





EDMUND G. BROWN JR. GOVERNOR

REASON FOR THIS TRANSMITTAL

[] State Law Change

Change

[] Court Order

[] Federal Law or Regulation

[X] Clarification Requested by One or More Counties

September 15, 2016

ALL COUNTY LETTER NO. 16-67

- TO:
- ALL COUNTY WELFARE DIRECTORS
  [] Initiated by CDSS
  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: SECOND SET OF 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>, <u>15-69</u>, <u>15-101</u>; MANUAL OF POLICIES AND PROCEDURES (MPP) SECTION 42-711.5, 42-711.53, 42-711.55, 42-715.12, AND 42-715.14.

The purpose of this letter is to provide answers to questions received by the California Department of Social Services (CDSS) Employment Bureau regarding the CalWORKs WTW appraisal process and OCAT. Previous question and answer clarification on the OCAT can be found in ACL <u>15-69</u>. Questions on a variety of subjects including updates to the tool, training, accommodations and treatment of sensitive subjects, and the relationship between the OCAT appraisal and the WTW assessment are included in this letter.

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, or at <u>ocat@dss.ca.gov</u>.

Sincerely,

**Original Document Signed By:** 

TODD R. BLAND Deputy Director Welfare to Work Division

Attachment

### QUESTIONS AND ANSWERS REGARDING OCAT

#### WTW Flow

**Question 1:** Is an assessment still required following an OCAT appraisal? Does the OCAT fulfill assessment requirements?

**CDSS Response:** Yes, an assessment, as described in MPP Section 42-711.55, is required for all WTW clients prior to signing a WTW plan.

No, the OCAT does not fulfill the requirement to perform an assessment. While the OCAT appraisal does cover many topics, it does not do so with the depth appropriate to a true assessment. Assessment is an opportunity to perform any in-depth evaluations (e.g. mental health or substance abuse evaluations), as well as examining the local job market relative to a client's skills and interests.

**Question 2:** Can the OCAT be used with individuals who may not normally be subject to a WTW appraisal (e.g. individuals identified for exemption during the CalWORKs eligibility process, Cal-Learn teens)?

**CDSS Response:** The OCAT was designed for use specifically with incoming CalWORKs WTW clients, and may be inappropriate for individuals who are not required to participate in the WTW program. An individual who is not required to attend appraisal cannot be required to complete an OCAT appraisal. For example, a Cal-Learn client is subject to different requirements than a WTW participant, and many of the questions and recommendations in the OCAT may be inappropriate for the Cal-Learn client. In addition, OCAT data reports are used to analyze client needs at the individual county and state levels, and the addition of clients who are not participating in the WTW program may impact reports generated by the OCAT by altering the client base.

Exempt clients who choose to voluntarily participate in WTW activities are encouraged to attend a WTW appraisal in order to determine barriers or needs which they may have. Individuals who are exempt but choose not to volunteer would not be required to attend a WTW appraisal until after their exemption end date.

**Question 3:** Does an individual need to complete an OCAT appraisal if he or she is employed full time?

**CDSS Response:** Yes. All new CalWORKs recipients who are required to participate in WTW are subject to the WTW flow, as specified in MPP Section 42-711.5. The new WTW flow begins with an individual attending orientation, followed by an in-depth appraisal to assess his or her strengths and barriers to employment (OCAT). Even though a full time employed client would be presumed to meet participation

requirements, the OCAT is still considered useful by providing a screening for other potential barriers, such as mental health, substance abuse, learning needs, and domestic abuse issues. It is beneficial for County Welfare Departments (CWDs) to be aware of and offer services for any issues the client has which may impact his or her ability to maintain employment. CWDs are reminded that OCAT interviews may be completed by phone in order to accommodate a client's availability or needs, as described in ACL <u>15-69</u>, Question/Answer #5.

# **OCAT Protocols/Technical Information**

**Question 4:** Are signatures required on the Appraisal Summary and Recommendations report (ASR), generated by the OCAT?

**CDSS Response:** No. The signature block on any documents generated by the OCAT are for acknowledgement and documentation purposes only and are not required to be signed by the client. If the client does not wish to sign such documents, it is recommended that the county case worker document in the case file when the ASR was generated and reviewed with the client. A client is still considered compliant with the WTW program even if he or she refuses to sign an OCAT ASR.

Forms that are linked to the OCAT questionnaire or ASR, such as the *Waiver of CalWORKs Learning Disabilities Screening and/or Evaluation* (WTW 17), are not considered to be generated by the OCAT, and are treated according to instructions provided at their release.

