



Coalition of California Welfare Rights Organizations, Inc.  
1111 Howe Ave • Suite 635 • Sacramento • CA 95825-8551  
Telephone (916) 736-0616 • Fax (916) 736-2645

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## **CCWRO New Welfare News 2023-08**

# **CaSAWS UPDATE**

## **CaSAWS Bill SCERFRA Analysis Puzzling & Shabby**

The SAWS Cost Estimation Request For Research & Analysis shortened to SCERFRA is the method by which California Department of Social Services (CDSS) and Department of Health Care Services (DHCS) use to request information from CalSAWS relative to proposed bills and other computer changes. CalSAWS funded primarily by the state and federal government has to pay CalSAWS \$129 a hour to respond to these SCERFRA requests from DHCS and CDSS. Generally, these responses are simply estimates, for instance; it could take from “0 to 700 hours” to do automation. Or, it could cost from “\$100,000 to \$500,000” or, it could take “3 months to a year” to get it done. The SCERFRA does not explain how they arrived at these conclusions.

Below, we analyze 3 SCERFRAs; SCERFRA 23-509 relative to AB 274; SCERFRA 23-528 relative to AB 843; SCERFRA 23-509 relative to SB 774 and SCERFRA 22-542 relative to implementing the new CalFresh Benefits for all California resident immigrants.

**SCERFRA 23-509:** On 2-17-23, CDSS asked CalSAWS “Please provide any anticipated costs and implementation timeframes related to AB 274. As a background, prior to the enactment of AB 274 non-means tested grants, awards, scholarships, loans, or fellowship benefits were countable income in determining CalWORKs eligibility or grant amounts. AB 274 exempts all grants, awards, scholarships, loans, or fellowship

benefits provided to any assistance unit member for educational purposes from consideration as income for purposes of determining CalWORKs eligibility or grant amounts.

CalSAWS informed CDSS that it would cost \$161,000 and take 12 months for CalSAWS to tell county eligibility workers to exempt all grant, award, scholarship, loan, or fellowship benefits.

The SCERFRA 23-509 did not explain which current automation needs to be changed. CDSS failed to verify with CalSAWS that there was any change in automation to implement AB 274 that would take 12 months and cost \$161,000.

CDSS also paid CalSAWS for responding to SCERFRA 23-509 an estimated \$127/hr.

**SCERFRA 23-528:** On 3-23-23, CDSS asked CalSAWS to provide an estimated cost for implementing AB 843 which codifies the existing skimmed food stamp replacement process. CalSAWS informed CDSS that it would cost \$161,000 and take 12 months to program CalSAWS to tell county eligibility workers exempt all grant, award, scholarship, loan, or fellowship benefits.

CalSAWS informed CDSS that it estimates that it will take between 0 to 700 hours; up to \$100,000; and between 3 months

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to 1 year to perform the automation. The response failed to mention which automation is necessary to implement for a process that can be done without automation. CDSS paid CalSAWS for responding to SCERFRA 23-509 an estimated \$127/hr.

**SCERFRA 23-528:** On 3-24-23 CDSS asked CalSAWS to provide an estimated cost for implementing SB 773 that would provide for additional non-government assistance for homeless families to be exempt income.

CalSAWS issued two confusing responses. The first response is that it will cost \$429,000 for CalSAWS to:

1. No new interfaces to collect new income type from other system.
1. Updates to noticing will be required to provide new budgeting and description of the change to the Homeless Permanent Budget.
2. All updates to provided Notices in all Threshold Languages (Arabic, Armenian, Cambodian, Chinese, Farsi, Hmong, Korean, Lao, Russian, Spanish, Tagalog, Vietnamese, Hindi, Japanese, Mien, Portuguese, Punjabi, Thai, Ukrainian)
3. Applies to Homeless Permanent program only.
4. Issues no new reports. Any specified statewide data related to the provision of these homeless assistance benefit does not provide any reporting requirement, reporting changes added to this request will incur additional costs when they are determined.
5. No impact to fiscal, any new fiscal changes added to this request will incur additional costs when they are determined.

The second response said that CalSAWS for the cost of \$1,016,000 will do:

1. No new Interface to collect new Income type from other system.
2. Updates to noticing will be required to provide new budgeting and description of the change to the Homeless Permanent Budget.
3. All updates to noticing will be provided in all Threshold Languages (Arabic, Armenian, Cambodian, Chinese, Farsi, Hmong, Korean, Lao,

Russian, Spanish, Tagalog, Vietnamese, Hindi, Japanese, Mien, Portuguese, Punjabi, Thai, Ukrainian)

4. Applies to Homeless Permanent program only.

It appears that CalSAWS charges more for doing less. CDSS also paid CalSAWS for responding to SCERFRA 23-509 an estimated \$127/hr.

