

DEPARTMENT OF SOCIAL SERVICES

744 P Street, Sacramento, CA 95814



REASON FOR THIS TRANSMITTAL

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

November 9, 2006

ALL-COUNTY INFORMATION NOTICE NO. I-81-06

TO: ALL COUNTY WELFARE DIRECTORS
 ALL COUNTY FOOD STAMP COORDINATORS
 ALL COUNTY FOOD STAMP EMPLOYMENT
 AND TRAINING COORDINATORS

SUBJECT: FEDERAL FISCAL YEAR 2007 PLAN GUIDELINES FOR COUNTIES
 PARTICIPATING IN THE FOOD STAMP EMPLOYMENT AND
 TRAINING PROGRAM

REFERENCE: MANUAL OF POLICIES AND PROCEDURES,
 DIVISION 63, SECTIONS 63-407

The purpose of this letter is to transmit the Federal Fiscal Year (FFY) 2007 guidelines and template for the Food Stamp Employment and Training (FSET) program. Twenty-four counties have indicated their intent to operate FSET in FFY 2007 (please refer to ACIN I-76-06, FSET 100 percent funds allocation for FFY 2007). As required by the Federal Food and Nutrition Service (FNS), counties must complete an annual FSET Plan as specified in the Manual of Policies and Procedures (MPP) Division 63, section 63-407.842.

The California Department of Social Services (CDSS) has taken several steps to simplify the task of completing FSET county plans. The FSET guidelines have been revised and shortened and now consist only of instructions for completing the plan and program definitions. The definitions section of the FSET guidelines has been reorganized and revised to provide explanation of program terms. It is recommended that counties review the definitions section before preparing their FSET plan. An understanding of the terms used in the FSET plan will aid in completing the various parts of the plan. A separate FSET plan template with brief instructions preceding each entry is provided for county use. Use of the template should make the task of completing FSET plans less cumbersome and will expedite CDSS review of the plans.

Counties should complete each section of the FSET plan template. If certain optional provisions of the FSET plan, such as county contract requirements are not relevant to the county's FSET program, counties should note that these provisions are not applicable.

It is important that counties provide accurate plan estimates of their work registrant and Able-Bodied Adult Without Dependents (ABAWD) populations for FFY 2007. Counties

should be able to use the data from their most recent statistical report forms, STAT 47 and 48, to develop estimates for their FSET plans.

Counties are reminded that FNS utilizes the data from the Stat 47 and 48 forms to determine each state's future allocation of FSET funds and the 15 percent ABAWD exemptions. Therefore, it is important that counties report data on the STAT 47 and 48 reports in an accurate and timely fashion.

A Microsoft Word version of the FSET plan template will be e-mailed to counties immediately following issuance of this ACIN. All counties offering an FSET program should inform CDSS within one week of the issuance of this ACIN if they did not receive a Microsoft Word copy of the plan template. Those counties that did not receive an e-mailed copy of the template should e-mail updated contact information to CDSS including the name, title, address, fax, telephone, and e-mail address of the individual that will be responsible for preparing the FSET plan. Please alert Alicia Thomason or Robert Nevins of the Food Stamp Branch as to whether your county receives a Microsoft Word version of the FSET template. Alicia can be reached by telephone at (916) 657-2630 or by e-mail at the following address: alicia.thomason@dss.ca.gov. Robert can be reached at the telephone number or e-mail address listed below.

The deadline for submitting your county's FSET Plan is December 15, 2006. Please forward an electronic copy in Microsoft Word and mail a signed hard copy to the following CDSS staff:

ATTN: Mr. Robert Nevins, Food Stamp Analyst
California Department of Social Services
Food Stamp Branch
744 P Street, M.S. 16-32
Sacramento, CA 95814

E-mail: robert.nevins@dss.ca.gov
Fax: (916) 657-1295

If you have questions regarding the Food Stamp Work Registrant, ABAWD, and FSET Program Caseload Report, STAT 47 and STAT 48, please contact Mark Sticklin of the Data Systems and Survey Design Bureau at (916) 654-1273. If you have any questions about this letter, or the submittal of your plan, please contact Robert Nevins, Food Stamps FSET Analyst, at (916) 654-1408 or Randy Shiroy, Manager, at (916) 654-1435.

Sincerely,

Original Document Signed By:

RIGHTON YEE, Chief
Food Stamp Branch

Attachment

**FOOD STAMP EMPLOYMENT AND TRAINING (FSET)
PROGRAM HANDBOOK FOR FEDERAL FISCAL YEAR 2007**

**GUIDELINES FOR PREPARING COUNTY FSET PLANS
(October 1, 2006 – September 30, 2007)**



**Prepared by the
California Department of Social Services
Food Stamp Branch**

Table of Contents

INTRODUCTION	pg 4-5
Plan Preparation and Submission	
FSET Fund Limitations	
Work Registrant and ABAWD Estimates	
FSET Plan Modification	
PART I-A SUMMARY OF COUNTY FOOD STAMP EMPLOYMENT AND TRAINING PROGRAM	pg 6-7
Abstract of the County FSET Program	
Program Changes	
Program Components	
Sequencing of Components	
Other Employment Programs	
Workforce Development System	
Outcome Data	
PART I-B. FSET COMPONENT SUMMARIES	pg 7-11
Example of Component Summary	
PART II WORK REGISTRATION AND ABAWD	pg 12-13
Information	
Work Registrant Population	
Deferral Policy	
ABAWD Population	
PART III PROGRAM COORDINATION	pg 14-15
General Program Coordination	
Narrative Coordination Statement	
Information Coordination	
Coordination Time Frames	
Interagency Coordination	
Areas of Coordination	
Methods of Coordination	
Contractual Arrangements	

PART IV PROGRAM COSTS AND FINANCIAL MANAGEMENT.....pg 16-18

Planned Costs of the County FSET Program

Operating Budget

Justification of Education Costs

Participant Reimbursement

Method of Participant Reimbursement

Procedure for Participant Reimbursement

Cost Allocation

PART V PROGRAM REPORTING AND MANAGEMENT.....pg 19-20

Information

Obtaining Initial Count of Work Registrants

Ensuring an Unduplicated Work Registrant Count

Meeting Ongoing Federal Reporting Requirements

Method of Gathering Data

Local Reporting Requirement

Contact Information

TABLES.....pg 20-23

Table 1 Estimated Participant Levels

Table 1B Criteria for 15 Percent ABAWD Exemption

Table 2 Estimated FSET Component Placements and Program

Participants Table 3

Summary of Interagency Coordination for the FSET Program

Table 4 Operating Budget

Table 5 Planned Costs by Funding Category

DEFINITIONS.....pg 24-30

EXHIBIT 1pg 31

FSET Program Federal/County - Financial Participation Categories.....

EXHIBIT 2pg 32

Relationship of the Annual FSET Plan to Quarterly - STAT 47 and STAT 48 Reports and FSET Expense Claims

INTRODUCTION

The purpose of this handbook is to provide instructions for preparing the county Food Stamp Employment and Training (FSET) plan for Federal Fiscal Year (FFY) 2007. The California Department of Social Services (CDSS) must submit an annual FSET plan to the Food and Nutrition Service (FNS) for review and approval. The State's FSET plan consists of a synopsis of all the individual county FSET plans. The FSET plan must be consistent with federal Employment and Training (E&T) legislation contained in Section (6)(d) and (16)(h) of the Food Stamp Act, federal regulations in Division 7, Section 273.7 of the code of Federal Regulations (CFR) and federal E&T guidelines revised in May of 2003. State approval of individual county plans and allocation of FSET funds will be contingent upon FNS' approval of the State's annual FSET plan.

Plan Preparation and Submission

All counties must complete and submit an FSET plan to CDSS no later than December 15, 2006. Counties that will operate an FSET program must complete all sections contained in this handbook using the template for FSET counties. Counties not offering an FSET program should complete the template for non-FSET counties which is contained in ACIN I-68-06. FSET plans should be submitted using the templates developed by CDSS. This handbook follows the FSET plan template and takes a step by step approach in identifying and explaining the information counties must include in their plans.

FSET Fund Limitations

The use of FSET administrative funds is limited to the cost of planning, implementing, and operating an FSET program in accordance with an approved plan. FSET administrative funds must not be used for any of the following: determining whether an individual must be work registered; the work registration process; further screening during the certification process; disqualification activity that takes place after noncompliance without good cause is reported; subsidizing a participant's wages; and reimbursing participants for dependent care or transportation/ancillary (separate FSET budgets are provided for these costs).

Work Registrant and Able-Bodied Adult Without Dependents (ABAWD) Estimates

Estimates for work registrants, ABAWDs, and participants being served should be based on reasonably accurate projections and consistent with data reported on the Food Stamp Program Work Registrant, Able-Bodied Adults Without Dependents STAT 47 and 48 forms. In preparing your county's plan the numbers reported on various tables in the plan should be checked for consistency.

