

**STATE OF FLORIDA**

**FOOD STAMP**

**EMPLOYMENT AND TRAINING PROGRAM**

**STATE PLAN**

**FEDERAL FISCAL YEAR 2008**

**Submitted By:**

**The Agency for Workforce Innovation**

## PART I

### SUMMARY OF FLORIDA'S FOOD STAMP EMPLOYMENT AND TRAINING PROGRAM

#### A. Abstract of Florida's Food Stamp Employment and Training Program.

Florida's Food Stamp Employment and Training (FSET) Program is designed to provide food stamp recipients who are able-bodied adults without dependents (ABAWDs) with the training, education, support services, and skills needed to become self-sufficient through employment.

Chapters 414 and 445, Florida Statutes, provide the authority for the Department of Children and Families (DCF) to refer FSET Program participants to the Agency for Workforce Innovation (AWI) to receive FSET Program services. To comply with 7 CFR 273.7 (c) (5), all FSET Program activities are administered by the AWI through the statewide workforce development system operated by Regional Workforce Boards (RWBs) through the One-Stop Career system. Components are delivered through a network of contracted public and private providers which allows FSET Program participants to receive uniform services in obtaining employment.

Work registration and referral to the AWI for participation in the FSET Program is determined by the DCF. The identification and referral of work registrants from the DCF to the AWI is achieved through a daily, automated interface between the DCF Florida On-Line Recipient Integrated Data Access (FLORIDA) system and the AWI management information system.

#### 1. PROGRAM CHANGES:

Florida is not making any programmatic changes in its FSET Program for FFY 2008.

- a. The FSET Program will continue to serve all vulnerable (time-limited) ABAWDs in the state to the extent possible due to funding, unless they are living in an area that is waived or where 15 percent exemptions are afforded to ABAWDs.
- b. The components offered in the FSET Program for Fiscal Year 2008 will continue to be Work Experience, Self-Initiated Work Experience, and Training and Education.

Florida is changing its Food Stamp Reimbursement (FSR) process as approved by the representatives of the United States Department of Agriculture (USDA) on August 1, 2007. Please see pages 24-26 for more information on the new process.

#### Automation Changes:

In an effort to assist FSET staff with implementing the program, certain clerical processes were automated by the AWI on February 1, 2008. The automated processes were developed to assist staff with eliminating certain clerical tasks associated with notifying participants of mandatory participation in the program, as well as eliminating certain clerical tasks associated with requesting sanctions for noncompliant participants. This allows FSET staff the opportunity to spend more time assisting program participants directly.

Phase 1 of the automation project reduces the amount of time and paperwork FSET staff must complete each time a "New Case," "Reopen," or "Transfer-To" alert is created through the One-Stop Service Tracking (OSST) system. Each night, the OSST system receives information about program participants and other cases through an "interface" with the FLORIDA system. If the information indicates that a new FSET case must be created, a case must be reopened and served in an FSET unit or a case must transfer to an area that is providing FSET services, the automated process initiates contact with the program participant. Effective February 1, 2008, the AWI began mailing an initial notification letter, the *Notification of Mandatory Participation*, to FSET participants whose cases are created, reopened or transferred to an area that is providing FSET services because of information from the FLORIDA system.

The FSET staff can stop the automated process if the participant responds and complies according to the instructions sent in the letter. The FSET staff should enter data on the case only if the participant attends the required activity or contacts program staff as indicated in the notice mailed to the customer.

If the participant does not comply as requested in the Notification of Mandatory Participation and program staff does not end the "Notification Letter" activity on the Skill Development screen, the OSST system will automatically initiate the conciliation process; and the AWI will mail a Notice of Failure to Comply and Possible Sanction.

If the participant does not respond and take the course of action required to terminate the conciliation process, the AWI will continue through the automated process by requesting a sanction. The automation process will request the sanction, confirm any closure/sanction alert generated through the interface and close the FSET case.

## 2.

### **ABAWD POPULATION:**

Nonexempt household members, as defined in CFR 273.7(a) and (b), are required to register for work and participate in the FSET Program. Priority attention is given to securing employment and work experience for ABAWDs. It is estimated that in FFY 2008, the AWI will work with approximately 11,250 ABAWD cases each month. Each case is tracked through an automated

computer system. The electronic case record will be annotated by the DCF to indicate each individual's ABAWD status using a code on the FLORIDA system.

The following 15 counties will offer FSET Programs:

Alachua	Hillsborough	Pinellas
Brevard	Lake	Polk
Broward	Orange	Putnam
Dade (Miami Dade)	Osceola	Seminole
Duval	Palm Beach	Volusia

Two full counties were waived under Waiver # 970134 as Labor Surplus Areas (LSAs). These counties are Glades and Hendry. No FSET services will be provided to ABAWDs in these counties, and they are not subject to time limits.

Florida will utilize its 15 percent exemption allowance to exempt ABAWDs residing in 44 non-waived counties where FSET services will not be provided. These counties are:

Baker	Flagler	Jefferson	Nassau
Bay	Franklin	Lafayette	Okeechobee
Bradford	Gadsden	Lee	Pasco
Calhoun	Gilchrist	Leon	Saint Johns
Charlotte	Gulf	Levy	Santa Rosa
Citrus	Hamilton	Liberty	Sarasota
Clay	Hardee	Madison	Sumter
Collier	Hernando	Manatee	Suwannee
Columbia	Highlands	Marion	Taylor
DeSoto	Indian River	Martin	Union
Dixie	Jackson	Monroe	Wakulla

Waiver # 970134 designates the City of Fort Pierce in Saint Lucie County as an LSA. Florida will use the 15 percent exemption allowance to waive the remaining ABAWD cases in Saint Lucie County.

The AWI will ensure that all non-waived ABAWDs and those not afforded a 15 percent exemption have the opportunity to fulfill the work requirements as identified in 7 CFR 273.24.

**3. ADDITIONAL ALLOCATION FOR “PLEDGE STATES” FOR FFY 2008:**

Florida is not applying for “pledge state” status.

#### 4. PROGRAM COMPONENTS:

The RWBs are responsible for delivery of the components of the state's FSET Program through their service provider contracts. Following is a list of the program components included in Florida's FSET Program:

- a. Work Experience Component
- b. Self-Initiated Work Experience Component
- c. Training and Education Component

Each workforce board will determine at the local level and will document in their local plan, the components that will be available in their area. The AWI will ensure that each region offers qualifying components to meet the needs of time-limited ABAWDs.

