

## DEPARTMENT OF SOCIAL SERVICES

744 P Street, Sacramento, CA 95814



June 14, 1999

ALL-COUNTY LETTER NO. 99-39

TO: ALL COUNTY WELFARE DIRECTORS  
ALL FOOD STAMP COORDINATORS

SUBJECT: FOOD STAMP EMPLOYMENT  
AND TRAINING PROGRAM  
PLAN FEDERAL FISCAL YEAR  
(FFY) 2000

REASON FOR THIS TRANSMITTAL

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

REFERENCE: ALL-COUNTY LETTER NO. 98-84

The purpose of this letter is to inform counties of the Food Stamp Employment and Training (FSET) planning process for FFY 2000. We are beginning the process earlier than in previous years to assure that the state plan is submitted on time to the United States Department of Agriculture (USDA). Please return your completed plan by July 30, 1999.

In developing their plans, counties should continue to take into account the work requirements which were established by the Personal Responsibility and Work Opportunity Reconciliation Act of 1996. In order to remain eligible for food stamps, non-exempt able-bodied adults without dependents (ABAWDs) are required to work 20 hours per week, participate in workfare or participate in a qualifying FSET activity for 20 hours per week. Federal law does not allow job club/job search, as a stand-alone component, to count toward meeting the 20-hour work requirement. Counties not participating in FSET only need to complete Table 1.

Counties may continue to combine elements of traditional FSET components with drug and alcohol rehabilitation. Such activities are allowable if they are not considered "medical," i.e., a course(s) of treatment provided by licensed physicians, psychologists, etc., intended to treat a diagnosed condition. Instead, to be countable, the drug and alcohol rehabilitation program must provide social and support services (discussion groups, general counseling, etc.) that can be directly linked to advancing an FSET participant's employment opportunities. If an individual requires treatment or specifies that they are medical in nature, as defined above, they would likely be considered good cause for an exemption from work requirements. Additionally, such activities must constitute only a minor portion of a component. For example, a county could require a maximum of one to five hours of participation in drug rehabilitation per week with the balance of the 20-hour requirement being met by attending a qualifying work activity.

The Balanced Budget Act (BBA) of 1997 permits states to exempt 15 percent of its total ABAWD population that is in danger of losing food stamp eligibility for failure to meet the work requirement. Each county agency may apply this exemption as it deems appropriate and determine the most efficient and effective manner in which to use the exemption. Attachment I indicates the number of additional exemptions counties can use each month. Counties are requested to describe

the criteria used to allocate the additional exemptions in their plan's cover letter.

#### Completion of Federally Required Tables

Due to questions asked by several counties, we are making the following clarifications:

- The Total Component amount in the small table at the bottom of Table 4 must equal the total of the first three columns in the large table, i.e., Salary and Benefits, Other Costs (Overhead), and Contract Costs.
- Federal MOE, State MOE and County MOE in the small table, are spread throughout the components in the large table.
- The Grand Total on Table 4 must equal the Grand Total on Table 5 for FFY 2000.
- The sum of Total Component and Assessment, in the small table at the bottom of Table 4, must be the same as the sum of rows 1, 2, 3, 4 and 5 on Table 5.
- Transportation/Ancillary on Table 4 must equal the sum of rows 6a and 6c on Table 5.
- Child Care in the small table on Table 4 must equal the sum of rows 6b and 6d on Table 5.

#### Funding for the FSET Program

Our preliminary estimate of California's share of FFY 2000 regular unmatched funding is \$10,770,603 and \$10,783,440 in supplemental unmatched funding (Attachment II). Participant reimbursement for child care and transportation (Attachment III) is matched by federal and state participation. Each participating county's FFY 2000 grant is based on its share of the statewide non-assistance food stamp caseload for calendar year 1998. Only counties which intend to satisfy all their MOE requirement may spend the supplemental funding and the state and federal MOE amounts. Expenditures beyond the unmatched funding are 50 percent county and 50 percent federal.

Counties can spend up to 100 percent of their unmatched grant allocation to serve ABAWDs in qualifying activities i.e., a workfare program or an allowable 20-hour per week work/training program. However, expenditures for non-ABAWDs and ABAWDs in non-qualifying activities, such as job club, cannot exceed **20 percent** of the 100 percent unmatched grant allocation. Any expenditure above 20 percent for non-qualifying components will be matched at the 50 percent county and 50 percent county rate.

The maximum reimbursement rates established October 1, 1998 by the BBA are still in effect. Recognizing the uncertain level of compliance with various work requirements among the ABAWD population, USDA has set two levels for the reimbursement rate—one level for filled work slots and the other for unfilled or “offered” work slots. A slot is “filled” for the month a participant reports to a work or training site to begin his or her work activities and each

month he/she remains in that activity. A slot is "offered" when a bona fide workfare or training opportunity is made available to a participant (i.e., the participant is told to report to a work site at a given date and time) but the participant either refuses the assignment or does not report as directed. In the case of self-directed workfare programs, the USDA will reimburse counties only for filled slots.

The following rates are established for FFY 2000 :

Offered work slots:	\$30
Filled work slots:	\$175

The USDA will determine each counties reimbursement amount by multiplying all the offered slots by \$30 and all the filled slots by \$175. The result is the maximum amount that will be reimbursed with 100 percent federal funds. Expenditures above the maximum amount are eligible for 50 percent federal reimbursement.

If you have any questions about this All County Letter, please have your staff contact Tony Pyara at (916) 657-2630. Questions concerning your allocation should be directed to the County Contracts and Financial Analysis Bureau at (916) 657-3806.

Sincerely,

**Original Document Signed By  
Bruce Wagstaff on 5/14/99**

BRUCE WAGSTAFF  
Deputy Director  
Welfare to Work Division

Enclosures

c: CWDA  
CSAC