

**Imperial County Department of Social Services
CalWORKs**

**County Plan Addendum
Transportation Policy**

Imperial County Welfare to Work Supportive Services – Transportation Policy

I. Introduction

The goal is providing necessary transportation services to assist CalWORKs participants in commuting to and from Welfare-to-Work (WTW) activities or employment. The Manual of Policies and Procedures (MPP) Section 11-501.3 and All County Letters 00-08, 00-12, 00-54, 03-15, and 08-41 require that Imperial County develop specific written policies and procedures for transportation supportive services in the CalWORKs program. To that purpose this developed policy is based on the following welfare-to-work regulations set forth in MPP chapter 42-700.

II. Policy Statement

Necessary transportation services shall be available to every participant in order to participate in the welfare-to-work program activity(s) to which he or she is assigned or to accept or retain unsubsidized employment.

Necessary services are defined as those services without which the participant would be unable to comply with his/her assigned welfare-to-work activity(s).

CalWORKs participants who are employed in unsubsidized employment for the required number of hours to meet participation requirements, and who opt out of an assessment are not required to sign a welfare-to-work plan, however the individuals are eligible to receive necessary transportation supportive services. If necessary transportation services are not available, the individual shall have good cause for not participating.

III. Determination of Supportive Service Need

Imperial County Department of Social Services is responsible for the assessment of transportation supportive services in collaboration with the applicant. This includes transportation needed for childcare as well as for WTW activities and employment.

Transportation services for work activities and employment shall not be deemed necessary in circumstances that include, but are not limited to, the following:

- A. Transportation needs are being met or could be met without cost to the participant. Examples: use of company issued vehicle, company established ride share programs.
- B. The participant is not enrolled in an approved WTW activity.

IV. Transportation Methods and Costs:

Imperial County is a rural county in which participants may be required to travel significant distances to be able to attend assigned Welfare to Work activities and/or employment. A considerable amount of participants face certain barriers in regards with transportation in this county, example: not having a valid driver's license, not having access to a functioning vehicle, living in a remote area without access to public transportation and/or having a vehicle in need of some repair.

- A. Modes of transportation available to participants include, but are not limited to the following:
1. Transportation provided by Imperial County.
 2. Available public transit.
 3. Private and or other public transportation carriers. This includes, but is not limited to, the following: bus, carpool, vanpool, rideshare programs, private companies and providers who transport children between schools and childcare.
 4. Personal vehicle (pursuant to MPP section 42-750.112).

Transportation utilizing multiple carriers may be necessary for a participant to participate in their WTW activity(s).

B. Transportation Payment Rate:

Payments for supportive services are to be advanced to a participant whenever necessary and desired so that the participant need not use their own funds to pay for these services.

Transportation costs shall be determined by regional market rates. The participant shall use the least costly mode of transportation. Participants who live more than one mile from a transportation zone and who choose to use their own vehicles will be reimbursed:

- At a rate that is developed utilizing local **operating and ownership costs** and as referenced in the current edition of "AAA Your Driving Costs."

Participants who live more than one mile from a transportation zone and are being transported by a family member or friend or are being loaned a vehicle will be reimbursed;

- At a rate developed utilizing **local operating costs only** and as referenced in the current edition of "AAA Your Driving Costs" manual.
 1. Necessary parking for WTW participants shall be reimbursed at actual cost. Participants must submit receipts for payment to be made, except in case where parking meters are used. Reimbursement for parking/parking meters will only

be allowed when there is not any no-cost parking available within one-half mile of the work/training site as long as the individual has no physical limitations which would prevent a half-mile walk. The half-mile walk should not cause the individual's commute time to exceed two hours roundtrip or two miles round trip if walking is the only means of transportation available.

2. Participants who choose to use their own vehicle when county or public transportation is available will be reimbursed at the least expensive reimbursement rate; unless public transportation does not meet the time requirement, as stated in MPP 42-721.313 (a) The round trip travel time required exceeds a total of two hours, exclusive of the time necessary to transport family members to a school or place providing care.
3. Fixed or flat rate fees are allowable to the extent that they represent the least costly method of necessary transportation available, not to exceed operating costs. Examples: Participant charged \$40 per month to secure a seat in a vanpool or \$6 per week to help cover the cost of gas in a co-worker's car.
4. Participants carpooling together shall be reimbursed as follows:
 - a. Owner/driver: Ownership and operating costs for the first 1,250 miles. After 1,250 miles, it reverts to operating costs only.
 - b. Riders: One-half operating costs or actual costs if less.

C. Vehicle Repair Policies

1. Vehicle repairs shall be considered on a case-by-case basis and shall be paid or reimbursed only when *all* of the conditions below are met:
 - a. The participant is enrolled in or participating in an approved Welfare-to-Work activity, including employment, self-employment, job search or other approved activity.
 - b. Public transportation is not available to the participant.
 - c. The CalWORKs participant does not have another operable vehicle available to use for transportation to and from approved activities.
 - d. The participant does not have access to any other form of transportation to approved activities including (van pool, dial a ride services, friends/family)
 - e. Participant must possess a valid and current California Driver's License.
 - f. The vehicle is currently insured and meets the Department of Motor Vehicles (DMV) minimum vehicle insurance requirements.
 - g. The vehicle is registered under the participant's name with the DMV.
 - h. The vehicle is listed as the participant's property on the CalWORKs benefits case.
 - i. The cost of the repairs is not to exceed 80% of the vehicle's wholesale Kelly Blue Book value.
 - j. The participant has received services less than \$500.00 for vehicle repairs during the prior twelve months. The County may determine that

extenuating circumstances require vehicle repairs in excess of \$500 for one family within a 12 month period of time. These possible requests will be reviewed, considered and approved by a Supervisor or Program Manager with CalWORKs WTW.

