Attachment J

Children and Families Policy Forum
Family Support Task Force
Transportation Sub-committee

Focusing on individuals newly entering the workforce, the Transportation Sub-Committee met four times to review regional transportation, funding sources, demographic information on housing and jobs and alternatives to traditional transportation for affordability, accessibility and quality.

Task Force participants (attachment) included policy makers, transportation providers, consumer representatives and Social Services and Community Development Department representatives.

Task Force Process:
- Fact finding
- Issues identification
- Recommendations

Fact Finding-

Background information from individuals, departments, service providers and policy makers :

- Federal "Welfare to Work" and "Bridges to Work" programs
- Department of Transportation's ISTEA & Next Tea provisions
- California's Welfare Conference Reform Agenda, Item #152 "Public Transit Finance"
- Association for Housing and Community Development Committee's "California Housing Affordability Challenge"
- HomeBase report to the Regional Steering Committee on Homelessness and Housing
- Contra Costa County Social Services Department summary of regional transportation providers meeting
- North Richmond Employment Collaborative summary
- Schedules, routes and service descriptions
- CalWORKs county plan and planning process

Issues Identification-

Consumer/Workforce Issues:

- In the Bay Area, 63% of low income families spend more than 50% of their income on housing
- Housing and jobs are not contiguous. Jobs are located along the I-680 corridor and affordable housing is predominating in east and west county

- Only 10% of lower income families own cars leaving the remainder to rely on public transportation, ride-sharing or other options
- Many available entry level jobs are swing shift, graveyard or weekends making access to child care and transportation difficult
- Available public transportation generally accommodates traditional work day hours
- Often getting to work involves multiple transportation options with uncoordinated schedules, high costs and long commute times ie. up to 4 hours and $6/day

Transportation Providers Issues:

- Providers differ in organization, governance, funding, service areas, operating costs and scheduling. This makes coordination difficult.
- Assure that Social Service Dept. staff and others can assist clients with transportation planning via the Internet and printed schedules
- Demographic information and service delivery plans help facilitate desired changes in transportation delivery
- A key issue is to make transportation affordable for Welfare-to-Work participants
- Fixed-route transit cannot meet special transportation needs. Providing for work-related exceptions, such as, child care locations and non- traditional work hours is critical.
- Fixed-route planning is based on "productivity policy" (ridership)
- Program pilots must be revenue-neutral to providers

Policy Makers Issues:

- The Transportation Commission (MTC) worked with the legislative conference committee to develop flexibile criteria for transportation subsidies to best meet community needs through the CalWORKs program.
- Plan on a regional basis to meet the greatest needs and to link jobs to housing ie. improving Highway 4
- To access limited discretionary funds, submit concrete requests including what is needed and why for Federal action through MTC & CCTA
- Federal Funds bring constraints and special requirements ie. retrofitting vehicles used to transport children
- Support coordination between Federal agencies and their funding streams ie. Dept. of Transportation, Health and Human Services, Dept. of Labor and Dept. of Agriculture
- Work with Policy Makers to support desirable legislation ie. AB141 allowing employers tax incentives for purchasing bus passes for employees
- Assist community-based-organizations in applying for grants to subsidize transportation

Issues for further investigation:

- Tie into regional (Bay Area) planning to maximize service delivery and funding opportunities. NEXTEA's $100 million/year for six years will go to regions of 200,000 population for Welfare-to-Work transit projects
- Develop regional coordination of transit entities for greater efficiency and service delivery
- Share demographic information on housing, jobs and plans for service delivery with transportation providers through an overlay map
- Implement tokens/vouchers and/or discounted passes modeled on Santa Clara County's discounted monthly transit pass, the Regional Transit Coordinating Council's discount card, Bishop Ranch's bus pass and AC's home to school service
- Develop alternative transportation options ie. para transit (vans, shuttle buses, taxiis)
- Connect biking and public transportation
- Provide maintenance, lighting and helmets for bike commuters
- Develop change facilities for bikers at places of employment
- Investigate the use of child care funds for transporting of children to and from school and daycare
- Publicize car pool and van pool incentives to employees, employers and individuals
- Involve employers in the transportation planning and development process.
- Promote incentives to employers to improve the transportation delivery system, ie. 40% return to employer of revenue spent on passes, tax advantages from van pools, emergency vouchers for employees (up to 2 ea/month to work late, etc.)
- Increase the focus on community development and neighborhood preservation to increase economic opportunity
  Offer incentives for local jurisdictions to better plan and link jobs to housing ie. "Project Alpha" in San Diego incorporating homes, jobs and transportation

<u>Recommendations-</u>

Short Term:

- Investigate making transportation affordable and accessible using a token/voucher system.
- Financial incentives to employers who make transit passes available to their employees

- Develop mechanisms for teaching consumers how to use the transportation system:
    1. Social Services/PIC give program participants transportation information in orientation with one-on-one follow up.
    2. Provide computer-assisted trip planning training to program participants
    3. Expand kiosks and Internet-based trip planning (Trans-Link) being tested by MTC
- Ask transportation providers under what conditions services can be changed
- Employers/jobs locations, time frames, transportation support (Bruce Riordan/RIDES, Paul Maxwell/ TDM, B. McClary/Transportation Authority)

Priority issues for study and recommendation long term:

- Planning
- Identifying advocacy issues for policy makers
- Investment priorities from social service agencies
- Financial capabilities of transit agencies
- Accessing funds through coordination of separate funding streams ie., Private Industry Council grants from Dept. of Labor, Childcare Development Block Grant for child care resources, etc.

Family Support Task Force
Transportation Issue

NAME	ORGANIZATION	ADDRESS	PHONE	FAX
Anderson, Charles	WESTCAT	601 Walter Ave, , Pinole, Ca 94564	724-3331	724-5551
Aubry, Rick	Rubicon Programs, Inc.	2500 Bissell Ave, , Richmond, Ca 94804	235-1516	235-2025
Baskett, Lynn	Hosp. Council of NorCal	7901 Stoneridge Dr., Suite 500, Pleasanton, Ca 94588	227-3336	460-5457
Bernhus, Sharon	Shelter, Inc.	1070 Concord Ave., Concord, Ca 94518	827-3598 x 128	827-2028
Bonsall, Lisa	HomeBase	870 Market St., Suite 1228, San Francisco, Ca 94117	(415) 788-7961	
Bowlby, David	Congresswoman Tauscher's Off.	1801 N. California St., Ste 103, W C, Ca 94596	932-8899	932-8159
Brenner, Summer	WCCTAC	1 Alvarado Square, San Pablo, Ca 94806	215-3008	235-7059
Carr, Nick	Health Services Dept.	597 Center Ave., Suite 115, Martinez, Ca 94553	313-6814	313-6840
Chandler, Linda	CCC Private Industry Council	2425 Bisso Ln, , Concord, Ca 94520	646-5024	646-5517
Chiverton, Kathy	Supervisor Gerber's Office	309 Diablo Rd, , Danville, Ca 94526	820-8683	820-6627
Cromartie, Tim	Senator Lee's Office	1970 Broadway, Suite 1030, Oakland, Ca 94612	286-1333	286-3885
DeSaulnier, Mark	Board of Supervisors	2425 Bisso Ln, Suite 110, Concord, Ca 94520	646-5763	646-5767
Durkee, Joanne	Mt. Diablo Unified School Dist	1266 San Carlos Ave, , Concord, Ca 94518	685-7340 x 2722	687-8217
Estrada, Felicia	CCC Youth Commission	PO Box 1188, , Pittsburg, Ca 94565	427-1905	
Fabella, Danna	Social Service Dept.	40 Douglas Dr, , Martinez, Ca 94553	313-1583	313-1575
Flemer, Ann	Metro.Transport.Comm.	101 Eighth St, , Oakland, Ca 94607	464-7744	4647848
Foran, Mary	Health Service Dept.	20 Allen St, , Martinez, Ca 94553	370-5010	370-5098

NAME	ORGANIZATION	ADDRESS	PHONE	FAX
Gerber, Donna	Board of Supervisors	309 Diablo Rd., , Danville, Ca 94526	820-8683	820-6627
Gleich, Jim	AC Transit	1600 Franklin St, , Oakland, Ca 94612	891-7185	891-7157
Goldberg, Lisa	ABAG	PO Box 2050, Oakland, Ca 94604-2050	464-7993	464-7970
Goldsby, Bill	Community Services Dept.	2425 Bisso Ln., Suite 120, Concord, Ca 94520	646-5939	646-5551
Hatch, Carol	Congressman Miller's Office	367 Civic Dr, Suite 14, Pleasant Hill, Ca 94523	602-1880	674-0983
Hathaway, Sandy	Saint Vincent de Paul	2210 Gladstone Dr, , Pittsburg, Ca 94565	439-5060 x 26	439-7863
Hoffman, Kathy	Congressman Miller's Office	3220 Blume Dr, , Richmond, Ca 94806	262-6500	674-0983
Hoffman, Sara	County Administrator's Office	651 Pine St, 10th Floor, Martinez, Ca 94553	335-1090	646-1353
Jackson, Michael	Community Development Dept.	651 Pine St., 4th Floor, Martinez, Ca 94553	335-1278	335-1299
Kelley, Caroline	County Administrator's Office	651 Pine St, 10th Floor, Martinez, Ca 94553	335-1017	646-1353
Krieg, Jeanne	Tri-Delta Transit	801 Wilbur Ave, , Antioch, Ca 94509	754-6622 x 224	757-2530
Lacy, Sandy	Supervisor Gerber's Office	309 Diablo Rd, , Danville, Ca 94526	820-8683	820-6627
McBride, Janet	ABAG	PO Box 2050, Oakland, Ca 94604-2050	464-7955	464-7970
Miller, Jeanette	EDD, Labor Market Research	363 Civic Dr., Pleasant Hill, Ca 94523	602-1588	602-5023
Miller, Mary Kay	Social Service Dept.	40 Douglas Dr, , Martinez, Ca 94553	313-1614	313-1651
Omania, Gloria	Assemblyman Torlakson's Off.	815 Estudillo Ave, , Martinez, Ca 94553	372-7990	372-0934
Osborn, Lynn	TRANSPAC	100 Gregory Ln., Pleasant Hill, Ca 94523	671-5249	609-8853
Ponte, Steve	Tri-Delta Transit	801 Wilbur Ave., Antioch, Ca 94509	754-6622	757-2530
Ramacier, Rick	The County Connection	2477 Arnold Industrial Way, Concord, Ca 94520-2630	676-1976	686-2630
Renfrow, Kathy	Homeless Task Force and Vista	1213 Grove Way, Concord, Ca 94518	676-8403	687-7918
Riordan, Bruce	RIDES	60 Spear St., San Francisco, Ca 94105	(415) 281-4313	(415) 543-5660

NAME	ORGANIZATION	ADDRESS	PHONE	FAX
Roberts, Mary	BART	800 Oak St, , Oakland, Ca 94612	464-6102	287-4760
Sanchez, Lisa	SWAT	PO Box 5148, San Ramon, Ca 94583	275-2296	866-6173
Scott, Ariadne	Health Services Dept.	597 Center St., Suite 125, Martinez, Ca 94553	313-6818	313-6840
Strisower, Suzanne	Supervisor Uilkema's Office	651 Pine St, Room 108A, Martinez, Ca 94553	335-1046	335-1076
Tandy, Scott	Community Services Dept.	1220 Morello Ave, , Martinez, Ca 94553	313-7360	313-7385
Thon, Leah	TDT, Transit Planning	801 Wilbur Ave., Antioch, Ca 94553	754-6622	757-2530
Vovakis, Ernie	Community Development Dept.	651 Pine St, 4th Floor, Martinez, Ca 94553	335-1243	335-1299
Wallace, Joe	Health Services Dept.	597 Center Ave., Suite 100, Martinez, Ca 94553	313-6836	313-6841
Ward, Paul	Social Service Dept.	40 Douglas Dr, , Martinez, Ca 94553	313-1623	313-1651

Attachment
K

COMMUNITY
Wellness & Prevention
PROGRAM

Working in partnership with communities to promote wellness

DOMESTIC VIOLENCE AND WELFARE REFORM

As Contra Costa County designs and implements programs to comply with welfare reform, the county must consider how these programs will impact victims of domestic violence. It is important to acknowledge the fact that a large portion of women who receive welfare benefits are or have been victims of domestic violence. Without the financial assistance that welfare provides, many of these women would not have been able to leave their batterers. As welfare reform goes into effect and benefits become more difficult to obtain, many women may find themselves trapped in abusive relationships because they lack the economic resources to leave. As several recent studies have shown, domestic violence is a concern for a large number of welfare recipients:[1]

- A study conducted in Passaic County, New Jersey from 1995-97 found that of 846 female AFDC recipients who had been mandated to participate in education, training, or job-related activities, 14.6% reported that they were currently experiencing physical abuse from an intimate partner and 57.3% reported that they had experienced abuse at some point in their adult lives.

