

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

San Benito

Visit Date: March 5, 2014

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

San Benito County
Senate Bill (SB) 1041 Implementation
Field Monitoring Visit Summary

Executive Summary

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 San Benito County on Wednesday, March 5, 2014, at the San Benito County Department of Health and Human Agency in Hollister, CA. The field monitoring visit team included three staff from the CDSS, WTW Division, CalWORKs Employment and Eligibility Branch along with San Benito County's Deputy Director, CalWORKs Supervisor, two county integrated caseworkers (ICWs) and an employment training supervisor. The field monitoring visit consisted of a kick-off meeting, close-out meeting, staff and administrator interviews, and case management observations with county staff.

Implementation Strategies

San Benito County's implementation strategy consisted of developing an initial communication plan between key management level staff prior to disseminating information to staff in an effort to ensure a consistent understanding of the SB 1041 requirements was established. During the time of the county one day visit, San Benito County had many new staff, including a new Director. Strategies used to facilitate the sharing of information within the county included, but were not limited to, staff correspondence material, weekly information sharing meetings with CalWORKs agendas specific to SB 1041 and an ongoing evaluation of policies, procedures and resources that were centered around determining further staffing needs and organizational changes. During the time of the visit, the county was also evaluating the establishment of a Program Integrity Unit to provide quality control oversight as the county proceeds to implement new processes and procedures impacting clients.

Some of San Benito's Key Successes Included:

- Enthusiasm demonstrated under new leadership and direction from the Director, Deputy Director and management staff set the foundation for the SB 1041 implementation process.
- Attendance and participation at County Welfare Director Association (CWDA) annual conference and the 2013 CalWORKs Training Academy contributed to increased understanding of SB 1041 requirements and strategies needed within San Benito County.
- Weekly meetings provided a good avenue for sharing knowledge and general information to staff on SB 1041 requirements and further explaining and/or clarifying information provided by the CDSS via All County Letter (ACL) and/or All County Information Notice (ACIN).
- Updated the WTW Handbook during the month of October 2013 that included, but was not limited to, SB 1041 24-month time clock requirements and exemption changes.
- Completion of an internal assessment within the county thus acknowledging that further development and creation of SB 1041 policies and procedures were needed to continue enhancing the county's WTW services to clients.
- Established partnership with the University of California, Davis to assist San Benito County with SB 1041 staff training.
- Facilitated assistance efforts with neighboring counties to strengthen upfront efforts with clients starting with orientation.

Key Recommendations

As San Benito County continues its implementation strategy, the county should continue developing and implementing policies and procedures along with formal staff SB 1041 training that will ensure compliance with SB 1041 requirements. San Benito County should assess behavioral health services needs to ensure clients who receive the benefit from such services. Clients that have access to all available support services including behavioral well-being could alleviate potential barriers to self-sufficiency and will improve client success within the CalWORKs program.

San Benito County should continue to strive to engage clients as soon as possible once cash assistance is granted, thus potentially lowering the approximate 45 day time period between client intake appointments and the appraisal process.

As San Benito County continues implementing SB 1041 changes, the county should also take the opportunity to review and update, where needed, CalWORKs WTW forms and client informational materials (i.e client orientation materials, self-appraisal tool etc.) to ensure information provided to clients is update. Although the county's WTW handbook had been updated in some sections to include

SB 1041 requirements, the county should further review the hours of participation section covering two-parent households to ensure the hourly requirement noted within WTW handbook are reflective of current requirements as noted in ACL 12-67 "hourly requirements can be met by one adult or through a combination of both adults' participation hours (core hours can be shared)." Also the county should continue to explore outreach opportunities with other counties who may have promising practices that may benefit San Benito County's remaining SB 1041 implementation plans.

The CDSS also recommends that San Benito County pay close attention to the data which is submitted through their Consortium-IV (C-IV) 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) and CalWORKs WTW Monthly Activity Reports for All (Other) Families and Two Parent Families (WTW 25/25A). The county should ensure systems are in place to verify that data submitted via C-IV accurately reflects clients time clock information, in addition, ensuring Enterprise II Lite (E2Lite) data reporting is current as well. These data sources are relied upon heavily by the CDSS to track and measure program progress.

