



CDSS

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DEPARTMENT OF SOCIAL SERVICES

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GOVERNOR

REASON FOR THIS TRANSMITTAL

- State Law Change
- Federal Law or Regulation Change
- Court Order
- Clarification Requested by One or More Counties
- Initiated by CDSS

June 23, 2016

ALL COUNTY INFORMATION NOTICE NO. I-46-16

TO: ALL COUNTY WELFARE DIRECTORS

SUBJECT: FEDERAL FISCAL YEAR 2017 PLAN TEMPLATE, PRELIMINARY ALLOCATIONS, REPORTING MEASURES, AND POLICY GUIDELINES FOR COUNTIES PARTICIPATING IN THE CALFRESH EMPLOYMENT AND TRAINING PROGRAM

REFERENCES: MANUAL OF POLICIES AND PROCEDURES, DIVISION 63, SECTIONS 63-407; 7 U.S.C. 2025 (h)(5); ADMINISTRATIVE NOTICE 16-20; FNS E&T TOOLKIT

This letter transmits the Federal Fiscal Year (FFY) 2017 CalFresh Employment and Training (E&T) preliminary allocations and the revised E&T template to be used by counties in submitting their FFY 2017 E&T plans. To assist counties in preparing their plans, this letter also transmits updated E&T policy guidelines and instructions for preparing reporting measures adopted by the Agricultural Act of 2014. These materials have already been informally transmitted to counties as Microsoft Word documents to enable them to prepare both the text and budgets for their CalFresh E&T plans.

Consistent with federal and state regulations, counties who want to participate in CalFresh E&T must submit a completed E&T plan to the California Department of Social Services (CDSS) for review and approval. Data from approved county plans will be incorporated into California's statewide E&T plan. The due date for counties to submit their E&T plans is July 11, 2016. Counties who fail to submit their plan timely without an approved extension may be denied participation in the E&T program during FFY 2017 and their 100 percent allocation may be redistributed among participating counties. CDSS has until August 15, 2016 to review, approve, and consolidate county plans into a state plan, which is forwarded to the Food and Nutrition Service (FNS) for review.

On April 25, 2016, FNS issued Administrative Notice 16-27 which transmitted preliminary 100 percent federal E&T allocations for FFY 2017. These allocations are subject to change, but have been released so that state agencies may begin preparing their 2017 E&T plan budgets. California's preliminary allocation for FFY 2017 is \$11,349,300.

Thirty-four counties have indicated their intent to operate an E&T program in FFY 2017. CDSS has withheld \$1,000,000 from the preliminary federal allocation to cover state administrative

costs and to provide workers' compensation coverage for program participants. The remaining \$10,349,300 has been distributed among E&T counties based on their average monthly non-assistance CalFresh caseload. The preliminary allocations are displayed on the attached table.

Nearly all counties will spend more than their 100 percent grant in administering their E&T programs. Such counties will be reimbursed for 50 percent of additional approved expenditures identified in their E&T plan budget. Counties may also be reimbursed for 50 percent of approved participant reimbursements including transportation and ancillary costs. Participant reimbursement for dependent care costs are limited to the actual amount paid or the Regional Market Rate, whichever is lowest. Dependent care costs paid by the county which are in excess of this limit must be paid with 100 percent county funds. Additional E&T funding information is contained in Part II of the attached policy guidelines.

The FNS has released an updated template for use by states when submitting their Supplemental Nutrition Assistance Program (SNAP) E&T plans. Entries were added to capture data for E&T reporting measures contained in the Agricultural Act of 2014 (P.L. 113-79). Several sections within the document were reformatted and the data requested in some sections has been revised. Portions of the previous template were eliminated.

The CalFresh E&T template has been amended to capture E&T plan data. The updated template must be used for plan completion and all previous versions of the template should be discarded. Counties must complete all sections and tables within the template. If certain optional provisions of the E&T template are not relevant to the county's E&T program, the county should indicate that these provisions are not applicable. E&T plans must be submitted in Microsoft Word using the document previously distributed to E&T counties.

The CDSS has attached revised policy guidelines to assist county staff in acquiring and/or maintaining a clear understanding of E&T terminology, funding rules, and participation requirements. The guidelines address a variety of key topics and are consistent with the federal E&T handbook transmitted by Administrative Notice 16-27. The attached instructions for E&T reporting measures echo instructions issued in the federal E&T handbook. It is essential that counties review these documents prior to preparing their E&T plans. It is also essential that counties have a clear understanding of the updated revised Stat 47 form and instructions issued in All County Letter (ACL) 14-91.

To ensure that all aspects of the county's E&T program are consistent with CDSS policies and procedures, all entities involved in the design and administration of E&T are encouraged to collectively meet on a regular basis. These meetings will foster a more cohesive approach to E&T administration and allow affected policy and fiscal units to share their expertise when addressing outstanding issues. Such interaction can positively contribute to the development of a quality E&T plan. Affected entities include those that have responsibility for the following functions:

- Preparing the E&T plan;
- Negotiating and overseeing contractual agreements;
- Developing the E&T budget;
- Managing E&T cases and monitoring program participation;
- Submitting E&T financial claims; and
- Compiling data for the STAT 47 report.

The template accompanying this All County Information Notice (ACIN) is a PDF file and is strictly for informational purposes. An e-mail transmitting a copy of the template as a Microsoft Word document was sent to E&T counties on June 3, 2016. A county should inform CDSS within three working days from the issuance of this ACIN if it did not receive a Microsoft Word copy of the E&T template. The county should e-mail updated contact information to Bill Belon at William.Belon@dss.ca.gov. The contact information should include the name, title, telephone number, fax, and e-mail address of the individual who has primary responsibility for preparing the E&T plan. A secondary contact person and his/her contact information should also be identified in case the primary contact is not available.

Please e-mail your E&T plan in Microsoft Word to Robert Nevins at Robert.Nevins@dss.ca.gov. It is not necessary for you to send a signed copy of the plan until it has been reviewed by CDSS staff and any requested revisions have been made. Upon receiving state approval of your E&T plan, please send a hard copy to CDSS using the following contact information:

ATTN: Mr. William Belon, CalFresh Analyst
California Department of Social Services
CalFresh Branch
744 P Street, M.S. 8-9-32
Sacramento, CA 95814

If you have questions regarding preparation of the STAT 47 report, please contact Sunit Mayall of the Data Systems and Survey Design Bureau at (916) 657-1642. If you have any questions about this letter or the preparation of your E&T plan, please contact Robert Nevins at (916) 654-1408, or Bill Belon at (916) 654-1905.

Sincerely,

Original Document Signed By:

KIM MCCOY WADE, Chief
CalFresh Branch

Attachments:
2017 County E&T Preliminary Allocation Table
2017 E&T Template
2017 E&T Reporting Measures
2017 E&T Policy Guidelines

County	Average Monthly Caseload 12 Months	% to Total	CalFresh E&T 100 % Federal Grant Allocation
ALAMEDA	61,925	0.038459	398,025
AMADOR	1,742	0.001082	11,200
CONTRA COSTA	32,410	0.020129	208,320
FRESNO	87,928	0.054609	565,167
HUMBOLDT	11,880	0.007378	76,357
KERN	59,550	0.036985	382,765
KINGS	9,704	0.006027	62,371
LASSEN	1,365	0.000848	8,777
LOS ANGELES	533,221	0.331164	3,427,319
MADERA	10,642	0.006609	68,400
MARIN	6,110	0.003794	39,270
MARIPOSA	1,036	0.000643	6,656
MENDOCINO	6,808	0.004228	43,761
MONTEREY	21,273	0.013212	136,734
NAPA	3,489	0.002167	22,423
ORANGE	97,841	0.060766	628,884
PLACER	9,262	0.005752	59,531
RIVERSIDE	118,893	0.073840	764,191
SACRAMENTO	92,398	0.057385	593,897
SAN BENITO	2,592	0.001610	16,659
SAN DIEGO	144,686	0.089860	929,984
SAN FRANCISCO	31,841	0.019775	204,660
SAN JOAQUIN	27,992	0.017385	179,923
SAN LUIS OBISPO	9,458	0.005874	60,794
SAN MATEO	15,649	0.009719	100,586
SANTA BARBARA	15,415	0.009574	99,082
SANTA CLARA	52,053	0.032328	334,575
SANTA CRUZ	13,295	0.008257	85,456
SHASTA	12,423	0.007715	79,847
SOLANO	21,081	0.013093	135,500
SONOMA	19,299	0.011986	124,046
STANISLAUS	39,932	0.024800	256,667
TRINITY	1,024	0.000636	6,581
VENTURA	35,922	0.022310	230,892
TOTALS	1,610,139	100.0000%	\$10,349,300

CalFresh E&T Reporting Measures for Federal Fiscal Year (FFY) 2017

Part I. Background

The Agricultural Act of 2014 established reporting measures for the Supplemental Nutrition Assistance Program (SNAP) Employment and Training (E&T) program. The measures are designed to assess improvements in the acquisition of skills, training, education, or work experience by those participating in E&T activities. The new language is contained in Section 16(h)(5) of the Food and Nutrition Act (7 U.S.C. 2025(h)(5)).

The United States Department of Agriculture (USDA) has released a final interim rule describing the reporting measures. The interim final rule was published in the Federal Register on March 24, 2016. Language identifying the requirements has been added to 7 CFR 273.7 (c). States are required to include reporting measures in their E&T plans for Federal fiscal year (FFY) 2017. Five separate reporting measures are established by the interim rule and states are required to use these measures to report annual outcome data in monitoring the effectiveness of their SNAP E&T programs. States are also required to identify appropriate reporting measures for each proposed component that will serve a threshold number of 100 participants per year and these measures must be identified in their State E&T plans.

Note: The minimum threshold number of 100 participant for E&T components applies to the entire state and not individual counties.

Part II. Instructions

Counties are required to prepare and submit annual reports to CDSS with outcome data for their E&T program as a whole as well as for individual components. The following sections details what information must be included in the county E&T plan regarding measures to be used in gathering data and provides guidance on data sources and sampling plans.

A. Annual Report

Counties are required to collect data on the National E&T Reporting Measures and must include in their E&T plans a clear description of how information for each E&T reporting measure will be collected, including the data source and the methodology used to obtain data for the annual report. The E&T reporting measures are similar to the performance indicators for the core programs in Workforce Innovation and Opportunity Act (WIOA) and to the extent possible, data collection may be coordinated with the state's labor agency. The reporting measures for the annual report are identified in the interim final rule at 7 CFR 273.7 (c).

