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: 3/20/15
   NEED RESPONSE BY: 3/27/15

6. COUNTY/ORGANIZATION: Santa Barbara County

7. SUBJECT: SAR 7 Income Verification and Prospective Budgeting

2. REQUESTOR NAME:

3. PHONE NO.:

4. REGULATION CITE(S):

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):

A worker is processing a Cycle 3 case. Data Mo 1/15, Submit Mo 2/15. On the 1/15 SAR 7 the client states that her husband stopped working in January. When the worker is processing the SAR 7 she calls the client and confirms that her husband stopped working in January. The client tells the worker that her husband got a new job in February and that she already provided the pay stub to the county and that it is on file. The amount of the new check is accurate as to what the CF HH is expected to receive in the upcoming SAR payment period (3/15 - 8/15).

Question: Is it necessary for the worker to obtain verification of job term?

10. REQUESTOR'S PROPOSED ANSWER:

SAR 7 rules have been simplified in order to more closely align with the federal guidance on prospective budgeting. If the worker has no conflicting information, the income and anticipated changes reported on the SAR 7 or RD/RC forms should be used to determine benefits for the upcoming SAR period. The fact that the HH received income in the past and now reports that the income has stopped does not mean there is a conflict. Absent other information known to the county, the SAR 7 or RD/RC information should be accepted, as these forms are signed under penalty of perjury and may be treated as an affidavit.

It would not be necessary for the client to obtain verification of job termination. The client has enough information that is not conflicting in order to process the SAR 7 and compute the budget for the upcoming SAR payment period.

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

The client's statement on the SAR 7 or RD/RC is not sufficient documentation, in and of itself. As stated on page 50 of ACL 12-25E, "Acceptable verification includes (but is not limited to): paycheck and benefits stubs (i.e., unemployment or disability benefits stubs), or a letter from the employer. If the recipient provides such verification, the CWD should accept the verification unless there is a documented reason to doubt its validity. If verification is not accepted, the reason must be documented in the case file. If the recipient is attempting to obtain the verification, but is having trouble, the CWD must offer to help. With the recipient's written permission, the CWD may contact the employer to verify the recipient's statement. If verification does not exist or is not available, an affidavit or sworn statement is acceptable verification of earnings in both CalWORKs and CalFresh. Otherwise, the CWD shall inform the individual in writing what information must be listed on the affidavit and provide 10 days to submit it. Collateral contacts may also be used for CalFresh households.

FOR CDSS USE

DATE RECEIVED:	DATE RESPONDED TO COUNTY/ALJ:
3/20/15	ee 3/26/15

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: 3/20/15	NEED RESPONSE BY: 3/27/15
	6. COUNTY/ORGANIZATION: Santa Barbara County	
	7. SUBJECT: SAR 7 Prospective Budgeting	
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).** ACL 12-25	
3. PHONE NO.:		
4. REGULATION CITE(S): ACL 12-25		

ACL 12-25 pg. #25
Prospective Budgeting

The SAR system uses the anticipated income/prospective budgeting methodology for determining continuing recipient benefits. These rules have been simplified in order to more closely align with the federal guidance on prospective budgeting. Prospective budgeting requires CWDs to use income that the applicant or recipient anticipates with reasonable certainty will be received in the upcoming semi-annual period. Income from the SAR Data Month, as well as any reasonably anticipated changes in income and expenses, shall be used as an indicator of the income that is and will be available to the AU/household for the upcoming SAR Payment Period. Changes in income reported mid-period will be evaluated using the current (report) month's income and any anticipated changes.

It is critical that CWD staff thoroughly document how income was projected in determining benefit calculations. Case narratives and other documentation will be particularly critical when documenting any changes in income, including, but not limited to: new income, income that is ending, income that is expected to change, income that fluctuates (including anomalies such as overtime or missed work), and income that is so unstable that the recipient cannot make a reasonable estimate of what income to expect in future months. If the CWD has no conflicting information, the income and anticipated changes reported on the SAR 7 or RD/RC forms should be used to determine benefits for the upcoming SAR period. The fact that an AU/household received income in the past and now reports that the income has stopped does not mean there is a conflict. Absent other information known to the county, the SAR 7 or RD/RC information should be accepted, as these forms are signed under penalty of perjury and may be treated as an affidavit. For CalFresh Quality Control purposes, reviewers will rely heavily on case documentation when reviewing case files to determine if benefits have been issued in the correct amounts.