Acknowledgments

The CDSS thanks the San Benito County Department of Health and Human 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.

Field Monitoring Visit Summary

Introduction

Purpose of Field Monitoring Visit

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San Benito County Health and Human Services Agency provides services at one location in Hollister, CA. The San Benito County office is composed of several social service divisions including, but not limited to:

- CalWORKs
- CalFresh
- In-Home Support Services
- Child Protective Services
- Adult Protective Services
- Medi-Cal
- Behavioral and Mental Health Services
- Employment Development Department (EDD)
- ManPower Employment Services

At the time of the one-day field monitoring visit, San Benito County had six ICWs handling both eligibility and employment responsibilities and one employment specialist providing CalWORKs employment training services to clients in the WTW job club classes, referred to within San Benito County as JobLINK. The JobLINK activity includes formal classroom style training. Clients enter into job search after completion of classroom portion of JobLINK. The ICWs roles primarily center around CalWORKs eligibility services related to WTW activities and supportive services. Employment Training Workers (ETWs) responsibilities focus primarily on work experience and job training workshops.

The first point of contact for an applicant seeking CalWORKs aid occurs with an intake worker who reviews a client's application and performs an interview to determine eligibility for CalWORKs and/or other forms of aid which the applicant may qualify for (e.g. CalFresh, MediCal, Covered California etc). During the time of the site visit, most intake workers within San Benito County were bilingual in both English and Spanish languages. San Benito County's coordination efforts utilized a task based model to determine appropriate next steps for clients. Orientation/Appraisal typically occurred 45 days after an intake appointment. It is also during orientation were clients first obtained information on the new child exemption for those that may qualify. During an applicants' emergency situation where aid is needed immediately, clients can receive same day appointments, however under normal circumstances, non-emergency appointments are scheduled by the county and applicants' are notified via appointment letter of date and time. Appointments typically occur within 10 business days within the county.

San Benito County's population consist of approximately 56, 000 residents and is comprised largely of a rural area with a large migrant workforce. A housing center serving migrant workers is situated within San Benito County and offers housing accommodations during the off season. Limited public transportation is available within San Benito County, however local routes within the surrounding San Benito County area and to Gilroy, CA were the majority of the employment opportunities exist for locals is available.

Background and Data

San Benito at-a-glance

Total Caseload	705
(Source: CalWORKs Cash Grant Caseload Movement Report [CA 237 CW] Line Item 8a-February 2014)	
WTW Enrollees	246
(Source: CalWORKs WTW Monthly Activity Report [WTW 25/25A] Line Item 1-February 2014)	
Mandatory Participants (enrollees + sanctioned + non-compliance)	336
(Source: CalWORKs WTW Monthly Activity Report [WTW 25/25A] Line Item 1, 3A, and 31-February 2014)	
Reengagement Plan Received Yes
Beginning Date of Reengagement	December 2013
Consortium System	C-IV

Data/Statistics Available at Time of Field Monitoring Visit:

- At the time of the visit, the county had not started keeping SB 1041 related statistical data

Summary of Documents provided by San Benito County during visit:

- San Benito County Welfare-to-Work Handbook

County Administrator and Caseworker Interviews

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 San Benito County staff regarding SB 1041 implementation. The tools were provided to San Benito County in advance of the visit. The interview panel consisted of three CDSS staff and two San Benito County staff. The interviews were conducted by one team of two CDSS staff members, and one single CDSS staff member interviewing one San Benito County 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]

San Benito County issued the WTW 24-Month Time Clock General Informing Notice (CW 2205) through the C-IV system. The (CW 2205) was first distributed to clients November 11, 2012 and thereafter as required. Beyond the (CW 2205) general informing notices, San Benito County utilized the reengagement process and recertification time period as the avenue to contact clients for their comprehensive discussions.

San Benito County completed their comprehensive discussions by December 1, 2013 on all active cases for clients who had less than or equal to 24 months left on their CalWORKs 48 month time limit as of January 1, 2013.

