

**Senate Bill 1041 Implementation
Field Monitoring
Visit Summary**

Imperial County

Visit Date: June 25, 2014

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES
Welfare to Work Division
Todd R. Bland, Deputy Director

Imperial County
Senate Bill (SB) 1041 Implementation
Field Monitoring Visit Summary

Executive Summary

Purpose of Field Monitoring Visit

The purpose of the Senate Bill (SB) 1041 implementation field monitoring visit is to obtain information regarding the county's progress in implementing program changes enacted by SB 1041 (Chapter 47, Statutes of 2012).

Scope of Field Monitoring Visit

Specifically, the California Department of Social Services (CDSS) will review how each County Welfare Department (CWD) implemented SB 1041 program changes, including but not limited to:

- New Welfare-to-Work (WTW) participation requirements;
- WTW 24-Month Time Clock;
- Reengagement of the short-term young child exempt population (Assembly Bill [AB] X4 4 group);
- CWD staff knowledge of SB 1041 changes;
- Training provided to staff in order to implement these changes; and
- Any pertinent data related to these program changes that are available.

Goals of Field Monitoring Visit

The CDSS' goals are to ensure that SB 1041 is being implemented correctly by each CWD, to gather promising practices in regards to implementation, to share these promising practices (when able) amongst all CWDs throughout the State, and to determine whether systematic or program issues relating to the integration of SB 1041 changes into the existing California Work Opportunity and Responsibility to Kids (CalWORKs) and WTW program exist throughout the state. If such issues exist, they will be addressed by the SB 1041 Oversight Workgroup.

County Visit General Information

This one-day field monitoring visit was performed on Wednesday, June 25, 2014 at the Imperial County Department of Social Services office in El Centro, California. The field monitoring visit team included three staff from the CDSS, WTW Division, CalWORKs Employment and Eligibility Branch along with the Imperial County Department of Social Service's Director, Deputy Director of CalWORKs/WTW, related Program Managers, and county caseworkers (Social Workers). The field monitoring visit consisted of a kick-off meeting, close-out meeting, staff and administrator interviews, and case management observations with county staff.

Implementation Strategies

Imperial County's implementation strategy consisted of a comprehensive approach to inform staff of SB 1041 related program changes which included class room style training and the creation of various comprehensive job aids. Question and Answer Sessions, refresher, and clarification trainings were held throughout the SB 1041 implementation process in order to assure staff understood the new program rules. Imperial County also attended the 2013 CalWORKs Training Academy and identified the Academy as an excellent means to further understand these program changes, share best practices and strategies with other CWDs, and discuss with state officials both the benefits and challenges of implementing these changes.

Successes

Imperial County's step by step approach to implementing SB 1041 program changes was well organized and comprehensive. Imperial County offered various training opportunities to staff on SB 1041 related program changes, including opportunities to discuss the more complex aspects of the new program components. Imperial County took a very proactive approach to implementing these program changes and was able to meet the statewide goal of completing comprehensive discussions with all transitioning clients by June 30, 2013.

Imperial County has fostered strong collaborative relationships with other local agencies and organizations including its local Workforce Investment Board (WIB) and Workforce Investment Agency (WIA), the Imperial Valley Regional Occupation Program (IVROP), and San Diego State University (SDSU). Imperial County's staff also participate on an Interagency Steering Committee and the Southern Area Consortium of Human Services (SACHS) as a means to leverage both local and regional resources. Imperial County has taken a thoughtful approach to developing its WTW flow, with particular emphasis and focus on the universal engagement of its clients and identification of potential barriers clients may have to employment. Imperial County also utilizes home visits and subsidized employment as a means to outreach to and engage recently sanctioned clients.

Key Recommendations

Imperial County should continue to collect data on SB 1041 implementation and pay close attention to the data which is submitted through its consortium system to the CDSS for the monthly CalWORKs reports. Imperial County is also encouraged to continue providing clients with the option of utilizing the flexibility of the WTW 24-Month Time Clock, including allowing clients to pursue education and other training opportunities that are available. Imperial is also encouraged to continue its collaborative relationships and partnerships with other agencies, local organizations, and educational institutions as a means to best serve clients and leverage local and regional resources.

