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### I. Update

This handbook has been updated to mirror guidance outlined in the new CalFresh Student Eligibility Handbook Version 2.0. Updates to the handbook include:

- Clarifying student status definition
- Guidance on meal plans for students who commute or live off campus
- Updated the definition regarding half time enrollment
- Reformatted the student eligibility rule exemption section
- Updated guidance regarding Cal Grant A and B
- Added a new section on tracking exemptions
- Updated the student income section
- Added Form CF 6177 CalFresh Student Exemption Screening Form for staff to use

All updates are highlighted in purple.

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## II. Summary

This handbook provides guidance on how to apply student eligibility rules for the CalFresh program, including screening for all possible student exemptions.

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## III. General

Assembly Bill 1930 mandated that the California Department of Social Services (CDSS) in conjunction with community colleges, universities, county Social Services offices, student advocates and clients establish a procedure to identify any possible exemptions to student eligibility rules.

**Note that California no longer requires verification of exemptions from the student eligibility rule unless questionable or in cases where a student's physical or mental unfitness is not evident.** See [Section VII of this Handbook](#) for details. Student eligibility rules shall be applied on the date of the interview to all applicants who present as students.

### **Begin Date of Student Status**

Student status is when an individual is determined to be a student for CalFresh purposes. Student status shall be reported and determined at application and at recertification. Student status shall begin on the first day of the school term and continue through regular school breaks, unless the student graduates, drops out, is suspended, expelled, or does not intend to register for the next normal school term (excluding summer school).

Note: While student status is required to be determined at application and recertification, students are not required to report changes to their student status at mid-period. If a student voluntarily reports a change of student status at mid-period, ESTs shall not take action if the change will result in a decrease of benefits, including ineligibility. ESTs shall send the household a No-Change NOA and document the mid-period report in a CalSAWS journal entry and to follow-up on student status at recertification.

However, if the mid-period report of student status will positively benefit the household, such as gaining eligibility and increasing the benefit amount, ESTs shall act on the reported change, including requesting for any missing mandatory verification, effective with timely notice (10 days) of the change.

### **Summer Enrollment**

Individuals who submit an initial application for benefits in the summer, prior to the start of their first official day of the regular school term, are not considered to have student status. As a result, they are not subject to the student eligibility rule at the time of application. Their student status will not be reassessed until recertification. At recertification, so long as the student remains in school and registered (or plans to register for the following school term), will be considered a continuing student who is subject to the student eligibility rule.

Continuing students are subject to the student eligibility rule during regular school breaks because they were already classified as a student.

#### *Example 1*

*Applicant graduated from high school on 6/10 and applies for CalFresh on 8/17. College classes begin on 8/30. Because the client applied before the first day of classes and was not already a student at an institution of higher education, the applicant is not considered a student and does not need to meet the student eligibility rule at initial application. The client will be subject to student status at recertification so long as they continue to remain a student and are planning to attend the next normal school term.*

#### *Example 2*

*Applicant graduated from high school on 6/10/2024 and attends college in the fall. The next summer, during summer break, the student applies for CalFresh on 7/10/2025. The student is enrolled for and plans to attend classes the following Fall Semester. Because the student is a continuing higher education student and plans to attend the following semester, the applicant is considered a student at initial application and is subject to the student eligibility rule.*

### **Half-Time Enrollment**

For the purposes of determining CalFresh student eligibility, a student shall be determined to be attending at least half-time any semester or term in which they enroll in at least half of the number of credits needed each semester or term to graduate within four years of enrollment as a first-time freshman, or within two years of enrollment as a transfer student.

The number of credits needed to meet the definition of half-time will vary by institution and as a result, Eligibility Services Technicians (ESTs) shall refer to the [Alameda County Institutions of Higher Education list](#) for a non-exhaustive list of institutions of higher education in Alameda County or check the institution's website for their definition of half time student status.

If a student has not chosen a major, ESTs must base the half-time calculation on the minimum number of credits required for the student to obtain a General Education Bachelor of Arts degree at that institution of higher education.

Individuals enrolled less than half-time are **not** considered students for CalFresh purposes and therefore are not subject to the student eligibility rule.

### **Graduate Students**

For CalFresh, there is no differentiation between graduate students and undergraduate students. Both are defined using the same criteria for student status mentioned above. There are no specific exclusions for graduate students.

### **Veteran Students**

Like undergraduate and graduate students, students who are veterans are not treated any differently when applying for CalFresh. There are no specific exclusions for students who are veterans.

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#### IV. Institutions of Higher Education

An **institution of higher education** refers to:

1. A business, trade, technical or vocational school that normally requires a high school diploma or equivalency certificate for enrollment **in the curriculum**; or
2. A **regular curriculum\*** at a community college or state or university that offers degree programs regardless of whether a high school diploma is required.

**Note:** If a college/university normally requires a high school diploma or equivalency certificate but does not require it for either a particular course or program, the college/university would not be considered an institution of higher education (e.g., ESL classes, GED classes).

**\*A regular curriculum is defined as the standard requirements that must be completed for graduation, certification, or qualification in a particular field of study.**

See [Alameda County Institutions of Higher Education list](#) for a non-exhaustive list of institutions of higher education in Alameda County.

