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:
   - [x] Policy/Regulation Interpretation
   - [ ] QC
   - [ ] Fair Hearing
   - [ ] Other:

5. DATE OF REQUEST: 2/28/14
   NEED RESPONSE BY: 3/7/14

6. COUNTY/ORGANIZATION: Santa Barbara County

7. SUBJECT: Telephonic Signature

2. REQUESTOR NAME:

3. PHONE NO.:

4. REGULATION CITE(S): ACIN I-60-13

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 I-60-13

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

Per ACIN I-60-13 A telephonic signature is a type of electronic signature that uses an individual's recorded spoken signature or verbal assent in place of an actual written signature, and is considered legally enforceable under certain conditions. The use of a telephonic signature, as part of the application or redetermination/recertification process, will eliminate the process of mailing documents in order to gather a client's ink signature. Section 1633.7(c) of the UETA specifies that if a law requires a signature, an electronic signature satisfies the law. Further, an electronic signature is defined at section 1633.2(h) as an electronic sound, symbol, or process attached to or logically associated with an electronic signature.
Question: Could the use of the check box in the electronic case file in conjunction with a case comment be used instead of the verbal recording?

10. REQUESTOR'S PROPOSED ANSWER:

Please reference PI from SB county dated 1/8/14.

Per Civil Code section 1633.7 - it states that an electronic signature could be a sound, symbol, OR PROCESS attached to or logically associated with an electronic signature. It is our understanding that the check box in the electronic case file, in conjunction with a case comment may be used instead of the verbal recording.

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

The check box in the electronic case file, along with case comments, may not be used instead of the verbal recording. ACIN I-60-13 (page three) states as part of the Farm Bill Provisions, as mandated by 7 U.S.C. § 2020(e)(2)(C), "CWDs must record both the household's verbal assent that it is officially applying for benefits and the information it is assenting to."

FOR CDSS USE

DATE RECEIVED: February 28, 2014

DATE RESPONDED TO COUNTY/ALJ: March 3, 2014 JN