Acknowledgments

The CDSS thanks the Imperial County Department of Social Services for hosting this field monitoring visit. The CDSS appreciates the open collaboration with CWD staff to ensure the continued success of the CalWORKs program.

Field Monitoring Visit Summary

Introduction

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Background and Data

Imperial at-a-glance

Total Caseload	4,421
(Source: CalWORKs Cash Grant Caseload Movement Report [CA 237 CW] Line Item 8-March 2014)	
WTW Enrollees	1,270
(Source: CalWORKs Welfare-to-Work Monthly Activity Report [WTW 25/25A] Line Item 1-March 2014)	
Mandatory Participants (enrollees + sanctioned + non-compliance)	3,009
(Source: CalWORKs Welfare-to-Work Monthly Activity Report [WTW 25/25A] Line Item 1, 3A, and 31-March 2014)	
Reengagement Plan Received	Yes
Beginning Date of Reengagement	March 2013
Consortium System	C-IV

Data/Statistics Available at Time of Field Monitoring Visit

- Clients with more than 24 months left on their CalWORKs 48-month time limit as of January 1, 2013 who have had their comprehensive discussion: **1,300**
- Clients with less than 24 months left on their CalWORKs 48-month time limit as of January 1, 2013 who have had their comprehensive discussion: **700**
- Clients who have elected to change their WTW Plans as a result of the SB 1041 new participation requirements: **663**
- Sanctions that were cured as a result of SB 1041: **223**
- Clients who have met the definition of reengaged: **466**
- Clients who have elected to take the New Young Child Exemption: **829**

Summary of Documents provided by Imperial County

- Imperial County policy memoranda relevant to SB 1041 program changes
- Imperial County's AB X4 4 Short-Term Exemption Reengagement Sequencing Plan
- SB 1041 related training materials including All County Letter (ACL) digest summaries, business practice procedures for WTW 24-Month Time Clock tracking, training PowerPoint slide shows, and SB 1041 related questions and answers
- *CalWORKs Exemption Determination* (CW 2186B) template language
- Various job aids and screening worksheets that assist in the correct calculation of a client's CalWORKs 48-month time limit and WTW 24-Month Time Clock (include examples/scenarios)
- *Welfare-to-Work Activities that Meet CalWORKs Federal Standards* quick reference job aid
- SB 1041 related meeting summaries
- Instructional and clarifying email correspondence with all staff regarding SB 1041 implementation

County Administrator and Caseworker Interviews

The CDSS field monitoring visit team used the county administrator and caseworker interview tools released in All County Information Notice (ACIN) I-42-13 to interview the Imperial County administrator and Social Workers in-person regarding SB 1041 implementation. The tools were provided to the Imperial County administrator and Social Workers in advance of the visit. The administrator interview panel consisted of three CDSS staff and several county administrators. The

Social Worker interviews were conducted by two teams of CDSS staff members (one team of two CDSS staff members, and one team of a single CDSS staff member) with each team interviewing one Social Worker.

Summary of Observations

WTW 24-Month Time Clock Implementation and New WTW Participation Requirements

Transitioning Clients

[Less than and more than 24 months left on their CalWORKs 48-month time limit as of January 1, 2013]

Imperial County issued the *New Rules for CalWORKs WTW Activities Informing Notice* (CW 2205) through the C-IV consortium system on November 9, 2012. Clients were advised of the upcoming changes during orientation, appraisal, at workshops, and at other WTW follow-up appointments. Clients were also provided information when inquiring over the phone regarding the notice and during home visits. In Imperial County, clients were scheduled for in-person appointments to complete the comprehensive discussion.

