

## Imperial County Welfare-to-Work Supportive Services – Transportation Policy

### I. Introduction

The Manual of Policies and Procedures (MPP) Section 11-501.3 and All County Letters 00-08, 00-12, 00-54, require that Imperial County develop specific written policies and procedures for transportation supportive service in the CalWORKs program. To that purpose the following welfare-to-work transportation services policy has been developed. This policy is based on welfare-to-work regulations set forth in MPP chapter 42-700.

### II. Policy Statement:

Necessary transportation services shall be available to every participant in order to participate in the welfare-to-work program activity(s) to which he or she is assigned or to accept or retain unsubsidized employment.

Necessary services are defined as those services without which the participant would be unable to comply with his/her assigned welfare-to-work activity(s).

CalWORKs participants who are employed in unsubsidized employment for the required number of hours to meet participation requirements, and who opt out of an assessment are not required to sign a welfare-to-work plan, however the individuals are eligible to receive necessary transportation supportive services. If necessary transportation services are not available, the individual shall have good cause for not participating.

### III. Determination of Supportive Services Needs

Imperial County Department of Social Services is responsible for the assessment of transportation supportive services in concert with the applicant. This includes transportation needed for childcare as well as for welfare-to-work activities and employment. For those participants who are employed a sufficient number of hours in unsubsidized employment and can opt out of an assessment, supportive services needs shall be explored.

Transportation services for work activities and employment shall not be deemed necessary in circumstances that include, but are not limited to, the following:

- A. Transportation needs are being met or could be met without cost to the participant.
- B. The participant is not enrolled in an approved welfare-to-work activity.
- C. Any other like circumstance which demonstrates that there is no need for transportation services.

IV. Transportation Methods and Costs:

- A. Modes of transportation available to participants include, but are not limited to the following:
  - 1. Transportation provided by Imperial County.
  - 2. Available public transit.
  - 3. Private and other public transportation carriers. This includes, but is not limited to, the following: bus, carpool, vanpool, rideshare programs, private companies, and providers who transport children between schools and child care.
  - 4. Personal vehicle (pursuant to MPP section 42-750.112).

Transportation utilizing multiple carriers may be necessary for a participant to participate in their welfare-to-work activity(s).

B. Transportation Payment Rate:

Transportation costs shall be determined by regional market rates. The participant shall use the least costly mode of transportation.

Payments for supportive services are to be advanced to a participant whenever necessary and desired so that the participant need not use his or her funds to pay for these services.

1. Participants, who qualify for reimbursement, shall be reimbursed for transportation costs at the county designated rate as defined in Attachment A.
2. Necessary parking for welfare-to-work participants shall be reimbursed at actual cost. Participants must submit receipts for payment to be made, except in case where parking meters are used. Reimbursement for parking/parking meters will only be allowed when there is not any no-cost parking available within one-half mile of the work/training site as long as the individual has no physical limitations which would prevent a half-mile walk. The half-mile walk should not cause the individual's commute time to exceed two hours roundtrip or two miles round trip if walking is the only means of transportation available.
3. Participants who choose to use their own vehicle when county or public transportation is available will be reimbursed at the least expensive reimbursement rate (unless public transportation does not meet the time requirement).
4. Fixed or flat rate fees are allowable to the extent that they represent the least costly method of necessary transportation available, not to exceed operating costs as defined in Attachment A.  
Examples: Participant charged \$40 per month to secure a seat in a vanpool or \$6 per week to help cover the cost of gas in a co-worker's car.
5. Participants carpooling together shall be reimbursed as follows (based on the guidelines defined in Attachment A):
  - a. Owner/driver: Ownership and operating costs for the first 1,250 miles. After 1,250 miles, it reverts to operating costs only.
  - b. Riders: One-half operating costs or actual costs if less.

V. Transportation for Child Care:

For parents of school-age children, reliable transportation to take children between childcare or school or school and childcare may be necessary in order for parents to participate in their welfare-to-work activities. Some parents may rely on multiple child care arrangements to meet their needs, such as transportation that takes children from one child care provider (such as half-day Head Start program) to another (such as exempt provider). If transporting children is a necessary supportive service, transportation services shall be provided as follows:

- A. When transportation is included as part of their child care rate, transportation is fully covered by the CalWORKs childcare payment and subject to the Regional Market Rate (RMR). If the cost exceeds the RMR, parents are responsible for payment of the difference between the RMR and the actual childcare cost.
- B. If transportation is not included as part of a child care rate, the transportation charges are not paid through Stage 1 childcare. When it is determined that the child's transportation is necessary in order for the parent to participate in assigned welfare-to-work activities, transportation reimbursement shall be provided for children of welfare-to-work participants.

