CALFRESH (CF) PROGRAM
REQUEST FOR POLICY/REGULATION INTERPRETATION

INSTRUCTIONS: Complete items 1 - 10 on the form. Use a separate form for each policy interpretation request. If additional space is needed, please use the second page. Be sure to identify the additional discussion with the appropriate number and heading. Retain a copy of the CF 24 for your records.

- Questions from counties, including county Quality Control, must be submitted by the county CalFresh Coordinator and may be submitted directly to the CalFresh Policy analyst assigned responsibility for the county, with a copy directed to the appropriate CalFresh Policy unit manager.
- Questions from Administrative Law Judges may be submitted directly to the CalFresh Policy analyst assigned responsibility to the county where the hearing took place, with a copy of the form directed to the appropriate CalFresh Bureau unit manager.

1. RESPONSE NEEDED DUE TO:
   - ☑ Policy/Regulation Interpretation
   - ☐ QC
   - ☐ Fair Hearing
   - ☐ Other:

5. DATE OF REQUEST: September 11, 2012
   NEED RESPONSE BY: September 30, 2012

6. COUNTY/ORGANIZATION: Merced County

7. SUBJECT: Initial CalFresh benefits when granting CW

2. REQUESTOR NAME:

3. PHONE NO.:

4. REGULATION CITE(S): 63-503.242(b)(1), 63-301.633, 63-301.633(a), 63-301.634

8. REFERENCES: *(Include ACL/ACIN, court cases, etc. in references)*
   NOTE: All requests must have a regulation cite(s) and/or a reference(s).

9. QUESTION: (INCLUDE SCENARIO IF NEEDED FOR CLARITY):

When applying for CalFresh and CalWORKs at the same time, do initial PA payments received after the initial benefit month count toward the initial CalFresh budget?

Household applied for CalFresh and CalWORKs in August 2012. Eligibility Determination was made 9/7/12. Since the CalWORKs benefits were not received until after the initial month of application, should they be counted in the CalFresh budget?

10. REQUESTOR'S PROPOSED ANSWER:

Per regulation 63-503.242(b)(1), income shall be counted only in the month it is expected to be received. While 63-301.633 indicates that the initial PA payments should be anticipated, 63-301.633(a) indicates that if PA payments will be received after the subsequent month (September in this case) then the benefits should varied accordingly. This implies that the initial PA payment would not be counted. 63-301.634 states that retroactive PA payments would be considered lump sum payments and thus would not count toward the FS grant.

So the August 2012 PA payment received in September 2012 would not count at all to the August 2012 CalFresh budget and would be disregarded for the September 2012 CalFresh budget as a lump sum payment.

11. STATE POLICY RESPONSE *(CFPB USE ONLY)*:

The state concurs with the requestors proposed response in regards to the August payment - regular rules would apply to September benefits. Per MPP 63-501.111 (under 63-501.1 Definition of Resources) a nonrecurring lump sum payment includes retroactive payments from the approval of an application for any assistance program.

FOR CDSS USE

DATE RECEIVED:

DATE RESPONDED TO COUNTY/ALJ: