

July 2, 2019

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

**EXECUTIVE SUMMARY**

**ALL COUNTY LETTER NO. 19-48**

This letter is intended to provide guidance to County Welfare Departments (CWDs) regarding the options available for clients to participate in welfare-to-work (WTW) education or training activities, including secondary school or the equivalent and the postsecondary education, while receiving 48-months of CalWORKs assistance.



KIM JOHNSON  
DIRECTOR

STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY  
**DEPARTMENT OF SOCIAL SERVICES**  
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GAVIN NEWSOM  
GOVERNOR

July 2, 2019

ALL COUNTY LETTER (ACL) NO. 19-48

TO: ALL COUNTY WELFARE DIRECTORS  
ALL CALWORKS PROGRAM SPECIALISTS  
ALL COUNTY WELFARE-TO-WORK COORDINATORS  
ALL COUNTY CONSORTIA PROJECT MANAGERS  
ALL COUNTY REFUGEE COORDINATORS  
ALL TRIBAL TANF ADMINISTRATORS

SUBJECT: CALIFORNIA WORK OPPORTUNITY AND RESPONSIBILITY TO  
KIDS (CalWORKs) WELFARE-TO-WORK (WTW) OPTIONS FOR  
PURSUING EDUCATION ACTIVITIES

REFERENCES: [ASSEMBLY BILL \(AB\) 818](#) (CHAPTER 141, STATUTES 2017), [AB 1604](#) (CHAPTER 303, STATUTES 2017), AND [SENATE BILL \(SB\) 1041](#) (CHAPTER 47, STATUTES 2012); [WELFARE AND INSTITUTIONS CODE \(WIC\) SECTION 11325.5](#), [WIC 11325.23](#), [WIC SECTION 11322.85](#), [WIC SECTION 11322.86](#), AND [WIC SECTION 11322.87](#); [ALL COUNTY LETTER \(ACL\) NO. 18-95](#), [ACL 18-41](#), [ACL NO. 18-40](#), [ACL NO. 15-03](#), [ACL NO. 15-02](#), [ACL NO. 15-01](#), [ACL NO. 14-47](#), [ACL NO. 14-09](#), [ACL NO. 12-67](#); [MANUAL OF POLICIES AND PROCEDURES \(MPP\) SECTION 42-716](#), [MPP SECTION 42-713](#), [MPP SECTION 42-712](#), [MPP SECTION 42-711](#), [MPP SECTION 42-709](#), AND [MPP SECTION 42-708](#)

The purpose of this ACL is to clarify how the CalWORKs program provides clients the opportunity to participate in WTW education or training activities, including secondary school or the equivalent and the postsecondary education, while receiving 48 months of CalWORKs assistance.

### **Background**

The California Department of Social Services (CDSS) encourages County Welfare Departments (CWDs) to support the educational goals, opportunities, and pathways of CalWORKs clients. Research demonstrates that completion of high school or the equivalent and postsecondary education boosts social and economic mobility of low-income families, and that a parent's level of education can positively impact a child's future success. The CDSS requests that CWDs review current practices and maximize partnerships with local high schools, adult education providers, community colleges, and other key stakeholders to provide clients exhibiting education needs with intensive case management. This is a meaningful and important support to provide CalWORKs clients with educational goals and strongly aligns with the program objective of moving families toward self-sufficiency.

### **WTW Overview**

Unless exempt, adults on CalWORKs are required to participate in WTW activities as a condition of receiving aid. The WTW program provides activities, services, and work supports designed to help clients find and maintain employment. An important subset of these WTW services are education and training activities to help clients progress in their education goals and gain needed skills and academic preparation for employment. The decision to pursue educational or other activities shall be discussed with the client during assessment, in accordance with MPP Section 42-711.533(b). The client may choose to participate in WTW education activities via distance learning without additional participation standards as prescribed in MPP Section 42-716.621.

Please note that clients may come onto aid already engaged in an educational program, and, upon meeting certain requirements in accordance with MPP Section 42-711.54, may be approved for a Self-Initiated Program (SIP). Alternatively, the client may begin an educational program after coming onto aid as a result of conversations with their caseworker during assessment.

