

April 1, 2022

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

EXECUTIVE SUMMARY

ALL COUNTY LETTER NO. 22-26

The purpose of this All County Letter (ACL) is to inform County Welfare Departments (CWDs) of upcoming changes to the “Non-Assistance CalFresh Work Registrants, Able-Bodied Adults Without Dependents (ABAWDs), and Employment and Training (E&T) Program Quarterly Statistical Report” (STAT 47). These changes are a result of the codification of the Agricultural Improvement Act of 2018 (P.L. 115-334), also known as the 2018 Farm Bill, and implementation by the United States Department of Agriculture, Food and Nutrition Service (FNS) via release of the Final Rule on January 4, 2021. These changes are effective upon release of the revised STAT 47, corresponding instructions, and automation into the eligibility system.



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

April 1, 2022

ALL COUNTY LETTER NO. 22-26

TO: ALL COUNTY WELFARE DIRECTORS
ALL COUNTY CALFRESH SPECIALISTS
ALL CONSORTIA REPRESENTATIVES
ALL QUALITY CONTROL COORDINATORS

SUBJECT: CHANGES TO THE “NON-ASSISTANCE CALFRESH WORK REGISTRANTS, ABLE-BODIED ADULTS WITHOUT DEPENDENTS AND CALFRESH EMPLOYMENT AND TRAINING PROGRAM QUARTERLY STATISTICAL REPORT” (STAT 47)

REFERENCE: [PUBLIC LAW 115-334, AGRICULTURAL IMPROVEMENT ACT OF 2018](#); [FINAL RULE, EMPLOYMENT AND TRAINING \(E&T\) OPPORTUNITIES IN THE SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM \(SNAP\)](#); [ALL COUNTY LETTER \(ACL\) NO. 21-48](#); [TITLE 7 CODE OF FEDERAL REGULATIONS \(CFR\) 273.24\(a\)\(3\)\(iii\)](#); [7 CFR 273.7\(e\)\(2\)](#); [ACL NO. 19-93](#); [7 CFR 273.7\(c\)\(11\)\(iii\)](#); [SNAP CLARIFICATION OF E&T OUTCOME REPORTING REQUIREMENTS QUESTIONS & ANSWERS \(Q&A\) PART II, #8](#); [7 CFR 273.7\(c\)\(17\)\(i\)-\(iii\)](#); [7 CFR 273.7\(e\)\(2\)\(i\)](#); [7 CFR 273.7\(e\)\(2\)\(vi\)](#); [7 CFR 273.7\(e\)\(2\)\(iv\)](#)

The purpose of this All County Letter (ACL) is to inform County Welfare Departments (CWDs) of upcoming changes to the “Non-Assistance CalFresh Work Registrants, Able-Bodied Adults Without Dependents (ABAWDs), and Employment and Training (E&T) Program Quarterly Statistical Report” (STAT 47). These changes are a result of the codification of the [Agricultural Improvement Act of 2018 \(P.L. 115-334\)](#), also known as the 2018 Farm Bill, and implementation by the United States Department of Agriculture, Food and Nutrition Service (FNS) via release of the [Final Rule](#) on January 4, 2021. These changes are effective upon release of the revised STAT 47, corresponding instructions, and automation into the eligibility system.

BACKGROUND

FNS published the [Final Rule, E&T Opportunities in the Supplemental Nutrition Program \(SNAP\)](#), implementing several programmatic changes made by the [2018 Farm Bill](#), on January 4, 2021. Such changes affect the following areas:

- Qualifying CalFresh E&T components and activities that meet the ABAWD work requirement;
- CalFresh E&T work experience component definition; and
- Reporting requirements.

In order to collect the necessary data required by FNS and comply with recently codified federal regulations, the STAT 47 will be revised. Implementation of the revised STAT 47 will be effective upon the completion of automation in the California Statewide Automated Welfare System (CalSAWS). Counties currently using the California Work Opportunity and Responsibility to Kids Information Network (CalWIN) will be required to implement the revised STAT 47 upon their go-live dates in CalSAWS.

CHANGES TO THE ABAWD TIME LIMIT POLICY

The Final Rule established several changes to the ABAWD time limit policy, including changes to discretionary exemptions and expansion of allowable activities to satisfy the ABAWD work requirement. Information regarding these changes was provided in [ACL No. 21-48](#) issued on April 23, 2021. The revised STAT 47 will require CWDs to report the total number of discretionary exemptions used each quarter, the number of ABAWDs participating in qualifying E&T components, and the number of ABAWDs participating in non-qualifying E&T components.

New ABAWD Category
Total number of discretionary exemptions used during the quarter

QUALIFYING ACTIVITIES

In accordance with the Food and Nutrition Act of 2008, [Title 7 Code of Federal Regulations \(CFR\) 273.24\(a\)\(3\)\(iii\)](#), [7 CFR 273.7\(e\)\(2\)](#), and guidance previously issued in [ACL No. 19-93](#) on September 12, 2019, a supervised job search program is not a qualifying E&T activity under the participation requirements necessary to maintain CalFresh eligibility for ABAWDs. Job search offered as part of other CalFresh E&T components counts towards the ABAWD work requirement when the time spent comprises less than half of the total time spent in the component.

A job search program, supervised or otherwise, when operated under Title I of the Workforce Investment Opportunity Act (WIOA), under section 236 of the Trade Act, or a program of employment and training for veterans operated by the Department of Labor or the Department of Veterans Affairs, is considered a qualifying activity and counts toward the ABAWD work requirement.

