



CDSS

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ARNOLD SCHWARZENEGGER
GOVERNOR

September 30, 2009

ALL-COUNTY INFORMATION NOTICE NO. I-68-09

REASON FOR THIS TRANSMITTAL

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

TO: ALL COUNTY WELFARE DIRECTORS
ALL COUNTY FOOD STAMP COORDINATORS
ALL FOOD STAMP EMPLOYMENT AND TRAINING
COORDINATORS

SUBJECT: FEDERAL FISCAL YEAR 2010 PLAN TEMPLATE AND POLICY
GUIDELINES FOR COUNTIES PARTICIPATING IN THE FOOD
STAMP EMPLOYMENT AND TRAINING PROGRAM

REFERENCE: MANUAL OF POLICIES AND PROCEDURES, DIVISION 63,
SECTIONS 63-407

This letter transmits the Federal Fiscal Year (FFY) 2010 county plan template, Food Stamp Employment and Training (FSET) policy guidelines, and 100 percent fund allocation for the FSET program. In accordance with the provisions of federal and state law, counties who want to participate in FSET must submit a completed FSET plan for inclusion in California's statewide FSET plan (7 CFR 273.7 (c)(6) and CDSS Manual of Policies and Procedures (MPP) Section 63-407.842).

For FFY 2010, California has been granted a federal FSET allocation of \$7,531,122, which includes \$808,000 that will be used to cover state administrative costs and to provide workers' compensation coverage for FSET participants. Twenty-three counties have indicated their intent to operate an FSET program in FFY 2010. FSET funds have been allocated among these 23 counties based on their average monthly caseload. Please refer to the attached list, which shows the distribution of 100 percent of the federal FSET grant among the participating counties.

If the cost of a county's FSET program exceeds its 100 percent federal allocation, the county will receive a federal reimbursement for 50 percent of additional allowable expenditures. Participant expenses for transportation and ancillary costs are reimbursed by the county with 50 percent federal cost sharing. Counties are reminded that 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.

The FSET template for FFY 2010 has been revised for simplicity and clarity. Counties must complete all sections and tables within the template. If certain optional provisions of the FSET plan are not relevant to the county's FSET program, the county should indicate that these provisions are not applicable. The FFY 2010 template must be used for plan completion and all previous versions of the template should be disregarded.

The FSET policy guidelines cover a variety of subjects and are designed to help counties gain a fuller and more accurate understanding of FSET requirements. A clear understanding of FSET terminology, funding rules, and participation requirements is essential to preparing an FSET plan and effectively administering an FSET program. It is strongly recommended that county staff review the FSET policy guidelines, including the program definitions, prior to or concurrent with the completion of their FSET plans.

It is important that counties provide reasonably accurate estimates of their work registrant and Able-Bodied Adults Without Dependents (ABAWD) populations for FFY 2010. Counties should develop these estimates using data from their most recent statistical reports:

- The Annual Work Registrant and Food Stamp Employment and Training (FSET) Program Caseload Report (STAT 48);
- The Food Stamp Program Work Registrant, Able-Bodied Adult Without Dependents (ABAWD), and Food Stamp Employment and Training (FSET) Program Caseload Report (STAT 47).

Counties are reminded that the Food and Nutrition Service (FNS) utilizes the data from the STAT 47 and 48 forms to determine each state's future allocation of FSET funds and the 15 percent ABAWD exemptions. Therefore, it is important that counties report data on the STAT 47 and 48 reports in an accurate and timely fashion.

The template accompanying this ACIN is a PDF file and is strictly for informational purposes. Counties will receive a Microsoft Word version of the template for actual use in preparing their plans. The Microsoft Word version of the template will be e-mailed to counties immediately following issuance of this ACIN. Counties should inform CDSS within one week of the issuance of this ACIN if they did not receive a Microsoft Word copy of the plan template. Those counties that did not receive an e-mailed copy of the template should e-mail updated contact information to CDSS, including the name, title, address, fax and telephone number, and e-mail address of the individual who will be responsible for preparing the FSET plan, to Kristin Brinks, Manager of the FSET Unit, at kristin.brinks@dss.ca.gov.

The deadline for submitting your county's FSET Plan is November 5, 2009. Please forward an electronic copy in Microsoft Word and subsequently mail a signed hard copy to:

ATTN: Kristin Brinks, Manager
California Department of Social Services
Food Stamp Branch
744 P Street, M.S. 8-9-32
Sacramento, CA 95814

If you have questions regarding the STAT 47 or STAT 48 reports, please contact Sharon Shinpaugh of the Data Systems and Survey Design Bureau at (916) 928-7927. If you have any questions about this letter or the submission of your plan, please contact Robert Nevins, Food Stamps FSET Analyst, at (916) 654-1408, or Kristin Brinks, Manager, at (916) 654-1435.

