



CDSS

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**DEPARTMENT OF SOCIAL SERVICES**

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EDMUND G. BROWN JR.  
GOVERNOR

REASON FOR THIS TRANSMITTAL

- State Law Change
- Federal Law or Regulation Change
- Court Order
- Clarification Requested by One or More Counties
- Initiated by CDSS

June 20, 2014

ALL-COUNTY INFORMATION NOTICE NO. I-27-14

TO: ALL COUNTY WELFARE DIRECTORS

SUBJECT: FEDERAL FISCAL YEAR 2015 PLAN TEMPLATE,  
PRELIMINARY ALLOCATIONS, AND POLICY GUIDELINES FOR  
COUNTIES PARTICIPATING IN THE CALFRESH EMPLOYMENT  
AND TRAINING PROGRAM

REFERENCE: MANUAL OF POLICIES AND PROCEDURES, DIVISION 63,  
SECTIONS 63-407

This letter transmits the Federal Fiscal Year (FFY) 2015 CalFresh Employment and Training (E&T) preliminary allocations, plan template and policy guidelines to be used by counties participating in the E&T program. These documents have already been informally transmitted to counties to enable them to prepare both the text and budgets for their CalFresh E&T plans. When transmitting the 100 percent E&T allocations, counties were given a June 20 due date for submitting their E&T plans.

Consistent with federal and state regulations, counties who want to participate in CalFresh E&T must submit a completed E&T plan to the California Department of Social Services (CDSS) for review and approval. Data from approved county plans will be incorporated into California's statewide E&T plan. Counties who failed to submit their E&T plan without an approved extension may be denied participation in the E&T program during FFY 2015 and their E&T allocation may be re-distributed among participating counties. CDSS has until August 15, 2014 to review, approve, and consolidate county plans into a state plan which is forwarded to the Food and Nutrition Service (FNS) for review.

On May 13, 2014, FNS issued Administrative Notice 14-32 which transmits preliminary 100 percent federal E&T allocations for FFY 2015. These allocations are subject to change, but have been released so that state agencies may begin preparing their 2015 E&T plan budgets. California's preliminary allocation for FFY 2015 is \$7,820,767.

Twenty-four counties have indicated their intent to operate an E&T program in FFY 2015. CDSS has withheld \$800,000 from the preliminary federal allocation to cover state

administrative costs and to provide workers' compensation coverage for program participants. The remaining \$7,020,767 has been distributed among E&T counties based on their average monthly caseload. The preliminary allocations are displayed on the attached table.

Nearly all counties will spend more than their 100 percent grant in administering their E&T program. Such counties will be reimbursed for 50 percent of additional approved expenditures identified in their E&T plan budget. Counties may also be reimbursed for 50 percent of approved participant reimbursements including transportation and ancillary costs. Participant reimbursement for dependent care costs are limited to the actual amount paid or the Regional Market Rate, whichever is lowest. Dependent care costs paid by the county which are in excess of this limit must be paid with 100 percent county funds. Additional E&T funding information is contained in Part II of the attached policy guidelines.

The E&T template for FFY 2015 (Enclosure 2) has undergone minor revisions for increased clarity. The updated template must be used for plan completion and all previous versions of the template should be discarded. Counties must complete all sections and tables within the template. If certain optional provisions of the E&T template are not relevant to the county's E&T program, the county should indicate that these provisions are not applicable. As discussed below, E&T plans must be submitted in Microsoft Word using the document previously distributed to E&T counties.

A clear understanding of E&T terminology, funding rules, and participation requirements is essential in effectively administering an E&T program. Therefore, we have attached updated policy guidelines (Enclosure 3) to assist E&T counties. The guidelines address a variety of subjects and are consistent with current federal policies. We strongly encourage county staff to read the policy guidelines. Counties should also read All County Information Notice (ACIN) I-01-13 which defines work registration policies as well as All County Letters 12-03 and 13-107 which explains E&T policies implemented by Senate Bill (SB) 43 and SB 134.

To ensure that all aspects of the county's E&T program are consistent with CDSS policies and procedures, all entities involved in the design and administration of E&T are encouraged to collectively meet on a regular basis. These meetings will foster a more cohesive approach to E&T administration and allow affected policy and fiscal units to share their expertise when addressing outstanding issues. Such interaction can positively contribute to the development of a quality E&T plan. Affected entities include those that have responsibility for the following functions:

- Preparing the E&T plan;
- Negotiating and overseeing contractual agreements;
- Developing the E&T budget;
- Managing E&T cases and monitoring program participation;

- Submitting E&T financial claims; and
- Compiling data for the STAT 47 and 48 reports.

The template accompanying this ACIN is a PDF file and is strictly for informational purposes. An e-mail transmitting a copy of the template as a Microsoft Word document was sent to E&T counties on April 9, 2014 for use in preparing their plans. A county should inform CDSS within three working days from the issuance of this ACIN if it did not receive a Microsoft Word copy of the E&T template. The county should e-mail updated contact information to Bill Belon at [William.Belon@dss.ca.gov](mailto:William.Belon@dss.ca.gov). The contact information should include the name, title, telephone number, fax, and e-mail address of the individual who has primary responsibility for preparing the E&T plan. A secondary contact person and his/her contact information should also be identified in case the primary contact is not available.

If you haven't already done so, please e-mail your E&T plan in Microsoft Word to Robert Nevins at [Robert.Nevins@dss.ca.gov](mailto:Robert.Nevins@dss.ca.gov). It is not necessary for you to send a signed copy of the plan until it has been reviewed by CDSS staff and any requested revisions have been made. Upon receiving state approval of your E&T plan, please send a hard copy to CDSS using the following contact information:

ATTN: Mr. William Belon, CalFresh Analyst  
California Department of Social Services  
CalFresh Branch  
744 P Street, M.S. 8-9-32  
Sacramento, CA 95814

If you have questions regarding preparation of the STAT 47 or STAT 48 reports, please contact Sunit Mayall of the Data Systems and Survey Design Bureau at (916) 657-1642. If you have any questions about this letter or the preparation of your E&T plan, please contact Robert Nevins at (916) 654-1408, or Bill Belon at (916) 654-1905.

Sincerely,

***Original Document Signed By:***

LINDA PATTERSON, Chief  
CalFresh Branch

Enclosures:

- 2015 County E&T Preliminary Allocation Table (Enclosure 1)
- 2015 E&T Template (Enclosure 2)
- 2015 E&T Policy Guidelines (Enclosure 3)

<b>County</b>	<b>Average Monthly Caseload 12 Months</b>	<b>% to Total</b>	<b>CalFresh E&amp;T 100 % Federal Grant Allocation</b>
ALAMEDA	56,925	0.044849	314,874
FRESNO	74,176	0.058441	410,301
HUMBOLDT	7,792	0.006139	43,100
KERN	48,517	0.038225	268,369
LOS ANGELES	464,513	0.365973	2,569,412
MARIN	4,926	0.003881	27,248
MENDOCINO	6,267	0.004938	34,669
MONTEREY	16,958	0.013361	93,804
ORANGE	76,967	0.060639	425,732
RIVERSIDE	97,925	0.077151	541,659
SACRAMENTO	77,036	0.060694	426,118
SAN DIEGO	113,704	0.089583	628,941
SAN FRANCISCO	28,707	0.022617	158,789
SAN JOAQUIN	19,061	0.015017	105,431
SAN LUIS OBISPO	7,899	0.006223	43,690
SAN MATEO	12,725	0.010026	70,390
SANTA BARBARA	12,122	0.009550	67,048
SANTA CLARA	44,446	0.035017	245,846
SANTA CRUZ	10,386	0.008183	57,451
SHASTA	10,243	0.008070	56,658
SONOMA	16,538	0.013030	91,481
STANISLAUS	35,074	0.027634	194,012
TRINITY	726	0.000572	4,016
VENTURA	25,623	0.020187	141,728
<b>TOTALS</b>	<b>1,269,256</b>	<b>100.0000%</b>	<b>\$7,020,767</b>

CalFresh Employment and Training (E&T)

County Plan Template and Instructions

COUNTY PLAN COVER SHEET

(To be completed by counties offering E&T in Federal Fiscal Year (FFY) 2015)

This template has been prepared by the California Department of Social Services (CDSS), CalFresh Branch.

The due date for submission of county E&T plans to CDSS is June 20, 2014. Counties who do not submit E&T plans by this date may be denied participation in CalFresh E&T for FFY 2015. County E&T plans will not be reviewed or approved unless they are submitted using the FFY 2015 E&T template.

