

TULARE COUNTY WORKFORCE INVESTMENT BOARD
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WIB WtW DIRECTIVE

#WD00-1

DATE: September 11, 2000

TO: WIB Service Providers
WIB Staff
WID Staff

SUBJECT: WtW GRANT PROGRAM ELIGIBILITY, ASSESSMENT, AND REFERRAL

EXECUTIVE SUMMARY

Purpose:

This directive contains Federal and State requirements for eligibility determination for participation in the Welfare-to-Work (WtW) Grant program.

Scope:

This directive applies to Tulare County Workforce Investment Department (WID) staff and Welfare to Work Grant Program Service Providers.

Effective Date:

This directive is effective immediately.

REFERENCES:

- . Title VIII-D Welfare to Work and Child Support Amendment of 1999, Section 801, Flexibility in Eligibility for Participation in the Welfare-to-Work Grant Program
- . Title 20 Code of Federal Regulations (CFR) Part 645, WtW Grants Interim Rule (November 18, 1997)
- . Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) of 1996, Social Security, Title IV, Part A, Section 401 et al (August 22, 1996)
- . Child Support Performance and Incentive Act of 1998, Social Security Act Title IV, Part A,

Section 403(a)(5)(C)(ii)(July 16,1998)

- Title 45 Code of Federal Regulations (CFR) Part 260, et al., Temporary Assistance for Needy Families (TANF): Final Rule (April 12, 1999)
- Department of Labor (DOL) Training and Employment Guidance Letter (TEGL) 11-97, Change 1 Subject: Welfare-to-Work Reporting (February 22, 1999)
- DOL TEGL 6-98, Change 1, Subject: Technical Amendment to WtW – Eligibility Criteria for Noncustodial Parents (September 21, 1998)
- DOL JTPA Regional Bulletin (JRB) 13-98, Subject: Request for Comments on Proposed WtW Monitoring Guide (May 26, 1998)
- DOL Employment and Training Administration’s Welfare-to-Work Questions and Answers Internet site at <http://wtw.doleta.gov>
- All County Letter (ACL) 99-20, Subject: WtW Grant Program Policy Issues (April 9, 1999)
- ACL 98-90, Subject: Federal WtW Grant Program (November 18, 1998)
- ACL 98-42, Subject: Drug and Fleeing Felons Regulations (July 1, 1998)
- Memorandum of Understanding, Welfare-to-Work Grant Program Referral, Eligibility Documentation, Communication, and Confidentiality between Tulare County Workforce Investment Board (formerly the Tulare County Private Industry Council, Inc.) and Tulare County Health and Human Services Agency

BACKGROUND:

The WtW Grant Interim Rule, Title 20 CFR Section 645.212, 645.213 and 645.214 and the VIII-D Welfare-to-Work and Child Support Amendment of 1999 establish the categories and eligibility criterion for the WtW Grant Program. The above law and regulations amend and implement the WtW Grant provisions of the Title IV Part A, Section 403(a)(5)(C)(ii), (iii), and (iv) of the Social Security Act.

POLICY AND PROCEDURES:

Definitions:

The following terms are used in this directive:

Welfare-to-Work has two meanings in this directive. When referring to the CalWORKs employment component, the term *welfare-to-work* will be used. References to the WtW Grant program will be noted by the acronym *WtW*.

Eligibility Criteria Under the 70% Provision

There are two groups of people who may participate in the WtW Grant program under the 70% provision. They are CalWORKs recipients and noncustodial parents of minors who are receiving public assistance. The specific criteria is described below:

1. CalWORKs recipient eligible to participate in the WtW Grant program under 70% provision:

- An individual is currently receiving CalWORKs assistance, and
- Has received CalWORKs/TANF assistance for 30 months or more, or
- Will become ineligible for CalWORKs assistance within 12 months due to their federal 60-month

lifetime limits

2. Noncustodial parent eligible to participate in the WtW Grant program under 70% provision:

- An individual who is a noncustodial parent of a minor child and meets **one** of the following criteria:
 - The minor child or the custodial parent of the noncustodial parent's minor child has received CalWORKs/TANF assistance for 30 months or more, or will become ineligible for CalWORKs/TANF assistance within 12 months due to federal 60-month lifetime limits.
 - The minor child is eligible for or is receiving CalWORKs/TANF assistance.
 - The minor child received CalWORKs/TANF assistance in the 12-month period before the date of determination, but no longer receives assistance.
 - The minor child is eligible for or is receiving assistance under the Food Stamp program, the Supplemental Security Income program, Medicaid, or the Children's Health Insurance Program.

