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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

September 2, 2008

ALL COUNTY INFORMATION NOTICE NO. I-63-08

TO: ALL COUNTY WELFARE DIRECTORS
ALL COUNTY FOOD STAMP COORDINATORS
ALL FOOD STAMP EMPLOYMENT AND TRAINING COORDINATORS

SUBJECT: FEDERAL FISCAL YEAR 2009 PLAN HANDBOOK AND TEMPLATE FOR COUNTIES PARTICIPATING IN THE FOOD STAMP EMPLOYMENT AND TRAINING PROGRAM

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

This letter transmits the Federal Fiscal Year (FFY) 2009 county plan handbook and template and 100 percent fund allocation for the Food Stamp Employment and Training (FSET) program. For FFY 2009, California has been granted a federal FSET allocation of \$7,398,722 which includes \$808,000 that will be used to cover state administrative costs and to provide workers' compensation coverage for FSET participants. Twenty-four counties have indicated their intent to operate an FSET program in FFY 2009. FSET funds have been allocated among these twenty-four counties based on their average monthly caseload. Please refer to the attached list, which shows the distribution of the 100 percent federal FSET funds among the participating counties.

If the cost of a county's FSET program exceeds its 100 percent federal allocation, costs for operating FSET components will be split at a 50-percent federal and 50-percent county ratio. Participant expenses for transportation and ancillary costs are reimbursed by the county with 50 percent federal cost sharing. Counties are reminded that 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.

As required by the Federal Food and Nutrition Service (FNS) and pursuant to the State's Manual of Policies and Procedures (MPP) section 63-407.842, counties must submit an FSET plan containing component activity, projected recipient participation levels, program budget, and work registrant and ABAWD population data for inclusion in California's statewide FSET plan. The FSET handbook consists of instructions for completing the plan and program definitions to assist counties with this task. It is recommended that county staff review the FSET handbook, including the program definitions, prior to, or concurrent with the completion of their FSET plans.

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The FSET template and handbook for FFY 2009 has been revised, shortened, and simplified. Counties should complete each section of the FSET plan template. If certain optional provisions of the FSET plan, such as county contract requirements are not relevant to the county's FSET program, counties should note that these provisions are not applicable. Counties are reminded to use the current FSET template in submitting their plans to CDSS as this will expedite the county plan review process and reduce our potential for error in compiling county data.

It is important that counties provide reasonably accurate estimates of their work registrant and Able-Bodied Adults Without Dependent (ABAWD) populations for FFY 2009. Counties should develop these estimates using the data from their most recent statistical reports:

- The Annual Work Registrant and Food Stamp Employment and Training (FSET) Program Caseload Report (STAT 48);
- The Food Stamp Program Work Registrant, Able-Bodied Adults Without Dependents and Food Stamp Employment and Training (FSET) Program Caseload Report (STAT 47).

Counties are reminded that FNS utilizes the data from the STAT 47 and 48 forms to determine each state's future allocation of FSET funds and the 15 percent ABAWD exemptions. Therefore, it is important that counties report data on the STAT 47 and 48 reports in an accurate and timely fashion.

Food, Conservation, and Energy Act of 2008 (Farm Bill) - Changes to the FSET Program:

- Section 4122 provides that "the Secretary shall reserve for allocation to State agencies, to remain available for 15 months, from funds made available each fiscal year ..." An FNS "Farm Bill Question and Answer" dated August 1, 2008, provides the following clarification regarding this provision:

Does this provision affect the requirement to spend reallocated funds in the same federal fiscal year in which they were allocated?

Answer: No. The change doesn't directly affect State agencies. For FNS, it means unspent carryover funding "goes away" after 15 months and will no longer remain available until it's expended. This takes away some flexibility to reallocate funds and could mean that we can no longer continue to ensure that State agencies will receive no more than a 20 percent decrease in their 100 percent Federal E & T grants from one year to the next.

Does this provision allow State agencies 15 months instead of 12 months to spend their annual 100 percent Federal E&T grants?

Answer: No. State agencies continue to have 12 months. FNS has 3 additional months to reallocate unexpended funds to other States. Reallocated funds must be obligated by the first quarter of each fiscal year. Counties should ensure that expeditious use is made of the county's federal 100 percent funds and that expenditure claims are submitted in a timely fashion to avoid a loss of funds and reduction in services to FSET participants.

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- Section 4108 authorizes states (counties) to include the provision of job retention services for up to 90 days for FSET participants who gain employment. Counties that opt to provide job retention services in FFY 2009 must record this as a program change in their plan and include a detailed description of the retention services. The description must identify the type, length, estimated cost, and portion of the food stamp population targeted to receive these services. Counties may use their 100 percent federal allocation as well as 50 percent federal/50 percent county dollars to administer approved job retention services. Costs of participant reimbursement for transportation and ancillary expenses that are reasonably necessary and directly related to job retention services will be matched with 50 percent federal dollars.
- Section 4108 also removes the 30 hour per week FSET participation limit for those who volunteer to participate in an FSET component. Hours of participation for volunteers in workfare, work experience, or on-the-job training are also not limited by the minimum wage calculation.

A Microsoft Word version of the FSET plan template will be e-mailed to counties immediately following issuance of this ACIN. Counties offering an FSET program should inform CDSS within one week of the issuance of this ACIN if they did not receive a Microsoft Word copy of the plan template. Those counties that did not receive an e-mailed copy of the template should e-mail updated contact information to CDSS including the name, title, address, fax, telephone, and e-mail address of the individual who will be responsible for preparing the FSET plan. Please alert Robert Nevins of the Food Stamp Branch as to whether your county receives a Microsoft Word version of the FSET template. Robert can be reached at the telephone number or e-mail address listed below.

The deadline for submitting your county's FSET Plan is October 1, 2008.

Please forward an electronic copy in Microsoft Word and mail a signed hard copy to:

ATTN: Mr. Robert Nevins, Food Stamp Analyst
California Department of Social Services
Food Stamp Branch
744 P Street, M.S. 16-32
Sacramento, CA 95814

E-mail: robert.nevins@dss.ca.gov
Fax: (916) 657-1295

If you have questions regarding the Food Stamp Work Registrant, ABAWD, and FSET Program Caseload Reports, STAT 47 and STAT 48, please contact Sharon Shinpaugh of the Data Systems and Survey Design Bureau at (916) 928-7927. If you have any questions about this letter, or the submission of your plan, please contact Robert Nevins, Food Stamps FSET Analyst, at (916) 654-1408 or Randy Shiroi, Manager at (916) 654-1435.

Sincerely,

Original Document Signed By:

YVONNE LEE, Acting Chief
Food Stamp Branch

County	Average Monthly Caseload Calendar Year 2007	% to Total	FSET 100 % Federal Grant Allocation \$6,590,722
ALAMEDA	20,958	4.51%	\$297,133
HUMBOLDT	3,676	0.79%	\$52,109
KERN	22,882	4.92%	\$324,406
LOS ANGELES	197,879	42.57%	\$2,805,391
MARIN	2,025	0.44%	\$28,706
MENDOCINO	2,995	0.64%	\$42,464
MONTEREY	5,839	1.26%	\$82,784
ORANGE	22,396	4.82%	\$317,517
RIVERSIDE	19,707	4.24%	\$279,386
SACRAMENTO	29,659	6.38%	\$420,490
SAN BERNARDINO	33,061	7.11%	\$468,710
SAN DIEGO	20,530	4.42%	\$291,067
SAN FRANCISCO	15,970	3.44%	\$226,417
SAN JOAQUIN	14,889	3.20%	\$211,083
SAN LUIS OBISPO	2,696	0.58%	\$38,222
SAN MATEO	2,554	0.55%	\$36,214
SANTA BARBARA	4,265	0.92%	\$60,468
SANTA CLARA	16,882	3.63%	\$239,337
SANTA CRUZ	4,135	0.89%	\$58,622
SHASTA	4,530	0.97%	\$64,226
SONOMA	4,869	1.05%	\$69,025
TRINITY	332	0.07%	\$4,706
VENTURA	9,404	2.02%	\$133,318
YOLO	2,745	0.59%	\$38,922
TOTALS	464,877	100.00%	\$6,590,722

**FOOD STAMP EMPLOYMENT AND TRAINING (FSET)
PROGRAM HANDBOOK FOR FEDERAL FISCAL YEAR 2009**

**GUIDELINES FOR PREPARING COUNTY FSET PLANS
(October 1, 2008 – September 30, 2009)**

**Prepared by the
California Department of Social Services
Food Stamp Branch**

Revised August 7, 2008

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INTRODUCTION

The purpose of this handbook is to provide instructions for preparing the county Food Stamp Employment and Training (FSET) plan for Federal Fiscal Year (FFY) 2009. The California Department of Social Services (CDSS) must submit an annual FSET plan to the Food and Nutrition Service (FNS) for review and approval. The State's FSET plan consists of a synopsis of all the individual county FSET plans. The county and state plans must adhere to federal Employment and Training (E&T) legislation contained in Section (6)(d) and (16)(h) of the Food Stamp Act, federal regulations in Division 7, Section 273.7 of the code of Federal Regulations (CFR), federal E&T guidelines revised in May of 2003, and federal FSET financial policy questions and answers released on May 23, 2006 by FNS' Program Development Division. The federal financial questions and answers were transmitted to counties via ACIN I-50-07 dated September 28, 2007. State approval of individual county plans and allocation of FSET funds will be contingent upon FNS' approval of the State's annual FSET plan.

