

DEPARTMENT OF SOCIAL SERVICES

744 P Street, Sacramento, CA 95814



June 26, 1992

ALL-COUNTY LETTER NO. 92-62

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

Reason for this Transmittal

- [] State Law Change
[] Federal Law Change
[] Court Order
[] Clarification Requested
by One or More Counties
[x] Self-Initiated by SDSS

SUBJECT: FOOD STAMP EMPLOYMENT AND
TRAINING (FSET) PROGRAM PLANNING GUIDELINES

REFERENCE: MPP 63-407
ALL-COUNTY LETTER 89-64

The purpose of this letter is to provide Counties with FSET Program Planning Guidelines for Federal Fiscal Year (FFY) 1993 (October 1, 1992 to September 30, 1993). It will be necessary for each County to develop and submit a plan of operation for the program by July 31, 1992. The County plans will be compiled into a State Plan that must be approved by the Food and Nutrition Service (FNS). Attached are the FSET Planning Guidelines (Attachment I) which contain detailed descriptions of the FSET program requirements and plan format.

Funding for the FSET Program

The FNS provides a 100 percent Federal allocation for the administrative cost of the program based on the number of work registrants in each State as a percentage of the number of work registrants nationwide. Attachment II reflects your County's estimated administrative share of the 100 percent Federal funds, and 50 percent Federal/35 percent State/15 percent County funding based on your County's percent to total of the statewide nonassistance food stamp caseload.

Final allocations will be issued when FNS approves the State Plan. The final allocation will be based on: (1) Counties' requests for funds, (2) State funds available for program costs in excess of 100 percent Federal amounts, and (3) FNS approval of the State Plan and budget. The State 35 percent share for program cost is subject to State funds availability. Program expenditures in excess of the 100 percent Federal allocation and the 50/35/15 allocation can be funded, at County option, with 50

percent Federal/50 percent County funds. All fund requests must be accurate and justifiable. To the extent that proposed services are consistent with Federal requirements, requests will be forwarded to FNS for approval as part of the State Plan.

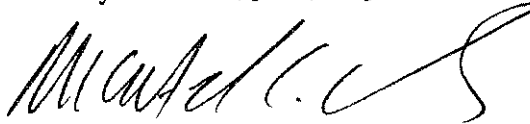
County Plan Submittal

Please follow the County Plan format in Attachment I when preparing your plan. Counties desiring total geographical exclusion need only complete part V of the County Plan Format.

Please send two copies of your FSET plan and/or request for geographical exclusion and the name and phone number of your county's FSET coordinator by July 31, 1992 to:

GAIN and Employment Services Policy Bureau
744 P Street, M.S. 6-138
Sacramento, CA 95814

If you have any questions, please have your staff contact your Employment Operations Analyst at (916) 654-1462.



MICHAEL C. GENEST
Deputy Director
Welfare Programs Division

Attachments

cc: CWDA

FOOD STAMP EMPLOYMENT AND TRAINING PROGRAM PLANNING GUIDELINES

- A. Definitions
- B. Program Requirements
- C. County Plan Format Outline

A. DEFINITIONS

Alternate program delivery: The delivery of Food Stamp Employment and Training (FSET) Services through existing programs such as General Assistance (GA), Refugee Services, or Greater Avenues for Independence (GAIN).

Base of Eligibles: FSET mandatory participants (defined below) plus persons who volunteer for FSET participation.

Certified: An individual who is approved to receive food stamps.

Component: A job club/job search, education, work or training assignment designed to help food stamp participants to move promptly into unsubsidized employment.

Deferred registrant: A work registered individual whose circumstances defer him/her from participating in FSET activities. Work registrants who are participating in programs that have standards exceeding those for FSET also may be deferred.

Employment and training grant: 100 percent Federal funding to cover the administrative and program cost involved in operating FSET. This does not cover participant reimbursement.

Employment and training program: A program operated by a County consisting of one or more FSET components.

Geographic exclusion: A county or part of a county that, due to compelling reasons, is approved by the Food and Nutrition Services (FNS) to be excluded from operating FSET.

Individual deferral criteria: Criteria for deferring an individual for personal reasons, such as lack of child care, lack of transportation, mental problems, etc.

Mandatory participant: A work registrant who is not deferred from participation.

Matched funding: Funding at the 50 percent FFP level of program costs in excess of the 100 percent allocation. If the plan activities are approved, counties will receive an allocation of the proportionate share of 50 percent federal/35 percent state/15 percent county funds. For approvable activities above that level, counties may participate at a 50 percent federal/50 percent county rate.