For clients who had more than 24 months left on their CalWORKs 48 month time limit as of January 1, 2013, clients visited the county office and met with county staff and proceeded to sign the new WTW 2 plan. However, during the time of the visit the county had not developed a tracking process that noted the number of clients who had 24 months left on their CalWORKs 24 month clock. San Benito County anticipated the completion of comprehensive discussions the later part of December 2014. During the time of the visit, the county indicated that some clients were choosing to complete less hours. However, San Benito reported that most clients chose to continue with their same WTW plan while attending school or work.

Clients who failed to attend SB 1041 appointments

San Benito County's actions towards clients who were unresponsive to county contact varied depending on the client specific case situation. For unresponsive clients, San Benito County continues outreach efforts to get clients who had failed to attend appointments rescheduled or and/or determine reason for not attending appointments. The county conducted two to three phone calls, sent appointment letters and, on occasion, performed unannounced home visits in order to determine why they were not responding to county communication efforts to reengage into the CalWORKs program. Per county procedure, clients in noncompliance and in danger of falling into sanction status received an unannounced home visit.

While out of the office conducting home visits, county staff may routinely consolidate home visits within neighboring areas to make best use of county staff time. Historically within San Benito County, sanction cases were managed separately, however during the time of the one day county visit, the county had changed operational procedures and combined sanction cases into the ICW ongoing case load.

General Comments

The CalWORKs eligibility role is handled by San Benito County Intake Unit which responsibilities include determining client eligibility. The ICWs specialize in CalWORKs continuing cases, in addition to WTW cases. ICWs caseload average approximately 50 cases and also manage ARCO cases. Caseloads are typically divided fairly evenly among ICWs. Responsibilities include the areas of job readiness workshops, appraisals, assessments, job search, work experience (WEX) and tracking client hours.

San Benito County strategy for completing necessary comprehensive discussions with clients was performed via scheduling ongoing appointments and utilizing SAR 7 reports the order which clients were contacted was determined based on individual caseworker and supervisor strategies. The county obtains client time clock information from C-IV system in

order to determine which clients are in still need of receiving their comprehensive discussions.

New Young Child Exemption

San Benito County had some clients choose to take the New Young Child Exemption. In addition, some clients chose to preserve their exemption for future use. During the time of visit, San Benito County noted 25 clients who utilized their once in a lifetime exemption.

Clients with Good Cause for Lack of Supportive Services

San Benito County did not use the lack of funding for supportive services with a CalWORKs 48-month time limit exemption.

The New WTW Activity Assignment Plan (WTW 2) Form

The new WTW Plan Activity Assignment (WTW 2) Form was made available via the CDSS website December 2012. In January 2013, San Benito County utilized the new WTW 2 by printing the form manually from the CDSS website and adding it to the San Benito County orientation packet provided to clients.

General Comments

Caseworkers noted that the new version of the WTW 2 with client signature requirement throughout the document allows for an additional avenue of ensuring clients understood what was being discussed and stated to them pertaining to WTW hourly requirement and supportive services. Caseworkers also noted that most clients seemed to understand the new WTW 2 once it is thoroughly explained to them by their worker.

Caseworkers mentioned that the WTW 2 limited space for comments section was challenging as it does not provide enough notation area to adequately reflect all the relevant information workers would like to note pertaining to client's situation.

Reengagement Process

San Benito County's reengagement efforts began in December 2013. In anticipation of the reengagement process, caseloads were reviewed for families who were previously exempt. Case managers reviewed active cases for exempt families that no longer met exemption criteria under SB 1041. Case managers sent appointment notices requesting clients come into the San Benito County office or conducted phone calls explaining reengagement and exemptions under new requirements to clients. During time of one day visit, San Benito County was still in the process of reengaging clients.

San Benito County's Reengagement Sequencing Plan is as follows:

- **December 1, 2013** - First, self- engaged clients – clients who would like to re-engage in CalWORKs program before the county process begins
- **January 1, 2014** - Second group based on redetermination date and third group based on SAR 7

For clients not seen during the sequencing group plan developed within the county, those remaining clients would receive another CW 2206 which would be scheduled accordingly. San Benito County anticipates completing all exemption participants by December 31, 2014.

