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. 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): 63-508.3/508.4

5. DATE OF REQUEST: Resent 10/01/12

NEED RESPONSE BY: ASAP -orig request 6/2012

6. COUNTY/ORGANIZATION: Monterey

7. SUBJECT: RAI based on Data Month Income

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 09-41/E
ACL 12-25

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

Ongoing case—customer completes their QR7. Indicates in question #1 that during the data month the husband received four weekly checks with gross amounts of: $250, $200, $225, and $800; all other QR 7 questions are answered 'No'. Customer is a farm laborer and is paid by piece rate; there is no indication on $800 check stub that customer worked overtime or received vacation pay. This is typical for our seasonal farm labor and is not unusual to have fluctuating income based on the type of crop(s) worked.
Is the QR 7 complete and CWD would take the average of the four checks and multiply using the weekly 4.33 conversion factor for the upcoming payment qtr? or Should CWD consider the $800 check questionable and follow-up with the customer is required to determine how much income the household reasonably anticipates for the upcoming payment qtr?

10. REQUESTOR'S PROPOSED ANSWER:

1) CWD would place courtesy call to the client and clarify if the $800 weekly income amount can be reasonably anticipated to continue for upcoming payment quarter. If unable to reach the client we would use the Data month income as reported, since no changes were anticipated by customer for the upcoming quarter.

2) If contact is required due to the questionable data month income, the CWD would append NA 960Y notice to state: "We need more information about the new job or income you reported. Please call your worker to provide the required information". Please note: This process could lead to dropped benefits because unless the customer speaks directly with the worker, it is not clear to the customer what missing verification is needed for the QR 7 to be determined complete.

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

The described scenario creates several questions which need clarification regarding eligibility. First, it is indicated that this is a seasonal farm worker, and as such should be designated as a change reporting household per MPP 63-102(c)(11)(QR). Secondly, the determination of the reasonably anticipated income for the upcoming payment quarter (if it is a QR case) or the remainder of the certification period (if it is a change reporter case) is unclear. The CWD should contact the recipient in order to determine the reporting status and the amount of income that can be reasonably anticipated. As described, there was no indication that the QR 7 was NOT submitted timely and incomplete. However, as stated, continued eligibility is unclear and the county must contact the recipient to obtain the necessary information. If the recipient doesn't respond, the case can be terminated for failing to provide the necessary information requested.

FOR CDSS USE

DATE RECEIVED:	DATE RESPONDED TO COUNTY/ALJ:
8/21/14	1/2013 (SC)