- In 1996, a Massachusetts study of 734 women receiving AFDC found that 19.5% of these women were currently experiencing domestic violence while 64.9% of them had been abused at some point in their adult lives.

- A study of both homeless and housed female AFDC recipients in Worcester, Massachusetts revealed that the incidence of domestic violence was high in both populations. Thirty two percent of the women had been abused within the previous 2 years, and 61% had experienced abuse at some point in their adult lives.

While welfare receipt does not cause domestic violence, the economic constraints faced by battered women on assistance may make it particularly difficult to leave an abusive relationship. It is clear that the dynamics of domestic violence create barriers to employment. The studies cited above found that women who have experienced domestic violence are three times as likely to face active interference from their partners in their work-related activities. These women also have higher rates of depression and post-traumatic stress disorder, are more likely to abuse alcohol or other drugs to cope with the violence in their lives, tend to have low self-esteem, display more symptoms of emotional distress, and

Bicycle Safety Projects
Breast Cancer Partnership/ Breast Cancer Early Detection Program (BCEDP)
Childhood Injury Prevention Project (CIPP)
Food & Nutrition Policy Consortium (FNPC)
Food Security Project
Go Bike! Bicycle Planning and Promotion Project
Healthy Neighborhoods Project
Lead Poisoning Prevention Project
Nutrition and Physical Activity Projects
Public and Environmental Health Advisory Board (PEHAB)
Tobacco Prevention Project
Violence Prevention Projects

[1] Raphael, Jody, and Tolman, Richard M. *Trapped by Poverty/Trapped by Abuse: New Evidence in the Relationship Between Domestic Violence and Welfare.* Project for Research on Welfare, Work, and Domestic Violence, Chicago, 1997.

Contra Costa County
Health Services Department
Public Health Division
597 Center Avenue, Suite 115
Martinez, CA 94553
tel: 510.313 6808
fax: 510.313 6840
e-mail. HN0051@handsnet.org

have higher rates of physical disability. These barriers may keep many women from meeting the new work requirements which are a part of welfare reform.

If abused women are denied benefits, they may be forced to remain financially dependent upon their batterers and stay in a dangerous relationship. For this reason, as the county designs its plan for implementation of welfare reform, it must be particularly sensitive to domestic violence situations.

Aspects of welfare reform that are of particular concern to victims of domestic violence include:

- Identifying domestic violence
- Implementation of the new work requirements and time limits
- Child support enforcement
- Issues for pregnant and parenting teens
- Issues for immigrants

I. Domestic Violence and Welfare Reform: Identifying Domestic Violence

Problem:

For a number of reasons, many women may not readily identify themselves to service providers as victims of domestic violence. A victim of domestic violence may be reluctant to discuss the issue with someone she feels may not take her seriously, discount her experience, perceive her as deserving the abuse, or blame her for staying with her abuser. A woman may fear that disclosing abuse will jeopardize her safety and eliminate her means of support. She may feel protective of her batterer or stay in the relationship hoping that the situation will improve. In addition, a woman's cultural, ethnic, or religious background may influence her willingness to speak about domestic violence.

Recommendations:

It is important that DSS develop protocols requiring that:

- *Victims of domestic violence be given many opportunities to self-identify;*[2]
- *Clear information about the possibilities of exemptions and special services for domestic violence and the procedures for applying for these exemptions and services be given to all women both orally and in writing, regardless of whether or not they admit to abuse;*[3]
- *A list of local domestic violence referrals be given to all women regardless of whether or not they self-identify, and a more comprehensive review of available resources be done with all women who do disclose abuse;*
- *All information that clients disclose be kept confidential in order to protect women's safety;*
- *DSS workers act in a supportive manner and validate women's experiences with domestic*

---

[2] After trainings have been conducted for DSS workers on domestic violence, the department may also want to consider implementing routine screening procedures. However, many women may not feel comfortable or safe disclosing abuse to a DSS worker. Therefore, DSS should strive to create an environment where women will be willing to self-identify, but under no circumstances should a woman be penalized if she does not disclose abuse initially, particularly if she chooses to do so later.

[3] Notification should include, at minimum, information about Family Violence Option waivers which allow for any program requirement to be waived if it increases a woman's risk of abuse, good cause exceptions to participation in welfare-to-work activities, good cause exceptions to establishment of paternity and child support orders, information for immigrants on the provisions of the Violence Against Women Act, and exceptions to deeming requirements for immigrants who are victims of abuse.

violence, emphasizing the fact that the abuse is not the woman's fault;

- *Welfare-to-Work programs encourage victims of abuse to self-identify and refer abused clients to appropriate services.*

All staff, including staff at Welfare-to-Work programs, should be trained on domestic violence and the effective implementation of these protocols.

Problem:

Because domestic violence usually occurs in private settings, there are often no witnesses to the abuse other than the two people who are involved. This needs to be taken into consideration when DSS determines what will constitute proof that a woman has been abused. While it may seem reasonable to require evidence such as a police report to confirm that a woman is being abused, such a requirement is unrealistic and would exclude many women who rightfully deserve the exemptions and services that should be provided to domestic violence victims. Women may choose not to make police reports if they fear retaliation from their partner or if they have had prior experiences of discrimination (particularly in communities of color).

Recommendation:

Documentation such as use of Battered Women's Alternatives' services, medical records, social service agency reports, restraining orders, testimony of other witnesses, or a woman's own testimony should be taken as sufficient proof that abuse has occurred. DSS should never contact the perpetrator of abuse or any other individual that the victim feels is unsafe to contact.

II. Domestic Violence and Welfare Reform: Work Requirements and Time Limits

Problem:

The new law requires that CalWORKs recipients work within 18-24 months of receiving assistance. Failure to comply with these regulations may result in a reduction or loss of aid. Domestic violence can be a serious obstacle to meeting this requirement. Women who are currently being abused are often unable to work outside of the home because their batterers will not let them. A batterer may make it difficult or even impossible for his partner to educate herself or work by not allowing her to study, harassing her while she is at work, making her miss appointments or classes, threatening her with physical abuse, etc. Additionally, many women who have experienced abuse suffer from post-traumatic stress disorder, low self-esteem, depression, and lack of job skills, all of which may keep them from complying with work requirements.

Recommendation:

Work requirements should be waived for women who are unable to meet them due to domestic violence.

Problem:

The new law imposes a five year lifetime limit on all benefits. Because welfare can be critical for women trying to escape abusive relationships, strictly enforced time limits on welfare aid could leave many women without the financial means to leave their batterers.

Recommendation:

Victims of domestic violence should be exempted from lifetime limits on benefits.

Problem:

Many women may want or need job assistance to establish and maintain independence from their batterers.

Recommendation:

Welfare-to-work programs should be equipped to handle the needs of domestic violence victims. Strategies for doing this include:

- *Allowing victims of domestic violence to self-identify during the process of designing the initial employment plans that are required of all participants.*
- *Ensuring that domestic violence services are available to women who need them, either on-site or at an accessible community setting, and that job training programs are both flexible and sensitive to the safety issues that women may have.*
- *Training all staff on the nature of domestic violence and the barriers that it may create for women so that they will be able to properly assist women who are victims of abuse. It should not be the responsibility of a woman seeking aid to advocate for the waivers or special services that she needs. Rather, all DSS workers should be trained to bring up the issue of domestic violence with clients through notifying them of domestic violence exemptions. DSS workers should encourage women to disclose situations of abuse in a sensitive and supportive manner.*

III. Domestic Violence and Welfare Reform: Child Support Orders

Problem:

Under Welfare Reform, in order to receive CalWORKs money, individuals must comply with the child support enforcement agency to establish paternity of their child and establish and enforce a child support order. Individuals may be exempted from this requirement only if they are deemed to have "good cause." These requirements can pose a serious threat to women who are/have been in an abusive relationship. For many women, cooperating with child support enforcement may result in retaliation from a batterer or may reveal to the batterer her location and the location of her children.

Recommendation:

The good cause exemption should include cases where a woman has been abused. While this currently is the case, very few women choose to use the good cause exemption,[4] most likely because they have not been informed that it is an option and so instead choose to pretend that they do not have information about the fathers of their children. In order for the good cause exemption to protect abused women, all women must be clearly informed that it is an option.

Problem:

While many women risk violence by pursuing child support, they may not be able to afford not to collect child support, particularly as it becomes more and more difficult to get welfare benefits.

Recommendation:

Women need to be given the option of pursuing child support in a way that maximizes their own personal safety. Suggested strategies[5] include:

- *In cases where domestic violence is a concern, the location of the woman and her children should not be disclosed unless ordered by the court. The woman should have the option of having mail delivered to a government office or some other anonymous and secure location so that the batterer will not know where she lives.*
- *If a woman wishes to pursue child support, she should be informed whenever an action is taken on her case so that she will be aware that the batterer may be angry. This way, she can take any special precautions needed.*
- *The woman should not be required to appear in court unless absolutely necessary. If she*

[4] Roberts, Paula, *Pursuing Child Support: More Violence*, Center for Law and Social Policy, Washington, 1997.

[5] Summarized from Roberts 1997.

Recommendation:

The law allows for exceptions to these requirements when "substantial evidence exists of an act or failure to act that presents an imminent or serious harm if the individual and her child lived in the same residence with the individual's own parent or legal guardian." This criteria should be used to waive the eligibility requirements for CalLearn assistance when relationship violence is a factor. The Family Violence Option may also be used to waive this requirement. Additionally, for the purposes of implementing the law, battered women's shelters should be considered an appropriate adult-supervised setting, and there should be enough flexibility within the regulations to allow a teen mother to move as quickly and as frequently as she needs in order to escape abuse.

Identifying Domestic Violence

Problem:

Like adult women, teens may be reluctant to disclose abuse. A teen may fear that disclosure will result in retaliation from her partner or that her children will be taken away from her. Previous insensitive responses from adults may lead a teen to feel that she will not be taken seriously when she discusses the abuse occurring within her relationship, or she may feel that the abuse is her own fault and that she deserves to be treated violently. A teen may not want to incriminate her partner, or she may believe that she can change him. Cultural and religious beliefs may also keep a teen from discussing abuse.

Recommendation:

To establish whether or not relationship violence is a concern in a teen applicant's life, DSS workers should encourage teens who are or have been in abusive relationships to self-identify. As a standard procedure, all teens should be informed of the possibilities for exemptions and domestic violence services.

Work Requirements and Lifetime Limits on Assistance

Problem:

According to the law, time spent on CalLearn assistance by minor parents who are not considered heads of household should not be applied towards lifetime limits on assistance. However, if a teen mother is exempted from the adult-supervised living requirement due to a domestic violence situation, she may be considered a head of household and be subject to time limits.

Recommendation:

Teen mothers who are unable to live in an adult-supervised household due to abuse should not be considered heads of households, and the time that they spend on CalLearn assistance while they are minors should not be counted toward lifetime limits. Additionally, the same exemptions that are provided to adult victims of domestic violence should also be made available to teens. (See pp.4-5 of this document.)

