CalFresh Employment & Training (CFET)

Partner Handbook

Serving the County of San Diego

Updated: November 2022

San Diego
Workforce
Partnership

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1. BACKGROUND

The San Diego Workforce Partnership (SDWP) is one of several agencies eligible to provide the CalFresh Employment and Training (CFET) program in the County of San Diego. SDWP leverages existing employment and training programs within the city and county to create a strong network of available programs. **This network helps CalFresh participants as they work on gaining the skills and training necessary to find and retain high-quality employment on their path towards self-sufficiency.** CFET program providers are community organizations contracted by SDWP to deliver allowable employment and training (E&T) programs and services to CalFresh recipients. This handbook provides a standard set of policies and guidelines for CFET partners.

1.A. CALFRESH BASICS

The Food and Nutrition Service (FNS) is the federal agency responsible for administering and funding the Supplemental Nutrition Assistance Program (SNAP), which is authorized by the Food and Nutrition Act of 2008, as amended, and was reauthorized by the Agriculture Act of 2018. SNAP helps people with low incomes, who meet federal income and resource guidelines, by providing a monthly benefit to supplement their monthly food budget.

SNAP is called CalFresh in California. In the County of San Diego, CalFresh benefit eligibility is determined by staff within the County of San Diego Health and Human Services Agency (HHSA).

SNAP has an Employment and Training (E&T) program to help recipients gain skills and experience with employment. In California, this program is referred to as CalFresh E&T or CFET.

HHSA has contracted with SDWP to provide CFET services in San Diego. SDWP partners with a wide variety of agencies - employers, universities, and community-based organizations (CBOs) - to provide a robust set of services and programs, thereby broadening their reach and the CFET program's impact.

> The goal of CFET is to help CalFresh recipients on their journey to self-sufficiency by helping them gain and maintain employment with a livable wage.

Each county in California has the discretion and flexibility to design a CFET program that best fits the needs of their local community. Plans may be amended during the year.

At a minimum, a CFET program must:

- ✔ Provide an orientation
- ✔ Have an intake assessment to assess barriers, goals, and interests
- ✔ Develop an individualized employment plan
- ✔ Provide case management
- ✔ Issues supportive services to participants

2. SAN DIEGO CFET PROGRAM

SDWP is the designated contractor to administer and provide CFET in the County of San Diego. SDWP has contracted with Public Consulting Group (PCG) to administer some portions of the CFET program. Roles and responsibilities for SDWP and PCG are outlined below:

SDWP	PCG
• Overall program operation and monitoring • Liaison to HHSA • Answer questions submitted by PCG • Establish new partners • Signatory for partner agreements	• Administer CFET program • Request/receive invoices and documentation • Work with partners for corrections/ clarifications • Calculate reimbursement • Submit invoices to SDWP • Primary Point of Contact for providers • Monitoring support

2.A. PROGRAM CONTACTS

Name	Role	Phone	Email
Megan Rymski	Consultant, PCG	303-994-5640	mrymski@pcgus.com
Shaina Gross	Vice President, Client Services, SDWP	619-228-2911	shainagross@workforce.org
Haley Stayton	Program Specialist IV, SDWP	619-228-2996	haleystayton@workforce.org

2.B. SAN DIEGO CFET PROGRAM DESIGN

The San Diego CFET program consists of community organizations and training institutions that partner with SDWP to deliver allowable employment and training services to participants. SDWP uses a reimbursement model to fund CFET. In this model:

- FNS reimburses SDWP 50% of the cost incurred to administer and support participants in allowable SNAP E&T program activities.
- Of the 50% reimbursement, SDWP applies a 15% administrative cost.
- The remaining 35% is paid back to the CFET partner providing the activities for which the reimbursement was claimed.
- CFET Reimbursement flow…
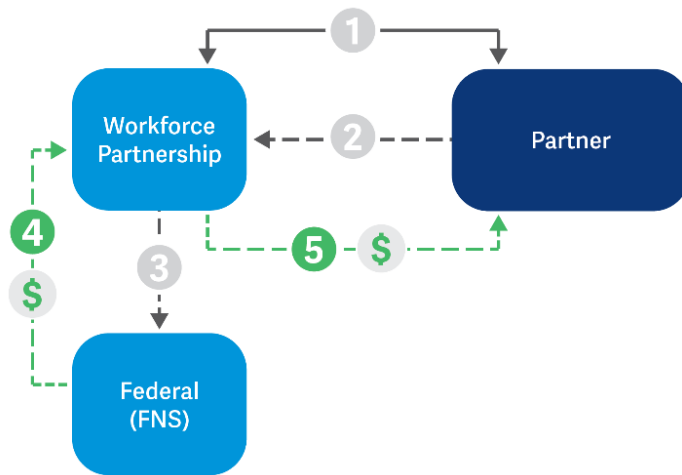
1. Workforce Partnership and partner enter into partnership.

2. Partner serves CalFresh participants and submits expenditure documentation to the Workforce Partnership through PCG.

3. Workforce Partnership submits expenditure documentation to FNS through the County.

4. FNS issues 50% reimbursement to Workforce Partnership.

5. Workforce Partnership holds 15% for administrative costs and passes remaining 35% to partner.

2.C. STEPS TO BECOMING A CFET PARTNER

A guide through the process of identifying if your program(s) is a good fit.

☐ Become familiar with CFET requirements by reviewing the CalFresh Employment & Training Partner Handbook.

☐ Assess if the programs/services provided by your agency may qualify as allowable CFET activities.

☐ Determine if your agency can cover 100% of the costs associated with the program/activities your agency thinks may qualify for CFET. Assess if you can financially sustain your program while waiting for reimbursement.

☐ Evaluate if your agency is currently serving or can recruit CalFresh participants or potentially eligible CalFresh participants.

☐ Evaluate your agency's ability to accurately track and allocate costs associated with the CFET program and maintain acceptable documentation of all costs subject to reimbursement.

☐ If you will be requesting reimbursement for staff, evaluate your agency's ability to accurately track and allocate staff time associated with the CFET program.

☐ Contact PCG to set up an informational interview.

