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STUDY OF THE FOOD STAMP EMPLOYMENT AND TRAINING PROGRAM: OPERATIONS, FUNDING, AND COORDINATION

Volume II: Descriptive Profiles of 15 Local Food Stamp Employment and Training (E&T) Programs

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Preface

The research team members wish to express our appreciation to the staff at the participating state and local Food Stamp agencies for their cooperation with the field research for this study. We also appreciate the assistance of our Project Officer at the Food and Nutrition Service--Barbara Fay Murphy--and the cooperation of Ellen Henigan, Director of the Operations Unit for the Food Stamp Employment and Training Program at FNS.

GLOSSARY

ABE:	Adult Basic Education
AFDC:	Aid to Families with Dependent Children
CBO:	Community-Based Organization
CWEP:	Community Work Experience Program
DOL:	Department of Labor
E&T:	Food Stamp Employment and Training Program
EDP:	Employability Development Plan
ES:	Employment Service
ESL:	English as a Second Language
FNS:	Food and Nutrition Service
FSA:	Food Stamp Agency
FSP:	Food Stamp Program
FY:	Fiscal Year
GA:	General Assistance
GED:	General Educational Development (Certification)
JOBS:	Job Opportunities and Basic Skills Training
JTPA:	Job Training Partnership Act
NOAA:	Notice of Adverse Action
NPA:	Non-Public Assistance
OJT:	On-the-Job Training
UI:	Unemployment Insurance

CONTENTS

INTRODUCTION	1-1
MERCED COUNTY, CALIFORNIA	1-1
JEFFERSON COUNTY, COLORADO	2-1
KOOTENAI COUNTY, IDAHO	3-1
WOODBURY COUNTY, IOWA	4-1
CADDO PARISH, LOUISIANA	5-1
WAYNE COUNTY, MICHIGAN	6-1
HINDS COUNTY, MISSISSIPPI	7-1
HUDSON COUNTY, NEW JERSEY	8-1
SUFFOLK COUNTY, NEW YORK	9-1
MONTGOMERY COUNTY, OHIO	10-1
McCURTAIN COUNTY, OKLAHOMA	11-1
ALLEGHENY COUNTY, PENNSYLVANIA	12-1
CAMPBELL COUNTY, TENNESSEE	13-1
GALVESTON COUNTY, TEXAS	14-1
NORFOLK CITY, VIRGINIA	15-1

EXHIBITS

1-1.	Client Flow: Merced, California	1-9
2-1.	Client Flow: Jefferson County, Colorado	2-7
3-1.	Client Flow: Kootenai County, Idaho	3-7
4-1.	Client Flow: Woodbury County, Iowa	4-8
5-1.	Client Flow: Caddo Parish, Louisiana	5-7
6-1.	Client Flow: Wayne County, Michigan	6-8
7-1.	Client Flow: Hinds County, Mississippi	7-9
8-1.	Client Flow: Hudson County, New Jersey	8-6
9-1.	Client Flow: Suffolk County, New York	9-12
10-1.	Client Flow: Montgomery County, Ohio	10-9
11-1.	Client Flow: McCurtain County, Oklahoma	11-6
12-1.	Client Flow: Allegheny County, Pennsylvania	12-7
13-1.	Client Flow: Campbell County, Tennessee	13-7
14-1.	Client Flow: Galveston County, Texas	14-7
15-1.	Client Flow: Norfolk City, Virginia	15-7

INTRODUCTION

The design and operation of the Food Stamp Employment and Training (E&T) Program were examined through detailed case studies of 15 local program sites. Study objectives included describing how state and local policymakers organized and designed the delivery of services to E&T participants, examining how different factors influence local program designs and operational procedures, and assessing the impact of service consolidation and coordination linkages on the services provided to program clients.

By describing and analyzing organizational, program design, and operational decisions, the research effort focused attention on how different factors influenced the ability of local Food Stamp E&T programs to address the employability barriers faced by program participants. Study findings (as described in Volume I of this report) should assist state and local program administrators responsible for the Food Stamp E&T program by describing how they can make strategic use of E&T funds to improve the employability of E&T participants in a variety of local program environments.

This volume of the study report includes descriptive profiles of each of the 15 study sites--summarizing the design and organizational features of the E&T program in each site. These descriptive profiles have been prepared for the purpose of disseminating information about variations in E&T program goals and objectives, organizational structures, service designs, and client targeting policies.

When examined together, the 15 descriptive profiles represent services available to Food Stamp Employment and Training participants nationwide. Individually, however, the descriptive profiles detail the design and operation of the Food Stamp E&T client flow and program services for the specific local area only and are not representative of the E&T program in that state (unless so noted).

Below, we provide the criteria used to select study sites, a description of the case study site visit methodology, and an overview of the content of the descriptive profiles.

SAMPLE OF LOCAL SITES

To meet the study objectives of providing detailed descriptions of the design and operation of the Food Stamp E&T Program in 15 representative local areas as well as producing a cross-site report that describes the variations in program design, development, and implementation, it was essential that selected sites be typical yet reflect the variation in policy, operational, and economic contexts that occur in the nation.

Because only 15 sites were selected for inclusion in the study, a stratified random sample was used to provide variation on important dimensions of the contexts within which the local Food Stamp E&T programs operate and the broad features of the E&T service designs selected at the state or local level.¹ A two-stage sample selection process was used to take advantage of the distinction between variables measured at the state and local levels. First, a sample of 15 states was selected. Then a sample of 15 local agencies, one in each state, was selected. The resulting sample of 15 Food Stamp agencies (FSAs) should be considered representative of all E&T mandatory work registrants nationwide, rather than as representative of the 15 sample states.

To provide a sample that would be representative of all individuals subject to the E&T participation requirement and that contained an appropriate mixture of large and small agencies, sampling was done with probability proportional to program size. At the state level, size was measured by the number of Food Stamp Program mandatory *nonexempt work* registrants. At the county² level, the number of Food Stamp recipients was used as the measure of program size. This was the best measure available at the local level.

¹ The dimensions selected met two criteria: they were likely to strongly affect E&T program operations in ways that are of interest to policymakers, and data were available or acquirable at the time of sample selection.

² One of the 15 study sites was an independent city. For simplicity, we use "county" or "local" to refer to the local Food Stamp agency.

State Selection Criteria and Sampling Procedures

Three state-level criteria were chosen as the stratifying variables in selecting the state sample:

- Whether the E&T program was state or locally administered.
- Whether the state offered an ongoing General Assistance (GA) Program for employable individuals at the state level or in the most populous county.
- Whether the state plan for E&T services placed a high, medium, or low emphasis on job search or job search training components.³

The state sample resulting from this stratified selection procedure consisted of 6 county-administered and 9 state-administered E&T programs; 7 states with ongoing GA benefits for employable individuals and 8 states without; and 7 states with a high emphasis on job search or job search training, 3 states with a medium emphasis, and 5 states with a low emphasis on job search or job search training in their E&T design.

Although the sample was formally stratified on the three criteria described above, its representativeness on several additional state-level variables was also maintained:

- The level of state fiscal effort on E&T, measured by state expenditures as a percentage of the total E&T budget.
- The percentage of all mandatory work registrants who are exempt from E&T participation.
- The percentage of all placements that are voluntary.
- Geographic distribution. The sample was designed to include representation from each of the seven Food Stamp Program Regions.

³ The emphasis on job search and job search training was obtained from FNS statistics for FY 1989, as reported by the individual states. High emphasis was defined as 75% or more of all E&T placements in these services, medium emphasis as 50% to 75% in these services, and low emphasis as less than 50% in these services.

County Selection Criteria and Sampling Procedures

The local site sample was stratified on two county-level criteria:

- Whether the local site had high, medium, or low unemployment.⁴
- Whether the local site was characterized by high, medium, or low urbanization.⁵

As a result of this sampling procedure, the final sample consisted of 8 counties with high urbanicity, 4 with medium urbanicity, and 3 with low urbanicity. Six counties with high unemployment were selected, 5 with medium unemployment, and 4 with low unemployment.

CASE STUDY METHOD

Depending on the size and complexity of the local E&T program, the case study was conducted by either a single site visitor or a two-person team. The site visits, which ranged from 5 to 8 days, consisted of the following activities:

- Review of existing documents.
- On-site discussions with key respondents.
- Observations of service delivery.
- On-site reviews of client files.
- Collection of aggregate program statistics.

A multiple case study method allowed us to capture the variations in design and practice as comprehensively as possible.

⁴ Unemployment data were obtained from the Bureau of Labor Statistics Local Area Unemployment Statistics for 1989.

⁵ The urbanicity categories were created to reflect common use of the terms high, medium, and low urbanicity. The following are the categories used: Low--at or below 60% population in urbanized area; Medium--60% to 90% population in urbanized area; High--at or above 90% population in urbanized area.

Descriptive Profiles of Case Study Sites

The descriptive profiles provide a brief summary of the design and organizational features of the E&T program in each site. Specifically, the descriptive profiles include the following data: organizational features, programmatic responsibilities, service providers used, funding levels, participation requirements, client targeting policies and client flow sequence, E&T service components, and a discussion of how coordination/consolidation with other services affects the operation of the program.

Included in each descriptive profile is a flow chart that illustrates the client flow through services. When relevant, participation by volunteers is illustrated, as well as participant flow for mandatory nonexempt work registrants. Volunteers, however, are not subject to sanction for noncooperation in the E&T program.

The flow charts illustrate the possible service options available to participants at different stages of E&T participation, without indicating the frequency with which different service options are actually used. Participant volume in specific service components is described in the text of the descriptive profile.

**FOOD STAMP EMPLOYMENT AND TRAINING PROGRAM DESCRIPTIVE PROFILE
MERCED COUNTY, CALIFORNIA**

Case Study Site: Merced County, California.

Name of Program: Food Stamp Employment and Training Program.

The Food Stamp Employment and Training (E&T)¹ program is administered at the county level in California, with local welfare agencies responsible for policy development, program design, and administration. Merced County's Employment & Training Services offices and facilities are part of the county Human Services Agency, headquartered in the city of Merced. (The county maintains an additional Human Services office in the town of Los Banos, but no E&T services are available at that site.) The county Employment and Training Services office also administers the county's GAIN program (the state's JOBS program for AFDC recipients), as well as several employment programs targeted to refugees. Merced County funds a General Assistance (GA) program. Employable GA recipients are required to participate in the E&T program, as funding for paid work experience slots becomes available, and are otherwise required to participate in a county-run GA workfare program to "work off" their GA grants at work sites arranged by the county GA E&T counselor.

State Agency Responsible for the E&T Program

California Department of Social Services, Employment Programs Branch,
GAIN and Employment Services Policy Bureau.

Local Agency Responsible for the E&T Program

Merced County Human Services Agency, Employment and Training Services.

¹ The Food Stamp Employment and Training program in California will be referred to as "E&T" throughout this descriptive profile.

State and Local Roles and Responsibilities

California's Department of Social Services has provided local areas with program planning guidelines, and allows local welfare agencies to autonomously develop and design their E&T programs. The California state E&T plan allows six service components: independent job search, supervised job search, job search training (job club/job search workshop), workfare, vocational training, and on-the-job-training.

Within these broad guidelines, the State Department of Social Services has delegated design and administration of E&T programs to local welfare agencies. Merced County offers two components to all E&T participants: job club and supervised job search. A select number of E&T work registrants receiving GA also participate in a third component--120-day work experience, for which they are paid minimum wage. The work experience component for E&T participants receiving GA is funded through JTPA 6% incentive funds.² (Funding limits preclude the participation of all E&T work registrants receiving GA in this component, so priority for participation in the work experience component is given to those who are thought most likely to benefit from the additional services.) The county Human Services Agency has contracted with the Private Industry Training Department (the county department acting as the local JTPA agency) for the operation of each of these components.

Location of Program Responsibility Within Local FSA

Family Assistance Representatives within the agency's Eligibility Services unit are responsible for referring work registrants to the Employment and Training Services Unit.

² Six percent of each year's JTPA formula allocation to the states is held in reserve for technical assistance and incentive awards to service delivery areas (SDAs) that exceed their performance standards. Once awarded to SDAs, 6% incentive awards may be used for any training activity and, in California, are not subject to performance standards. In this case, Merced County SDA decided to use some of its 6% incentive award for a specific project, i.e., work experience.

Staff in the E&T unit administer individual E&T exemptions, oversee service delivery of the three components provided by JTPA, monitor participant progress, and authorize supportive services payments. E&T unit case managers handle determination of whether there is good cause for E&T participants' noncompliance, but once a negative determination is made, the E&T unit's file is closed and the case is referred to the eligibility unit for the issuance of a Notice of Adverse Action (NOAA).

Types of Services Providers Used

The local JTPA administrative entity has contracted to provide job club, job search, and work experience components. E&T funds are used to reimburse JTPA for staff time used in the delivery of these components; JTPA 6% funds pay for GA participants' hourly wages in the work experience component. JTPA staff operating the E&T components are collocated with the county Employment and Training Services unit.

Other agencies that are available, in theory, to provide services to E&T participants through JTPA-funded contracts include: Merced Adult School (for basic skills and GED instruction), Merced Adult Remedial Center, jointly funded by JTPA and Adult Education (for basic skills training), and the Central Valley Opportunity Center, Adult Education, Merced College, San Joaquin Valley College, and Western Truck Driving School (for vocational skills training). These services can be provided at no cost to the E&T program, using existing JTPA resources and other program funds. Unfortunately, these referral resources do not appear to be significantly utilized at the present time for Food Stamp E&T clients.

State and Federal Funding

Per California's E&T plan for FY 91, total state program funding was \$19,994,485. Federal 100% funds for program operations totaled \$8,216,530, with additional matched program funds (state plus federal) for the E&T program of \$7,980,401. Participant supportive services were budgeted at

\$3,797,554 (funded 50% by the state and/or county level). Overall, the federal share for California E&T programs was \$14,092,879, or about 70%.

Merced County's E&T budget for FY 91 totaled \$153,920, including \$74,000 in contractor costs for the provision of the three components, \$72,000 for HSA overhead, \$4,800 for rent and utilities, and \$3,120 toward supportive services. Wages for work experience clients were not charged to this E&T budget.

California requires local agencies to contribute half the nonfederal matching funds for both supportive services and regular program operations, and to fully fund the nonfederal match for any E&T expenditures over a cap set by the state during the budgeting process. Most California counties provide no additional local funds so they receive only 100% federal funding.

Merced County contributes local funds. Of the total budget of \$153,920 for program operations and supportive services for FY 91, \$116,856 is covered by 100% federal formula funds. With a cap for 50% federal/25% state/25% county matching funds at \$22,214, and an additional \$12,776 funded by 50% federal/50% county funds, the federal matching funds totaled \$17,495, while the state contributed \$5,553, and the local share of matching funds was \$11,941.

Supportive services, budgeted at \$3,120, were to be shared by the federal, state, and local matching scheme, with 50% provided by the federal agency, 25% by the state, and 25% by the county of Merced.

Estimates of individual component costs, per the state's plan for FY 91, are \$65 per participant for Supervised Job Search, \$265 for Job Search Training, and \$147 for Workfare. Merced County estimates individual component costs to be \$148 for job club, \$73 for job search and \$1,360 (funded by JTPA) for the work experience component.

I. FOOD STAMP EMPLOYMENT AND TRAINING PARTICIPATION REQUIREMENTS

Mandatory Participants and Exemption Categories

Individuals receiving Food Stamps are subject to Food Stamp work registration/E&T participation requirements unless they are (1) receiving Aid to Families with Dependent Children (AFDC), in which case they are subject to the requirements of the federal JOBS program rather than the Food Stamp E&T Program, (2) exempt according to federal exemption criteria, or (3) exempt according to state categorical or individual exemption criteria.

Per the state's plan, mandatory work registrants participating in "GA or Refugee Employment Programs are considered work registered in the food stamp program and are deferred from participation in E&T when the total combined hours of participation in the work program exceed those required in the FSET program." Categorical exemptions are limited to 18 counties and 5 counties with partial exemptions, because of depressed economies and low work registrant populations. California does not exempt individuals from participation while in their first 30 days of food stamp receipt.

Merced County Human Services estimates that 73% of the food stamp recipient caseload will be federally exempt from participation in the E&T program because of enrollment in GAIN, California's JOBS program. Individual work registrants may be exempted by E&T staff case workers from E&T participation because of (1) geographic remoteness, (2) physical or mental problems, (3) lack of child care, (4) lack of transportation, (5) family difficulties, (6) legal difficulties, (7) temporary unemployment if they are expected to return to work within 60 days, or (8) participation in a substitute program (e.g., one of the state's E&T programs targeted to refugees).

Participant Volume and Extent of Participation by Volunteers

The Merced County E&T services unit planned to serve 377 mandatory work registrants during FY 91, from an estimated total pool of 8,028 work registrants, 5,889 of whom (73%) are estimated to be exempt because of individual (545) or substitute program (5,344) deferrals. During the period from October 1990 through June 1991, the unit placed 253 participants in E&T program components. Volunteers are not eligible for the program, per the county's plan.

Description of Sanctioning Procedures

JTPA employment specialists notify county E&T case managers of clients who fail to fulfill the responsibilities of the service component to which they are assigned. E&T case managers may make a determination of good cause by phone or in person, and must make a determination within ten working days of participant noncompliance. Generally, participants who have failed to keep their responsibilities are requested to attend the next scheduled job club, which is the beginning of the services sequence, i.e., participants must repeat all components if they fail to complete any one. If no good cause is determined, case managers notify the appropriate eligibility (FARS) case worker, who is responsible for issuing a notice of adverse action (NOAA) to the client, notifying them of sanctioning procedures.

From October 1990 through June 1991, 160 work registrants were sent notices of adverse action, while the pool of new mandatory nonexempt work registrants was 826--an approximate 19% NOAA rate.

II. CLIENT TARGETING POLICIES AND CLIENT FLOW SEQUENCE

Client Targeting Policies

Two groups are targeted for enrollment in the Merced County E&T program: (1) new Food Stamp recipients ("applicants") who are not receiving public

assistance, and (2) Food Stamp recipients who are receiving General Assistance. Limited funds preclude services to volunteers. FS recipients who warrant temporary individual deferrals (less than 30 days) are monitored by E&T case managers; those cases with long-term exemptions are closed by E&T, and are reevaluated at the time of recertification of eligibility (the certification period is 12 months).

As JTPA funding levels have limited the number of General Assistance E&T work experience slots for GA recipients to 41, GA recipients are referred to the E&T program as work experience slots become available. Generally, those thought most likely to benefit from the program have priority for these slots. All other GA/Food Stamp recipients are exempted from E&T while they participate in a mandatory county-run GA workfare (unpaid work experience) program.

Client Flow And Service Sequencing

Mandatory work registrants are referred to the E&T unit by eligibility case workers. Registrants are required to report directly to the E&T unit receptionist for initial screening for individual exemptions and to schedule an orientation. The E&T unit receives a copy of the referral form from the FSP eligibility unit. If the participant is not exempt per state and/or local exemptions, the E&T unit requests an E&T file be opened by the central files unit, and the participant is scheduled to participate in a group orientation provided by E&T case managers. Those participants who fail to report to E&T for the screening are scheduled for one of the weekly orientations and are informed by mail; their cases are opened as well.

Orientation provides participants with information regarding temporary deferrals and longer-term exemptions, rights and responsibilities, and a description of service components. They are then referred to the job club component, provided by the local JTPA entity, which has staff collocated with the county's E&T offices.

Exhibit 1-1 details client flow through the E&T program. All participants (new non-public assistance Food Stamp recipients and GA/Food Stamp recipients) are required to complete the 4-day job club component and the subsequent 2-day supervised job search component operated by the JTPA agency. General Assistance recipients who do not obtain full-time employment at this point may then be scheduled for a 120-day paid work experience component, also operated by the JTPA agency, using JTPA 6% funds.

Once participants complete the job club and job search components (and GA recipients complete the work experience component), they have fulfilled the requirements of the program and their Food Stamp E&T cases are closed. Participation in the program is required only once per year. If participants have not obtained full-time employment, they are encouraged to utilize the JTPA E&T staff for additional job development services.

Services provided to E&T participants by JTPA staff after their participation in the formal E&T program components are not counted as additional placements in the E&T program. Generally, JTPA staff provide post-E&T program job development services. In theory, basic education and vocational training services are also available through referral to the JTPA program, but referral to these services was not initiated for E&T participants in Merced County during FY 91.

III. E&T SERVICE COMPONENTS

Services Required for Some or All Work Registrants

Participation in the orientation, job club, and job search components are required of all nonexempt mandatory work registrants. In addition, those nonexempt E&T work registrants receiving GA are required to participate in the work experience component as part of the E&T requirements. Participation in the program is required only once a year. During the period from October 1990 through June 1991, 220 individuals were placed in the job club

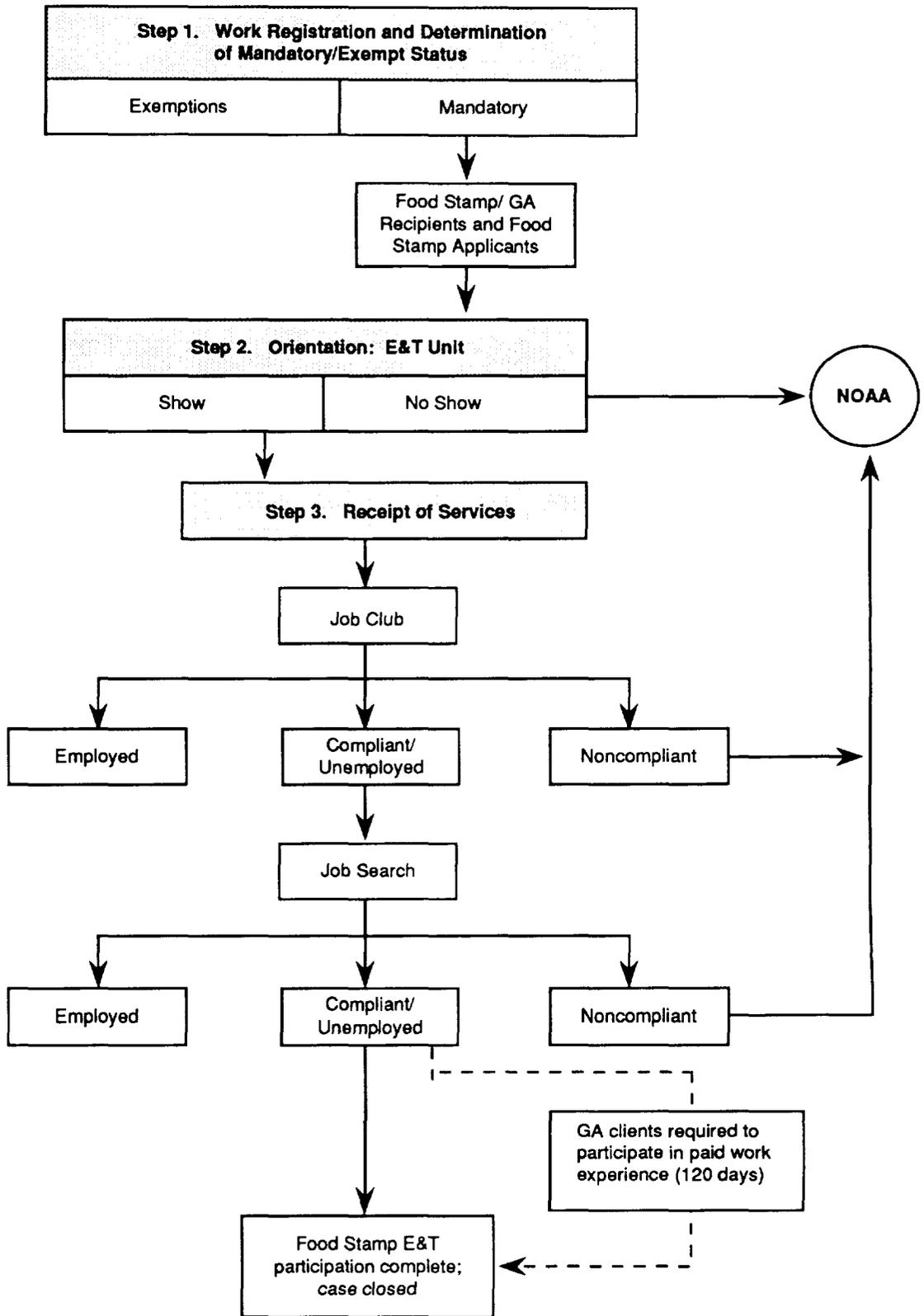


EXHIBIT 1-1 CLIENT FLOW: MERCED, CALIFORNIA

component, 145 completed the job club and job search components, and 33 were referred to the work experience component.

The job club component includes assessment of basic skills and vocational interests; career exploration; and instruction on job-seeking skills, including job application and resume development, labor market research, interview skills, and budgeting. JTPA staff also address clients' self-defined barriers to employment and attempt to improve attitudes and self-esteem. This component lasts 4 days and totals about 24 hours of client participation in services.

Following the job club, participants are required to conduct an individual job search, consisting of at least 12 employer contacts. Individual case management interviews with the JTPA E&T specialist are scheduled at the completion of the job search. During this interview, an Employment Development Plan (EDP) is developed and reviewed by staff, with participant input. At this point, GA recipients are placed in the work experience component and co-enrolled into the JTPA 6% program. The work experience component provides participants with minimum wages for a 20-hour-per-week job assignment lasting 120 days. Job assignments, developed by one JTPA E&T specialist, are with private nonprofit or public agencies. They are similar to, and in some cases the same location as, unpaid slots developed by county staff for the GA workfare program, but are of a much greater length, i.e., more work hours per month, and have specific training agendas.

Failure to participate in these required components at any point may subject the client to a NOAA and the threat of sanctioning. Cause determination is made by the E&T case manager. The JTPA service provider reports to E&T case managers on a daily basis during the job club via time and attendance records, and provides copies of clients' employer contacts and EDPs as evidence of the job search component. Notification of noncompliance is given to eligibility case workers within 5 days of a "without good cause" determination.

Supportive services during program participation include support for transportation and child care, with maximum levels of \$25 and \$160, respectively. In practice, however, most support needed is for transportation costs, either in the form of bus passes or reimbursements for car expenses (26 cents per mile). Bus passes are provided at the participants' initial reception to the E&T unit, if needed.

Additional Services That Can Be Requested by Mandatory Registrants or Volunteers

All participants in the E&T program have the option of enrolling in JTPA activities after completing the required E&T program components. Generally, they continue to access JTPA job development services, which is primarily job search assistance and counseling, at the county E&T offices. Clients interested in vocational training may be referred to counselors at the JTPA's main office, located in downtown Merced. Post-E&T program enrollment in JTPA is voluntary, and is not overseen by the county E&T case managers.