Child Support Enforcement and Statutory Rape

Problem:

Many of the concerns surrounding child support enforcement for adults also apply to teens. An

additional issue which may be of particular concern to teen mothers is that if the father of their child is 18 or older, the information that they disclose may be used to prosecute their partners for statutory rape. Within the context of the state of California's recent programs to crack down on statutory rape and the provisions within the welfare law which also call for an increased prosecution of statutory rape, it is possible that information revealed to social service agencies about the partners of teen mothers could be obtained by local District Attorney "Statutory Rape Vertical Prosecution Units" and used to press charges of unlawful sexual intercourse. Adopting a criminal justice approach to statutory rape which is not sensitive to the social context in which these relationships occur can be harmful to teen parents in several ways. Indiscriminately prosecuting fathers may prevent these men from providing teen mothers with the financial assistance and/or partnership that they need. Criminal prosecution may also deter teen parents from seeking assistance and may add to the distrust of the criminal justice system which exists in many low-income communities and communities of color, especially if these cases are drawn primarily from welfare recipients.

Recommendation:

Information collected for child support or other services should not be used to prosecute statutory rape without the teen mother's consent. The same exemptions to the child support enforcement provisions which are available to adult women who have experienced domestic violence should also be made available to teen mothers. *(See pp. 6-7 of this document.)*

V. Domestic Violence and Welfare Reform: Issues of Concern to Immigrants

Problem:

As a result of welfare reform, legal immigrants will no longer be eligible for some welfare benefits. This will have a serious impact on immigrant women who are in situations of domestic violence. Many of these women are financially dependent upon their batterer. Without the assistance that welfare provides, they may be unable to leave an abusive relationship. Immigrant women already face many obstacles which compound situations of domestic violence. These include discrimination, language barriers, and the insensitivity of many services to cultural differences. The new welfare measures simply add another obstacle, making it even more difficult for immigrant women to escape domestic violence.

Recommendations:

DSS workers need to inform all immigrant women who are in situations of domestic violence of the possibilities for exemptions to these measures and the procedures for applying for these exemptions. There are currently several situations in which immigrant women may be eligible for assistance:

- *There are three exemptions within the welfare reform law through which immigrants may be eligible for aid. Immigrants can receive a work exemption if they have worked in the U. S. for a total of 40 quarters. Quarters of work done by a spouse may be counted if the individual has not filed for a divorce. A military exemption is available to an immigrant who is or whose spouse is a veteran or on active duty. Immigrants who have refugee/asylee status are also eligible for a temporary exemption. DSS workers should assist immigrant women in documenting work quarters or military service done by their spouses and be sensitive to the fact that if a woman has recently left her batterer she may not have all of the documentation necessary in her possession. In these instances, requirements for documentation should be flexible, and if necessary a woman's own testimony should be counted as proof of quarters worked by herself or her spouse.*

- *The Violence Against Women Act allows battered women who are married to a U. S. citizen or legal resident to apply for residency without the cooperation of her husband. A provision within the new immigration law allows women who have applied for permanent residency under the Violence Against Women Act, who no longer live with their batterers, and who can demonstrate a "substantial connection" between the need for benefits and domestic violence to be eligible for welfare assistance. DSS workers should be sensitive to the fact that it may be difficult for a woman to leave her batterer before receiving any financial assistance. Therefore, implementation of these requirements should allow women some flexibility in meeting these requirements.*

- *Family Violence Option waivers may also be used to help immigrant women receive welfare aid.*

Because a woman who has left her batterer may not possess the documents need to prove her immigration status, all women should be given benefits during the time it takes to establish proof of their eligibility. In cases where battered immigrant women are unable to receive exemptions, DSS workers should be able to make appropriate referrals to domestic violence services along with services which will help them apply for residency under the Violence Against Women Act, and apply for citizenship. Services should be available to women in their first languages, and DSS protocols and staff trainings should address issues around respect for cultural differences.

Problem:

Under welfare reform laws, when an immigrant applies for assistance, her sponsor's income and resources shall be deemed available to the immigrant for her first three years in the United States. For many immigrant women who are victims of domestic violence, their sponsor may also be their batterer. When this is the situation, a woman may find herself economically trapped in an abusive relationship because she is ineligible for welfare assistance.

Recommendation:

The Family Violence Option should be used to waive the deeming requirements in situations where a woman's sponsor is also her batterer.

Problem:

Welfare reform makes all undocumented immigrants ineligible for any form of aid. DSS workers are required to report all undocumented immigrants to the INS. Undocumented women who are victims of domestic violence will be adversely affected by these measures and will be unable to receive any kind of support or assistance if they choose to leave their batterers.

Recommendations:

All women should be informed that if they are undocumented, they may be reported to the INS. They should also be informed of the services that are available to them. The U. S. Attorney General has designated certain services for which all women, regardless of their immigration status, are eligible. These include domestic violence agencies, public health services, soup kitchens, crisis counseling, and short term shelter. DSS workers should be able to refer undocumented immigrants to appropriate services.

Attachment
L

A federation of religious communities, churches and non-profit organizations have met on the following points regarding welfare reform. Represented are:

- The Contra Costa Interfaith Sponsoring Committee (CCISCO) representing 30 churches (25,000 parishioners)
- The Contra Costa Interfaith Alliance representing 30 churches and ten non-profit organizations
- Greater Richmond Interfaith Program representing 27 churches

1. Regarding "workfare"
    - insure equal pay for equal work
    - insure no displacement of current workers
    - insure no reprisals for unionization of workers
    - include college, adult schools, non-profit job training classes, and treatment centers for substance abuse
    - provide benefits to churches and non-profits who agree to be a "community service site"
    - provide clear instruction for matching the physical and mentally challenged with appropriate jobs

2. Ease "time constraints" as far as the Federal law allows using waivers wherever possible

3. Develop a plan within the county plan for private sector and non-profit job creation

4. Develop a funding program for job training in the private and non-profit sectors

5. Include special programs to meet the needs of those who are illiterate and/or non-English speaking

6. Include plans for quality childcare and low cost and safe transportation

7. Monitor the utility companies to enforce the laws obliging them to work out minimum or non-payment plans for low-income users.

8. Include pre-natal care for non-qualified immigrant mothers

9. Develop a plan to accurately track the positive and negative success rate of those who are removed from public benefits

10. Meet with other East Bay counties, especially Alameda, to work toward a consistent plan

11. Increase services to low-income families who have members involved in the justice system

12. Include a comprehensive plan to improve food security

13. Take active steps to enforce and increase low income housing

14. Fund more 24 hour hot lines for those whose benefits are cut and train the operators

15. Meet with us for further discussion on these issues before the plan is finalized

To: Christina Linville

Nov. 24, 1997

From: Carolyn Krantz

RE: Meeting tomorrow morning

In the meeting with the churches today a few suggestions were made about the agenda for tomorrow. Below are the suggestions with appropriate time restraints so we can get through all the points. The group wanted to set it up in dialogue fashion so that we could get through it. Most of us have not found copies of the document available in libraries, so we may need another meeting to be more thorough in the Plan's development.

Interfaith Coalitions and County Meeting Agenda-Nov. 25, 1997

Introductions and credential-Carolyn Krantz:- 5 min.

Specific Concerns: ten minutes each

1. **Job Development**- Sue Renfro
   "identify partnerships in the private sector"
   "identify local labor market needs"
   identify jobs which pay a living wage
   County Response

2. **Job Training**- Sr. Stella Goodpasture
   "collaboration with public/private agencies"
   "pre-employment community service plan"
   County Response

3. **Quality Childcare**- Marty McCarthy
   County Response

4. **Safe and Affordable Transportation**-Ethel Dotson
   County Response

5. **Affordable and Transitional Housing**-Sharon Bernhus
   County Response

6. **Rent and Utility Vouchers**- Ethel Dotson
   County Response

7. **Food Security**-Sr. Stella Goodpasture
   County Response

8. **Access to Health Services**-Sr. Stella Goodpasture
   County Response

9. **Eligibility, exemptions and tracking**- Carolyn Krantz
   County Response

Should we meet again? Discussion of future interaction between County Social Services and the Interfaith Coalitions- 5 min.

December 1, 1997

JOINT RESPONSE OF CONTRA COSTA LEGAL SERVICES FOUNDATION AND THE EMPLOYMENT LAW CENTER TO THE CONTRA COSTA COUNTY DEPARTMENT OF SOCIAL SERVICES DRAFT COUNTY CalWORKs PLAN

NOTE: For ease of incorporating these comments, our responses follow the order of the county plan. Following those responses are additional comments; these comments are no less important, and are listed in a separate grouping solely because they do not directly apply to specific sections listed, or are concerns that apply to the plan as a whole.

PLAN RESPONSES

1. CalWORKS Implementation Objectives (p. 3)

   Add as an objective that the county will actively work toward assuring that all CalWORKS components provide equal and meaningful access to all participants, by requiring extensive training of all county employees and subcontractors and rigorously enforcing anti-discrimination and ADA provisions and other employment rights. (See the Employment Law Center's mailing entitled "Assuring Compliance with CalWORKS Employment Related Provisions.")

2. Refugee Services (p. 8)

   The county plan should provide WTW components and/or ancillary services that include naturalization assistance for non-citizens as part of any refugee employment services program.

3. Service Delivery Model (p. 18)

   We have a concern about using the Medi-Cal program as the method by which the county will provide employment retention services. This will only be effective to the degree that the family continues to receive Medi-Cal. The potential exists that families may not receive Medi-Cal (for example if the family receives health care coverage through the employer or as child/spousal support), and therefore lose their ability to access the county's employment retention services.

   Recommendation: That the county specify a plan for providing employment retention services to families not on Medi-Cal, by designating an "Employment Retention Services" unit. The families thus can fully access

services without regard to receipt of Medi-Cal. Internally, the county can divide the staff into Medi-Cal and non-Medi-Cal staff.

4. One Stop Career Centers (p. 11)

The county "One Stop" Center locations list two centers for Concord and none for Martinez or Hercules.

Recommendation: The county needs to have a one-stop center in Martinez and Hercules. It should add these center if possible; if this necessitates a reduction in other locations, Concord should be reduced to one. Additionally, the county needs to assure that transportation to these centers exists (as with all CalWORKS components.) See Transportation comments.

All centers should be culturally and linguistically accessible to participants.

5. Welfare to Work Activities (p. 17)

The county should include in "other services:" 1) SIPs leading to employment; 2) time in which an adult participant is in counseling needed to enable the adult to participate in CalWORKs or employment; 3) the time a homeless adult recipient needs to obtain suitable housing (i.e. for homeless families and families living in substandard housing, when such housing affects the family's ability to successfully participate in WTW/employment activities).

6. The Model as a "working practice" (p. 18)

The county should include recipients and local welfare advocates on its Personnel and Operational task groups. This will meet, on a more manageable level, the county's obligation to receive public input into the development of its plan. Additionally, we recommend that the Staff Development Task Force include members who specialize in employment training/placement services and disability requirements (such as identifying and assisting recipients with physical and mental disabilities).

The Operational Task Group should continue to meet, after the development of the operational plan, to review the progress of the county's program, and to make recommendations for improving the program. The Task Force findings should be made available to the public.

7. Enrollment Phase-In (p. 18)

The county does not set forth the criteria/means by which it will phase in the enrollment of recipients into CalWORKs. As the 24-month "clock" for a recipient's welfare-to-work ("WTW") services begins to run from the signing of a WTW plan, after which the recipient will meet his/her hours by community service work, it is important to maximize the ability of recipients

to attend educational and training programs. The timing of enrollment thus is vital.

Recommendation: The county should set priorities for enrollment, starting with volunteers. The county should provide all WTW services to interested recipients, including everyone in a SIP, but not have those recipients sign the WTW plan until the end of 1998. Recipients who wish to maximize their education and/or training time should be enrolled last. The county should inform recipients of the advantages/disadvantages of enrolling early, and enroll recipients accordingly. All recipients currently in SIP programs should be enrolled in December, 1998, unless otherwise requested.