Imperial County began comprehensive discussions with clients, regardless of time on aid, in January 2013. Social Workers prioritized appointments with clients that were closest to exhausting the CalWORKs 48-month time limit first. Staff were instructed to meet with each client and advise them of the new WTW activity flexibility available with the WTW 24-Month Time Clock, the new hourly participation requirement, and the benefits of meeting CalWORKs federal standards in order to preserve time on the WTW 24-Month Time Clock. Each client was given the opportunity to continue with his or her current activity or discuss the possibility of other activities. All comprehensive discussions with transitioning clients were completed by June 30, 2013 and documented in each client's C-IV case journal narrative.

For clients who were participating in or desired to participate in education activities, Social Workers would review each client's assessment results with the client and discuss activity recommendations made by the assessment. They would review the 12-month federal vocational education limit and, if any, how much time of it the client had already utilized. They would also discuss the potential benefits of meeting CalWORKs federal standards (e.g. preserving the WTW 24-Month Time Clock for later use). The Social Workers interviewed during this field monitoring visit noted that they encouraged clients interested in education to initially sign a plan to meet CalWORKs federal standards in order to preserve the WTW 24-Month Time Clock for later use.

Imperial County reported that most clients elected to change their WTW plans to meet the new minimum required hours of participation. Many clients liked having the flexibility now available under the WTW 24-Month Time Clock, though most initially attempted to meet CalWORKs federal standards in order to preserve the WTW 24-Month Time Clock for later use. Clients who were nearing the end of their CalWORKs time on aid and who had previously exhausted their 12-month federal vocational education limit, by utilizing the WTW 24-Month Time Clock, were more easily able to participate in beneficial trainings which would help them transition off of aid.

Clients who failed to attend SB 1041 appointments

If a client failed to attend his or her scheduled comprehensive discussion appointment, the non-compliance process would be initiated in accordance with the rules and regulations set by State and County Procedure. If the client failed to attend his or her non-compliance meeting, and he or she failed to respond after a final phone call by the Social Worker, once the 20-day compliance period ended, a sanction was implemented.

General Comments

Strategies for completing comprehensive discussions and the order by which to contact clients was determined based on individual Social Worker and supervisor strategies. Social Workers interviewed during this field monitoring visit used the WTW Plan Activity Assignment Form (WTW 2) as a visual aid to assist clients in understanding the new program rules. They also would reiterate basic requirements throughout scheduled appointments with clients in order to assure clients understood the new program rules.

In Imperial County, the average number of cases assigned to each Social Worker varies due to the county's geography and its number of offices. Further, the use of bilingual English/Spanish speaking staff is critical in Imperial County, considering its close proximity to Mexico. Sanction, exempt, Linkages, Self-Initiated Program (SIP), and Cal-Learn cases are managed by specialized units of Social Workers. Non-compliant and/or recently sanctioned cases are given special outreach and services which include the use of home visits and subsidized employment opportunities. These are a few of the engagement strategies used by Imperial County in an attempt to engage these clients back into the WTW program.

The staff interviewed during this field monitoring visit were concerned that the new program options, decreased required hours, and the formula originally put forth to calculate a client's participation requirement (weekly minimum hours) would impact Imperial County's ability to meet the Work Participation Rate (WPR). Since this visit, the CDSS has issued new guidance related to the passage SB 855, which changed the formula for calculating a client's participation back to a monthly average. The CDSS anticipates this change will benefit clients as well as positively impact Imperial County's ability to meet the federal WPR.

New Young Child Exemption

Information regarding the new young child exemption was distributed to Imperial County WTW staff beginning in January 2013. Most clients who are eligible for the new young child exemption in Imperial County are utilizing the exemption. Social Workers are instructed to thoroughly explain to clients that this is a 'once in a lifetime' exemption and it will not be available for use with another child. One of the Social Workers interviewed during this field monitoring visit noted that clients who utilize this exemption often times also opt to participate in the WTW program as a volunteer.

