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DIRECTOR

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**DEPARTMENT OF SOCIAL SERVICES**

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EDMUND G. BROWN JR.  
GOVERNOR

REASON FOR THIS TRANSMITTAL

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

August 9, 2011

ALL-COUNTY INFORMATION NOTICE NO. I-46-11

TO: ALL COUNTY WELFARE DIRECTORS

SUBJECT: FEDERAL FISCAL YEAR 2012 PLAN TEMPLATE, POLICY GUIDELINES AND ALLOCATIONS FOR COUNTIES PARTICIPATING IN THE CALFRESH EMPLOYMENT AND TRAINING PROGRAM

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

This letter transmits the Federal Fiscal Year (FFY) 2012 county CalFresh Employment and Training (E&T) plan template, policy guidelines, and 100 percent fund allocation for the E&T program. In accordance with provisions of federal and state regulations, counties who want to participate in E&T must submit a completed E&T plan for inclusion in California's statewide E&T plan [7 CFR 273.7 (c)(6) and California Department of Social Services (CDSS) Manual of Policies and Procedures (MPP) Section 63-407.842].

The deadline for submitting your county's E&T Plan is **September 26, 2011**. Please note that counties who fail to submit their plan by this date will be denied participation in the E&T program during FFY 2012 and their E&T allocation will be re-distributed among participating counties. This deadline is essential in order for CDSS to meet federal time parameters for completing the state E&T plan.

For FFY 2012, California has been granted a federal E&T allocation of \$6,612,035. CDSS will withhold \$808,000 to cover state administrative costs and to provide workers' compensation coverage for program participants. The remaining \$5,804,035 will be distributed among participating counties.

Twenty-eight counties have indicated their intent to operate an E&T program in FFY 2012. E&T funds have been distributed among these counties based on their average monthly caseload. Please refer to the attached list, which shows the distribution of the federal E&T grant among the participating counties.

If the cost of a county's E&T program exceeds its 100 percent federal allocation, the county will receive a federal reimbursement for 50 percent of additional allowable expenditures. 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.

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

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

The E&T template for FFY 2012 (Enclosure 1) has been updated for greater clarity and accuracy. Counties must complete all sections and tables within the template. If certain optional provisions of the E&T plan are not relevant to the county's E&T program, the county should indicate that these provisions are not applicable. The FFY 2012 template must be used for plan completion and all previous versions of the template should be disregarded.

A clear understanding of E&T terminology, funding rules, and participation requirements is essential in preparing a state-approved E&T plan and effectively administering an E&T program. Therefore, we have attached updated and expanded policy guidelines for use by counties as they design and administer E&T (Enclosure 2). The guidelines cover a variety of subjects and are provided to help counties gain a more accurate understanding of the requirements. It is strongly recommended that county staff review the policy guidelines, including the program definitions, prior to or concurrent with the completion of their E&T plans.

In preparing their E&T plans, it is important that counties provide reasonably accurate estimates of their work registrant and ABAWD populations for FFY 2012. Data sources for preparing these estimates may include county generated reports, manual counts, and numbers previously reported by the county on the following forms:

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

Data tables for the STAT 48 and STAT 47 can be found at <http://www.dss.cahwnet.gov/research/> under CalFresh and then under CalFresh Data Tables.

Counties are reminded that FNS utilizes the data from the STAT 47 and 48 forms to determine each state's future allocation of E&T funds. Therefore, it is essential that these reports be completed accurately and timely. Please note that CalFresh recipients who are exempt from work registration on October 1 of the federal fiscal year who subsequently lose their exemption status and either apply for, or continue to receive CalFresh benefits should be included in the count of new work registrants during the year. This includes CalWORKs recipients who have reached their time limit and persons whose youngest child reaches the age of six.

The template accompanying this ACIN is a PDF file and is strictly for informational purposes. Counties will receive a Microsoft Word version of the template for actual use in preparing their plans. The Microsoft Word version of the template will be e-mailed to counties immediately following issuance of this ACIN. Counties 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 Kristin Brinks, Manager of the Employment and Special Project Unit, at [kristin.brinks@dss.ca.gov](mailto:kristin.brinks@dss.ca.gov). The contact information should include the name, title, address, telephone number, fax, and e-mail address of the individual who will be responsible for preparing the E&T plan.

Please forward an electronic copy of your E&T plan in Microsoft Word and subsequently mail a signed hard copy to:

ATTN: Kristin Brinks, Manager  
CalFresh Employment and Training Program  
California Department of Social Services  
CalFresh Branch  
744 P Street, M.S. 8-9-32  
Sacramento, CA 95814

If you have questions regarding the STAT 47 or STAT 48 reports, please contact Bobbi Swetland of the Data Systems and Survey Design Bureau at (916) 653-1322. If you have any questions about this letter or the submission of your plan, please contact Robert Nevins, CalFresh E&T Analyst, at (916) 654-1408, or Kristin Brinks, Manager, at (916) 654-1435.