8. Orientation (p. 18)

The plan should include in its orientation, under "work activities" the education options.

9. Intensive Case Management (p. 19)

A. Child Welfare Services: The plan states that intensive case management shall include "open to child welfare services." It is not clear what this means.

Recommendation: The plan should clarify what intensive case management services covers. Regarding child welfare services ("CWS"), WTW child welfare case management services should assist families in receiving services that are part of the Juvenile Court reunification plan, and otherwise coordinating with the CWS worker. Unless case services manager must refer the family to CWS under current reporting laws, the manager should not involve CWS unless the family agrees to receive these services, and such services cannot be provided without the involvement of the CWS department. Both DSS and CWS shall be bound by confidentiality laws.

B. ABE and ESL: The plan states that participants shall be assigned to ABE and ESL, "where education is needed to become employed." Under W & I §11325.22(b)(3), a participant "who lacks basic literacy or mathematics skills, a high school diploma or general educational development certificate, or English language education ..., shall be assigned to participate in adult basic education as appropriate and necessary for removal of the individual's barriers to employment."

Recommendation: The county must enroll participants in ABE or ESL components, not just when it is likely to lead to employment, but more specifically, whenever it is "appropriate and necessary" to remove

barriers to employment. The county should specify how it will identify participants needing ABE/ESL.

The plan also states that ABE/ESL services will be concurrent with other work activities. This is more restrictive than what is required by law, and may be inappropriate depending on the individual's circumstances. Participants have the right to have a WTW plan that is tailored to their individual needs, and which meets the requirements of CalWORKs. If ABE/ESL components are too time consuming and/or the individual will not benefit by the classes being combined with other WTW activities, the educational component cannot not be combined with the other activities, absent the participant's knowing and voluntary consent.

Recommendation: The plan must be changed to state that when appropriate, and agreed to by the participant, ABE/ESL components shall be concurrent with other work activities.

10. 6 Month Extension (p. 19)

The plan refers to the "18-24 month" time period for person entering CalWORKS after the new program is implemented. This reference does not meet the requirement that the plan set forth the criteria for the 6 month extension. This is required information for a county plan under CalWORKs. W & I 11454(d).

Recommendation: The county should list as the criteria for extending the WTW time that any participant who is in compliance with WTW activities who had not obtained employment sufficient to terminate aid shall be able to continue in WTW activities for 6 months.

11. Diversion (p. 20)

The county states that it is developing its criteria for diversion.

Recommendation: Diversion should be available to assist families who have any short-term need for funds to prevent them turning to welfare. This should include the need for rent, car repair, relocation funds to move to an out-of-county job, funds to end homelessness, etc., as well as funds to find employment (such purchase of tools for a trade, transportation to look for/attend work, etc.). The diversion criteria must be made available to all applicants for CalWORKs prior to making an application.

12. Immunizations (p. 20)

The county plan must provide for transportation for families needing this supportive service in order to obtain the required immunizations. The county

must set forth the criteria for exempting families from immunizations based on medical/religious grounds.

13. School Attendance (p. 20)

The county should establish a method of verifying school attendance directly from the school, with the parent's consent. Only if the school fails to provide the verification should family's be asked to obtain it. Under any verification plan, the county plan must set forth that the county will assist parents who are unable to obtain school verification (including, but not limited to families who cannot get the verification because of disabilities, transportation problems, time limitations related to the parent's WTW activity). The county should also specify in the plan that the good cause/conciliation provisions apply prior to sanctions.

14. Substance Abuse (p. 22)

The county has not yet developed the specifics of this program. The county must receive public input on this plan component when it begins to work on this section. In developing its plan, the county should consult with professionals who work in the field of substance abuse as well as recipients in recovery. The plan should state the specifics of to whom, when, where and how these services will be provided. Any plan should provide for linguistic and cultural appropriate services.

Appropriate Staffing

The county plan should specify the minimum educational/training background of workers who will diagnose whether a participant has a substance abuse problem.

Recommendation: Only Licensed Clinical Social Workers who have received specific training in working with persons with substance abuse problems should be allowed to diagnose substance abuse problems. Staff from the "Dual Diagnosis" program should not be authorized to make this diagnosis.

Confidentiality

The plan should specifically refer to, and require, that all county workers and subcontractors are in compliance with the California Confidential Medical Information Act (Civil Code §56).

Licensing

The county plan should provide that only licensed substance abuse treatment programs, and licensed counselors, be used.

Transportation

The county must assure that participants referred to assessment or treatment for substance abuse receive necessary transportation services.

15. Mental Health (p. 23)

The county has not yet developed the specifics of this program. The county must receive public input on this plan component when it begins to work on this section. In developing its plan, the county should consult with professionals who work in the field of substance abuse as well as recipients in recovery. The plan should state the specifics of to whom, when, where and how these services will be provided. Any plan should provide for linguistic and cultural appropriate services.

mental health?

The county plan should state that the county, its subcontractors and any other entity receiving TANF funds through the county program shall be in compliance with the Federal Mental Health Systems Act of 1980 (42 USC §9501).

Post-CalWORKs Services (p. 24)

The county does not set forth what mental health services will be provided after an adult participant exceeds the 60 month time limit.

Recommendation: The county should include mental health services as part of its services for adults "leaving" CalWORKs, including those who are losing aid as a result of the 60 month time limit.

Transportation

The county must assure that participants referred to assessment or treatment for mental health receive necessary transportation services.

16. Child Care (p 25)

Disabled Children

Generally, the plan does not make any reference to child care for disabled children; it should do so. In particular, the plan should reference the Americans with Disabilities Act (ADA) requirements (both that the agency and its subcontractors not discriminate against families with children with disabilities in WTW activities and that child care placements make reasonable accommodations in order to accept children with disabilities. The Child Care Law Center can provide the county with extensive information about the ADA and child care. The county also should specifically reference the pay differentials for children with special needs, as well as requiring that the child care coordinators/referral agency inform participants of this, so they can better access child care.

The county should inform parents with severely disabled children of the exemption for parents who need to take care of incapacitated household members that interferes with a recipient's ability to participate in WTW activities. For those parents who volunteer to participate in spite of eligibility for the exemption, the county should work closely with the parent(s) to obtain child care that provides for the child's special needs.

Evening and Weekend Care

The county plan also should reference the availability of a pay differential for weekend and evening child care, as well as requiring that the child care coordinators/referral agency inform participants of this, so they can better access child care.

Referral Access (p. 26)

The county must provide phone sites, with transportation, for families who need child care, but do not have phones.

Time Limits

When advising parents of their right to/qualification for an exemption based on new child or child care, the county plan should provide that the WTW worker shall discuss with the parents the relevant time-limits (18/24 month and 60 month), and the effect of the exemption on that time limit.

Funding

If insufficient TANF funds exist for child care for 11 and 12 year olds, or Stage 2 child care, the county should provide funds for this care.

Standards for Child Care

The county plan should adopt the standards of quality and available child care set forth in the Child Care Law Center document, attached.

Non- and Limited-English speaking and Immigrant children

The plan should indicate how it will work with parents to assure that child care is linguistically and culturally appropriate.

Component Changes/Work Interruption

The county should set forth criteria for providing child care when a WTW component or employment is/will be interrupted for short periods, to guarantee that the family does not lose their placement.

Stage 1: (p. 27)

The county needs to set forth the criteria for determining whether a family shall be in Stage 1 or Stage 2 child care, by defining what a "stable situation" is. Because of the funding concentration in Stage 1, and to maximize continuity of child care/minimize problems for recipients, we recommend that no participant in a training program be listed as having a "stable situation." Additionally, no employment should be considered stable unless/until the recipient has held the position for more than six months and, in addition, is not on probation. Also, the volume of recipients with problems receiving payments from the county for child care under the AFDC (GAIN/NET) program, leads us to recommend that the county should not administer the child care program at any stage.

Stage 1-2 (p. 27-28)

The county plan provides for a centralized wait list for subsidized care only for Stage 3 recipients. The county should provide, within the limits of the law, for a centralized wait list for CalWORKs participants regardless of which stage child care they are receiving. The wait times are very long, and having one list will increase the chance that when a participant reaches Stage 3 that a slot will be open. (If possible, participants who reach the top of the wait list prior to entering Stage 3 should defer the slot to a Stage 3 participant, but not lose their "ranking" on the list.)

Stage 2 (p. 26; 27-28)

The county plan states, on p. 26, that families will move to Stage 2 child care when "working full-time and no longer receiving case aid...." The CalWORKs is broader than this, as the standard is "ineligible for aid." See ACL 97-73. Given the 60 month limit, families may not be receiving aid, although eligible. Time in which these families receive child care assistance does not count towards the two-year limit on transitional child care.

Child Care for 11-12 year olds (p. 29)

We commend the county's inclusion of child care for children up to 12. The county should correct footnote 40, however, which states that CalWORKS allows child care only through age 10. CalWORKs specifically provides for child care for children aged 11 and 12: W & I §11323.2(a)(1)(b).

Additionally, CalWORKs mandates that counties coordinate with school districts on the availability of after school activities. (AB 1542 §12; Ed. Code §8481). The plan should set forth what efforts the county will make to locate, list and develop county after school programs. The county's operational plan should set forth that case managers should work with parents to arrange resources for children over 12. The county should grant good cause for non-

participation if the parent(s) cannot find suitable after-school adult supervision of children over 12 who are at risk if left without adult supervision.

Stage 3 (p. 29)

The county plan should list priorities for child care in Stage 3, in the event that there is insufficient funding. We recommend that families needing child care to assist them in complying with a reunification/CPS plan get first priority. The county plan should provide that subsidized child care slots for non-CalWORKs children shall not be eliminated in order to provide the slots for CalWORKs families.

17. Transportation (p 29)

The plan must provide transportation for all required CalWORKs components, as well as assuring that all participants can access all of the county's CalWORKs services, including, but not limited to: Substance Abuse, Mental Health, and Education components.

Recommendation: CalWORKs requires children to attend school and obtain immunizations. Older children not in school must participate in welfare-to-work ("WTW") activities. The plan therefore must provide for transportation for children, in the form of bus/BART pass for in-county transportation, and as otherwise necessary for out-of-county trips. Children are also required to be immunized. The county therefore must provide, for families needing such supportive services, transportation to obtain immunizations. The county must provide for transportation to One Stop Career Centers, and any other service which the county provides, including any WTW component. CalWORKs transportation must be accessible to persons with disabilities.

18. Community Service (p. 31)

In developing the Community Service ("CS") program, the county should get extensive public input, particularly from recipients and non-profits who will be the most impacted by this provision. The county must specify that Community Service ("CS") work hours shall be limited by the minimum wage divided into the family grant (with other participation hours being made up through WTW activities that will lead to employment). It also must specify that CW placements shall only be made when it has been determined that the placement will provide the participant with job skills leading to unsubsidized employment and will comply with anti-displacement provisions. See W & I §11324.6.

Contra Costa's operational plan should provide for prevailing wages for community service work. Otherwise, the influx of community service workers will depress wages, resulting in displacement of workers. Also, it is only fair that people doing equal work get equal pay. The prevailing wage, of course,

can take into account the community service worker's job skills and experience. Training wages, if customary, would also be appropriate. If the resultant hours of participation (based upon dividing the grant by the prevailing wage) is below the required number of hours, the county can have the participant make up the additional hours in activities that will increase the recipients skills and employment opportunities, such as education, and training, as long as the person is not performing employment services.

19. Domestic Violence (p. 32)

The county should follow the recommendations set forth in the California Alliance Against Domestic Violence mailing that went to all county welfare directors, as well as those from the County Health Department.

20. Transitioning off of aid (p. 38)

CalWORKs requires that the county set forth its plan for assisting families transitioning off of aid, specifically including families leaving CalWORKs as a result of time limits. The Contra Costa Plan, however, only refers to families transitioning off "due to employment."