**SCERFRA 22-542:** On 3-27-23 CDSS asked CalSAWS to provide an estimated cost for implementing AB 135 California Food Assistance Program (CFAP). CFAP provides state funded CalFresh benefits to all aged, blind and disabled immigrant California residents. The current CFAP program only provides aid to certain aged, blind or disabled immigrants. AB 135 simplifies the program so that food assistance county workers will not have to determine if the applicant meets a certain immigrant status. The implementation is simple – no more determination of immigrant status.

On 4-12-23 CalSAWS informed CDSS that it would cost \$1,696,250 and it would take 12 months to program CalSAWS to tell county eligibility workers that CFAP eligibility no longer depends on immigration status.

CDSS paid CalSAWS for responding to SCERFRA 23-509 an estimated \$127/hr.

What all this makes clear is CalSAWS is not being asked by CDSS to justify its time and cost estimates for simple changes to the program that often don't need any automation. CalSAWS is not an island to itself. It is funded by CDSS and should have to face oversight and questioning like any other entity. It is dangerous to allow unquestioned and unchallenged time and cost estimates by CalSAWS to delay much needed assistance to California public benefit recipients.

Often legislation implementation that can be implemented without automation is delayed to funnel money to CalSAWS to do automation that is not necessary.

## All CALSAWS Opt In/Out Features Should be Mandatory to Counties

CalSAWs has several features designed to improve service for applicants and recipients, however, these features are opt in/out for counties. Counties can decide without any need for explanation to use these free tools that can only benefit applicants and recipients. There is no public hearing, no public input from the county board of supervisors to know that their constituents are being underserved and county welfare offices are refusing to avail 21<sup>st</sup> century technology to help Californians access the benefits that they are entitled to or can qualify for.

The following features are free and available to every county in the state. See [Opt in/out Features Available to Counties](#) (below):

- GA/GR program to apply for benefits;
- Interview Nudge (after submission of an application);
- VITA appointment request;
- Click to Chat;
- Call Me Back (web form, where users enter their contact details for county staff to call them back);
- EBT/BIC Card replacement;
- Two-way messaging;
- Domestic Violence Survivor Access (allow people with a confidentiality flag to automatically access case

Tehama, Trinity, Yolo and Yuba counties have decided on their own, with no requirement to explain their decision to any other body, that residents of their counties do not get to apply for GA/GR easily on-line. The features that would assist county residents in quick and effective communication with counties, such as; Interview Nudge, Two Way Messaging, Click to Chat and Call Me are being spottily adopted, with only Two Way Messaging being widely used. 30 counties have decided even this basic, free communication tool is not something their residents, who often wait on hold

for hours, and are lucky if the call doesn't drop, could use.

Since these no-cost features would increase connectivity and efficiency in the application and case management system, the reasonable conclusion is that counties don't want more connectivity and efficiency in the application and case management system.

But, we do not know why counties aren't opting in on these features because the public and even advocates are more or less shut out of this process. The decision to opt in/out is left to each individual county, CDSS has no say and can't answer advocates questions or demands. Unless advocates have an open line of communication with an individual county there is no one who can answer the question 'why didn't my county opt in?'

These are examples of counties being free to choose to help applicants and recipients, at no cost to them, and these counties are denying that help to applicants and recipients, with no need to explain their decision to anyone. We believe CDSS should take control of this program they paid for and manage the county welfare departments they are tasked with overseeing. CDSS should mandate counties opt in to all features in CalSAWs. This seems like an issue that could be resolved with something as simple as an ACL or ACWDL stating counties must opt in to all features offered in CalSAWs.

**TABLE # 1** below, shows the various available options and which county has refused to turn on a CalSAWS feature that would be beneficial to applicants and beneficiaries of public social services in California.

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CalSaws Opt In/Out (Con't from page 3)

**TABLE # 1 - Opt in/out Features Available to Counties**  
**(X indicates the feature is turned on for the county)**

Counties	Request Interview Nudge	Accept GA/GR Applications	EBT/Medi-Cal Card Replacement	Two-Way Messaging	Click to Chat	Call Me Feature
Alameda	Waive 5 – CalSAWS Coming Soon					
Alpine			X			
Amador		X	X	X		
Butte		X	X	X		
Calaveras		X	X	X		
Colusa			X			
Contra Costa		X	X			
Del Norte		X	X	X		
El Dorado			X	X		
Fresno	Waive 5 or 6 – CalSAWS Coming Soon					
Glenn		X	X	X		
Humboldt		X	X			
Imperial			X	X		
Inyo		X	X			
Kern		X	X			
Kings			X			
Lake		X	X	X		
Lassen		X	X			
Los Angeles	X	X	X			
Madera		X	X	X		
Marin		X	X	X	X	
Mariposa		X	X	X		
Mendocino		X	X			
Merced			X	X		
Modoc		X	X	X		
Mono		X	X			
Monterey		X	X		X	
Napa	X	X	X	X		
Nevada		X	X			
Orange	X	X	X			X
Placer		X	X			
Plumas		X	X			
Riverside	X	X	X			
Sacramento	Waive 5 or 6 – CalSAWS Coming Soon					