Implementation Strategies

San Benito County implementation strategy consisted of informing staff of SB 1041 related program changes by providing staff correspondences materials covering SB 1041 requirements, evaluating and determining internal operational policy and procedure updates needed and performing weekly meetings as a way to disseminate information to staff. San Benito County management staff gathered some additional insight on SB 1041 requirements through participation in the 2013 CalWORKs Training Academy put on by the CDSS covering various CalWORKs topics including, but not limited to, SB 1041. The CDSS SB 1041 All County Letters (ACL) were distributed to county staff in order to allow staff to become familiar with SB 1041 requirements and one to two hour weekly meetings with ICW staff were conducted as part of the SB 1041 training and implementation process.

San Benito County has made some strides in implementing SB 1041 changes, however the county should continue their approach and further review and update, where needed, CalWORKs WTW forms and client informational materials (i.e. WTW Handbook, self-appraisal tool etc.) to ensure information provided to clients is updated in addition to terminology of many of the populations served. Although the WTW handbook had been updated in some sections to include SB 1041 requirements, the county should further review the hours of participation section covering two-parent households to ensure hourly requirement noted within WTW handbook are reflective of current requirements as noted in ACL 12-67 "hourly requirements can be met by one adult or through a combination of both adults' participation hours (core hours can be shared)." The use of the term "non-citizen" to denote immigrant could provide a more inclusive positive nature for client on self-appraisal tool as opposed to use of term "alien" currently noted.

San Benito County should further assess the behavioral health services to ensure services are adequately provided to clients who may benefit most from such services. Ensuring behavioral health services are utilized to their full potential and clients have access and knowledge regarding them will improve client success in the CalWORKs program.

San Benito should continue to strive to engage clients as soon as possible once aid is granted, thus potentially lowering the approximate 45 day time period between client intake appointments to the appraisal process.

The county should also continue to explore outreach opportunities with other counties who have promising practices that may benefit San Benito County SB 1041 implementation plans. The CDSS will continue to provide support and technical assistance when possible to any reference materials that may further benefit the county in their SB 1041 implementation efforts.

The CDSS also recommends that San Benito County pay close attention to the data which is submitted through their C-IV 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) and CalWORKs WTW Monthly Activity Reports for All (Other) Families and Two Parent Families (WTW 25/25A). The county should ensure that processes are in place to verify that data submitted via C-IV that accurately reflects clients time clock information. In addition, the county should ensure Enterprise II Lite (E2Lite) data reporting is current as well. These data sources are relied upon heavily by the CDSS to track and measure program progress. During the time of the visit, the county management was in the process of determining additional resources needed to continue their SB 1041 implementation efforts, this will contribute significantly to the county efforts to further implement SB 1041 requirements and enhance the CalWORKs WTW program to increase likelihood of client success within the program.

Case Reviews

The CDSS field monitoring team reviewed five cases selected by San Benito County in advance of the visit. The purpose of this component of the visit was to review how SB 1041 program changes were being integrated into case management, to understand how SB 1041 policies were being operationalized by county staff, and better comprehend case management within San Benito 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 (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 was in the process of or has been reengaged (if applicable).

General Comments

During the time of the one-day visit, San Benito County was developing internal processes in order to distribute the CW 2208. San Benito County uses the C-IV case management system. The following is a summary of the case findings:

- Noticing Requirements

Except for a new case initiated after January 1, 2013 and exemption case, noticing requirements for the New Rules for CalWORKs WTW Activities Informing Notice (CW 2205) were provided, the CW 2208 Your WTW 24-Month Time Clock Informing Notice client distribution process was under development during the one-day visit.

- Comprehensive Discussions and Additional Outreach

Four of the cases reviewed had received a comprehensive discussion during an in person appointment with their caseworker at the county. Journal entry notations were completed in case files.

- Welfare-to-Work Plan Activity Assignment (WTW 2) Form

All five case files reviewed used the new WTW 2.

- Sanction Case

The sanction case reviewed was for two-parent household. The client did not change their WTW plan, the sanction was lifted due to the client employment status. The strategy for engaging the client during the sanction process was primarily via phone calls and letters. The Learning Disabilities Screening tool was completed during the appointment period. The client was eligible for the new young child exemption, however they did not use the exemption option.