Sincerely,

Original Document Signed By:

CHRISTINE WEBB-CURTIS, Chief
Food Stamp Branch

Enclosure

County	Average Monthly Caseload FFY 2008	% to Total	FSET 100 % Federal Grant Allocation
ALAMEDA	26,478	0.056153	377,523
HUMBOLDT	3,759	0.007972	53,597
KERN	26,964	0.057184	384,455
LOS ANGELES	215,045	0.456055	3,066,113
MARIN	2,174	0.004610	30,994
MENDOCINO	3,676	0.007796	52,413
MONTEREY	8,043	0.017057	114,676
ORANGE	25,943	0.055018	369,893
PLACER	2,766	0.005866	39,438
RIVERSIDE	26,639	0.056494	379,816
SACRAMENTO	33,906	0.071906	483,433
SAN DIEGO	27,367	0.058038	390,197
SAN FRANCISCO	16,340	0.034653	232,976
SAN JOAQUIN	9,492	0.020130	135,336
SAN LUIS OBISPO	3,112	0.006600	44,373
SAN MATEO	1,989	0.004218	28,358
SANTA BARBARA	4,498	0.009539	64,132
SANTA CLARA	18,281	0.038769	260,649
SANTA CRUZ	4,592	0.009738	65,470
SHASTA	4,373	0.009274	62,350
SONOMA	5,692	0.012071	81,155
TRINITY	405	0.000859	5,775
VENTURA	11,155	0.023657	159,049
TOTALS	471,534	100.0000%	\$6,723,122

Policy Guidelines for Counties Offering a Food Stamp Employment and Training Program

Introduction:

The purpose of this document is to provide policy definitions and clarifications for use by counties in the preparation of their Food Stamp Employment and Training (FSET) plans and the operation of their FSET programs. Counties are advised to read this document prior to preparation of their FSET plan. They are also advised to read the federal FSET funding questions and answers, which were transmitted to counties via All County Information Notice (ACIN) I-50-07, dated September 28, 2007.

A. FSET Plan Submission and Modifications

Counties offering FSET must submit a plan that describes their FSET program and identifies the estimated costs associated with administering the program and reimbursing participants for the costs of products and services necessary for program participation. In order to be approved, all county plans must be prepared using the template designed by the California Department of Social Services (CDSS) for the 2010 Federal Fiscal Year (FFY).

If a county proposes to make any substantive change to its FSET program after their FSET plan for FFY 2010 is approved, the county must submit a plan modification to CDSS. The modification request must be approved by CDSS 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 CDSS and FNS. The following are examples of changes that require a formal modification of the county FSET plan:

- Major change in components (e.g., adding, deleting, or modifying a component);
- Significant change in the amount of expenditures expected to exceed the county's 100 percent FSET grant level for which the county will request 50 percent federal reimbursement;
- Change in the method of paying participant reimbursement.

To submit a plan for modification, the original plan must be edited and submitted using either the track changes method or the strikethrough and underline method. A 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 proposed change. The county may want to contact CDSS for assistance in determining those sections within its FSET plan that will be affected by the proposed modification.

Some changes to the county FSET plan do not require approval by CDSS. These changes include the following:

- Substitution of one contractor for another that does not affect the scope or operation of a component; or
- A change in the targeted population of a component [e.g., from Able-Bodied Adults Without Dependents (ABAWDs) to recipients of General Assistance (GA)] that does not affect the participation levels or component cost.

Although CDSS approval is not required for these changes, counties should notify CDSS of the revisions being made using the same approach described above. FSET plan revisions should be reported to CDSS in a timely manner in order for CDSS to maintain accurate records to report to FNS as needed.

B. FSET Funding

1. Use of FSET Funds

Each state receives an annual 100 percent federal allocation to administer its FSET program. In California, this allocation is distributed among those counties that have chosen to participate in FSET based on their average monthly caseload. Counties who wish to spend additional dollars administering their FSET program can receive federal reimbursement for 50 percent of their administrative costs. FNS also reimburses 50 percent of allowable expenditures for participant reimbursement. Financial information is reported on a county expense claim and includes claims for the 100 percent federal grant, 50 percent matched administrative funding, and participant reimbursements. The claim is due 30 days after the end of each federal fiscal quarter. The county welfare department (CWD) is responsible for reimbursing participants for necessary and reasonable expenses incurred in fulfilling FSET requirements. Expenditures that may be included in this category are transportation, dependent care, books, training manuals, uniforms or other special equipment, and any other necessary, reasonable, and properly allocated cost that a participant incurs for participation in the FSET program. Participant reimbursements must not be made with 100 percent federal grant or 50 percent matched administrative cost funding.

Participant expenses for transportation and costs other than dependent care—per participant per month—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.

Expenditures for dependent care—per dependent per month—are reimbursed by the CWD, with 50 percent federal cost sharing, up to the actual cost of the dependent care or the Regional Market Rate, whichever is lowest. The CWD may provide reimbursements above established dependent care limits, but such costs must be paid for with the 100 percent federal allocation.

The latest regional market rates can be obtained at:
<http://www.cde.ca.gov/fg/aa/cd/ap/index.aspx>

Participants with monthly expenses that exceed the amounts and limits above may have good cause for not participating.

2. FSET Funding Limitations

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

- Determining whether an individual must be work registered;
- The work registration process;
- Screening during the certification process;
- Disqualification activity that takes place after noncompliance without good cause is reported;
- Subsidizing a participant's wages; and
- Reimbursing participants for dependent care or transportation/ancillary costs (these FSET costs should be budgeted and claimed to the specific county expense claim code provided for these expenses).

C. Work Registration and ABAWD Populations

As part of their FSET 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 food stamp recipients who should be included in these populations. The definitions section of this document explains just what is meant by work registrants and ABAWDs.

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, and living in a food stamp 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 exemption. Such persons are not considered exempt from the ABAWD work requirement.

D. Mandatory Participants, Volunteers, and County Target Populations

Within the work registrant population, certain persons are temporarily excused or "deferred" from participation for reasons listed at Manual of Policies and Procedures (MPP) Section 63-407.811. Work registrants who are not deferred are defined as mandatory FSET participants. However, a county is not required to serve all mandatory participants.

