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Sacramento, California
October 28, 1971

Honorable Anthony C. Beilenson
Senate Chamber

Welfare - #20083

Dear Senator Beilenson:

FACTS

Section 44-115.61 of proposed State Department of Social Welfare regulations reduces grants to AFDC children living with nonneedy relatives who are not responsible for the support of the children. In essence, they treat board and lodging, including the value of shelter and utilities, provided by the relatives as an in-kind contribution in all cases, thus reducing the grant.

QUESTION

Is Section 44-115.61 of the proposed SDSW* regulations a proper construction of the law?

* State Department of Social Welfare

OPINION AND ANALYSIS

Public Social Services Manual Section 44-115.61 reads in pertinent part as follows:

".61 Treatment of Contributions

"The excess of the in-kind income value for housing and utilities (see .9 below) included in the minimum basic standard of adequate care figure (Section 44-315.511(a)) for the appropriate size Family Budget Unit over the increased cost of housing and utilities to the nonneedy relative caused by the presence of the AFDC child(ren) in his household shall be considered a contribution in-kind to the Family Budget Unit." (Emphasis added.)

Regarding availability of income, including in-kind income as covered by the above regulation, Section 233.90 of Volume 45 of the Code of Federal Regulations (36 Federal Register 3868 and 3869), provides in pertinent part the following:

"(a) State plan requirement. A State plan under title IV-A of the Social Security Act must provide that the determination whether a child has been deprived of parental support or care by reason of the death, continued absence from the home, or physical or mental incapacity of a parent, or (if the State plan includes such cases) the unemployment of his father, will be made only in relation to the child's natural or adoptive parent, or in relation to the child's step-parent who is ceremonially married to the child's natural or adoptive parent and is legally obligated to support the child under State law of general applicability which requires stepparents to support stepchildren to the same extent [sic] that natural or adoptive parents are required to support their children. Under this requirement, the inclusion in the family, or the presence in the home, of a 'substitute parent' or 'man-in-the-house' or any individual other than one described in this paragraph is not an acceptable basis for a finding of ineligibility or for assuming the availability of income by the State.

In establishing financial eligibility and the amount of the assistance payment, only such net income as is actually available for current use on a regular basis will be considered, and the income only of the parent described in the first sentence of this paragraph will be considered available for children in the household in the absence of proof of actual contributions." (Emphasis added.)

As shown in the above provisions, federal law requires that only the income of a person legally obligated to support be considered for grant or eligibility purposes, unless other income is actually available for current use of the child on a regular basis.

The SDSW regulations, *supra*, assume that the difference between the AFDC housing and utility allowance and the increased cost of such items to the nonneedy relative caused by the presence of the AFDC children in his household is an in-kind contribution by the relative. Thus the AFDC housing and utility allowance would only be granted to the extent that the presence of the AFDC child causes increased costs for such items to the nonneedy relative. In other words, the assumption must be made that the nonneedy relative is gratuitously providing the AFDC child with room and board (except to the extent of his increased housing and utility cost), because the state regulation quoted above requires treatment of a specified portion of room and board provided by a nonneedy relative as a contribution in all cases.

In our opinion, the above federal regulation does not permit SDSW to assume in all cases without inquiry that such room and board provided by a nonneedy relative (who is not a responsible relative under law) is currently available to the AFDC child without charge. Federal legislative intent in this area is indicated in the following quotation from Section 3120 of the Handbook of Public Assistance, regarding Section 203.1(a) of Volume 45 of the Code of Federal Regulations, which was later renumbered as Section 233.90 in substantially the same form:

"In some States, policy has been in effect whereby income and resources, not actually available, have been assumed to be available to applicants and recipients, and have been considered so as to reduce the amount of assistance and thus the total amount actually available for meeting the essentials of living. To meet this inequity, a requirement is being added, to become effective July 1, 1967, for all new cases, and for all other cases as they come up for redetermination of eligibility thereafter." (Emphasis added.)