Participant reimbursement funding: The 50 percent federal/35 percent state/15 percent county funding for the costs of participation, such as transportation and dependent care.

Placement: A "placement" occurs when a work registrant starts a component or is sent a Notice of Adverse Action (NOAA) for noncompliance or is denied certification due to noncompliance with an FSET Program requirement. Persons who fail to comply with other work registrant requirements or who voluntarily quit a job and are sent a NOAA may not be considered "placed".

Substitute program: A program that has participation requirements which exceed those contained in the FSET Program.

Work registrant: An individual who is required to register for work pursuant to Manual of Policies and Procedures (MPP) Section 63-407.1.

B. PROGRAM REQUIREMENTS

COMPONENTS

The following is a description of the categories of components and allowable participation requirements. The number of months and number of successive components in which participation is required may be determined by the county as long as the minimum and maximum participation requirements of the program are met.

Requirements may vary among participants. The maximum hours of participation imposed on each individual must not exceed 120 hours per month, including non-work and work component hours, Food Stamp Workfare program hours, and hours worked for compensation, in cash or in kind. Both applicants and recipients of food stamps may be required to participate in the various components.

JOB CLUB/JOB SEARCH:

- o Job club (job search workshop) consists of group training sessions in job finding skills, job interviewing skills, understanding employer requirements and expectations, and in enhancing self-esteem, self-image, and confidence.
- o Supervised job search consists of an organized method of seeking work and may include access to phone banks, job orders, and direct referrals to employers.
- o Unsupervised job search consists of independent efforts by a registrant to look for employment and follow-up interviews by professional staff to determine the adequacy of the job search.

Participation requirements:

The minimum participation requirement in job search is 12 hours a month for two months or an equivalent effort. The minimum participation requirement of job club is 16 hours. Participation requirements cannot be imposed if they would delay the determination of eligibility for or issuance of benefits to any household otherwise eligible. In job search, the participation requirement may begin at application for an initial period of up to eight consecutive weeks and continue for an additional period of up to eight weeks during 12 consecutive months. The 12-consecutive-month period may begin at any time following the close of the initial eight consecutive week period imposed on an applicant.

EDUCATION:

- o Education includes educational program or activities to improve basic skills or otherwise improve employability, such as Adult Basic Education, English as a Second Language, and high school equivalency (GED).

Participation requirements:

Education participation requirements have not been finalized by FNS. Requests will be reviewed by the State and forwarded to FNS for approval.

WORK COMPONENTS:

- o Workfare consists of a nonsalaried assignment with a public or private nonprofit agency that provides the registrant the opportunity to develop basic work habits or to practice existing skills. Individuals assigned to workfare must be provided the same benefits and working conditions provided to employees performing comparable work for comparable hours. In addition, a workfare assignment cannot result in the displacement of employee individuals or in the reduction of employment opportunities, such as substituting a workfare person in a vacant position.
- o OJT/Work Experience consists of an assignment to provide work experience or training or both to enable participants to move promptly into regular public or private employment. The assignment is limited to projects that serve a useful public purpose in fields such as health, social services, environmental protection, etc. The assignment cannot replace a regular employee but must provide the same benefits and working conditions that are provided to regular employees.

Participation requirements:

There are maximum participation limits for both households and individuals. Work component participation requirements imposed collectively on members of a household each month are limited to the number of hours equal to the household's allotment for that month divided by the higher of the applicable State or Federal minimum wage. The limits for individuals are specified in MPP 63-407.85 .

TRAINING:

Vocational training is a project or program, such as a supported work program or a Job Training Partnership ACT (JTPA) or state or local program aimed at accomplishing the purpose of the FSET.

Participation Requirements:

There are no specific participation requirements, as long as the FSET minimum and maximum participation requirements are met. The limits for individuals are specified in MPP 42-407.85.

ALTERNATE SERVICE DELIVERY METHODS:

Each County has the flexibility to choose the type of FSET component(s) it will operate. The county may operate the program or contract with another organization to operate the program.

Counties that operate their own programs may establish independent FSET components and/or use existing components of other work programs in General Assistance, the Refugee Employment Services Program or GAIN. If existing components are used, the following conditions must be met:

- o Participation and sanction requirements are consistent with FSET.
- o The components are described in an approved county plan.
- o Activities associated with the delivery of services to FSET participants are time-studied and claimed to the FSET Program in accordance with applicable time study and claiming instructions issued by Fiscal Policy and Procedures Bureau (FPPB).