##### **Student Meal Plans**

CalFresh cannot be used to pay for college cafeteria meal plans. Students who live in dormitories and receive **more than half of their 21 meals per week** from a meal plan (11 meals or more per week), **whether purchased or provided at no cost, are considered residents of an institution and are not eligible for benefits.** However, if a student purchases a meal plan that provides them with **half or fewer of their meals**, they **are not considered residents of an institution** and may be eligible for CalFresh benefits as long as they also satisfy one of the student exemptions and meet all other eligibility requirements.

**Note:** Students who live off-campus and/or commute are **not** considered residents of an institution. These students are potentially eligible for CalFresh, even if they have a meal plan that provides more than half of their daily meals.

##### **Adult Education Programs**

The CalFresh student eligibility rules and exemptions do not apply to students who are enrolled in **non-regular curriculums, including adult education programs, remedial education, continuing or community education, professional development, English for Speakers of Other Languages, and workforce development/training programs.** Enrollment in K12 adult schools and community college non-credit classes do not require a high school diploma or equivalency certificate. **Courses that do not provide credits towards college graduation are considered non-credit courses and do not count towards enrollment of half time or more.** Therefore, these programs are not considered institutions of higher education as defined by CalFresh and students attending these programs are not subject to the student eligibility rule.

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## V. Exemptions From the Student Eligibility Rule

**California no longer requires verification of exemptions from the student eligibility rule unless questionable or in cases where a student’s physical or mental unfitness is not evident.** See [Section VII of this Handbook](#) for details and examples of when verification should be requested. ESTs may also use [Form CF 6177 CalFresh Student Exemption Screening Form](#) to help identify all student exemptions a student meets.

For a student to be eligible for CalFresh, the student must meet the criteria for at least one of the following exemptions on the date of the application interview or recertification interview. Once an exemption has been established, the exemption typically will apply through the length of the certification period, except for the exemptions based on work hours and work study, or if the individual reports a change in their student status.

While only one exemption is needed to qualify a student for CalFresh, ESTs shall document in CalSAWS journal entries, all exemptions the student qualifies for. If the student loses an exemption, ESTs shall assess whether the student meets the criteria for another exemption before taking any negative action.

### A. Age

A student who is age 17 or younger or age 50 or older meets the criteria for an exemption from the student eligibility rule.

### B. Disabled

Students who receive disability income such as Social Security Disability, Supplemental Security Income (SSI), Veterans Disability, Worker’s Compensation, State Disability Income (SDI), or other disability-based income, meet the definition of being physically or mentally unfit to work. The disability must be expected to last more than 30 days.

### C. Physically or Mentally Unfit to Work

For the purposes of student exemption, the definition of physical or mental unfitness to work aligns with the Able-Bodied Adult Without Dependents (ABAWD) definition of unfitness. An individual is considered medically certified as physically or mentally unfit to work if they have a temporary or permanent illness, disability, condition, or life circumstance that reduces or affects their ability to work. The physical or mental condition must make an individual unfit to work an average of 20 hours per week or on an ongoing basis and is not limited to being unfit to work at all.

Students who do not receive disability-based income but are unable to work due to a physical or mental condition, must provide verification of the inability to work from a third-party source if the student’s unfitness is not apparent. Like ABAWD time limit rules, indicators of apparent unfitness to work include, but are not limited to, chronic homelessness, struggling with drugs or alcohol, and having experienced domestic violence. If unfitness is not apparent, verification is required and a client statement or sworn statement will **not** suffice.

Verification can be provided by a medical professional, including but not limited to, a physician, nurse, psychologist, or psychiatrist. Other professionals who are not medical professionals, but

assist clients in case management or other services, such as a Behavioral Health Case Manager or Regional Center Case Manager, may also provide verification.

When third party verification is unavailable, EST observation noted in CalSAWS journal entries can also be used as verification. When possible, ESTs shall assist the client in obtaining verification for this exemption.

**D. Receipt of a Temporary Assistance for Needy Families (TANF) or CalWORKs Funded Benefit**

A student receiving a TANF-funded (cash or non-cash) benefit meets the criteria for this exemption from the student eligibility rule. This includes:

- California Work Opportunity and Responsibility to Kids (CalWORKs)
- Tribal TANF
- TANF-Funded Cal Grant A or B
- Any other program funded with the TANF block grant under Title IV of the Social Security Act (including but not limited to the Job Opportunities and Basic Skills (JOBS) program under Title IV of the Social Security Act, succeeded by TANF)\*

\*the JOBS program was succeeded by TANF. Any student participating in a job training program as a result of participation in TANF or CalWORKs, is exempt from the student eligibility rule.

***Receipt of a TANF-Funded Cal Grant A or B***

TANF funds are allocated to the California Student Aid Commission (CSAC) in order to issue Cal Grants to low-income college students who meet CalWORKs eligibility requirements. The student must be:

- a. Currently unmarried;
- b. 25 years of age or younger; and
- c. Have parental and/or student income of \$50,000 a year or less.

Note that CSAC may have additional eligibility requirements not listed. These additional eligibility criteria are used by CSAC to determine whether a student is eligible to receive a Cal Grant. Students without qualifying citizenship status may be approved for a Cal Grant A or B but will not receive TANF funding for the Cal Grant. Therefore, their receipt of the Cal Grant does not qualify them for an exemption from the student eligibility rule.

There are three types of Cal Grants available to students:

1. Cal Grant A provides tuition and fee assistance;
2. Cal Grant B contains two components:
  - a. Cal Grant B provides tuition and fee assistance
  - b. Cal Grant B Access provides assistance to cover the cost of books/supplies and other college expenses; and
3. Cal Grant C provides assistance to students pursuing an occupational or technical program. Receipt of a Cal Grant C award does not exempt a student from the student eligibility rule.