2.D. ELIGIBILITY & FUNDING

An interested agency may be eligible to participate in the CFET program if it:

- ✓ Has a source of non-federal funding which can be used to operate OR stand and maintain a program

- ✓ Serves enough CalFresh recipients or potentially eligible CalFresh recipients

- ✓ Can market the services and attract enrollees into the program

- ✓ Has the necessary staff and administrative infrastructure to perform client tracking, billing, and cost allocation

- ✓ Can comply with state audits, reviews, and performance standards

- ✓ Can tap new/existing sources of non-federal or state funding to expand the program

The only federal funding eligible for reimbursement under CFET is Community Development Block Grant (CDBG) funds. Funds used by the CFET partner to leverage the 50% reimbursement **cannot** originate from a federal source and **cannot** supplant another source. Allowable non-federal funding sources:

Private donations

State, county, city funds

Foundation funds

Social venture/ enterprise revenue

Low-income student support / Tuition set-aside resources

State worker retraining dollars
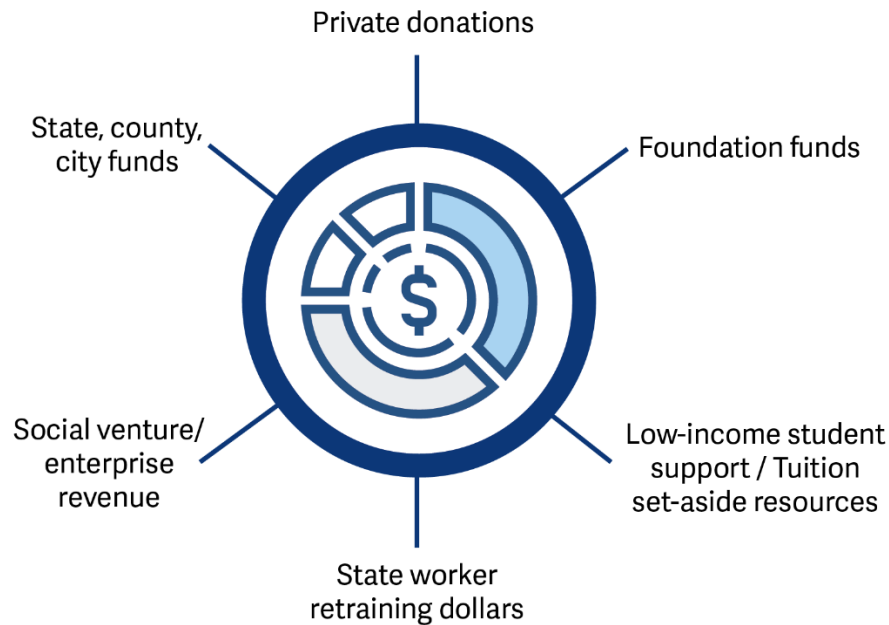
Funding a CFET program may be difficult for some potential partners, especially for those without existing connections to foundations or other donors. Given the strict rules around eligible funding sources, it is particularly important that partners can verify the funding sources that they will use to fund the CFET program, and that funding and spending can be tracked and documented to each expenditure.

🔍 **Match and Reimbursement Models**

The figure below describes the difference between a reimbursement and match model. Funding for CFET follows the reimbursement model, described below.

Reimbursement Model
- Funds for allowable activities must be expended, after which FNS issues a reimbursement for 50% of the expenditures.

Match Model
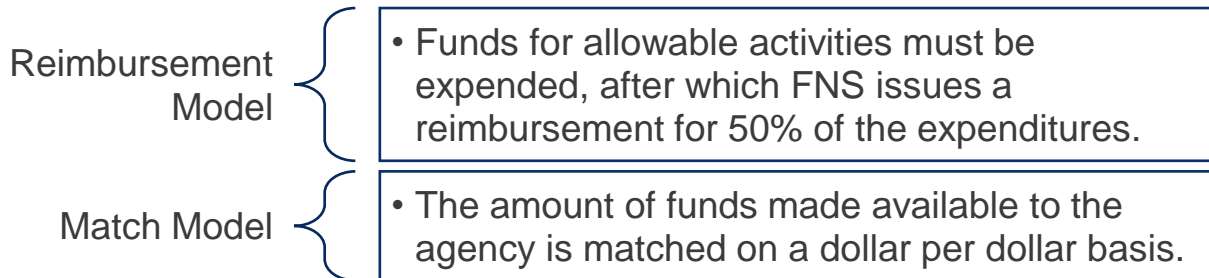- The amount of funds made available to the agency is matched on a dollar per dollar basis.

The CFET provider can spend their reimbursement however they would like.

- The CFET reimbursement is considered a "local" fund source, not federal funds.
- A CFET provider can elect to use the reimbursed funds back into their CFET program(s), which is referred to as reutilizing funds.
- Any reutilized funds must be spent on valid CFET costs and must be identified as a unique funding source when invoiced.

2.E. SERVICE AGREEMENT

Agencies interested in partnering with SDWP to become a CFET partner should contact the SDWP contacts identified on page five, Program Contacts. SDWP and PCG will schedule an informational interview to learn more about the program(s) and assess if the program meets CFET program requirements.

Eligible agencies will be asked to sign two documents prior to being considered a CFET partner:

- Certification form that funding is not federal funds or used as a match
- Service Agreement. The Service Agreement is between the agency and SDWP and it outlines the expectations and responsibilities for both agencies.

2.F. MONITORING

All CFET partners are monitored both programmatically and fiscally. Monitoring includes:

1. Compliance with the terms of the Service Agreement,
2. Confirming adherence to County and SDWP policies,
3. Verifying the delivery of goods and services, and
4. Ensuring that federal SNAP E&T rules and regulations are followed.

SDWP (and/or PCG on behalf of SDWP) can perform monitoring at any time. **At a minimum, providers will be monitored annually.** This monitoring is required by FNS and the Federal Single Audit Act. CFET

partners will be provided written notice and further instruction in advance of the monitoring. Supporting documentation for selected invoices and expenditures will be reviewed to ensure they are allowable and allocable per the Cost Principles at 2 CFR 200.

In addition, all CFET partners are subject to auditing by FNS to ensure all appropriate laws, rules and procedures are being followed. This may involve auditing of client case files, whether electronically or on-site, and surveying of the contractor and/or participants.

CFET Partners must take all available actions to safeguard participant information. Participant information should never be sent in an unsecure email. The participant roster must always be submitted through the PCG established FTP site.

2.G. CIVIL RIGHTS

All CFET partners must display the "And Justice for All" poster prominently in areas where potential CalFresh recipients can see it. Posters can be obtained through SDWP.

All materials that are printed using FNS funds, paper or electronic, must include the USDA Non-Discrimination Statement (NDS). In some instances, when space is limited, you may use "This Institution is an equal opportunity provider" in place of the entire NDS. In addition, all partners receiving FNS funding must have a link to the NDS on their organization's website.