In addition to the above, the noncustodial (NCP) parent must meet one of the following three criteria:

- Unemployed
 - An individual who is without a job and who wants to and is available for work.
- Underemployed. To qualify for this category the NCP must fit one of the following definitions:
 - An individual who is employed in an entry level job requiring minimal skill
 - An individual who is employed in a job below skill potential
 - An individual who is employed in a job with no advancement opportunities
 - An individual who is employed less than full-time; full-time is defined as 40 hours a week for three (3) consecutive months in the last twelve (12) months.
- Having difficulty paying child support. This category was defined through a collaboration between the Tulare County Workforce Investment Board (WIB) and the Tulare County Family Support Division (FSD) to mean one of the following:
 - An individual who is more than \$150 behind on child support payments
 - An individual at an income level that is not sufficient to render a support obligation that meets the "minimum basic standard of care for a child" as determined by the local child support enforcement agency
 - An individual the court has determined has an "ability to earn," which is greater than the actual earning level

A NCP must also enter into a personal responsibility (see attached form WtW15) contract under which a commitment is made to cooperate in (1) establishing paternity, (2) paying child support, (3) participating in services to increase their employment and earnings, and (4) enhance the financial and emotional contributions to the well-being of the minor child.

Eligibility Criteria Under the 30% Provision

The four categories of individuals as described below are eligible to participate in WtW Grant program activities if they meet the following criteria:

1. CalWORKs Recipients:

Current CalWORKs recipients and individuals who would otherwise be eligible for CalWORKs

assistance if he/she had not reached their federal 60-month lifetime limit on aid **and** has at least one of the following characteristics associated with or predictive of long term welfare dependence:

- Teenage pregnancy
- Single parent
- Poor work history (employed full time for fewer than 45 of the last 52 weeks in unsubsidized employment)
- Limited basic skills (reading or math skill below a 12th grade level)
- Monolingual in a language other than English
- No high school diploma or GED
- Disabled
- Substance Abuse
- Victim of Domestic Abuse

The characteristics listed above are included in the WIB's (Formerly the Tulare County Private Industry Council, Inc. known as PIC) local WtW plan for the 85% Formula Grant.

2. Former Foster Care Youth:

Youth aged 18 to 24 who before attaining 18 years of age were recipients of foster care.

3. CalWORKs recipients with additional barriers to self-sufficiency:

An individual who is currently receiving CalWORKs assistance and has significant barriers to self-sufficiency under criteria defined by the local Workforce Investment Board. The Tulare County Workforce Investment Board has chosen not to define barriers in this category.

4. Custodial Parents:

Custodial parents with income below 100 percent of the poverty line.

Coordination Between TulareWORKs and Tulare County Workforce Investment Board (WIB) to Target and Serve Participants Eligible for the WtW Grant program as a CalWORKs Recipient

The CalWORKs recipients may participate in the WtW Grant Program as part of, or as an alternative to, participating in the CalWORKs welfare-to-work funded activities. The recipient must be eligible for the WtW Grant program and include the WtW Grant program activities as part of their CalWORKs welfare-to-work plan or as an addition to the CalWORKs activities.

TulareWORKs and the Tulare County Workforce Investment Board (WIB), formerly the PIC, entered into a Memorandum of Understanding regarding the WtW Grant program referral, eligibility documentation, communication, and confidentiality process. In this MOU TulareWORKs and the WIB agreed that:

“TulareWORKs maintains full responsibility for both targeting and referring current TANF recipients who meet the Welfare-to-Work Grant Program definition for the purpose of eligibility. TulareWORKs will further be responsible for the payment of supportive services. The Tulare County Workforce Investment Department (WID) will provide a two-week job

readiness workshop followed by unsubsidized employment or paid employment activities, vocational training, and post employment services, and job retention services.”

