



CDSS

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**DEPARTMENT OF SOCIAL SERVICES**

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ARNOLD SCHWARZENEGGER  
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

September 20, 2010

ALL-COUNTY INFORMATION NOTICE NO. I-55-10

TO: ALL COUNTY WELFARE DIRECTORS

SUBJECT: FEDERAL FISCAL YEAR 2011 PLAN TEMPLATE, POLICY GUIDELINES AND ALLOCATIONS 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) 2011 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 regulations, 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 2011, California has been granted a federal FSET allocation of \$7,128,081, which includes \$808,000 that will be used to cover state administrative costs and to provide workers' compensation coverage for FSET participants. Twenty-five counties have indicated their intent to operate an FSET program in FFY 2011. FSET funds have been distributed among these counties based on their average monthly caseload. Please refer to the attached list, which shows the distribution 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 2011 has been edited for greater clarity and accuracy. 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 2011 template must be used for plan completion and all previous versions of the template should be disregarded.

A clear understanding of FSET terminology, funding rules, and participation requirements is essential to preparing a state-approved FSET plan and effectively administering an FSET program. Therefore, we have attached updated and expanded policy guidelines for use by counties as they design and administer their FSET programs. The guidelines cover a variety of subjects and are provided to help counties gain a fuller and more accurate understanding of FSET requirements. 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.

In preparing their FSET plans, it is important that counties provide reasonably accurate estimates of their work registrant and ABAWD populations for FFY 2011. Counties should be able to use the data from their most recent work registrant and ABAWD statistical reports to assist in the development of FFY 2011 estimates. Work registrant and ABAWD data is included in the following reports:

- The Annual Work Registrant and Food Stamp Employment and Training (FSET) Program Caseload Report (STAT 48); and
- 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 <http://www.dss.cahwnet.gov/research/> under Food Stamps, and then under Food Stamp Data Tables.

Counties are reminded that FNS utilizes the work registrant data from the STAT 47 and 48 forms to determine each state's future allocation of FSET funds. Therefore, it is essential that these reports be completed 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 Kristin Brinks, Manager of the Employment and Special Project Unit, at [kristin.brinks@dss.ca.gov](mailto:kristin.brinks@dss.ca.gov). The contact information should include the name, title, address, telephone number, fax, and e-mail address of the individual who will be responsible for preparing the FSET plan.

The deadline for submitting your county's FSET Plan is October 25, 2010. Please forward an electronic copy in Microsoft Word and subsequently mail a signed hard copy to:

ATTN: Kristin Brinks, Manager  
Food Stamp Employment and Training Program  
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

<b>County</b>	<b>Average Monthly Caseload FY 2009-10</b>	<b>% to Total</b>	<b>FSET 100 % Federal Grant Allocation</b>
ALAMEDA	37,685	0.049816	314,841
HUMBOLDT	5,473	0.007235	45,726
KERN	36,163	0.047804	302,125
LOS ANGELES	303,410	0.401077	2,534,839
MARIN	3,360	0.004442	28,074
MENDOCINO	5,303	0.007010	44,304
MONTEREY	10,076	0.013319	84,177
NEVADA	1,542	0.002038	12,880
ORANGE	45,610	0.060292	381,050
PLACER	4,431	0.005857	37,017
RIVERSIDE	55,502	0.073368	463,692
SACRAMENTO	51,940	0.068659	433,930
SAN DIEGO	54,353	0.071849	454,091
SAN FRANCISCO	21,663	0.028636	180,982
SAN JOAQUIN	12,993	0.017175	108,547
SAN LUIS OBISPO	4,801	0.006346	40,107
SAN MATEO	3,224	0.004262	26,936
SANTA BARBARA	7,141	0.009440	59,662
SANTA CLARA	27,856	0.036823	232,724
SANTA CRUZ	6,882	0.009097	57,494
SHASTA	5,940	0.007852	49,625
SONOMA	9,463	0.012509	79,058
STANISLAUS	21,485	0.028401	179,497
TRINITY	645	0.000853	5,392
VENTURA	19,548	0.025840	163,311
<b>TOTALS</b>	<b>756,489</b>	<b>100.0000%</b>	<b>\$6,320,082</b>

**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) 2011)**

<b>County of</b>
<b>Prepared by:</b>
<b>Title:</b>
<b>Telephone:</b>
<b>Fax:</b>
<b>E-mail:</b>
<b>Date Submitted:</b>