FSET Plan Modifications

If a county proposes to make any substantive change to the FSET program after its FSET plan is approved, the county must submit a plan modification. The modification request must be approved before the proposed change(s) may be implemented. The county may be liable for costs associated with the implementation of any significant change that

occurs prior to approval by CDSS and FNS. The following are examples of changes that require a formal modification of the county FSET plan:

- Major change in components (e.g., adding, deleting, or modifying a component);
- Change in the amount of expenditures expected to exceed the 100 percent FSET grant level for which the State agency will request 50 percent federal reimbursement;
- Change in the method of paying participant reimbursement.

If a plan is modified, the original plan must be edited and submitted in its entirety. A cover letter must be sent describing the proposed change(s). The pages within the plan that have been edited must be identified along with any tables that have been revised. Counties must be careful to ensure that appropriate amendments are made to all parts of the plan impacted by the proposed change. The county may want to contact CDSS for assistance in determining the affected sections.

Some changes to the county FSET plan do not require approval by CDSS. These changes include the following:

- Substitution of one contractor for another that does not affect the scope or operation of a component, or
- A change in the targeted population of a component (e.g., from illiterate adults to high school dropouts under 20 years old) that does not affect the participation levels or component cost.

Although CDSS approval is not required for these changes, counties must notify CDSS of the revisions being made using the same approach described above. It is imperative that all FSET plan revisions be reported to CDSS in a timely manner in order for CDSS to maintain accurate records.

PLAN PART I

SUMMARY OF COUNTY FOOD STAMP EMPLOYMENT AND TRAINING PROGRAM

Part I A. – Provide a narrative summary of the FSET program that the County Welfare Department (CWD) plans to implement and include the following information:

County FSET Program - Provide a brief narrative that summarizes and affords an overall perspective of the county's FSET program.

Program Changes - County FSET programs sometimes undergo changes from year to year to meet changing conditions and improve services to their food stamp work registrant populations and ABAWDs. Describe here the nature of the changes, if any, contained in the FSET plan.

Program Components - To receive approval, FSET program components must enhance the employability of individual food stamp recipients. Components may also be offered in combination such as Workfare and Job Search. Refer to the Definitions section for a brief description of FSET components.

List the components that will be included in the county's FSET program.
Discuss the weekly/monthly hours of participation required for each component.
Describe any planned combinations of components to meet the 20-hour ABAWD work requirement.

Sequencing of Components - If it is intended that a person will be placed in more than one component over the course of the FFY describe the sequence in which the components will be assigned to the participant.

Other Employment Programs - Describe other employment and training programs that serve Food Stamp, CalWORKs and General Assistance (GA) recipients. Describe how the FSET Program will interface with these other employment and training programs, including detailing the coordination between the CalWORKs Welfare-to-Work (WTW) program and FSET. If applicable, include in the description, the administrative consolidations and shared components.

Workforce Development System - Counties are encouraged to deliver their FSET components through the WIA, One-Stop System, unless their local One-Stop Center cannot provide the service or a One-Stop Center does not exist in the area. Describe the county's plans for delivering each of its FSET components through its workforce development system. If a particular component is not available locally through the workforce development system, discuss the source(s) the county will use to provide the component.

Outcome Data - Please forward with the county FSET plan:

- any outcome data such as numbers of participants entering employment, types of employment found, wage rates, etc., collected by the CWD; and
- Any evaluations or studies relating to employment and training conducted or commissioned by the county.

Plan Part I B. – Instructions for Completing the FSET Component Summaries template.

In completing this section, remember the following:

- Decimals or fractions must not be used for the number of participants or component costs. Enter only whole numbers by rounding up or down as necessary.
- Counties must not use ranges for numbers of participants (e.g., 5 - 7, 1 to 3).
- Assessment by itself is not a component/activity.
- Screening is not a component/activity.
- Volunteers and mandatory participants must both be counted in the estimates for ABAWDs and non-ABAWDs expected to participate in a component.
- The Workfare component, by itself satisfies the ABAWD work rule and hours of participation are determined by dividing the household's monthly food stamp allotment by the higher of the federal or state minimum wage.
- When a county offers 30-day job search prior to workfare, this activity must be included in the component description for workfare. The 30-day job search activity is not a separate component, but is considered part of workfare. Therefore, counties should not use a separate component template for this activity.
- When a component includes concurrent activities, the component name must reflect all the activities associated with that component (e.g., Work Experience, OJT, Alcohol and Other Drug (AOD)/Mental Health (MH) Counseling, etc.).
- If AOD treatment and/or MH counseling is offered, this activity must be described in the component summary for the primary component with which it is combined. For example, if a participant is required to participate in vocational training and AOD treatment, the treatment rehabilitation activities must be included in the detailed narrative description for the vocational training component.
- If a county offers an FSET component not discussed in this handbook, a separate component template must be completed. **Note:** In order to qualify for federal funds, a full description of the component must be in the plan and it must adhere to all FSET requirements, including minimum and maximum participation requirements.
- Every component total cost must have a corresponding cost entry on Table 4.

The following are instructions for completing each item of Part I B. FSET Component Summaries. There is also an example of a completed component summary at the end of this section.

(1) Component name - Provide the full name, including any acronyms and concurrent activities associated with the component.

(2) Component type - Designate each component offered as either a work or non-work component (see the Definitions Section for a description of work and non-work activities).

(3) Component description - Each component description must contain a minimum of the following:

- a. Describe the activities that comprise the component. Include descriptions of supportive and enhanced ancillary services such as AOD treatment and mental health counseling.
- b. Participation Requirements - Identify the number of weeks or months each participant will be assigned to the component and the required hours of participation. When job search is offered independently or as part of a component, explain the method for monitoring job contacts (e.g., random phone calls).
- c. Organizational Responsibilities - Describe the organizational responsibilities for administering the component [specify service providers; which entity operates this component (e.g., Employment Services (ES) operates job search training; county operates individual job search; contractor operates vocational training, etc)].

(4) Geographic areas covered and variations among local areas - Summarize the areas of the county where this particular component will operate.

(5) Targeted populations - Identify who among the food stamp population is targeted to participate in the component e.g., ABAWDs, GA recipients, food stamp applicants and recipients, etc.

(6) Anticipated number of ABAWD participants who will begin the component each month Estimate the number of ABAWDs who are expected to begin the component. Include individuals who will begin the component concurrently with another one. In addition, include both mandatory participants and volunteers.

(7) Anticipated number of non-ABAWD participants who will begin the component each month - Estimate the number of non-ABAWDs who are expected to begin the component. Include individuals who will begin the component concurrently with another one. In addition, include both mandatory participants and volunteers.

(8) Total number of anticipated participants each month - Equal to items (6)+(7) above.

(9) Cost of the component without participant reimbursements - Estimate the cost of the component without transportation, dependent care and ancillary costs. This includes costs associated with salaries and contracts for administering the component. The total cost for each component must match the sum of Columns A, B, and C for that same component on Table 4.

(10) Cost of participant reimbursement for dependent care - Estimate the cost only for dependent care. The total cost for this component must equal the amount in Column D for that same component on Table 4.

(11) Cost of participant reimbursement for transportation/ancillary - Estimate the cost only for transportation and ancillary. The total cost for this component must equal the amount in Column E for that same component on Table 4.

(12) Total cost of the component including participant reimbursements - This cost is equal to items (9)+(10)+(11). The total cost for this component must equal the amount in Column F for that same component on Table 4. Estimate the cost per placement of the component by dividing the total estimated cost of the component by the anticipated number of placements.

EXAMPLE OF A COMPONENT SUMMARY

(1) Component name: Workfare/30-day Job Search prior to Workfare

(2) Component type: Work

(3) Component description:

- a. **Component Activities** - Workfare consists of job search followed by community service performed at a community-based organization, County Public Works, or other county government facility.
- b. **Participation Requirements** - Following the initial determination of eligibility, newly-certified ABAWDs are required to conduct up to 30 days of job search. Participants attend two days (six hours each day) of classroom instruction on job-search techniques, including interviewing, telephone technique, and preparation for interviewing and good work habits. The next five days are spent in a “phone room” arranging interviews with prospective employers. Participants must make five documented job contacts a day in the subsequent three weeks, reporting to a case manager every other week. Participants submit job search forms identifying employers contacted and participation is monitored via random phone calls. If the ABAWD has not obtained employment at the end of the 30-day Job Search period, the ABAWD is assigned to workfare. Hours of participation are determined by dividing the household’s monthly food stamp allotment by the state minimum wage of \$6.75 per hour, which will increase to \$7.50 per hour effective January 1, 2007.
- c. **Organizational Responsibilities** - The CWD’s Employment Services Division develops workfare component placements. Supervision of participants at the workfare sites is provided by the agency or organization receiving the participants’ services. The supervision costs are funded through interagency agreements and/or contracts.