Should My Agency Initiate a CFET Program?

Consider the following questions if you are trying to decide whether to initiate a CFET program:

- Does my agency have a source of non-federal funding which can be used to start OR maintain the program? Can my agency verify which funds we will use each month?
- Are there enough CalFresh recipients in need of my agency's services to create a program?
- How will my agency market the services and attract enrollees into the program?
- Does my agency have the necessary staff and administrative infrastructure to perform client tracking, billing, and cost allocation?
- Is my agency willing to comply with state audits, reviews, and performance standards?
- Can my agency tap new/existing sources of non-federal or state funding to expand the program to serve unengaged CalFresh participants?

A program does not need to be brand new in order to qualify as a CFET program. In many instances, existing programs meet the criteria above and need modifications to qualify as a CFET program.

3. CFET PROGRAM REQUIREMENTS

An individual must be receiving CalFresh to participate in CFET. This does not mean that a partner cannot provide services to non-CalFresh participants. It means that the partner cannot receive any reimbursement from FNS for associated costs of serving non-CFET participants. Reimbursable services may begin as early as the date CalFresh benefits are approved.

3.A. WHO CAN PARTICIPATE IN CFET?

California currently operates a voluntary E&T program. This means that CalFresh recipients must volunteer to participate in CFET. This model can make the partnership more meaningful and rewarding for both parties. Any failure to comply with CFET program requirements will not negatively impact a recipient's CalFresh benefits.

Not every interested CalFresh recipient can participate in the CFET program[1]. The table below shows the difference between who can and cannot participate:

✓ Can Receive CFET Services	✗ Cannot Receive CFET Services
• Are age 16 or older. • Have the physical and mental ability to work at least 20 hours per week, or able to do so within the next year. For individuals with a verified disability, such as active Supplemental Security Income recipients or temporary workers compensation recipients, client statement or client provided documentation can be used to determine CFET eligibility. • Can participate in CFET immediately.	• Are receiving CalWORKS

🔍 Serving Youth

16- and 17-year old CalFresh recipients may volunteer for CFET. For expenses associated with these participants to qualify for a reimbursement, the following must be true:

- The program can demonstrate a prompt path to employment
- The participant must be old enough to work upon completion of the program.
- The service must not already be available through a State entitlement program, for example services available through the State school system.

Both the minor and their parent/legal guardian must sign the Voluntary Enrollment Form.

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[1] SNAP E&T Toolkit, pg. 10. Retrieved from: https://fns-prod.azureedge.net/sites/default/files/ET_Toolkit_2013.pdf

3.B. CALFRESH ENROLLMENT AND REFERRAL

1. CFET partners are only eligible for a reimbursement on expenses incurred for a participant that received CalFresh in the same month as the services rendered.
2. All participants must sign the CFET Voluntary Enrollment Form when they start participating in the program. If there is a break in participation, a new form must be signed.
3. A CFET partner will not be reimbursed for services rendered to participants who do not knowingly acknowledge and agree to participate in CFET.

CalFresh participants can be enrolled in CFET in two ways...

3.B.1 Traditional Enrollment

CalFresh recipient volunteers to participate in CFET when applying for CalFresh. The county screens the recipient to see if they are a work registrant and if they are interested in participating. If they are, the worker will refer the individual to the County E&T Social Workers, who will help determine which program(s) best suits them. This is demonstrated in the graphic below:

Individual applies for CalFresh	➡	Individual volunteers for CFET	➡	County refers individual E&T Social Worker	➡	Individual contacts partner to enroll

3.B.2 Request For Referral

Most CalFresh recipients will come to the CFET partner first – this is referred to as a request for referral (previously known as a reverse referral). To maximize the potential for reimbursement, a CFET partner may choose to assess incoming participants for CalFresh eligibility and make program enrollment decision based on that assessment. If the participant appears potentially eligible for CalFresh, the CFET partner should instruct and support them to apply for CalFresh benefits. The partner will not be able to submit reimbursement for any expenditures related to that participant until they are receiving CalFresh.

Individual enrolls with CFET partner	➡	CFET partner suggests applying for CalFresh	➡	Individual applies for CalFresh	➡	CFET partner requests reimbursement

3.B.3 Reverse Enrollment & General Enrollment

A CFET partner is not prohibited from working with a participant who is not actively receiving CalFresh; however, the partner will not be reimbursed for this participant.

3.C. COMPONENTS

The goal of CFET is to help CalFresh recipients improve their employment prospects and wage potential. To meet that goal, CFET programs must be designed in a manner that helps participants move promptly into employment. Each program can be uniquely designed and a CFET partner does not need to provide all the activities that are currently being offered in the County. Approved components include:

3.C.1. SUPERVISED JOB SEARCH

A CFET supervised job search program operates in a location that has been approved by the County of San Diego. Sites must be able to supervise and track the activities of participants within the program.

- **Activities**
  Participants may complete job search activities on their own, with one-on-one assistance, or in a group setting. Examples of activities include creating or revising a resume and submitting job applications.

- **Resources**
  A job search site must have resources readily available that assist participants in job searching. These could include phone banks, job orders, direct referrals to employers, and either a resource room or computers that would allow participants to see state/local databases of open positions that are coordinated through a career center or general job search engine.

- **Staffing**
  Job search sites must be staffed by employees who are skilled in providing guidance and support to individuals so they can find suitable employment through their job search activities. Staff must be able to provide some level of direct supervision, which at a minimum, includes connecting with participants at least monthly. Staffing can be conducted in a variety of modes, including remote, so that it complements the job search location.

- **Approval Process**
  SDWP submits proposed sites for approval to HHSA on an as needed basis. Submissions will include short descriptions of the site, including activities, resources, and staffing, and pictures (if appropriate). SDWP will email submissions to the County, who will respond by email within two weeks with an approval, denial, or request for additional information. If the site is not approved the county will include the reason for denial, and if necessary, what should be changed so the site can be approved.

- **Location**
  Job search sites may be in a physical location or done remotely. A remote location can be considered suitable when the participant has access to the tools that they need to perform job search activities. An online resource, such as an electronic database, does not meet the requirements of direct supervision.

3.C.2. JOB RETENTION

A CFET provider can provide services to a CFET participant who has secured employment **after participating in a CFET component**. These types of services are geared towards helping the participant achieve satisfactory performance, retain employment, or to increase their earnings over time.

