# Senate Bill 1041 Implementation Field Monitoring Visit Summary

**Kern County** 

Visit Date: November 12, 2013

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES
Welfare to Work Division
Todd R. Bland, Deputy Director

#### **Kern County**

# Senate Bill (SB) 1041 Implementation Field Monitoring Visit Summary

#### **Executive Summary**

### **Purpose of Field Monitoring Visit**

The purpose of the Senate Bill (SB) 1041 implementation field monitoring visit is to obtain information regarding the county's progress in implementing program changes enacted by SB 1041 (Chapter 47, Statutes of 2012).

# **Scope of Field Monitoring Visit**

Specifically, the California Department of Social Services (CDSS) will review how each County Welfare Department (CWD) implemented SB 1041 program changes, including but not limited to:

- New Welfare to Work (WTW) participation requirements;
- WTW 24-Month Time Clock;
- Reengagement of the short term young child exempt population (Assembly Bill [AB] X4 4 group);
- CWD staff knowledge of SB 1041 changes;
- Training provided to staff in order to implement these changes; and
- Any pertinent data related to these program changes that are available.

#### **Goals of Field Monitoring Visit**

The CDSS' goals are to ensure that SB 1041 is being implemented correctly by each CWD, to gather promising practices in regards to implementation, to share these promising practices (when able) amongst all CWDs throughout the State, and to determine whether systematic or program issues relating to the integration of SB 1041 changes into the existing California Work Opportunity and Responsibility to Kids (CalWORKs) and WTW program exist throughout the state. If such issues exist, they will be addressed by the SB 1041 Oversight Workgroup.

#### **County Visit General Information**

This one-day field monitoring visit was performed in Kern County on Tuesday, November 12, 2013 at the Kern County Department of Human Services office in Kern, CA. The field monitoring visit team included three staff from the CDSS, Welfare to Work Division, CalWORKs Employment and Eligibility Branch along with Kern County's Assistant Director of Employment and Financial Services, Assistant Director of Administrative and Program Support, Welfare to Work Program Director, county caseworkers (Social Services Workers), training and development staff, and various other CalWORKs program managers. The field monitoring visit consisted of a kick-off meeting, close-out meeting, staff and administrator interviews, and case management observations with county staff.

#### **Implementation Strategies**

Kern County's implementation strategy consisted of a step by step, comprehensive approach to inform staff of SB 1041 related program changes which included Policy Implementation Memoranda, class room style training for supervisors and lead workers, and the creation of various comprehensive job aids and forms.

Kern County began preparing its staff for SB 1041 implementation in the Fall of 2012. Class room style training was provided to all staff in small groups starting in September 2012. In May 2013 supervisors and lead workers were trained on the WTW 24-Month Time Clock requirements, comprehensive discussions for transitioning clients, WTW 24-Month Time Clock stopping conditions, and post WTW 24-Month Time Clock participation requirements. Reengagement of short term young child exempt (AB X4 4) client training was given in May 2013 and again in June 2013. All SB 1041 related training was offered to both central Kern metropolitan staff and out stationed staff in rural offices.

Information on SB 1041 implementation was distributed in the form of handouts and all staff correspondence prior to each training session. Official guidance via Policy Implementation Memoranda would follow training. Kern County used a variety of methods to best prepare its Social Services Workers for explaining these program changes to clients including job aids and specialized request forms. Kern County also utilized a log system to track its reengagement progress.

#### **Successes**

Kern County's step by step approach to implementation of SB 1041 was well organized and comprehensive. Kern developed an extensive amount of informative documents which thoroughly explained the program changes and the impact on tasks carried out by its Social Services Workers. The overall structure and depth of these documents appeared to benefit Kern County's implementation of SB 1041 program changes. Kern also offered various training opportunities to staff on program changes, ranging from class room style training to informal staff meetings where implementation strategies and potential challenges and questions could be discussed openly. Kern County also created various comprehensive job aids and forms that were used by its Social Services Workers to assist clients in understanding program options.

Kern County currently has a job club program in place, known as the Employment Zone (EZONE) which all clients are required to attend as part of their upfront activities. Kern County also conducts a five-day workshop, OASIS, as a front-end client activity to identify behavioral health issues. Both of these activities appear to be promising county practices, assuring clients receive the services they need in order to become job ready.