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 October 25, 2010. County FSET plans will not be reviewed or approved unless they are submitted using the FFY 2011 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:*

- A. Program Changes** - Describe the nature of the changes being made to the FSET program.
- B. 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.
- C. 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.
- D. 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.
- E. 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.
- F. 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 PROGRAM SUMMARIES AND FSET PARTICIPATION COUNTS

**Note: Counties are encouraged to read the definitions of FSET program components contained in Section F of the attached policy guidelines.**

### A. Component Summaries

In this part, counties must provide a detailed and clearly written description of each FSET component being offered in FFY 2011. Components will only be approved if required activities and hours of participation are consistent with federal and state FSET 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.
- 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.
- If an FSET component is a voluntary component, food stamp 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 volunteer and clarifies that sanctions are not imposed for noncompliance.

*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 Description** – Provide a detailed description of the FSET 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, time frames for component participation, 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 specific.
3. **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.
4. **Organizational Responsibilities** –Identify the various entities involved and their respective roles in administering the component. Organizational responsibilities include such things as conducting assessments of participants' skills and needs, providing participants with instruction and training through one on one and group settings, monitoring and tracking FSET participation, making good cause determinations, and issuing notices of disqualification.
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 (9)]. 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 (B, entry 1). (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 the participant total in (9)]
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)] - \$

## **B. FSET Participation**

This section asks for both an annual count of component placements and an individual count of FSET participants. Do not complete this section for each component summary, but base placement counts on cumulative data from all component summaries. In completing section 1 (*Estimated FSET Component Placements*), counties should base their calculations on annual participant counts for all components in Section A of this part. 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 all ABAWD placements in qualifying components for the year. Count each ABAWD as placed for each month of participation in each qualifying component. Remember that additional placements are counted if the same ABAWD participates in more than one qualifying component. -
- b. Identify the estimated annual number of all component placements not included in item a. Count each individual not identified in (a) as placed for each month of participation in each FSET component. This includes ABAWDs placed in non-qualifying activities and non-ABAWDs placed in any FSET component. Remember that additional placements are counted if the same individual participates in more than one activity. -
- 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**

Unlike Section 1, this section asks for an unduplicated count of FSET participants. 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. Thus, an individual who participates in job search for

two months followed by workfare for three months would only be counted once in this section.

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

### **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>

Counties are encouraged to review the above data reports and Section C of the attached policy guidelines prior to preparing their estimates. Definitions of work registrants and ABAWDs may be found in Section F of the attached guidelines.

Please be as accurate as possible in developing your county's work registrant and ABAWD estimates. Use data from the current fiscal year, whenever possible, in formulating the projection.

#### **A. Work Registrant Population**

##### **1. Work Registrant Counts - Estimate the following:**

- i. The number of work registrants in the existing food stamp caseload expected to be in the county on October 1, 2010. (See Part A, entry 1 of the STAT 48 form) -
- ii. The anticipated number of new work registrants to be added between October 1, 2010 and September 30, 2011. (This estimate should be reasonably consistent with the cumulative total of four consecutive quarters worth of data from Part A, entry 1 of the STAT 47 report) -

- iii. 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**

To the best of their ability, counties are required to give an unduplicated count of work registrants. Individuals included in the work registrant count on October 1 should not be included in any subsequent count of work registrants for the remainder of the year (see Part A, item 1 of the STAT 48). In addition, individuals certified for food stamps or registered for work more than once in a 12-month period should only be 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.
- b. 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. Deferral Policy**

Counties may temporarily defer work registrants from FSET participation. FSET deferrals are listed at 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.

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

Reason For Deferral	Number of Work Registrants Deferred
A. lacks dependent care	
B. lacks transportation to an FSET Program site	
C. lives an unreasonable distance from the FSET program site	
D. has a severe family crisis	
E. temporarily unemployed and expected to return to work within 60 days	
F. involved in legal difficulties	
G. has a temporary illness or disability	
H. Other	
i. total number of deferred work registrants [add (a) through (h)]	

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

**C. ABAWD Population**

**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. For FFY 2011, the entire state of California is under a waiver of the ABAWD work requirement. Nevertheless, counties are still required to count and report the number of ABAWDs residing in their county.