(4) Geographic areas covered and variations among local areas:

The component is offered county-wide.

(5) Targeted populations: ABAWD applicants and recipients

(6) Anticipated number of ABAWD participants who will begin Workfare each month: 200

(7) Anticipated number of non-ABAWD participants who will begin Workfare each month: 0

(8) Total number of anticipated participants in Workfare each month (item 6+7): 200

(9) Cost of the component without participant reimbursements:

\$ 100 monthly cost per participant

X 200 monthly number of participants

\$ 20,000 = cost per month

X 12 months =

\$ 240,000 = annual FFY 2007 cost of this expense. The total cost for the Workfare component would be equal to the sum of Columns A, B, and C for that same component on Table 4.

(10) Cost of participant reimbursement for dependent care:

\$ 0

X 0 monthly number of participants

\$ 0 = cost per month

X 12 months =

\$ 0 = annual FFY 2007 cost of this expense. This amount would be entered in Column D of the Workfare component on Table 4.

(11) Cost of participant reimbursement for transportation/ancillary:

\$ 50 monthly cost per participant

X 200 monthly number of participants to be reimbursed

\$ 10,000 = cost per month

X 12 months =

\$ 120,000 = annual FFY 2007 cost of this expense. This amount would be entered in Column E of the Workfare component on Table 4.

(12) Total cost of the component including participant reimbursements:

\$240,000 Annual cost of Item (9) above
+0 Annual cost of Item (10) above
+120,000 Annual cost of Item (11) above =
\$ 360,000 = total annual FFY 2007 cost of workfare. This amount would be entered in Column F of the Workfare component on Table 4.

PLAN PART II

WORK REGISTRATION AND ABAWD INFORMATION

In this part, provide a clear explanation of the methods used to estimate work registrant and ABAWD counts. Use actual figures from the current fiscal year, whenever possible, in formulating the projection. Be as accurate as possible in developing these estimates.

Using the attached template, provide the following information:

A. Work Registrant Population –

1. Include the following work registrant data:
 - a. The number of work registrants in the existing food stamp caseload expected to be in the county on October 1, 2006.
 - b. The anticipated number of new work registrants to be added between October 1, 2006 and September 30, 2007.
 - c. The total number of work registrants in the county between October 1 and September 30 of the fiscal year ($a+b=c$).

Note: This number must match Table 1, Item A.

2. Unduplicated or Duplicated Work Registrant Count

FNS requires states to give an unduplicated count of work registrants so counties must make every effort to do so. By unduplicated, we mean the following:

- Individuals included in the work registrant count as of October 1 are not included in any subsequent count of work registrants for the remaining months of the year; and
- Individuals certified for food stamps or registered for work more than once in a 12-month period are only reported as a work registrant once during that 12-month period.
- Clearly explain whether the estimated number of work registrants is based on a duplicated or unduplicated count. If a county can only provide a duplicated count of work registrants, estimate in this section the portion of reported work registrants believed to be duplicated. Detail the methodology used in making this estimate.

B. Deferral Policy

1. Counties may defer from FSET participation categories of work registrants or individual work registrants not included in any other deferral category.

Discuss the county's deferral policy and specify who among the work registrant population will not be required to participate in FSET. The description of deferral policy in this part must be consistent with deferral regulations. The deferral counts must be consistent with counts shown in Item B of Table 1.

2. Indicate the frequency with which the CWD re-evaluates the validity of its deferrals.

C. ABAWD Population –

1. Include the following ABAWD data:
 - a. The number of ABAWDs in the existing food stamp caseload expected to be in the county on October 1, 2006.
 - b. The anticipated number of new ABAWDs to be added between October 1, 2006 and September 30, 2007.
 - c. The total number of ABAWDs in the county between October 1 and September 30 of the fiscal year ($a+b=c$).

Note: This number must match Item E of Table 1.

2. Unduplicated or Duplicated ABAWD Count

FNS requires states to give an unduplicated count of work registrants so counties must make every effort to do so. An unduplicated count occurs when:

Individuals included in the ABAWD count as of October 1 are not included in any subsequent count of ABAWDs for the remaining months of the year. Note: this includes ABAWDs who fail to meet the work requirement and regain eligibility in the same year; and

ABAWDs certified or registered more than once in a 12-month period are only reported once during that 12-month period.

Clearly explain whether the estimated number of ABAWDs is based on a duplicated or unduplicated count. If a county can only provide a duplicated count of ABAWDs, estimate in this section the portion of ABAWDs believed to be duplicated. Detail the methodology used in making this estimate.

PLAN PART III

PROGRAM COORDINATION

A. General Program Coordination - In this part, clearly describe how the FSET program relates to other processes in the FSP.

1. Narrative Coordination Statement - Describe the linkages between the following food stamp functions and the FSET program:

- intake, application, and recertification;
- work registration;
- screening for FSET participation;
- FSET component assignment;
- monitoring compliance with component requirements;
- determination of good cause;
- preparation of the Notice of Adverse Action; and
- disqualification due to noncompliance with program requirements.

2. Information Coordination - Briefly describe how information will be coordinated and exchanged (e.g., forms, computer linkages, documentation of participant status and actions taken). Note actions taken during the planning process to improve the coordination and information flow between the FSET program and other agency units.

Describe the intake and disqualification processes, including the procedures established to assure that appropriate disqualification actions are begun within ten days following a determination of no good cause. If the county wishes to use intake or other systems, which are compatible with its CalWORKs Welfare to Work (WTW) program, describe the proposed systems.

3. Coordination Time Frames - Describe time frames associated with the FSET program and the major FSP functions (e.g., how much time elapses between application for food stamps and referral into the FSET program, and between a finding of noncompliance and initiation of a Notice of Adverse Action).

B. Interagency Coordination - The FSET program should be coordinated as closely as possible with other relevant programs and agencies to maximize the use of all resources to assist food stamp applicants and recipients in improving their employability and self-sufficiency. Describe the linkages between the FSET program and other programs.

1. Areas of Coordination - Identify agencies or programs with which FSET is linked and explain how the programs are linked together. Agencies or programs with which the FSET program has linkages may include EDD, Community colleges, Vocational education agencies, Adult education schools, Social services agencies, CalWORKs WTW, WIA, and the county's GA program.

Items for which CWDs should describe linkages may include:

Another agency delivers services in an FSET component.

The CWD delivers services for another program or agency (e.g., the CWD has a contract to provide job search training to WIA clients).

The FSET program jointly operates one or more components (e.g., integrated workfare is offered in conjunction with the county's GA program).

The FSET program refers individuals to another agency or program for services (e.g., referral to public adult education classes for remedial education). Specify other areas of coordination as appropriate.

2. Methods of Coordination - Specify the methods of coordination between FSET and the agencies/programs identified in Item 1. Methods of coordination between agencies or programs may include the following:

- Non-financial interagency agreements.
- Contract for provision of services.
- Joint plans of operation (e.g., the FSET and CalWORKs programs may have prepared one integrated operations plan or manual).
- Informal referral procedures (e.g., the FSET program refers participants to WIA according to the regular intake policies for that program with no special arrangements for FSET participants).
- Specify other methods of coordination as appropriate (e.g., joint advisory committees, joint staff training, exchange of job orders, and/or job bank).

C. Contractual Arrangements - If the county anticipates contracting out any portions of the FSET program, specify which activities will be delegated to contractor(s). Specific information on the contractual arrangements need not be included in the FSET plan, e.g., name of contractor, amount of the contract and contract management approach. However, this information must be maintained by the CWD and be available for review by FNS upon request.

PLAN PART IV

PROGRAM COSTS AND FINANCIAL MANAGEMENT

This part of the county FSET plan addresses costs of the FSET program and related financial issues.

Note: *Approval of the CWD's estimated FSET budget does not constitute approval for the release of funds. Approval and release of FSET funds to the county is contingent upon submission of the County Expense Claim, which must reflect actual allowable expenditures.*

Exhibit 1 on page 32, FSET Program Federal/County Financial Participation Categories is included to assist counties in gaining a clear understanding of how the FSET program is funded with federal and county dollars. It depicts and explains the three FSET funding categories, including the two types of participant reimbursement.

A. Planned Costs of the County FSET Program

- 1. Operating Budget** - Table 4 captures the minimum amount of cost information acceptable for approval of a county FSET Plan. Provide a narrative description of the costs of the FSET program identified on Table 4.

