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:

2. REQUESTOR NAME:

3. PHONE NO.:

4. REGULATION CITE(S):
   63-406.11; 63-406.2

5. DATE OF REQUEST: 01-16-2014

NEED RESPONSE BY: 01-31-2014

6. COUNTY/ORGANIZATION:
   Lake County Department of Social Services

7. SUBJECT:
   Student eligibility for CalFresh benefits

8. REFERENCES: *(Include ACL/ACIN, court cases, etc. in references)*
   NOTE: All requests must have a regulation cite(s) and/or a reference(s).
   SHD Paraphrased Regs - CalFresh 244-5

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

CalFresh (CF) applicant is a forty-one (41) year old enrolled in a community college program more than half time. She is not working and there are no children in the household. Lake County does not have an FSET program. Applicant does not meet any of the student eligibility requirements set forth in 63-406.2. Applicant appears to be ineligible to CF due to her student status. However, applicant provided proof she is an active participant in a two-year Workforce Investment Act (WIA) program through the Workforce Lake (WFL) and Mendocino Private Industry Council (MPIC). Per discussion with WFL/MPIC in Clearlake, WIA is a Title I program.

Does her participation in a WIA program make her eligible to a student exemption? Does WIA meet the student exemptions in 63-406.2? Or is the applicant ineligible to CF benefits due to her student status?

10. REQUESTOR'S PROPOSED ANSWER:

If the WIA program qualifies as a one of the student exemption programs in 63-406.2, then the applicant is eligible to a student exemption and is therefore eligible to CF benefits.

If WIA does not meet the student exemption programs in 63-406.2, then the applicant is not eligible to CF due to her student status.

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

The Job Training Partnership Act was replaced by the Workforce Investment Act (WIA). Therefore, the WIA qualifies as one of the eligible student exemption programs specified in MPP 63-406.216.

FOR CDSS USE

DATE RECEIVED:	DATE RESPONDED TO COUNTY/ALJ:
January 16, 2014	february 4, 2014 (JN)