IV. HOW COORDINATION/CONSOLIDATION AFFECTS THE OPERATION OF THE FOOD STAMP E&T PROGRAM

Consolidation Linkages

The E&T program is administered by the Merced County E&T Services unit, under the county's Human Services Department. This unit is also responsible for administration of employment and training services through the GAIN program, and for four employment programs targeted to refugees. Most county staff responsible for the E&T program have responsibilities pertaining to multiple programs; for example, the one full-time E&T case manager position is filled by two case managers, who each spend the other half of their time managing GAIN client cases. This allows more efficient use of staff time, more accurate identification of appropriate program enrollment, and better coordination of funding sources. Eligibility and sanctioning functions are

carried out by the Family Assistance unit of the county's HSA, which uses consolidated caseloads for AFDC, GA, and FSP.

JTPA staff, who provide direct component services to participants in all public assistance work programs, are housed on-site at the county's E&T Services unit. At the direct service level, however, JTPA staff operating E&T programs are generally assigned to a specific program. Thus, 2 of the 12 JTPA program specialists are responsible for services to E&T clients only. Program services held at the site are also program specific.

Service Coordination Linkages

Nonfinancial Linkages

According to program administrators and operators, E&T program linkages with the JTPA system facilitate referrals of E&T clients not yet employed to adult basic education and to vocational training programs. No such referrals have been made this program year, however.

Direct Financial Coordination Linkages - Use of JTPA as Funded Provider

The JTPA agency is an experienced provider of employment and training services to the economically disadvantaged and other participants eligible for JTPA programs and for the county's GAIN program. This experience was crucial in the decision by the county E&T unit to utilize the agency to develop and operate E&T component services. JTPA operates the E&T and GAIN programs at the county Human Services E&T offices, separately from its federally-funded Title II-A and Title III JTPA program operations and with distinct staff and services.

The collocation of the JTPA staff operating public assistance work programs with the county E&T unit provides the potential for smooth transition for participants from E&T program participation to continued services funded through JTPA. After E&T participants complete E&T program

requirements, they may be immediately enrolled into mainstream JTPA services, and can also continue to receive job search assistance from the E&T JTPA staff. JTPA staff continue to track individuals' progress subsequent to E&T case closure. During the period from October 1990 through June 1991, 23 non-public assistance work registrants and 3 GA/FSP work registrants entered full-time employment after completing the E&T program, according to JTPA records.

**FOOD STAMP EMPLOYMENT AND TRAINING PROGRAM DESCRIPTIVE PROFILE
JEFFERSON COUNTY, COLORADO**

Case Study Site: Jefferson County, Colorado.

Name of Program: Employment First.

In Colorado, the Food Stamp Employment and Training program (E&T)¹ is a state supervised, county administered program for individuals receiving Food Stamps. The Food Stamp E&T program is a distinct program that operates in 37 of the state's 63 counties and primarily serves clients receiving only Food Stamp (FS) benefits. In most counties, AFDC/FS recipients are required to participate in the Job Opportunities and Basic Skills (JOBS) program. In six counties where Employment First is operating but the JOBS program for AFDC recipients is not, AFDC/FS recipients are also subject to E&T work registration and program participation requirements if not otherwise exempt. Colorado does not operate a statewide General Assistance (GA) program; provision of GA is left to the discretion of each county. Jefferson County provides GA only one time per year to families and disabled individuals in crises, e.g., those with emergency rental and utility needs. Thus, GA recipients are not subject to any additional state or local work requirements.

Jefferson County was one of three counties in the state of Colorado to participate in the Food Stamp Employment and Training Demonstration in 1983. In Colorado, this demonstration involved requiring independent job search (in Jefferson County, counselor-assisted job search) of mandatory work registrants and sanctioning those who failed to comply. This resulted in work sanctions being implemented for many Food Stamp recipients. In 1985/86, Jefferson County added job search training, education, and vocational training components to its program design.

¹ The Food Stamp Employment and Training program in Colorado will be referred to as "E&T" throughout this descriptive profile.

State Agency Responsible for the FS E&T Program

Colorado Department of Social Services, Work Program Division,
Employment First Program Unit.

Local Agency Responsible for the FS E&T Program

Jefferson County Department of Social Services, Adult Services Division,
Family Self-Sufficiency Programs.

State and Local Roles and Responsibilities

Colorado Department of Social Services, Work Program Division E&T staff, determines statewide work registration/exemption policies and allocates Food Stamp E&T funds to counties based on a formula that includes factors for process, outcome, impact rate, and program management. Throughout the state, E&T participants are required to conduct an initial self-directed job search and participate actively in E&T as long as they receive Food Stamps. The state has designed nine additional components for E&T: counselor-assisted job search, job club, critical competencies, telemarketing, workfare/work experience/OJT, basic skills, vocational training, assessment, and pre-employment skills. Local counties may choose which of these additional components they wish to operate.

E&T state staff provide technical assistance, monitor local program operations, and organize a statewide annual conference. State staff are responsible for generating reports from the state's automated management information system and sending hard copies to local offices.

Counties may operate E&T programs in-house in the local department of social services or contract for services with outside providers. Presently, Food Stamp E&T services are operating in 37 of 63 counties.

While Jefferson County offers a range of six service components, self-directed job search is the required first component for all participants and

accounted for 75% of the county's service placements between July 1, 1990, and May 31, 1991. Additional components offered in Jefferson County include job club (10%), counselor-assisted job search (10%), assessment (2%), vocational training (2%), and education (<1%).

Location of Program Responsibility Within Local FSA

In Jefferson County, work registration and referral of voluntary and mandatory work registrants to the E&T program are performed by Food Stamp eligibility technicians. Scheduling of participants for orientation is performed by the E&T secretary; orientation and case management of E&T clients is performed by two E&T counselors. The Food Stamp eligibility technicians and the E&T counselors are collocated but work in different divisions of the Department of Social Services.

The Family Self-Sufficiency Program unit includes E&T program staff, JOBS staff, and the Daycare Services program staff. Dependent care expenses for E&T participants up to \$160 per dependent per month are administered by E&T staff. Drop-in child care in the Department of Social Services building is also available to all participants. Thus, free child care services are available for parents scheduled for orientation, job club, or follow-up appointment interviews.

Types of Service Providers Used

The Food Stamp E&T unit in Jefferson County conducts orientation, monitors self-directed and counselor-assisted job search activities, and is responsible for case management of E&T clients.

Job club is provided by the local JTPA program, which is collocated with the Department of Social Services in the county Human Services building. Other education and training services are also provided by the JTPA service system through referral to community colleges and the public school system. No E&T funds are used to purchase services from other providers outside the Department of Social Services. Such services are provided through nonfinancial coordination and referral linkages.

State and Federal Funding

For FY 1991, the statewide budget for Colorado's Food Stamp E&T program totaled \$3.8 million. Federal formula funds accounted for \$1.2 million and 50% federal/50% state/county funds for program costs totaled an additional \$1.9 million. Transportation and dependent care costs were also shared 50% federal/50% state/county and totaled \$744,000. Overall, 65% of the budget was federally funded from Department of Agriculture E&T funds, and 35% from state and county contributions. The state requires counties to contribute 20% to the state match of federal funds; thus, for every \$8 in state matching funds, the county must contribute \$2.

Jefferson County's actual expenditures for the E&T program for January through December 1990 was \$125,376. Of this amount, approximately two-thirds of the costs were federally funded with the remainder, approximately \$42,000, to be shared from state and county contributions. While the true local share should have been approximately \$8,500, local contributions from Jefferson County totaled \$23,824. Thus, the county contributed funds beyond the 20% local match to pay for a portion of staff salaries and operating costs not covered by federal, state, or the required county match funds.

I. FOOD STAMP EMPLOYMENT AND TRAINING PROGRAM PARTICIPATION REQUIREMENTS

Mandatory Participants and Exemption Categories

Food Stamp recipients are subject to Food Stamp work registration/E&T participation requirements unless they are exempt according to federal exemption criteria or exempt according to state categorical or individual exemption criteria.

Colorado requested categorical exemptions for counties with an unemployment rate greater than 10% and/or counties with less than 500 mandatory work registrants. Thus, 6,624 of 52,335 (12.7%) work registrants were expected to be categorically exempt according to the state plan (26 of the 63 counties are categorically exempt).

The state also permits counties to implement eight individual "grey exemption" categories that identify personal characteristics or situations that justify exempting individuals otherwise required to participate in the E&T program. Individual "grey" exemptions include those with any of the following characteristics: determined not job ready, having transportation problems, in transitional living situations, non-English speaking, pregnant, legal actions pending, more than 1 hour from E&T office, and job-attached individuals. However, for each "grey" exemption applied, counties lose points in the state's funding allocation formula.

Jefferson County's 1991 plan estimated that 60 individual exemptions would be granted for individuals who were job attached or having transportation problems. However, data from July 1, 1990, through May 31, 1991, indicated that Jefferson County did not grant any individual exemptions.

Participant Volume and Extent of Participation by Volunteers

During FY 91, Jefferson County anticipated serving (this includes sanctioning) approximately 1,620 E&T mandatory participants. Of the 1,620 participants, 60 were projected to be volunteer participants.

Description of Sanctioning Procedures

Sanctioning procedures are initiated by E&T counselors for individuals who fail to comply with program requirements, e.g., fail to show for two scheduled orientation sessions or two follow-up appointments, or fail to participate in job club as assigned. The E&T counselors send notices of noncompliance to the Food Stamp eligibility technicians, who in turn send NOAAs to noncompliant participants. Jefferson County estimated that 780 NOAAs would be sent during FY 91 for the anticipated 1,620 mandatory work registrants. Of these, approximately 720 NOAAs were anticipated to result in sanctions being applied. This sanctioning rate comprises approximately 44% of the mandatory nonexempt pool required to participate in the E&T program.

II. CLIENT TARGETING POLICIES AND CLIENT FLOW SEQUENCE

Client Targeting Policies

Within the mandatory registrant pool in Jefferson County, there are no client targeting policies. All mandatory registrants are required to conduct an initial self-directed job search and to participate in some E&T component as long as they receive FS benefits. While the PY 91 Jefferson County plan indicated that 60 individual exemptions would be granted for mandatory work registrants who were job attached or had transportation problems; as of May 31, 1991 no exemptions had been applied. The goal of the program is to serve all mandatory work registrants because it is the county's and state's philosophy that all able-bodied clients receiving FS benefits should be actively seeking employment or be sanctioned for noncompliance.

Client Flow and Service Sequencing

Exhibit 2-1 details the client flow process through the E&T program in Jefferson County. Once work registration status is determined, mandatory work registrants and volunteers are scheduled for a group orientation session approximately 10 days after their date of referral to the E&T unit. While 15 participants are scheduled for each orientation session, only about 5 to 7 clients typically attend each session. One of the two E&T counselors staffs the orientation session.

All mandatory work registrants and volunteers are required to conduct an initial self-directed job search. Assignment to this component is made at orientation. Each participant is scheduled for a follow-up monitoring interview with his E&T counselor 4 weeks from the date of orientation. Clients who are still unemployed on completion of the 4-week self-directed job search component are typically assigned to job club or counselor-assisted job search, although clients may also be assigned to assessment, education, or vocational training components at the discretion of the E&T counselor if warranted by individual circumstances.

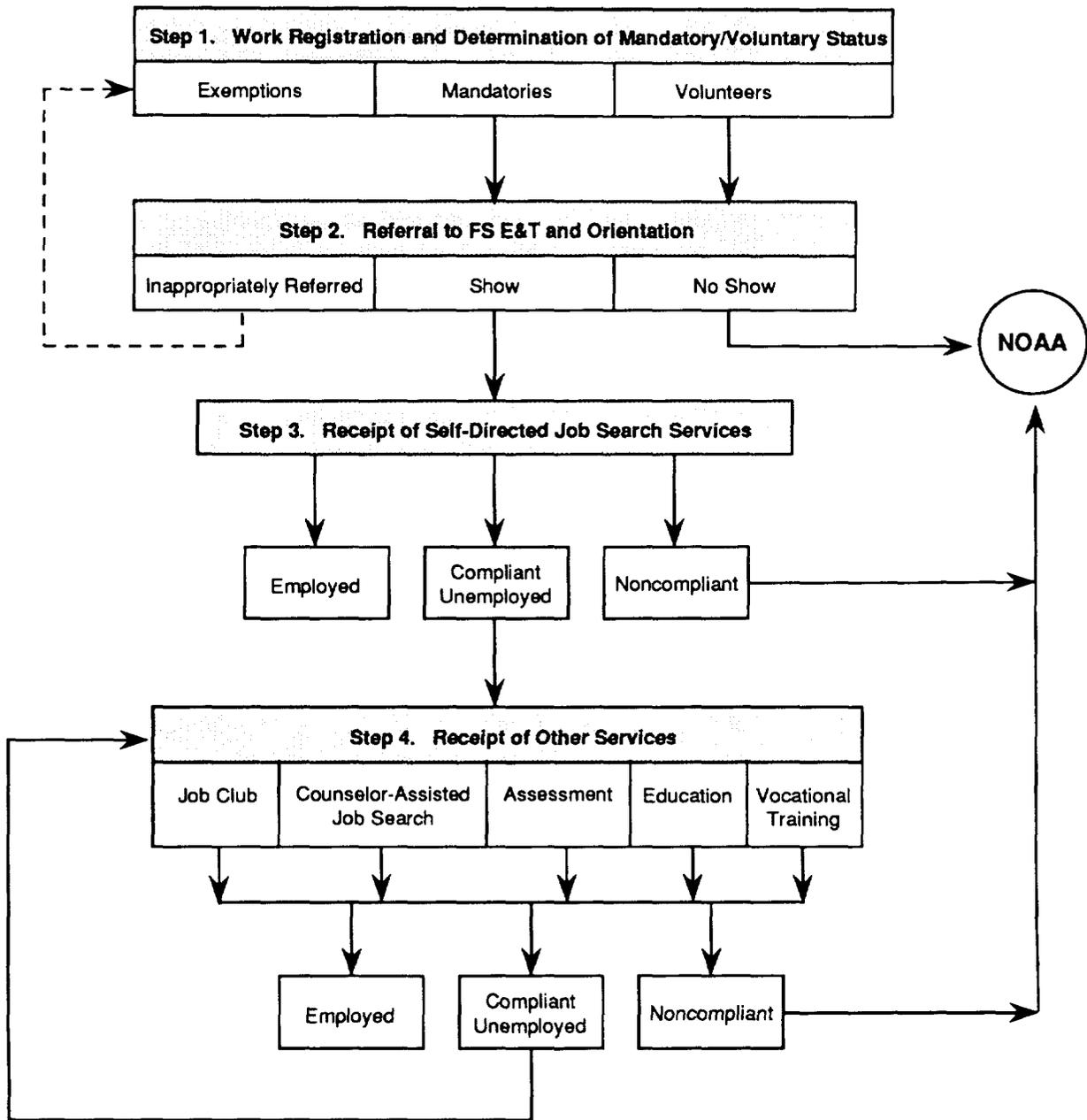


EXHIBIT 2-1 CLIENT FLOW: JEFFERSON COUNTY, COLORADO

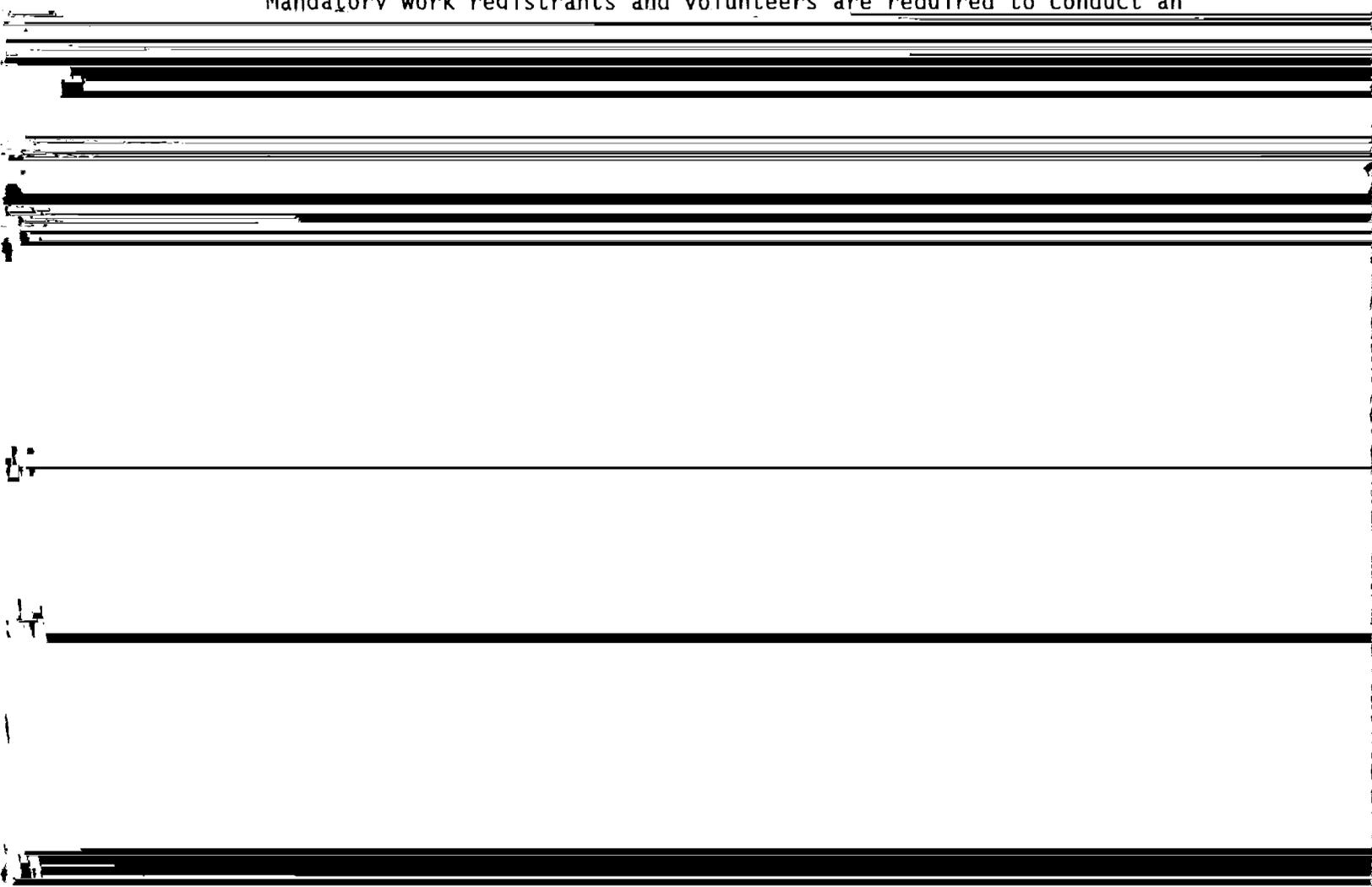
Participants assigned to counselor-assisted job search meet with their counselors weekly to discuss job leads, interviews, and job-seeking strategies. Also provided during this weekly appointment are job referrals and interview appointments. Participants assigned to other program components meet with their counselors monthly.

Continuous participation in an E&T component is required in Jefferson County; typically, clients are moved from one program component to another every 4 weeks. Thus, clients terminate from the E&T program when they become employed, are sanctioned, or are no longer Food Stamp beneficiaries.

III. E&T SERVICE COMPONENTS

Services Required for Some or All Work Registrants

Mandatory work registrants and volunteers are required to conduct an



in this component meet weekly with their E&T counselor to discuss strategies regarding the job search and receive job referrals and appointment interviews. Assessment, education, and training services are offered by E&T counselor referral to the JTPA program.

All components to which mandatory work registrants are assigned are considered required service components throughout their receipt of Food Stamp benefits.

During participation in self-directed job search and counselor-assisted job search, participants are eligible to receive up to \$25 per month for transportation expenses. The \$25 per month supportive service allowance is not automatically distributed to participating clients. Rather, clients are informed about the availability of supportive services and clients requesting assistance receive support. JTPA provides transportation support for E&T participants enrolled in program components offered by JTPA (this includes job club). Up to \$160 per month per child is provided for dependent care expenses when requested.

Additional Services That Can Be Requested by Mandatory Registrants or Volunteers

All E&T program options identified above are available to mandatory registrants and volunteers. There are no additional services that can be requested.

IV. HOW COORDINATION/CONSOLIDATION AFFECTS THE OPERATION OF THE FOOD STAMP E&T PROGRAM

Consolidation Linkages

Both the administration and oversight of the E&T and JOBS program are consolidated at the state and Jefferson County level. However, only E&T clients are served by E&T case workers and only JOBS clients are served by JOBS case workers.

Job club, provided by JTPA, is operated as a consolidated service. JTPA job club mixes E&T, JOBS, and JTPA participants. According to JTPA job club staff, the group process is enhanced rather than hindered by this grouping.

Service Coordination Linkages

Whenever possible, Jefferson County has emphasized building linkages with other providers of employment and training services to avoid duplication of services. Coordination of services has been facilitated in Jefferson County as Welfare, JTPA, and Employment Services are all collocated in the County Human Services building.

Financial Coordination Linkages

Throughout Colorado, the administration of E&T services is contracted by the county welfare agencies to a variety of different agencies, including: Job Service (11 counties), JTPA (9 counties), County Social Services (15 counties), State Social Services (1 county), and Goodwill Industries (1 county).

In Jefferson County, the Social Services agency administers E&T directly, and has no financial agreements for the provision of E&T services by outside service providers.

Nonfinancial Coordination Linkages

Jefferson County Department of Social Services (DSS) has a nonfinancial agreement with JTPA for the provision of services to DSS clients appropriate for services through JTPA. This agreement serves to facilitate services between FS E&T and JTPA. Specifically, JTPA is the service provider for four of the six local service components: assessment, job club, education, and vocational training. However, because of declining local JTPA funds and E&T emphasis on immediate employment, only limited numbers of E&T participants receive these services.

A linkage has also been forged between Jefferson County DSS and Employment Service. A JOBS placement counselor, the two E&T counselors, and two Employment Service staff are collocated in a Placement Office at the County Human Services building. Staff share job leads and participants are encouraged to use Employment Services' on-line job bank and employee microfiche listings throughout their job search. All staff in the Placement Office are cross trained and assist with other programs as needed.

**FOOD STAMP EMPLOYMENT AND TRAINING PROGRAM DESCRIPTIVE PROFILE
KOOTENAI COUNTY, IDAHO**

Case Study Site: Kootenai County, Idaho.

Name of Program: Job Search Assistance Program (JSAP).

The Food Stamp Employment and Training (E&T)¹ program in Idaho is a state administered program for individuals receiving only Food Stamp benefits. Of Idaho's 44 counties, 35 are categorically exempt, thus only 9 have mandatory, nonexempt work registrants. The Food Stamp E&T program operates in 4 of the most populous counties. The Job Opportunities and Basic Skills (JOBS) program is another work program operated by Idaho for individuals receiving Food Stamp benefits in conjunction with AFDC. Idaho does not have a General Assistance (GA) program.

State Agency Responsible for the E&T Program

Idaho Department of Health and Welfare, Bureau of Family Self Support.

Local Agency Responsible for the E&T Program

Region I of the Idaho Department of Health and Welfare, Bureau of Family Self Support (Kootenai County).

State and Local Roles and Responsibilities

The state of Idaho, Department of Health and Welfare, Bureau of Family Self Support (IDHW) determines which locations will have operational E&T programs, statewide work registration/exemption policies, and the allocation

¹ The Food Stamp Employment and Training program in Idaho will be referred to as "E&T" throughout this descriptive profile.

of E&T funds to local Departments of Health and Welfare. In addition, IDHW provides technical assistance and program/fiscal monitoring. State staff plan and administer both the JSAP and JOBS programs. The planning process for both programs was recently combined, and a joint procedures guide was written to address the requirements for both programs.

The Regional IDHW, Bureau of Family Self-Support administers the JSAP program as well as JOBS, in Kootenai County. The Kootenai County office has limited flexibility in implementing the JSAP program; most of the administrative procedures are developed at the state office. The local JSAP administrators determine how the client flow and case management systems will be organized and whether or not they will subcontract with another operator to provide E&T components.

The Kootenai County E&T unit conducts most components in-house, referring clients to local programs with additional funding sources for educational and vocational components.

Location of Program Responsibility Within Local FSA

Determination of work registration status and referral of mandatory work registrants to the E&T program are performed by eligibility examiners at the DHW's regional intake center in the city of Coeur de'Alene, which is adjacent to the Bureau of Family Self Support offices where E&T component services are delivered. The regional DHW center also conducts the conciliation/sanctions process for mandatory work registrants.

The Kootenai County DHW, Bureau of Family Self Support, E&T program unit conducts orientation, assessment, case management, and the job search and job readiness training components. E&T unit staff also approve transportation funds for participants and refer mandatory work registrants to the eligibility unit for sanctions.

Types of Service Providers Used

The E&T program unit in Kootenai County is the service provider for the individual and group job search and job readiness components. The work experience and on-the-job training (OJT) components are also administered by the E&T program unit, although very few participants are assigned to these activities.

Some E&T enrollees participate in educational activities, and job skills (vocational) training components through referrals to other local agencies and programs. Such linkages are generally nonfinancial. On occasion, however, the E&T program has paid for E&T enrollees who need inexpensive educational training, if no other funds are available (e.g., GED/ABE/ESL). However, no financial contracts have been developed with other agencies to provide services to E&T participants.

State and Federal Funding

The statewide budget for Idaho's Food Stamp E&T program in FY 1991 totalled \$456,740. Of the total budget, federal formula funds comprised \$249,696, and 50% state/50% federal funds for program costs totalled \$152,044. Shared state and federal (50%/50%) transportation and dependent care costs were budgeted at \$55,000. Overall, Idaho's contribution to the E&T budget for FY 91 was approximately 28%, while the portion of funds from the Department of Agriculture Food stamp E&T was approximately 72%.

Kootenai County's FY 1991 budget to operate the E&T program was \$76,124. Some funds (amounts undisclosed) from the state's General Revenues have been used for the E&T program, but generally these are small amounts for the unit supervisor's time and not provided in the budget.

The FY 1991 plan for Kootenai County's E&T program projected per participant costs for each component: (1) job search, \$136; (2) job readiness, \$133; (3) work experience, \$136; (4) educational training \$136; (5) job skills training \$46; (6) OJT, \$46.

I. FOOD STAMP EMPLOYMENT AND TRAINING PROGRAM PARTICIPATION REQUIREMENTS

Mandatory Participants and Exemption Categories

Idaho exempted a total of 6,166 work registrants from E&T or 47% of all work registrants. Categorical exemptions comprised the largest exemption category: 35 of the state's 44 counties are categorically exempt because there are fewer than 500 mandatory work registrants. The state projected this would affect 5,400 work registrants (approximately 42% of all work registrants).

Another 766 work registrants were projected to receive individual exemptions (approximately 6% of all work registrants). Individual exemptions include: (1) those with inadequate transportation, (2) those with children between 6 and 12 and who have no access to day care, (3) those who are "job attached," or who are temporarily laid off and expected to return within 90 to 120 days, (4) those who are in remote locations, (5) women in the second or third trimester of pregnancy or during postpartum recuperation, and (6) those who are injured or ill.

