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: 07-12-2013
NEED RESPONSE BY: 07-31-2013

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

7. SUBJECT: Student eligibility for CalFresh benefits

2. REQUESTOR NAME:

3. PHONE NO.:

4. REGULATION CITE(S): 63-406.11(Students); Title 7 Part 273.5(b)(11)

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 96-07

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

CalFresh applicant is a twenty (20) year old enrolled in a community college program more than half time for Summer 2013 and Fall 2013. She is not working, has no children and appears to be ineligible to CalFresh benefits due to her student status (63-406.11). Applicant provided verification from the community college that she is an active participant in good standing in the Extended Opportunities Programs and Services (EOP&S). Applicant also provided information from the Western Center on Law & Poverty stating, in part:
You are participating in the Extended Opportunity Programs and Services (EOPS), which could be (and we say should be) defined as "a training program paid for by the state or local government," and eligible for a student exemption under 7 Code of Federal Law 273.5(b)(11).
Is applicant ineligible to CalFresh benefits due to her student status? Or does her participation in EOP&S make her eligible for a student exemption?

10. REQUESTOR'S PROPOSED ANSWER:

If EOP&S is not considered a training program paid for by the state or local government, then the applicant is not eligible to CalFresh due to her student status.

If EOP&S is considered a training program that qualifies and is paid for by the state or local government, then applicant is eligible to a student exemption and is therefore eligible to CalFresh benefits.

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

The EOPS program does not provide a work study program nor does it provide an employment and training program. Therefore, the applicant does not meet the eligibility requirements set forth in MPP63-406.2 and does not qualify for the student eligibility exemption status.

FOR CDSS USE

DATE RECEIVED:	DATE RESPONDED TO COUNTY/ALJ:
July 12, 2013	August 1, 2013