The measures for which data must be gathered are as follows:

1. The number and percentage of E&T participants and former participants who are in unsubsidized employment during the second quarter after completion of participation in E&T;
2. The number and percentage of E&T participants and former participants who are in unsubsidized employment during the fourth quarter after completion of participation in E&T;
3. The median quarterly earnings of all the E&T participants and former participants who are in unsubsidized employment during the second quarter after completion of participation in E&T; and
4. The number and percentage of participants that completed a training, educational, work experience or an on-the-job training component.
5. The number of all E&T participants who:
 - a. Are voluntary vs. mandatory participants;
 - b. Have received a high school degree (or GED) prior to being provided with E&T services;
 - c. Are Able Bodied Adults Without Dependents (ABAWDs);
 - d. Speak English as a second language;
 - e. Are male or female;
 - f. Are within each of the following age ranges: 16-17, 18-35, 36-49, 50-59, 60 or older.
6. Of the number and percentage of E&T participants to be reported in measures (1) through (4) above, a disaggregation of the number and percentage of those participants based on the characteristics listed in item five, sections a, b, and c. A participant may have more than one characteristic.

Counties must report CalFresh E&T outcome data to CDSS in an annual report, which is due January 1 each year. The annual report must contain county totals for the measures identified in this section for the FFY ending the preceding September 30.

B. Individual Component Data

Additionally, counties must identify in their annual E&T plans appropriate reporting measures for each proposed component. In designing their E&T component reporting measures, counties may consider the following measures which are consistent with those identified in 7 CFR 273.7 (c)(6)(xvii) of the interim final rule:

1. The percentage and number of program participants who received E&T services and are in unsubsidized employment subsequent to the receipt of those services;

2. The percentage and number of participants who obtain a recognized credential, including a registered apprenticeship, or a regular secondary school diploma or its recognized equivalent, while participating in, or within 1 year after receiving, E&T services;
3. The percentage and number of participants who are in an education or training program that is intended to lead to a recognized credential, including a registered apprenticeship or on-the-job training program, a regular secondary school diploma or its recognized equivalent, or unsubsidized employment;
4. Measures developed by each county to assess the skills acquisition of employment and training program participants that reflect the goals of the specific employment and training program components of the county, which may include:
 - (a) The percentage and number of participants who are meeting program requirements in each component of the education and training program of the county;
 - (b) The percentage and number of participants who are gaining skills likely to lead to employment as measured through testing, quantitative or qualitative assessment, or other method; and
 - (c) The percentage and number of participants who do not comply with county mandated employment and training requirements and who receive a CalFresh E&T sanction.

Part III. Data Sources

Each county will determine the data source and the collection methodology it will use to gather data for the reporting measures, and include this information in its E&T plan. There are many data sources that counties should consider using, including the following.

- Quarterly wage record (QWR) information for the three national measures if access to this data is allowed by county law. QWR information is the intracounty and intercounty wages paid to an individual, the social security number (or numbers, if more than one) of the individual and the name, address, county, and the Federal employer identification number of the employer paying the wages to the individual.
- The National Directory of New Hires (NDNH). The NDNH is a database established pursuant to the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 to assist state child support agencies in locating parents and enforcing child support orders. Counties may also use NDNH for the purpose of administering CalFresh. NDNH includes data on New Hires, Quarterly Wage Information and Unemployment Insurance.

- Manually follow up with CalFresh E&T participants and former participants.
- Automated eligibility systems. Many states already have systems in place to track E&T participants who enter into employment and California is exploring development of an automation system that would capture this data.
- E&T tracking tools. When possible, counties could adapt workforce investment technology to track this activity. Or, counties may develop other tracking tools to gather the required data.
- Survey a sample of participants. For some reporting measures, a random sample of E&T participants and former participants may be used to obtain estimates of the required information. Counties electing use of a sample will be required to obtain approval through the E&T plan approval process.

Part IV. Sampling

Counties may use a random sampling methodology to gather the outcome data. If a county uses a random sample rather than tracking all E&T participants, the following sample sizes must be met.

Universe Size of E&T Participants for Reporting Measure	Reporting Measure Random Sample Size to be Completed
5000 and over	500
300 to 4,999	300
Under 300	All participants

Counties using a random sample must include its sampling plans in its E&T plan. All sampling procedures used by the county must be described, including:

- Sample Design. All sampling plans must conform to principles of probability sampling. A systematic sample designs for samples should be used because of its relative ease to administer and its validity, and because it yields a sample proportional to variations in the caseload over the course of the year. (To obtain a systematic sample, a county would select every “kth” case after a random start between 1 and k. The value of “k” is dependent upon the estimated size of the universe and the sample size.) The E&T plan must specify the method of sample selection.
- Sample Universe and Frames. The county must select from a sample frame. The county must ensure that sample frames accurately reflect their sample universes. The frame for active cases must list all households that participated in E&T in the fiscal year. The description of the sample frames must include: source, availability,

Attachment 2

accuracy, completeness, components, location, form, frequency of updates, and structure.

- Sample Size. The above chart contains the required sample size. This is the minimum number of cases which must be selected each year to for any reporting measure based upon the number of cases or individuals in the sample universe. The sample sizes assume that counties will use a systematic or simple random sample design.
- Sample Selection. The description of the methods of sample selection must include procedures for: estimating caseload size, computation of sampling intervals and random starts, as appropriate. A time schedule for each step in the sampling procedures must be included.

CalFresh Employment and Training (E&T)

County Template

COUNTY PLAN COVER SHEET

(To be completed by counties offering E&T in Federal Fiscal Year (FFY) 2017)

This template has been prepared by the California Department of Social Services (CDSS), CalFresh Branch. The template consists of instructions and entries to be used by counties in describing their E&T program. Several revisions and additions have been made to this document based on instructions released by the Food and Nutrition Service (FNS). County E&T plans will not be reviewed or approved unless they are submitted using the FFY 2017 E&T template.

Name of County:_____
Name of Primary E&T Contact:
Title:
Telephone:
Fax:
E-mail:
Name of Secondary Contact:
Secondary Contact Title:
Secondary Contact Telephone:
Secondary Contact E-mail:
Date Submitted:

INTRODUCTION

FNS has released an updated handbook and templates for use by states when submitting their Supplemental Nutrition Assistance Program (SNAP) E&T plans. The federal handbook was amended for greater consistency with current SNAP law, regulations, and policies. Entries were added to capture data for E&T reporting measures contained in the Agricultural Act of 2014 (P.L. 113-79). Several sections within the document were reformatted and the data requested in some sections has been revised. Portions of the older federal handbook have been eliminated.

This document has been developed for counties and contains those entries required by the new FNS template. Explanatory text is included to assist counties in preparing their E&T plans. CDSS strongly recommends that counties read the attached policy guidelines which are regularly updated to reflect existing federal E&T programmatic and funding requirements and options. The policy guidelines also contain a glossary which defines key words and phrases used in the E&T program. Counties may also want to read the E&T Toolkit, which contains policy guidance and useful program tools. The E&T Toolkit can be found on the SNAP Employment & Training webpage, under E&T Policy and Guidance at: <http://www.fns.usda.gov/ET-policy-guidance>.

PART I.
ASSURANCES

Assurance Statement	
Check box at right to indicate you have read and understand each statement.	
<ul style="list-style-type: none"> The county is accountable for the content of the E&T plan and will provide oversight of any sub-grantees. 	<input type="checkbox"/>
<ul style="list-style-type: none"> The county is fiscally responsible for E&T activities funded under the plan and is liable for repayment of unallowable costs. 	<input type="checkbox"/>
<ul style="list-style-type: none"> Education costs will not be supplanted with Federal E&T funds. 	<input type="checkbox"/>
<ul style="list-style-type: none"> Cash or in-kind donations from other non-Federal sources have not been claimed or used as a match or reimbursement under any other Federal program. 	<input type="checkbox"/>
<ul style="list-style-type: none"> If in-kind goods and services are part of the budget, only public in-kind services are included. No private in-kind goods or services are claimed. 	<input type="checkbox"/>
<ul style="list-style-type: none"> Documentation of county costs, payments, and donations for approved E&T activities are maintained by the county and available for Federal review and audit. 	<input type="checkbox"/>
<ul style="list-style-type: none"> Contracts are procured through competitive bid procedures governed by State procurement regulations. 	<input type="checkbox"/>
<ul style="list-style-type: none"> Program activities are conducted in compliance with all applicable Federal laws, rules, and regulations including Civil Rights and OMB regulations governing cost issues. 	<input type="checkbox"/>
<ul style="list-style-type: none"> E&T education activities directly enhance the employability of the participants; there is a direct link between the education activities and job-readiness. 	<input type="checkbox"/>
<ul style="list-style-type: none"> Program activities and expenses are reasonable and necessary to accomplish the goals and objectives of CalFresh E&T. 	<input type="checkbox"/>
<ul style="list-style-type: none"> The E&T Program is implemented in a manner that is responsive to the special needs of American Indians on Reservations. Counties shall regularly consult ITOs regarding portions of their E&T plan which affect them and if appropriate, and to the extent practicable, include ITO 	<input type="checkbox"/>

Assurance Statement	
Check box at right to indicate you have read and understand each statement.	
suggestions in the E&T plan.	

By signing this page, the County Director and financial representative certify that the above assurances are met.

Certified By:

County Director

Date

Certified By:

Financial Representative

Date

**PART II.
COUNTY E&T PROGRAM, OPERATIONS AND POLICY**

This part summarizes the E&T program that the county plans to implement. In this part, counties provide a narrative description of their E&T program, identify any substantive changes they intend to make, describe operational procedures for issuing participant reimbursements and gathering work registrants, and specify how they will collect data for purposes of satisfying E&T reporting measures. Additional miscellaneous information is requested. Please complete the following entries:

A. Program Summary

Please provide a short summary of your county's E&T program. The summary should list the county's E&T components, identify the organizations involved in administering E&T, and note the types of expenditures for which participants will be reimbursed. This should be a succinct overview with details incorporated in the appropriate plan sections.

B. Program Changes

Describe the nature of the changes being made to the E&T program. Examples of program changes include the addition or removal of E&T components, a shift in the county's E&T target population(s), or a change in the types of expenditures and services for which participants will be reimbursed.

