



CDSS

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September 8, 2016

ALL COUNTY INFORMATION NOTICE NO. I-57-16

REASON FOR THIS TRANSMITTAL

- State Law Change
- Federal Law or Regulation Change
- Court Order
- Clarification Requested by One or More Counties
- Initiated by CDSS

TO: ALL COUNTY WELFARE DIRECTORS
 ALL CALWORKS PROGRAM SPECIALISTS
 ALL COUNTY WELFARE-TO-WORK COORDINATORS
 ALL COUNTY REFUGEE COORDINATORS
 ALL COUNTY CONSORTIA PROJECT MANAGERS
 ALL CHILD CARE COORDINATORS

SUBJECT: CALIFORNIA WORK OPPORTUNITY AND RESPONSIBILITY TO KIDS (CalWORKs) EDUCATION AND TRAINING SUPPORTIVE SERVICES AND VERIFICATION IN THE WELFARE-TO-WORK (WTW) PROGRAM

REFERENCES: ALL COUNTY LETTER (ACL) [15-64](#); ALL COUNTY INFORMATION NOTICE (ACIN) [I-49-09](#); MANUAL OF POLICIES AND PROCEDURES (MPP) SECTIONS 19-001, 19-002, 42-711.8, 42-750, 42-750.2

The purpose of this notice is to remind County Welfare Departments (CWDs) of the policy (or policies) regarding the assignment of supportive services and the verification requirements for education activities in the CalWORKs program. This guidance only applies to education activities assigned as part of a welfare-to-work (WTW) plan, both for participation under the WTW 24-Month Time Clock (CalWORKs minimum standards), and CalWORKs federal standards. Reporting for the federal Work Participation Rate is governed by California's Work Verification Plan, transmitted in [ACL 15-64](#), and is not addressed in this notice.

WTW Plans and Supportive Services for Education Activities

When education or training activities are assigned as part of a WTW plan, the plan should include information on all classes or equivalents that are required to meet the goal of the assigned education or training program. This may include course catalogues, education plans, education hours, or other documentation provided by the education provider at the time the client enrolls. Any other education activities, including concurrent or prerequisite classes that are required by an individual's

assessment or by other activities in the WTW plan must also be included in the WTW plan. Classes that are not required by the client's program or the education provider are not required to be included in the WTW plan.

CWDs are reminded that while a WTW plan must include the client's degree or certificate program, the specific classes may not be available for incorporation into the client's WTW Plan Activity Assignment (WTW 2) prior to enrollment in those classes. Procedures for what updates or revisions may be needed to the WTW 2 to reflect the client's current education period must be consistent with CWD policies, and be structured in such a way to not interfere with the client's participation in his or her education program.

Example 1:

A client, working with the community college coordinator and CWD, has developed a WTW plan which includes a degree program at the local community college. The client's goal is to earn a certificate in Accounting. In order to achieve this goal, the client will need to complete courses required by the certificate program along with a number of elective courses required by the institution. The WTW plan is written to include all classes for the certificate, as well as those classes required by the institution for graduation.

Example 2:

As part of a degree program, a client is enrolled in a science class which requires concurrent enrollment in a math class. This requirement is documented in the education institution's course catalogue or other published document. This math class must be included in the client's WTW plan, even if it is not a specific requirement of the client's degree program.

A client is entitled to necessary supportive services for all classes included in his or her WTW plan, as outlined in Manual of Policies and Procedures (MPP) Section 42-750. This includes classes required for the client's specific program, additional classes required by the provider, and any other classes included in the WTW plan. Necessary supportive services include, but are not limited to, books, lab or materials fees, transportation, and child care services.

A client has the option to request and receive advances for any supportive services included in his or her WTW plan, as detailed in MPP Section 42-750.2. This may include payment for books, transportation, or fees and other ancillary expenses.

Example 3:

The same client in Example 2 is enrolled in a combination of courses required by their degree program and by their educational institution for graduation. The

client is also enrolled in an additional course of his or her choosing that is neither required by the degree program nor by the education institution, and, as a result, is not in the client's WTW plan. The client is entitled to supportive services for those courses that are required by their degree program, as well as those courses required by the institution. However, the client is not entitled to receive supportive services for the additional course which is not required by the degree program, is not required by the education institution, and is not part of the WTW plan. Now, if this course is incorporated into the client's WTW plan, then supportive services shall be provided by the CWD for that additional course.

