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: 9/13/2012

NEED RESPONSE BY: 9/23/2012

6. COUNTY/ORGANIZATION: Shasta County

7. SUBJECT: Student Eligibility and Job Quit

2. REQUESTOR NAME:

3. PHONE NO.:

4. REGULATION CITE(S): 63-406.111(a)(1), 63-406.2, 63-407.21, 63-408.41

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

CFR 214.3(2)(G)(iii)(C)

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

• Is X School considered an Institution of Higher Education for CalFresh which would mean this client is subject to CalFresh student rules?
• Do students that go to X School meet good cause for job quit based on "Work Registrant accepts a job or enrolls at least half-time in any recognized school, training program, or institution of higher education that requires the individual to leave employment" (63-407.21(h)?
• If the student is unable to get verification as to their study program at X School and it is not questionable, do we take a Declaration of Facts as to whether they are attending a "business, trade, technical or vocational school at the post-high school level that normally requires a high school diploma or equivalency certificate for enrollment " per 63-406.111(a)(1)? Or do we require every student attending X School to submit a verification of their study plan and deny or discontinue if that verification is not received since study plans vary greatly at this school. (Scenario on Page 2)

10. REQUESTOR'S PROPOSED ANSWER:

• Since X School is a USCIS-recognized school and the client states she needed a high school diploma to be accepted in her course of study, this client would be considered a student under CalFresh regulation 63-406.111(a)(1).
• We did not receive any verification from X School. Since the client's statement is not questionable, her Declaration of Facts regarding her course of study is acceptable proof as to her student status.
• Based on currently available information, this client is subject to CalFresh Student Eligibility rules and does not meet any of the exception criteria per 63-406.2.
• She would be considered an ineligible student per 63-406.1.
• The client is a student at a recognized institution of higher education that requires the individual to leave employment and therefore exempt from Work Registration requirements (and therefore Job Quit regulations) as under 63-407.21(h) and also under good cause 63-408.41(e).

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

Based on the information given, this client is subject to CalFresh Student Eligibility rules and does not meet any of the exception criteria per MPP 63-406.2. Therefore, the client would be considered an ineligible student per MPP 63-406.1.

FOR CDSS USE

DATE RECEIVED:

DATE RESPONDED TO COUNTY/ALJ:

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: 9/13/2012	NEED RESPONSE BY: 6/23/2012
	6. COUNTY/ORGANIZATION: Shasta County	
	7. SUBJECT: Student Eligibility/Work Registration -Recognized School	
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).** CFR 214.3(2)(G)(iii)(C)	
3. PHONE NO.:		
4. REGULATION CITE(S): 63-406.111(a)(1), 63-406.2, 63-407.21, 63-408.41		

#9 - Question Continued:

Case Scenario:
- Client quit a 40 hour job to attend X School here in Redding within 60 days of the application date.
- Client is a student in a 10-month ministry training program and does not have any exemptions to CalFresh student rules.
- Client states she believes she needed to have a high school diploma.
- X School offers its international student M-1 visas.

In order to offer an M-1 visa, a school must be recognized by the U.S. Citizenship and Immigration Services (USCIS) as a school offering a full course of study in a vocational or nonacademic training program under CFR 214.

USCIS recognition of a school is done through the Student and Exchange Visitor Information System (SEVIS) and X School is listed on its website.