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: 06-12-14

NEED RESPONSE BY: 06-24-14

6. COUNTY/ORGANIZATION: County of Ventura

7. SUBJECT: SSI/SSP Non-Pay

2. REQUESTOR NAME:

3. PHONE NO.:

4. REGULATION CITE(S): MPP 63-402.226

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

MPP 63-402.226

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

MPP 63-402.226 reads in part that a person must actually receive, not merely have applied for, SSI/SSP benefits to be determined ineligible for the Food Stamp Program. It also reads in part that, that once receiving SSI/SSP benefits, the person will remain ineligible for food stamp benefits until actually terminated from the SSI/SSP Program; periods of non-receipt or suspension of SSI/SSP payments do not restore food stamp eligibility. We have come to understand that the 12 months after discontinuance from SSA that the former SSI recipient is put in a Non-pay status in MEDS (coded with an "N") and has certain rights to restore eligibility without completing the entire SSI application process with SSA. Is this 12 month period when the person is coded as "non-Pay" in MEDS considered a "period non-receipt or suspension" therefore making the person ineligible to CalFresh or is the person eligible to CalFresh in the subsequent month after discontinuance regardless of status? Just by the nature of stopping SSI does the person become potentially CalFresh eligible? (Continued)

10. REQUESTOR'S PROPOSED ANSWER:

The 12 month period after termination from SSI-SSP benefits is coded as "non-pay" in MEDS and is a period of suspension from SSI-SSP. A former recipient of SSI can re-open SSI by meeting specified criteria and does not need to re-apply for SSI. During this suspension period the former SSI recipient is CalFresh ineligible. If the client does not intend to try to restore SSI they can contact SSA and have their status changed to terminated. By doing this they forfeit their right to try to restore SSI and would need to reapply for SSI if desired however once this is done they can be potentially CalFresh eligible.

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

CDSS concurs with the county's proposed answer (See MPP 63-402.226). "Non-Pay" status in MEDS translates to CalFresh Policy found at MPP 63-402.226 as a period of non receipt or suspension of SSI/SSP benefits, since the client has not terminated SSI/SSP and is also not in receipt of any cash payment.

FOR CDSS USE

DATE RECEIVED: 8/18/2015

DATE RESPONDED TO COUNTY/ALJ: 8/21/2015(SV 916-654-1940)

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:	NEED RESPONSE BY:
	6. COUNTY/ORGANIZATION:	
	7. SUBJECT:	
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).**	
3. PHONE NO.:		
4. REGULATION CITE(S):		

9. (continued from previous page). Can you clarify the definition of a periods non-receipt or suspension?