STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY

DEPARTMENT OF SOCIAL SERVICES
744 P Street, Sacramento, CA 95814
August 11, 1986

ALL COUNTY LETTER NO. 86-75

TO: ALL COUNTY WELFARE DIRECTORS

SUBJECT: IMPLEMENTATION OF COUNTY STANDARDS FOR AFDC NOTICES OF ACTION (NOAs)

REFERENCE: ALL COUNTY WELFARE DIRECTOR'S LETTER, JUNE 11, 1986 AND ACL 86-57, JUNE 30, 1986

Attached is a copy of the county standards for preparing AFDC Notices of Action (NOAs), stuffer messages, informing notices, etc. These county NOA standards were developed in partial response to the requirements in the Turner v. McMahon consent decree. These standards were previously issued to you as part of the Turner Implementation Plan attached to All County Welfare Director's Letter of June 1, 1986 and ACL 86-57 of June 30, 1986. The purpose of this letter is to formally transmit the standards to you and provide additional information.

Implementation

The standards have been approved for use by the court and are mandated effective the following dates:

1) "Immediate" standards to be implemented by all counties for all NOAs on or before May 1, 1987; and

2) "Long Term" standards to be implemented at the same time as the two column format and no later than January 1, 1992.

Please note: the "long term" standards will be implemented on May 1, 1987 for manually prepared NOAs and no later than January 1, 1992 for NOAs prepared with automated equipment. Those counties preparing both manual and automated NOAs may have two effective dates for the mandated county standards.

"Immediate" Waiver Statement

Any "immediate" standard which cannot be met in a county by May 1, 1987 must be reported to the state AFDC and FS Policy Implementation Bureau as soon as possible but no later than February 1, 1987 in an immediate waiver statement.

This statement must indicate the standard(s) which cannot be met by May 1, 1987, the reason(s) the standard(s) cannot be met and the county plan for meeting the standard(s) including the proposed date. The statement is in addition to any request for equipment or software submitted to the Department for approval. However, if such a request has been submitted or will be in the future, the waiver statement must refer to it.

Waivers will only be approved for very exceptional circumstances.

"Long Term" Waiver Statement

Counties must adopt the "long term" county standards at the same time they implement the two column format. A county must report to the state any "long term" standard that cannot be met by May 1, 1987 for NOAs produced by manual means. The Long Term Waiver Statement must be submitted as soon as possible but not later than February 1, 1987. A county must report to the state any "long term" standard that cannot be met by January 1, 1992 for NOAs produced by automated equipment. This Long Term Waiver Statement must be submitted as soon as possible but no later than January 1, 1991.

Long Term Waiver Statements must indicate the standard(s) which cannot be met by the specified date, the reason(s) the standard(s) cannot be met and the county plan for meeting the standard, including the proposed date. The statement is in addition to any request for equipment or software submitted to the Department for approval. However, if such a request has been submitted or will be in the future, the waiver statement must refer to it.

Waivers will only be approved for very exceptional circumstances.

Compliance Reports

Any county which has submitted a waiver statement (either Immediate or Long Term) must also submit a compliance report within 30 days after implementing the standard(s). The compliance report must indicate the actual implementation date and must include sample copies of the NOAs sent to clients.

All waiver statements and compliance reports required by this letter should be sent to:

AFDC and Food Stamp Policy Implementation Bureau
AFDC and Food Stamp Compliance Unit, NOA Coordinator
744 P Street, Mail Station 16-31
Sacramento, California 95814

Monitoring

The state AFDC and Food Stamp Compliance Unit will be continuing the NOA monitoring procedures implemented by the Turner consent decree. Samples of the county messages in state hearings cases will be monitored and reviewed for compliance with the county NOA standards. Noncompliance with any of the standards will be examined with the county and corrected according to standard corrective action procedures.

Please contact Doris Keller at (916) 324-2655 if there are any additional questions.

ROBERT A. HOREL
Deputy Director

Attachment

cc: CWDA

COUNTY STANDARDS

FOR AFDC NOTICES OF ACTION (NOA), STUFFER MESSAGES, INFORMING NOTICES, ETC.

GENERAL

The following standards shall apply to all AFDC NOAs, stuffer messages, informing notices, etc. produced by any automated or manual means, statewide.

Imm (Immediate) - standard to be implemented by all counties on May 1, 1987.

L.T. (Long Term) - standard to be implemented when the two column NOA format is implemented May 1, 1987 or later and prior to or on January 1, 1992.

DEFINITIONS

Notice of Action (NOA) or "notice" = The entire page(s) sent to an AFDC client. It contains all the state, county and worker identification, the date of the notice, the specific message, the regulations citation(s), the state hearing information, etc.