TulareWORKs will provide the following services to target, refer, and provide eligibility documentation:

- Screen TANF recipients for WtW Grant program eligibility criteria
- Complete the WtW Grant Certification form (Attachment 1) attesting that the information provided is documented in the case file and/or computerized data system
- Participants referred to the WID shall include individuals who are determined to be the hardest to serve based on the 70% or 30% eligibility provisions
- Schedule the targeted individuals for a weekly orientation with the WID at each of the five TulareWORKs district offices
- Following orientation and eligibility of the participants, set up transportation, childcare, and ancillary supportive services on an as needed basis
- Complete the Welfare-to-Work plan with the participant and discuss time limits
- Provide on going case management, which includes initiating the cause determination/sanction process for non-participating clients

The WID will provide the following services:

- Conduct an on site orientation, eligibility, and assessment of all potential WtW participants scheduled by TulareWORKs

The WID’s Service Providers will provide the following services:

- Conduct or assist in conducting an on site orientation of all potential WtW participants scheduled by TulareWORKs
- Provide a combination of services based on the assessment and Welfare-to-Work plan which may include job readiness, job placement, paid work experience or community service, on-the-job training, post employment services, job retention services, and case management
- Ensure that the participant meets the CalWORKs requirement for hours of participation
- Maintain close communication with TulareWORKs providing necessary information (for example, failure to meet hours of participation, employment status, supportive service needs)

Redetermination of WtW Grant Eligibility

Once an individual is determined WtW eligible and enrolled in the WtW Grant program, the operating entity is not required to redetermine WtW eligibility. For example, if someone ceases to receive CalWORKs assistance due to increased earnings or because of a sanction, that individual may continue to participate in appropriate WtW activities and receive services as long as the services are needed to obtain and retain employment. If a noncustodial parent is participating in a WtW Grant program and the custodial parent and/or minor child (ren) of the noncustodial parent ceases to receive CalWORKs assistance or is excluded from the assistance unit due to a financial sanction, the noncustodial parent may continue to participate in WtW Grant program as long as services are needed by the noncustodial parent to obtain and retain employment.

Coordination Between Family Support Division (FSD) and Tulare County Workforce Investment Board (WIB) to Target and Serve Non custodial Parents (NCPs) Eligible for the

WtW Grant program as a CalWORKs Recipient

A NCP who has had difficulty paying their child support may participate in the WtW Grant program in lieu of being court ordered to comply with a Seek Work Order.

FSD will provide the following services to target, refer, and provide eligibility documentation:

- Screen NCPs for WtW Grant program eligibility criteria.
- Complete the WtW Grant Certification form attesting that the information provided is documented in the case file and/or computerized data system.
- Participants referred to the WID shall include NCPs who have had difficulty in paying their child support obligation and meet the WtW Grant program eligibility requirements.
- Schedule the targeted individuals for a weekly orientation with the WID at the Tulare County Superior Court to coincide with court ordered appointments.

Documentation

For purposes of determining WtW grant eligibility, documentation by TulareWORKs is acceptable for demonstrating that an individual meets eligibility criteria. TulareWORKs will verify the pertinent criteria and will complete the Welfare-to-Work Grant Certification Form (WtW 13a). TulareWORKs will review the participant records contained in both their physical case file and in their computerized case data system to collect, document, and verify that each participant meets the eligibility criteria. TulareWORKs will maintain documentation in the case file to substantiate the WtW eligibility determination contained on the WtW Grant Certification Form (WtW 13a). For the WID records, an appropriately completed certification form will constitute documentation of these eligibility criteria. Any other information required by the WID for participant eligibility, tracking, reporting or demographic purposes will be obtained through the CalWORKs recipient's self-attestation.

It is the responsibility of the WID and TulareWORKs to ensure that eligibility determinations are based on information, which is current at the time the WtW Grant program eligibility determination is made. In lieu of more current information, the WID and TulareWORKs are allowed flexibility to use information about the recipient's barriers to employment and characteristics of long-term welfare dependence that were collected up to six months prior to the WtW Grant program eligibility determination. However, a CalWORKs recipient must be currently receiving TANF assistance on the day the individual is enrolled in the WtW Grant program. TulareWORKs will provide current Gain Information System/ Case Data System printouts to verify a participant is currently receiving TANF assistance (REG1, WPER or WCAS). These printouts will concurrently verify name, date of birth, social security number, alien card number if applicable, and TANF case number.