San Benito			X	X		
San Bernardino			X		X	X
San Diego		X	X			
San Francisco	Waive 5 or 6 – CalSAWS Coming Soon					
San Joaquin			X			
San Luis Obispo	Waive 5 or 6 – CalSAWS Coming Soon					
San Mateo	X	X	X			
Santa Barbara		X	X	X		
Santa Clara		X	X	X		X
Santa Cruz		X	X			X
Shasta			X			
Sierra			X	X		
Siskiyou		X	X	X		
Solano			X			
Sonoma	Waive 5 or 6 – CalSAWS Coming Soon					
Stanislaus			X	X		
Sutter			X			
Tehama			X			
Trinity			X			
Tulare	X					
Tuolumne	X	X	X	X		
Ventura	X	X	X			
Yolo						
Yuba			X		X	

## SSI BENEFIT LEVELS FAIL THEIR PURPOSE

While much has been said, written and publicly lamented about the increased presence of the homeless in California cities, few real resources have been devoted to pragmatic solutions that could work quickly to address a key cause of homelessness -- housing affordability.

A simple and immediately effective way to ease the housing crisis would be to raise SSI payments to match the current cost of living. The federal Social Security Supplemental Security Income (Title XVI) program known as SSI, provides modest

monthly income to the elderly and disabled including disabled children and youth who did not participate in the workforce. The current SSI levels for 2023 IS \$1,134 for an individual and \$1,928 for a couple. There are slightly higher levels of payment for individuals who are blind.

However, these benefit levels are so low that individuals whose only income is SSI are well below federal poverty levels. Resource and asset limits are the amounts that an individual or household is allowed in savings, bank accounts and

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other liquid resources. For many low income households their resources are used to cover tough budget months, pay for unexpected costs such as a spike in utility costs or for emergency situations where a family or individual needs to relocate or face unreimbursed medical costs. The current level of resource assets is so low that an individual or household would not be able to replace lost or damaged housing.

The chart below shows the current SSI levels for benefits compared to what their value would be today adjusted for inflation. An example of how extreme the changes are is illustrated by this: the \$1000 difference between the 1972 resource limit for an individual and two person SSI eligible household, is in 2023 dollars a difference of \$2,465. According to a July 2023 report by the Center on Budget Priorities Congress increased the resource limits for SSI recipients by statutory change between 1985 and 1989. However there have been no increases since that time. See an article by Center on Budget Policy & Priorities entitled [“The Case for Updated Asset Limits.”](#)

	SSI Benefit Levels (since 1989)	SSI Benefit Levels in 2023 dollars	SSI Resource Limits (since 1989)	Resource Limit in 2023 dollars
Single Person	\$ 914	\$2,218.72	\$2,000.00	\$4930
Couple	\$1,371	\$3,379.86	\$3,000.00	\$7395

These calculations were done using the on-line CPI calculator that itself uses data from the U.S. Dept. of Labor. See <https://www.in2013dollars.com>

Other approaches that may help to address housing affordable for our poorest neighbors include an effort to remove the harsh and regressive rule that requires an SSI payment be reduced by the regular receipt of donations of food from friends and rela-

tives. This change, supported by the Urban Institute would ... ”mean bigger payments for some of the nearly 800,000 people whose SSI benefits are reduced by as much as a third because they get help from friends or relatives to pay for basic needs. It would also simplify a particularly onerous element of SSI administration that requires Social Security workers to spend time and resources delving into millions of current and potential beneficiaries’ living arrangements.”

“When you consider that the [SSI] benefit itself is below the poverty level, applying a one-third reduction on it because of ISM is a hardship for the beneficiaries,” says Jack Smalligan, a senior policy fellow at the Urban Institute’s Income and Benefits Policy Center. “And it’s also very expensive for SSA to administer this.” See [“Social Security Considers Change in SSI Income Rules”](#)

California, may for example, consider adding a utility allowance or unmet housing need payment that would supplement the existing California SSI State Supplement payment. These are possible changes that would effectively address the gap between the purchasing power of SSI benefits paid on a formula created in the mid-1970’s and current housing costs even for the least expensive (and often lowest quality) of housing.- *Daphne Macklin, CCWRO-daphne.macklin@ccwro.org*