Name of County:_____
Name of Primary E&T Contact:
Title:
Telephone:
Fax:
E-mail:
Name of Secondary Contact:
Secondary Contact Title:
Secondary Contact Telephone:
Secondary Contact E-mail:

Date Submitted:
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**PART I**  
**SUMMARY OF COUNTY E&T PROGRAM**

Part I of the county E&T plan summarizes the E&T program that the county plans to implement. In this section, counties provide a narrative description of their E&T program, identify any substantive changes they intend to make, and specify how they will most effectively use E&T funds. Please complete the following entries:

**A. Program Summary**

Please provide a narrative description of your county's E&T program. The summary should briefly describe the county's E&T components, identify the organizations involved in administering E&T, and note the types of expenditures for which participants will be reimbursed.

**B. Program Changes**

Describe the nature of the changes being made to the E&T program. Examples of program changes include the addition or removal of E&T components, a shift in the county's E&T target population(s), or a change in the types of expenditures and services for which participants will be reimbursed.

**C. Effective Use Of E&T Funds**

Welfare and Institutions Code Section 18926.5 requires counties to include language in their E&T plan that identifies the steps they will take or are currently taking to most effectively use E&T funds in administering their program components. To accomplish this task, counties should evaluate the success of their E&T program for the previous year based on programmatic and statistical data. Counties should develop and maintain procedures for gathering, storing, and consolidating E&T outcome data. A table and explanatory text should be used for identification of outcome data included in the E&T plan.

In this section, counties must include outcome data for FFY 2014 or FFY 2013 if more recent data is not yet available. The data should demonstrate a positive connection between E&T participation and the acquisition of employment or attainment of important pre-employment benchmarks. Such data can include the number of participants who obtained employment, duration of job retention, the types of employment found, pay ranges, completion of training, etc.

In addition to outcome data, counties should identify their program goals for FFY 2015 and describe those steps they will take in determining whether their goals were met. County E&T program goals will vary based on the size and scope of their E&T program. Counties should be purposeful, but also reasonable in the development of program goals and the means for evaluating the achievement of such goals. Program goals will

typically revolve around the acquisition and retention of employment and the successful completion of E&T activities which improve employability e.g., graduation from high school or college, consistent participation in intensive job search and job club, or successful completion of a work experience component.

Examples of steps counties will take to achieve their goals include assessing the effectiveness of E&T components, updating administrative procedures, notices/forms, and desk guides for consistency with current E&T policies, improving case management, closely monitoring E&T contracts and program participation, ensuring that participants are reimbursed for the cost of transportation and other allowable ancillary expenditures, etc. Counties should consider eliminating those components which have consistently yielded little positive outcomes data and replacing them with components that may prove to be more effective.

## PART II PROGRAM SUMMARIES AND E&T PARTICIPATION COUNTS

Note: Prior to completing this part, counties are encouraged to read the description of E&T program components contained in Part III of the FFY 2015 E&T Policy Guidelines.

### A. Component Summaries

In this part, counties must provide a detailed and clearly written description of each E&T component being offered in FFY 2015. Components will only be approved if required activities and hours of participation are consistent with federal and state E&T requirements. County-specific acronyms should first be spelled out prior to their use throughout the plan.

In completing this section, counties must remember the following:

- Assessment by itself is not a component/activity.
- Screening is not a component/activity.
- Hours of participation in a workfare, self-initiated workfare, or work experience component are determined by dividing the household's monthly CalFresh allotment by the higher of the federal or state minimum wage. E&T volunteers can choose to participate for additional hours beyond this limit, but are not required to do so.
- When a county offers 30-day job search prior to workfare, this activity must be included in the component description for workfare. The 30-day job search activity is not a separate component, but is considered part of workfare. Therefore, counties should not use a separate component template for this activity.
- When a component includes concurrent activities, the component name must reflect all the activities associated with that component, e.g., Job Club/Job Search.
- To be considered acceptable, an E&T component should typically involve a minimum of 12 hours per month.

## Enclosure 2

- The maximum number of hours that can be required of an E&T mandatory participant is 30 hours per week or 120 hours per month. E&T volunteers may choose to participate for additional hours beyond this limit.
- If anti-drug, anti-alcohol and mental health discussions are offered, these activities must be described in the component summary for each component to which they are linked. For example, if generalized anti-substance abuse discussions are offered as part of vocational training, a description of these services must be included in the component summary for this activity. Note: Consistent with federal policy instructions contained in the E&T toolkit which was transmitted to states by Administrative Notice 11-16, anti-substance abuse and mental health services funded with E&T dollars are limited to those activities described in Part III of the FFY 2015 E&T Policy Guidelines.
- If job retention services are included in the county's E&T program, a complete description of these services must be provided using a component template with corresponding cost entries included on Table 1.
- If an E&T component is a voluntary component, CalFresh sanctions must not be imposed for failure to comply with participation requirements. Language must be included in the component description which identifies the component as a voluntary activity and clarifies that sanctions are not imposed for noncompliance.

Use the following template in describing the county's E&T components. The cost of each component must be shown on Table 1.

1. Component Name- List the name of the component.
2. Component Description- Provide a detailed description of the E&T component. The component description should identify such things as the activities that comprise the component, the sequence of activities if the component is multi-faceted, time frames for component participation, specific tasks performed by the participant as part of his/her participation in the component, and the types of reimbursement and services provided to assist participants in effectively satisfying participation requirements. Please be thorough and specific.
3. Participation Requirements- Identify the length of the component and the weekly/monthly participation requirements. If the component involves more than one activity (e.g., job search and workfare), identify the participation requirements for both activities and explain whether these activities are offered sequentially or concurrently.
4. Organizational Responsibilities- Identify the various entities involved and their respective roles in administering the component. Organizational responsibilities include such things as assessing participants' skills and needs, conducting training in E&T activities such as job club and work experience, referring participants to E&T contractors and service providers, providing one on one case management directly related to E&T participation, issuing participant reimbursements, monitoring and tracking E&T participation, making good cause determinations, and issuing notices of disqualification for noncompliance with mandatory E&T component requirements. If the county contracts with an outside



vendor to administer all or part of the component, the responsibilities delegated to the vendor should be identified.

5. Geographic Areas Covered- Identify those geographic areas within the county in which the component will be operative. The component may be offered countywide or the county may choose to limit the component to specific districts, neighborhoods, college campuses, etc.
6. Targeted Populations- Identify who among the CalFresh population is targeted to participate in the component.

**B. E&T Participation**

This section contains estimates both for the anticipated number of Able-Bodied Adults Without Dependents (ABAWDs) and non-ABAWDs who will participate in each component offered by the county as well as the unduplicated number of individuals who will participate in the E&T program during the year.

1. Estimated E&T Component Placements



This section captures both monthly and annual estimates for the number of persons who will participate in each of the county's E&T components. It also gathers monthly and annual estimates for the number of participants who will receive E&T participant reimbursements. Counties should include separate entries for each of their E&T components.

In completing this section, counties must remember the following:

- The estimates in this section are duplicate counts. Participants are counted for each month of participation and for all components in which they participate. Thus, the monthly counts of ABAWDs and Non-ABAWDs include both new and existing participants expected to be in the component each month. For example, an ABAWD who participates for two months in job club would be counted for each month of participation.
- Persons are also counted for each component in which they participate. If the county's E&T program is designed so that an individual participates in multiple components simultaneously, the same individual should be included in the estimated number of participants for each of the multiple components e.g., once for job club and once for job search.
- Columns E through H ask for the monthly and annual number of persons who will receive reimbursements for transportation/ancillary expenses and for dependent care. These are also duplicate counts.
- For each component, monthly and annual estimates for persons receiving transportation/ancillary and dependent care reimbursements must not exceed participant estimates in columns C and D.

## Enclosure 2

- If the county does not offer the component throughout the year, the totals for entries D, F and H are determined by multiplying columns C, E and G by the number of months for which the component is operative during the FFY.

	A	B	C	D	E	F	G	H
 Component 	ABAWD Each Month	Non- ABAWD Each Month	Total Monthly (A+B)	Annual Participation (C x number of months component is offered)	Persons Receiving Transportation and Ancillary Services Each Month	Annual Person Reimbursed (E x number of months component is offered)	Persons Receiving Dependent Care Each Month	Annual Person Reimbursed (G x number of months component is offered)
Job Search								
Job Club								
Workfare								
Self- Initiated Workfare								
Work Experience								
Vocational Training								
Education								
Job Retention								
Other								

### 2. Estimated Individual Participation

Unlike Section 1, this section asks for an unduplicated count of E&T participants. Each individual must only be counted once for the year regardless of the number of components the individual will be assigned to or the anticipated number of months the individual will participate. Thus, an individual who participates in job search for

two months followed by workfare for three months would only be counted once in this section.