Plan Preparation and Submission

- Counties participating in FSET must complete and submit an FSET plan to CDSS no later than **October 1, 2008**. Counties should complete all sections of the plan template. This handbook follows the FSET plan template and takes a step by step approach in identifying and explaining the information counties must include in their plans. A separate template for counties not offering an FSET program was issued in ACIN I-33-08.

FSET Fund Limitations

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

- Determining whether an individual must be work registered;
- The work registration process;
- Screening during the certification process;
- Disqualification activity that takes place after noncompliance without good cause is reported;
- Subsidizing a participant's wages; and
- Reimbursing participants for dependent care or transportation/ancillary costs (these FSET costs should be budgeted and claimed to the specific county expense claim code provided for these expenses).

FSET Plan Modifications

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

- Major change in components (e.g., adding, deleting, or modifying a component);
- Significant change in the amount of expenditures expected to exceed the county's 100 percent FSET grant level for which the county will request 50 percent federal reimbursement;
- Change in the method of paying participant reimbursement.

If a plan is modified, the original plan must be edited and submitted in its entirety. A cover letter must be sent describing the proposed change(s). The pages within the plan that have been edited should be identified along with any tables that have been revised. Counties must be careful to ensure that appropriate amendments are made to all parts of the plan impacted by the proposed change. The county may want to contact CDSS for assistance in determining the affected sections.

Some changes to the county FSET plan do not require approval by CDSS. These changes include the following:

- Substitution of one contractor for another that does not affect the scope or operation of a component, or

A change in the targeted population of a component (e.g., from ABAWDs to recipients of General Assistance) that does not affect the participation levels or component cost.

Although CDSS approval is not required for these changes, counties should notify CDSS of the revisions being made using the same approach described above. FSET plan revisions should be reported to CDSS in a timely manner in order for CDSS to maintain accurate records.

PLAN PART I

SUMMARY OF COUNTY FOOD STAMP EMPLOYMENT AND TRAINING PROGRAM

Part I A. Abstract of the County FSET Program

Provide a narrative summary of the FSET program that the County Welfare Department (CWD) plans to implement and include the following information:

- 1. Program Changes** - Describe the nature of changes, if any, being made to the FSET program.
- 2. Program Components** - To receive approval, FSET program components must enhance the employability of individual food stamp recipients. Components may also be offered in combination such as Workfare and Job Search. Refer to the Definitions section for a brief description of FSET components.

Simply list the components that will be included in the county's FSET program. A detailed description of the component should be provided in Part I.B

- 3. Sequencing of Components** - If it is intended that a person will be placed in more than one component over the course of the FFY, describe the sequence in which the components will be assigned to the participant. If applicable, describe assignment of a participant to multiple components at the same time.
- 4. Other Employment Programs** - Identify other employment and training programs that serve Food Stamp, CalWORKs and General Assistance (GA) recipients. Explain any interface between these programs and FSET.
- 5. Workforce Development System** - Counties are encouraged to deliver their FSET components through the Workforce Investment Act (WIA), One-Stop System, unless their local One-Stop Center cannot provide the service or a One-Stop Center does not exist in the area. Explain how components will be delivered through the county's workforce development system. Describe the means by which the county will administer any components not delivered through the system.
- 6. Outcome Data** - Please forward with the county FSET plan:
 - any outcome data such as numbers of participants entering employment, types of employment found, wage rates, etc., collected by the CWD; and
 - Any evaluations or studies relating to employment and training conducted or commissioned by the county.

Plan Part I B. – Instructions for Completing the FSET Component Summaries template.

In completing this section, remember the following:

- Assessment by itself is not a component/activity.
- Screening is not a component/activity.
- The workfare component by itself satisfies the ABAWD work rule and hours of participation are determined by dividing the household's monthly food stamp allotment by the higher of the federal or state minimum wage.
- 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., Workfare (includes /30-day Job Search) and Alcohol and Drug Rehabilitation (AOD))
- If AOD and/or MH counseling is offered, this activity must be described in the component summary for the primary component with which it is combined. For example, if a participant is required to participate in vocational training and AOD counseling, the counseling activities must be included in the detailed narrative description for the vocational training component.
- ***If job retention services are included in the county's FSET program, a complete description of these services must be provided using a component template with corresponding cost entries included on Table 4.***
- If a county offers an FSET component not discussed in this handbook, a separate component template must be completed. **Note:** In order to qualify for federal funds, a full description of the component must be in the plan and it must adhere to all FSET requirements, including minimum and maximum participation requirements.

The following are instructions for completing each item of Part I B. FSET Component Summaries. There is also an example of a completed component summary at the end of this section.

- (1) Component name** - Provide the full name, including any acronyms and concurrent activities associated with the component.
- (2) Component type** - Designate each component offered as either a work or non-work component (see the Definitions Section for a description of work and non-work activities).
- (3) Component description** - Each component description must contain a minimum of the following:
 - a.** Describe in detail the activities that comprise the component. Include descriptions of supportive and enhanced ancillary services such as alcohol or drug (AOD) and mental health education and information. Include a description

(10) Anticipated number of participants reimbursed for dependent care:

- a. Enter the anticipated monthly number of participants to receive a dependent care reimbursement.
- b. Enter the yearly number of participants to be reimbursed. To obtain the yearly figure, multiply the number of persons to be reimbursed monthly by 12. The annual number of participants to be reimbursed must not be greater than the total number of component participants identified in (8 a.)
- c. Enter the estimated annual cost of dependent care for the component. Transfer this amount to the appropriate component line in Table 4 Column E.
- d. Average cost per participant for dependent care. This number is determined by dividing the annual cost of participant reimbursement by the yearly total of persons to be reimbursed.

(11) Anticipated number of participants to be reimbursed for transportation/ancillary expenses:

- a. Enter the anticipated monthly number of participants to receive a reimbursement for transportation and/or ancillary services.
- b. Enter the yearly number of participants to be reimbursed. To obtain the yearly figure, multiply the number of persons to be reimbursed monthly by 12. The annual number of participants to be reimbursed must not be greater than the total number of component participants identified in (8 a.)
- c. Enter the estimated annual transportation/ancillary cost for the component. Transfer this amount to the appropriate component line in Table 4 Column F.
- d. Average cost per participant for transportation/ancillary services.
This number is determined by dividing the annual cost of participant reimbursement by the yearly total of persons to be reimbursed.

Note: If this number is 0, the county must explain how participant transportation needs and expenses are addressed in Part IV, Section (2).

If ancillary expenses are provided for participants in a component please describe the reimbursable expenses:

(12) Total cost of the component including participant reimbursements

This is the sum of items (9), (10, and (11). Transfer this amount to the appropriate component line in Table 4 Column G.

EXAMPLE OF A COMPONENT SUMMARY

(1) **Component name:** Workfare/30-day Job Search

(2) **Component type:** Work

(3) **Component description:**

a. **Component Activities.** Describe the activities that comprise the component.

Workfare consists of job search followed by community service performed at a community-based organization, County Public Works, or other county government facility.

b. **Participation Requirements.** Identify the length of the component and the weekly/monthly participation requirements.