Recommendation: All post-aid services must be equally available to adults losing TANF aid due to time-limits.

21. Job Creation (p. 40)

The county should include job creation through the HUD Section 3 program. (This program requires entities receiving HUD funding, including CDGB funding, to provide jobs for the development, operation and creation of federal housing. This includes maintenance and repair work, as well as construction jobs.)

Also, the agency and its CalWORKs service contractors are not mentioned in the job creation section.

Recommendation: The agency and its subcontractors should be listed in the state plan as committed to hiring workfare employees when openings occur. The agency should also eliminate subcontractors who demonstrate a history of not hiring workfare participants. (The plan should provide that all such subcontractors are bound by confidentiality laws.)

Overall, the county should state in its plan that job creation will not merely be job referrals or operating subsidies for current employers. (Providing funds to give employers tax breaks and operating subsidies does not create new jobs, but merely displaces current employees and drives wages down.) Job creation must create new jobs, which the employer otherwise would not have provided, with a commitment of the employer to hire recipients who successfully participate in their programs.

22. Hours of Participation (p. 42)

The county draft plan opts to accelerate participation hours to 26 hours at the outset.

Recommendation: Given the limited number of slots, the need to develop specifics of many areas of the county plan, the need for employee training, the need for transportation and child care, the county should not opt to exceed the minimum number of hours on an across-the-board basis. Individuals should be informed that they may exceed the minimum number of hours, and given an opportunity to volunteer for more hours, should they desire to do so for child care reasons or program component.

To meet the county's concern regarding a meaningful job services experience, the plan should state that the hours requirement will commence at 20 hours, unless the participant is in the jobs services phase, in which case the hours shall be 26.

ADDITIONAL RESPONSES

Grievance Procedures

The county is required to list the local-level grievance procedures, in addition to the state hearing rights, which will be available for certain WTW issues. W & I §11327.8. Contra Costa's plan fails to discuss its local grievance procedure, and needs to be corrected.

Employment Assessments

The county plan should provide for a full employment assessment for those locating jobs at the job search stage. This will assist participants with job skills in identifying areas for future job search/skill development, in order to assist them in becoming self-sufficient and to minimize the likelihood of a future need for aid.

Job Search

The county should provide an exemption from job search (which is permissible if agreed to by the participant), when the participant is in a SIP or vocational training.

Additionally, the county plan should state that job search should be meaningful, and the criteria, in addition to SIPs/vocational training, under which a participant will not receive benefits from performing a job search, and may proceed to assessment/another stage of WTW activity.

Civil Rights

The county plan should specify that it, all its contractors, and any other

entity receiving TANF funds through the county program are in compliance with civil rights provisions, including, but not limited to: the Civil Rights Act of 1964 (42 USC §2000E); the Architectural Barriers Act of 1968 (42 USC §4151); the Rehabilitation Act of 1973, as amended, (29 USC §701); the ADA (42 USC §12101); the Civil Rights Act of 1991 (42 USC §1981); the Federal Mental Health Systems Act of 1980 (42 USC §9501); Family and Medical Leave Act (29 USC §2601). The county additionally should require that these same CalWORKs providers shall be providing Workers' Compensation, and when applicable, Unemployment/SDI, FICA and other deductions.

The county plan should state, and the county establish, a civil rights compliance oversight committee. This committee should include participants, members of the relevant communities, and professionals.

The County plan should list agencies with expertise in these programs as partners in developing the plan. Examples are: the Pacific Disability and Business Technical Assistance Center; the Bazelon Center for Mental Health Law; and the Employment Law Center.

Homeless recipients

The county should have a specific plan for assisting homeless recipients. In doing so, the county should refer to the 1997 Contra Costa Continuum of Care Homeless Plan.

Certifying recipients: The county should arrange with EDD to be a certifying agency for the welfare tax credit for employers.

Job placements: The county, in its operational plan, should specify standards for job placements. This would include the requirements of all applicable laws, such as Health and Safety, Workers' Compensation, and anti-discrimination laws. The plan should also require that subcontractors have all staff trained in employment laws that would govern their program services to recipients, as well as recipients' workers rights (such as reasonable accommodations for physical and mental disabilities). Standards for job placements would also include prevailing wage and equal pay for equal work; the right of recipients to organize; that the placements will provide actual job skills; and the opportunity for training and advancement.

Education: The county should maximize recipients' ability to obtain education. To do so, Contra Costa should take as expansive a position as possible on WTW activities. Finishing a BA program should be presumed to lead to employment. Study time and transportation to/from school and child care should be included in WTW activities.

Recipient Information: The county operational plan should require the agency and its subcontractors to make information available to recipients on 1) available benefits; 2) exemptions; 3) strategies to maximize educational opportunities; 4) list of employment and other legal rights; 5) advocacy referral lists. The county should also list the PIC and JTPA service areas and available services.

Displacement Grievance Procedure: the county is required to have such a procedure. It should be set out in the operational plan.

Service Integration Sites

These sites should not include Probation as an identifiable agency permanently located at the site. The sites should be accessible for probation appointments arranged in advance by a participant on probation, and have a means of reporting required information. A permanently staffed, identifiable probation area could act as a deterrent to adults on probation who are complying with their WTW plan who are on probation.

Educational Programs

The county will need to provide a list of programs in the community colleges which "lead to employment" (W & I §11325.23.)

Appraisals/Assessments

The county plan should specify that appraisals and assessments will be linguistically and culturally appropriate.

Training

The county plan should state what trainings will occur, and at what frequency these trainings should take place. Training will be needed to assure that the county, its subcontractors, and entities receiving TANF funds through the county program are in compliance with anti-discrimination and employment laws.

Overall Obligations

The county plan should set out its overarching obligations, such as applicant/recipient confidentiality; language access; due process (notice and rights to grievance and state hearings), and that these rights apply to all CalWORKs services (such as PIC/JTPA).

Referrals

The county plan should state that it will develop, and make readily accessible to participants (to everyone at Orientation and on an on-going at

WTW sites), a list of referrals. This list should include CBO service providers, legal advocates, disability and employment rights advocates, and others deemed appropriate by the county.

Citizenship Programs

The county plan should provide WTW components and/or ancillary services that include naturalization assistance for non-citizens. This should be part of any refugee employment services program, but also include services to families which have one or more family member who is not a citizen.

Home Visits

The county plan should provide for home visits (only upon consent of participants), for the purposes of determining non-compliance with a WTW plan or other sanctionable CalWORKs requirement prior to imposing sanctions.

CHILD CARE LAW CENTER

22 SECOND STREET 5TH FLOOR ■ SAN FRANCISCO ■ CALIFORNIA 94105
TELEPHONE 415.495.5498 ■ FAX NUMBER 415.495.6734 ■ E-MAIL INFO@CHILDCARELAW.COM

The "Unavailability of Child Care" Work Exemption Language County Level Factors for Consideration

Under Federal and California state law, welfare recipients must be excused from mandatory participating in welfare to work activities when appropriate child care is "unavailable." When child care is "unavailable" for a child under six years old, Federal law prohibits states from terminating or reducing TANF assistance for single custodial parents.[1] California's new welfare law implementing its TANF block grant (AB 1542 or "CalWORKS") allows a "good cause" exemption from participation in welfare to work activities, if child care is not "reasonably available" for a child under 10 years old.[2]

During state welfare negotiations, CCLC submitted the following language to Senate staff, in order to provide the state with guidance in defining the "unavailability" of child care for purposes of the work exemption. This language was not incorporated into state law; instead, this task has been delegated to county welfare departments to create their own criteria. We are providing you with this language to provide you with some guidance in assisting your county welfare department in defining this criteria at the local level. The following language complies with the statutory exemption as required by Federal law.

"Unavailability of appropriate child care within a reasonable distance from the individual's home or work site."

1. Whether or not child care is a "reasonable distance" from a client's home or worksite shall include, but is not limited to, a consideration of the following factors: (a) whether or not a client has an independent means of transportation, and if not, (i) the availability of public transportation, (ii) the cost of public transportation, (iii) the hours of public transportation operation in relationship to a client's work, education, or training schedule, and (iv) a weighing of the "reasonableness" of the time involved in transporting oneself from home to child care to worksite, versus the actual hours of work.

(b) If the client has an independent means of transportation, such as a car, or other assistance, whether or not child care is a "reasonable distance" from a client's home or

[1] Personal Responsibility and Work Opportunity Reconciliation Act of 1996, P.L. 104-193, § 407(e)(2). The TANF (Temporary Assistance for Needy Families) block grant replaced the prior AFDC (Aid to Families with Dependent Children) program. All bolded and italicized text that follows is language excerpted from P.L. 104-193, § 407(e)(2).

[2] As amended by AB 1542, Welfare and Institutions Code § 11320.3(f)(3).

worksite shall include, but is not limited to, a consideration of the following factors: (i) the reliability of the vehicle or other transportation, (ii) transportation costs, including costs involved in maintaining and ensuring the reliability of the transportation, (iii) the commuting time from the client's home to the child care facility to the work site.

2. Definitions: "Appropriate child care" under this subdivision shall include, but is not limited to, a consideration of the following factors: (a) reliability and consistency of child care arrangements, [see subsection here regarding inclusion of legislative intent language, below], (b) availability during the client's hours of work, education, or training, (c) the availability of licensed child care if the client wishes, (d) the availability of child care which addresses any special needs of the child (e) care that meets minimum health and safety guidelines, (f) cultural and/or linguistic appropriateness, and (g) developmental and age appropriateness of the available care.

3. Legislative Intent language to include somewhere, something to the effect that: Given substantiated research which demonstrates the link between (1) the reliability and stability of child care arrangements, and (2) the ability of a family to move towards and maintain long-term employment and self-sufficiency, child care shall be considered "inappropriate" and "unsuitable," if the child care arrangement results in an unreasonable number of interruptions and breakdowns, so as to interfere, or is likely to interfere with a client's attendance at work, education, or training.

4. Definitions: "Available child care": At a minimum, a client shall have two child care options, one of which shall be an option to obtain licensed child care. Clients shall have the option to choose the type of child care setting, including family day care, in home, or center-based care. These provisions can be supported pursuant to federal law that recipients of CCDBG shall have "equal access" to child care, as to those families who are not receiving subsidized child care.

"Unavailability or unsuitability of informal child care by a relative or under other arrangements."

5. Definitions: "Unsuitability" of informal arrangements and child care by relatives. Child care shall be considered "unsuitable," if: (a) the child care arrangement is so unstable and unreliable, as is to likely result in a series of interruptions, or breakdown in the arrangement, (b) the provider fails to meet minimum health and safety standards, (c) the child care arrangement does not address the special needs of a child with disabilities.

"Unavailability of appropriate and affordable formal child care arrangements."

6. Definitions: "Affordable child care": At a minimum, child care costs which result in a family co-pay exceeding 10% of a family's income, shall not be considered "affordable." "Affordability" of child care, shall also include a consideration of transportation and other associated costs.

c:\jcg\unavail.fin
November 1997

TO Christina Linville
Welfare Reform Planning
Social Service Department—510-313-1758

FROM Gwen Watson
League of Women Voters

DATE November 30, 1997

SUBJECT Critique of CalWORKs County Plan Draft

My compliments to you, John, and your staff for completing the rough draft of Contra Costa's CalWORKs. It is written in a style that is easy for the lay person to understand.

Some of the great innovations are: One-Stop Career Centers; Continuing to Assist Families Transitioning off aid; exploring ways to make transportation more available, affordable, and accessible to CalWORKs participants; and the intent to provide child care for 11-12-year-olds—even though the State only allows for child care through age 10.

My concerns fall into three broad areas that seem to need more attention:

Jobs With Inadequate Wages
The Reform emphasizes employment. What I'd like to see added to the employment/job statements in CalWORKs documents is **jobs with wages that can support a family or wages that permit a worker to be self-sufficient.** To simply state that WTW moves former AFDC recipients into jobs ignores the important fact that most entry-level jobs cannot support a family or permit a worker to be self sufficient. Low-wage jobs doom working people to a life of poverty and dooms CalWORKs to failure.