Examples of allowable services or reimbursable costs include, but are not limited to:

- Case management,
- Life skill classes,
- Referrals to other services,
- Dependent care assistance,
- Transportation assistance,
- Clothing required for the job,
- Equipment or tools required for the job,
- Test fees,
- Union dues,
- Licensing and bonding fees.

Job retention services must be provided for at least 30 days but may not exceed 90 days. An agency can provide job retention even if the participant is no longer receiving CalFresh.

3.C.3. EDUCATION

Educational programs or activities improve the basic skills or increase a participant's employability. The partner must show that there is a direct link to job-readiness or the program must involve articulated career pathways or stackable credentials that can ultimately lead to employment.

Allowable programs include:

- **Basic/Foundational Skills Instruction** – Programs that offer instruction and services below the postsecondary level. These increase a participant's ability and skills so that they may attain a secondary school diploma or its recognized equivalent; transition to postsecondary education and training; and obtain employment. Includes Adult Basic Education (ABE), basic literacy, and high school equivalency (GED, TASC, HiSET, or other).
- **Career/Technical Education Programs or Other Vocational Training** – Activities at the postsecondary level to assist individuals with the academic or technical knowledge and skills needed to prepare for further education or for a career in current or emerging employment sectors. Ideal programs are those that are employer driven and that lead to industry-recognized certificates or credentials.
- **English Language Acquisition** – Activities that help an English Language learner to achieve competence in the English language.
- **Integrated Education and Training/Bridge Programs** – Programs that provide adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or group of occupations for the purpose of educational and career advancement.
- **Work Readiness Training** – Intensive programs that include skills assessments and educational remediation services. They are designed to prepare individuals for the workforce. May include both foundational skills and soft skills.

3.C.4. WORK EXPERIENCE – WORK BASED LEARNING

Work Experience is designed to improve the employability of a participant through work experience and/or training with the goal of helping move the participant into regular employment.

Examples of Work Experience – Work Based Learning programs include

- **On-the-job Training** – A work placement in a public, private non-profit, or private sector employer/program. Must be limited to the amount of time required for a participant to become proficient in the occupation.
- **Pre-Apprenticeship/Apprenticeship** – Combination of on-the-job training and related instruction. Participants learn practical and theoretical aspects of a skilled occupation. Pre-

apprenticeship programs provide the training or skill development necessary for a participant to enter into an Apprenticeship program.

- **Internship and Work Experience** – a planned, structured learning experience that takes place in a workplace for a limited period of time.

3.C.4.a. Subsidized Work Based Learning Program

As of October 2021, the wages paid for participants enrolled in a subsidized work-based learning program. Requirements for these types of programs include:

- A planned, structured learning experience in a workplace or simulated environment.
- Include sustained interactions with industry or community professionals in a real world or simulated environment.
- Foster in-depth firsthand engagement with the tasks required in each career field.
- Be aligned with a curriculum (i.e., an instructor's plan for providing training and skill development) and instruction.
- Emphasize employer engagement in the development and/or execution of the training.
- Have specific training objectives (i.e., goals for what a participant is expected to learn and be able to do by the completion of the training).
- Follow an articulated and documented path that leads to regular, unsubsidized employment.
- Pay the individual a wage at least equal to the State or Federal minimum wage, whichever is higher. Note this refers to the wage including the subsidy.
- Operate in compliance with all applicable labor laws.
- Not displace or replace existing employment of individuals not participating in E&T.
- Provide the same benefits and working conditions as non-E&T participants doing comparable work for comparable hours.[2]

3.C.4.a.i. Eligible and Ineligible Costs

The table below outlines which costs/benefits are both eligible and ineligible for reimbursement:

Eligible for Reimbursement	Not Eligible for Reimbursement
Wages earned through participation in the program	Benefits such as health and dental
Wages paid for classroom training or simulated work that readies participants for employment	Bonuses and other incentive payments (e.g. recruitment and retention bonuses, performance based bonuses)
Stipends paid as a form of a wage	Life insurance
Workers' compensation	Disability insurance
Payroll taxes paid by the employer	
Direct and indirect costs associated with training and administering the program	

The funding source for the wages must be considered an eligible source, as outlined in section 2.D.

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[2] SNAP Employment and Training Subsidized Work-Based Learning Activities memo (November 17, 2021)

3.C.4.a.ii. Program Design

There is no time limit for how long a participant can receive a subsidized wage, however, the goal of subsidized work based learning program should be to promptly move a participant into an unsubsidized job. Most subsidized wage programs should last between 90 days and six months. An exception are registered apprenticeship programs, which may require participation for longer than six months.

Wages paid under a subsidized work based learning program are countable against the CFET participants CalFresh benefits. CFET partners should consider both the amount of the wage as well as the number of hours in the program.

3.C.5. NON-COVERED COMPONENTS

The following activities/services are never covered by CFET and therefore ineligible for reimbursement:

- Four-year college
- Transfer degrees
- Stipends provided in certain training programs

3.C.6. CASE MANAGEMENT

CFET partners must provide case management to program participants. At the start of a program, case management must include:

- Orientation
- Comprehensive intake and employability assessment, and
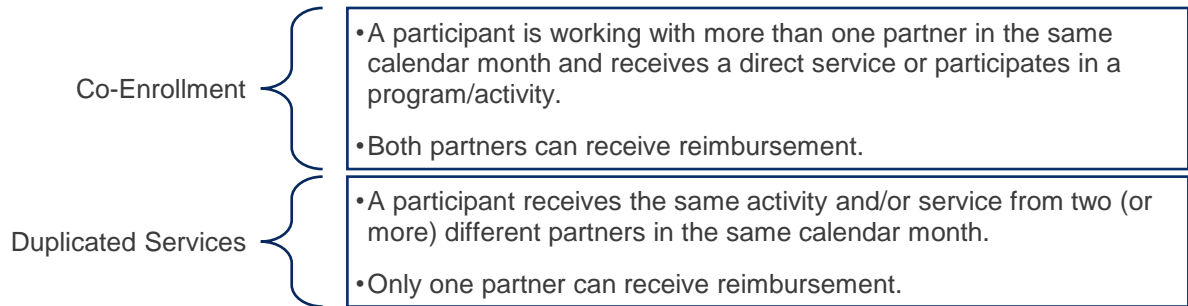- Development of an individualized employment and training plan

Ongoing case management will look different for each partner. At a minimum, the partner must monitor and document participant progress in the form of monthly case notes. Eligible individuals can participate in more than one component and expenses can be reimbursed for all components.