#### **Key Recommendations**

Kern County should continue to collect data on SB 1041 implementation and pay close attention to the data which is submitted through its consortium system to the CDSS for the monthly CalWORKs

Cash Grant Caseload Movement Reports (CA 237 CW), and CalWORKs WTW Monthly Activity Reports for All (Other) Families and Two Parent Families (WTW 25/25A). These sources are relied upon heavily by the CDSS to track and measure program progress.

At the time of this visit CDSS recommended that Kern County consider expanding its outreach efforts to clients who were partially participating or not participating in WTW in order to continue encouraging client participation in CalWORKs WTW activities and services. Since this FMV visit, Kern County has established a sanction reengagement workgroup with the purpose of examining this issue and providing recommendations on how to best engage non-participating WTW clients. The CDSS also recommends that Kern County continue to work towards implementing the new hourly participation requirements correctly (weekly requirement versus monthly requirement), and integrating the new CalWORKs federal standards into its WTW program. The CDSS does acknowledge the potential difficultly CWDs and the state may face in meeting WPR following the implementation of SB 1041 program rules due to the new weekly hourly participation requirements.

Considering the high rate of clients in Kern County with no High School Diploma/Equivalency, at the time of this visit CDSS also recommended that Kern continue to work towards fostering a relationship with its local Adult Schools, Community Colleges, and alternative education resources in order to secure means by which its CalWORKs clients can access these resources with ease through WTW services. To date, Kern County is in the final stages of formalizing two partnerships it hopes will help address the high rate of clients with no High School Diploma/Equivalency. One partnership is with a local Adult Literacy Council to provide tutoring for student clients preparing for the General Education Development (GED) test. The second partnership is with a company called Spiranomics to provide long distance learning opportunities for student clients preparing for their GED test.

#### **Acknowledgments**

The CDSS thanks the Kern County Department of Human Services for hosting this field monitoring visit. The CDSS appreciates the open collaboration with CWD staff to ensure the continued success of the CalWORKs program.

# **Field Monitoring Visit Summary**

#### Introduction

#### **Purpose of Field Monitoring Visit**

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# **Scope of Field Monitoring Visit**

Specifically, the California Department of Social Services (CDSS) will review how each County Welfare Department (CWD) implemented SB 1041 program changes, including but not limited to:

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- Reengagement of the short term young child exempt population (Assembly Bill [AB] X4 4 group);
- CWD staff knowledge of SB 1041 changes;
- Training provided to staff in order to implement these changes; and
- Any pertinent data related to these program changes that are available.

### **Goals of Field Monitoring Visit**

The CDSS' goals are to ensure that SB 1041 is being implemented correctly by each CWD, to gather promising practices in regards to implementation, to share these promising practices (when able) amongst all CWDs throughout the state, and to determine whether systematic or program issues relating to the integration of SB 1041 changes into the existing California Work Opportunity and Responsibility to Kids (CalWORKs) and WTW program exist throughout the state. If such issues exist, they will be addressed by the SB 1041 Oversight Workgroup.

#### **County Visit General Information**

This one-day field monitoring visit was performed in Kern County on Tuesday, November 12, 2013 at the Kern County Department of Human Services office in Kern, CA. The field monitoring visit team included three staff from the CDSS, Welfare to Work Division, CalWORKs Employment and Eligibility Branch along with Kern County's Assistant Director of Employment and Financial Services, Assistant Director of Administrative and Program Support, Welfare to Work Program Director, county caseworkers (Social Services Workers), training and development staff, and various other CalWORKs program managers. The field monitoring visit consisted of a kick-off meeting, close-out meeting, staff and administrator interviews, and case management observations with county staff.

#### **Background and Data**

#### Kern at-a-glance

Total Caseload	19,953
(Source: CalWORKs Cash Grant Caseload Movement Report [CA 237 CW] Line Item 8-August 2013)	
WTW Enrollees	4,803
(Source: CalWORKs Welfare to Work Monthly Activity Report [WTW 25/25A] Line Item 1-August 2013)	
Mandatory Participants (enrollees + sanctioned + non-compliance)	9,241
(Source: CalWORKs Welfare to Work Monthly Activity Report [WTW 25/25A] Line Item 1, 3A, and 31-Augu	ıst 2013)
Reengagement Plan Received	Yes
Beginning Date of Reengagement	June 2013
Consortium System	C-IV