An eligibility file will contain the following completed forms:

- Welfare-to-Work Grant Certification (WtW 13a)
- REG1 and WPER or WCAS printout
- TABE or CASAs test dated within 6 months of the eligibility (this test may be waived if the

- applicant is monolingual in a language other than English).
- Participant Release of Information Authorization (WtW 01)
- Equal Opportunity (WtW 02)
- Assessment Report (WtW 03)
- Welfare-to-Work Program Narrative (WtW 03)
- Service Provider Feedback Form (WtW 04)
- Welfare-to-Work Application/Registration (WtW 10 EWRP)
- Attachment to WtW Application/Registration Form (WtW 05)
- Welfare-to-Work Enrollment (WtW 20 EWEF)

In the instance a participant's eligibility is being established under the Non-Custodial parent eligibility criteria, then the Family Support Division will be the responsible entity to complete the WtW Grant Certification (WtW 13b) and in doing so, verify that the information on this document is accurate. In addition to the above forms, the following documents will also be in a NCP WtW Grant program eligibility file:

- Welfare to Work Grant Certification (WtW 13b instead of WtW 13a)
- Case Participant Information Screen (DAMCAP1) to verify participant name, social security number, birth date. This screen will also verify the minor child and custodial parent's name, social security number and birth date.
- Participant Information Screen (DAMPAR1) to verify address and phone number.
- Additional Person Info (DANAPI1) or CA Identification Card/Drivers License to verify identity.
- Alien Card or Visa to verify right to work if not a citizen.
- Personal Responsibility Contract

Assessment

An initial assessment will be conducted by the WID directly following the eligibility determination. The assessment information will be gathered through a combination of testing (TABE or CASAs), documentation provided by TulareWORKs or FSD, and self-attestation. Service Providers are encouraged to conduct in-depth assessments once a participant is served in their program.

Referral to Service Providers

The participants will be provided an appointment with an appropriate Service Provider directly following the eligibility and assessment. A WtW appointment letter with the Service Provider name, address, phone number, contact name, and date and time will be provided and a copy retained in the file.

In the WtW Grant program, individuals often have multiple barriers and find it difficult to participate. The Service Provider will be responsible to demonstrate that a reasonable effort has been made to work with as many referred individuals as possible. Case documentation will be kept on all efforts made to contact clients both before and after a participant has been served.

Enrolled versus Served

In order to be enrolled, an individual must be eligible for the WtW Grant program and a current TANF recipient. At the time of registration, the WID will verify receipt of TANF and enroll a

participant into one of the WtW Grant programs. However, if a participant is enrolled into an additional WtW Grant program, a second enrollment form must be completed as a concurrent enrollment. Current TANF receipt must be verified at this time. This will be done by obtaining a current REG1 and WPER printout to document current receipt of TANF and narrating this in the file. The Service Provider must consult with the WID prior to the completion of the concurrent enrollment.

Enrollment into the WtW Grant program is not the same as serving a participant. A participant will be counted as served once a monthly activity form is completed showing activities have been provided. Participants will be shown on the Service Providers' performance measures only once they have been served.

ACTION:

Begin using the information in this Directive as sited above **immediately**.

INQUIRIES:

Please direct questions about this Directive to the Tulare County Workforce Investment Department Administrative Office (559) 737-4246 or 1-800-367-8742.


JOSEPH H. DANIEL
Administrator

JHD:LH



WELFARE-TO-WORK GRANT CERTIFICATION

Participant Name:	Social Security Number:	TANF Case Number:
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Address: (Street, City, ZIP)	Mailing Address, if different:
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Telephone Number:	Birth Date:	Alien Doc# _____
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Gender: M <input type="checkbox"/> F <input type="checkbox"/>	Citizen Yes <input type="checkbox"/> No <input type="checkbox"/>	
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Test Used: CASAS/TABE	Reading grade level: _____	Math grade level: _____
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Welfare-to-Work Eligibility Criteria:

This individual meets the following Welfare-to-Work eligibility criteria for the 70% provision:

1. Current TANF Recipient

AND

2. Have received TANF/AFDC for at least 30 months (does not need to be consecutive)

OR

- Will become ineligible for TANF within 12 months due to their federal 60-month lifetime limits.

COMMENTS:

This individual meets the following Welfare-to-Work eligibility criteria for the 30% provision:

- Current TANF Recipient

- Individual has at least one of the locally determined characteristics associated with or predictive of long-term welfare dependence:

Teenage pregnancy

Disabled

Victim of Domestic Abuse

Single Parent

Substance Abuse

No high school diploma or GED

Poor work history
(Employed full time for fewer than 45 out of the last 52 weeks)

Monolingual in a language other than English

Basic skills deficient
(Reading or math skills below 12th grade level)

SSC Signature: _____

Telephone Number: _____ Date: _____

I authorize the exchange of pertinent CalWORKs/TANF and/or Family Support information between Tulare County Workforce Investment Department, HHS, Service Providers, Family Support Division, WtW Competitive Grantees, state or federal agencies or their representative for eligibility, case management, monitoring and/or auditing.