Following the initial determination of eligibility, participants are required to conduct up to 30 days of job search. Participants attend two days (six hours each day) of classroom instruction on job-search techniques, including interviewing, telephone technique, and preparation for interviewing and good work habits. The next five days are spent in a “phone room” arranging interviews with prospective employers. During the subsequent three weeks, participants must make five documented job contacts per day, reporting to a case manager every other week. Participants submit job search forms identifying employers contacted and participation is monitored via random phone calls. If a participant has not obtained employment at the end of the 30-day Job Search period, he/she is assigned to workfare for one month. Hours of workfare participation are determined by dividing the household’s monthly food stamp allotment by the state minimum wage of \$8.00 per hour.

If there are insufficient workfare slots for all ABAWDs, the county will provide a 15% exemption for those without an assigned placement. ABAWDs who complete two months of workfare will be rotated to a 15 exemption and those who were previously provided with the 15% exemption will be assigned to a workfare placement. To the extent feasible the workfare assignment and exemption rotation will be maintained to equitably distribute the available workfare placements and 15% exemptions.

c. **Organizational Responsibilities.** Explain how the component is administered and identify the entities involved in administering it.

The CWD’s Employment Services Division develops workfare component placements. Supervision of participants at the workfare sites is provided by the agency or organization receiving the participants’ services. The supervision costs are funded through interagency agreements and/or contracts.

(4) Geographic areas covered and variations among local areas:

County-wide

Other

(specify): _____

(5) Targeted populations Recipients of General Assistance.

(6) Anticipated number of ABAWD participants who will begin Workfare each month: 200

(7) Anticipated number of non-ABAWD participants who will begin Workfare each month: 75

(8) Total number of anticipated participants in Workfare each month (item 6+7):
275

a. Total anticipated participants for the year (monthly total (8) multiplied by 12):
3,300

(9) Annual cost of the component without participant reimbursements:

Salary and Benefits: \$ 260,000

Other Costs (overhead): \$ 90,000

Contract Costs: \$ 46,000

Total Administrative Cost: \$ 396,000

Transfer the above amounts to the appropriate component line in Table 4 Columns A, B, C, and D.

a. Average cost per participant {Total cost (9) divided by (8 a.)} \$120

(10) Anticipated number of participants reimbursed for dependent care:

a. Monthly = none

b. Yearly (monthly X 12) none

c. Annual Cost of participant reimbursement for dependent care \$ 0

Transfer the above amount to the appropriate component line in Table 4 Column E.

a. Average cost per participant (Annual Cost divided by yearly total participants

reimbursed for dependent care 0

(11) Anticipated number of participants to be reimbursed for transportation/ancillary expenses:

a. Monthly 275

b. Yearly (monthly X 12) 3,300

c. Annual Cost of participant reimbursement for transportation/ancillary:

\$198,000 Transfer this amount to the appropriate component line in Table 4 Column F.

d. Average cost per participant (annual cost divided by yearly total participants reimbursed for transportation/ancillary expenses _____) 60

(12) Total cost of the component including participant reimbursements (total of (9), (10), and (11): \$ 594,000 Annual cost of Component. Transfer this amount to the appropriate component line in Table 4 Column G.

PLAN PART II

WORK REGISTRATION AND ABAWD INFORMATION

In this part, provide a clear explanation of the methods used to estimate work registrant and ABAWD counts. County estimates should be reasonably accurate projections that are consistent with numbers previously reported by the county on the following reports:

- The Annual Work Registrant and Food Stamp Employment and Training (FSET) Program Caseload Report (STAT 48);
- The Food Stamp Program Work Registrant, Able-Bodied Adults Without Dependents (ABAWD), and Food Stamp Employment and Training (FSET) Program Caseload Report (STAT 47).

Data tables for the STAT 48 and STAT 47 can be found at <http://www.dss.cahwnet.gov/research/> under Food Stamps Data Tables, or follow the quick link drop down list at the top of the page to navigate directly to the reports. Exhibit 2 discusses more fully the relationship between the FSET plan and the Stat 47 and 48 reports. Counties are encouraged to review this exhibit, the data reports referenced above, and the definitions provided at the end of these guidelines prior to completing Part II.

A. Work Registrant Population –

1. Include the following work registrant data:
 - a. The number of work registrants in the existing food stamp caseload expected to be in the county on October 1, 2008.
 - b. The anticipated number of new work registrants to be added between October 1, 2008 and September 30, 2009.
 - c. The total number of work registrants in the county between October 1 and September 30 of the fiscal year ($a+b=c$).

Note: This number must match Table 1, Item A.

2. Unduplicated or Duplicated Work Registrant Count

FNS requires states to give an unduplicated count of work registrants. By unduplicated, we mean the following:

- Individuals included in the work registrant count as of October 1 are not included in any subsequent count of work registrants for the remaining months of the year; and
- Individuals certified for food stamps or registered for work more than once in a 12-month period are only reported as a work registrant once during that 12-month period.

Clearly explain whether the estimated number of work registrants is based on a duplicated or unduplicated count. If the count is unduplicated, describe the method used to eliminate multiple registrations. For example, the CWD may conduct a match of social security numbers to eliminate duplicate work registrations over the course of the year.

- If a county can only provide a duplicated count of work registrants, estimate in this section the portion of reported work registrants believed to be duplicated. Detail the methodology used in making this estimate.

B. Deferral Policy

Counties may defer from FSET participation categories of work registrants or individual work registrants not included in any other deferral category.

1. Describe the deferral policy and identify those categories of work registrants who will be deferred from FSET. The description of deferral policy in this part must be consistent with deferral regulations at the Manual of Policies and Procedures (MPP) Section 63-407.81.
2. Indicate the frequency with which deferrals are re-evaluated by the CWD.

C. ABAWD Population –

The ABAWD population is a subset of the work registrant population. There are always fewer ABAWDs than there are work registrants because there are added exemptions from the ABAWD work requirement which do not apply to work registration. Persons not exempt from the ABAWD work requirement are included in the county's ABAWD population even if they reside in a waiver county or are granted the 15 percent exemption.

1. Include the following ABAWD data:
 - a. The number of ABAWDs in the existing food stamp caseload expected to be in the county on October 1, 2008.
 - b. The anticipated number of new ABAWDs to be added between October 1, 2008 and September 30, 2009.

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

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

Note: This number must match Item E of Table 1.

2. Unduplicated or Duplicated ABAWD Count

FNS requires states to give an unduplicated count of ABAWDs. An unduplicated count occurs when:

Individuals included in the ABAWD count as of October 1 are not included in any subsequent count of ABAWDs for the remaining months of the year. Note: this includes ABAWDs who fail to meet the work requirement and regain eligibility in the same year; and

ABAWDs certified or registered more than once in a 12-month period are only reported once during that 12-month period.

Clearly explain whether the estimated number of ABAWDs is based on a duplicated or unduplicated count. If a county can only provide a duplicated count of ABAWDs, estimate in this section the portion of ABAWDs believed to be duplicated. Detail the methodology used in making this estimate.

PLAN PART III

PROGRAM COORDINATION

A. General Program Coordination - In this part, clearly describe how the FSET program relates to other processes in the FSP.

1. Narrative Coordination Statement - Describe the linkages between the following food stamp functions and the FSET program:

- intake, application, and recertification;
- work registration;
- screening for FSET participation;
- FSET component assignment;
- monitoring compliance with component requirements;
- determination of good cause;
- preparation of the Notice of Action (NOA); and
- disqualification due to noncompliance with program requirements.

2. Information Coordination - Briefly describe how information will be coordinated and exchanged (e.g., forms, computer linkages, documentation of participant status and actions taken). Note actions taken during the planning process to improve the coordination and information flow between the FSET program and other agency units.

Describe the intake and disqualification processes, including the procedures established to assure that appropriate disqualification actions are begun within ten days following a determination of no good cause. If the county wishes to use intake or other systems, which are compatible with its CalWORKs Welfare to Work (WTW) program, describe the proposed systems.

3. Coordination Time Frames - Describe time frames associated with the FSET program and the major FSP functions (e.g., how much time elapses between application for food stamps and referral into the FSET program, and between a finding of noncompliance and initiation of a NOA).