Provide an estimated count of individuals expected to participate in the E&T program during the fiscal year. - \_\_\_\_\_

**Part III  
WORK REGISTRANTS, ABAWDs, AND E&T DEFERRALS**

This part consists of county estimates of work registrants, deferred E&T participants, and ABAWDs for the upcoming fiscal year. Data sources for preparing these estimates may include county generated reports, manual counts, and numbers previously reported by the county on the following forms:

- The Annual Work Registrant and CalFresh Employment & Training (E&T) Program Caseload Report (STAT 48)
- The CalFresh Program Work Registrant, Able-Bodied Adults Without Dependents (ABAWD), and CalFresh Employment and Training (E&T) Program Caseload Report (STAT 47)

Data tables for the STAT 48 and STAT 47 can be found at the following two websites:

<http://www.cdss.ca.gov/research/PG359.htm>

<http://www.cdss.ca.gov/research/PG360.htm>

Counties are encouraged to review the above data reports as well as the policy instructions released in All County Information Notice I-01-13 (Policies and Procedures for CalFresh Work Registration) prior to preparing their estimates. It is essential that counties have an accurate understanding of which CalFresh recipients should be included in their estimates for work registrant and ABAWDs. Counties should remember the following in preparing their estimates:

- The work registrant population is the largest population captured in the template.
- The ABAWD population is a subset of the work registrant population. ABAWDs and work registrants are not distinct unrelated groups, but the ABAWD population is a smaller population within the work registrant population.
- There are always fewer ABAWDs in the county than there are work registrants because additional exemptions have been established for the ABAWD work requirement, which are not included in the list of work registration exemptions (see MPP Section 63-407.21, 63-410.32, and the definitions contained in Part VI of the FFY 2015 policy guidelines.
- Work registrants and ABAWDs should be included in a county's estimates, irrespective of whether they participate in E&T.
- Persons who do not qualify for an ABAWD exemption are counted as ABAWDs even if they reside in a county with an ABAWD waiver, or are granted the 15 percent ABAWD exemption. Such persons are not considered exempt from the ABAWD work requirement.

Once a county has estimated the size of its work registrant population, it should use this population as its base for determining estimates for the number of ABAWDs in the county. The county should estimate the number of work registrants who qualify for the ABAWD exemptions based on age, pregnancy, and living in a CalFresh household with a child under age 18. These persons would be deducted from the work registrant count and the remaining work registrants would represent the county's ABAWD population.

counties are reminded that the estimates of work registrants and ABAWDs contained in this part should be based on unduplicated counts. Currently, the ABAWD count on the STAT 47 is a duplicated count and there is currently no entry for ABAWD counts on the Stat 48. CDSS is in the process of revising the reports to address both of these issues. In the meantime, counties should use other sources and methods in projecting an October 1 ABAWD estimate and do their best to ensure that their work registrant and ABAWD estimates are unduplicated.

**A. Work Registrant Population**

Please be as accurate as possible in developing these estimates. This may require the use of multiple sources. Use data from the current fiscal year, whenever possible, in formulating the initial estimates. Adjustments should then be made based on notable trends in the size of the CalFresh caseload. Please avoid using the same estimates from previous years without performing necessary research. This is especially true if other reports suggest a change in the size and/or characteristics of the non-assistance CalFresh population.

1. Work Registrant Counts - Estimate the following:
  - a. The number of work registrants in the existing CalFresh caseload expected to be in the county on October 1, 2014 (Part A, entry 1 of the STAT 48 form). - \_\_\_\_\_
  - b. The anticipated number of new work registrants to be added between October 1, 2014 and September 30, 2015. - \_\_\_\_\_

This estimate may be consistent with the cumulative total of four consecutive quarters worth of data from Part A, entry 1 of the STAT 47 report. However, counties may need to consult additional sources in developing reasonable estimates.

- c. The total number of work registrants in the county between October 1 and September 30 of the fiscal year (a+b=c). - \_\_\_\_\_

**2. Unduplicated or Duplicated Work Registrant Count**

To the best of their ability, counties are required to give an unduplicated count of work registrants. Individuals included in the work registrant count on October 1 should not be included in any subsequent count of work registrants for the remainder of the year. In

addition, individuals certified for CalFresh or registered for work more than once in a 12-month period should only be reported as a work registrant once during that 12-month period.

- a. Indicate whether the count of work registrants is unduplicated or duplicated.
- b. Identify the sources for preparing work registrant estimates and note any methods employed to eliminate duplicate counts.

**B. Deferral Policy**

Counties may temporarily defer work registrants from E&T participation. E&T deferrals are listed at Manual of Policies and Procedures Section 63-407.811. Counties may also defer work registrants for reasons not included in CDSS regulations. However, additional deferral categories should be identified in the table below for review and approval by CDSS.

Effective January 1, 2012, SB 43 adds new deferral criteria to which all E&T counties must adhere, irrespective of their existing deferral policies. Work registrants must be deferred from participation if they are:

- o Under 18 years of age or 50 years of age or over;
- o Living in a CalFresh household with a child under the age of 18, regardless of whether or not the child is receiving, or is eligible to receive, CalFresh benefits; or
- o Living in a federally determined work surplus area.

With the passage of SB 134, work registrants who are veterans that have been honorably discharged from the United States Armed Forces shall be deferred from CalFresh E&T. This new deferral took effect January 1, 2014. Policies established by SB 134 and implementation instructions are contained in All County Letter (ACL) 107-13 dated December 30, 2013.

Note: Those counties in which all E&T components are voluntary activities and those counties that have been designated as a work surplus area in their entirety are not required to include estimates in this section. Counties that meet either of these criteria should identify themselves as voluntary or work surplus counties in this section and the deferral table should either be deleted or untouched.

1. Deferral Counts - Using the table below, identify the county's E&T deferral criteria and the estimated number of persons who will be deferred:

Reason For Deferral	Number of Work Registrants Deferred
(a) living in a federally determined work surplus area	
(b) lacks dependent care	
(c) lacks transportation to an E&T Program	

site	
(d) lives an unreasonable distance from the E&T program site	
(e) has a severe family crisis	
(f) temporarily unemployed and expected to return to work within 60 days	
(g) involved in legal difficulties	
(h) has a temporary illness or disability	
(i) under the age of 18 or 50 years of age or older	
(j) living in a CalFresh household with a child under the age of 18 regardless of the child's CalFresh status	
(k) is pregnant	
(l) is an honorably discharged United States veteran	
(m) Other	
total number of deferred work registrants [add (a) through (m)]	

2. Re-evaluating Deferrals - Indicate the frequency with which an individual's deferral status is re-evaluated.

**C. ABAWD Population**

See the instructions at the beginning of Part III prior to completing this section. Please be as accurate as possible in developing these estimates. This may require the use of multiple sources. Use data from the current fiscal year, whenever possible, in formulating the initial estimates. Adjustments should then be made based on notable trends in the size of the CalFresh caseload. Please avoid using the same estimates from previous years without performing necessary research. This is especially true if other reports suggest a change in the size and/or characteristics of the non-assistance CalFresh population.

1. ABAWD Counts - Estimate the following:

- a. The number of ABAWDs in the existing CalFresh caseload expected to be in the county on October 1, 2014. - \_\_\_\_\_
- b. The anticipated number of new ABAWDs to be added between October 1, 2014 and September 30, 2015. - \_\_\_\_\_
- c. The total number of ABAWDs in the county between October 1 and September 30 of the fiscal year (a+b=c). - \_\_\_\_\_

2. Unduplicated or Duplicated ABAWD Count

Note: ABAWD counts on the STAT 47 are duplicate counts. Counties should adjust their ABAWD numbers to reflect an unduplicated estimate.

- a. Indicate whether the count of ABAWDs is unduplicated or duplicated.
- b. Identify the sources for preparing ABAWD estimates and note any methods employed to eliminate duplicate counts.

#### D. Meeting Ongoing Federal Reporting Requirements

In this section, counties provide an explanation of how work registrant and ABAWD data is collected and compiled for inclusion in the CalFresh E&T plans.

