



COMMUNITY HEALTH INITIATIVE OF ORANGE COUNTY



WESTERN CENTER ON LAW & POVERTY



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Date: August 26, 2021

Re: Readiness of BenefitsCal, the new online public benefits web portal.

Dear Partners,

With fewer than 40 days until the launch of the BenefitsCal Portal, the public benefits advocate and application assister community are sending this letter to communicate priority issues that must be addressed before the Portal's launch. As part of our commitment to the success of the BenefitsCal portal, we are sharing our concerns as an opportunity to ensure the launch of BenefitsCal will be able to aid low-income people as they seek benefits and services, and frontline workers who often support them.

We are grateful to the stakeholders, including CalSAWS, CDSS, DHCS, OSI, Deloitte, CWDA, county staff, and the local county advocates who have been working to create increased transparency in this process, prioritize the needs of consumers and frontline workers, and develop technology that can ensure low-income Californians have access to the resources and services they need.

Project Status

The BenefitsCal portal is expected to "go-live" on Monday, September 27, along with the C-IV County migration to CalSAWS.

In recent months, transparency has included:

- Since April, regular meetings with the Deloitte team that has been working to develop the BenefitsCal website.
- The "Enhancements List" which is the summary of functionality that has been identified in User Centered Design by consumers, advocates, and assisters, but is not currently planned for the BenefitsCal website.
- Receiving our testing scenario suggestions (we are awaiting the outcomes for User Acceptance Testing).
- A partial demonstration of the BenefitsCal website, which included aspects of the dashboard for assisters and segments of the application for consumers.
- A spreadsheet that lists the text that is included in the website.
- The opportunity for limited access to a test website, "Loop11," to see the "apply for benefits flow."

Even with just this partial information, we identified several deficiencies that account for one or more of the following:

- Lack of alignment with federal and state law and policy;
- Information flow or technology barriers for consumers; and/or
- Language or questions that contribute to misinformation and stigma about accessing programs.

We have attached an appendix with details about these concerns, although it remains incomplete because we have not yet been granted access to test the full BenefitsCal website portal.

Our Goal

We want to make something very clear: Advocates and assisters want to see BenefitsCal succeed, and we think it can if we work together. We are defining success in terms of not just how BenefitsCal aligns with the law, but also how it is implemented in a way that allows consumers to uphold the law because they understand the questions, and the flow of information makes sense in practice.

We are thinking relationally, not transactionally. A relational approach means a successful website that will empower consumers so they can comply with the law and complete the process. A "transactional" website may ask all the "right" questions but may also create confusion, fear, and contribute to barriers; it may put people in harm's way legally, and they will be guilty without knowing they are doing something wrong.

Partnership in this process should be based on collaborative approaches, proactive communication, respectful problem-solving, and generative conversations that work to eliminate fear and suspicion and instead build on trust and appreciation for the value we all bring to the process in order to reach shared goals for success.

The Context of the Need

County welfare departments are working hard to meet the needs of low-income Californians, but they are facing a confluence of events that make it even more critical that the Portal is compliant with state law and will be easy to navigate:

Federal unemployment insurance benefits will end on September 4, and it is likely that more people will be applying for other benefits after that date. Welfare departments are going to be inundated with new applications for CalWORKs and CalFresh, and with mid period change requests because of the end of the COVID unemployment insurance programs starting the first week in September. Launching a new website during this time of increased need carries a great deal of risk.

The eviction moratorium is set to expire at the end of September for most California counties, which will likely increase homelessness and the need for public benefits; due to extensive delays and confusion around the rental assistance program, many tenants have continued and will continue to lose their housing because they are too afraid to stay after receiving a notice, or their landlord pressures them into leaving because of unpaid rent.

California faces a crisis where one in three low-income immigrants does not utilize public benefits because of fear. A website that is not language accessible (ie, people may be able to read the questions in their language but cannot submit responses in their own language), and, further, which forces undocumented parents to input immigration-related information, striking at the heart of their fear, will exacerbate existing barriers.

In addition, many offices remain closed to the public or have limited in-person services. We have heard reports of extensive wait times that are over an hour, and in some instances as long as five hours. Many call centers drop calls before the caller is ever connected.