If any costs shown as "Overall FSET Operational Costs" on Table 4 are not attributable to specific components, a complete explanation and justification of these costs must be included. CDSS must receive assurance that these costs do not represent any service to persons not receiving food stamps. Costs are allowed only with prior approval of CDSS and must be adequately documented to ensure that they are necessary, reasonable, and properly allocated to the FSET program.

If the CWD plans to match FNS 50 percent administrative funding with in-kind contributions, rather than a funding allocation, clearly explain the CWD's proposal.

If the CWD plans to use interagency agreements involving a transfer of funds to another agency of the county government, address the basis of charges for food stamp participants and the method for monitoring this agreement.

- 2. Justification of Education Costs** - States are prohibited from supplanting state/local education costs from the state and local agencies to the federal government. Counties must provide the following:

Assurance that such supplanting of federal costs does not and will not occur. Explanation of the basis for any charges to the federal government for educational costs. This must include a discussion of why such costs are attributed to the FSET program and cannot be met through other existing education programs. Address whether the services being provided are available to persons other than FSET participants and if so, what the cost is for those persons.

B. Participant Reimbursement - The CWD is responsible for reimbursing participants for necessary and reasonable expenses incurred in fulfilling FSET requirements. Expenditures that may be included in this category are transportation, dependent care, books, training manuals, uniforms or other special equipment, and any other necessary, reasonable, and properly allocated cost that a participant incurs for participation in the FSET program. Participant reimbursements must not be paid for with 100 percent federal grant or 50 percent matched administrative cost funding.

Participant expenses for transportation and costs other than dependent care—per participant per month—are reimbursed by the CWD with 50 percent federal cost sharing up to the actual cost of the participant expenses or the CWD maximum reimbursement rate, whichever is lowest.

Expenditures for dependent care—per dependent per month—are reimbursed by the CWD, with 50 percent federal cost sharing, up to the actual cost of the dependent care or the Regional Market Rate,¹ whichever is lowest. The CWD may provide reimbursements above established dependent care limits, but such costs must be paid for with 100 percent county dollars.

Participants with monthly expenses that exceed the amounts and limits above may have good cause for not participating. However, lack of county reimbursement funds is not a legitimate reason for deferring an individual from participation.

1. Method of Participant Reimbursement –

- a. Counties may choose between two methods for reimbursing participants. The county can either reimburse participants for actual expenses incurred, or reimburse based on a method derived by the CWD and described in this section. Describe which of the two methods the CWD has chosen.
- b. If the CWD wants to provide allowances to participants for transportation and costs other than dependent care based on the average costs of participating in FSET, include an explanation of the method that will be used to determine average expenditures, up to the maximum per participant per month amount chosen by the CWD (federal cost-sharing is limited to 50 percent of transportation and other costs).
- c. A county may provide or arrange for dependent care services in lieu of providing reimbursements. If the county chooses this option, describe the types of dependent care services to be provided (e.g., preschool, extended day care for school children, adult care for the elderly and infirm). Include a description of the referral process to the service provider and a description of the payment process (e.g., the participant is provided a voucher, which is given to the service provider at the time dependent care services are provided; the voucher is redeemed by the service provider on a monthly basis in the form of a bill to

¹ The latest regional market rates can be obtained at: <http://www.cde.ca.gov/fg/aa/cd/ap/index.aspx>

the CWD that identifies the number of individuals served and the total hours of services provided).

2. Procedure for Participant Reimbursement –

- a. Describe the procedure to be used for reimbursing participants. Counties may decide to provide up–front allowances for costs to be incurred, or they may choose to reimburse participants after the expenses have been incurred.

Note: For up–front allowances for dependent care expenses, a model practice for counties to follow is that the CWD obtains verification of the need for the dependent care, the amount of the expense, the name and address of the provider, and the hours of service prior to issuing the allowance.

- b. If other agencies are given responsibility for providing reimbursements to participants, explain how such costs will be reported.

c. Cost Allocation –

1. Describe the basis for allocating costs if the FSET program is being administered in conjunction with other employment programs serving recipients of other forms of assistance. Summarize how shared costs will be allocated among the pertinent programs.
2. Describe how shared costs would be allocated among the participating programs.

PLAN PART V

PROGRAM REPORTING AND MANAGEMENT INFORMATION

Counties are required to submit FSET program quarterly statistical reports (STAT 47 and an annual statistical report (Stat 48) to CDSS. The STAT 47 Report is due 15 business days after each fiscal quarter ends, and the STAT 48 report is due on November 15th of each year. Financial information is reported on a county expense claim and includes claims for the 100 percent Federal grant, 50 percent matched administrative funding, and participant reimbursements. The claim is due 30 days after the end of each federal fiscal quarter.

Counties are required to provide an initial count of the total number of work registrants in the county on the first day of each FFY. This count is included in the first quarter STAT 48 report. Counties must also report, on a quarterly basis, all participants who are newly work registered each month beginning in October. It is essential that CWDs accurately report these data elements so an actual count of work registrants for the year may be compiled.

- A. Obtaining Initial Count of Work Registrants** - Provide a detailed description of exactly how the CWD arrives at the number of work registrants in the county on the first day of each FFY (October 1).
- B. Ensuring an Unduplicated Work Registrant Count** In Part II (A).(2) the county indicates whether the number of work registrants reported is based on an unduplicated count, which is required on the STAT 47 and 48, of individuals.

Indicate whether the count of work registrants is unduplicated or duplicated. If the count is unduplicated, describe the method used to eliminate multiple registrations. For example, the CWD may conduct a match of social security numbers to eliminate duplicate work registrations over the course of the year. If the county is not able to produce an unduplicated count, describe how the CWD reports this number to CDSS (i.e., are the quarterly numbers adjusted when reported, or is an adjustment made at the end of the fiscal year). Report any plans to adopt a system to eliminate duplicate counts, including a time frame as to when the system is expected to be operational.

- C. Meeting Ongoing Federal Reporting Requirements** – Describe how FSET data will be compiled.
 - 1. Method of Gathering Data** - Describe the method used to gather work registration and ABAWD data e.g., automated systems; aggregate hard copy reports from local agencies.
 - 2. Local reporting requirements** - Specify whether contractors' will be required to submit regular reports to the CWD, identify the information that will be contained in such reports, and note the frequency with which local agencies and contractors must report data.

D. Contact Information - Provide the name and contact information for those persons in the county who have primary responsibility for gathering work registration and ABAWD data, completing the FSET plan, and preparing FSET financial reports and claims. Include the department, agency, fax and e-mail for each person.

GUIDELINES FOR COMPLETION OF FSET PLAN TABLES

TABLE 1

Estimated Participant Levels for Fiscal Year 2007 must be completed by FSET and Non-FSET counties.

Line A: Enter the anticipated number of work registrants in the county during FFY 2007 (October 1, 2006 through September 30, 2007).

This number must be the same as Part II, section A, entry 1c.

Line A is always equal to or greater than Line E.

Note: This estimate should be projected using data from Part A, Item 1 of the Stat 48 plus the annual total of Part A, item 1 of the Stat 47 report.

Line B: Enter the number of work registrants that are deferred from mandatory FSET participation in each of the categories 1 through 9.

Line B-10 represents the total number of deferred work registrants that will not be required to participate in FSET. For non-FSET counties, this number will be the county's entire work registrant population.

Line C: Enter the percentage of work registrants deferred from FSET. This number is equal to Line B-10 divided by Line A.

Line D: Enter the number of FSET mandatory participants. This number is equal to Line A minus Line B-10.

Line E: Enter the anticipated number of ABAWDs in the county during FFY 2007.

Line E includes ABAWDs living in waived areas and those receiving the 15% exemptions.

Line E must be less than or equal to Line A.

This number must be the same as Part II Section C, entry 1c.

Line E-1 (subset of Line E): Enter the anticipated number of ABAWDs living in waived areas during FFY 2007.

Note: For counties with a two-year waiver, this number is the same as Line E. For counties with a one-year waiver, this number is less than Line E since the waiver will end

July 1, 2007 and ABAWDs not otherwise exempt will be subject to the ABAWD work requirement. Counties without a waiver should enter zero.

Line E-2 (subset of Line E): Enter the anticipated number of ABAWDs who will be granted the 15% exemption during FFY 2007.

Line E-3: Enter the total number of ABAWDS by adding Lines e-1 and e-2.

Line F: Identify the at-risk ABAWD population by deducting line e-3 from line E. At risk ABAWDs are those food stamp recipients in danger of losing eligibility if they do not satisfy the ABAWD work requirement.

TABLE 1B

Criteria for 15 Percent ABAWD Exemptions

Table 1B must be completed by FSET and Non-FSET counties, regardless of whether the county is using the 15 percent ABAWD exemption.