1. Method of Gathering Data - Describe the method used to gather work registration and ABAWD data; e.g., automated systems, aggregated hard copy reports from local agencies. This includes the point in time work registrant and ABAWD counts on October 1 and the count of work registrants and ABAWDs for the remainder of the year.
  2. Local reporting requirements - Specify whether contractors will be required to submit regular reports to the county, identify the information that will be contained in such reports, and note the frequency with which local agencies and contractors must report data.
- 

### PART IV PROGRAM ADMINISTRATION

#### A. General Program Procedures

In this section, please provide a detailed narrative description of the procedures developed by the county for serving E&T participants. Include the agencies involved in administering the program and Estimate the time frames for carrying out the various processes. The narrative should address procedures for the following functions:

- Work registration;
- Screening for E&T participation;
- E&T assessments;
- E&T component placement, including referral to service providers and contractors;
- Monitoring E&T participation;
- Good cause determination for noncompliance with mandatory participation requirements; and
- Imposing CalFresh sanctions for those E&T components that are not voluntary activities.

#### B. Interagency Coordination

## Enclosure 2

Describe any linkages between the E&T program and other programs. The description should include the methods established to coordinate the delivery of E&T services (e.g., non-financial interagency agreements, contracts, Memorandum of Understanding (MOU), joint plans of operation, and informal referrals to other agencies or programs). Examples of agencies or programs with which the E&T program may be linked includes, but is not limited to the following:

- The county's General Assistance (GA) program;
- Community Based Organizations (CBOs);
- Community colleges;
- Vocational education agencies;
- Adult education schools;
- Social service agencies;
- CalWORKs Welfare-To-Work;
- One-stop centers established under the Work Investment Act (WIA); and
- Employment Development Department (EDD).

### C. Contractual Arrangements

If the county anticipates contracting out any portions of the E&T program, provide a narrative description of the county's contractual arrangements. List the various contractors, the services they will provide, and the cost of each contract. Please be specific and thorough in the description of services to be provided. All contracts must be maintained by the county and be available for review by CDSS and the Food and Nutrition Service (FNS) upon request.

### D. Summary of County Administration and Interagency Coordination for the E&T Program

In this section, summarize the means by which the county administers the E&T program, including its collaboration with other agencies and programs. The county may administer E&T internally, work in concert with other employment and training programs, contract for the provision of services, maintain interagency agreements, or informally refer participants to outside organizations.

For each entry on the following table, list the agencies involved, the estimated annual number of E&T placements expected in the FFY, and the method of delivering E&T services (e.g., internal administration, MOUs, contractual arrangements, or informal referrals). For all entries which are not applicable to the county's E&T program, insert N/A in the column entitled Agencies Involved.

Note: Estimated placements for column 3 are duplicate counts as a participant is counted as placed for each month of participation.

<u>E&amp;T Administration</u>	<u>Agencies Involved</u>	<u>Annual Number of E&amp;T Placements Expected</u>	<u>Methods for Delivering Services</u>
Delivers an E&T component			



The E&T program delivers a service for another agency or program			
Joint component of the E&T program and another agency or program			
Referral of individuals from the E&T program to another program or agency			
Other forms of coordination (specify)			

PART V  
PROGRAM COSTS AND FINANCIAL MANAGEMENT

Note: Acceptance of the county’s estimated E&T budget does not constitute approval for the release of funds. Approval and release of E&T funds to the county is contingent upon FNS’ approval of the state E&T plan, issuance of a County Fiscal Letter providing the county’s E&T allocations, and submission of the County Expense Claim, which must reflect actual allowable expenditures. Costs are allowed only with approval from CDSS and must be adequately documented to ensure that they are necessary, reasonable, and properly allocated to the E&T program.

To ensure compliance with E&T funding requirements, see Part II of the E&T Policy Guidelines.

A. Administrative Budget

Provide a narrative description of the costs of administering E&T. The narrative should include such things as the number of positions represented by the cost for salary and benefits, examples of E&T overhead expenditures, and the types and number of contracts used to deliver E&T services. If the county plans to use interagency agreements involving a transfer of funds to another agency of the county government, address the basis of charges for CalFresh participants and the method for monitoring the agreements.

B. Justification of Education Costs

Federal E&T funds, whether 100 percent dollars or 50 percent reimbursement matching funds must not be used to supplant non-federal funds being used for existing services and activities. Thus, counties are prohibited from using federal E&T funds to pay for education services if such

services can be funded with state and local dollars. Counties may use federal E&T funds to operate an approved education component only to the extent that E&T component costs exceed the normal cost of services provided to students not participating in E&T.

Federal funds can be used to pay for some education activities and support services offered through community colleges, as long as such services are above and beyond those offered to non-E&T students or offered at cost. E&T dollars can also be used to pay for the cost of tuition and case management. More detailed funding requirements for education are outlined in Part II, section F of the E&T Policy Guidelines.

If the E&T plan includes education components, explain why the cost of such components can only be met through E&T and not through other existing education programs. Specify whether or not the services being provided are available to persons other than E&T participants and if so, identify the cost of providing these services.

### C. Participant Reimbursement

The county is responsible for reimbursing participants for necessary and reasonable expenses incurred in fulfilling E&T requirements. Expenditures that may be included in this category are transportation, dependent care, books, training manuals, uniforms or other special equipment, and any other necessary, reasonable, and properly allocated cost that a participant incurs for participation in the E&T program. Participant reimbursements must not be paid for with 100 percent federal grant or 50 percent matched administrative cost funding.

Describe the county's policies and procedures for participant reimbursements. Please be thorough and specific. If E&T funds are not used, explain how participants are reimbursed for necessary services.

At a minimum, the policy description for participant reimbursements should include the following:

- The expenditures for which participants will be reimbursed;
- The method for calculating the reimbursement (actual cost or some other method developed by the county);
- The procedure for reimbursing participants (in advance, in arrears, upon request, etc).

### D. Cost Allocation

If E&T is being offered in conjunction with other employment programs serving recipients of other forms of assistance, identify the employment programs being utilized (e.g., CalWORKs welfare to work components). Summarize how shared costs will be allocated among the pertinent programs (e.g., through monthly time studies).

Part VI  
E&T BUDGET FOR FFY 2015

The following two tables capture the county's E&T budget for FFY 2015. Table 1 breaks out county expenditures by E&T component and Table 2 breaks out expenditures by funding source (i.e., federal and county dollars).

#### Instructions for Completing Tables

- Do not use decimals or fractions on either table.
- Total projected expenditures for administration, dependent care, transportation/ancillary costs as well as the grand total on Table 1 must be equal to those on Table 2.
- Use actual spending for the current operating year as a starting point for future budget projections, not the levels projected in previous county E&T plans.
- If two or more components are offered concurrently, separate out costs based on projected expenditures for each component on Table 1.
- For each component where assessment costs are applicable, those costs must be included in the Salary & Benefits column of the appropriate component.

TABLE 1

OPERATING BUDGET

	Component	A Salary & Benefits	B Other Costs (Overhead)	C Contract Costs	D Sub-total (A thru C)	E Dependent Care	F Transportation / Ancillary	G Total (D+ E+F)
1	Job Search							
2	Job Club							
3	Workfare							
4	Self-Initiated Workfare							
5	Work Experience							
6	Vocational Training							
7	Education							
8	Job Retention							
9	Other							
10	Subtotals (Lines 1 thru 9)							
							Grand Total	

TABLE 2: FFY 2015 PLANNED COSTS BY FUNDING CATEGORY

COUNTY: \_\_\_\_\_

	<u>Funding Categories</u>	<u>Estimates of Cost</u>
1	100 Percent Federal E&T Grant	
2	Overmatch for Administration Cost	
2a	50 Percent Federal	
2b	50 Percent County	
2c	<u>Subtotal</u> for Overmatch (2a + 2b)	
3	Participant Reimbursement for Transportation/Ancillary	
3a	50 Percent Federal	
3b	50 Percent County	
3c	<u>Subtotal</u> for Transportation/Ancillary (3a + 3b)	
4	Participant Reimbursement for Dependent Care	
4a	50 Percent Federal	
4b	50 Percent County	
4c	<u>Subtotal</u> for Dependent Care (4a + 4b)	
5	Grand Total of Planned Cost (1+2c+3c+4c) Must agree with Table 1's Grand Total Cost	

## **Policy Guidelines for Counties Offering a CalFresh Employment and Training Program**

### **INTRODUCTION**

This document has been prepared by the California Department of Social Services (CDSS) to provide counties with policy guidelines and program definitions for the CalFresh Employment and Training (E&T) program. These guidelines may serve as a helpful tool for counties as they administer E&T and prepare E&T plans. Counties are encouraged to read this document prior to preparing their E&T plan for Federal Fiscal Year (FFY) 2015.