Based on available CalFresh data, online applications account for as much as 70% of the overall applications submitted (per the available data from the CF296). In just the first quarter of 2021, Medi-Cal data indicates that over 275,000 people applied for Medi-Cal online. And when the public health emergency ends in early 2022, millions of Medi-Cal beneficiaries will need to submit their renewals online.

The use of the existing online application services continue to be a primary way that the vast majority of consumers access services, which is why it is so important that the state launches the BenefitsCal website in a lawful and seamless manner.

Some assisters have already shared that they do not plan to use BenefitsCal when it launches because it will not have the features they need and they do not have confidence that it will be a positive experience for consumers. We continue to hear from assisters that they will stick with alternatives that have already proven they can meet the needs of assisters and consumers.

Our Requests

Our experience so far is that we've been given limited and incomplete information about how the BenefitsCal website is set up and how it will function. The limited information does not appear to be in alignment with Welf. & Inst. Code section 10823.1(c) that states the SAWS Consortia "shall engage with stakeholders to discuss current and planned functionality changes, system demonstrations of public portals and mobile applications, and advocates' identification of areas of concern, especially with the design of public-facing elements and other areas that directly impact clients."

We would like to partner with your team in an orderly way with a full picture of the consumer experience. Advocates and assisters have historically been very involved in similar system changes and policy implementation such as Covered California (CalHEERS user testing) and Healthy Families. The BenefitsCal development has not had that same level of advocate and assister involvement. But it is not too late! Providing us the opportunity to review the actual screenshots and/or a sandbox testing environment (as done with CalHEERS changes) will help.

Based on what has been shared with public assistance advocates and application assisters as of this date, we are requesting:

1. Stakeholders have the opportunity to review and provide rapid feedback on the entirety of the BenefitsCal Portal (ie, the actual screens via comprehensive screenshots or credentials for a subset of advocates to navigate a full test site);

2. Functionality (and if needed, workarounds) necessary for consumers and assisters are added before launch to remedy violations of federal and state laws, and state policy;
3. Confirmation that within the current timeline key functions that exist today in C4Yourself will work in BenefitsCal, and that consumers will have a similar or better experience in BenefitsCal;
4. Evidence that BenefitsCal will be able to seamlessly handle the load and volume at launch without glitches, loss of data, or deadends;
5. Access to a demo site for the assister community with sufficient time for review in advance of the launch. We appreciate the advanced training materials, but a demo site is necessary to make sure they can be properly trained on the system.
6. A series of sessions where population and policy experts can collaboratively partner with BenefitsCal tool designers to move through how the application flow is set up for various population types such as immigrants, students, families, etc.

Final Comments

As CalSAWS Project moves towards their final “green light” meetings before go live, we urge consideration of the impact to consumers - both in the short- and long-term - when deliberating on BenefitsCal readiness.

Sending consumers to a website that does not align with policy or meet a minimum standard of functionality and accessibility will inevitably lead to people not seeing the website as a resource for them and exacerbate existing myths and stigmas. For example, incorrectly telling an applicant that they must provide proof of U.S. citizenship in order to apply for benefits will have lasting effects on our immigrant communities, deterring many from applying. Advocates currently have reports from people who already find it burdensome and confusing to apply for public benefits, and we want to ensure that BenefitsCal alleviates these concerns.

We encourage CalSAWS to prioritize a roll out that will be effective and generate trust in BenefitsCal that will have users encouraging their communities to use our new platform, rather than a rollout that generates confusion and loses the trust of users which will have the community actively speaking negatively of our new platform.

We believe in BenefitsCal, we believe we can make it the best platform that our state has ever had, and we believe we can do this together by working in partnership towards our shared goals.

Making necessary changes could delay the launch of the portal, and therefore lead to delay in other aspects of the migration. We understand this is a serious change to consider. However, the long-term impacts of the consumer experience in the new BenefitsCal portal should be paramount and take precedence over meeting timeline goals.

Your response within 10 days is requested regarding our requests 1 through 6 above, and to discuss how the Portal will be launched in compliance with state law and regarding the priorities that advocates have identified.

The Appendix lists violations of state or federal law, and additional concerns about technology, information flow, and functionality. Additional concerns have been sent directly to Deloitte for review.

