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:

2. REQUESTOR NAME:

3. PHONE NO.:

4. REGULATION CITE(S):

5. DATE OF REQUEST: 4/24/2015

NEED RESPONSE BY: 05/04/2015

6. COUNTY/ORGANIZATION: Placer County Human Services

7. SUBJECT: Extended Filing Date - Recertification

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

Amended Regs 63-102(e)(5)(SAR)

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

While doing research for a Fair Hearing, we came across these amended regs below:

(SAR) "Extended Filing Date" in a Semi-Annual Reporting system is by close of business on the first working day of the month following the Submit Month and is the final date by which the household must submit a complete mid-period report or recertification, including all required verification, without penalty of termination of eligibility or disallowance of deductions. 63-102(e)(5)(SAR)

We apply these rules for the SAR 7 but are unclear if they should also be applied at Recertification for a non-assistance CalFresh case.

10. REQUESTOR'S PROPOSED ANSWER:

Yes. As stated in the regulation above, the "Extended Filing Date" rule should be applied at mid-period report (SAR7) or Recertification.

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

The new SAR regs are up for review and have not been officially adopted yet. Until these regs are officially adopted the present rules regarding recertification filing dates apply. Given that,, for SAR, the extended filing date is the first working day of the month following the submit month. That was true in QR and is still true in SAR. The new SAR regulations do not alter that.

As to recertifications, per ACL 12-25, Page 19: "All existing regulations relevant to... CalFresh recertifications at MPP Section 63-504.6 will continue to apply in the SAR system."

FOR CDSS USE

DATE RECEIVED:	DATE RESPONDED TO COUNTY/ALJ:
April 24, 2015	April 30, 2015 (WEB)