Kootenai County Regional DHW projected that there would be 1,146 work registrants in FY 91. Of those, 97 exemptions were planned, or 8% of the total work registrant population. These included 35 exemptions for transportation and 62 exemptions for job-attached participants.

Participant Volume and Extent of Participation by Volunteers

According to Kootenai County's FY 91 plan, which is based on previous years' experience and new projections, the E&T program was expected to serve 400 mandatory, nonexempt work registrants. Based on client activity data through June, 1991, 300 mandatory, nonexempt work registrants began components. These numbers reflect only mandatory, nonexempt E&T work registrants--Idaho does not provide services to volunteers.

The number of participants served in Kootenai County was increased after the end of the first quarter. The original FY 91 plan's focus was on providing a one-time job search to E&T participants; participants in Kootenai County now frequently enter two or more components, depending on their assessed needs.

Description of Sanctioning Procedures

Caseworkers at the E&T unit initiate sanctions by documenting all noncompliance and sending a request for sanctions to the eligibility unit for those who fail to meet participation requirements such as keeping assessment appointments or failing to attend component services. Eligibility workers are responsible for sending the NOAA to the client. Caseworkers in the E&T unit indicated most incidences of noncompliance occur when mandatory, nonexempt E&T work registrants fail to attend their initial assessment session. E&T unit staff said that the attendance rate at the initial orientations/assessment is often much lower than 50%. Based on participant data through June 1991, NOAAs were sent to 179 E&T work registrants. This comprises 36% of all mandatory, nonexempt E&T work registrants required to participate. Eligibility staff indicated that most NOAAs are cured before sanctions are imposed.

II. CLIENT TARGETING POLICIES AND CLIENT FLOW SEQUENCE

Client Targeting Policies

No targeting priorities were developed for the E&T program, either at the state or local levels. Kootenai County staff attempt to serve all mandatory, nonexempt work registrants. However, temporary deferrals may be used, at caseworker discretion, to excuse work registrants with barriers to participation. Their status is monitored by E&T unit staff until they are capable of entering a component. Staff at the E&T unit indicated that the characteristics of mandatory, nonexempt Food Stamp work registrants tend to be different from public assistance client groups: they are more transient

and difficult to follow-up, comprise more "homeless" than other groups, yet they may have more job skills and work experience than other public assistance groups.

Client Flow and Service Sequencing

Neither Idaho nor the Kootenai County E&T program has a fixed service sequence for E&T participants. There are no mandatory components that all participants must enter. Further there are no predetermined time requirements for the E&T program; although individual components may have expected periods of duration and recommended levels of effort. Participation may comprise one component or several. Thus, the service sequence is based on the assessed needs of the participant.

Exhibit 3-1 details the client flow through the E&T program. Upon referral to the E&T unit, Food Stamp work registrants attend an orientation and are assessed. During assessment, the E&T caseworker constructs an Employment Development Plan (EDP) with the client. The EDP becomes the road map, guiding clients' participation. E&T participants may be assigned to any of the six Food Stamp E&T components: (1) individual/group job search, (2) job readiness training, (3) educational activity, (4) job skills training (vocational component), (5) work experience, (6) on-the-job training (OJT).

The Kootenai County E&T unit provides individual and group job search, job readiness training (staff may also refer clients to a similar program at the local job service), and work experience. Participants are monitored at least every 2 weeks in these components, frequently more often. Participants may also be referred to other community providers for educational activities, job skill training, and OJT components. The E&T staff follow-up client progress at least monthly when they enroll in other agencies' programs.

Clients terminate from the E&T program when they are not longer receiving FS benefits or when they become employed. Termination upon employment is not automatic, however. E&T staff keep the program file open as long as 2 months for clients who become employed in minimum wage or

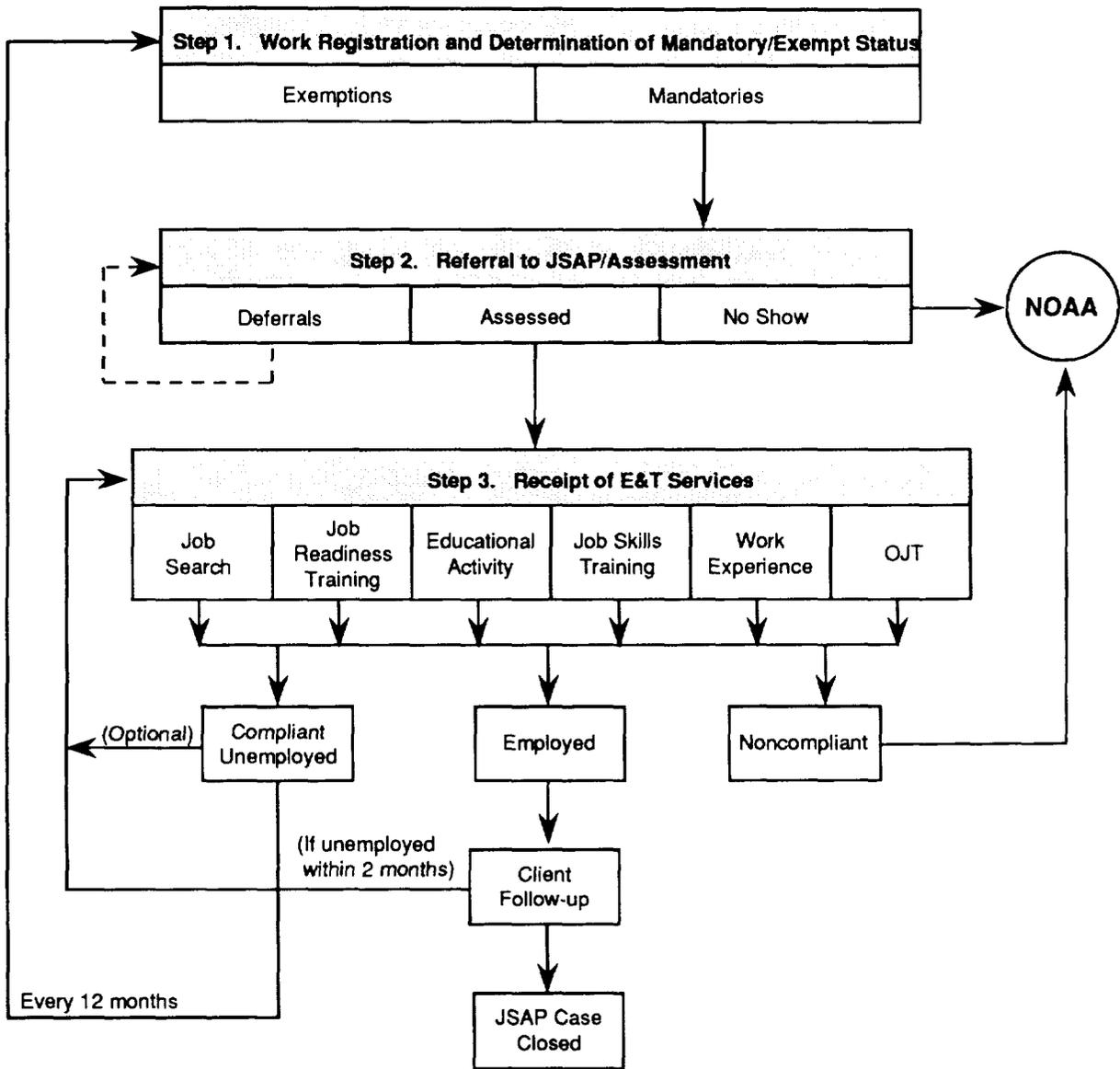


EXHIBIT 3-1 CLIENT FLOW: KOOTENAI COUNTY, IDAHO

seasonal jobs. During this time, E&T caseworkers continue to follow up with their clients, and, if they leave their jobs, the E&T unit brings them directly back into the program, reassessing clients' needs.

III. E&T SERVICE COMPONENTS

Services Required for Some or All Work Registrants

Participation is required, but the exact nature of participation is left up to the service plan developed by the E&T caseworker and participant. The individual job search component is the activity to which most clients are assigned. Job readiness training is another component that many E&T participants enter; it is usually offered concurrently with the job search, but clients may enter it after job search if they are still unemployed and the caseworker believes the training will substantially improve the client's ability to find a job. Participation data for Kootenai County for FY 1991 indicate that 45% of all service placements were in the job search component, and 40% were in the job readiness training component. The remaining placements were to components provided by other community resources, including educational activities (13%), job skills training (5%), and work experience (1%). No E&T participants were placed in the on-the-job training component in Kootenai County during FY 1991.

During participation in any component, clients are eligible to receive up to \$25/month for expenses such as transportation, clothes, glasses. Eligible participants may also receive up to \$160/month for dependent care expenses, but E&T staff report few request this supportive service.

Additional Services That Can Be Requested by Mandatory Registrants or Volunteers

Local E&T staff may persuade clients to enter additional components after they have completed their initial service plans. This is often the case when a client, initially assessed to complete only job search, is asked

to enter job readiness training. Clients may also request additional components once they complete their initial components.

Caseworkers also provide extensive referrals to other community resources, including referrals for mental health counseling, health care, or financial assistance from local community based organizations. However, no E&T services are provided to volunteers.

IV. HOW COORDINATION/CONSOLIDATION AFFECTS THE OPERATION OF THE FOOD STAMP E&T PROGRAM

Consolidation Linkages

State and local planning, administration, and oversight of the E&T program and the JOBS program are consolidated in the Bureau of Family Self Support. However, the operation of these programs is almost completely separate. Caseworkers in the E&T unit work only with E&T clients.

Recently, the state attempted to consolidate programs further by giving E&T components the same names used for JOBS. Further, the E&T program adopted the conciliation process used for JOBS participants. Conciliation occurs before the NOAAs have been sent and sanctions applied. This increases the time need to impose sanctions. Staff report that, since instituting the conciliation process for mandatory E&T work registrants, the sanctions process has become drawn out.

Service Coordination Linkages

Of the 381 people participating in the E&T program in October, 1991, 51 were in the educational activity component (GED/ABE), 18 were in the job skills training component (vocational education), and 5 were assigned to work experience. Most coordination arrangements are nonfinancial referrals to educational agencies and JTPA. The E&T program may pay for inexpensive GED or ABE courses if the agency has no funds for E&T participants, however.

Local resources are limited, with the largest providers being the North Idaho College, and the North Idaho Private Industry Council (JTPA programs), and the local employment service.

Service coordination is notable in Kootenai County because the linkages are extensive and frequently used. E&T program specialists make many referrals to local agencies and programs, often linking clients to programs that provide supportive services unavailable through the E&T program. Further, in most cases program specialist continue to track and monitor clients' progress while they participate in other programs.

**FOOD STAMP EMPLOYMENT AND TRAINING PROGRAM DESCRIPTIVE PROFILE
WOODBURY COUNTY, IOWA**

Case Study Site: Woodbury County, Iowa.

Name of Program: Food Stamp Employment and Training.

The Food Stamp Employment and Training (E&T) program¹ in Iowa is a state-administered program for Food Stamp recipients who are not receiving AFDC. Starting in FY 91, Iowa has limited the program to mandatory nonexempt work registrants in the five most populous counties. The state decided to concentrate its resources on these areas because of recent reductions in its E&T budget. Clients from all other counties are categorically exempt from E&T requirements.

AFDC recipients subject to employment and training program requirements participate in the PROMISE Job Opportunities and Basic Skills (JOBS) program. In Woodbury County there is also a work program tied to the county-administered General Assistance (GA) program. Able-bodied individuals who receive emergency aid under the county's GA grants are required to work off the grant by performing work for the city at minimum wage. When program requirements for E&T and GA coincide, GA work requirements are deferred until E&T participation has been completed.

State Agency Responsible for the FS E&T Program

Iowa Department of Human Services (DHS), Division of Economic Assistance, Work and Training Programs. The Iowa Department of Employment Services (DES) is contracted to provide FS E&T services on a statewide basis.

¹ The Food Stamp Employment and Training program in Iowa will be referred to as "E&T" throughout this descriptive profile.

Local Agency Responsible for the FS E&T Program

Woodbury County Department of Human Services (a local office of the state DHS) and the local office of the Job Service of Iowa (the name of local DES operations).

State and Local Roles and Responsibilities

E&T in Iowa is state administered. The state determines what agency will be contracted to provide services, the content and sequence of E&T components, client targeting practices, and the referral and sanctioning policies. At the state level, the Iowa Department of Human Services (DHS) oversees the Food Stamp Program (FSP). FSP is organizationally located in the DHS Economic Assistance Division. The Food Stamp assistance program and the Food Stamp E&T Program are both administered by the Food Stamp Bureau within that division. The operation of the Food Stamp E&T program has been contracted to the State Department of Employment Services (DES), Job Placement Division. The local service sites operated by this department are known as the Iowa Job Service.

In the five counties that currently operate E&T programs, local DHS and Job Service offices share responsibilities. Specifically, the responsibilities of local DHS offices include determining E&T work registration status, referring mandatory nonexempt work registrants to Job Service, and issuing sanctions. Job Service responsibilities include monitoring referred clients, conducting orientation (which is the first day of job club), job club, and independent job search, referring clients to other community agencies for additional services (education components, JTPA), and maintaining contact with DHS.

Location of Program Responsibility Within Local FSA

Income maintenance case workers at the county Department of Human Services determine the work registration status of Food Stamp applicants/recipients. Names and addresses of mandatory nonexempt work registrants are

sent to Job Service by means of a computer tape. Job Service is responsible for the actual operations of E&T components.

Types of Service Providers Used

Woodbury County Job Service operates job club and independent job search components under a financial agreement between the state DHS and the state DES. Education and training services are provided by outside providers. The local public school system handles GED and ABE services. Non-English-speaking participants have the option of receiving services from the Refugee Service Center. Participants interested in training are referred to JTPA, physically located at Western Iowa Tech Community College (WIT).

State and Federal Funding

Iowa's statewide budget for the E&T program FY 91 totaled \$716,250. Federal formula funds accounted for the bulk of this total (\$657,278); state funds were used only to match transportation and dependent care costs, and amounted to \$58,973. FY 91 total program funding decreased 24% from the previous year's level as a result of the state not exceeding the 35% participation rate requirement during FY 89.

DES allocates its program funds and staff positions at the county level according to the participant flow. In Woodbury County, DES funds for E&T cover an E&T interviewer and 50% time of a clerk servicing both E&T and JOBS.

The per-participant cost for the job club and individual job search components is roughly \$215 (this excludes administrative overhead).

I. FOOD STAMP EMPLOYMENT AND TRAINING PROGRAM PARTICIPATION REQUIREMENTS

Mandatory Participants and Exemption Categories

Individuals receiving Food Stamps are subject to Food Stamp work registration/E&T participation requirements unless they are exempt according to federal exemption criteria or exempt according to state categorical or individual exemption criteria.

In Iowa, DHS income maintenance caseworkers determine client eligibility for Food Stamps and identify mandatory nonexempt work registrants for E&T. Those who should be exempt from participation for a period of time (e.g., temporary medical problem) are not referred to Job Service until they are able to participate in program components.

Nonexempt mandatory work registrants are required to participate in a sequence of E&T services in the five participating counties. In the 94 categorically exempt counties, FS recipients interested in education or training services may volunteer for these services. These volunteers are referred directly to the education and JTPA agencies in the community by DHS income maintenance caseworkers.

In addition to the categorical exemptions above, DHS income maintenance caseworkers identify the following individual exemptions: strikers, individuals who are locked out of their place of employment, pregnant women in their second or third trimester, job attached, those whose mailing address is general delivery, battered spouses, accepted job, individuals participating in the Self-Employment Investment Demonstration project, those employed 60 or more hours per month, those whose daily commuting time exceeds 2 hours per day, and those with extended good cause. Extended good cause will be determined on a case-by-case basis; for example, an exemption may be granted when child care is totally unavailable.

Based on the 1991 Iowa state plan, the number of work registrants who are categorically exempt represents approximately 65% of the total number of

work registrants, and individual state exemptions represent approximately 10% of the work registrant pool. Thus, approximately 75% of the work registrant pool is exempt in Iowa.

Participant Volume and Extent of Participation by Volunteers

In the five counties offering E&T services, exempt individuals are not permitted to volunteer for the program. However, work registrants in the 94 categorically exempt counties can volunteer for education and training services available from other agencies through nonfinancial coordination linkages. Only Food Stamp recipients who would qualify as mandatory

nonexempt work registrants in a county operating E&T may volunteer for services in a categorically exempt county.

Some of the individuals reported by the state as E&T placements are identified through a statewide matching of data tapes of FSP work registrants and JTPA participants (excluding JOBS participants) already enrolled in JTPA. Data tape "matches" reported include JTPA mandatorics and JTPA volunteers. JTPA mandatorics are mandatory nonexempt work registrants in the state who have enrolled in JTPA services and JTPA volunteers are those exempt from E&T participation who have enrolled in JTPA services. In FY 90, volunteers identified through this data match represented 45% of the FS E&T component placements in Iowa.

Participation data for Woodbury County were not available. For the period October 1, 1990, through June 30, 1991, statewide figures including the JTPA match placements were as follows:

New Work Registrants	16,971
Work Registrants Exempted	12,008
Volunteers Who Began E&T Component	1,337
Mandatory Who Began E&T Component	3,239

Excluding those participants identified by the JTPA data tape match, the

Description of Sanctioning Procedures

The sanctioning process for mandatory nonexempt work registrants who miss the initial appointment without good cause does not begin until a second appointment letter is sent and the work registrant again fails to respond. For those mandatory nonexempt work registrants who have entered a component, the first step is a warning to the participant. This occurs when s/he fails to appear as scheduled (e.g., job club sessions) or when s/he is more than 30 minutes late in arriving for job club. The warning, when issued, takes the form of a notice of probation. Probation will turn into a notice of adverse action (NOAA), the second step, if another infraction occurs. Notices of adverse actions are issued by DHS on receiving a failure-to-comply notice from Job Services. The statewide number of work registrants issued NOAAs for the period October 1, 1990, through June 30, 1991, was 1,646.

Sanctionable violations are most likely to take place at the beginning of the FS E&T process. For example, absences without good cause from two scheduled orientation sessions or no show for job club are the typical infractions for which clients are sanctioned.

Job Service workers are responsible for "curing" participants who have failed to comply with program requirements. Mandatory nonexempt work registrants who failed to show for orientation are "cured" when they attend orientation. Participants who were sanctioned for noncooperation with job club are cured once the client completes 1 day of job club.

II. CLIENT TARGETING POLICIES AND CLIENT FLOW SEQUENCE

Client Targeting Policies

Iowa's E&T program has no client targeting priorities within the mandatory nonexempt work registrant population. State policymakers do not feel that they have the resources to target specific groups when the federal government requires a 50% participation rate.

A de facto targeting policy is implied by concentrating program resources on the five most populous counties. This decision was made because of limited funding, the difficulty experienced in operating the program in sparsely populated areas, and the cost effectiveness of operating more intensive services in areas with higher numbers of mandatory nonexempt work registrants. Essentially, the inability of the state to successfully operate the program in counties with low numbers of work registrants was the driving force of the current service design. Nevertheless, Iowa attempts to meet the educational needs of those who would benefit from these services by allowing participants the option of selecting education as an initial program component.

Client Flow and Service Sequencing

Exhibit 4-1 details the client flow through Iowa's E&T program. The process is the same for all five participating counties. Step 1 is work registration, which actually occurs at DHS before the client is referred to Job Service. Step 2 begins with the referral of the client to the Job Service office. After referral, clients may choose to participate either in job club or education components (Step 3). Individual job search and/or JTPA activities constitute Step 4 for those who remain unemployed and are still receiving Food Stamps after completing Step 3.

Individuals who complete job club and individual job search have met their participation requirements for the year, and are not subject to additional work requirements until they are recertified for Food Stamps 12 months later. Participants who complete job club and JTPA also fulfill their E&T obligations for the year. Since mandatory participants in need of and interested in educational services participate in this component for a minimum of 2 months, completion of this component fulfills their E&T program requirement. E&T cases are closed when individuals are sanctioned, employed, complete the program for the year, or leave the FSP case load for any reason.

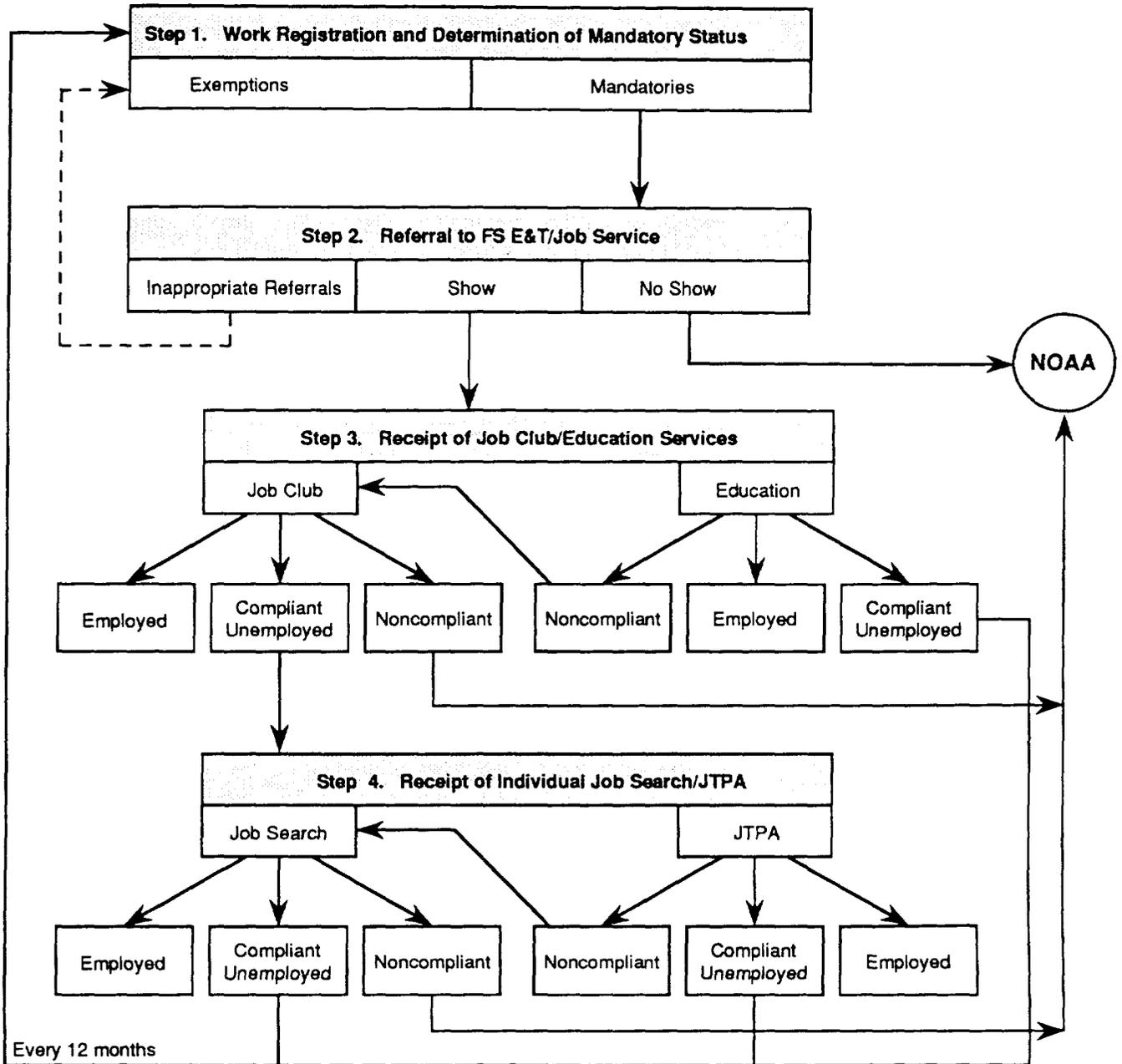


EXHIBIT 4-1 CLIENT FLOW: WOODBURY COUNTY, IOWA

III. E&T SERVICE COMPONENTS

Services Required for Some or All Work Registrants

All mandatory nonexempt work registrants must attend a Job Service orientation session where their rights and responsibilities are explained. Information about other services available is also provided. Clients interested in educational services (ABE, GED, ESL) and in need of these services may enroll in educational services offered through referral to community education providers. All others are instructed to report to job club operated by Job Service. Job club includes 1 week of instruction in job-seeking skills (e.g., interviewing, resume preparation, and use of the telephone to contact employers) followed by 3 weeks of supervised telephone contacts to an estimated 150 employers. For those who complete the 4-week job club and have not found employment, a second component must be undertaken: either 4 weeks of independent job search monitored by Job Service staff or participation in the local JTPA program.

Additional Services That Can Be Requested by Mandatory Registrants or Volunteers

Work registrants from geographically exempt counties may volunteer for education services or JTPA. Mandatory participants in the five counties offering job club, education, and independent job search may choose to enroll in JTPA services after completing the job club component instead of entering the 4-week independent job search. While E&T participants who select this option cannot be sanctioned for failure to participate in JTPA, they will be required to participate in independent job search if they do not follow through on the JTPA referral.

IV. HOW COORDINATION/CONSOLIDATION AFFECTS THE OPERATION OF THE FOOD STAMP E&T PROGRAM

At the state level, the administration of the E&T program is organizationally located in the Economic Assistance Division, Food Stamps Bureau. Administration of the JOBS program is located in the Economic Assistance Division, AFDC bureau. Thus, distinct units within this division oversee JOBS and E&T.

DHS contracts with the Department of Employment Services for the provision of E&T services statewide (\$470,000 for FY 91). DHS also contracts with DES for the provision of job club for PROMISE JOBS clients. Although this offers an opportunity for consolidated delivery of services to JOBS and E&T clients, services to the two client groups are usually distinct.

For example, in Woodbury County's Job Service office, E&T and JOBS staff are technically located in distinct units, although the local Job Service director hopes to integrate the units in the near future. In practical terms, however, the Woodbury County E&T and JOBS staff are physically located in the same section of the local Job Service office, and have taken advantage of this de facto colocation to operate a consolidated job club that serves both Food Stamp and AFDC clients.

Financial Coordination Linkages

The primary financial coordination linkage is between DHS and its contractor DES through the local Job Service system. DHS has essentially delegated all operational responsibility for E&T services to the state employment service. With respect to communication between the two agencies, there are occasional delays in getting information updated, explained perhaps by the need to communicate not only between two agencies, but also two levels of government (state and local). The relatively small size of the local operations in Sioux City facilitates informal communications between and among local providers.

Nonfinancial Coordination Linkages

At one time, there was an attempt to formalize interagency coordination between local service providers by using the county General Assistance program as the central hub. The experiment only lasted 18 months because of the difficulties of coordinating with numerous agencies. Whatever duplication of services existed before the coordination plan remain today.

While no formal coordination agreements have been established between E&T and the JTPA program, the informal local procedures implemented in Woodbury County appear to be working quite well. In addition, nonfinancial referral arrangements with local educational institutions permit E&T participants to receive E&T "credit" for ABE, GED, and ESL classes attended in the local community. During the site visit, it became apparent that local agencies know of each other and their services.