Counties are advised to review All County Letters (ACLs) 12-03 and 13-107 which defines changes to E&T adopted with the passage of Senate Bill (SB) 43 and SB 134. CDSS also recommends that counties read All County Information Notice (ACIN) I-01-13 as it addresses questions related to work registration. Finally, counties with questions about the use of E&T funds not answered in this document may find the help they need within the federal E&T funding questions and answers transmitted via ACIN I-50-07, dated September 28, 2007.

Questions not addressed in these guidelines may be directed to Robert Nevins with the CalFresh branch either by telephone at (916) 654-1408 or via e-mail at [Robert.Nevins@dss.ca.gov](mailto:Robert.Nevins@dss.ca.gov).

### **PART I THE E&T PLAN**

#### **A. Plan Submission and Modifications**

Counties who wish to participate in the E&T program must submit a CalFresh E&T plan. The plan contains a narrative description of the county's E&T program and include financial estimates both for the costs of administering the program and for participant reimbursements. Each year, CDSS issues an updated template for use by counties in preparing their plans. Counties receive a Microsoft Word copy of the template which helps expedite the process for plan preparation and review. Data from individual county plans is consolidated into a state plan which is submitted to the Food and Nutrition Service (FNS) by August 15 prior to the beginning of the FFY.

When a county proposes to make any substantive change to its E&T program after its E&T plan is approved, the county shall submit a plan modification to CDSS. The modification request must be approved by CDSS and FNS before the proposed change(s) may be implemented. The county may be liable for costs associated with the implementation of any change that occurs prior to approval by FNS and CDSS. The following are examples of changes that require a formal modification of the county E&T plan:

- Major changes to the design of the E&T program such as the addition or removal of an E&T component, the alteration of participation requirements, or the inclusion of new services for which E&T participants will be reimbursed;
- Significant increases in E&T administrative expenditures and/or costs for participant reimbursement;
- Termination, addition, or modification of primary contractual agreements; or
- Implementation of a pilot project or third party match model.

When submitting an amended plan, counties must edit the original plan and re-submit it as a Microsoft Word document. A cover letter must be attached describing the proposed change(s). Counties must be careful to ensure that appropriate amendments are made to all parts of the plan impacted by the programmatic or budgetary amendments. The county may want to contact CDSS for assistance in determining those sections within its E&T plan that will be affected by the proposed modification. E&T plan revisions should be submitted to CDSS in a timely manner in order for CDSS to acquire federal approval if needed and make any necessary adjustments to the state E&T plan

#### B. Maintaining a Cohesive E&T Program

All entities involved in the preparation of the E&T plan and administration of the program are encouraged to hold regular meetings to ensure that all aspects of the county's E&T program, including the written plan, are consistent with CDSS policies and procedures. Such meetings will foster a more cohesive approach to E&T administration and allow affected policy and fiscal units to share their expertise when addressing outstanding issues. Affected entities include those that have responsibility for the following functions:

- Preparing the E&T plan;
- Negotiating and overseeing contractual agreements;
- Developing the E&T budget;
- Managing E&T cases and monitoring program participation;
- Submitting E&T financial claims; and
- Compiling data for the Stat 47 & 48 reports.

### PART II E&T FUNDING

Note: Much of the information contained in this section was taken from the federal E&T toolkit which was released by FNS in Administrative Notice 11-16.

#### A. Overview of the E&T Funding Process

Each state receives an annual 100 percent federal allocation to administer its E&T program. In California, this allocation is distributed among those counties that have chosen to participate in E&T based on their average monthly caseload. Counties who wish to spend additional dollars administering their E&T program can receive federal

reimbursement for 50 percent of their approved administrative costs. The FNS also reimburses 50 percent of allowable expenditures for participant reimbursements including transportation, dependent care, and allowable ancillary expenditures.

Financial information is reported on a county expense claim and includes claims for the 100 percent federal grant, and 50 percent federal reimbursements for program administration and allowable products and services provided to participants. The claim is due 30 days after the end of each federal fiscal quarter. Counties complete financial tables within their E&T plan which break out their proposed budget based on the cost of each component and based on the amount of federal and county dollars that will be spent on E&T administration and on participant reimbursements.

#### B. Allowable Administrative Costs

Allowable administrative costs are operational costs for E&T, which include all administrative expenses that are reasonable and necessary to operate an approved E&T program. Allowable administrative expenses include:

- Salaries and benefits of personnel involved in administering E&T (see below);
- Office equipment, supplies, postage, duplication costs and travel that is necessary to carry out the program's objectives;
- Development and production of E&T materials when no other appropriate materials exist;
- Lease or rental costs;
- Maintenance expenses;
- Other indirect costs; and
- Charges for travel for the purpose of fulfilling the approved plan based on official State, local or university travel regulations.

#### C. Participant Reimbursements

The county welfare department (CWD) is responsible for reimbursing participants for expenses that are reasonable, necessary, and directly related to participation in the E&T program. Participant reimbursements must not be made with 100 percent federal grant or 50 percent matched administrative cost funding. Costs for which participants may be reimbursed include, but are not limited to the following:

- Transportation in the form of bus tickets, monthly bus passes, or gas vouchers;
- Dependent care;
- Work clothing and uniforms;
- Books and school supplies;
- Tuition for classes that are part of an E&T education component (subject to CDSS approval);
- Tools and other necessary equipment;
- Minor vision correction (such as eyeglasses, bifocals, eye exam);
- Basic dental work (such as teeth cleaning);



- Minor automobile repairs;
- Legal services;
- Test fees;
- Union dues;
- Licensing and bonding fees;
- Housing stabilization services limited to no more than two months per participant during the FFY subject to CDSS approval.

Participant expenses for transportation and costs other than dependent care are reimbursed by the CWD with 50 percent federal cost sharing up to the actual cost of the participant expenses or the CWD maximum reimbursement rate, whichever is lowest. It is essential that counties ensure participants are sufficiently reimbursed for transportation to travel both to and from their E&T assignment. County budgets and procedures must be regularly updated to reflect current costs of bus tickets, bus passes, and gasoline prices when participants are reimbursed with gas vouchers.

Monthly expenditures for dependent care are reimbursed by the CWD, with 50 percent federal cost sharing, up to the actual cost of the dependent care for each dependent or the regional market ceiling for child care, whichever is lowest. Counties may find the regional market ceiling for their county at: <http://www3.cde.ca.gov/rcsccl/>. The provision of dependent care may be limited to specific components designed to serve families verses those which focus primarily on single adults. Participants receiving dependent care should be reimbursed for all dependents requiring care unless otherwise prohibited by this section.

A county may not provide a reimbursement for a dependent age 13 or older unless the dependent is physically and/or mentally incapable of caring for himself or herself or is under court supervision. For dependents age 13 or older, the county should obtain written verification if a claim of physical and/or mental incapacity or a court-imposed requirement for supervision of a dependent is questionable. A county may provide reimbursements above established dependent care limits, but such costs must be paid for with 100 percent county funds. Participants with monthly expenses that exceed the amounts and limits above may have good cause for not participating.

#### D. E&T Funding Limitations

The use of E&T administrative funds is limited to the cost of planning, implementing, and operating an E&T program in accordance with an approved plan. E&T administrative funds must not be used for any of the following activities or purchases:

- Determining whether an individual must be work registered;
- Screening during the certification process;
- Disqualification activity that takes place after noncompliance without good cause is reported;
- Subsidizing a participant's wages;

- Reimbursing participants for dependent care or transportation/ancillary costs (these E&T costs should be budgeted and claimed to the specific county expense claim code provided for these expenses);
- Goods and services for private use;
- Outstanding debts;
- Entertainment costs that are primarily for amusement or social activities; and
- Fines, legal fees, and penalties for failure to comply with federal, state, or local laws.

#### E. Reasonable and Necessary Costs

Costs that may be reimbursed with E&T dollars must be reasonable and necessary. The federal E&T toolkit defines a cost as reasonable if, in its nature and amount, it does not exceed that which a prudent person would pay under the circumstances prevailing at the time the decision was made to incur the cost. A reasonable cost provides a program benefit generally commensurate with the cost incurred, is proportionate to related program costs, and is within the scope of E&T.

Necessary costs are those priority expenditures incurred to carry out essential functions of E&T that cannot be avoided without adversely affecting program operation and that do not duplicate existing efforts.