Counties may exempt ABAWDs who are at risk of losing their eligibility for food stamps due to not meeting the ABAWD work requirement. Counties have discretion in establishing the criteria for use of the 15 percent ABAWD exemption. The exemption criteria must be described in Table 1B.

When exempting an ABAWD under the county's 15 percent ABAWD exemption criteria, the worker must document the basis for the exemption in the case file to avoid a quality control error.

- If a county does not intend to use the 15 percent exemption, it must clearly explain why the exemption will not be used.

TABLE 2

Estimated FSET Component Placements and Program Participants

This table is to be completed by FSET counties only. Please note that Table 2 reflects both a count of component placements and a count of participants. These entries are estimated annual numbers.

A. Estimated FSET Placements

This table requires the county to specify the estimated number of ABAWD and non-ABAWDs (including volunteers) placements into components that the county expects to make on or after October 1, 2006.

Please note, an individual may begin and participate in more than one component over the course of the year.

Each time the individual begins a new component, the county should count a placement. However, if an individual's participation in a single component is not continuous (e.g., participation is interrupted by a disqualification), count the placement only at the time of

initial commencement of the component. For example, if an ABAWD is placed in an activity in January, disqualified in February and re-enters the activity in March, that placement is counted only once.

Line A-1: Enter the estimated number of ABAWD applicants and recipients that the County expects to participate in a qualifying ABAWD component each month.

This estimate is determined as follows: Total the anticipated number of ABAWDs who will begin each qualifying FSET component in Part I-B and multiply this figure by 12 to represent FSET placements for the year.

Note: The estimated number of ABAWDs to be placed in job search or job club that is offered in combination with another activity to satisfy the 20-hour work requirement should not be counted in Line A-1. Only the qualifying activity with which it is combined should be counted. ABAWDs placed in the 30-day workfare job search component should not be counted separately as it is part of the larger workfare component. However, the estimated number of ABAWDs to be placed in a stand-alone job search and/or job club FSET component offered in conjunction with WIA or the Trade Act of 1977 should be counted under Line A-1 since these activities satisfy the ABAWD work requirement.

Line A-2: Enter the number of all other applicants and recipients that the County expects to participate in a component each month. This consists of ABAWDs in non-qualifying components and non-ABAWDs in both qualifying and non-qualifying components.

This estimate is determined as follows: Total the anticipated number of ABAWDs and non-ABAWDs who will begin each non-qualifying FSET component in Part I-B. Add to this the number of non-ABAWDs who will begin a qualifying component and multiply the total by 12 to represent FSET placements for the year.

Line A-3: Enter the total number of applicants and recipients expected to participate in a component each month during the fiscal year. This is the sum total of Line A-1 plus Line A-2.

Section B Estimated Individual Participation

On Table 2, Section B, provide an estimated count of individuals expected to participate in the FSET program during the fiscal year.

Each individual must only be counted once for the year regardless of the number of components the individual will be assigned to or the anticipated number of months the individual will participate. This number does not correlate with Item A of the table.

TABLE 3

Summary of Interagency Collaboration of the FSET Program -

This table describes the county's collaboration efforts with relevant programs and agencies that are used to assist food stamp applicants and recipients in improving their

employability and self-sufficiency. This description may include some community-based organizations or programs with which the county FSET program may have linkages (e.g. school districts, employment services, vocational education agencies, and social service agencies).

On Table 3, items number 1-5, for each statement, list the agencies involved, the number of FSET placements expected to be made, and the method of coordination. (e.g. memorandum of understanding, subcontract, etc.)

TABLE 4

Operating Budget for Federal Fiscal Year 2007 - planned FSET program expenditures.

- When completing this table, it is vital that budget estimates be realistic and based on concrete projections.
- Use actual spending for the current operating year as a starting point for future budget projections, not the levels projected in previous county FSET plans.
- The grand Total on Table 4 must equal the Grand Total on Table 5.
- If two or more activities are offered concurrently, separate all of the costs appropriately between the activities.
- For each component where assessment costs are applicable, those costs must be included in the Salary & Benefits column of the appropriate component.

Column A (Salary & Benefits) - Show the total cost for the salary and benefits of the county staff, i.e., eligibility workers, social workers, etc, (do not include contractor salary and benefit costs here.)

Column B (Other Costs) - Show the cost of overhead related to county staff, i.e., eligibility workers, social workers, etc. (do not include contractor overhead costs here)

Column C (Contract Costs) - Show the cost of any funds paid to contractors. (approximate amount to be paid to each contractor for each component.)

Column D (Dependent Care) - Total dependent care reimbursement costs for each component.

Column E (Transportation/Ancillary) - Total participant reimbursement cost for transportation and ancillary costs.

Column F (Total) - Total cost of each component (sum of columns A through E)

Grand Total Cost - should equal Table 5 Line 5.

TABLE 5

Planned Costs by Funding Category for FFY 2005- To be completed by FSET counties only.

Estimate the total costs of the county's FSET program by funding categories as shown on the table. The total costs depicted on Table 5 must be identical to those shown on Table 4.

DEFINITIONS

ABAWD - An Able-Bodied Adult Without Dependents (ABAWD) is a non-assistance food stamp recipient between the ages of 18 and 49 who does not qualify for one of the ABAWD exemptions listed in Manual of Policies and Procedures (MPP) Section 63-410.3 (see list below). Food stamp eligibility for ABAWDs is limited to any 3 months in a 36-month period (a 3-month time limit) unless the individual meets the ABAWD work requirement (see definition below).

ABAWD Exemptions - Persons are exempt from the ABAWD work requirement if they are exempt from food stamp work registration (see list of work registration exemptions below);

- Under 18 or over 50 years of age;
- Residing in a food stamp household that includes a child under 18 years of age; or
- Pregnant.

ABAWD 15% Exemption - The 15 percent exemption is a temporary exemption that counties may grant to ABAWDs who have used their three out of 36-months without meeting the ABAWD work requirement and are unable to meet the work requirement due to circumstances beyond their control. CDSS allocates 15 percent exemption months that counties may apply to ABAWDs.

Criteria for the 15 percent exemption are developed by counties and include such things as illiteracy, family crisis that interrupts FSET participation or causes a temporary reduction in hours worked, social and emotional barriers, remoteness, temporary homelessness, lack of adequate transportation, domestic violence, recent released from a drug or alcohol treatment program, working 10 to 19 hours per week and unable to meet the 20-hour work requirement, and other reasons determined on a case-by-case basis. Unlike those granted one of the ABAWD exemptions listed above, persons granted the 15 percent exemption are still considered ABAWDs and are counted as such for purposes of quarterly reports and estimated ABAWD counts in Table 1 of the FSET plan.

ABAWD Waiver - The Food and Nutrition Service (FNS) may approve waiver of the ABAWD work requirement for areas within a state that meet federally established waiver criteria. Waiver approval criteria include designation as a Labor Surplus Area (LSA) by the Department of Labor (DOL), having a recent unemployment rate above 10 percent or having an unemployment rate 20 percent greater than the national average over a two-year period.

ABAWD Work Requirement and Three-Month Limit - Eligibility for food stamps is limited to 3 months in a 36-month period unless the ABAWD, who is age 18 to 49, meets the following work requirements:

- works 20 or more hours a week, averaged monthly;

- participates in an allowable work activity such as an education or vocational training program for 20 or more hours a week; or
- participates in a workfare program.

ABAWDS can continue to receive food stamps for more than three months in a 36-month period if they meet the above work requirement or one of the following conditions:

- meet ABAWD exemption criteria,
- live in a county with an ABAWD waiver, or
- receive the 15 percent exemption.
- Persons who fail to meet the ABAWD work requirement may regain eligibility if, during a 30-day period, they work, or participate in an allowable work activity for 80 hours, or participate in workfare for the required number of hours. Persons, who regain eligibility and stop meeting the ABAWD requirement for reasons such as layoff, may receive food stamps for one grace period of three consecutive months during a 36-month period.

Assessment - An in-depth evaluation of employability skills often coupled with counseling on how and where to search for employment. If combined with work experience, some form of job search or job club, an assessment could constitute part of an approvable FSET component.

At-risk ABAWD - An ABAWD who is residing in a non-waiver county and is in danger of losing food stamp eligibility due to exhaustion of the three months out of 36-month time limit for persons not satisfying the ABAWD work requirement.

Component - A service, activity, or program, as described in the Manual of Policies and Procedures (MPP) Section 63-407.841, which is designed to help food stamp recipients gain skills, training, or work experience that will increase their ability to obtain regular employment and achieve self-sufficiency.

Within the FSET Program, components are designated either as “work” or “non-work.” Work components consist of Workfare, Self-Initiated Workfare, On-The-Job Training (OJT) and Work Experience. Non-work components consist of Job Search, Job Club, Education, and Vocational Training. Individuals may be required to participate in multiple components simultaneously provided hours of participation do not exceed the maximum parameter of 120 per month.

