

**Senate Bill 1041 Implementation  
Field Monitoring  
Visit Summary**

**Orange County**

**Visit Date: September 24, 2013**

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES  
Welfare to Work Division  
Todd R. Bland, Deputy Director

**Orange County**  
Senate Bill (SB) 1041 Implementation  
Field Monitoring Visit Summary

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**Executive Summary**

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**Purpose of Field Monitoring Visit**

The purpose of the Senate Bill (SB) 1041 implementation field monitoring visit is to obtain information regarding the county's progress in implementing program changes enacted by SB 1041 (Chapter 47, Statutes of 2012).

**Scope of Field Monitoring Visit**

Specifically, the California Department of Social Services (CDSS) will review how each County Welfare Department (CWD) implemented SB 1041 program changes, including but not limited to:

- New Welfare to Work (WTW) participation requirements;
- WTW 24-Month Time Clock;
- Reengagement of the short term young child exempt population (Assembly Bill [AB] X4 4 group);
- CWD staff knowledge of SB 1041 changes;
- Training provided to staff in order to implement these changes; and
- Any pertinent data related to these program changes that are available.

**Goals of Field Monitoring Visit**

The CDSS' goals are to ensure that SB 1041 is being implemented correctly by each CWD, to gather promising practices in regards to implementation, to share these promising practices (when able) amongst all CWDs throughout the State, and to determine whether systematic or program issues relating to the integration of SB 1041 changes into the existing California Work Opportunity and Responsibility to Kids (CalWORKs) and WTW program exist throughout the state. If such issues exist, they will be addressed by the SB 1041 Oversight Workgroup.

**County Visit General Information**

This one-day field monitoring visit was performed in Orange County on Tuesday, September 24, 2013, at the County of Orange Social Services Agency (SSA) office in Santa Ana, CA. The field monitoring visit team included three staff members from the CDSS, WTW Division, CalWORKs Employment and Eligibility Branch, Kären Dickerson, Geoffrey Miller, and Melissa Kenney, along with the Orange County Social Services Agency, Family Self-Sufficiency Division Director, Nathan Nishimoto; Regional Services Deputy Director, John Hendrickson; Employment and Support Services Deputy Director, Ben Blank; Eligibility and Contract Support Services Program Managers Veronica Cowgill and Donna Jefferson; Administrative Manager of Operations, Liz Rivera; program policy managers, and county caseworkers (Social Services Workers). The field monitoring visit

consisted of a kick-off meeting, close-out meeting, staff and administrator interviews, and case management observations with Orange County staff.

### **Implementation Strategy**

Orange County's step by step approach to implementing SB 1041 program changes was well organized and comprehensive. Orange County developed an extensive amount of informative documentation that thoroughly explained the program changes and the impact on tasks carried out by case managers and staff. Orange County issued monthly Program Summary memorandums, implementation tools, and question and answers that provided a comprehensive body of guidance to educate county staff on the SB 1041 changes. Also, Orange County supervisors made effective use of tracking tools and checklists to ensure that clients were receiving the notices, information and understood options available under SB 1041.

Orange County also required various trainings to staff members on program changes that included program staff meetings, team meetings, unit training, and town hall meetings, in addition to the training classes that were provided by Orange County's Training and Career Development Department. The trainings ranged from classroom style instruction to informal staff meetings where implementation strategies and potential challenges and questions could be discussed openly. Orange County also created various comprehensive job aids, conducted comprehensive reviews of case files and utilized various tracking tools to ensure that SB 1041 requirements (i.e. WTW 24-Month Time Clock Comprehensive Discussion, reengagement, completion of the new WTW 2, etc.) were implemented. *New Rules for CalWORKs Welfare-To-Work Activities* and *WTW 24 Month Time Clock* forms that were used by its social services workers and case managers to assist clients in understanding the new program options were used.

### **Successes**

Orange County's step by step approach to implementing the SB 1041 program changes was well organized and comprehensive. Orange County developed an extensive amount of informative documents which thoroughly explained the program changes and the impact on tasks carried out by county staff. The monthly Orange County CalWORKs FSS Program Summary memorandums, implementation tools, and question and answers provided a comprehensive body of guidance to educate county staff on the SB 1041 changes. Also, Orange County supervisors made effective use of tracking tools and checklists to ensure that clients were receiving the notices, information and options available under SB 1041. The overall structure and depth of these documents appeared to benefit Orange County's implementation of SB 1041 program changes.

