

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

San Diego County

Visit Date: October 8, 2013

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

San Diego 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 former 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

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

The one-day field visit was performed in San Diego County on Tuesday, October 8, 2013 at the County of San Diego Health and Human Services Agency in San Diego, CA. The field visit team included three CDSS staff along with the county's Agency Director, Workforce Services Chief, two WTW Program Managers, and three WTW Program Specialists. Additionally, representatives from the two vendor agencies contracted through the county to provide WTW case management and workforce services, Public Consulting Group (PCG) and ResCare, respectively, were present. These vendor representatives were the ResCare Deputy Director and two ResCare case managers; as well as the PCG Program Director, PCG Assistant Program Director, a PCG Assessment Specialist, and a

PCG Employment Training Advisor. The field visit consisted of a kick-off meeting, close-out meeting, staff interviews, and case management observations with county staff.

Implementation Strategies

San Diego County updated their CalWORKs Program Guide for use by Eligibility and Employment Services staff and additionally provided training on the following topics: new participation hours, the WTW 24-Month Time Clock, new Young Child Exemption, and Reengagement of previously exempt clients. These trainings were conducted in-person and via Web-ex (on-line). This information was additionally shared with community partners and stakeholders at meetings and via email, including advocates, community colleges, and refugee programs.

Letter and notices were sent to clients informing them of changes to the CalWORKs program and Line Staff reviewed new changes with clients via comprehensive discussions, visual aids and other client-discussion tools including, desk aids, program reminders, and policy memos. At least monthly meetings were held with ResCare, PCG, and key Eligibility staff to ensure on-going communication and understanding and to ensure that tasks were completed in a timely manner.

San Diego County focused on the reengagement of clients who met the AB x4 4 exemption criteria early and has prioritized notification of clients based on time left on clients' 48 month time clock, with those with the least amount of time remaining being first in the reengagement queue. Clients are given the option to begin or continue volunteering until the county's reengagement timeframes are complete, including all proper client noticing and discussions.

San Diego County's training materials and other written guidance were provided to CDSS and aligned with SB 1041 implementation instructions issued by CDSS. Although San Diego County had developed their training material prior to the training material provided by CDSS through All County Information Notice I-08-13 to ensure timely implementation, the two training packages were compared by the county and some minor variations were adjusted.

Successes

San Diego County's overall implementation of SB 1041 was very successful and included utilization of large amounts of guidance provided in incremental, understandable pieces. The increased frequency of meetings with external stakeholders and internal leaders resulted in the free-flow of information and input, leading to collaborative and effective implementation of SB 1041 program changes and tasks. San Diego County's welfare-to-work service model with the vendors PCG and ResCare is conducive to a focused welfare-to-work program and applied, knowledgeable employment service workers. San Diego County made policy changes related to the allowance of study time for clients which is a positive development in light of the new flexibility allowed for by the WTW 24-Month Clock and will be beneficial to San Diego County's student population as well as a new streamlined policy for approving student school supplies (e.g. books). San Diego County's early focus on reengagement is positive and makes effective use of clients' time on aid. It was noted during the case file reviews that thorough notes were being entered into client files via the CalWIN automated system and the document imaging system for the eligibility section in the

county. CDSS was pleased to learn the San Diego County is considering implementation of an expanded subsidized employment program.

Key Recommendations

San Diego County should continue to strategize in ways to complete the Your Welfare-to-Work (WTW) 24-Month Time Clock Notice (CW 2208) and automating current manual mechanisms for tracking clients' WTW 24-Month Time Clock. The county should continue sanction outreach in order to have comprehensive discussions with this client population.

San Diego County should continue their positive collaboration with community colleges in order to maximize appropriate educational activities with the WTW 24-Month Time Clock.

CDSS supports the continued streamlining of processes between the county, the vendors PCG and ResCare, and community colleges to minimize delays in the issuance of supportive services to students and other clients. San Diego County is scheduled to implement Co-location of Employment Services Welfare to Work staff in our Community Colleges in Fall of 2014 as a collaborative effort to deliver quality service to our common customers, enhance the customer experience and improve outcomes for all parties through streamlined processes, stronger relationships, clear communication, professionalism, courtesy and partnership.

Continued improvement of sanction outreach efforts is encouraged. A monthly report and reminder is sent to Employment Service Contractors. Program Staff monitor activity.

Acknowledgments

CDSS thanks San Diego County for hosting the field monitoring visit. CDSS appreciates the open collaboration with San Diego County staff to ensure the continued success of the CalWORKs program.