CalWORKs Recipient: _____ Date: _____

ATTACHMENTS:

TulareWORKS: Current REG1, WPER screens, Casas if under 6 months old, and assessment



NONCUSTODIAL PARENT WELFARE-TO-WORK GRANT CERTIFICATION

Participant Name:	Social Security Number:	TANF Case Number:
Address: (Street, City, ZIP)		Mailing Address, if different:
Telephone Number:	Birth Date:	Alien Doc#
Gender: M <input type="checkbox"/> F <input type="checkbox"/>	Citizen Yes <input type="checkbox"/> No <input type="checkbox"/>	
Test Used: CASAS/TABE	Reading grade level: _____	Math grade level: _____

Welfare-to-Work Eligibility Criteria:

This individual meets one of the four following Welfare-to-Work eligibility criteria for the 70% provision:

- The minor child or the custodial parent of the minor child:
 - Has received CalWORKs/TANF assistance for 30 months or more
 - Will become ineligible for CalWORKs/TANF assistance within 12 months due to federal 60-month lifetime limits
- The minor child is eligible for or is receiving CalWORKs/TANF assistance.
- The minor child received CalWORKs/TANF assistance in the 12-month period before the date of determination, but no longer receives assistance.
- The minor child is eligible for or is receiving assistance under one of the following:
 - Food Stamp Program
 - Supplemental Security Income Program
 - Medicaid
 - Children's Health Insurance Program

COMMENTS:

AND The noncustodial parent meets one of the following:

- Unemployed
- Underemployed
- Having difficulty in paying child support

FSO Signature: _____

Telephone Number: _____ Date: _____

I authorize the exchange of pertinent CalWORKs/TANF and/or Family Support information between Tulare County Workforce Investment Department, HHSA, Service Providers, Family Support Division, WtW Competitive Grantees, state or federal agencies or their representative for eligibility, case management, monitoring and/or auditing.

Non-Custodial Parent Signature: _____ Date: _____

ATTACHMENTS:

Family Support Division: Current Reg1 and WPER screen for minor child or custodial parent, DAMCAP1, DAMPAR, DAMAPI1 screens



Personal Responsibility Contract

As a condition of my agreement to participate in the Noncustodial Parent to Work program, which is designed to assist me to improve my ability to obtain employment and increase my earning capacity,

I _____ further agree to:

- 1) Cooperate in establishing paternity and a child support order, and/or complying with my existing child support order,
- 2) Commit to paying and/or modifying an existing order of child support, if changes in my personal earnings or family make-up affect my financial circumstances, and
- 3) Participate in employment and related activities to increase my ability to pay child support on a regular basis. *
(*If I am under 20 years of age, this may include educational related activities for the attainment of a high school diploma or GED.)

I will also work toward obtaining or retaining employment, and increasing my earnings and contributions that will help assure the well-being of my child(ren) by:

- 1) Cooperating with all program staff in all testing, evaluation and case management activities
- 2) Attending up to a two-week job readiness class to learn effective job seeking and retention skills
- 3) Obtaining and retaining employment, increasing earnings, and enhancing the financial and emotional contributions to my child(ren)
- 4) Continuing to participate after obtaining employment by communicating with case management staff, attending post-employment workshops when appropriate, attending basic education or vocational training if needed

Non-Custodial Parent (NCP)
Signature

Date

The above NCP has attended a Personal Responsibility Workshop presented by:

Family Support Division
Representative Signature

Tulare County Workforce
Development Department
Representative Signature

Community Services & Employment Training
Attn: Carolyn Rose
P.O. Box 1350
Visalia, CA 93291

Proteus, Inc.
Attn: Michael McCann
1900 E. Mineral King
Visalia, CA 93291

Tulare Adult School
Attn: Dan Neppel
575 West Maple
Tulare, CA 93274

Valley Education Foundation
Attn: Michael Cortes
204 East Oak Street
Visalia, CA 93291

Tulare County Office of Education – S.E.E.
Attn: Lorene Valentino
916 West Oak Street, Suite F
Visalia, CA 93291

College of the Sequoias
Attn: David Maciel
915 South Mooney Blvd.
Visalia, CA 93277

Visalia City Coach
Attn: Monty Cox
315 East Acequia
Visalia, CA 93291

Visalia Adult School
Attn: Caroline Cassida
3110 East Houston Ave
Visalia, CA 93291

Able Industries
Attn: Wendy Ayers
2525 South "K" Street
Tulare, CA 93274

mailed

10-10-00