

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

Tehama County

October 30, 2014

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

Tehama 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 former 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

The one-day field monitoring visit was performed in Tehama County on Thursday, October 30, 2014 at the Tehama County Department of Social Services in Red Bluff, CA. The field monitoring visit team included three CDSS staff along with the county's Employment Services Division Program Manager, Employment Services Division Employment and Training Supervisor, Employment and Training Worker III, Employment and Training Worker II, and Employment and Training Department Analyst. The field monitoring visit consisted of a kick-off meeting, close-out meeting, staff interviews, and case management observations with county staff.

Implementation Strategies

Tehama County utilized a wide range of information to guide its SB 1041 implementation. County management and staff reviewed the SB 1041 legislation and related CDSS correspondence, participated on conference calls, incorporated information from the Tehama County Advisory Committee, and attended California Welfare Directors Association (CWDA) CalWORKs Policy Committee meetings. Internal workgroups were instituted to discuss the implications of:

- Ending the Young Child Exemption.
- New WTW requirements.
- WTW 24-Month Time Clock.

Quantitative caseload data was collected and analyzed to determine the potential workflow consequences of SB 1041 program changes on Tehama County implementation. This data analysis was employed in the production of an implementation timeline, based on CDSS recommendation, which matched available county staff resources with program needs.

Training to implement SB 1041 changes in Tehama County proceeded in phases. First, county management convened an internal workgroup meeting to create a comprehensive training plan for staff. This meeting resulted in development of a staff training day. This training was held in February of 2013 and included information on the following topics:

- 24-Month Time Clock overview.
- Tracking time clocks.
- Instructions developing the WTW plan, including use of the WTW 2 form and activities.
- Exemptions.
- Re-engagement/Comprehensive discussions.
- Process for Supervisors.
- Questions.

In addition to this initial session, staff was provided two subsequent trainings, one specific to the WTW 24-Month Time Clock, and another concentrating on hours and activities, including the alignment of state and federal participation requirements. Tehama County staff developed an original teaching instrument using the CDSS training tool, and also used the CalWORKs WTW Reengagement Program Flow Tool in a Reengagement Workgroup. Tehama County staff developed unique tools to assist in SB 1041 implementation including the "Household Composition Hourly Requirements by Type" form which outlines the variance between CalWORKs minimum standards, CalWORKs federal standards, and federal TANF participation requirements, and the "24-Month Time Clock Decision Tree," a visual guide that assists Tehama County Employment Services staff to understand when the WTW 24-Month Time Clock should "tick" or not.

Tehama County implemented changes immediately after the training was completed in a manner consistent with CDSS implementing All County Letters and question and answers.

Training materials were provided to the CDSS and aligned with SB 1041 implementation instructions issued by the CDSS. The training material was based on the teaching information provided by the CDSS through All County Information Notice I-08-13.

Key Recommendations

- Continue to develop and implement strategies and tactics to fully engage Tehama County CalWORKs clients and improve the county's work participation rate (WPR).
- Continue the "data driven" approach to gain greater understanding of what works for CalWORKs clients, and what might be altered to help develop greater client self-sufficiency and improve county WPR.
- Continue to leverage Community Action Agency's co-location of the "Wraparound case model" to ensure clients have access to available benefits.

Acknowledgments

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

Field Monitoring Visit Summary

Introduction

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Background and Data

Tehama County at-a-glance

Total Caseload.....	1,256
(Source: CalWORKs Cash Grant Caseload Movement Report CA 237 CW Line Item 8a-December 2014)	
WTW Enrollees.....	401
(Source: CalWORKs Welfare-to-Work Monthly Activity Report WTW 25/25A Line Item 1-November 2014)	
Mandatory Participants (enrollees + sanctioned + non-compliance).....	701
(Source: CalWORKs Welfare-to-Work Monthly Activity Report WTW 25/25A Line Item 1, 3A, and 31- November 2014)	
Reengagement Plan Received.....	Yes
Beginning Date of Reengagement.....	July 1, 2013
Consortium System.....	C-IV

Data/Statistics Available at Time of Field Monitoring Visit:

- Clients who had more than 24 months left on their CalWORKs 48-month time limit as of January 1, 2013, that have had their comprehensive discussion: Tehama County reports that it is not possible for them to know with complete certainty that all clients who had more than 24 months left on their CalWORKs 48-month time limit as of January 1, 2013 have had their comprehensive discussion due to incongruities with documentation in the C-IV system. The county believes that all clients in this category have received the discussion and a plan and process are in place to ensure that all clients receive the discussion.
- Clients who had less than or equal to 24 months left on their CalWORKs 48-month time limit as of January 1, 2013, that have had their comprehensive discussion: Tehama County reports that it is not possible for them to know with complete certainty that all clients who had less than 24 months left on their CalWORKs 48-month time limit as of January 1, 2013, have had their comprehensive discussion due to incongruities with documentation in the C-IV system. The county believes that all clients in this category have received the discussion and a plan and process are in place to ensure that all clients receive the discussion. Sanctions that were cured because of SB 1041: Tehama County reported that no clients cured their sanction due to SB 1041 program requirements.
- Former short-term young child exempt clients (AB X4 4) that have been reengaged: Tehama County reports that all former short-term young child exempt clients (AB X4 4) have been reengaged.
- WTW plans that have changed because of SB 1041 implementation: Tehama County reports that all WTW clients who requested a change in their WTW plan because of SB 1041 program changes or mandated discussions have had their plans changed accordingly.
- Clients that have used the new once in a lifetime young child exemption: 135 cases have utilized the new once in a lifetime young child exemption.
- Other statistics that the county is keeping related to SB 1041 implementation: N/A.

Summary of Documents provided by Tehama County

- Tehama County CalWORKs organization chart.
- Tehama County Department of Social Services informing notices to clients regarding SB 1041 changes, including notices informing clients about the new WTW 24-Month Time Clock, that clients with 24 months or less on the WTW 24-Month Time Clock will have months count on the WTW 24-Month Time Clock beginning January 1, 2013, and that sanctioned clients may have their sanctioned cured due to the new hourly requirements.
- Tehama County memoranda regarding SB 1041 implementation.
- Tehama County's AB X4 4 Short-Term Exemption County Reengagement Sequencing plan and associated memorandum to staff and notice to clients.
- Training session PowerPoint presentation slides.
- Training session minutes.
- WTW Activities Menu.
- WTW 24-Month Time Clock Decision Tree.
- Household Composition Hourly Requirements chart.
- CalWORKs WTW Reengagement Program Flowchart.

County Administrator and Caseworker Interviews

The CDSS field monitoring team used the county administrator and caseworker interview tools released in All County Information Notice I-42-13 to interview the county administrator and case workers in-person regarding SB 1041 implementation. The tool was provided to county administrators in advance of the visit. The administrator interview panel consisted of three CDSS staff and one county administrator. The caseworker interviews were conducted by one CDSS staff member interviewing each caseworker.

Summary of Observations

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

For clients with less than and more than 24 months left on their CalWORKs 48-month time limit

Tehama County issued the initial *New Rules for CalWORKs Welfare-to-Work Activities* Informing Notice (CW 2205) on November 9, 2012. Following the issuance of this notice, the county began comprehensive discussions with clients on February 28, 2013; the day after staff training was completed. All clients identified in this population have had their comprehensive discussion. New and existing clients continue to receive the comprehensive discussion both at the client group orientation and again at the one on one appraisal. The county tracked the completion of the comprehensive discussions by dedicating specific management staff to oversee the effort. County staff is instructed to include documentation of the comprehensive discussion in the case file and C-IV system and a tracking template was developed and distributed to staff for this purpose.

In general, many clients are choosing to lower their hours and utilize the flexibility provided by the WTW 24-Month Time Clock. Clients who were working frequently chose not to reduce their hours. Tehama County has traditionally allowed and encouraged clients to utilize barrier removal options to develop greater self-sufficiency so the focus on barrier removal in SB 1041 was not viewed as a significant change for the county. However, clients that choose to engage in education predominantly use the WTW 24-Month Time Clock and 12-months allowed for vocational education under CalWORKs federal standards rather than engage in a self-initiated program.

Clients who failed to attend SB 1041 appointments

Clients who failed to respond to the county's request to discuss the SB 1041 changes received additional contact(s) by the Employment and Training Workers (ETW's). Tehama County used several methods of outreach including mail, email and phone calls to the clients as well as setting up formal appointments. Additional information is provided to unresponsive clients who are not meeting minimum requirements, including the *Welfare-to-Work 24-Month Time Clock Notice* (WTW 38) and any necessary follow-up calls. The non-compliance process is initiated when appropriate.

General Comments

Tehama County utilizes a task-based approach to administering social services. The county does not utilize a call-center but has two offices where eligibility and employment services are co-located. Caseload per ETW is in the range of 55- 90, depending on the experience and individual skill set of the ETW. Caseload assignments are determined by the specifics of each individual case and the ETW staff typically administers cases that fit their strengths and experience. Caseload data is collected, analyzed, and utilized to identify, sort, and assign cases to ETW's for optimal "fit".