- a. ABAWD Counts - Estimate the following:
  - i. The number of ABAWDs in the existing food stamp caseload expected to be in the county on October 1, 2010. -

- ii. The anticipated number of new ABAWDs to be added between October 1, 2010 and September 30, 2011. -
- iii. The total number of ABAWDs in the county between October 1 and September 30 of the fiscal year (a+b=c). -

b. 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.

- i. Explain whether this count is duplicated or unduplicated.
- ii. 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. Meeting Ongoing Federal Reporting Requirements**

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

- 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. This includes the point in time work registrant and ABAWD counts on October 1 and the count of work registrants and ABAWDs for the remainder of the year.
- 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.

**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 in narrative form 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 administer FSET internally, work in concert with other employment and training programs, 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 estimated number of FSET placements expected in the FFY, and the method of delivering FSET services [e.g., memoranda of understanding (MOUs), contracts, or informal referrals.] For all entries which are not applicable to the county’s FSET program, insert N/A in the column entitled Agencies Involved.

Note: Placement counts are duplicated as a participant is counted as placed for each month of participation.

<b><u>FSET Administration</u></b>	<b><u>Agencies Involved</u></b>	<b><u>Number of FSET Placements Expected</u></b>	<b><u>Methods for Delivering Services</u></b>
<b>Delivers an FSET component</b>			
<b>The FSET program delivers a service for another agency or program</b>			
<b>Joint component of the FSET program and another agency or program</b>			
<b>Referral of individuals from the FSET program to another program or agency</b>			
<b>Other forms of coordination (specify)</b>			

**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. The narrative should include such things as the number of positions represented by the cost for salary and benefits, examples of FSET overhead expenditures, the types and number of contracts used to deliver FSET services, and the various transportation and ancillary services that will be provided to FSET participants.

Costs are allowed only with 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. Type of Participant Reimbursement**

- a. Identify those transportation, ancillary and dependent care expenditures for which participants are reimbursed with FSET dollars.
- b. If FSET funds are not used to pay for the cost of transportation, explain how participants are reimbursed for transportation costs incurred while participating in FSET.

### **2. Method of Participant Reimbursement**

Counties may choose between two methods for reimbursing participants. The county can either reimburse participants for actual expenses incurred, or reimburse based on some other method established by the county.

- a. Explain 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, identify the services to be provided (e.g., preschool, extended day care for school children, adult care for the elderly and infirm). Describe the procedures for reimbursing the service provider.

### **3. 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. If counties typically provide reimbursements after expenses have been incurred, explain what steps are taken to enable the participant to begin his or her FSET assignment e.g., up front bus tokens or advance payments are provided at the time of component placement.
- 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  
PLAN CONTACT INFORMATION**

In this section, counties shall provide the names and contact information for those persons in the county who have primary responsibility for gathering work registration and ABAWD data, completing the FSET plan, and preparing FSET financial reports and claims. Use the following table to summarize FSET contact information. Please ensure that all entries are completed.

<b>Person responsible for work registrant and ABAWD reporting.</b>	<b>Person responsible for preparing the FSET plan.</b>	<b>Person responsible for FSET financial analysis.</b>
Name:	Name:	Name:
Title:	Title:	Title:
Department/Agency:	Department/Agency:	Department/Agency:
Phone Number:	Phone Number:	Phone Number:
Fax:	Fax:	Fax:
E-mail address:	E-mail address:	E-mail address:

**Part VII  
FSET BUDGET FOR FFY 2011**

*The following two tables capture the county’s FSET budget for FFY 2011. 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**

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

**TABLE 2: FFY 2011 PLANNED COSTS BY FUNDING CATEGORY**

COUNTY: \_\_\_\_\_

	<u>Funding Categories</u>	<u>Estimates of Cost</u>
<b>1</b>	<b>100 Percent Federal FSET Grant</b>	
<b>2</b>	<b>Overmatch for Administration Cost</b>	
<b>2a</b>	50 Percent Federal	
<b>2b</b>	50 Percent County	
<b>2c</b>	<u>Subtotal</u> for Overmatch ( <b>2a + 2b</b> )	
<b>3</b>	<b>Participant Reimbursement for Transportation/Ancillary</b>	
<b>3a</b>	50 Percent Federal	
<b>3b</b>	50 Percent County	
<b>3c</b>	<u>Subtotal</u> for Transportation/Ancillary ( <b>3a + 3b</b> )	
<b>4</b>	<b>Participant Reimbursement for Dependent Care</b>	
<b>4a</b>	50 Percent Federal	
<b>4b</b>	50 Percent County	
<b>4c</b>	<u>Subtotal</u> for Dependent Care ( <b>4a + 4b</b> )	
<b>5</b>	Grand Total of Planned Cost (1+2c+3c+4c) <i>Must agree with Table 1's Grand Total Cost</i>	

## **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 2011 Federal Fiscal Year (FFY).

If a county proposes to make any substantive change to its FSET program after their FSET plan for FFY 2011 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 50 percent matched 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 county funds.