Orientation is a required activity for new or reopened referrals if the participant has not attended Orientation within the last 12 months. Orientation is required if there have been significant program changes since the participant last attended, regardless of the time frame. Assessment is required prior to placement into a component. Orientation and assessment are not stand-alone components; however, they are qualifying ABAWD activities and are considered part of the component to which the participant is initially assigned.

The FSET Program will focus on assisting ABAWDs in meeting their work participation requirements in order to ensure continued program access for compliant individuals. Per 7 CFR 273.24, ABAWDs will meet the work requirements by:

- ◆ Working 20 hours per week;\*
- ◆ Participating in and complying with the requirements of a work program 20 hours a week;
- ◆ Performing any combination of work and participation in a work program for a total of 20 hours per week; or
- ◆ Participating in and complying with a workfare program (i.e., Florida's Work Experience or Self-Initiated Work Experience components).

\*For purposes of this provision, 20 hours a week averaged monthly means 80 hours a month.

Working is not an FSET component. When an employed participant is referred to the FSET Program or if he or she gains employment while in the program, the job is recorded in the FSET management information system. An assessment is completed to identify the cause for part-time employment. If the working participant is unable to participate in additional FSET components, a deferral is requested of the DCF.

As a result of the assessment, if the participant is able to engage in FSET components, an appropriate referral is made (i.e., education/training, Work

Experience or Self-Initiated Work Experience). Such employed participants (regardless of the number of hours worked) are assigned to activities, as appropriate, for a certain number of hours. If an employed participant is assigned to Work Experience or Self-Initiated Work Experience, those hours assigned for Work Experience or Self-Initiated Work Experience shall not exceed the result of the benefit calculation and the total hours in employment and these components shall not exceed 120 hours per month. The calculation used to determine the required hours of participation is the household allotment of food stamps, divided by the state minimum wage, divided by the number of FSET participants in the household. If an employed participant is assigned to education/training, the total hours assigned in this component plus those in employment must be a minimum of 80 hours per month and shall not exceed 120 hours per month.

The FSET staff will obtain verification of component participation, as well as employment verification, to ensure that the participant is engaged in an appropriate number of hours in FSET components. This ongoing verification is not used to identify time-limited months.

#### **5. SEQUENCING OF COMPONENTS:**

Florida emphasizes a “work first” approach to the FSET Program. Upon entry into the program, the participant and the RWB service provider assess the individual’s strengths and employment goals. Based on the assessment results, the RWBs’ service providers have the flexibility to decide the sequence or flow of the individual’s activities. The Work Experience (WE) and Self-Initiated Work Experience (SIWE) components are the first components offered to FSET Program participants. Training and Education will be offered as needed.

#### **6. OTHER EMPLOYMENT PROGRAMS:**

Temporary Cash Assistance (TCA) is Florida’s Temporary Assistance to Needy Families (TANF) Program, which provides cash assistance to eligible families. While there is no direct sharing of activities between FSET and TCA programs, the RWBs provide services for both programs through the One-Stop Career system. Both programs are part of the same administrative structure and share resources, including the management information system.

**7. WORKFORCE DEVELOPMENT SYSTEM:**

All FSET Program activities are administered by the AWI through the RWBs/ One-Stop Career system. Components are delivered through a network of contracted public and private providers.

**8. OUTCOME DATA:**

Florida collects programmatic outcome data as required by the FNS 583 report, in addition to data included in performance measures for which outcomes are reported.

## B. PROGRAM COMPONENTS

### Component Summary

#### a. Name of Component: Work Experience

##### (1) Description of Component:

This is a work component in which ABAWDs perform work in a public service capacity as a condition of eligibility. In lieu of wages, work experience participants receive compensation in the form of their household's monthly food stamp allotment. The primary goal of work experience is to improve employability and encourage individuals to move into regular employment while returning something of value to the community. Work Experience assignments must provide the same benefits and working conditions provided to regular employees performing comparable work for comparable hours. The Work Experience Component consists of the three following activities:

- Upfront Job Search/Work Experience (WE) Self Initiated Work Experience (SIWE)
- Work Experience
- Work Experience combined with Job Search (JS)/Job Search Training (JST)

Work Experience sites are developed by the RWB service providers. Work site agreements and job descriptions are developed with community-based organizations. The calculation used to determine the required hours of Work Experience participation is the household allotment of food stamps, divided by the state minimum wage, divided by the number of FSET participants in the household. *Work Experience* will be used in the management information system to identify individuals assigned to this activity.

During the first 30 days after referral from the DCF, participants may be assigned to job search after orientation and assessment as long as the participant is being referred to WE/SIWE at the end of the 30-day period. *Upfront Job Search/WE-SIWE* will be used in the management information system to identify participants assigned to this activity. The participant will be assigned to WE or SIWE, and the management information system will be updated to reflect the new assignment when this activity ends. **NOTE:** The hours assigned to Upfront Job Search/WE-SIWE should not exceed the benefit calculation.

After the first 30 days, Job Search and Job Search Training can be included in this activity, but must comprise less than half of the required Work Experience hours for the month. *Work Experience combined with JS/JST* will be used in the management information system to identify individuals assigned to this activity.

- (2) **Type of Component:** A work component.
- (3) **Geographic areas covered:** Each workforce board will determine at the local level and will document in their local plan, whether this component will be made available in their area.
- (4) **Anticipated number of ABAWDs who will begin the activity:** 15,028.
- (5) **Anticipated number of non-ABAWDs who will enter the activity:** N/A.
- (6) **Anticipated number of volunteer participants who will enter the activity:** 0.
- (7) **Level of participant effort:** Each participant's required hours of participation will be determined by the calculation in (1) above.
- (8) **Organizational responsibilities:** The DCF refers all mandatory ABAWDs to the FSET Program. RWB service providers direct participants to the appropriate components. The FSET Program staff will track the hours of attendance, maintain documentation and report on participant activities.
- (9) **Estimated participant cost of reimbursement for transportation and other expenses except dependent care:** \$1,047,100 (Table 4).
- (10) **Estimated participant cost of reimbursement for dependent care:** \$0.
- (11) **Annual cost of the activity not including reimbursements:** \$7,039,231
- (12) **Cost of the activity per placement not including reimbursements:** \$468.
- (13) **Total cost of activity:** \$8,086,331 (Table 4).

