

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: 2/10/16	NEED RESPONSE BY: ASAP
2. REQUESTOR NAME: Alisa Rosas	6. COUNTY/ORGANIZATION: San Joaquin County Human Services Agency	
3. PHONE NO.: (209) 468-2043	7. SUBJECT: Expedited Services/New Discovery/Delayed ID	
4. REGULATION CITE(S): 63-301.533, 63-301.549, 63-301.541(a)	8. REFERENCES: <i>(Include ACL/ACIN, court cases, etc. in references)</i> NOTE: All requests must have a regulation cite(s) and/or a reference(s). ACIN I-14-11 (page 4)	

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

Is it correct to deny ES benefits when the applicant cannot verify identity within 3-day ES period, but process again as a late determination ES after the initial 3-day period if the applicant has provided verification of identity at a later time?

Example: Application date is Feb. 1; client is appears eligible to ES, but cannot provide verification of identity. EW gives client until 3rd day to provide verification of identity. Verification of identity was not provided within 3 days. On Feb. 9 applicant provides verification of identity with a collateral contact. On Feb. 11, EW approves new instance of Expedited Services as a late determination as it is discovered that the applicant is entitled to ES.

10. REQUESTOR'S PROPOSED ANSWER:

The example provided is within regulation guidelines as long as actions are well documented as to why initial ES application was not approved and why a late determination is completed as a new discovery. ACIN I-14-11 clearly states, "Only the applicant's identity is required to be verified to issue ES benefits." The EW is correct in their initial action to not approve ES without verification of identity. 63-301.549 states to process according to normal standards if not entitled to ES. 63-301.533 states that if CWD subsequently discovers that the HH is entitled to ES, the CWD shall provide expedited service to the HHs within the processing standards described in 63-301.531.

It is for the client's benefit that the EW process as a late determination after verification of identity is provided late.

11. STATE POLICY RESPONSE (CFPB USE ONLY):

CDSS concurs with the requestor's proposed response.

FOR CDSS USE

DATE RECEIVED: 2/10/16	DATE RESPONDED TO COUNTY/ALJ: 2/12/16 sm
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**CALFRESH (CF) PROGRAM
REQUEST FOR POLICY/REGULATION INTERPRETATION (Continued)**

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	6. COUNTY/ORGANIZATION:	
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4. REGULATION CITE(S):		