

STATE OF FLORIDA

FOOD STAMP

EMPLOYMENT AND TRAINING PROGRAM

PLAN OF OPERATIONS

FOR THE

OPTIONAL WORKFARE PROGRAM

FEDERAL FISCAL YEAR (FFY) 2008

Submitted By:

The Agency for Workforce Innovation

SUMMARY OF FLORIDA'S FOOD STAMP OPTIONAL WORKFARE PROGRAM

A. Abstract of Florida's Food Stamp Optional Workfare Program (OWP)

The Food Stamp Optional Workfare Program is a program in which food stamp recipients perform work in a public service capacity as a condition of eligibility. In lieu of wages, workfare participants receive compensation in the form of their household's monthly food stamp allotment. The funding for the three workfare contracts is 50/50 state/federal match funds. The 100 percent federal grant funds are only used to operate Florida's Food Stamp Employment and Training Program and therefore are not used to fund the Optional Workfare Programs.

The Florida Department of Children and Families (DCF) is the single state agency for the Food Stamp Program. The DCF and the Florida Agency for Workforce Innovation (AWI) have a written Interagency Agreement for the AWI to operate the OWP. The OWP is operated by written contracts between the AWI and the Board of County Commissioners in the three separate counties as follows:

1. Optional Workfare Counties

- a. Escambia County: The Escambia County Board of County Commissioners is the operating agency for the Escambia County Optional Workfare Program. The Optional Workfare Program has been in continuous operation since 1985.
- b. Walton County: The Walton County Board of County Commissioners subcontracts the Walton County Optional Workfare Program to the Okaloosa/Walton College, which is the operating agency for the program. The Optional Workfare Program has been in continuous operation since April 1, 1995.
- c. Holmes and Washington Counties are part of the Walton County Optional Workfare Program. The Walton County Board of County Commissioners has formed a consortium with the Holmes County Board of County Commissioners and the Washington County Board of County Commissioners to provide workfare services to Holmes and Washington Counties as part of the Walton County Optional Workfare Program.
- d. Okaloosa County: The Okaloosa County Board of County Commissioners subcontracts the Okaloosa County Optional

Workfare Program to Workforce Connection Inc., which is the operating agency for the program. The Optional Workfare Program began on January 1, 1998.

2. Program Changes

Change 1: 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) may earn an FSR of \$25. Staff must request this 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.

Participants who complete 1-50 percent of the assigned hours for WE/SIWE activities in the month shall be reimbursed \$12 for that month, and 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. Educational training does not qualify for an FSR during the month unless the Work Experience related activities are also open for at least one day during the month.

Those participants who otherwise would not be eligible to receive the maximum of \$25 for WE/SIWE 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 WE/SIWE. If the documented expenses (regardless of the hours of participation) exceed the maximum of \$25 for WE/SIWE, 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: Only one FSR can be earned in a month, even if more than one qualifying activity is open in that month.

Change 2: In an effort to assist the OWP 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 the OWP staff the opportunity to spend more time assisting program participants directly.

Phase 1 of the automation project reduces the amount of time and paperwork the OWP 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 OWP case must be created, a case must be reopened and served in an OWP unit or a case must transfer to an area that is providing OWP 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 OWP participants whose cases are created, reopened or transferred to an area that is providing OWP services because of information relayed from the FLORIDA system.

The OWP staff can stop the automated process which is designed to eliminate clerical duties associated with non compliant participants if the participant responds and complies according to the instructions sent in the letter. The OWP 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 OWP case.

According to Florida law, the AWI operates all employment and training-related programs. The AWI continues to be responsible for administering the OWP contracts, with technical assistance provided by the DCF Program staff.

Each County Board of County Commissioners has requested that the OWP for its county be renewed for another year. Florida wishes to renew the OWP for all three contracts.

3. **Population:** Nonexempt food stamp recipients, as defined in 7 CFR 273.7(a) and (b) and Able-Bodied Adults Without Dependents (ABAWDs), as defined in 273.24, are required to register for work and participate in the OWP.

Exemptions from work registration are defined in 7 CFR 273.7(b), and the exceptions to the ABAWD time limit are described in 273.24. In addition, a non-ABAWD household is deferred from participation if the household's monthly food stamp allotment is less than \$95 because it is not cost effective to assign those households to workfare sites.

The OWP participants may be excused from program participation by the 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.

Procedures for noncompliance described in the FFY 2008 Food Stamp Employment and Training Program plan apply to the Optional Workfare Program.

4. **Program Components:** The workfare component is the only mandatory component in the OWP. As long as the participant is

participating in the workfare component, (s)he may also participate in education/training components.

NOTE: 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 has 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.