Counties have the freedom to target specific groups within the pool of mandatory participants and to limit the provision of FSET services to these persons. Counties can also decide how many persons they will serve within their target populations. Mandatory participants not part of the target population are not obligated to participate in FSET. Persons targeted to receive FSET services must only participate if assigned by the county.

The most common target population is food stamp work registrants who are also recipients of GA. Counties define participation in their GA employment and training program as participation in FSET. This provides a vehicle by which counties can use FSET dollars to pay for the costs of running their GA work components since these components are also FSET components. Other target populations include, but are not limited to, persons living in a particular geographic area within the county, persons in need of adult basic education or training in English as a Second Language (ESL) classes, or employable ABAWDs.

Counties may choose to operate FSET components in which work registrants elect to participate on a voluntary basis. Mandatory participants are not required to participate in these components, but do so strictly on a voluntary basis. Persons who volunteer to participate in an FSET component must not be sanctioned for failure to comply with the requirements of that component. All or part of a county's FSET program may be designed to serve voluntary work registrants.

E. Relationship of the FSET Plan to the Stat 47 and Stat 48 Reports and the County Expense Claim

The quarterly STAT 47 and annual STAT 48 data reports are compiled to provide FNS with the actual number of work registrants and ABAWDs for each quarter as well as the number of persons participating in FSET components, and the number of ABAWDs receiving the 15 percent exemption or living in a county with an ABAWD waiver. The

data from these reports also provides a starting point for counties to use in developing estimates for the next year's FSET plan.

Unless the county anticipates significant changes in the size and characteristics of its food stamp population or the number of persons to be served in FSET, estimates for the number of work registrants and ABAWDs identified in the FSET plan should not differ significantly from those reported on the Stat 47 and 48 forms. However, counties are reminded that the estimates of work registrants and ABAWDs contained in the FSET plan should be based on unduplicated counts. Currently, the ABAWD count on the Stat 47 is a duplicated count, but CDSS plans to revise the form so that the numbers for work registrants and ABAWDs are both unduplicated. Counties will be informed when these revisions have been completed. Until then, the current Stat 47 report must be used.

The STAT 47 report is due 15 business days after each fiscal quarter ends, and the STAT 48 report is due on November 15th of each year. Data from these reports is used by CDSS to provide data to FNS on the number of work registrants and FSET program participation by non-ABAWDs and ABAWDs as well as utilization of the 15 percent ABAWD exemption. FNS in turn utilizes work registrant and ABAWD data to determine the annual amount of FSET funds and 15 percent ABAWD exemptions that will be allocated to each state. Thus, counties should periodically review their data reports to ensure accuracy in completing the Stat 47 and 48 reports.

F. Program Definitions

ABAWD – An ABAWD is a non-assistance food stamp recipient between the ages of 18 and 49 who does not qualify for one of the ABAWD exemptions listed in MPP Section 63-410.3 (see list below). Food stamp 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 (see definition below).

ABAWD Exemptions - Persons are exempt from the ABAWD work requirement if they are exempt from food stamp work registration (see list of work registration exemptions below);

- Under 18 or over 50 years of age;
- Residing in a food stamp household that includes a child under 18 years of age;
or
- Pregnant.

ABAWD 15 percent Exemption - The 15 percent exemption is a temporary exemption that counties may grant to ABAWDs who have used their three out of 36 months without meeting the ABAWD work requirement and are unable to meet the work requirement

due to circumstances beyond their control. CDSS allocates 15 percent exemption months that counties may apply to ABAWDs.

Criteria for the 15 percent exemption are developed by counties and include such things as illiteracy, family crisis that interrupts FSET 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 FSET plan.

ABAWD Waiver - The Food and Nutrition Service (FNS) may approve 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 Department of Labor (DOL), having a recent unemployment rate above 10 percent, or having an unemployment rate 20 percent greater than the national average over a two-year period.

ABAWD Work Requirement and Three-Month Limit - Eligibility for food stamps is limited to three months in a 36-month period unless the ABAWD, who is age 18 to 49, meets the following work requirements:

- works 20 or more hours a week, averaged monthly;
- participates in an allowable work activity, such as an education or vocational training program for 20 or more hours a week; or
- participates in a workfare program.

ABAWDS can continue to receive food stamps for more than three months in a 36-month period if they meet the above work requirement or one of the following conditions:

- meet ABAWD exemption criteria,
- live in a county with an ABAWD waiver, or
- receive the 15 percent exemption.

Persons who fail to meet the ABAWD work requirement may regain eligibility if, during a 30-day period, they work, or participate in an allowable work activity for 80 hours, or participate in workfare for the required number of hours. Persons who regain eligibility and stop meeting the ABAWD requirement for reasons, such as

layoff, may receive food stamps for one grace period of three consecutive months during a 36-month period.

Assessment - An in-depth evaluation of employability skills often coupled with counseling on how and where to search for employment. If combined with work experience, some form of job search or job club, an assessment could constitute part of an approvable FSET component.

At-Risk ABAWD - An ABAWD who is residing in a non-waiver county and is in danger of losing food stamp eligibility due to exhaustion of the three-months-out-of-36-month time limit for persons not satisfying the ABAWD work requirement.

Component - A service, activity, or program, as described in the Manual of Policies and Procedures (MPP) Section 63-407.841, which is designed to help food stamp recipients gain skills, training, or work experience that will increase their ability to obtain regular employment and achieve self-sufficiency.

Within the FSET program, components are designated either as “work” or “non-work.” Work components consist of Workfare, Self-Initiated Workfare, On-The-Job Training (OJT) and Work Experience. Non-work components consist of Job Search, Job Club, Education, and Vocational Training. Individuals may be required to participate in multiple components simultaneously provided hours of participation do not exceed the maximum limit of 120 per month.

