

KERN COUNTY DEPARTMENT OF HUMAN SERVICES
POLICY IMPLEMENTATION MEMORANDUM NO. 11-42

DATE: December 10, 2014
RE: Employment Services: Self-Initiated Programs (SIPs) for Participants in Employment Services

PURPOSE

This Memorandum provides policy and procedures for Self-Initiated Programs (SIPs) as a Welfare-to-Work activity (WTW) for participants in Employment Services. This policy was updated December 2014.

A training or education program in which the participant was enrolled prior to the Appraisal appointment is evaluated by the Employment Social Service Worker to determine if it meets the requirements for an approved SIP.

- ☒ If the participant's education or training program meets all the requirements to be approved as a SIP, it will become a part of the individual's WTW 2. See Section I.
- ☒ If the program does not meet all the requirements for a SIP, refer to Section VI to determine if the individual can continue in the unapproved training or education program until the end of the program's current quarter or semester.

I. REQUIREMENTS FOR SELF-INITIATED PROGRAMS TO BE APPROVED

A SIP must be approved if **all** of the following criteria apply:

A. "Date of Appraisal" Requirement

1. Original Appraisal:

The individual was enrolled in and/or attending the education or training program on the date of the original appraisal. (The original appraisal date will be used if the individual fails to attend the appraisal appointment without a good cause reason.)

2. Re-Referred to Employment Services After a Break-in-Aid

When an individual is discontinued from aid for more than 12 months and then re-referred to the Employment Services program, his or her education or training program is evaluated to determine if it meets the requirements for a Self-Initiated Program. However, if the individual was off of aid due to a sanction, he or she cannot be evaluated for SIP eligibility.

3. Definition of "Enrolled":

“Enrolled” means that the individual has applied for and has been accepted into a degree or certificate program, and continues to meet or fulfill all conditions imposed by the institution offering the program to maintain current enrollment status. If there are no formal acceptance procedures for the program, then enrollment status includes the declaration of a major. If the individual is completing general education, he or she must declare a major prior to the next education break in an approvable program.

NOTE: Students, who are not in an approvable program at the time of appraisal, including a student who has not declared a major, may continue until the next education break, switch to an approvable program, and qualify as a SIP participant.

B. The program leads to an undergraduate degree, certificate, or license.

- ▶ An individual with a baccalaureate (four-year) degree is not eligible to participate in a SIP program.

Exception: An individual with a degree can be approved as a SIP to earn a California regular classroom teaching credential in a college or university with an approved teacher credential preparation program.

- ▶ A program offered by a private postsecondary training provider will not be approved unless it is: 1) approved or exempted by the Department of Consumer Affairs - Bureau for Private Postsecondary Education, or 2) accredited by the Western Association of Schools and Colleges.

C. Completion of the program will likely lead to self-supporting employment for the individual.

- ▶ The program is on the county’s “Approved Self-Initiated Programs List”.

If the program is not on the “Approved Self-Initiated Programs List”, the individual is given the opportunity to show that the education or training program will lead to self-supporting employment. .

- ▶ Participation in a SIP cannot be denied on the basis that the individual already has skills which would allow him or her to obtain a job.

D. Satisfactory Progress

If the participant has started the program, he/she must be making satisfactory progress. See Section V.

Note: Program length is not part of the SIP approval criteria.

II. PARTICIPATION REQUIREMENTS FOR SIPS

A. Number of Hours of Participation

- ▶ The average monthly participation requirement for a participant in an approved SIP is 87 or 130 hours per month.
- ▶ Each SIP participant is required to independently meet the 87 or 130 hour per month on average SIP requirement.
- ▶ Concurrent Activities: The individual must participate in concurrent activities if the approved hours for the SIP are less than the required 87 or 130 hours per month on average.

B. Core and Non-Core Activities

- ▶ The requirement to participate at least 87 hours per month on average in core activities does not apply to individuals in approved SIPs. There is no core/non-core requirement for SIPs.
- ▶ Participants are able to meet CalWORKs federal standards through vocational education or concurrent activities such as unsubsidized employment or work study.

C. SIPs and the WTW 24-Month Time Clock

- ▶ Individuals in SIPs are WTW participants and subject to the WTW 24-Month Time Clock. However, as stated above, individuals in SIPs are able to meet CalWORKs federal standards. In those situations, months would not count toward the WTW 24-Month Time Clock.

D. SIPs and Summer/Other Breaks

- ▶ If the program that the client is participating in does not require or offer classes during the summer or other scheduled breaks, the client would not be required to enroll in additional classes during those breaks. However, the client would still be required to participate 87 or 130 hours per month on average, as applicable, in WTW activities. Client would then resume SIP program after the break.

