

CalFresh for Nonminor Dependents (NMDs) and Youth Exiting Foster Care: A Fact Sheet for Advocates

The passage of HR 1 has resulted in changes to the SNAP program that will impact transition aged youth. It remains the case that SNAP/CalFresh can help young people meet their food needs and provide stability as they make the transition to adulthood and that many young people are eligible for this benefit. However, the new federal law brings with it new restrictions that young people will need to navigate so that they remain connected to CalFresh.

Per recently issued state guidance, [ACL 25-92](#) and [ACL 25-93](#), California is scheduled to implement the new provisions related to immigration status on **April 1, 2026** and the expanded SNAP/CalFresh work and time limit provisions beginning on **June 1, 2026**. This fact sheet was last updated on January 5, 2026, and provides the available information we have about implementation. Please check our websites, www.ylc.org and www.pilpca.org, for updated information as we get closer to April and June. We also recommend that you bookmark CDSS's CalFresh website, [CalFresh](#), and [Resource Center](#) to keep up with implementation and policy.

Here are some key takeaways from this Fact Sheet:

- Non Minor Dependents (NMDs) in extended foster care may be eligible for CalFresh, especially those in Supervised Independent Living Placement (SILP) settings.
- Some of the benefits and funds that NMDs receive are excluded from income for purposes of calculating the CalFresh benefit and may result in a higher CalFresh grant.
- Young people should be assisted by the child welfare agency in submitting a CalFresh application as part of their transition plan and before they leave foster care at age 18 or older. This assistance is even more critical given the increased restrictions resulting from HR 1.
- CDSS policy allows a CalFresh application to be submitted 30 days before a young person exits foster care at age 18 or older to help ensure timely benefit receipt upon discharge From foster care.
- Many young adults will be eligible for CalFresh after exiting foster care at age 18 or older.
- As a result of the passage of HR 1, young adults with experience in foster care and homeless individuals are no longer exempt from the SNAP/CalFresh work and time limit requirements.

- There are exemptions to the new work and time limit requirements for which young people may be eligible and will greatly benefit from your assistance to navigate these new rules.
- Students who attend college or training more than half time are exempt from the work and time limit requirements, but are required to meet student requirements to maintain eligibility for CalFresh. The student requirement also has exemptions for which young people may be eligible.

CalFresh Basics

How can CalFresh help provide food security?

CalFresh—California’s name for the federal Supplemental Nutrition Assistance Program (SNAP) (aka food stamps)—provides eligible individuals and families benefits to purchase food. The amount of the benefit depends on an individual’s or household’s income and includes members of the household that are buying and preparing food together. Benefits are accessed by using an Electronic Benefits Transfer (EBT) card, which works like an ATM card. It can be used at grocery stores, farmer’s markets and some online stores to purchase food.

Can young people receive CalFresh while in extended foster care?

Young people in foster care may be able to receive CalFresh. Their eligibility will depend on their income and who they live and prepare food with.

PRACTICE TIP: Many young people in extended foster care are eligible for CalFresh and are not receiving this critical benefit. Assist young people with the CalFresh application and recertification and include application support in the case plan.

How is eligibility for CalFresh Determined?

Individuals and households may be eligible for CalFresh if they are low income and meet several other criteria. A household’s income is calculated using a variety of factors that will be discussed below.

Income is used to determine if an individual or household is eligible and how much their CalFresh grant will be. In some cases, there are also work requirements to receive CalFresh, which will be described more below.

Below we explore some of the key terms to know to understand how eligibility for CalFresh is determined with a focus on how they may play out for youth in and leaving foster care: (1) household; (2) income; and (3) deductions.

(1) Household: The income of a household is what is considered for CalFresh eligibility. For that reason, it is important to understand who is considered a “household.” The household is a group of people who live together and regularly purchase and prepare food together. This includes people who are or are not related. People who must be included in a household include the applicant’s spouse and their children who are under age 22. Note: this means that if a nonminor dependent is residing with their parent, they must be in their parent’s CalFresh household.

NMDs can live in a variety of different settings. The chart below lists some common NMD living settings and who would be considered part of the household.

