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: 8/13/15

NEED RESPONSE BY: 8/21/15

6. COUNTY/ORGANIZATION: Solano County

7. SUBJECT: MCE/IRT Status/Over Issuance

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 14-56, ACIN I-50-13

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

Scenario: The Overpayments and Recovery Unit computes client error overissuances. These are generally caused by the HH's failure to report income or new HH members when required to do so, at SAR7, RRR, IRT, or Change Report. The OI is generally discovered after the fact and may impact several prior mandatory reports.

Question: When it is discovered that the NACF HH failed to make prior mandatory reports of income or HH changes, will the MCE status be removed retroactively and the HH be held to 130% gross income limitation vs. 200% for purposes of the OI computation? If MCE status is removed retroactively, would it be effective with the first instance of failure to report?

10. REQUESTOR'S PROPOSED ANSWER:

MCE status is not removed retroactively.

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

CDSS concurs with the proposed response.

FOR CDSS USE

DATE RECEIVED: 08/13/15

DATE RESPONDED TO COUNTY/ALJ: 0/14/15