E. SIP Participation for Two-Parent Households

The 30 hours per week on average SIP requirement applies to a two-parent household as follows:

Parent 1 = SIP Parent 2 = SIP	
<u>Parent 1</u> • 130 hours per month on average SIP requirement • No core/non-core requirement for the SIP.	<u>Parent 2</u> • 130 hours per month on average SIP requirement. • No core/non-core requirement for the SIP

Parent 1 = SIP Parent 2 = Mandatory participant that is not a SIP or Exempt (volunteer) – Agrees to participate for 22 hours per month on average to meet the 152 hour per month on average requirement.	
<u>Parent 1</u> 130 hours per month on average SIP requirement - No core/non-core requirement for the SIP.	<u>Parent 2</u> - Assigned to other WTW activities for 22 hours per month on average. - If the SIP activity for Parent 1 cannot be counted as a core activity, the additional 22 hours per month on average from Parent 2 must be in a core activity.
Parent 1 = SIP + 22 hours per month on average to meet 152 hour per month on average requirement. Parent 2 = Does not want to participate, is Exempt (non-volunteer) or Timed Out	
<u>Parent 1</u> 130 hours per month on average SIP requirement - No core/non-core requirement for the SIP. - Parent 1 must also participate 22 additional hours per month on average to meet the 152 hour requirement. - If SIP activity cannot be counted as a core activity, the additional 22 hours must be a core activity.	<u>Parent 2</u> No participation hours required.
Parent 1 = SIP Parent 2 = Not included in the Assistance Unit (household is considered a single parent AU).	
<u>Parent 1</u> 87 or 130 hours per month on average SIP requirement depending on age of children. - No core/non-core requirement for the SIP.	<u>Parent 2</u> No participation hours required.

F. SIPs and Exempt Volunteers

- ▶ In order for an exempt volunteer to qualify for a SIP, they must be participating in a qualifying education or training program prior to appraisal, as described in MPP Section 42-711.541. If the individual was not appraised prior to becoming exempt, then the individual may qualify for a SIP if he or she chooses to volunteer.
- ▶ Exempt volunteers participating in SIPs are not required to participate 87 or 130 hours per week on average per month. In addition, SIP participants that become exempt at a later date may return to participation as a SIP if they continued to meet all SIP criteria, or their program was interrupted, as described in ACL 13-01.

G. SIP Activity Hours That Are Counted

- ▶ The classroom hours for courses (including electives) that count toward the completion of the degree, certificate, or license must be allowed as participation hours for the participant. These hours include the general education requirements that are not in the individual's major or the area of concentration.
- ▶ The hours spent in an on-the-job training, internship or externship activity related to the SIP program are allowed.
- ▶ The hours spent studying can only be counted if the client receives academic credit as one of the activities listed in MPP section 42-716.31(a) through (j).

H. Additional SIP Information

- ▶ An assessment is not required to develop a WTW 2 for a participant in an approved SIP, but an assessment may be required if needed to assign concurrent activities.
- ▶ There are no requirements for denying a SIP based on the length of time it will take to complete the program.
- ▶ The SIP cannot be denied if the participant already has marketable skills.

III. PROCEDURES WHEN THE INDIVIDUAL REQUESTS APPROVAL OF A SELF-INITIATED PROGRAM

- A. Complete the "Consent to Release Information" - KCDHS 694.
- B. Complete the "Self-Initiated Program (SIP) Rights and Responsibilities" form.
- C. Complete the "Self-Initiated Program Evaluation" form with information provided by the participant.

The Employment SSW will require the participant to provide verification of the following:

- ✓ Type of program
- ✓ Beginning and ending dates of the program
- ✓ Satisfactory progress and attendance
- ✓ Class schedule and number of hours per week

- D. Determine if the program leads to self-supporting employment based on one of the following criteria:

- (1) The program is listed on the county's "Approved Self-Initiated Programs List".

OR

- (2) The individual is given the opportunity to show that the education or training program will lead to self-supporting employment. To assist the SSW in determining if the program will lead to self-supporting employment, he/she can provide one of the following:

- ✓ A signed statement from an employer stating the individual will be hired after completing the program.
- ✓ Labor market statistics or job placement rates that support that the training is in a high demand field that will lead to employment.

IV. SELF-INITIATED PROGRAM MEETS ALL CRITERIA FOR APPROVAL

Employment SSW Responsibilities:

- A. Complete an “Activity Contract” – WTW 2.
 - 1. The WTW 2 cannot be signed for a SIP until the individual provides verification that the program meets all the criteria listed in Sections I and II.
 - 2. Assign the participant to **appropriate concurrent work activities**, such as work study, part-time employment, etc., if needed to meet the weekly participation rate. An assessment is not required unless it is necessary to appropriately assign the individual to concurrent activities.
 - 3. The WTW 2 advises a participant that he/she must make satisfactory progress in the SIP or the SIP may be terminated and he/she will be required to participate in the regular WTW activity flow.
- B. Supportive Services: Use established county procedures to authorize any necessary supportive services, including transportation, child care, books, etc.
- C. Complete the “Student Financial Aid Statement” - WTW 8.
- D. Complete the Journal entry.

V. SATISFACTORY PROGRESS

Satisfactory progress is defined as earning at least a “C” in all attempted units on the report card or meeting the school’s regular assessment of periodic progress when the school uses an alternative grading system.