- Hours of participation in a work component are limited to the number obtained by dividing the household’s monthly food stamp allotment by the higher of the applicable federal or state minimum wage. In California, the state minimum wage is higher than the federal minimum wage.
- Hours in a non-work component can range from 12 to 120 per month.

- The maximum number of hours that can be required of an FSET participant is 30 hours per week or 120 hours per month.
- An FSET program may include, but is not limited to, one or more of the following components:

Non-work components:

Supervised and Unsupervised Job Search - Requires participants to make a predetermined number of inquiries to prospective employers over a specified period of time. The component may be designed so that the participant conducts his/her job search independently or within a group setting. Job search components should entail at least 12 contacts with employers per month for two months.

Job Club -This component enhances the participants' job readiness by providing instruction in job seeking techniques and increasing motivation and self confidence. The component may consist of job search activities, job skills assessments, job finding clubs, job placement services, or other training or support activities.

Vocational Training — This component is designed to improve the employability of participants by providing training in a skill or trade that allows the participant to move directly into employment.

Education — This component provides educational programs or activities to improve basic skills or otherwise improve employability. Such programs include Adult Basic Education (ABE), basic literacy, English as a Second Language (ESL), high school equivalency (GED), and post–secondary education.

A post secondary education component is one whose purpose is academic and whose curriculum is designed primarily for students who are beyond the compulsory age for high school. Only educational components that establish a direct link to job–readiness will be approved.

Federal FSET funds cannot take the place of nonfederal (i.e., State, local) funds for existing educational services. Federal Financial Participation (FFP) for operating education components may be authorized only for costs that exceed the normal cost of services provided to persons not participating in FSET.

Work components:

Workfare -The food stamp recipients perform work in a public service capacity as a condition of eligibility. In lieu of wages, workfare participants receive compensation in the form of their household's monthly coupon allotment.

The primary goal of workfare is to improve employability and encourage individuals to move into regular employment while returning something of value to the community.

Workfare assignments cannot replace or prevent the employment of regular employees, and assignments must provide the same benefits and working conditions provided to regular employees performing comparable work for comparable hours.

Self-Initiated Workfare - This component is designed to assist ABAWDs in fulfilling their work requirement. In self-initiated programs ABAWDs voluntarily participate, and find their own workfare job assignments. They are responsible for arranging to have their participation reported to their caseworkers and for verifying their workfare hours.

Work Experience or On-the-Job Training — This component is designed to improve the employability of participants through actual work experience and/or training, and enable them to move into regular employment. Work experience or on-the-job training assignments may not replace the employment of a regularly employed individual. And, they must provide the same benefits and working conditions provided to regularly employed individuals performing comparable work for comparable hours. It is permissible to place FSET participants in work experience positions with private sector entities.

Workforce Investment Act (WIA) Training - Under the WIA, job training services are developed, managed, and administered by State and local governments and the business community under WIA. Activities include basic skills training (GED, literacy), occupational skills training, on-the-job training, work experience, and job search assistance.

Alcohol or Drug Rehabilitation (AOD) and Mental health (MH) Counseling - FSET components may include participation in AOD rehabilitation and MH counseling provided the following conditions are met:

- The AOD and/or MH counseling activities provide social and support services, such as discussion groups and general counseling that can be directly linked to the participant's employability.
- AOD and MH counseling are not treated as a separate component, but constitute a minor portion of the primary component to which they are linked.
- Hours of participation in AOD rehabilitation and MH counseling do not exceed 25 percent of the combined FSET activities e.g., a 20-hour per week combination component might consist of 15 hours spent in vocational training with the remaining 5 hours devoted to participation in AOD treatment. When offered as part of a vocational training or educational activity, hours of participation in AOD or MH counseling count toward completion of the ABAWD work requirement.

In order to qualify for FSET program reimbursement, AOD or MH services must:

- Be reasonably necessary and directly related to FSET program component participation;
- Not be considered "medical" (i. e. a course of treatment provided by licensed physicians, psychologists, etc.)

- Not be available through another government program or available at no cost to the participant through a private source such as a charitable organization.

Contractor - Any public or private entity that is providing FSET services under a financial or non-financial agreement with the county agency.

Deferred - This term refers to a work registered person or persons temporarily excused by the county from mandatory participation in the FSET Program.

Food Stamp Employment and Training Program - A county administered program designed to assist food stamp recipients increase their employability and self-sufficiency through participation in job search, job club, workfare, education and/or vocational training components.

FSET Mandatory Participant - A FSP applicant or recipient who is neither exempt from food stamp work registration, nor deferred from participation in FSET. Typically, a county does not assign all mandatory participants to an FSET activity either because some participants are not targeted by the county to receive FSET services, or because FSET funds are insufficient to serve all participants. All mandatory participants must be identified in item D of Table 1.

Non-ABAWD - A work registrant that qualifies for one of the ABAWD exemptions at MPP Section 63-410.32 namely, under age 18 or over age 49, pregnant, or residing in a food stamp household with a child under the age of 18.

Qualifying ABAWD Activity - An activity that satisfies the ABAWD work requirement. Qualifying activities consist of workfare (including the 30-day job search activity that can be assigned prior to workfare), self-initiated workfare, work experience/on-the-job training (OJT), vocational training and education. Stand-alone FSET job search or job club components are not qualifying activities for ABAWDs. However, hours spent in job search or job club may be combined with vocational training or education activities to meet the 20-hour ABAWD requirement provided time spent in job search or job club comprises less than half of the total hours spent in the components.

Screening - An evaluation by the county as to whether a person should or should not be referred for participation in an FSET program. This activity is not an approvable FSET component.

Volunteer - A food stamp recipient who chooses to participate in FSET and is either exempt from food stamp work registration or deferred from FSET participation. Volunteers are not subject to sanction for failure to comply with FSET requirements. The hours of participation or work required of volunteers may not exceed the hours required of mandatory FSET participants.

Workforce Development System - An interconnected strategy for providing comprehensive labor market and occupational information to job seekers, employers, providers of one-stop delivery of core services, providers of other workforce employment activities, and providers of workforce education activities. Each component of a county's

FSET program must be delivered through its workforce development system. If the component is not available locally through such a system, the county may use another source.

Work Program - For purposes of satisfying the ABAWD work requirement, a work program is:

- A program under the Work Investment Act (WIA). Participation in job search activities of 20 hours or more per week under the WIA satisfies the ABAWD work requirement. This is not the case for the stand-alone FSET job search component at MPP Section 63-407.841.
- A program under Section 236 of the Trade Act of 1974. The Trade Act applies to workers identified by the Employment Development Department (EDD) as adversely affected by the U.S. trade agreements e.g., the North American Free Trade Act. The Trade Act provides training services to adversely affected workers through participation in programs that are subject to approval by the Secretary of the U.S. Department of Labor. These programs include job search, job club, on-the-job training, WIA training, or a program of remedial education. Unlike stand-alone FSET job search, job search activities of 20 hours or more per week under the Trade Act satisfy the ABAWD work requirement.
- An employment and training program, including the FSET Program, other than a job search or job club component.

Note: To qualify for FSET funds, a work program must be included in the State FSET Plan and it must adhere to the minimum and maximum participation requirements established for FSET.

Work Registrant - A non-assistance food stamp applicant or recipient who is subject to food stamp work requirement at Manual of Policies and Procedures (MPP) Section 63-407.4, unless the individual meets one of the work registration exemptions at MPP Section 63-407.21 (see list below).

Work Registration Exemptions - An individual is exempt from food stamp work registrant requirements if he/she meets one of the exemptions at MPP Section 63-407.21 (see list below):

- Younger than 16 years of age or 60 years of age or older;
- 16 or 17 year old who is not head of household, or who is attending school or enrolled in an employment training program at least half time;
- Physically or mentally unfit for employment;
- Complying with CalWORKs Welfare-To-Work requirements;
- Caring for a dependent child under age 6 or an incapacitated person;

- Receiving or has applied for unemployment insurance benefits;
- Participating in a drug or alcohol treatment program that prohibits employment of 30 hours or more per week;
- Employed or self-employed at least 30 hours per week or receiving weekly earnings at least equal to the federal minimum wage multiplied by 30 hours;
- Half-time school attendance.

Work Registrant Requirements - As a condition of food stamp eligibility, every NAFS applicant and recipient between the ages of 15 and 60 who does not qualify for a work registration exemption must comply with the following requirements:

- Register for work or be registered by the county;
- Participate in the FSET Program if assigned by the county;
- Provide sufficient information to determine employment status or availability for work;
- Report to an employer when referred by the county or its designee;
- Accept a bona fide offer of suitable employment; and
- Must not voluntarily quit a job of 30 or more hours a week or reduce work hours to less than 30 hours a week without good cause.