VI. Who is Eligible to Receive Transportation Payments:

The following participants are eligible to receive transportation supportive services payments:

- A. Any participant in assigned welfare-to-work activity(s) or employment who remains eligible for aid shall be eligible for necessary transportation expenses as specified in this policy. This includes participants in on-the-job training, grant based on-the-job training, supported work, or transitional employment.
- B. Any participant in unsubsidized employment who becomes ineligible for CalWORKs due to earned income shall be eligible to receive transportation supportive services for up to 3 months from the date of ineligibility from CalWORKs provided this duration does not exceed their 60-month CalWORKs time limit. See also section IX.

1. Any participant in on-the-job training who becomes ineligible for CalWORKs due to earned income shall remain a participant in the program under welfare-to-work for the duration of the on-the-job training assignment provided this duration does not exceed their 60-month CalWORKs time limit.

VII. Participant Responsibilities:

A. The participant is responsible for the following:

1. Providing verification of all transportation costs claimed on form IC-CW 119 in a complete and timely manner. This includes, but not limited to, receipts for parking permits and work/training/childcare related transportation costs.
2. Notifying the WTW Social Worker within 10 calendar days of any changes in transportation needs or costs.
3. Cooperating with the WTW Social Worker in resolving incomplete or inconsistent information.
4. When mileage is the reimbursement rate used, the participant shall provide verification of a valid driver's license and current registration and insurance for the vehicle used. Both the driver's license and the vehicle insurance shall be valid during the period covering the requested transportation expense.
5. Employed participants must submit verification of employment for the period of the claimed transportation expenses. This includes, but is not limited to, check stubs, employer statements, or time sheets/cards.

VIII. Imperial County Department of Social Services Responsibilities:

A. ICDSS, or its contracted agents, is responsible for the following:

1. Reviewing the need for transportation supportive services with the participant.

2. Fully informing the participant of all required forms and/or other verification required, including form due dates, that are needed to issue payment for transportation services. This includes informing the participant that non-receipt of required forms, without good cause, will result in nonpayment of transportation expenses.
3. Providing the participant with all forms required for payment of transportation supportive payments.
4. Making transportation referrals and/or arrangements for transportation for the participant as needed.
5. Processing the transportation claim form, IC-CW 119, in a timely manner and authorizing payment for transportation supportive services as indicated. Timely processing means determining the participant's eligibility for a transportation supportive services payment, issuing the appropriate NOA, and authorizing appropriate payment if eligible, within 20 working days of the claim's receipt.

IX. Job Retention Services:

Any participant in unsubsidized employment, who becomes ineligible for CalWORKs due to earned income, shall be eligible to receive transportation supportive services for up to 3 months from the date of ineligibility from CalWORKs. There shall be a cumulative 6-month lifetime limit.

Participants who have expired their CalWORKs 60-month time limit shall not be eligible for Job Retention Services.

- A. The County shall provide retention service payments for up to 3 months from the date terminated from cash aid provided the former participant continues to be employed during the 3 months and transportation supportive services payments are:
  1. Not provided by the employer or the entity that arranged the job placement, if other than the county;
  2. Not available from other sources

X. Transportation Services and Financial Aid:

A. Transportation reimbursement shall be provided, as stated above, if no other source of funding for those costs is available. Financial aid is treated as follows:

1. The availability of financial aid shall be considered when received by the participant when determining the need for transportation services. Educational loans or work study program awards shall be excluded from consideration when determining supportive services needs.
2. Transportation services shall not be denied or reduced if the participant indicates that the financial aid is not available to meet transportation needs.
3. All determinations shall be documented regarding consideration of a participant's educational grants, scholarships and awards in the case file.
4. Written agreements with financial aid offices at educational institutions should be attempted in order to avoid duplication of supportive services. Any agreement with the institution shall include, but not limited to, the following: A description of the supportive services to be provided by each party, a provision for amendment and modification as necessary, and a provision that supportive service needs will be evaluated on a case-by-case basis.