**b. Name of Component: Self-Initiated Work Experience.**

**(1) Description of Component:**

This is a work activity, comparable to regular Work Experience, designed to assist ABAWDs in fulfilling their work requirement. In self-initiated programs, ABAWDs find their own work experience job assignments. The FSET Program staff has the option to allow participants to find their own community work experience position; however, this option is used only if an appropriate work site assignment cannot be located for the participant from existing work sites. The required number of hours in this activity mirrors the calculation for Work Experience. The Self-Initiated Work Experience Component consists of the three following activities:

- Upfront Job Search/WE-SIWE
- Self-Initiated Work Experience
- Self-Initiated Work Experience combined with JS/JST

The RWB service providers are responsible for developing work site agreements and job descriptions with the community-based organizations once the participant obtains a work site. The calculation used to determine the required hours of Self-Initiated Work Experience participation is the household allotment of food stamps, divided by the state minimum wage, divided by the number of FSET participants in the household. *Self-Initiated Work Experience* will be used in the management information system to identify individuals assigned to this activity.

- (2) During the first 30 days after referral from the DCF, participants may be assigned to job search after orientation and assessment as long as the participant is being referred to WE/SIWE at the end of the 30-day period. *Upfront Job Search/WE-SIWE* will be used in the management information system to identify participants assigned to this activity. The participant will be assigned to WE or SIWE, and the management information system will be updated to reflect the new assignment when this activity ends. **NOTE:** The hours assigned to Upfront Job Search/WE-SIWE should not exceed the benefit calculation.

After the first 30 days, Job Search and Job Search Training can be included in this activity, but must comprise less than half of the required Self-Initiated Work Experience hours for the month. *Self-Initiated Work Experience combined with JS/JST* will be used in the management information system to identify individuals assigned to this activity.

- (3) **Type of Component:** A work component.
- (3) **Geographic Areas Covered:** Each workforce board will determine at the local level and will document in their local plan, whether this component will be made available in their area.
- (4) **Anticipated number of mandatory participants who will begin the component:** 3,378.
- (5) **Anticipated number of Non-ABAWDs who will begin the activity:** N/A.
- (6) **Anticipated number of volunteer participants who will enter the component:** 0.
- (7) **Level of participant effort:** Each participant's required hours of participation will be determined by the calculation in (1) above.
- (8) **Organizational responsibilities:** The DCF refers all mandatory ABAWDs to the FSET Program. RWB service providers direct participants to the appropriate components. FSET Program staff will track the hours of attendance, maintain documentation and report on participant activities.
- (9) **Estimated participant cost of reimbursement for transportation and other expenses except dependent care:** \$123,800 (Table 4).
- (10) **Estimated participant cost of reimbursement for dependent care:** \$0.
- (11) **Annual cost of the activity not including reimbursements:** \$832,257
- (12) **Cost of the activity per placement not including reimbursements:** \$246.
- (13) **Total cost of activity:** \$956,057 (Table 4).

**c. Name of Component: Education and Training.**

**(1) Description of Component:**

This component provides educational or training programs or activities to improve basic skills or otherwise improve employability. The individual must participate a total of 80 hours a month in order to meet ABAWD requirements. Educational expenses will not be paid for training that is normally available to the public at no cost, will not be in excess of what the general public pays, and will be necessary and reasonable.

Florida has opted to combine all education and training activities into this component. The activities in this component include:

- Education/training  
Allowable education and training programs may include, but are not limited to the following:
  - Adult Basic Education (ABE),
  - Remedial education,
  - High school completion or General Education Development (GED),
  - Post secondary education,
  - Vocational training,
  - English for Speakers of Other Languages (ESOL), and
- Education/training combined with JS/JST
- Workforce Investment Act (WIA) Program
- Trade Adjustment Assistance (TAA) Program

**NOTE:** If training is not currently available, the participant may be placed at a Work Experience site for the required number of hours based on the calculation referenced earlier.

(2) **Type of Component:** A non-work component

(3) **Geographic Areas Covered:** Each workforce board will determine at the local level and will document in their local plan, whether this component will be made available in their area.

(4) **Anticipated number of mandatory participants who will begin the activity:** 1,271.

(5) **Anticipated number of Non-ABAWDs who will begin the activity:** N/A

(6) **Anticipated number of volunteer participants who will enter the activity:** 0.

(7) **Level of participant effort:** The individual must participate for a minimum of 80 hours per month and a maximum of 120 hours per month based on the assessment results.

(8) **Organizational responsibilities:** The DCF refers all mandatory ABAWDs to the FSET Program. RWB service providers direct participants to the appropriate components. The FSET Program staff will refer participants to appropriate schools or colleges and will follow up to determine if the participant is enrolled. The school or college will assist the participant to obtain financial aid, arrange classroom training, and determine classroom training and curriculum. The FSET Program staff will track the hours of attendance, maintain documentation and report on participant activities.

- (9) **Estimated participant cost of reimbursement for transportation and other expenses except dependent care:** \$67,100 (Table 4).
- (10) **Estimated participant cost of reimbursement for dependent care:** \$0.
- (11) **Annual cost of the activity not including reimbursements:** \$451,083
- (12) **Cost of the activity per placement not including reimbursements:**  
\$355
- (13) **Total cost of activity:** \$518,183 (Table 4).

## PART II

### PROGRAM PARTICIPATION AND EXEMPTIONS

#### A. Work Participant Population

1. Number of Work Participants:

- a. The number of participants expected to be in Florida as of October 1, 2007 is 165,642
- b. The anticipated number of new participants to be added between November 1, 2007 and September 30, 2008 is 269,351
- c. The total number of participants anticipated in Florida between October 1, 2007 and September 30, 2008 is 434,993.

To estimate the number of participants expected to be in Florida between October 1, 2007 and September 30, 2008, the actual number of participants on the FLORIDA System between July 1, 2006 and June 30, 2007 was used as a projection.

2. Unduplicated Work Participant Count:

The estimated number of participants is based on an unduplicated count of individuals. See Part V paragraph B.

3. Characteristics of Work Participants

Historical component participation data is extracted from the AWI management information system to identify future activities and components.