B. Interagency Coordination - The FSET program should be coordinated as closely as possible with other relevant programs and agencies to maximize the use of all resources to assist food stamp applicants and recipients in improving their employability and self-sufficiency. Describe the linkages between the FSET program and other programs.

1. Areas of Coordination - Identify agencies or programs with which FSET is linked and explain how the programs are linked together. Agencies or programs with which the FSET program has linkages may include EDD, Community colleges, vocational education agencies, adult education schools, social service agencies, CalWORKs WTW, WIA, and the county's GA program.

Items for which CWDs should describe linkages may include:

- Another agency delivers FSET component services.
- The CWD delivers services for another program or agency (e.g., the CWD has a contract to provide job search training to WIA clients).
- The FSET program and another program jointly operate one or more components (e.g., FSET workfare is offered in conjunction with the county's GA workfare program).
- The FSET program refers individuals to another agency or program for services (e.g., FSET participants are referred to adult education providers for basic education courses).
- Specify other areas of coordination as appropriate.

2. Methods of Coordination - Specify the methods of coordination between FSET and the agencies/programs identified in Item 1. Methods of coordination between agencies or programs may include the following:

- Non-financial interagency agreements.
- Contract for provision of services.
- Joint plans of operation (e.g., the FSET and CalWORKs programs may have prepared one integrated operations plan or manual).
- Informal referral procedures (e.g., the FSET program refers participants to WIA according to the regular intake policies for that program with no special arrangements for FSET participants).
- Specify other methods of coordination as appropriate (e.g., joint advisory committees, joint staff training, exchange of job orders, and/or job bank).

C. Contractual Arrangements - If the county anticipates contracting out any portions of the FSET program, specify which activities will be delegated to contractor(s) and briefly describe the services to be provided under the contract(s). Specific information on the contractual arrangements e.g., name of contractor, amount of the contract and contract management approach need not be included in the FSET plan unless requested by CDSS. However, this information must be maintained by the CWD and be available for review by CDSS and FNS upon request. Counties that contract out a significant portion of their FSET program should provide greater detail in this section.

PLAN PART IV

PROGRAM COSTS AND FINANCIAL MANAGEMENT

This part of the county FSET plan addresses costs of the FSET program and related financial issues.

Note: *Approval of the CWD's estimated FSET budget does not constitute approval for the release of funds. Approval and release of FSET funds to the county is contingent upon issuance of a County Fiscal Letter providing the county's FSET allocation and submission of the County Expense Claim, which must reflect actual allowable expenditures.*

Exhibit 1 on page 34, FSET Program Federal/County Financial Participation Categories is included to assist counties in understanding how the FSET program is funded with federal and county dollars.

A. Planned Costs of the County FSET Program

- 1. Operating Budget** - Table 4 captures a breakdown of the costs associated with the FSET components provided by the county. Provide a narrative description of the costs of the FSET program identified on Table 4.

If any costs shown as "Overall FSET Operational Costs" on Table 4 are not attributable to specific components, a complete explanation and justification of these costs must be included. CDSS must receive assurance that these costs do not represent any service to persons other than those for food stamp recipients participating in FSET. Costs are allowed only with prior approval of CDSS and must be adequately documented to ensure that they are necessary, reasonable, and properly allocated to the FSET program.

If the CWD plans to match FNS 50 percent administrative funding with in-kind contributions, rather than a funding allocation, please refer the FNS Q & A in ACIN I-50-07 dated September 28, 2007, and clearly explain the CWD's proposal.

If the CWD plans to use interagency agreements involving a transfer of funds to another agency of the county government, address the basis of charges for food stamp participants and the method for monitoring the agreements.

- 2. Justification of Education Costs** - States are prohibited from using federal FSET funds to pay for education services if such components can be funded with state and local dollars. Counties must provide the following:

Assurance that state and local education funds will not be supplanted with federal FSET dollars.

Explanation of why the cost of the education components can only be funded through FSET and not through other existing education programs. Explain whether

the services being provided are available to persons other than FSET participants and what the cost is for providing these services.

B. Participant Reimbursement - The CWD is responsible for reimbursing participants for necessary and reasonable expenses incurred in fulfilling FSET 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 FSET program. Participant reimbursements must not be paid for with 100 percent federal grant or 50 percent matched administrative cost funding.

Participant expenses for transportation and costs other than dependent care—per participant per month—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.

Expenditures for dependent care—per dependent per month—are reimbursed by the CWD, with 50 percent federal cost sharing, up to the actual cost of the dependent care or the Regional Market Rate,¹ whichever is lowest. The CWD may provide reimbursements above established dependent care limits, but such costs must be paid for with 100 percent county dollars.

Participants with monthly expenses that exceed the amounts and limits above may have good cause for not participating.

1. Method of Participant Reimbursement

Counties may choose between two methods for reimbursing participants. The county can either reimburse participants for actual expenses incurred, or reimburse based on a method derived by the CWD.

- a. Describe whether the CWD will reimburse participants based on the actual cost of participation or based on some other method developed by the county.
- b. If the CWD wants to provide allowances for transportation and costs other than dependent care based on the average costs of participating in FSET, describe the method to be used in determining average expenditures.
- c. If the CWD chooses to provide or arrange for dependent care services, describe the services to be provided, the referral process to the service provider, and the payment processes.

The latest regional market rates can be obtained at: <http://www.cde.ca.gov/fg/aa/cd/ap/index.aspx>

2. Procedure for Participant Reimbursement –

Counties may provide up–front allowances, or they may reimburse participants for actual expenses.

- a.** Describe the procedure to be used for reimbursing participants.
- b.** If other agencies are given responsibility for providing reimbursements to participants, explain how such costs will be reported.
- c. Cost Allocation –**
 - 1.** Describe the basis for allocating costs if the FSET program is being administered in conjunction with other employment programs serving recipients of other forms of assistance.
 - 2.** Summarize how shared costs would be allocated among the participating programs.

PLAN PART V

PROGRAM REPORTING AND MANAGEMENT INFORMATION

Counties are required to submit FSET program quarterly statistical reports (STAT 47 and an annual statistical report (STAT 48) to CDSS. The STAT 47 Report is due 15 business days after each fiscal quarter ends, and the STAT 48 report is due on November 15th of each year. Financial information is reported on a county expense claim and includes claims for the 100 percent Federal grant, 50 percent matched administrative funding, and participant reimbursements. The claim is due 30 days after the end of each federal fiscal quarter.

- A. Meeting Ongoing Federal Reporting Requirements –** Describe how FSET data will be compiled, including:
- 1. Method of Gathering Data** - Describe the method used to gather work registration and ABAWD data e.g., automated systems; aggregate hard copy reports from local agencies.
 - 2. Local reporting requirements** - Specify whether contractors' will be required to submit regular reports to the CWD, identify the information that will be contained in such reports, and note the frequency with which local agencies and contractor must report data.
- B. Organizational Responsibilities** - Provide the name and contact information for those persons in the county who have primary responsibility for gathering work registration and ABAWD data, completing the FSET plan, and preparing FSET financial reports and claims. Include the department, agency, fax and e-mail for each person.

GUIDELINES FOR COMPLETION OF FSET PLAN TABLES

TABLE 1

Estimated Participant Levels

Line A: Enter the anticipated number of work registrants in the county during FFY 2009 (October 1, 2008 through September 30, 2009).

This number must be the same as Part II, section A, entry 1c.

Line A is always equal to or greater than Line E.

Note: This estimate should be projected using data from Part A, Item 1 of the Stat 48 plus the annual total of Part A, item 1 of the Stat 47 report.

Line B: Enter the number of work registrants that are deferred from mandatory FSET participation in each of the categories 1 through 9.

Line B-10 represents the total number of deferred work registrants that will not be required to participate in FSET.

Line C: Enter the percentage of work registrants deferred from FSET. This number is equal to Line B-10 divided by Line A.

Line D: Enter the number of FSET mandatory participants. This number is equal to Line A minus Line B-10.

Line E: Enter the anticipated number of ABAWDs in the county during FFY 2009.

Line E includes ABAWDs living in waived areas and those receiving the 15% exemptions.

Line E must be less than or equal to Line A.

This number must be the same as Part II Section C, entry 1c.

Line E-1 (subset of Line E): Enter the anticipated number of ABAWDs living in waived areas during FFY 2009.