Sincerely,

***Original Document Signed By:***

LINDA PATTERSON, Chief  
CalFresh Branch

Enclosures

<b>County</b>	<b>Average Monthly Caseload 12 Months</b>	<b>% to Total</b>	<b>FSET 100 % Federal Grant Allocation</b>
ALAMEDA	42,652	0.048930	283,991
ALPINE	73	0.000084	488
GLENN	936	0.001074	6,234
HUMBOLDT	6,131	0.007033	40,820
KERN	37,848	0.043419	252,005
LOS ANGELES	340,311	0.390397	2,265,878
MARIN	3,938	0.004518	26,223
MARIPOSA	550	0.000631	3,662
MENDOCINO	5,519	0.006331	36,745
MONTEREY	11,595	0.013302	77,205
NEVADA	1,643	0.001885	10,941
ORANGE	53,582	0.061468	356,762
PLACER	5,301	0.006081	35,294
RIVERSIDE	66,845	0.076683	445,071
SACRAMENTO	58,421	0.067020	388,986
SAN DIEGO	71,557	0.082089	476,447
SAN FRANCISCO	24,806	0.028457	165,165
SAN JOAQUIN	13,249	0.015199	88,216
SAN LUIS OBISPO	6,249	0.007169	41,609
SAN MATEO	3,710	0.004256	24,702
SANTA BARBARA	9,096	0.010435	60,565
SANTA CLARA	32,191	0.036929	214,337
SANTA CRUZ	7,600	0.008719	50,605
SHASTA	8,222	0.009432	54,744
SONOMA	11,064	0.012692	73,665
STANISLAUS	25,477	0.029227	169,635
TRINITY	565	0.000648	3,761
VENTURA	22,570	0.025892	150,278
<b>TOTALS</b>	<b>871,701</b>	<b>100.0000%</b>	<b>\$5,804,035</b>

CalFresh Employment and Training (E&T)  
County Plan Template and Instructions

COUNTY PLAN COVER SHEET  
(To be completed by counties offering E&T in Federal Fiscal Year (FFY) 2012)

County of:
Prepared by:
Title:
Telephone:
Fax:
E-mail:
Date Submitted:

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

The due date for submission of county E&T plans to CDSS is **September 26, 2011**. County E&T plans will not be reviewed or approved unless they are submitted using the FFY 2012 E&T template.

PART I  
SUMMARY OF COUNTY E&T PROGRAM

Part I of the county E&T plan summarizes the E&T program that the county plans to implement. In this section, you will provide a narrative description of your county's E&T program. Please respond to each of the following requests for information:

- A. Program Changes** - Describe the nature of the changes being made to the E&T program.
- B. Program Components** – List the county's E&T components (do not describe the components). If a county offers job retention, it should be listed in this section and described in Part II.
- C. Sequencing of Components and Concurrent Assignments** - If it is intended that a person 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 the assignment of a participant to multiple components at the same time.
- D. Other Related Employment Programs** - Identify other employment programs such as General Assistance (GA), CalWORKs, and county-run programs; and explain how these programs interface with E&T.
- E. Workforce Development System** – Identify those E&T components that will be offered through the county's Workforce Investment Act (WIA) one-stop centers and explain how they will be delivered. Discuss the means by which the county will provide components not offered through the system.
- F. Outcome Data** - Provide any E&T outcome data available to the county such as numbers of participants entering employment, types of employment found, wage rates, etc.

PART II  
PROGRAM SUMMARIES AND E&T PARTICIPATION COUNTS

Note: Prior to completing this part, counties are encouraged to read the definitions of E&T program components contained in the attached policy guidelines.

**A. Component Summaries**

In this part, counties must provide a detailed and clearly written description of each E&T component being offered in FFY 2012. Components will only be approved if required activities and hours of participation are consistent with federal and state E&T requirements. County-specific acronyms should first be spelled out prior to their use throughout the plan.

In completing this section, counties must remember the following:

- Assessment by itself is not a component/activity.
- Screening is not a component/activity.
- Hours of participation in a workfare, self-initiated workfare, or work experience component are determined by dividing the household's monthly CalFresh allotment by the higher of the federal or state minimum wage.
- 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/Substance Abuse Services.
- The maximum number of hours that can be required of an E&T mandatory participant is 30 hours per week or 120 hours per month. E&T volunteers are not subject to the 120 hour limit.
- If anti-drug, anti-alcohol and mental health discussions are offered, these activities must be described in the component summary(s) for the primary component(s) to which they are linked. For example, if generalized anti-substance abuse discussions are offered as part of vocational training, a description of these services must be included in the component summary for this activity. **Note: Consistent with recently released federal policy instructions, anti-substance abuse and mental health services funded with E&T dollars are limited to those activities described in the E&T Components Section of the FFY 2012 Policy Guidelines.**
- If job retention services are included in the county's E&T program, a complete description of these services must be provided using a component template with corresponding cost entries included on Table 1.
- If an E&T component is a voluntary component, CalFresh sanctions must not be imposed for failure to comply with participation requirements. Language must be included in the component description which identifies the component as volunteer and clarifies that sanctions are not imposed for noncompliance.