#### F. Funding Requirements for E&T Education Components

Counties that choose to offer an E&T education component must ensure that the following requirements for the use of E&T funds will be met:

- Federal funds made available to operate an education component must not be used to supplant non-federal funds being used for existing services and activities. This prohibition applies to both federal 100 percent allocations and federal matching dollars. Federal funds may only be used to operate an approved education component to the extent that E&T component costs exceed the normal cost of services provided to students not participating in E&T.
- Costs not charged to the general public cannot be charged to the E&T program. Nor can these costs be used to draw down a federal 50 percent reimbursement for administration of an E&T education component.
- Federal funds can be used to pay for some education activities and support services offered through community colleges as long as these services are above and beyond those offered to non-E&T students or offered at cost. These activities and services must be described in the county's E&T plan and are subject to review and approval by FNS. Tuition, case management and other support services are allowable costs and can be paid for with federal and county dollars.
- All other sources of funding for education must be explored, including other educational grants such as the Pell grant but excluding student loans, before

E&T funds are used for tuition. The cost of tuition must be the same for E&T participants as it is for students not participating in E&T.

### G. E&T Partnerships

A county can establish a partnership with local agencies to provide E&T services, or to administer E&T components. In some instances, a county will reimburse a partner agency for all allowable administrative costs using 100 percent federal grant funds and in other cases, the partner agency will be reimbursed for half of its administrative expenditures using 50 percent federal cost sharing. In either case, the partner agency is able to access funds not previously at its disposal and the county is able to conserve limited resources while expanding available services to E&T participants. These arrangements are often called third-party reimbursement models.

Partnerships can vary in the scope of responsibility assumed by the partner agency(s). In a more restricted model, a partner agency would deliver the services of an E&T component, such as job club or vocational training and the county would retain responsibility for assessment, placement and tracking participation. In a more comprehensive model, the partner agency would assume responsibility for assessment, placement and tracking, as well as offering E&T activities and distributing participant reimbursements. The county would then reimburse the partner for allowable E&T expenses.

When creating a partnership, a county should first decide how much responsibility it wants to confer to a partner agency, including the services the agency will provide. Next, a county should select an appropriate partner agency or agencies to administer some or all of its E&T activities. Potential E&T partner agencies include Community-Based Organizations (CBOs), non-profit agencies, community colleges, vocational training centers, high school equivalency (GED) preparation centers, and local businesses. For a more comprehensive partnership, potential agencies should be assessed for their capacity to conduct assessments, track and report E&T participation, offer agreed upon E&T activities, submit accurate and timely invoices, and maintain financial records for review by CDSS upon request.

More detailed guidance for counties considering the use of partnerships in administering E&T is included in the federal E&T toolkit. Washington State maintains an effective E&T program through the use of partnerships and the toolkit summarizes a case study of Washington's third party design. This summary identifies five crucial questions a county should ask in assessing whether to partner with a given agency. It also contains a sample list of items to be addressed in a partnership agreement.

### PART III E&T COMPONENTS

An E&T program shall include one of the components listed below. Counties have the freedom to offer a single component, a sequence of components, or concurrent activities. Specific components can be established for various E&T target populations.

A county can offer components in which work registrants participate on a voluntary basis, or it can mandate participation of those work registrants who do not qualify for an E&T deferral. E&T deferrals, including those added by SB 43 and SB 134, are listed in Part VI. Within a single county, some components might be voluntary and others mandatory.

**Assessment** – A county must assess a client’s skill level, aptitude, interests and supportive service needs in order to determine what, if any, will be the most effective E&T component for that client. Assessment is not in itself an E&T component, but it is the first activity which should be performed in preparing an individual for E&T participation.

The design and extent of the assessment process will vary from county to county. Counties should clearly describe their assessment process in their E&T plan. Even though it is not a component, assessment is an allowable E&T expense. The cost of conducting an assessment should be included in the administrative budgets for the various components of the county’s E&T program.

An assessment can be conducted in a variety of ways. Counties could require individuals to complete a one or two page questionnaire regarding their work experience, educational achievements, goals, interests, and any barriers to employment; or a county may assign the client to a case worker who can assess the client in person. A county could also partner with other related programs/offices such as Workforce Investment Act (WIA) One-Stop Career Centers, or non-government agencies which can provide a more comprehensive assessment. Many local workforce investment boards have extensive resources that can assist counties in the assessment process.

The following is a list of skills/knowledge that could be examined during the assessment:

- Education, including literacy level;
- Communication skills, including English proficiency;
- Employment history, skills, abilities and interest; and
- Barriers to employment and steps necessary to overcome these barriers.

The Department of Labor offers online career resources and workforce information to job seekers, students, businesses, and workforce professionals. Counties may wish to refer participants to <http://www.careeronestop.org/> as part of the assessment process.

**Job Search** – In this component, participants make a pre-determined number of inquiries about employment opportunities to prospective employers over a specified period of time. The component may be designed so that the participant conducts his/her job search independently or within a group setting. Methods for monitoring participation in job search include written reports submitted by participants as well as random phone calls from county staff to employers listed on the participant’s job search worksheet. Some counties offer job search as a stand-alone activity while others

combine it with other E&T components, such as job club. Job search components should entail at least 12 contacts with employers per month for two months.

**Job Club** – This component enhances the participants' job readiness by providing instruction in job seeking techniques and increasing motivation and self-confidence. Participants receive training and assistance in preparing resumes, writing cover letters, filling out applications, conducting both face-to-face and telephone interviews, and in understanding employer expectations. Some counties offer job club as a stand-alone activity while others combine it with job search or other E&T components.

**Vocational Training** – This component is designed to improve the employability of E&T participants by providing training in a skill or trade that allows the participants to move directly into employment. Examples of providers of vocational training activities include CBOs, adult schools, community colleges, Private Industry Council programs, and Regional Occupational Programs.

**Education** – This component provides educational programs or activities to improve basic skills or otherwise improve employability. Such programs include Adult Basic Education (ABE, basic literacy, English as a Second Language (ESL), GED, and post-secondary education. A post-secondary education component is one whose purpose is academic and whose curriculum is designed primarily for students who are beyond the compulsory age for high school. Only those education components that establish a direct link to job readiness will be approved.

**Work Experience** – In this component, participants are placed in a non-salaried assignment where they acquire actual work experience and/or training. The goal of this experience is to enable participants to move into regular employment. In contrast to the workfare component, work experience placements can be with private, for-profit agencies. Work experience placements can also include unpaid internships that are a part of non-graduate school curriculum.

Work experience assignments cannot replace or prevent the employment of regular employees and such assignments must provide the same benefits and working conditions provided to paid employees performing comparable work for comparable hours.

**Workfare** – In this component, participants perform non-salaried community service in a public service capacity. Workfare positions are established with public and private non-profit organizations such as government offices, libraries, and college campuses. Participants perform such tasks as office work, roadside cleanup, and grounds maintenance.

The primary goal of workfare is to improve employability and encourage individuals to move into regular employment while returning something of value to the community. As part of the workfare component, the CWD may establish a job search period of up to 30 days prior to sending the registrant to a workfare site. Workfare assignments cannot

replace or prevent the employment of regular employees and such assignments must provide the same benefits and working conditions provided to paid employees performing comparable work for comparable hours.

**Self-Initiated Workfare** – This component is comparable to regular workfare except that participants locate their own workfare placements with public or private non-profit organizations. This is a voluntary component and CalFresh sanctions are not imposed for failure to participate. Some counties provide participants with a list of CBOs from which to locate their assignments. Participants are responsible for arranging to have their participation verified and reported to their case workers.

**Job Retention** – counties are authorized to provide job retention services for up to 90 days to those individuals who secure employment, provided they have received other employment/training services as part of E&T. Costs for which participants may be reimbursed include transportation, child care, equipment, tools and clothing required for the job, test fees, union dues, relocation expenses, and licensing and bonding fees.

Counties that opt to provide job retention services must include in their E&T plan a description of the retention services they plan to provide, the length of time they plan to provide them, to whom they plan to provide them, and the cost for providing these services. Counties should complete a component summary for job retention in Part II of their E&T plan and include job retention costs on Table 1.

Counties may use their 100 percent federal allocation as well as 50 percent federal/50 percent county dollars for administration of tasks associated with the provision of job retention services. Allowable participant reimbursements for job retention must be funded with federal and county matching dollars. Federal funds may only be used to provide job retention services if such services are approved by CDSS.