C. COUNTY PLAN FORMAT OUTLINE

PART I: SUMMARY OF FOOD STAMP EMPLOYMENT AND TRAINING PROGRAM

- A. Component Summary.....
- B. Geographic Coverage.....

PART II: PROGRAM PARTICIPATION AND EXEMPTIONS

- A. Work Registrant Population.....
- B. Deferral Criteria.....
 - 1. Individual Deferral Criteria and Justification.....
 - 2. Partial Geographic Exclusion Criteria and Justification.....
 - 3. Estimated Participant Levels (Table 1).....
 - 4. Planned FSET Program Participants (Table 2).....
- C. Planned FSET Program Participants.....

PART III: PROGRAM COORDINATION

- A. Intra-Agency Coordination.....
- B. Inter-Agency Coordination (Table 3).....

PART IV: PROGRAM COSTS AND FINANCIAL MANAGEMENT

- A. Planned Costs of the County FSET Program.....
 - 1. Sources of FSET Funds (Table 4).....
 - 2. Operating Budget (Table 5).....
 - 3. Justification of Costs.....
 - 4. Contractual Arrangements.....
 - 5. Participant Reimbursement.....
 - 6. Cost Allocation.....

PART V: PROGRAM REPORTING AND MANAGEMENT INFORMATION

- A. Work Registrant Population.....
- B. Exclusion Justification.....

PART VI: PROGRAM REPORTING AND MANAGEMENT INFORMATION

- A. Method for Obtaining Initial Count of Work Registrants.....
- B. Management Information System (MIS) Method.....
- C. Organizational Responsibility for FSET Reporting.....

**PART I. SUMMARY OF THE COUNTY FOOD STAMP EMPLOYMENT
AND TRAINING PROGRAM (FSET)**

A. Component Summary

A detailed summary of the Program the County plans to operate shall be provided in Part I Section A of the plan. Below are explanations of items which must be included in all component summaries required in Part I Section A (see example). The information should reflect one year of operation.

- o **Description of component structure.** Describe the participant activities of the component.
- o **Type of component.** Each component must be designated as either a work or non-work component. For purposes of the county plan, a "work component" is defined as an actual job in the workplace. This is limited to workfare, On-the-Job Training, or work experience. Participation in a "work component" is limited in that the total hours of work required of members of a household cannot exceed the number of hours obtained by dividing the household's benefit level by minimum wage. Any other type of component is defined as a "non-work component." Participants in "non-work" components under the FSET program may be required to participate for up to 120 hours per month regardless of allotment size.
- o **Geographic areas covered and variations among local areas.** The areas where this particular component will operate should be summarized. A detailed map should be included in Part II Section B, "Geographic Coverage".
- o **Anticipated number of volunteers who will begin the component.** Food Stamp Program participants who volunteer for and begin a component, and who will not be sanctioned by the Food Stamp Program for noncompliance.
- o **Anticipated number of Notice of Adverse Actions (NOAAs) to be sent to mandatory participants who fail to comply with FSET requirement.** This should not include persons sent a NOAA for voluntary quit or any other program noncompliances.
- o **Target population.** Specify the criteria used to determine who is placed in the component (e.g., persons who have previously completed other components, non-English speaking, etc.). Indicate if applicants as well as participants are served.

- o **Level of participant effort, or number of hours of participant in the component and duration.** Component descriptions must specify level of effort for participants. FNS offers a level of effort comparable to 12 hours per month per participant for two months as a guideline for a meaningful component, but counties can propose other meaningful participation levels.
- o **Organizational responsibilities - service providers.** Indicate which agency operates which parts of the FSET Program (e.g., County, Employment Services, contractors, etc.).
- o **Cost of the component per participant, i.e., mandatory participants and volunteers who complete the component.** This figure will not be derived from the number of placements in the component because it should not include the number of persons sent an NOAA. Eliminating NOAAs provides a more realistic estimate of cost per person. Do not include participant reimbursement.
- o **Estimated amount of participant reimbursement to be paid to each participant who enters the component.** Include Federal and State share, and consider the average length of the component.
- o **Total cost of the component.** List costs with and without participant reimbursement. This cost should be the same as specified on Table 5, the Operating Budget.

B. Geographic coverage

This section should include a map that specifies where in the county FSET components will operate during the year covered by the Plan of Operations. Specific cities/towns, local agencies, districts, Indian Reservations, or any other relevant operational designation should be noted. If different components will operate in different locales, those variations should be specified.