Clients with Good Cause for Lack of Supportive Services

Imperial County stated that during the period of time in which clients could be exempt from the CalWORKs 48-month time limit if found to have WTW good cause due to lack of supportive services (AB X4 4 exemption), no clients were found to have good cause for lack of supportive services. And so, this particular short-term AB X4 4 exemption did not need to be utilized by the CWD.

The New WTW Plan Activity Assignment Form (WTW 2)

The new WTW 2 was made available via the CDSS website December 2012. In January 2013, Imperial County Social Workers began using the new WTW 2 form. Initially the form was not available through the C-IV consortia system, so staff manually completed the form by printing it from the CDSS website and handwriting client information directly into the form. An electronic version of the form became available in the C-IV consortia system for use in March 2013. Upon form completion, each client's WTW 2 is imaged into the C-IV system in order to preserve the validity of the document.

General Comments

Imperial County Social Workers interviewed during this field monitoring visit liked having the flexibility to offer activities to clients that matched each client's individual assessment. They felt this was a positive change to the program. The Social Workers interviewed also liked the section on the new WTW 2 which requires the client to acknowledge how many hours he or she is required to participate in.

Social Workers interviewed also noted that clients struggle with comprehending the front page of the WTW 2 which includes double columns, reflecting the two different types of participation requirements (CalWORKs minimum standards/CalWORKs federal standards). Also, Imperial County staff were initially confused on how to complete this new form, particularly what side to assign activities on and how that assignment would impact a client.

Ultimately Imperial County Social Workers found that the new WTW 2 could be a great visual tool to explain what activities count toward the new WTW 24-Month Time Clock, once they understood how to properly use and convey the form to their clients.

Reengagement Process

Imperial County established a specialized unit of Social Workers to work on reengaging short-term young child exempt (AB X4 4) clients back into the WTW program. Imperial County's Reengagement Sequencing Plan was as follows:

- **March 2013** - Engage clients with the least amount of time left on their CalWORKs 48-month time limit (the group was limited to approximately 300 clients).
- **April 2013** - Engage the next group of approximately 100 clients with the least amount of time left on their CalWORKs 48-month time limit.
- **May 2013** - Engage the next group of approximately 100 clients with the least amount of time left on their CalWORKs 48-month time limit.

- **June 2013** - Engage remaining AB X4 4 clients.

Imperial County released the *Young Child Exemption Ends December 31, 2012 - New Rules for CalWORKs WTW Activities Informing Notice* (CW 2206) to all reengagement clients on January 15, 2013. An additional notice was issued on February 15, 2013 accompanied by the *CalWORKs Exemption Request Form* (CW 2186A), informing clients what their current participation status was (two-parent household, fully participating, partially participating, or not participating), and that they would soon be scheduled for an appointment to discuss engagement in WTW. Appointment notices were issued beginning March 2013 to the first target group for reengagement, and other groups thereafter according to their reengagement target month above. These appointment notices were followed up by a telephone call reminding the client of their upcoming scheduled reengagement appointment.

No clients requested to reengage prior to their scheduled reengagement appointment, though Imperial County staff were made aware that clients shall be granted expedited reengagement services if requested. Volunteering reengagement clients were allowed to continue in their voluntary activities until the reengagement process was complete. If the client at that time wished to update his or her WTW 2 to meet CalWORKs minimum or federal standards, he or she was allowed to do so following assessment recommendations but not until his or her reengagement process was complete.

Implementation Strategies

Imperial County's implementation strategy consisted of a comprehensive approach to inform staff of SB 1041 program changes. It included class room style training and the creation of various comprehensive job aids. Imperial County began SB 1041 implementation by first holding planning meetings with program specialists and managers in order to review statewide guidance and strategize on how to best implement these changes countywide. Training began with administrative staff and ongoing supervisors on January 7, 2013. The Imperial County Staff Development Unit provided training for each ongoing unit in the CWD as a whole and thereafter with each staff member individually during the week of January 21, 2013. During this training period, staff were informed and updated on the new program rules, resulting from the passage of SB 1041 (e.g. new hourly participation requirements, extension of AB X4 4 short-term exemptions, reengagement process, new young child exemption and the WTW 24-Month Time Clock).

