

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: 1/5/2016	NEED RESPONSE BY:
2. REQUESTOR NAME: Ronna Bucelli	6. COUNTY/ORGANIZATION: Marin	
3. PHONE NO.: (415) 473-3503	7. SUBJECT: Student Eligibility AB 1930 WIOA 01.08.16	
4. REGULATION CITE(S): 63-406.11, .111(a); 63-406.216; 63-406.216 (a)	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-89-15, ACL 15-70	
9. QUESTION: (INCLUDE SCENARIO IF NEEDED FOR CLARITY):		

ACL 15-70 states that a student enrolled in a WIOA activity shall be considered eligible for CalFresh if all other conditions of eligibility are satisfied. WIOA in Marin offers different levels of service. An individual can register for career services with WIOA and attend workshops and use the Career Resource Center; etc., or the individual could be enrolled and included in performance outcomes, they would be assigned individual case managers, and they could be eligible to have paid vocational training, etc. An actual enrollment is not something WIOA can easily promise for all clients who might otherwise be eligible for CalFresh.

Would a student "registered" for career services through WIOA be exempt from the student eligibility rules?

10. REQUESTOR'S PROPOSED ANSWER: According to 63-406.216 the student must be assigned to or placed in an institution of higher learning through or in compliance with the requirements of Sections 63-406.216(a) through (e). 63-406.216 (a) is JTPA (WIOA supersedes JTPA). Additionally: Self-initiated placements (in an institute of higher education) during the period of time the person is enrolled in one of the employment and training programs as specified in Sections 63-406.216(a) through (e) shall be considered to be in compliance with the requirements of the employment and training program in which the person is enrolled, provided that the program has a component for enrollment in an institution of higher education and that program accepts the placement. Answer: If a student who is "registered" for career services through WIOA is considered "enrolled in a WIOA activity", they meet the criteria of an eligible student and are eligible for CalFresh if all other conditions of eligibility are satisfied.
11. STATE POLICY RESPONSE (CFPB USE ONLY):

Yes, according to ACL 15-70 "a student enrolled in a WIOA activity shall be considered as eligible for CalFresh if all other conditions of eligibility are satisfied."

FOR CDSS USE

DATE RECEIVED: January 5, 2016	DATE RESPONDED TO COUNTY/ALJ: January 8, 2016sc
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**CALFRESH (CF) PROGRAM
REQUEST FOR POLICY/REGULATION INTERPRETATION (Continued)**

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3. PHONE NO.:		
4. REGULATION CITE(S):		