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

2. REQUESTOR NAME:

3. PHONE NO.:

4. REGULATION CITE(S): 63-508.321

5. DATE OF REQUEST: 5/12/15

NEED RESPONSE BY: ASAP

6. COUNTY/ORGANIZATION: Humboldt County DHHS - SS

7. SUBJECT: SAR 7 reporting responsibility

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

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

Can a customer be held responsible (overissuance processed) for failing to report mandatory information if their report form doesn't ask them the question?

For example, a customer marries their live-in boyfriend prior to the SAR 7 submit month but they didn't purchase & prepare together previously so he wasn't on the CalFresh case. The SAR 7 doesn't ask this question for CalFresh, only if someone moved in or out of the home. So if the marriage is later discovered at re-evaluation and his income at the time would have made the household ineligible would the county be correct in writing up an overissuance even though the customer reported appropriately based on the wording of the SAR 7?

10. REQUESTOR'S PROPOSED ANSWER:

No, the recipient is required to report changes in household composition at SAR (63-508.321) but since the report form only asks them to report someone moving in or out of the home, an overissuance would not be appropriate in this case.

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

CDSS concurs with the proposed response.

FOR CDSS USE

DATE RECEIVED:

DATE RESPONDED TO COUNTY/ALJ: AB 5/29/2015