- Hours of participation in a work component are limited to the number obtained by dividing the household’s monthly food stamp allotment by the higher of the applicable federal or state minimum wage. In California, the current state minimum wage of \$8.00 per hour is higher than the federal minimum hourly wage of \$7.25.
- Hours in a non-work component can range from 12 to 120 per month.
- The maximum number of hours that can be required of an FSET participant is 30 per week or 120 per month.
- Effective October 1, 2009, FSET voluntary participants are not subject to the 120-hour limit established for mandatory participants. Hours of participation in FSET workfare components are not limited to the number determined by dividing the food stamp allotment by the minimum wage. This provision was added by Section 4108 of the Food, Conservation, and Energy Act of 2009 (the Farm Bill).
- An FSET program may include, but is not limited to, one or more of the following components:

Non-Work Components Defined

Supervised and Unsupervised Job Search - Requires participants to make a predetermined number of inquiries 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. 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 increasing motivation and self confidence. The component may consist of job search activities, job skills assessments, job finding clubs, job placement services, or other training or support activities.

Vocational Training - This component is designed to improve the employability of participants by providing training in a skill or trade that allows the participant to move directly into employment.

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), high school equivalency (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 educational components that establish a direct link to job readiness will be approved.

Federal FSET funds cannot take the place of nonfederal (i.e., state, local) funds for existing educational services. Federal Financial Participation (FFP) for operating education components may be authorized only for costs that exceed the normal cost of services provided to persons not participating in FSET.

Work Components Defined

Workfare -The food stamp recipients perform work in a public service capacity as a condition of eligibility. In lieu of wages, workfare participants receive compensation in the form of their household's monthly coupon allotment.

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.

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

Self-Initiated Workfare - This component is designed to assist ABAWDs in fulfilling their work requirement. In self-initiated programs ABAWDs voluntarily participate and find their own workfare job assignments. They are responsible for arranging to have their participation reported to their caseworkers and for verifying their workfare hours.

Work Experience or On-the-Job Training - This component is designed to improve the employability of participants through actual work experience and/or training, and enable them to move into regular employment. Work experience or on-the-job training assignments may not replace the employment of a regularly-employed individual; and, they must provide the same benefits and working conditions provided to regularly-employed individuals performing comparable work for comparable hours. It is permissible to place FSET participants in work experience positions with private sector entities.

Workforce Investment Act (WIA) Training - Under the WIA, job training services are developed, managed, and administered by state and local governments and the business community under WIA. Activities include basic skills training (GED, literacy), occupational skills training, on-the-job training, work experience, and job search assistance.

Alcohol or Drug Rehabilitation (AOD) and Mental Health (MH) Counseling - FSET components may include participation in AOD rehabilitation and MH counseling provided the following conditions are met:

- The AOD and/or MH counseling activities provide social and support services, such as discussion groups and general counseling that can be directly linked to the participant's employability.
- AOD and MH counseling are not treated as a separate component, but constitute a minor portion of the primary component to which they are linked.
- Hours of participation in AOD rehabilitation and MH counseling do not exceed 25 percent of the combined FSET activities; e.g., a 20-hour-per-week combination component might consist of 15 hours spent in vocational training with the remaining five hours devoted to participation in AOD treatment. When offered as part of a vocational training or educational activity, hours of participation in AOD or MH counseling count toward completion of the ABAWD work requirement.

In order to qualify for FSET program reimbursement, AOD or MH services must:

- Be reasonably necessary and directly related to FSET program component participation;
- Not be considered "medical" (i.e., a course of treatment provided by licensed physicians, psychologists)

- Not be available through another government program or available at no cost to the participant through a private source such as a charitable organization.
- Job Retention Services - Effective October 1, 2008, counties are authorized to provide job retention services for up to 90 days for FSET participants who gain employment. This activity was added by Section 4108 of the Food, Conservation, and Energy Act of 2009 (the Farm Bill).
- Section 4108 also removes the 30-hour-per-week FSET participation limit for those who volunteer to participate in an FSET component. Both of these provisions take effect October 1, 2009 and may be implemented at that time.

State agencies that opt to provide job retention services in FFY 2010 must include in their FSET plan a detailed description of the retention services they plan to provide. The description must identify the type, length, estimated cost, and portion of the food stamp population targeted to receive these services.

States may use their 100 percent federal allocation as well as 50 percent federal/50 percent state dollars to administer approved job retention services. Costs of participant reimbursement for transportation and ancillary expenses that are reasonably necessary and directly related to job retention services will be matched with 50 percent federal dollars. Unless the Food and Nutrition Service (FNS) approves the proposed services, federal funds may not be used to provide them.

Contractor - Any public or private entity that is providing FSET 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 FSET program.

Food Stamp Employment and Training Program - A county-administered program designed to assist food stamp recipients increase their employability and self-sufficiency through participation in job search, job club, workfare, education and/or vocational training components.

FSET Mandatory Participant - A FSP applicant or recipient who is neither exempt from food stamp work registration, nor deferred from participation in FSET. Typically, a county does not assign all mandatory participants to an FSET activity either because some participants are not targeted by the county to receive FSET services, or because FSET funds are insufficient to serve all participants.

Non-ABAWD - A work registrant that qualifies for one of the ABAWD exemptions at MPP Section 63-410.32, namely, under age 18 or over age 49, pregnant, or residing in a food stamp 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/on-the-job training (OJT), vocational training and education. Stand-alone FSET 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 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 person should or should not be referred to participate in an FSET program. This activity is not an approvable FSET component.