C. One-Stop System

Describe the local/regional one-stop system and identify those E&T components, if any, that will be delivered by, or in partnership with one-stop providers. Include information about target or emerging industries in the county, career pathways and/or credentials that will be made available to participants.

D. Other Employment Programs

Describe other employment and training programs that serve WIOA/CalWORKs/General Assistance recipients and how the CalFresh E&T program will interface with them. This includes coordination between the CalWORKs welfare-to-work program (under title IV-A) and the CalFresh E&T program, including administrative consolidations and shared components. FNS requests this information to ensure CalFresh E&T funds are not spent on CalFresh recipients who also receive title IV-A assistance. FNS also requests this information to ensure proper lines of communication are in order to support dual disqualification.

E. CalFresh Applicants

Counties have the option to refer CalFresh applicants to E&T programs prior to eligibility determination. Specify whether applicants will be referred to E&T programs.

F. Screening process

Describe the process for screening work registrants for referral to E&T.

G. Participant Reimbursements

Provide a comprehensive list of all allowable participant reimbursements provided in the county for each component and note any cap (if there is one) placed on each type of reimbursement. Describe the procedure for issuing reimbursements (in advance, in arrears, or upon request), and any steps taken to monitor their use.

H. Reporting Measures

The county must include a clear description of how information for each E&T reporting measure described in **Attachment 2** will be collected, including the data source and the methodology used to obtain data for the annual report. If the county is using a sampling method, all sampling procedures used by the county must be described, including the sample design, its universe and frames, the sample size, and the sample selection.

Note: This section satisfies the requirement in Welfare and Institutions Code Section 18926.5 (c) regarding a county's need to demonstrate effective use of E&T funds.

I. Disqualification policy

A nonexempt individual who refuses or fails to comply with CalFresh work requirements and is determined to be without good cause for doing so will be subject to CalFresh sanctions for one, three, or six months, depending on the instance of noncompliance. Voluntary E&T participants are not subject to CalFresh sanctions for failure to comply with E&T. If participation in E&T is mandatory, please describe the county's sanction process, including its procedures for good cause and issuing notices of disqualification.

Note: All-voluntary counties should enter **N/A** in this section since CalFresh sanctions are not applicable.

PART III.
E&T COMPONENT DETAIL

Note: Prior to completing this part, counties are encouraged to read the description of E&T program components contained in Part III of the FFY 2017 E&T Policy Guidelines.

In this part, counties must provide a detailed and clearly written description of each E&T component being offered in FFY 2017. Components will only be approved if required activities and hours of participation are consistent with federal and state E&T requirements. County-specific acronyms should first be spelled out prior to their use throughout the plan.

In completing this section, counties must remember the following:

- Assessment by itself is not a component/activity, but is offered in combination with E&T components.
- Screening for work registration and deferral status is not a component/activity and cannot be funded with E&T dollars.
- Hours of participation in a workfare, self-initiated workfare, or work experience component are determined by dividing the household's monthly CalFresh allotment by the higher of the federal or state minimum wage. The minimum wage in California is currently \$10.00 per hour and the federal minimum wage is \$7.25. E&T volunteers can choose to participate for additional hours beyond this limit, but are not required to do so.
- When a county offers 30-day job search prior to workfare, this activity must be included in the component description for workfare. The 30-day job search activity is not a separate component, but is considered part of workfare. Therefore, counties should not use a separate component template for this activity.
- When a component includes concurrent activities, the component name must reflect all the activities associated with that component, e.g., Job Club/Job Search.
- To be considered acceptable, an E&T component should typically involve a minimum of 12 hours per month.
- The maximum number of hours that can be required of an E&T mandatory participant is 30 hours per week or 120 hours per month. E&T volunteers may choose to participate for additional hours beyond this limit.
- If anti-drug, anti-alcohol and mental health discussions are offered, these activities must be described in the component summary for each component to which they are linked. For example, if generalized anti-substance abuse discussions are offered as part of vocational training, a description of these services must be included in the component summary for this activity. Note: Consistent with federal policy instructions contained in the E&T toolkit which was transmitted to states by Administrative Notice 11-16, anti-substance abuse and mental health services funded with E&T dollars are limited to those activities described in Part III of the FFY 2017 E&T Policy Guidelines.

- If job retention services are included in the county's E&T program, a complete description of these services must be provided using the component description template.
- If an E&T component is a voluntary component, CalFresh sanctions must not be imposed for failure to comply with participation requirements. Language must be included in the component description which identifies the component as a voluntary activity and clarifies that sanctions are not imposed for noncompliance.
- Counties are prohibited from supplanting State education costs with Federal E&T funds. The county must clarify whether education activities will be charged to the E&T program and justify these expenses. This justification must include a discussion of why such costs are attributed to the E&T program and cannot be met through other existing education programs. The county must address whether the services being provided are available to persons other than E&T participants and if so, what the cost is for those persons.

Use the following entries in describing the county's E&T components.

- A. Component Name- List the name of the component.
- B. Component Description - Provide a detailed description of the E&T component. The component description should identify such things as the activities that comprise the component, the sequence of activities if the component is multi-faceted, specific tasks performed by the participant as part of his/her participation in the component, and the types of reimbursement and services provided to assist participants in effectively satisfying participation requirements. Please be thorough and specific.
- C. Participation Requirements - Identify the length of the component and the weekly/monthly participation requirements. If the component involves more than one activity (e.g., job search and workfare), identify the participation requirements for both activities and explain whether these activities are offered sequentially or concurrently.
- D. Component Administration and Organizational Responsibilities - Explain whether the component will be offered by the county, a contractor, a community partner, or a combination of providers. Identify the various entities involved and their respective roles in administering the component. Organizational responsibilities include such things as E&T planning, training parties involved in delivering the component, assessing participants' skills and needs, conducting training in E&T activities such as job club and work experience, referring participants to one-stop centers and service providers, providing one on one case management directly related to E&T participation, issuing participant reimbursements, monitoring and tracking E&T participation, making good cause determinations, and issuing notices of disqualification for noncompliance with mandatory E&T component requirements. If the county delivers the component through a contractor or other

service provider(s), a description of how the component is administered shall be included.

- E. Geographic Areas Covered - Identify those geographic areas within the county in which the component will be operative. The component may be offered countywide or the county may choose to limit the component to specific districts, neighborhoods, college campuses, etc.
- F. Targeted Populations - Identify who among the CalFresh population is targeted to participate in the component (see Part IV of the Policy Guidelines for additional information).
- G. Participant Estimates – Identify the unduplicated count of participants anticipated each month.
- H. Recipients of Participant Reimbursements - Identify the unduplicated count of persons who will receive participant reimbursements each month.
- I. Monthly Cost of Administration – Identify the anticipated cost of administering the component each month. This includes the average monthly costs for salary and benefits, overhead expenditures, and contracts. Do not include participant reimbursements.
- J. Monthly Cost of Participant Reimbursements – Identify the anticipated cost per month for participant reimbursements.
- K. Reporting Measure(s) – Identify the specific reporting measure(s) that will be used for this particular component in acquiring data for the annual reports (see Enclosure 2).

PART IV.
WORK REGISTRANTS, ABAWDS, AND E&T DEFERRALS

This part consists of county estimates of work registrants, deferred E&T participants, and ABAWDs for the upcoming fiscal year.

Some Helpful Tips and Reminders

In developing their estimates of work registrants and ABAWDs, it is essential that counties have an accurate understanding of those CalFresh recipients who should be included in these populations. Counties should remember the following in preparing their estimates:

- The work registrant population is the largest population captured in the template.
- The ABAWD population is a subset of the work registrant population. ABAWDs and work registrants are not distinct unrelated groups, but the ABAWD population is a smaller population within the work registrant population.
- There are always fewer ABAWDs in the county than there are work registrants because additional exemptions have been established for the ABAWD work requirement, which are not included in the list of work registration exemptions (see Part VI of the Policy Guidelines for a listing of work registrant and ABAWD exemptions).
- Persons who do not qualify for an ABAWD exemption are counted as ABAWDs even if they reside in a county with an ABAWD waiver, or are granted the 15 percent ABAWD exemption. Such persons are not considered exempt from the ABAWD work requirement.

Once a county has estimated the size of its work registrant population, it should use this population as its base for determining estimates for the number of ABAWDs in the county. To estimate the size of the county's ABAWD population, counties may take the following steps:

1. Estimate the number of work registrants who qualify for the ABAWD exemptions based on age (under 18 or over 49), pregnancy, and living in a CalFresh household with a child under age 18;
2. Deduct the total of item #1 from the overall work registrant count;
3. Use the resulting figure from item #2 as the estimated ABAWD population.

Relationship of the E&T Template to the STAT 47 Report

The quarterly STAT 47 data report is used to gather federally required work registrant and E&T participation data that is transmitted to the Food and Nutrition Service using the FNS 583 E&T Program Activity Report. Effective January 6, 2015, the STAT 47 and STAT 48 forms have been significantly revised and consolidated into a single report

(See All County Letter (ACL) 14-91). The new report is entitled “Non-Assistance CalFresh Work Registrants, Able-Bodied Adults Without Dependents (ABAWD), and Employment and Training (E&T) Program Quarterly Statistical Report STAT 47 (10/14).”

The Food and Nutrition Service (FNS) uses the number of work registrants identified on the STAT 47 report as the primary source for determining the annual amount of E&T funds allotted to each state. Thus, it is essential that counties regularly review the STAT 47 report to ensure that work registrant numbers appear reasonable when compared with the size and demographics of the non-assistance CalFresh population. Inappropriately small work registrant counts will lead to a reduction in the size of California’s 100 percent E&T federal grant. The data from the STAT 47 also provides counties with a starting point in developing work registrant and ABAWD estimates for inclusion in this part. Counties are encouraged to review the updated STAT 47 and accompanying instructions before completing this portion of the plan.

The October 1 counts required in Section A-1 and Section C-1 of this Part are a point-in-time count of work registrants and ABAWDs residing in the county on October 1. This is not a cumulative count for the previous fiscal year, the previous month, nor is it a count of the work registrants anticipated for the month of October. Instead, only work registrants and ABAWDs actually living in the county on October 1 are counted. Point-in-time counts for work registrants and ABAWDs are captured in Part F, entries 28 and 29 of the STAT 47.