Note: For counties with a two-year waiver, this number is the same as Line E. For counties with a one-year waiver, this number is less than Line E since the waiver will end July 1, 2009 and ABAWDs not otherwise exempt will be subject to the ABAWD work requirement. Counties without a waiver should enter zero.

Line E-2 (subset of Line E): Enter the anticipated number of ABAWDs who will be granted the 15% exemption during FFY 2009.

Line E-3: Enter the total number of ABAWDs by adding Lines e-1 and e-2.

Line F: Identify the at-risk ABAWD population by deducting line e-3 from line E. At risk ABAWDs are those food stamp recipients in danger of losing eligibility if they do not satisfy the ABAWD work requirement.

TABLE 1B

Criteria for 15 Percent ABAWD Exemptions

Table 1B must be completed by FSET and Non-FSET counties, regardless of whether the county is using the 15 percent ABAWD exemption.

Counties may exempt ABAWDs who are at risk of losing their eligibility for food stamps due to not meeting the ABAWD work requirement. Counties have discretion in establishing the criteria for use of the 15 percent ABAWD exemption. The exemption criteria must be described in Table 1B.

When exempting an ABAWD under the county’s 15 percent ABAWD exemption criteria, the worker must document the basis for the exemption in the case file to avoid a quality control error.

If a county does not intend to use the 15 percent exemption, it must clearly explain why the exemption will not be used.

TABLE 2

Estimated FSET Component Placements and Program Participants

This table is to be completed by FSET counties only. Please note that Table 2 reflects both a count of component placements and a count of participants. These entries are estimated annual numbers.

A. Estimated FSET Placements

This table requires the county to specify the estimated number of ABAWD and non-ABAWDs (including volunteers) placements into components that the county expects to make on or after October 1, 2008.

Please note, an individual may begin and participate in more than one component over the course of the year. Each time the individual begins a new component, the county should count a placement. However, if an individual’s participation in a single component is not continuous (e.g., participation is interrupted by a disqualification), count the placement only at the time of initial commencement of the component. For example, if an ABAWD is placed in an activity in January, disqualified in February and re-enters the activity in March, that placement is counted only once.

Line A-1: Enter the estimated number of ABAWD applicants and recipients that the County expects to participate in a qualifying ABAWD component each month.

This estimate is determined as follows: Total the anticipated number of ABAWDs who will begin each qualifying FSET component in Part I-B and multiply this figure by 12 to represent FSET placements for the year.

Note: The estimated number of ABAWDs to be placed in job search or job club that is offered in combination with another activity to satisfy the 20-hour work requirement should not be counted in Line A-1. Only the qualifying activity with which it is combined should be counted. ABAWDs placed in the 30-day workfare job search component should not be counted separately as it is part of the larger workfare component. However, the estimated number of ABAWDs to be placed in a stand-alone job search and/or job club FSET component offered in conjunction with WIA or the Trade Act of 1977 should be counted under Line A-1 since these activities satisfy the ABAWD work requirement.

Line A-2: Enter the number of all other applicants and recipients that the County expects to participate in a component each month. This consists of ABAWDs in non-qualifying components and non-ABAWDs in both qualifying and non-qualifying components.

This estimate is determined as follows: Total the anticipated number of ABAWDs and non-ABAWDs who will begin each non-qualifying FSET component in Part I-B. Add to this the number of non-ABAWDs who will begin a qualifying component and multiply the total by 12 to represent FSET placements for the year.

Line A-3: Enter the total number of applicants and recipients expected to participate in a component each month during the fiscal year. This is the sum total of Line A-1 plus Line A-2.

Section B Estimated Individual Participation

On Table 2, Section B, provide an estimated count of individuals expected to participate in the FSET program during the fiscal year.

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. This number does not correlate with Item A of the table.

TABLE 3

Summary of County Administration and interagency Coordination for the FSET Program

This table summarizes the means by which the county administers the FSET program, including its collaboration with other agencies and programs. The county may deliver the program internally, contract for the provision of services, maintain interagency agreements, or informally refer participants to outside organizations.

On Table 3, items number 1-5, for each statement, list the agencies involved, the number of FSET placements expected to be made, and the method of coordination. (e.g. memorandum of understanding, subcontract, etc.)

TABLE 4

Operating Budget for Federal Fiscal Year 2009 - planned FSET program expenditures.

- Use actual spending for the current operating year as a starting point for future budget projections, not the levels projected in previous county FSET plans.
- The grand Total on Table 4 must equal the Grand Total on Table 5.
- If two or more activities are offered concurrently, separate all of the costs appropriately between the activities.
- For each component where assessment costs are applicable, those costs must be included in the Salary & Benefits column of the appropriate component.

Column A (Salary & Benefits) - Show the total cost for the salary and benefits of the county staff, i.e., eligibility workers, social workers, etc, (do not include contractor salary and benefit costs here.)

Column B (Other Costs) - Show the cost of overhead related to county staff, i.e., eligibility workers, social workers, etc. (do not include contractor overhead costs here)

Column C (Contract Costs) - Show the cost of any funds paid to contractors. (approximate amount to be paid to each contractor for each component.)

Column D (Dependent Care) - Total dependent care reimbursement costs for each component.

Column E (Transportation/Ancillary) - Total participant reimbursement cost for transportation and ancillary costs.

Column F (Total) - Total cost of each component (sum of columns A through E)
Grand Total Cost - should equal Table 4 Line 5.

TABLE 5

Planned Costs by Funding Category for FFY 2005- To be completed by FSET counties only.

Estimate the total costs of the county's FSET program by funding categories as shown on the table. The total costs depicted on Table 5 must be identical to those shown on Table 4.

DEFINITIONS

ABAWD - An Able-Bodied Adult Without Dependents (ABAWD) is a non-assistance food stamp recipient between the ages of 18 and 49 who does not qualify for one of the ABAWD exemptions listed in Manual of Policies and Procedures (MPP) Section 63-410.3 (see list below). Food stamp eligibility for ABAWDs is limited to any 3 months in a 36-month period (a 3-month time limit) unless the individual meets the ABAWD work requirement (see definition below).

ABAWD Exemptions - Persons are exempt from the ABAWD work requirement if they are exempt from food stamp work registration (see list of work registration exemptions below);

- Under 18 or over 50 years of age;
- Residing in a food stamp household that includes a child under 18 years of age; or
- Pregnant.

ABAWD 15% Exemption - The 15 percent exemption is a temporary exemption that counties may grant to ABAWDs who have used their three out of 36-months without meeting the ABAWD work requirement and are unable to meet the work requirement due to circumstances beyond their control. CDSS 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 FSET participation or causes a temporary reduction in hours worked, social and emotional barriers, remoteness, temporary homelessness, lack of adequate transportation, domestic violence, recent released 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 Table 1 of the FSET plan.

ABAWD Waiver - The Food and Nutrition Service (FNS) may approve 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 Department of Labor (DOL), having a recent unemployment rate above 10 percent or having an unemployment rate 20 percent greater than the national average over a two-year period.

ABAWD Work Requirement and Three-Month Limit - Eligibility for food stamps is limited to 3 months in a 36-month period unless the ABAWD, who is age 18 to 49, meets the following work requirements:

- works 20 or more hours a week, averaged monthly;

- participates in an allowable work activity such as an education or vocational training program for 20 or more hours a week; or
- participates in a workfare program.

ABAWDS can continue to receive food stamps for more than three months in a 36-month period if they meet the above work requirement or one of the following conditions:

- meet ABAWD exemption criteria,
- live in a county with an ABAWD waiver, or
- receive 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 food stamps for one grace period of three consecutive months 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. If combined with work experience, some form of job search or job club, an assessment could constitute part of an approvable FSET component.

At-risk ABAWD - An ABAWD who is residing in a non-waiver county and is in danger of losing food stamp eligibility due to exhaustion of the three months out of 36-month time limit for persons not satisfying the ABAWD work requirement.

Component - A service, activity, or program, as described in the Manual of Policies and Procedures (MPP) Section 63-407.841, which is designed to help food stamp recipients gain skills, training, or work experience that will increase their ability to obtain regular employment and achieve self–sufficiency.