Therefore, we conclude that Section 44-115.61 of the proposed SDSW regulations is invalid for lack of conformity with federal law, because, contrary to the regulations cited, it assumes the availability of in-kind income from a relative not legally obligated to support the AFDC child.

Very truly yours,

George H. Murphy
Legislative Counsel

Christopher Zirkle

By
Christopher Zirkle
Deputy Legislative Counsel

CZ:db

Status of the Unborn Child for Purposes of AFDC

Draft BDEW Regulations, Leading L.A. County To Take Action
on the Status of the Unborn Child

The attached revision of the EAS Manual (Divisions 40, 41, 42, 44, 45 and 48) contains the following:

1. Separation of Eligibility and Grant Determination Processes.

Contained in this group of revisions are those items of SB 796 and the Governor's Welfare Proposal (Meeting the Challenge) that affect eligibility standards for the public assistance programs. The manual revisions contained in this portion are as follows:

1. The eligibility chapters were rearranged into two sections--Linking Eligibility Factors and Nonlinking Eligibility Factors. Linking Factors--which are now completely contained in Division 41--are those which an applicant must meet to be linked to one or more of the four categorical aids. Nonlinking Factors--which are now completely contained in Division 42--are those which an applicant or recipient must meet to receive a grant under the program to which he is linked.
2. Created a new Linking Factors of Eligibility section--Aged--for the OAS program.
3. Created a new Nonlinking Factors of Eligibility section--Financial Eligibility--to be eligible under this factor an applicant or recipient's nonexempt income (gross less allowable work related allowances) must be less than:
 - 1) total needs in the adult aid programs,
 - 2) the basic standard of adequate care in the AFDC program.
4. Revised Chapter 40-100 to require a county to:
 - 1) determine eligibility - Linking and Nonlinking Factors - before determining grant.
 - 2) verify all eligibility factors.

5. Modified each eligibility section to indicate what evidence is acceptable to support a favorable determination of eligibility.
6. Reclassified the chapters on Responsible Relative and Interstate Cooperation on Recipient Movement to a separate Division 43.
7. Corrected all cross-references in the EAS Manual.
8. Eliminated the exclusion of the value of property in which the applicant or recipient has retained a life estate.
9. Eliminated Eligibility for AFDC Based on the Unborn Child (Administrative Request): Eliminates eligibility for cash grant based on unborn child while retaining program linkage for purposes of medical benefits under Medi-Cal. This was accomplished by:
 - a. Revising Section 41-100.4 to exclude the unborn child in the age requirement (done under Eligibility of College Students).
 - b. Adding Section 41-460, allowing eligibility based on the unborn child for purposes of medical benefits only.
 - c. Deleting all references in Section 44-300 to aid payments for unborn child as well as other incidental references in Divisions 40 through 48.
10. Redefined Unemployment (new Federal Requirement). This was accomplished by revision of Section 41-440 redefining AFDC eligibility of an unemployed parent as working less than 100 hours a month.
11. Lengthened Time for Redetermination of Eligibility (Welfare Reform Item 71-074): Provides revisions necessary to lengthen the required period of time for the redetermination of eligibility. This is accomplished by revision of Section 40-181.(see Item 2).

*Reclassified
42-101*

12. Eligibility Provisions of SB 796:

- a. Verification of Eligibility (Section 23.2): Provides new requirements for authorizing immediate assistance. This is accomplished by revision of Section 40-129.2.
- b. Eligibility of College Students (Section 24.7): Provides limited eligibility for AFDC children age 17 or older. Also revises regulations to exclude eligibility of unborn child-- this is accomplished by revision of Section 42-101.4.
- c. Redetermination of Eligibility Under the Penalty of Perjury (Section 25): Provides for redetermining eligibility based on the recipient's statement of facts under the penalty of perjury. This will be accomplished by requiring at the time of redetermination of eligibility the use of Form WR 2, Statement of Facts, which contains a certification under penalty of perjury-- this provision relates to Sections 40-115.22, 40-157 and 40-181 (see item no. 11).
- d. Immediate Assistance (Section 25.1): Provides for treatment of immediate assistance as advance payment of AFDC and limits it to \$100 with verification of eligibility within five working days-- this is accomplished by revision of Section 40-129.4.