**Question 5:** What is the update schedule for OCAT? Will users receive notifications prior to updates?

**CDSS Response:** Currently, there is not a regular update schedule for OCAT releases. The schedule for releases remains flexible in order to accommodate the level of programming effort and approval process each necessary update and enacted enhancement requires. Updating OCAT in this manner allows for ICF International, CDSS' OCAT vendor, to program necessary fixes and updates in a more timely and responsive manner.

CDSS utilizes the Change Control Board process in order to review and approve requested updates to the OCAT. Additional information regarding the OCAT Change Control Board process can be found in the <u>All County Welfare Directors Letter</u> on OCAT, dated May 27, 2014. In the spring of 2016, a Change Control Board session was held in order to review and approve any necessary and desired OCAT enhancements based on feedback received during statewide implementation.

To date, ICF International has released a number of new versions of OCAT including OCAT 1.3, 1.4, 1.41, 1.5, 1.5.1, and 1.6. Between now and October 2016, CWDs may anticipate the release of three additional new versions of OCAT – OCAT 1.7, 1.8, and 1.9.

All OCAT users will receive email notification prior to implementation of each new version of OCAT. Release notes will be included with each notification, outlining enhancements and other changes the release will include. Below is the current OCAT communication protocol detailing when users will receive email notices for OCAT updates, announcements, and Helpdesk Tips.

Type of Communication	Timing	Audience
		OCAT Site Users;
New version of OCAT	48 hours to one	OCAT County Coordinators;
Initial announcement & release notes	week prior to version release	OCAT Administrators; CDSS.
		Copies available in the Learning Center
<b>New version of OCAT</b> Version active on site	Day of version release	OCAT Site Users;
		OCAT County Coordinators;
		OCAT Administrators; CDSS.
		OCAT Site Users;
General Helpdesk Tips or Announcements	As needed	OCAT County Coordinators;
		OCAT Administrators; CDSS.
		Copies available in the Learning Center
Helpdesk Administrator Tips or Announcements	As needed	OCAT County Administrators or
		designated County Inboxes;
		OCAT County Coordinators; CDSS

Questions regarding this protocol or upcoming OCAT enhancements may be submitted to <u>OCAT@dss.ca.gov</u>.

**Question 6:** What contingencies are in place for an OCAT outage? What should CWDs do if access to the tool is unavailable?

**CDSS Response:** Copies of the OCAT questionnaire and rules documents will soon be available through the online OCAT Learning Center. CDSS recommends that CWDs save a local copy of these documents in case access to the tool is interrupted due to system outage or local information technology/connectivity issues.

If access to the tool is interrupted, the questionnaire may be administered to clients via paper form. Once access to OCAT is available, client responses to questions must be entered into OCAT to generate the ASR. The tool's questions must be administered as

part of an interview; a hardcopy or offline version of the OCAT questionnaire is not to be treated as a form for clients to fill out.

If connection to the tool is interrupted for an extended period of time, CWDs may assign the client to job search or another appropriate initial engagement activity as described in MPP Section 42-711.53, until OCAT is once again available for use. Any offline use of the OCAT or the direct assignment of a client to initial engagement activities may not take place when access to the online tool is available.

Question 7: Can a CWD contract with outside agencies to perform OCAT appraisals?

**CDSS Response:** Yes. OCAT can be administered by contracted service providers in the same manner as other WTW case management functions. CWDs must ensure that contracted OCAT service providers, as well as any partners with whom OCAT ASRs are shared, conform to current state and county policies. This includes, but is not limited to, ensuring client Personally Identifiable Information (PII) is protected from unauthorized disclosure.

**Question 8:** Are there plans to add the background section of the *Learning Needs Screening* (WTW 18) to the OCAT in order to align the learning needs section with the paper form?

**CDSS Response:** No. The background section of the WTW 18 was removed when the form was updated in ACL <u>15-101</u> in order to align with the version within the OCAT. The information from the obsolete version of the WTW 18 is available elsewhere in the OCAT. Asking the background questions again while administering the Learning Needs Screening within the OCAT would extend the interview and possibly lead to increased client frustration due to repeated questioning.

#### Two Parent Households and Domestic Abuse Concerns

**Question 9:** Both parents choose to complete an OCAT appraisal together rather than separately. How should this be handled by the CWD?