Staff were also informed that a comprehensive discussion with each client was necessary in order to transition clients into the new SB 1041 WTW program standards. They were instructed that this comprehensive discussion had to include an explanation of the following:

- Participation flexibility during the WTW 24-Month Time Clock period,
- Change in the number of hours clients are required to participate in,
- A client's ability to change his or her WTW plan in accordance with the new rules,
- Criteria for WTW exemptions, including the new young child exemption,
- Conditions that allow a month not to count toward the new WTW 24-Month Time Clock,
- And, requirements clients must meet when either not utilizing their WTW 24-Month Time Clock or once their Clock has been exhausted (CalWORKs federal standards).

Staff were introduced to the new WTW 2, instructed on how to use it, and also instructed to prioritize appointments with clients that were closest to exhausting the CalWORKs 48-month time limit first. WTW program handbooks were updated with the new changes and used as a resource tool to explain the new program requirements and components to new clients. Additional training was also provided to staff on March 25, 2013 regarding use of the *Your WTW 24-Month Time Clock Notice* (CW 2208).

Imperial County utilized the CDSS Training Aid released in ACIN I-08-13 as a guide to train staff. Question and Answer Sessions, refresher, and clarification trainings were held throughout the SB 1041 implementation process in order to assure staff understood the new program rules. For example, refresher training was conducted on February 6, 2014 which provided clarification to staff on the use of the new WTW 2 and what WTW plans would begin a client's WTW 24-Month Time Clock. Check points were also in place between Imperial County's administration and staff to ensure all were on target to complete the reengagement process with applicable clients.

Imperial County used a variety of methods to best prepare its Social Workers for explaining these program changes to clients. These methods included the creation of job aids to assist staff in accurate calculation of client's CalWORKs time on aid and WTW 24-Month Time Clocks. Imperial County also provided staff with a simplified version of the *Welfare-to-Work Activities that Meet CalWORKs Federal Standards* guide (see ACL 13-59, Attachment B) for use during WTW Plan development. Further, a *SB 1041 Question and Answer* chart was also developed which provided staff with a simple reference tool for understanding some of the more complex aspects of the SB 1041 program changes. The overall structure and depth of these documents appear to have benefited Imperial County's implementation and staff's understanding of SB 1041 program changes.

Imperial County also attended the 2013 CalWORKs Training Academy and identified the Academy as an excellent means to further understand these program changes, share practices and strategies with other CWDs, and discuss with state officials both the benefits and challenges of implementing these changes.

General Comments

Imperial County Administrative staff noted that Social Workers were initially instructed to prepare all WTW Plans by utilizing the left side of the WTW 2 (meeting CalWORKs minimum standards). If a client met CalWORKs federal standards within a given month, that month would not count towards the client's WTW 24-Month Time Clock pursuant to statewide guidance. Also, Imperial County staff had initially continued assigning clients to an average monthly participation requirement rather than utilizing the new weekly minimum participation requirement implemented by SB 1041. Imperial County staff, upon attendance of the 2013 CalWORKs Training Academy (held December 2013), realized these implementation errors and proceeded to take action in order to correct these issues by providing additional training and guidance to staff. It should be noted that since this visit, the CDSS has issued new guidance related to the passage SB 855, which changed the formula for calculating a client's participation back to a monthly average.

Case Reviews

The CDSS field monitoring visit team reviewed five cases selected by Imperial County in advance of the visit. The purpose of this component of the visit was to review how SB 1041 program changes were being integrated into case management, understand how SB 1041 policies were being operationalized by individual Social Workers, and better comprehend case management within Imperial County.