- k. Two estimates for the repair must be submitted to County staff and the repair facility must provide verification that the vehicle is worth the cost (80% of current Kelley Blue Book value) of repair(s) and will be safe to drive after completion.
- l. Cosmetic repairs are not covered under this repair plan.
- m. Payment or reimbursement of vehicle repairs is not available when a participant is receiving mileage reimbursement payments as a CalWORKs supportive service and the request is for an item that is considered a routine maintenance and operation cost.
- n. The decision of the designated County staff regarding the repair request is final and a notice of action will be issued to the participant regarding this decision.
- o. Requests that are not approved under this section may file for a state hearing as described on the Notice of Action.

V. Transportation for Child Care:

For parents of school-aged children, reliable transportation to take children between childcare or school and/or school and childcare may be necessary in order for parents to participate in their WTW activities. Some parents may rely on multiple child care arrangements to meet their needs, such as transportation that takes children from one childcare provider (such as half day Head Start program) to another (such as exempt provider). If transporting children is a necessary supportive service, transportation services shall be provided as follows:

- A. When transportation is included as part of their child care rate, transportation is fully covered by the CalWORKs childcare payment and subject to the Regional Market Rate (RMR). If the cost exceeds the RMR, parents are responsible for payment of the difference between the RMR and the actual childcare cost.
- B. If transportation is NOT included as part of a child care rate, the transportation charges are not paid through Stage 1 childcare. When it is determined that the child's transportation is necessary in order for the parent to participate in assigned WTW activities, transportation reimbursement shall be provided for children of WTW participants.

VI. Who is Eligible to Receive Transportation Payments:

The following participants are eligible to receive transportation supportive services payments:

- A. Any participant in assigned WTW activity(s) or employment who remains eligible for aid shall be eligible for necessary transportation expenses as specified in this policy. This includes participants in on-the-job training; grant based on-the-job training, supported work, or transitional employment.
- B. Any participant in unsubsidized employment who becomes ineligible for CalWORKs due to earned income shall be eligible to receive transportation supportive services for up to **3 months** from the date of ineligibility from CalWORKs provided this duration does not exceed their 60-month CalWORKs time limit. See also section IX.
 - 1. Any participant in on-the-job training who becomes ineligible for CalWORKs due to earned income shall remain a participant in the program under WTW for the duration of the on-the-job training assignment provided this duration does not exceed their 60-month CalWORKs time limit.

VII. Participant Responsibilities

- A. The participant is responsible for the following:
 - 1. Providing verification of all transportation costs claimed on form IC-CW 119 in a complete and timely manner. This includes, but not limited to, receipts for parking permits and work/training/childcare related transportation costs.
 - 2. Notifying the county within 10 calendars days of any changes in transportation needs or costs.
 - 3. Cooperating with the county in resolving incomplete or inconsistent information.
 - 4. If participant is utilizing mileage reimbursement, the participant shall provide verification of a valid driver's license and current registration and insurance for the vehicle(s) used. Both the driver's license and the vehicle insurance shall be valid during the period covering the requested transportation expense.
 - 5. Employed participants must submit verification of employment for the period of the claimed transportation expenses. This includes, but is not limited to: check stubs, employer statements, and/or time sheets/cards.
 - 6. Provide monthly beginning and ending vehicle odometer readings on form IC-CW119 for the purposes of determining actual miles driven in a given month as requested.

VIII. Imperial County Department of Social Services Responsibilities:

- A. ICDSS, or its contracted agents, is responsible for the following:

1. Reviewing the need for transportation supportive services with the participant.
2. Fully informing the participant of all required forms and/or other verification required, including form due dates that are needed to issue payment for transportation services. This includes informing the participant that non-receipt of required forms, will result in nonpayment of transportation expenses.
3. Providing forms required for payment of transportation supportive payments.
4. Making transportation referrals and /or arrangements for transportation for the participant as needed.
5. Processing the transportation claim form, IC-CW 119, in a timely manner and authorizing payment for transportation supportive services as indicated. Timely processing means determining the participant's eligibility for a transportation supportive services payment, issuing the appropriate Notice of Action, and authorizing appropriate payment if eligible, within 20 working days of the claim's receipt.

IX. Job Retention Services:

Any participant in unsubsidized employment, who becomes ineligible for CalWORKs due to earned income, shall be eligible to receive transportation supportive services for up to 3 months from the date of ineligibility from CalWORKs provided availability of funds. There shall be a cumulative 6-months lifetime limit. Participants who exhausted their CalWORKs 60-months time limit shall not be eligible for Job Retention Services.

- A. The County shall provide retention services payments for up to 3 months provided availability of funds from the date terminated from cash aid provided the former participant continues to be employed during the 3 months and transportation supportive services payments are:
 1. Not provided by the employer or the entity that arranged the job placement, if other than the county.
 2. Not available from other sources.

X. Transportation Services and Financial Aid:

- A. Transportation reimbursement shall be provided, as stated above, if no other source of funding for those cost is available. Financial aid is treated as follows:
 1. The availability of financial aid shall be considered when received by the participant when determining the need for transportation services. Educational loans or work study program award shall be excluded from consideration when determining supportive services needs.
 2. Transportation services shall not be denied or reduced if the participant indicates that the financial aid is not available to meet transportation needs.
 3. All determinations shall be documented regarding consideration of a participant's educational grants, scholarships and awards in the case file.

4. Written agreements with financial aid offices at educational institutions should be attempted in order to avoid duplication of supportive services. Any agreement with the institution shall include, but not limited to, the following: A description of the supportive services to be provided by each party, a provision for amendments and modification as necessary, and a provision that supportive service needs will be evaluated on a case-by-case basis.