A Short History of Semi-Annual Reporting in California

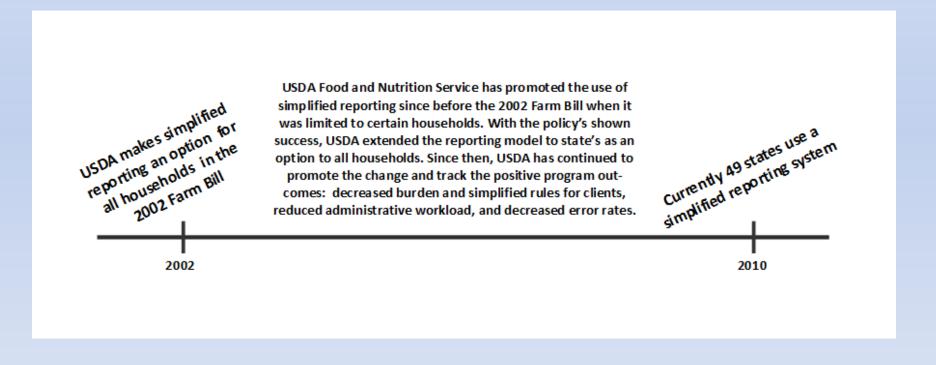
Developed as part of the Campaign for 6 Month Reporting

For more information visit:

http://www.cfpa.net/foodstamps/semi-annual.html

History of Semi-annual Reporting (SAR)

Short Federal History



History of SAR in California

- **2002:** Budget trailer bills AB 444 and AB 692, establish a modified quarterly reporting system in California; implementation is complete by Spring of 2004.
- 2002-07: USDA continues to support the implementation of simplified reporting across the country; a number of states begin the transition.

2007: In correspondence to USDA CDSS states their intention to move to SAR/simplified reporting in the future, but requests approval for a waiver extension of the current quarterly reporting system; a two year extension is granted.

In California's cover letters for its 2007 waiver extension request and its current request, DSS acknowledged its intent to move to SR. In spite of the stated intention, DSS has requested a four year extension of its QR waiver. DSS maintains that the four year extension is necessary to obtain the statutory approvals necessary to convert to SR. DSS also states that the conversion requires significant up-front costs and that California's current financial climate will not permit the expenditures necessary for the conversion.

Taken from September 22, 2009 correspondence from USDA FNS to CDSS (addressed to Ms. Charr Lee Metsker) regarding Waiver 2030030, extension of waivers to administer modified quarterly reporting.

- **2007-2009:** CDSS continues to operate a quarterly reporting system, despite several legislative attempts to move to SAR.
- August 2009: California submits to USDA a request for a four year waiver extension to continue operating the current quarterly reporting system.

September 2009:

Advocates from across the state submit a letter to **USDA** denouncing CDSS's request for a waiver extension of the current quarterly reporting system; Advocates ask that the request be denied.













Janey Thornton Deputy Undersecretary Food, Nutrition and Consumer Services United States Department of Agriculture 1400 Independence Ave., S.W. Washington, DC 20250

Re: California SNAP Waiver Extension Request



Dear Ms. Thornton,



California has been making progress in improving the Food Stamp Program (our Supplemental Nutrition Assistance Program). Under the leadership of John Wagner, the Director of the California Department of Social Services (CDSS), the state has most recently moved to remove the asset test for households with children, made it easier for aged-out foster youth to obtain food stamps, and begun developing a new name and brand for the program in California. But given our historic problems with participation, we certainly must do more. We must follow the lead of other states and take advantage of federal options to improve access and operate more efficiently. Continuing our efforts to increase participation will of course help lowincome Californians. And, due to the size of our state, our efforts will also drive national participation rates and contribute towards the President's goal to eliminate childhood hunger



One of the single most important things we can do to increase participation while streamlining program administration is to join the 48 other states who have moved to simplified reporting. USDA, states and program experts have long heralded this option as one of the single most important ways to improve participation. We believe that USDA can play an important role in getting this needed change moving once again in California.