**CDSS Response:** The OCAT was designed to be performed with individual clients. CWDs are reminded to explain to each client that the information being gathered by OCAT is requested to better assist the individual in becoming self-sufficient while promoting his or her safety. As stated in ACL <u>15-43</u>, if more than one adult in an assistance unit is required to participate in WTW, the CWD shall conduct an individual private OCAT appraisal for each participating adult.

County case workers may have situations where both adults in a two parent assistance unit insist on completing the OCAT together rather than separately. This could be due to

a variety of reasons, including cultural beliefs and practices, or accommodations for a disability. When faced with these types of situations, CWDs may conduct OCAT appraisals for the two adults together.

While conducting these interviews, county case workers may determine that certain sections of the OCAT may be inappropriate to review with each participant while the partner is present. When this occurs, it is appropriate to skip those sections of the questionnaire. Additionally, due to safety concerns for the both the client and county case worker, it is not recommended that the domestic abuse section of the OCAT questionnaire be reviewed if a participant's partner is present. If the above mentioned scenario occurs, an indicator check box is available within the OCAT which allows for the county case worker to document that the domestic abuse section questions were not asked because the participant's partner was present at the time of the interview.

CWDs are reminded that per MPP Section 42-715.12, CalWORKs clients shall be provided with opportunities to confidentially self-identify or disclose domestic abuse. While OCAT provides an opportunity for clients to disclose abuse confidentially, in the scenario described above, the OCAT may not fulfill this regulatory requirement. For further assistance, CWDs are encouraged to work with their local domestic abuse service providers in order to develop best practices for handling these types of situations.

As an additional reminder, as discussed in ACL  $\underline{15-43}$ , a client may opt out of any portion of the OCAT appraisal, except for the collection of demographic information. ACL  $\underline{15-69}$ , Question/Answer #1 further clarifies the threshold for finding a client non-compliant with the appraisal process.

**Question 10:** If a client discloses they are a victim of domestic abuse during the OCAT interview, are CWDs required to ask the domestic abuse section questions to the alleged perpetrator of the abuse if he or she is also required to undergo an OCAT appraisal?

**CDSS Response:** No. County case workers are not required to ask the alleged perpetrator the OCAT domestic abuse section questions in this scenario. This is to avoid putting the victim at further risk of abuse. Additionally, per MPP Section 42-715.14, CWDs are reminded to advise clients that answering questions related to domestic abuse is completely optional and answers indicating abuse will not have a negative effect on the client's ability to participate in the WTW program.

In addition, it is recommended that CWDs create policies that promote safety planning and assist in reducing client exposure to further abuse, while respecting survivors' rights to make the best decisions for their lives. This may include reminding applicable clients of the presence of domestic abuse related recommendations within their ASR. It could also include working with the client to ensure these documents remain confidential and do not put the client at further risk of abuse. This could be done by working with clients on alternative means to store personal copies of the ASR (instead of the client taking the copy home) or, in agreement with the client, hand removing pages from the client's copy of the ASR which include domestic abuse related recommendations.

For further assistance, CWDs are encouraged to work with their local domestic abuse service providers in order to develop best practices for handling these types of situations. Additional resources, including state training materials, are available to CWDs on the <u>Domestic Abuse Resources for CWDs</u> page of the CDSS website.

#### Translations and Resources

Question 11: Will the OCAT be available in other languages?

**CDSS Response:** Yes. CDSS is currently assessing next steps for OCAT translations. CDSS plans to conduct a workgroup with various stakeholders in 2016 to help determine the best methods to address this area of concern. CDSS will be reaching out to CWDs, as well as other stakeholders, to solicit participation in this workgroup. For those stakeholders that have interest in participating on this workgroup, please submit your interest along with your contact information to <u>OCAT@dss.ca.gov</u>.

**Question 12:** What resources are available to assist county case workers in the rapport building necessary for OCAT?

**CDSS Response:** CWDs have been provided mandatory training along with resource materials geared towards assisting with staff skill development in rapport building and motivational interviewing techniques. The original mandatory training and additional training materials are available to all OCAT users through the OCAT Learning Center, which is accessible online through both the OCAT Training (https://ocattrain.workquotient.com/) and Production (https://ocat.workquotient.com/) sites.

The County Trainer Toolkit, available in the OCAT Learning Center, is a particularly helpful resource designed so that CWD trainers may easily customize OCAT training to their individual CWD's needs. In addition, various resources including the OCAT Administrator Guide, Helpdesk Tips, and Helpdesk Weekly Reports are also available through the OCAT Learning Center.

For assistance in accessing the OCAT Learning Center, please contact the OCAT Helpdesk at <u>OCAT@icfi.com</u>.