The WTW program provides clients up to 48 months available time to pursue education and training activities through the following program components:

**1) WTW 24-Month Time Clock (WTW 24-MTC)** - provides a cumulative 24-month period of flexible activities during which a client may address employment barriers, prepare for and seek employment, and engage in education and training without restriction;

**2) Extensions to the WTW 24-MTC** - provides additional time beyond the WTW 24-MTC in up to six month increments to complete an activity or education program, as indicated above, when the extension to the WTW 24-MTC criteria is met; and

**3) CalWORKs Federal Standards** - hourly requirements, based on Temporary Assistance for Needy Families (TANF) participation requirements, provides an additional 12 months of education to the WTW 24-MTC and any extension(s) of the clock for clients who have exhausted their WTW 24-MTC.

**4) Combining Education and Work Activities** - allows the client to save their time limited education activities for a later time, if desired, or work part-time while still attending their education activity.

The aforementioned program components assume that the client is engaged in a full-time educational activity. Clients may also engage in part-time education with other activities to meet federal standards.

## **WTW 24-MTC**

The WTW 24-MTC provides clients the opportunity to engage in full-time education, or part-time education while also engaged in other activities, for up to 24 months without restriction. While using the WTW 24-MTC, clients must meet hourly participation requirements called CalWORKs minimum standards provided in MPP Section 42-711, and may engage in job skills training directly related to employment, satisfactory attendance at a secondary school on a course leading to certificate of general education development, education directly related to employment, adult basic education, and/or vocational education activities, defined in MPP Section 42-716.1. Using the WTW 24-MTC in these activities, clients may pursue education to earn a high school diploma or equivalent, as well as postsecondary education leading to a professional certificate or degree from a two or four-year accredited institution.

To use the WTW 24-MTC, clients must have a WTW plan developed to meet CalWORKs minimum standards, specified in MPP Section 42-711. The WTW plan must align with CalWORKs WTW program's objectives and, the client's assessment results and individual goals.

## **Extensions to the WTW 24-MTC**

When a client reaches the end of the WTW 24-MTC, CWDs may grant an extension(s) to the clock if a qualifying condition provided in MPP Section 42-708.7 is met. Of those criteria, MPP Section 42-708.721(a)(3) provides an extension for clients requiring additional time to complete an education program:

*The recipient has achieved satisfactory progress in an educational or treatment program, including adult basic education, vocational education, or a self-initiated program that has a known graduation, transfer, or completion date that would meaningfully increase the likelihood of his or her employment.*

Note: For purposes of this paragraph, a high school education or its equivalent is presumed to meaningfully increase the likelihood of employment (ACL18-41).

Further, ACL 18-41 provides an additional extension following passage of AB 818 (Statutes of 2017) for clients who have earned a high school diploma or the equivalent, and are in a postsecondary education program:

*The recipient obtained his or her high school diploma or its equivalent while participating in activities described in paragraph (1) of subdivision (a) of Section 11322.85, and an additional period of time to complete an educational program or other activity described in paragraph (1) of subdivision (a) of Section 11322.85 in which he or she is currently participating would meaningfully increase the likelihood of his or her employment.*

Clients may request extensions to their WTW 24-MTC, and CWD shall grant them in up to six-month increments, contingent on supporting documentation, and provided that the client has time remaining in their 48-month time limit. There is no limit to the number of extensions a client may receive. While in an extension, clients must continue to meet CalWORKs minimum standards unless the client qualifies for an exemption pursuant to MPP Section 42-712.41 through Section 42-712.49 or has good cause pursuant to MPP Section 42-713.2. The CWD must require supporting documentation, such as proof of enrollment or satisfactory progress, to grant the extension pursuant to MPP Section 42-708.732.

The number of extensions available to each CWD for the July 2018 to December 2018 timeframe can be found in ACL No. 18-95. The tabulation of extension targets for months January 2019 to June 2019 is set for release under separate cover. No county has currently exhausted their available extensions to the WTW 24-MTC, described in MPP Section 42-708.712.