Examples of Supervised Independent Living Placements (SILP) or Transitional Living Setting (TLS)	Who is in the Household?
The nonminor rents their own apartment and lives alone or with their child(ren).	The household includes the nonminor and their child(ren).
The nonminor lives in an apartment with a roommate with whom the nonminor buys and prepares meals	They are a household of two since they live together and prepare food together and must receive CalFresh as a household.
The nonminor lives in an apartment with a roommate, but the nonminor and their roommate prepares their meals separately	The nonminor is a household of one.
The nonminor is a boarder ¹ in someone’s home and pays for room and board (food).	The nonminor must be included in the household of whoever they are paying room and board to.
The nonminor rents a room, but rent does not include paying for board (food). ²	The nonminor can apply as their own household.
The nonminor lives in a dorm run by a college, university or training program.	The nonminor can apply as their own household if they prepare their own food and

¹ Boarders are people, including youth in some foster care placements, for whom payment is made to live and eat in someone’s home or property. 7 C.F.R. §§ 273.1(b)(3) and (4); MPP §§ 63-402.3, 63-402.141(a) and .144..

² In this case, the nonminor is a “roomer.” 7 C.F.R. § 273.1(b)(5).

	<p>are not enrolled in a meal plan.</p> <p>If the nonminor receives more than 50% of their meals through a campus meal plan, they are not eligible for CalFresh.</p>
The nonminor lives in a homeless shelter run by a non-profit.	The nonminor can apply as their own household.
Examples of Transitional Housing Placement Programs for Nonminor Dependents (THP-NMD) Settings	Who is in the household?
The nonminor lives in their own apartment without a roommate (whether in a staffed site or a remote site)	The household includes the NMD. The household also includes the NMD's child(ren) if they reside with them.
The nonminor lives in an apartment (whether in a staffed site or a remote site) with a roommate with whom the nonminor buys and prepares meals	They are a household of two since they live together and prepare food together and must receive CalFresh as a household.
The nonminor lives in an apartment (whether in a staffed site or a remote site) with a roommate, but the nonminor and their roommate prepares their meals separately	The nonminor is a household of one.
The nonminor lives in a host home and food is provided to the nonminor.	The nonminor must be included in the household of whomever they are paying room and board to (i.e. whoever is receiving their foster care maintenance payment).
The nonminor lives in a staffed site where the THP-NMD program provides food to participants	The nonminor would not be eligible for CalFresh.

Foster Home	A foster home is paid to cover the youth’s daily living needs, including food. The nonminor is considered a “boarder” and would be included in the household of their foster parents. They would not be their own household.
Short-Term Residential Therapeutic Program (STRTP)	If the nonminor is placed in an STRTP, the child welfare agency, probation department, or tribe is paying for their room and board (food) through their foster care maintenance payment and they would not be eligible for CalFresh.

(2) Income: Income is the money that the nonminor has through work and other sources. Most households must have less income than the gross and net income limits to be eligible for CalFresh. The county welfare office first looks at a household’s gross monthly income to determine whether it is below the gross income limit (130% of the federal poverty line). If monthly gross income is below the limit, then the CalFresh office will look at the household’s net monthly income (income after it subtracts some of the household’s expenses) to determine how much CalFresh a household will receive. Net monthly income must be below 100% of the federal poverty line.

There are many CalFresh rules about income that result in some of the funds that the nonminor has on hand NOT being counted as income. These rules are important to help ensure that an NMD or former foster youth gets the maximum CalFresh benefit for which they are eligible. Below are some examples that are most relevant to NMDs and former foster youth.

Funds that Do Count as the NMD’s Income

- Any portion of the NMD’s foster care payment that is received directly by the NMD is considered unearned income and included when determining the household’s eligibility and benefit level. Money paid to a NMD directly to pay for their SILP setting, for example, is counted as income. Funds paid directly to a NMD from a THP-NMD provider for the NMD to pay for food and living expenses also count as income.

- A stipend that is provided to a NMD is counted as income if it is provided through a credit card company prepaid gift card.
- For an expectant or parenting youth, any portion of the infant supplement or expectant parent payment that is received directly by the NMD is considered unearned income.

Funds that Do Not Count as Income

- Funds that are not paid directly to the NMD are not considered unearned income. This includes the portion of the foster care payment that is paid directly to a transitional housing placement provider or is paid to a vendor to provide goods or services to the NMD. This also includes when a rent payment is made directly to a landlord.
- In-Kind income (benefits received other than cash), including payments made to third parties under the Transitional Housing Placement Program Plus (THP-Plus) do not count as income.³
- If the NMD is provided an establishment-specific gift card (e.g. a Target Gift Card, an Amazon gift card), it is excluded as resources in determining a household’s eligibility or benefit level.
- Financial aid for postsecondary education and training, like grants and scholarships, are excluded from income
- A NMD’s income from work does not count if they are participating in the Independent Living Program and they have a Transitional Independent Living Plan (TILP) that states that the purpose of the employment is “to enable the child to gain knowledge of needed work skills, work habits, and responsibilities of maintaining employment.”⁴ But, if it is not included in the TILP, money paid for work WOULD count as income.