Part A of the revised quarterly STAT 47 report gathers unduplicated counts of all new work registrants and all new ABAWDs added each quarter. The cumulative total of four STAT 47 reports may be helpful in preparing estimates for the number of new work registrants for entries A-2 and C-2 of this part.

A. Work Registrant Population

1. Identify the estimated number of work registrants in the existing CalFresh caseload expected to be in the county on October 1, 2016. - _____
2. Identify The anticipated number of new work registrants to be added between October 1, 2016 and September 30, 2017. - _____

This estimate may be consistent with the cumulative total of four consecutive quarters worth of data from Part A, entry 1 of the STAT 47 report. However, counties may need to consult additional sources in developing reasonable estimates.

3. Identify the total number of anticipated work registrants residing in the county for the Federal Fiscal Year (1+2=3). - _____
4. Identify the sources used and methods employed to prepare work registrant estimates.

B. Deferral Policy

Counties may temporarily defer work registrants from E&T participation. E&T deferrals are listed at Manual of Policies and Procedures (MPP) Section 63-407.811. Counties may also defer work registrants for reasons not included in CDSS regulations. However, additional deferral categories should be identified in the table below for review and approval by CDSS.

Effective January 1, 2012, Senate Bill 43 added new deferral criteria to which all E&T counties must adhere, irrespective of their existing deferral policies. Work registrants must be deferred from participation if they are:

- Under 18 years of age or 50 years of age or over;
- Living in a CalFresh household with a child under the age of 18, regardless of whether or not the child is receiving, or is eligible to receive, CalFresh benefits; or
- Living in a federally determined work surplus area.

With the passage of SB 134, work registrants who are veterans that have been honorably discharged from the United States Armed Forces shall also be deferred from CalFresh E&T. This new deferral took effect January 1, 2015. Policies established by SB 134 and implementation instructions are contained in ACL 107-13 dated December 30, 2013.

Note: Those counties in which all E&T components are voluntary activities and those counties that have been designated as a Labor Surplus Area in their entirety are not required to include estimates in this section. Counties that meet either of these criteria should identify themselves as voluntary or work surplus counties in this section and the deferral table should either be deleted or untouched.

Using the table below, identify the county’s E&T deferral criteria and the estimated number of persons who will be deferred:

Reason For Deferral	Number of Work Registrants Deferred
(a) living in a federally determined work surplus area	
(b) lacks dependent care	
(c) lacks transportation to an E&T Program site	
(d) lives an unreasonable distance from the E&T program site	
(e) has a severe family crisis	

(f) temporarily unemployed and expected to return to work within 60 days	
(g) involved in legal difficulties	
(h) has a temporary illness or disability	
(i) under the age of 18 or 50 years of age or older	
(j) living in a CalFresh household with a child under the age of 18 regardless of the child's CalFresh status	
(k) is pregnant	
(l) is an honorably discharged United States veteran	
(m) Other	
total number of deferred work registrants [add (a) through (m)]	

C. ABAWD Population

See the instructions at the beginning of Part IV prior to completing this section.

1. Identify the estimated number of ABAWDs in the existing CalFresh caseload expected to be in the county on October 1, 2016. - _____
2. Identify The anticipated number of new ABAWDs to be added between October 1, 2016 and September 30, 2017. - _____

This estimate may be consistent with the cumulative total of four consecutive quarters worth of data from Part A, entry 2 of the STAT 47 report. However, counties may need to consult additional sources in developing reasonable estimates.

3. Identify the total anticipated number of ABAWDs residing in the county for the Federal Fiscal Year (1+2=3). - _____
4. Identify the sources used and methods employed to prepare ABAWD estimates.

**PART V.
PARTNERSHIPS/CONTRACTS.**

In the table below, list each partner/contract providing CalFresh E&T services. Summarize the total cost of each contract and calculate the percentage of that cost of the E&T operating budget.

Note: For each partner/contractor that receives more than 10% of the E&T operating budget, complete and attach a Contractor Detail Addendum (see Exhibit 1).

Table 1: Partnerships/Contracts

Name of Partner/Contract	Cost	% of E&T Operating Budget
Insert more rows as needed		

PART VI.
OPERATING BUDGET

Complete the operating budget table, providing line item detail and the program total. If there are contracts, enter the total contract amount. Additional detail on contracts should be provided in Part V and the Contractor Detail Addendum.

Note: See Part VII (Budget Narrative and Justification instructions) for guidance on budget categories.

Table 2: Operating Budget

<u>Type Of Expenditure</u>	County cost	Federal cost	Total
A. Direct Costs:			
1) Salary/Wages			
2) Fringe Benefits* Approved Fringe Benefit Rate Used _____%			
3) Contractual Costs			
4) Non-capital Equipment and Supplies			
5) Materials			
6) Travel			
7) Building/Space			
8) Equipment & Other Capital Expenditures			
Total Direct Costs			
B. Indirect Costs:			
Indirect Costs*Approved Indirect Cost Rate Used: _____%			
Total Indirect Costs			
C. In-kind Contribution			
County in-kind contribution			

D. Participant Reimbursement:			
1) Dependent Care			
2) Transportation & Ancillary Costs			
<u>E. Total Costs</u>			

PART VII.
BUDGET NARRATIVE AND JUSTIFICATION INSTRUCTIONS

Provide a budget narrative that explains and justifies each cost and clearly explains how the amount for each line item in operating budget was determined.

A. Direct Costs: Explain all direct costs to the program

1) Salary/Wages

Staff position should be described in FTE and time spent on the project.

Example:

E&T Program Manager

$\$60,000 \times .50 = \$30,000$

5 E&T Counselors

$\$25,000 \times 1.00 \times 5 = \$125,000$

2) Fringe Benefits

If charging fringe benefits to the E&T program, provide the approved fringe rate.

3) Contractual Costs

Give the total cost of contractual services and briefly summarize what services will be provided.

4) Non-capital Equipment and Supplies

Describe non-capital equipment and supplies to be purchased with E&T funds.

5) Materials

Identify materials to be purchased with E&T funds.

6) Travel & Staff Training

Describe the purpose and frequency of staff travel charged to the E&T program. Include planned staff training, including registration costs for training that will be charged to E&T. This line item should not include E&T participant reimbursements for transportation.

7) Building/Space

If charging building space to the E&T program, explain the method used to calculate space value.

8) Equipment & Other Capital Expenditures

Identify equipment and other capital expenditures over \$5,000 per item that will be charged to the E&T grant.

B. Indirect Costs:

Indirect costs (also called overhead expenditures) are the costs of allowable activities that support the E&T program but are charged directly to the county. Specify the items

included in this category, identify the dollar amount for indirect costs, and include an indirect cost rate if one is used.

C. In-kind Contribution

FNS defines in-kind contributions as non-cash contributions, usually the value of volunteer time or donated space. Per CalFresh rules, only governmental entities may receive reimbursements for in-kinds. If claiming expenses in this line, please be specific about the valuation of in-kind contributions.

D. Participant Reimbursement:

1) Dependent Care

Specify payment rates for child care reimbursements established in accordance with the Child Care and Development Block Grant and based on local market rate surveys. If alternative dependent care is provided by the county or other provider, describe arrangements and identify anticipated costs.

2) Transportation & Ancillary Costs

List the reimbursements provided and identify the total cost for transportation and ancillary reimbursements.

PART VIII.
SUMMARY OF E&T BUDGET FOR FFY 2017

Using Table 3, break out E&T expenditures by funding category. Do not use decimals within the table. Use whole dollars only. The combined total of items 1 and 2c in Table 3 must match the combined total of Sections A (direct costs), B (indirect costs), and C (in-kind expenditures) in Table 2. The entries for dependent care and ancillary totals in Table 3 must match Table 2 expenditures. If the entry is not applicable or is zero, please insert a "0" (zero) in the blank space. Blank budget entries lengthen the plan review process.

TABLE 3: FFY 2017 PLANNED COSTS BY FUNDING CATEGORY

COUNTY: _____

	<u>Funding Categories</u>	<u>Estimates of Cost</u>
1	100 Percent Federal E&T Grant	
2	Overmatch for Administration Cost	
2a	50 Percent Federal	
2b	50 Percent County	
2c	<u>Subtotal</u> for Overmatch (2a + 2b)	
3	Participant Reimbursement for Transportation/Ancillary	
3a	50 Percent Federal	
3b	50 Percent County	
3c	<u>Subtotal</u> for Transportation/Ancillary (3a + 3b)	
4	Participant Reimbursement for Dependent Care	
4a	50 Percent Federal	
4b	50 Percent County	
4c	<u>Subtotal</u> for Dependent Care (4a + 4b)	

5	Grand Total of Planned Cost (1+2c+3c+4c) Must agree with Table 2's Grand Total Cost	
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Exhibit 1: Contractor Detail Addendum

Counties must complete the table contained in this section for each partner or contract that receives more than 10% of the E&T operating budget as specified in Part V. The suggested length is not more than 2 pages for each project. If information is identical for multiple contractors, a single addendum can be submitted, so long as this is explained, the contractors are identified, and a completed addendum is attached to the county E&T plan.

The table below must contain the following information. If the county uses more than one Partner/Contractor, please create and attach a copy of this table for each of them.

- Partner/Contract Name: Name of partner or contractor
- Monitoring and communication with contractor (s): Describe the county's ongoing oversight and communication procedures that will be in place to monitor contractors' performance and communicate policy changes.
- Role of Contractor: Briefly describe the role of the contractor. What responsibilities are included in the contract? Example: Assessment, placement, E&T service delivery, participation tracking, etc.
- Timeline – Start: Month and year, quarter, or annual/ongoing.
- Timeline – End: Month and year, quarter, or annual/ongoing.
- Description of Activities/Services: Provide a detailed description of the services provided.
- Funding: Describe the funding structure of the contract. Is the contract funded with 100% E&T grant money or 50% reimbursements? Will the contractor provide the county's share of E&T expenditures?
- Evaluation: Explain how the contract will be evaluated and monitored.

Partner/Contract Name	
Monitoring and communication with contractor (s)	
Role of Contractor	

Attachment 3

Partner/Contract Name			
Timeline	Start		End
Description of Activities/Services			
Funding			
Evaluation			

Policy Guidelines for Counties Offering a CalFresh Employment and Training Program

INTRODUCTION

This document has been prepared by the California Department of Social Services (CDSS) to provide counties with policy guidelines and program definitions for the CalFresh Employment and Training (E&T) program. These guidelines may serve as a helpful tool for counties as they administer E&T and prepare E&T plans. Counties are encouraged to read this document prior to preparing their E&T plan for Federal Fiscal Year (FFY) 2017.