E X A M P L E

- o Name of component: Job Club/Job Search
- o Description of component: This is a multifaceted intervention. Upon entry, participants are given a one-hour individualized assessment and an individualized development plan is written. This is followed by two days (six hours each) of classroom instruction on job search techniques, including interviewing, telephone technique, preparation for interviewing and good work habits. The next five days are spent in a phone room arranging interviews with prospective employers. Participants must make five documented job contacts a day in the subsequent three weeks, reporting to a case manager every other week.
- o Geographic areas covered: Job club will operate in Montgomery, Hillsdale, Fairfax and Abbeville. There is no local variation. The specified activities are provided in a standard fashion throughout the county.
- o Anticipated number of mandatory participants to begin component: 5,000.
- o Anticipated number of volunteers to enter component: 0.
- o Anticipated number of NOAAs for noncompliance with component: 200.
- o Targeted population: This is for persons who have participated in a job search component and have not found employment.
- o Level of participant effort: See above description of component.
- o Duration: Four weeks.
- o Organizational responsibilities: County contracts for provision of services.
- o Per participant cost of the component: \$200.
- o Per participant cost of participant reimbursement: \$25 for transportation (\$4,000).
- o Total cost of component: \$1,000,000 excluding reimbursement, \$1,100,00 including reimbursement.

PART II. PROGRAM PARTICIPATION AND EXEMPTIONS

A. Work Registrant Population

The county plan must include the following work registrant data:

1. The number of work registrants expected to be in the county as of October 1, 1992 through October 31, 1992;
2. The anticipated number of new work registrants to be added between November 1, 1992 and September 30, 1993;
3. The total number of work registrants in the county between October 1, 1992 and September 30, 1993.

This section should provide a clear explanation of the methods used to estimate the number of work registrants and the potential number of FSET participants (individuals, not placements). This section should include the method for obtaining the initial count of work registrants. Actual figures from the current fiscal year should be used whenever possible as a basis for projecting counts for FFY 1993. In addition, this section should explain whether the estimated number of work registrants is based on a duplicated or unduplicated count of individuals - that is, whether the county is able to track individual work registrants who register more than once during a fiscal year and intends to count that individual as a work registrant only one time during the fiscal year, or whether individuals will be counted as new work registrants each time they register during a fiscal year.

One part of the planning process is a careful analysis of the characteristics of the work registrant population and the potential FSET caseload. This type of analysis is helpful in determining the scale of program that is anticipated, as well as for deciding what types of services/components to provide. In addition, the data could be used to justify deferral criteria. If such analysis has been done, a summary of the characteristics of the work registrant population should be included in this section of the plan. The data should reflect the type of analysis used by the county to determine the composition of the FSET program chosen by the county. For example:

- o Number of work registrants for the last year.
- o Demographic characteristics of work registrants (e.g., age, household status, gender, special groups such as Native Americans, migrant workers, refugees).

The summary should note how the data were compiled (e.g., special survey, Food Stamp Job Search Program data, analysis of the Quality Control files, agency automated client record or certification system).

B. Deferral Criteria

1. This section of the county plan must include:

- Identification of county staff who will have authority to grant individual deferrals (e.g., eligibility worker, FSET staff, FSET supervisor, etc.).
- A description of the types of programs which will be utilized as substitutes for participation in FSET (MPP Section 63-407.23). Provide the estimated number of registrants deferred due to participation in such programs.
- A full explanation of the types of evidence that will be used to determine whether a deferral should be authorized.

2. Partial Geographic Exclusion Criteria and Justification

Part of a county may be geographically excluded. FNS has suggested that factors which might justify a geographic exclusion include lack of job opportunities, and remote location of job opportunities. Other factors which might be considered by FNS include lack of public transportation in the area, recent plant closures causing high unemployment and areas declared disaster areas. Lack of funds or conflict with GAIN are not acceptable reasons for requesting geographic exclusion.

Justification and documentation for the exclusion proposed must be included in this section of the plan. FNS will require strong justification. This may include but is not limited to the following:

- o Public transportation availability (e.g., public transportation is available on a fixed route only with limited operating hours, no inner-city transportation available).
- o Minimum round-trip travel time between unincorporated areas and the County Welfare Department.
- o Employment outlook.

3. Estimated participant Levels

This section of the plan must indicate what percentage of the county's total number of work registrants are expected to be included in the geographical and substitute program deferral categories and number of work registrants individually deferred from FSET participation. The format in Table 1 for FFY 1993 should be used.

4. Planned FSET Program Participants

In this section of the plan, counties should provide a summary of the FSET caseload expected to be subject to the program (i.e., those work registrants not deferred, volunteers who began a component, and those who do not live in geographically excluded areas) using the format presented in Table 2 for FFY 1993 estimates.