In partnership,

Bet Tzedek Legal Services
California Association of Food Banks
California Coalition of Welfare Rights Organizations
Center for Healthy Communities, CA Higher Ed & Far North Contract
Community Health Councils
Community Health Initiative of Orange County
Disability Rights California
Legal Services of Northern California
Maternal and Child Health Access
National Health Law Program
Neighborhood Legal Services of Los Angeles
NourishCalifornia
Public Interest Law Project
Redwood Coast Medical Services
San Francisco-Marin Food Bank
Western Center on Law and Poverty

APPENDIX

Policy violations in BenefitsCal as identified by advocates in the limited review of the test website:

1. From the very first pre-application page (“Ready to do this? Here's how it works.”) the language incorrectly describes immigration requirements, potentially deterring applicants before they even start. It says “Lawful immigration status ONLY for legal noncitizens applying for benefits (an Alien Registration Card, visa)” without mentioning immigrants without status can qualify and/or proceed on behalf of other household members, and can be eligible for some Medi-Cal services.
2. The demo site forces the primary applicant (person filling out the application) to select at least one benefit they are applying for. It does not give the option to say that the applicant is not applying for themselves, but for other family members (minor children for example). It then forces the primary applicant to submit immigration information, such as requiring that they put the date when they entered the country. For an undocumented parent applying on their children’s behalf, BenefitsCal must permit the applicant to apply only for them and not submit any immigration information for themselves. There are many other questions and concerns about the immigration section that could negatively impact consumers. For example, it forces people to enter a reason for not having an SSN, which could dissuade U/V/T applicants from submitting an application.
3. The application asks that immigrants submit their “date of entry” to the US in order to apply for CalFresh? “Date of Entry” is a term of art and may not indicate “the date that someone set foot in the USA.” Please provide the citation for this question being required and work with advocates to improve the language if it must be included in the online application.
4. The page after entering your “date of entry” is “Are you of Hispanic, Latino, or Spanish origin?” This strikes me as the wrong place to ask it. For example, I entered no lawful status, and then the very next page the application is asking me if I’m Latino, yikes!
5. For a Medi-Cal application when I select no immigration status, it takes me to “Do you have at least 10 years (40 quarters) of work history?” This is not a relevant or required data point for Medi-Cal eligibility.
6. The document upload page for a CalFresh application has upload buttons with specific document types, rather than the thing to be verified. For example, the verification for “Identity” actually says “Photo ID/Social Security Card.” We believe this is in violation of ACIN 1-45-11 “Counties cannot limit verification to any single type of document if multiple sources are available. [ACIN 1-45-11.]” Asking for a social security card is only allowable “if questionable” and doing so in the document upload section contributes to long-standing stigmas and barriers.
7. Per ACL 20-48 county staff must use e-verifications before requesting verifications from consumers (I wonder if we could work together to create something that will support consumers to upload documents timely without adding requirements unnecessarily and outside of policy?). In addition, the document upload page does not have an “other” category and thus improperly limits the documents that can be uploaded.
8. In the Help Center regarding verifications it says “acceptable documents for verification.” It's not made clear that consumers can get help from the county to get verifications. “Photo ID and Social Security Card” are again listed instead of “Identity.” I could not find information about collateral contacts anywhere in the section (perhaps it is elsewhere?), particularly for identity.