#### B. Exemption Policy

The DCF staff will determine all exemptions. The participant or the RWB service providers may provide documentation as appropriate. The DCF will assist in obtaining documentation for the participant if necessary.

Determination of good cause for failure to participate will be solely the responsibility of the DCF, but may be partially or wholly based on information provided from the FSET program staff or other sources.

#### Exemption Criteria Justifications.

- a. Categorical Exemptions: None
- b. Individual/Personal Exemptions Applying to Work Registrants.  
Individual exemptions include, but are not limited to:

- ◆ Receives or has applied for unemployment compensation;
- ◆ A parent or other household member who is responsible for the care of a dependent child under 6;
- ◆ A person younger than 16 years of age; or a person 60 years of age or older (50 years for ABAWDs);
- ◆ A person subject to and complying with Temporary Cash Assistance work requirements;

- ◆ Physically or mentally unable to work;
- ◆ Responsible for an incapacitated individual;
- ◆ Student enrolled at least half time in any recognized school, training program, or institution of higher education;
- ◆ Drug and/or alcohol treatment program participant;
- ◆ Complying with Refugee Assistance Program work requirements;
- ◆ Working a minimum of 30 hours per week or receiving earnings equal to or greater than the federal minimum wage times 30 hours.

c. ABAWD Exceptions to Time Limits:

- ◆ A person under age 18 or a person 50 years of age or older;
- ◆ Determined to be medically certified as physically or mentally unfit for employment. An individual is medically certified as physically or mentally unfit for employment if he or she:
  - Is receiving temporary or permanent disability benefits issued by governmental or private sources;
  - Is obviously mentally or physically unfit for employment as determined by the DCF. Individuals are obviously unable to participate due to a physical or mental incapacity only if the physical or mental impairment(s) are of such severity that the individual is not only unable to do his/her previous work but cannot, considering education and work experience, engage in any other kind of substantial gainful work which exists in the national/state/local economy.
  - If the unfitness is not obvious, it must be verified with a written or verbal statement from a physician, physician's assistant, nurse, nurse practitioner, designated representative of the physician's office, a licensed or certified psychologist, a social worker, or other medical personnel indicating the individual is physically or mentally unfit for employment.
- ◆ Is a parent (natural, adoptive, or step) of a household member under age 18, even if the household member who is under 18 is not himself eligible for food stamps;
- ◆ Is residing in a household where a household member is under age 18, even if the household member who is under 18 is not himself eligible for food stamps;
- ◆ Is pregnant;
- ◆ Is responsible for the care of an incapacitated person;
- ◆ Is receiving unemployment compensation or has applied for, but is not yet receiving unemployment compensation, if that person is complying with work requirements that are part of the Federal-State unemployment compensation application process;
- ◆ Is a regular participant in a drug addiction or alcoholic treatment and rehabilitation program;

- ◆ Is an employed or self-employed person working a minimum of 30 hours weekly or earning weekly wages at least equal to the federal minimum wage multiplied by 30 hours; or
- ◆ Is a student enrolled at least half-time in any recognized school, training program, or institution of higher education.

Only the DCF will have the authority to grant individual exemptions. All individuals claiming exemptions during participation in the program will be referred back to the DCF by the RWB service providers for the exemption determination.

The individual's exemption status will be reviewed at each re-certification or upon receipt of information affecting this status.

**d. Individual/Personal Deferrals**

Individual/Personal deferrals include circumstances beyond the participant's control, such as, but not limited to:

- ◆ Lack of transportation;
- ◆ Illness;
- ◆ Illness of another household member requiring the presence of the participant;
- ◆ A household emergency;
- ◆ Lack of adequate child care for children who have reached age six but are under age 12;
- ◆ Pregnancy with illness that affects the individual's ability to participate.

**e. FSET Good Cause Reasons**

FSET participants may be excused from program participation by the RWB service provider for a period up to 90 days for the following good cause reasons:

- ◆ Household emergency;
- ◆ Medical incapacity (less than 90 days);
- ◆ Medical incapacity of a household member;
- ◆ Pregnancy;
- ◆ Lack of childcare;
- ◆ Lack of transportation; and
- ◆ Circumstances beyond the individual's control.

**C. Number of Participants Exempt from the Employment and Training Program:**

See Table 1 for FFY 2008, Estimated Participant Levels.

**D. Planned Employment and Training Program Participation:**

See Table 2, Estimated Employment and Training Placement Levels.

**E. ABAWD Information:**

See Table 1 for the estimated number of ABAWDs expected to be in the state during the fiscal year, the number of ABAWDs expected to be in waived areas of the state during the fiscal year, and the number ABAWDs included in the state agency's 15 percent ABAWD exemption allowance. See Table 2 for the estimated number of ABAWDs to be placed into Workfare (Work Experience, Self-Initiated Work Experience) and Education/Training activities.

## PART III

### PROGRAM COORDINATION

#### A. Program Coordination

##### 1. Narrative Coordination Statement.

The following functions are the responsibility of the DCF: all eligibility determination related functions (including intake and application, work registration, certification, re-certification, determination of good cause, and sanctioning resulting from noncompliance with FSET Program requirements). Supervision and implementation occurs at the DCF circuit/region level, according to policy and procedures developed and established by the ACCESS Florida Program Office at the DCF headquarters.

The AWI is responsible for state level oversight of the FSET program activities, including providing technical assistance, training and policy direction to AWI and RWB staff, program reporting, and monitoring compliance with component requirements. The two agencies will jointly participate in federal audits and reviews and coordinate any required corrective actions or responses to the audit/reviews.

The FSET Program Interagency Agreement is written by staff from the DCF and the AWI and contains language to ensure that collaboration occurs in the operation of the FSET Program.

The AWI has established FSET Program performance indicators to ensure program quality and effectiveness.

##### 2. Information Coordination.

The FSET staff at the local and state level meet with staff of the DCF on a regular basis to share information and coordinate program procedures. Federal reports are prepared jointly by staff from both agencies at the state level.

Additionally, information exchange relating to eligibility occurs between the AWI, RWB/Service Provider staff and the DCF in accordance with procedures described in the FSET Program Interagency Agreement. The AWI and the DCF management information systems have a long history of sharing information for the FSET and other programs. The FSET mandatory registrants are referred electronically to the AWI through an interface. When participants are engaged in activities by the FSET Program, information continues to be transmitted through the interface, including information about employment and noncompliance. Based on information received through the electronic interface, the DCF staff takes appropriate action for each case.