Since 2002, California has operated a combined periodic-change reporting system for food stamps with reports due on a quarterly basis. This system has required a waiver, #2030030, which was renewed twice. When requesting an extension of the waiver in 2007, CDSS indicated its commitment to moving to semi-annual reporting. The current waiver is set to expire on September 30, 2009. To ensure that the transition to simplified reporting is not held up any longer, we respectfully request that you reject further extensions of waiver



By rejecting another extension of the waiver, USDA will be honoring the commitments made by CDSS. Since 2005, the Western Regional Office of FNS has been encouraging California to move to simplified reporting to enjoy the benefits of administrative relief, error rate reduction and improved client access. In 2007, CDSS asked for more time so that the semi-annual reporting system could be developed. We believe that rejecting an additional extension would provide the impetus for accelerated movement toward semi-annual reporting. The California Legislature supports the move to semi-annual reporting. The County Welfare Director's Association and client advocate groups do as well. Governor Schwarzenegger himself has



September 2009: USDA denies California's request to extend the current quarterly reporting waiver. Instead, USDA offers a 6 month extension on the condition that CDSS submit a plan within that 6 months outlining a move to simplified reporting.

While FNS appreciates California's legal and financial constraints, FNS must balance California's concerns with FNS' responsibility to ensure program accuracy and program access for low-income households. Therefore, FNS is approving DSS' waiver request for a 6 month time period; this approval period is intended to support and expedite the State's conversion to SR while also preserving DSS' QR system during this process. As a condition to FNS' waiver extension, DSS must use the approval period to develop and submit to FNS by February 15, 2010 an action plan to convert to SR. The action plan must set milestones for securing any necessary legislative changes and securing changes in California's automation systems necessary to support the new reporting system.

Taken from September 22, 2009 correspondence from USDA FNS to CDSS (addressed to Ms. Charr Lee Metsker) regarding Waiver 2030030, extension of waivers to administer modified quarterly reporting.

December 2009: AB 1642 (Beall) is introduced as a legislative vehicle to implement SAR

January 2010: Dept. of Defense (DOD)
appropriations funds are made available for improving the Food Stamp Program.
Governor's proposed budget includes use of the \$30 million to "replace" previously allocated state Food Stamp dollars, therefore backfilling the state General Fund

April 2010: USDA accepts CDSS's plan and grants a 12 month waiver extension to carry out the plan. USDA will check-in on CDSS's progress in April of 2011.

Accordingly, FNS is approving DSS' waiver request for a 12-month period from April 1, 2010 through March 31, 2011, during which time my Regional staff will be able to work closely with DSS to shorten the plan timeline and monitor DSS' progress towards conversion. FNS believes that this 12-month approval period will both support and expedite DSS' conversion to SR while also stabilizing DSS' QR policy during the process. FNS will provide additional extensions of the QR waivers if DSS demonstrates a commitment to accelerated progress towards SR conversion and if additional extensions are found to be necessary and appropriate.

Taken from correspondence dated April 5, 2010 from USDA FNS to CDSS (addressed to Mr. John Wagner) regarding California's plan to convert to SAR and the necessary waiver extension.

April 2010 to Present:

- Advocates continued to voice concern over the misuse of the \$30 million in DOD funds, yet a budget is passed with the DOD funds "replacing" previously allocated Food Stamp dollars in the General Fund.
- AB 1642 did not make it through appropriations and the legislative vehicle to implement SAR, a necessary component of CDSS's plan, is lost.
- Assembly Member Fuentes has introduced CalFresh legislation, which includes a move to SAR
- Today- Advocates launch a campaign for SAR

• **February 2010:** CDSS submits a plan to move to SAR. The plan is contingent on state statutory change to implement SAR.

On a policy basis, we believe that moving to SAR is preferable to federal QR. However, given the need for a state statutory change, current fiscal constraints (which may have solutions), and the time it would take to allow us to convert to SAR without undue harm to our clients or our county partners, we do not presently have the ability nor authority to provide the public commitment to implementation of SAR that FNS has requested. We have, however, endeavored to provide realistic plans and timelines for the implementation of either SAR or federal QR.

Taken from correspondence dated February 11, 2010 from CDSS to USDA FNS (addressed to Mr. Stewart) regarding the request for a four year extension of waiver #2030030 and the subsequently requested plan to move to simplified reporting (SAR).

Questions about semi-annual reporting in California?

Contact: Alexis Fernandez at

510-433-1122 x 111 or alexis@cfpa.net

Visit: http://www.cfpa.net/foodstamps/semi-annual.html