9. Document upload page prompts applicants who selected no lawful immigration status to upload "Citizenship Verification/Birth Certificate." Such documentation is not required. See, e.g., ACWDL 21-13.
10. School verification for the college student was requested in my example case on Loop11, even though the student had a child under the age of 6. Further, it's my understanding that college students simply need to acknowledge their exemption, not submit proof of it (unless questionable) per ACL 21-58 "With the release of this letter, California elects to not require verification of exemptions from the student eligibility rule unless questionable or in cases where a student's physical or mental unfitness is not evident to the CWD"
11. The document upload page asks for immunization records for a CalFresh only application. We do not see where immunizations are required for CalFresh.
12. Multiple advocates were not able to enter any information about medical expenses for a disabled household member. ("Tell us about the medical costs for your household. Select all that apply" but was only one option was given: "None of these apply.")
13. For a CalFresh only application it asks for "items of value that have been sold or given away in the last 30 months (2.5 years)" but the policy says 3 months (7 C.F.R. § 273.8(h)(1); MPP § 63-501.61). It also appears to ask for resources for all households, when resources are only needed for certain households depending on where their income falls on the 200% FPL limit (ACL 13-32).
14. When I listed work study or student grants as one time monies, it added it to my monthly income.- so my monthly income was way off. Work Study does not count as income.
15. It appears that when asking for SSN for a child, it does not provide the option of saying "the child is less than 1 year old" as it does in the SAWS2+, which is a Medi-Cal rule. For CalFresh, a child does not need to provide an SSN for 6 months.
16. For Medi-Cal application "Do you have a Social Security number?" page text says "A Social Security number is optional for household members who aren't applying for benefits." For Medi-Cal a SSN is optional under several eligibility categories when you do not have one to report. It's only required for people who are U.S. citizens. This is important to clarify up front so that everybody else knows they can still apply without an SSN.
17. "Medi-Cal Details" and "Who is eligible for Medi-Cal?" do not clearly describe the program as being available to all Californians that meet the requirements. The long list makes it seem like people need to fit into narrow (pre-Affordable Care Act) categories. Instead, please adopt language similar to the Covered California descriptions of Medi-Cal here: <https://www.coveredca.com/health/medi-cal/>
18. For the Medi-Cal application, when asking to appoint an authorized representative, selecting "no" not a navigator, and "no" did not apply through Covered California, it takes me to a page that asks "What's your contact information?" So it's a dead end and I am unable to appoint an AR. DHCS ACWDL 18-26E requires accepting AR appointments online.
19. For a Medi-Cal application when I add another household member who is not applying for benefits, it runs through the entire question flow (contact info, name, DOB, immigration status, race/SOGI, and even asks "Are Marta's shots up to date?" Medi-Cal doesn't ask about immunizations, and all of this info. is not required for non-aided household members. Application should especially NOT be asking about immigration status for a non-aided household member!
20. For a Medi-Cal application, the page asks "Is anyone on strike?" This is not relevant to Medi-Cal eligibility.
21. For Medi-Cal application, "Document Upload" requests ID docs for non-aided household members. This is not required.

22. Develop a plan and timeline to add functionality to allow people to submit their application responses in their own languages, in alignment with the threshold languages. (At this time, people can read the questions in some threshold languages but they cannot submit their responses in their own language if it doesn't use an English/Latin-based alphabet.)
23. The section on "lives in a facility, shelter, or other living arrangement" is very flawed. For example, subsidized housing is not a facility or shelter; those should be listed separately.
24. Subsidized housing also has a mandator field for "expected date of release." This is often unknown but that option is not available.
25. Why does it ask if someone needs to keep working to pay for medical expenses?
26. Multiple issues with the self-employed section asking for things like the business name, etc. It's not made clear that this information is option, or that it may not be relevant. Advocates are available to help provide detailed feedback on this section.
27. "Monthly average" for business costs suggests adding up annual costs and dividing by 12. This is not a valid way to determine self-employment expenses for CalWORKS and CalFresh.
28. In the section on earned income, it asks for the gross income. We entered a monthly amount (\$350) with an average of 10 hours per week. It appears the website recalculated the gross income to be \$758.45. It's not clear why that happened but this must be corrected.
29. "What will be [applicants] total income this year?" - income is not averaged annually for CalWORKS and CalFresh. If this is Medi-Cal only that needs to be made clear. Fluctuating income for CalWORKS and CalFresh is based on what is reasonably anticipated, not annual averaging or projection.

Technology and information flow issues (which may or may not be violations of policy, but could be barriers for consumers):

1. For a Medi-Cal application, the page says "Let's learn more about the health coverage for your household." Who does this apply to? Just the applicant, non-aided household members, etc.?
2. For a Medi-Cal application, after adding another household member not applying, I noticed an error I wanted to correct in my application. I clicked a link hoping to fix just the DOB, but it took me back to the very beginning of the application and I had to click through the entire application again to proceed. Then it took me to "Application Summary" where it was unclear how I should continue the application. It did not say I had completed "People" - which I had already done by adding a non-aided household member.
3. For a Medi-Cal application, where I get to "Can you share a little more about [applicant's] business?" - it's not clear this is where I should input my Uber income. Uber's not my business. It's just my gig job. Also when I put "rideshare" into "Business Type" it gives me this incorrect error: "Please make sure the Business Type includes numbers and letters only." I had to leave it blank to proceed.
4. "Program Description" for Medi-Cal is inaccurate ("Medi-Cal is free or low-cost health insurance for individuals or families. It includes help paying for private health care, such as premium assistance via a federal tax credit.") That second sentence is Covered California, not Medi-Cal.
5. The Medi-Cal application page "Would [applicant] like to use income data, such as information from tax returns, to make it easier to determine eligibility for paying for health