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

1. Component Name- List the name of the component.
2. Component Description- Provide a detailed description of the E&T component. The component description should identify such things as the activities that comprise the component, the sequence of activities if the component is multi-faceted, time frames for component participation, specific tasks performed by the participant as part of his/her participation in the component, and the types of

reimbursement and services provided to assist participants in effectively satisfying participation requirements. Please be specific.

3. Participation Requirements- Identify the length of the component and the weekly/monthly participation requirements. If the component involves more than one activity (e.g., job search and workfare), identify the participation requirements for both activities and explain whether these activities are offered sequentially or concurrently.
4. Organizational Responsibilities- Identify the various entities involved and their respective roles in administering the component. Organizational responsibilities include such things as conducting assessments of participants' skills and needs, providing participants with instruction and training through one on one and group settings, monitoring and tracking E&T participation, making good cause determinations, and issuing notices of disqualification.
5. Geographic Areas Covered- Identify the areas of the county where the component will be operative.
6. Targeted Populations- Identify who among the CalFresh population is targeted to participate in the component.
7. Anticipated Number of Able-Bodied Adults without Dependents (ABAWDs) Who Will Participate Each Month. This count includes both new and existing ABAWD participants expected to be in the component each month. - \_\_\_\_\_
8. Anticipated Number of Non-ABAWDs Who Will Participate Each Month. This count includes both new and existing non-ABAWD participants expected to be in the component each month. - \_\_\_\_\_
9. Total Number of Persons Who Will Participate Each Month (7+8) - \_\_\_\_\_
10. Annual Component Participation [monthly total (9) multiplied by 12] - \_\_\_\_\_
11. Annual Cost of Component Administration (This number must be the same as Table 1 Column D)- \$\_\_\_\_\_
12. Average Cost Per Participant Per Month for Component Administration [annual cost of the component (11) divided by annual component participants (10)]- \$\_\_\_\_
13. Total Number of Participants Who Will Be Reimbursed for Transportation/Ancillary Services Each Month [This number must not exceed the participant total in (9)]. This count includes both new and existing participants expected to receive a reimbursement each month. - \_\_\_\_\_

14. Total Number of Participants Who Will Receive Reimbursements for Transportation/Ancillary Services During The Year [monthly total (13) multiplied by 12] - \_\_\_\_\_
15. Annual Cost of Transportation/Ancillary Services and Types of Services Provided- If this number is 0, the county must explain how participant transportation needs and expenses are addressed in Part V, Section (B, entry 1). (This number must be the same as Table 1, Column F)- \$\_\_\_\_\_
- If ancillary expenses such as books, tools, or work clothing are provided for participants in a component please describe the reimbursable ancillary expenses.
16. Average Cost Per Participant Per Month for Transportation/Ancillary Services [annual cost for participant reimbursements (15) divided by annual number of persons reimbursed (14)]- \$\_\_\_\_\_
17. Total Number of Participants Who Will Be Reimbursed for Dependent Care Each Month [This count includes both new and existing participants expected to receive a reimbursement each month and must not exceed the participant total in (9)] - \_\_\_\_\_
18. Total Number of Participants Who Will Receive Dependent Care Reimbursements During The Year [monthly total (17) multiplied by 12] - \_\_\_\_\_
19. Annual Cost of Dependent Care [This number must be the same as Table 1, Column E]- \$\_\_\_\_\_
20. Average Cost Per Participant Per Month for Dependent Care [annual cost for dependent care (19) divided by annual number of persons reimbursed (18)] - \$\_\_\_\_\_

## **B. E&T Participation**

This section asks for both an annual count of component placements and an individual count of E&T participants. Do not complete this section for each component summary, but base placement counts on cumulative data from all component summaries. In completing Section 1 (Estimated E&T Component Placements), counties should base their calculations on annual participant counts for all components in Section A of this part. Section 1 is a duplicate count as a participant is counted as placed for each month of participation in an E&T component. An ABAWD who participates for three months in workfare would receive three placement counts. The count is further duplicated as participants are counted for each qualifying component in which they are placed. If the ABAWD who participated for three months in workfare also participates for three months in education, that same individual would receive three additional placement counts.

Qualifying components are those which satisfy the ABAWD work requirement and consist of workfare, self-initiated workfare, work experience, education, and vocational training. Non-qualifying components are those which do not satisfy the ABAWD work requirement and consist of job search and job club components with the exception of those offered under WIA or the Trade Act of 1974.