**FOOD STAMP EMPLOYMENT AND TRAINING PROGRAM DESCRIPTIVE PROFILE
CADDO PARISH, LOUISIANA**

Case Study Site: Caddo Parish, Louisiana.

Name of Program: Louisiana Job Employment Training Program.

The Louisiana Food Stamp Employment and Training program is a state-administered program for Food Stamp recipients who are not receiving any other forms of public assistance. Mandatory work registrants in 22 parishes are served; clients from all 39 other parishes are categorically exempt from FS E&T requirements. AFDC recipients participate in a different employment and training program called Project Independence, the state name for JOBS. There is no general assistance program in the state.

State Agency Responsible for the E&T Program

Louisiana Department of Social Services, Office of Family Support, Assistance Payments/Food Stamp Programs (DSS). Program operations are contracted by the state to the Louisiana Department of Employment and Training (in 15 parishes) and to local governing authorities (in 7 parishes).

Local Agency Responsible for the E&T Program

City of Shreveport, Department of Human Resources Development.

State Versus Local FSA Roles and Responsibilities

The E&T¹ program in Louisiana is state-administered. The state Department of Social Services determines the content and sequence of E&T

¹ The Food Stamp Employment and Training program in Louisiana will be referred to as "E&T" throughout this descriptive profile.

components, client referral and sanctioning policies, and the roster of parishes that will be served. The E&T program is organizationally located in the Assistance Payments/Food Stamp Programs division of the Office of Family Support within DSS.

State E&T staff in regional DSS offices supervise the operation of full E&T units by designated local service providers in 6 parishes, and a seventh parish that operates a single E&T training component, while the Louisiana Department of Employment and Training (LDET) operates and oversees less comprehensive E&T job search programs in 15 additional parishes, under contract with DSS.

Caseworkers at the local DSS office determine the work registration status of Food Stamp applicants. Names and addresses of mandatory work registrants are transmitted by way of a weekly computer list to the designated local service provider in participating parishes for program placement. Providers transmit information back to DSS about client compliance and noncompliance. Local DSS offices are responsible for sanctioning noncompliant cases.

Location of Program Responsibility Within Local FSA

In Caddo Parish, the E&T program is operated as a self-contained program of the City of Shreveport, Department of Human Resources Development under a contract with the state DSS.

Types of Service Providers Used

The City of Shreveport, Department of Human Resources Development is the sole service provider for E&T in Caddo Parish. Limited referrals are made to JTPA which is operated as a separate unit in the same city department.

State and Federal Funding

Louisiana's E&T budget for FY 1991 totaled \$3,839,416. Federal formula funds made up 87% of this total (\$3,353,828); state funds were used to match transportation and dependent care costs only, and came to \$485,588. FY 1991 funding increased 8.9% (\$393,694) from the FY 1990 total.

Caddo Parish receives \$510,920 for E&T, \$104,280 of which is for participant reimbursements. The local E&T budget pays for 13 staff members (coordinator, counselor, job developers, instructors, and clerks), related personnel costs, operating expenses, and training materials.

For Louisiana as a whole, the cost per service placement for each component as estimated in the state plan follows:

Job Search Training with Employer Contacts (Component A)	\$47
Independent Job Search (Component B)	45
JTPA (Component C)	60

I. FOOD STAMP EMPLOYMENT AND TRAINING PARTICIPATION REQUIREMENTS

Mandatory Participants and Exemption Categories

Thirty-nine (39) parishes are categorically exempt from E&T requirements due to geographic remoteness. In parishes where Food Stamp recipients are not geographically exempt, DSS caseworkers determine client eligibility for Food Stamps and assign a work registration code. These codes capture information on client status (e.g., first time referral; re-referral) and applicable federal exemptions to the work registration requirement.

There are two sets of individual exemption categories. The first set is assigned by caseworkers at DSS in accordance with allowable federal exemptions. These exemptions include: working 30 or more hours per week, under age 18 or over age 59, disabled, caretaker of a child under 6 years old, enrolled in a rehabilitation program for drug or alcohol abuse, receiving

unemployment compensation, enrolled in Project Independence (JOBS) or another employment and training program. The state plan also exempts strikers and SSI exempt individuals. These exemptions preclude the client from being referred to E&T as a mandatory work registrant, although it is possible to receive services as a volunteer.

A second set of state-initiated exemptions, called "barriers to participation," is determined by E&T staff after clients are referred for services. The barriers include: physical or mental disability, lack of child care, lack of transportation, remoteness from job sites or E&T office. These exemptions are used for mandatory work registrants who can show good cause for not being able to participate in E&T for 60 days or more. Short-term good cause barriers can also be assigned to cover the following situations: short-term transportation problems, short-term child care problems, caring for someone with a temporary illness, being out of town for less than a month.

The state plan for FY 1991 includes the following estimates for E&T exemptions.

Number of mandatory work registrants categorically exempt from E&T requirements (39 geographically remote parishes)	60,114
Number exempt due to physical/mental disability	5,300
Number exempt due to dependent care barrier	1,376
Number exempt due to transportation barrier	1,824
Number exempt due to remoteness	464

Overall, 42% of Louisiana's work registrant population is exempt from the E&T program.

Participant Volume and Extent of Participation by Volunteers

Statewide service placement figures are drawn from the FY 1991 state plan, and are anticipated participation rates.

Number of mandatory work registrants who will enter component	52,300
Volunteers	5,000
NOAAs	28,642

Limited information is available for Caddo Parish. As of July 30, 1990, there were 4,958 mandatory work registrants in the parish. Excluding those registrants in categorically exempt parishes, Caddo has 5.3% of the state's mandatory work registrants, and is the second largest parish (behind Orleans) in terms of its mandatory work registrant population. A review of recent monthly reports indicated the following cumulative figures for June, July, and August of 1991.

Number of new referrals	1,153
re-referrals	655
referred to JTPA	43
NOAAs	857

Description of Sanctioning Procedures

Mandatory work registrants have two chances to comply with E&T program requirements. When a client fails to appear for orientation without good cause, or does not comply with component requirements, s/he is sent a warning and given an opportunity to reschedule. If the client does not respond, or fails to comply for a second time, E&T workers notify DSS. DSS workers, in turn, issue a NOAA which notifies the client about the pending sanction.

The majority of noncompliance cases result from individuals who never appear at all for E&T orientation and service placement. A large number of sanctions also result from people who fail to appear for their required exit interview after completion of the job search. According to state documents, slightly more than one half of the Food Stamp E&T caseload is sanctioned each year. Caddo Parish administrators estimate a lower noncompliance rate of approximately 30%. The statewide average appears to be driven up by higher noncompliance rates in parishes where the Louisiana Department of Employment and Training operates the E&T job search component.

II. CLIENT TARGETING POLICIES AND CLIENT FLOW SEQUENCE

Client Targeting Policies

There are no formal client targeting priorities in Caddo Parish. Local administrators expressed concern that some employment barriers (e.g., illiteracy) are not adequately captured by the DSS exemption categories. E&T intake procedures are designed to focus on clients who are likely to benefit from job search training as opposed to those who need additional skills before they are job ready.

Louisiana's decision to exempt mandatory work registrants in 39 parishes also represents an implied targeting decision to bring comprehensive E&T services to more populated parishes, where numbers of both work registrants and employment opportunities are greater. E&T services to volunteers are limited. Exempt Food Stamp recipients may volunteer for JTPA or for the E&T program.

Client Flow and Service Sequencing

Exhibit 5-1 details the client flow through the Caddo Parish E&T program. This description is representative of the six parishes that operate full E&T units. Step 1 is the work registration step which occurs at DSS. Step 2 is the referral to the E&T provider for orientation. After referral to E&T, clients are placed in service components based on the results of math and reading tests administered during orientation and on what components, if any, the client has completed in the past.

Three E&T components constitute Step 3. Clients are required to complete one service component per year. Clients with literacy barriers are referred to JTPA (Component C) for basic skills training. All other first time referrals enter the job search training component (Component A). Those who have completed job search training during a previous E&T placement begin an independent job search (Component B). Program compliance and client progress are monitored by means of an exit interview within one month after E&T enrollment.

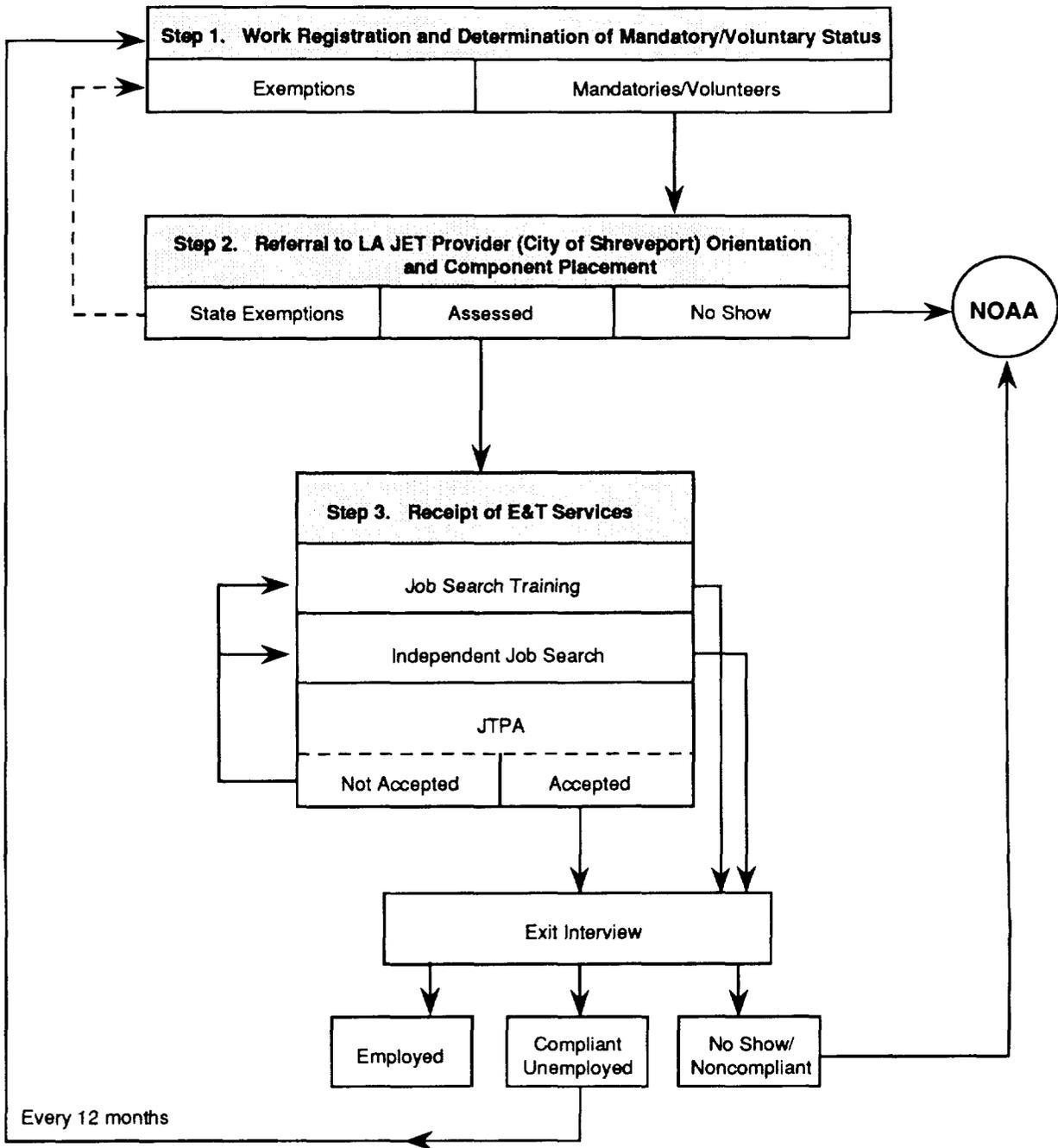


EXHIBIT 5-1 CLIENT FLOW: CADDO PARISH, LOUISIANA

III. E&T SERVICE COMPONENTS

Services Required for Some or All Work Registrants

All mandatory work registrants are required to appear at an E&T orientation session where their rights and responsibilities are explained. Information about program components is also presented and skill assessments are performed. Job search training (Component A) consists of two days of classroom instruction on employability skills and requires clients to contact 15 employers in person about possible jobs. Independent job search (Component B) requires clients to make 18 employer contacts. Re-referrals who have completed job search training in the past are typically assigned to Component B. A client is referred to JTPA (Component C) if a need for basic skills training is indicated. All clients are required to report back to E&T for an exit interview within three weeks of program entry, no matter what component they enter. Employer contacts are verified during or immediately after the exit interview.

Exempt clients and clients who have completed their required component can volunteer for JTPA in Caddo Parish, but are not assured of being enrolled because of limited JTPA funding.

Clients are reimbursed for transportation expenses for attending orientation, on a per-contact basis for job search activities, and for appearing at their exit interview. The transportation allowance is given after the component is completed, and clients are eligible for only one allowance per 12-month period, at a maximum of \$25.00. Clients who need child care assistance are eligible for up to \$160.00 per child per 12-month period. (There is no provision for more than one component, one transportation allowance, or one day care allowance per 12-month work registration period.)

Additional Services That Can Be Requested by Mandatory Registrants or Volunteers

No additional services are available, but clients are encouraged to voluntarily pursue employment and training activities for which they might be eligible (e.g., JTPA, local vocational schools). Also, clients can volunteer for additional components, but they will not be reimbursed for transportation expenses while participating in additional components.

IV. HOW COORDINATION/CONSOLIDATION AFFECTS THE OPERATION OF THE FOOD STAMP E&T PROGRAM

Consolidation Linkages

The Food Stamp E&T program is administered by the Louisiana Department of Social Services, Office of Family Support, Assistance Payments/Food Stamp Programs. The Office of Family Support also administers Project Independence (JOBS) for AFDC clients. While there is administrative consolidation at the state level, this appears to have no effect on coordination of service delivery. Project Independence and E&T have no overlap whatsoever in the field.

In Caddo Parish, the City of Shreveport, Department of Human Resources Development is responsible for both Food Stamp E&T and JTPA services. However, the collocation of these programs within the same city agency has limited effect on clients; JTPA referrals for E&T participants occur infrequently.

Service Coordination Linkages

At the state level, DSS contracts with the Louisiana Department of Employment and Training for the provision of the E&T job search program in 15 parishes. In 6 additional parishes operating full LaJET units (e.g., Caddo Parish) and in the single parish that operates job search training without

employer contacts only, contracts are established with local governing authorities. In each of these situations, the E&T funding is used to operate a separate, self-contained program for Food Stamp work registrants.

Communication between DSS and its contracted service providers appears to work well in Louisiana as a whole and in Caddo Parish in particular. There are only occasional problems with inappropriate referrals or delays in processing information. Some of these problems are due to a mix of computerized and "hard copy" reporting.

Overall, there is limited service coordination between the Food Stamp E&T program and other employment and training programs in Caddo Parish. This is partly due to the fact that E&T is run as a self-contained program for Food Stamp work registrants.

**FOOD STAMP EMPLOYMENT AND TRAINING PROGRAM DESCRIPTIVE PROFILE
WAYNE COUNTY, MICHIGAN**

Case Study Site: Wayne County, Michigan.

Name of Program: Michigan Opportunity and Skills Training (MOST).

This is a consolidated statewide employment and training program for public assistance recipients in Michigan. It is funded under both the federal Food Stamp Employment and Training program and the federal JOBS program for AFDC recipients. It has received considerable state funding since its inception in 1984 but is currently under review by the state administration due to the state budget crisis. One of the criteria for which Wayne County was selected as a site in this study was the presence of a General Assistance program. At the time of the site visit in October, 1991, the General Assistance program in Michigan had just been eliminated by the state legislature. It was unclear to state and local program administrators how state policy makers may alter state funding for Food Stamp recipients served under the MOST program. Thus, the profile that follows should be interpreted as a description of the program during FY 91 only. It does not attempt to surmise what the nature of prospective changes to the MOST program may be or what impact elimination of the GA program may have on the FS E&T budget or service design.

State Agency Responsible for the E&T Program

Michigan Department of Social Services, Family Services Administration,
Child and Family Services, Bureau of Adult Employment Services.

¹ The Food Stamp E&T program in Michigan will be referred to as E&T throughout this descriptive profile.

Local Agency Responsible for the E&T Program

Michigan Department of Social Services, Wayne County General Services Administration.

State and Local Roles and Responsibilities

The MOST program is state-administered, with local program operations administered and staffed by state employees working in Wayne County's central administrative offices and 27 local district offices. The Bureau of Employment and Training is responsible for planning and directing the employment and training programs under the auspices of Social Services. This includes all the programs consolidated under the MOST program such as JOBS, Food Stamp E&T, and Job Start, a state-initiated program for GA recipients between the ages of 18 and 25. Staff at the Bureau prepare the annual plan for E&T, maintain contact with the regional FNS office, prepare the quarterly and annual reports and oversee the collection of data. State

Location of Program Responsibility Within Local FSA

The central administrative offices of the General Services Administration in Wayne County are responsible for production of the local MOST plan and contract administration with locally selected service providers. Cash assistance and work registration is performed by assistance payments workers located in each of the 27 district offices. MOST services workers are also located in the district offices but work in a separate unit from assistance payments workers.

Each district office has a branch manager who reports to one of three zone managers in Wayne County. The zone managers report to the county director of the General Services Administration. Management staff are involved in oversight of all DSS programs delivered through the district offices as well as the selection and oversight of service providers. The County Board of Supervisors reviews the selection of E&T service providers before the list is sent to the state for final approval.

Types of Service Providers Used

Services provided in-house by MOST services workers include assessment and EDP development, referral to other service components, delivery of the independent job search component, job development activity such as job fairs, and reporting noncompliance to the assistance payments workers. All other services are provided through financial contracts and nonfinancial referral linkages with other agencies.

Wayne County had 14 service provider contracts for FY 91, 13 of which were for the delivery of vocational training and job development/job placement services, and one of which was for testing, evaluation, and job readiness. Service providers under financial contract included two community colleges, several proprietary schools, and community-based organizations. The total amount spent on contracts for FY 91 was \$461,428 with 414 clients served.

Service providers used under nonfinancial agreements include the Detroit and Highland Park public school districts, the Michigan Employment Security Commission (MESCC), Michigan Rehabilitation Services, and JTPA. Of these, the public school districts are the major providers with quite extensive resources for secondary and vocational education, and job development/job placement services. Services to MOST participants in these programs are funded through the existing agency budgets.

State and Federal Funding

The statewide portion of the MOST budget allocated from E&T sources for FY 91 totaled \$27 million out of a total budget of \$86 million for employment and training. Federal E&T formula funds accounted for \$3.4 million, and 50% federal/50% state funds totaled another \$22 million. There was an additional \$1.8 million for supportive services funded under federal/state cost sharing. Overall, the state provided \$12 million, or 45% of the total state budget for E&T. The estimated cost of a placement into a component ranged from \$201 to \$304.

I. FOOD STAMP EMPLOYMENT AND TRAINING PARTICIPATION REQUIREMENTS

Mandatory Participants and Exemption Categories

The MOST program operates in all of Michigan's 83 counties so there is no geographical exemption to the program. Individual exemptions from MOST are allowed under the following categories:

- A parent of three or more children under 10 years of age, during hours in which the parent is required to be in the home to care for the minors.
- A person who was, within the past five years, a resident of a mental institution, or is presently using a prescribed medication to control a condition of mental illness. Such a person may volunteer for MOST if that person has a treatment plan that calls for employment and training services.

- A person currently undergoing substance abuse treatment. This condition shall only apply for one year in the lifetime of each recipient. The person must be enrolled in a treatment program for 15 or more hours per week to be excused.

Additional individual exemptions specifically for Food Stamp work registrants are allowed for:

- Pregnant women beginning with the sixth month of pregnancy.
- A person who is permanently or temporarily unfit for employment due to physical or mental illness or injury, including complication of pregnancy.
- A person who is a regular participant in a substance abuse treatment and rehabilitation program. (Thus the Food Stamp work registration exemption is slightly broader than the general exemption for other MOST participants.)

Participant Volume and Extent of Participation by Volunteers

The Wayne County caseload comprises 28.2% of the state MOST total. In September 1991, Wayne County had about 6,500 FS E&T active cases out of 17,400 cases open to MOST. Thus FS E&T participants made up approximately 40% of the MOST active caseload in Wayne County and statewide. Approximately 93% of the FS E&T participants in MOST receive GA/FS and 7% received only Food Stamps. Participation by volunteers is limited. This pattern results from state policies targeting GA recipients within the FS E&T work registrant population as described in the next section.

Description of Sanctioning Procedures

The sanctioning process is considered a two-part process in MOST. The first part is the closing of the MOST services case. The MOST worker does this immediately upon identifying a case of noncompliance. Since MOST workers handle the payments for supportive services, this closing has an immediate effect on the client. The MOST worker then turns in two forms of case action notices to the supervisor who keeps a log of the sanctioning activity. The notices of case action are then referred to the assistance

payments worker, who must act within three days of receipt by sending the client a NOAA. Food Stamp-Only participants must be given an opportunity to reduce the two-month disqualification by demonstrating a willingness to comply. If a person states a willingness to comply, the MOST worker must arrange a five-working-day assignment within seven calendar days to test the client's willingness to comply. If he or she completes the assignment, he or she is instructed to reapply with the assistance payments worker. The MOST worker also makes a written request to the assistance payments worker to end the Food Stamps disqualification.

II. CLIENT TARGETING POLICIES AND CLIENT FLOW SEQUENCE

Client Targeting Policies

The priority groups for the MOST program are heavily influenced by the JOBS targeting criteria. In addition, the program targeted several groups of GA recipients. The priority target groups include:

- Families who have received AFDC for any 36 months of the preceding 60 months, or applicants for AFDC who have received such aid for any 36 of the 60 months immediately preceding the most recent month for which application was made.
- AFDC families in which a custodial parent is under age 24 and has not completed high school, is not currently enrolled in high school, or an equivalent course, or who had little or no work experience in the preceding year.
- AFDC families in which the youngest child is within two years of being ineligible for AFDC because of age.
- Employable GA applicants and recipients 18 through 25 years of age.
- Employable individuals from GA families.
- Exempt and nonexempt volunteers.

One program under MOST that targets the E&T mandatory nonexempt work registrant population in particular is Job Start. This was implemented in FY 89 as a special demonstration program for 18 to 25 year old GA recipients (85% of whom are estimated to be receiving Food Stamps). This population is

targeted on the theory that serving them early in adult life can prevent long term welfare dependency.

Client Flow and Service Sequencing

The MOST client targeting policy and service delivery system is based on an assumption that not all mandatory nonexempt work registrants will be served. MOST caseworkers open cases for individuals who are likely to benefit from services as well as those receiving substantial cash assistance payments.

The most notable feature of the client flow in Wayne County is that it is individualized on the basis of the Employability Development Plan (EDP) session. Michigan is one of only two states in the nation to have received FNS approval for treating EDP as a service component. The EDP is the only component in which all active clients participate. Criteria for assigning clients to a component following the EDP are set out in the MOST services manual. For example, MOST workers are directed to consider assignment to job club/job search activities for clients with college degrees or recent labor market connection. High school completion or GED preparation is considered the appropriate choice for those without a high school diploma, while job readiness or vocational training is the recommended choice for those without recent connection to the labor market or readily marketable job skills. The assignment criteria are based on the client's level of education and work experience. Those with education and work experience are expected to participate in job search activity, while those who lack education and work experience are assigned to a component that meets their greatest deficiency.

For participants who complete an education or training activity as their first component, MOST workers indicated that the second required service is usually job search activity. Exhibit 6-1 indicates the client flow sequence.

MOST cases are closed when the individual is employed, no longer in need of service, or determined to be in noncompliance without good cause. The

MOST worker must enter an appropriate closing code on the appropriate form, and submit it to the data entry unit for entry into the state central information system, (CIS).

Job Start supplements the usual components available through the MOST worker, by providing job coaches who work as case aides. The job coaches' caseloads are small, (around 50 clients compared with 150 for MOST workers) and they work more intensively with each client. Job coaches are very active in encouraging participation; for example, calling clients at home every morning if deemed necessary to get them to their class or job on time.

III. E&T SERVICE COMPONENTS

Although there isn't a high rate of exemptions in this program, not all mandatory nonexempt work registrants are chosen for active participation in MOST. Consequently, there are no service components that are mandatory for all nonexempt work registrants. However, orientation, assessment and employability development planning is the required first component for all active participants. Furthermore, active participants are required to participate in another of the components offered in the areas of employment seeking, education, or vocational training. Each of the service components available to E&T participants is briefly described below.

There is a comprehensive range of service components offered by the MOST program in Wayne County. General education is the most commonly assigned component in Wayne County and across the state, accounting for 22% and 20% of all placements respectively. This component includes remedial education, English as a second language, and high school completion or GED preparation.

Wayne County has most of the state's vocational training contracts under MOST because of the greater availability of training resources in the Detroit metropolitan area. Vocational education/training placements require full-time participation, career planning assistance, and curricula that are career- or trade-specific. Sixteen percent of all Wayne County placements

are in this category. In addition to vocational training, there is a separate component for post secondary education that covers individuals pursuing higher education with the assistance of other funding sources such as Pell grants or school financial aid. MOST staff may provide assistance in locating these funding sources. Once enrolled, participants must provide quarterly progress reports to their MOST worker. Six months prior to graduation participants in this component are also required to begin a job search. This component accounts for 7% of all E&T placements in Wayne County.

Employment seeking activity includes any one of three components--job club, individual job search, and job development and placement. Individual job search is used most often, accounting for 8% of overall placements in Wayne County. The job club, which accounts for 6% of placements, varies by service provider. At one provider visited, it was a five week course, four hours per day, covering basic job search skills such as resumes, job leads, and interviewing, as well as basic world of work skills like tax forms, benefits, and budgeting income.

The community work experience (CWEP) component provides up to six months of unpaid work experience to participants who lack a recent connection with the labor force. CWEP sites are community-based organizations or local government agencies. The focus of these placements is to provide exposure to the labor force rather than skills training in a specific occupation although this can be a by-product of the assignment. Eight percent of E&T clients enter this component in Wayne County.

The job readiness component is a more recent addition to MOST, and is targeted toward the harder to serve. This component focuses on attitudinal problems and tries to build self-confidence, a strong work ethic, and career goal setting. It requires at least 20 hours of structured activity per week for up to 12 months and can include budgeting, time management and parenting skills. This component is not frequently used in Wayne County (4% of all E&T placements) and was not offered at either of the district offices visited for this study.