There were five specific case types requested:

- Case One - A client with ***less than or equal to*** 24-months left on the CalWORKs 48-month time limit as of January 1, 2013;
- Case Two - A client with ***more than*** 24-months on the CalWORKs 48-month time limit as of January 1, 2013;
- Case Three - A new client (beginning date of aid January 1, 2013 or later);
- Case Four - A client who was sanctioned, had reported earnings and whose case was curable based on the new participation requirements (preferably a case actually cured since January 1, 2013 based on new participation requirements); and
- Case Five - A client that was part of the short-term young child exemption (AB X4 4) population, and is either in the process of or has been reengaged.

General Comments

Imperial County uses the C-IV case management system. The following is a summary of the case findings:

- Noticing Requirements
All noticing requirements for the CW 2205 and CW 2208 were met for all cases reviewed, where applicable.
- Comprehensive Discussions and Additional Outreach
All cases reviewed received a comprehensive discussion during an in-person appointment with their respective Social Worker. Notation of these discussions was found in the case journal narrative section of C-IV.
- WTW Plan Activity Assignment Form (WTW 2)
All case files reviewed with WTW Plans developed on or after January 2013 (new case, both transitioning cases, and reengagement case) used the new WTW 2. The sanction case reviewed was a two-parent household. One of the parents had a new WTW 2 on file which reflected his or her current WTW Plan, while the other parent had opted to take the new young child exemption.
- Sanction Case
The sanction case reviewed was a two-parent household. Both parents received a comprehensive discussion and where eligible for the new young child exemption. One parent opted to utilize the new exemption, while the other parent signed a new WTW Plan which reflected the current participation requirement for a two-parent household.

- Reengagement Case
The case reviewed met all reengagement noticing requirements, including the issuing requirements for the CW 2206, timelines for the secondary contact/appointment, third contact reminder, etc. The client became fully reengaged back into the WTW program in March 2013.
- New Young Child Exemption
Only one case reviewed was eligible for the new young child exemption. This case was a two-parent household and one of the parents opted to utilize the new WTW exemption, while the other parent signed a WTW Plan agreeing to complete the entire household's participation requirement.

Conclusion

Successes

Imperial County's step by step approach to implementing SB 1041 program changes was well organized and comprehensive. Imperial County offered various training opportunities to staff on SB 1041 related program changes, including opportunities to discuss complex aspects of the new program components and refresher trainings. Imperial County took a very proactive approach to implementing these program changes and was able to meet the statewide goal of completing comprehensive discussions with all transitioning clients by June 30, 2013. Imperial County also submitted useful data for this field monitoring visit which has assisted the CDSS in better understanding the impact of SB 1041 program changes on the Imperial County CalWORKs program.

Imperial developed a number of informative documents which assisted staff in better understanding the SB 1041 program changes. For example, one particular job aid assisted staff in assuring accurate accounting of client's CalWORKs 48-month time limits and WTW 24-Month Time Clocks. Also, a simplified version of the *Welfare-to-Work Activities that Meet CalWORKs Federal Standards* guide (see ACL 13-59, Attachment B), provided staff with a tool for use during WTW Plan development. Lastly, the *SB 1041 Question and Answer* chart provided staff with a simple reference tool for understanding some of the more complex aspects of the SB 1041 program changes. The overall structure and depth of these documents appeared to benefit Imperial County's implementation of SB 1041 program changes.

Imperial County has fostered strong collaborative relationships with other local agencies and organizations including its local Workforce Investment Board (WIB) and Workforce Investment Agency (WIA), the Imperial Valley Regional Occupation Program (IVROP), and San Diego State University (SDSU). Imperial County CWD staff meet regularly with these groups in order to best strategize local resources and tackle its unique regional challenges, including limited education and job opportunities which exist in this remote county. Imperial County's staff also participate on an Interagency Steering Committee which works to align the goals and leverage the resources of various human services and workforce oriented agencies, including Workforce Development, other Social Services, and Mental Health agencies.