In preparing an E&T plan, it is essential that counties have a clear understanding of the updated revised Stat 47 form and instructions issued in All County Letter (ACL) 14-91. Counties are also advised to review ACLs 12-03 and 13-107 which define changes to E&T adopted with the passage of Senate Bills (SB) 43 and SB 134. CDSS also recommends that counties read All County Information Notice (ACIN) I-01-13 as it addresses questions related to work registration. Finally, counties with questions about the use of E&T funds not answered in this document may find the help they need within the federal E&T funding questions and answers transmitted via ACIN I-50-07, dated September 28, 2007. Additional programmatic and funding information is contained in the E&T Toolkit which may be found on the SNAP Employment & Training webpage, under E&T Policy and Guidance at: <http://www.fns.usda.gov/ET-policy-guidance>.

Questions not addressed in these guidelines may be directed to Robert Nevins of the CalFresh branch either by telephone at (916) 654-1408 or via e-mail at Robert.Nevins@dss.ca.gov.

PART I. THE E&T PLAN

A. Plan Submission and Modifications

Counties who wish to participate in the E&T program must submit a CalFresh E&T plan. The plan contains a narrative description of the county's E&T program as well as financial estimates for the costs of administering the program and providing participant reimbursements. Each year, CDSS issues an updated template for use by counties in preparing their plans. Counties receive a Microsoft Word copy of the template which helps expedite the process for plan preparation and review. Data from individual county plans is consolidated into a state plan which is submitted to the Food and Nutrition Service (FNS) by August 15 prior to the beginning of the FFY.

When a county proposes to make any substantive change to its E&T program after its E&T plan is approved, the county shall submit a plan modification request to CDSS. The modification request must be approved by CDSS and FNS before the proposed change(s) may be implemented. The county may be liable for costs associated with the

implementation of any change that occurs prior to approval by FNS and CDSS. The following are examples of changes that require a formal modification of the county E&T plan:

- Major changes in components (e.g., adding, deleting, or modifying a component);
- Requests for additional 100 percent Federal E&T grant funds, over and above the county's annual grant allocation;
- Changes in the amount of expenditures expected to exceed the 100 percent E&T grant level for which the county will request 50 percent Federal reimbursement;
- Change in the method of paying participant reimbursements;
- Significant change in funding sources, such as new third-party funding that accounts for more than 10 percent of the county's CalFresh E&T budget; or
- Adding a contractor that will account for more than 10 percent of the county's E&T budget.
- Termination or modification of primary contractual agreements; or
- Implementation of a pilot project or third party match model.

When submitting an amended plan, counties must edit the original plan and re-submit it as a Microsoft Word document. A thorough cover letter must be attached describing the proposed change(s). Counties must be careful to ensure that appropriate amendments are made to all parts of the plan impacted by the programmatic or budgetary amendments. The county may want to contact CDSS for assistance in determining those sections within its E&T plan that will be affected by the proposed modification. E&T plan revisions should be submitted to CDSS in a timely manner in order for CDSS to acquire federal approval if needed and make any necessary adjustments to the state E&T plan

Changes that do not affect the participation levels or component cost do not need prior approval, including:

- Substitution of one contractor for another that does not affect the scope or operation of a component; or
- Change in the targeted population of a component (for example, shifting the focus of a GED preparation component from illiterate adults to high school dropouts between 18 and 20 years of age).

B. Requests for Additional 100 Percent Funds

FNS allocates a \$90 million grant to states, annually, for the purpose of administering and operating their E&T programs. Funds from this grant are 100 percent federal dollars and require no state/county match. These funds are often referred to as "100 percent funds" because no state/county match is required to spend these funds.

Depending upon a county's requests, FNS will reallocate the unobligated, unexpended portion of the \$90 million grant to other states/counties during the year on a first come, first serve basis. These funds are available for FNS to reallocate for 24 months after the start of the FFY. Counties are encouraged to quickly assess their funding needs and let CDSS staff know of those needs as soon as possible.

Counties may request additional 100 percent funds at any time during the FFY provided that the county can amend its plan and obligate additional funds before the FFY ends. Counties should be aware that in order to maximize their opportunity for consideration of additional funds, they should submit their request as soon as possible. Interested counties must submit their request for additional funds in writing to CDSS who will forward the requests to FNS. FNS will determine if the requests are reasonable and necessary. If the request for 100 percent funds is approved, FNS will allocate funds to meet some or all of the counties' request, as it deems appropriate and equitable based upon availability of funds.

In reviewing requests, FNS will consider the completeness of the county's request to support, expand upon, or enhance its existing E&T program. Requests must provide detail on the following:

- the specific amount of additional funds requested;
- the detailed description for the use of additional funds including identification of new or existing services or initiatives the additional funds will support, costs of these services, partners involved, and any other helpful details;
- the location (county, city, or other geographic area) for which the services will be provided;
- the targeted population to receive the services supported by additional funds;
- an estimated number of participants to be served in each component and;
- how the proposal enhances existing services or builds new opportunities for participants to gain access to employment and training services.

C. Considerations Prior to Plan Submission

Both CDSS and FNS urge counties to consider the following when designing their E&T programs. These suggestions have been adapted from those included in the federal E&T handbook.

1. A comprehensive client initial assessment and ongoing case management are keys to an effective E&T program.

A strong comprehensive initial assessment collects general information about demographics, educational attainment, basic skills, literacy, work experience, and public benefits. It also assesses objective and subjective barriers to work, such as disabilities, criminal background, family composition, housing circumstances, childcare needs, and transportation needs.

Comprehensive case management services may help individuals navigate identified barriers and challenges that they face in obtaining and retaining employment. E&T case managers play a critical role in helping participants successfully obtain and retain employment. In an effective case management model, the case manager guides, motivates and supports job seekers by continually assessing their needs and barriers, identifying resources, and advising on career and training opportunities.

2. Assessment of County Resources and Needs.

During the E&T Planning process counties should continuously evaluate their CalFresh E&T program by conducting an assessment of county resources and needs. Some of the elements that might be included in this assessment include consideration of collaborating with other entities in the county in the delivery of E&T services, such as Workforce agencies, community colleges and community based organizations.

3. Incorporating Job-Driven Elements into CalFresh E&T Programs

To achieve economic self-sufficiency and reduce their need for food assistance, CalFresh recipients must have opportunities to increase their skills and gain work experience through job-driven CalFresh E&T programs. Incorporating job-driven elements into your county's E&T program and plan requires thoughtful planning with your county's workforce and education systems. Counties should engage with employers and local industries when designing CalFresh E&T programs and components. Inviting businesses to the table to help design curricula and provide work experience can help ensure that participants are learning the necessary skills they will need to compete for available jobs in their community. Counties should also work with local workforce boards, which can identify and describe high-demand sectors.

4. Create opportunities for individuals to earn postsecondary credentials that employers value, including certificates and degrees, industry-recognized credentials, and licensures.

The opportunity to earn credentials that are widely recognized by employers will best position a CalFresh E&T participant to compete for a good-paying job that reduces or eliminates their need for food assistance.

5. Encourage flexible and innovative instructional models that accelerate learning and transitions to employment.

A growing body of evidence shows that individuals with low foundational skills are more likely to succeed in programs that offer flexible scheduling, contextualized and accelerated instruction and wraparound supportive services. These models have been proven to be more successful than traditional, sequential approaches, e.g. a stand-alone high school equivalency preparation course.

For individuals with very low skills, counties may fund the initial steps of an individual's career pathway through CalFresh E&T where other education and workforce programs leave gaps, such as helping college-ready adults without a high school diploma gain access to post-secondary education. Counties may also use braided funding approach to deliver a continuum of services and supports using multiple sources of federal, county, and local funds.

6. Promote work-based education and training to help individuals earn while they learn.

Counties can design components that allow E&T participants to gain valuable work experience in their chosen career, improving their likelihood of landing a job in their field upon completion of an E&T program. Such work experience or work-based learning can include internships, pre-apprenticeships, Registered Apprenticeships, or other on-the-job training.

7. Provide robust support services to address barriers to success.

Unlike most other workforce programs, counties are required to provide payments or reimbursements for expenses directly related to participation in an E&T component, such as transportation, books, course fees, and dependent care. Counties should take full advantage of this flexibility to provide robust supportive services to CalFresh E&T participants, who often have multiple or very serious barriers to employment. Such barriers may include poor health and lack of affordable child care.

8. Make connections with other education and training systems, partner organizations, and institutions, such as community colleges and community-based organizations.

CalFresh recipients may interact with or benefit from a multitude of services provided by a variety of organizations and programs such as food banks, private charities, faith-based organizations, American Job Centers, adult education providers, and community colleges. Developing partnerships with these other organizations can significantly benefit CalFresh E&T participants and enable counties to use scarce resources more efficiently.

D. Maintaining a Cohesive E&T Program

All entities involved in the preparation of the E&T plan and administration of the program are encouraged to hold regular meetings to ensure that all aspects of the county's E&T program, including the written plan, are consistent with CDSS policies and procedures. Such meetings will foster a more cohesive approach to E&T administration and allow affected policy and fiscal units to share their expertise when addressing outstanding issues. Affected entities include those that have responsibility for the following functions:

- Preparing the E&T plan;
- Negotiating and overseeing contractual agreements;
- Developing the E&T budget;
- Managing E&T cases and monitoring program participation;
- Submitting E&T financial claims; and
- Compiling data for the Stat 47 report.

PART II. E&T FUNDING

Note: Much of the information contained in this section was taken from the federal E&T toolkit which was released by FNS in Administrative Notice 11-16.

A. Overview of the E&T Funding Process

As discussed above, each state receives an annual 100 percent federal allocation to administer its E&T program. In California, this allocation is distributed among those counties that have chosen to participate in E&T based on their average monthly caseload. Counties who wish to spend additional dollars administering their E&T program can receive federal reimbursement for 50 percent of their approved administrative costs. The FNS also reimburses 50 percent of allowable expenditures for participant reimbursements including transportation, dependent care, and allowable ancillary expenditures.