The conciliation, good cause, and sanctioning procedures are described below.

Mandatory FSET Program registrants who fail or refuse to comply with program requirements are subject to sanctioning.

**Failure to Participate:** Failure or refusal to comply occurs when an individual states verbally or in writing that he/she will not comply, or when the mandatory registrant's inaction indicates failure or refusal to comply with FSET program requirements.

**Conciliation:** The conciliation process allows the FSET career manager and the registrant an opportunity to discuss reasons for the failure to comply, determine if good cause for noncompliance exists, and resolve disputes involving participation in program activities.

The conciliation process begins when a registrant fails to comply with program requirements or when the FSET career manager learns of the failure. During the conciliation period, the individual is afforded ten calendar days to contact the program staff. If the registrant refuses to comply prior to the end of the ten calendar days, the conciliation period ends and a sanction is requested. If the registrant complies or provides good cause prior to the end of the ten calendar-day period, the conciliation process ends and program participation resumes. If there is a subsequent failure, the conciliation process begins again.

**Document Efforts:** The FSET career manager must document efforts to contact the participant in the AWI management information system.

**Good Cause:** "Good cause" is defined as circumstances beyond a registrant's control that prevent participation in assigned FSET activities. When a registrant is unable to participate, fails to participate, or refuses to comply with FSET requirements, the FSET career manager must make a preliminary effort to determine if good cause exists prior to notifying the DCF of the registrant's failure to comply with FSET Program requirements.

The examples of good cause addressed in section II, part B (e) will be communicated verbally and in writing to participants by FSET staff during Orientation. When it has been determined that good cause no longer exists, the registrant must be required to begin participation in appropriate FSET activities. Any documentation that supports the determination of good cause must be retained in the case file.

**Sanctions:** Upon determining noncompliance without good cause, a sanction is requested by the FSET program staff. A sanction request may result in the reduction or termination of food stamp benefits. The sanction process is described below.

**A. FSET Sanction Request:** Upon determining noncompliance (i.e., failure to respond to the notice of failure to participate, or refusal to comply) the

Upon receiving notification of the participant's failure to comply with FSET requirements, the DCF will initiate sanction procedures. If good cause can be established, the sanction will not be imposed by the DCF, and the participant should be re-assigned to FSET activities.

- B. Notice of Adverse Action and Sanction:** If good cause is not established and the mandatory individual is not willing to participate in FSET activities, the DCF will send a Notice of Adverse Action and Sanction, notifying the individual that the failure to comply with FSET requirements without good cause will result in sanctions being applied to the food stamp allotment.

**DCF Responsibility:** The DCF is required to take action to reduce the food stamp allotment beginning with the first full month following the ten-day Notice of Adverse Action and Sanction.

**FSET Career Manager Responsibility:** It is the FSET career manager's responsibility to make every attempt to:

- a. Provide an opportunity for conciliation to each participant when a failure has occurred;
- b. Follow correct and timely sanction procedures;
- c. Enter sanction information in the AWI management information system. The DCF will be notified by an overnight data exchange through the AWI management information system to the FLORIDA System.

**Removal of Sanction:** If the food stamp benefits are terminated, the minimum penalty period must be served. When the minimum penalty period has been served, a participant may demonstrate compliance to have the sanction removed. If the individual contacts FSET staff in person, by telephone, or in writing, indicating a desire to participate in a program activity, the registrant will be immediately scheduled in an activity. The FSET program staff should notify the DCF when the individual has demonstrated compliance by ending the sanction request with "complied" on the AWI management information system and other notification based on local operating procedures. The sanction request record in the AWI management information system should be ended retroactive to the date the participant agreed to comply only after the participant has begun to demonstrate compliance, as long as this date is not during the minimum penalty period.

**NOTE:** If good cause is determined at any step in the sanctioning process, the sanction is to be removed. The individual must be given another opportunity to comply with the FSET requirement. The sanction process that was initiated, but subsequently ended due to good cause, is not considered a sanction.

**Right to a Fair Hearing:** A participant has a right to a fair hearing to resolve any complaint or disagreement about participation in the FSET Program.

### **3. Coordination Time Frames.**

Referrals to the FSET Program are processed nightly between the automated management information systems of the two agencies. Participants are referred by the DCF upon determining their mandatory status. As indicated in the previous section, notification of noncompliance is transmitted to the DCF at the end of the conciliation period, if appropriate.

## **B. Interagency Coordination**

See Table 3 for details of Interagency Coordination. Coordination will occur at the RWB local level and at the state agency level.

## **C. Contractual Arrangements**

The AWI does not provide any direct employment and training services. All E&T services, as well as other workforce programs, are delivered through the RWBs via contracts with various entities for the delivery of direct services to customers and program participants.

**Program monitoring:** The RWBs are responsible for performing compliance monitoring at the local level. State level program compliance monitoring of the FSET program is conducted annually for each service delivery area. The monitoring review consists of reviewing the methods for notification of program obligations, assignment to program activities and documentation of completion of program activities, issuance of the Food Stamp Reimbursements, and timely sanction requests.

The monitoring reports provide an assessment of the local RWB and individual service providers' compliance with the FSET program requirements. In the event the report includes significant negative findings, a Corrective Action Plan (CAP) is required of the RWB. Technical assistance is provided by the AWI to assist the RWB in its CAP process until all negative findings have been addressed to the satisfaction of the AWI. Copies of all state and regional monitoring reports, schedules, and corrective action plans are maintained at the AWI headquarters. A copy of the monitoring reports is provided to the DCF.

**Fiscal monitoring:** Monitoring is provided by a contracted CPA firm under a fixed price contract agreement for all funds passed through to the local RWBs, including FSET. The FSET grant funds its fair share of the cost of this contract.

This amount is determined by calculating the quarterly percentage of FSET RWB expenditures to the total RWB pass through expenditures. The portion of the fiscal monitoring contract funded by FSET is included in the "State Administrative Costs" section of table 4.

Annual visits are performed on site according to an established schedule using a monitoring tool developed by the AWI. The areas monitored include cost allocation plans, fiscal reporting, cash management, sub-recipient monitoring, and various compliance issues as required by federal OMB circulars and regulations.