## 1. Estimated E&T Component Placements

- a. Identify the estimated number of all ABAWD placements in qualifying components for the year. Count each ABAWD as placed for each month of participation in each qualifying component. Remember that additional placements are counted if the same ABAWD participates in more than one qualifying component.
- b. Identify the estimated annual number of all component placements not included in item a. Count each individual not identified in (a) as placed for each month of participation in each E&T component. This includes ABAWDs placed in non-qualifying activities and non-ABAWDs placed in any E&T component. Remember that additional placements are counted if the same individual participates in more than one activity.
- c. Identify the estimated annual number of all placements for the fiscal year (a+b).

## 2. Estimated Individual Participation

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

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

### Part III

#### WORK REGISTRANTS, ABAWDS, AND E&T DEFERRALS

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

- The Annual Work Registrant and CalFresh Employment and Training (E&T)

## Program Caseload Report (STAT 48)

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

Data tables for the STAT 48 and STAT 47 can be found at the following two websites:  
<http://www.cdss.ca.gov/research/PG359.htm>  
<http://www.cdss.ca.gov/research/PG360.htm>

Counties are encouraged to review the above data reports and definitions provided in the E&T policy guidelines prior to preparing their estimates.

### A. Work Registrant Population

Please be as accurate as possible in developing these estimates. This may require the use of multiple sources. Use data from the current federal fiscal year, whenever possible, in formulating the projections.

Work Registrant Counts - Estimate the following:

- a. The number of work registrants in the existing CalFresh caseload expected to be in the county on October 1, 2011 (Part A, entry 1 of the STAT 48 form).
- b. The anticipated number of new work registrants to be added between October 1, 2011 and September 30, 2012.

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

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

### Unduplicated or Duplicated Work Registrant Count

To the best of their ability, counties are required to give an unduplicated count of work registrants. Individuals included in the work registrant count on October 1 should not be included in any subsequent count of work registrants for the remainder of the year. In addition, individuals certified for CalFresh or registered for work more than once in a 12-month period should only be reported as a work registrant once during that 12-month period.

- a. Indicate whether the count of work registrants is unduplicated or duplicated.

- b. Identify the sources for preparing work registrant estimates and note any methods employed to eliminate duplicate counts.

**B. Deferral Policy**

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

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

Reason For Deferral	Number of Work Registrants Deferred
(a) lacks dependent care	
(b) lacks transportation to an E&T Program site	
(c) lives an unreasonable distance from the E&T program site	
(d) has a severe family crisis	
(e) temporarily unemployed and expected to return to work within 60 days	
(f) involved in legal difficulties	
(g) has a temporary illness or disability	
(h) Other	
(i) total number of deferred work registrants [add (a) through (h)]	

- 2. Re-evaluating Deferrals - 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. Counties are reminded that for FFY 2012, the entire state of California is under a waiver of the ABAWD work requirement.

- 1. ABAWD Counts - Estimate the following:

- a. The number of ABAWDs in the existing CalFresh caseload expected to be in the county on October 1, 2011.
  - b. The anticipated number of new ABAWDs to be added between October 1, 2011 and September 30, 2012.
  - c. The total number of ABAWDs in the county between October 1 and September 30 of the fiscal year (a+b=c).
2. Unduplicated or Duplicated ABAWD Count

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

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

#### D. Meeting Ongoing Federal Reporting Requirements

Counties are advised to read the policy guidelines issued with this template before completing this section.

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

### PART IV PROGRAM COORDINATION

A. General Program Coordination – In this part, clearly describe how the E&T program relates to other processes in the CalFresh Program.

1. Narrative Coordination Statement - Describe in narrative form the linkages between the following CalFresh functions and the E&T program:
  - Intake, application, and recertification;

- Work registration;
  - Screening for E&T participation;
  - E&T 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 (e.g., forms, computer linkages, hard copy reports, and e-mail exchanges). Include a description of the intake and disqualification processes, including the procedures established to ensure that appropriate disqualification actions are begun within ten days following a determination of no good cause.
  3. Coordination Time Frames – Describe time frames associated with the E&T program and the major CalFresh Program functions (e.g., how much time elapses between application for CalFresh and referral into the E&T program and between a finding of noncompliance and initiation of a notice of disqualification).
- B. Interagency Coordination – The E&T program should be coordinated as closely as possible with other relevant programs and agencies to maximize the use of all resources to assist CalFresh applicants and recipients in improving their employability and self-sufficiency. Describe the linkages between the E&T program and other programs.
1. Areas of Coordination – Identify agencies or programs that E&T is linked to and explain how the programs are linked together. Agencies or programs with which the E&T program has linkages may include the Employment Development Department (EDD), community colleges, vocational education agencies, adult education schools, social service agencies, CalWORKs Welfare-To-Work, one-stop centers established under the Work Investment Act (WIA), and the county's GA program.
  2. Methods of Coordination - Specify the methods of coordination between E&T and the agencies/programs identified in Item 1 above. Methods of coordination may include non-financial interagency agreements, contracts for provision of services, joint plans of operation, and informal referrals to other agencies or programs.
- C. Contractual Arrangements – If the county anticipates contracting out any portions of the E&T program, provide a narrative description of the county's contractual arrangements. List the various contractors, the services they will provide, and the cost of each contract. Please be specific and thorough in the description of services to be provided. All contracts must be maintained by the county and be available for review by CDSS and FNS upon request.

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

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

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

Note: Placement counts are duplicated as a participant is counted as placed for each month of participation.

<u>E&amp;T Administration</u>	<u>Agencies Involved</u>	<u>Annual Number of E&amp;T Placements Expected</u>	<u>Methods for Delivering Services</u>
Delivers an E&T component			
The E&T program delivers a service for another agency or program			
Joint component of the E&T program and another agency or program			
Referral of individuals from the E&T program to another program or agency			
Other forms of coordination (specify)			

PART V  
PROGRAM COSTS AND FINANCIAL MANAGEMENT

Note: Approval of the county's estimated E&T budget does not constitute approval for the release of funds. Approval and release of E&T funds to the county is contingent

upon issuance of a County Fiscal Letter providing the county's E&T allocation and submission of the County Expense Claim, which must reflect actual allowable expenditures.

#### A. Planned Costs of the County E&T Program

1. Operating Budget - Provide a narrative description of the costs of the E&T program identified on Table 1. The narrative should include such things as the number of positions represented by the cost for salary and benefits, examples of E&T overhead expenditures, the types and number of contracts used to deliver E&T services, and the various transportation and ancillary services that will be provided to E&T participants.

Costs are allowed only with approval from CDSS and must be adequately documented to ensure that they are necessary, reasonable, and properly allocated to the E&T program. If the county plans to use interagency agreements involving a transfer of funds to another agency of the county government, address the basis of charges for CalFresh participants and the method for monitoring the agreements.

2. Justification of Education Costs - Federal E&T funds, whether 100 percent or 50 percent reimbursement matching funds, must not be used to supplant non-federal funds being used for existing services and activities. Thus, counties are prohibited from using federal E&T funds to pay for education services if such services can be funded with state and local dollars. Counties may use federal E&T funds to operate an approved education component only to the extent that E&T component costs exceed the normal cost of services provided to students not participating in E&T.

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

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

## 1. Type of Participant Reimbursement

- a. Identify those transportation, ancillary and dependent care expenditures for which participants are reimbursed with E&T dollars.
- b. If E&T funds are not used to pay for the cost of transportation, explain how participants are reimbursed for transportation costs incurred while participating in E&T.
- c. If the county chooses to provide or arrange for dependent care services, describe the services to be provided (e.g., preschool, extended day care for school children, adult care for the elderly and infirm).

## 2. Method of Participant Reimbursement

- a. Explain whether the county will reimburse participants based on the actual cost of participation or based on some other method developed by the county.
- b. If the county wants to provide allowances for transportation and costs other than dependent care based on the average costs of participating in E&T, describe the method to be used in determining average expenditures.

## 3. Procedure for Participant Reimbursement - Counties may provide up-front allowances, or they may reimburse participants for actual expenses.

- a. Clearly describe the procedure to be used for reimbursing participants. If counties typically provide reimbursements after expenses have been incurred, explain what steps are taken to enable the participant to begin his or her E&T assignment (e.g., up front bus tokens or advance payments are provided at the time of component placement).
- b. Explain how costs will be reported if other agencies are given responsibility for providing reimbursements.

## C. Cost Allocation

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

PART VI  
PLAN CONTACT INFORMATION

In this section, counties shall provide the names and contact information for those persons in the county who have primary responsibility for gathering work registration and ABAWD data, completing the E&T plan, and preparing E&T financial reports and claims. Use the following table to summarize E&T contact information. Please ensure that all entries are completed.

Person responsible for work registrant and ABAWD reporting.	Person responsible for preparing the E&T plan.	Person responsible for E&T financial analysis.
Name:	Name:	Name:
Title:	Title:	Title:
Department/Agency:	Department/Agency:	Department/Agency:
Phone Number:	Phone Number:	Phone Number:
Fax:	Fax:	Fax:
E-mail address:	E-mail address:	E-mail address:

Part VII  
E&T BUDGET FOR FFY 2012

The following two tables capture the county's E&T budget for FFY 2012. Table 1 breaks out county expenditures by E&T component and Table 2 breaks out expenditures by funding source (i.e., federal and county dollars).

Instructions for Completing Table 1

1. Do not use decimals or fractions on either table.
2. The grand total on Table 1 must equal the grand total on Table 2.
3. Use actual spending for the current operating year as a starting point for future budget projections, not the levels projected in previous county E&T plans.
4. If two or more activities are offered concurrently, separate all of the costs appropriately between the activities.
5. For each component where assessment costs are applicable, those costs must be included in the Salary & Benefits column of the appropriate component.

TABLE 1

OPERATING BUDGET

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

TABLE 2: FFY 2012 PLANNED COSTS BY FUNDING CATEGORY

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

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

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

### **Introduction**

The purpose of this document is to provide policy guidelines, definitions and clarifications for use by counties in the preparation of their CalFresh Employment and Training (E&T) plans and the operation of their E&T programs. Counties are advised to read this document prior to preparation of their E&T plan. They are also advised to read the federal E&T funding questions and answers, which were transmitted to counties via All County Information Notice (ACIN) I-50-07, dated September 28, 2007.

### **E&T Plan Submission and Modifications**

Counties offering E&T must submit a plan that describes their E&T program and identifies the estimated costs associated with administering the program and reimbursing participants for the costs of products and services necessary for program participation. In order to be approved, all county plans must be prepared using the template designed by the California Department of Social Services (CDSS) for the 2012 Federal Fiscal Year (FFY).

If a county proposes to make any substantive change to its E&T program after their E&T plan for FFY 2012 is approved, the county must submit a plan modification to CDSS. The modification request must be approved by CDSS before the proposed change(s) may be implemented. The county may be liable for costs associated with the implementation of any change that occurs prior to approval by CDSS and FNS. The following are examples of changes that require a formal modification of the county E&T 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 E&T grant level for which the county will request 50 percent federal reimbursement;
- Change in the method of paying participant reimbursement.

To submit a plan for modification to CDSS, the original plan must be edited and submitted using either the track changes method or the strikethrough and underline method. A cover letter must be attached describing the proposed change(s). Counties must be careful to ensure that appropriate amendments are made to all parts of the plan impacted by the proposed change. The county may want to contact CDSS for assistance in determining those sections within its E&T plan that will be affected by the proposed modification.

Some changes to the county E&T 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 Able-Bodied Adults Without Dependents (ABAWDs) to recipients of General Assistance (GA)] 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. E&T plan revisions should be reported to CDSS in a timely manner in order for CDSS to maintain accurate records to report to FNS as needed.

### **Maintaining a Cohesive E&T Program**

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

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

### **E&T Funding**

#### *Overview*

Each state receives an annual 100 percent federal allocation to administer its E&T program. In California, this allocation is distributed among those counties that have chosen to participate in E&T based on their average monthly caseload. Counties who wish to spend additional dollars administering their E&T program can receive federal reimbursement for 50 percent of their administrative costs. FNS also reimburses 50 percent of allowable expenditures for participant reimbursement.

Financial information is reported on a county expense claim and includes claims for the 100 percent federal grant, 50 percent matched administrative funding, and 50 percent matched participant reimbursements. The claim is due 30 days after the end of each federal fiscal quarter. Counties complete financial tables within their E&T plan which break out their proposed budget based on the cost of each component and based on

the amount of federal and county dollars that will be spent on E&T administration and on participant reimbursements.

### *Allowable Administrative Costs*

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

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

### *Participant Reimbursements*

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

Transportation in the form of bus tickets, monthly bus passes, or gas vouchers;  
Dependent care;  
Work clothing and uniforms;  
Tools and other necessary equipment;  
Minor vision correction (such as eyeglasses, bifocals, eye exam);  
Basic dental work (such as teeth cleaning);  
Minor automobile repairs; and  
Legal services;  
Test fees;  
Union dues; and  
Licensing and bonding fees.

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, whichever is lowest. The CWD may provide reimbursements above established dependent care limits, but such costs must be paid for with the 100 percent county funds.

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

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

### *E&T Funding Limitations*

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

- Determining whether an individual must be work registered;
- Screening during the certification process;
- Disqualification activity that take place after noncompliance without good cause is reported;
- Subsidizing a participant's wages;
- Reimbursing participants for dependent care or transportation/ancillary costs (these E&T costs should be budgeted and claimed to the specific county expense claim code provided for these expenses)
- Goods and services for private use;
- Outstanding debts;
- Entertainment costs that are primarily for amusement or social activities; and
- Fines, legal fees, and penalties for failure to comply with federal, state, or local laws.

### *Funding Requirements for E&T Education Components*

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

- Federal funds—whether 100 percent or 50 percent reimbursement—made available to operate an education component must not be used to supplant non-federal funds being used for existing services and activities. Federal funds may only be used to operate an approved education component to the extent that E&T component costs exceed the normal cost of services provided to students not participating in E&T.
- Costs not charged to the general public cannot be charged to the E&T program. Nor, can these costs be used to draw down a federal 50 percent reimbursement for administration of an E&T education component.

- Federal funds can be used to pay for some education activities and support services offered through community colleges, as long as these services are above and beyond those offered to non-E&T students or offered at cost. These activities and services must be described in the county's E&T plan and are subject to review and approval by FNS. Tuition, case management and other support services are allowable costs and can be paid for with federal and county dollars.

All other sources of funding for education must be explored, including other educational grants such as the Pell grant but excluding student loans, before E&T funds are used for tuition. Tuition must be the same for E&T participants as it is for students not participating in E&T.

### **E&T Components**

An E&T program shall include one of the components listed below. Counties have the freedom to offer a single component, a sequence of components, and specific components can be established for various E&T target populations. A county can mandate participation in E&T components, establish components for volunteers, or offer a mixture of mandatory and voluntary activities.

Assessment- A county must assess a client's skill level, aptitude, interests and supportive service needs in order to determine what, if any, will be the most effective E&T component for that client. Assessment is not itself an E&T component, but it is the first activity which should be performed in preparing an individual for E&T participation. The design and extent of the assessment process will vary from county to county. Counties should clearly describe their assessment process in their E&T plan.

Even though it is not a component, assessment is an allowable E&T expense. The cost of conducting an assessment should be included in the administrative budgets for the E&T program

An assessment can be conducted in a variety of ways. Counties could require individuals to complete a one or two page form consisting of questions to be completed by the client. Or, a county may assign the client to a case worker who can assess the client in person. A county could also partner with other related programs/offices such as Workforce Investment Act (WIA) One-Stop Career Centers, or non-government agencies which can provide a more comprehensive assessment. Many local workforce investment boards have extensive resources that can assist counties in the assessment process.

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

Education, including literacy level;  
Communication skills, including English proficiency;

Employment history, skills, abilities and interests; and  
Barriers to employment and steps necessary to overcome these barriers.

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

**Job Search** – In this component, participants make a pre-determined number of inquiries about employment opportunities to prospective employers over a specified period of time. The component may be designed so that the participant conducts his/her job search independently or within a group setting. Methods for monitoring compliance with job search include written reports submitted by participants as well as random phone calls. Some counties offer job search as a stand-alone activity while others combine it with other E&T components, such as job club. Job search components should entail at least 12 contacts with employers per month for two months.

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

**Vocational Training** - This component is designed to improve the employability of E&T participants by providing training in a skill or trade that allows the participants to move directly into employment. Examples of providers of vocational training activities include community-based organizations, adult schools, community colleges, the WIA, Private Industry Council programs, and Regional Occupational Programs. For the purpose of federal E&T funding requirements, vocational training is considered education.

**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 those education components that establish a direct link to job readiness will be approved.

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

The primary goal of workfare is to improve employability and encourage individuals to move into regular employment while returning something of value to the community. As part of the workfare component, the CWD may establish a job search period of up to 30 days prior to sending the registrant to a workfare site.

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

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

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

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

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

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

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

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

Hours devoted to anti-substance abuse and mental health improvement discussions should not exceed those dedicated to other aspects of the component that do not deal directly with its main thrust. For instance, in a job search component requiring 20 hours participation per week, basic discussions and the dissemination of information designed to help participants overcome substance abuse or mental health issues must be less than ten hours per week. If a job club component covers job search, interview preparation, dress, hygiene, etc., then the substance abuse or mental health discussion should take up no more time--and probably significantly less--than the other activities.

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

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

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

## **Mandatory Participants, Volunteers, and County Target Populations**

### *Deferrals and Mandatory Participants*

Within the work registrant population, certain persons are temporarily excused or “deferred” from participation for reasons that include those listed at MPP Section 63-407.811. Counties can create additional deferrals beyond those in E&T regulations such as a deferral based on homelessness. Work registrants who are not deferred are

defined as mandatory E&T participants. However, a county is not required to serve all mandatory participants.

### *Target Populations*

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

The most common target population is CalFresh work registrants who are also recipients of GA. Counties define participation in their GA employment and training program as participation in E&T. This provides a vehicle by which counties can use E&T dollars to pay for the costs of running their GA work components since these components are also E&T components. Other target populations include, but are not limited to, persons living in a particular geographic area within the county, persons in need of adult basic education or training in English as a Second Language (ESL) classes, or employable ABAWDs.

A county can have more than one target population and establish specific components for specific target groups. For example, a county might target CalFresh recipients in receipt of GA. GA recipients who have minimal employability skills might be assigned to job club followed by job search. Those unsuccessful in locating employment might be placed in workfare. Employable GA recipients with a greater work history might be targeted to participate in a structured work experience component lasting three months. The same county might target persons with limited English proficiency and assign these individuals to adult basic education and training in English as a Second Language (ESL).

### *Volunteers*

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

### **Work Registration and ABAWD Populations**

As part of their E&T plan, counties must include estimates of the number of work registrants and ABAWDs expected to be in the county during the relevant fiscal year. In

developing their estimates of work registrants and ABAWDs, it is essential that counties have an accurate understanding of those CalFresh recipients who should be included in these populations.

Counties should remember the following in preparing their plan estimates:

- The work registrant population is the largest population captured in the plan.
- The ABAWD population is a subset of the work registrant population. ABAWDs and work registrants are not distinct unrelated groups, but the ABAWD population is a smaller population within the work registrant population.
- There are always fewer ABAWDs in the county than there are work registrants because additional exemptions have been established for the ABAWD work requirement, which are not included in the list of work registration exemptions.

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

Persons who do not qualify for an ABAWD exemption are counted as ABAWDs even if they reside in a county with an ABAWD waiver (the entire state of California is under an ABAWD waiver for FFY 2012) or are granted the 15 percent exemption. Such persons are not considered exempt from the ABAWD work requirement.

### **Relationship of the E&T Plan to the Stat 47 and Stat 48 Reports and the County Expense Claim**

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 E&T 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 provides a starting point for counties to use in developing estimates for the next year's E&T plan.

Unless the county anticipates significant changes in the size and characteristics of its CalFresh population or the number of persons to be served in E&T, estimates for the number of work registrants and ABAWDs identified in the E&T plan should not differ significantly from those reported on the Stat 47 and 48 forms. However, counties are reminded that the estimates of work registrants and ABAWDs contained in the E&T plan should be based on unduplicated counts. Currently, the ABAWD count on the Stat 47 is a duplicated count, but CDSS plans to revise the form so that the numbers for work registrants and ABAWDs are both unduplicated. Counties will be informed when these revisions have been completed. Until then, the current Stat 47 report must be used.

The STAT 47 report is due 15 business days after each fiscal quarter ends, and the STAT 48 report is due on November 15<sup>th</sup> of each year. Data from these reports is used by CDSS to provide data to FNS on the number of work registrants and E&T program participation by non-ABAWDs and ABAWDs as well as utilization of the 15 percent ABAWD exemption. FNS in turn utilizes work registrant and ABAWD data to determine the annual amount of E&T 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.

## **Program Definitions**

**ABAWD** – An ABAWD is a non-assistance CalFresh recipient between the ages of 18 and 49 who does not qualify for one of the ABAWD exemptions listed in MPP Section 63-410.3 (see list below). CalFresh eligibility for ABAWDs is limited to any three months in a 36-month period (a three-month time limit) unless the individual meets the ABAWD work requirement (see definition below).

**ABAWD Exemptions** - Persons are exempt from the ABAWD work requirement if they are exempt from CalFresh work registration (see list of work registration exemptions below). Individuals are also exempt if they are:

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

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

**ABAWD Waiver** - The 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. For FFY 2012, the entire State of California is under a waiver of the ABAWD work rule.

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

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

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

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

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

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

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

Deferred - This term refers to a work-registered person or persons temporarily excused by the county from mandatory participation in the E&T program. A list of deferrals is contained in MPP Section 63-407.811 and includes lack of transportation, lack of dependent care, living an unreasonable distance from the E&T component site, family crisis, and temporary illness. Counties can also establish their own deferrals.

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

E&T Component - A service, activity, or program which is designed to help CalFresh recipients gain skills, training, or work experience that will increase their ability to obtain regular employment and achieve self-sufficiency.

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

Hours of participation in a workfare, self-initiated workfare, or work experience component are limited to the number obtained by dividing the household's monthly CalFresh allotment by the higher of the applicable federal or state minimum wage. In California, the current state minimum wage of \$8.00 per hour is higher than the federal minimum hourly wage of \$7.25. Persons who voluntarily participate in E&T are not subject to this hourly limit.

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

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

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

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

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

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

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

Workforce Development System - An interconnected strategy for providing comprehensive labor market and occupational information to job seekers, employers, providers of one-stop delivery of core services, providers of other workforce employment activities, and providers of workforce education activities. Each component of a county's E&T 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 Registrant - A non-assistance CalFresh applicant or recipient who does not meet one of the work registration exemptions at MPP Section 63-407.21 (see list below). Work registrants are subject to CalFresh work registration requirements at MPP Section 63-407.4.

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

- Younger than 16 years of age or 60 years of age or older;
- 16- or 17-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 six or an incapacitated person;
- Receiving or has applied for unemployment insurance benefits;

- Participating in a drug or alcohol treatment program that prohibits employment of 30 hours or more per week;
- Employed or self-employed at least 30 hours per week or receiving weekly earnings at least equal to the federal minimum wage multiplied by 30 hours;
- Half-time school attendance.

Work Registrant Requirements - As a condition of CalFresh 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 E&T 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
- Not voluntarily quit a job of 30 or more hours a week or reduce work hours to fewer than 30 hours a week without good cause.