Orange County also offered various training opportunities to staff on program changes, including program meetings, team meetings, unit training and town hall meetings, in addition to the training classes that were provided by Orange County's Training and Career Development Department. Orange County also conducted comprehensive reviews of case files and utilized various tracking tools to ensure that SB 1041 requirements (e.g. WTW 24-Month Time Clock Comprehensive Discussion, reengagement, completion of the new WTW 2, etc.) were implemented. *New Rules*

for CalWORKs Welfare-To-Work Activities and WTW 24 Month Time Clock forms were used by its case managers to assist clients in understanding program options.

### **Key Recommendations**

Orange County should continue to collect data on SB 1041 implementation and pay close attention to the data which is submitted through its CalWIN consortium system to the CDSS for the monthly CalWORKs Cash Grant Caseload Movement Reports (CA 237 CW) and CalWORKs WTW Monthly Activity Reports for All (Other) Families and Two Parent Families (WTW 25/25A). These sources are relied upon heavily by the state for analysis and budgeting.

The CDSS also recommends that Orange County continue to work with and monitor its contractor, MAXIMUS, to ensure that SB 1041 policy guidance from the CDSS is received and implemented to all CalWORKs clients in the county. (Note: CDSS understands that a review of the contract was done in May 2013) The CDSS also recommends that Orange County continue to review months counted on the new WTW 24-Month Time Clock, the CalWORKs 48-month time limit, and the 60-month Temporary Assistance for Needy Families (TANF) clock in CalWIN consortium system to ensure accuracy and consistency.

### **Acknowledgments**

The CDSS thanks the County of Orange Social Services Agency for hosting this field monitoring visit. The CDSS appreciates the open collaboration with CWD staff to ensure the continued success of the CalWORKs program.

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## Background and Data

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### Orange County at-a-glance

Total Caseload .....	<b>22,080</b>
(Source: CalWORKs Cash Grant Caseload Movement Report [CA 237 CW] Line Item 8-May, 2014)	
WTW Enrollees .....	<b>5,102</b>
(Source: CalWORKs Welfare-to-Work Monthly Activity Report [WTW 25/25A] Line Item 1-April, 2014)	
Mandatory Participants (enrollees + sanctioned + non-compliance) .....	<b>7,610</b>
(Source: CalWORKs Welfare-to-Work Monthly Activity Report [WTW 25/25A] Line Item 1, 3A, and 31-April, 2014)	
Reengagement Plan Received .....	<b>Yes</b>
Beginning Date of Reengagement.....	<b>September 2013</b>
Consortium System .....	<b>CalWIN</b>

### Data/Statistics Available at Time of Field Monitoring Visit

- Clients with more than 24 months left on their CalWORKs 48-month time limit as of January 1, 2013 who have had their comprehensive discussion: **2,419**
- Clients with less than 24 months left on their CalWORKs 48-month time limit as of January 1, 2013 who have had their comprehensive discussion: **653**
- Clients who have elected to change their WTW Plans as a result of SB 1041 new participation requirements: **3072**
- Sanctions that were cured as a result of SB 1041: **6**
- Clients who have met the definition of reengaged: **2 (of the 1,209)**
- Clients who have elected to take the New Young Child Exemption: **351**

*PLEASE NOTE:*

- *This data was provided by the county in advance of the County Field Monitoring Visit.*

### Summary of Documents provided by Orange County

- Orange County Re-engagement Process Checklist
- Program Reengagement Flow Chart
- Reengagement Policy Memorandum
- Orange County SB 1041 training materials for county staff
- CalWORKs notifications including informing notices and appointment letters provided to clients relevant to SB 1041 implementation
- Orange County's Assembly Bill (AB) X4 4 Short Term Exemption Reengagement Sequencing Plan
- Instructional and clarifying email correspondence with all staff regarding SB 1041 implementation
- Orange County CalWORKs Family Self-Sufficiency (FSS) Program Summary monthly memoranda

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## **County Administrator and Caseworker Interviews**

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The CDSS field monitoring team used the county administrator and caseworker interview tools released in All County Information Notice I-42-13 to interview the Orange County administrator and Social Services Workers in person regarding SB 1041 implementation. The tools were provided to the Orange County administrator and Social Services Workers in advance of the visit. The administrator interview panel consisted of three CDSS staff and six county administrators. The Social Services Worker interviews were conducted by two teams of CDSS staff members (one team of two CDSS staff members, and one team of a single CDSS staff member) with each team interviewing one Social Services Worker.