Verification of Training or Education Activities

CWDs are reminded that hours of participation in education or training activities must be supported by documentation in the case file, as part of the satisfactory participation requirements of MPP Section 42-711.8. Documentation to substantiate hours of participation may consist of, but is not limited to, classroom time sheets, attendance records, and similar documentation made available by the service provider and/or client and maintained in the case file.

For example, a time sheet may include the following information:

- Name of client;
- Name of service provider;
- Number of hours of participation;
- Name and telephone number of person verifying hours; and
- Signature of the person verifying hours, such as CWD staff, service provider, or other responsible party.

Other forms of verification could include enrollment verification from the service provider that includes the hours a client is participating in the education or training program. In this case, verification for education and training activities is a confirmation that the client was enrolled in all the classes in the client's WTW plan and that their required hours of participation correspond to the individual's class schedule. Standards for satisfactory participation, including required verification, must be documented as part of a WTW plan prior to a client signing his or her plan, in accordance with MPP Section 42-711.8.

Example 4:

As verification of participation, a client provides documentation on a monthly basis of a class schedule in the form of a printout that shows current enrollment in 12 semester units. This correlates with the client's WTW plan which shows an assignment of 12 hours a week in classroom activities. This client's verification would also include monthly contact with the service provider to certify that the client continued to be enrolled and was making satisfactory progress in the program.

Example 5:

Instead of a monthly printout of the class schedule, the client from Example 4 provides a class schedule for the entire semester showing four classes, each consisting of 54 hours of lecture over 18-weeks, for a total of 216 hours. This client's WTW plan would be written for 12 hours of classroom time each week (216 hours divided by 18 weeks). Monthly verification would then consist of certification by the education provider that the client continued to be enrolled and made satisfactory progress in the education program.

CWDs are reminded that CalWORKs clients are not required to seek additional verification of activities, if such verification would force disclosure of information that is confidential under MPP Section 19-002. Under this section, a client is not required to provide verification above that which is required or available to other employees, students or trainees of the organization.

Verification prohibited by this section would include requiring a client to provide teacher or instructor verification of daily attendance. Instead, the CWD may consider seeking verification through other available resources offered by the educational institution (e.g. California Community College CalWORKs coordinators).

CWDs are also reminded that "daily supervision" does not require daily in-person contact. Daily supervision can be achieved by telephone or electronic methods, as appropriate. It is expected that the responsible party has daily responsibility for oversight of the individual's participation. This may or may not include daily contact/communication with the client.

Effective Local Partnerships for Documenting and Verifying Participation

More than one method of documentation can be used to record the actual hours of participation in educational activities, provided that the documentation meets the requirements outlined above. Local methods may vary to reflect operational conditions such as campus layout, the use of automated systems, local means for verifying distance-based learning, types of academic or vocational programs, and partnership agreements between CWDs and community colleges.

CWDs should work with their local service providers, including the community colleges, to determine what means of verification is most appropriate for clients. CWDs must also ensure that any methods of verification used meet the requirements detailed above.

As CWD's work with local partners, care must be taken to ensure that the privacy of WTW clients, as well as the confidentiality of their personal information, is respected. CWDs and local partners are encouraged to remind staff about confidentiality requirements for clients receiving public assistance, and remind clients that they do not

have to disclose personal information about their participation in the CalWORKs program to instructors or other non-CalWORKs staff. MPP Sections 19-001 and 19-002 provide further guidance on the confidentiality and privacy of CalWORKs recipients.

The California Department of Social Services (CDSS) urges CWDs and California Community Colleges to continue working together to ensure that CalWORKs clients' enrollment and progress at community colleges are accurately documented, verified, and maintained in the case file on a monthly basis. A list of Community College CalWORKs regional representatives can be found at the California Community Colleges Chancellor's Office website under [Local Program Contacts](#).

CDSS also encourages CWDs to share any best or promising practices through the [CalWORKs best practices website](#) described in [ACIN I-49-09](#). Examples of promising practices include information sharing between CWD and community college CalWORKs coordinators, stationing of CWD caseworkers at community college sites, or using a client's community college Student Education Plan to assist in developing the WTW plan.

If you have any program policy questions regarding the information in this letter, please contact your CDSS Employment Bureau county consultant at (916) 654-2137.

Sincerely,

Original Document Signed By:

KÄREN DICKERSON, Chief
CalWORKs Employment and Eligibility Branch