### **CalWORKs Federal Standards**

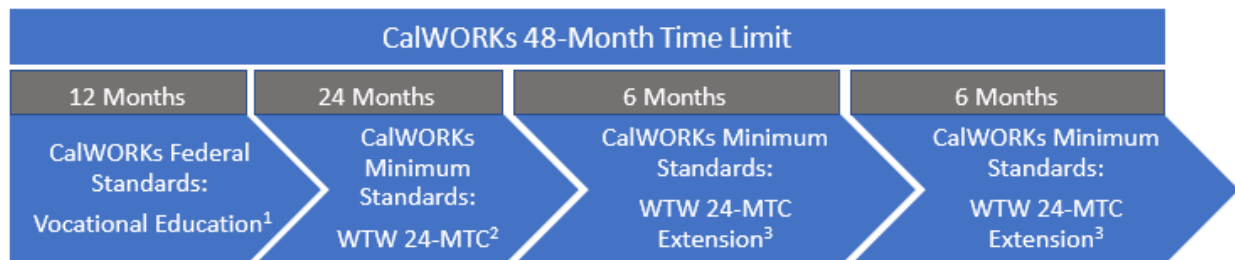
CalWORKs federal standards, provided in MPP Section 42-709, align with TANF participation requirements. The WTW 24-MTC does not tick for months clients are meeting CalWORKs federal standards. Clients must meet CalWORKs federal standards after exhausting both their WTW 24-MTC and any extension(s) to the clock.

CalWORKs federal standard participation requirements are identical to TANF requirements in overall and core hourly requirements, allowable activities, and activity time limits. Like the TANF requirements, CalWORKs federal standards provide 12 months of vocational education and training (counted as a core activity), defined in MPP Section 42-716.1(m), for clients to pursue education.

### Combining Education and Work Activities

Clients may meet CalWORKs federal standards while pursuing their education as non-core job skills training, satisfactory progress in a secondary school or a general education development course, or education directly related to employment (clients without a high school diploma) activities, defined in MPP Section 42-716. During this time, the client must also participate in other core work activities, such as employment, work study, or on-the-job training. Combining education and work activities while meeting CalWORKs federal standards in this manner can allow clients to save time on their 24-MTC and 12-month lifetime maximum in vocational education and training while pursuing their education or continue their education after these time limits are exhausted.

### Example Timeline for WTW Clients in 48 Months of Education



<sup>1</sup> Vocational Education is a federally countable activity and is addressed in more detail under MPP Section 42-709.315.

<sup>2</sup> The Welfare-to-Work 24-Month Time Clock (WTW 24-MTC) is the period of time through which clients may engage in activities to meet CalWORKs minimum standards and is addressed in more detail under MPP Section 42-708.

<sup>3</sup> WTW 24-MTC Extensions allow clients to continue activities that meet CalWORKs minimum standards under the WTW 24-MTC and is addressed in more detail under MPP Section 42-708.7.

Note: The components comprising this timeline may occur in a different order. The time limits attributed to this timeline need not be used in its entirety and may be used in distinct increments. See the attached diagram for information on how these segments relate to the overall CalWORKs WTW flow.

**Examples of 48 Months of Education While Receiving CalWORKs Assistance**

**Example #1**

Monica enters CalWORKs with her 8-year old son. During appraisal, Monica informs her caseworker that she wants to pursue her education and earn a degree in financial accounting.

*One year of CalWORKs Federal Standards Vocational Education*

In January 2017, during assessment, Monica and her caseworker create a WTW plan assigning her to attend a college financial accounting program using her lifetime maximum 12 months of vocational education under CalWORKs federal standards.

*Two years of a WTW 24-MTC Education Activity*

In January 2018, Monica's caseworker informs her that her lifetime maximum 12 months of vocational education has ended, but she can continue to pursue her education using the WTW 24-MTC, meeting CalWORKs minimum standards. Monica's new WTW plan allows her to continue attending her financial accounting program while using the WTW 24-MTC, where she will participate in 30 average hours per week (based on her Assistance Unit [AU] composition).

*Two Six-Month Extensions to the WTW 24-MTC*

In January 2020, Monica has exhausted her WTW 24-MTC while attending her financial accounting program and provides verification to her caseworker that she is making satisfactory progress in her program and has an anticipated graduation date of December 2020.

Monica's caseworker grants her an extension to the WTW 24-MTC for the maximum 6 months, in accordance with MPP Section 42-708.735, until June 2020. Upon confirmation of Monica's continued progress, a second extension for an additional 6 months is granted to December 2020.

In December 2020, Monica receives her degree and ends her time on aid.

**Example #2**

Nicole is a mother of a 2-year-old daughter, and lives with her husband, Jim, who is on SSI. Nicole wants to pursue a degree in liberal studies to become a school teacher. Due to receiving SSI, Jim is not an aided adult in the family's AU and is therefore not required to participate in WTW activities.