Within the FSET Program, components are designated either as “work” or “non–work.” Work components consist of Workfare, Self-Initiated Workfare, On-The-Job Training (OJT) and Work Experience. Non-work components consist of Job Search, Job Club, Education, and Vocational Training. Individuals may be required to participate in multiple components simultaneously provided hours of participation do not exceed the maximum parameter of 120 per month.

- Hours of participation in a work component are limited to the number obtained by dividing the household’s monthly food stamp allotment by the higher of the applicable federal or state minimum wage. In California, the state minimum wage is higher than the federal minimum wage.

- Hours in a non-work component can range from 12 to 120 per month.
- The maximum number of hours that can be required of an FSET participant is 30 hours per week or 120 hours per month.
- Effective October 1, 2008, FSET voluntary participants are not subject to the 120 hour limit established for mandatory participants. Hours of participation in FSET workfare components are not limited to the number determined by dividing the food stamp allotment by the minimum wage. This provision was added by Section 4108 of the Food, Conservation, and Energy Act of 2008 (the Farm Bill).
- An FSET program may include, but is not limited to, one or more of the following components:

Non-work components:

Supervised and Unsupervised Job Search - Requires participants to make a predetermined number of inquiries 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. 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. The component may consist of job search activities, job skills assessments, job finding clubs, job placement services, or other training or support activities.

Vocational Training — This component is designed to improve the employability of participants by providing training in a skill or trade that allows the participant to move directly into employment.

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), high school equivalency (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 educational components that establish a direct link to job-readiness will be approved.

Federal FSET funds cannot take the place of nonfederal (i.e., State, local) funds for existing educational services. Federal Financial Participation (FFP) for operating education components may be authorized only for costs that exceed the normal cost of services provided to persons not participating in FSET.

Work components:

Workfare -The food stamp recipients perform work in a public service capacity as a condition of eligibility. In lieu of wages, workfare participants receive compensation in the form of their household's monthly coupon allotment.

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.

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

Self-Initiated Workfare - This component is designed to assist ABAWDs in fulfilling their work requirement. In self-initiated programs ABAWDs voluntarily participate, and find their own workfare job assignments. They are responsible for arranging to have their participation reported to their caseworkers and for verifying their workfare hours.

Work Experience or On-the-Job Training — This component is designed to improve the employability of participants through actual work experience and/or training, and enable them to move into regular employment. Work experience or on-the-job training assignments may not replace the employment of a regularly employed individual. And, they must provide the same benefits and working conditions provided to regularly employed individuals performing comparable work for comparable hours. It is permissible to place FSET participants in work experience positions with private sector entities.

Workforce Investment Act (WIA) Training - Under the WIA, job training services are developed, managed, and administered by State and local governments and the business community under WIA. Activities include basic skills training (GED, literacy), occupational skills training, on-the-job training, work experience, and job search assistance.

Alcohol or Drug Rehabilitation (AOD) and Mental health (MH) Counseling - FSET components may include participation in AOD rehabilitation and MH counseling provided the following conditions are met:

- The AOD and/or MH counseling activities provide social and support services, such as discussion groups and general counseling that can be directly linked to the participant's employability.
- AOD and MH counseling are not treated as a separate component, but constitute a minor portion of the primary component to which they are linked.
- Hours of participation in AOD rehabilitation and MH counseling do not exceed 25 percent of the combined FSET activities e.g., a 20-hour per week combination component might consist of 15 hours spent in vocational training with the remaining 5 hours devoted to participation in AOD treatment. When offered as part of a vocational training or educational activity, hours of participation in AOD or MH counseling count toward completion of the ABAWD work requirement.

In order to qualify for FSET program reimbursement, AOD or MH services must:

- Be reasonably necessary and directly related to FSET program component participation;
- Not be considered “medical” (i. e. a course of treatment provided by licensed physicians, psychologists, etc.)
- Not be available through another government program or available at no cost to the participant through a private source such as a charitable organization.
- Job Retention Services - Effective October 1, 2008, counties are authorized to provide job retention services for up to 90 days for FSET participants who gain employment. This activity was added by Section 4108 of the Food, Conservation, and Energy Act of 2008 (the Farm Bill).
- Section 4108 also removes the 30 hour per week FSET participation limit for those who volunteer to participate in an FSET component. Both of these provisions take effect October 1, 2008 and may be implemented at that time.

State agencies that opt to provide job retention services in FFY 2009 must include in their FSET plan a detailed description of the retention services they plan to provide. The description must identify the type, length, estimated cost, and portion of the food stamp population targeted to receive these services. Proposed job retention services should be described in Part I of the FSET plan and the costs associated with the services should be included in Part IV. Table 4 of the plan should include the job retention component and the associated costs.

States may use their 100 percent federal allocation as well as 50 percent federal/50 percent state dollars to administer approved job retention services. Costs of participant reimbursement for transportation and ancillary expenses that are reasonably necessary and directly related to job retention services will be matched with 50 percent federal dollars. Unless the Food and Nutrition Service (FNS) approves the proposed services, Federal funds may not be used to provide them.

Contractor - Any public or private entity that is providing FSET 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 FSET Program.

Food Stamp Employment and Training Program - A county administered program designed to assist food stamp recipients increase their employability and self-sufficiency through participation in job search, job club, workfare, education and/or vocational training components.

FSET Mandatory Participant - A FSP applicant or recipient who is neither exempt from food stamp work registration, nor deferred from participation in FSET. Typically, a county does not assign all mandatory participants to an FSET activity either because some participants are not targeted by the county to receive FSET services, or because FSET funds are insufficient to serve all participants. All mandatory participants must be identified in item D of Table 1.

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 food stamp 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/on-the-job training (OJT), vocational training and education. Stand-alone FSET 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 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 person should or should not be referred for participation in an FSET program. This activity is not an approvable FSET component.

Volunteer - A food stamp recipient who chooses to participate in FSET and is either exempt from food stamp work registration or deferred from FSET participation. Volunteers are not subject to sanction for failure to comply with FSET 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. Each component of a county's FSET program must be delivered through its workforce development system. If the component is not available locally through such a system, the county may use another source.

Work Program - For purposes of satisfying the ABAWD work requirement, a work program is:

- A program under the Work Investment Act (WIA). Participation in job search activities of 20 hours or more per week under the WIA satisfies the ABAWD work requirement. This is not the case for the stand-alone FSET job search component at MPP Section 63-407.841.
- 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. Unlike stand-alone FSET job search, job search activities of 20 hours or more per week under the Trade Act satisfy the ABAWD work requirement.

- An employment and training program, including the FSET Program, other than a job search or job club component.

Note: To qualify for FSET funds, a work program must be included in the State FSET Plan and it must adhere to the minimum and maximum participation requirements established for FSET.

Work Registrant - A non-assistance food stamp applicant or recipient who is subject to food stamp work requirement at Manual of Policies and Procedures (MPP) Section 63-407.4, unless the individual meets one of the work registration exemptions at MPP Section 63-407.21 (see list below).

Work Registration Exemptions - An individual is exempt from food stamp work registrant requirements if he/she meets one of the exemptions at MPP Section 63-407.21 (see list below):

- Younger than 16 years of age or 60 years of age or older;
- 16 or 17 year old who is not head of 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 6 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;
- Half-time school attendance.

Work Registrant Requirements - As a condition of food stamp eligibility, every NAFS 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;

- Participate in the FSET Program if assigned by the county;
- Provide sufficient information 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
- Must not voluntarily quit a job of 30 or more hours a week or reduce work hours to less than 30 hours a week without good cause.

**EXHIBIT 1
FSET PROGRAM FEDERAL/COUNTY
FINANCIAL PARTICIPATION CATEGORIES**

ACTIVITIES	FINANCIAL PARTICIPATION
FSET administrative costs	100 percent federal funding, up to the amount of the approved allocation
FSET administrative costs which exceed the 100 percent federal fund allocation	50 percent federal and 50 percent county funding
Participant reimbursement for transportation and ancillary costs incurred to participate in the FSET program	50 percent federal and 50 percent county funding of <u>actual</u> costs
Participant reimbursement for dependent care cost incurred to participate in the FSET program	50 percent federal and 50 percent county funding of the lower of actual dependent care costs or the Regional Market Rate*
	Participant reimbursement costs above the 50 percent rate are not eligible for additional federal funding

*The latest California Regional Market Rate for dependent care may be found at:
www.cde.ca.gov/fq/aa/cd/ap/index.aspx.

