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:
   - [x] Policy/Regulation Interpretation
   - [ ] QC
   - [ ] Fair Hearing
   - [ ] Other:

5. DATE OF REQUEST: 2/11/2013
   NEED RESPONSE BY: 2/14/2013

6. COUNTY/ORGANIZATION: County of Riverside

7. SUBJECT: ES, CalFresh Certification Period

2. REQUESTOR NAME:

3. PHONE NO.:

4. REGULATION CITE(S): ACL 12-74

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):

The California Department of Social Services (CDSS) is simplifying the certification process for all HH issued CF benefits under ES in conjunction with the implementation of Assembly Bill (AB) 1359. In current state regulations, quarterly reporting (QR) and change reporting (CR) HHs are treated differently regarding certification length.

In an effort to promote program simplification, all HHs issued CF benefits under ES must be certified for the maximum certification time period allowable, in accordance with the HH's circumstances. For example:
ES application with all verifications provided 12 months
ES with postponed verifications – application on or before the 15th - 1 month
ES with postponed verifications – application after the 15th 2 months
Elderly and Disabled HH's ES application with all verifications- 24 months- (Is this correct? Are there still one month certs?)

10. REQUESTOR'S PROPOSED ANSWER:

I am not sure. This ACL could mean counties issue one month in ES benefits but give a 12 month certification period. How has certification periods for Change Reporting households changed with this ACL?

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

Assembly Bill (AB) 1359 requires that, as of January 1, 2013 all CalFresh applications be screened for ES. ACL 12-74 attempts to simplify the process by making it possible to treat QR and CR to be treated the same for purposes of certification, as allowable, in accordance with the HHs circumstances.

7 CFR 273.2(i)(4)(iii) states: Households that are certified on an expedited basis and have provided all necessary verification... shall be assigned normal certification periods.

This means that whatever the normal certification period for the client would be under either QR or CR.

continued on next page.

FOR CDSS USE

DATE RECEIVED: February 11, 2013

DATE RESPONDED TO COUNTY/ALJ: March 15, 2013

CALFRESH (CF) PROGRAM
REQUEST FOR POLICY/REGULATION INTERPRETATION (Continued)

1. RESPONSE NEEDED DUE TO: ☐ Policy/Regulation Interpretation ☐ QC ☐ Fair Hearing ☐ Other:	5. DATE OF REQUEST:	NEED RESPONSE BY:
	6. COUNTY/ORGANIZATION:	
	7. SUBJECT:	
2. REQUESTOR NAME:	8. REFERENCES: *(Include ACL/ACIN, court cases, etc. in references)* **NOTE: All requests must have a regulation cite(s) and/or a reference(s).**	
3. PHONE NO.:		
4. REGULATION CITE(S):		

ACL 12-74 states: CDSS is simplifying the certification process for all households issued CalFresh benefits under ES in conjunction with the implementation of AB 1359. This simplification is in compliance with 7 CFR § 273.2(i)(4)(A) and (B). In current state regulations, quarterly reporting (QR) and change reporting (CR) households are treated differently regarding certification length. Effective January 1, 2013, in an effort to promote program simplification, all households issued CalFresh benefits under ES will be certified for the MAXIMUM CERTIFICATION ALLOWABLE, in accordance with the household's circumstances.

On or before the 15th day of the month:
The intent of ACL 12-74 is to clarify to counties that they should follow the federal regulations in accordance with 7 CFR 273.2 (i)(4(iii) (A) and (B) when households apply for CalFresh benefits under ES, when applying on or before the 15 day of the month. Households must provide the postponed verification prior to the end of the month of application in order for that household to continue to receive benefits for the subsequent month and the remaining months of their certification period. If the household fails to provide the postponed verification within the month of application, the case is discontinued and the household will have to reapply.

On or after the 15th day of the month:
This is also true for households that apply on or after the 15th of the month. The household shall be issued CalFresh benefits for the month of application and the subsequent month at the same time. In order for the household to continue to receive benefits for the third month, the household must provide the postponed verification within 30 days following the date of application. If they fail to provide their postponed verification within the 30th day, the household's case will be discontinued prior to the third month and the household will need to reapply.

ACL 12-74 is providing instructions to counties to simplify the process

The bottom line is that ACL 12-74 simplifies the process for ES certification by assigning the maximum amount of time for the household's certification periods up to federal law allows which will either be 6 months, 12 months or 24 months once the household has provided the postponed verification, whether they are QR or CR, in accordance with the household's circumstances. So whatever the maximum amount of certification time would normally be, that's what the amount of time that you will certify the household.