# Data/Statistics Available at Time of Field Monitoring Visit

- Clients with more than 24 months left on their CalWORKs 48-month time limit as of January 1, 2013 who have had their comprehensive discussion: 243
- Clients with more than 24 months left on their CalWORKs 48-month time limit as of January 1, 2013 who have not yet had their comprehensive discussion: 448
- Clients with <u>less than</u> 24 months left on their CalWORKs 48-month time limit as of January 1, 2013 who <u>have had</u> their comprehensive discussion: 849
- Clients with <u>less than</u> 24 months left on their CalWORKs 48-month time limit as of January 1, 2013 who have not yet had their comprehensive discussion: 126
- Clients who have elected to change their WTW Plans as a result of the SB 1041 new participation requirements: 118
- Sanctions that were cured as a result of SB 1041: Nine
- Clients in the reengagement process (i.e. scheduled to attend a reengagement appointment, completing assessment, completing the comprehensive discussion, signing a post-assessment WTW Plan): 1,209
- Clients who have met the definition of reengaged: 195 (of the 1,209)
- As of October 2013, the show rate for clients scheduled to attend a reengagement appointment: Approximately 32%
- As of October 2013, number of reengagement clients sanctioned for failure to appear for scheduled appointments: 97
- Clients who have elected to take the New Young Child Exemption: 1,036
- Clients who have elected to take the New Young Child Exemption who were originally part of the reengagement population: 197 (of the 1,036)

#### **PLEASE NOTE:**

- All data was taken at a point in time, as of October 2013.
- This information was manually compiled using the C-IV Program Inventory Report function.
- The first four bullets account for all active WTW clients aided as of 1/1/2013 and required to have a comprehensive discussion.

# **Summary of Documents provided by Kern County**

- Kern County Policy Implementation Memoranda relevant to SB 1041 program changes.
- SB 1041 related training materials including instructional procedure handouts, follow-up question and answer documents, training sign-in sheets and other relevant training materials.
- CalWORKs notifications including informing notices and appointment letters provided to clients relevant to SB 1041 implementation.
- Kern County created request forms related to SB 1041 implementation (New One Time Young Child Exemption Request Form and the End of New Young Child Exemption – Request for Early Reengagement Form).
- Kern County's updated Welfare to Work Handbook (in English and Spanish).
- Various scripts and other job aids provided to staff for use during comprehensive discussions.
- Kern County's Assembly Bill (AB) X4 4 Short Term Exemption Reengagement Sequencing Plan.
- Instructional and clarifying email correspondence with all staff regarding SB 1041 implementation.

# **County Administrator and Caseworker Interviews**

The CDSS field monitoring team used the county administrator and caseworker interview tools released in All County Information Notice (ACIN) I-42-13 to interview the Kern County administrator and Social Services Workers in-person regarding SB 1041 implementation. The tools were provided to the Kern County administrator and Social Services Workers in advance of the visit. The administrator interview panel consisted of three CDSS staff and two county administrators. The Social Services Worker interviews were conducted by two teams of CDSS staff members (one team of two CDSS staff members, and one team of a single CDSS staff member) with each team interviewing one Social Services Worker.

# **Summary of Observations**

#### WTW 24-Month Time Clock Implementation and New WTW Participation Requirements

#### **Transitioning Clients**

[Less than and more than 24 months left on their CalWORKs 48-month time limit as of January 1, 2013]

Kern County issued the *New Rules for CalWORKs WTW Activities Informing Notice* (CW 2205) through the C-IV consortium system on November 9 and 10, 2012. Kern County began comprehensive discussions with clients, regardless of time on aid, in May 2013. Prior to the visit, the county's target completion date for all applicable client outreach was November 30, 2013. Due to further clarification provided by the CDSS at the time of this visit regarding All County Letter (ACL) 12-57 client outreach requirements, Kern County estimates that it did in fact complete all comprehensive discussions with applicable clients by June 30, 2013.

In Kern County, clients were scheduled for in person appointments to complete the comprehensive discussion. If a client could not attend an appointment due to work or school, his or her Social Services Worker was permitted to conduct the comprehensive discussion over the

telephone. The CW 2205 alongside a Kern County developed job aid (WTW 24-Month Time Clock Comprehensive Discussion job aid) were used by Kern's Social Services Workers to explain the new program requirements and WTW 24-Month Time Clock to clients. This job aid was distributed to staff via Policy Implementation Memorandum No. 13-22 (July 1, 2013). Social Services Workers documented each comprehensive discussion in the C-IV case journal narrative.