**EXHIBIT 1
FSET PROGRAM FEDERAL/COUNTY
FINANCIAL PARTICIPATION CATEGORIES**

ACTIVITIES	FINANCIAL PARTICIPATION
FSET administrative costs	100 percent federal funding, up to the amount of the approved allocation
FSET administrative costs which exceed the 100 percent federal fund allocation	50 percent federal and 50 percent county funding
Participant reimbursement for transportation and ancillary costs incurred to participate in the FSET program	50 percent federal and 50 percent county funding of <u>actual</u> costs
Participant reimbursement for dependent care cost incurred to participate in the FSET program	50 percent federal and 50 percent county funding of the lower of actual dependent care costs or the Regional Market Rate*
	Participant reimbursement costs above the 50 percent rate are not eligible for additional federal funding

*The latest California Regional Market Rate for dependent care may be found at:
www.cde.ca.gov/fg/aa/cd/ap/index.aspx.

EXHIBIT 2
RELATIONSHIP OF THE ANNUAL FSET PLAN TO QUARTERLY
STAT 47 AND STAT 48 REPORTS AND FSET EXPENSE CLAIMS

FSET Plan

The annual FSET plan provides estimates of the planned activities and program costs for the FFY.

STAT 47 and STAT 48 Data Report

The quarterly STAT 47 and annual STAT 48 data reports are compiled to provide FNS with the actual number of work registrants and ABAWDs for each quarter as well as the number of persons participating in FSET components, and the number of ABAWDs receiving the 15 percent exemption or living in a county with an ABAWD waiver. The data from these reports also provide a starting point for counties to develop estimates for the next year's FSET plan. Unless the county anticipates significant changes in the size and characteristics of its food stamp population or the number of persons to be served in FSET, estimates for the number of work registrants, ABAWDs, and component placements should not differ significantly from that reported on the Stat 47 and 48 forms.

FNS program staff uses the data from these reports to determine the annual amount of FSET funds and 15 percent ABAWD exemptions. Thus, it is imperative that counties strive for accuracy in completing the Stat 47 and 48 reports.

Quarterly County Expense Claims

The counties' quarterly expense claims for FSET are reviewed and compiled by CDSS accounting staff and then sent to FNS financial management staff. FNS' financial management staff reviews the claims and issue reimbursements to states. The amounts reported on the county expense claims include all FSET funding categories (i.e., 100 percent federal funds for administration, 50/50 administrative overmatch, 50/50 participant reimbursement for transportation/ancillary, and 50/50 participant reimbursement for dependent care). Counties need to ensure that the amount of 100 percent federal funds reported on the STAT 47 data report do not exceed the amount of 100 percent federal funds claimed on the county expense claim for FSET administration for the same reporting period.

FSET County Plan Template - Enclosure 2

COUNTY PLAN COVER SHEET
(To be completed by counties offering FSET)

County of _____

ABAWD County Waiver? Yes___ or No___

Number of FSET Components _____

Prepared by: _____

Title: _____

Telephone: _____

Fax: _____

E-mail: _____

Date Submitted: _____

PART I
SUMMARY OF COUNTY FOOD STAMP
EMPLOYMENT AND TRAINING PROGRAM

(Refer to pages 6-11 of the guidelines for detailed instructions).

Part I of the county FSET plan summarizes the FSET program that the CWD plans to implement.

A. Abstract of the County FSET Program – Provide a narrative description of your county’s FSET program and include the following information:

- 1. Program Changes** - Describe the nature of changes, if any, being made to the FSET program.
- 2. Program Components** - Include the following information when describing program components:
 - a. List the county’s FSET components (job search, job club, education, vocational training, workfare, self-initiated workfare, on-the-job training, work experience, other).
 - b. Identify the participation requirements for each component.
 - c. Describe combination components that will satisfy the ABAWD work requirement.
- 3. Sequencing of Components** - If applicable, describe any sequence of FSET components.
- 4. Other Employment Programs** - Identify other employment programs and explain any interface between these programs and FSET.
- 5. Workforce Development System** - Explain how FSET components will be delivered through the workforce development system. Discuss the means by which the county will provide components not offered through the system.
- 6. Outcome Data** - Provide any FSET outcome data available to the county.

B. FSET Components Summaries - The following template must be used in describing the counties FSET components. Complete a separate template for each component that is offered). The cost of each component must be shown on Table 4.

(1) Component name: _____

(2) Component type: _____

(3) Component description:

- a. Component Activities. Describe the activities that comprise the component.
- b. Participation Requirements. Identify the length of the component and the weekly/monthly participation requirements.
- c. Organizational Responsibilities. Explain how the component is administered and identify the entities involved in administering it.

(4) Geographic areas covered and variations among local areas:

County-wide

Other

(specify): _____

(5) Targeted populations (e.g., ABAWDs, General Assistance recipients) Please be specific. _____

(6) Anticipated number of ABAWD participants who will begin each month: _____

(7) Anticipated number of non-ABAWD participants who will begin each month: _____

(8) Total number of anticipated participants each month (6+7): _____

(9) Cost of the component without participant reimbursements:

\$ _____ monthly cost per participant

X _____ monthly number of participants [The number of participants must be the same as item (8) above.]

\$ _____ = cost per month

X 12 months =

\$ _____ annual FFY 2007 cost of this component without participant reimbursement. This amount must match the sum of Columns A, B, and C for this component on Table 4.

(10) Cost of participant reimbursement for dependent care:

\$ _____ monthly cost per participant

X _____ monthly number of participants to be reimbursed
[The number of participants must not be greater than item (8) above.]

\$ _____ = cost per month

X 12 months =

\$ _____ annual FFY 2007 cost of this expense. Enter this amount in Column D for this component on Table 4.

(11) Cost of participant reimbursement for transportation/ancillary:

_____ monthly cost per participant [\$25 cap eliminated]

X _____ monthly number of participants to be reimbursed

[The number of participants must not be greater than item (8) above.]

\$ _____ = cost per month

X 12 months =

\$ _____ annual FFY 2007 cost of this expense.
Enter this amount in Column E for this component on Table 4.

(12) Total cost of the component including participant reimbursements:

\$ _____ Annual cost of Item (9) above;

+ _____ Annual cost of Item (10) above;

+ _____ Annual cost of Item (11) above;

\$ _____ Total cost. Enter this amount in Column F for this component on Table 4.

Part II

WORK REGISTRATION AND ABAWD INFORMATION

(Refer to pages 12-13 of the guidelines for detailed instructions)

A. Work Registrant Population -

1. Work Registrant Counts - Estimate the following:

- a. The number of work registrants in the existing food stamp caseload expected to be in the county on October 1, 2006. _____
- b. The anticipated number of new work registrants to be added between October 1, 2006 and September 30, 2007. _____
- c. The total number of work registrants in the county between October 1 and September 30 of the fiscal year (a+b=c). _____

Note: This number must match Table 1, Item A.

2. Unduplicated or Duplicated Work Registrant Count

FNS requires states to give an unduplicated count of work registrants so counties must make every effort to do so. By unduplicated, we mean the following:

- individuals included in the work registrant count as of October 1 are not included in any subsequent count of work registrants for the remaining months of the year; and
- Individuals certified for food stamps or registered for work more than once in a 12-month period are only reported as a work registrant once during that 12-month period.

Explain whether this count is duplicated or unduplicated. If the count is duplicated, estimate the portion of work registrants believed to be duplicated and detail the methodology used to make this determination.

B. Deferral Policy

1. Describe the deferral policy and identify those persons that will be deferred. (must be consistent with deferral counts shown in Item B of Table 1.)

2. Indicate the frequency with which deferrals are re-evaluated

C. ABAWD Population

1. ABAWD Counts - Estimate the following:

- a. The number of ABAWDs in the existing food stamp caseload expected to be in the county on October 1, 2006. _____
- b. The anticipated number of new ABAWDs to be added between October 1, 2006 and September 30, 2007. _____
- c. The total number of ABAWDs in the county between October 1 and September 30 of the fiscal year ($a+b=c$). _____

***Note:** This number must match Item E of Table 1.

2. Unduplicated or Duplicated ABAWD Count

Explain whether this count is duplicated or unduplicated. If the count is duplicated, estimate the portion of ABAWDs believed to be duplicated and detail the methodology used to make this determination.

