

July 26, 2020

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

EXECUTIVE SUMMARY

ALL COUNTY LETTER NO. 20-34

The purpose of this All County Letter is to notify County Welfare Departments that local Puente Project programs must now be individually approved by the California Department of Social Services as a program to increase employability in order for participation in the program to qualify a student for an exemption from the student eligibility rule.



KIM JOHNSON
DIRECTOR

STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
744 P Street • Sacramento, CA 95814 • www.cdss.ca.gov



GAVIN NEWSOM
GOVERNOR

July 26, 2020

ALL COUNTY LETTER (ACL) NO. 20-34

TO: ALL COUNTY WELFARE DIRECTORS
ALL CALFRESH PROGRAM SPECIALISTS
ALL CALWORKs PROGRAM SPECIALISTS
ALL CONSORTIA MANAGERS
ALL QUALITY CONTROL COORDINATORS

SUBJECT: CALFRESH STUDENT ELIGIBILITY: PUENTE PROJECT

REFERENCE: [TITLE 7 CODE OF REGULATIONS \(CFR\) 273.5](#); [MANUAL OF POLICY AND PROCEDURES \(MPP\) 63-406](#); [WELFARE AND INSTITUTIONS CODE \(W&IC\) SECTION 18901.11\(b\)](#); [ALL COUNTY LETTER \(ACL\) 15-70, 17-05, 18-27, 20-08](#); [ALL COUNTY INFORMATION NOTICE \(ACIN\) I-89-15](#)

The purpose of this All County Letter (ACL) is to notify County Welfare Departments (CWDs) that effective with the release of this letter, local Puente Project programs must be individually approved by the California Department of Social Services (CDSS) as a program to increase employability in order for participation in the program to qualify a student for an exemption from the student eligibility rule.

The Puente Project will be removed from the list of approved statewide programs to increase employability issued via [ACL No. 17-05](#) dated February 14, 2017. As a result of the Puente Project being removed from the list of approved state programs to increase employability, local Puente Project programs that offer a component equivalent to an Employment and Training (E&T) component must be approved by CDSS on a case-by-case basis.

Background

[W&IC Section 18901.11\(b\)](#) mandated that the CDSS, in consultation with representatives of the California Community Colleges Chancellor's Office, the California State University Office of the Chancellor, the Office of the President: University of California, the California Workforce Development Board, county human service

agencies, and advocates for students and clients, establish a protocol to identify all potential exemptions to the student eligibility rule described in [7 CFR Section 273.5\(a\)](#). Furthermore, it required that this consultation take place, to the extent possible, through the existing student eligibility workgroup that was established to improve CalFresh access among students in order to reduce the high rate of hunger and food insecurity occurring on college campuses.

As a result of the workgroup's efforts, the CDSS released [ACL No. 15-70](#), dated September 17, 2015, which established that participation in Workforce Innovation and Opportunity Act and Extended Opportunity Programs and Services programs qualified a student for an exemption from the student eligibility rule. [ACIN No. I-89-15](#), dated December 31, 2015, provided additional policy guidance regarding exemptions from the student eligibility rule and instructed CWDs on how to verify these exemptions. Additionally, [ACL No. 17-05](#) and [ACL No. 18-27](#), dated April 2, 2018, offer policy guidance specific to programs to increase employability.

[W&IC Section 18901.11\(c\)](#) requires the CDSS to regularly update the list of pre-approved programs identified by the workgroup in order to ensure continued compliance with the requirements of [7 CFR Section 273.5](#).

State Programs that Increase Employability

In accordance with [ACL No.17-05](#), a student meets the criteria for an exemption from the CalFresh student eligibility rule if the student is participating in a program to increase the student's employability. This includes programs for students with low-income that are operated by a state or local government where one or more of the components of the program are equivalent to a CalFresh E&T component.

In accordance with [ACL No. 18-27](#), a program to increase employability must support a student in gaining the skills, training, work, or experience that will increase their ability to obtain regular employment. The CDSS' approval of a program as a "program to increase employability" is based on an assessment of whether the local program has one or more components equivalent to a CalFresh E&T Program component, such as the following:

- job retention,
- job search,
- job search training,
- work experience,
- workfare,
- vocational training,
- self-employment training,
- on-the-job training, or
- education.

Program activities must have a direct link to employment and move the student promptly into employment. Lastly, drop-in centers that offer services on an as needed basis are not considered programs to increase employability under this definition.

Puente Project

The [ACL No. 17-05](#) states that all Puente Project programs statewide are considered programs to increase employability and, as such, qualify the participating student for an exemption from the CalFresh student eligibility rule.

However, after further research, and in consultation with the student eligibility workgroup, CDSS has determined that not all Puente Project programs statewide meet the definition of a program to increase employability, as described above. This is because not all local Puente Project programs offer one or more components equivalent to an E&T component.

With the release of this letter, the approval provided in [ACL No. 17-05](#) is no longer applicable. However, local Puente Project programs may be approved by CDSS on a case-by-case basis. To be approved, a local Puente Project program must provide one or more components that is equivalent to an E&T component.

In addition, [ACL No. 20-08](#), dated February 12, 2020 states that if a student resides in one county, but commutes to another county where the approved program is located, the student meets the criteria for an exemption from the student eligibility rule.

The template request form for program approval can be found on the [CalFresh Resource Center: Policy Guidance](#) webpage under the Student Resources section titled, [“Request for Approval of Local Education Program to Increase Employability.”](#) In accordance with [ACL No. 18-27](#), the template request form is intended to guide CWDs and/or other stakeholders in providing CDSS the information necessary to approve a local program as a program to increase employability.

Ongoing Households with a Student Participating in the Puente Project

Ongoing CalFresh households that include a student exempt from the student eligibility rule based on their participation in a Puente Project program must be reassessed for an exemption from the student eligibility rule as soon as possible and no later than the household's next periodic report (i.e. SAR 7) or recertification. At the time the student is reassessed for an exemption, CWDs must ensure that participation in the Puente Project program no longer qualifies the student for an exemption from the student eligibility rule unless the local Puente Project program has been approved by CDSS as a program to increase employability.

If you have any questions regarding this letter, please contact the CalFresh Policy Bureau at (916) 651-8047.

Sincerely,

Original Document Signed By:

JENNIFER HERNANDEZ
Deputy Director
Family Engagement and Empowerment Division