Volunteer - A food stamp recipient who chooses to participate in FSET and is either exempt from food stamp work registration or deferred from FSET participation. Volunteers are not subject to sanction for failure to comply with FSET requirements.

Workforce Development System - An interconnected strategy for providing comprehensive labor market and occupational information to job seekers, employers, providers of one-stop delivery of core services, providers of other workforce employment activities, and providers of workforce education activities. Each component of a county's FSET program must be delivered through its workforce development system. If the component is not available locally through such a system, the county may use another source.

Work Program - For purposes of satisfying the ABAWD work requirement, a work program is:

- A program under the Work Investment Act (WIA). Participation in job search activities of 20 hours or more per week under the WIA satisfies the ABAWD work requirement. This is not the case for the stand-alone FSET job search component at MPP Section 63-407.841.
- 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. Unlike stand-alone FSET job search, job search activities of 20 hours or more per week under the Trade Act satisfy the ABAWD work requirement.
- An employment and training program, including the FSET Program, other than a job search or job club component.

Note: To qualify for FSET funds, a work program must be included in the state FSET Plan, and it must adhere to the minimum and maximum participation requirements established for FSET.

Work Registrant - A non-assistance food stamp applicant or recipient who is subject to food stamp work requirements at Manual of Policies and Procedures (MPP) Section 63-407.4, unless the individual meets one of the work registration exemptions at MPP Section 63-407.21 (see list below).

Work Registration Exemptions - An individual is exempt from food stamp work registrant requirements if he/she meets one of the exemptions at MPP Section 63-407.21 (see list below):

- Younger than 16 years of age or 60 years of age or older;
- 16- or 17-year-old who is not head of 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;
- Half-time school attendance.

Work Registrant Requirements - As a condition of food stamp eligibility, every NAFS 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;
- Participate in the FSET program if assigned by the county;
- Provide sufficient information 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
- Must 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.

**Food Stamp Employment and Training (FSET)
County Plan Template and Instructions**

**COUNTY PLAN COVER SHEET
(To be completed by counties offering FSET in Federal Fiscal Year (FFY) 2010)**

County of
Prepared by:
Title:
Telephone:
Fax:
E-mail:
Date Submitted:

This template has been prepared by the California Department of Social Services (CDSS), Food Stamp Branch.

The due date for submission of county FSET plans to CDSS is November 5, 2009. County FSET plans will not be reviewed or approved unless they are submitted using the FFY 2010 FSET template.

PART I SUMMARY OF COUNTY FSET PROGRAM

Part I of the county FSET plan summarizes the FSET program that the county plans to implement. In this section, you will provide a narrative description of your county's FSET program. Please respond to each of the following requests for information:

1. **Program Changes** - Describe the nature of the changes, if any, being made to the FSET program.
2. **Program Components** – List the county's FSET components (do not describe the components). If a county offers job retention, it should be listed in this section and described in Part II.
3. **Sequencing of Components and Concurrent Assignments** - If it is intended that a person be placed in more than one component over the course of the FFY, describe the sequence in which the components will be assigned to the participant. If applicable, describe the assignment of a participant to multiple components at the same time.
4. **Other Related Employment Programs** - Identify other employment programs such as General Assistance (GA), CalWORKs, and county-run programs; and explain how these programs interface with FSET.
5. **Workforce Development System** – Identify those FSET components that will be offered through the county's Workforce Investment Act (WIA) one-stop centers and explain how they will be delivered. Discuss the means by which the county will provide components not offered through the system.
6. **Outcome Data** - Provide any FSET outcome data available to the county such as numbers of participants entering employment, types of employment found, wage rates, etc.

PART II FSET COMPONENT SUMMARIES

In completing this section, counties must remember the following:

- Assessment by itself is not a component/activity.
- Screening is not a component/activity.
- Hours of participation in a workfare, self-initiated workfare, or work experience component are determined by dividing the household's monthly food stamp allotment by the higher of the federal or state minimum wage.
- 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., Workfare/Alcohol and Drug Rehabilitation.
- The maximum number of hours that can be required of an FSET participant is 30 hours per week or 120 hours per month.
- If alcohol and drug rehabilitation and/or mental health counseling is offered, this activity must be described in the component summary for the primary component with which it is combined. For example, if a participant is required to participate in vocational training and alcohol and drug rehabilitation counseling, the counseling activities must be included in the detailed narrative description for the vocational training component.
- If job retention services are included in the county's FSET program, a complete description of these services must be provided using a component template with corresponding cost entries included on Table 1.
- In order to qualify for federal funds, a full description of the component must be in the plan; and it must adhere to all FSET requirements, including minimum and maximum participation requirements.

Use the following template in describing the county's FSET components. The cost of each component must be shown on Table 1.

1. **Component name**
2. **Component Activities** - Describe in detail the activities that comprise the component.
3. **Participation Requirements** - Identify the length of the component and the weekly/monthly participation requirements.
4. **Organizational Responsibilities** - Explain how the component is administered and identify the entities involved in administering it. Include an explanation as to how participation is monitored and reported.
5. **Geographic Areas Covered** - Identify the areas of the county where the component will be operative.
6. **Targeted Populations** - Identify who among the food stamp population is targeted to participate in the component.
7. **Anticipated Number of Able-Bodied Adults without Dependents (ABAWDs) Who Will Participate Each Month** -
This count includes both new and existing ABAWD participants expected to be in the component each month.