### **Summary of Observations**

#### **WTW 24-Month Time Clock Implementation and New WTW Participation Requirements**

##### **Transitioning Clients**

**[Less than and more than 24 months left on their CalWORKs 48-month time limit as of January 1, 2013]**

In April 2013, Social Services Workers in Orange County and MAXIMUS, a contractor that provides case management to half of the county's Welfare-To-Work CalWORKs caseload, were instructed to outreach to all clients assigned prior to April 30, 2013, to conduct WTW comprehensive discussions regarding the SB 1041 changes. This task was completed by June 30, 2013. Case Managers met with their respective Lead Case Managers and Supervisors as often as weekly to provide status updates and ensure on time completion.

For those cases assigned after May 1, 2013, comprehensive discussions were completed during the Orientation/Appraisal or Re-Appraisal appointments or other routine contacts. For example, caseworkers make monthly or more frequent contact with clients to monitor progress in their activities, at which time the comprehensive discussions were held. Comprehensive discussions were held in-person or over the phone, depending on circumstances of the contact.

The interviewed case manager indicated most transitioning clients quickly and easily gained an understanding of the new program rules. However, administrators reported some difficulties with staff and client understanding of rule changes, particularly in the early months of implementation.

After the comprehensive discussion, the clients' goals are discussed and reviewed against the client's progress at each meeting using participation verification that is turned in each month. The goal for most clients is to become self-sufficient through employment. The client and caseworker review different WTW path options, depending on the client's current situation and background. Clients are often encouraged to choose activities that will meet CalWORKs federal standards to preserve the flexibility of the WTW 24-Month Time Clock for use later during their time on CalWORKs. Ultimately, it is the client's decision as to which WTW2 plan will be used. Clients who

transition generally select the lower hourly requirement and are satisfying their minimum core hour requirements to meet CalWORKs federal standards to stop the WTW 24-Month Time Clock.

### **Clients who failed to attend SB 1041 appointments**

Orange County and MAXIMUS WTW case managers are instructed to contact clients during the first five days of every month. Newly referred clients and clients with expired WTW Plans who miss their appointments and do not respond to attempted contacts are placed in program non-compliance and subject to sanction. Clients with current WTW plans and satisfactory participation are rescheduled and outreach efforts continue until contact is made. If client is not responsive to these outreach efforts and the WTW Plan expires, the case is submitted for program non-compliance process and possible sanction. When appropriate, Orange County and MAXIMUS staff conducts home visits.

During the beginning of the comprehensive discussion process (April to June 30th, 2013) if a client was unresponsive to initial efforts, the case was reviewed to determine if the current WTW plan was valid. If the WTW plan was still active and met new WTW participation requirements, the case worker would transfer current activities to new form and mail out the WTW 2, which the client had 30 days to return with their signature. If the plan was returned in a timely manner, the WTW 24-Month Time Clock started the 1st of the following month after the plan was mailed back. If plan was not returned, the WTW 24-Month Time Clock would start the first day of the following month after the original 30-day period ended. If during that time the plan on file expired, the case would have been submitted for non-compliance and possible sanction. Currently, if the client does not come in for a scheduled appointment to sign a new WTW plan and have the comprehensive discussion, the case is submitted for non-compliance the day following the missed appointment.

