

DEPARTMENT OF SOCIAL SERVICES  
744 P Street, Sacramento, CA 95814



JUN 26 1989

ALL COUNTY LETTER NO. 89-57

TO: ALL COUNTY WELFARE DIRECTORS  
ALL COUNTY GAIN COORDINATORS

SUBJECT: IMPLEMENTATION OF THE JOB OPPORTUNITIES AND BASIC  
SKILLS (JOBS) TRAINING PROGRAM UNDER THE FAMILY  
SUPPORT ACT (FSA) OF 1988

REFERENCE: ALL-COUNTY INFORMATION NOTICE (ACIN) I-109-88,  
I-12-89, I-20-89, AND LETTER DATED 5/26/89 TO ALL  
COUNTY WELFARE DIRECTORS AND ALL COUNTY GAIN  
COORDINATORS REGARDING JOBS IMPLEMENTATION UPDATE

Attached is an advance draft copy of the emergency regulations for implementation of the Job Opportunities and Basic Skills (JOBS) Training Program pursuant to the Family Support Act (FSA) of 1988. This regulation package supersedes both the draft version that was mailed to Counties in our JOBS implementation update letter dated May 26, 1989 and the version shared at the regulations training held in Sacramento on June 15, 1989.

Our intent is that these emergency regulations will be filed with the Secretary of State with an effective date of July 1, 1989; however, as you know, the effective date of JOBS implementation is contingent also on timely approval of the State Plan and passage of new State legislation (AB 2171). As of this writing, we cannot confirm the July 1 implementation date; however, you will be notified by telephone by your GAIN and Employment Services Operations analyst as soon as we know whether or not implementation of JOBS will actually begin on July 1, 1989.

Pending this final notification to Counties, we are providing at this time only the most pertinent information which Counties will need in the event we are able to start on July 1, 1989. Most of this information was shared with Counties at the County regulations training session of June 15, 1989; however, this will confirm and update those discussions.

#### Phase-in of New Mandatory Caseload

The Department of Social Services (SDSS) will not require that Counties phase-in the new JOBS mandated participant groups prior to January 1990. Prior to that date, new federally mandated participants may enter the program if the participants request inclusion. As part of the November Plan update, Counties will be

required to describe their process and timetable for phasing-in new JOBS mandated participant groups.

### Estimates of New Caseload

To determine the impact of the new mandatory caseload, the SDSS is requesting that each County submit an estimate of the number of AFDC recipients who will be newly mandated participants in GAIN as a result of these changes and who are not already phased-in or included in 89/90 phase-in estimates. This information would be used as a factor in determining how to complete any allocation changes resulting from the amount appropriated in the final State budget. We would appreciate receipt of this information no later than July 21, 1989.

New JOBS mandated participants include:

- o Parents, including second parents in AFDC-U cases, whose youngest child is age three, four or five;
- o Parents under age 20, without a high school diploma, regardless of the age of their children.

In addition, we would appreciate an explanation of how you arrived at these estimates.

### Status Change for Volunteers

Effective with JOBS implementation, some individuals exempt from registration who are currently volunteer registrants will become mandatory. It will be necessary for these individuals to be notified of their status change. For sanctioning purposes, individuals will be considered volunteer participants until they have been notified that they are mandatory. Affected individuals should be notified at their next regularly scheduled GAIN appointment; all affected individuals must be notified by December 31, 1989.

When notifying the affected individuals, Counties must:

- Give the individual a copy of the revised GAIN 24 (you will receive it in a separate All County Letter (ACL) which transmits the revised forms) and verbally review the applicable law/regulation changes with the individual.
- Give the individual a copy of the revised GAIN Guidebook (you will receive it in a separate ACL) and verbally review the changes in the Guidebook with the individual.

- Explain to individuals who are parents of a child age three through five that they cannot be required to participate more than 20 hours per week. However, if they agree to participate for more than 20 hours per week, the agreement must be documented in the case file (this participation restriction does not apply to custodial parents under age 20 who do not have a high school diploma).
- Explain to the individual that, effective with the status change, he/she will be subject to financial sanctions in instances of non-compliance without good cause.

### Treatment of Money Management and Sanctions

The Department of Health and Human Services has denied our money management waiver request. Therefore, effective July 1, 1989, money management will no longer be a part of the GAIN Program. We recognize there are many questions regarding the transition from current conciliation/sanction procedures to the new procedures. We are developing policy in these areas and will provide you information as soon as possible. We expect that participants already in money management will not be removed.

### County GAIN Plans

Counties will be required to revise their current GAIN Plans to make them consistent with the statutory and regulatory changes required to implement the JOBS Program. This process should be initiated as soon as possible and revisions must be submitted to the SDSS as part of the currently mandated GAIN Plan November update process. Counties are not required to submit JOBS related GAIN Plan revisions prior to November 1989. To the extent that there is a conflict between the current County GAIN Plan and statutory and regulatory changes, Counties must comply with statute and regulations.

