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: 10/14/15
   NEED RESPONSE BY: 10/31/15

6. COUNTY/ORGANIZATION: Contra Costa County

7. SUBJECT:

2. REQUESTOR NAME:

3. PHONE NO.:

4. REGULATION CITE(S): MPP 63-502.2(q)(1)

8. REFERENCES: *(Include ACL/ACIN, court cases, etc. in references)*
   NOTE: All requests must have a regulation cite(s) and/or a reference(s).
   ACIN -54-09

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

Client reports at Intake that she is a participant in a Transitional Housing Program with an agency called Environmental Alternatives. She receives from them a monthly stipend of $1375 and will continue to receive this until she turns 21 as long as she is compliance with the program requirements. The stipend is not financial aid or an educational grant. Do we count this as unearned income for CalFresh or is this considered excluded income, based on the regulations below.

Per regulations 63-502.2(q)(1)(E) page 246:
Examples of excluded income include, but are not limited to, the following:
Independent Living Program (ILP). Income and incentive payments earned by a child 16 years of age or older who is participating in the ILP - See 2nd page for ACIN example.

10. REQUESTOR'S PROPOSED ANSWER:

It would appear that MPP 63-502.2(q) contradicts the response given in the ACIN 1-54-09 which states that the stipend should be counted as unearned income.

County's response is that the stipend should be counted as unearned income since it is not earmarked for anything such as housing. She has access to the funds and can use for anything without restrictions.

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

The Transitional Housing Program (THP) does not fall under the criteria of the Independent Living Program found at MPP 63-502.2(q).
The THP, in this case, has made money available to the youth. Whether spent, held or put into personal savings would be considered unearned income in the month received for the CalFresh budget (MPP Section 63-502.14).

FOR CDSS USE

DATE RECEIVED: 11/3/2015

DATE RESPONDED TO COUNTY/ALJ: 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):		

Part of County's Response:

Per ACIN 1-54-09 has a question that references the money from THP-PLUS program being used in CalFresh as follows: How are the food stamp benefits calculated, when considering the monies received from the THP-Plus program?

a) The payment is a set amount for those who qualify regardless of any other income. The funds are given to an outside agency that administers the program for the county and works with the youth.

b) A set amount goes into an Emancipation Fund account which cannot be accessed until the youth is out of the program. A budget is set up for the child's living expenses and varies based on the child's needs which also includes discretionary funds. These funds will also pay the housing expenses for a child that is either living on their own or living in a group home environment.