

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: 02/09/2016	NEED RESPONSE BY: 02/16/2016
2. REQUESTOR NAME: Andrea Saldana	6. COUNTY/ORGANIZATION: Riverside County	
3. PHONE NO.: 951-358-4144	7. SUBJECT: IEVS IFD Overissuances	
4. REGULATION CITE(S): ACL 15-95	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).	

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

A CF household is discovered to have unreported earnings through an IEVS report. Per ACL 15-95, "When establishing an OI, the OI is computed by determining the actual household circumstances, including changes the household failed to report. This includes decreases as well as increases in income."

When processing an OI, do we use actual income received by the household? For example, a household does not report in the data month \$400 earnings. The actual income received is \$400 in Jan, \$600 in Feb, \$800 in Mar, \$700 in Apr, \$500 in May, and \$800 in June. Do we use the respective amounts per month in the month?

10. REQUESTOR'S PROPOSED ANSWER:

Yes. Actual household circumstances include actual income received, therefore, we would use \$400 in Jan, \$600 in Feb, \$800 in Mar, \$700 in Apr, \$500 in May, and \$800 in June.

11. STATE POLICY RESPONSE (CFPB USE ONLY):

The information in ACL 15-95 is unclear for CalFresh purposes; therefore, CDSS disagrees with the county's proposed answer. Based upon ACL 12-25, Page 25, "Under SAR, recipients will no longer be required to report an exact amount of anticipated monthly income for each month of the SAR period. Instead, recipients will be required to provide information for the Data Month and any anticipated changes in the six months following the Submit Month." Since no income was reported for the data month, and since the actual income for the data month was \$400, the OI would be based upon the data month earnings of \$400.

FOR CDSS USE

DATE RECEIVED:

March 10, 2016

DATE RESPONDED TO COUNTY/ALJ:

April 8, 2016 (WEB) Revised May 4, 2016