

November 17, 2020

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

**EXECUTIVE SUMMARY**

**ALL COUNTY LETTER NO. 20-125**

The purpose of this All County Letter is to provide County Welfare Departments, state partners, and third-party partners that offer CalFresh Employment and Training (E&T) services guidance on the provision of equipment and supportive services, especially in response to the coronavirus pandemic emergency. This guidance is specific to CalFresh E&T equipment purchased to support E&T participants such as laptops and mobile devices (with some restrictions) and participant reimbursements, known as supportive services in California, including but not limited to, the cost of internet or telephone service, and personal protective equipment (PPE) when required for an individual to successfully participate in CalFresh E&T.



KIM JOHNSON  
DIRECTOR

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**DEPARTMENT OF SOCIAL SERVICES**  
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GAVIN NEWSOM  
GOVERNOR

November 17, 2020

ALL COUNTY LETTER NO. 20-125

TO: ALL COUNTY WELFARE DIRECTORS  
ALL CALFRESH PROGRAM SPECIALISTS

SUBJECT: CALFRESH EMPLOYMENT & TRAINING (E&T) SUPPORTIVE  
SERVICES AND EQUIPMENT

REFERENCE: [ASSEMBLY BILL \(AB\) 1892 \(CHAPTER 381, STATUTES OF 2018\); 7 CFR 273.7 \(d\)\(3\); WELFARE AND INSTITUTIONS CODES \(W&IC\) SECTION 18926.5 and 18926.7; FOOD AND NUTRITION SERVICES \(FNS\) SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM \(SNAP\) QUESTION AND ANSWERS COVID-19 SET #4 MEMO; 2 CFR §200.313 EQUIPMENT](#)

The purpose of this All County Letter (ACL) is to provide County Welfare Departments (CWDs), state partners, and third-party partners that offer CalFresh Employment and Training (E&T) services guidance on the provision of equipment and supportive services, especially in response to the coronavirus pandemic emergency. This guidance is specific to CalFresh E&T equipment purchased to support E&T participants such as laptops and mobile electronic devices (with some restrictions) and participant reimbursements, known as supportive services in California, including but not limited to, the cost of internet or telephone service, and personal protective equipment (PPE) when required for an individual to successfully participate in CalFresh E&T.

This guidance reflects state policy as required by Assembly Bill (AB) 1892 (Chapter 381, Statutes of 2018) and federal policy as outlined by the US Department of Agriculture, Food and Nutrition Service (FNS) in a memo dated April 13, 2020 entitled "[Supplemental Nutrition Assistance Program – Questions and Answers, COVID-19, Set #4.](#)"

## **Background**

Existing law establishes that counties, state partners and third-party partners that choose to offer CalFresh E&T are required to demonstrate effective administration of allowable E&T components as part of their approved CalFresh E&T Annual Plan. This includes, but is not limited to, the provision of supportive services for individuals to successfully participate in CalFresh E&T.

Welfare and Institutions Code ([W&IC section 18926.5](#)) also specifies that the California Department of Social Services (CDSS) must issue guidance to counties participating in CalFresh E&T regarding the provision of supportive services, including but not limited to, reimbursement of the cost of internet or telephone service that is required for an individual to participate in CalFresh E&T.

On March 4, 2020 the Governor of California declared a State of Emergency due to the coronavirus pandemic emergency; a statewide “stay-at-home” order was issued on March 19, 2020 and remains in effect until further notice. This has resulted in significant changes to the operation of CalFresh E&T services statewide, including an increased need for supportive services to facilitate service provision considering recent public health orders and recommendations, as well as socially distanced and remote participation in CalFresh E&T.

## **CalFresh E&T Funding**

There are three types of federal funding available to states under the Supplemental Nutrition Assistance Program (SNAP) E&T Program: 100 Percent Federal Funds, 50 Percent Federal Reimbursement for Administrative Costs, and 50 Percent Reimbursement for Supportive Services. The FNS allocates 100 Percent Federal Funds based on the number of work registrants reported within each State. Allocations of these funds are distributed to participating counties based on the CalFresh Non-Assistance caseload.

### Types of CalFresh E&T Funding

- **100 Percent Federal Funds**  
The FNS provides the state an allocation of 100 percent federal funds, which the CDSS distributes to counties for CalFresh E&T program administrative costs. Administrative costs include the planning, implementation and operation of a county’s E&T program.
- **50 Percent Federal Reimbursement for Administrative Costs**  
The FNS provides states a target allocation of 50 percent federal reimbursement

funds for administrative costs above and beyond those funded with 100 percent federal funds. The state, counties, and/or partners that incur allowable costs paid for using non-federal funds are eligible to receive 50 percent federal reimbursement.

- **50 Percent Federal Reimbursement for Supportive Services**  
The FNS provides states a target allocation of 50 percent federal reimbursement funds for supportive services. CWDs and/or partners that incur allowable costs for supportive services paid for with non-federal funds are eligible to receive 50 percent federal reimbursement.

### **Equipment for use by E&T Participants**

CWDs and state partners may purchase necessary equipment to be utilized by CalFresh E&T participants through funds categorized as [100 Percent Federal Funds and 50 Percent Federal Reimbursement Funds for Administrative Costs](#). Although this equipment will support the success of the CalFresh E&T participant in the enrolled component these equipment purchases are not categorized as participant supportive services. Equipment purchased by the CWD, state partner or third-party partner may include laptops, cellular phones, and other computer equipment to be loaned to participants enrolled in components that require remote access, such as distance learning. Equipment loaned to participants must be tracked by CWDs, state partners or third-party partners in accordance with federal regulations [2 CRF §200.313](#) for equipment purchase, distribution and disposition. The FNS will reimburse 50 percent of costs incurred for allowable equipment expenses that are reasonable, necessary and directly related to participation in the CalFresh E&T program.