- e. Illegal Aliens (Section 24): Provides for presentation of evidence that an alien applying for public assistance has entered the United States legally and can remain indefinitely, or is not under order of deportation--this is accomplished by amending Section 42-407.12 and adding Section 42-407.13.

DIVISION 41 PUBLIC ASSISTANCE ELIGIBILITY AND AID STANDARDS
CHAPTER 41-100 AGE

Recodified to

DIVISION 42 NONLINKING FACTORS OF PUBLIC ASSISTANCE ELIGIBILITY

CHAPTER 42-100 AGE

42-101 AGE REQUIREMENT

42-101

- OAS .3 An applicant must have reached his 65th birthday by the date aid begins.
- AFDC .4 A child is eligible on the basis of age from verified pregnancy until the 21st birthday and is unmarried.
- .41 A child 16 or 17 years of age, must be:
- .411 Regularly attending school or a training program, or
- .412 Physically or mentally disabled, or
- .413 Employed and contributing to the family or conserving his income for further education or preparation for future employment in accordance with a plan approved by the county welfare department (see income regulations).

.42 A child 16, 19 or 20 years of age must be regularly attending school or a training program.

DC .3 A child is eligible on the basis of age from birth until his 17th birthday only if he is unmarried.

.31 Aid may be granted in behalf of a child to an unmarried person beyond his 17th birthday if he is less than 21 years of age and:

.311 He is regularly attending school or a training program or if enrolled in an institution of higher education he must be:

- a. attending regularly on a full-time basis (the equivalent of at least 12 units)
- b. achieving an average grade that is passing
- c. making progress toward a self support objective, or

.312 he is physically or mentally disabled, or

.313 he is employed and contributing to the family, or applying his earnings to a plan approved by the county department for his further education or preparation for future employment, provided that his earnings set aside for education or training are placed in an irrevocable trust for such purposes, with the county and the parents designated as joint trustees.

41-440 UNEMPLOYMENT OF A PARENT OR PARENTS (Continued)

41-440

FDC

.72 When both parents are in the home but only one is unemployed, the evidence necessary would be the same as that listed in .711 through .715 above and

.721 A written county approved plan for full-time employment for the unemployed parent.

.722 A written county approved plan which details how the children are to be cared for; and

.723 When the unemployed parent is the mother, the plan listed in .722 shall indicate how she intends to care for the family.

41-460 UNBORN CHILD

41-460

AFDC
MN

An unborn child is not eligible for an aid payment on the basis of parental deprivation. This by itself shall not preclude eligibility for benefits under the California Medical Assistance Program. *no linkage requirement*

DEPARTMENT OF PUBLIC SOCIAL SERVICES



ADMINISTRATIVE OFFICE

September 13, 1971

TO: District Directors
Division II

FROM: William E. Stevens, Division Chief
Division II *William E. Stevens*

SUBJECT: WELFARE REFORM ACT-RECIPIENTS LIVING OUT OF STATE/UNBORN ELIGIBLE CHILDREN

Recipients Living Out of State

The Welfare Reform Act of 1971 changes eligibility for recipients living out of state for one year. This has been reduced to 60 days.

To assess the impact on our caseload, the following statistical information is requested, and should be forwarded to my office by September 15, 1971.

1. The number of welfare recipients that have lived out of state 60 days or more by September 30, 1971. Please give the name, state number, and amount of grant in these instances.
2. The number of welfare recipients that will be absent from the state 60 days after October 1, 1971. Please give the name, state number, and amount of grant in these instances.

On those cases to be discontinued effective September 30, 1971, proceed to prepare all documentation per established procedures. You are requested, however, to forward these documents to the Administrative Deputy rather than to the Wheeler Montgomery control clerk. Further instructions will be subsequently provided for the final disposition of these documents.