Financial information is reported on a county expense claim and includes claims for the 100 percent federal grant, and 50 percent federal reimbursements for program administration and allowable products and services provided to participants. The claim is due 30 days after the end of each federal fiscal quarter. Counties complete financial tables within their E&T plan which break out their proposed budget based on types of program expenditures as well as the amount of federal and county dollars that will be spent on E&T administration and on participant reimbursements.

B. Allowable Administrative Costs

Allowable administrative costs are operational costs for E&T, which include all administrative expenses that are reasonable and necessary to operate an approved E&T program. Allowable administrative expenses include:

- Salaries and benefits of personnel involved in administering E&T;
- Office equipment, supplies, postage, duplication costs and travel that is necessary to carry out the program's objectives;
- Development and production of E&T materials when no other appropriate materials exist;
- Lease or rental costs;
- Maintenance expenses;
- Other indirect costs; and
- Charges for travel for the purpose of fulfilling the approved plan based on official State, local or university travel regulations.

C. Participant Reimbursements

The county welfare department (CWD) is responsible for reimbursing participants for expenses that are reasonable, necessary, and directly related to participation in the E&T program. At a minimum, participants must be reimbursed for the cost of travel associated with E&T participation. Participant reimbursements must not be made with 100 percent federal grant or 50 percent matched administrative cost funding. Costs for which participants may be reimbursed include, but are not limited to the following:

- Transportation in the form of bus tickets, monthly bus passes, or gas vouchers;
- Dependent care;
- Work clothing and uniforms;
- Books and school supplies;
- Tuition for classes that are part of an E&T education component (subject to CDSS approval);
- Tools and other necessary equipment;
- Minor vision correction (such as eyeglasses, bifocals, eye exam);
- Basic dental work (such as teeth cleaning);
- Minor automobile repairs;
- Legal services;

- Test fees;
- Union dues;
- Licensing and bonding fees;
- Housing stabilization services limited to no more than two months per participant during the FFY subject to CDSS approval.

Participant expenses for transportation and costs other than dependent care are reimbursed by the CWD with 50 percent federal cost sharing up to the actual cost of the participant expenses or the CWD maximum reimbursement rate, whichever is lowest. It is essential that counties ensure participants are sufficiently reimbursed for transportation to travel both to and from their E&T assignment. County budgets and procedures must be regularly updated to reflect current costs of bus tickets, bus passes, and gasoline prices when participants are reimbursed with gas vouchers.

Monthly expenditures for dependent care are reimbursed by the CWD, with 50 percent federal cost sharing, up to the actual cost of the dependent care for each dependent or the regional market ceiling for child care, whichever is lowest. Counties may find the regional market ceiling for their county at: <http://www3.cde.ca.gov/rcscc/>. The provision of dependent care may be limited to specific components designed to serve families verses those components which focus primarily on single adults. Participants receiving dependent care should be reimbursed for all dependents requiring care unless otherwise prohibited by this section.

A county may not provide a reimbursement for a dependent age 13 or older unless the dependent is physically and/or mentally incapable of caring for himself or herself or is under court supervision. For dependents age 13 or older, the county should obtain written verification if a claim of physical and/or mental incapacity or a court-imposed requirement for supervision of a dependent is questionable. A county may provide reimbursements above established dependent care limits, but such costs must be paid for with 100 percent county funds. Participants with monthly expenses that exceed the amounts and limits above may have good cause for not participating.

D. E&T Funding Limitations

The use of E&T administrative funds is limited to the cost of planning, implementing, and operating an E&T program in accordance with an approved plan. E&T administrative funds must not be used for any of the following activities or purchases:

- Determining whether an individual must be work registered;
- Screening during the certification process;
- Disqualification activity that takes place after noncompliance without good cause is reported;
- Subsidizing a participant's wages;
- Reimbursing participants for dependent care or transportation/ancillary costs (these E&T costs should be budgeted and claimed to the specific county expense claim code provided for these expenses);

- Goods and services for private use;
- Outstanding debts;
- Entertainment costs that are primarily for amusement or social activities; and
- Fines, legal fees, and penalties for failure to comply with federal, state, or local laws.

E. Reasonable and Necessary Costs

Costs that may be reimbursed with E&T dollars must be reasonable and necessary. The federal E&T toolkit defines a cost as reasonable if, in its nature and amount, it does not exceed that which a prudent person would pay under the circumstances prevailing at the time the decision was made to incur the cost. A reasonable cost provides a program benefit generally commensurate with the cost incurred, is proportionate to related program costs, and is within the scope of E&T.

Necessary costs are those priority expenditures incurred to carry out essential functions of E&T that cannot be avoided without adversely affecting program operation and that do not duplicate existing efforts.

F. Funding Requirements for E&T Education Components

Counties that choose to offer an E&T education component must ensure that the following requirements for the use of E&T funds will be met:

- Federal funds made available to operate an education component must not be used to supplant non-federal funds being used for existing services and activities. This prohibition applies to both federal 100 percent allocations and federal matching dollars. Federal funds may only be used to operate an approved education component to the extent that E&T component costs exceed the normal cost of services provided to students not participating in E&T.
- Costs not charged to the general public cannot be charged to the E&T program. Nor can these costs be used to draw down a federal 50 percent reimbursement for administration of an E&T education component.
- Federal funds can be used to pay for some education activities and support services offered through community colleges as long as these services are above and beyond those offered to non-E&T students or offered at cost. These activities and services must be described in the county's E&T plan and are subject to review and approval by FNS. Tuition, case management, and other support services are allowable costs and can be paid for with federal and county dollars.
- All other sources of funding for education must be explored, including other educational grants such as the Pell grant but excluding student loans, before E&T funds are used for tuition. The cost of tuition must be the same for E&T participants as it is for students not participating in E&T.

G. E&T Partnerships

A county can establish a partnership with local agencies to provide E&T services, or to administer E&T components. In some instances, a county will reimburse a partner agency for all allowable administrative costs using 100 percent federal grant funds and in other cases, the partner agency will be reimbursed for half of its administrative expenditures using 50 percent federal cost sharing. In either case, the partner agency is able to access funds not previously at its disposal and the county is able to conserve limited resources while expanding available services to E&T participants. These arrangements are often called third-party reimbursement models.

Partnerships can vary in the scope of responsibility assumed by the partner agency(s). In a more restricted model, a partner agency would deliver the services of an E&T component, such as job club or vocational training and the county would retain responsibility for assessment, placement and tracking participation. In a more comprehensive model, the partner agency would assume responsibility for assessment, placement and tracking, as well as offering E&T activities and distributing participant reimbursements. The county would then reimburse the partner for allowable E&T expenses.

When creating a partnership, a county should first decide how much responsibility it wants to confer to a partner agency, including the services the agency will provide. Next, a county should select an appropriate partner agency or agencies to administer some or all of its E&T activities. Potential E&T partner agencies include Community-Based Organizations (CBOs), non-profit agencies, community colleges, vocational training centers, high school equivalency (GED) preparation centers, and local businesses. For a more comprehensive partnership, potential agencies should be assessed for their capacity to conduct assessments, track and report E&T participation, offer agreed upon E&T activities, submit accurate and timely invoices, and maintain financial records for review by CDSS upon request.

More detailed guidance for counties considering the use of partnerships in administering E&T is included in the federal E&T toolkit. Washington State maintains an effective E&T program through the use of partnerships and the toolkit summarizes a case study of Washington's third party design. This summary identifies five crucial questions a county should ask in assessing whether to partner with a given agency. It also contains a sample list of items to be addressed in a partnership agreement.

PART III. E&T COMPONENTS

An E&T program shall include one of the components listed below. Counties have the freedom to offer a single component, a sequence of components, or concurrent activities. Specific components can be established for various E&T target populations. For example, a county might establish job club and workfare components for homeless individuals with little work history and develop vocational training and education components for recipients who have more work experience.

A county can offer components in which work registrants participate on a voluntary basis, or it can mandate participation of those work registrants who do not qualify for an E&T deferral. E&T deferrals, including those added by SB 43 and SB 134, are listed in Part VI. Within a single county, some components might be voluntary and others mandatory e.g., a county might mandate participation in job club or job search and offer work experience for volunteers who want to improve their employability by obtaining training in the work place.

Assessment – A county must assess a client’s skill level, aptitude, interests and supportive service needs in order to determine what, if any, will be the most effective E&T component for that client. Assessment is not in itself an E&T component, but it is the first activity which should be performed in preparing an individual for E&T participation.

The design and extent of the assessment process will vary from county to county. Counties should clearly describe their assessment process in their E&T plan. Even though it is not a component, assessment is an allowable E&T expense. The cost of conducting an assessment should be included in the administrative budgets for the various components of the county’s E&T program.

An assessment can be conducted in a variety of ways. Counties could require individuals to complete a one or two page questionnaire regarding their work experience, educational achievements, goals, interests, and any barriers to employment. Or, a county may assign the client to a case worker who can assess the client in person. A county could also partner with other related programs such as Workforce Innovation and Opportunity Act (WIOA) One-Stop Career Centers, or non-government agencies which can provide a more comprehensive assessment. Many local workforce investment boards have extensive resources that can assist counties in the assessment process.

The following is a list of skills/knowledge that could be examined during the assessment:

- Education, including literacy level;
- Communication skills, including English proficiency;
- Employment history, skills, abilities and interest; and
- Barriers to employment and steps necessary to overcome these barriers.

The Department of Labor offers online career resources and workforce information to job seekers, students, businesses, and workforce professionals. Counties may wish to refer participants to <http://www.careeronestop.org/> as part of the assessment process.

Job Search – In this component, participants make a pre-determined number of inquiries about employment opportunities to prospective employers over a specified period of time. The component may be designed so that the participant conducts his/her job search independently or within a group setting. Methods for monitoring

participation in job search include written reports submitted by participants as well as random phone calls from county staff to employers listed on the participant's job search worksheet. Some counties offer job search as a stand-alone activity while others combine it with other E&T components such as job club and workfare. Job search components should entail at least 12 contacts with employers per month for two months.

Job Club – This component enhances the participants' job readiness by providing instruction in job seeking techniques and life skills along with exposure to available resources for locating employment. Participants receive training and assistance in preparing resumes, writing cover letters, filling out applications, conducting both face-to-face and telephone interviews, and in understanding employer expectations. Typically, job club is a classroom activity consisting of various workshops designed to help participants acquire and retain employment. Mock interviews are sometimes performed to increase participants' self-confidence. Job club may include an assessment of each participant's employment history, educational level, goals, and job skills. Job club components frequently include job search activities.