Objective iii for 1998 CalWORKs Implementation states, "Achieve at least 2,500 employment placements, with at least 30% of those resulting in exits due to employment." I'd recommend that this phrase be added after the words employment placements: "**of full-time employment with wages adequate for sustaining a family.**"

Objective xi states, "Participate in activities that create jobs (add here: **full-time jobs that provide adequate wages**) and promote economic development in the county.

Health Care For the Working Poor

Those workers who do not qualify for MediCal and whose employer does not offer healthcare as a benefit are normally refused entry into an HMO if there are pre-existing conditions. The Kennedy-Cassebaum (sp?) Bill deals with this issue only when moving from a job that offered healthcare to a new job. But for those workers who are entering the work force and work for firms that do not offer medical insurance, and have pre-existing medical conditions, they will lose out on this coverage. (On page 39 of the Plan it states "referrals to public health and mental health services;" it isn't clear whether or not pre-existing conditions apply here).

Objective iv's second statement is "Specifically, work to increase access to, capacity and quality of child care and transportation services." (What about healthcare?)

Affordable Housing

I did not find that this issue is handled in the CalWORKs draft. Yet it is so essential to the stability of a family.

SHELTER INC.
OF CONTRA COSTA COUNTY
1070 Concord Ave., Ste. 200
Concord, CA 94520
(510) 827-3598 Central
(510) 778-0298 East
(510) 215-0636 West
(510) 803-0188 South
(510) 827-2028 Fax

December 1, 1997

Ms. Christina Linville,
Welfare Reform Planning
Contra Costa County Social Service Department

Re: CalWORKs County Plan

Dear Christina,

Enclosed are comments on the first draft of our county's CalWORKs draft.

As Contra Costa County prepares to implement the changes as outlined, it is important the county also prepare to monitor the impact on homelessness in our communities, and on the individual homeless people.

Under Section VI, Child Care and Transportation Services, increased transportation services are outlined, but does not address that no sanctions apply which require travel to and from place of employment or activity more than two hours round trip (AB 1542, Sanction/conciliation process:) Will child care be in the area local to the WTW participant or will child care be outside the area and how does the individual allocate this with travel time to and from work?

Under Section VIII, Community Service Plan, it states that need for CS will increase over time; unmet need could be met through CS activities. What will happen to individuals who fall into this category at the beginning of 1998 while the county collaborative is discussing these issues and how to address them?

It appears that there is mention of data collection efforts to be undertaken which address the impact of CalWORKs on homelessness under Section X (Performance Outcomes to meet Locally Established Objectives). Under CalWORKs, Contra Costa County will be required to track the areas outlined below.

FUNDED IN PART BY A CONTRA COSTA COUNTY DEVELOPMENT BLOCK GRANT

*Welfare to Work success - including rate of movement into employment, earnings of CalWORKs participants and those who have left the program, and job retention rates

*Child support payment and collection rates

*Child well-being - including foster care entries, at-risk births, school achievement, child poverty, and child abuse reports

*Demand for GA

*Support service supply, demand, and utilization by CalWORKs recipients

*Number of identified families affected by domestic violence

*Locally-identified outcomes - in addition to the above, which may reflect goals for CalWORKs implementation or possible negative outcomes the community wishes to monitor. These outcomes shall be identified within our county plan, along with the data the county intends to collect to monitor these outcomes and the method of data collection.

Not being familiar with the Social Service IM/GAIN Redesign, I am not sure the above required items are/will be covered as it is not that clear.

The draft provided by you is large, complex, and I am sure can be overwhelming, even to those of you who are involved in the re-structuring process considering the time frame involved. I wish I had the luxury of more time to review this draft and give it the attention is justly deserves. But given the deadline for comment/suggestions, it just isn't there.

Sincerely,

Rob Draim

Rob Draim
Community Outreach Coordinator
Secretary/Treasurer
Association of Homeless and Housing
Service Providers

Family and Human Services Committee
Public Comment on the County Plan
December 8, 1997

- Job development and creation
- Funding for provision of necessary activity
- Collaboration with private sector
- Child care capacity and funds
- Transportation services
- Jobs-Housing proximity
- Multi-year implementation and impacts to the community
- Collaboration with labor organizations and their apprenticeship programs
- Use lessons learned from SSD Demonstration Projects, SIT, PIC One-Stops, etc.
- Share the experiences of CalWORKs graduates to help future participants
- Utilize One-Stop resources to benefit entire community
- Expand positive collaborative processes
- Develop means to coordinate the full range of CalWORKs activities

Attachment M

County Plan Budget
1997/98 State Fiscal Year

Section 1

	Total	FCS	State General Fund	County Funds *	Other **
Food Stamp Administration (For County MOE Purposes)	5,985,477	2,992,738	2,094,917	897,822	

* When combined with food stamp administration, the total level of estimated county funds for CalWORKs administration and services should meet the requirement of Section 15204.4 of the W&I Code which specifies that counties expend an amount for these programs that, when combined with the amount expended for the administration of the food stamp program, equals or exceeds the amount expended for corresponding activities in 1996/97.

** If other sources of funding are being made available for an activity, please identify on a separate page.

County Plan Budget
1997/98 State Fiscal Year

Section 2

Note: The following categories are for information purposes only and are not an indicator of specific claiming categories

	Total	TANF/State General Fund	CCDBG	Title XIX	County Funds *	Other **
TOTAL CalWORKs Admin & Services Items (A) thru (D)	31,973,789	24,834,233	0	179,898	3,241,816	
(A) TOTAL CalWORKs Single Allocation Items (1) thru (7)	27,590,324	24,348,508	0	0	3,241,816	
(1) Benefit Administration	15,626,624	12,384,808			3,241,816	
(2) Program Integrity (Fraud)	1,513,091	1,513,091				
(3) Staff Development/Retraining	593,706	593,706				
(4) Welfare-to-Work Activities	7,652,221	7,652,221				
(5) Cal Learn	837,386	837,386				
(6) Child Care - 1st half of 1997/98	1,367,296	1,367,296				
(7) Other Activities ***						
(B) Child Care - 2nd half of 1997/98	3,717,842					
(C) Mental Health Treatment	359,796	179,898		179,898		
(D) Substance Abuse Treatment	305,827	305,827				

* When combined with food stamp administration, the total level of estimated county funds for CalWORKs administration and services should meet the requirement of Section 15204.4 of the W&I Code which specifies that counties expend an amount for these programs that, when combined with the amount expended for the administration of the food stamp program, equals or exceeds the amount expended for corresponding activities in 1996/97.

** If other sources of funding are being made available for an activity, please identify on a separate page.

*** Please identify "other activities" on a separate page.

OTHER CONTRA COSTA AGENCIES FUNDED TO SERVE CalWORKs PARTICIPANTS

Agency	Amount	Funding Timeframe
Community Colleges	$1, 588,484	1997-8 State Fiscal Year
Adult Education and Regional Occupational Centers/Programs	$ 762,260	1997-8 State Fiscal Year
Federal Welfare-to-Work Funds[1]: √ Contra Costa Service Delivery Area √ City of Richmond Service Delivery Area	 $1,137,934[2] 798,821	1998-9 Federal Fiscal Year

[1]Federal Balanced Budget Act of 1997

[2]Does not include state matching funds; amounts could be somewhat different ($1,315,243 for Contra Costa SDA, 716,347 for Richmond SDA) if an alternate criteria is used.

California Department of Education
Specialized Programs Branch

Regional Occupational Centers and Programs & Adult Education Funding

Funding Formula Requirements

Sources: The 1997-98 State Budget Act, AB 1578 and AB 1542

1. Funding is Average Daily Attendance (ADA) based and shall be distributed at each agency's base revenue limit.

2. Funding distribution must be related to the Instruction and Job Training Plan (IJTP) to be developed in each county. Participants include County Superintendent of Schools, school districts with Adult Education programs, Community Colleges, and other job training providers including Regional Occupational Centers and Programs (ROCP). County plans shall be approved by the County Welfare Director.

3. Funding is derived from two sources:

   (a) $25 million (from Proposition 98 [1995-96 settlement])
   The $25 million is one-time money that will be expended over the 1997-98 Fiscal Year. The Legislative Analyst's Office indicates that although this is one-time funding for 1997-98, it is the intent of the Legislature that this funding will be built into future State Budgets.)

   (b) $17 million Temporary Aide to Needy Families (TANF) funds (formerly Greater Avenues to Independence (GAIN) ADA.
   The $17 million is an annual allocation composed of $8.5 million in federal TANF funding and $8.5 million in state match.

4. Funding must support education and training services which assist eligible CalWORKs family members become employed, reach self-sufficiency, and reduce dependency on public assistance.

5. Funding may be spent on ROCP or Adult Education programs and services.

6. The $25 million is restricted to providing programs and services which are "not generally available to persons which are not members of an eligible family."

7. The Superintendent of Public Instruction will develop the method for determining the maintenance of effort relative to the number of individuals served during 1997-98 Fiscal Year in Adult Education programs.

8. Funding is made available to ROCP and Adult Education providers when the existing ADA CAP is reached, and all JTPA 8%-50% funding is encumbered within the respective county.