During the comprehensive discussion, if the client chose to change his or her WTW Plan and take advantage of the new WTW program flexibility, each Social Services Worker was instructed to utilize client assessment results to determine which WTW activities were appropriate in order for the client to achieve his or her employment goal. Once a new WTW Plan Activity Assignment Form (WTW 2) was signed by the client, the Social Services Worker would create the client's WTW 24-Month Time Clock in C-IV and issue the client a Your WTW 24-Month Time Clock Notice (CW 2208).

Kern reported that very few transitioning clients chose to change their assigned activities. Clients who did change their activity assignments tended to take advantage of the flexibility permitted by the WTW 24-Month Time Clock in order to participate in education/training activities previously not permitted by former CalWORKs WTW core/non-core participation requirements. Overall, Kern reported that some clients took advantage of the option to utilize the flexibility of their WTW 24-Month Time Clock, but most chose to participate according to CalWORKs federal standards in order to preserve their WTW 24-Month Time Clock for future use.

#### Clients who failed to attend SB 1041 appointments

Kern County's action towards clients who were unresponsive to contact varied depending on the client's situation. Clients with existing WTW Plans were sent a letter which included a copy of the CW 2205 and a new WTW 2 reflecting their current activities. These clients were requested to sign the new WTW 2 and return it to their assigned Social Services Worker within 30 days. If the client did not return his or her new signed WTW 2 or attempt to contact his or her Social Services Worker within the 30 days, the client's WTW 24-Month Time Clock would be created in C-IV and start the first of the following month (if applicable). Clients without existing WTW Plans were sent an appointment letter to meet with their assigned Social Services Worker in order to discuss options and sign a new WTW 2. If the client failed to attend this appointment and failed to make contact with his or her Social Services Worker, the compliance process was initiated.

#### **General Comments**

Social Services Workers would utilize C-IV ad hoc reports to track completion of comprehensive discussions. Each case was reviewed to see if an assessment had been completed for the client. If not, the client was referred to Foster Assessment (Foster Assessment Center and Testing Services, Inc.), a service provider Kern County contracts with to provide vocational evaluation services for Kern County WTW clients. These services take the form of Two Day Vocational Assessments during which clients are evaluated on their vocational/occupational interests, achievement grade levels, and cognitive/general learning ability.

Once the assessment was completed or for client's who had already went through the assessment process, the Social Services Worker would review the results, conduct a comprehensive discussion with the client, and assign the client to appropriate activities based on his or her specific assessment results. At this time, the Social Services Worker would also discuss the client's individual goals. Goal discussion also regularly takes place during each client's initial appraisal appointment, as well as during the Social Services Worker's monthly contact with the client.

Strategies for completing comprehensive discussions and the order by which to contact clients was determined based on individual Social Services Worker and supervisor strategies. Each Social Services Worker is assigned an average of 70 cases. Sanction cases are not actively managed by Social Services Workers. Exemption cases are managed by a specialized group called the TRAC Team which is responsible for monitoring WTW exemptions and referring clients back to WTW services once their exemption ends.

#### **New Young Child Exemption**

Information regarding the New Young Child Exemption was distributed to Kern County WTW staff beginning in late December 2012. Kern County developed a special request form for this particular exemption in order to streamline the request process (*New One Time Young Child Exemption Request Form*). All eligible clients were provided with this form alongside the *CalWORKs Exemption Request Form* (CW 2186A) and asked to complete it as a means to confirm and document the client's decision of whether or not to take the exemption. This form ensures that clients who elect to take this new exemption are offered the opportunity to volunteer to participate in WTW.

If and when a client elects to take this exemption, his/her case is transferred to the TRAC Team for management. Supervisors review each case prior to its transfer to the TRAC Team. As well, the TRAC Team reviews each case upon receipt to ensure procedures were followed correctly. According to C-IV data presented at the time of this field monitoring visit, approximately 1,036 clients in Kern County had elected to take the New Young Child Exemption.

# **Clients with Good Cause for Lack of Supportive Services**

Kern County did not utilize the AB X4 4 option to provide clients with WTW good cause due to lack of supportive services with a CalWORKs 48-month time limit exemption.