*One Year of a WTW 24-MTC Education Activity*

In January 2018, Nicole and her county worker develop a WTW plan in which she is scheduled to attend community college to complete lower division courses. The WTW plan specifies Nicole will meet CalWORKs minimum standards, requiring 20 average hours per week (based on her AU composition), and use her WTW 24-MTC.

*One Year of CalWORKs Federal Standards Vocational Education*

In January 2019, Nicole is able to take on more units of education toward her degree. Nicole enters into a revised WTW plan meeting CalWORKs federal standards using her 12 months lifetime maximum vocational education as a core activity and indicating that Nicole will participate for a total of 30 hours per week in the vocational activity. Note: Due to the presence of another adult in the home, Nicole must participate for 30 total hours per week, 20 of which are core hours, to meet CalWORKs federal standards, in accordance with MPP Section 42-709.231(d)(1).

*One year of a WTW 24-MTC Education Activity*

In January 2020, after successfully completing all needed transferable courses, Nicole is accepted to a university where she wants to continue her education. After previously using 12 months of her WTW 24-MTC, Nicole enters into a new WTW plan to continue her education at the university using the remaining months on her WTW 24-MTC.

*Two Six-Month Extensions to the WTW 24-MTC*

By January 2021, Nicole's first year at the university is successful, and she is now just one year away from her degree. Having used all 12 months of allowable core vocational education under CalWORKs federal standards, and upon reaching the end of her WTW 24-MTC, Nicole requests an extension to complete her education program. With a known graduation date in December 2021 and documentation of satisfactory progress, the county approves an extension for the maximum six months available, in accordance with MPP Section 42-708.735.



In June 2021, Nicole requests, and the county grants, an additional extension through December 2021 to complete her education program. Nicole then graduates with her degree in December 2021 and ends her time on aid.

### **Example #3**

Miles is the single parent of a 6-year old daughter. He enters the CalWORKs program and informs his caseworker that he wishes to earn a vocational certificate in metal working. During appraisal, Miles shares that he does not have a high school diploma or equivalent.

#### *One year of WTW 24-MTC Activity*

In January 2018, Miles and his caseworker agree to a to WTW plan to participate in a high school equivalency program. Based on Miles' AU composition, he is required to participate for 30 hours to meet CalWORKs minimum standards while using his WTW 24-MTC. Please note that, in accordance with Assembly Bill (AB) 1604, Chapter 303, Statutes of 2017, a client pursuing their high school diploma or equivalent may be referred to, but cannot be required to, attend assessment prior to beginning their course of study.

#### *One year of CalWORKs Federal Standards Vocational Education*

In December 2018, Miles earns his high school diploma or equivalent and meets with his caseworker to develop a new WTW plan to continue his education toward a metal working certificate. Miles' new WTW plan assigns him to 30 hours per week in a community college metal working program, using his lifetime maximum 12 months lifetime maximum of vocational education meeting CalWORKs federal standards.

#### *One year of WTW 24-MTC Education Activity*

In December 2019, having used all his lifetime maximum 12 months of vocational education under CalWORKs federal standards, Miles and his caseworker develop a new WTW plan using the remaining months on his WTW 24-MTC to pursue his metal working certificate.

#### *One Six-Month Extension to the WTW 24-MTC*

By December 2020, Miles still has twelve months left before graduating with his certificate in June 2021. With a known graduation date and documentation of satisfactory progress in the program, Miles is granted a 6-month extension to continue his education.

*Six Months of CalWORKs Federal Standards Combining Education and Work*

Six months later, in June 2021, Miles is hired as an apprentice at a local metal shop while he finishes his certification program. As a result, Miles meets CalWORKs federal standards by combining his education hours with 20 core hours per week on-the-job training at the metal shop for next six months. In December 2021, Miles receives his metal working certification and is hired on full-time at the metal shop, ending his time on aid.

**Supportive Services**

Supportive services support the clients in their efforts to pursue their educational goal and remove barriers from the clients' move toward self-sufficiency and may include:

- Child care
- Diaper assistance for clients with young children
- Transportation
- Ancillary services:
  - tools
  - books, and/or
  - supplies.