coverage in future years?” does not accurately or clearly describe why an applicant should select “yes.” Plus, it has a typo. It says: “By clicking yes, you agree to allow us to use income data, including from tax returns, [to] decide if you are eligible to renew.” Renew what? What’s renew? Consider using language similar to this from the SSApp instead, since it incentivizes selecting “yes” - “Renewal of insurance: To make it easier to continue to get health insurance in future years, I agree to allow Covered California to use computer sources, such as the IRS, to check my income. If the sources show I am still eligible, my insurance coverage can be renewed for another 12 months and I won’t have to fill out a renewal form or send other paperwork. I understand that if I choose not to allow Covered California to use computer sources, I must complete a renewal packet every 12 months in order to continue my health insurance. I agree to allow Covered California or the Medi-Cal program to check my information for: ...”

6. The language around requiring SSN is not appropriate. There are people applying for benefits who do not have an SSN (T, U, V-visa applicants).
7. In the document examples, why does it say they can provide a diploma to prove they are students -- wouldn't that show they are not students anymore?
8. When I entered the “other” person in my household, I indicated that she was not also applying for CalFresh benefits, though the system still asked me things like “Is Janet up to date on her shots?” This was confusing,
9. It could just be me but I had a very hard time using my phone to upload documents, the system did not give me the option to just take a picture from my phone (again it could be a user error, I am not very technically savvy) though there are also plenty of other folks who are also not technically savvy who might have a hard time uploading documents.
10. In the expenses section, I found it confusing to be asked whether I wanted to “apply for a special need payment for housing or essential household items lost or damaged due to sudden and/or unusual circumstances.” There must be a simpler way to ask, and it seems out of place in this section.
11. On the review of expenses, it includes items (\$0) that I wasn’t asked about (health insurance, tax-deductible) which was confusing.
12. The “Do I Qualify” chatbot doesn’t seem to take mixed-immigration status households into account.
13. I chose to have an Authorized Representative but wasn’t prompted to upload their identification.
14. Need to add to the document upload section an “other” button. There must be an option to submit documents that are not expressly listed.
15. Question about number of years to go back on tax return -- must have more explanation -- this a choice by the applicant when applying for MAGI Medi-Cal and client needs to understand how to maximize their eligibility.
16. All expense questions -- asking if someone outside the home assists. This is both irrelevant and covered by the in kind income questions. Already made comments on those that can only consider complete items of need paid in kind and not contributions to partial items of need.
17. For several questions need to clarify that they are for particular programs -- examples 3 months retroactive medical bills is Medi-Cal to get back bills covered, special needs expenses is CalWORKs, does anyone pay court ordered child support is CalFresh, tax deductions is Medi-Cal
18. Missing important screening questions -- need questions for CalFresh Medical Expense deduction, and need for CalFresh is any money intercepted for a court judgment before receiving it -- that does not count for CalFresh (and is separate from the child support question).