**Anti-Substance Abuse and Mental Health Improvement Services** – The E&T toolkit specifies that generalized anti-drug, anti-alcohol and mental health improvement discussions are permissible as part of an approved E&T program. However, an E&T component should not be the forum for support groups, referrals and treatment planning and implementation, but may only be used for general discussions and the distribution of brochures and other materials. These activities do not constitute a component, but may be offered as part of one of the primary components listed in this section.

Hours devoted to anti-substance abuse and mental health improvement discussions should not exceed those dedicated to other aspects of the component that do not deal directly with its main thrust. For example, if a job club component addresses such topics as effective job search, resume writing, interviewing, dress and hygiene, anti-substance abuse or mental health improvement discussion should take up no more time – and probably significantly less – than the other activities. In a job search component requiring 20 hours of participation per week, substance abuse discussion and the dissemination of information must be less than ten hours per week.

In order to qualify for E&T program reimbursement, general anti-substance abuse and mental health improvement services must:

- Be reasonably necessary and directly related to E&T program component participation;
- Not be considered “medical” (i.e., a course of treatment provided by licensed physicians or psychologists); and
- Not be available through another government program or available at no cost to the participant through a private source such as a charitable organization.

Anti-substance abuse treatment, defined as behavior modification therapy for those who use drugs or alcohol to the detriment of themselves and others is not a reimbursable E&T activity. CalFresh applicants and recipients regularly undergoing such treatment are exempt from work registration requirements per Manual of Policies and Procedures (MPP) Section 63-407.21(f). Persons in need of mental health services would either be exempt from work registration requirements as mentally unfit for employment per MPP Section 63-407.21(b), or deferred based on temporary illness per MPP Section 63-407.811(c)(8). Therefore, anti-substance abuse or mental health treatment are not necessary participant costs and may not be funded with E&T dollars.

#### PART IV MANDATORY PARTICIPANTS, VOLUNTEERS, AND COUNTY TARGET POPULATIONS

##### A. Deferrals and Mandatory Participants

Within the work registrant population, certain persons are temporarily excused or “deferred” from participation for reasons that include those listed at MPP Section 63-407.811 and those adopted by SB 43 and SB 134. Deferrals are listed in Part VI. Counties can create additional deferrals beyond those in E&T regulations such as a deferral based on homelessness. Work registrants who are not deferred are defined as mandatory E&T participants. However, a county is not required to serve all mandatory participants.

##### B. Target Populations

Counties have the freedom to target specific groups within their pool of mandatory participants and to limit the provision of E&T services to these persons. Counties can also decide how many persons they will serve within their target populations. For example, a county could limit the number of persons it will serve based on existing resources and financial capacity. Mandatory participants not part of the target population are not obligated to participate in E&T. Persons targeted to receive E&T services must only participate if assigned by the county.

Examples of E&T target populations include, but are not limited to, CalFresh work registrants who are also recipients of General Assistance (GA), participants in various E&T pilot projects, persons living in a particular geographic area within the county,

individuals in need of adult basic education or training in ESL classes, or employable Able-Bodied Adults without Dependents (ABAWDs). Currently, the most frequently targeted population consists of those receiving both CalFresh and GA who are required to participate in GA employment and training activities. Targeting GA recipients as E&T participants provides a vehicle by which counties can use E&T dollars to pay for the costs of running their GA work components since these components are also E&T components.

A county can have more than one target population and establish specific components for specific target groups. For example, one county might assign its GA population to CalFresh/GA job search and job club components and establish a work experience pilot project for CalFresh recipients living in a designated urban neighborhood. Another county might target work registrants with limited English proficiency, irrespective of their receipt of GA, and assign such persons to basic education and ESL. Still another county might place a small number of employable work registrants in an intense multi-faceted training program delivered by a variety of organizations and assign less employable GA recipients between age 18 and 30 to job club and workfare.

### C. Volunteers

Counties may choose to operate E&T components in which work registrants elect to participate on a voluntary basis. All or part of a county's E&T program may be designed to serve voluntary work registrants. Persons who volunteer to participate in an E&T component must not be sanctioned for failure to comply with the requirements of that component. However, if a voluntary participant repeatedly fails to comply with an E&T component, the county should discontinue participant reimbursements and is not obligated to serve the individual.

## PART V WORK REGISTRATION AND ABAWD POPULATIONS

### A. Preparing Accurate Estimates

As part of their E&T plan, counties must include estimates of the number of work registrants and ABAWDs expected to be in the county during the relevant fiscal year. In developing their estimates of work registrants and ABAWDs, it is essential that counties have an accurate understanding of those CalFresh recipients who should be included in these populations.

Counties should remember the following in preparing their plan estimates:

- The work registrant population is the largest population captured in the plan.
- The ABAWD population is a subset of the work registrant population. ABAWDs and work registrants are not distinct unrelated groups, but the ABAWD population is a smaller population within the work registrant population.



- There are always fewer ABAWDs in the county than there are work registrants because additional exemptions have been established for the ABAWD work requirement, which are not included in the list of work registration exemptions.

Once a county has estimated the size of its work registration population, it should use this population as its base for determining estimates for the number of ABAWDs in the county. The county should estimate the number of work registrants who qualify for the ABAWD exemptions based on age, pregnancy, and living in a CalFresh household with a child under age 18. These persons would be deducted from the work registrant count and the remaining work registrants would represent the county's ABAWD population.

Persons who do not qualify for an ABAWD exemption are counted as ABAWDs even if they reside in a county with an ABAWD waiver, or are granted the 15 percent ABAWD exemption. Such persons are not considered exempt from the ABAWD work requirement. California will be seeking federal approval to extend the existing statewide ABAWD waiver through FFY 2015. It appears that California is eligible for a waiver based on a high unemployment rate.

#### B. Relationship of the E&T Plan to the STAT 47 and STAT 48 Reports

The quarterly STAT 47 and annual STAT 48 data reports are compiled to provide FNS with work registrant and E&T participation data for the Federal Fiscal Year. The data from these reports provides counties with a starting point in developing work registrant and ABAWD estimates for inclusion in their E&T plan. If numbers contained on the STAT forms appear problematic, counties may be forced to use other sources such as county adhoc reports and manual counts to ensure that estimates included in the E&T plan are reasonable.

Counties are reminded that the estimates of work registrants and ABAWDs contained in the E&T plan should be based on unduplicated counts. Currently, the ABAWD count on the STAT 47 is a duplicated count, but CDSS is in the process of revising the form so that the numbers for work registrants and ABAWDs are both unduplicated. Counties will be informed when these revisions have been completed.

The STAT 47 report is due 15 business days after each fiscal quarter ends, and the STAT 48 report is due on November 15<sup>th</sup> of each year. Data from these reports is compiled by CDSS and transmitted to FNS using the FNS 583 E&T Program Activity Report. The FNS utilizes the number of work registrants identified on the 583 report as the primary source for determining the annual amount of E&T funds allotted to each state. Thus, it is essential that counties periodically review the STAT 47 and 48 reports to ensure that work registrant numbers appear reasonable when compared with the size and demographics of the non-assistance CalFresh population. Inappropriately small work registrant counts will lead to a reduction in the size of California's 100 percent E&T federal grant.

#### PART VI PROGRAM DEFINITIONS

The following definitions are included to assist counties in acquiring an accurate understanding of both E&T participation rules and the terms so frequently used when discussing E&T policies and plan requirements.

**ABAWD** – An ABAWD is a non-assistance CalFresh recipient age 18 to 49 who does not qualify for one of the ABAWD exemptions listed in MPP Section 63-410.31 or .32 (see list below). CalFresh eligibility for ABAWDs is limited to any three months in a 36-month period (a three month time limit) unless the individual meets the ABAWD work requirement, qualifies for an exemption, lives in a county with an ABAWD waiver, or is granted the 15 percent ABAWD exemption described below.

**ABAWD Exemptions** – Persons are exempt from the ABAWD work requirement if they qualify for one of the CalFresh work registration exemptions at MPP Section 63-407.21 (see list of work registration exemptions below). Individuals are also exempt from the work requirement if they are:

- Under age 18 or over age 49;
- Residing in a CalFresh household that includes a child under 18 years of age; or
- Pregnant

**ABAWD 15 percent Exemption** – The 15 percent exemption is a temporary exemption that counties may grant to persons who are unable to satisfy the ABAWD work requirement due to circumstances beyond their control. California Department of Social Services allocates 15 percent exemption months that counties may apply to ABAWDs.