Table 1

Estimated Participant Levels
October 1, 1992 - September 30, 1993

A.	Total number of work registrants in county during the planned Federal Fiscal Year	_____
B.	List categorical deferral, and the number of work registrants deferred from FSET participation	_____
	1.	_____
	2.	_____
C.	List deferrals and the number of work registrants individually deferred from FSET participation	_____
	1.	_____
	2.	_____
	3.	_____
	4.	_____
	5.	_____
	6.	_____
	7.	_____
	8.	_____
D.	Total number of work registrants deferred from FSET (B + C)	_____
E.	Percent of all work registrants deferred from FSET (D divided by A)	_____
F.	Number of FSET mandatory participants (A - D)	_____

Table 2

Estimated FSET Placement* Levels
Fiscal Year 1993

- | | | |
|----|-----------------------------------------------------------------------------------|-------|
| 1. | Number of times mandatory participants are expected to begin a component. | _____ |
| 2. | Number of times volunteer participants are expected to begin a component. | _____ |
| 3. | Number of NOAAs which are expected to be sent for FSET noncompliance. | _____ |
| 4. | Total number of placements the county expects to make during the year (1 + 2 + 3) | _____ |

* This is to reflect a count of placements not participants. A participant may begin and participate in more than one component over the course of the year. Each time the participant begins a new component the county shall count it as a placement. However, if participation is not continuous (e.g., participation is interrupted by a disqualification), the participant may only be counted as placed at the time of initial commencement of the component.

PART III. PROGRAM COORDINATION

Part III of the county plan should describes two types of coordination: intra-agency (within the Food Stamp Program), and inter-agency (between the FSET Program and other agencies and programs).

A. Intra-agency Coordination

1. Narrative Coordination Statement. This narrative statement must include an organization chart and a client flow chart. The link between the following activities and the FSET Program should be described:
 - o Intake, application, and recertification.
 - o Work registration.
 - o Screening for FSET participation requirement.
 - o FSET component assignment.
 - o Monitoring compliance with component requirements.
 - o Determination of good cause.
 - o Conciliation. The FNS has issued new conciliation rules. Counties must use the current state rules until the rules are revised.
 - o Preparation of the Notice of Adverse Action.
 - o Sanctioning resulting from noncompliance with the FSET Program.
2. Information Coordination. This section of the plan should briefly describe how information will be coordinated and exchanged (forms, computer linkages, documentation of participant status and actions taken).

It is particularly important to describe the procedures established to assure that appropriate conciliation and sanction actions are taken within ten working days after learning of an individual's noncompliance with FSET requirements.
3. Coordination time frames. Any planned time frames associated with the FSET Program and the major Food Stamp Program functions should be described (e.g., how much time elapses between application for food stamps and referral into the FSET Program; between initiating a Notice of Adverse Action and actual imposition of sanctions).

B. Inter-agency Coordination

An important aspect of the FSET Program is that it should coordinate as closely as possible with other relevant programs and agencies to maximize the use of all resources to assist food stamp applicants and recipients to improve their employability and self-sufficiency.

This section of the county plan describes any proposed linkages between the FSET Program and other programs (such as JTPA and the GA Work Program), using the format presented in Table 3, and summarized here:

1. Areas of Coordination

- o Another agency delivers services in a FSET component.
- o The FSET Program and another program or agency jointly operate one or more components (e.g., integrated GAIN/FSET Job Search Workshops).
- o The FSET Program refers individuals to another agency or program for services (e.g., referral to public adult education classes for remedial education).
- o Other areas of coordination should be specified as appropriate in the county.

2. Coordinating Agencies or Programs

- o JTPA; GAIN; General Assistance Work Program; and/or other agencies or programs should be specified as appropriate in the county.

3. Methods of Coordination

- o Non-financial inter-agency agreements.
- o Contract for provision of services.
- o Joint Plans of Operations.
- o Coordinated local service delivery areas.
- o Informal referral procedures. (e.g., the FSET Program refers participants to JTPA).
- o Other methods of coordination should be specified as appropriate in the county.

Table 3

Summary of Interagency Coordination
for the FSET Program

<u>Area of Coordination</u>	<u>Agencies</u>	<u>Number of FSET Participants Expected To Be Served</u>	<u>Methods of Coordination</u>
1. Delivers a 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 FSET Program to another program or agency	_____	_____	_____
5. Other form of coordination	_____	_____	_____

PART IV. PROGRAM COSTS AND FINANCIAL MANAGEMENT

A. Planned Costs of the County FSET Program

The information provided in the following subsections of the Plan must indicate how the Federal FSET funds are being used and identify any use of state or county funds. If the County wants to provide services that cost more than the 100 percent Federal allocation, justification must be provided.