Grant Diversion is the remaining component in the program in Wayne County. This is an on-the-job training component that accounted for only 1.4% of E&T placements in Wayne County. FS-only clients were not assigned to this component during FY 91. It remains a small part of the E&T budget because it requires 100% state funds and consequently its administration requires shifting funds between different programs. Its administration differs slightly from other MOST components in that program specialists in the central administrative offices, rather than the MOST workers, coordinate and administer the program. Staff receive job listings which they send to the district offices requesting referrals of qualified recipients. If selected for grant diversion, the participant's grant is frozen, and the county pays the employer 50% of the participant's wage. The program also maintains medical coverage and worker's compensation for the duration of the component. This component is considered full-time employment for the participant. The placement may not last more than six months and the employer payment is considered reimbursement for training costs. Welfare savings are realized through this program as participants are expected to remain fully employed.

While not a separate component, Job Start is a demonstration program in six counties including Wayne. It is designed to replace GA benefits for 18-25 year olds with education and training activities supported by training stipends. Components are the same as for other MOST participants. However, MOST workers in Job Start are assisted by job coaches who can work more intensively with clients because of smaller caseloads of around 50. This program was in the process of being eliminated in October, 1991 along with the GA program. The MOST workers were continuing to work with former GA clients of all ages, who are now Food Stamp only cases.

Supportive services available to E&T registrants under MOST include child care payment and transportation reimbursement during E&T participation. The transportation allowance is 12 cents per mile. The first \$25 is funded by the FSET budget, and above that is funded by state funds. In Wayne County, staff estimated that \$44 per month is the minimum required for transportation.

IV. VOLUNTARY SERVICE COMPONENTS

Volunteers may be placed in any of the service components offered under MOST. Staff indicated that they usually encourage voluntary participation for individuals who are already participating in an educational activity so they can take advantage of the supportive services provided by MOST.

V. HOW COORDINATION/CONSOLIDATION AFFECTS THE OPERATION OF THE FOOD STAMP E&T PROGRAM

Until October 1991, the MOST program remained a consolidated employment and training program for recipients of AFDC, GA and Food Stamps. The advantage to this for the E&T mandatory nonexempt work registrant population is that the state legislature has consistently devoted substantial state funds to the MOST program since its inception in 1984. As a result, participants have access to a more generous level of supportive services, a broader range of service choices, and a relatively intensive level of services.

In addition to the consolidation that occurs at the state level with federal and state employment and training programs under the direction of the Department of Social Services, financial and nonfinancial coordination also occurs at the local level with other providers of education, vocational training, and employment seeking services. For FY 91, Wayne County had contracts totaling \$461,428 with a variety of service providers including public and proprietary education and vocational training institutes, and community-based organizations. Some assessment and job readiness services were also provided under contract. Nonfinancial agreements also constitute a significant part of service coordination in Wayne County. The Detroit and Highland Park Public School districts contribute a range of education and training services including assessment, remedial education, high school completion and GED preparation, vocational training, job club, and job development/placement services. Other local service providers that are part

of the local referral network include JTPA, the Michigan Rehabilitation Service, and the Michigan Employment Security Commission.

A significant factor in the smoothness of coordination with service providers for MOST in Wayne County is the continuation of the CORE group, a concept initiated under the previous administration by the Governor's Office of Job Training. The idea was for providers of education and training services in each county to meet on a regular basis with the objectives of developing common assessment practices, reducing duplication of services, and eliminating obstacles to clients receiving the broadest array of services available to them through the public and nonprofit sector. This practice has proven so effective in eliminating turf issues among different agencies and facilitating better service delivery to clients, that members of the group are continuing to meet in Wayne County, although this is no longer a state requirement.

**FOOD STAMP EMPLOYMENT AND TRAINING PROGRAM DESCRIPTIVE PROFILE
HINDS COUNTY, MISSISSIPPI**

Case Study Site: Hinds County, Mississippi.

Name of Program: Food Stamp Employment and Training Program.

This Food Stamp Employment and Training (E&T)¹ program is a state-administered program for Food Stamp recipients who are not receiving AFDC benefits or are in a county in which the JOBS program for AFDC recipients is not yet operational. The E&T program is a full-service work program in 25 of the 82 counties in Mississippi. There are satellite offices in an additional seven counties that offer the independent job search component, referrals to GED and ABE providers, and referral to JTPA.

State Agency Responsible for the E&T Program

Mississippi Department of Human Services, Division of Economic Assistance, Food Stamp Employment and Training Program.

Local Agency Responsible for the E&T Program

Mississippi Department of Human Services, Food Stamp Employment and Training Office.

State and Local Roles and Responsibilities

The Food Stamp Employment and Training program is state administered. The state branch director for E&T is responsible for producing the state plan, monitoring the budget, and directing policy at the local level through the regional supervisors.

¹ In this document the Food Stamp Employment and Training program will be referred to as "E&T."

There are four regional supervisors of the program in the state of Mississippi. At the local level, the regional supervisor for the Hinds County program is located on-site at one of two E&T offices in Jackson. The offices and the program itself are administered separately from the local benefit offices of the Department of Human Services and from other employment and training programs in the area.

Location of Program Responsibility Within Local FSA

Eligibility workers in the Department of Human Services are responsible for the administration of the cash assistance portion of the program as well as for the determination of mandatory registrants, referral to the E&T program, and administration of sanctions for E&T.

The Food Stamp Employment and Training program staff are responsible for E&T services including an orientation/assessment session, the development of service plans, the delivery of the job search training component, independent job search, referral and coordination with other service providers, the tracking of client progress, and reporting noncompliance to the county eligibility workers.

Types of Service Providers Used

The job search training and independent job search components are operated in-house by E&T staff. Other services are provided through nonfinancial agreements with local education institutions and the local JTPA system. The workfare component involves local work sites that include nonprofit organizations and government agencies.

State and Federal Funding

The statewide budget for the E&T program in FY 1991 was \$2.4 million. Of that total, federal formula funds accounted for approximately \$1.8 million, and 50% federal/50% state funds totaled another \$318,000. Another \$300,000 for supportive services that was also split between federal and

state funds. Overall, federal funding accounted for over 87% of the funds available to the program.

I. FOOD STAMP EMPLOYMENT AND TRAINING PROGRAM PARTICIPATION REQUIREMENTS

Mandatory Participants and Exemption Categories

Individuals receiving Food Stamps are subject to Food Stamp work registration/E&T participation requirements unless they are exempt according to federal exemption criteria or exempt according to state categorical or individual exemption criteria. In Mississippi, there is a categorical exemption for Food Stamp recipients in 50 of the 82 counties. Of the 32 counties operating one or more components of the E&T program, 7 counties have an operational JOBS program for AFDC recipients. AFDC recipients receiving Food Stamps are exempt from E&T participation in those counties but are expected to participate in E&T in the remaining 25 counties.

In addition to the categorical and federal exemptions, there are four state-initiated individual exemption categories:

- (1) Job-attached (on strike, or expected to return to work).
- (2) Non-English speaking. (The Gulf region of the state has many Vietnamese and consequently has ESL classes available as a component. This is not the case in Hinds County.)
- (3) Second and third trimester of pregnancy.
- (4) Lacking transportation, defined as living more than 1 hour by public transportation from an E&T office. The transportation exemption is also granted to those whose only income is Food Stamps.

These individuals would not have transportation money for expenses associated with their first month of participation since the travel expense allowance is paid retroactively. There is a relatively low rate of individual exemptions in Hinds County. Through June 30, 1991, 226 individual

exemptions were granted, roughly 9% of work registrants. The most frequent individual exemption was for lack of transportation.

Eligibility workers at the Department of Human Services benefit offices are responsible for determining mandatory work status. Because large caseloads prevent eligibility workers from conducting thorough intake interviews at times, E&T workers refer participants back to the eligibility unit if they believe a federal exemption was not previously identified.

Participant Volume and Extent of Participation by Volunteers

As of June 30, 1991, the E&T program in Hinds County had received 2,399 referrals for FY 91. There was only one volunteer for the program in Hinds County for this program year. Because of a high rate of noncompliance, only 755 placements had been made into a service component.

Description of Sanctioning Procedures

E&T staff send out two appointment letters requesting clients to come in for an assessment. The letters reiterate that participation is required. If there is no response, a notice of noncompliance is sent to the eligibility worker. On receiving the notice of noncompliance, the eligibility worker sends the client a notice of adverse action (NOAA). This document informs the client that he/she has 10 days to respond. If no response is made, Food Stamp benefits are cut for 2 months or until the client complies with program requirements.

Within the 10-day period before sanctions are applied, a client may cure noncompliance by complying with program requirements. Sanctioned clients must reapply for Food Stamps after their sanction period expires and are referred to E&T again, as if they were new registrants.

Of the 2,046 cases deregistered as of July 31, 1991, 58% were deregistered for noncompliance.

II. CLIENT TARGETING POLICIES AND CLIENT FLOW SEQUENCE

Client Targeting Policies

In Hinds County, there is no specific client targeting beyond the exemption categories. All mandatory nonexempt registrants must participate or be sanctioned.

Client Flow and Service Sequencing

E&T participants in Mississippi are required to participate in several service components. After the initial orientation session, the first required component for most participants is job search training. The job search training component includes an independent job search after a group job search training workshop. There are two exceptions to assigning clients to job search training as the first component. The first exception is made for those for whom the group job search training is not available or would represent a hardship. Those who live in one of the seven satellite counties have only independent job search offered directly by the E&T program, so that

JTPA, but both components are provided to only a fraction of all E&T enrollees.

III. E&T SERVICE COMPONENTS

The E&T service components include job search training, independent job search, workfare, adult basic education, GED preparation, and JTPA.

Services Required for Some or All Work Registrants

Mandatory work registrants are required to participate in a component as directed by the E&T social worker. Education is encouraged as the first component for participants who lack their GED or basic skills. The first component for most registrants in full-service counties is 6 hours of job search training, followed by 1 month of required job search with 25 documented contacts. Recipients who live far from an E&T office, but do not qualify for a transportation exemption, are not required to attend the job search training classes. They are assigned to independent job search as their first component.

The remaining E&T components for those who complete job search training or independent job search are vocational training through referral to the JTPA service system, or workfare through a job assignment to a public or nonprofit agency. There is no apparent repetition of components because few participants are still in the program at the time their second component is scheduled to conclude. Most participants have been sanctioned or have left the Food Stamp rolls for other reasons by that time.

A transportation allowance of \$25 per month is paid at the end of each month of participation to all participants who cooperate with program requirements. Staff have calculated that the budget is sufficient for participants to average seven transportation payments per year. There is also a \$160 per month allowance for child care but this is rarely used in Hinds County. E&T participation does not usually require attendance outside

of school hours for parents of children over six. There is an informal postponement of participation from the program during the summer for parents with children over six who need child care.

Additional Services That Can Be Requested by Mandatory Registrants or Volunteers

There are no additional services for mandatory nonexempt work registrants. Volunteers may participate in any or all of the components, but there was only one volunteer in Hinds County during the first 7 months of 1991.

IV. HOW COORDINATION/CONSOLIDATION AFFECTS THE OPERATION OF THE FOOD STAMP E&T PROGRAM

Consolidation Linkages

In this program, consolidation is an issue for the future that has been discussed by state staff. With the JOBS program less than a year old in Mississippi, there has been little opportunity for consolidation so far. There has been some talk of E&T staff providing the job search training component to JOBS participants as well as E&T participants, under contract to JOBS, but this has been at the level of informal discussions with state administrators of the program.

Service Coordination Linkages

Providers of education, training, and workfare services to E&T participants include local community colleges, nonprofit agencies, other government agencies, and JTPA. Service providers assist E&T staff in monitoring clients' participation by submitting time and attendance records to the local E&T office. In Hinds County, nonfinancial coordination linkages resulted in 32 individuals being served in the GED component, 1 in the ABE component, and 12 in the JTPA component during the first 9 months of FY 91.

There were 33 placements in the workfare component, which resulted from individual public or nonprofit agencies agreeing to provide supervision and job training, and to pay \$12.50 per month to the state for the duration of the workfare placement as a contribution to the participant's transportation allowance.

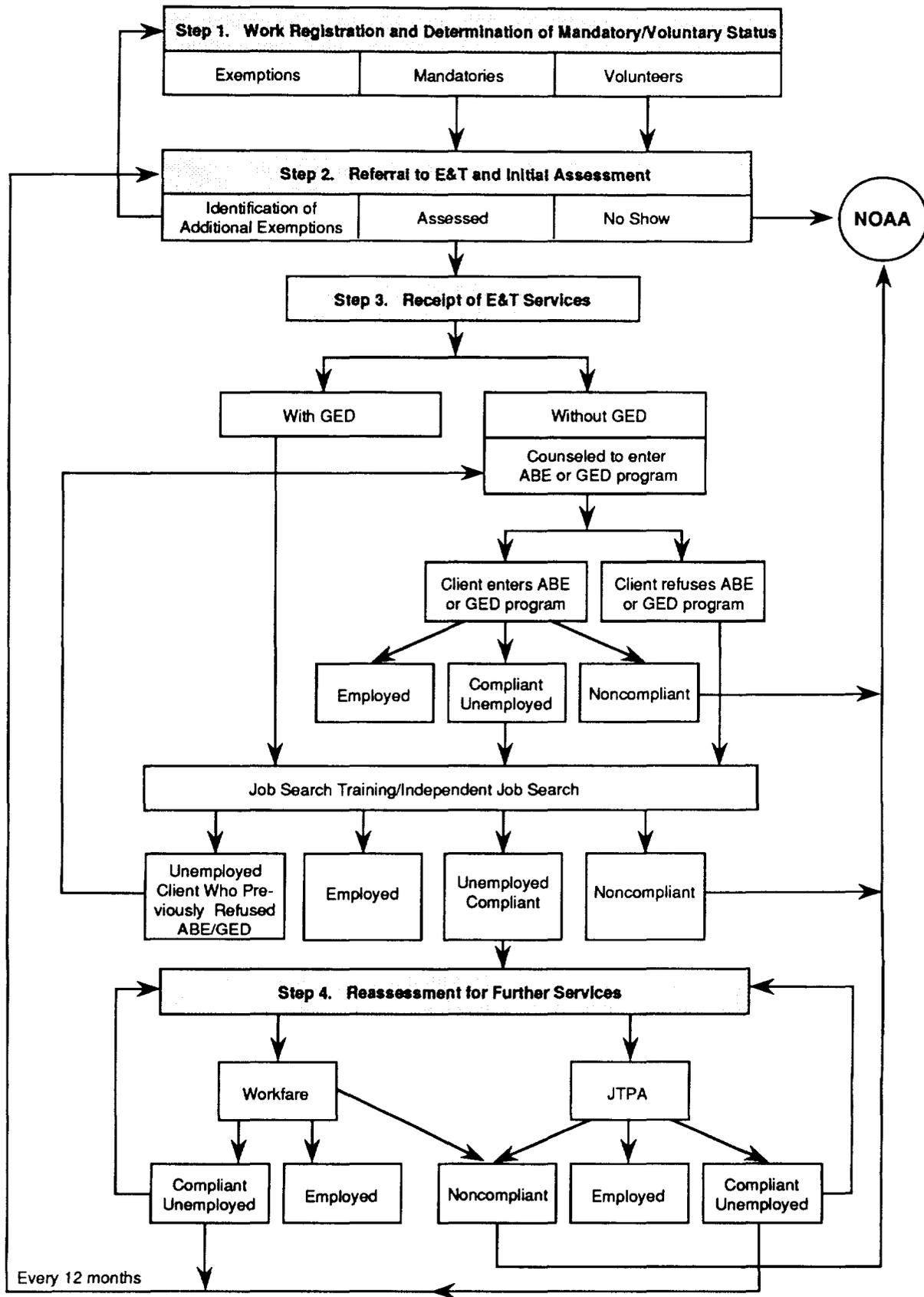


EXHIBIT 7-1 CLIENT FLOW: HINDS COUNTY, MISSISSIPPI

**FOOD STAMP EMPLOYMENT AND TRAINING PROGRAM DESCRIPTIVE PROFILE
HUDSON COUNTY, NEW JERSEY**

Case Study Site: Hudson County, New Jersey.

Name of Program: Food Stamp Employment and Training.

The Food Stamp Employment and Training (E&T)¹ program in New Jersey is a county-administered program for Food Stamp recipients who are not receiving AFDC. Employable General Assistance (GA) recipients who are also receiving Food Stamps but not actively participating in the statewide General Assistance Employability Program (GAEP) are also required to participate in the FS E&T program. FS E&T services are provided in all 21 of New Jersey's counties.

AFDC recipients subject to employment and training program requirements participate in the REACH/JOBS program. Employable GA recipients are required to register for GAEP, a statewide work relief/employment and training program administered jointly by the State Employment Services and the 567 municipal welfare offices in New Jersey. Before FY 90, GAEP registrants were categorically exempt from E&T. However, this policy was changed because many GAEP registrants are not actively participating in GAEP.

State Agency Responsible for the E&T Program

At the time this study was conducted, New Jersey's Department of Human Services, Division of Economic Assistance, Office of Program Regulations was the state agency responsible for the supervision of the FS E&T program. In January 1992, however, the state streamlined all employment and training programs (with the exception of the REACH/JOBS program) under the state Department of Labor (DOL).

¹ The Food Stamp Employment and Training program in New Jersey will be referred to as "E&T" throughout this descriptive profile.

Local Agency Responsible for the E&T Program

At the time the study was conducted the Hudson County Welfare Agency, Division of Social Services, NPA Division was responsible for E&T. In January 1992, as a result of the state reorganization, responsibility for E&T shifted to the local Employment Service office of New Jersey's DOL. This descriptive profile describes the FS E&T program in Hudson County at the time this study was conducted.

State and Local Roles and Responsibilities

The FS E&T program in New Jersey is county administered. While the state sets the client targeting, component option and minimum standard policies for the FS E&T program, the county welfare agencies (CWAs) determine whether services should be contracted out, and the local program design and service sequence. Three state regional specialists (one each for the north, south, and central portions of the state) act as liaisons with the CWAs and provide technical assistance regarding program planning and interpretation of policy.

The state requires each county to form a Local Planning Committee composed of the state FS E&T Regional Specialist, the local FS E&T coordinator, and local employment and training representatives including Employment Services, JOBS, JTPA, education and any other appropriate agencies. (Hudson County, however, did not form a local planning committee for FS E&T.)

Location of Program Responsibility Within Local FSA

In Hudson County, the NPA Verification Income Monitoring unit is responsible for the provision of E&T services. NPA eligibility technicians determine E&T work registration status and refer mandatory registrants and volunteers to the FS E&T coordinator for services. The FS E&T coordinator is responsible for orientation, assignment to individual job search, and sanctioning noncompliant participants.

Types of Service Providers Used

Independent job search is the only program component offered to FS E&T participants in Hudson County. In rare exceptions, referrals to JTPA are made when participants request information regarding training opportunities in the community. Typically, referrals to outside providers are not made in Hudson County.

State and Federal Funding

New Jersey's statewide budget for the E&T program Fiscal Year 1991 totaled \$1,547,185. Federal formula funds accounted for 80% of this total (\$1,233,907); state funds were used only to match transportation and dependent care costs, and amounted to \$313,278. FY 91 is the first year New Jersey anticipates spending its full formula allocation.

The per-participant cost for independent job search was estimated to be \$106 during PY 90 and \$118 during PY 91 (excluding supportive services).

I. FOOD STAMP EMPLOYMENT AND TRAINING PROGRAM PARTICIPATION REQUIREMENTS

Mandatory Participants and Exemption Categories

NPA eligibility technicians determine client eligibility for Food Stamp benefits and identify mandatory work registrants and volunteers for FS E&T. Those exempt from participation under the federal guidelines are not referred to the FS E&T coordinator.

During the orientation interview, the FS E&T coordinator identifies those who should be exempt from E&T participation for individual reasons-- lack of transportation access, medical or social problems, and 60-day job attached.

New Jersey does not grant categorical exemptions. For PY 91, however, 3,500 of the 15,333 mandatory work registrants were expected to be granted

individual exemptions. This represents 22.8% of the work registrant population in the state.

Participant Volume and Extent of Participation by Volunteers

Hudson County FS E&T participation data for January through May 1991 were as follows:

Number of work registrants referred to E&T	330
Number exempt	67
Number of E&T participants who began individual job search	105
NOAAs sent	66
Number of E&T participants sanctioned	53

While volunteers are allowed to receive E&T services, it is not encouraged. The Hudson County FS E&T coordinator could recall only one volunteer in the past 5 years.

For PY 90, statewide NJ participation figures were as follows:

New work registrants	13,282
Exempted	1,860
Volunteers who began E&T component	1,423
Mandatory who began E&T component	6,043

Component participation for the state for PY 90 was as follows: independent job search (74%), group job search (17%), education (4%), and vocational training (5%). In Hudson County, independent job search is the only component offered.

Description of Sanctioning Procedures

The FS E&T coordinator in Hudson County, who is an income maintenance worker, is responsible for sanctioning noncompliant FS E&T participants. Participants who fail to respond to a second call-in letter for orientation or miss a follow-up monitoring interview are subject to sanction. In Hudson County, for the period January through May 1991, 66 NOAAs were sent out and 53 FS work registrants were sanctioned. In FY 90, the state sent out 2,844 NOAAs.

II. CLIENT TARGETING POLICIES AND CLIENT FLOW SEQUENCE

Client Targeting Policies

New Jersey has no client targeting priorities within the mandatory work registrant population. All mandatory work registrants are to be served. Since Hudson County offers only individual job search services, all mandatory participants receive the same services. Hudson County would like to introduce client targeting policies since a substantial number of participants are hard to serve, i.e., homeless.

Client Flow and Service Sequencing

Exhibit 8-1 details the client flow through Hudson County's FS E&T program. Step 1 is work registration of mandatory participants and volunteers, conducted by NPA eligibility technicians. Orientation and assignment to individual job search (Step 2) is conducted by the FS E&T coordinator.

Participants who complete the eight week individual job search component have fulfilled their program obligations for the year, and are not subject to additional work requirements until they are recertified for FS benefits 12 months later. E&T cases are closed when individuals are sanctioned, employed, fulfill the E&T program requirements, or leave the FSP caseload for any reason.

III. E&T SERVICE COMPONENTS

Services Required for Some or All Work Registrants

All mandatory work registrants must attend a one-on-one orientation interview with the FS E&T coordinator. This orientation session focuses on the appropriate documentation needed for the employer contact log and is extremely brief. Those not individually exempt from participation are

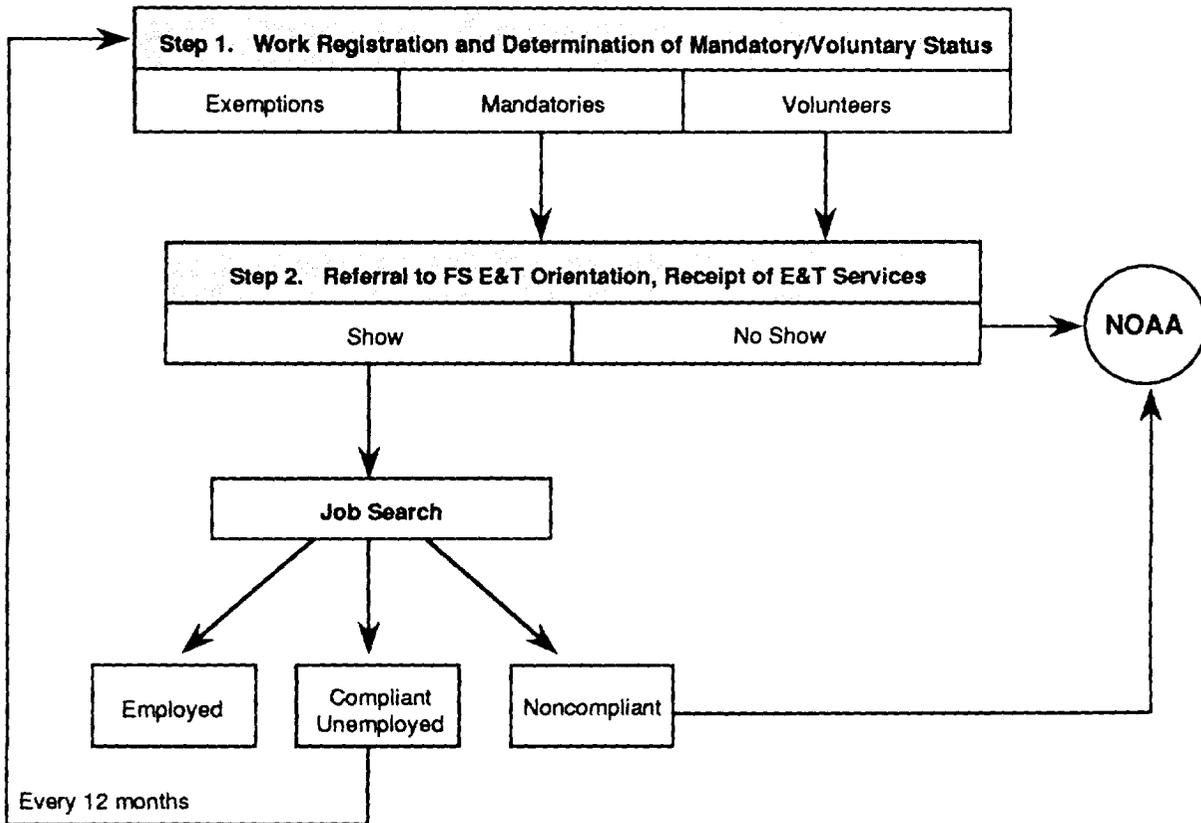


EXHIBIT 8-1 CLIENT FLOW: HUDSON COUNTY, NEW JERSEY

required to conduct an 8-week individual job search. During each 4-week period, participants are required to make 12 in-person employer contacts and attend a follow-up interview session with the E&T coordinator. During these follow-up interviews the employer contact log is reviewed by the FS E&T coordinator and a voucher is completed for \$25 transportation reimbursement. Participants are allowed \$25 transportation reimbursement for each 4-week job search period. Dependent care reimbursements are not provided in Hudson County, since the only component offered is job search.

Additional Services That Can Be Requested by Mandatory Registrants or Volunteers

In Hudson County, only independent job search services are offered. Hence, additional services are not available to mandatory registrants or volunteers. Individuals could volunteer for a second cycle of independent job search. While referrals may be made to JTPA services, these services are not tracked as E&T service components and rarely occur.

IV. HOW COORDINATION/CONSOLIDATION AFFECTS THE OPERATION OF THE FOOD STAMP E&T PROGRAM

Consolidation Linkages

At the time the study was conducted, the administration of FS E&T, GAEP, and REACH/JOBS at the state level was consolidated in the Department of Human Services, Division of Economic Assistance. In January 1992, all employment and training programs (with the exception of REACH/JOBS) were consolidated in the state Department of Labor. The reorganization is intended to increase coordination from the state down to the local level.

In Hudson County, FS E&T is not consolidated with any other employment and training programs. This results in the FS E&T program operating separately. Thus, E&T participants are unable to benefit from coordination linkages developed under the REACH/JOBS program.

Financial Coordination Linkages

Neither the state nor Hudson County has developed any financial agreements for the provision of FS E&T services.