Field Monitoring Visit Summary

Introduction

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General Comments

San Diego County's service delivery system is organized into six geographic service regions overseen by Regional General Managers who are responsible for planning and managing the delivery of a variety of government-delivered health and social services. This integrated structure allows for public health nurses, mental health workers, social workers, and welfare workers to serve clients in an integrated fashion. San Diego County has twelve offices and employs many innovative strategies to focus on a "no wrong door" approach for clients seeking services, including call centers and lobby management systems/kiosks.

Background and Data

San Diego County at-a-glance

Total Caseload.....	29,315
(Source: CalWORKs Cash Grant Caseload Movement Report CA 237 CW Line Item 8-July 2013)	
WTW Enrollees.....	11,252
(Source: CalWORKs Welfare-to-Work Monthly Activity Report WTW 25/25A Line Item 1-July 2013)	
Mandatory Participants (enrollees + sanctioned + non-compliance).....	13,291
(Source: CalWORKs Welfare-to-Work Monthly Activity Report WTW 25/25A Line Item 1, 3A, and 31-July 2013)	
Reengagement Plan Received.....	Yes
Beginning Date of Reengagement.....	June 1, 2013
Consortia System.....	CalWIN

Data/Statistics

CDSS requested data in advance of the County Field Monitoring Visit. The following data was provided by the county (all numbers approximate):

- Clients who had more than 24 months left on their CalWORKs 48-month time limit as of January 1, 2013, that have had their comprehensive discussion: **5,184**
- Clients who had less than 24-months or equal to 24 months left on their CalWORKs 48-month time limit as of January 1, 2013, that have had their comprehensive discussion: **4,187**
- Sanctions that were cured as a result of SB 1041: **192**
- Former short-term young child exempt clients (Assembly Bill [AB] X4 4) that have been reengaged: **132**
- Number of WTW plans that changed as a result of SB 1041 implementation: **7,907**
- Clients that have used the new once in a lifetime young child exemption: **127**

Summary of Documents provided by San Diego County

- San Diego County SB 1041 miscellaneous informational emails and staff memorandums regarding noticing of clients and implementation instructions to staff.

- SB 1041 related training materials including PowerPoint presentations and handouts on various SB 1041 topics.
- SB 1041 tools and other county specific materials including desk aids.
- Departmental Memorandum and Communications.
- San Diego County's Assembly Bill (AB) X4 4 Short-Term Exemption County Reengagement Sequencing plan.

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 county administrator and case workers in-person regarding SB 1041 implementation. The tool was provided to the county administrator and caseworkers in advance of the visit. The administrator interview panel consisted of four CDSS staff with three county administrators. The caseworker interviews were conducted by two teams of two CDSS staff members with each team interviewing one caseworker.

Summary of Observations

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

San Diego County issued the initial WTW 24-Month Time Clock General Informing Notice (CW 2205) November 28, 2012, with a second issuance of the notice on December 7, 2012 to correct a typo. Following the issuance of this notice, the county began comprehensive discussions with clients via phone, mail or in person beginning January of 2013, and as of the date of the visit was still reaching out to some sanctioned clients. New and existing clients continue to receive the comprehensive discussion. Completion of the comprehensive discussions was tracked using ad-hoc tools, and manual reviews. San Diego County is currently discussing necessary process and procedural changes to introduce employment cases into their document imaging system, CalWIN Electronic Records System (CERMS) . Employment Worker staff are instructed to include documentation of the comprehensive discussion in case notes.

San Diego County and the vendors ResCare and PCG strategy for completing all necessary comprehensive discussions included deadlines per case type (e.g., active, noncompliant, etc.), weekly progress reporting and monthly target to track completion of comprehensive discussions within their caseloads. Supervisors were responsible for monitoring staff progress on comprehensive discussions and appropriate timeframes for noticing. All clients were scheduled for a re-assessment appointment over specified time periods in order to complete comprehensive discussions in person or by phone. WTW 24-Month Time Clock desk aids and checklists were tools used to complete the comprehensive discussions. San Diego County has concentrated their efforts on having the comprehensive discussions and on completing the reengagement process. At the time of the visit, 192 sanctions had been cured as a result of SB 1041. At that time, not all sanctioned clients had received a comprehensive discussion but outreach was continuing.