1. Sources of FSET Funds. This subsection shall estimate the total costs of the County FSET Program, and identify the source of funds, according to the funding categories. A format for providing this cost information is presented in Table 5, for planned FFY Costs for FFY 1993.
2. Operating Budget. This subsection shall include an estimate of the anticipated cost of each component included in the County FSET Program. A format is provided on Table 4, Operating Budget. The tables should be accompanied by a narrative description of all items.

Directions for Completing Table 4, Operating Budget:

- (1) Include the name of the component.
- (2) Include all county salary and benefit cost related to each component. Do not include contractor salary and benefit costs here. A contractor is any public or private entity that is providing FSET services under a financial or non-financial agreement with the county.
- (3) Include all other overhead costs to the county for each component. Do not include contractor overhead costs here.
- (4) Include approximate amount to be paid to each contractor for each component.
- (5) Include total dependent care reimbursement cost for each component.
- (6) Include the total participant reimbursement cost for transportation and other costs (excluding dependent care).
- (7) Include the county-only cost for dependent care services. (The amount that exceeds \$160 per dependent per month.)

- (8) Include the combined total cost for components listed.
 - (9) Include the overall County FSET operational costs not included under (2), (3), or (4) which are not associated with a particular component. This would include costs for assessing mandatory participants prior to assignment to a particular component. (Narrative must be included to justify cost.)
 - (10) Include the total of (8) + (9). This amount must equal Line 4 of Table 5, Planned Fiscal Year Costs.
3. Justification of Costs. Counties which plan to use Federal FSET funds for any education component or to request reimbursement for costs above the unmatched Federal grant must include a statement in this section explaining why such charges are appropriate.
- a. Justification of Costs Exceeding the FSET Grant. Counties requesting reimbursements in excess of the unmatched Federal Grant (other than for participant reimbursements) must explain the need for these funds (e.g., the breadth of services, the intensity of services, and the cost of services.) Costs in excess of the FSET grant can be allowed only with the prior approval of FNS and must be adequately documented to ensure that they are necessary, reasonable, and properly allocated.
 - b. Justification of Component Costs Exceeding 125 percent of the National Mean. Counties requesting Federal funding for components which exceed 125 percent of the National Mean cost for that component must justify the cost of their component. Counties should discuss in detail the reasons excess costs are projected. Items which account for the high costs might include the effectiveness or positive results attained, unique economic and geographic conditions, characteristics of the targeted population, and any other factors which would explain why costs in excess of 125 percent of the National Mean are warranted.

The FNS has given us the following average costs per component:

	Planned Component Costs Per Placement Averages	125 Percent Above Mean
Job Search	\$ 94	\$118
Job Club	\$147	\$184
Workfare	\$155	\$194
Voc. Training	\$173	\$216
Education	\$186	\$233

For components other than those listed, the above justifications should be included if costs exceed \$233 per placement.

4. Justification of Education Costs. Counties must explain the basis for any request for educational costs. This explanation should include a discussion of why such costs are attributable to the FSET Program and cannot be met through other existing education programs. Address whether the services being provided are available to persons other than FSET participants and if so, what is the cost for those persons.

5. Contractual Arrangements

If the county anticipates contracting out any portions of the FSET Program, this section of the County Plan should describe those contractual arrangements and briefly summarize the contract management approach that will be followed. Please provide: 1) the name and location of the contractor, 2) the amount of the contract, 3) the contract management approach that will be followed (e.g., performance-based contract, method of contract monitoring, auditing procedures, competitive procurement), 4) the basis for charging for contractual services, (i.e., will actual costs be claimed or a certain amount per activity?), and 5) the number of persons expected to be placed through the contract. FNS regulations require that copies of all contracts for FSET services be available for inspection at the county offices. The amount spent on contractual obligations is captured on Table 4 and the elements which comprise the total costs of the contract should be included in the county's narrative.

6. Participant Reimbursement

The county is responsible for reimbursing participants for expenses incurred in relation to FSET activities. Information on how many individuals are expected to need reimbursement and the amount of money individuals may need are to be included in Part I, Section A, Component Summary and on Table 4, Operating Budget.

Method of Reimbursement

Counties can choose between two methods for reimbursing participants for transportation: (1) reimburse actual expenses incurred, or (2) reimburse based on an average cost of expenses. This section of the plan should indicate which of the two methods the county has chosen. A reimbursement of actual expenses incurred is required for child care costs.