Criteria for the 15 percent exemption are developed by counties and include such things as illiteracy, family crisis that interrupts E&T participation or causes a temporary reduction in hours worked, social and emotional barriers, remoteness, temporary homelessness, lack of adequate transportation, domestic violence, recent release from a drug or alcohol treatment program, working 10 to 19 hours per week and unable to meet the 20-hour work requirement, and other reasons determined on a case-by-case basis. Unlike those granted one of the ABAWD exemptions listed above, persons granted the 15 percent exemption are still considered ABAWDs and are counted as such for purposes of quarterly reports and estimated ABAWD counts in the E&T plan.

**ABAWD Waiver** – The FNS may approve a waiver of the ABAWD work requirement for areas within a state that meet federally-established waiver criteria. Waiver approval criteria include designation as a Labor Surplus Area (LSA) by the U.S. Department of Labor (DOL), having a recent unemployment rate above ten percent, having a 24 month average unemployment rate that is 20 percent above the national average for the same period, or a determination by the DOL's Unemployment Insurance Service that an area qualifies for Extended Benefits (EB). For FFY 2014, the entire State of California is under a waiver of the ABAWD work rule.

**ABAWD Work Requirement** – The ABAWD work requirement is satisfied by performing one of the following activities:

- Working 20 or more hours a week, averaged monthly.
- Participating in a workfare or work experience program.
- Participating in an allowable work activity for 20 or more hours a week. For purposes of the ABAWD work requirement, a work activity means one of the following:
  - A program under the WIA.
  - A program under Section 236 of the Trade Act of 1974. The Trade Act applies to workers identified by the Employment Development Department (EDD) as adversely affected by the U.S. trade agreements, e.g., the North American Free Trade Act. The Trade Act provides training services to adversely affected workers through participation in programs that are subject to approval by the Secretary of the U.S. Department of Labor. These programs include job search, job club, on-the-job training, WIA training, or a program of remedial education.
  - An employment and training program, including the CalFresh E&T Program. E&T stand-alone job club and job search components do not satisfy the ABAWD work requirement.

ABAWDs may not receive CalFresh for more than three months within a 36-month period unless they meet the above work requirement, qualify for an ABAWD exemption, reside in a county where the work requirement is waived, or are granted the 15 percent exemption.

Persons who fail to meet the ABAWD work requirement may regain eligibility if, during a 30-day period, they work, or participate in an allowable work activity for 80 hours, or participate in workfare for the required number of hours. Persons who regain eligibility and stop meeting the ABAWD requirement for reasons such as layoff may receive CalFresh for three consecutive months. The three consecutive months are available only once during a 36-month period.

**Assessment** – An in-depth evaluation of employability skills often coupled with counseling on how and where to search for employment. The assessment helps the county determine which component, if any, a mandatory participant or volunteer should be assigned to.

**Contractor** – Any public or private entity that is providing E&T services under a financial or non-financial agreement with the county agency.

**Deferred** – this term refers to a work-registered person or persons temporarily excused by the county from mandatory participation in the E&T program. A list of deferrals is contained in MPP Section 63-407.811 and includes lack of transportation, lack of dependent care, living an unreasonable distance from the E&T component site, family

crisis, and temporary illness which includes pregnancy. Counties can also establish their own deferrals.

SB 43 and SB 134 added new deferral criteria to which all E&T counties must adhere, irrespective of their existing deferral policies. These deferrals are defined in Welfare and Institutions Code (WIC) Section 18926.5 and ACLs 12-03 and 13-107. WIC Section 18926.5 requires deferral of those work registrants who are:

- Under 18 years of age or 50 years of age or over;
- Living in a CalFresh household with a child under the age of 18, regardless of whether or not the child is receiving, or is eligible to receive, CalFresh benefits;
- Living in a federally determined work surplus area; or
- A veteran who have been honorably discharged from the United States Armed Forces.

**CalFresh Employment and Training Program** – A county-administered program designed to assist CalFresh recipients increase their employability and self-sufficiency through participation in program components which include job search, job club, workfare, work experience, education, and/or vocational training.

**E&T Component** – A service, activity, or program which is designed to help CalFresh recipients gain skill, training, or work experience that will increase their ability to obtain regular employment and achieve self-sufficiency. See Part III for a description of E&T components.

**E&T Participation Requirements** – Federal legislation and regulations contain the following minimum and maximum participation requirements for the E&T program.

Hours of participation in a workfare, self-initiated workfare, or work experience component are limited to the number obtained by dividing the household's monthly CalFresh allotment by the higher of the applicable federal or state minimum wage. The minimum wage in California is currently \$8.00 per hour and the federal minimum wage is \$7.25. The California state minimum wage will increase to \$9.00 effective July 1, 2014. Persons who voluntarily participate in E&T may choose to participate for additional hours beyond the minimum wage calculation.

Hours of participation in job search job club, education, or vocational training can range from 12 to 120 per month. CDSS may approve a component requiring less than 12 hours per month if it advances the purpose of the E&T program namely, to improve employability and increase self-sufficiency.

The maximum number of hours that can be required of a mandatory E&T participant is 30 per week or 120 per month. The county cannot mandate more than 120 hours per month, but individuals can choose to participate for an unlimited amount of additional hours.

**Mandatory Participant** – A CalFresh applicant or recipient who is neither exempt from CalFresh work registration, nor deferred from participation in E&T. Typically, a county does not assign all mandatory participants to an E&T activity either because some participants are not targeted by the county to receive E&T services, or because available E&T funds are insufficient to serve all participants.

**Non-ABAWD** – A work registrant that qualifies for one of the ABAWD exemptions at MPP Section 63-410.32, namely, under age 18 or over age 49, pregnant, or residing in a CalFresh household with a child under the age of 18.

**Qualifying ABAWD Activity** – An activity that satisfies the ABAWD work requirement. Qualifying activities consist of workfare (including the 30-day job search activity that can be assigned prior to workfare, self-initiated workfare, work experience, vocational training, and education. Stand-alone E&T job search or job club components are not qualifying activities for ABAWDs. However, hours spent in job search or job club may be combined with vocational training or education activities to meet the 20-hour weekly ABAWD requirement provided time spent in job search or job club comprises less than half of the total hours spent in the components.

**Screening** – An evaluation by the county as to whether a CalFresh applicant or recipient should be deferred from E&T or assessed for E&T participation. E&T funds may not be used to pay for the cost of screening.

**Volunteer** – A CalFresh recipient who voluntarily participates in E&T. Volunteers can include both CalFresh work registrants and persons exempt from CalFresh work registration. Volunteers are not subject to sanctions for failure to comply with E&T requirements.

**Workforce Development System** – An interconnected strategy for providing comprehensive labor market and occupational information to job seekers, employers, providers of one-stop delivery of core services, providers of other workforce employment activities, and providers of workforce education activities. To the maximum extent possible, counties should utilize their workforce development system to serve E&T participants.

**Work Registrant** – A non-assistance CalFresh applicant or recipient who does not meet one of the work registration exemptions at MPP Section 63-407.21. Work registrants are subject to CalFresh work registration requirements at MPP Section 63-407.4. Work registrant requirements and exemptions are listed below.

**Work Registration Exemptions** – In accordance with MPP Section 63-407.21, an individual is exempt from work registration if he/she is:

- Younger than 16 years of age or 60 years of age or older;
- 16 or 17 years of age who is not the head of the household, or who is attending school or enrolled in an employment training program at least half time;

- Physically or mentally unfit for employment;
- Complying with CalWORKs Welfare-To-Work requirements;
- Caring for a dependent child under age six or an incapacitated person;
- Receiving or has applied for unemployment insurance benefits;
- Participating in a drug or alcohol treatment program that prohibits employment of 30 hours or more per week;
- Employed or self-employed at least 30 hours per week or receiving weekly earnings at least equal to the federal minimum wage multiplied by 30 hours;
- Attending school on at least a half-time basis.

**Work Registrant Requirements** – As a condition of CalFresh eligibility, every Non-Assistance CalFresh applicant and recipient between the ages of 15 and 60 who does not qualify for a work registration exemption must comply with the following requirements:

- Register for work or be registered by the county (see policies released in ACIN I-01-13);
- Participate in the E&T program if assigned by the county;
- Provide sufficient information upon request to determine employment status or availability for work;
- Report to an employer when referred by the county or its designee;
- Accept a bona fide offer of suitable employment; and
- Not voluntarily quit a job of 30 or more hours a week or reduce work hours to fewer than 30 hours a week without good cause.