B. Program Component

1. Component Summary

a. Name of Component: Workfare/Work Experience

1. Description of component: Workfare is a work component in which food stamp recipients perform work in a public service capacity as a condition of eligibility. In lieu of wages, workfare participants receive compensation in the form of their household's monthly food stamp allotment. The primary goal of workfare is to improve the recipient's employability and to encourage the recipient to move into regular employment while returning something of value to the community.

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)

Note: Self-Initiated Work Experience, although not part of this component, is an activity to which participants may also be assigned.

Work Experience sites are developed by the 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 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. Description of component structure: The OWP is administered by written contracts between AWI and three separate county governments. Workfare participants are placed at not-for-profit and public agency worksites to perform work equal to the value of their monthly food stamp allotment.
4. Geographic areas covered: Escambia County, Okaloosa County, Walton County, Holmes County, and Washington County.
5. Anticipated number of mandatory registrants who will be referred to the program: 12,600

(Escambia = 7,900; Walton = 2,060; Okaloosa = 2,640)

Holmes and Washington Counties are served out of Walton County and therefore are not shown separately.

6. Anticipated number of mandatory registrants who will begin WE/SIWE: 1,605

(Escambia = 1,203; Walton = 306; Okaloosa = 96)

Holmes and Washington Counties are served out of Walton County and therefore are not shown separately.

7. Anticipated number of volunteer registrants who will enter the component: -0-

8. Anticipated number of Notice of Adverse Actions (NOAAs) for noncompliance with the component: 5,000 (Escambia =3,035; Walton = 1,090; Okaloosa = 875).

Holmes and Washington Counties are served out of Walton County and therefore are not shown separately.

9. Targeted population: The targeted population is all food stamp work registrants who do not meet exemption, exception, or deferral criteria.

10. Level of participant effort: The maximum total number of hours of work required of a household each month shall be determined by dividing the household's food stamp allotment by the state minimum wage, with the maximum number of hours required being 30 per week. Optional Workfare Programs have the option to allow participants to find their own community work experience slot; however, this option will be used only if an appropriate worksite assignment cannot be located for the participant from existing worksites.

11. Organizational responsibilities: The public or not-for-profit agency must agree to allow the registrant to conduct job search activities during work hours, give assistance in applying for jobs that are available within that agency, and arrange work hours to complement any job preparation, education, or training activity in which the registrant may be involved. The operating agency will review the participant's attendance and performance at least monthly.

Per participant cost of participant reimbursement: This estimate is based on the percentage of funds utilized by each contract during FFY 2007.

Reimbursements will be authorized by the OWP 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.

Escambia (62%):	\$88,970
Okaloosa (17%):	\$24,395
Walton (21%):	\$30,135
Approximate Total =	\$143,500
Transportation and related costs:	\$143,500
Dependent care costs:	\$0
Amount of the Transportation:	\$143,500
State (50%):	\$71,750
Federal (50%):	\$71,750

12. Cost of the component per participant: \$75.88

(The approximate total of the three contract budgets is \$812,553, plus \$143,500 in participant reimbursements equals \$956,053.) ($\$956,053 / 12,600$ participants = \$75.88)

13. Total cost of component: \$956,053.
(Total of budgets for three contracts plus reimbursement costs)

14. Cost of Component excluding reimbursements: \$812,553
(Total of budgets for three contracts)

C. Contractual Arrangements

Financial contracts to provide OWP services have been executed and are managed strictly according to State of Florida law. Copies of the actual documents are available for inspection at the Agency for Workforce Innovation, 107 East Madison Street, Caldwell Building, Tallahassee, Florida 32399-4120 and the Department of Children and Families, 1317 Winewood Boulevard, Building 3, Room 412, Tallahassee, Florida 32399-0700.

1. Amount of the Contracts: \$812,553
State (50%): \$406,277
Federal (50%): \$406,277

Note: The amount of the contracts does not include the amount of reimbursements for the Optional Workfare counties.

2. Contract Management Approach: Performance Based, Cost Reimbursement.
3. Basis for Charging for Contractual Services: Actual costs per contract budget line items.
4. Monitoring of Optional Workfare Programs

The AWI is responsible for monitoring the OWP. The final monitoring review product for the OWP is a monitoring report that assesses the providers' compliance with the OWP requirements. In the event the monitoring report includes significant negative findings, a Corrective Action Plan (CAP) will be required from the provider. Technical assistance will be provided by the AWI and the DCF to assist the provider in its CAP process until all negative findings have been addressed to the satisfaction of the AWI. Copies of all state monitoring reports, schedules, and corrective action plans will be maintained at the AWI.

5. Contracts

The three OWP contract renewals have been signed by the applicable Board of County Commissioners and the AWI, with an effective date of July 1, 2007.