Component Name	New Qualifying Component for ABAWDs
Supervised Job Search	ABAWD in qualifying component placements (WIOA and Veterans Programs)

CHANGES TO CALFRESH E&T COMPONENTS AND REPORTING REQUIREMENTS

In accordance with [7 CFR 273.7\(c\)\(11\)\(iii\)](#), the definition of a CalFresh E&T participant is a CalFresh applicant or recipient who engages in at least one part of an E&T program including orientation, assessment, case management, or a component. Therefore, all individuals who engage in any E&T activity, even if they do not engage in further component activities, are categorized as E&T participants and must be captured for reporting purposes. An individual who is referred to case management, assessment, or orientation, but fails to attend is not considered a CalFresh E&T participant for reporting purposes.

As outlined in [SNAP Clarification of E&T Outcome Reporting Requirements Questions & Answers \(Q&A\) Part II, #8](#), issued on May 2017, the definition “completion of participation” in CalFresh E&T for the measures in [7 CFR 273.7\(c\)\(17\)\(i\)-\(iii\)](#), must be determined using a 90 day “look back” period.

The CalFresh E&T program completion date or “exit date” is the last date of service. The last day of service cannot be determined until at least 90 days have elapsed since the participant last received services; services do **not** include job retention services. If a participant reengages in the CalFresh E&T program 90 days or more since their previous E&T program completion date, they are considered a **new** participant for reporting purposes.

OBSOLETE COMPONENTS

The 2018 Farm Bill eliminated job finding clubs as an allowable activity under the job search component and eliminated unsupervised job search as an allowable standalone component; the supervised job search component replaced job search as an allowable

component. Self-initiated Workfare is not reportable on the FNS 583 as a component; therefore, it will be removed from the STAT 47.

Acronym	Component Name
JS	Job Search
JC	Job Club
SIW	Self-Initiated Workfare

ORIENTATION AND ASSESSMENT

As outlined in [7 CFR 273.7\(c\)\(11\)\(iii\)](#), orientation and/or assessment are CalFresh E&T activities that inform participants about services available through CalFresh E&T. Individuals who attend orientation and/or assessment must be tracked to meet federal and state the reporting requirements. Orientation and/or assessment are typically the first activities participants engage in prior to enrollment into an E&T component.

Acronym	Activity Name
OA	Orientation/Assessment

SUPERVISED JOB SEARCH

As defined in [7 CFR 273.7\(e\)\(2\)\(i\)](#), supervised job search must occur at approved location(s) where the activities of CalFresh E&T participants are directly supervised and tracked. Supervised job search activities must have a direct link to increasing the employment opportunities of individuals engaged in the activity.

Acronym	Component Name
SJS	Supervised Job Search

EDUCATION

The education component includes a wide range of activities that improve basic skills, literacy, and employability. All education activities must have a direct link to employment and help CalFresh E&T participants move promptly into employment, as specified in [7 CFR 273.7\(e\)\(2\)\(vi\)](#).

Listed below are the allowable education components to be reported on the STAT 47.

Acronym	Component Name
EPB	Education Program Basic Includes Adult Basic Education, High School Diploma, and General Education Diploma
EPC	Education Program Career Includes Career and Technical Education and Vocational Training
EPEL	Education Program English Language Includes English as a Second Language and English Language Learners
EPI	Education Program Integrated Includes Bridge Programs
EPWRT	Education Program Work Readiness Training

WORK EXPERIENCE

The work experience regulations at [7 CFR 273.7\(e\)\(2\)\(iv\)](#) divide work experience into two categories: work activities and work-based learning.

Work activities must be designed to improve the employability of CalFresh E&T participants through actual work experience and/or training and to enable individuals employed or trained under such programs to move promptly into regular public or private employment.

Work-based learning must be sustained interactions with industry or community professionals in real world settings to the extent practicable, or simulated environments at an educational institution that foster in-depth, firsthand engagement with the tasks required in a given career field, that are aligned to curriculum and instruction. Work-based learning emphasizes employer engagement, including specific training objectives, and leads to regular employment.

Work-based learning can include internships, pre-apprenticeships, apprenticeships, customized training, transitional jobs, incumbent worker training, and on-the-job training as defined under WIOA. In addition, work-based learning can be subsidized or unsubsidized with CalFresh E&T funds.

Listed below are the allowable work experience components to be reported on the STAT 47.

Acronym	Component Name
WA	Work Activity
WBLI	Work Based Learning Internship
WBLI-SUB	Work Based Learning Internship Subsidized
WBLOJT	Work Based Learning On-the-Job Training
WBLPA	Work Based Learning Pre-Apprenticeship/Apprenticeship
WBLPA-SUB	Work Based Learning Pre-Apprenticeship/Apprenticeship Subsidized
WBLTJ	Work Based Learning Transitional Jobs
WBLTJ-SUB	Work Based Learning Transitional Jobs Subsidized
WBLO	Work Based Learning Other
WBLO-SUB	Work Based Learning Other Subsidized

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The revised STAT 47 and instructions will be released by the Research Automation and Data Division (RADD) in a forthcoming letter.

If you have any questions or need additional guidance regarding the information in this letter, contact the CalFresh Policy & Employment Bureau at CalFreshPolicy@dss.ca.gov or CalFresh E&T at CalFreshEandT@dss.ca.gov.

Sincerely,

Original Document Signed By

JENNIFER HERNANDEZ, Deputy Director
Family Engagement and Empowerment Division