Current GAIN regulations (42-720.2) require that each County submit a GAIN Plan update in November of each year. The GAIN Plan components which must be updated include, but are not limited to the participant needs assessment, labor market needs assessment, program design and service delivery system changes, and inventory of services. As part of this process, Counties must review current Plans in relation to regulatory and statutory changes; identify all inconsistencies and complete the necessary Plan revisions. The SDSS will issue an All County GAIN Coordinators Letter by August 1, 1989 with additional specific instructions and guidelines on GAIN Plan update requirements. Pending receipt of this information, Counties should use the GAIN Plan Guidelines issued on March 7, 1986 as a guide in determining GAIN Plan update content.

Current GAIN regulations require that the GAIN Plan November update be approved by the County Board of Supervisors. If the changes in the County GAIN Plan reflected in the November update are limited to those items required to comply with JOBS, SDSS will not require a public hearing. However, SDSS strongly recommends that each County conduct a public hearing as a means of informing the general public and/or interested parties of the changes in GAIN Plans required by implementation of JOBS.

### Fiscal Year (FY) 1989/90 GAIN Allocations

In order to provide Counties with funds to operate GAIN for Fiscal Year (FY) 1989/90 as soon as possible, SDSS will complete the allocation development process now underway without regard to the impact of JOBS. Any allocation changes resulting from the amount appropriated to GAIN in the final State budget will be made as soon as possible after the budget is enacted.

### Forms

An ACL transmitting copies of interim new/revised forms, activity agreements, notices, etc., to be used effective with the July 1, 1989 implementation of JOBS is under final Departmental review. An advance draft of the ACL was distributed at the regulations training session. We anticipate that the ACL will be mailed to be received by Counties before July 1, 1989.

### Fiscal-Related Issues

Information regarding specific time study and administrative claiming instructions as a result of implementing the JOBS Program on July 1, 1989 will be included in the regular County Fiscal Letter (CFL) letters for the July-September 1989 quarter. It is anticipated that the CFL for time study instructions for all programs will be issued in mid-July. To the extent that the time study or fiscal claiming procedures are revised as a result of JOBS, the Department will attempt to issue County GAIN allocations using formats which are consistent with these revisions. However, allocations may be issued in a pre-JOBS format if the administrative activities necessary to make fiscal claiming, time study, and allocation formats consistent would delay allocations beyond July 30, 1989. In that event, allocation formats will be revised later in the fiscal year.

### Statistical Reporting

We are in the process of determining the federally mandated statistical reporting requirements. At a minimum, we expect to be required to capture data concerning the Federal target groups.

Therefore, the only change we currently plan to make to the GAIN statistical reporting system for the July 1, 1989 implementation effort is to add data on the targeted population to the GAIN 26 and the GAIN 31 Quarterly Characteristics Report.

Target groups are defined as individuals who are:

1. Currently receiving AFDC and have received AFDC for any 36 of the 60 preceding months.
2. Applying for AFDC and have received AFDC for any 36 of the 60 months immediately preceding the month of application.
3. Custodial parents under age 24 who have not completed high school or equivalent education and are not enrolled at time of application; or have little or no work experience in the preceding year.
4. Members of a family in which the youngest child is within two years of being ineligible for AFDC because of age.

Specific instructions regarding the identification and tracking of these targeted populations will be issued in an ACL as soon as possible.

### County Approvals

Since JOBS is a mandated program, software changes under \$25,000 can be made without prior approval. A quarterly notification of these projects will be required. For software changes over \$25,000 and all County activities to convert from a manual process to an automated process, prior written approval is required. An ACL will be issued to Counties outlining JOBS automated data processing approval requirements within the next few weeks.

Note: Turner Automated System Standards are not dependent on a set amount of expenditure for equipment or software. Counties should review the Automated Triggers and County Standards outlined in ACL 86-57 and ensure that any changes meet the Turner standards.

### Tier 1 Counties

Tier 1 Counties should not change to the new GAIN 26 form until they receive revised forms from MDRC. These are expected by mid-July. In addition, Tier 1 Counties should include the new mandatories in random assignment. MDRC will be contacting Tier 1 Counties individually to clarify procedures.

As mentioned earlier, this ACL is intended to provide only the most essential information necessary for Counties to begin planning for implementation on July 1. Clarification on regulations and other implementation issues that were unanswered at the training session will be addressed in communications to follow.

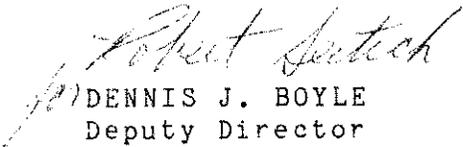
Questions regarding the information in this letter should be referred to the appropriate individuals as designated below:

Fiscal-Related Issues: Patt Moore, (916) 445-7046.

Statistical Reporting: Anthony Armenta, (916) 323-4942.

County Approvals: Faye McGirr, (916) 323-6218.

For questions regarding all other information in this letter, please contact your GAIN and Employment Services Operations analyst at (916) 324-6962.

  
DENNIS J. BOYLE  
Deputy Director

Enclosures to County GAIN Coordinators only.

cc: CWDA