### ***General Comments***

*Orange County Initial Service Workers provide upfront services such as applicant eligibility determination for CalWORKs, access to supportive services and make assignments to orientation, job search and job readiness services, and assessment activities. Clients who are determined to need ongoing services provided in WTW are assigned to case managers for development of a WTW plan and assignment to work activities. Eligible cases where the adult(s) is (are) not engaged in WTW, such as WTW exempt, sanction, zero-parent, and timed out cases, are managed by eligibility caseworkers, who perform case eligibility activities and periodic noticing as needed. Beginning April 2014, Orange County will be implementing a service delivery model to administer the CalWORKs program, under which cases will be compartmentalized into separate eligibility and WTW delivery systems from the initial intake stage and into ongoing services.*

*Orange County contracts with ResCare (formerly Arbor), which provides job search and job readiness activities (Job Club) to CalWORKs clients. ResCare provides employment workshops, interview coaching, resume building and online/computer resources.*

*Orange County utilizes in-house case managers for half of its WTW caseload, and contracts with MAXIMUS to provide case management for the other half of the caseload receiving services in the Northern and Western regions of the county.*

### **New Young Child Exemption**

According to the interviewed caseworker, some clients opt to use the New Young Child Exemption; however, most chose not to use the exemption and, for example, returned to school to take advantage of the lower 20 hour requirement for single-parent Assistance Units (Note: From the County perspective, Orange County does not know if this is a true statement). In other cases, the client may be part of a two-parent household in which spouse is already meeting the required number of hours for the family.

### **Clients with Good Cause for Lack of Supportive Services**

Orange County utilized the AB X4 4 option to provide clients with WTW good cause due to lack of supportive services with a CalWORKS 48 month time limit exemption for the 6-12 month population. Re-engagement letters were sent and many clients chose to take the new young child exemption if eligible.

### **The New WTW Plan Activity Assignment Form (WTW 2)**

All Orange County and MAXIMUS case managers started using the new WTW 2 in April 2013. Orange County used the previous version until the new form was available and as required, presented new WTW 2 plans to client's in-person or by mailing them to obtain signatures. The new WTW 2 has served as a great visual aid in helping case managers explain the difference between the federal core and WTW 24-Month Time Clock activities. At times, there has been confusion when completing the WTW 2 for two-parent households when both parents are participating.

The case manager interviewed recommended changing the line under the Total Hourly Requirements section to state, "At least \_\_\_ hours of my family's 35 hour requirement of which \_\_\_ core hours meet my family's 30-core hour requirement" to "At least \_\_\_ hours of my family's 35 hour requirement of which I am contributing \_\_\_ hours and my spouse is contributing \_\_\_ hours to meet our family's 30-core hour requirement" in order to indicate specifically how many hours each parent is participating. Other sections pertaining to two-parent households should also be revised in the same manner.

For clients in a Self-Initiated Program (SIP) or vocational education activity, Orange County develops the WTW Plan based on the client's Education Plan, training start date, total time in school so far, and anticipated graduation date. Clients with less than 24 months left on aid or those who have exhausted their 12 months of federally allowable vocational education and training would fall under the WTW 24-Month Time Clock side of the WTW 2. Clients who recently started school and are scheduled to be in school for 12 months or less are encouraged to use months of vocational education on the right side of the WTW 2. Clients anticipated being in school



longer than 12 months are encouraged to participate in core activities as often as they can in the beginning of their school term when classes tend to be less demanding in order to save time on the WTW 24-Month Time Clock and in federally countable vocational education during more demanding terms. Activities discussed in such instances include part-time employment and work experience. Orange County also discusses supportive services like child care, transportation and ancillary expenses with their clients.

### **Reengagement Process**

Beginning September 2013, Orange County plans to reengage short term young child exempt (AB X4 4) clients at the month of each client's Reinvestigation Recertification Review (RRR) appointment. Policy was developed to provide instructions and tools to staff to reengage these clients. Staff will either meet in-person with clients or conduct comprehensive discussions via telephone. Staff is instructed to review the clients' family situation to determine if the client is eligible for another exemption, including the new young child exemption. Staff conducts the comprehensive discussion to explain the new hourly requirements and flexibility during the WTW 24-Month Time Clock period, evaluate the client for any barriers, and provide services to assist the client to meet the hourly requirements. Staff is also encouraged to assist the client with selecting activities that are advantageous to the client's employment and self-sufficiency goals. A flow chart provided by the CDSS was revised for use by Orange County and is used to assist staff with determining the appropriate activity(ies) to reengage clients in based on their past WTW participation prior to the exemption. Staff conducts pre-SIP determinations when applicable.