#### The New WTW Plan Activity Assignment Form (WTW 2)

The new WTW Plan Activity Assignment Form (WTW 2) was made available via the CDSS website December 2012. In January 2013, Kern County added this new version of the WTW 2 to its internal database which allowed staff to generate the form prior to full C-IV automation. Social Services Workers were instructed to utilize the new form and image signed versions into C-IV.

#### **General Comments**

The Kern County Social Services Workers who were interviewed during this field monitoring visit noted that the expanded supportive services section of the WTW 2 has helped clients understand the services available to them. The activity assignments section was also noted as improved because it now clearly documents the client's schedule of activities.

The Social Services Workers also noted that completing the front page of the WTW 2 which includes double columns, reflecting the two different types of participation requirements (WTW 24-Month Time Clock and CalWORKs federal standards) is difficult for Self-Initiated Program (SIP) and volunteering clients. Also, the Social Services Workers noted that while clients do appear to have an adequate understanding of the new form, it is a long form that contains a lot of information. They have found it beneficial, upon completing the WTW 2 with the client, to review the form highlighting the most important sections for the client in order to assure client comprehension of requirements.

#### **Reengagement Process**

Kern County established a specialized unit of Social Services Workers in April 2013 to work on reengaging short term young child exempt (AB X4 4) clients back into the WTW program. Kern County's Reengagement Sequencing Plan was as follows:

June 2013 - First, engage clients who are currently volunteering to participate in WTW activities. Second, engage clients who are in two parent assistance units where the second parent is mandatory and assigned to participate in WTW activities. Third, engage clients who have

reported earnings and/or are receiving financial aid.

- July 2013 Engage clients who may qualify for the New Young Child Exemption.
- December 2013 Engage clients who do not qualify for the New Young Child Exemption and are required to participate in WTW activities.

Kern County began issuing the *Young Child Exemption Ends December 31, 2012 - New Rules for CalWORKs WTW Activities Informing Notice* (CW 2206) to its first sequencing group of reengagement clients in January 2013. Once noticed individual clients were assigned to a reengagement Social Services Worker. A specialized reengagement orientation was developed in order to provide required WTW program information to this population. These orientations served as a means for the client to become re-familiarized with program requirements and services, and to meet with his or her assigned reengagement Social Services Worker for an initial reengagement evaluation. A few days prior to every client's scheduled reengagement orientation, his or her reengagement Social Services Worker contacted him or her via telephone (3rd contact) in order to remind the client of the orientation and to answer any questions the client had.

After the reengagement orientation, the assigned reengagement Social Services Worker met with each client to determine where in the WTW flow the client should be placed (in pre-assessment or post-assessment activities depending on the client's circumstances). At this time the client was

provided with the number of months remaining on his or her CalWORKs 48-month time limit. The client was also provided with the *New Rules for CalWORKs WTW Activities Informing Notice* (CW 2205), the *CalWORKs Exemption Request Form* (CW 2186A) and the *New One-Time Young Child Exemption Request Form* (if applicable). If the client did not have an assessment on file at the time of this appointment, he or she was referred to Foster Assessment for a Two Day Vocational Assessment.

Once the assessment was completed or for client's who already had an assessment on file, the reengagement Social Services Worker would have a comprehensive discussion with the client regarding participation options. At this point a WTW Plan was developed with that client. Once signed the reengagement Social Services Worker would then create the client's WTW 24-Month Time Clock in C-IV and issue the *Your WTW 24-Month Time Clock Notice* (CW 2208) to the client.

After verifying the client attended his or her first assigned activity, the reengagement Social Services Worker would transfer the case to an ongoing Social Services Worker (within five working days of verification). Reengagement Social Services Workers were required to maintain a reengagement log to track the status of their caseload and submit a monthly report to their supervisor on caseload status. Each supervisor was also instructed to randomly review cases to ensure correct implementation of reengagement procedures. If a client did not attend his or her reengagement orientation or contact his or her reengagement Social Services Worker, the compliance process was initiated. If at any time in the process a client met criteria for another WTW exemption and the exemption was granted, then the case was referred to the TRAC Team for management.

Clients who wanted to reengage back into WTW prior to their sequencing timeframe were provided with the *End of New Young Child Exemption – Request for Early Reengagement* Form. This form provided the client with information regarding participation requirements, explained rights and responsibilities, informed the client that this action would begin counting time towards his or her applicable time clocks/limits, etc. The client at this time would also be provided with the CW 2206, CW 2186A, and (if applicable) the *New One Time Young Child Exemption Request Form*. If the client refused to sign the *End of New Young Child Exemption – Request for Early Reengagement Form*, he or she would be reengaged according to Kern County's original sequencing plan.