PRACTICE TIP: If a young person is working, make sure to include this in the TILP so that the funds from work are not counted as income for CalFresh.

³ MPP § 63-502.2(a), California Department of Social Services (CDSS) All-County Information Notice (ACIN) I-54-09, available at https://www.cdss.ca.gov/lettersnotices/entres/getinfo/acin/2009/I-54_09.pdf.

⁴ WIC 11008.15 “Notwithstanding Sections 11008.14 and 11267, the department shall exercise the options of disregarding earned income of a dependent child or ward of the juvenile court derived from participation in the Job Training Partnership Act of 1982 (Public Law 97-300), a dependent child or ward of the juvenile court who is a full-time student pursuant to the Deficit Reduction Act of 1984 (Public Law 97-369), a dependent child or ward of the juvenile court 16 years of age or older who is a participant in the Independent Living Program pursuant to the Consolidated Omnibus Budget Reconciliation Act of 1985 (Public Law 99-272), and, on and after January 1, 2012, a nonminor dependent, as defined in subdivision (v) of Section 11400 who is participating in a transitional independent living case plan pursuant to the federal Fostering Connections to Success and Increasing Adoptions Act of 2008 (Public Law 110-351), provided that the child's Independent Living Program case plan states that the purpose of the employment is to enable the child to gain knowledge of needed work skills, work habits, and the responsibilities of maintaining employment.”

What are the income limits for CalFresh?

The income limits for CalFresh are updated each year and are included in an All County Information Notice (ACIN). Until September 30, 2026, \$1,696 is the gross monthly income limit for a household of one, \$2,292 for a household of two, and \$2,888 for a household of three.⁵

The gross income limit is 130% of the federal poverty line and net income must be at or below 100% of the federal poverty line.⁶

Can a youth who receives Supplemental Security Income be eligible for CalFresh?

Yes! As of June 1, 2019, individuals receiving Supplemental Security Income (SSI) may be eligible to receive CalFresh, provided they meet other CalFresh eligibility criteria.⁷

Are there tools that can help a young person calculate the amount of CalFresh they may be eligible for?

Yes, a CalFresh calculator can be found here:

<https://calfresh.guide/how-to-calculate-the-monthly-grant-amount/>. This tool can be used to provide an estimate. This CalFresh calculator is updated regularly based on new CalFresh rules.

PRACTICE TIP: Explore the CalFresh calculator with clients to provide an estimate of benefits and better understanding of how the program works:

<https://calfresh.guide/how-to-calculate-the-monthly-grant-amount/>

Restrictions to CalFresh Access for Non-Citizens Resulting from HR 1

Are there any new immigration or citizenship requirements for CalFresh as a result of HR 1?

Yes. As a result of HR 1, CalFresh is only available to (1) citizens, (2) lawful permanent residents (LPRs or green card holders), (3) Cuban and Haitian entrants, and (4) individuals living under the Compact of Free Association (COFA) who are from the Marshall Islands, Micronesia, and Palau. Some individuals who were previously eligible for SNAP/CalFresh prior to HR 1, but *are no longer eligible* include: refugees, asylees, survivors of domestic violence who are self petitioners under the Violence Against Women Act, and certain trafficking survivors. Please see [Clarifying](#)

⁵ This data is updated yearly and currently can be found in [ACIN 1-46-25](#).

⁶ 7 C.F.R. 273.9 (a).

⁷ Assembly Bill 1811 (2018), ACL 18-90, available at <https://www.cdss.ca.gov/Portals/9/ACL/2018/18-90.pdf?ver=2018-07-31-142643-887>.

[Access: What New Federal SNAP Restrictions and Guidance Mean for Immigrant Communities - NILC](#) for more details.

Unfortunately, youth who are applying for Special Immigrant Juvenile Status (SIJS) or have been granted SIJ status but have not adjusted to LPR status continue to not be eligible for CalFresh. As well, individuals who are undocumented or are Deferred Action for Childhood Arrivals (DACA) recipients are not eligible for CalFresh.