During the caseworker interviews, ResCare and PCG employment caseworkers were asked about and displayed understanding of weekly participation requirements, changes to core/noncore

hours, how the client's choice of activity may affect his or her WTW 24-Month Time Clock, and how cash aid may be lowered if the client is not meeting core participation hours once his or her WTW 24-Month Time Clock has expired. Discussions during the caseworker interviews also revealed an understanding of the different types of exemptions, including the once in a lifetime young child exemption, care of a first child exemption, and subsequent child exemptions. ResCare and PCG caseworkers discussed the option of using the care of a first child exemption, if eligible, instead of the young child exemption if the client is planning on expanding their family. ResCare and PCG staff noted that clients are motivated by the lowered hours and elimination of core/non-core activities, especially clients in community college and vocational education.

A typical case manager in San Diego County carries roughly 90 to 100 cases and is required to speak with their clients at least monthly.

In general, more clients chose to change activities while fewer clients chose to reduce their hourly participation requirements as a result of the program rules. Clients who were working frequently chose not to reduce their hours.

General Comments

San Diego County encouraged clients to maximize their WTW 24-Month Time Clock by meeting federal work requirements.

Clients who failed to attend SB 1041 appointments

Clients meeting new participation requirements who failed to respond to the county's request to discuss the SB 1041 changes received additional contact(s) by the Employment Specialists. San Diego County used several methods of outreach including letters, phone calls (including the use of auto-dialer technology), as well as setting up formal appointments. Approximately 10% of clients could not be reached for the comprehensive discussion however, the county continues to outreach to this population and expected completion of the discussion to occur shortly after the time of the visit. These clients are sent an informing notice with an option to request an appointment. The WTW Plan Activity Assignment Sheet (WTW 2) is sent to clients meeting federal requirements with a request that they sign the plan within 30 days. Additional information is provided to unresponsive clients who are not meeting federal requirements, including the Welfare-to-Work 24-Month Time Clock Notice (WTW 38) and any necessary follow-up calls. The non-compliance process is initiated when appropriate.

General Comments

Intake workers schedule WTW orientations within 30 days of approval for aid, with this appointment occurring most often (75 percent of cases) within 15 days. Cases are referred to an "assignment bank" to be assigned to either a ResCare or PCG case worker depending on location in the county, known as a case counselor. PCG provides supportive services in-house, while ResCare has sub-contractors for supportive services. Both vendors are co-housed with the county Behavioral Health Department whose staff perform client

assessments. Both vendors report all client activity through the direct access to the CalWIN system.

New Young Child Exemption

San Diego County had 127 clients choose to take the new once in a lifetime young child exemption. Some clients chose to preserve this one time exemption to use in the future. Clients that chose the new once in a lifetime young child exemption were offered the opportunity to volunteer to participate.

Clients with Good Cause for Lack of Supportive Services

San Diego County provides supportive services to all participants, therefore did not have a need to claim good cause for lack of those services.

The new WTW Activity Plan/Form (WTW) 2

The new Welfare-to-Work Plan Activity Assignment (WTW 2) form was made available via the CDSS website December of 2012. San Diego County used the previous version available through the CalWIN consortium system with required notation until the revised version became available January or February of 2013. In general, county staff used the Welfare-to-Work Activity Assignment (WTW 2) as a tool to explain the activities available under the WTW 24-Month Time Clock and the CalWORKs Federal Standards.

General Comments

San Diego County felt that the Welfare-to-Work Plan Activity Assignment (WTW 2) generally helps clients differentiate between CalWORKs vs. CalWORKs Federal standards serving as a visual aid. Some concerns were expressed about the length of the form and size of the font. In general, the detail in the form and the supportive services page were found to be helpful.

Reengagement Process

San Diego County began reengaging all AB X4 4 clients on June 1, 2013. San Diego County's Sequencing Plan is as follows:

- **June 2013**-Clients with less than six months on their 48-Month CalWORKs time clock.
- **September 2013**- Clients with 24 or less months on their 48-Month CalWORKs time clock.
- **December 2013**- Clients with more than 24 months on their 48-Month CalWORKs time clock.

The reengagement process for San Diego County includes the following:

- Allowing clients that request to reengage ahead of when they were scheduled to be reengaged to reengage after providing the client with the comprehensive discussion and required notices as well as informing clients about the non-compliance and sanction process. Clients are also

informed that if they choose to reengage early they will no longer be exempt unless they qualify for another exemption.

Implementation Strategies

San Diego County updated their CalWORKs Program Guide for use by Eligibility and Employment Services staff and additionally provided training on the following topics: new participation hours, the WTW 24-Month Time Clock, new Young Child Exemption, and Reengagement of previously exempt clients. These trainings were conducted in-person and via Web-ex (on-line). This information was additionally shared with community partners and stakeholders at meetings and via email, including advocates, community colleges, and refugee programs.