Imperial County also participates in the Southern Area Consortium of Human Services (SACHS) which consists of human service directors from the Southern California counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, Santa Barbara, and Ventura. The SACHS is a forum for these CWDs to explore and exchange ideas and information on issues facing public human services organizations and to develop strategies for addressing these issues. Participation in this group further assists Imperial County in strategizing with other local counties in order to develop a WTW program which meets the needs of its clients and assists them toward achieving self-sufficiency.

Imperial County has taken a thoughtful approach to developing its WTW flow, with particular emphasis and focus on the universal engagement of its clients and identification of potential barriers clients may have to employment. Staff actively screen clients during orientation and appraisal for potential barriers to employment. Imperial County also works with the IVROP to provide specialized substance abuse and mental health screens for clients, through a program called Project Thrive. The local IVROP also assists in providing other barrier removal services for Imperial County CalWORKs clients including Family Stabilization services. Imperial County has also developed various job readiness activities which further assist clients in removing minor barriers to employment, including life skills classes and the Empowerment Course (developed by SDSU).

Imperial County also sites its active utilization of subsidized employment available through AB 98 and the recent Expanded Subsidized Employment (ESE) program, as a means to place clients in work activities which often times lead to more permanent, long-term employment opportunities. Imperial County also utilizes home visits and subsidized employment as a means to outreach to and engage recently non-compliant and/or sanctioned clients. Imperial County has found success in these outreach efforts and plans to continue this strategy as a means to engage non-compliant clients in WTW activities.

Challenges

The delay in the issuance of instruction by the CDSS was a hardship for Imperial County. Delayed guidance regarding the extension of the AB X4 4 short-term exemptions resulted in some clients being sanctioned. This was corrected by Imperial County once statewide guidance was released. Further, the manner in which policy clarification was released, via a series of Question and Answer ACLs resulted in the incorrect use of the WTW 2 (assigning clients only to CalWORKs minimum standards – left side of plan). Also, it resulted in Imperial County staff initially assigning clients to an average monthly participation requirement rather than utilizing the new weekly minimum participation requirement implemented by SB 1041.

Imperial County staff, upon attendance of the 2013 CalWORKs Training Academy (held December 2013), realized these implementation errors and reacted by providing additional training and guidance to staff in order to correct these initial implementation errors. It should be noted that since this visit, the CDSS has issued new guidance related to the passage SB 855, which changed the formula for calculating a client's participation back to a monthly average.

The geography of this particular county is also a major challenge in providing services to clients. The vast size and remoteness of certain communities makes it difficult to provide clients with the opportunity to pursue certain activities. Also, related to this, is the difficulty Imperial County has in providing transportation options and services to clients in more remote areas.

The provision of language services is also a challenge, but one in which Imperial County has been able to overcome. Due to the proximity of Imperial County to Mexico, staff estimated that as much as 80 percent of residents are either bi-lingual English/Spanish speakers, or solely Spanish speaking. The use of bilingual Social Workers is critical in order for services to be delivered to clients. Imperial County has overcome this potential challenge by actively recruiting bilingual Social Workers. Imperial County also delivers its various job readiness courses and WTW orientation in Spanish as well as in English. While providing language services can be a challenge in some counties, Imperial has been able to overcome what could be an incredible challenge, through its staff recruitment efforts.

Key Recommendations

Imperial County should continue to collect data on SB 1041 implementation and pay close attention to the data which is submitted through its consortium system to the CDSS for the monthly CalWORKs Cash Grant Caseload Movement Reports (CA 237 CW), and CalWORKs WTW Monthly Activity Reports for All (Other) Families and Two-Parent Families (WTW 25/25A). These sources are relied upon heavily by the CDSS to track and measure program progress.

Imperial County is also encouraged to continue providing clients with the option of utilizing the flexibility of the WTW 24-Month Time Clock, including allowing clients to pursue education and other training opportunities that are available and relevant to the local job market. Imperial County is also encouraged to continue its collaborative relationships and partnerships with other agencies, local organizations, and education institutions as a means to best serve clients and leverage local and regional resources.

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