Receipt of a TANF-funded Cal Grant A or B may be used to determine if a student meets the criteria for an exemption from the student eligibility rule. CSAC also provides Cal Grants to students who do not meet the TANF or CalWORKs eligibility requirements, therefore ESTs should not assume that the Cal Grant A or B received by a student is TANF-funded. If verification

is needed to establish this student exemption, refer to Section VII. Student Verification below for examples of verification.

### ***California Community Colleges (CCCs) and Cal Grants***

Cal Grants A or B provide tuition and fee assistance for students who attend a “tuition charging institution.” Students with low-income do not pay tuition at any CCC as a result of fee waiver programs. Therefore, the CCCs are not considered tuition charging institutions for the purposes of establishing Cal Grant eligibility. Students with low income who attend a CCC and meet the CalWORKs eligibility requirements are **not** eligible to receive tuition and fee assistance through Cal Grant A or B while attending a CCC.

Most students who attend a CCC can only receive the Cal Grant B Access component and therefore, do not meet the criteria for this exemption from the student eligibility rule. A student with low income who attends a CCC may be eligible for a TANF-funded Cal Grant A or B, if and when the student transfers to a four-year, tuition charging institution of higher education.

### ***Exception for CCCs Offering a Baccalaureate (BA) Degree***

Beginning in Fall of 2017, some CCCs have been approved to offer a BA degree in the area of health, science, or technology not already offered at a California State University (CSU), or a University of California (UC), and charges a per unit fee. A small population of CCC low-income students eligible for a TANF-funded Cal Grant A or B and participating in the BA Degree Pilot Program is charged tuition and may receive tuition and fee assistance through a TANF-funded Cal Grant A or B while attending the CCC.

Students participating in the CCC BA Degree Pilot Program who have received tuition and fee assistance through a TANF-funded Cal Grant A or B will also receive written notification from CSAC as verification. This is an exception to the students attending a CCC and are participating in the BA pilot program to meet an exemption from the student eligibility rule.

## **E. Paid Work**

A student who is enrolled at least half-time in an institution of higher education and paid for employment, working an average of 20 hours per week or an average of 80 hours per month, or if self-employed, working an average of 20 hours per week or an average of 80 hours per month and receiving weekly earnings at least equal to the Federal minimum wage multiplied by 20 hours weekly, meets the criteria for an exemption from the student eligibility rule.

### ***Determining Average Hours Worked***

The sum total hours will not be used to determine if the student meets the paid work exemption. Hours must be averaged using the multiplier 4.33 or the number of weeks in the year.

- *Example 1 – Using the 4.33 multiplier*  
*A student provides their most recent pay stubs showing they work 19 hours per week. Even though the student does not work 20 hours per week, they do work more than the average of 80 hours or more each month. The student is eligible for the paid work exemption.*

*Average hours: 19 hours per week X 4.33 = 82.77 hours per month*

- *Example 2 – Using number of weeks in the year*  
*A student provides their previous month's pay stubs showing they work 16 hours per week. This student does not work an average of 20 hours per week and does not maintain an average of at least 80 hours per month. The student is not eligible for the paid work exemption.*

*Average hours: 16 hours per week X 52 weeks per year = 832 hours per year / 12 months = 69.33 hours per month.*

**Note:** the 4.33 multiplier or averaging over the number of weeks in a year, is used to account for the varying lengths of months over the year. Students who work a sum total of 80 hours in a single month, but who will not maintain an average of at least 80 hours each month, are not eligible for the paid work exemption.

### **Reported Changes to Work Hours**

Under SAR reporting rules, a change in student work hours is not a mandatory mid-period report. If the student does not report a change in work hours during the certification period, the student meets the criteria for an exemption from the student eligibility rule through the length of the certification period.

If the student reports a change in work hours at SAR, ESTs are required to determine if the change in work hours averages to 20 hours per week or an average of 80 hours per month to continue applying the exemption. If the change in work hours does not average to 20 hours per week or 80 hours per month, ESTs shall determine if the student meets the criteria for another exemption from the student eligibility rule or if they are no longer eligible for CalFresh.

If the student voluntarily reports a change in income mid-period and the change in income is verified, ESTs shall also evaluate their continuing CalFresh eligibility. While the EST is acting on the verified change in income, it may become known to the EST that the student no longer meets the work hours exemption criteria. In this scenario, the EST shall determine whether the student meets the criteria for another exemption from the student eligibility rule or if the student is no longer eligible for CalFresh.

## **F. Work Study**

A student is eligible for the work study exemption if they have been approved, awarded, or accepted for state or federally financed work study for the current school term (as defined by the institution) and anticipate working during the term.

### **Length of Exemption**

The exemption begins the month the school term starts, or the month work study is approved, whichever is later and continues until the end of the month in which the school term ends, or it becomes known the student has refused a work study position.

The exemption shall not continue between school terms when there is a full month break or longer, unless the student is engaged in work study during the break. A break or end of work study is not a mandatory mid-period report. Assessment of whether a student is participating in work study, for the purpose of determining whether the individual is an eligible student, may

only be initiated at SAR and recertification. If the student is not participating in work study, the student may be ineligible for CalFresh unless they meet another exemption.

### ***Anticipating Work***

For the purposes of determining CalFresh eligibility, a student is considered “anticipating participation” in work study if they “can reasonably expect or foresee being assigned a work study job, and a student shall be deemed to be ‘anticipating participation’ in work study until they receive notices from the institution of higher education that they have been denied participation in work study.” Furthermore, a student meets this criteria for this exemption if the work study position has not yet begun or is not yet available. A student can fairly anticipate that they will be offered a work study position until they receive a notice of denial. If a work study position does not open up during the term, the student is not penalized. If during the interview, a student is approved for work study, but states that they do not anticipate accepting a work study position if offered, ESTs shall enter a journal entry, detailing the client’s statement and deny the student for this exemption.

A student who is denied work study due to funding limitations does not meet the criteria for an exemption from the student eligibility rule. A student must officially be approved for work study. Eligibility for work study without official approval is insufficient for a student to meet the criteria for an exemption.

### **G. Parental Control for a Child Under Age Six**

A student who is exerting parental control over a dependent household member under the age of six meets the criteria for exemption from the student eligibility rule.

Only one parent can claim the exemption as the primary person responsible for the care of a dependent child under the age of six. However, in cases with multiple children, ESTs shall determine each application on a case-by-case basis, explore the reason if one of the parents is unable to care for both children or the reason that each parent is “responsible” for each child.

### **H. Parental Control for A Child Under Age Twelve Without Adequate Child Care**

A student who is exerting parent control over a dependent household member who:

- Has reached age six, but is under age twelve, and
- The EST has determined on a case-by-case basis that adequate child-care services are not available to enable the individual to attend class and work an average of 20 hours per week or an average of 80 hours per month\*, or
- Participate in a state or federally financed work study program during the regular school year,

meets the criteria for an exemption from the student eligibility rule.

\*Situations where adequate childcare services are not available may include the following:

- Childcare provider hours do not coincide with the student’s employment hours or potential employment hours, or
- The distance between the student's home, school, place of employment and childcare prevents the student from meeting his/her school or employment schedule, or
- Available childcare services do not meet the age and/or special needs of the child.

Only one parent can claim the exemption as the primary person responsible for the care of a dependent child who has reached age six but is under age twelve and adequate childcare services are not available. If there is more than one child under age twelve, ESTs shall explore the reason if one of the parents is unable to care for both children or the reason that each parent is “responsible” for each child.

**I. Single Parent Responsible for Child Under Twelve**

A student enrolled full-time in an institution of higher education and who is a single parent with responsibility for the care of a dependent child under age 12 meets the criteria for an exemption from the student eligibility rule.

This exemption is applied when only one of the child’s natural, adoptive, or stepparent, regardless of marital status, is in the same CalFresh household as the child. If no natural, adoptive, or stepparent is in the same CalFresh household as the child, another full-time student in the same CalFresh household as the child may qualify for this exemption if they have parental control over the child and their spouse is not part of the CalFresh household.

**J. Attending School as Part of an Employment and Training Program**

A student who is assigned to, or place in, an institution of higher education through or in compliance with one of the requirements listed below, meets the criteria for an exemption from the student eligibility rule:

- a. Workforce Innovation Opportunity Act (WIOA)
- b. CalFresh Employment and Training (E&T) Program
- c. Programs under Section 236 of the Trade Act of 1974
- d. State or local government E&T programs for individuals with low income, providing at least one of the components lists below:
  - Job retention,
  - Job search,
  - Job search training,
  - Work experience,
  - Workfare,
  - Vocational training,
  - Self-employment training,
  - On-the-job-training, or
  - Education.

Self-initiated placements during the period of time the person is enrolled in one of the E&T programs as specified in the list above must be considered to be in compliance with the requirements of the 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.

***Workforce Innovation and Opportunity Act (WIOA)***

The purpose of WIOA-funded activities is to promote an increase in the employment, job retention, earnings, and occupational skills improvement by participants. Therefore, a student enrolled in a WIOA activity meets the criteria for an exemption from the student eligibility rule.

### ***Local Programs that Increase Employability (LPIE)***

Participation in a state or local program that increases employability also exempts students from the student eligibility rule. To be defined as a part of a program to increase the student's employability, a student must participate in a program which assists in gaining the skills, training, work, or experience, that will increase the student's ability to obtain regular employment. This includes programs for students with low-income that are operated by a state or local government where one or more of the components of the program are equivalent to an E&T component.

**For a non-exhaustive list of Approved LPIEs, refer to CDSS's CalFresh Resource Center Policy Guidance webpage [here](#).**

In addition to the programs listed, there may be other state-funded programs that are referred to locally by another name, or programs that are locally funded and provide education components with the goal of increasing employability.

### ***General Programs Identified***

In addition to individual LPIE program identification, the CCCs, CSUs, and UCs have identified two general programs which meet the criteria for an LPIE. All campuses may have students participating in one or both of the general programs below.

- **Campus Employment Program:** Students employed by their campus or a recognized auxiliary organization are considered to be participating in a Campus Employment Program. For LPIE purposes, an auxiliary organization must be overseen by the CCC, CSU, or UC, and must serve the institution of higher education.
  - Students enrolled in this program do not need to be working an average of 20 hours per week or a total of 80 hours per month to meet the criteria for an exemption to the student eligibility rule as LPIEs do not have a minimum hour requirement.
- **Research and Teaching Assistantship Program:** Students hired for a research or teaching assistant position, whether paid or unpaid, or part of a training program, are considered to be participating in a Research and Teaching Assistantship Program.