3.D. PROGRAM AVAILABILITY AND CHARGES

The CFET partner must have uniform standards for their program(s) for all participants and provide services to the community as specified in their organizational mission regardless of any contracts with SDWP. Partner services, available funding, and participant expenses must be the same for CFET participants and non-CFET participants. If a service is offered at no cost to non-CFET participants and it is not allocated to any other grant, a CFET partner cannot charge the CFET program for this service. CFET participants are expected to receive the same services and supervision as non-CFET participants and must meet the same expectations to successfully complete the program.

3.E. CO-ENROLLMENT AND DUPLICATED SERVICES

CFET partners are highly encouraged to work together to provide a holistic set of services and programs to CalFresh recipients. This can result in a participant being co-enrolled with more than one partner. Co-enrollment is different than duplicated services, which are not eligible for reimbursement.

Co-Enrollment

- A participant is working with more than one partner in the same calendar month and receives a direct service or participates in a program/activity.
- Both partners can receive reimbursement.

Duplicated Services

- A participant receives the same activity and/or service from two (or more) different partners in the same calendar month.
- Only one partner can receive reimbursement.

It is the responsibility of the CFET partner to collaborate with other CFET partners so that a participant is not receiving duplicated services and/or activities.

Collaboration and Referrals

SDWP encourages CFET partners to collaborate and make referrals for services that are not available through their own organization. Each partner serving a participant can receive the reimbursement for allowable expenditures that are not duplicative.

4. ENROLLMENT AND PARTICIPANT MAINTENANCE

4.A. INTAKE AND PLAN

Each partner should offer an orientation/intake meeting that outline program expectations. It may cover topics like attendance policies, program length, and what success looks like. Orientations may be done in a group setting or with individual participants. At a minimum, the partner must provide documentation that outlines program participation expectations and requirements. The goal of the orientation and documentation is to help prepare the participant for a successful outcome.

4.A.1. PARTICIPANT PLAN

Partners must create an individualized Participant Plan (often referred to as an Individual Employment Plan, or IEP) for each participant. It is an ongoing strategy that is developed jointly by the participant and the case manager around employment and training-related goal setting for participants.

Participant Plan's should address questions such as:

- "What are my employment goals?"
- "How am I going to reach my goals?"

Participant Plans include check-ins with case manager(s) and staff to assess progress and determine if goals have been met, or if participant needs to course correct. Participant Plans serve as an accountability system for participants and their case managers.

4.A.1.a. Participant Plan Goals

Recommended methodologies for establishing participant goals include both STAR and SMART.

STAR	SMART
• Specific - it is linked to one activity, thought, or idea.	• Specific - linked to one activity, thought, or idea.
• Trackable - performance can be tracked and monitored.	• Measurable - something that can be tracked and progress measured.
• Attainable - goals can be reasonably reached but also stretch goals.	• Actionable - there should be clear tasks or actions that can be made to make progress toward a goal.
• Relevant - the goal is relevant to what the participant wants.	• Realistic - it is possible to achieve.
	• Timely - should fall within a specific time period.

4.A.1.b. Participant Plan Example Data Points:

The following are example Participant Plan data points to capture in the participant's case file at intake, with progress case notes added over time.

- **Participant's Employment Goals –** STAR or SMART goal Statement(s)
- **Achievement objectives** – major milestones that must be achieved in order to attain the goal
- **Services** - combination of services for the participant to achieve the employment goals. Services must be traceable to results from employability assessment, evaluation, and identified occupational training needs. Case Manager(s) should determine the obstacles that the participant needs to address and overcome to attain their employment goals(s) and how each barrier will be addressed and by whom.
- **Timeframe** - for achieving each recommended service. Serves as means for ensuring appropriate planning.
- **Status -** Staff should be entering case notes on progress towards goals.

A copy of the Participant Plan must be kept in the case file. Partners may request to use a different plan.

4.B. VOLUNTARY ENROLLMENT FORM

Since the CFET program is a voluntary program, participants must explicitly volunteer to participate. All CalFresh recipients must complete the voluntary enrollment form to acknowledge that they want to participate in the program before reimbursements for their expenditures can be requested. This form must be completed when a participant enrolls and if there is a break of more than thirty days in program participation. A copy must be kept in the case file and submitted to PCG with the monthly invoice.

Partners are encouraged to have all program participants <u>sign the voluntary enrollment form</u>, regardless of their CalFresh participation status when they begin receiving services. This will help as partners work towards increasing the number of participants in their program receiving CalFresh, which will in turn, increase the amount of their reimbursement.

4.C. CASE FILES

Partners must keep case files for all participants. They may be kept in paper or electronic formats or a combination of both. Files will be reviewed as a part of the annual monitoring process. Case files may be organized based on the partners own standards but must contain at least the following information:

- Assessment form
- Release of information/consent form (if applicable)
- Voluntary enrollment form
- Participation Plan (IEP)
- Job log (if the participant is enrolled in Supervised Job Search)
- Participant progress updates
- Participant reimbursements (if applicable)
- Program dates and participation/attendance
- Employment outcomes
- Case notes, as necessary

Case files must be retained for a minimum of three years after the participant exits the program.
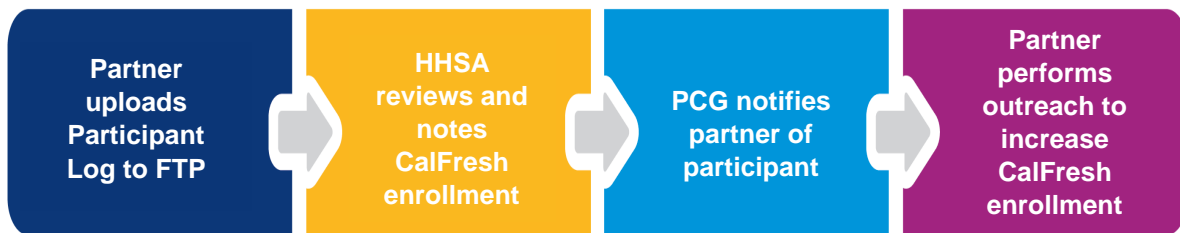
4.C.1. VERIFICATION OF PARTICIPATION

The partner must monitor and verify participation in program(s) and services for everyone enrolled. Monitoring includes collecting documentary evidence of the participation monthly. Documentation needs to include the participant's name and the name of the individual who is verifying the information.