EXHIBIT 2
RELATIONSHIP OF THE ANNUAL FSET PLAN TO QUARTERLY
STAT 47 AND STAT 48 REPORTS AND FSET EXPENSE CLAIMS

FSET Plan

The annual FSET plan provides estimates of the planned activities and program costs for the FFY.

STAT 47 and STAT 48 Data Report

The quarterly STAT 47 and annual STAT 48 data reports are compiled to provide FNS with the actual number of work registrants and ABAWDs for each quarter as well as the number of persons participating in FSET components, and the number of ABAWDs receiving the 15 percent exemption or living in a county with an ABAWD waiver. The data from these reports also provide a starting point for counties to develop estimates for the next year's FSET plan. Unless the county anticipates significant changes in the size and characteristics of its food stamp population or the number of persons to be served in FSET, estimates for the number of work registrants, ABAWDs, and component placements should not differ significantly from that reported on the Stat 47 and 48 forms.

The STAT 47 Report is due 15 business days after each fiscal quarter ends, and the STAT 48 report is due on November 15th of each year. Data from these reports is used by CDSS to provide data to FNS on the number of work registrants and FSET program participation by non-ABAWDs and ABAWDs as well as utilization of the 15% ABAWD exemption. FNS in turn utilizes work registrant and ABAWD data to determine the annual amount of FSET funds and 15 percent ABAWD exemptions that will be allocated to each state. Thus, counties should periodically review their data reports to ensure accuracy in completing the Stat 47 and 48 reports.

FSET County Plan Template - Enclosure 2

COUNTY PLAN COVER SHEET
(To be completed by counties offering FSET)

County of _____

ABAWD County Waiver? Yes___or No___

Number of FSET Components _____

Prepared by: _____

Title: _____

Telephone: _____

Fax: _____

E-mail: _____

Date Submitted: _____

PART I

SUMMARY OF COUNTY FOOD STAMP EMPLOYMENT AND TRAINING PROGRAM

(Refer to the FFY 2009 FSET Handbook for detailed instructions).

Part I of the county FSET plan summarizes the FSET program that the CWD plans to implement.

A. Abstract of the County FSET Program – Provide a narrative description of your county's FSET program and include the following information:

- 1. Program Changes** - Describe the nature of changes, if any, being made to the FSET program. If the county elects to provide job retention services note that change in this section and below in item 2.
- 2. Program Components** –List the county's FSET components (job search, job club, education, vocational training, workfare, self-initiated workfare, on-the-job training, work experience, job retention services, other).
- 3. Sequencing of Components and Concurrent Assignments** - If applicable, describe any sequence of FSET components as well as concurrent assignment of participants to more than one component.
- 4. Other Employment Programs** - Identify other employment programs and explain any interface between these programs and FSET.
- 5. Workforce Development System** - Explain how FSET components will be delivered through the workforce development system. Discuss the means by which the county will provide components not offered through the system.
- 6. Outcome Data** - Provide any FSET outcome data available to the county.

B. FSET Components Summaries – Use the following template in describing the county's FSET components. (Use this template for each component that is offered). The cost of each component must be shown on Table 4.

(1) Component name: _____

(2) Component type: _____

(3) Component description:

- a. Component Activities. Describe the activities that comprise the component.
- b. Participation Requirements. Identify the length of the component and the weekly/monthly participation requirements.
- c. Organizational Responsibilities. Explain how the component is administered and identify the entities involved in administering it.

(4) Geographic areas covered and variations among local areas:

- County-wide
- Other

(specify): _____

(5) Targeted populations (e.g., ABAWDs, General Assistance recipients) Please be specific. _____

(6) Anticipated number of ABAWD participants who will begin each month: _____

(7) Anticipated number of non-ABAWD participants who will begin each month: _____

(8) Total number of anticipated participants each month (6+7): _____

- a. Total anticipated participants for the year {monthly total (8) multiplied by 12}: _____

(9) Annual cost of the component without participant reimbursements:

Salary and Benefits: \$ _____

Other Costs (overhead): \$ _____

Contract Costs: \$ _____

Total Administrative Cost: \$ _____

Transfer the above amounts to the appropriate component line in Table 4 Columns A, B, C, and D.

- a. Average cost per participant {Total cost (9) divided by (8 a.)} = \$ _____

(10) Anticipated number of participants reimbursed for dependent care:

- a. Monthly _____ total must not be greater than participant total in (8)
- b. Yearly (monthly X 12) _____ total must not be greater than total in (8 a.)

c. Annual cost of participant reimbursement for dependent care \$ _____

Transfer the above amount to the appropriate component line in Table 4 Column E.

d. Average cost per participant for dependent care :
(10 c.) divided by (10 b.) = \$ _____

(11) Anticipated number of participants to be reimbursed for transportation/ancillary expenses:

- a. Monthly _____ total must not be greater than participant total in (8)
- b. Yearly (monthly X 12) _____ total must not be greater than total in (8 a.)

Note: If this number is 0, the county must explain how participant transportation needs and expenses are addressed in Part IV, Section (2).

c. Annual cost of participant reimbursement for transportation/ancillary:
\$ _____

Transfer the above amount to the appropriate component line in Table 4 Column F.

If ancillary expenses are provided for participants in a component please describe the reimbursable ancillary expenses:

d. Average cost per participant for transportation/ancillary reimbursement:
Annual cost (11c) divided by participants (11b.) = \$ _____

(12) Total annual cost of the component including participant reimbursements

(9) plus (10 c.) plus (11 c.) = \$ _____

Transfer the above amount to the appropriate component line in Table 4 Column G.

Part II

WORK REGISTRATION AND ABAWD INFORMATION

(Refer to the FFY 2009 FSET Handbook for detailed instructions)

County estimates for work registrants and ABAWDs should be reasonably accurate projections that are consistent with numbers previously reported by the county on the following reports:

- The Annual Work Registrant and Food Stamp Employment and Training (FSET) Program Caseload Report (STAT 48);
- The Food Stamp Program Work Registrant, Able-Bodied Adults Without Dependents (ABAWD), and Food Stamp Employment and Training (FSET) Program Caseload Report (STAT 47).

Data tables for the STAT 48 and STAT 47 can be found at <http://www.dss.cahwnet.gov/research/> under Food Stamps Data Tables, or follow the quick link drop down list at the top of the page to navigate directly to the reports. Counties are encouraged to review the above data reports and definitions provided in the FSET plan handbook prior to preparing their estimates.

Provide a clear explanation of the methods used to estimate work registrant and ABAWD counts. Use data from the current fiscal year, whenever possible, in formulating the projection. Be as accurate as possible in developing these estimates.

A. Work Registrant Population -

1. Work Registrant Counts - Estimate the following:

- a. The number of work registrants in the existing food stamp caseload expected to be in the county on October 1, 2008.(see STAT 48) _____
- b. The anticipated number of new work registrants to be added between October 1, 2008 and September 30, 2009. (see STAT 47)_____
- c. The total number of work registrants in the county between October 1 and September 30 of the fiscal year (a+b=c). _____

Note: This number must match Table 1, Item A.

2. Unduplicated or Duplicated Work Registrant Count

FNS requires states to give an unduplicated count of work registrants so counties must make every effort to do so. By unduplicated, we mean the following:

- individuals included in the work registrant count as of October 1 are not included in any subsequent count of work registrants for the remaining months of the year; and
- Individuals certified for food stamps or registered for work more than once in a 12-month period are only reported as a work registrant once during that 12-month period.

Indicate whether the count of work registrants is unduplicated or duplicated. If the count is unduplicated, describe the method used to eliminate multiple registrations. If the county is not able to produce an unduplicated count, describe how the CWD reports this number to CDSS. Report any plans to adopt a system to eliminate duplicate counts, including a time frame as to when the system is expected to be operational.

B. Deferral Policy

- 1. Describe the deferral policy and identify those persons that will be deferred (must be consistent with deferral counts shown in Item B of Table 1).**

- 2. Indicate the frequency with which deferrals are re-evaluated.**

C. ABAWD Population

Note: The ABAWD population is a subset of the work registrant population. There are always fewer ABAWDs than there are work registrants because there are added exemptions from the ABAWD work requirement which do not apply to work registration. Persons not exempt from the ABAWD work requirement are included in the county's ABAWD population even if they reside in a waiver county or are granted the 15 percent exemption.