Each RWB must submit a corrective action plan addressing each finding in the monitoring report. Corrective actions must be approved by the AWI fiscal oversight staff, and each action is reviewed at the next scheduled monitoring review. Copies of all reports are maintained at the AWI and are used to verify contract compliance and as part of subsequent monitoring reviews.

## PART IV

### PROGRAMS COST AND FINANCIAL MANAGEMENT INFORMATION

#### A. Planned Costs of the State Employment and Training Program

1. Operating Budget. See Table 4, Operating Budget.
2. Sources of Employment and Training funds. See Table 5, Planned Fiscal Year Costs of the State Employment and Training Program by Category of Funding.
3. Justification of Education Costs: In Florida, educational costs are met through other existing education programs when they are available. If funds are not available through other programs, FSET (100 percent) funds may be used to pay the educational institution directly for costs associated with participation in this component. Funds cannot be used to pay the participant directly for costs incurred.

#### B. Contracts - Interagency Agreement Arrangements

Financial agreements to provide FSET services will be let and managed strictly according to State of Florida regulations. Copies of the actual documents are available for inspection at the Department of Children and Families, 1317 Winewood Boulevard, Building 1, Tallahassee, FL 32399-0700.

1. Name and Location of the Provider

The Agency for Workforce Innovation  
Food Stamp Employment and Training Program  
Caldwell Building  
107 East Madison Street MSC-229  
Tallahassee, FL 32399-4133

2. Amount of the budget:

OWP Plan	\$956,053
FSET Plan	<u>\$9,560,571</u>
Total Budget	\$10,516,624
3. Financial Management Approach: Interagency Transfer.
4. Basis for Charging for Services: Total Program Costs.

#### C. Participant Reimbursement

##### Reimbursements: (Table 4)

Work Experience:	\$1,047,100
Self-Initiated Work Exp.:	<u>\$ 123,800</u>
Education/Training:	<u>\$ 67,100</u>
Total:	<u>\$1,238,000</u>

Dependent Care Reimbursements

Work Experience:	\$ <u>0</u>
Self-Initiated Work Exp.:	\$ <u>0</u>
Education/Training:	\$ <u>0</u>
Total:	\$ <u>0</u>

General revenue funds are available to use for the state's 50 percent matching funds. Participant expenses for transportation and costs other than dependent care, per participant per month, are reimbursed by AWI 50 percent federal cost sharing up to the actual cost of the participant expenses or the state agency maximum reimbursement rate, whichever is lowest.

**NOTE:** If funds are available, 50/50 funds will be used to allow RWBs to hire temporary staff and/or to provide additional participant reimbursements to participants related to component participation. For example, if funds allow, participant expenses for transportation and costs other than dependent care will be reimbursed by the AWI using 50 percent federal cost sharing up to the actual cost of the participant expenses or the state agency maximum reimbursement rate as established by the state agency, whichever is lowest. These payments may be provided as reimbursement for expenses or in advance as payment for anticipated expenses in the coming month.

Other reimbursements up to the established maximum reimbursement amount per month, per participant, will be processed and paid at the local level from funds passed through to the RWB for this purpose. Required documentation includes case notes (needed for reimbursement) and time/attendance sheets or other documentation for eligibility for reimbursed costs. Other information in the case file may include job search forms, receipts or other appropriate documentation of the expense or reason for advance payment for the coming month's anticipated expense, type of reimbursed costs and amount of the reimbursement.

Funds passed through to the RWBs will be used to pay for fingerprinting, drug tests and background checks when needed for FSET program participants who are engaged in the components described in Part I.

**1. Method of Reimbursement**

**New Policy Effective October 1, 2007**

**Reimbursement for Orientation and Assessment**

Effective September 20, 2007, participants will receive Food Stamp Reimbursements on their electronic benefit transfer (EBT) card. In addition to the changes in the FSR medium, effective October 1, 2007, the reimbursement amounts afforded to the participants will change. In efforts to align the FSET program with federal requirements, participants should be afforded

reimbursements for any level of participation for incurred legitimate expenses related to component participation, even if the participant did not complete the assigned activity.

Participants who complete Orientation or Initial Assessment (in lieu of Orientation) earn an FSR of \$25. Staff **must** request the FSR for those individuals who attend Orientation/Assessment, including those individuals who attend Orientation to have a sanction lifted, for the month in which the individual successfully completed Orientation/Assessment. It is our intent for this initial \$25 to act as a reimbursement for expenses incurred in order to attend the activity and as an advance for anticipated expenses in the coming month. Any future FSRs earned will be reimbursement for expenses incurred as a result of component participation.

### **Reimbursement for Component Participation**

Participants who complete 1-50 percent of the assigned hours for WE/SIWE activities (see below) in the month shall be reimbursed \$12 for that month. Participants who complete more than 50 percent of the assigned hours for WE/SIWE activities in the month shall be reimbursed \$25 for that month. Those participants who otherwise would not be eligible to receive the maximum of \$25 due to their hours of participation will be eligible to receive up to the maximum amount if they provide actual documentation (receipts, etc.) showing that it cost them more than \$12 to participate in the activity. If the documented expenses (regardless of the hours of participation) exceed the maximum of \$25, program staff will place the participants in Good Cause status (Lack of Transportation FSET) for up to 90 days while they work with DCF staff (provide copies of the documentation they received) to give the participant a deferral from program participation. This deferral could defer the participant from program participation until the next certification period. **NOTE:** Currently, most participants are required to perform 20-23 hours of Work Experience-related activities each month. The number of required hours will decrease as the minimum wage increases.

- Upfront Job Search/WE-SIWE (576)
- Work Experience (509)
- Self-Initiated Work Experience (517)
- WE combined with JS/JST (577)
- SIWE combined with JS/JST (578)

Participants who complete 1-50 percent of the assigned hours for Education and Training activities (see below) in a month shall be reimbursed \$20 for that month. Participants who complete more than 50 percent of the assigned hours for Education and Training activities in a month shall be reimbursed \$40 for that month. Those participants who otherwise would not be eligible to receive the maximum of \$40 due to their hours of participation, will be eligible to receive up to the maximum amount if they provide actual documentation (receipts, etc.)

showing that it cost them more than \$20 to participate in the activity. If the documented expenses (regardless of the hours of participation) exceed the maximum of \$40, program staff will place the participants in Good Cause status (Lack of Transportation FSET) for up to 90 days while they work with DCF staff (provide copies of the documentation they received) to give the participant a deferral from program participation. This deferral could defer the participant from program participation until the next certification period. **NOTE:** Participants enrolled in Education and Training activities must be assigned to the activity for a minimum of 80 hours per month.