You will note, that sample letters are included in the material that accompanies this memorandum. These letters must be mailed no later than 4:00 p.m. September 14, 1971 to meet the provisions of the Wheeler vs Montgomery court order.

Unborn Eligible Children

The Welfare Reform Act of 1971, also changes the eligibility status for an unborn child.

Effective September 30, 1971, the unborn will no longer be eligible for public assistance.

The implications of this regulation is multiplex.

Unborn Eligible Children

1. In those cases where eligibility for the family depends on the unborn, eligibility for that family group will terminate on September 30, 1971.
2. In those cases where there are other eligible children in addition to the unborn child, there will be a reduction in the grant for that family group.
3. In those cases in which aid is pending, aid is to be certified in September 1971, and will be discontinued effective September 30, 1971.

The following statistical information is required and is to be forwarded to my office by September 15, 1971.

1. The number of cases to be discontinued effective September 30, 1971.
2. The number of cases in which the grant will be reduced as a result of the deletion of an unborn.

On those cases to be discontinued effective September 30, 1971, proceed to prepare all documentation per established procedures.

Again, you are requested to forward these documents to the Administrative Deputy rather than to the Wheeler-Montgomery control clerk. Further instructions will be subsequently provided for the final disposition of these documents.

Samples letters included in this packet are to be mailed to all appropriate recipients advising them of the specific changes in their situation, and the action to be taken effective September 30, 1971.

It is highly important that these letters be mailed no later than 4:00 p.m. September 14, 1971 to meet the provisions of the Wheeler vs Montgomery court order.

WES/bjb

Attachments

COUNTY OF LOS ANGELES
DEPARTMENT OF PUBLIC SOCIAL SERVICES

ELLIS P. MURPHY
DIRECTOR



BUREAU OF FAMILY AND
CHILDREN'S SERVICES

ROBERT L. CHAFFEE
Director

ADDRESS REPLY TO:

We have just been advised by the State Department of Social Welfare that new regulations have been passed that affect your application/continued eligibility for public assistance.

As of October 1, 1971, California laws no longer permit public assistance under the Aid to Families with Dependent Children Program for your unborn child. This means that if you are receiving assistance only for yourself and your unborn child, all financial assistance will be ended. If you have other eligible children in your home, financial assistance will be discontinued for your unborn child but continued for yourself and the other eligible children.

You have the right to request a fair hearing before a State Referee if you believe your Aid to Families with Dependent Children grant will be reduced, withheld or discontinued as a result of this new regulation.

You can request a fair hearing by writing the State Department of Social Welfare, 744 P Street, Sacramento, 95814. Your request should include the reasons for your dissatisfaction. If your request for a fair hearing is received by the State within 15 days of this notice, you may be entitled to continue to receive assistance pending a State decision.

Very truly yours,

DISTRICT DIRECTOR

by _____
Eligibility Worker

9/15/71 Telegram from CDSW to County Welfare Directors

NO. WDS. - CL. OF SVC.	PD. OR COLL.	CASH NO.	CHARGE TO THE ACCOUNT OF	<input type="checkbox"/> OVER NIGHT TELEGRAM UNLESS BOX ABOVE IS CHECKED THIS MESSAGE WILL BE SENT AS A TELEGRAM
			STATE DEPT. OF SOCIAL WELFARE	
Send the following message, subject to the terms on back hereof, which are hereby agreed to				
TO				CARE OF OR APT. NO.
STREET & NO.				TELEPHONE
CITY & STATE				ZIP CODE
(WESTERN UNION: PLEASE SEND THE FOLLOWING MESSAGE TO THE ATTACHED LIST OF 58 COUNTY WELFARE DIRECTORS.)				
WELFARE REFORM ACT OF 1971, GUIDLINES FOR IMPLEMENTATION (SUPPLEMENT NO. 2)				
SECTION 39.01 OF THE WELFARE REFORM ACT 1971 (SB796 - BEILENSEN) CONTAINS A NEW CONCEPT FOR PROVIDING MEDICAL ASSISTANCE TO UNWED, PREGNANT MINORS. THIS CHANGES THE RATIONALE UNDERLYING THE CURRENT REGULATIONS PERTAINING TO THE FETUS. REGULATIONS IMPLEMENTING THIS SUBJECT HAVE NOT BEEN FINALIZED AND A DECISION HAS YET TO BE MADE ON THE EXACT CONTENTS. THEREFORE, THE PRESENT MANUAL POLICIES AS TO ELIGIBILITY AND FDU SHOULD BE CONTINUED, MODIFIED ONLY BY THE USE OF THE APPROPRIATE REVISED TABLES OF MAXIMUM AID PAYMENT AND BASIC MINIMUM NEED. ANY OTHER ACTION BY THE COUNTIES IN ANTICIPATION OF SUCH REGULATIONS WOULD BE PREMATURE AT THIS TIME AT SUCH TIME AS THE REGULATIONS ARE FINALIZED YOU WILL BE NOTIFIED THEREOF AND A				
(PG. 1 OF 2)				