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San Diego County focused on the reengagement of clients who met the AB x4 4 exemption criteria early and has prioritized notification of clients based on time left on clients' 48 month time clock, with those with the least amount of time remaining being first in the reengagement queue. Clients are given the option to begin or continue volunteering until the county's reengagement process is complete, including all proper client noticing and discussions.

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Case Reviews

The CDSS Field Monitoring Team reviewed five cases selected by San Diego County in advance of the visit. The purpose of this component of the visit is to review how SB 1041 program changes are being integrated into case management, understand how SB 1041 policies are being operationalized by the caseworker, and better comprehend case management within the 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 is sanctioned that has earnings and is curable based on the new participation requirements (may be a case actually cured since January 1, 2013 based on new participation requirements); and
- Case Five-a client that is part of the former short-term young child exemption (AB X4 4)/ reengagement population, and is currently in the process of or has been reengaged.

General Comments

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

- Noticing Requirements: All noticing requirements were met including the New Rules for CalWORKs Welfare-to-Work Activities Informing Notice (CW 2205) and Your Welfare-to-Work (WTW) 24-Month Time Clock Notice (CW 2208).
- Comprehensive discussions and additional outreach: All required comprehensive discussions were completed.
- Learning Disability Screening was offered to five out of five cases reviewed.
- Welfare-to-Work Plan Activity Assignment (WTW 2)
 - All case files with plans developed on or after January 2013, used the new Welfare-to-Work Plan Activity (WTW 2).
 - All plans were complete and included supportive services to be provided to the clients.
- New Young Child: One case reviewed chose to take the new young child exemption and all requirements were met.
- Reengagement: The Reengagement case included the comprehensive discussion conducted in April of 2013, and the issuance of the Your Welfare-to-Work (WTW) 24-Month Time Clock Notice (CW 2208).

Conclusion

Successes

San Diego County's overall implementation of SB 1041 was very successful and included utilization of large amounts of guidance provided in incremental, understandable pieces. The increased frequency of meetings with external stakeholders and internal leaders resulted in the free-flow of information and input, leading to collaborative and effective implementation of SB 1041 program changes and tasks. San Diego County's welfare-to-work service model with the vendors PCG and ResCare is conducive to a focused welfare-to-work program and applied, knowledgeable employment service workers. San Diego County made policy changes related to the allowance of study time for clients which is a positive development in light of the new flexibility allowed for by the WTW 24-Month Clock and will be beneficial to San Diego County's student population as well as a new streamlined policy for approving student school supplies (e.g. books). San Diego County's early focus on reengagement is positive and makes effective use of clients' time on aid. It was noted during the case file reviews that thorough notes were being entered into client files via the CalWIN automated system. San Diego County is discussing necessary process and procedural changes to introduce employment cases into their document imaging system, CalWIN Electronic

Records System (CERMS). CDSS was pleased to learn the San Diego County is considering implementation of an expanded subsidized employment program.

Challenges

San Diego County noted several challenges related to the implementation of SB 1041. These challenges included the timing of automation changes in order to keep up with ongoing flow, and sometimes untimely, release of state guidance via the implementing All County Letters. Additionally, the county noted that the format of state guidance, specifically the follow-up “Question and Answer” letters that included guidance on several topics, would be preferred in categorical fashion or with a table of contents. The county found that the automation of the WTW 24-Month Time Clock tracking was a challenge.

The county/vendor procedures for issuance of supportive services to clients includes required communication between the county and the vendor that can at times be time-consuming. As noted in the “Success” section above, San Diego County has changed their policy for approving student school supplies (e.g. books) in order to have a more efficient process that takes less time.

San Diego County continues to strive for a balance between achieving positive employment outcomes for clients and in so doing attaining work participation rate targets, and the inherent tension with CalWORKs rules which are not always conducive to those goals in the short-term. This issue is especially challenging in San Diego County in part due to the large refugee population there.

Key Recommendations

San Diego County should continue to strategize in ways to complete the Your Welfare-to-Work (WTW) 24-Month Time Clock Notice (CW 2208) and automating current manual mechanisms for tracking clients’ WTW 24-Month Time Clock. The county should continue sanction outreach in order to have comprehensive discussions with this client population.

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Contact

Damien Ladd, *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) 654-1451
Email: Damien.Ladd@dss.ca.gov