CWDs are reminded that, per MPP Section 42-750.11, supportive services necessary for participation in assigned program activities must be available to every client, including those participating voluntarily, in face-to-face and/or in distance learning. If necessary support services are not available, then the client shall have good cause for not participating under MPP Section 42-713.21. Supportive services must also be available during the time the client spends doing homework, whether this is supervised or unsupervised, as prescribed in MPP Section 42-716.611, for both in-person and distance education activities.

Pursuant to MPP Section 42-750.21, CWDs must make advance payments to the client for supportive services as necessary. CDSS strongly encourages CWDs to make advance payments prior to the beginning of each academic term. CWDs may use the following chart to help guide the provision of advance payments for each academic term. Please note that the cost of books and supplies may vary by campus even within the same system.

**Estimated Annual Cost of Books and Supplies by Institution**

	<b>CCC<sup>1</sup></b>	<b>CSU<sup>1, 2</sup></b>	<b>UC<sup>1, 3</sup></b>	<b>Private<sup>1</sup></b>
Books and Supplies	\$1792.00	\$2000.00	\$1200.00	\$1200.00

<sup>1</sup> For estimates by campus, please contact the accredited institution directly.

<sup>2</sup> For estimates by campus, please visit the CSU's [Campus Cost of Attendance](#).

<sup>3</sup> For estimates by campus, please visit the UC's page on [Cost of Attendance](#).

**Contact**

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

Sincerely,

***Original Document Signed By:***

KIM JOHNSON  
Director  
California Department of Social Services  
Attachment

# CALWORKS WELFARE-TO-WORK FLOW/PARTICIPATION REQUIREMENTS (EDUCATION-FOCUSED CLIENT)

## CALWORKS APPLICATION & APPROVAL

### WTW ORIENTATION

Provide information about welfare-to-work (WTW), activities, supportive services, and participation requirements.

### WTW APPRAISAL

Identify strengths and conditions which may pose a barrier to employment, in order to determine the next appropriate WTW step for the participant to take in WTW.

**FAMILY  
STABILIZATION/  
OTHER IMMEDIATE  
BARRIER REMOVAL**

**WELFARE-TO-WORK  
EXEMPTION**

**JOB CLUB/  
JOB SEARCH**

**ASSESSMENT\* &  
EDUCATION**

### WTW Plan Development for Education Focused Client

Education/Training-Related Activities Available to Participants	Hourly Requirement: WTW 24-Month Time Clock (Approximately 1-24 months)	Hourly Requirement: CalWORKs Federal Standards (Remaining 24 months on aid)
<ul style="list-style-type: none"> <li><b>Adult Basic Education</b> (includes English as a Second Language, high school proficiency, and others)</li> <li><b>Work Study**</b></li> <li><b>Vocational Education**</b> (may be counted as core for up to 12-months)</li> <li><b>On-the-job training**</b></li> <li><b>Job skills training</b></li> <li><b>Education directly related to employment</b> (includes High School/General Education Development (GED), Community College, Four-year colleges)</li> </ul>	<p><b>MPP Section 42-709.21</b></p> <p>Single Adult w/Child under six <b>20 Hours/Week</b></p> <p>Single Adult w/child six or older <b>30 Hours/Week</b></p> <p>Two-parent Household <b>35 Hours/Week</b></p> <p><b>(No Core Requirements are required during this time)</b></p>	<p><b>MPP Section 42-709.21</b></p> <p>Single Adult w/ child under six <b>20 Hours/Week</b> (20 Core)</p> <p>Single Adult w/ child six or older <b>30 Hours/Week</b> (20 Core/10 Non-Core)</p> <p>Two-parent Household <b>35 Hours/Week</b> (30 Core/5 Non-Core)</p>