If the county wants to provide allowances to participants based on the average costs of participating in FSET, this section of the plan must also include an explanation of the method that will be used to determine average expenditures.

Participant expenses for transportation and costs other than dependent care shall be reimbursed by the county up to \$25 per participant per month with 50 percent Federal/35 percent State/15 percent County cost sharing (the Federal share shall not exceed \$12.50 per participant per month).

Expenditures for dependent care shall be reimbursed by the county up to \$160 per dependent per month with 50 percent Federal/35 percent State/15 percent county cost sharing (the Federal share shall not exceed \$80 per dependent per month and the state share shall not exceed \$56 per participant per month). Participants with monthly expenses that exceed the amounts above may not be required to participate.

The county may provide reimbursements above the \$25 and \$160, respectively, but Federal and State cost sharing is limited to the amounts specified above. Participant reimbursement is paid from a funding source which is separate from the 100 percent grant and 50 percent matched administrative cost funding sources.

A county may provide or arrange for dependent care services in lieu of providing reimbursements. The cost sharing would be 50 percent Federal/35 percent State/15 percent County up to \$160 per dependent per month (the Federal share shall not exceed \$80 per dependent per month and the State share shall not exceed \$56 per participant per month). If the county chooses this option, this section should describe the types of dependent care services to be provided (e.g., preschool, extended day care for school children, adult care for the elderly and infirm), a list of the service providers and where they are located, the cost of service on an hourly basis for each service provider and an estimate of the number of individuals to be served at each location.

The county should also include a description of the referral process to the service provider and a description of the payment process (e.g., the participant is provided a voucher which is given to the service provider at the time dependent care services are provided; the voucher is redeemed by the service provider on a monthly basis in the form of a bill to the county which identifies the number of individuals served and the total hours of services provided).

Realistic estimates of how many individuals are expected to need reimbursement (Part I, Section A, Component Summary) and the amount of money individuals may need (Table 4, Operating Budget) should be made. Counties should use actual spending for the current operating year as a starting point for future budget projections. In developing participant reimbursement estimates, counties should use projections of participation levels which take into account attrition and noncompliance by persons who are placed in components. If a county expects to refer 1,000 persons to an FSET component which is two months long, and the county spent an average of \$20 per participant per month in FFY 1992, a reasonable estimate for transportation and other costs might be \$32,000 (1,000 persons referred x 80% compliance rate = 800 persons x \$20/month = \$16,000 x 2 months = \$32,000). In determining dependent care costs, if a county expects that 50 percent of the 1,000 referrals will require dependent care services at the maximum of \$160 per dependent per month for an average of two dependents, a reasonable estimate for dependent care reimbursement might be \$256,000 (500 persons referred x 80% compliance rate = 400 persons x \$160 x 2 dependents = \$128,000 x 2 months = \$256,000).

Procedure for Reimbursement

Plans should also describe the procedures to be used for reimbursing participants. Counties may decide to provide up front allowances to participants or they may choose to reimburse them after the expenses have been incurred. If the participant must provide documentation of expenditures prior to reimbursement, this should also be discussed. If other agencies are given responsibility for providing reimbursements to participants, the Plan should explain how such costs will be reported.

7. Cost Allocation

If FSET is being administered in conjunction with other employment programs serving recipients of other forms of assistance the Plan shall address the basis for allocating costs. The plan should summarize how shared costs will be allocated among the pertinent programs. For example, if ten people are in a job club component and five of them are FSET participants 50% of the cost would be FSET cost.

Table 4
Operating Budget
Fiscal Year 1993

Components	State costs Salary & Benefits	Other State Costs	Contractual Costs	Participant Reimbursement <u>Dependent Care</u>	Participant Reimbursement <u>Transportation & Other Costs</u>	County Cost for Dependent Care services
First Component						
Second Component						
Third Component						
Fourth Component						
Fifth Component						
<u>Total</u>						

Total Component Costs: _____

Overall Operational Costs: _____

Total Costs: _____

Table 5

Planned Fiscal Year Costs of the State FSET Program by Category of Funding - FY 1993

	<u>Estimate of FY 1992 Expenditures</u>	<u>Fiscal Year 1993</u>
1. E&T Grant Funds (100% Federal):		
2. Additional E&T Expenditures:		
50% Federal:		
35% State:		
15% County:		
3. Participant Expenses Reimbursed:		
a. <u>Up to \$25 per month for transportation and other costs</u>		
50% Federal:		
35% State:		
15% County:		
b. <u>Up to \$160 per dependent per month for dependent care costs</u>		
50% Federal:		
35% State:		
15% County:		
c. <u>Above \$25 per month for transportation and other costs (optional)</u>		
100% County:		
d. <u>Above \$160 per dependent per month for dependent care costs (optional)</u>		
100% County:		
4. Total E&T Program Costs (1 + 2 + 3)		

For the Fiscal Year 1993 plan, include what Fiscal Year 1992 anticipated claims will be, based on actual expenditures as of the time of plan preparation.