4.D. PARTICIPANT LOG

CFET partners will fill out and submit a participant log monthly which is used to determine which participants were receiving CalFresh so that expenses can be correctly included in the reimbursement.

Partners can complete a participant log as new participants enroll in the CFET program or as they start a program. This will help partners learn who is currently receiving CalFresh and who need to be referred to the county to apply for CalFresh. CFET Program Participant Log Flow…

Partner uploads Participant Log to FTP → **HHSA reviews and notes CalFresh enrollment** → **PCG notifies partner of participant** → **Partner performs outreach to increase CalFresh enrollment**

4.E. PARTICIPANT PROGRESS

Partners must monitor and document participant progress in component(s) at least once per month. This will help SDWP to determine whether a component is meeting the purpose of the CFET program, which is to make participants more employable. Partners must report on two types of data: demographic/service reporting and outcome objective reporting.

4.E.1. DEMOGRAPHIC AND SERVICE REPORTING:

- Social Security Number
- Date of Birth
- Gender
- English as a Second Language
- Possession of a high school degree or GED prior to being provided with E&T services
- Placements and retention in each service/component including component start and end date
- Enrollment, completions, certifications, etc.

4.E.2. OUTCOME OBJECTIVE REPORTING:

Partners must report out on participant outcomes when a participant exits the program. Outcomes must be reported monthly and measures are included in the Participant Log. The required outcomes and their definitions are outlined below:

Outcome	Definition
Exit Reason	Successfully completed if the participant ended the program/component satisfactorily. Dropped out is if the participant voluntarily left the program prior to its end date.
Outcome	What is the participant's status at program end: employed, apprenticeship, or unemployed, enrolled in postsecondary or other education and training program.
First Credential/Certificate Name*	If the participant attained credentials, which one? If not, leave blank.
Second Credential/Certificate Name*	If the participant attained credentials, which one? If not, leave blank.
Third Credential/Certificate Name*	If the participant attained credentials, which one? If not, leave blank.
Industry	If the participant is employed after ending the program, what industry are they in? Choose from drop down.
Wage Rate	If the participant is employed after ending the program, what is their hourly wage?

CFET program only counts enrollment once per participant per component unless a break in CFET service lasts a minimum of 180 days. If the break of service lasts a minimum of 180 days, consider the individual a new CFET participant upon enrollment.

5. FISCAL

SDWP uses a third-party reimbursement model to fund CFET. FNS will only provide reimbursements on expenditures that originated from eligible funding sources. The requirements for the funding sources that are eligible for reimbursement are:

- The funds **cannot** originate from a federal source, <u>except for CDBG funds</u>.
- The funds **cannot** supplant another funding source or be used as a match for a federal source

SDWP's Service Agreement includes a statement about the origination of the CFET partner funding. Additionally, PCG will ask the CFET partner to verify the origination of their funding source(s) on each invoice. CFET partners can use non-eligible funding sources to operate their program. It is encouraged that the partner use funds from non-eligible sources on participants who are not eligible for reimbursement.

5.A. CFET EXPENSES

CFET expenses must be directly related to an approved component and be reasonable and necessary. FNS has outlined cost principles and guidance on the types of expenses that are eligible in the administration of an E&T program and those which are eligible for 50% reimbursement. FNS specifically states that expenditures must:[3]

- Be valid obligations of the CFET partner.
- Be necessary, reasonable, and allocable charges that are outlined in the approved E&T plan.
- Be directly related to an approved E&T Program activity;
- Not be for used in an attempt to overcome a barrier to participating in CalFresh, where participation would make the individual exempt from the Federal work registration requirement. An example is participation in a drug or alcohol treatment and rehabilitation program.[4]
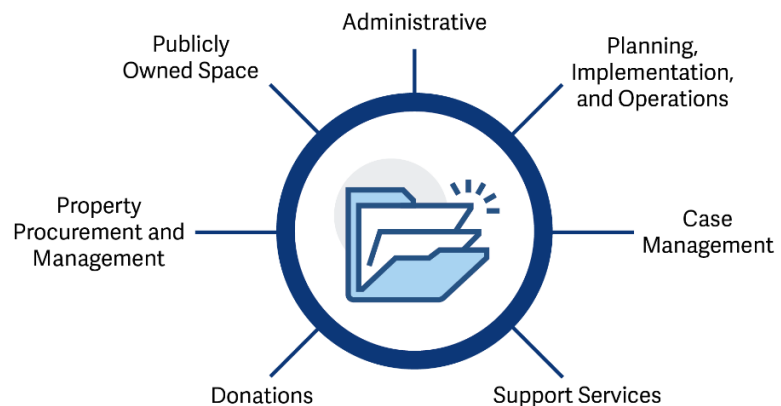

FIGURE 6: CATEGORIES FOR CFET EXPENDITURES

CFET expenditures can fall into seven categories. Each are described in more detail below.[5]

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[3] SNAP E&T Toolkit, pg. 67. Retrieved from: https://fns-prod.azureedge.net/sites/default/files/ET_Toolkit_2013.pdf
[4] Ibid.
[5] SNAP E&T Toolkit, Appendix C: Cost Principles. Retrieved from: https://fns-prod.azureedge.net/sites/default/files/ET_Toolkit_2013.pdf

5.A.1. ADMINISTRATIVE EXPENSES

Expenses related to the overall administration of the CFET program. The largest administrative cost is salaries and benefits of personnel involved in CFET.[6]

✓ Allowable Administrative Costs	✗ Unallowable Administrative Costs
- Salaries and benefits of personnel involved in SNAP E&T. - Office equipment, supplies, postage, duplication costs, and travel that is necessary to carry out the program's objectives. - Development and production of SNAP E&T materials when no other appropriate materials exist. - Lease or rental costs. - Maintenance expenses. - Other indirect costs. - Charges for travel for the purpose of fulfilling the approved plan based on official State, local or university travel regulations.	- Bad debts, uncollected accounts or claims, and related costs. - Contingencies or contributions to an emergency reserve or similar provision for unforeseen events. - Contributions and donations. - Entertainment costs that are primarily for amusement or social activities. - Fines, penalties, and legal fees for failure to comply with Federal, State, or Local laws. - Indemnification or payments to third parties and other losses not covered by insurance. - Under recovery of costs under Federal Funding Agreements- shortfalls in one grant cannot be charged to another Federal grant. - Alcoholic beverages. - Advertising and public relations, unless used for recruitment of staff, acquisition of materials for the grant, or publishing the results of the grant. - Commencement and convocations. - Goods and services for private use. - Housing and personal living expenses. - Interest, fund raising, and investment management. - Scholarships and student aid. - Student activity costs. - Travel- allowable but with restrictions as to amounts involved, level or transportation costs, etc.