### ***Removal of LPIEs at Private Institutions***

As an LPIE must be operated by a state or local government, effective September 1, 2022, all previously approved programs that are not operated by a CCC, CSU, or UC have been removed from the list of approved LPIEs.

Students newly applying for CalFresh may no longer use enrollment in a private school LPIE as an exemption. Students receiving CalFresh due to being enrolled in a private school LPIE will continue to remain exempt from the student eligibility rule for the length of their certification period. Student eligibility status shall be reassessed during the student's next recertification to see if they meet another exemption before determining the student to be ineligible.

### ***Reassessment of Previously Approved Statewide Programs***

Effective September 1, 2022, the automatic approval of most state-funded and foster youth programs has been removed and will need to be individually identified by counties, campuses, or the local program and approved by CDSS. These programs include:

- Chafee Education and Training Voucher (ETV) Program
- Cooperating Agencies Foster Youth Educational Support (CAFYES)

- Cooperative Agencies Resources for Education (CARE) Program
- Disabled Students Programs and Services (DSPS) and Student Academic Services (SAS)
- Educational Opportunity Program (EOP)
- Extended Foster Care (AB 12/AB 212)
- Extended Opportunity Programs and Services (EOPS)
- Foster Youth Success Initiative (FYSI)
- Guardian Scholars Program
- Mathematics, Engineering, Science Achievement (MESA) Program
- McNair Scholars Program
- Unaccompanied Refugee Minors (URM) Program

### **CalFresh E&T Activities**

Participating in any CalFresh E&T activity, which can be through Alameda County Social Services Agency (ACSSA) CalFresh E&T, CalFresh E&T service providers, or any of the following CalFresh E&T 3<sup>rd</sup> Party Partner Service Providers:

- [Building Opportunities for Self-Sufficiency \(BOSS\)](#)
- [Center for Employment Opportunities \(CEO\)](#)
- [Chabot College](#)
- [Civicorps](#)
- [Covenant House California](#)
- [Fremont Adult School](#)
- [iFoster](#)
- [Rising Sun Center for Opportunity](#)
- [Roots Community Health Center](#)
- [Safe Passages](#)
- [The Bread Project](#)

Refer to the [CalFresh E&T Referral Guide](#) and [CalFresh Employment and Training Handbook 90-2.40](#) for more information about CalFresh E&T 3<sup>rd</sup> Party Partner Service Providers.

### **K. Does Not Expect to be Enrolled Next Term**

A student who does not expect to be enrolled in the next school term, due to the student graduating, suspension or expulsion, dropping out, or not intending to register for the next normal school term (excluding summer school) is not subject to the student eligibility rule.

*Example 1: If a student applies in February, but states that they plan to graduate in June, then the student is not subject to the student eligibility rule.*

*Example 2: If a student applies in March but states they do not plan to return to school in the fall, then the student is not subject to the student eligibility rule.*

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## VI. Tracking Student Exemptions

In order to properly track student exemptions in CalSAWS, various entries within the system must be completed in the Demographics, Income, and/or School detail pages.

The table below lists the student exemptions provided on the [Form CF 6177 CalFresh Student Exemption Screening Form](#) and CalSAWS location for each exemption.

<b>Exemption</b>	<b>Exemption Location in CalSAWS</b>
Enrolled less than half-time	CalSAWS School Attendance Enrollment detail page reflects students is enrolled less than half-time
Taking only non-credit courses	CalSAWS School Attendance select Vocational as institution type
Age 17 or younger	CalSAWS Individual Demographic detail page
Age 50 or older	CalSAWS Individual Demographic detail page
Approve for work study (even if a work study job has not yet begun or is not available), anticipates working, and have no refused a work study assignment	CalSAWS Income detail page for student reflects Work Study income (\$0 entry may be used when assignment is not active)
Received a TANF-funded Cal Grant A or B in the last 12 months	CalSAWS Income detail page reflects the exemption
Working an average of 20 hours per week or an average of 80 hours per month	CalSAWS Employment detail page reflects current employment average hours of 20 hours per week or average of 80 hours per month
Disabled	<ul style="list-style-type: none"> <li>CalSAWS Income detail page includes income from Social Security Administration (SSA)</li> <li>CalSAWS Other Program Assistance page details SSI/SSP</li> <li>CalSAWS Medical Condition detail page indicating disability that is verifiable and permanent or expected to last at least 30 days</li> </ul>
Physically or mentally unable to work	CalSAWS Medical Condition detail page indicating a physical or mental unfitness for work
Does not expect to be enrolled next term	CalSAWS School Attendance Enrollment detail page reflects student is not currently enrolled
Responsible for the care of a household member under the age of 6	CalSAWS Individual Demographic detail page shows Date of Birth field reflecting child under age 6 who is indicated on the Relationship detail page to be under the care of the student
Responsible for the care of a household member under the age of 12 without adequate childcare	<ul style="list-style-type: none"> <li>CalSAWS Individual Demographic detail page shows Date of Birth field reflecting child over age 6 and under age 12 who is indicated on the Relationship detail page to be under the care of the student, and</li> <li>The School Attendance detail page reflects adequate childcare is not available</li> </ul>

