

May 27, 2022

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

EXECUTIVE SUMMARY

ALL COUNTY LETTER NO. 22-41

The purpose of this All County Letter is to provide all entities responsible for the administration of the CalFresh Employment and Training (E&T) program, with instructions for complying with the Supplemental Nutrition Assistance Program E&T reporting requirements established by the United States Department of Agriculture, Food and Nutrition Service and the CalFresh E&T reporting requirements established by the California Department of Social Services .



KIM JOHNSON
DIRECTOR

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DEPARTMENT OF SOCIAL SERVICES
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GAVIN NEWSOM
GOVERNOR

May 27, 2022

ALL COUNTY LETTER NO. 22-41

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

SUBJECT: CALFRESH EMPLOYMENT AND TRAINING: COMPLIANCE
WITH FEDERAL AND STATE REPORTING REQUIREMENTS

REFERENCE: [INTERIM FINAL RULE: SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM EMPLOYMENT & TRAINING PROGRAM MONITORING, OVERSIGHT, AND REPORTING MEASURES; SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM CLARIFICATION OF EMPLOYMENT & TRAINING REPORTING REQUIREMENTS QUESTIONS AND ANSWERS PART II; PUBLIC LAW 115-334. SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM PROVISIONS OF THE AGRICULTURAL IMPROVEMENT ACT OF 2018; FINAL RULE, EMPLOYMENT & TRAINING OPPORTUNITIES IN THE SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM; ALL COUNTY DIRECTORS LETTER CALFRESH EMPLOYMENT & TRAINING: COMPLIANCE WITH FEDERAL AND STATE REPORTING REQUIREMENTS 7-19-2021; TITLE 7 CODE OF FEDERAL REGULATIONS \(CFR\) 273.7\(c\)\(11\)\(iii\); 7 CFR 273.7\(e\)\(2\)\(vi\); 7 CFR 273.7\(e\)\(2\)\(iv\); 7 CFR 273.7\(c\)\(17\); 7 CFR 273.7\(c\)\(17\)\(ii\)-\(iv\); ALL COUNTY LETTER 22-26](#)

The purpose of this All County Letter (ACL) is to provide all entities responsible for the administration of the CalFresh Employment and Training (E&T) program, with instructions for complying with the Supplemental Nutrition Assistance Program (SNAP) E&T reporting requirements established by the United States Department of Agriculture, Food and Nutrition Service (FNS) and the CalFresh E&T reporting requirements established by the California Department of Social Services (CDSS).

BACKGROUND

The SNAP E&T reporting requirements were established by the [Interim Final Rule: Supplemental Nutrition Assistance Program Employment and Training Program Monitoring, Oversight, and Reporting Measures](#), issued on March 24, 2016. The FNS released additional reporting guidance in the [Supplemental Nutrition Assistance Program Clarification of Employment and Training Reporting Requirements Questions and Answers Part II](#), issued on May 15, 2017. The reporting requirements are comprised of outcome measures based on the employment and earnings of current and former E&T participants. To monitor the effectiveness of the E&T program, the FNS requires the CDSS to submit outcomes data by January 1, annually.

In California, the “SNAP E&T Annual Report” is known as the “CalFresh E&T Participant Outcomes Report” and must include all individuals who participated in the CalFresh E&T program during the Federal Fiscal Year (FFY), October 1 through September 30. Due to the volume of data necessary to compile the report for submission to FNS, the CDSS requires all entities responsible for administration of the CalFresh E&T program to submit this data on a quarterly basis.

REPORTING CHANGES DUE TO STATUTORY AMENDMENT

The [Agricultural Improvement Act of 2018 Public Law 115-334](#) also known as the 2018 Farm Bill eliminated job finding clubs as an allowable activity under the job search component and also eliminated unsupervised job search as an allowable standalone component; the supervised job search component replaced job search as an allowable component. Therefore, CalFresh E&T participants searching for jobs must be enrolled in the supervised job search component and reported in the “CalFresh E&T Participant Outcomes Report”.

REPORTING CHANGES DUE TO THE FINAL RULE

The FNS published the [Final Rule, Employment & Training Opportunities in the Supplemental Nutrition Assistance Program](#), which made several programmatic changes including the CalFresh E&T work experience component definition and reporting requirements on January 4, 2021.