8. **Anticipated Number of Non-ABAWDs Who Will Participate Each Month** - This count includes both new and existing non-ABAWD participants expected to be in the component each month.
9. **Total Number of Persons Who Will Participate Each Month (7+8)** -
10. **Annual Component Participation [monthly total (9) multiplied by 12]** -
11. **Annual Cost of Component Administration** (This number must be the same as Table 1 Column D) - \$
12. **Average Cost Per Participant Per Month for Component Administration** [annual cost of the component (11) divided by annual component participants (10)] - \$
13. **Total Number of Participants Who Will Be Reimbursed for Transportation/Ancillary Services Each Month** [This number must not exceed the participant total in (10)]. This count includes both new and existing participants expected to receive a reimbursement each month. -
14. **Total Number of Participants Who Will Receive Reimbursements for Transportation/Ancillary Services During The Year** [monthly total (13) multiplied by 12] -
15. **Annual Cost of Transportation/Ancillary Services and Types of Services Provided** - If this number is 0, the county must explain how participant transportation needs and expenses are addressed in Part V, Section (2) (B). (This number must be the same as Table 1, Column F) - \$

If ancillary expenses such as books, tools, or work clothing are provided for participants in a component please describe the reimbursable ancillary expenses.
16. **Average Cost Per Participant Per Month for Transportation/Ancillary Services** [annual cost for participant reimbursements (15) divided by annual number of persons reimbursed (14)] - \$
17. **Total Number of Participants Who Will Be Reimbursed for Dependent Care Each Month** - [This count includes both new and existing participants expected to receive a reimbursement each month and must not exceed participant total in (10)]
18. **Total Number of Participants Who Will Receive Dependent Care Reimbursements During The Year** [monthly total (17) multiplied by 12] -

19. **Annual Cost of Dependent Care** [This number must be the same as Table 1, Column E] - \$

20. **Average Cost Per Participant Per Month for Dependent Care** [annual cost for dependent care (19) divided by annual number of persons reimbursed (18)] - \$

Part III WORK REGISTRANTS, ABAWDS, AND FSET PARTICIPATION

County estimates for work registrants and ABAWDs should be reasonably accurate projections that are consistent with numbers previously reported by the county on the following reports:

- *The Annual Work Registrant and Food Stamp Employment and Training (FSET) Program Caseload Report (STAT 48)*
- *The Food Stamp Program Work Registrant, Able-Bodied Adults Without Dependents (ABAWD), and Food Stamp Employment and Training (FSET) Program Caseload Report (STAT 47)*

Data tables for the STAT 48 and STAT 47 can be found at the following two websites:
<http://www.cdss.ca.gov/research/PG359.htm>
<http://www.cdss.ca.gov/research/PG360.htm>

A. Work Registrant Population

1. Work Registrant Counts - Estimate the following:

- a. The number of work registrants in the existing food stamp caseload expected to be in the county on October 1, 2009. (See STAT 48)
- b. The anticipated number of new work registrants to be added between October 1, 2009 and September 30, 2010. (See STAT 47)
- c. The total number of work registrants in the county between October 1 and September 30 of the fiscal year (a+b=c).

2. Unduplicated or Duplicated Work Registrant Count

The Food and Nutrition Service (FNS) requires states to give an unduplicated count of work registrants. By unduplicated, we mean the following:

- Individuals included in the work registrant count as of October 1 are not included in any subsequent count of work registrants for the remaining months of the year.

- Individuals certified for food stamps or registered for work more than once in a 12-month period are only reported as a work registrant once during that 12-month period.
 - a. Indicate whether the count of work registrants is unduplicated or duplicated. If the count is unduplicated, describe the method used to eliminate multiple registrations. If the county is not able to produce an unduplicated count, describe how the county reports this number to CDSS. Report any plans to adopt a system to eliminate duplicate counts, including a time frame as to when the system is expected to be operational.
 - b. Provide a clear explanation of the methods used to estimate work registrant and ABAWD counts. Use data from the current fiscal year whenever possible in formulating the projection. Be as accurate as possible in developing these estimates.

B. Deferral Policy

Counties may temporarily defer from FSET participation categories of work registrants or individual work registrants not included in any other deferral category. FSET deferrals are listed at MPP Section 63-407.811.

1. Using the table below, identify the county’s FSET deferral criteria and identify the estimated number of persons who will be deferred:

Reason For Deferral	Number of Work Registrants Deferred
a. participates in a substitute program that has participation requirements that exceed FSET participation requirements	
b. lacks dependent care	
c. Lacks transportation to an FSET Program site	
d. lives an unreasonable distance from the FSET 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. total number of deferred work registrants [add (a) through (h)]	

2. Indicate the frequency with which deferrals are re-evaluated

C. ABAWD Population

With the passage of the American Recovery and Reinvestment Act of 2009 (ARRA), the restrictions on food stamp eligibility for ABAWDs have been lifted from April 1, 2009 through September 30, 2010. This provision supersedes the statewide waiver so that all existing ABAWD calendars were stopped effective April 1, 2009. During this time, food stamp recipients must not be discontinued solely for failure to satisfy the ABAWD work requirement. This provision also applies to CFAP households. However, for purposes of reporting data on the Stat 47 and providing estimates in their FSET plans, counties must continue to count and report those persons who would otherwise be subject to the ABAWD work requirement if the ARRA were not in effect. ABAWDs are still subject to sanctions for failure to comply with FSET requirements. For additional information, see All County Letter 09-12.