- Workforce Investment Act (579)
- Trade Adjustment Assistance (580)
- Education/training (581)
- Education training combined with JS/JST (582)

**NOTE:** Only one FSR can be earned in a month, even if more than one qualifying activity is open in that month.

Reimbursements will be authorized by the RWB Service Provider and may include transportation or other costs such as, but not limited to, automobile gas, taxi or bus fare, tools, clothing and resume writing or printing.

**NOTE:** Prior to being placed in a component, participants will receive written notification of the opportunity to claim actual expenses up to the maximum levels for each component with documentation proving the expense occurred.

## **2. Procedure for Reimbursement**

Florida reimburses participants for the expenses of transportation and component-related expenses. The transportation and component related reimbursement requests are entered directly into the automated information system by way of the Food Stamp Reimbursement (FSR) Screen. Required documentation includes case notes (needed for reimbursement) and time/attendance sheets to document eligibility for reimbursed costs.

### **D. Cost Allocation:**

**State level:** The AWI staff devoted full-time to Florida's FSET program are direct charged. Costs of the staff who work on other program activities are allocated based on methodologies in the state's cost allocation plan. Computer charges, expenses to support statewide quality assurance, training and technical assistance, monitoring, indirect costs, and FSET participant reimbursement for transportation are maintained at the state level. These costs are developed prior to the state fiscal year, and revenue from state appropriation and federal 50 percent match and 100 percent FSET funds are used to support these costs. Annual costs for the different categories of expenditures are as follows:

One-Stop Program Office Costs*	\$473,539
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Other AWI Administrative Costs*	\$ 89,589
Indirect	\$23,564
WFI Costs*	\$103,736
Computer Support Costs:	
OSMIS/Legacy and Geo Sol Job Bank	\$231,454
Contractual Services:	
Fiscal Monitoring Contract	\$7,031
FSET Participant Reimbursement, Transportation, and Other Costs	\$1,238,000

\*Salaries and benefits for state level staff are included here.

**Local level:** The FSET service delivery and participant case management costs are incurred at the local RWBs through contracts with workforce service providers. The amount of funds available to each RWB is a determined based on several variables.

1. The amount of funds provided by the USDA;
2. The amount of holdback necessary to support systems, WFI activities, job bank costs, program operations and state level administration;
  - (a) These costs are developed prior to the state fiscal year and agreed upon each year by the State Workforce Board. The remaining dollars are distributed to the RWBs operating FSET Programs.
3. Counties required to participate in FSET based on the FNS waiver response and 15 percent exemptions allowed; and
4. The number of annual ABAWDs by county. This will determine the workload in each FSET county.

The amount of funds available to RWBs statewide is allocated to each FSET county based on its share of the workload. All the funds allocated to each FSET county are then added together by the RWB to arrive at the RWB regional allocation. Each ABAWD statewide is considered equal for cost allocation purposes, and there are no geographic or other differentials applied. See Table 4, under the Privatization Contracts category for the planned allocation to the RWBs.

## PART V

### PROGRAM REPORTING AND MANAGEMENT INFORMATION

#### **A. Method for Obtaining Initial Count of Work Participants.**

The number of work participants on the first day of the fiscal year is based on data extracted from the Department of Children and Families' automated information system, the FLORIDA System. The system records the number of new participants each month and is programmed to have the capability to identify the number of food stamp recipients that are currently work registered in a given month.

#### **B. Method for Ensuring an Unduplicated Work Participant Count.**

The FLORIDA System counts work participants only at initial program registration. The work participants are tracked by their social security number. The management information system used by the AWI receives referrals directly from the FLORIDA System.

#### **C. Methods for Meeting Ongoing Federal Reporting Requirements.**

Florida has automated data collection information systems (DCF FLORIDA System and the AWI Management Information System) that provide information required on federal reports.

1. Management Information System (MIS) Method
  - a. Type of MIS Management information is provided by a combination of automated reports.
  - b. Local reporting requirements
    - 1) Will local agencies and service providers be required to submit regular reports?

No, local agencies and service providers do not submit regular reports, but data is entered in the MIS system as noted in 2) and 3) below.
    - 2) What information must local agencies and service providers report?

FSET providers are required to, at a minimum, record the following program and participant-related information in the AWI management information system.

      - Activities to which participants are assigned;
      - Participation in activities, including failure to participate;
      - Outcome of participation in activities;
      - Participant eligibility for the Food Stamp Reimbursement;
      - Participant entry into employment

- 3) How frequently must local agencies and service providers report?  
The FSET providers must record the aforementioned information in the MIS system as they occur and not later than the tenth day of each month for the previous month.

2. Organizational Responsibility for Employment and Training Reporting.
  - a. Responsibility for Nonfinancial Employment and Training Reporting in Cooperation with Agency for Workforce Innovation:

Department of Children and Families  
Office of ACCESS Florida  
Building 3, Room 412  
1317 Winewood Boulevard  
Tallahassee, FL 32399-0700

Agency for Workforce Innovation  
One-Stop and Program Support  
107 East Madison Street  
Caldwell Building  
Tallahassee, FL 32399-4134

- b. Responsibility for Financial Employment and Training Reporting in Cooperation with Agency for Workforce Innovation:

Department of Children and Families  
Office of Revenue Management  
Building 1  
1317 Winewood Boulevard  
Tallahassee, FL 32399-0700

Agency for Workforce Innovation  
One-Stop and Program Support  
107 East Madison Street  
Caldwell Building  
Tallahassee, FL 32399-4134

# TABLES

**TABLE 1**

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**Estimated Participant Levels  
Fiscal Year 2008**

