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: 12/30/13
   NEED RESPONSE BY: 1/30/14

6. COUNTY/ORGANIZATION: Imperial County

7. SUBJECT: CalFresh VUR/HH Comp Change

2. REQUESTOR NAME:

3. PHONE NO.:

4. REGULATION CITE(S): 7 CFR 273.12 a (5) (vi)

8. REFERENCES: *(Include ACL/ACIN, court cases, etc. in references)*
   NOTE: All requests must have a regulation cite(s) and/or a reference(s).
   ACL 13-17; ACIN I-58-13

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

Senario: Mom and 2 children are receiving CalWORKs and CalFresh and is in the Jan-Jun SAR payment period. On Feb. 10, Mom calls and reports Dad in the home. Dad is working and his income does not put the family over the CalWORKs IRT (The only IRT the family has been notified about). A face-to-face interview is scheduled in order to gather information to add Dad to the case and to inform him of his rights and responsibilities. All information is provided and verified. Dad's CalWORKs beginning date of aid would be July 1 (held over until the beginning of the next SAR payment period) as Dad's income would cause a decrease to the CalWORKs grant mid-period if added sooner.

Question 1: What would Dad's CalFresh beginning date of aid be?
Question 2: Is it possible that Dad is aided on CalFresh and not be aided on CalWORKs?

10. REQUESTOR'S PROPOSED ANSWER:

Answer 1 (According to ACL 13-17 and ACIN I-58-13): Dad's CalFresh beginning date of aid would be March 1 as the report of Dad moving back into the home is now VUR (all information has been verified) and CalFresh must take action even if it causes a decrease in the CalFresh allotment.
Answer 2 (According to ACL 13-17 and ACIN I-58-13): Yes, this is possible.
Answer 1 (According to 7 CFR 273.12 a (5) (vi)): "...For other changes, the State agency need not act if the household reports a change for another public assistance program in which it is participating and the change does not trigger action in that other program but results in a decrease in the household's food stamp benefits. The State agency must act on all other changes..."-- Dad's CF beginning date of aid would be July 1, like CalWORKs.
Answer 2 (According to 7 CFR 273.12 a (5) (vi)): No, both programs would take action at the same time.

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

The state concurs with the first set of proposed responses. According the ACL 13-17 and ACIN I-58-13, the father's beginning date of aid for CalFresh would be after the application and all verification from the interview is provided, in this case on March 1. The change in CalWORKs income would be budgeted for when the CalWORKs allotment changes, in this case on July 1 at the beginning of the next SAR payment period.

As clarified in ACL 12-25 E and ACIN I-58-13, 7 CFR 273.12(a)(5)(vi) refers to mandatory reports made to another public assistance program; if the other program does not act on the change then CalFresh will not act on the change.

FOR CDSS USE

DATE RECEIVED:	DATE RESPONDED TO COUNTY/ALJ:
1/10/14	1/28/14 Tawny Macedo