Some individuals who are not eligible for CalFresh may be eligible for the state-funded California Food Assistance Program (CFAP).⁸ As of the updating of this fact sheet, December 2025, advocacy is ongoing related to the potential expansion of the CFAP program to address new restrictions resulting from HR 1. Due to the array of restrictions that apply to immigrant TAY and their access to food assistance, identifying food banks and other sources of assistance will remain critical.

When is California implementing the new restrictions on CalFresh access for non-citizens?

Per [ACL 25-92](#) (December 31, 2025), implementation is scheduled to begin on April 1, 2026. Counties are not to implement before that date and must await automation changes, staff training, and further guidance. On and after April 1, 2026, (1) all new applicants for CalFresh will be subject to the new rules and (2) ongoing CalFresh recipients will be subject to the new rules at their recertification and every 6 months thereafter. This new rule applies to individual household members. Individuals who meet the new immigration status requirements will remain eligible and will not lose eligibility because another household member loses their individual eligibility.

[The New Work and Time Limit Requirements Resulting from HR 1 and Exemptions from the New Requirements](#)

What are the new requirements related to work and the amount of time an individual can be on CalFresh?

CalFresh has a rule that limits benefits for some adults to only three months in a 3 year period unless the individual can show they are exempt from or are meeting the work activity requirement. This rule is currently called the “ABAWD” rule because it used to only apply to “Able-Bodied Adults Without Dependents.” HR 1 has not changed this rule, BUT has expanded the types of individuals to which this rule applies.

⁸ CFAP uses state funds instead of federal funds, and is administered in exactly the same way CalFresh is, and so many people who receive CFAP do not know that they are not receiving CalFresh.

Who does the work and time limit rule now apply to?

The new rule applies to individuals ages 18 through 64, including young adults with experience in foster care and homeless individuals who were previously exempt from the work and time limits requirements.

What are examples of exemptions to the work activity requirement?

There are at least two points in the process where a young adult may be eligible for an exemption.

First, an individual is not required to meet the work requirements *and* the time limits will not apply to them if they meet one of the criteria below:

- Earning at least \$217.50/week (\$870 month, averaged).
- Mentally or physically unable to work (cannot regularly do 30 hours/week of work/training).
- They are a parent or are responsible for the care of a child under 6 or someone who is incapacitated.
- They are meeting TANF/CalWorks work requirements.
- Applying for or receiving Unemployment benefits.
- Applying for or receiving Social Security Administration benefits or any other type of disability benefit, including Supplemental Security Income (SSI).
- Regularly participating in a drug or alcohol treatment and rehabilitation program (residential or otherwise).
- Enrolled at least ½ time in a school or training program (including adult schools, ESL)

Second, if the individual does not meet any of the categories above, they will be reviewed to see if they are subject to time limits, **BUT** they will be exempt if they are:

- Mentally or physically unfit for work (cannot do 20 hours/week work/training)
- A parent or other member of a household with responsibility for a dependent child under 14 years of age
- Pregnant (any stage)
- An Indian or an Urban Indian, or a Californian Indian

When is California implementing the expanded work and time limit requirements from HR 1?

Per [ACL 25-93](#) (December 31, 2025), implementation is scheduled to begin on June 1, 2026.

Counties are not to implement before that date and must await automation changes, staff training, and further guidance. On and after June 1, 2026, (1) all new applicants for CalFresh will be subject to the new rules and be screened for exemptions and (2) ongoing CalFresh recipients will be screened at their recertification and every 6 months thereafter. No negative actions can occur with respect to an applicant or recipient until this new screening occurs, which is called a *HR1 compliant exemption screening*. See [ACL 25-93](#), page 8.

What can advocates do to help a youth prove they are eligible for an exemption or that the time limits/work requirements do not apply to them or that ?

While TAY with experience in foster care and/or who are homeless want to be employed, often their circumstances can create significant challenges to securing and maintaining stable employment. Further, finding employment while also struggling to meet basic needs, like food security, adds an additional stressor for youth that can impact their health and well-being in ways that prevent them from being able to achieve their employment goals. This is especially the case if they have experienced abuse or neglect, are still addressing the impacts of trauma, do not have a consistent support system, or do not have a stable place to live.