V. TOTAL COUNTY GEOGRAPHIC EXCLUSION

This part of the plan should be completed by a county that believes its entire county requires a geographic exclusion.

In order to obtain FNS approval to exclude certain geographic areas, strong, specific justification regarding the impracticality of operating a program in that area must be provided by the county. For example:

- o "No public transportation and the private bus line is inadequate and costly. 90 percent of potential participants would need to travel over 80 miles to participate."
- o "Minimum round-trip travel time between unincorporated areas and the county is two hours."
- o Two thousand (2,000) employees have been affected in the past 12 months by closure of four major businesses."

A. Work Registrant Population

Please provide us with the number of excluded work registrants for FFY 1993. A summary of the characteristics of the work registrant population should also be included if available. Such characteristics include:

- o Number of FSET work registrants for the last FFY.
- o Demographic characteristics of work registrants (e.g., age, household status, sex, special groups such as Native Americans, migrant workers, refugees).
- o Program status (PAFS versus NAFS; AFDC status; GA status).

The summary should note how the data was compiled (e.g., special survey, analysis of the Quality Control file, county automated client record or certification system).

B. Exclusion Justification

Provide a narrative statement(s) about why your county should be excluded. Geographic exclusion requests will be judged on the circumstances of the area, not factors such as the county's ability to provide service in the area.

Counties must show that all available alternatives for service have been explored and that service to the work registrants proposed to be exempted is impractical. The FNS review will pay particular attention to the county unemployment level and demographic data provided to justify the county geographical exclusion. The factors to be considered in reviewing a request include, but are not limited to, the number of work registrants in the county, the unemployment rate, the number of employers in the county and any other indicators of the availability of jobs in the area under consideration. If service is impractical because of the seasonality of employment (i.e., employment opportunities are limited to summer resort related jobs), this should be noted. In general, counties with more than 500 work registrants and an unemployment rate less than 10 percent may not be excluded.

FSET PLANNING ALLOCATION
October 1, 1992 - September 30, 1993

<u>COUNTY</u>	<u>100% FEDERAL</u>	<u>PROGRAM 50/35/15 FED/STATE/CO</u>
Alameda	\$469, 394	\$105, 310
Alpine	739	166
Amador	4,739	1,063
Butte	67,057	15,044
Calaveras	9,703	2,177
Colusa	10,858	2,436
Contra Costa	139,009	31,187
Del Norte	13,364	2,998
El Dorado	17,497	3,926
Fresno	354,418	79,515
Glenn	11,726	2,631
Humboldt	43,790	9,824
Imperial	85,825	19,255
Inyo	6,849	1,537
Kern	257,637	57,801
Kings	57,068	12,803
Lake	28,815	6,465
Lassen	8,979	2,014
Los Angeles	2,248,984	504,565
Madera	43,586	9,779
Marin	24,188	5,427
Mariposa	6,498	1,458
Mendocino	36,028	8,083
Merced	88,121	19,770
Modoc	6,005	1,347
Mono	1,483	333
Monterey	117,009	26,251
Napa	12,017	2,696
Nevada	10,590	2,376
Orange	325,330	72,989
Placer	26,692	5,988
Plumas	4,799	1,077
Riverside	145,267	32,591
Sacramento	241,336	54,144
San Benito	15,223	3,415
San Bernardino	357,505	80,207
San Diego	319,691	71,723
San Francisco	194,952	43,738
San Joaquin	139,668	31,335
San Luis Obispo	32,486	7,288
San Mateo	39,244	8,805
Santa Barbara	85,721	19,232
Santa Clara	192,639	43,219
Santa Cruz	54,582	12,246
Shasta	61,282	13,749
Sierra	1,184	266
Siskiyou	19,375	4,347
Solano	38,416	8,619
Sonoma	46,354	10,400
Stanislaus	113,551	25,476
Sutter	29,397	6,595
Tehama	33,769	7,576
Trinity	6,273	1,407
Tulare	223,769	50,203
Toulumne	10,731	2,408
Ventura	122,496	27,482
Yolo	32,685	7,333
Yuba	35,243	7,907