More information regarding reporting and automation changes to the California Statewide Automated Welfare System (CalSAWS) due to implementation of the Final Rule is located in [ACL 22-26](#) issued on April 1, 2022.

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 regular employment, as specified in [7 Code of Federal Regulations \(CFR\) 273.7\(e\)\(2\)\(vi\)](#).

Listed below are the allowable education components for new E&T participants who begin on or after **October 1, 2022**.

Acronym	Component Name
EPB	Education Program Basic <ul style="list-style-type: none">Includes Adult Basic Education, High School Diploma, General Education Diploma, and/or Foundational Skills Instruction
EPC	Education Program Career <ul style="list-style-type: none">Includes Career and Technical Education and/or Vocational Training
EPEL	Education Program English Language <ul style="list-style-type: none">Includes English as a Second Language, English Language Learners and/or Vocational English
EPI	Education Program Integrated <ul style="list-style-type: none">Includes Bridge Programs
EPWRT	Education Program Work Readiness Training <ul style="list-style-type: none">Includes soft skills development

WORK EXPERIENCE

The work experience component in accordance with [7 CFR 273.7\(e\)\(2\)\(iv\)](#) has been divided 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 can include internships, pre-apprenticeships, apprenticeships, customized training, transitional jobs, incumbent worker training, and on-the-job training as defined under the Workforce Innovation Opportunity Act (WIOA). In addition, work-based learning can be subsidized or unsubsidized with CalFresh E&T funds.

Listed below are the allowable work experience components for new E&T participants who begin on or after **October 1, 2022**.

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
WBLPA-SUB	Work Based Learning Pre-Apprenticeship Subsidized
WBLA	Work Based Learning Apprenticeship
WBLA-SUB	Work Based Learning 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

CALFRESH E&T PARTICIPANT OUTCOMES REPORT INSTRUCTIONS

Beginning in FFY 2023, **October 1, 2022**, all entities responsible for the administration of the CalFresh E&T program must collect and report participant component data as outlined in their approved FFY 2023 CalFresh E&T Annual Plan in accordance with [7 CFR 273.7\(c\)\(17\)](#).

Participants that began the CalFresh E&T program in a previous FFY may continue to be reported under their assigned components for reporting consistency. Participants who began E&T in the previous FFY may be reported under a new assigned component starting October 1, 2022 by end dating the previous component on September 30, 2022.

Example: A participant enrolls in the education component starting August 1, 2022. Participant remains engaged in component on October 1, 2022. The education component may be end dated on September 30, 2022 and the education program adult basic component may start on October 1, 2022.

This letter includes instructions on the following topics for the “CalFresh E&T Participant Outcomes Report”:

- Definitions
- Data Field Names, Definitions, and Reporting Instructions
- Report Submission Process
- Technical Assistance

DEFINITIONS

E&T PARTICIPANT

The definition of a CalFresh E&T participant, in accordance with [7 CFR 273.7\(c\)\(11\)\(iii\)](#), 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.

The report must include a unique line of data for each individual and the E&T activity and/or component which the individual participated in. For example, if an individual participated in orientation/assessment and supervised job search, there would be two lines of data for that individual with relevant dates.

COMPONENT

A CalFresh E&T component is defined as a service, activity, or program designed to help CalFresh recipients gain skills, training, or work experience. Components include but are not limited to supervised job search, workfare, work experience, self-employment, education, and job retention.

COMPONENT COMPLETION

As outlined in the [Supplemental Nutrition Assistance Program Clarification of Employment & Training Outcome Reporting Requirements Question & Answers Part II, #13](#), the definition of “component completion” for the measure outlined in [7 CFR 273.7\(c\)\(17\)\(iv\)](#) requires all entities responsible for the administration of the CalFresh E&T program to determine whether the participant completed all requirements of the component. Components must have end dates upon completion, unless the end date occurs in a future report year.

The CalFresh E&T component is complete when the participant finishes all requirements of the component, this includes component activities and length of services. For example, if a participant is enrolled in an eight-week activity and attends the first two weeks only, this component would then be assessed as incomplete, regardless of the reason for discontinuance.