PART III

PROGRAM COORDINATION

(Refer to pages 14-15 of the guidelines for detailed instructions)

- A. General Program Coordination** - Describe how the FSET program relates to other processes in the FSP.
- 1. Narrative Coordination Statement - Describe the linkages between the following food stamp functions and the FSET program:**
 - intake, application, and recertification;
 - work registration;
 - screening for FSET participation;
 - FSET component assignment;
 - monitoring compliance with component requirements;
 - determination of good cause;
 - preparation of the Notice of Adverse Action; and
 - disqualification due to noncompliance with program requirements.
 - 2. Information Coordination** - Describe how information will be coordinated and exchanged and explain the intake and disqualification processes.
 - 3. Coordination Time Frames** - Describe time frames associated with the FSET program and the major FSP functions.
- B. Interagency Coordination** - Describe the linkages between the FSET program and other programs.
- 1. Areas of Coordination** - Identify agencies or programs with which FSET is linked and explain how the programs are linked together.
 - 2. Methods of Coordination** - Specify the methods of coordination between FSET and the agencies/programs identified in Item 1 above.
- C. Contractual Arrangements** - If applicable, specify those FSET activities that will be delegated to contractor(s).

PART IV

PROGRAM COSTS AND FINANCIAL MANAGEMENT

(Refer to pages 16-18 of the guidelines for detailed instructions)

A. Planned Costs of the County FSET Program

- 1. Operating Budget** - Provide a narrative description of the costs of the FSET program identified on Table 4.

- 2. Justification of Education Costs** - If education components are included, explain why the cost of such components can only be met through FSET and not through other existing education programs. Discuss the availability and cost of providing the education activities to those not participating in FSET.

B. Participant Reimbursement -

1. Method of Participant Reimbursement

- a.** Describe whether the CWD will reimburse participants based on the actual cost of participation or based on some other method developed by the county.

- b.** If the CWD wants to provide allowances for transportation and costs other than dependent care based on the average costs of participating in FSET, describe the method to be used in determining average expenditures.

- c.** If the CWD chooses to provide or arrange for dependent care services, describe the services to be provided, the referral process to the service provider, and the payment processes.

2. Procedure for Participant Reimbursement -

- a. Describe the procedure to be used for reimbursing participants.

- b. Explain how costs will be reported if other agencies are given responsibility for providing reimbursements.

C. Cost Allocation –

- 1. Describe the basis for allocating costs if FSET is administered in conjunction with other employment programs.

- 2. Summarize how shared costs will be allocated among the pertinent programs.

PART V

PROGRAM REPORTING AND MANAGEMENT INFORMATION

(Refer to pages 19-20 of the guidelines for detailed instructions)

- A. Obtaining Initial Count of Work Registrants** - Describe how the CWD determines the number of work registrants in the county on the first day of each FFY.

- B. Ensuring an Unduplicated Work Registrant Count** - Indicate whether the count of work registrants is unduplicated or duplicated. If the count is unduplicated, describe the method used to eliminate multiple registrations. If the county is not able to produce an unduplicated count, describe how the CWD reports this number to CDSS. Report any plans to adopt a system to eliminate duplicate counts, including a time frame as to when the system is expected to be operational.

- C. Meeting Ongoing Federal Reporting Requirements** – Describe how FSET data will be compiled, including:

- 1. Method of Gathering Data** (Describe the method used to gather work registration and ABAWD data.

- 2. Local reporting requirements** - Specify whether contractors will be required to submit regular reports to the CWD, identify the information that will be contained in such reports, and note the frequency with which local agencies and contractors must report data.

D. Organizational Responsibility

1. Person responsible for Work Registrant and ABAWD reporting

Name: _____
Title: _____
Department/Agency: _____
Phone Number: _____
Fax: _____
E-mail Address: _____

2. Person responsible for Preparing the FSET Plan -

Name: _____
Title: _____
Department/Agency: _____
Phone Number: _____
Fax: _____
E-mail Address: _____

3. Person responsible for FSET Financial Analysis and Claims –

Name: _____
Title: _____
Department/Agency: _____
Phone Number: _____
Fax: _____
E-mail Address: _____

TABLE 1

ESTIMATED PARTICIPANT LEVELS

(Refer to pages 20-23 of the guidelines for detailed instructions)

A. Anticipated number of work registrants in the county during the fiscal year _____

(Enter the number from Part II Section A-1 Line c)

B. Anticipated number of work registrants deferred from mandatory FSET participation due to the following categories:

1. Lives in a non-FSET county _____

2. Participates in a substitute program that has participation requirements that exceed FSET participation requirements _____

3. Lacks dependent care _____

4. Lacks transportation to an FSET Program site _____

5. Lives an unreasonable distance from the FSET Program site _____

6. Has a severe family crisis _____

7. Temporarily unemployed and expected to return to work within 60 days _____

8. Involved in legal difficulties _____

9. Has a temporary illness or disability _____

10. Total number of deferred work registrants (1 through 9) _____

C. Percent of all work registrants deferred from FSET (Line B 10 total ÷ Line A) _____%

D. Number of FSET mandatory participants (Line A minus Line B10 total) _____

E. Anticipated number of ABAWDs in the county during the fiscal year _____
(Line E must be less than or equal to Line A)

E-1 Anticipated number of ABAWDs in waived areas of the county during the fiscal year. (Subset of Line E) _____
(Enter the number from Part II Section C-1 Line c)

E-2 Anticipated number of ABAWDs exempted under 15 percent ABAWD exemption allowance during the fiscal year (Subset of Line E) _____

E-3 Total subset of ABAWDs (E-1 + E-2) _____

F. At-risk ABAWDs expected in the county during the fiscal year (E minus E-3) _____

TABLE 1B

CRITERIA FOR 15 PERCENT ABAWD EXEMPTIONS

Provide the criteria that the county will use to exempt additional ABAWDs under the county's 15 percent ABAWD allocation. If the county is not using the exemption, provide an explanation below.

Exemption criteria for FFY 2006/2007:

Reason for not implementing the 15 percent ABAWD exemption:

TABLE 2

ESTIMATED FSET COMPONENT PLACEMENTS AND PROGRAM PARTICIPANTS

A. ESTIMATED FSET PLACEMENTS

1. Number of ABAWD applicants and recipients expected to participate in a qualifying ABAWD component each month _____
2. Number of all other applicants and recipients expected to participate in a component each month (i.e., ABAWDs in non-qualifying activities and non-ABAWDs in both qualifying and non-qualifying activities) _____
3. Total number of applicants and recipients expected to participate in a component each month during the fiscal year (**A-1 + A-2**) _____

B. ESTIMATED INDIVIDUAL PARTICIPATION

1. Unduplicated number of individuals expected to participate in the FSET Program during the fiscal year * _____

* *This number is less than line A-3 above because here you count each individual only once.*

TABLE 3

SUMMARY OF INTERAGENCY COORDINATION FOR THE FSET PROGRAM

Coordination Areas	Agencies Involved	Number of FSET Placements Expected	Methods of Coordination
1. Delivers an FSET component			
2. The FSET program delivers a service for another agency or program			
3. Joint component of the FSET program and another agency or program			
4. Referral of individuals from the FSET program to another program or agency			
5. Other forms of coordination (specify)			

TABLE 4 OPERATING BUDGET

Component	A Salary & Benefits	B Other Costs (Overhead)	C Contract Costs	D Dependent Care	E Transportation/ Ancillary	F Total (A through E)
1 Job Search						
2 Job Club						
3 Workfare						
4 Self-Initiated Workfare						
5 WE or OJT						
6 Vocational Training						
7 Education						
8 Other						
9 Subtotals (Lines 1 through 8)						

Grand Total Cost

Abbreviations:

OJT = On-the-Job Training WE = Work Experience

Reminders:

1. Separate the costs of operating concurrent activities and charge the costs to each appropriate component. For example, if you offer Vocational Training and Job Club concurrently, then put the Vocational Training costs on Line 6 and the Job Club costs on Line 2.
2. Charge contract costs of drug and alcohol rehabilitation, mental health counseling, and enhanced supportive services to the accompanying component in column C.

TABLE 5 PLANNED COSTS BY FUNDING CATEGORY

Funding Categories	Estimates of Cost
1. 100 Percent Federal FSET Grant	
2. Overmatch for Administration Cost	
2a. 50 Percent Federal	
2b. 50 Percent County	
2c. <u>Subtotal</u> for Overmatch (2a + 2b)	
3. Participant Reimbursement for Transportation/Ancillary	
3a. 50 Percent Federal	
3b. 50 Percent County	
3c. <u>Subtotal</u> for Transportation/Ancillary (3a + 3b)	
4. Participant Reimbursement for Dependent Care	
4a. 50 Percent Federal	
4b. 50 Percent County	
4c. <u>Subtotal</u> for Dependent Care (4a + 4b)	
5. Grand Total of Planned Cost (1+2c+3c+4c) <i>Must agree with Table 4's Grand Total Cost</i>	