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Dear Ms. Alverson,

Below are comments on the Amendment to California Code of Regulations, Title 5, regarding 12-Month Eligibility and CalWORKs.

Title 5 section	Comments
<p>Section 18081(b)(2)(F): Documentation that the parent is participating in vocational training;</p> <p>-and</p> <p>Section 18085.5(a)(6): Parent is participating in vocational training as defined in section 18078(v);</p>	<p>For consistency, recommend changing the word “participating” to <u>enrolled</u>. The word enrolled is used in the definition of Vocational Training (Section 18078 (v)).</p>
<p>Section 18082.1 (e)(3): When there is substantiated evidence of fraud that invalidates the prior determination of certification/recertification.</p>	<p>Recommend that “substantiated evidence” be defined in order to provide consistency among all contractors.</p>
<p>Section 18082.2 (g): The contractor shall make every effort to make the recertification process easier on families by providing evening and weekend appointments and appointments at alternative locations as needed.</p> <p>-and</p>	<p>Recommend including “and as appropriate” to accommodate for contractors who may be located in high crime areas or other situations that do not allow for evening/weekend appointments due to safety concerns. “The contractor shall...alternative locations as needed <u>and as appropriate.</u>”</p>

<p>Section 18410.1 (f): The contractor shall make every effort to make the recertification process easier on families by providing evening and weekend appointments and appointments at alternative locations as needed.</p> <p>-and</p> <p>Section 18425.1 (f): The contractor shall make every effort to make the recertification process easier on families by providing evening and weekend appointments and appointments at alternative locations as needed.</p>	
<p>Section 18082.3 (f)(3): Issue a Notice of Action pursuant to section 18095 within 14 or 19 days prior to the effective date of action; and</p>	<p>In Section 18082.3(e)(1)(B), it states that the parent shall in writing state an effective date of the proposed reduction of service level. However, in Section 18082.3(f)(3), it states that the contractor must issue a Notice of Action 14 or 19 days prior to the effective date. If the effective date of the reduction of services, as requested by the parent, occurs within less than 14 or 19 days, is the effective date changed to meet the 14 or 19 days?</p>
<p>Section 18083.1 (a)(1)(F): County welfare department records; or</p>	<p>This section states that contractors may use county welfare department records for determination of a child as part of the family. What if that same document states a second adult in the home yet the parent is signing the 9600 under penalty of perjury that the parent is a single parent? Parents are no longer required to submit additional information documenting the presence or absence of the second parent, yet the same document contractors are using to verify a child is IN the home, is in direct conflict with the parent reporting the second adult as being OUT of the home. What course of action should be followed when county welfare department records are in direct conflict with the</p>

	parent’s own reporting of the numbers of adults in the household?
<p>Section 18084 (a)(1)(B): Payroll check stubs, or an independent letter from the employer, or other record of wages issued by the employer for either one of the two-month window immediately preceding the initial certification, or the recertification of eligibility for services.</p> <p>-and</p> <p>Section 18084 (a)(3): If the parent is self-employed, the parent shall obtain and provide a combination of documentation necessary to establish current income eligibility for either one of the two-month window immediately preceding the initial certification, or the recertification of eligibility for services. Documentation shall consist of a self-certification of income as defined in section 18078(s), and may consist of as many of the following types of documentation as necessary to determine income:</p>	<p>The statement “...for either one of the two-month window immediately preceding the initial certification or the recertification...” is not clear. This makes it sound as if the income documentation needs to be from one calendar month or the other. In the document titled ‘Initial Statement of Reasons’, the explanation is more plainly worded and states “...documentation of income can be from either of the two months immediately preceding a determination of eligibility...” This line clearly indicates that the documents can be from both months such as, for example, the last two weeks of June and the first two weeks of July. Recommend changing “...for either one of the two-month window...” to “...from either of the two months immediately...”</p>
<p>Section 18084 (a)(2): When the employer refuses or fails to provide requested documentation or when the parent states a request for documentation would adversely affect the parent's employment, the parent shall obtain and provide other means of verification that may include a list of clients and amounts paid, quarterly estimated tax statements, or other records of income to support the reported income, along with a self-certification of income.</p>	<p>The statement “...along with a self-certification of income...” is not clear. Does this mean that the parent’s self-certification is in addition to the “other means of verification” or, does “along with” mean that a self-certification is to be <i>included</i> as one of the “other means of verification?”</p>

<p>Sections 18409. Enrollment into CalWORKs Stage 2 by Transfer from a Stage 1 CalWORKs Agency.</p> <p>-and</p> <p>Section 18409.3. Enrollment into CalWORKs Stage 2 When Transferring from Another CalWORKs Stage 2 Agency.</p> <p>-and</p> <p>Section 18409.5. Enrollment into CalWORKs Stage 2 When Not Transferring from Another CalWORKs Agency.</p> <p>-and</p> <p>Section 18424. Enrollment into CalWORKs Stage 3 By Transfer from Another CalWORKs Agency.</p>	<p>Recommend that a statement be made in the sections listed stating that the transferring contractor, if applicable, shall inform the new contractor the date when CalWORKs cash aid was terminated as that date determines the recipient's eligibility for Stage 2 as well as the timing for transfer to Stage 3.</p>
<p>Section 18082.1. Recertification of Eligibility.</p> <p>-and</p> <p>Section 18410.1. Recertification of Eligibility for Stage 2.</p> <p>-and</p> <p>Section 18425.1. Recertification of Eligibility for Stage 3 Services.</p>	<p>Clarification is needed as to when it is okay to send a Notice of Action for disenrollment if the family fails to appear and/or complete recertification within the 45 days after the 12-Month eligibility period is over. Is the disenrollment NOA to be sent on day 46, or 14/19 days prior to day 45?</p>

Thank you for the opportunity to provide comments. Should there be any questions, comments, or concerns, I can be reached at LoritaRiga@gmail.com.

Sincerely,

Lorita Riga, Alameda County Pilot Manager

On behalf of the Alameda County Eligibility and Enrollment Work Group Committee.