- Reengagement Case

The reengagement case reviewed met all reengagement noticing requirements, including the "Young Child Exemption Ends December 31, 2012 - New Rules for CalWORKs WTW Activities" (CW 2206), and the timelines for the secondary contact/appointment, third contact reminder, etc. The client became fully reengaged back into the WTW program as of July 2013.

- New Young Child Exemption

The client received the comprehensive discussion by appointment. The case reviewed was eligible and client chose to use the New Young Child Exemption. The new WTW 2 was used.

Conclusion

Successes

San Benito County's new leadership and commitment to building upon the foundation of existing CalWORKs services contributed significantly to the implementation of SB 1041 requirements within the county. San Benito involvement and participation at the County Welfare Directors Association (CWDA) conference and CDSS County Advisory Team (CAT) meetings were additional avenues that contributed to the county's upfront understanding of the SB 1041 changes and allowed management to further strategize on SB 1041 implementation within the county. The county had started assessing all their resources and internal CalWORKs operational procedures to determine appropriate use of staff and determine the potential development and implementation of a Program Integrity Unit. The county maintained weekly meetings to share and disseminate information to staff on SB 1041 requirements. San Benito actively outreached to external resources such as UC Davis for assistance with SB 1041 implementation training and also partnered with neighboring counties for implementation assistance.

Challenges

San Benito County found that one of their greatest challenges was the limited time frame allowed for SB 1041 implementation, including the June 30, 2013, deadline established to complete outreach to all transitioning WTW clients. Unfortunately, the county was unable to make this deadline. Staff shortage and SB 1041 training opportunities of current staff curtailed some progress towards SB 1041 implementation. Client data tracking pertaining to SB 1041 and client notification such as CW 2208 was in the development process during the time of the visit. In addition, continued updating and development of various client materials were still under development and/or in need of further review for updating. The county also struggled with maintaining consistent accurate reporting of data in Enterprise II Lite (E2Lite).

During time of visit, additional requests by management for staff had been initiated administratively. The delay in the issuance of instruction by the CDSS was also a hardship; the continued issuance of Question and Answer All County Letters to clarify policy has been beneficial.

Key Recommendations

As San Benito County continues its implementation strategy, the county should continue developing and implementing policies and procedures along with formal staff SB 1041 training that will ensure compliance with SB 1041 requirements. San Benito County should assess behavioral health services to ensure services provided to clients who may benefit from assistance and enhance their success in CalWORKs program.

San Benito should continue to strive to engage clients as soon as possible once aid is granted, thus potentially lowering the approximate 45 day time period between client intake appointments to the appraisal process.

As San Benito County continues implementing SB 1041 changes, the county should also take the opportunity to review and update, where needed, CalWORKs WTW forms and client informational materials (i.e client orientation materials, self-appraisal tool etc.) to ensure information provided to clients is up-to-date. Although the WTW handbook had been updated in some sections to include SB 1041 requirements, the county should further review the hours of participation section covering two-parent households to ensure hourly requirement noted within WTW handbook are reflective of current requirements as noted in ACL 12-67 “hourly requirements can be met by one adult or through a combination of both adults’ participation hours (core hours can be shared.)” Also the county should continue to explore outreach opportunities with other counties who may have promising practices that may benefit San Benito County remaining SB 1041 implementation plans.

San Benito should collect data on their progress of SB 1041 implementation, specifically information related to what sort of participation options clients are opting to take advantage of (WTW 24-Month Time Clock or CalWORKs federal standards). In addition to completing the implementation and distribution process of CS 2208. The CDSS also recommends that San Benito pay close attention to the data which is submitted through their C-IV 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). In addition, the county should ensure E2Lite data reporting is current. These sources are relied upon heavily by the CDSS to track and measure program progress.

San Benito’s outreach partnership efforts with other counties should continue in order to strategize on processes and procedures which may be beneficial in assisting San Benito meet current and future SB 1041 implementation strategy to enhance program better serve the client.

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