### **CalFresh E&T Supportive Services**

Supportive services are intended to assist participants with overcoming barriers that prevent participation in CalFresh E&T. Providers of CalFresh E&T services are required to pay directly or reimburse CalFresh E&T participants for expenses that are reasonable, necessary, and directly related to participation in CalFresh E&T upon presentation of appropriate documentation. The FNS will reimburse 50 percent of costs incurred for allowable supportive service expenses.

Counties and state partners must include information about supportive services in their CalFresh E&T Annual Plan. Plans must specify the types of supportive services being offered and whether supportive services are treated as a reimbursement or an allowance. Information on how supportive services will be administered and tracked is also required. The CDSS can provide technical assistance regarding the types of supportive services that are allowable and eligible for reimbursement, though ultimately

each county and state partner is to determine what is reasonable, necessary and directly related to participation in their CalFresh E&T program.

As listed in [7 CFR 273.7\(d\)\(4\)](#), reimbursable supportive services may include, but are not limited to, dependent care costs, transportation, and other worktraining or education related expenses known as ancillary costs. Examples include uniforms, personal safety items, other necessary equipment, books or training manuals, and internet and telephone services. All services must be directly related to an individual's participation in CalFresh E&T in order to be eligible for reimbursement. When documenting supportive services, a county or partner must track the component(s) in which a participant is enrolled along with keeping records of transportation logs and/or copies of receipts for all supportive services issued and justification for each issuance.

#### Dependent Care

Dependent care necessary for an individual to participate in CalFresh E&T (up to the actual cost of dependent care, or the applicable payment rates for childcare, whichever is lowest) is eligible for 50 percent reimbursement. Dependent care beyond what is required for participation in CalFresh E&T is not eligible for 50 percent reimbursement. Dependent care may be provided for all dependents requiring care under the age of 13 unless the dependent is physically and/or mentally incapable of caring for himself or herself or is under court supervision. A CalFresh E&T participant is not entitled to the dependent care supportive service if a member of the CalFresh E&T participant's SNAP household provides the dependent care services ([7 CFR 273.7](#)).

Verification of the cost and the participant's need for dependent care is required prior to the issuance of the supportive service. The verification must include name and address of dependent care provider, cost, and the hours of service. The verification must also demonstrate that the supportive service issued was necessary, reasonable and directly related to participation in CalFresh E&T.

#### Transportation

Transportation supportive services (gas, transit passes) necessary for an individual to participate in CalFresh E&T are eligible for 50 percent reimbursement. Verification of the cost and the participant's need for transportation is required prior to the issuance of the supportive service. The verification must demonstrate that the supportive service issued was necessary, reasonable and directly related to participation in CalFresh E&T.

#### Training Supplies

Supplies such as books, tools, equipment and uniforms that are necessary for an individual to participate in CalFresh E&T are eligible for 50 percent reimbursement. Verification of the cost and the participant's need for training supplies is required prior to the issuance of the supportive service. The verification must demonstrate that the

supportive service issued was necessary, reasonable and directly related to participation in CalFresh E&T.

#### Personal Protective Equipment

Personal protective equipment, or PPE, necessary to engage in a CalFresh E&T component, when not provided by an employer, is eligible for 50 percent reimbursement. This may include, but is not limited to, PPE, hard hats, and non-slip shoes. Supportive services may also include appropriate precautionary items, such as cloth face coverings and protective gloves, for use during the pandemic emergency, consistent with public health guidance. Verification of the cost and the participant's need for PPE is required prior to the issuance of the supportive service. The verification must demonstrate that the supportive service issued was necessary, reasonable and directly related to participation in CalFresh E&T.

#### Internet Services

Internet services necessary for an individual to participate in CalFresh E&T are eligible for 50 percent reimbursement. For example, a participant may be enrolled in an online training course through the CalFresh E&T education component that requires use of the internet. In this situation, internet service costs are an allowable supportive service. Verification of the cost and the participant's need for internet service is required prior to the issuance of the supportive service. The verification must demonstrate that the supportive service issued was necessary, reasonable and directly related to participation in CalFresh E&T. It is anticipated that supportive services needed to support remote learning and other CalFresh E&T components will increase during the pandemic emergency.

#### Telephone Services

Telephone services that are necessary for an individual to participate in CalFresh E&T are eligible for 50 percent reimbursement. For example, a participant may be required to communicate with potential employers via telephone in order to participate in the CalFresh E&T supervised job search component. Verification of the cost and the participant's need for telephone service is required prior to the issuance of the supportive service. The verification must demonstrate that the supportive service issued was necessary, reasonable and directly related to participation in CalFresh E&T.

The use of existing telephone service resources is highly encouraged. The [California Lifeline Program](#) is a state program that provides discounted home phone and cell phone services to eligible households and may be leveraged for CalFresh E&T program participants.

Claiming instructions for CalFresh E&T supportive services and for planned purchases of computer equipment will be provided in a forthcoming CFL.

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If you have any questions regarding this ACL, please contact the CalFresh Policy and Employment Bureau at [CalFreshEandT@dss.ca.gov](mailto:CalFreshEandT@dss.ca.gov).

Sincerely,

***Original Document Signed By:***

JENNIFER HERNANDEZ, Deputy Director  
Family Engagement and Empowerment Division