County staff has developed unique reference tools, such as the "Decision Tree on WTW 24-Month Time Clock", and the "Household Composition Hourly Requirements by Type." Unresponsive welfare-to-work exempt cases and sanction cases are contacted as soon as practicable by the assigned caseworker and attempts to contact the client e.g. clients letters, phone calls are made continually until resolved.

Once determined eligible, CalWORKs cases are assigned to county ETW's for administration of welfare-to-work. Tehama County has traditionally focused on barrier removal and clients who have significant barriers to employment such as mental health, substance abuse, or domestic abuse issues are encouraged and supported in their effort to mitigate these challenges to long-term self-sufficiency.

New Young Child Exemption

During the time of the one day visit, it was noted that Tehama County had 135 cases that choose to take the new once in a lifetime young child exemption. Some clients chose to preserve this one time exemption to use in the future. Clients that chose the new once in a lifetime young child exemption have the opportunity to volunteer; however, many have decided not to participate in this manner.

Clients with Good Cause for Lack of Supportive Services

Tehama County has not traditionally exempted clients for lack of supportive services and no current Tehama County CalWORKs clients have been exempted for this due to lack of supportive services.

The new WTW Activity Plan/Form (WTW) 2

The new *Welfare-to-Work Plan Activity Assignment (WTW 2)* form was made available via the CDSS website December of 2012. Tehama County downloaded the form and began to use it immediately. Currently, county staff utilizes a copy of the WTW2 from the C-IV system site, characterized as the "Activity Agreement." In general, county staff used the WTW 2 as a tool to explain the activities available under the WTW 24-Month Time Clock. In addition, county staff use the WTW 2 as a written record of what activities the client has agreed to participate in and a list of any needed supportive services.

General Comments

Tehama County workers felt that the WTW 2 is often confusing to the client and requires an in-depth staff explanation in order for them to understand what was stated and their options. The WTW 2 is most often used as a guide during a client's SB 1041 comprehensive discussion. County staff reported that some client concerns were expressed about the complexity (left and right sides), and length of the WTW 2 form.

Reengagement Process

Tehama County began reengaging all AB X4 4 clients on February 6, 2013. Tehama County's Sequencing Plan was as follows:

- **February 2013** - Self-Engaged Clients who want to reengage prior to the county process.
- **October, 2013** - Client re-engagement begins and is completed based on client's scheduled redetermination date.
- **October, 2013** - Clients that have not self-engaged or that have not yet reached their scheduled redetermination date will receive the re-engagement notice at least once every six months until re-engagement is completed.

The reengagement process for Tehama County began with the county sending the *Young Child Exemption Ends December 31, 2012, New Rules For CalWORKs Welfare-To-Work Activities* Informing Notice (CW 2206) to clients in mid-January 2013, informing them of the need to reengage. As a second notice the county sent the *Re-engagement Evaluation Notice* to schedule the re-engagement evaluation 30 days prior to the scheduled appointment. The Re-engagement Evaluation Notice included the *CalWORKs Exemption Request* form (CW2186A). Employment Services Aides conducted the required reminder call prior to the appointment (the required 3rd contact). The appointment was defined as Orientation and Appraisal. Re-engaged client tracking in Welfare Data Tracking Implementation Project (WDTIP), the Welfare Data Tracking Implementation Project, a statewide welfare time-on-aid tracking and reporting system, was completed by task-specific dedicated staff.

In addition to the aforementioned notices, Tehama County used phone calls to contact clients who did not attend the reengagement orientation. Reengagement clients' WTW 24-Month Time Clocks did not begin until a WTW 2 was signed and necessary supportive services were provided. Clients who failed, without good cause, to respond to both notices and county phone calls were subject to non-compliance and possible sanction.

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Tehama County implemented changes immediately after the training was completed in a manner consistent with CDSS implementing All County Letters and question and answers. Training materials were provided to the CDSS and aligned with SB 1041 implementation instructions issued by the CDSS. The training material was based on the teaching information provided by the CDSS through All County Information Notice I-08-13.

All Tehama County clients were contacted for required re-engagement by October 8, 2014. Tehama County utilized multiple strategies to re-engage clients, including re-engaging clients at *JumpStart*, a quick client caseworker interaction, and at orientation and assessment, or at annual redetermination. The county also sent notices and made phone calls to re-engagement required clients. The county also moved all re-engagement clients into a caseload administered by a dedicated staff member to more efficiently track and engage clients.

Case Reviews

The CDSS field monitoring team reviewed five cases selected by Tehama 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 the caseworker, and better comprehend case management within the 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).
- Case Five - A client that was part of the former short-term young child exemption AB X4 4) population, and is either in the process of or has been reengaged.

