

# STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY **DEPARTMENT OF SOCIAL SERVICES**

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September 17, 2015

ALL COUNTY LETTER NO. 15-69

<u>REASON</u>	<u>FOR</u>	<u>THIS</u>	<b>TRANSMIT</b>	TAL

[ ] State Law Change

[ ] Federal Law or Regulation

Change

[ ] Court Order

[X] Clarification Requested by One or More Counties

[ ] Initiated by CDSS

TO: ALL COUNTY WELFARE DIRECTORS

ALL CALWORKS PROGRAM SPECIALISTS

ALL COUNTY WELFARE-TO-WORK COORDINATORS

ALL CONSORTIUM PROJECT MANAGERS ALL REFUGEE PROGRAM COORDINATORS

ALL CHILD CARE COORDINATORS
ALL TRIBAL TANF ADMINISTRATORS

SUBJECT: QUESTIONS AND ANSWERS REGARDING THE CALIFORNIA WORK

OPPORTUNITY AND RESPONSIBILITY TO KIDS (CalWORKs) WELFARE-TO-WORK (WTW) PROGRAM APPRAISAL AND THE

ONLINE CALWORKS APPRAISAL TOOL (OCAT)

REFERENCES: ALL COUNTY LETTER (ACL) <u>15-09</u>, <u>15-43</u>; MANUAL OF POLICIES

AND PROCEDURES (MPP) SECTION 42-711

The purpose of this letter is to provide guidance to counties regarding OCAT and the CalWORKs WTW appraisal process. Contained in this letter is an attachment which answers questions received by the California Department of Social Services (CDSS) Employment Bureau.

If you have any program policy questions regarding the information in this letter, please contact your CDSS CalWORKs Employment Bureau county consultant at (916) 654-2137.

Sincerely,

## Original Document Signed By:

TODD R. BLAND Deputy Director Welfare to Work Division

Attachment

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#### QUESTIONS AND ANSWERS REGARDING OCAT

**Question 1:** Can an individual be sanctioned for not answering questions in OCAT? If not, what sections are required?

**CDSS Response:** No, but an individual may be sanctioned if he or she refuses to participate in the appraisal. MPP Section 42-711.523 states that "During the appraisal, the individual shall provide relevant information the County Welfare Department (CWD) requires in order to assign welfare-to-work activities appropriately." Many sections of OCAT address sensitive topics, which a client may not be comfortable disclosing, and cannot be compelled to answer. A client shall be considered compliant with the appraisal process even if he or she does not wish to disclose answers to specific questions in the OCAT. The release of OCAT has not changed the requirement for a client to participate in appraisal in accordance with MPP Section 42-711.523.

Counties are reminded that the work and education history sections of OCAT collect a great deal of information for the benefit of the client. Though, if a client cannot remember details of a particular past job when discussing employment history, or specific information about an educational institution, it is recommended that the case worker should move on, rather than forcing the client to provide information he or she may not have.

**Question 2:** If an individual is required to go through a new appraisal, but OCAT has auto-filled the prior interview's answers, must a new OCAT appraisal be conducted?

**CDSS Response:** No, but the case worker must review the prior interview data with the client in order to ensure that the information reflects the client's current circumstances. This includes, but is not limited to, ensuring that necessary supportive services are accounted for, that the individual receives necessary mental health or substance abuse services, and determining if the individual qualifies for a Self-Initiated Program.

If a client returns to aid after being off aid for six months or more, as described in MPP Section 42-711.513, a new OCAT questionnaire may be generated with the prior appraisal's answers pre-loaded. The new appraisal may consist of a review and update of prior answers to determine if any changes need to be made to the appraisal summary and recommendations report (ASR). This review of the questionnaire and update of the ASR meets the threshold for a 'new appraisal' in regards to clients who have had a break-in aid of more than six months. Please note that after 12 months, as the tool is currently configured, this 'pre-loading' functionality is no longer available and a completely new appraisal questionnaire would need to be completed with the client.

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#### **QUESTIONS AND ANSWERS REGARDING OCAT**

**Question 3:** Does OCAT identify exemptions?

**CDSS Response:** While a number of possible exemptions are identified in OCAT, the tool does not currently identify all possible WTW exemptions. In addition, the recommendations from the tool only assist in identifying whether an exemption condition may exist and directs the county to evaluate whether the granting of an exemption is appropriate. OCAT does not determine whether an exemption should be granted. If a possible exemption is identified in OCAT, the county must evaluate the client's situation to properly determine if he or she qualifies for the exemption.

For example, if a client states that he or she has health concerns that may present a challenge to WTW participation, OCAT will recommend that the county evaluate the client for a possible exemption based on a disability. In this example, the county would then follow its established procedures for determining an exemption including providing the client with the CW 2186A (*CalWORKs Exemption Request Form*).

**Question 4:** Is the WTW 18 (*Learning Needs Screening* form) required to perform a Learning Needs Screening if the individual has completed an OCAT appraisal?

**CDSS Response:** No, the WTW 18 is only necessary if the individual requests a screening after appraisal. The screening tool incorporated into OCAT is identical to the WTW 18, and does not need to be duplicated outside of OCAT. The WTW 17 (*Waiver of CalWORKs Learning Disabilities Screening and/or Evaluation*) is still required if a client chooses to waive his or her screening during the OCAT appraisal. The WTW 20 (*Permission to Release Learning Disabilities Information*) may still be required following the OCAT appraisal if information concerning learning needs or disabilities must be shared with an outside entity.

**Question 5:** Can an OCAT appraisal be conducted over the phone or during a home visit?

CDSS Response: OCAT is designed for in-person interviews, especially as its effectiveness is enhanced with the use of in-person interviewing techniques that build rapport between the case worker and the client. This approach ensures that comprehensive understanding and documentation of the client's strengths and barriers occurs and that necessary services are identified, along with other next steps, for client success in WTW activities. A county may conduct an appraisal at a client's home only if privacy and confidentiality is maintained during the visit. In addition, when an office appointment or home visit cannot be achieved due to it interfering with the client's work or class schedule, or as a reasonable accommodation for a disability, a county may conduct an OCAT interview by phone or other remote connection.

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### **QUESTIONS AND ANSWERS REGARDING OCAT**

To ensure a remote appraisal is conducted as smoothly as possible, the case worker must be able to verify the identity of the individual being interviewed, confirm that he or she has privacy during the conversation (and is not in the presence of others), and confirm that he or she is the only one being interviewed and is able to take appropriate precautions regarding confidentiality.