A single parent responsible for the care of a household member under the age of 12	CalSAWS Individual Demographic detail page shows Date of Birth field reflecting child under age 12 who is indicated on the Relationship Detail page to be under the care of the student and a second parent is not in the household as indicated by the Relationship Detail page
Receiving CalWORKs or Tribal TANF	<ul style="list-style-type: none"> <li>• CalWORKs Program block in Active Status</li> <li>• CalSAWS Other Program Assistance detail page with Tribal TANF entry</li> </ul>
Participating in CalFresh E&T	<ul style="list-style-type: none"> <li>• CFET program block in Active status, <b>or</b></li> <li>• CalSAWS School Attendance detail page reflects the exemption</li> </ul>
Enrolled in a WIOA	CalSAWS School Attendance detail page reflects the exemption
Enrolled in an On-the-job training program	CalSAWS School Attendance detail page reflects the exemption
Enrolled in an Approved LPIE	CalSAWS School Attendance detail page reflects the exemption

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## VII. Student Verification

**California no longer requires verification of exemptions from the student eligibility rule unless questionable or in cases where a student’s physical or mental unfitness is not evident.**

**Important: This guidance does not alter the need to verify a household’s gross nonexempt income, including any applicable educational assistance (i.e., financial aid). Receipt of certain types of educational assistance or student-related income may indicate that the student meets an exemption from the student eligibility rule. While the exemption is no longer a mandatory verification, income must be verified for purposes of determining the household’s income eligibility for CalFresh.**

To be considered questionable, the information on the application must be inconsistent with statements made by the applicant and/or inconsistent with other information received. When verification is required to resolve questionable information, the EST shall document why the information was considered questionable, where in the case file the inconsistency exists, and what documentation was used to resolve the questionable information.

### *Example*

*A student applying for CalFresh indicates on their BenefitsCal application that they are participating in work study. As part of income verification, the student provided a copy of their financial aid award letter which did not indicate any awarded work study for the current school term. The student’s claim of meeting the work study exemption is considered questionable and the student does not meet any other exemptions. The EST issues a CW 2200 to the client to provide verification of work*

*study. If the client provides verification, the student can be granted the work study exemption, otherwise the student is ineligible for CalFresh.*

If exemptions are questionable and requested verification is not available, a sworn statement or an affidavit is acceptable. The sworn statement and/or affidavit should only be used in situations where the household is unable to provide verification of the exemption through documentation or collateral contract. As a reminder, a sworn statement and/or affidavit is not an acceptable form of verification when a student's physical or mental unfitness is not evident. Refer to Section III. Eligible Student and Exemption Criteria, subsection **Inability to work because of a physical or mental unfitness** for verification requirements.

If verification of an exemption is requested, [refer to the example of acceptable verifications listed below](#):

#### **Approved for State or Federal Work Study**

- A work study [approval](#) or award letter [from the financial aid department](#).

#### **Receipt of Cal Grant A or B**

- A copy of a student's California Aid Report, which is an award letter provided to students by the CSAC, and/or
- A printout of the award confirmation from a student's college web grant account.

Attached [TANFC1 Sample 4.18](#) is a sample copy of the TANF-funded Cal Grant A or B award letter provided by CSAC.

**NOTE:** Not every student who receives a Cal Grant A or B receives TANF-funded Cal Grant A or B. If a student's Cal Grant A or B is not TANF-funded, CSAC will not provide the written notification.

#### **Verifications of Grants and Loans**

Obtain written verification of the student financial aid from either the student's financial aid award letter or the attending school's financial aid office if the student exemption claim is questionable. The verification must include the following information:

- Verification of the type of grants and loans;
- Verification of the amount of the grants and loans;
- Verification of the expenses it is intended to cover; and,
- Verification of the period the grants and loans are intended to cover.

If grants and loans are verified, but the deductions are not available, the non-exempt grants and loans should be prorated over the period they are intended to cover and applied as income to the CalFresh budget.

#### **Verification of Participation in a CalFresh E&T Program**

If a student states, verbally or in writing, that they are enrolled in one of the CalFresh E&T programs listed above, that is sufficient information for ESTs to exempt the student unless it is questionable. If the information provided by a student is questionable, acceptable verification can include but is not limited to:

- For CalFresh E&T participants in an employment services activity hosted by an ACSSA Career Pathways Employment and Training (CPET) center at an ACSSA office or Limited English Proficient (LEP) service provider:
  - Their current CFET program status is Approved in CalSAWS, and they have an Employment Counselor (EC) assigned to their CFET program, or
  - Recent case comments from an EST, EC, SW, or Service Provider show that the client is participating in CalFresh E&T, or CFET, or recently volunteered to participate.
- For CalFresh E&T participants in an off-site activity with a 3<sup>rd</sup> Party Partner Service Provider:
  - The client provides a document that shows their participation in employment services or education activity with the service provider. This can include but is not limited to:
    - A printout of their current enrolled classes.
    - A statement from the service provider.
    - A Fresh Success Pre-Enrollment Form.
    - An enrollment verification form, such as **Form 90-258 CalFresh E&T Verification of CalFresh Student Exemption Eligibility**.

#### Verification of LPIE

To the extent possible, students enrolled in an LPIE will be notified by their campus that they meet the criteria for an exemption to the student eligibility rule. If a student states, verbally or in writing, that they are enrolled in one of the programs listed on the list of approved LPIEs, that is sufficient information for ESTs to exempt the student unless it is questionable. If the information provided by a student is questionable, acceptable verification can include but is not limited to:

- A transcript,
- An email from the instructor's school email address,
- Verbal affirmation from a campus official, or
- Targeted outreach emails from campuses to LPIE enrollees.

If a program does not appear on the list of approved LPIEs, the ESTs shall explore if the student is enrolled in another LPIE or meets the criteria for another exemption before determining the student to be ineligible.