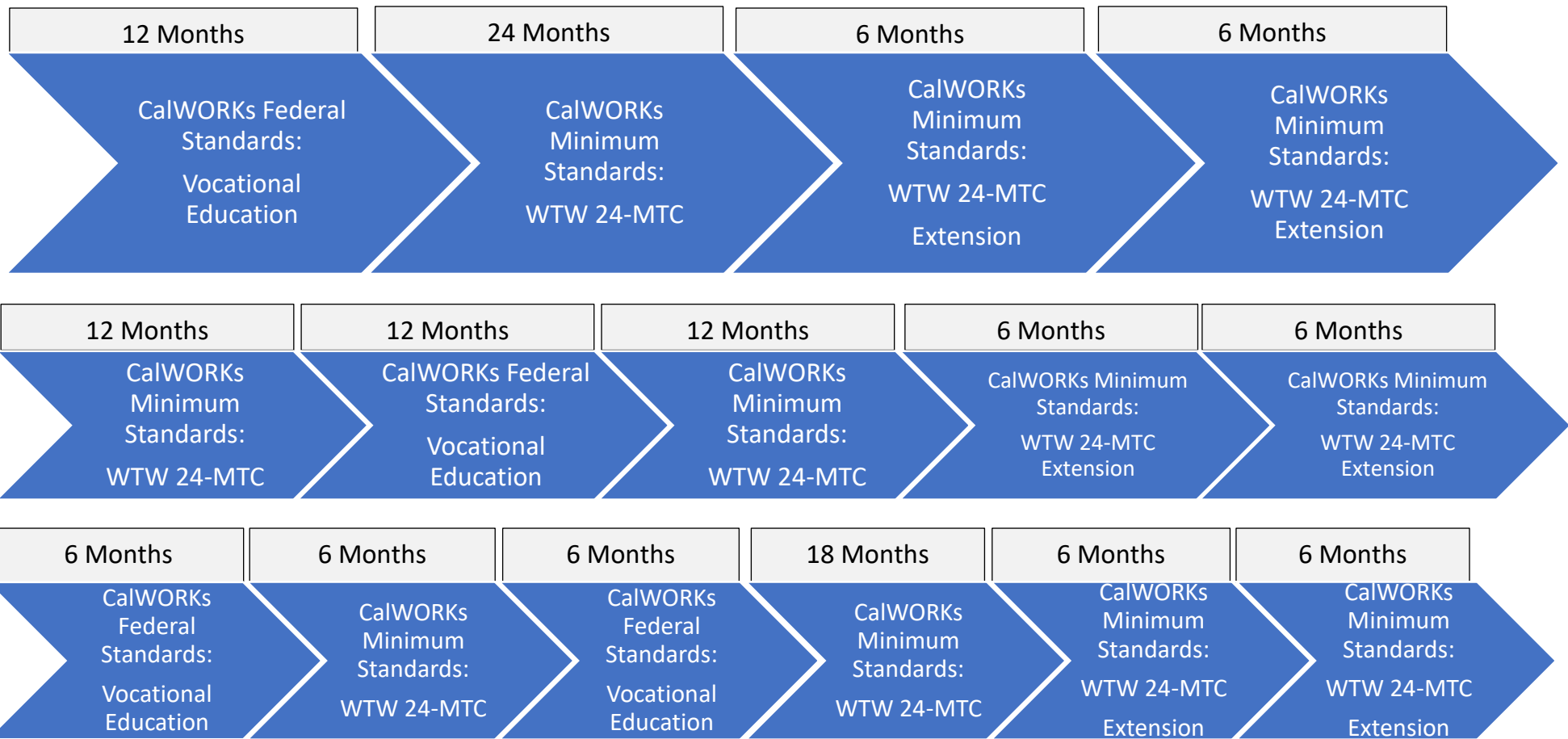
\* Assessment is not required for clients assigned to a Self-Initiated Program (SIP) or Secondary School/GED.

\*\*Indicates activities that may be counted as core.

#### Example of Potential Education Focused Client (per year in CalWORKs):

- YEAR 1:** Pursues education by utilizing the federal 12-month vocational education core option.
- YEAR 2/3:** Utilizes flexibility of WTW 24-Month Time Clock by doing solely education as an activity (i.e. community college courses or certificate program).
- YEAR 4:** Continues education, though utilizes work study or other employment related option in order to meet core hourly requirements or receives extension of 24-MTC if they meet eligibility criteria.

### Examples of Potential Education Focused Client (per year in CalWORKs):



Vocational Education is a federally countable activity and is addressed in more detail under MPP Section 42-709.315.

The Welfare-to-Work 24-Month Time Clock (WTW 24-MTC) is the period of time through which clients may engage in activities to meet CalWORKs minimum standards and is addressed in more detail under MPP Section 42-708.

WTW 24-MTC Extensions allow clients to continue activities that meet CalWORKs minimum standards under the WTW 24-MTC and is addressed in more detail under MPP Section 42-708.7

Note: The components comprising these timelines may occur in a different order. The time limits attributed to these timelines need not be used in its entirety and may be used in distinct increments. These diagrams are not intended to be an exhausted list of examples.