Note: The ABAWD population is a subset of the work registrant population. There are always fewer ABAWDs than there are work registrants because there are added exemptions from the ABAWD work requirement which do not apply to work registration. Persons not exempt from the ABAWD work requirement are included in the county's ABAWD population even if they reside in a waiver county or are granted the 15 percent exemption.

1. ABAWD Counts - Estimate the following:

- a. The number of ABAWDs in the existing food stamp caseload expected to be in the county on October 1, 2009.
- b. The anticipated number of new ABAWDs to be added between October 1, 2009 and September 30, 2010.
- c. The total number of ABAWDs in the county between October 1 and September 30 of the fiscal year ($a+b=c$).

2. Unduplicated or Duplicated ABAWD Count

Note: ABAWD counts on the STAT 47 are duplicate counts. Counties should adjust their ABAWD numbers to reflect an unduplicated estimate.

- a. Explain whether this count is duplicated or unduplicated. If the count is unduplicated, describe the method used to count an individual only once during the year. If the count is duplicated, explain the method used to eliminate the portion of ABAWDs believed to be duplicated and detail the methodology used to make this determination.

D. FSET Participation

This section asks for both an annual count of component placements and an individual count of FSET participants. In completing section 1 *Estimated FSET Component Placements*, counties should base their calculations on annual participant counts in Part II of this template. Section 1 is a duplicate count as a participant is counted as placed for each month of participation in an FSET component. An ABAWD who participates for three months in workfare would receive three placement counts. The count is further duplicated as participants are counted for each qualifying component in which they are placed. If the ABAWD who participated for three months in workfare also participates for three months in education, that same individual would receive three additional placement counts.

Qualifying components are those which satisfy the ABAWD work requirement and consist of workfare, self-initiated workfare, work experience, education, and vocational training. Non-qualifying components are those which do not satisfy the ABAWD work requirement and consist of job search and job club components with the exception of those offered under WIA or the Trade Act of 1974.

1. Estimated FSET Component Placements

- a. Identify the estimated number of ABAWD applicants and recipients expected to participate in a qualifying ABAWD component each month.
- b. Identify the estimated number of all other applicants and recipients expected to participate in a component each month, i.e., ABAWDs in non-qualifying activities and non-ABAWDs in both qualifying and non-qualifying activities.
- c. Identify the total number of applicants and recipients expected to participate in a component each month during the fiscal year (a+b).

2. Estimated Individual Participation

- a. Provide an estimated count of individuals expected to participate in the FSET program during the fiscal year.

Note: Each individual must only be counted once for the year regardless of the number of components the individual will be assigned to or the anticipated number of months the individual will participate.

PART IV PROGRAM COORDINATION

- A. General Program Coordination** – In this part, clearly describe how the FSET program relates to other processes in the Food Stamp Program.

1. Narrative Coordination Statement - Describe the linkages between the following food stamp functions and the FSET program:

- Intake, application, and recertification;
- Work registration;
- Screening for FSET participation;
- FSET component assignment;
- Monitoring compliance with component requirements;
- Determination of good cause;
- Preparation of the Notice of Adverse Action; and
- Disqualification due to noncompliance with program requirements.

2. Information Coordination – Describe how information will be coordinated and exchanged (e.g., forms, computer linkages, documentation of participant status and actions taken). Include a description of the intake and disqualification processes, including the procedures established to ensure that appropriate disqualification actions are begun within ten days following a determination of no good cause.

3. Coordination Time Frames – Describe time frames associated with the FSET program and the major Food Stamp Program functions (e.g., how much time elapses between application for food stamps and referral into the FSET program and between a finding of noncompliance and initiation of a notice of disqualification).

B. Interagency Coordination – The FSET program should be coordinated as closely as possible with other relevant programs and agencies to maximize the use of all resources to assist food stamp applicants and recipients in improving their employability and self-sufficiency. Describe the linkages between the FSET program and other programs.

1. Areas of Coordination – Identify agencies or programs that FSET is linked to and explain how the programs are linked together. Agencies or programs with which the FSET program has linkages may include the Employment Development Department (EDD), community colleges, vocational education agencies, adult education schools, social service agencies, CalWORKs Welfare-To-Work, one-stop centers established under the Work Investment Act (WIA), and the county's GA program.

2. Methods of Coordination - Specify the methods of coordination between FSET and the agencies/programs identified in Item 1 above. Methods of coordination may include non-financial interagency agreements, contracts for provision of services, joint plans of operation, and informal referrals to other agencies or programs.

C. Contractual Arrangements – If the county anticipates contracting out any portions of the FSET program, provide a narrative description of the county’s contractual arrangements. List the various contractors, the services they will provide, and the cost of each contract. Please be specific and thorough in the description of services to be provided. All contracts must be maintained by the county and be available for review by CDSS and FNS upon request.

D. Summary of County Administration and Interagency Coordination for the FSET Program

In this section, summarize the means by which the county administers the FSET program, including its collaboration with other agencies and programs. The county may involve other entities in administering their FSET program, contract for the provision of services, maintain interagency agreements, or informally refer participants to outside organizations.

For each entry on the following table, list the agencies involved, the number of FSET placements expected to be made, and the method of coordination. [e.g., memoranda of understanding (MOUs), subcontracts.] If a given entry is not applicable to the county’s FSET program, simply insert N/A in column 1.