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### VIII. School Expenses

School expenses from an institute of higher learning are verified on the award letter received from the school for the student. Each school uses a standard student expense budget which has set allowances related to the student's status, i.e., single, married or dependent, self-supporting or not and living on or off campus. Expenses for living such as rent, food or clothing are not an allowable deduction for CalFresh. Allowable expenses include:

- Books and supplies (Including the rental or purchase of any equipment, material and supplies related to the course of study.)
- Dependent Care
- Insurance/loan origination fees and premiums
- Mandatory fees
- Transportation

- Tuition

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## IX. Calculating Educational Income

Once the institution has set the term, the period the grants, loans and scholarships are intended to cover is never changed even if the student quits school and/or has exhausted their funds. Use the following to calculate the educational income of a student:

- Total all non-exempt loans, grants or scholarships awarded to the student.
- Total all the allowable school expenses and subtract from total non-exempt income.
- Pro rate the remainder of educational income over the period that they are intended to cover.

**Note:** Count any portion of a month as a full month i.e., school term Aug. 28<sup>th</sup> - May 29<sup>th</sup> = 10 mos.

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## X. Student Income

### A. Income Exclusions

In general, education assistance is considered excluded income when determining CalFresh eligibility. Educational assistance includes, but is not limited to, loans on which payment is deferred, scholarships, grants, work study, fellowships, veterans educational benefits, and the like. The following are the various types of educational assistance available and instructions for the treatment of such benefits. If the information provided on the application does not provide sufficient information to confirm the student education income is exempt from consideration, ESTs shall attempt to clarify the information with the household. If the EST is unable to clarify the information, then the EST shall request verification from the client to clarify whether the income received is an exempt income type or is used for allowable educational expenses. As a reminder, ESTs shall not restrict the household to a specific type or method, such as specific paperwork, when requesting verification.

Financial educational assistance provided under any of the following is excluded from consideration as income in CalFresh determinations:

- A program funded in whole or in part under Title IV of the Higher Education Act including, but not limited to:
  - Pell Grants
  - Federal Supplemental Educational Opportunity Grants (SEOG)
  - Stafford Loans (subsidized and unsubsidized)
  - Cal Grants (A, B, and C)
  - Federal Parent Loan for Undergraduate Students
  - Federal Direct Loan Demonstration Program
  - Federal Supplemental Loans for Students
  - Byrd Honors Scholarships
  - Income Contingent Direct Loan Demonstration Program

- Special Programs for Students Whose Families Are Engaged in Migrant and Seasonal Farm Work (CAMP)
- Upward Bound
- Presidential Access Scholarships
- National Student Savings Demonstration Program
- Federal Consolidation Loans
- Paul Douglas Teacher Scholarship Program
- Special Child Care for Disadvantaged
- Model Program Community Partnership and Counseling Grants
- Bureau of Indian Affairs student assistance programs
- Title XIII, Indian Higher Education Programs, Tribal Development Student Assistance Revolving Loan Program (Tribal Development Student Assistance Act)
- Carl D. Perkins Vocational and Applied Technology Education Act Amendments of 1990
- Fee Waivers including California College Promise Grant (CCPG), formerly Board of Governors Grant (BOGG) fee waiver
- All earned income from a State Work Study program
- All earned income from Federal Work Study is to be excluded from consideration as income.
- Educational loans on which repayment is deferred must be excluded. A loan on which repayment is not required to begin until 60 days after receipt of the loan, is considered a deferred repayment loan. All other loans, including loans from private individuals as well as commercial institutions, may be excluded from household income. Both deferred student loans and vendor payments are considered income exclusions. A vendor payment is a direct payment made by a person or organization outside of the household, on behalf of a household, to either the household's creditors or to a person or organization providing a service to the household. Non-deferred student loans can be considered a vendor payment and thus an income exclusion.
- Income excluded for CalWORKs purposes. The following income types are excluded under this provision:
  - Needs-based grants for undergraduate students.
  - Grants whose proceeds are not available to meet the student's current needs.
  - Any award or scholarship provided to or on behalf of a dependent child based on the child's academic or extracurricular activity.
  - Any other loans which have a written agreement specifying obligation to repay and a repayment plan.
  - Servicemen's Readjustment Act of 1944 (Galvanized Iron [G.I.] Bill) and other Veterans Administration (VA) educational, vocational, training, and rehabilitation benefits are exempt from consideration as income to the extent that the monies are used to meet educational expenses.
  - AmeriCorps program living allowance for housing, meals, member uniforms (sometimes referred to as a stipend), limited medical benefits, an education award, and childcare benefits in certain circumstances.
  - All payments received by members of AmeriCorps State and National and AmeriCorps National Civilian Community Corps (NCCC) are excluded from consideration in CalFresh.
  - Californians for All College Corps volunteer program is a state disaster relief program designed to provide financial relief in response to the COVID-19 national

emergency. As such, stipends and educational awards received under College Corps are excluded from consideration as income and resources.