The CalFresh agency must screen individuals when they apply for CalFresh and when their eligibility is recertified to see if they qualify for an exemption from the general work requirements or the time limit. You can help prepare young adults for the screening interview or recertification by (1) reviewing the possible exemptions with them and (2) preparing them for the screening interview so that they can identify themselves as eligible for an exemption and bring any proof that may be required. You can assist youth in connecting the dots between their exposure to trauma and/or the existence of a disability or impairment and an exemption.

Once you have discussed the exemptions with the youth, you can help them complete [this form](#), the CF 377.11E (Time Limit Exemption Screening Form), which lists many of the exemptions listed above. If the young person has a BenefitsCal account, they can also complete the exemption questions through that platform to quickly communicate their exemption to their worker. If your organization would like to be approved to be able to assist individuals with their applications through the BenefitsCal portal, please refer to [ACL 24-91](#). This access allows Community Based Organizations to submit applications on behalf of applicants, upload documents, and check the status of applications.

What proof must be submitted to show eligibility for an exemption?

Most exemptions can be granted based on the individual's statement or attestation. The main exception is if exempt based on earnings, as earnings need to be verified for the application/recertification process. The CalFresh agency generally must accept an attestation unless it is "questionable" or verification is specifically required. The [GEN 853](#) form can be used for a sworn statement. The state defines "questionable" as when the person's statements contradict each other or conflict with other information the county has.⁹

Before the CalFresh agency asks the individual to submit evidence or proof of an exemption, they should see what data and information they have access to that shows an exemption is met. For

⁹ See Manual of Policies and Procedures (MPP) § 63-300.5(g)(Verification of Questionable Information).

example, the CalFresh office will have access to information about whether an applicant is receiving state or federal disability benefits and should not ask for any additional documentation.

Below are examples of exemptions and the proof that is needed to support those exemptions.

Exemptions or Indicators that the Individual is Exempt	Required Proof
Applying for or Receiving Disability or Unemployment	<p>Verbal or sworn statement (GEN 853), or supporting documents (if requested).</p> <p>Possible supporting documents include: Letter from the Social Security Administration, SSI, state disability, or unemployment office, application receipt, EDD verification</p>
Caring for a Child Under 6 or Someone with a Disability	<p>Verbal or sworn statement (GEN 853) or supporting documents (if requested)</p> <p>Possible supporting documents: letter or sworn statement from family with the minor child or the adult needing care; IHSS worker notes about care above paid hours</p>
Earning \$217.50 or more per week	Recent pay stubs, letter from employer showing hours/pay, self-employment records (invoices, bank statements)
Enrolled in school or training at least half-time or 20 hours per week	<p>Verbal or sworn statement (GEN 853), or supporting documents (if requested).</p> <p>Possible supporting documents include: class schedule showing hours per week, enrollment verification from the school, letter from advisor/program coordinator confirming enrollment hours</p>
Experiencing Chronic Homelessness (tied to a health or mental health condition)*	<p>Verbal or sworn statement (GEN 853) describing housing situation (how long unsheltered, inability to meet basic need for shelter/food), or supporting documents (if requested).</p> <p>Possible supporting documents include: note from a shelter or service provider, statement from a doctor or counselor confirming health impact.</p>

Experiencing Domestic Violence (tied to a health or mental health condition)*	<p>Verbal or sworn statement (GEN 853) or supporting documents (if requested).</p> <p>Possible supporting documents include: letter from a domestic violence shelter, counselor, or support agency; note from a shelter or service provider, statement from a doctor or counselor confirming health impact.</p>
Health or Mental Health Condition	<p>Verbal or sworn statement (GEN 853) or supporting documents (if requested).</p> <p>Possible supporting documents include: Doctor’s note, counselor statement, caseworker confirmation, CalFresh Medical Certification Form (CF 887).</p>
In Treatment or Recovery for Drug/Alcohol Use	<p>Verbal or sworn statement (GEN 853) or supporting documents (if requested).</p> <p>Possible support documents include: Treatment program enrollment, medical provider note, CalFresh Medical Certification Form (CF 887).</p>
Pregnant	<p>Verbal or sworn statement (GEN 853) supporting documents (if requested).</p> <p>Possible supporting documents include: prenatal documentation, proof of positive pregnancy test from a medical provider.</p>
Volunteer or Community Service (people normally don’t get paid for this type of work)	<p>Your Verbal or sworn statement (GEN 853) or supporting documents (if requested).</p> <p>Possible supporting documents include: letter from volunteer or community service coordinator, CalFresh ABAWD Volunteer Work Hour Verification Form - CF 888, sworn statement (GEN 853) from the person/group the young person volunteers for.</p>
Unpaid work (people normally get paid for this type of work)	<p>A verbal or sworn statement (GEN 853) or supporting documents (if requested).</p> <p>Possible supporting documents include: sworn statement of person for whom the youth is working without pay. EXAMPLES: young person is a notetaker for a fellow student not yet approved for disability services; young person provides services for a neighbor (dog walking, or yard work) that they can’t afford to pay the young person for.</p>