General Comments

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

- **Noticing Requirements:** All noticing requirements were met including the *New Rules for CalWORKs Welfare-to-Work Activities* Informing Notice (CW 2205) and *Your Welfare-to-Work (WTW) 24-Month Time Clock* Notice (CW 2208).
- **Comprehensive Discussions and Additional Outreach:** All required comprehensive discussions were completed.
- **The Learning Disability Screening** was offered to all five cases reviewed. Four out of five cases waived the screening and one case received the screening.
- **Welfare-to-Work Plan Activity Assignment (WTW 2):** All case files with plans developed on or after January 2013, used the new Welfare-to-Work Plan Activity (WTW 2). All plans were complete and included supportive services to be provided to the clients.
- **New Young Child Exemption:** One case reviewed chose to take the new young child exemption and all requirements were met.
- **Reengagement:** The Reengagement case notes included the comprehensive discussion conducted on October 1 and October 4, 2013.

Conclusion

Successes

Tehama County utilized a multi-pronged approach to SB 1041 implementation. The county reviewed all pertinent state communication, networked with nearby counties, leveraged knowledge from their County Advisory Committee, and attended CWDA CalWORKs Policy Committee meetings to build a necessary knowledge base. Tehama County convened internal workgroups where discussions were held concerning the implications of ending the short term young child exemptions, implementation of the new WTW requirements, and the WTW 24-Month Time Clock. The information compiled from these efforts was integrated into staff trainings that detailed the changes in SB 1041.

Tehama County is committed to a data driven approach to Social Service delivery. Data was collected, analyzed and utilized to chart changes in workflow resulting from SB 1041, specifically the mandated re-engagement. This analysis led to a timeline, based on CDSS recommendations, that resulted in a progression of tasks matched to staffing availability, client needs, and SB 1041 requirements.

Tehama County has shown commendable inventiveness in developing unique training and reference documents for their staff to understand and implement SB 1041 changes. Specifically the “WTW 24-Month Time Clock Decision Tree” and the “Hourly Requirements Tool” are comprehensive resources that simplify the complexities and illustrate an understanding of some of the more complex components of SB 1041.

Tehama County leveraged existing community and cross agency relationships to effectively operationalize SB 1041. The county holds quarterly meetings of the Administrative Oversight Team (AOT), a collaborative group of interested stakeholders that includes “almost everyone who works with CalWORKs clients.” It consists of representatives from the Employment Development Department, the Workforce Investment Act (now WIOA), and other agencies. The AOT brings together director and management levels of staff that are able to share best practices and on-the-ground intel to affect significant change for Tehama County CalWORKs clients.

Tehama County has co-located many client services. This includes the Community Action Agency (CAA), in a “Wraparound case model” co-located with welfare-to-work services. The CAA allows Tehama County to maximize grants, and uncover cross competencies, identify mutual customers and mitigate funding gaps. Clients are also offered strong Job Club services. Tehama County Job Club is centered on “high standards and consequences.” Tehama partnered with nearby Shasta County Community College to create the “Achieve” curriculum for client job seekers. Tehama County offers clients one stop workforce development and job skills training opportunities, which include specific classroom type instruction but also soft skills development and even attire for interviewing.

Tehama County is geographically expansive and the county has clusters of clients throughout. This population dispersion and the relative lack of public transportation has proved challenging for staff to maintain contact with clients, especially for in-home visits. The county has dedicated two full-time Social Service Aides to transporting clients to and from needed appointments and services. Overall, Tehama County has utilized its resources in unique and innovative ways to communicate and implement the policies contained in SB 1041. The data driven approach, co-located services, and community involvement allows Tehama County to provide welfare-to-work services to a culturally diverse and geographically remote client base.

Challenges

Tehama County has done an excellent job in the implementation of SB 1041 changes with little difficulty or cause for concern. However, Tehama County currently achieves a WPR that falls well below the federal requirement, and the county has experienced an almost 50 percent decline in WPR from 2008 (23.0 percent) to 2013 (12.1 percent). Generally the county faces challenges that stem from its large and predominantly rural geography, its diffuse population, relative lack of public transportation, restricted access to post-secondary educational facilities, and an unemployment rate that has been higher than the state average. Regardless, the county has shown initiative and inventiveness in facing these challenges.

Key Recommendations

Tehama County should continue to build on its impressive tradition of collaboration with nearby counties, community colleges, other agencies and the community as a whole. The data driven approach, and co-location of needed services should be maintained, and where possible, expanded. Tehama County should continue its innovative and cooperative culture and integration of research into its mission.

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