- CalFresh applicants and participants who were receiving public assistance or CalFresh at the time they became members of AmeriCorps Volunteers in Service to America (VISTA) shall have stipends and educational awards received from AmeriCorps VISTA excluded from consideration as income.
- Educational assistance not otherwise excluded by federal statute, to the extent that it is either earmarked by the lender, used for, or intended to be used for, allowable educational expenses at qualifying institutions. Qualifying institutions include those providing secondary or post-secondary education or the equivalent of a secondary diploma, including correspondence schools at these levels and a school at any level for the physically or mentally handicapped or a vocational education program.
- Educational Expenses
  - If financial aid is not exempt, allowable educational expenses may be deducted from the countable income. Allowable educational expenses include tuition and mandatory fees (including the rental or purchase of any equipment, material, and supplies related to the pursuit of the course of study involved), books, supplies, transportation, dependent care, miscellaneous personal expenses incidental to attending an institution, school, or program, origination fees, and insurance premiums on student loans. Students can verify allowable educational expenses through self-attestation.

## B. Countable Income

Households which receive scholarships, deferred educational loans, or other educational grants shall have such income, after exclusions, averaged over the period for which it was provided.

Countable student financial aid includes:

- Any non-needs-based awards and scholarships including private scholarships, some athletic scholarships, some fellowship grants, or other non-needs-based grants, are counted as unearned income when they are:
  - not indicated as exempt under Subsection A above,
  - not received by a dependent child, and
  - not earmarked, used for, or intended to be used for qualifying educational expenses.
- Any loans, not otherwise exempt, that do not have a written agreement and repayment plan.
- Housing allowance and subsistence payments, portions of VA educational, vocational, training, and rehabilitation benefits, and programs are countable as income in non-assistance CalFresh (NACF) households. These allowances are excluded from consideration in public assistance (PACF) households. Other types of VA benefits such as disability or retirement payments are countable as unearned income.
- Stipends for educational/research and employment purposes when participating in a particular program or major. Regardless of receipt date, the stipend income is to be averaged over the period for which it was provided – typically a semester. Any amount that can be verified as spent on allowable educational expenses may be excluded from consideration prior to averaging.
- New applicants, who are members of the AmeriCorps VISTA program, and were not receiving public assistance or CalFresh at the time they joined VISTA will have any payments received from the program counted as earned income.

### C. CalSAWS Income Type

When entering “Educational, Student” Income Category information into CalSAWS, it is important for ESTs to select the appropriate type for any financial aid awards and understand if the selected income type will be counted in the CalFresh budget based on the income listed in subsection A and B above. Refer to the table below for guidance.

Income Detail Type	Income Counted in Budget?	Grants a Student Exemption?
Awards/Scholarships	N	N
Cal Grant A	N	N
Cal Grant A – TANF	N	Y
Cal Grant B	N	N
Cal Grant B – TANF	N	Y
Cal Grant B Access	N	N
Cal Grant C	N	N
Grants, Loans – Needs Based	N	N
Grants, Loans – Non Needs Based	Y	N
Title IV, Other Federal	N	N

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## XI. Veterans Educational Benefits

The type of VA educational benefit must be verified. Information about a veterans benefit may be obtained through a regional office. The following is a list of various types of veterans educational benefits currently available and instructions for treatment of such benefits.

### A. Veterans Educational Assistance Program (VEAP), Post-Vietnam Era

- Funds contributed by the veteran are treated as a resource.
- If the money were used for educational expenses, only the matching government funds would be considered educational income.
- If funds are not used for education expenses, the VA provides no matching funds.
- The check does not distinguish between the veteran's contribution and VA's contribution.

### B. US Dept. of Veterans Affairs Vocational Rehabilitation Program

- Benefits for educational assistance less excludable expenses are counted as income.
- VA pays the institution directly for tuition, books supplies and tutorial or special needs.

### C. Montgomery GI Bill

- Individuals are in a pay reduction program where they agree to serve for reduced wages.
- The education benefit is not directly related to the funds withheld from their wages.
- The educational assistance less the excludable expenses is counted as income.

### D. Reservists Montgomery GI Bill

- Does not require a contribution by the service member.

- Any educational assistance received less the excludable expenses are counted as income.

**E. Vietnam ERA GI Bill**

- The veteran makes no contributions.
- Any educational assistance received less the excludable expenses are counted as income.

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## XII. Ineligible Students

Any student who does not meet the eligibility criteria as described in [Section V](#), shall be considered an ineligible student and an excluded household member. The eligibility of remaining household members shall not be affected by the exclusion of an ineligible student. The following shall be used to determine eligibility when an ineligible student lives with other household members:

**A. Eligibility and Benefit Level**

The income and resources of an ineligible student shall not be included when determining the household size for the purposes of:

- Assigning a benefit level to the household;
- Comparing the household's monthly income with the income eligibility standards;
- Comparing the household's resources with the resource eligibility limits; or,
- Determining the categorical eligibility of the remaining household members.

**B. Shared Shelter Expenses**

When a household shares shelter expenses with an ineligible student, only the amount actually paid or contributed to the household shall be deducted as a household expense. If the payment cannot be differentiated, the expenses, with the exception of SUA, shall be prorated evenly among the persons actually paying or contributing to the expense and only the household's pro-rata shall be deducted.

ESTs may use [Form CF 6177 CalFresh Student Exemption Screening Form](#) to help identify student exemptions.

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## XIII. Attachments

[Form CF 6177 CalFresh Student Exemption Screening Form](#)  
[TANFC1 Sample 4.18](#)

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#### XIV. References

ACIN I-45-11E

[ACL 24-31](#)

ACL 22-46

ACL 21-58

ACL 20-08

ACL 19-32

ACL 18-27

ACL 17-05

ACL 15-70

ACL 12-37

MPP Sections 63-406.1; 63-406.13; 63-406.111(a); 63-406.22; 63-406.221; 63-406.2169(a)

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