

## 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: <input checked="" type="checkbox"/> Policy/Regulation Interpretation <input type="checkbox"/> QC <input type="checkbox"/> Fair Hearing <input type="checkbox"/> Other:	5. DATE OF REQUEST: 03/24/2015	NEED RESPONSE BY: 03/31/2015
2. REQUESTOR NAME: Randy Mano	6. COUNTY/ORGANIZATION: San Francisco	
3. PHONE NO.: (415) 558-4128	7. SUBJECT: CFAPVUR action	
4. REGULATION CITE(S):	8. REFERENCES: <i>(Include ACL/ACIN, court cases, etc. in references)</i> <b>NOTE: All requests must have a regulation cite(s) and/or a reference(s).</b>  ACL 12-25, 12-25E, 13-17 SAR-7 (12/14)	

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

Q: If a non-indigent LPR client applies under CFAP but will roll to SNAP during the upcoming payment period, should the County wait until the following recertification to obtain sponsor information?

\* ACL 12-25, pages 66-67: "The changes in eligibility status listed below are considered county-initiated and these actions may occur at any time during the semi-annual period. They include, but are not limited to: ... CalFresh (contingent upon federal waiver approval): ... change from state funding California Food Assistance Program (CFAP) to federal SNAP which shall be seamless to the client."

\* MPP 63-405.126: "lawfully resided in the U.S. for five years beginning on the date of entry"

\* MPP 63-405.72: "providing the CWD at the time of application and at the time of recertification with any information and/or documentation necessary to determine the deemed income and resources of the noncitizen's sponsor"

\* SAR-7, question 13: "CalWORKs only: ... Citizenship or immigration status change"

10. REQUESTOR'S PROPOSED ANSWER:

A: Yes. Based on the recent change to SAR rules and SAR-7 question 13, immigration changes for CalFresh cases should not be addressed until the next recertification. The only mid-period client obligation is to report income over IRT. The client's immigration status is not VUR, as the County requires additional information to take action. The County should coordinate with the consortia to ensure that the proper funding is in place at the five-year mark (CFAP to SNAP), but no effort to request additional details from the client should be made.

11. STATE POLICY RESPONSE (CFPB USE ONLY):

The CDSS concurs with the County's response.

### FOR CDSS USE

DATE RECEIVED:

DATE RESPONDED TO COUNTY/ALJ:

A.B. 4/20/15

**CALFRESH (CF) PROGRAM  
REQUEST FOR POLICY/REGULATION INTERPRETATION (Continued)**

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