Calworks Funding Formula by County Allocations

COUNTY NAME	CO. CODE	Co.% of St Adt Pop	Total AFDC Nov-96	Co. Percent of State AFDC	Co. Funding of State AFDC	Adj Co. Fund of State AFDC		NOTE
ALAMEDA	1	4.30%	31,026	4.00%	$ 1,700,592	$ 1,686,146	$ 650,000	13 agencies below $50,000
ALPINE	2	0.00%	33	0.00%	$ 1,809	$ 50,000	$ 289,187	Original Allocation of the 13
AMADOR	3	0.10%	361	0.05%	$ 19,787	$ 50,000	$ 360,813	Amount to be adjusted
BUTTE	4	0.61%	7,317	0.94%	$ 401,058	$ 397,651		
CALAVERAS	5	0.11%	825	0.11%	$ 45,220	$ 50,000	0.68%	% of State AFDC of the 13
COLUSA	6	0.05%	318	0.04%	$ 17,430	$ 50,000	$ 42,114,187	Adjusted amount to be prorated
CONTRA COSTA	7	2.70%	14,026	1.81%	$ 768,791	$ 762,260		
DEL NORTE	8	0.08%	1,185	0.15%	$ 64,952	$ 64,400		
EL DORADO	9	0.42%	1,994	0.26%	$ 109,295	$ 108,366		
FRESNO	10	2.24%	30,804	3.98%	$ 1,688,424	$ 1,674,081		
GLENN	11	0.08%	712	0.09%	$ 39,026	$ 50,000		
HUMBOLDT	12	0.40%	3,770	0.49%	$ 206,641	$ 204,885		
IMPERIAL	13	0.37%	7,290	0.94%	$ 399,578	$ 396,184		
INYO	14	0.06%	420	0.05%	$ 23,021	$ 50,000		
KERN	15	1.83%	21,461	2.77%	$ 1,176,317	$ 1,166,324		
KINGS	16	0.34%	3,452	0.45%	$ 189,210	$ 187,603		
LAKE	17	0.17%	2,369	0.31%	$ 129,849	$ 128,746		
LASSEN	18	0.09%	872	0.11%	$ 47,796	$ 50,000		
LOS ANGELES	19	29.78%	250,026	32.26%	$ 13,704,382	$ 13,587,967		
MADERA	20	0.30%	3,378	0.44%	$ 185,154	$ 183,582		
MARIN	21	0.77%	1,310	0.17%	$ 71,803	$ 71,194		
MARIPOSA	22	0.05%	392	0.05%	$ 21,486	$ 50,000		
MENDOCINO	23	0.27%	2,597	0.34%	$ 142,346	$ 141,137		
MERCED	24	0.60%	10,298	1.33%	$ 564,452	$ 559,657		
MODOC	25	0.03%	397	0.05%	$ 21,760	$ 50,000		
MONO	26	0.03%	88	0.01%	$ 4,823	$ 50,000		
MONTEREY	27	1.20%	6,467	0.83%	$ 354,468	$ 351,457		
NAPA	28	0.37%	1,202	0.16%	$ 65,884	$ 65,324		
NEVADA	29	0.26%	953	0.12%	$ 52,236	$ 51,792		
ORANGE	30	8.10%	34,568	4.46%	$ 1,894,735	$ 1,878,640		
PLACER	31	0.58%	2,612	0.34%	$ 143,168	$ 141,952		
PLUMAS	32	0.07%	408	0.05%	$ 22,363	$ 50,000		
RIVERSIDE	33	3.93%	31,370	4.05%	$ 1,719,447	$ 1,704,841		
SACRAMENTO	34	3.50%	46,592	6.01%	$ 2,553,793	$ 2,532,099		
SAN BENITO	35	0.12%	953	0.12%	$ 52,236	$ 51,792		
SAN BERNARDINO	36	4.77%	55,397	7.15%	$ 3,036,411	$ 3,010,617		
SAN DIEGO	37	8.39%	56,266	7.26%	$ 3,084,042	$ 3,057,844		
SAN FRANCISCO	38	2.43%	10,869	1.40%	$ 595,750	$ 590,689		
SAN JOAQUIN	39	1.62%	19,358	2.50%	$ 1,061,047	$ 1,052,034		
SAN LUIS OBISPO	40	0.73%	3,212	0.41%	$ 176,056	$ 174,560		
SAN MATEO	41	2.18%	3,834	0.49%	$ 210,149	$ 208,363		
SANTA BARBARA	42	1.24%	5,726	0.74%	$ 313,853	$ 311,186		
SANTA CLARA	43	5.03%	23,887	3.08%	$ 1,309,290	$ 1,298,168		
SANTA CRUZ	44	0.77%	3,253	0.42%	$ 178,303	$ 176,788		
SHASTA	45	0.49%	6,236	0.80%	$ 341,807	$ 338,903		
SIERRA	46	0.01%	55	0.01%	$ 3,015	$ 50,000		
SISKIYOU	47	0.15%	1,645	0.21%	$ 90,165	$ 89,400		
SOLANO	48	1.14%	8,042	1.04%	$ 440,797	$ 437,052		
SONOMA	49	1.30%	5,548	0.72%	$ 304,096	$ 301,513		
STANISLAUS	50	1.25%	13,723	1.77%	$ 752,183	$ 745,793		
SUTTER	51	0.22%	1,649	0.21%	$ 90,385	$ 89,617		
TEHAMA	52	0.17%	1,744	0.23%	$ 95,592	$ 94,780		
TRINITY	53	0.04%	395	0.05%	$ 21,651	$ 50,000		
TULARE	54	1.05%	15,449	1.99%	$ 846,788	$ 839,595		
TUOLUMNE	55	0.16%	1,173	0.15%	$ 64,294	$ 63,748		
VENTURA	56	2.25%	8,566	1.11%	$ 469,518	$ 465,530		
YOLO	57	0.47%	4,152	0.54%	$ 227,579	$ 225,645		
YUBA	58	0.20%	2,899	0.37%	$ 158,899	$ 157,550		
Totals		100.00%	774,924	100.00%	$ 42,475,000	$ 42,477,457		

rl stiles
9/18/97

CalWORKs - Colleges

Application for CalWORKs Funding

Application Due: November 14, 1997

California Community Colleges
CalWORKs Unit
1107 9th Street
Sacramento, CA 95814

Appendix A
California Community Colleges
Welfare Reform Funding For CalWORKs Recipients
1997-98 Fiscal Year

ISTRICT	1995-96 AFDC Headcount	Total Welfare Reform Allocation	Coordination, Job Devlmnt, & Curriculum Development	Work Study	Child Care	Additional Child Care, Work Study, or Instruction
LLAN HANCOCK	1,418	$ 659,388	$ 158,253	$ 184,629	$ 151,659	$ 164,847
NTELOPE VALLEY	1,759	817,958	196,310	229,028	188,130	204,490
ARSTOW	329	152,989	36,717	42,837	35,187	38,248
UTTE	1,848	859,344	206,243	240,616	197,649	214,836
ABRILLO	857	398,516	95,644	111,584	91,659	99,629
ERRITOS	2,002	930,956	223,429	260,668	214,120	232,739
HABOT-LAS POSITAS	1,229	571,501	137,160	160,020	131,445	142,876
Chabot College	*1,057*					
Las Positas College	*172*					
HAFFEY	1,693	787,267	188,944	220,435	181,071	196,817
ITRUS	1,223	568,711	136,491	159,239	130,804	142,177
OAST	2,752	1,279,715	307,132	358,320	294,334	319,929
Coastline College	*798*					
Golden West College	*957*					
Orange Coast College	*997*					
OMPTON	1,662	772,851	185,484	216,398	177,756	193,213
ONTRA COSTA	3,416	1,588,484	381,236	444,776	365,351	397,121
Contra Costa College	*1,419*					
Diablo Valley College	*744*					
Los Medanos College	*1,253*					
ESERT	1,077	500,819	120,197	140,229	115,188	125,205
L CAMINO	2,006	932,816	223,876	261,188	214,548	233,204
EATHER RIVER	147	100,000	24,000	28,000	23,000	25,000
OOTHILL-DEANZA	1,610	748,671	179,681	209,628	172,194	187,168
DeAnza College	*1,218*					
Foothill College	*392*					
REMONT-NEWARK	369	171,590	41,182	48,045	39,466	42,897
Ohlone College						
AVILAN JT	426	198,095	47,543	55,467	45,562	49,523
LENDALE	1,535	713,795	171,311	199,863	164,173	178,448
ROSSMONT-CUYAMACA	2,188	1,017,448	244,188	284,885	234,013	254,362
Cuyamaca College	*560*					
Grossmont College	*1,628*					
ARTNELL	778	361,780	86,827	101,298	83,209	90,446
MPERIAL	1,617	751,926	180,462	210,539	172,943	187,982
ERN	2,850	1,325,287	318,069	371,080	304,816	331,322
Bakersfield College	*1,582*					
Cerro Coso College	*647*					
Porterville College	*621*					
AKE TAHOE	264	122,763	29,463	34,374	28,235	30,691
ASSEN	600	279,008	66,962	78,122	64,172	69,752
ONG BEACH	3,104	1,443,400	346,416	404,152	331,982	360,850
OS ANGELES	14,521	6,752,449	1,620,586	1,890,691	1,553,066	1,688,106
Los Angeles	*2,221*					
Angeles City	*2,775*					
Los Angeles Harbor	*848*					
Los Angeles Mission	*693*					
Los Angeles Pierce	*764*					

ISTRICT	1995-96 AFDC Headcount	Total Welfare Reform Allocation	Coordination, Job Devlmnt, & Curriculum Development	Work Study	Child Care	Additional Child Care Work Study, or Instruction
Angeles Southwest	*2,038*					
os Angeles Trade-Tech	*2,361*					
Los Angeles Valley	*1,685*					
West Los Angeles	*1,136*					
OS RIOS	6,852	$3,186,268	$ 764,704	$ 892,155	$ 732,842	$ 796,567
American River College	*2,461*					
Consumnes River College	*1,561*					
Sacramento City College	*2,830*					
ARIN	671	312,024	74,886	87,367	71,766	78,005
ENDOCINO-LAKE	620	288,308	69,194	80,726	66,311	72,077
ERCED	2,502	1,163,462	279,231	325,769	267,596	290,866
IRA COSTA	918	426,882	102,452	119,527	98,183	106,720
ONTEREY PENINSULA	472	219,486	52,677	61,456	50,482	54,871
T. SAN ANTONIO	2,051	953,741	228,898	267,047	219,360	238,436
T. SAN JACINTO	797	370,615	88,948	103,772	85,241	92,654
APA	545	253,432	60,824	70,961	58,289	63,358
ORTH ORANGE	1,849	859,809	206,354	240,747	197,756	214,952
Cypress College	*922*					
Fullerton College	*927*					
ALO VERDE	215	100,000	24,000	28,000	23,000	25,000
ALOMAR	1,426	663,108	159,146	185,670	152,515	165,777
ASADENA	2,310	1,074,180	257,803	300,770	247,061	268,546
ERALTA	4,873	2,266,007	543,842	634,482	521,182	566,501
College of Alameda	*1,021*					
Laney College	*2,254*					
t College	*1,285*					
Vista College	*313*					
ANCHO SANTIAGO	4,013	1,866,096	447,863	522,507	429,202	466,524
EDWOODS	1,012	470,593	112,942	131,766	108,236	117,649
IO HONDO	1,363	633,812	152,115	177,467	145,777	158,453
IVERSIDE	2,246	1,044,419	250,661	292,437	240,216	261,105
AN BERNARDINO	3,204	1,489,901	357,576	417,172	342,677	372,476
Crafton Hill College	*499*					
San Bernardino Valley College	*2,705*					
AN DIEGO	11,040	5,133,741	1,232,098	1,437,447	1,180,760	1,283,436
San Diego City College	*8,977*					
San Diego Mesa College	*1,522*					
an Diego Miramar College	*541*					
AN FRANCISCO	4,078	1,896,322	455,117	530,970	436,154	474,081
AN JOAQUIN	2,874	1,336,447	320,747	374,205	307,383	334,112
AN JOSE-EVERGREEN	2,354	1,094,640	262,714	306,499	251,767	273,660
Evergreen Valley College	*1,159*					
San Jose City College	*1,195*					
AN LUIS OBISPO	454	211,116	50,668	59,112	48,557	52,779
Cuesta College						
AN MATEO	924	429,672	103,121	120,308	98,825	107,418
Canada College	*244*					
College of San Mateo	*338*					
Skyline College	*342*					
ANTA BARBARA	792	368,290	88,390	103,121	84,707	92,072
ANTA CLARITA	230	106,953	25,669	29,947	24,599	26,738
\ MONICA	1,234	573,826	137,718	160,671	131,980	143,457
EQUOIAS	1,537	714,725	171,534	200,123	164,387	178,681
HASTA-TEHEMA -TRINITY	1,752	814,702	195,528	228,117	187,381	203,676
IERRA	824	383,171	91,961	107,288	88,129	95,793
ISKIYOU JOINT	466	216,696	52,007	60,675	49,840	54,174

ISTRICT	1995-96 AFDC Headcount	Total Welfare Reform Allocation	Coordination, Job Devlmnt, & Curriculum Development	Work Study	Child Care	Additional Child Care Work Study, or Instruction
NO COUNTY	965	448,737	107,697	125,646	103,210	112,184
ONOMA	1,622	754,251	181,020	211,190	173,478	188,563
Santa Rosa Junior College						
OUTH ORANGE	765	355,735	85,376	99,606	81,819	88,934
Irvine Valley College	*310*					
Saddleback College	*455*					
OUTHWESTERN	1,584	736,580	176,779	206,242	169,413	184,146
TATE CENTER	4,403	2,047,451	491,388	573,286	470,914	511,863
Fresno City College	*3,434*					
Kings River College	*969*					
ENTURA COUNTY	1,600	744,020	178,565	208,326	171,125	186,004
Moorpark College	*257*					
Oxnard College	*676*					
Ventura College	*667*					
ICTOR VALLEY	1,968	915,145	219,635	256,241	210,483	228,786
EST HILLS	491	228,321	54,797	63,930	52,514	57,080
EST KERN	249	115,788	27,789	32,421	26,631	28,947
Taft College						
EST VALLEY-MISSION	1,060	492,914	118,299	138,016	113,370	123,229
Mission College	*515*					
West Valley College	*545*					
OSEMITE	2,929	1,362,023	326,886	381,366	313,265	340,506
Columbia College	261					
Modesto Junior College	*2,668*					
URA	2,299	1,069,064	256,575	299,338	245,885	267,266
TATE TOTAL		$65,000,000	$15,600,000	$18,200,000	$14,950,000	$16,250,000

ote:
ach district's allocation is equal to the greater of $100,000 or approximately $465.01 for each AFDC welfare recipient enrolled the district in 1995-96. Of the district's total allocation, 24 percent is for coordination, job development and curriculum evelopment and redesign; 28 percent is for work study; 23 percent is for child care; and 25 percent is for additional child care, ork/study or unfunded instructional activities for CalWORKs recipients.

scal Services:8/26/97:RM
elfare.doc

Legislative Analyst's Office, November 17, 1997

H.R. 2015 Welfare-to-Work Program Fiscal Overview

H.R. 2015 Welfare-to-Work Program Fiscal Summary

(Dollars In Millions)

Total Nationwide Funding for Federal Fiscal Year (FFY) 1998		**$1,500.0**
Set asides for Native Americans and evaluation.	1.8%	(27.0)
Remaining balance.		1,473.0
Allocated for competitive grants.	25.0	368.3
Allocated to formula grants for states.	75.0	1,104.8
Total Formula Grant for California (Maximum Allotment)	**17.2%**	**$190.4**
• Projects likely to help long-term recipients (state discretionary funds).	15.0	28.6
• Allocated to Private Industry Councils (PICs)a/service delivery areas (SDAs).	85.0	161.9
• State must expend $1 in matching funds to receive $2 in federal funds.		