Orange County began sending the Reengagement Informing Notice (CW 2206) in July 2013 for reengagement evaluation appointments in September 2013. An Excel spreadsheet is used to monitor timely noticing and the general reengagement of clients. The July noticing was conducted on target; however, reengagement evaluations and staff feedback will be monitored to determine how these evaluations are going as the reengagement process proceeds.

For clients who wish to reengage early, staff are instructed to advise them of their scheduled reengagement month. Additionally, clients are advised that time will begin to tick towards their 48 month time limit and their WTW 24-Month Time Clock may tick based on their WTW activities. Prior to reengaging early, clients are offered the opportunity to participate as a volunteer. Clients are advised of possible sanctions if they reengage and do not meet WTW requirements. Clients wanting to volunteer prior to being reengaged are scheduled for an Orientation/Appraisal or Reappraisal appointment and updated to volunteer status until they have been fully reengaged.

Clients volunteering ahead of being reengaged remain volunteers until their reengagement date. For those volunteering and qualifying for the short-term young child exemption, Orange County waits until the client's designated reengagement date and then updates the exemption to the New Young Child Exemption, if applicable.

Orange County policy requires Ongoing Social Workers (OSW) to start the process by sending out the first notice 60 days prior to the Re-engagement Evaluation Appointment (REA) date. A second customized notice is sent 30 days prior to REA.

The third contact (either verbal or written) is completed prior to REA. During the reengagement evaluation, clients will participate in orientation/appraisal, if not previously completed, or re-appraisal as appropriate. Comprehensive discussions also take place during this appointment. Details of the new WTW Program are explained, clients are evaluated for the new once-in-a-lifetime Young Child Exemption, informed of time left on aid, assigned activities, assigned to barrier removal activities and referred for supportive services.

Upon case assignment, case manager supervisors review cases to identify those requiring reengagement. Supervisors search for cases in the Temporary Exemption Report (TER) to ensure it is listed, tracked, and updated as needed. Supervisors monitor the TER on a daily basis to ensure cases which had CW 2206s mailed out 30-days prior have been sent a CW 2206. All updates to the TER must occur within 24 hours of case manager action.

### **Implementation Strategies**

Orange County developed policies, procedures, worker tools, training and monitoring tools to implement the WTW 24-Month Time Clock. Training was provided in March and April 2013 and all staff began conducting comprehensive discussions and obtaining new WTW plans in April 2013 for all clients with a goal to complete all comprehensive discussions by June 30, 2013. Checklists and monitoring tools were utilized by case managers, supervisors and management to ensure the program changes were completed accurately and timely. Program meetings, team meetings, all supervisory team meetings were conducted and information provided to assist with ensuring staff understood the new rules, new flexibility, and timelines provided by these changes. Orange County continues to provide question and answers and clarification to staff regularly.

Orange County's Training and Career Development Department conducted mandatory four-hour training for Services Social Workers and Case Managers and a two-hour training for the Employment and Eligibility Specialists on SB 1041 program changes. Orange County developed training aids based on the CDSS Training Aid.

Orange County utilized program meetings, team meetings, unit training and Town Hall meetings in addition to the training classes that were provided by the Orange County Training and Career Development Department. An Orange County CalWORKs FSS Program Summary memorandum was issued each month, which provides detailed information regarding the policy, procedures, and implementation tools. Additionally, Orange County issued two Question and Answer documents containing Question and Answers received from the CDSS, as well as question and answers developed by the county. Orange County's operational administration team is conducting case reviews to ensure cases are processed accurately. Team meetings and monthly employee/supervisor conferences are conducted to ensure staff understands these program changes.

Staff have shared that the changes have been difficult as the CDSS instructions came in March 2013 and the implementation began in April 2013. Additionally, staff had to implement the new once-in-a-lifetime young child exemption, reengage clients that were previously exempt due to lack of supportive services or exempt under the former short-term young child exemptions.

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## Case Reviews

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The CDSS field monitoring team reviewed five cases selected by Orange County in advance of the visit. The purpose of this component of the visit was to review how SB 1041 program changes are being integrated into case management, understand how SB 1041 policies are being operationalized by individual Social Services Workers, and better comprehend case management within Orange County.