Nonfinancial Coordination Linkages

At the state level, a nonfinancial agreement between the GA and FS program exists to ensure GA recipients are referred to NPA financial case workers and, if appropriate, work registered for FS E&T.

Hudson County has not developed nonfinancial agreements with any other service provider in the community for the referral of FS E&T participants to additional services. This lack of coordination results in limited services to participants attempting to secure either increased skills or assistance with job placement efforts.

**FOOD STAMP EMPLOYMENT AND TRAINING PROGRAM DESCRIPTIVE PROFILE
SUFFOLK COUNTY, NEW YORK**

Case Study Site: Suffolk County, New York.

Name of Program: Food Stamp Employment and Training.

The Food Stamp Employment and Training (E&T)¹ program in New York is a state-supervised, locally-administered work program for Food Stamp recipients who are not also receiving AFDC. Funds are distributed to 57 of 58 county Departments of Social Services, which make their own arrangements for providing E&T service. (One rural county is geographically/categorically exempt.) A statewide General Assistance program called Home Relief (HR) is available to individuals who are not eligible for assistance under a federal program. Work requirements for HR recipients are closely coordinated with participation requirements for the E&T program for Food Stamp recipients, and monitoring required of job search efforts is consolidated for the two programs.

State Agency Responsible for the E&T Program

New York State Department of Social Services (DSS), Division of Income Maintenance, Bureau of Employment Programs.

Local Agency Responsible for the E&T Program

Suffolk County Department of Social Services (SCDSS).

State and Local Roles and Responsibilities

The Division of Income Maintenance, Bureau of Employment Programs.

¹ The Food Stamp Employment and Training program in New York will be referred to "E&T" throughout this descriptive profile.

develops the overall plan for the state E&T program as well as the work program for Home Relief and JOBS program for AFDC recipients. The state allocates E&T funds to counties. State staff issue administrative directives and periodic memos to district social service commissioners. The state Bureau also has responsibility for conducting formal evaluations of local E&T programs and for providing technical assistance during quarterly visits.

County social service departments are responsible for administering Food Stamp eligibility and E&T work registration requirements, and for organizing the E&T service delivery system. Counties may either conduct the E&T components in-house or contract these services to another provider. Most local social service administrative units also manage a variety of other programs sponsored by the state Department of Social Services, including JOBS for AFDC recipients and work requirements for Home Relief clients.

Suffolk County Department of Social Services program administrators have elected to contract with the Suffolk County Department of Labor (SCDOL) to provide E&T component services. This county agency also administers all local JTPA-funded programs, the AFDC work program (JOBS), and the Home Relief work program.

Location of Program Responsibility Within Local FSA

The eligibility unit of the Department of Social Services in Suffolk County is responsible for processing food stamp applicants, determining work registration status, and referring mandatory work registrants to the County Department of Labor. There are six SCDSS intake centers in the county (called Public Assistance Centers), wherein participant status is determined and referrals are initiated.

By contract with SCDSS, the Suffolk County Department of Labor provides E&T activities, including assessment, case management and client tracking, and job search and job readiness training component services. Four county Department of Labor E&T service sites are spread throughout the county. The administrative offices and two of the satellite offices are collocated with SCDSS Public Assistance Centers.

Types of Service Providers Used

Suffolk County Department of Labor (SCDOL) is the key provider, and the only one with which SCDSS has a financial contract. SCDOL directly operates the job search and job readiness training components through in-house case management and instruction. SCDOL also administers a wide range of programs, including all local JTPA-funded programs, AFDC work programs, and Home Relief work programs. In addition, SCDOL refers E&T participants to education and job skills training components offered by local JTPA providers or local vocational technical schools operated by the statewide Board of Cooperative Educational Services (BOCES).

State and Federal Funding

New York's planned FY 91 costs included a total budget of \$11,429,538 for the operation of the FS E&T program:

Total 100% Funds:	\$5,285,632
Additional E&T Expenditures	
50% Federal:	\$2,100,388
50% State:	\$2,100,388
Transportation	
50% Federal:	\$953,123
50% State:	\$953,123
Dependent Care	
50% Federal:	\$18,442
50% State:	\$18,442

Federal funds accounted for 73.1% of total planned costs.

According to the state's FY 91 budget, spending occurred across components as follows:

Job Search:	\$1,917,770
(approximately 17% of the total budget)	
Job Readiness Training:	\$3,200,067
(about 28% of total budget)	
Job Skills Training:	\$2,723,947
(about 24% of total budget)	
Education:	\$1,259,624
(11% of total budget).	

Combined component expenses accounted for 80% of the FY 91 budget. Transportation reimbursement was budgeted across all components and accounted for nearly 17% of the budget. Child care was only budgeted for the job skills training and education components; it accounted for less than 1% of the budget.

The state's estimated cost per participant for the E&T components are as follows:

Job search:	\$46
Job readiness training:	\$126
Education:	\$92
Job skills training:	\$148.

During FY 90, Suffolk County received \$89,058 in combined federal 100% and matched federal and state funds.

The FY 90 budget for Suffolk County allocated expenditures across all E&T activities as follows:

Assessment/EDP:	32%
Job Search:	45%
Job Readiness Training:	10%
Education:	6%
Job Skills Training:	6%

I. FOOD STAMP EMPLOYMENT AND TRAINING PROGRAM PARTICIPATION REQUIREMENTS

Mandatory Participants and Exemption Categories

Individuals receiving Food Stamps are subject to Food Stamp work registration/E&T participation requirements unless they are exempt according to federal exemption criteria or exempt according to state categorical or individual exemption criteria

New York exempted 9.5% of all federal Food Stamp work registrants. Only one county received a categorical geographic exemption, accounting for 63 work registrants. Additional categorical exemptions included homeless living

in New York City, and homeless participating in employment and training programs in Camp LaGuardia, New York. These accounted for approximately 30% of exemptions (3% of work registrants). Individual exemptions included lack of child care, job attached persons, seasonal and migrant workers, and those with substantial barriers to employment. Individual exemptions comprised 65% of exemptions (6% of work registrants).

Individuals participating in non-AFDC public assistance programs such as Home Relief are not categorically exempt from participating in the E&T program. New York projected that over 85% of FS E&T mandatory work registrants would be Home Relief recipients.

Participant Volume and Extent of Participation by Volunteers

Although service to volunteers is included in the state plan, New York's E&T staff indicated that the program was not designed to serve volunteers, due to resource limitations.

Statewide, the E&T program had planned to enroll 65,000 participants in service components during the first nine months of FY 91, and had actually enrolled over 104,000 participants.

Suffolk County is also serving substantially more participants than they planned. The FY 91 plan indicated that a total of 1,434 participants would be enrolled into E&T services. As of August, 1991, the program had enrolled 2,554 participants (of which nearly 85% were Home Relief recipients). Most E&T participants were enrolled in individual job search, which accounted for 94% of all service placements. No volunteers were enrolled.

Description of Sanctioning Procedures

New York's FY 91 E&T plan projected that 8,430 NOAAs would be sent for noncompliance. Quarterly data obtained from the state show that, for the four months between 4-1-91 and 7-31-91, a total of 1,812 NOAAs were sent. Of these, 1,532 Food Stamp and Home Relief recipients were sanctioned.

Approximately 53% were HR/FS E&T participants, the remainder were NPA/FS E&T clients.

Requests for sanctions are initiated by the Suffolk County Department of Labor (SCDOL), which tracks client progress and documents noncompliance. SCDOL sends Suffolk County Department of Social Services (SCDSS) lists of clients who have not attended required meetings with case managers or completed required service components. SCDSS liaison staff contact clients and schedule conciliation sessions to determine if the individual had good cause for failure to comply. August 30, 1991 data for the program year (10/1/90 through 9/30/91) indicates that SCDOL requested 1,132 E&T sanctions and that 374 case were actually sanctioned by SCDSS. Case closings prior to the sanction request, clients entering employment and the establishment of good cause are among the reasons for not sanctioning an individual. Of the 1,132 E&T terminations in Suffolk County through August, 1991, slightly over 33% were closed through sanctions.

II. CLIENT TARGETING POLICIES AND CLIENT FLOW SEQUENCE

Client Targeting Policies

There are no client targeting priorities in Suffolk County. All mandatory nonexempt work registrants are required to report to SCDOL for E&T participation. Home Relief recipients are also required to participate unless they meet individual exemption criteria. Voluntary participation is allowed according to the state plan, but it is not encouraged in Suffolk County.

Client Flow and Service Sequencing

Food stamp applicants begin at one of the six Suffolk County Department of Social Services (SCDSS) Public Assistance Centers, where they are determined to be either mandatory work registrants or exempt. Eligibility for all benefit programs (Home Relief , AFDC, Food Stamps) is determined at

the same time. For Home Relief and Food Stamp benefit programs, the eligibility process takes several days to several weeks.

At the initial eligibility assessment interview, Food Stamp applicants who are not exempted from E&T are given a referral form and told to report to the Suffolk County Department of Labor (SCDOL) offices to enroll in job search or another component. SCDOL staff enroll the applicant into an E&T or Home Relief work component and complete the referral form, which the client must take back to the Public Assistance Center to prove he is in compliance. When all of the eligibility requirements are satisfied, the food stamp case is opened and ongoing benefits authorized. Thus, clients may begin or actually complete job search components before they have started to receive food stamp benefits.

experience to determine which E&T component is appropriate for the client. Services available through SCDOL are also explained during this initial meeting. Program eligibility for applicants who applied for both Food Stamps and Home Relief benefit programs at the Public Assistance Center has not yet been determined at the time of referral to SCDOL. Caseworkers first assign HR/FS applicants to Home Relief job search, but transfer them to the FS E&T job search once they receive notice the client's food stamp file is opened. Except for some administrative requirements, the job search components for

unemployed. Typically, those in education or training programs must also participate in job search during school breaks.

NPA/FS participants need only complete one cycle of job search per year. If still receiving Food Stamps, their work registration status is reviewed annually. HR/FS participants, however, must be reassessed after each service component, and, if not employed, continue to participate. These participants frequently complete two or more job search cycles, one as a Food Stamp work registrant, and others as a Home Relief work registrant.

FS E&T job search participants are required to contact 24 employers in an eight week period. Job search is not supervised; however, follow-up appointments with case managers are required at weeks 4 and 8. Those having trouble with the job search or whose prospects for employment are not good midway through the job search may be required to enroll in the job readiness training component. This component provides a two-day, 12-hour employment readiness training class. The class provides job search information and techniques for keeping a job. Generally, few participants receive this training, but those who do receive it in the middle of job search.

After completing the initial job search, the E&T participation requirement is satisfied for 12 months for NPA/FS recipients. In contrast, Home Relief work program participants must contact 6 employers every 2 weeks. While the total is the same as the job search required for FS E&T, Home Relief recipients undergo more scrutiny because they are required to report to SCDOL every 2 weeks. Further, Home Relief work program participants who do not have 6 employer contacts during their follow-up meetings must provide good cause to the liaison unit responsible for sanctions (rarely the case for E&T participants short of the 12 contacts at week 4). Home Relief recipients must also continue job search or participate in another component until they find a job or leave the Home Relief rolls.

III. E&T SERVICE COMPONENTS

The E&T program includes the following components for mandatory participants: job search, employment readiness training, job skills training, and education.

Services Required for Some or All Work Registrants

E&T participants who are not receiving cash assistance are required to participate in the job search component only once during a 12-month period. Some E&T participants may also be required to participate in employment readiness training concurrently with job search. They must complete 24 employer contacts within 8 weeks. During job search, participants are also required to report to E&T case managers for follow-up at least twice--at the mid point (12 contacts or 1 month), and upon completing the job search component. The job search is largely unsupervised, but case managers may provide some one-on-one guidance.

The majority of E&T participants receive both Home Relief and Food Stamp benefits. Therefore, once they complete the E&T job search component, they may be required to go through the same job search exercise again, this time as a Home Relief work program participant.

The employment readiness training component includes two options: a job search workshop and a 2-hour job club. The employment readiness workshop is designed as a 12-hour classroom session, over a 2 day period. It was designed specifically for E&T participants. The workshop is largely an "employment maturity workshop" that emphasizes personal appearance, job applications, interviewing techniques, and job seeking and survival skills. Further, sessions may incorporate life skills curriculum such as developing personal goals, identifying barriers and planning strategies to overcome them.

For those who cannot attend the E&T employment readiness workshop (offered only once a month), "job club" activities may include shorter

versions of the employment readiness workshop. Other job club activities may include directed employer contact (phone interviews), interviewing, resume writing, and identifying and contacting potential employers. Job club is operated as a consolidated component for both the Home Relief work program and the E&T program.

Vocational training is available to interested E&T participants by referral to a local-, state- or federally funded program. There are no set training requirements, or minimum/maximum training periods. E&T clients referred to this component are tracked through the MIS/client tracking unit of SCDOL. Once enrolled in a training component, E&T participants must maintain attendance or risk sanctioning. Vocational training providers have included New York's BOCES, and JTPA programs. Access to vocational training is constrained by the funding and space limitations of the individual providers. In addition, some programs may target clients with different characteristics from the Food Stamp population.

Education component activities are provided at no cost through existing agencies and programs. Examples of training include literacy training, basic education, GED, and ESL. JTPA programs and New York's BOCES facilities have accepted E&T participants; however, limited funding and class size limits prevent some FSP recipients from enrolling.

Additional Services That Can Be Requested by Mandatory Registrants or Volunteers

Transportation assistance is available to any E&T client who demonstrates such a need. The allowance is limited to \$24/month while participating in E&T components. E&T participants receive a direct check to buy gas or are given tokens for public transportation (most clients get tokens). In some instances, case managers have used this fund to help purchase tools or books required for training.

Reimbursement funds for child care is available to those participating in the job skills training and education components. Suffolk County has rarely accessed these funds.

IV. HOW COORDINATION/CONSOLIDATION AFFECTS THE OPERATION OF THE FOOD STAMP E&T PROGRAM

Consolidation Linkages

In New York, benefits administration and work program operations are partially consolidated for the AFDC, Home Relief, and Food Stamp programs. In particular, job search requirements for FS E&T and Home Relief are closely coordinated. In Suffolk County, most Food Stamp E&T participants are also Home Relief recipients subject to Home Relief work requirements. While the two work programs are distinct, case manager supervision of job search requirements are consolidated for the two programs.

Service Coordination Linkages

The Suffolk County Department of Social Services contracts with the Suffolk County Department of Labor on a cost reimbursement basis to implement case management, client tracking, referrals to other providers and the job search and job readiness training components for FS E&T participants. Additionally, SCDSS and SCDOL have entered into a nonfinancial coordinating agreement to help administer all programs shared by the two agencies.

There are no formal arrangements between SCDSS and education providers (e.g., BOCES, the state's vocational education system) nor E&T funds to pay for education or training services for E&T participants, but the communication links between SCDSS, SCDOL and BOCES appear strong. According to local administrators, SCDSS and BOCES cooperate in trying to find funding for education and vocational referrals.

**FOOD STAMP EMPLOYMENT AND TRAINING PROGRAM DESCRIPTIVE PROFILE
MONTGOMERY COUNTY, OHIO**

Case Study Site: Montgomery County, Ohio.

Name of Program: IN-VEST (Independence through Vocational Employment Services and Training).

The Food Stamp Employment and Training program in Ohio is a state-supervised, locally administered program. Mandatory work registrants include individuals receiving only Food Stamps (NPA/FS cases) and individuals receiving Food Stamps in conjunction with state General Assistance (GA/FS cases). The Job Opportunities and Basic Skills Training Program (JOBS) is another work program operated by Ohio for individuals receiving AFDC, with or without Food Stamp benefits. At both the state and county levels, the JOBS program for AFDC recipients and work requirements for NPA/FS and GA/FS cases are operated using a consolidated program design. In Montgomery County, these programs are integrated into one administrative unit called IN-VEST. IN-VEST¹ serves work registrants from both the AFDC and Food Stamp programs. GA/FS recipients are served through the Food Stamp E&T program; there is no separate work program for GA recipients.

State Agency Responsible for the E&T Program

Ohio Department of Human Services (ODHS), Work and Training Section.

Local Agency Responsible for the E&T Program

Montgomery County Department of Human Services (MCDHS).

¹ In this report, IN-VEST refers to the Montgomery County employment and training program that serves work registrants in all benefit programs; "E&T" is used to refer specifically to the Food Stamp Employment and Training program.

State and Local Roles and Responsibilities

The Department of Human Services sets the general policy and issues guidelines for all public assistance work programs. Eligibility guidelines, exemption criteria, program components and emphases, and the NOAA and sanctions processes are developed by state staff. The Work and Training Section develops the state E&T budget and suggests a formula for distributing 100% E&T funds to the counties. State staff also conduct program and financial oversight annually; the E&T review is conducted during formal reviews of all other public assistance work programs. The state was also instrumental in integrating the E&T program with the federal JOBS program for AFDC recipients and state work requirements for GA recipients.

Within the guidelines established by the state, the Montgomery County Department of Human Services IN-VEST unit determines how to organize service delivery, whether to target specific clients, and how to integrate work requirements for AFDC recipients with those for mandatory nonexempt Food Stamp work registrants, including GA recipients.

Location of Program Responsibility Within Local FSA

MCDHS coordinates regular JOBS and E&T funds allocated by the state, as well as funds received for several demonstration projects and nonfinancial linkages with other agencies to provide a wide array of employment and training services to public assistance recipients. In Montgomery County, work activities for all public assistance clients are integrated into one program called IN-VEST. IN-VEST functions are carried out by several MCDHS units. Eligibility, work registration, preliminary assessment, and referral to IN-VEST program units are the responsibility of the case workers in the Income Maintenance unit. Income Maintenance staff are also responsible for issuing Notices of Adverse Action (NOAAs), conducting the conciliation process, and implementing sanctions. Case management, reassessments for clients participating in components, service assignment and tracking, follow-up, and reports of noncompliance are conducted by staff in one IN-VEST unit; a separate IN-VEST unit operates the community work experience program

(CWEP) component, as well as a subsidized employment component. Program management and oversight are conducted by the administrative staff of MCDHS.

Four components are available to IN-VEST participants in Ohio: (1) job club, (2) education and training, (3) community work experience, and (4) subsidized employment (SEP). Food Stamp E&T work registrants receiving only Food Stamps are not referred to the subsidized employment component, since federal E&T funds may not be used for this purpose. MCDHS administers the overall E&T program and directly operates the community work experience component and the subsidized employment component. Referrals to local agencies are used for services under the employment and training component. The job club component is operated by local agencies under contract with MCDHS.

Types of Service Providers Used

MCDHS contracts with CBOs, state education agencies, proprietary schools, and the local Private Industry Council to provide job club services to mandatory nonexempt work registrants in the E&T program. The program's current contractors include the Greater Dayton JTPA, Miami-Jacobs College, Goodwill Industries, Jobs for America, and Prep Ohio.

In addition to these providers, E&T participants assigned to the education and training component are referred to other local educational programs for such services as GED through the local ABE system or literacy training through local CBOs. Referrals for vocational training are made to local community colleges, community-based organizations, and the local JTPA program.

State and Federal Funding

The statewide budget for Ohio's Food Stamp E&T program in FY 91 totaled \$20,092,692. Of the total budget, federal formula funds accounted for \$4,017,918, and 50% state/50% federal funds for program costs totaled \$8,018,290. Transportation and dependent care costs were budgeted at

\$8,056,484, but state staff indicated that the amount budgeted for dependent care was much higher than actually expended. Overall, federal funds from the Food Stamp Employment and Training Program comprised 60% of the planned FY 91 budget for services to E&T participants.

Ohio allocated 100% E&T funds to all counties, giving each a minimum of \$30,000 and allocating the remaining amounts based on the proportion of Food Stamp population in the county. During FY 91, Montgomery County received \$116,691 in 100% E&T funds.

I. FOOD STAMP EMPLOYMENT AND TRAINING PARTICIPATION REQUIREMENTS

Mandatory Participants and Exemption Categories

Individuals receiving Food Stamps are subject to Food Stamp work registration/E&T participation requirements unless they are exempt according to federal exemption criteria or exempt according to state categorical or individual exemption criteria. In Ohio, there are no categorical exemptions; the E&T program is operational in all counties. Individual exemptions recognized by the state are: (1) lack of child care; (2) lack of supportive/social services; (3) temporary layoff within 90 days of approval; (4) communication or language barrier; (5) transportation limitation; (6) medical limitation, including pregnancy; and (7) migrant workers.

ODHS projected that there would be 114,530 E&T work registrants statewide during FY 91. The state plan for FY 91 includes the following estimates for Food Stamp E&T exemptions:

Lack of child care	1,632
Lack of supportive/social services	173
Temporary layoff within 90 days of approval	181
Communication or language barrier	514
Transportation limitation	3,297
Medical limitation, including pregnancy	9,611
Migrant workers	<u>104</u>
Total	15,512

Overall, 14% of Ohio's work registrant population was expected to be exempt from the E&T program in FY 91.

Participant Volume and Extent of Participation by Volunteers

The state of Ohio does not allow volunteers to participate in the E&T program. Of the 99,018 expected mandatory nonexempt work registrants, ODHS projected that 20% would receive NOAAs. ODHS anticipated that 42% of mandatory nonexempt Food Stamp work registrants would begin components during FY 91. Statewide, the community work experience component was projected to receive the highest enrollment (47% of all service placements); 37% of placements were projected to be into the education and training component; and ODHS projected that approximately 16% of placements would be into the job club component.

MCDHS data for the 12 months ending August 30, 1991, indicate that 9,727 IN-VEST participants were served.² Of all IN-VEST clients assessed, 76% were AFDC recipients, and 24% were GA/FS and NPA/FS recipients. In Montgomery County, nearly all E&T participants receive GA. Approximately 52% of IN-VEST participants initially entered job club, 44% initially entered the education and training component, and only 4% initially entered the community work experience component. Thus, Montgomery County used job club and education/training substantially more than the projected state average and used community work experience substantially less than the projected statewide average.

² Data provided by MCDHS included all work program participants--AFDC/JOBS and GA and NPA recipients participating in E&T. Because of the administrative integration of these programs, the county does not have the ability to separate out services received by E&T clients.

Description of Sanctioning Procedures

MCDHS case managers initiate the sanctions process by notifying the Income Maintenance (IM) unit staff that a client failed to comply with IN-VEST procedures. Case managers may initiate sanctions under the following circumstances: (1) clients do not appear for appointments or fail to reschedule a missed appointment, (2) clients fail to attend a required activity, or (3) clients disenroll or terminate an activity and do not contact their case manager. The IM unit notifies clients by mail that they have 7 days to contact MCDHS with good cause for noncompliance. Sanctions are applied 15 days after the IM unit sends the client a notice of adverse action.

Once sanctioned, NPA/FS work registrants stop receiving their monthly \$25 E&T participation reimbursement. Their Food Stamp benefits are also stopped. Sanctions on Food Stamp benefits end when the clients agree to comply with work requirements or when the 2-month sanction ends, whichever comes first; the \$25 reimbursement begins again when mandatory work registrants start participating in E&T components.

Data indicate that the initial no-show rate for all work registrants referred to IN-VEST was 51%. Montgomery County statistics for FY 91 (year-to-date through August 1991) indicate that the IN-VEST unit recommended 1,753 sanctions (which is 87% of all service placements) to Income Maintenance unit staff for failure to comply either initially or after assignment to services, and that in 340 instances (16% of all service placements) sanctions were actually imposed (these data include all IN-VEST participants--AFDC, GA, and NPA/FS).

II. CLIENT TARGETING POLICIES AND CLIENT FLOW SEQUENCE

Client Targeting Policies

There are no particular priority groups within the mandatory Food Stamp registrant pool in Montgomery County or in Ohio. The goal of Montgomery County's program for FY 91 was simply to serve as many participants as possible. Yet volunteers were not allowed to participate during FY 91, although this option is being explored for FY 92. The majority of Food Stamp recipients in Montgomery County also receive AFDC (71%) and are thus subject to JOBS work requirements rather than E&T requirements. Of the mandatory work registrants, most also receive GA.

Client Flow and Service Sequencing

ODHS has developed specific regulations that influence client flow and service sequencing at the local level. First, ODHS made the community work experience component the default component for all mandatory work registrants: those who choose not to participate in any other components must enter work experience; if client enrollment is delayed, or clients are between educational or vocational courses for extended periods, they must participate in community work experience.

A second state guideline recommends that whenever programs develop a multiple plan of services for work program participants, staff first assign them to the job club component.

Finally, during the period covered by the study the state required that all mandatory GA work registrants who are between 19 and 40 years of age and without high school equivalency must participate in the employment and training component. (This requirement was dropped as of October 1, 1991).

The client flow in Montgomery County frequently involves the use of multiple components to address participants' needs. The sequence of services usually includes a mix of job club and education and training. GA recipients

must enter education and training first. Local staff use the community work experience component only as a last resort, usually for those participants who, at the first assessment, indicate that they do not want training or placement assistance.

Exhibit 10-1 details the client flow through Montgomery County's E&T program. Once GA/FS and NPA/FS recipients are determined to be mandatory work registrants, they are referred to the consolidated work program unit for orientation and assessment. The group orientation is conducted separately for AFDC/JOBS participants and GA or NPA/FS participants in the E&T program, primarily because AFDC/JOBS participants receive significantly more supportive services. In Montgomery County, individual assessments are conducted directly after the group orientation. At the time of the study, all mandatory E&T work registrants who were also GA recipients were required to enroll in an educational or vocational program. NPA/FS work registrants may select any E&T component to participate in. Those who do not select a component are immediately enrolled into community work experience. Participants may also be enrolled into work experience during long school breaks or if they do not attain employment after job club.

Clients terminate from the E&T program when they become exempt, attain employment, or terminate from the Food Stamp benefit recipient rolls.

III. E&T SERVICE COMPONENTS

Three primary components are available to E&T participants in Ohio: job club, education and training, and community work experience. GA/FS recipients may also be referred to a subsidized employment component, but this component is not considered part of the Food Stamp E&T program.

