earnings, these waivers do not apply to these households.

We are approving your request, because it is important that California county welfare departments use their limited resources efficiently. These waivers will also make it easier for many households to participate in the Food Stamp Program. This is particularly true of households with earnings, who will be able to participate in interviews without taking time off from work to visit the county welfare offices. Please note that only the face to face aspect of interviews is being waived; telephone interviews must still be conducted. Also, a face to face interview must be provided for anyone who requests it.

Ms. Charr Lee Metsker, Deputy Director

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As requested, we are approving these waivers for 2 years; however, after 1 year, the State must provide an interim report that contains the information described in item 12 of the enclosed waiver response.

It is our understanding that CDSS will continue to require finger-imaging for many household members. Therefore, even though these households will receive telephone interviews, many household members will still have to come to local offices no later than their first recertification to comply with this requirement.

If you have any questions, you may contact Ed Mars at (415) 705-1361, ext. 309, or Patricia Cruise at (415) 705-1361, ext. 307.

Sincerely,



DENNIS STEWART  
Regional Director  
Food Stamp Program  
Western Region

Enclosure

cc: Richton Yee, FSB, CDSS, MS 16-32, Sacramento, CA w/enc.  
Michael J. Papin, FSPB, FSB, CDSS, MS 16-32, Sacramento, CA w/enc.  
Hector Hernandez, FOB, FSB, CDSS, Los Angeles, CA w/enc.  
Anna Capetillo, FDRAB, CDSS, MS 12-57, Sacramento, CA w/enc.  
PDD, FSP, Alexandria, VA  
CA SPO, POI, FSP, WRO

## WAIVER RESPONSE

1. Waiver serial number: 2070014
2. Type of request: Initial
3. Primary regulation citation: 7 CFR 273.14(b)(3)
4. Secondary regulation citation: 7 CFR 273.2(e)(2)
5. State: California
6. Region: Western
7. Regulatory requirements:

7 CFR 273.14(b)(3) requires a state agency to conduct a face-to-face interview at least once every twelve months and, by cross-reference to 273.2(e), to document each instance of waiving the face-to-face aspect of an initial interview when the waiver is based on hardship for the household.

7 CFR 273.2(e)(2) requires a state agency to document each instance of waiving the face-to-face aspect of an initial interview when the state agency's bases their decision on the hardship that a face-to-face interview would entail.

8. Description of proposed alternative procedures:

Non-elderly / disabled households

When recertifying periodic reporting households, California's Department of Social Services (DSS) will:

- Conduct telephone interviews. DSS will not document hardship for these households.
- Recertify Public Assistance households using current forms.
- Recertify Non-Assistance households using the household's QR-7, the Quarterly Report Form and a recertification form.
- Conduct a face-to-face interview when either of the following occurs:
  - DSS determines that a face-to-face interview is necessary, or
  - The household requests a face-to-face interview.

Elderly / disabled households

DSS will use the following alternative procedure only for households whose members are all either elderly or disabled.

- At initial certification and recertification, DSS will conduct telephone interviews. DSS will not document hardship for these households.
  - DSS will certify these households initially using the Standard Application Form, DFA 285 A1.
  - DSS will recertify these households using the Statement of Facts, DFA 285 A2.
9. Action and reason for approval or denial: We are approving this waiver. California's Food Stamp Program is not in the first year of liability. California's official payment error rate for Fiscal Year 2005 was 6.38%.
- Our approval of the waivers for elderly / disabled households concerns only those households with earned income. DSS already has the authority under the Food Stamp Program's regulations (273.2(e)(2)) to waive the face-to-face interview for elderly / disabled households without earnings.
10. Regulatory or legislative basis for action: 7 CFR 272.3(c)(1)(ii), which allows the Food and Nutrition Service to approve waivers that would result in a more effective and efficient administration of the program.
11. Conditions and reasons:
- DSS must grant a face-to-face interview if a household or their authorized representative asks for one.
  - As long as DSS requires finger-imaging, some household members will still have to provide finger images in person, no later than their first recertification.
  - After twelve months of operation of this waiver, DSS will provide an interim report that contains the information that we describe in item 12.
12. Information required for extension: DSS's quality control (QC) system must identify all sampled active cases that receive an initial certification or recertification through a telephone interview. From these households, DSS must provide QC payment accuracy data for the following groups of households. DSS should report these data separately for the elderly / disabled households with earned income and for the non-elderly / disabled households:
- Initial applications under the waiver
  - Initial applications approved with a face-to-face interview
  - Recertified cases under the waiver
13. Expiration date: This waiver will be in effect from July 1, 2007 through June 30, 2009. If DSS wants to change the date of implementation, please advise FNS immediately so that the waiver's effective dates may be adjusted.
14. Limitation, if any, on regional office approval of like requests: Approval of this waiver is limited to the California Department of Social Services.
15. Quality control procedures: No special QC procedures are required for cases subject to the provisions of this waiver. Cases should be reviewed using standard review procedures contained in the FNS Handbook 310.

16. Date of national office action: May 10, 2007.
17. Date of State agency's request: April 2, 2007.
18. Date of regional office transmittal of request to national office: April 19, 2007.