NO. WDS. - CL. OF SVC.	PD. OR COLL.	CASH NO.	CHARGE TO THE ACCOUNT OF	<input type="checkbox"/> OVER NIGHT TELEGRAM UNLESS BOX ABOVE IS CHECKED THIS MESSAGE WILL BE SENT AS A TELEGRAM
Send the following message, subject to the terms on back hereof, which are hereby agreed to				
TO				CARE OF OR APT. NO.
STREET & NO.				TELEPHONE
CITY & STATE				ZIP CODE
FGP CONT.				
REASONABLE TIME FOR IMPLEMENTATION WILL BE ALLOWED.				
ROBERT B. CARLESON DIRECTOR OF SOCIAL WELFARE				
(PG. 2 OF 2)				

COUNTY OF LOS ANGELES
DEPARTMENT OF PUBLIC SOCIAL SERVICES

ELLIS P. MURPHY
DIRECTOR



BUREAU OF FAMILY AND
CHILDREN'S SERVICES

MARVIN FREEDMAN, ACSW,
Director September 16, 1971

ADDRESS REPLY TO:

Metropolitan District Family Services
2707 South Grand Avenue
Los Angeles, CA 90007

Dear _____ ..

Please disregard the letter you received regarding the discontinuance or denial of aid for your unborn child. You will continue to receive your grant if your aid has already been approved. If you have an application pending it will be processed and approved if you are eligible.

It is, therefore, not necessary for you to file for a Fair Hearing since your aid will not be interrupted.

Very truly yours,

JIMMY L. WALKER, DISTRICT DIRECTOR
METRO. DISTRICT, FAMILY SERVICES

By: _____
Eligibility Worker File #

JLW:MO:mc

CONTINUATION SHEET
FOR FILING ADMINISTRATIVE REGULATIONS
WITH THE SECRETARY OF STATE
(Pursuant to Government Code Section 11180.1)

SDSW Regulation
Sent to Counties
on 9/27/71

Never Filed

44-213 THE FAMILY BUDGET UNIT (Continued)

44-213

AFDC

.31 Children - all related eligible unmarried children, excluding the unborn child, for whom aid is requested by the child's parent or relative caretaker.

.32 Parent - the eligible child's natural or adoptive parent who requests aid on behalf of the child.

and

.33 Parent's spouse - the spouse of the eligible child's natural or adoptive parent when the basis for deprivation is the incapacity of a natural or adoptive parent, or the unemployment of the natural or adoptive father (who meets federal conditions in Section 42-340.3), living in the home, or if there is no parent living in the home.

.34 Relative - the needy adult relative, as defined above, other than a parent, who provides care and supervision of the eligible child.

.4 Other Needy Related Persons Living in the Home Who May Be Included As "Nonrecipients" in The Same Family Budget Unit With Eligible Children, Unless EXCLUDED By Section 44-213.5 for purposes of determining financial eligibility under Chapter 42-300.

