

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:		5. DATE OF REQUEST:	NEED RESPONSE BY:
<input checked="" type="checkbox"/> Policy/Regulation Interpretation <input type="checkbox"/> QC <input type="checkbox"/> Fair Hearing <input checked="" type="checkbox"/> Other:		April 13, 2016	April 20, 2016
2. REQUESTOR NAME: Robin Zeno-Jackson		6. COUNTY/ORGANIZATION: Riverside County	
3. PHONE NO.: 951 358-4994		7. SUBJECT: Separate affidavit under penalty of perjury	
4. REGULATION CITE(S): ACIN I-45-11 pages 4 and 7		8. REFERENCES: (Include ACL/ACIN, court cases, etc. in references) NOTE: All requests must have a regulation cite(s) and/or a reference(s). MPP 63-300.5(e)(5)(A),	
9. QUESTION: (INCLUDE SCENARIO IF NEEDED FOR CLARITY):			

CDSS previously clarified that self-certification is completed on a separate affidavit in addition to information reported on the application or SAR 7. That an affirmative answer on the SAR 7 or the application does not constitute verification. CDSS, Field Operations, has cited Riverside County during ME reviews for over-verifying Residency when homeless households are requested to self-certify the household's circumstances when they have listed homeless as their address on the CalFresh Application. FOB cited MPP 63-300.5(e)(5)(A). These regulations state that when verification of Residency does not exist, reasonable efforts have been made to obtain verification, and information is not questionable, document the case that verification of Residency cannot be obtained and proceed with the certification. However, ACIN I-45-11, instructs counties to allow homeless households to self-certify when reasonable efforts have been made to verify Residency. Based on the examples in ACIN I-45-11, household's are generally required to complete a separate affidavit to self-certify. Is the customer's statement of homelessness written on the application an exception to the rule?

10. REQUESTOR'S PROPOSED ANSWER:

Counties can request households that write homeless as their address on the application, to complete a separate self-certification affidavit regarding the household's homeless circumstances and Residency.

11. STATE POLICY RESPONSE (CFPB USE ONLY):

If a household writes "homeless" as their address on the application, and the household's attestation is questionable, a county may request a separate affidavit regarding the household's circumstances and residency.

Per ACIN 1-45-11, to be considered questionable the information on the application must be inconsistent with statements made by the applicant and/or inconsistent with information received by the CWD. In the case of homeless households verifying residency, if the information provided is questionable, the county may proceed with self-certification.

(Continued on Page 2)

FOR CDSS USE

DATE RECEIVED:

April 19, 2016

DATE RESPONDED TO COUNTY/ALJ:

May 16, 2016 (WEB) revised 7-20-16

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

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	6. COUNTY/ORGANIZATION:	
	7. SUBJECT:	
2. REQUESTOR NAME:	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).	
3. PHONE NO.:		
4. REGULATION CITE(S):		

STATE POLICY RESPONSE (CFPB USE ONLY):

(Continued from Page 1)

If the household's attestation is not questionable, per MPP 63-300.5(e)(5)(A), if the applicant, with the county's assistance, has made reasonable efforts to obtain verification and verification cannot be obtained and the applicant's statement regarding residency is not questionable, self-certification is acceptable, and the county may proceed with certification if the household is otherwise eligible.

A separate affidavit is not required for self-certification. The application itself, signed under penalty of perjury, provides and is sufficient for self-certification of homelessness.