Form or NOA form = The state approved "blank" NOA form which contains only the standard unchanging items which may be preprinted because they apply to all NOAs prepared. Examples of NOA forms are the NA 200, NA 210, NA 990, etc.

Continuation Pages = The state approved NOA forms designed to be attached to a manual or automated NOA first page. The continuation pages may be used as preprinted by the state or the counties or may be reproduced by automated equipment. The continuation pages may be "blank" or be preprinted with specific message language and/or computation(s).

Message, NOA message = The specific information applied to a "blank" NOA form. There are two general types of messages: 1) The message language which informs the client of the action to be taken by the county; and 2) the computation which informs the client of the dollar amounts affecting their eligibility, aid payment, etc. unless otherwise specified all standards referring to NOA messages incorporate both message language and computations. Not all messages are state approved. Several of the state provided manual NOA forms contain preprinted NOA message language and/or computations.

Stuffer/Informing notices = The general messages sent to all clients in a county. These messages may be required by litigation, rule changes or they may inform client of possible aid level changes due to children reaching a certain age, etc.

State approved = NOA messages or forms designed and/or written by the state and approved for county use through the Turner v. McMahon consent decree or State AFDC program management. These items are mandated for county use until replaced by subsequent state approved items.

County written = NOA messages written by counties for use in situations for which there is no state approved message. State approval prior to use is not required.

Manual (NOA) production = Those NOAs prepared or completed by handwriting or hand typing the specific message onto a preprinted NOA form.

Manual (NOA) forms = Those state approved preprinted forms designed to be completed by handwriting or hand typing.

Automated (NOA) production = Those NOAs prepared or completed by means of a word processor or computer driven printer. The printer may use pinfed or individually fed preprinted forms, individual sheets or continuous "blank" stock.

Automated (NOA) forms = The blank form(s) such as the NA 990 designed to be completed by automated equipment. To create a complete NOA on the blank automated form, both the pertinent parts of the appropriate manual form and the NOA messages will be reproduced.

Automated (NOA) equipment = The printers and computers or word processors, etc. used to produce automated NOAs.

Preprinted (by state or counties) = Those NOA items preprinted prior to the application of a specific message. The state "preprints" NOA forms for county manual use. Counties may "preprint" NOA forms for their own use in either manual or automated production.

Reproduced (by counties) = The state approved NOA items which are copied by the county onto a NOA. For instance most counties "reproduce" NOA messages on (either state or county) preprinted stock; counties using laser printers "reproduce" in one step both the NOA form and the specific message on blank stock.

I. AFDC Notice of Action (NOAs), General Format

A. Automated and Manual NOAs

(These standards apply to all NOAs whether completed manually or by automated equipment.)

(Imm) 1. The state provided NOA forms are mandated for use. The state NOA forms may be preprinted or reproduced by counties according to the following appropriate standards.

(Imm) 2. Margins shall be at least 1/4 inch wide on each side of the page.

(Imm) 3. Areas printed in a two column format must have at least 3/8" total center margin. (The center shading stripe provided by the state is 1/6" wide which allows for some white space on each side of the stripe.)

(Imm) 4. All margin areas are to be left blank with no printed characters as spacers except for the center margin shading as provided by the state.

(Imm) 5. Counties must insure only the client's name and address appear in the window of the mailing envelope. The recipient address must be printed only within the space described: left edge is 3/4" from left edge of the page; right edge is 4 1/2" from left edge of page; top edge is 2 1/2" below top of the page; and bottom edge is 3 3/8" below the top edge of the page. This space is marked by angular brackets on the manual NOA forms designed as first pages.

(Imm) 6. The area that could show through the window of an envelope must be free of written material or symbols except those printed by the state. The window space is all that directly left of the State Hearing information, above the fold line and below an imaginary line drawn directly above the word "addressee" parallel to the top of the page.

(Imm) 7. Completed individual NOAs shall be a minimum of 8 1/2 x 11 inches in size.

(L.T.)8. State approved NOA forms which are preprinted by the counties shall be as similar to the state approved forms as possible.

a) All lines, symbols, etc. provided by the state shall be in the same location except the lines provided in the upper right for "notice date", "case name", etc. need not appear on those NOA forms which will be completed by automated equipment.

b) All message language and computation items provided by the state on the manual NOA forms shall be preprinted or reproduced by counties in the same location, in the same order and in the same print style as on the state NOA forms.

(L.T.) 9. The return address space provided in the upper left section of the NOA form must be used for some form of return address or a required civil rights statement. Any other use will require prior state approval.

(Imm) 10. The latest NA Back shall be used by the counties with no alterations except to show:

a) The individual county hearings office address, and

b) The contact for a local recipient advocate if the county includes this information.

(L.T.)11. Continuation or additional pages shall be mailed with page 1; carbon sets need not be separated and recollated.

B. Automated NOAs

(These standards apply only to NOAs produced or completed by automated equipment.)

(L.T.) 1. Counties which reproduce the manual NOA forms must do so verbatim, except that:

a) The check box items not applicable to a case need not be reproduced.

b) The computation items which would show a zero need not be reproduced.

c) The lines indicating blanks to be filled in need not be reproduced.

d) Nonessential information and county directions, such as "Other Countable Income (list sources)" need not be reproduced.

(Imm) 2. NOA format and appearance shall be as similiar to the state approved forms as possible. All lines, symbols, etc. provided by the state shall be in the same location except for those items in I.A.8.a and I.B.1 above.

(L.T.) 3. Counties must be able to reproduce the complete computation portion of NOAs as provided by the state. This standard does not apply to the specific computation(s) which a county elects not to automate.

(Imm) 4. Counties must reproduce the computation portion of the NOAs following the message language portion. (This is an interim standard; it will apply only until the county converts to the two column format for its automated NOAs.)

C. AFDC NOA Messages, General

(These standards apply to: 1) the NOA message language or computations specifically, as indicated, and 2) all NOAs whether produced or completed manually or by automated equipment, unless otherwise indicated.)

(Imm) 1. State approved NOA message language which is mandated for statewide use shall be reproduced by the counties verbatim except for the exemptions listed in I.B.1. above.

(Imm) 2. Individual state approved NOA message language shall be reproduced by counties in the same (wording) sequence as provided.

(Imm) 3. The print type, size and style as provided on the state approved messages shall be reproduced as closely as possible within current county NOA production capabilities. (See ACL in Section III E at page 112 of the Turner plan regarding the enhancement of automated NOA production.)

(Imm) 4. When no appropriate NOA message has been provided by the state, counties shall write their own NOA messages. These county written NOA messages shall follow the written guidelines for message writing provided by the state and must include the appropriate regulation citation(s). State approval of these county written messages is not required prior to use.

This standard does not apply to the implementation of court cases, emergency regulations, etc. where the state has clearly indicated messages are being developed and will be transmitted.

(Imm) 5. NOA message language reproduced by counties shall retain the state's format as closely as possible. The message language shall be divided into sentences and paragraphs in the same places, indents shall appear in the same places, etc.

(Imm) 6. Manual NOAs shall show and use all the computation items provided by the state.

(Imm) 7. The counties may add information to state approved NOA message language and computations only for purposes of:

a) Completing the blanks, and/or

b) Adding connecting words or phrases between two or more state approved NOA messages or between state approved and county written NOA messages following the written guidelines for message writing provided by the state.

The additional language used in (a) and (b) above does not require state approval prior to use but shall be written following the written guidelines provided by the state.

(Imm) 8. Future state approved NOA message language automatically supersedes county written and/or previously state approved NOA messages for the same policy area.

(L.T.)9. Future state approved NOA computations automatically supersede county written and/or previously state approved computations for the same area.

(L.T.)10. When more than one NOA message will apply to a case, all the language shall be printed on one NOA, which may be one or more pages in length. The county may combine state approved and county written language and may add connecting phrases if needed.

D. AFDC NOA Message Locations

(Applicable only to the two column format for both manual and automated NOAs)

(L.T.)1. Computation Portion

a) The starting point for the standard budget or eligibility computation portion of a NOA message shall be at the top of the right column of page 1.

b) If the standard budget or eligibility computation will not fit in the right column it shall continue to the right column of page 2.

c) Following the end of the standard budget or eligibility computation, counties shall leave at least one blank line; and then reproduce a line of hyphens or a broken solid line to represent the end of that section.

(L.T.)2. Message Language Portion

a) The standard starting point for the message language portion of the NOA shall be at the top of the left column of page 1.

b) In situations where the entire message language will not fit in the left column it shall continue to:

i) The top of the right column if there is no computation needed for the NOA, or

ii) The right column following the line of hyphens (see standard I.C.1.c) at the end of the computation, provided the balance of the message will fit on the page 1, or

iii) The top of the left column on page 2.

II. Other Notices

A. Stuffer and Informing notices

(Imm) 1. Standards I.A.2, 3, 4, 8 & 9 must be met.

(Imm) 2. State approved message language shall be used verbatim except those exceptions in I.B.1.

(Imm) 3. County written messages shall follow the format and language pattern established by the state. State approval of these county written messages is not required prior to use.

Deviations from any of the county standards after the implementation date may be allowed. Counties must request individual deviations in writing, explaining the technical problems with implementing the standard(s). Included in the request shall be a plan to solve the problem(s) if possible and samples of the NOAs the county will produce in the interim. State response to a county request will be transmitted within 30 days of receipt by the State.