- A. Satisfactory progress for participation in a SIP is to be monitored on a monthly basis and evaluated at the end of each semester or quarter.

1. During each month of the semester or quarter, obtain verification of the client's participation in the SIP via a Monthly CalWORKs Activity Time Sheet (MCAT) or a school progress report.
 2. At the end of the each semester or quarter, an individual who is participating in a SIP must provide grades for the classes just completed.
 3. If the individual will continue participation in the SIP, the individual is required to provide a class schedule for the upcoming semester or quarter.
- B. Only grades contained on the most current report card submitted will be used for grade point average determination. Cumulative grade point averages will not be used.

C. **Grade of "D" on the Report Card**

If the individual receives a "D" on the current report card, and has a serious and compelling reason for not meeting requirements, the individual will be placed on academic probation for the next semester or quarter.

Academic Probation: If the individual is placed on academic probation, then the following will be required:

1. Participant must provide documentation from the educational institution to the Employment SSW clearly stating the reason for receiving the current unsatisfactory grade.
2. Employment SSW will consult with the Social Service Supervisor to determine if the participant will be allowed to continue with the current educational plan.
3. If the participant is allowed to continue with the next semester or quarter, the Employment SSW will request progress reports from the participant on a monthly basis. Failure to provide monthly progress reports will be considered as not making satisfactory progress.
4. At the completion of the probation period (current semester or quarter), the Employment SSW will review the participant's current report card and participation hours. If he/she received a "D" in any attempted units, he/she will be considered as not making satisfactory progress and the SIP status will be terminated.

D. **GRADE OF "I" FOR INCOMPLETE, "W" FOR WITHDRAWAL OR "F" FOR FAIL ON THE REPORT CARD**

If the individual received an "I" for Incomplete, "W" for Withdrawal or "F" for Fail, they will be considered as not making satisfactory progress.

1. This will result in academic probation (as described in “C” above) or termination of the SIP status.
 2. In making a determination, the Employment SSW will consider the following factors and discuss the situation with the Social Service Supervisor.
 - Does the participant have a serious and compelling reason for not meeting requirements?
 - What is the pattern of attendance for the past semesters or quarters?
 - Has the participant made satisfactory progress in prior classes?
- E. Classes that are repeated will not count toward participation hours.

VI. SELF-INITIATED PROGRAM DOES NOT MEET ALL CRITERIA FOR APPROVAL

A. Instructions when:

The individual's program meets **only** the requirements of:

- Enrolled at appraisal, **and**
- Satisfactory progress in the program:

It has been determined that the program will not: (1) lead to an undergraduate degree, certificate, license, or California regular teaching credential **and/or** (2) lead to self-supporting employment.

1. If the program **will be completed** at the end of the current semester/quarter:
 - The individual can complete the education or training program as an approved Welfare-to-Work activity and supportive services are available.
 - Send Notice of Action for Denial of Self-Initiated Program.
2. If the program **will not be completed** when the quarter or semester ends:
 - The individual is allowed to continue in the program until the end of the current semester/quarter.
 - Send Notice of Action for Denial of Self-Initiated Program.
 - The individual can transfer to a program at the end of the current quarter or semester that meets the SIP criteria.

B. Instructions when:

The individual was not enrolled in the program at the time of the appraisal appointment **and** the individual is:

1. Making satisfactory progress in the program.
 - Send Notice of Action for Denial of Self-Initiated Program.
 - If the Employment SSW determines that the hours of participation in the individual's current training program could be considered an appropriate post-assessment WTW activity, the individual participates in the regular Welfare-to-Work activity flow.
2. Not making satisfactory progress in the program.
 - The program will not be approved as a WTW activity.
 - Send Notice of Action for Denial of Self-Initiated Program.
 - The Employment SSW uses established procedures to refer and assign the individual to participate in the regular WTW activity flow.

VII. INTERRUPTION OF PREVIOUSLY APPROVED SELF-INITIATED PROGRAM

If an individual was previously approved to participate in a SIP and it was interrupted for reasons that meet the good cause criteria, the participant may resume participation in the same program if the following requirements are met:

- ✓ Satisfactory progress must have been maintained during prior participation.
- ✓ The SIP continues to meet the approval criteria.

Conditions that may be considered good cause include, but are not limited to, the lack of transportation, unavailability of child care, or domestic abuse issues. (See 42-713.) Good cause also includes reasons that are related to employment, an offer of employment, an activity, or other training for employment which are listed in 42-721.3. The good cause determination must be documented in the Journal and reviewed on a monthly basis.

VIII. PARTICIPANT WANTS TO CHANGE SIP PROGRAMS

When participating in a SIP, the individual is approved to participate in a specific training or education program. The individual cannot not change his/her SIP program unless there is a compelling reason as determined by the Employment SSW in consultation with the Social Service Supervisor. A change in a SIP program will only be permitted if the program is within the same field of study.