<b>A.</b>	Anticipated number of work registrants in the state during the Fiscal Year.	<u>434,993</u>
<b>B.</b>	List planned exemption categories and the number of work registrants expected to be included in each during the fiscal year.	
	1. ABAWDs in LSA area	<u>6,664</u>
	2. All FSET Mandatory Non-ABAWDs	<u>323,043</u>
	<b>TOTAL EXEMPTIONS</b>	<u>329,707</u>
<b>C.</b>	Percent of all work registrants exempt from FSET (B/A)	<u>75.8%</u>
<b>D.</b>	Number of FSET mandatory participants (A-B)	<u>105,286</u>
<b>E.</b>	Anticipated number of ABAWDs in the state during the Fiscal Year.	<u>111,950</u>
<b>F.</b>	Anticipated number of ABAWDs in waived areas of the state during the fiscal year	<u>6,664</u>
<b>G.</b>	Anticipated number of ABAWDs to be exempted under the state's 15 percent ABAWD exemption allowance during the Fiscal Year	<u>58,455</u>
<b>H.</b>	Number of at-risk ABAWDs expected in the state during the Fiscal Year (E-(F+G))	<u>46,831</u>

**Table 2**

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**<sup>1.</sup> ESTIMATED E&T PLACEMENTS  
FISCAL YEAR 2008**

<b>1.</b>	Number of ABAWD applicants and recipients expected to participate in a qualifying ABAWD component each month.	<u>5,395</u>
<b>2.</b>	Number of all other applicants and recipients (including ABAWDs involved in non-qualifying activities) expected to participate in a component each month.	<u>248</u>
<b>3.</b>	Total number of applicants and recipients the state agency expects to participate in a component each month during the fiscal year.	<u>5,643</u>

**<sup>2.</sup> ESTIMATED INDIVIDUAL PARTICIPATION  
FISCAL YEAR 2008**

	Number of individuals expected to participate in the E&T Program during the fiscal year	<u>39,801</u>
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<sup>1.</sup> Estimate the numbers that will participate in components each month and total them on line 3. This information represents a duplicate count of participants over the course of the fiscal year and corresponds to lines 3 and 4 on the FNS-583, E&T Program Activity Report.

<sup>2.</sup> Estimate the unduplicated numbers of individuals who will participate during the fiscal year. This information corresponds to line 7 on the FNS-583.

**TABLE 3****Summary of Interagency Coordination for the FSET Program in Fiscal Year 2008**

<b>Areas of Coordination</b>	<b>Agencies (list all that are involved)</b>	<b>Number of Placements Expected</b>	<b>Methods of Coordination</b>
1. Delivers an FSET component	AWI; RWBs, RWB providers, educational institutions	39,801	Statewide Interagency Agreement
2. The FSET Program delivers a service for another agency or program	N/A	N/A	N/A
3. Joint component of the FSET Program and another agency or program	N/A	N/A	N/A
4. Referral of individuals from the FSET Program to another program or agency	Workforce Investment Act, Trade Adjustment Assistance	1,611	Local working agreements and operating procedures
5. Other forms of coordination	N/A	N/A	N/A

**TABLE 4  
OPERATING BUDGET FISCAL YEAR 2008**

Components	Program Support Services Costs (RWB Pass Through Budget)	Total for 100% Funds	State Agency Admin. and Direct Charged Staffing For FSET (50/50 funds)	Computer Support Costs (50/50 funds)	Participant Reimbursement Transportation and other Costs (50/50 funds)	Total for 50/50 Funds	Total of 100% Funds and 50/50 Funds
Work Experience (84.58%)	\$6,253,556	<b>\$6,253,556</b>	\$589,911	\$195,764	\$1,047,100	\$1,832,775	\$8,086,331
Self-Initiated Work Experience (10.00%)	\$ 739,366	<b>\$739,366</b>	\$69,746	\$23,145	\$123,800	\$216,691	\$956,057
Training (5.42%)	\$400,736	<b>\$400,736</b>	\$37,802	\$12,545	\$67,100	\$117,447	\$518,183
<b>Total</b>	<b>\$7,393,658</b>	<b>\$7,393,658</b>	<b>\$697,459</b>	<b>\$231,454</b>	<b>\$1,238,000</b>	<b>\$2,166,913</b>	<b>\$9,560,571</b>
						<b>Total Component Costs</b>	<b>\$9,560,571</b>
						<b>Total State FSET Costs</b>	<b>\$9,560,571</b>

**AWI:**

FSET 100% Grant Funds	\$7,393,658
Pledge State Funds	\$ -
General Revenue	\$1,083,457
Federal Match to GR	<u>\$1,083,456</u>
<b>AWI Subtotal</b>	<b>\$9,560,571</b>

**AWI Costs:**

Contractual Costs	\$ 7,031
Participant Reimbursement Costs	\$ 1,238,000
State Agency & Privatization Costs	<u>\$ 8,315,540</u>
	<b>\$9,560,571</b>

**DCF:**

General Revenue	\$ -
Federal Match to GR	<u>\$ -</u>
<b>DCF Subtotal</b>	<b>\$ -</b>
<b>Total State E&amp;T Costs</b>	<b>\$9,560,571</b>

**TABLE 5**

**PLANNED FISCAL YEAR COSTS OF THE STATE FSET PROGRAM BY CATEGORY OF FUNDING— FISCAL YEAR 2008**

Funding Category	Approved FY 2007 Budget *	Fiscal Year 2008
<b>1. 100 Percent Federal FSET Grant:</b>	\$6,793,928	\$7,393,658
<b>2. Share of \$20 Million ABAWD Grant (if applicable)</b>	\$0	\$0
<b>3. Additional FSET Administrative Expenditures</b>		
<b>50% Federal</b>	\$680,420	\$464,456
<b>50% State</b>	\$680,421	\$464,457
<b>4. Participant Expenses:</b>		
<b>a. Transportation/Other</b>		
<b>50% Federal</b>	\$341,337	\$619,000
<b>50% State</b>	\$341,338	\$619,000
<b>b. Dependent Care</b>		
<b>50% Federal</b>	\$0	\$0
<b>50% State</b>	\$0	\$0
<b>5. Total FSET Program Costs (1+2+3a+3b+4a+4b = 5)</b>	\$8,837,444	\$9,560,571
<b>6. 100% State Agency Cost for Dependent Care Services</b>	\$0	\$0
<b>7. Total Planned Fiscal Year Costs (Must agree with Table 4—Operating Budget)</b>		<b>\$9,560,571</b>

\*Include immediately preceding fiscal year's approved budget figures for each spending category

TABLE 6

FSET PROGRAM FLOW CHART