Working (including gig or self-employment)	Recent pay stubs, letter from employer showing hours/pay, self-employment records (receipts, invoices, bank statements), in-kind work agreement (working in exchange for rent, etc.). The young adult can consent to use “TruV” and enter their employment information to get real time verification via the employer’s payroll site.
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*Chronic homelessness and experiencing domestic violence are not exemptions per se; however, under California policy they are described as indicators that the individual *may* meet an exemption because these circumstances are connected to a physical or mental health challenge that impacts the person’s ability to perform 20 hours of work/education/training activities.

If a young adult is not exempt and must meet the work activity requirement, what are ways they can meet the requirement?

The work activity requirement can be met in the following ways:

- **Paid work**, including self employment, for 20 hours a week or an average of 80 hours a month.
- **Volunteer** for 20 hours a week or an average of 80 hours a month.
- **Workfare**, which is work that an individual does to “pay for” the SNAP benefit.
- Other unpaid work
- **Attend training programs**, which can include SNAP Education and Training Programs (E & T), Workforce Innovation and Opportunity Act programs, approved Local Programs Increasing Employment (LPIE), and including youth and TAY workforce programs.

Finally, if the young person is dealing with a crisis or something beyond your control, like an illness, a household emergency, or transportation not being available, the youth can request a **temporary good cause exemption**.

What do students attending community college, college, or a vocational training program need to do to stay eligible for CalFresh?

The SNAP eligibility requirements for students have not been changed by HR 1. While students attending postsecondary programs and training are exempt from the ABAWD work and time limit requirements, there are student eligibility requirements that must be navigated to maintain eligibility. Please refer to [this section](#) of LSNC’s CalFresh Guide for a reminder of the requirements for students. Students are also encouraged to seek assistance from their **Campus Basic Needs Program** for help to navigate the student rules and identify additional food resources. We note a few elements of the student rules below that are especially relevant to TAY.

Who is considered a student who is exempt from the ABAWD work and time limit requirement?

Students enrolled at least half-time in an institution of higher education are exempt from the work requirement rules if they meet the CalFresh student eligibility rules.¹⁰ A student is a person between ages 18 and 49 who is enrolled in higher education at least half-time. This requirement applies to institutions of higher education that are either (a) business, trade, technical or vocational schools normally requiring a high school diploma or GED to enroll; or (b) a junior, community, two-year or four-year college or university, or graduate school, regardless whether a high school diploma or GED is required (such as California Community Colleges (CCCs), California State Universities (CSUs), or Universities of California (UCs), or nonprofit and for-profit colleges).

What are the CalFresh student eligibility rules?

A student enrolled in higher education is eligible for CalFresh and exempt from the ABAWD requirements if they meet one of the following criteria:

- Employed 20 hours per week or averaged to 80 hours per month,
- participating in a program to increase employability ,
- unable to be employed due to a disability.¹¹
- receiving federal or state work-study money.¹²
- approved for a TANF-funded Cal Grant A or B (CalWorks or Tribal TANF).
- students with children with the following situations:
 - full-time student with a child under age 12; or
 - part-time student with a child under age six or a child between ages six and 12 for whom adequate care is not available; or
 - receiving CalWORKs
- Does not intend to register for the next normal school term.
- enrolled in a CalFresh employment and training (FSET) program, or other state or local job training programs that USDA will accept.
- enrolled in a program to increase the student’s employability, which are referred to as LPIE programs—Local Programs that Increase Employability.

¹⁰ MPP §§ 63-407.21(h), 63-406.2. (See MPP 63-406.1: “Any person who is age 18 through 49; physically and mentally fit for employment; and enrolled at least half-time, as defined by the institution, in an institution of higher education (as defined in Section 63-406.111(a)), shall be ineligible to participate in the Food Stamp Program unless that person complies with the eligibility requirements as specified in Section 63-406.2”).