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).

## 3. Funding Requirements For FSET Education Components

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

- Federal funds—whether 100 percent or 50 percent reimbursement—made available to operate an education component must not be used to supplant non-Federal funds being used for existing services and activities. Federal funds may only be used to operate an approved education component to the extent that FSET component costs exceed the normal cost of services provided to students not participating in FSET.
- Costs not charged to the general public cannot be charged to the FSET program. Nor, can these costs be used to draw down a federal 50 percent reimbursement for administration of an FSET 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-FSET students or offered at cost. These components and services must be outlined in the State FSET plan and approved by FNS. Tuition, case management and other support services are allowable costs and can be paid for with federal and county dollars.

## 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 that include those 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. 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 15<sup>th</sup> 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). Individuals are also exempt if they are:

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

- Working 20 or more hours a week, averaged monthly.
- Participating in a workfare or work experience program.
- Participating in an allowable work activity for 20 or more hours a week. For

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

- A program under the Work Investment Act (WIA).
- 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 FSET Program. FSET Stand alone job club and job search components do not satisfy the ABAWD work requirement.

ABAWDS may not receive food stamps for more than three months within a 36-month period unless they meet the above work requirement, qualify for an ABAWD exemption, live in a county where the work requirement is waived, or are granted 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 three consecutive months. The three consecutive months is available only once 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 out of 36-month time limit for persons not satisfying the ABAWD work requirement.

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 program components which include job search, job club, workfare, work experience, education, and/or vocational training.

FSET Component - A service, activity, or program 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.

- An FSET program may include, but is not limited to, one or more of the following components:

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 compliance with job search include written reports submitted by participants as well as random phone calls. Some counties offer job search as a stand-alone activity while others combine it with other FSET components, such as job club. 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. 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. Some counties offer job club as a stand-alone activity while others combine it with job search or other FSET components.

Vocational Training - This component is designed to improve the employability of FSET 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 community-based organizations, adult schools, community colleges, the WIA, Private Industry Council programs, and Regional Occupational Programs.

For the purpose of federal FSET funding requirements, vocational training is considered education. Section B, sub-section (3) of these guidelines identifies funding requirements and limitations for education and vocational training components.

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 those education components that establish a direct link to job readiness will be approved. Section B, sub-section (3) of these guidelines identifies funding requirements and limitations for education and vocational training components.

Workfare – In this component, participants perform 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, the CWD 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, and 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 food stamp sanctions are not imposed for failure to participate. Some counties provide participants with a list of community based organizations from which to locate their assignments. Participants are responsible for arranging to have their participation verified and reported to their case workers.

Work Experience - 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 allows participants to develop basic skills and reinforce existing skills. Participants are placed into non-salaried assignments with public and/or private non-profit agencies.

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

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 - Counties are authorized to provide job retention services for up to 90 days for FSET participants who gain employment. Costs for which participants may be reimbursed include 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 FSET 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 II of their FSET plan and include job retention costs on Table 1.

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.

FSET Participation Requirements – Federal legislation and regulations contain the following minimum and maximum participation requirements for the FSET program.

- Hours of participation in a workfare, self-initiated workfare, or work experience 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. Persons who voluntarily participate in FSET are not subject to this hourly limit.
- Hours of participation in job search, job club, education, or vocational training can range from 12 to 120 per month.

- The maximum number of hours that can be required of a mandatory FSET participant is 30 per week or 120 per month. These limit do not apply to voluntary participants.

Mandatory Participant - A food stamp 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, 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. Screening is not an FSET component.

Volunteer - A food stamp recipient who voluntarily participates in FSET. Volunteers can include both food stamp work registrants and persons exempt from food stamp work registration. Volunteers are not subject to sanctions 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 Registrant - A non-assistance food stamp applicant or recipient who does not meet one of the work registration exemptions at MPP Section 63-407.21 (see list below). Work registrants are subject to food stamp work requirements at MPP Section 63-407.4.

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-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
- 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.