Funds Allocated to PICsa		**$161.9**
• Funds must be spent on eligible individuals and activities (see page 2).		
• For recipients on Temporary Assistance to Needy Families (TANF) for 30 or more months and that meet two of the three specified conditions, or certain noncustodial parents.	70.0%	113.3
• TANF recipients (or noncustodial parents of TANF recipients) who have characteristics associated with long-term welfare dependence.	30.0	48.6
Competitive Grants (Total Nationwide Funding Available)		**$368.3b**
• Eligible applicants are: (1) PICs; (2) cities, counties, and other political subdivisions; and (3) private entities in conjunction with PICs or political subdivisions.		
• The Secretary of Labor shall award grants based on effectiveness in:		
• Expanding knowledge on transitioning the least job-ready TANF recipients into employment.		
• Moving the least job-ready TANF recipients into nonsubsidized employment, especially in labor markets with a shortage of low-skill jobs.		
• In awarding grants, the Secretary of Labor *shall* consider the needs of rural areas and cities with large concentrations of poverty and *may* consider the following factors:		
• The track record of the applicant in moving individuals with employment barriers into work.		
• The ability of the applicant to leverage other resources.		
• Plans of cooperation with other entities.		

• Use of former TANF recipients as mentors, case managers, and service providers .
• Funds must be spent on eligible individuals and activities (see page 2).
aMay be allocated to a different entity if the Department of Labor approves state waiver request.
bNationwide amount. No specific allocation to states.

H.R. 2015 Welfare-to-Work Block Grant Programs
Eligible Individuals and Allowable Activities

All Welfare-to-Work funds (competitive grants, allocations to PICs, and the 15 percent state discretionary funds) must be spent on eligible individuals according to the 70/30 rule described below, and on allowable activities.

- **Eligible Individuals**

  At least 70 percent must be spent on recipients of TANF on aid 30 or more months and who meet two of the following three conditions:

  (i) No GED and low reading or math skills

  (ii) Requires substance abuse treatment

  (iii) Poor work history

  or; on noncustodial parents for which the custodial parent meets the above requirements.

  Up to 30 percent may be spent on TANF recipients (or noncustodial parents of TANF recipients) who have the characteristics associated with long-term welfare dependence (school dropout, teen pregnancy, or poor work history).

- **Welfare-to-Work Eligible Activities Are:**

- Community service or work experience programs.
- Job creation through public or private sector employment wage subsidies.
- Contracts with public or private providers of readiness, placement, and post-employment services.
- Job vouchers for placement, readiness, and post-employment services.
- Job retention or support services if such services are not otherwise available.

Requirements for State Match for Formula Grants

- States shall receive $2 in Welfare-to-Work formula grant funds for each $1 in state matching expenditures (up to the state maximum allotment).
- Once awarded, states have three years to spend the federal funds.
- State matching funds must be:
  - In excess of funds used for the TANF match.
  - Spent on Welfare-to-Work eligible recipients and activities.
- It is difficult to estimate how much current state spending counts toward the required match.
  - Depending on whether certain expenditures outside the Department of Social Services are countable toward the maintenance-of-effort (MOE), California is likely to be $30 million to $70 million above the MOE floor in 1997-98.
  - Determining which current expenditures are for Welfare-to-Work eligible individuals and allowable activities are difficult to estimate without seeing the regulations.
  - The countable match in the current appropriation could be up to $70 million.
- Local match opportunities should be explored.

H.R. 2015 Welfare-to-Work Program Options for Allocating Funds to Private Industry Councils (PICs)/ Service Delivery Areas (SDAs)

- Federal law establishes three allocation factors:
  - Excess poverty (number of persons in poverty above a 7.5 percent threshold).
  - Adults receiving TANF for 30 months or more.
  - The number of unemployed persons.
- Federal law requires that the first factor (excess poverty) be weighted at least 50 percent.
- States may weigh one of the other two factors up to 50 percent, or any combination of the other two factors where the total does not exceed 50 percent.
- States may use excess poverty as the sole factor.
- The attached sheet shows three examples of how funds can be allocated. To create the allocation factor for each SDA, the raw numbers for each factor within each SDA are expressed as a percent distribution with respect to the entire state.
- Determining the allocation formula is a policy issue for the Legislature and the administration.

H.R. 2015 Welfare-to-Work Grant Program	
Comparison of Potential Allocations to Service Delivery Areas (SDAs)(a)	

SDA NAME	Percent Distribution Persons in Poverty Above 7.5% Threshold	Allocation Assuming Excess Poverty Factor Weighted 100%	Percent Distribution of Long-term TANF Recipients	Allocation Assuming 50% Excess Poverty/ 50% Long Term TANF Receipt	Percent Distribution Unemployed Persons	Allocation Assuming 50% Excess Poverty/ 50% Unemployed Persons
ALAMEDA (excluding Oakland)	0.00%	-	1.88%	$1,521,614	1.77%	$1,430,237
OAKLAND	2.80	$4,527,624	2.41	4,212,936	1.25	3,277,196
MOTHER LODE	0.12	191,573	0.39	413,068	0.43	440,769
GOLDEN SIERRA	0.00	-	0.76	618,064	1.18	955,887
BUTTE	1.36	2,193,177	1.00	1,904,228	0.66	1,628,436
NORTH CENTRAL COUNTIES	1.28	2,068,970	1.17	1,978,555	1.29	2,076,618
CONTRA COSTA (excluding Richmond)	0.00	-	1.41	1,137,934	1.63	1,315,243
RICHMOND	0.50	814,602	0.48	798,821	0.38	716,347
FRESNO	6.19	10,014,666	4.21	8,411,284	4.33	8,507,462
HUMBOLDT	0.78	1,265,669	0.54	1,071,000	0.41	963,442
IMPERIAL	1.19	1,918,947	0.88	1,669,231	1.51	2,181,284
KERN/INYO/MONO	3.39	5,487,707	2.62	4,861,229	3.26	5,381,527
KINGS	0.59	953,767	0.43	822,085	0.50	880,081
NORTEC	0.81	1,309,546	0.95	1,427,511	0.86	1,351,924
LOS ANGELES COUNTY(b)	13.11	21,216,998	11.7	20,079,441	11.46	19,879,887
FOOTHILL	0.61	986,232	0.57	953,775	0.74	1,089,647
VERDUGO	0.81	1,304,893	1.85	2,150,369	0.91	1,392,720
CARSON/LOMITA/TORRANCE	0.00	-	0.40	321,049	0.65	524,660
LONG BEACH	2.57	4,153,563	2.24	3,886,213	1.39	3,205,160
LOS ANGELES CITY	26.18	42,370,397	11.49	30,485,159	14.67	33,058,325
MADERA	0.59	947,673	0.42	816,024	0.65	997,778
MARIN	0.00	-	0.19	150,550	0.39	316,233
MENDOCINO	0.35	567,186	0.35	567,718	0.32	542,329

MERCED	1.47	2,374,778	1.32	2,258,530	1.19	2,150,464
MONTEREY	0.83	1,345,556	0.80	1,318,604	1.76	2,095,828
NAPA	0.00	-	0.16	133,099	0.31	251,549
ORANGE (excluding Santa Ana and Anaheim)	0.00	-	3.07	2,487,308	3.29	2,659,235
RIVERSIDE	3.01	4,865,121	3.96	5,640,749	4.49	6,069,245
SACRAMENTO	3.33	5,395,078	5.86	7,442,796	2.93	5,069,289
SAN BENITO (c)	0.05	-	0.11	129,102	0.26	247,262
SAN BERNARDINO COUNTY	3.05	4,929,164	5.83	7,181,626	3.76	5,504,735
SAN BERNARDINO CITY	1.63	2,643,912	1.56	2,580,902	0.68	1,875,364
SAN DIEGO	5.75	9,311,529	7.47	10,699,970	5.83	9,370,517
SAN FRANCISCO	2.45	3,958,001	1.49	3,186,890	1.68	3,337,367
SAN JOAQUIN	2.54	4,112,456	2.58	4,142,193	2.40	3,996,751
SAN LUIS OBISPO	0.69	1,117,086	0.38	865,513	0.51	968,209
SAN MATEO	0.00	-	0.52	418,494	1.13	912,765
SANTA BARBARA	1.20	1,939,334	0.68	1,520,150	0.97	1,753,063
SANTA CLARA (excluding NOVA)	0.56	900,805	3.06	2,924,393	2.25	2,268,744
NOVA	0.00	-	0.39	315,862	0.62	503,099
SANTA CRUZ	0.45	724,633	0.44	714,974	1.03	1,196,023
SHASTA	0.60	976,370	0.80	1,133,852	0.63	998,471
SOLANO	0.00	-	0.96	775,435	1.17	948,700
SONOMA	0.00	-	0.72	579,673	0.90	725,899
STANISLAUS	1.61	2,609,120	1.94	2,874,785	2.45	3,288,206
TULARE	3.13	5,066,999	2.01	4,159,724	2.26	4,366,216
VENTURA	0.00	-	1.05	853,169	2.40	1,940,523
YOLO	0.88	1,416,801	0.52	1,127,846	0.49	1,103,692
SOUTH BAY	0.92	1,486,162	1.36	1,840,151	1.31	1,799,588
SELACO	0.08	126,755	1.13	975,157	1.08	940,207
ANAHEIM	0.54	881,193	0.71	1,019,000	0.63	950,882

SANTA ANA	2.04	3,302,286	0.80	2,296,193	0.99	2,448,914
Subtotal--Allocated to SDAs	**100%**	**$161,776,329**	**100%**	**$161,854,000**	**100%**	**$161,854,000**
Additional State Discretionary(c)		$77,671		-		-
Total Funds		**$161,854,000**		**$161,854,000**		**$161,854,000**
Source: Department of Social Services (DSS) and Employment Development Department (EDD) provided the factors used to calculate these potential allocations to SDAs.						
Note that poverty data is based on 1990 census, TANF receipt data is for recipients in FFY 1997 who had at least 30 months of aid since 1987.						
Unemployment data is based on 1996 annual averages.						
(a) Assumes California receives the maximum grant of $190,417,000 and allocates 85 percent to SDAs.						
(b) Excluding allocations to other SDAs within LA county shown in this table: LA City, South Bay, Carson/Lomita/Torance, Long Beach, Verdugo, Foothill, and SELACO.						
(c) Pursuant to H.R. 2015, no allocation for SDA under $100,000; such funds redirected to state discretionary "15%" allocation.						

Return to LAO Home Page