Vocational Training – This component is designed to improve the employability of E&T participants by providing training in a skill or trade that allows the participants to move directly into employment. Examples of providers of vocational training activities include CBOs, adult schools, community colleges, Private Industry Council programs, and Regional Occupational Programs.

Education – This component provides educational programs or activities to improve basic skills or otherwise improve employability. Such programs include Adult Basic Education (ABE, basic literacy, English as a Second Language (ESL), GED, and post-secondary education. A post-secondary education component is one whose purpose is academic and whose curriculum is designed primarily for students who are beyond the compulsory age for high school. Only those education components that establish a direct link to job readiness will be approved.

Work Experience – In this component, participants are placed in a non-salaried assignment where they acquire actual work experience and/or training. The goal of this experience is to enable participants to move into regular employment. In contrast to the workfare component, work experience placements can be with private, for-profit agencies. Work experience placements can also include unpaid internships that are a part of non-graduate school curriculum.

Work experience assignments cannot replace or prevent the employment of regular employees. Such assignments must provide the same benefits and working conditions provided to paid employees performing comparable work for comparable hours.

Workfare – In this component, participants perform non-salaried community service in a public service capacity. Workfare positions are established with public and private non-profit organizations such as government offices, libraries, and college campuses.

Participants perform such tasks as office work, roadside cleanup, and grounds maintenance.

The primary goal of workfare is to improve employability and encourage individuals to move into regular employment while returning something of value to the community. As part of the workfare component, a county may establish a job search period of up to 30 days prior to sending the registrant to a workfare site. Workfare assignments cannot replace or prevent the employment of regular employees. Such assignments must provide the same benefits and working conditions provided to paid employees performing comparable work for comparable hours.

Self-Initiated Workfare – This component is comparable to regular workfare except that participants locate their own workfare placements with public or private non-profit organizations. This is a voluntary component and CalFresh sanctions are not imposed for failure to participate. Some counties provide participants with a list of CBOs from which to locate their assignments. Participants are responsible for arranging to have their participation verified and reported to their case workers.

Job Retention – counties are authorized to provide job retention services for up to 90 days to those individuals who secure employment, provided they have received other employment/training services as part of E&T. Job retention services may include counseling, coaching, life skill classes, and participant reimbursements such as transportation, child care, equipment, tools and clothing required for the job, test fees, union dues, relocation expenses, and licensing and bonding fees.

Counties that opt to provide job retention services must include in their E&T plan a description of the retention services they plan to provide, the length of time they plan to provide them, to whom they plan to provide them, and the cost for providing these services. Counties should complete a component summary for job retention in Part III of their E&T plan and include job retention costs in their operating budget.

Counties may use their 100 percent federal allocation as well as 50 percent federal/50 percent county dollars for administration of tasks associated with the provision of job retention services. Allowable participant reimbursements for job retention must be funded with federal and county matching dollars. Federal funds may only be used to provide job retention services if such services are approved by CDSS.

Anti-Substance Abuse and Mental Health Improvement Services – The E&T toolkit specifies that generalized anti-drug, anti-alcohol, and mental health improvement discussions are permissible as part of an approved E&T program. This includes general discussions and the distribution of brochures and other materials. However, an E&T component should not be the forum for support groups, referrals, and treatment planning and implementation.

Hours devoted to anti-substance abuse and mental health improvement discussions should not exceed those dedicated to other aspects of the component that do not deal

directly with its main thrust. For example, if a job club component addresses such topics as effective job search, resume writing, interviewing, dress and hygiene, anti-substance abuse or mental health improvement discussion should take up no more time – and probably significantly less – than the other activities. In a job search component requiring 20 hours of participation per week, anti-substance abuse discussion and the dissemination of information must be less than ten hours.

In order to qualify for E&T program reimbursement, general anti-substance abuse and mental health improvement services must:

- Be reasonably necessary and directly related to E&T program component participation;
- Not be considered “medical” (i.e., a course of treatment provided by licensed physicians or psychologists); and
- Not be available through another government program or available at no cost to the participant through a private source such as a charitable organization.

Anti-substance abuse treatment, defined as behavior modification therapy for those who use drugs or alcohol to the detriment of themselves and others is not a reimbursable E&T activity. CalFresh applicants and recipients regularly undergoing such treatment are exempt from work registration requirements per Manual of Policies and Procedures (MPP) Section 63-407.21(f). Persons in need of mental health services would either be exempt from work registration requirements as mentally unfit for employment per MPP Section 63-407.21(b), or deferred based on temporary illness per MPP Section 63-407.811 (c)(8). Therefore, anti-substance abuse or mental health treatment are not necessary participant costs and may not be funded with E&T dollars.

Federal legislation and regulations contain the following minimum and maximum participation requirements for participation in E&T program components. Hours of participation in job search, job club, education, or vocational training can range from 12 to 120 per month. CDSS may approve a component requiring less than 12 hours per month if it advances the purpose of the E&T program namely, to improve employability and increase self-sufficiency.

Hours of participation in a workfare or work experience component are limited to the number obtained by dividing the household’s monthly CalFresh allotment by the higher of the applicable federal or state minimum wage. The minimum wage in California is currently \$10.00 per hour and the federal minimum wage is \$7.25. Persons who voluntarily participate in E&T may choose to participate for additional hours beyond the minimum wage calculation. For self-initiated workfare, counties may use a range of CalFresh allotments and corresponding fixed participation hours in lieu of requiring each participant to work the number of hours equal to the monthly household allotment divided by the higher of the applicable Federal or State minimum wage.

The maximum number of hours that can be required of a mandatory E&T participant is 30 per week or 120 per month. The county cannot mandate more than 120 hours per

month, but individuals can choose to participate for an unlimited amount of additional hours.

PART IV MANDATORY PARTICIPANTS, VOLUNTEERS, AND COUNTY TARGET POPULATIONS

A. Deferrals and Mandatory Participants

Within the work registrant population, certain persons are temporarily excused or “deferred” from participation for reasons that include those listed at MPP Section 63-407.811 and those adopted by SB 43 and SB 134. Deferrals are listed in Part VI. Counties can create additional deferrals beyond those in E&T regulations such as a deferral based on homelessness. Work registrants who are not deferred are defined as mandatory E&T participants. However, a county is not required to serve all mandatory participants.

B. Target Populations

Counties have the freedom to target specific groups within their pool of mandatory participants and to limit the provision of E&T services to these persons. Counties can also decide how many persons they will serve within their target populations. For example, a county could limit the number of persons it will serve based on existing resources and financial capacity. Mandatory participants not part of the target population are not obligated to participate in E&T. Persons targeted to receive E&T services must only participate if assigned by the county.

Examples of E&T target populations include, but are not limited to, CalFresh work registrants who are also recipients of General Assistance (GA), students attending community college, persons living in a particular geographic area within the county, individuals in need of adult basic education or training in ESL classes, or employable Able-Bodied Adults without Dependents (ABAWDs). Currently, the most frequently targeted population consists of those receiving both CalFresh and GA who are required to participate in GA employment and training activities. Targeting GA recipients as E&T participants provides a vehicle by which counties can use E&T dollars to pay for the costs of running their GA work components since these components also serve as their E&T components.

A county can have more than one target population and establish specific components for specific target groups. For example, one county might assign its GA population to CalFresh/GA job search and job club components and establish a work experience pilot project for CalFresh recipients living in a designated urban neighborhood. Another county might target work registrants with limited English proficiency, irrespective of their receipt of GA, and assign such persons to basic education and ESL. Still another county might place a small number of employable work registrants in an intense multi-faceted training program delivered by a variety of organizations and assign less employable GA recipients between age 18 and 50 to job club and workfare.

C. Volunteers

Counties may choose to operate E&T components in which work registrants elect to participate on a voluntary basis. All or part of a county's E&T program may be designed to serve voluntary work registrants. Persons who volunteer to participate in an E&T component must not be sanctioned for failure to comply with the requirements of that component. However, if a voluntary participant repeatedly fails to comply with an E&T component, the county should discontinue participant reimbursements and is not obligated to serve the individual. In a voluntary program, counties may still impose GA sanctions on CalFresh recipients whose GA work program also serves as their E&T program.

States and counties increasingly offer E&T programs as voluntary programs. These programs are devoted to persons who sincerely desire to participate in E&T based on their willingness to volunteer. Establishing a voluntary program saves counties time and effort associated with implementing and administering sanction policies for E&T participants based on complex state/federal policies. Counties do not need to devote E&T dollars and administrative hours toward activities associated with imposing CalFresh sanctions e.g., conducting good cause determinations and issuing notices of action. Less information is required in the E&T plan for counties with voluntary programs e.g., temporary deferral policies and procedures are unnecessary as only persons who wish to volunteer are served.

PART V WORK REGISTRATION AND ABAWD POPULATIONS

A. Preparing Accurate Estimates

As part of their E&T plan, counties must include estimates of the number of work registrants and ABAWDs expected to be in the county during the relevant fiscal year. In developing their estimates of work registrants and ABAWDs, it is essential that counties have an accurate understanding of those CalFresh recipients who should be included in these populations.

Counties should remember the following in preparing their plan estimates:

- The work registrant population is the largest population captured in the plan.
- The ABAWD population is a subset of the work registrant population. ABAWDs and work registrants are not distinct unrelated groups, but the ABAWD population is a smaller population within the work registrant population.
- There are always fewer ABAWDs in the county than there are work registrants because additional exemptions have been established for the ABAWD work requirement, which are not included in the list of work registration exemptions.

Once a county has estimated the size of its work registration population, it should use this population as its base for determining estimates for the number of ABAWDs in the county. The county should estimate the number of work registrants who qualify for the ABAWD exemptions based on age, pregnancy, unfitness, and living in a CalFresh household with a child under age 18. These persons would be deducted from the work registrant count and the remaining work registrants would represent the county's ABAWD population.

Persons who do not qualify for an ABAWD exemption are counted as ABAWDs even if they reside in a county with an ABAWD waiver, or are granted the 15 percent ABAWD exemption. Such persons are not considered exempt from the ABAWD work requirement. California has been granted a statewide ABAWD waiver for several years. The current waiver is scheduled to end December 31, 2017. CDSS will be seeking approval to waive the ABAWD work requirement in all counties that meet federally established waiver criteria. It is unlikely that California will receive an ABAWD waiver for the entire state in 2018. A detailed summary of the ABAWD time limit may be found in ACL 16-24.

