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. 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:
   - ☑ Policy/Regulation Interpretation
   - ☐ QC
   - ☐ Fair Hearing
   - ☐ Other:

5. DATE OF REQUEST: 6/5/12
   NEED RESPONSE BY: 6/15/12

6. COUNTY/ORGANIZATION: Department of Employment and Social Services

7. SUBJECT: School Exemption for Work Study

2. REQUESTOR NAME: Ken Mackell

3. PHONE NO.: 530-879-3528

4. REGULATION CITE(S): 63-406.212

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-05-08
   ACIN I-45-11
   ACIN I-45-11E

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

Per the regulations for school and work study it states this:
Be approved for state or federally financed work study for the current school term, as defined by the institution, and anticipate working during the term.

The statement above (Be approved and anticipate working during the term) is interpreted differently by staff and counties. Butte would like to know what anticipating working actually means. We would like it clearly define because this question comes up all the time and is debated over and over.
Does it mean they have to have a job lined up for the school term? What if the funds are not available? (However they are approved work study). What if there are never any work study jobs available? How long do we give them to verify they have started working.

10. REQUESTOR'S PROPOSED ANSWER:

Anticipate working means that at some point during the term there is a work study job available to the student and they must accept the job in order to meet student eligibility requirements.

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

In order to be eligible to participate in CalFresh, a student must satisfy one of the exemption criteria listed in Manual of Policies and Procedures (MPP) 63-406.21. As stated in MPP 63-406.212, if a student is approved for state or federally financed work study during a specific school term, anticipates working during that term, and has not refused a work assignment, that student can be eligible for CalFresh.

Anticipate working means the student expects to work irrespective of whether he/she is aware of an upcoming job or not. The fact that no jobs are available does not disqualify the student from receiving the exemption. Many students have to wait for a job opening and sometimes no job becomes available. If a job does not materialize, a student is not penalized. As long as the student doesn't refuse a job and is otherwise approved for work study, he/she remains eligible for the exemption at MPP Section 63-406.212.

FOR CDSS USE

DATE RECEIVED:	DATE RESPONDED TO COUNTY/ALJ: