

DEPARTMENT OF SOCIAL SERVICES

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November 10, 1986

ALL-COUNTY INFORMATION NOTICE No. 1-107-86

TO: ALL COUNTY WELFARE DIRECTORS
ALL COUNTY GAIN PROGRAM COORDINATORS

SUBJECT: COUNTY PLAN INFORMATION (GAIN)
INFORMATION ON NOVEMBER UPDATE

The purpose of this notice is to convey several items that should receive particular attention in the development of county GAIN plans (Section A) and to provide information on the November GAIN Plan Update (Section B). The state has received sixteen county plans to date; nine counties have had their GAIN plans approved. As the preparation and review of GAIN plans has taken place, several plan requirements have repeatedly needed to be reiterated and/or clarified. This notice will serve to address these issues as well as provide additional planning information.

A. COUNTY GAIN PLAN INFORMATION

To assist counties in the preparation of the county plans, guidelines on the completion of county plans were released in March. The guidelines stress the county welfare department's responsibility to work closely with local service provider agencies and programs, and to detail the level of that coordination in the county plan. The service provider agencies that must be included in the planning process are: Local Community Colleges, County Offices of Education, JTPA Service Delivery Areas, Employment Training Panel, Child Care Resource and Referral Agencies, and other agencies and organizations such as local school districts, refugee organizations, business and service provider groups and recipient advocates.

Review of plans to date indicates that there are several areas that have required clarification and/or revision. Included in these is the need for linkage of the participant needs assessment, labor market needs assessment, and the specific educational and training programs which will be utilized and/or need to be developed. The participant needs assessment must indicate the current education, skills, and employment experience levels of recipients who will be participating in the program. The labor market needs assessment must indicate the specific education and skills necessary to qualify for the occupations which are likely to provide employment opportunities. The educational and training programs which will be provided, or need to be developed, must reflect those services necessary to provide participants with the education and skills necessary to meet the occupational competencies necessary to qualify for identified occupations. In order to more closely align participants and labor market needs,

the following information must be included: (1) the type of entry-level occupations in demand; (2) the specific training that would be provided to enable participants to qualify for the identified occupations; (3) existing training and education resources and the extent to which they will be utilized, including existing funding sources and amounts available for GAIN participants; (4) existing utilization of resources by AFDC recipients who will become GAIN participants; and (5) additional resources and funding necessary to provide for necessary services not currently available.

Other areas which typically need greater clarification and specificity when developing the County Plans are:

- o Counties need to not only delineate the number of staff assigned to the GAIN Program, but also their specific duties and responsibilities. In addition, counties need to specify their workload assumptions which support the number and classification of staff requested.
- o Child Care Needs Assessment Information must clearly state the total capacity of child care resources available in the County, the child care resources needed to meet GAIN goals, and how the County plans to address any unmet needs. It is important that counties not overestimate the number of child care slots actually available, assume that all providers will accept children up to their full licensed capacity, or assume that all vacant slots are available for GAIN participants. Results of participant surveys indicate high levels of preference for in-home or licensure-exempt day care. It is important for the CWD to discuss and provide the client with information on licensure-exempt situations as well as licensed day care and the pros and cons of each; however, the client should not be pressured into use of licensed care only. Experience to date has shown that Resource and Referral Agencies are not willing to assume responsibilities for working with licensure-exempt day care providers. Consequently, welfare departments need to be aware of a potential need for an internal administrative capability to make payments to and evaluate the appropriateness of licensure-exempt day care.
- o The County Plan must identify the current amount and percentage of JTPA funding available for GAIN participants, and insure that local JTPA organizations are servicing an appropriate number of GAIN participants. At a minimum, JTPA must continue to serve the same level of AFDC participants as were served prior to the implementation of GAIN, however, GAIN planners should make every reasonable effort to increase the number of GAIN participants served by JTPA.
- o Counties have consistently equated the number of participants without high school diplomas or GED certificates with the number of participants who will require basic education services. It is not necessarily true that all participants without a high school diploma will need to participate in remedial education. Estimates of the number of participants who will be referred to this component should

be based on program policy defined in ACL 86-82. Those counties that determine their local school districts are at their ADA cap and additional funding for basic education is needed must apply JTPA 8 percent funds to the need to offset the need for GAIN funds. The level of participation of AFDC recipients, who are likely to be GAIN participants, in educational programs under ADA prior to the implementation of GAIN should also be determined and factored into county funding requests.

- o All County Plans must detail the coordination efforts that have occurred with local service providers. Counties need to make sure that coordination of services among service providers have been discussed and agreed upon prior to the submission of the County Plan.

In addition, we are requesting that the County identify a contact person for information regarding data collection activities. Data collection should be consistent with State-released data collection requirements. County EDP requests must go through the regular County Approval Section approval process. Counties will be expected to provide program data manually pending implementation of EDP systems.

B. PROGRAM IMPLEMENTATION DATES

There appears to be some continuing confusion related to projected county program start dates in relation to the County Plan/Budget Proposal submittal date. Program regulations include nonregulatory handbook information (MPP 42-720.52) indicating that SDSS will respond to the initial County Plan/Budget Proposal within 90 days of its receipt. "Response", as used in this context, should not be construed to indicate approval to commence program operations. The Department's goal continues to be to get each county's GAIN program into operation as quickly as possible. It has been our experience that numerous factors can cause delays in this Department's approval process and county's ultimate start date. These factors include, but are not limited to, state and county staffing resources, the number of county plans under review, and the need to revise plans subsequent to review. Consequently, county plan and budget proposals should be based on a start date from 120 to 150 days subsequent to submittal of the plan for approval. This will allow sufficient time to resolve plan and budget issues and will provide a more realistic start date for purposes of planning and coordinating efforts with other agencies. The SDSS program and fiscal staff continue to be committed to assist counties in the development and successful implementation of the GAIN program.

Formal approval of implementation expenditures (e.g., staff development, acquisition of space, increased staffing levels and equipment purchases) cannot be assumed until all information requested by this Department has been provided, analyzed and an implementation allocation approved. These allocations would normally not be retroactive; the county should allow sufficient time to respond to any state concerns and state review of that response. Planning staff levels will be continued after plan submittal.

The following clarifications regarding the completion of the Budget Proposal are also provided:

1. As stated previously, personal counseling cannot be funded out of GAIN program funds. Manual of Policies and Procedures Section 42-750.5 specifies the GAIN participant "...shall, to the extent available (emphasis added), receive necessary counseling or therapy to help him or her and his or her family adjust to his or job or training assignment". Therefore, personal counseling services may be provided to the extent counties have existing funding (e.g., county services block grant) available. No costs should be entered in the Budget Proposal, Section V-Program Component Costs, Part 4-Supportive Services, line 8. However, if the county anticipates personal counseling services will be provided, the funding source should be indicated in Section VIII of the Budget Proposal, which requests information regarding other funding sources.
2. Manual of Policies and Procedures Section 42-750.24 specifies that "child care shall be available for a transition period of three months" for GAIN participants who obtain unsubsidized employment after having participated in the program. Child care is the only supportive service fundable during the transition period. Therefore, no other costs should be entered in the Budget Proposal, Section V-Program Component Costs, 90-Day Transition-Page 42b, Part 4-Supportive Services, Lines 4 through 8.
3. Child care cost estimate assumptions need to be clearly stated in the plan. The number of hours required must be consistent with the child's school attendance and the parent's participation in a GAIN component. If the child/children are in a regular school program during part of the day, we would expect counties to exclude those hours in the calculation of day care services needed. For example, a parent participating in a 9:00 a.m. to 2:00 p.m. Job Club/Job Search workshop, whose children are in an 8:00 a.m. to 3:00 p.m. school program would have no day care need.
4. Transferability of funds:

Many counties have raised questions about the extent to which the approved allocation can be transferred between cost areas within a component as well as between components. Due to the different funding sources (and the different Federal Government sharing ratios related to those sources) involved in the GAIN program and due to the need to assure the approved allocations are within appropriation limits, restrictions on transferability of funds are necessary. Additionally, the budget act language for 1986 imposes controls on the transfer of child care supportive service funding. Therefore, it is important that counties thoroughly plan their funding request by component.

The transfers specified below will be allowed without prior DSS approvals. However, any other transfers would require advance approval; approval would not occur until year-end adjustments were made.

a. Transferability Within Areas of a Component

1. Full transferability of the allocation will be allowed within a component among program delivery areas (i.e., CWD overhead, CWD staff, CWD staff development and direct client contracts, excluding supportive services).
2. Full transferability of the allocation will be allowed within a component between transportation supportive services and ancillary supportive services. Either of these allocations can be transferred to cover child care supportive services. However, the child care allocation cannot be transferred to cover other supportive services within a component.
3. Limited transferability of the allocation will be allowed between program delivery areas and supportive services within a component. Program delivery funding can be transferred to cover any supportive service expense within the same component. However, supportive services funding cannot be transferred to cover program delivery area expenses.

b. Transferability Between Components

1. Full transferability of the allocation (with the restrictions under a. above) will be allowed among Title IVA funded components. These components are Job Club, Job Search, Short- and Long-Term PREP and Grant Diversion (which includes OJT funded by Grant Diversion, Supported Work and Transitional Employment). Any information received from the Federal Government which amends this list of Title IVA funded components will be forwarded as soon as possible.
2. Other than those components discussed in b.1, no transferability of the allocation will be allowed to, from or between WIN Demo (Title IVC) or General Fund components. Any transfers in these components would require prior DSS approval.

c. NOVEMBER UPDATE GUIDELINES

The normal "November Update" will not be required this year. Only two of the eight counties will have sufficient operational experience in time to complete an update process by November 1, 1986. The Department is currently developing a budgetary update process which will require fiscal updates beginning in January 1987. The budgetary update process will be released in a separate letter.

Counties which began program operations prior to October 1, 1986 must submit a program activity summary by December 1, 1986. The summary must include a brief analysis of program accomplishments and problems, as well as any other information deemed appropriate by the county. We suggest that the summary include information on the following areas:

- 1) Program impact on AFDC caseload and grant levels.
- 2) Analysis of caseload by component in relation to original county caseload projections.
- 3) Brief analysis of contractor performance.
- 4) Expenditure projections in relation to original cost estimates.
- 5) Update on changes in the participant and labor market needs assessment.

Counties whose plans have been approved contingent on inclusion of additional information in the November update must include that additional information. Should the county propose any program changes, these must also be detailed in the update (MPP Section 42-720.22). Counties are reminded that the county Board of Supervisors must approve the annual update and conduct public hearings whenever the county plan is revised significantly (MPP Section 42-720.412).

To assist in plan preparation, we have attached a basic checklist of essential questions which each original plan must address prior to approval.

Any questions or comments on the GAIN plan may be addressed to the GAIN Implementation Bureau at (916) 324-6962. Questions or comments on the budget proposal should be directed to the County Administrative Expense Control Bureau at (916) 322-5802.

Sincerely,

Carl B. Williams

CARL B. WILLIAMS
Deputy Director
Employment and Community
Services Division

Robert T. Sertich

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Deputy Director
Administration

Attachment

cc: CWDA

GEN 654a

GAIN PLAN CHECKLIST

The following represent the most frequently requested information in SDSS responses to county GAIN plans. This checklist does not include all issues and concerns that should be addressed in the plan, however, it is representative of areas which have generally required plan modification. The GAIN Plan Checklist is structured to coincide with the format suggested in the GAIN County Plan Guidelines.

I. Board of Supervisors Approval

- A. Does the plan include evidence of County Board of Supervisors approval?
- B. Does the plan show evidence that a public hearing was held?
- C. Does the plan include a brief description of the public testimony received at the hearing(s) and the response(s) given?

II. Executive Summary (optional)

- A. The Executive Summary may include information pertaining to a county's coordination effort or a general description of its county GAIN Plan. On occasion this information has been inconsistent with the body of the plan.

III. Statement of Employment Goal

- A. Does the plan include the statutory goal of unsubsidized employment for GAIN participants?
- B. Does the plan clarify what assumptions were made to project employment rates out of GAIN components?

IV. GAIN Program County Organization

- A. Does the plan include all proposed staff?
- B. Are the functions and responsibilities of each staff person clearly delineated?
- C. Does the plan include a brief description of the CWD GAIN organization and its relationship to other county programs and administrative support units as well as contract agencies?

V. Participant Needs Assessment

- A. Does the plan state the methodology used to develop the assessments?
- B. Does the plan list the sources used including CWD case files, characteristics, studies, MIS reports or other county data?

- C. Does the plan state when the study was conducted?
- D. Does the plan describe the employment, training and supportive services needs of the potential GAIN population?
- E. Are target populations identified in the plan and listed in order of priority?

VI. Child Care Needs Assessment

- A. Is there evidence in the plan that the child care needs assessment was developed in cooperation with the local child care resource and referral (R&R) agencies?
- B. Does the plan include a description of how the CWD coordinated its efforts with the R&R and identify any other sources of child care information used?
- C. Does the child care needs assessment encompass all geographic areas within the county?
- D. Does the plan assess all types of child care available to county residents including care in a child's own home?
- E. Does the plan describe the types, amounts and location of existing child care resources?
- F. Does the plan describe the methodology in arriving at the child care needs?
- G. Does the plan address the projected need for child care?
- H. Does the plan compare the existing child care resources to participant child care needs?
- I. Does the plan describe what the process and goals for expanding child care availability are?

VII. Labor Market Needs Assessment

- A. Does the plan include an evaluation of the current and projected employment prospects?
- B. Does the plan include a methodology for a detailed annual labor market survey?
- C. Does the plan identify the needed training to meet the current and projected labor market needs?
- D. Does the plan establish clear linkage between the participant characteristics, labor market needs, and training and education services which will be provided?

VIII. Inventory of Available Services

- A. Does the plan emphasize those services which would appropriately be used for the GAIN program in order to provide the education, training, and support services necessary to enable participants to competitively participate in the labor market?
- B. Does the plan include a description of the availability of specific services and include current capacity, usage and vacancies?
- C. Does the plan describe the cooperative working relationship with existing resources that have been developed?

IX. Projected Unmet Service Needs

- A. Does the plan project unmet services needs by comparing the participant, child care, and labor market needs assessment?
- B. Does the plan provide a description of the types of service provider contracts and procurement methods that the CWD intends to use?
- C. Does the plan include specific plans, targeted dates and activities necessary to continuously identify and develop needed resources?

X. Delivery of Services

- A. Does the plan include a narrative description and flow chart of participant flow through the program?
- B. Does the plan delineate the functions and responsibilities through each program process, i.e., assessments, employment plan development, ongoing case management?
- C. Does the plan clearly describe: (1) the role and responsibilities of CWD and contract agencies in relation to participants; (2) the services provided by contract agencies; and (3) the administrative processes, procedures, and coordination of services between the CWD and its contractors?

XII. Grievance Procedure

- A. Is there a grievance procedure established by the County Board of Supervisors consistent with statutory and regulatory requirements?