5.A.1.a. Time Reporting

Weekly time and effort reporting are required by FNS for staff paid with CFET funds and those contributing to this work through cost share[7]. Time and effort sheets can be certified in bulk and transmitted electronically (up to 20 sheets per transmittal) with a supervisor's electronic signature.

How staff time must be reported depends on if the staff person is 100% devoted to CFET or not:

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[6] Ibid.
[7] FNS Toolkit, p. 59. Retrieved from: https://fns-prod.azureedge.net/sites/default/files/ET_Toolkit_2013.pdf
See also 2 CFR 225.

100% Allocated	• A semi-annual time and effort certification by a supervisor is required • After-the-fact reporting is unacceptable.
Less than 100% Allocated	• 100% time reporting is required unless using Random Moment Time Sampling. • Time worked should be reported in hours and not percentage of time to CFET. Only time spent on CFET needs to be entered on the form. • Time and effort forms must be maintained at the work site and must be available for review/audit for a period of three years.

5.A.1. Planning, Implementation, And Operations

Costs that are associated with the planning, implementation, and operation of a CFET program are generally allowable for reimbursement:[8]

✓ Allowable Planning, Implementation, and Operations Costs	✗ Unallowable Planning, Implementation, and Operations Costs
Includes things like • Hiring a consultant to improve administration. • Advertising costs that are done for the procurement of goods and services. • Marketing the E&T program. • Salaries for third-party partners as well as State agency administration of E&T.	• Determining whether an individual must be work registered. • The work registration process. • Any screening performed during the certification process. The certification process is considered ended when an individual is referred to an E&T activity for assessment or participation. • Any sanction activity that takes places after the operator of an E&T activity reports noncompliance without good cause. • Subsidizing the wages of participants, or to reimbursement participants.

5.A.2. Advertising

Some advertising expenses are eligible for reimbursement (e.g., marketing of their program to potential participants, creation and printing of materials). Content on TV or the radio is excluded.

Printed materials that are paid for with CFET funds must include the USDA Nondiscrimination statement. The final sentence of the nondiscrimination statement can be used instead of the whole nondiscrimination statement if it will not fit on the printed material.

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[8] SNAP E&T Toolkit, Appendix C: Cost Principles. Retrieved from: https://fns-prod.azureedge.net/sites/default/files/ET_Toolkit_2013.pdf

5.A.3. Case Management

Reimbursement of these activities are allowed. Examples:

- Orientation
- Comprehensive intake and employability assessment
- Development of an individualized employment and training plan, and
- Progress monitoring in the form of monthly case notes

5.A.4. Support Services

CFET partners can provide two types of supportive services to participants: transportation and dependent care. The CFET partner must provide transportation related support services to help participants participate in the CFET program. These are direct payments for things like bus passes or other forms of public transportation. The participant must demonstrate a need for the specific service, and it must not be able to be fulfilled with other available program resources. As with other CFET expenses, the transportation expense must be reasonable and necessary.

Participants who demonstrate or attest to a dependent care need must be provided with a dependent care supportive service. As of October 2021, this payment is limited to $166 per participant.

CFET partners must keep a record when support service(s) were provided, date received, and amount paid. This must be tracked at a participant level and verification of the expense to the partner.

5.A.5. DONATIONS

CFET partners may receive donations to help operate their agency and their CFET program. Below are details how donations are treated:

- Donations from non-federal public agencies are allowable for reimbursement if the donated costs are not billed or claimed to another Federal program or used to match another Federal program.
- Donations may sometimes be in-kind, either from a private source or from a government agency. Goods and services that require a transfer of cash are not considered in-kind donations:
    - In-kind donations that are the value of volunteer time or other non-billable goods or services are not allowable if they are provided to or by a non-governmental agency or sub-grantee.
- Donations where a cash transfer is involved: Goods and services that require a cash reimbursement by the sub-grantee may be charged as a cost, providing the cash reimbursement is based on a legally enforceable contract or agreement between the grantee and sub-grantee.

5.A.6. PROPERTY PROCUREMENT AND MANAGEMENT

A CFET partner must notify PCG if they want to request reimbursement for equipment or property that is valued at more than $5,000 per item. Federal approval is required before a reimbursement is approved.

5.A.7. VALUATION OF PUBLICLY OWNED SPACE

CFET partners cannot charge private market rental rates for space that they own. CFET partners may only seek reimbursement on the costs of the space in one of two ways:

- A depreciation schedule
- An allowance with applicable charges for utilities, maintenance, and general upkeep.

5.B. REASONABLE AND NECESSARY

Expenditures must meet the test, as defined by FNS:[9]

Reasonable	Necessary
A cost is **reasonable** if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the costs.	A cost is **necessary** if it is needed in the performance of the program.
Reasonable costs: - Provide a program benefit generally commensurate with the costs incurred; - Are in proportion to other program costs for the function that the costs serve; and - Are within the scope of E&T.	Necessary costs: - Are incurred to carry out essential functions of E&T; - May not be avoided without adversely affecting program operations; - Are a priority expenditure relative to other demands on availability of administrative resources; and - Do not duplicate existing efforts.

5.C. INDIRECT COSTS

CFET partners can be reimbursed for indirect costs, if appropriate. Partners that have a verified, federally approved indirect rate can use that rate. Effective October 2021, California has capped the federally approved indirect rate at 25%.

Partners that do not have a verified, federally approved indirect rate can use the federal de-minimis rate (10%). The partner must provide a statement that outline what costs are included as indirect costs annually.

The indirect cost rate will only be applied to eligible personnel expenses.

5.D. RECOUPMENT

If SDWP determines a reimbursement was made in error (e.g., through a review of the partner records, monitoring, audit, or otherwise) the CFET partner shall refund and pay SDWP any compensations paid to the partner arising from such noncompliance.

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[9] Ibid.

If a federal or state audit indicates payments to the partner failed to comply with applicable federal or state laws, rules, or regulations, the CFET partner shall refund and pay SDWP any compensation paid to the partner arising from such noncompliance, plus costs, including audit costs.

5.E. BILLING AND INVOICES

Invoices will be submitted on either a monthly or quarterly basis. PCG will notify partners when invoices are due. Partners will use to the following process for invoicing PCG for reimbursements.