MCDHS contracts with other providers to conduct the job club component. The component may include direct job placement assistance or preemployment work maturity instruction. In most instances, job club includes substantial preemployment training--both job search assistance and "world of work"

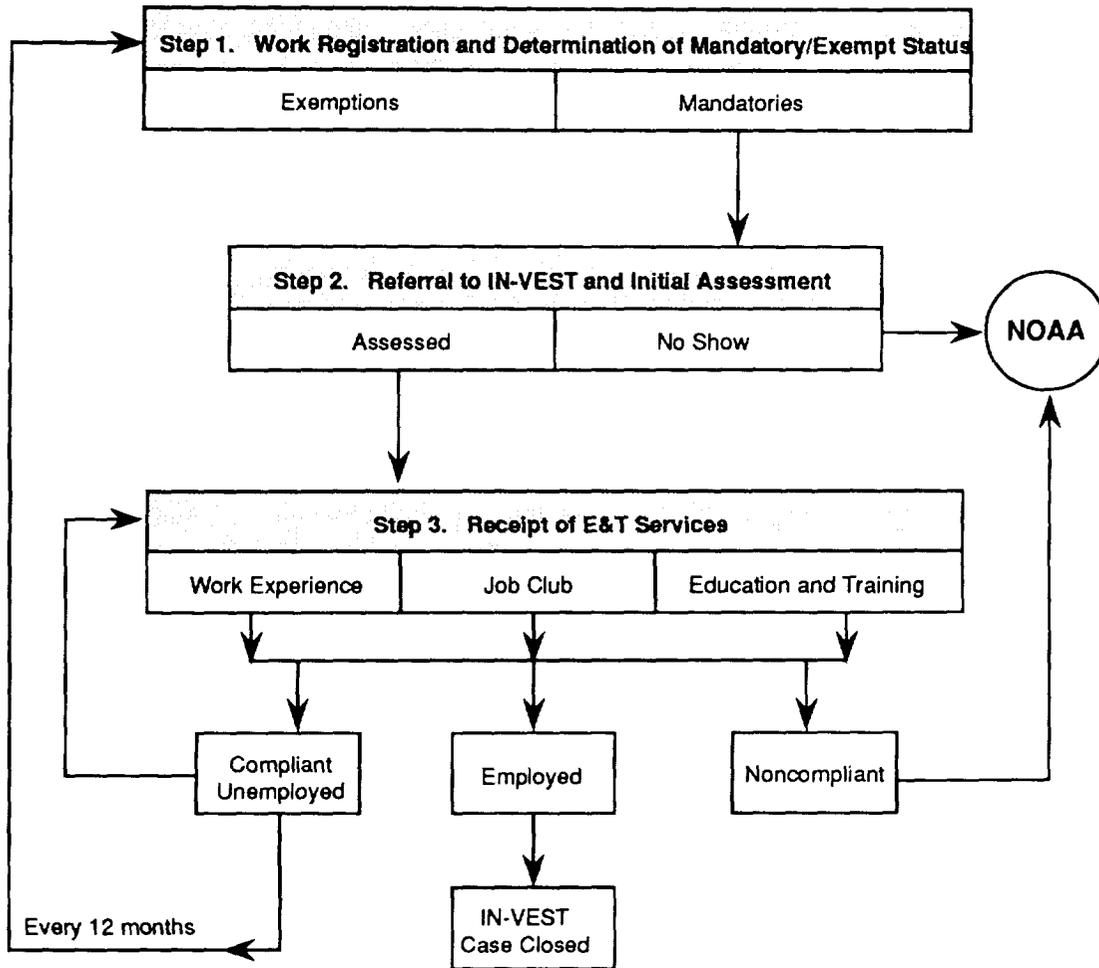


EXHIBIT 10-1 CLIENT FLOW: MONTGOMERY COUNTY, OHIO

instruction. After classroom training, participants are counseled and coached through the job search process; participants do not have a fixed number of job contacts to complete but work with their counselors or instructors to locate viable employment opportunities given each client's skills and goals. Each provider is responsible for instruction, counseling, and placement.

The education and training component is provided by referral to local educational agencies, proprietary schools, and CBOs. Basic skills remediation is provided for all participants whose reading levels are low, as indicated by the Test of Adult Basic Education (TABE). Further, all E&T participants who also receive GA must attend GED courses until they achieve high school equivalence. Vocational instruction is also provided by referral to local providers, including the local JTPA program, which may have additional funds to support those eligible for vocational training.

The community work experience (CWEP) program provides unpaid positions at local not-for-profit agencies or government agencies. The hours of training required of participants depend on the amount of their Food Stamp grant.

Services Required for Some or All Work Registrants

At the time the study was conducted, state regulations required all mandatory GA work registrants between the ages of 19 and 40 without high school equivalency to enter the education component. Receipt of GA benefits was contingent on this rule. The majority of mandatory work registrants are also GA recipients. Thus, the high enrollment in education and training reflects the large GA population included in the E&T program.

Further, mandatory E&T work registrants who do not select either the job club or education and training components are automatically assigned to community work experience.

All components in which mandatory work registrants are enrolled are considered mandatory (i.e., sanctionable) activities.

Clients receive \$25 per month for expenses related to their participation in the E&T program (transportation, work tools, books). E&T participants are also eligible for \$160 per month for dependent care.

Additional Services That Can Be Requested by Mandatory Registrants or Volunteers

Voluntary participation was not allowed in Ohio during FY 91. Mandatory work registrants who complete the job club component without attaining employment may receive further training through the education and training component.

IV. HOW COORDINATION/CONSOLIDATION AFFECTS THE OPERATION OF THE FOOD STAMP E&T PROGRAM

Consolidation Linkages

The E&T program is highly integrated with the JOBS program for AFDC recipients at both the state and local levels. The Ohio Department of Human Services plans and supervises the E&T program as an integrated program with the JOBS program for AFDC recipients, although funds for the programs are allocated separately.

In Montgomery County, the E&T program is considered an integral part of the IN-VEST program. Administration and operations are completely integrated, with a few exceptions. One is that the initial orientation sessions are conducted separately for IN-VEST/JOBS participants. NPA/Food Stamp recipients and recipients of Ohio's GA receive fewer supportive services, and there is less overall funding for these programs. Therefore, local staff keep these two populations separate during group orientation meetings to explain available services. Some job club services with outside

contractors are also segregated for AFDC/JOBTS and F&T (and GA recipients)

clients.

Service Coordination Linkages

Service coordination is extensive in Montgomery County. MCDHS has financial contracts for job club components with educational agencies, proprietary schools, and CBOs. Also, MCDHS has nonfinancial agreements to refer clients to services at state and local educational agencies, the local JTPA program, proprietary schools, and CBOs. During 1991, nearly 44% of all IN-VEST participants entering components enrolled in education and training components using nonfinancial coordination linkages.

**FOOD STAMP EMPLOYMENT AND TRAINING PROGRAM DESCRIPTIVE PROFILE
McCURTAIN COUNTY, OKLAHOMA**

Case Study Site: McCurtain County, Oklahoma.

Name of Program: Food Stamp Employment and Training.

In Oklahoma, the Food Stamp Employment and Training (E&T)¹ program serves Food Stamp recipients not receiving AFDC benefits. These are all non-public-assistance (NPA) Food Stamp clients, since there is no General Assistance program in Oklahoma.

State Agency Responsible for the E&T Program

Oklahoma Department of Human Services (DHS), Family Support Services Division.

Local Agency Responsible for the E&T Program

McCurtain County Department of Human Services (the local administrative unit of Oklahoma's Department of Human Services).

State and Local Roles and Responsibilities

Program policy is developed at the state level. For the E&T program, there is essentially one state-level administrator responsible for program design and monitoring. Training for local E&T staff and management evaluations for the E&T program are performed directly by the state E&T administrator. Authority for personnel management and other details of program operation flow through area and district levels of administration to the local (county) level.

¹ The Food Stamp Employment and Training program in Oklahoma will be referred to as "E&T" throughout this descriptive profile.

The state DHS system is divided into three areas, each of which has seven to nine districts. State area managers are aided by district supervisors, who in turn directly oversee each county's DHS office supervisors. At the local level, E&T workers may be supervised by Food Stamp supervisors or supervisors for the state's JOBS program for AFDC recipients, depending on local county administrators' discretion. In McCurtain County, the E&T worker is supervised by a Food Stamp supervisor.

Location of Program Responsibility Within Local FSA

Public assistance case workers in McCurtain County are organized into distinct units--one for AFDC/Food Stamp cases and another for Food Stamp-only cases. Food Stamp case workers are responsible for informing recipients of E&T services and referring volunteers as well as mandatory work registrants to the E&T worker.

The E&T case worker in McCurtain County is collocated with the Food Stamp benefits workers; referral to the E&T program occurs via an internal referral form. The E&T case worker is responsible for mailing all referred work registrants an appointment letter and conducting an intake/orientation session. The E&T worker also reviews work registrants' status for individual exemptions, enrolls nonexempt participants in E&T service components, monitors participation in independent job search, and makes referrals to other agencies for the remaining two service components. The E&T worker is also responsible for tracking noncompliance and requesting issuance of notices of adverse action (NOAAs) from the Food Stamp case workers.

Types of Service Providers Used

There are no financial agreements with outside E&T service providers in Oklahoma. There are three components in the program: independent job search, JTPA, and the Oklahoma Employment Service Commission (OESC). Of these, individual job search is provided in-house by the E&T case worker, while referrals are made to JTPA and OESC. The local agency administering JTPA directly provides assessment services and career counseling and makes

referrals to JTPA-funded providers for vocational training and on-the-job training. The Employment Service component is used for direct job placement services. (For many local employers, the Employment Service is the sole source of recruitment for job openings, so job placement services from OESC can be a crucial step for individuals seeking employment in the area.)

State and Federal Funding

Total funding for the FY 91 E&T program was \$1,391,892. Of this total, 100% federal formula funds totaled \$1,058,626, with additional E&T program expenditures budgeted at \$107,341 shared equally (\$53,670 each) by federal and state sources. Reimbursements for participant expenditures were budgeted at \$205,125 for transportation costs and \$20,800 for dependent care costs (shared 50% federal, 50% state).

I. FOOD STAMP EMPLOYMENT AND TRAINING PROGRAM PARTICIPATION REQUIREMENTS

Mandatory Participants and Exemption Categories

Of the state's 77 counties, 51 were given categorical exemptions. Six were exempted in FY 1991 because they each have fewer than 150 work registrants, relatively high unemployment rates, and limited job opportunities. Another 38 were exempted because they each had fewer than 200 work registrants, work registrants lived in remote areas, and there were limited employment opportunities. Another four were exempted because of unemployment rates above 7% (1% above the state average). Three more counties were exempted because of limited job opportunities. In all, 26 counties operate E&T programs.

Individual exemptions for mandatory work registrants include:

- Registrants residing an unreasonable distance from the county welfare office or from a potential employer--i.e., round trip exceeds 2 hours by public or private transportation.
- Registrants who are migrant or seasonal farmworkers away from their home bases and following the work stream.

- Registrants lacking adequate day care.
- Registrants with physical and/or mental problems.
- Registrants who are 55 years old or older and working under Title V of the Older Americans Act.

The state estimated that 39% of the statewide work registrant population in FY 1991 would be exempt from participation, including 12,736 because of geographic exemption and 802 individual exemptions from work registration.

Participant Volume and Extent of Participation by Volunteers

Planned participation levels of the 10,946 estimated nonexempt work registrants in the FY 91 statewide program were as follows: 9,404 placements (including 100 volunteers) in the independent job search component, 1,094 placements in the JTPA referral component, and 547 placements in the Employment Service referral component.

Description of Sanctioning Procedures

After a client's initial occurrence of noncompliance (e.g., missing an initial or follow-up appointment), the E&T worker sends the client a letter that reminds him/her of a missed appointment and notes the date and time of a rescheduled appointment. If a second appointment is missed and the client has not contacted the E&T worker, the E&T worker sends a form to the Food Stamp case worker requesting that a notification of adverse action be sent to the client and the sanctioning process begin.

The estimated rate of sanctions in FY 1991 was 20% of all nonexempt work registrants.

II. CLIENT TARGETING POLICIES AND CLIENT FLOW SEQUENCE

Client Targeting Policies

No particular group within the mandatory nonexempt work registrant population is targeted for services. Staff involved in program design believe that services can benefit all eligible registrants and do not want to "cream" participants from the eligible base. However, client-level staff indicate that they are likely to work more intensively with participants who show the most interest in finding work and seek assistance in doing so.

Client Flow and Service Sequencing

Food Stamp recipients register for work with their benefits case worker, who then makes a referral to the E&T case worker. For the actual receipt of E&T services, McCurtain County enrollment procedures recently changed from concurrent enrollment of participants in all three components to sequential enrollment. The initial E&T orientation/assessment session used to be conducted as a group session. Recently, however, concern for participant confidentiality led the E&T case worker to institute individual orientation interviews.

Most clients are assigned to individual job search as their first component unless they specifically request training that can be provided through the JTPA component. Usually, referral to the JTPA or Employment Service component is considered a supplementary service for clients who cannot find a job after a period of individual job search. A participant might be referred to OESC as the first component if he/she desired to work with an employer who hires only through OESC. Exhibit 11-1 illustrates the client flow in McCurtain County.

The E&T case is closed when a participant has satisfied the participation requirement by completing required components. Although Food Stamp eligibility is usually recertified every 4 months, participation in the E&T program is required only once per year.

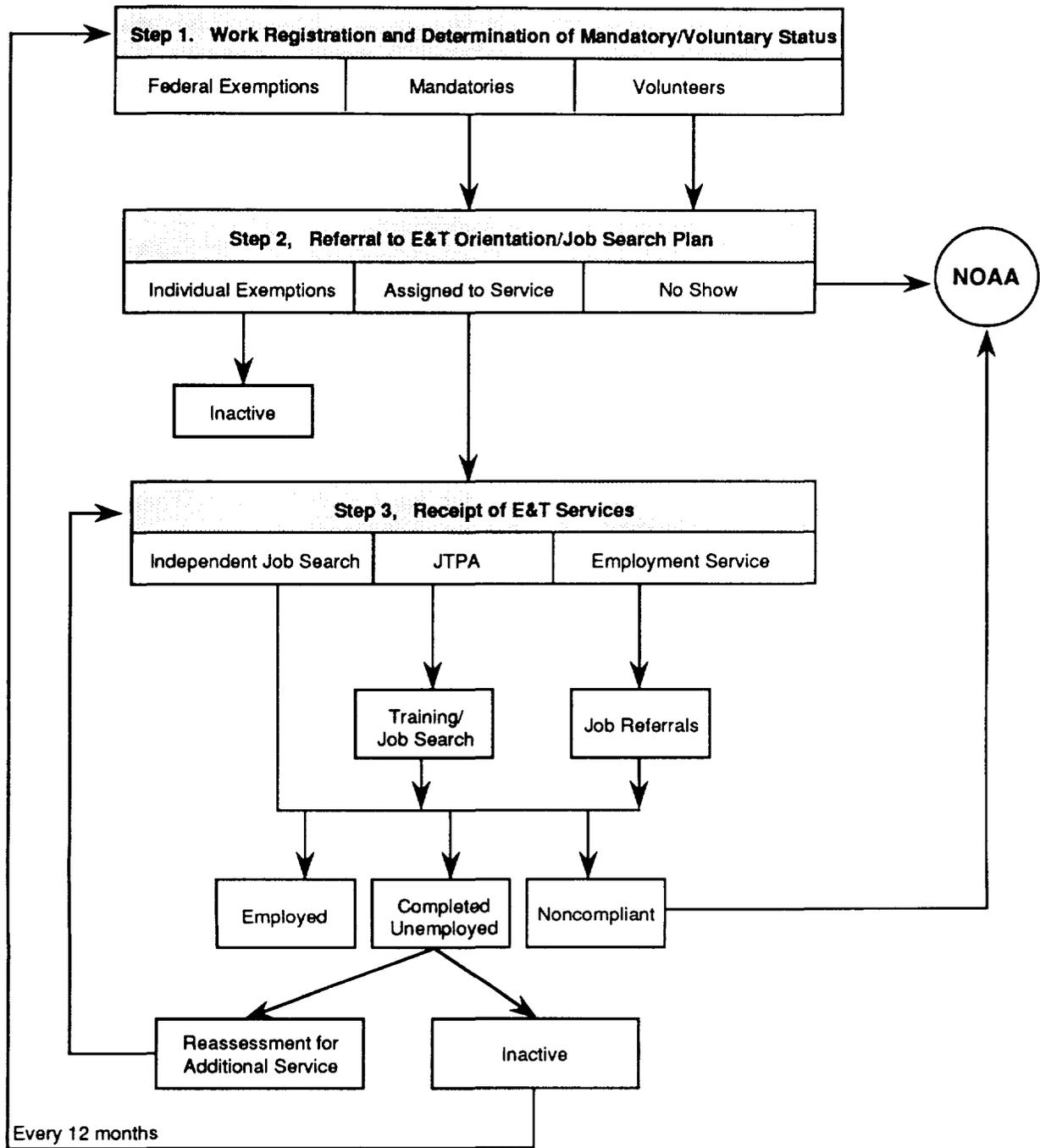


EXHIBIT 11-1 CLIENT FLOW: McCURTAIN COUNTY, OKLAHOMA

III. E&T SERVICE COMPONENTS

Services Required for Some or All Work Registrants

For mandatory nonexempt work registrants, participation is required in all components to which the E&T case worker refers the client, but no particular component or sequence of components is required of every participant.

The individual job search component in McCurtain County, monitored by the E&T case worker, requires participants to make 16 job contacts over an 8-week period. (According to state policy, these contacts can be made over either one 8-week period or two 4-week periods. In urban counties, 24 job contacts are required over the same period.) Job referrals may be made by the E&T worker; the participant is responsible for locating the remaining job leads. The E&T worker has two follow-up meetings with participants after their initial orientation interview, at 4 weeks and 8 weeks.

The JTPA service component offers career assessment and counseling, as well as on-the-job training and classroom training offered through the local vocational-technical and college extension schools. No service tracking of JTPA referrals occurs after verification that the participant completed and submitted a JTPA application.

On referral to the Employment Service component, E&T participants receive the same services available to all Oklahoma residents, including an orientation to help individuals complete the ES registration form, career counseling, and job placement services.

Additional Services That Can Be Requested by Mandatory Registrants or Volunteers

For mandatory nonexempt work registrants, all referrals made by the E&T case worker are considered mandatory components. Volunteers may participate in the same components.

IV. HOW COORDINATION/CONSOLIDATION AFFECTS THE OPERATION OF THE FOOD STAMP E&T PROGRAM

Consolidation Linkages

The E&T program operates as a separate and independent program in Oklahoma. The state DHS Family Support Services office administers both the JOBS program for AFDC recipients and the Food Stamp E&T program. However, at the local level, the JOBS program is administered by AFDC benefits case workers, while the Food Stamp E&T program is administered by a separate E&T case worker, who does not deal directly with the participants' Food Stamp benefits. Local Food Stamp E&T case workers are supervised either by a Food Stamp supervisor or by the JOBS supervisor in the local county DHS office, but otherwise operate independently of other agency programs.

The E&T program uses the statewide MIS for all Family Support Services programs under DHS, including AFDC and Food Stamp eligibility/benefits and work program participation. Information on individuals can be recalled by name, Social Security number, or other basic information. The system is linked to that of the Oklahoma Tax Commission and includes income data from OESC and Social Security records.

Service Coordination Linkages

There are no formal agreements between E&T and JTPA or the state Employment Service at either the state or local level. Coordination is dependent on individual staff relationships at the local level. Two of the E&T components consist of client referrals to the local offices of the JTPA system and the state Employment Service.

Financial Coordination Linkages

There are no financial agreements in connection with E&T referrals to JTPA or the state Employment Service.

Nonfinancial Coordination Linkages

Two of the three service components for the E&T program are provided through nonfinancial coordination linkages between the county welfare office and the JTPA and state Employment Service systems.

**FOOD STAMP EMPLOYMENT AND TRAINING PROGRAM DESCRIPTIVE PROFILE
ALLEGHENY COUNTY, PENNSYLVANIA**

Case Study Site: Allegheny County, Pennsylvania.

Name of Program: New Directions for Employment.

This is a consolidated statewide employment and training program for public assistance recipients in Pennsylvania that receives funding under both the federal Food Stamp Employment and Training (E&T)¹ program and the federal Job Opportunities and Basic Skills Training (JOBS) program for AFDC recipients.

The New Directions for Employment program adopted its present design and orientation as a result of a series of initiatives undertaken in 1987 by the governor and the state legislature, which identified individuals with serious employment barriers as a priority group for intensive employability development services and provided substantial state funds for this purpose.

State Agency Responsible for the E&T Program

Pennsylvania Department of Public Welfare, Office of Income Maintenance, Bureau of Employment and Training.

Local Agency Responsible for the E&T Program

Allegheny County Assistance Office (a local administrative unit of the Pennsylvania Department of Public Welfare).

¹ The Food Stamp E&T program in Pennsylvania will be referred to as E&T throughout this descriptive profile.

State and Local Roles and Responsibilities

The Food Stamp E&T program in Pennsylvania is state administered, with local program operations administered and staffed by state employees working out of County Assistance Offices. The state agency is responsible for statewide policy development, program design, and oversight of local operations.

In Allegheny County, nine County Assistance Offices manage work registration, E&T enrollment, and the delivery of E&T services to clients under the supervision of a countywide Employment Services coordinator.

Location of Program Responsibility Within Local FSA

Work registration and the enrollment of mandatory and voluntary participants in the New Directions enrollment pool are performed by cash assistance/eligibility workers.

Development of service plans and management of service delivery are performed by staff in a separate Employment Training Program (ETP) unit located in each County Assistance Office.

Types of Service Providers Used

The following agencies are involved in the delivery of E&T services either as in-house staff or through financial agreements or contracts with the state: (1) in-house staff from the ETP unit in each County Assistance Office, (2) Job Service staff collocated in each ETP unit to serve job-ready clients, and (3) JTPA service providers, local educational institutions, and community-based agencies funded to provide intensive services to hard-to-serve clients.

In addition, a variety of local educational institutions and JTPA providers serve E&T participants under nonfinancial coordination agreements.

State and Federal Funding

The statewide budget for Pennsylvania's Food Stamp E&T program in FY 91 totaled \$25.2 million (out of a total New Directions for Employment budget of \$60.5 million). Of the total Food Stamp E&T budget of \$25.2 million, the federal formula share accounted for \$3.5 million, and 50% federal/50% state funds for program expenditures totaled another \$18.0 million. Matched 50% federal/50% state funds for participant reimbursements of transportation and dependent care costs totaled \$1.0 million. Finally, the state contributed another \$2.7 million in 100% state-funded supportive service costs. Overall, \$13.0 million, or 51.6% of the total budget, was federally funded, while the state share accounted for \$12.2 million, or 48.4% of the total.

I. FOOD STAMP EMPLOYMENT AND TRAINING PROGRAM PARTICIPATION REQUIREMENTS

Mandatory Participants and Exemption Categories

Individuals receiving Food Stamps are subject to Food Stamp work registration/E&T participation requirements unless they are (1) exempt according to federal exemption criteria, e.g., those receiving Aid to Families with Dependent Children (AFDC) who are subject to requirements of the federal JOBS program, or (2) exempt according to state categorical or individual exemption criteria.

The Commonwealth of Pennsylvania has implemented E&T on a statewide basis with no categorical exemptions. Individual exemptions are available for homeless individuals, pregnant women in their second and third trimesters of pregnancy, VISTA volunteers, those on seasonal layoff expected to return to their jobs within 60 days, and those living more than 2 hours travel time from an employment and training site. However, the state has deliberately designed E&T participation requirements to include individuals with serious barriers to employment, since they want to reach hard-to-serve individuals with New Directions services. Thus, the state E&T plan for 1991 estimates that only 5% of all E&T work registrants will receive state exemptions.

Participant Volume and Extent of Participation by Volunteers

At any one time, Allegheny County has about 12,000 Food Stamp E&T registrants in the New Directions enrollment pool, which accounts for about 15% of the statewide total. Participation by volunteers (those exempt from work registration requirements) is limited. February 1991 statistics showed that volunteers made up 6% of the statewide E&T enrollment pool and 4% of the enrollment pool in Allegheny County.

Description of Sanctioning Procedures

Although a high percentage of all work registrants are required to enroll in the Food Stamp E&T program as mandatory participants, active participation in services is usually limited to two groups: (1) enrollees assessed as job ready (roughly 10% of the total enrollment pool), who are required to participate in an 8-week job search component administered by the state Job Service, and (2) enrollees assessed as not yet job ready who request education and training services from the ETP unit in each county assistance office. Not yet job-ready enrollees who do not initiate requests for services from the New Directions program are not usually required to participate in the program.

Procedures are in place to report mandatory E&T enrollees who refuse to participate without good cause. For example, the Job Service staff working with job-ready E&T clients make a report to the financial case workers if a mandatory registrant fails to keep two consecutive call-in appointments or refuses to cooperate with job referrals. Workers in the ETP units also report E&T enrollees who refuse to participate. However, because the E&T case workers emphasize client initiation of services, such instances are rare. The state plan estimates that only 3% of all mandatory work registrants will be sanctioned for failure to cooperate during FY 91.

II. CLIENT TARGETING POLICIES AND CLIENT FLOW SEQUENCE

Client Targeting Policies

The Pennsylvania New Directions for Employment program targets two distinct groups within the mandatory enrollment pool. First, the program targets those who are assessed as "job ready"--individuals with recent work history and without any obvious employment barriers who are interested in obtaining assistance in finding a new job. These individuals are referred to Job Service staff collocated in the local welfare offices for mandatory participation in a standardized 8-week job search component that includes individual job referrals and individual or group job search training. However, although they make up a high percentage of all reported service placements for the E&T program, these individuals consume less than 10% of the E&T program's total resources and average only slightly over \$100 in program costs per reported service entry.

The second target group for New Directions for Employment is individuals who are not yet ready for job placement but who are interested in volunteering for a planned program of education, training, and supportive services that will prepare them for stable employment in the future. These not yet job-ready participants may receive services through one of three distinct service options: (1) client-initiated training plans using community resources, (2) training and employability plans developed with the assistance of the ETP case worker involving referral to existing training programs, and (3) ETP referral to specially funded comprehensive service projects targeted to hard-to-serve public assistance recipients.

The first two service options for individuals who are not yet job ready use nonfinancial coordination linkages with available community education and training services to pay for the education and training services for E&T clients. As a result, the average cost to the E&T program (for the operation of the in-house ETP units providing service planning, service referrals, and case management) is only around \$300 to \$400 per participant. The third option, which consumes over half of the total Food Stamp E&T program

resources, uses E&T funds averaging \$2,500 per participant to pay outside providers for the design and delivery of intensive services for hard-to-serve individuals. For example, one of the programs funded for hard-to-serve clients is targeted to recipients of time-limited General Assistance who also have limited English fluency, read below the 7th grade level, lack a recent employment history, have emotional or mental health problems, are homeless, or have another serious employment barrier.

Client Flow and Service Sequencing

Rather than dictating a prescribed set of services for all mandatory E&T work registrants, the New Directions for Employment program has created procedures to provide individualized placement assistance to the most job ready and give intensive education and training services to the most motivated among the less job ready.

Exhibit 12-1 summarizes the flow of Food Stamp E&T clients through the different service options:

- During Step 1, mandatory nonexempt participants and volunteers are registered for work by financial eligibility case workers.
- During Step 2, these individuals are entered into the database that comprises the New Directions enrollment pool. Enrollment in the New Directions program does not constitute active participation in E&T services.
- During Step 3, a subset of E&T enrollees are referred to active service options.

Individuals identified as job ready by the eligibility worker at intake are referred to the Job Service worker assigned to each ETP unit for job referrals and job search training services. Participation in the Job Service job search component lasts a maximum of 8 weeks or until employment is obtained. Job-ready participants still receiving Food Stamps must repeat the job search component once a year at the time of eligibility recertification.