B. Relationship of the E&T Plan to the STAT 47 Report

The quarterly STAT 47 data report is used to gather federally required work registrant and E&T participation data that is transmitted to the FNS using the FNS 583 E&T Program Activity Report. Effective January 6, 2015, the Stat 47 and Stat 48 forms have been significantly revised and consolidated into a single report (See ACL 14-91). The new report is entitled "Non-Assistance CalFresh Work Registrants, Able-Bodied Adults Without Dependents (ABAWD), and Employment and Training (E&T) Program Quarterly Statistical Report STAT 47 (10/14)."

The FNS uses the number of work registrants identified on the Stat 47 report as the primary source for determining the annual amount of E&T funds allotted to each state. Thus, it is essential that counties regularly review the STAT 47 report to ensure that work registrant numbers appear reasonable when compared with the size and demographics of the non-assistance CalFresh population. Inappropriately small work registrant counts will lead to a reduction in the size of California's 100 percent E&T federal grant. The data from the Stat 47 also provides counties with a starting point in developing work registrant and ABAWD estimates for inclusion in their E&T plan.

PART VI Glossary

The following definitions are included to assist counties in acquiring an accurate understanding of both E&T participation rules and the terms frequently used when discussing E&T policies and plan requirements.

ABAWD – An ABAWD is a non-assistance CalFresh recipient age 18 to 49 who is able bodied and who does not have dependent children. CalFresh eligibility for ABAWDs is limited to any three months in a 36-month period (a three month time limit) unless the

individual meets the ABAWD work requirement, qualifies for an exemption, lives in a county with an ABAWD waiver, or is granted the 15 percent ABAWD exemption described below. Counties are directed to ACL 16-24 for a detailed summary of the ABAWD time limit.

ABAWD Exemptions – Persons are exempt from the ABAWD work requirement if they qualify for one of the CalFresh work registration exemptions at MPP Section 63-407.21 (see list of work registration exemptions below). Individuals are also exempt from the work requirement if they are:

- Under age 18 or over age 49;
- Residing in a CalFresh household that includes a child under 18 years of age;
- Unfit for employment; or
- Pregnant.

ABAWD 15 percent Exemption – The 15 percent exemption is a temporary exemption that counties may grant to persons who are unable to satisfy the ABAWD work requirement due to circumstances beyond their control. California Department of Social Services allocates 15 percent exemption months to counties that do not qualify for an ABAWD waiver.

Criteria for the 15 percent exemption are developed by counties and include such things as illiteracy, family crisis that interrupts E&T participation or causes a temporary reduction in hours worked, social and emotional barriers, remoteness, temporary homelessness, lack of adequate transportation, domestic violence, recent release from a drug or alcohol treatment program, working 10 to 19 hours per week and unable to meet the 20-hour work requirement, and other reasons determined on a case-by-case basis. Unlike those granted one of the ABAWD exemptions listed above, persons granted the 15 percent exemption are still considered ABAWDs and are counted as such for purposes of quarterly reports and estimated ABAWD counts in the E&T plan.

ABAWD Waiver – The FNS may approve a waiver of the ABAWD work requirement for areas within a state that meet federally-established waiver criteria. Waiver approval criteria include designation as a Labor Surplus Area (LSA) by the U.S. Department of Labor (DOL), having a recent unemployment rate above ten percent, or having a 24 month average unemployment rate that is 20 percent above the national average for the same period.

ABAWD Work Requirement – The ABAWD work requirement is satisfied by performing one of the following activities:

- Working at least 20 hours per week (or 80 hours per month) in paid or volunteer employment;
- Participating at least 20 hours per week (or 80 hours per month) in an allowable work activity such as vocational training or education programs;

- Combining hours worked with time spent in training or education for a total of 20 hours per week (or 80 hours per month); or
- Participating in workfare or work experience activities. For E&T workfare and work experience, the ABAWD work requirement is met for each month an individual participates for the number of hours equal to the CalFresh allotment divided by the higher of the state or federal minimum wage.

For purposes of the ABAWD work requirement, a work activity means one of the following:

- A program under the Workforce Investment Act.
- A program under Section 236 of the Trade Act of 1974. The Trade Act applies to workers identified by the Employment Development Department (EDD) as adversely affected by the U.S. trade agreements, e.g., the North American Free Trade Act. The Trade Act provides training services to adversely affected workers through participation in programs that are subject to approval by the Secretary of the U.S. Department of Labor. These programs include job search, job club, on-the-job training, WIA training, or a program of remedial education.
- An employment and training program, including the CalFresh E&T Program. E&T stand-alone job club and job search components do not satisfy the ABAWD work requirement.

Assessment - A basic evaluation of an individual's needs and barriers prior to placement in an activity. A strong comprehensive assessment collects general information about demographics, educational attainment, basic skills, literacy, work experience and public benefits. It also assesses objective and subjective barriers to work, such as disabilities, criminal background, family composition, housing circumstances, child care needs and transportation needs. This in-depth evaluation of employability skills may often be coupled with counseling on how and where to search for employment. If combined with work experience, some form of employment search or training, a strong comprehensive assessment of this nature could constitute part of an approvable employment and training component.

CalFresh Employment and Training Program – A county-administered program designed to assist CalFresh recipients in increasing their employability and self-sufficiency through participation in program components and the provision of participant reimbursements.

Career Pathway - Well-connected and transparent education, training, credential and supportive services offerings within specific occupations that have multiple entry points and multiple exit points at successively higher levels of employment.

Commencing a Component - When an E&T participant formally begins participation in a component by performing the first act required by the component, e.g., attending the first Job Club session or making the first job contact.

Component – A service, activity, or program which is designed to help CalFresh recipients gain skill, training, or work experience that will increase their ability to obtain regular employment and achieve self-sufficiency. See Part III for a description of E&T components.

Contractor – Any public or private entity that is providing E&T services under a financial or non-financial agreement with the county agency.

Deferred – this term refers to a work-registered person or persons temporarily excused by the county from mandatory participation in the E&T program. A list of deferrals is contained in MPP Section 63-407.811 and includes lack of transportation, lack of dependent care, living an unreasonable distance from the E&T component site, family crisis, and temporary illness which includes pregnancy. Counties can also establish their own deferrals.

SB 43 and SB 134 added new deferral criteria to which all E&T counties must adhere, irrespective of their existing deferral policies. These deferrals are defined in Welfare and Institutions Code (WIC) Section 18926.5 and ACLs 12-03 and 13-107. WIC Section 18926.5 requires deferral of those work registrants who are:

- Under 18 years of age or 50 years of age or over;
- Living in a CalFresh household with a child under the age of 18, regardless of whether or not the child is receiving, or is eligible to receive, CalFresh benefits;
- Living in a federally determined work surplus area; or
- A veteran who has been honorably discharged from the United States Armed Forces.

Mandatory Participant – A CalFresh applicant or recipient who is neither exempt from CalFresh work registration, nor deferred from participation in E&T and who is required to participate in E&T as a condition of CalFresh eligibility. Typically, a county does not assign all persons who would otherwise be mandatory participants to an E&T activity. This is due to the fact that some participants are not targeted by the county to receive E&T services, or because available E&T funds are insufficient to serve all participants.

Non-ABAWD – A work registrant that qualifies for one of the exemptions specific to ABAWDs e.g., under 18 or over age 49, pregnant, physically unfit, or residing in a CalFresh household with a child under the age of 18.

Qualifying ABAWD Activity – An activity that satisfies the ABAWD work requirement. Qualifying activities consist of workfare (including the 30-day job search activity that can be assigned prior to workfare, self-initiated workfare, work experience, vocational training, and education. Stand-alone E&T job search or job club components are not qualifying activities for ABAWDs. However, hours spent in job search or job club may be combined with vocational training or education activities to meet the 20-hour weekly ABAWD requirement provided time spent in job search or job club comprises less than half of the total hours spent in the components.

Screening – An evaluation by the county as to whether a CalFresh applicant or recipient should be deferred from E&T or assessed for E&T participation. E&T funds may not be used to pay for the cost of screening.

Volunteer – A CalFresh recipient who voluntarily participates in E&T. Volunteers can include both CalFresh work registrants and persons exempt from CalFresh work registration. Volunteers are not subject to sanctions for failure to comply with E&T requirements.

Workforce Development System – An interconnected strategy for providing comprehensive labor market and occupational information to job seekers, employers, providers of one-stop services, and providers of workforce education and training activities. To the maximum extent possible, counties should utilize their workforce development system to serve E&T participants.

Work Registrant – A non-assistance CalFresh applicant or recipient who does not meet one of the work registration exemptions at MPP Section 63-407.21. Work registrants are subject to CalFresh work registration requirements at MPP Section 63-407.4. Work registrant requirements and exemptions are listed below.

Work Registration Exemptions – In accordance with MPP Section 63-407.21, an individual is exempt from work registration if he/she is:

- Younger than 16 years of age or 60 years of age or older;
- 16 or 17 years of age who is not the head of the household, or who is attending school or enrolled in an employment training program at least half time;
- Physically or mentally unfit for employment;
- Complying with CalWORKs Welfare-To-Work requirements;
- Caring for a dependent child under age six or an incapacitated person;
- Receiving or has applied for unemployment insurance benefits;
- Participating in a drug or alcohol treatment program that prohibits employment of 30 hours or more per week;
- Employed or self-employed at least 30 hours per week or receiving weekly earnings at least equal to the federal minimum wage multiplied by 30 hours;
- Attending school on at least a half-time basis.

Work Registrant Requirements – As a condition of CalFresh eligibility, every Non-Assistance CalFresh applicant and recipient between the ages of 15 and 60 who does not qualify for a work registration exemption must comply with the following requirements:

- Register for work or be registered by the county (see policies released in ACIN I-01-13);
- Participate in the E&T program if assigned by the county;

- Provide sufficient information upon request to determine employment status or availability for work;
- Report to an employer when referred by the county or its designee;
- Accept a bona fide offer of suitable employment; and
- Not voluntarily quit a job of 30 or more hours a week or reduce work hours to fewer than 30 hours a week without good cause.