Invoice Submission Process Chart
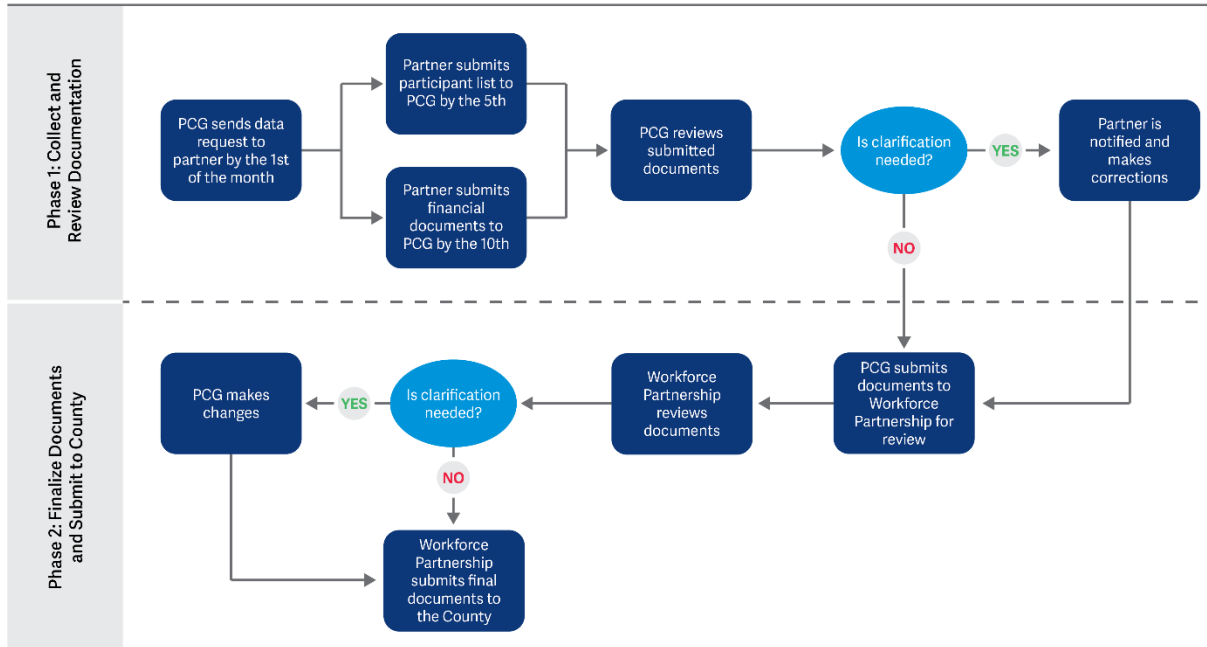
5.E.1. Invoice

Completed invoices must include the documents listed below. Additional information on the invoice process is shared as we enter into a partnership.

- Data Collection Tool
- Supportive Documentation Tool that organizes all supporting verification of expenditures
- General Ledger(s) for all cost centers that are used to fund the program
- Participant log

Invoices can either be emailed directly to the PCG representative or uploaded to the FTP.

5.E.1.a. CalFresh Enrollment at Invoice

A participant only needs to be enrolled for one day in CalFresh to be eligible for CFET for the entire month. Enrollment will be checked to confirm invoice accuracy. Enrollment will be assessed on a monthly basis. Participants can enter and exit the program at any time.

PCG will determine an eligibility calculation based off the number of participants that are enrolled in CalFresh out of the total number of participants. This calculation will be applied to all common expenditures, such as salary and rent. Any expenditures that are tied to a specific participant will be approved or denied based on that individual's enrollment. CalFresh enrollment verification flow…

Partner uploads Participant Log to FTP → **HHSA reviews and notes CalFresh enrollment dates** → **PCG notifies partner of participant enrollment** → **PCG determines eligibility calculation and individual-level expenses**

5.E.2. Reporting Expenses

The following are requirements for how and when costs or expenses must be reported:

- The invoice must be for actual costs incurred, not for estimated costs or for unobligated costs.
- Expenses should be reported in the month in which they were paid unless previously approved to be reported in the month in which they were incurred.
- Expenses must be charged to the appropriate federal fiscal year.
- An expense that is incurred in September 2019 (FFY19) and paid in October 2020 (FFY20) must be charged to FFY19. This is not considered an unobligated expense.

NEW PARTNER ONBOARDING CHECKLIST

SERVICE AGREEMENT

There are several required forms attached to the Service Agreement with SDWP. These include:

☐ **CFET Providers - Conflict of Interest statement**: This form will need to be completed and returned along with the Service Agreement

☐ **Attachment A - Description of Services:** This document will summarize the various programs and services that your agency is performing for CFET.

☐ **Certificate of Insurance:** All CFET providers must include additional insured parties for CFET. These include the City of San Diego, County of San Diego, and the SDWP.

Name	County of San Diego	City of San Diego	San Diego Workforce Partnership
Address	1255 Imperial Ave. Suite 446 San Diego, CA 962101	202 C Street San Diego, CA 92101	9246 Lightwave Ave, #210 San Diego, CA 92123

PROCESSES & DOCUMENTATION REQUIREMENTS

There are several small tweaks or changes that you will need to make to bring your current processes and documentation into line for CFET.

☐ **SNAP Enrollment Form:** You can only get reimbursed for a participant who has signed the SNAP enrollment agreement. I've attached two versions, a fillable PDF and a Word document. These can be electronically signed, physically signed, a picture of them taken in the case file, etc. We highly encourage you to embedded this is any new program participant paperwork and have all participants sign it. This will help increase your potential reimbursement.

☐ **Non-Discrimination Language:** The federal agency that oversees the CFET program requires a non-discrimination statement on any materials that were paid for by the federal agencies funding. This is generally on the website that agencies run and then in any new participant handbooks. The language is:

Funding provided by United States Department of Agricultural (USDA). USDA is an Equal Opportunity Provider, Employer, Lender.

☐ **And Justice for All poster:** CFET partners must have a copy(ies) of the "And Justice for All" poster in areas where CFET participants gather or meet.

☐ **Participant Plan:** Each CFET participant must have a Participant Plan that is regularly reviewed and updated. An example of a Participant Plan can be provided. Partners may use their own Participant Plan if it meets the minimum requirements outlined in section 4.A.

☐ **Indirect Costs:** If your agency has indirect costs, you will need to provide either:
   o Copy of your Federally Approved indirect cost rate
   o Statement outlining the types of costs incurred as indirect cost.