.41 Upon the written request of the parent, or the caretaker if neither parent is living in the home, the following persons living in the home, if needy, shall be members of the Family Budget Unit and shall have their needs and income taken into consideration in determining the financial eligibility of the family.

DO NOT WRITE IN THIS SPACE

FOR FILING ADMINISTRATIVE REGULATIONS
WITH THE SECRETARY OF STATE
(Pursuant to Government Code Section 11120.1)

SDSW Regulation
Filed 10/5/71

44-213 THE FAMILY BUDGET UNIT (Continued)

44-213

AFDC

.31 Children - all related eligible unmarried children, including the unborn child, for whom aid is requested by the child's parent or relative caretaker.

.32 Parent - the eligible child's natural or adoptive parent who requests aid on behalf of the child.

and

.33 Parent's spouse - the spouse of the eligible child's natural or adoptive parent when the basis for deprivation is the incapacity of a natural or adoptive parent, or the unemployment of the natural or adoptive father (who meets federal conditions in Section 41-440.5), living in the home, or if there is no parent living in the home.

.34 Relative - the needy adult relative, as defined above, other than a parent, who provides care and supervision of the eligible child.

.4 Other Needy Related Persons Living in the Home Who May Be Included As "Nonrecipients" in The Same Family Budget Unit With Eligible Children, Unless EXCLUDED By Section 44-213.5 for purposes of determining financial eligibility under Chapter 42-300.

.41 Upon the written request of the parent, or the caretaker if neither parent is living in the home, the following persons living in the home, if needy, shall be members of the Family Budget Unit and shall have their needs and income taken into consideration in determining the financial eligibility of the family.

DO NOT WRITE IN THIS SPACE

Effective 10/1/71

Overpayments - Burden of Proof

CONTINUATION SHEET
FOR FILING ADMINISTRATIVE REGULATIONS
WITH THE SECRETARY OF STATE
(Pursuant to Government Code Section 11180.1)

SDSW Regulation
Filed 10/29/71

44-333 OVERPAYMENTS - GENERAL (Continued)

44-333

AB
ATD
OAS
AFDC

.132 For the recipient who failed to meet his responsibility for reporting, the maximum adjustment period is one year following the month of the discovery of the overpayment or one year following the date of the Fair Hearing decision on the propriety of the overpayment adjustment, if any.

.14 Knowledge

.141 A recipient is presumed to be informed as to the provisions for eligibility and his responsibility for reporting (see Sections 40-131.3 and 44-333.2) and reasonably to understand these provisions.

.142 A recipient is presumed to know of changes in his income, need, resources and other circumstances affecting his individual situation.

.15 Responsibility for Reporting Met

A recipient has met his responsibility for reporting when, within his competence, he has made a prompt accurate, full and complete disclosure of facts material to a correct determination of eligibility and grant.

DO NOT WRITE IN THIS SPACE

Effective 11/1/71

CONTINUATION SHEET
FOR FILING ADMINISTRATIVE REGULATIONS
WITH THE SECRETARY OF STATE

(Pursuant to Government Code Section 11380.1)

44-333 OVERPAYMENTS - GENERAL (Continued)

44-333

AB
ATD
OAS
AFDC.16 Responsibility for Reporting Not Met: Willfully Withheld Information

A recipient has failed to meet his responsibility for reporting if he has willfully failed to report pertinent facts or has employed any willfully fraudulent device in connection with eligibility or grant determination.

.161 Willful Failure to Report

Unless the recipient effectively rebuts the presumptions of Section 44-333.14 by clear and convincing evidence, his failure to report shall be considered willful, irrespective of the recipient's negligence, mistakes, misinterpretations, errors, or inadvertence.

.162 Willfully Fraudulent Device

A willfully fraudulent device consists of any misrepresentation oral or written, of facts material to a correct determination of eligibility and grant.

.17 Balancing

Balancing is the liquidation of all or a portion of an overpayment which is subject to adjustment or repayment by applying it against underpayment for which retroactive aid would otherwise be required.

Effective 11/1/71

DO NOT WRITE IN THIS SPACE