If an individual is enrolled in multiple components, each component must be assessed for completion. If there is a component end date, there **must** be a corresponding completion status on the line item.

PROGRAM COMPLETION

As outlined in the [Supplemental Nutrition Assistance Program Clarification of Employment & Training Outcome Reporting Requirements Question & Answers Part II, #8](#), the definition “completion of participation” 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 after 90 days or more since their previous E&T program completion date, they are considered a **new** participant for reporting purposes. This principle is referred to as the “90 day look back” rule.

DATA FIELD NAMES, DEFINITIONS, AND REPORTING INSTRUCTIONS

The FFY 2023 CalFresh E&T Participant Outcomes Report template will be sent to all entities administering the E&T program via email in a Microsoft Excel application. The template includes data field names, definitions, and reporting instructions. Additional information on the required data fields, definitions and instructions is located in the [All County Directors Letter CalFresh E&T: Compliance with Federal and State Reporting Requirements](#), issued on July 19, 2021.

REPORT SUBMISSION PROCESS

All entities responsible for the administration of the CalFresh E&T program must submit the “CalFresh E&T Participant Outcomes Report” by the last day of the month following the end of the fiscal quarter for every individual who participated in CalFresh E&T. A written request must be submitted to the CDSS prior to the due date for an extension.

SUBMISSION SCHEDULE

Quarter	Reporting Period	Due Date
Q1	October 1-December 31	January 31
Q2	January 1- March 31	April 30
Q3	April 1-June 30	July 31
Q4	July 1-September 30	October 31

All participant data must be submitted to the CDSS through a Secure Automated File Exchange (SAFE) site. Prior to uploading the participant lists, all entities responsible for the submission of the report must validate the SSNs and dates provided. If any discrepancies are identified they must be corrected.

To meet the SNAP E&T reporting requirements, the CDSS will match current and former CalFresh E&T participant information against wage data provided by the California Employment Development Department (EDD). The CDSS has a Memorandum of Understanding (MOU) with the EDD which allows the CDSS to access wage data for all CalFresh recipients.

TECHNICAL ASSISTANCE

Existing SAFE site user credentials are still valid. New users must complete and submit form [GEN 1395](#) via email to CalFreshEandT@dss.ca.gov in order to receive access to the SAFE site.

If you have any questions regarding the “CalFresh E&T Participant Outcome Report” or need technical assistance, please contact the CalFresh E&T Section, at: CalFreshEandT@dss.ca.gov.

Sincerely,

Original Document Signed By

JENNIFER HERNANDEZ, Deputy Director
Family Engagement and Empowerment Division

ATTACHMENTS

CalFresh E&T Participant Outcomes Report Scenarios

Scenario #1

Summer Kiles is a CalFresh recipient. Summer meets with a CalFresh E&T case worker on February 16, 2022 and completes an orientation to learn her rights and responsibilities for CalFresh E&T the same day. Summer begins the supervised job search (SJS) component on February 23, 2022. Summer completes all requirements for the SJS component on March 31, 2022. Summer is offered a job and starts working on April 1, 2022. Summer is enrolled in the job retention component on April 1, 2022. She successfully completes the job retention component on June 30, 2022.

Key Points:

- Participant “starts” the E&T program by attending orientation
- Participant can only be enrolled in job retention for a maximum of 90 days, upon completion of another qualifying E&T component

***Note:** The 90 day look back rule does **not** apply to the job retention component for determining the program end date

Participant	SSN	Sex	Program Start Date	Component Name	Component Start Date	Component End Date	Component Completion Status	Program End Date
Summer Kiles	223445656	01	02/16/2022	Orientation/ Assessment	02/16/2022	02/16/2022	1	03/31/2022
Summer Kiles	223445656	01	02/16/2022	Supervised Job Search	02/23/2022	03/31/2022	1	03/31/2022
Summer Kiles	223445656	01	02/16/2022	Job Retention	04/01/2022	06/30/2022	1	

Scenario #2

Joe Jimenez is a CalFresh recipient. Joe decides to participate in CalFresh E&T and completes orientation and assessment on March 15, 2022. He enrolls in SJS on March 15, 2022. On April 5, 2022, Joe stops attending SJS and is unreachable by his CalFresh E&T case manager. As of July 5, 2022, 90 days have passed, and Joe has **not** come back for CalFresh E&T services; the program end date is entered as **04/05/2022**.

