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:

2. REQUESTOR NAME: Michelle Demetrius

3. PHONE NO.: (408) 755-7540

4. REGULATION CITE(S): WIC #11053.2

5. DATE OF REQUEST: 3/11/13

NEED RESPONSE BY: 3/18/13

6. COUNTY/ORGANIZATION: County of Santa Clara

7. SUBJECT: Inter County Transfer

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

ACL #11-22

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

ACL#11-22, Transfer of Non-Assistance CalFresh Cases (without Medi-Cal) (Page 5, last bullet) states, " When no member of the CalFresh household receives CalWORKs or Medi-Cal, the sending county shall discontinue responsibility for the provision of CalFresh benefits at the expiration of the transfer period." Based on this instruction, CalWIN is going to programmed to discontinue NACF cases at the end of the transfer period to avoid potential duplicate aid.
ACL 11-22 ICT Procedures (Page 3) states, "It is critical that CWDs communicate with each other throughout the ICT process to ensure that no case is terminated until the receiving counties has indicated taht the transfer has been completed to ensure that the household is not subject to an interruption in benefits."

Should the Sending County discontinue CalFresh at the end of the transfer period, even if the Receiving County has not pick up the ICT case?

10. REQUESTOR'S PROPOSED ANSWER:

Currently, the Medi-Cal ICT rule does not allow the Sending County to discontinue an ICT case until the county receives confirmation from the Receiving County. However, CalWORKs cases are discontinued at the end of the transfer period regardless of completion of the ICT process. Due to backlog and communication barriers among counties, the ICT process cannot be completed within the transfer period. Following the Medi-Cal ICT rule could create potential duplicate aid but following the CalWORKs rule could interrupt CalFresh benefits.

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

For Non-Assistance CalFresh cases (without Medi-Cal), per ACL 11-22, the sending county shall discontinue the responsibility for the provision of CalFresh benefits at the expiration of the transfer period which occurs at the end of the month following the 30-day transfer period. In addition, ACL 11-22 (page eight) states that counties are encouraged to utilize the electronic Inter-County Transfer (eICT) network which should ease the administrative burden of transferring cases between counties and from one consortium to another. ACL 11-22 does state that the sending county should not terminate a case until the transfer has been completed by the receiving county so as to ensure that the household is not subject to an interruption in benefits. Communication between the counties is critical. The only action required by the sending county should be to make sure the receiving county has received the ICT case and to not terminate benefits until such time.

FOR CDSS USE

DATE RECEIVED:	DATE RESPONDED TO COUNTY/ALJ:
3/11/13	3/14/13

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

1. RESPONSE NEEDED DUE TO:
   - ☐ Policy/Regulation Interpretation
   - ☐ QC
   - ☐ Fair Hearing
   - ☐ Other:

2. REQUESTOR NAME:

3. PHONE NO.:

4. REGULATION CITE(S):

5. DATE OF REQUEST:

NEED RESPONSE BY:

6. COUNTY/ORGANIZATION:

7. SUBJECT:

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