There were five specific case types requested:

- Case One - A client with ***less than or equal to*** 24-months left on the CalWORKs 48-month time limit as of January 1, 2013;
- Case Two - A client with ***more than*** 24-months on the CalWORKs 48-month time limit as of January 1, 2013;
- Case Three - A new client (with a beginning date of aid January 1, 2013 or later);
- Case Four - A client who was sanctioned, had reported earnings and whose case was curable based on the new participation requirements (preferably a case actually cured since January 1, 2013 based on new participation requirements); and
- Case Five - A client that was part of the short-term young child exemption (AB X4 4) population, and is in the process of or has been reengaged (if applicable).

### ***General Comments***

*Orange County uses the CalWIN case management system. The following is a summary of the case findings:*

- Noticing Requirements  
All noticing requirements for the *New Rules for CalWORKs WTW Activities Informing Notice* (CW 2205) and *Your WTW 24-Month Time Clock Notice* (CW 2208) were met for all cases reviewed. A county substitute form was used in place of the CW 2208.
- Comprehensive Discussions and Additional Outreach  
The two transitioning cases reviewed had both received a comprehensive discussion during an in person appointment with their respective Social Services Worker. Notation of these discussions was found in the case journal narrative section of CalWIN consortium system.
- WTW Plan Activity Assignment Form (WTW 2)  
All case files reviewed with WTW Plans developed on or after January 2013 (new case and both transitioning cases) used the new WTW 2. The sanction case reviewed did not have a WTW 2 on file due to the case being discontinued before the plan was developed. The reengagement case was in an active volunteer plan and became ineligible due to receipt of Supplemental Security Income (SSI) benefits before the new WTW 2 could be developed.

- Sanction Case  
For the sanction case, Orange County was able to cure the client's sanction automatically based on the new lower hourly requirements and received a comprehensive discussion. The case was subsequently discontinued as a result of becoming ineligible due to income.
- Reengagement Case  
The case reviewed met all reengagement noticing requirements, including the *Young Child Exemption Ends December 31, 2012 - New Rules for CalWORKs WTW Activities (CW 2206)*, timelines for the secondary contact/appointment, third contact reminder, etc. The case was discontinued however due to the parent becoming a recipient of SSI benefits before completing the reengagement process.
- New Young Child Exemption  
Only one case reviewed was eligible for the new young child exemption; however, the case was discontinued and the exemption was not used.

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## Conclusion

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### Challenges

The delay in the issuance of instruction by the CDSS was a hardship and needed clarification on certain policy questions which delayed the county's ability to begin the comprehensive discussion process with transitioning clients, implementing the new hourly participation requirements correctly, and implementing the new CalWORKs federal standards. Orange County did note that the continued issuance of SB 1041 related Questions and Answer All County Letters and other policy guidance provided by the CDSS has been beneficial.

### Key Recommendations

Orange County should continue to collect data on SB 1041 implementation and pay close attention to the data which is submitted through its CalWIN consortium system to the CDSS for the monthly CalWORKs Cash Grant Caseload Movement Reports (CA 237 CW) and CalWORKs WTW Monthly Activity Reports for All (Other) Families and Two Parent Families (WTW 25/25A). These sources are relied upon heavily by the state for analysis and budgeting.

The CDSS also recommends that Orange County continue to work with and monitor its contractor, MAXIMUS, to ensure that SB 1041 policy guidance from the CDSS is received and implemented to all CalWORKs clients in the county. The CDSS also recommends that Orange County continue to review months counted on the new WTW 24-Month Time Clock, the CalWORKs 48-month time limit, and the 60-month TANF clock in CalWIN to ensure accuracy and consistency.

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**Contact**

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Geoffrey Miller, *FMV Summary Author*  
CalWORKs Employment Bureau, Welfare to Work Division  
California Department of Social Services  
744 P Street, M.S. 8-8-33  
Sacramento, CA 95814  
Phone: (916) 654-6091  
Email: [Geoffrey.Miller@dss.ca.gov](mailto:Geoffrey.Miller@dss.ca.gov)

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