¹¹ 7 C.F.R. §§ 273.5(b); MPP § 63-406.211

¹² “Receiving” for these purposes means when the student is approved (or awarded or accepted) for state or federally financed work study for the current school term, anticipates working during the term, and has not refused a work assignment. [ACL 17-05; ACIN I-89-15.] This exemption applies even if a work study job assignment has not yet begun or is not available.

For more information about student eligibility rules, see California Department of Social Services All-County Letter 24-31 CalFresh Student Eligibility Handbook Version 2.0.¹³

What makes a program a Local Program to Increase Employability (LPIE)?

An LPIE program must be (1) government-run, and (2) contain the equivalent of a CalFresh E&T component listed in federal law at 7 CFR 273.7(e)(2). To be government run, the program must be run or overseen by a CCC, CSU, or UC.¹⁴ LPIE programs must assist an individual to develop skills that increase their chances of being employed. They must provide structured programming that is required and ongoing rather than optional and intermittent activities. Drop-in centers that offer services on an as-needed basis are not considered an LPIE.

State law changed in 2022 with the passage of AB 396 of 2021. Now it is required that programs must be individually certified as LPIEs. Before the change in the law, there were types of programs that were considered LPIEs by virtue of their program type. For example, all Guardian Scholar programs were considered LPIEs. While many campus support programs that provide services to youth with experience in foster care may be eligible as LPIEs, they must go through the certification process. The certification process is streamlined and programs should use this [template](#). They can also get technical assistance from the Center for Healthy Communities by emailing their resource hub at CFOResourceHub@csuchico.edu. You can find a list of LPIEs approved by CDSS [here](#).

How can you find out if a program is certified as an LPIE?

You can find out if a program is certified as an LPIE [here](#).

PRACTICE TIP: If a young person is involved in a campus support program that you think would meet the requirements of an LPIE, but has not been certified yet, reach out to them and ask them to contact the Center for Healthy Communities at CFOResourceHub@csuchico.edu to find out the simple process for certification.

[Appealing a CalFresh Denial, Termination or Reduction of Benefits](#)

¹³ Available at

<https://www.cdss.ca.gov/Portals/9/Additional-Resources/Letters-and-Notices/ACLs/2024/24-31.pdf?ver=2024-05-13-162325-140>.

¹⁴ [CalFresh Student Eligibility: A Guide for College Campuses to Increase CalFresh Participation Through The Identification of Local Programs that Increase Employability](#) (June 2, 2022).

What can someone do if their CalFresh application is denied or they receive a notice that their CalFresh benefits will end or be reduced?

The county welfare agency must provide adequate written notice of any change, denial, or termination of a social services program benefit.¹⁵ The notice must be mailed at least ten days in advance of the effective date of change or termination.¹⁶ The notice must be a CDSS or county-developed form, prepared in clear language, and should inform the participant what information or action, if any, is needed to reestablish eligibility.¹⁷ If an individual disagrees with the proposed action, they have 90 calendar days to request a state fair hearing.¹⁸

If a household whose benefits have been reduced or terminated files a request for a hearing within the appropriate time frame, and the household's certification period has not expired, the county welfare department shall continue the household's participation in the Food Stamp Program *unless the household specifically waives in writing the continuation of benefits*.¹⁹ If they lose at hearing, they will be asked to repay the benefits they received during the appeal process.²⁰ They can also request a hearing if an action is taken and no notice was issued.

An individual can contact CDSS to request a state fair hearing online at <https://acms.dss.ca.gov/acms/page.request.do?page=public.intakeForm> or call (800) 743-8525. An individual can also submit their request to your County Welfare Department Office. It is best practice for all requests to be submitted in writing.

How can a nonminor dependent or former foster youth find legal assistance to help with an appeal?

The Legal Aid Association of California (LAAC) maintains a website with a statewide legal aid directory, which can be accessed [here](#).

What can someone do if their application is delayed?

Counties must process non-emergency CalFresh applications and issue benefits to those eligible, as soon as possible, but no later than 30 days after the date of application filing.²¹ An applicant household with very low income and few resources may qualify for "expedited service," commonly referred to as emergency CalFresh or food stamps.²² Under California law,

¹⁵ MPP §§ 22-001(a)(1), 22-071.13.

¹⁶ MPP §§ 22-001(t)(1), 22-072.4. The ten-day count does not include the day of mailing or the effective day of the action.