#### **General Comments**

Kern County experienced a high no show rate for the reengagement orientation (approximately 68% of scheduled clients do not attend). This resulted in a high rate of non-compliance initiations. Also, the reengagement Social Services Workers found it challenging to motivate these clients to participate in the reengagement process. It is believed this is due to the length of this particular exemption (many of these clients have been exempt from WTW since 2009).

#### **Implementation Strategies**

Kern County's implementation strategy consisted of a step by step, comprehensive approach to inform staff of SB 1041 related program changes which included Policy Implementation Memoranda, class room style training for supervisors and lead workers, and the creation of various comprehensive job aids and forms.

Kern County began preparing its staff for SB 1041 implementation in the Fall of 2012. Class room style training was provided to all staff in small groups starting in September 2012. Class room style training was also provided in January 2013 to all supervisors and lead workers from each unit on how to complete the new WTW Plan Activity Assignment Form (WTW 2). Policy Implementation Memoranda followed and provided staff with a comprehensive break down of how to integrate the new SB 1041 program elements into Kern County's existing WTW program. Kern County WTW staff were informed of new procedures relating to the New Young Child Exemption via staff correspondence, during informal supplementary training for supervisors during Division staff meetings throughout January 2013, and through Policy Implementation Memorandum.

In May 2013 supervisors and lead workers were trained on the WTW 24-Month Time Clock requirements, comprehensive discussions for transitioning clients, WTW 24-Month Time Clock stopping conditions, and post WTW 24-Month Time Clock participation requirements. Implementation of the WTW 24-Month Time Clock was delayed until May 2013 purposefully. Kern was awaiting (1) additional CDSS clarification regarding whether scheduled versus actual hours would be used to determine the behavior of the WTW 24-Month Time Clock and (2) automation of WTW 24-Month Time Clock stopping codes. Reengagement of short term young child exempt (AB X4 4) client training was given first to the specialized reengagement team in May 2013. Other supervisors and clerical staff throughout Kern County were trained on these policies in June 2013. Kern County used the CDSS developed SB 1041 training aid, released in ACIN I-08-13 as well as developing its own training materials. All SB 1041 related training was offered to both central Kern metropolitan staff and out stationed staff in rural offices.

Information on SB 1041 implementation was distributed in the form of handouts and all staff correspondence prior to each training session. Official guidance via Policy Implementation Memoranda would follow training. Additional clarification was provided to supervisors at biweekly division staff meetings. After attending training as well as bi-weekly division supervisor meetings, supervisors and lead workers for each unit provided training to front line staff at their respective unit meetings. Supervisors continue to perform targeted case reviews each month in order to assure correct implementation of SB 1041 procedures. Additional clarification has also been provided at supervisor staff meetings as it is received from the CDSS.

Kern County used a variety of methods to best prepare its Social Services Workers for explaining these program changes to clients. A job aid was developed and provided to Social Services Workers in order to ensure all components of the comprehensive discussion were covered with each client (the WTW 24-Month Time Clock Comprehensive Discussion job aid). As mentioned in previous sections, Kern County developed two special request forms for clients. The first form, the New One Time Young Child Exemption Request Form was provided to all clients eligible for the

New Young Child Exemption. This form helped streamline this request process and provided clients with information regarding the particulars of this exemption. The second form, the *End of New Young Child Exemption – Request for Early Reengagement Form* was given to clients interested in reengaging early into the WTW program, prior to their designated reengagement sequencing timeframe. It clearly laid out options and program rights assuring each client interested in bypassing the official process would have the information they needed in order to make an informed decision. Kern County also utilized a log system to track reengagement progress.

#### **General Comments**

Prior to implementation of SB 1041, Kern County implemented a monthly approach to calculating WTW participation hours for clients. This approach was based on clients meeting a weekly average participation requirement (20/30/35 average per week). Clients were required to meet a monthly participation requirement of 87/130/140. This was done to benefit clients by allowing for irregular work schedules and as a WPR strategy.