Coordination Areas	Agencies Involved	Number of FSET Placements Expected	Methods of Coordination
Delivers an FSET component			
The FSET program delivers a service for another agency or program			
Joint component of the FSET program and another agency or program			
Referral of individuals from the FSET program to another program or agency			
Other forms of coordination (specify)			

PART V
PROGRAM COSTS AND FINANCIAL MANAGEMENT

Note: Approval of the county's estimated FSET budget does not constitute approval for the release of funds. Approval and release of FSET funds to the county is contingent upon issuance of a County Fiscal Letter providing the county's FSET allocation and submission of the County Expense Claim, which must reflect actual allowable expenditures.

A. Planned Costs of the County FSET Program

- 1. Operating Budget** - Provide a narrative description of the costs of the FSET program identified on Table 1. Costs are allowed only with prior approval from CDSS and must be adequately documented to ensure that they are necessary, reasonable, and properly allocated to the FSET program. If the county plans to use interagency agreements involving a transfer of funds to another agency of the county government, address the basis of charges for food stamp participants and the method for monitoring the agreements.

- 2. Justification of Education Costs** - Federal FSET funds, whether 100 percent or 50 percent reimbursement matching funds, must not be used to supplant non-federal funds being used for existing services and activities. Thus, counties are prohibited from using federal FSET funds to pay for education services if such services can be funded with state and local dollars. Counties may use federal FSET funds to operate an approved education component only to the extent that FSET component costs exceed the normal cost of services provided to students not participating in FSET.

If the FSET plan includes education components, explain why the cost of such components can only be met through FSET and not through other existing education programs. Specify whether or not the services being provided are available to persons other than FSET participants and if so, identify the cost of providing these services.

- B. Participant Reimbursement** – The county is responsible for reimbursing participants for necessary and reasonable expenses incurred in fulfilling FSET requirements. Expenditures that may be included in this category are transportation, dependent care, books, training manuals, uniforms or other special equipment, and any other necessary, reasonable, and properly allocated cost that a participant incurs for participation in the FSET program. Participant reimbursements must not be paid for with 100 percent federal grant or 50 percent matched administrative cost funding. To ensure compliance with FSET funding requirements, counties should read Section B of the attached policy guidelines.

1. Method of Participant Reimbursement

- a. Describe whether the county will reimburse participants based on the actual cost of participation or based on some other method developed by the county.
- b. If the county wants to provide allowances for transportation and costs other than dependent care based on the average costs of participating in FSET, describe the method to be used in determining average expenditures.
- c. If the county chooses to provide or arrange for dependent care services, describe the services to be provided, the referral process to the service provider, and the payment processes.

2. Procedure for Participant Reimbursement - Counties may provide up-front allowances, or they may reimburse participants for actual expenses.

- a. Clearly describe the procedure to be used for reimbursing participants.
- b. Explain how costs will be reported if other agencies are given responsibility for providing reimbursements.

C. Cost Allocation

1. Describe the basis for allocating costs if the FSET program is being administered in conjunction with other employment programs serving recipients of other forms of assistance.
2. If FSET is offered in conjunction with other employment programs, summarize how shared costs will be allocated among these programs.

PART VI PROGRAM REPORTING AND MANAGEMENT INFORMATION

Counties are advised to read section E of the policy guidelines issued with this template before completing this part.

A. Meeting Ongoing Federal Reporting Requirements – Describe how FSET data will be compiled, including:

1. **Method of Gathering Data** - Describe the method used to gather work registration and ABAWD data; e.g., automated systems, aggregated hard copy reports from local agencies.
2. **Local reporting requirements** - Specify whether contractors will be required to submit regular reports to the county, identify the information that will be contained

in such reports, and note the frequency with which local agencies and contractors must report data.

B. Organizational Responsibility

1. Person responsible for work registrant and ABAWD reporting

Name:
Title:
Department/Agency:
Phone Number:
Fax:
E-mail Address:

2. Person responsible for preparing the FSET plan

Name:
Title:
Department/Agency:
Phone Number:
Fax:
E-mail Address:

3. Person responsible for FSET financial analysis and claims

Name:
Title:
Department/Agency:
Phone Number:
Fax:
E-mail Address:

Part VII FSET BUDGET FOR FFY 2010

The following two tables capture the county's FSET budget for FFY 2010. Table 1 breaks out county expenditures by FSET component and Table 2 breaks out expenditures by funding source (i.e., federal and county dollars).

Instructions for Completing Table 1

1. Use actual spending for the current operating year as a starting point for future budget projections, not the levels projected in previous county FSET plans.
2. The grand total on Table 1 must equal the grand total on Table 2.
3. If two or more activities are offered concurrently, separate all of the costs appropriately between the activities.
4. For each component where assessment costs are applicable, those costs must be included in the *Salary & Benefits* column of the appropriate component.

5. Charge contract costs of drug and alcohol rehabilitation, mental health counseling, and enhanced supportive services to the accompanying component in column C.

TABLE 1

OPERATING BUDGET

		A	B	C	D	E	F	G
	Component	Salary & Benefits	Other Costs (Overhead)	Contract Costs	Sub-total (A thru C)	Dependent Care	Transportation / Ancillary	Total (D+ E+F)
1	Job Search							
2	Job Club							
3	Workfare							
4	Self-Initiated Workfare							
5	WE or OJT							
6	Vocational Training							
7	Education							
8	Job Retention							
9	Other							
10	Subtotals (Lines 1 thru 9)							

WE = Work Experience, OJT = On-the-Job Training

TABLE 2: FFY 2010 PLANNED COSTS BY FUNDING CATEGORY

COUNTY: _____

	<u>Funding Categories</u>	<u>Estimates of Cost</u>
1	100 Percent Federal FSET 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) <i>Must agree with Table 1's Grand Total Cost</i>	