¹⁷ MPP §§ 22-071.3 – 22-071.6.

¹⁸ MPP § 63-804.5.

¹⁹ MPP § 63-804.611.

²⁰ MPP § 63-804.612.

²¹ 7 U.S.C. § 2020(e)(3); 7 C.F.R. § 273.2(a), (g)(1), (3); Welf. & Inst. Code § 18911(a)

²² 7 C.F.R. § 273.2(i)(1); MPP § 63-301.51.

emergency CalFresh must be paid to eligible households no later than three calendar days after applying.²³ Although counties have a mandatory duty to meet these deadlines, some counties fall behind in practice, and applications can linger beyond the statutorily mandated timeframes. If a CalFresh applicant's application is delayed, the person can request a state hearing, and if the application is for expedited service benefits, the applicant can request an expedited hearing.

[Exiting Foster Care and CalFresh Applications](#)

If a youth is in extended foster care and about age out, does the placing agency have an obligation to help them apply for CalFresh?

The child welfare agency and juvenile probation department are required to provide the NMD with written information that they may be eligible for CalFresh and how to apply at the last hearing before they turn age 18 and every hearing that follows.²⁴ As mentioned above, a NMD may be eligible for CalFresh while they are in extended foster care. Some young people may not be eligible for CalFresh until they exit foster care. For those young people, it is important to submit the CalFresh application prior to leaving foster care so that the benefits can be in place as close to your discharge date as possible. This is especially important as HR 1 is implemented as many young people will need assistance in navigating the new rules.

An NMD can submit a CalFresh application 30 days before their discharge.²⁵

PRACTICE TIP: Discuss whether youth are eligible for CalFresh at Transitional Independent Living Planning Meetings while they are in extended foster care and put actions to apply for CalFresh benefits in the TILP. If a youth is not eligible for CalFresh while in foster care, make sure their application is submitted 30 days prior to discharge date to ensure benefits begin as soon as possible. Make sure that at the last hearing before a youth is discharged from foster care that the court orders any assistance that is needed to help the young person apply for CalFresh before leaving care.

Can a youth who receives Supplemental Security Income be eligible for CalFresh?

²³ See Welf. & Inst. Code § 18914(b) (implementing 7 C.F.R. § 273.2(i)); MPP § 63-31.531(a).

²⁴ Welf. & Inst. Code § 391(b)(10); [ACL 23-40](#) (April 26, 2023).

²⁵[ACIN 1-35-13](#).

Yes! As of June 1, 2019, individuals receiving Supplemental Security Income (SSI) may be eligible to receive CalFresh, provided they meet other CalFresh eligibility criteria.²⁶

[Legal Citations for Key SNAP Provisions](#)

7 CFR § 273.7: General work requirement applicable to all SNAP households

7 CFR § 273.24: Time limits for ABAWDs

7 CFR § 273.24 (c): Exceptions to the ABAWD time limit

7 CFR § 273.5: Student eligibility requirements

7 CFR § 273.5 (b): Exemptions from the student work requirements.

[CDSS Forms and Resources](#)

CF 377.11E: Time Limit Exemption Screening Form

GEN 853 - Sworn Statement: Form to Document Attestations

CalFresh Medical Certification Form (CF 887): Form to document a mental health or physical disability

CalFresh ABAWD Volunteer Work Hour Verification Form - CF 888: Form to document volunteer work hours

H.R. 1 & CalFresh: Frequently Asked Questions: CDSS Maintained website about impacts of H.R. 1 on CalFresh

All County Letter 25-93 CF Implementation of HR1 - Changes to ABAWD Policy (December 31, 2025)

All County Letter 25-92 CalFresh Implementation of HR 1 Noncitizen Eligibility Changes (December 31, 2025)

[Additional Resources](#)

Legal Services of Northern California's Guide to CalFresh Benefits:

<https://calfresh.guide/>

John Burton Advocates for Youth NMD and CalFresh FAQ:

<https://jbay.org/resources/faq-non-minor-dependents-calfresh/>

Last edited: January 5, 2026.

²⁶ Assembly Bill 1811 (2018), ACL 18-90, available at <https://www.cdss.ca.gov/Portals/9/ACL/2018/18-90.pdf?ver=2018-07-31-142643-887>.

Please note that HR 1 implementation is ongoing as of the last update of this fact sheet. Please check out CDSS's CalFresh website, [CalFresh](#), and [Resource Center](#) for the most current information.