19. Cars - need to specify for which program and change questions accordingly -- same questions for all programs does not work. For CalWORKs, skip is cars own are worth less than \$25,000 total, for CalFresh cars are irrelevant at least for most people, first car is exempt for Medi-Cal.
20. Screens on Medi-Cal transfer of assets are missing -- it jumped from "do you have assets" to "listing assets currently have." Nothing on transfer of assets, or exceptions to that.
21. Utility costs showed up as "housing costs" which may be confusing for some people.
22. The Assister dashboard was developed without an integrated "Release of Information" process, which would allow consumers to give an assister permission to view information about their case. This step is a vital part of the assistance relationship that happens when people seek out support in their communities because it allows an assister to ensure that people make it through the application process and maintain their benefits.
23. Limited data access (primarily due to the lack of an integrated "Release of Information ") makes it extremely cumbersome, if not impossible, for assisters to get the data they are required to track as part of the state and federally funded outreach contracts.
24. The existing "Referral URL" used by college campus assisters is not currently available in BenefitsCal
25. Assistors are unable to access information for or upload documents on behalf of consumers who applied without assister support
26. Lack of remote e-signature options for assisters supporting consumers to apply remotely. This functionality is very important to have available during the COVID-19 public health crisis.
- 27.
28. Application does not advance when the address field includes common notations, such as "1455 1/2 N. Serrano Street" or even "1455 N. Serrano Street." Error message displays: "Please make sure to remove special characters (ex: !@#%\$%^&*)."
29. Application does not advance when name entries include common Spanish-language names and characters, such as "García" and "Nuñez." Error message displays: "Please make sure to remove special characters (ex: !@#%\$%^&*)."
30. Generally, the experience in Loop11 has been very glitchy -- we get kicked out of sections, can't return to sections after clicking into the linked "help" section, entered data deletes and the page reloads when clicking a drop down for more information, couldn't change a date of birth, entered a date of birth and then it did not retaining that information, among other issues.
31. When I select needing help because of a disability and hard of hearing, and click the link to contact a county office, and then search for Kern County zip 93306, I get an error and no results: "Sorry, we're not able to get details of local offices right now. Please try again later."
32. When selecting benefits to apply for, Medi-Cal description is generally good but fix typo: "Medi-Cal provides health coverage for adults, children and families. Depending on your income and family size, you may be eligible for free or low-cost health coverage."
33. When I click the arrow to expand some text boxes, the webpage automatically scrolls to the top so I cannot view the expanded text. Other times, I have to click the arrow twice for the expanded text to actually appear.
34. "Below are the people whose yearly income changes that you added." page did not display any applicant name/info, so it seemed like the portal did not register all of the income information changes I added.
35. The "Do I Qualify" icon located in the lower left corner of every screen is a hassle to work around (get in the way when you are trying to hit the next button),

36. The screen where you enter a birthdate is very clunky to use, and if you do not enter the information in a particular order it defaults to the current date (and then you get the message that you are not eligible due to age). Overall the birthdate entry field needs work.
37. When I add that I have another person living in my home, it does not give me the option to select roommate (which could be confusing to a student),
38. I did respond that I was a student, enrolled half time, though it did not take me any place to get additional information about what that means for my application,
39. In immigration section says SAVE system is only used for CalFresh. That is wrong - it is used for CalWORKs too
40. When I tried to back up through the application I first was sent to a screen about submitting redetermination, and then I was kicked out of the application and locked out of logging in again.
41. I was kicked out for being idle for some period of time without warning. That should not happen at all, but if it must be included, there needs to be a notice saying how long idle until kicked out and a warning before it happens. It seems when that happens nothing is saved so people can lose their entire application this way.
42. Boxes for CAPI, and for other services go nowhere.
43. The CalWORKs definition of a "household" says anyone "you're related to and who live in the same home." But the only mandatory people to include are people in the same home who are "parents, siblings and eligible half-siblings or step-siblings." Anyone else in the same household is irrelevant.
44. "United States" appears to be missing for the "place of birth" drop down menu.
45. The system appeared to change the relationship in the household from "child" to "parent" in the summary.
46. There is no legal basis to ask if someone gets food from somewhere other than at home (does this mean at the grocery store? A restaurant? A food bank?).
30. Gross Monthly Income calculator needs to be checked to confirm that it is calculating correctly
47. Why does it ask on a public assistance application if people are already receiving public assistance?
48. "Cash bonus or penalty from the Cal-Learn Program: Aid for help with childcare, rides, or other services" None of this counts as income; further it would be available in CalSAWS. Why is it necessary to ask people about this?
49. "Cash diversion payment or non-cash services: A one-time payment to address an immediate need, like a car repair, so that people who are employed can remain off of benefits." Need to include timeframe for diversion. It is only relevant if got diversion in the last six months. It is not income, but if received in I think the last six months it can impact CalWORKs but nothing else.
50. Add "Underemployment" to the screen about "do any of these apply to one or both of (name) parents"?
51. Regarding in-kind income definition: Needs to be clear – *all* of rent, utilities etc. Only counts as in kind if it is for a complete item of need. Partial payments does not count as in kind. This needs to be fixed on this screen and all subsequent in kind income screens.
52. What will income be next year? There is no way to predict this and the question should be removed.