While the CDSS acknowledges the benefit of calculating clients work participation based on a monthly hourly requirement and the flexibility that such a policy allows for clients, ACLs 12-69 and 13-59 state that client participation shall be based on a weekly participation requirement and that, in particular, CalWORKs federal standards are calculated based on clients meeting a weekly minimum for participation (20/30/35). Kern commented that it is still working toward integrating all aspects of SB 1041 program changes into its WTW program, will continue to work towards incorporating this nuance, and that clients will not be sanctioned for failing to meet the monthly participation requirement if they are meeting the weekly minimum requirement of 20/30/35.

#### **Case Reviews**

The CDSS field monitoring team reviewed five cases selected by Kern County in advance of the visit. The purpose of this component of the visit was to review how SB 1041 program changes were being integrated into case management, understand how SB 1041 policies were being operationalized by individual Social Services Workers, and better comprehend case management within Kern County.

There were five specific case types requested:

- Case One A client with less than or equal to 24-months left on the CalWORKs 48-month time limit as of January 1, 2013;
- Case Two A client with more than 24-months on the CalWORKs 48-month time limit as of January 1, 2013;
- Case Three A new client (beginning date of aid January 1, 2013 or later);
- Case Four A client who was sanctioned, had reported earnings and whose case was curable based on the new participation requirements (preferably a case actually cured since January 1, 2013 based on new participation requirements); and

Case Five - A client that was part of the short term young child exemption (AB X4 4) population, and is in the process of or has been reengaged (if applicable).

#### **General Comments**

Kern County uses the C-IV case management system. The following is a summary of the case findings:

#### Noticing Requirements

All noticing requirements for the *New Rules for CalWORKs WTW Activities Informing Notice* (CW 2205) and *Your WTW 24-Month Time Clock Notice* (CW 2208) were met for all cases reviewed.

#### • Comprehensive Discussions and Additional Outreach

The two transitioning cases reviewed had both received a comprehensive discussion during an in person appointment with their respective Social Services Worker. Notation of these discussions was found in the case journal narrative section of C-IV.

# WTW Plan Activity Assignment Form (WTW 2)

All case files reviewed with WTW Plans developed on or after January 2013 (new case, both transitioning cases, and reengagement case) used the new WTW 2. The sanction case reviewed did not have a WTW 2 on file due to the client's failure to show up for his/her orientation/appraisal.

#### Sanction Case

For the sanction case, Kern County was able to cure the client's sanction automatically based on reported earnings and issued supplements accordingly. The client was scheduled for an orientation/appraisal appointment shortly after the curing, but failed to appear. The client has continued to fail to appear for subsequent appointments, which has resulted in the client falling back into non-compliance.

#### Reengagement Case

The case reviewed met all reengagement noticing requirements, including the *Young Child Exemption Ends December 31, 2012 - New Rules for CalWORKs WTW Activities* (CW 2206), timelines for the secondary contact/appointment, third contact reminder, etc. The client became fully reengaged back into the WTW program as of July 2013.

# New Young Child Exemption

Only one case reviewed was eligible for the New Young Child Exemption. The client though declined the exemption.

#### Conclusion

#### **Successes**

Kern County's step by step approach to implementing SB 1041 program changes was well organized and comprehensive. Kern developed an extensive amount of informative documents (Policy Implementation Memoranda) which thoroughly explained the program changes and the impact on tasks carried out by its Social Services Workers. The Policy Implementation Memoranda instructing staff on the new *WTW Plan Activity Assignment Form* (WTW 2) was especially well executed, including examples of common WTW Plan types and instructions on how to fill out the WTW 2 accordingly. Also, the Policy Implementation Memoranda for curing sanctions based on SB 1041 new program requirements included a tracking worksheet to be used by staff to track sanctions cured. The overall structure and depth of these documents appeared to benefit Kern County's implementation of SB 1041 program changes.

Kern also offered various training opportunities to staff on program changes, ranging from class room style training to informal staff meetings where implementation strategies and potential challenges and questions could be discussed openly. Kern County also created various comprehensive job aids (i.e. WTW 24-Month Time Clock Comprehensive Discussion job aid) and forms (New One Time Young Child Exemption Request Form and End of New Young Child Exemption – Request for Early Reengagement Form) that were used by its Social Services Workers to assist clients in understanding program options.