1. ABAWD Counts - Estimate the following:

- a. The number of ABAWDs in the existing food stamp caseload expected to be in the county on October 1, 2008. _____
- b. The anticipated number of new ABAWDs to be added between October 1, 2008 and September 30, 2009. _____

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

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

Note: This number must match Item E of Table 1.

2. Unduplicated or Duplicated ABAWD Count

Explain whether this count is duplicated or unduplicated. If the count is unduplicated, describe the method used to count an individual only once during the year. If the count is duplicated, explain the method used to eliminate the portion of ABAWDs believed to be duplicated and detail the methodology used to make this determination.

PART III

PROGRAM COORDINATION

(Refer to the FFY 2009 FSET Handbook for detailed instructions)

A. General Program Coordination - Describe how the FSET program relates to other processes in the FSP.

1. Narrative Coordination Statement - Describe the linkages between the following food stamp functions and the FSET program:

- intake, application, and recertification;
- work registration;
- screening for FSET participation;
- FSET component assignment;
- monitoring compliance with component requirements;
- determination of good cause;
- preparation of the Notice of Adverse Action; and
- disqualification due to noncompliance with program requirements.

2. Information Coordination - Describe how information will be coordinated and exchanged and explain the intake and disqualification processes.

3. Coordination Time Frames - Describe time frames associated with the FSET program and the major FSP functions.

B. Interagency Coordination - Describe the linkages between the FSET program and other programs.

1. Areas of Coordination - Identify agencies or programs with which FSET is linked and explain how the programs are linked together.

2. Methods of Coordination - Specify the methods of coordination between FSET and the agencies/programs identified in Item 1 above.

C. Contractual Arrangements - If applicable, specify those FSET activities that will be delegated to contractor(s).

PART IV

PROGRAM COSTS AND FINANCIAL MANAGEMENT

(Refer to the FFY 2009 FSET Handbook for additional instructions)

A. Planned Costs of the County FSET Program

- 1. Operating Budget** - Provide a narrative description of the costs of the FSET program identified on Table 4.

- 2. Justification of Education Costs** - If education components are included, explain why the cost of such components can only be met through FSET and not through other existing education programs. Discuss the availability and cost of providing the education activities to those not participating in FSET.

B. Participant Reimbursement -

1. Method of Participant Reimbursement

- a.** Describe whether the CWD will reimburse participants based on the actual cost of participation or based on some other method developed by the county.

- b.** If the CWD wants to provide allowances for transportation and costs other than dependent care based on the average costs of participating in FSET, describe the method to be used in determining average expenditures.

- c.** If the CWD chooses to provide or arrange for dependent care services, describe the services to be provided, the referral process to the service provider, and the payment processes.

2. Procedure for Participant Reimbursement -

- a.** Describe the procedure to be used for reimbursing participants.

- b.** Explain how costs will be reported if other agencies are given responsibility for providing reimbursements.

C. Cost Allocation –

- 1.** Describe the basis for allocating costs if FSET is administered in conjunction with other employment programs.

- 2.** Summarize how shared costs will be allocated among the pertinent programs.

PART V

PROGRAM REPORTING AND MANAGEMENT INFORMATION

(Refer to the FFY 2009 FSET Handbook for detailed instructions)

A. Meeting Ongoing Federal Reporting Requirements – Describe how FSET data will be compiled, including:

- 1. Method of Gathering Data** (Describe the method used to gather work registration and ABAWD data).

- 2. Local reporting requirements -** Specify whether contractors will be required to submit regular reports to the CWD, identify the information that will be contained in such reports, and note the frequency with which local agencies and contractors must report data.

B. Organizational Responsibility

- 1. Person responsible for Work Registrant and ABAWD reporting**

Name: _____
Title: _____
Department/Agency: _____
Phone Number: _____
Fax: _____
E-mail Address: _____

- 2. Person responsible for Preparing the FSET Plan -**

Name: _____
Title: _____
Department/Agency: _____
Phone Number: _____
Fax: _____
E-mail Address: _____

- 3. Person responsible for FSET Financial Analysis and Claims –**

Name: _____
Title: _____
Department/Agency: _____
Phone Number: _____
Fax: _____
E-mail Address: _____

TABLE 1

(Refer to the FSET Handbook for additional instructions on completing plan tables)

ESTIMATED PARTICIPANT LEVELS

- A.** Anticipated number of work registrants in the county during the fiscal year _____
(Enter the number from Part II Section A-1 Line c)

- B.** Anticipated number of work registrants deferred from mandatory FSET participation due to the following categories:
 - 1.** Lives in a non-FSET county _____
 - 2.** Participates in a substitute program that has participation requirements that exceed FSET participation requirements _____
 - 3.** Lacks dependent care _____
 - 4.** Lacks transportation to an FSET Program site _____
 - 5.** Lives an unreasonable distance from the FSET Program site _____
 - 6.** Has a severe family crisis _____
 - 7.** Temporarily unemployed and expected to return to work within 60 days _____
 - 8.** Involved in legal difficulties _____
 - 9.** Has a temporary illness or disability _____
 - 10.** Total number of deferred work registrants (add B.1 through B.9) _____

- C.** Percent of all work registrants deferred from FSET (Line B 10 total ÷ Line A) _____%

- D.** Number of FSET mandatory participants (Line A minus Line B10total) _____

- E.** Anticipated number of ABAWDs in the county during the fiscal year _____
(Line E must be less than or equal to Line A)
 - E.1** Anticipated number of ABAWDs in waived areas of the county during the fiscal year. (Subset of Line E)
(Enter the number from Part II Section C-1 Line c) _____

 - E. 2** Anticipated number of ABAWDs exempted under 15 percent ABAWD exemption allowance during the fiscal year (Subset of Line E) _____

 - E. 3** Total subset of ABAWDs (E.1 + E. 2) _____

- F.** At-risk ABAWDs expected in the county during the fiscal year (E minus E.3) _____

TABLE 1B

CRITERIA FOR 15 PERCENT ABAWD EXEMPTIONS

Provide the criteria that the county will use to exempt additional ABAWDs under the county's 15 percent ABAWD allocation. If the county is not using the exemption, provide an explanation below.

Exemption criteria for FFY 2009:

Reason for not implementing the 15 percent ABAWD exemption:

TABLE 2

ESTIMATED FSET COMPONENT PLACEMENTS AND PROGRAM PARTICIPANTS

A. ESTIMATED FSET PLACEMENTS

1. Number of ABAWD applicants and recipients expected to participate in a qualifying ABAWD component each month _____
2. Number of all other applicants and recipients expected to participate in a component each month, i.e., ABAWDs in non-qualifying activities and non-ABAWDs in both qualifying and non-qualifying activities _____
3. Total number of applicants and recipients expected to participate in a component each month during the fiscal year (A-1 + A-2) _____

B. ESTIMATED INDIVIDUAL PARTICIPATION

1. Unduplicated number of individuals expected to participate in the FSET Program during the fiscal year _____

This number should be less than or equal to line A-3 above because this is an unduplicated count.

TABLE 3

SUMMARY OF County Administration And INTERAGENCY COORDINATION FOR THE FSET PROGRAM

Coordination Areas	Agencies Involved	Number of FSET Placements Expected	Methods of Coordination
1. Delivers an FSET component			
2. The FSET program delivers a service for another agency or program			
3. Joint component of the FSET program and another agency or program			
4. Referral of individuals from the FSET program to another program or agency			
5. Other forms of coordination (specify)			

TABLE 4**OPERATING BUDGET**

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

Abbreviations:

OJT = On-the-Job Training WE = Work Experience

Reminders:

1. Separate the costs of operating concurrent activities and charge the costs to each appropriate component. For example, if you offer Vocational Training and Job Club concurrently, then put the Vocational Training costs on Line 6 and the Job Club costs on line 2.
2. Charge contract costs of drug and alcohol rehabilitation, mental health counseling, and enhanced supportive services to the accompanying component in column C.

TABLE 5: FFY 2009 PLANNED COSTS BY FUNDING CATEGORY

COUNTY: _____

	<u>Funding Categories</u>	<u>Estimates of Cost</u>
1	100 Percent Federal FSET 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) <i>Must agree with Table 4's Grand Total Cost</i>	