Key Points:

- Participant receives orientation and assessment on the same day
- Participant enrolls in SJS, but then drops out before completing all requirements
- Participant's last day of attendance is considered the last date of participation once 90 days have passed without reengagement (90 day look back rule)

Participant	SSN	Sex	Program Start Date	Component Name	Component Start Date	Component End Date	Component Completion Status	Program End Date
Joe Jimenez	012356789	02	03/15/2022	Orientation/ Assessment	03/15/2022	03/15/2022	1	04/05/2022
Joe Jimenez	012356789	02	03/15/2022	Supervised Job Search	03/15/2022	04/05/2022	0	04/05/2022

Scenario #3

Kris Stevens was recently let go from a job as a cashier at a local fast food restaurant. On January 11, 2022, Kris learns more about CalFresh E&T when they visit the county to apply for CalFresh benefits. Kris attends orientation and assessment the same day. Kris enrolls in On-the-Job Training (OJT), which begins January 19, 2022. Kris meets the component participation requirements until January 25, 2022, when they decide to take a different job, not associated with CalFresh E&T. As of April 25, 2022, 90 days have passed, and Kris has **not** come back for CalFresh E&T services; the program end date is entered as **01/25/2022**.

Key Points:

- Participant is eligible to receive CalFresh E&T on date of application of benefits
 - Participant enrolls in OJT, under the work experience component
 - Participant is considered completed on last day of attendance in component, following the 90 day look back rule
- *Note:** Participant did **not** complete all elements of the WBLOJT, therefore the component must be reported as incomplete per FNS guidelines.

Participant	SSN	Sex	Program Start Date	Component Name	Component Start Date	Component End Date	Component Completion Status	Program End Date
Kris Stevens	014326789	98	01/11/2022	Orientation / Assessment	01/11/2022	01/11/2022	1	01/25/2022
Kris Stevens	014326789	98	01/11/2022	Work-Based Learning-OJT	01/19/2022	1/25/2022	0	01/25/2022

Scenario #4

Tara Nguyen is a CalFresh recipient. Tara completes an Employability Assessment with an Employment Specialist at the county office on July 20, 2022. After completing the assessment, she attends an orientation session on July 25, 2022.

Tara is enrolled in the SJS component with a scheduled start date of August 1, 2022; however, before beginning the component, Tara finds a job and no longer participates in the program. A month later (September 10, 2022), Tara returns to CalFresh E&T for assistance finding a better paying job. The 90 days has not passed since Tara first participated in CalFresh E&T, therefore she is not required to complete a new Employment Assessment and attend another orientation session. The Employment Specialist enrolls her in the Vocational Training and Tara begins courses at her local Community College on October 10, 2022. In addition, the Employment Specialist refers Tara to their partner, a community-based organization (CBO), that will provide Tara with an intensive, six-week training in Self-Employment, from October 10, 2022 – November 23, 2022.

Key Points:

- Employment activity spans two report years
- Participant is enrolled in SJS, but never attends the component; therefore, this component is not reported
- Participant reengages in E&T services before 90 days have passed
- Participant is enrolled in two components simultaneously

Note: The table below is a representation of components and activities engaged in by the participant in the current fiscal year and will be reflected on the next FFY report.

Participant Outcomes Report – FFY 2022/Quarter 4

Participant	SSN	Sex	Program Start Date	Component Name	Component Start Date	Component End Date	Component Completion Status	Program End Date
Tara Nguyen	678912345	01	07/20/2022	Orientation/ Assessment	07/20/2022	07/25/2022	1	

Scenario #4 Continued

Participant Outcomes Report - FFY 2023/Quarter 1:

Participant	SSN	Sex	Program Start Date	Component Name	Component Start Date	Component End Date	Component Completion Status	Program End Date
Tara Nguyen	678912345	01	07/20/2022	Education Program Career	10/10/2022			
Tara Nguyen	678912345	01	07/20/2022	Self- Employment Training	10/10/2022			