Kern County also redistributed staff in order to create a separate unit whose sole purpose was to reengage the short term young child exemption (AB X4 4) population. This action streamlined its reengagement procedures and allowed for these clients to receive reengagement services in a timely fashion. Also, Kern County submitted useful data for this field monitoring visit which has assisted the CDSS is better understanding the impact of SB 1041 program changes on the Kern County CalWORKs program.

Kern County currently has a job club program in place, known as the Employment Zone (EZONE), which all clients are required to attend as part of their upfront activities. This course varies in length depending on the client's needs and skill level, focusing on basic job skills during its initial stages, and later focusing on direct one on one coaching. The comprehensiveness and flexibility of the EZONE model appears to be very successful for Kern in placing clients in jobs and/or providing clients who struggle in the job market with the attention and services they need. Kern County also conducts a five-day workshop, OASIS, as a front-end client activity to identify behavioral health issues. The workshop also focuses on life skills such as self-esteem, stress management, decision-making, problem solving, interviewing, and money management. Many of these activities appear to be promising county practices, assuring clients receive the services they need in order to become job ready.

Lastly, Kern County holds its Social Services Workers to a set of performance measures negotiated with respective unions. Social Services Workers are expected to have contact with 100% of their clients each month. Also, Social Services Workers are expected to take necessary actions (sending

out notices, etc.) on 85% of their cases within five day timeframes. These types of performance measures appear to encourage timely and active case management in Kern County.

# **Challenges**

Kern County's greatest challenge was the limited time frame allowed for SB 1041 program change implementation, including the June 30, 2013 deadline established to complete outreach to all transitioning WTW clients. Prior to the visit, Kern County's target completion date for all applicable client outreach was November 30, 2013. Though, due to further clarification provided by the CDSS at the time of this visit regarding All County Letter (ACL) 12-57 client outreach requirements, Kern County estimates that it did in fact complete all comprehensive discussions with applicable clients by June 30, 2013.

Also the delay in the issuance of instruction by the CDSS was a hardship. Clarification on certain policy questions delayed the county's ability to begin the comprehensive discussion process with transitioning clients, implementing the new hourly participation requirements correctly, and implementing the new CalWORKs federal standards. Kern did note that the continued issuance of SB 1041 related Questions and Answer ACLs and other policy guidance provided by the CDSS has been beneficial.

#### **Key Recommendations**

Kern County should continue to collect data on SB 1041 implementation and pay close attention to the data which is submitted through its consortium system to the CDSS for the monthly CalWORKs Cash Grant Caseload Movement Reports (CA 237 CW), and CalWORKs WTW Monthly Activity Reports for All (Other) Families and Two Parent Families (WTW 25/25A). These sources are relied upon heavily by the CDSS to track and measure program progress.

At the time of this visit, Kern County did not make regular contact with sanctioned clients regarding engagement in WTW activities other than during required annual redetermination time periods. At the time of this visit CDSS recommended that Kern County consider expanding its outreach efforts to clients who were partially participating or not participating in WTW in order to continue encouraging client participation in CalWORKs WTW activities and services. Since this FMV visit, Kern County has established a sanction reengagement workgroup with the purpose of examining this issue and providing recommendations on how to best engage non-participating WTW clients. CDSS also recommends that Kern County continue to work towards implementing the new hourly participation requirements correctly (weekly requirement versus monthly requirement), and integrating the new CalWORKs federal standards into its WTW program. The CDSS does acknowledge the potential difficultly CWDs and the state may face in meeting WPR following the implementation of SB 1041 program rules due to the new weekly hourly participation requirements.

Considering the high rate of clients in Kern County with no High School Diploma/Equivalency, at the time of this visit CDSS also recommended that Kern continue to work towards fostering a relationship with its local Adult Schools, Community Colleges, and alternative education resources

in order to secure means by which its CalWORKs clients can access these resources with ease through WTW services. To date, Kern County is in the final stages of formalizing two partnerships it hopes will help address the high rate of clients with no High School Diploma/Equivalency. One partnership is with a local Adult Literacy Council to provide tutoring for student clients preparing for the General Education Development (GED) test. The second partnership is with a company called Spiranomics to provide long distance learning opportunities for student clients preparing for their GED test.

#### Contact

Melissa Kenney, *FMV Summary Author*CalWORKs Employment Bureau, Welfare to Work Division
California Department of Social Services
744 P Street, M.S. 8-8-33
Sacramento, CA 95814

Phone: (916) 654-0699

Email: Melissa.Kenney@dss.ca.gov