Individuals identified as not yet job ready are referred to the ETP unit, where they are invited to request assistance in developing employment

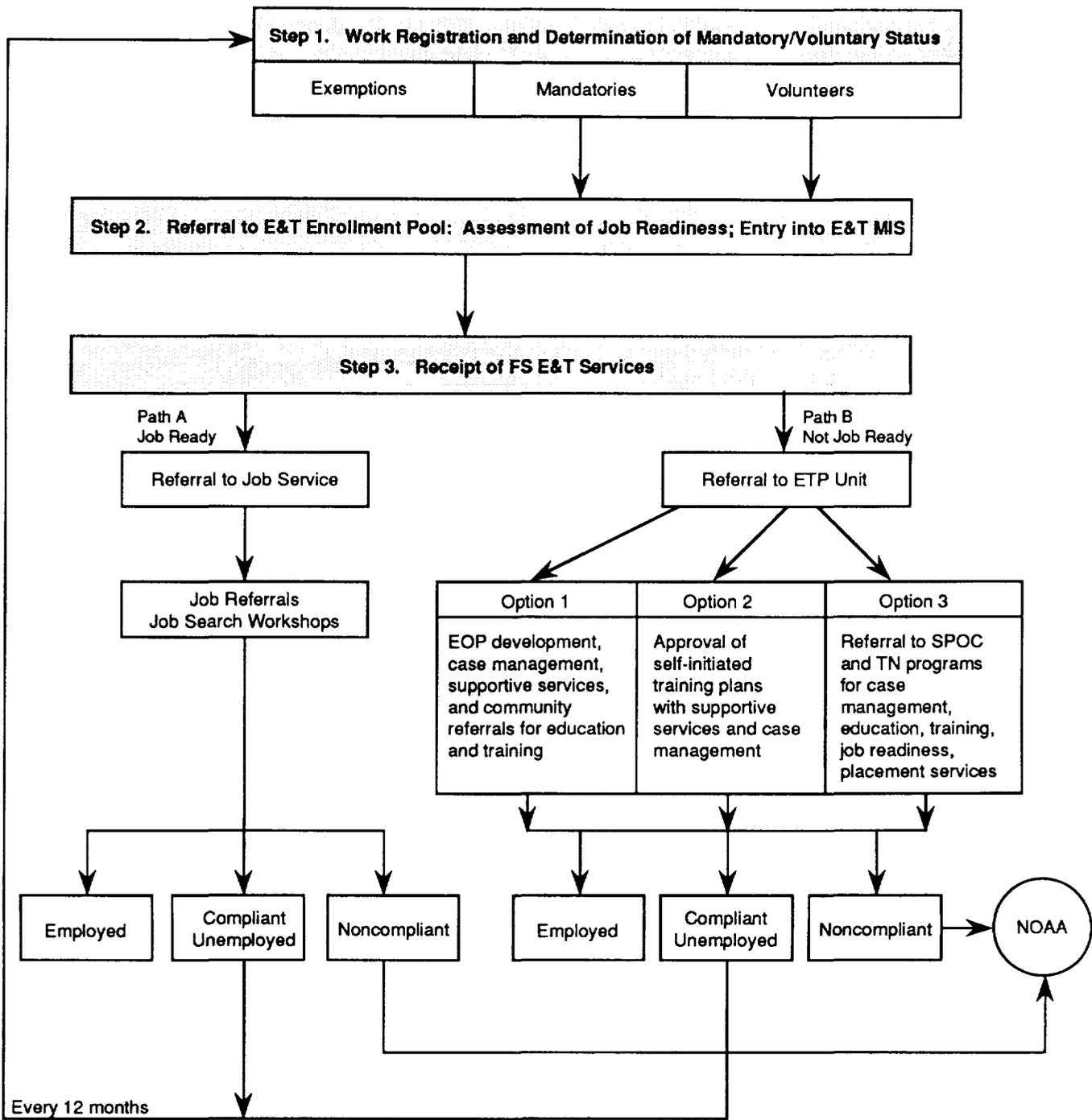


EXHIBIT 12-1 CLIENT FLOW: ALLEGHENY COUNTY, PENNSYLVANIA

the Food Stamp program while they are participating in E&T services may complete a training program for which the tuition has already been paid.

III. E&T SERVICE COMPONENTS

Services Required for Some or All Work Registrants

Although a high percentage of Food Stamp E&T enrollees are classified as mandatory work registrants, as described above, the only required service is the job search component administered by the Job Service for individuals assessed as job ready. All other services are offered to individuals in the Food Stamp enrollment pool, who are invited to request education, training, and supportive services from the ETP unit in the welfare office if they are interested.

Job-ready participants (about 10% of the E&T enrollment pool) are referred to the Job Service worker assigned to the ETP unit in each welfare office. After referral, a participant is called in for an initial face-to-face meeting with the Job Service worker. At this meeting, the Job Service worker reviews the participant's work history, assesses job skills and interests, and identifies appropriate job referrals. The worker is required to give the participant three job referrals at the initial meeting and three additional referrals every 2 weeks, for a total of at least 12 referrals over an 8-week period.

If not enough appropriate referrals can be made, the Job Service worker is required to provide group or individual job readiness or job search services covering interviewing skills, career opportunities, resume preparation, and techniques for finding job openings, so that the participant will be involved in at least 12 hours of job-readiness/job-seeking activities per month. As part of participation in the Job Service job search component, clients are counseled about the availability of supportive service allowances from the welfare department for child care, transportation, and other training costs.

If mandatory participants fail to report for two interviews without good cause or refuse to cooperate, their noncompliance is reported to the financial case worker in the welfare office. If individuals are found to be inappropriately referred, the Job Service worker refers them back to the ETP case workers. Participation in the 8-week Job Service component must be repeated by job-ready clients once a year at the time of Food Stamp eligibility recertification.

Participation in the Job Service job search component is estimated to account for about half of all service placements reported for the Food Stamp E&T program in Pennsylvania.

Additional Services That Can Be Requested by Mandatory Registrants or Volunteers

Additional service components available to interested mandatory and voluntary E&T enrollees include education and vocational services, as well as projects that package several types of services in a single comprehensive service package. Educational services available to E&T participants include English as a second language (ESL) training, adult basic education (ABE)/literacy services, GED preparation/high school remediation, and advanced degree programs. In Allegheny County, educational services account for approximately 20% of all voluntary service placements, with GED preparation/high school remediation as the largest category of educational service placements.

Vocational services available to E&T participants include on-the-job training, classroom training in vocational skills, Community Work Experience Program (CWEP) training, paid work experience, and job readiness training. In Allegheny County, vocational services account for approximately 70% of all voluntary service placements. Most of these placements are for classroom training in vocational skills.

Each type of service is provided to E&T participants by a variety of local service providers, including local educational institutions,

community-based organizations, and the local JTPA service system and its contracted providers. The majority of E&T participants receiving educational and vocational services are served through referrals to existing community education and training programs at no cost to the Department of Public Welfare, as part of employability and service plans developed by ETP workers for their clients (Options 1 and 2 from Section II). These participants receive ongoing case management from ETP workers and are eligible for supportive service allowances from the Department of Public Welfare for child care, transportation, and other training expenses. Although participation in these services is usually initiated by the participant, mandatory registrants are theoretically subject to sanctions for failure to carry through with the selected services without good cause.

In addition, comprehensive service packages are provided to smaller numbers of E&T participants referred by ETP workers to special projects funded by the state Department of Public Welfare to provide intensive and comprehensive services to hard-to-serve public assistance recipients. By state policy, participation in these special projects is completely voluntary (not subject to any sanctioning process). Once accepted into a TN or SPOC project, the responsibility for ongoing client counseling, case management, and arrangement for supportive services belongs to the special project. Although these special projects serve a relatively small percentage of E&T participants, they consume over half of the total Food Stamp E&T program resources. They are operated by a variety of outside service providers selected by the state to design and deliver intensive services to hard-to-serve individuals.

The services included in TN service packages combine basic skills remediation with job training or work experience, plus intensive case management and counseling, and preemployment training and job search assistance. Individual clients participate in TN projects for 6 to 9 months. The SPOC program develops individualized comprehensive education and training service packages for its enrollees that can last up to 2 years.

IV. HOW COORDINATION/CONSOLIDATION AFFECTS THE OPERATION OF THE FOOD STAMP E&T PROGRAM

Consolidation Linkages

The State of Pennsylvania has fully consolidated the design and operation of the Food Stamp E&T program for recipients of General Assistance and Food Stamp only benefits with the JOBS program for AFDC recipients. This consolidation has made it possible for the state to implement a consistent policy across both programs emphasizing the delivery of intensive services to those with serious employment barriers. Although there is no overlap in client eligibility for the two programs, consolidated program design and operations have made possible:

- Strong state policy and financial support for the delivery of intensive services to improve the employability of state residents who are economically dependent on public assistance benefits.
- Simplified state administration and local operations of a single integrated program rather than the administration of two (or three) distinct programs: one for AFDC recipients, one for GA recipients, and one for Food Stamp only recipients.
- Simplified coordination between the state's consolidated New Directions for Employment program and other state and local employment and training resources and programs rather than the development of coordination linkages for each work program separately.

Service Coordination Linkages

In addition to consolidation with the federal JOBS program, the Food Stamp E&T program in Allegheny County emphasizes building linkages to local education and training providers, rather than delivering all services with in-house staff. This emphasis has been established at the state level and is communicated to local county programs through state contracting arrangements for financial linkages and required program procedures for nonfinancial linkages.

Financial Coordination Linkages

Some of these service coordination linkages involve the formal purchase of services from outside providers using interagency agreements and/or service contracts. Outside contractors in Allegheny County include:

- The state Job Service for delivery of job search assistance to job-ready E&T enrollees, which accounted for 8% of the Food Stamp E&T 1991 budget at the state level.
- The local JTPA service delivery area (SDA) for administration of comprehensive services to hard-to-serve public assistance clients under the SPOC program, which accounted for 19% of the Food Stamp E&T budget statewide.
- One educational institution and two community-based organizations for delivery of comprehensive services targeted to time-limited GA recipients under the TN program, which accounted for 32% of the Food Stamp E&T budget statewide.

These purchase-of-service agreements are negotiated at the state level using a combination of 50% state/federal funds and some 100% state funds for supportive services. They have enabled the Department of Public Welfare to develop specialized curricula oriented to the special needs of particular target groups, and to build on Job Service expertise in job development/ placement functions without duplication of effort.

Nonfinancial Coordination Linkages

Other service coordination linkages involve the referral of E&T clients to existing community education and training programs at no cost to the Department of Public Welfare. Referrals are made to local vocational technical schools, community colleges, adult basic education programs in local schools, and the local JTPA service system for economically disadvantaged individuals and dislocated workers. Nonfinancial service linkages account for the majority of E&T service placements.

These nonfinancial referral linkages have clearly expanded the range and intensity of services available to E&T participants within the budget constraints of the program, and have given program participants the opportunity to put together individualized service plans drawing on a wide variety of educational and vocational service providers.

**FOOD STAMP EMPLOYMENT AND TRAINING PROGRAM DESCRIPTIVE PROFILE
CAMPBELL COUNTY, TENNESSEE**

Case Study Site: City of La Follette, Campbell County, Tennessee.

Name of Program: Food Stamp Victory Program.

This Food Stamp Employment and Training (E&T)¹ program is a state-supervised, locally administered program. It is one of two programs serving Food Stamp recipients. The other program, Job Opportunities and Basic Skills Training Program (JOBS), provides education and training for individuals receiving AFDC, with or without Food Stamp benefits.

State Agency Responsible for the E&T Program

Tennessee Department of Human Services, Division of Family Assistance, JOBS Unit.

Local Agency Responsible for the E&T Program

Through a statewide contract with the Department of Human Services (DHS), the Tennessee Department of Employment Security (DES) operates local programs in 45 counties, including Knox and Hamilton, where the DES Victory staff is collocated with DHS staff in the DHS offices. The City of La Follette DES operates the Victory program in Campbell County. After the site visit for this study was conducted, the E&T program in Campbell County was terminated because of the high unemployment rate and low volume of work registrants.

¹ The Food Stamp Employment and Training program in Tennessee will be referred to as "E&T" throughout this descriptive profile.

State and Local Roles and Responsibilities

The Tennessee Department of Human Services determines statewide work registration/exemption policies, allocates Victory funds to local programs, develops the Victory plan for all local areas to follow, and monitors local programs.

Local DHS offices conduct eligibility assessments and determine participants' status (mandatory work registrant or exempt), refer mandatory and voluntary clients to the Victory program operated by the La Follette DES, and initiate the sanctioning/conciliation process.

The La Follette DES office operates the Victory program in Campbell County. It coordinates the Victory program by conducting an initial assessment and employment/training plan for Victory clients, supervising the independent employment search component, authorizing travel allowances, referring clients to providers for training components, tracking client progress, and referring to the local DHS office clients who do not comply with Victory requirements.

Location of Program Responsibility Within Local FSA

Case workers at the Campbell County DHS office conduct all client intake, update, review, and referral processes, from initial application to case closure. Case workers manage clients for all programs administered by DHS, which, in addition to Victory, include AFDC, JOBS, and Medicaid. Using criteria established by the state, case workers determine whether a client is a mandatory Victory participant (work registrant) or is exempt from work registration. Case workers refer clients to the local DES for work registration/Victory participation. They also receive notices of noncompliance from the local DES offices and initiate the sanctioning process. Case workers work with clients to determine whether good cause exists, and they conduct conciliation efforts to determine clients' status as Food Stamp recipients. Case workers also implement sanction procedures and close case files.

La Follette Department of Employment Security has one interviewer who devotes 40% of his time to coordinating the Victory program. He conducts the initial assessment of Victory clients, supervises the individual employment search component, refers clients to other providers for training components, tracks client progress, and refers clients back to the local DHS office if (1) they are exempt or (2) they fail to keep appointments or to remain active as defined by state Victory guidelines.

Types of Service Providers Used

The service provider in Campbell County is La Follette's Department of Employment Security, which operates the independent job search component. A few Victory clients were also referred to other providers, whose services are provided either at no cost or low cost to participants. Providers include local adult basic education programs, the local vocational school, and the Private Industry Council overseeing JTPA services.

State and Federal Funding

Tennessee's statewide budget for the FY 91 Victory program totaled \$2,180,278. Federal formula funds accounted for \$1,870,060, and 50% state/50% federal funds amounted to \$310,202. The latter amount includes a transportation budget of \$200,000 and a dependent care budget of \$110,202. In all, the federal contribution from Department of Agriculture Food Stamp Employment and Training funds accounted for 93% of the state's Victory program allocations, and the state contributed 7% of its own resources.

Campbell County's portion of Victory funds pays for 10% of one DES staffer's time to coordinate the program and supervise independent job search. In addition, the funds pay up to \$50 per participant, per year, for transportation expenses during the independent job search component. According to the state plan, \$160 per year is also available to participants who need dependent care while participating in Victory programs.

Tennessee's plan expects the cost per participant during the independent job search component to be \$69.75. Campbell County staff report that the actual figure is significantly lower, probably half of the state's estimate.

I. FOOD STAMP EMPLOYMENT AND TRAINING PROGRAM PARTICIPATION REQUIREMENTS

Mandatory Participants and Exemption Categories

Federal policies exempt AFDC recipients participating in other public assistance work programs from E&T participation. In Tennessee, all AFDC recipients are eligible to volunteer for the JOBS program, which emphasizes basic skills and vocational instruction for AFDC recipients. This provision eliminates approximately 41% of all Food Stamp recipients in the state (according to a survey of Food Stamp recipients conducted in Tennessee in 1986).

During FY 91, Tennessee's exemption categories were projected to apply to 37% of all mandatory work registrants. Two levels of exemption were implemented in Tennessee: categorical and individual. Tennessee requested and received categorical exemptions for 50 out of 95 counties. Exemptions were granted for several reasons, including (1) the small number of people who would benefit from the program (most exempted counties had fewer than 200 potential participants); (2) many of these counties had no DES office from which to provide services; and (3) high unemployment and worker dislocation in several counties. The resulting categorical exemptions were projected to affect approximately 14% of mandatory work registrants.

In addition to the federal exemption criteria, the state specified individual exemptions, which include (1) those having inadequate transportation, (2) those temporarily incapacitated, (3) those who are on call-back to a job, and (4) those experiencing an "unanticipated emergency." State DHS staff projected that individual exemptions would apply to 24% of mandatory work registrants.

In Campbell County, where there is no public transportation, individual exemptions for lack of transportation are common, and the northern section of the county is exempt because of its remoteness. Exemptions due to inadequate transportation accounted for 39% of all exemption categories.

Participant Volume and Extent of Participation by Volunteers

According to the FY 91 plan, Tennessee expected to make a total of 28,650 placements in the Victory program, including 26,616 mandatory work registrants and 585 volunteers. Between October 1990 and May 1991, a total of 20,886 mandatory clients enrolled in Victory components (78% of planned enrollments), and 538 voluntary clients enrolled in Victory components (92% of planned enrollments).

In Campbell County, 238 Food Stamp clients participated in the Victory program; 1 of the 238 was a volunteer. Of these participants, 228 enrolled in the individual job search component, and 10 enrolled in the education component (GED/ABE). Another 9 participants referred to the Victory program were directly placed by DES staff, and 36 clients obtained their own jobs.

Description of Sanctioning Procedures

The Victory coordinator at the La Follette DES office initiates sanctioning procedures by sending a notice to the client's DHS case worker that she/he failed to either (1) keep an appointment for the Victory assessment or (2) complete the individual employment search component. The DHS case worker is then responsible for sending a notice of sanctioning procedures to the client. Case workers determine whether clients' circumstances qualify as "good cause." Food Stamp recipients who are judged to have no good cause for noncompliance are allowed to cure sanctions by completing whatever task was required of them when sanctions were initiated (e.g., enrolling in a service component).

II. CLIENT TARGETING POLICIES AND CLIENT FLOW SEQUENCE

Client Targeting Policies

Tennessee's client targeting policies are broad. All Food Stamp clients who are not enrolled in AFDC or JOBS and are not receiving UI are targeted for the Victory program. Within this group, the state targets (1) clients with access to transportation; (2) clients who are not temporarily incapacitated (e.g., recent surgery, broken limb, contagious illness); (3) those not on call-back to work, who have been laid off more than 90 days; (4) those who are not in the middle of a crisis or an emergency (e.g., death in family, car problems, "disasters"). Clients who have a temporary barrier to participation may be exempted from participation for a specified time and later required to enroll in Victory.

Client Flow and Service Sequencing

Throughout Tennessee, Victory participants may select the program components in which they wish to participate. Further, clients may move from one component to another, linking training with job search options. Clients undergoing training are, in general, exempt from participating in individual employment searches (although they are urged to obtain part-time employment).

Exhibit 13-1 outlines the client flow for E&T participants in Campbell County. Once clients are referred to the La Follette DES for assessment, the Victory coordinator reviews their work history, education, and skills, and covers the services available through the Victory program. According to the Victory plan, clients who are illiterate or whose reading ability is below the 10th-grade level are encouraged to enroll in a local ABE or literacy program (unless they have the potential to make at least \$4/hour without such training). The Victory coordinator may also refer clients to JTPA programs and to vocational training through the local Vocational/Technical School.

Clients entering training components are referred to the other agencies conducting the instruction. They are not required to participate in any

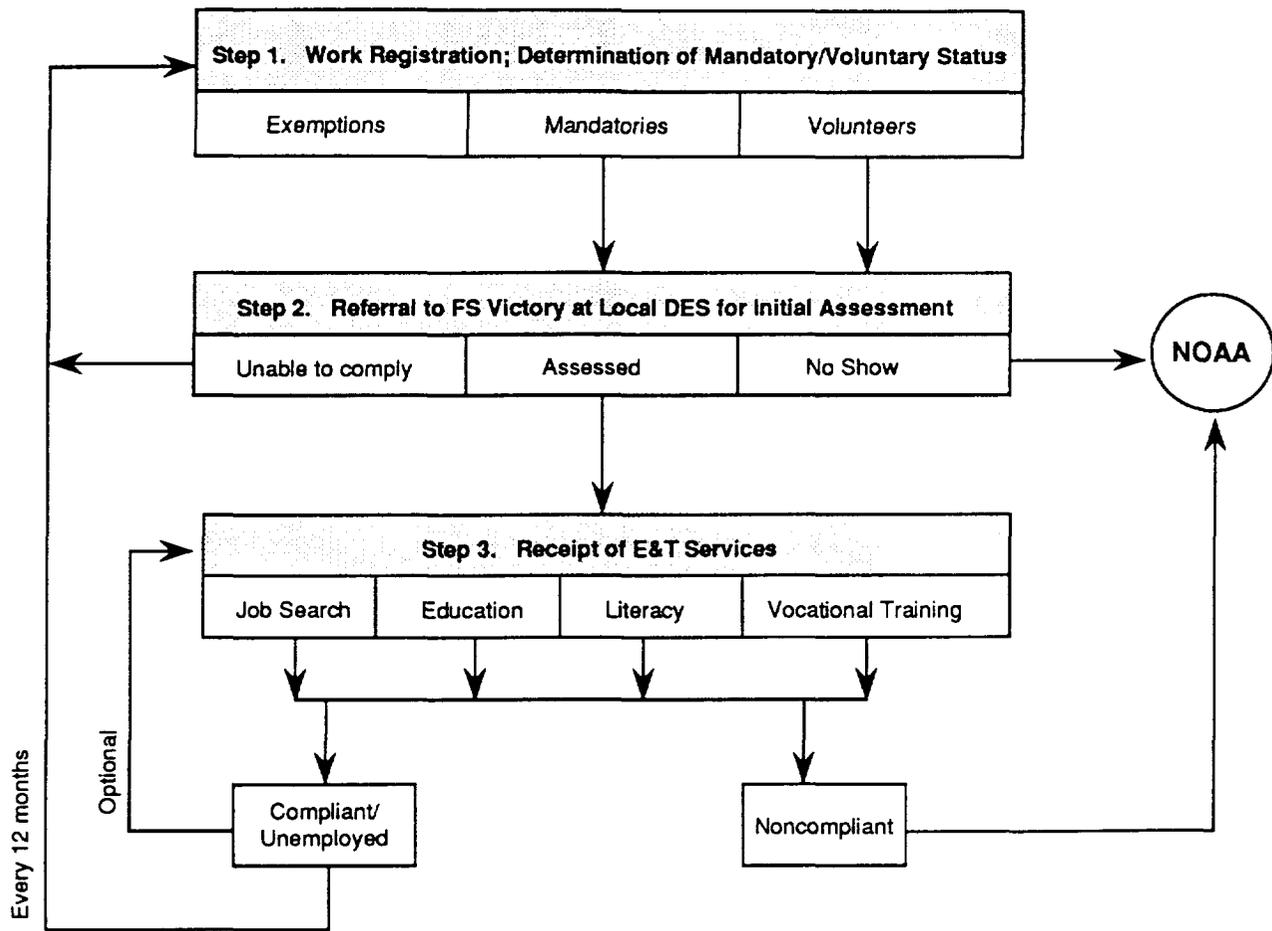


EXHIBIT 13-1 CLIENT FLOW: CAMPBELL COUNTY, TENNESSEE

further component as long as they participate at the minimum levels outlined by the state DHS.

Clients selecting the individual employment search component are required to contact 24 employers over 2 months (12/month). The Victory coordinator at DES supervises the employer contacts, meeting with clients at the end of weeks 4 and 8 to review and validate the contacts, as well as to review any job postings that may be of interest to clients. During the job search component in Campbell County, clients may receive \$24 for each month of participation (\$48 total).

In Campbell County, once clients have enrolled in a training program or have completed their required 24 job contacts, they have fulfilled their work registration requirement through Victory. They may opt to receive further training, in which case they will be referred to another provider if necessary. However, once they finish a mandatory component, they do not have to enter into any further training/job search until the next 12-month period.

III. E&T SERVICE COMPONENTS

Services Required for Some or All Work Registrants

The Tennessee Victory program is flexible enough that clients may, within some guidelines, create fully individual training programs. Participants who have completed less than 10th grade are required to enroll in either the education or literacy component, unless free instruction is unavailable. Participants may also be excused from mandatory education if they demonstrate that they can obtain employment at \$4/hour or more. Once they have satisfactorily participated in this component, they do not have to enroll in individual job search, although they may ask for further referrals to vocational training providers, such as the area Vocational/Technical School or the local JTPA program. However, if training providers are limited, individual job search may be the only option available to clients.

While participating in the Victory program, clients are eligible for supportive services of up to \$160/month for dependent care and \$25/month for such things as transportation or work tools. These expenses are paid from Victory funds only if other agencies are not able to provide supportive services.

Additional Services That Can Be Requested by Mandatory Registrants or Volunteers

Both mandatory and voluntary Victory participants may request enrollment in additional components at any point in the Victory program, as long as they have completed one component or have arranged to be reassigned into another component.

IV. HOW COORDINATION CONSOLIDATION AFFECTS THE OPERATION OF THE FOOD STAMP E&T PROGRAM

Consolidation Linkages

The state administration and oversight of the Victory program and the JOBS program are consolidated, and, at the local level, case workers handle both Victory and JOBS clients. But this is as far as the consolidation goes. Two separate statewide contracts were developed for the JOBS and Victory programs: the State Department of Labor, through JTPA, operates the JOBS programs at the local level; the Department of Employment Security operates the Victory program at the local level. State DHS staff treat JOBS and Victory clients differently, largely because they perceive JOBS clients to need more intensive services and training, and more motivation.

Service Coordination Linkages

In Campbell County, 10 out of the 238 participants enrolled in GED/ABE programs offered through local adult schools and the local Private Industry Council (JTPA). Coordination between these providers and the Victory program

is strictly nonfinancial, conducted through referrals to the different agencies. No other financial agreements have been developed in Campbell County.

A Victory Council meets monthly to discuss aspects of both the JOBS and Victory programs. Staff from the Campbell County DHS, La Follette DES, area educational agencies, and community-based organizations attend the quarterly meeting. Most other coordination remains informal. The small-town atmosphere lends itself easily to frequent discussions among agency administrators. Staff of the concerned agencies know the general situation of other agencies (for instance, whether programs are overcrowded or whether they have room for new participants).

These coordination linkages are too general to develop effective service coordination among agencies. Client services are developed by each individual agency without much communication with, for instance, the referring agency or the agency responsible for tracking clients. As a result, the continuity of client services suffers.

**FOOD STAMP EMPLOYMENT AND TRAINING PROGRAM DESCRIPTIVE PROFILE
GALVESTON COUNTY, TEXAS**

Case Study Site: Galveston County, Texas.

Name of Program: Food Stamp Employment and Training.

The Food Stamp Employment and Training (E&T)¹ program in Texas is administered at the state level by the Texas Department of Human Services (DHS). The E&T program serves individuals receiving only Food Stamp benefits who are subject to work registration. Food Stamp recipients also receiving AFDC benefits are subject to the JOBS work program, which is operated separately from E&T.

State Agency Responsible for the E&T Program

Texas Department of Human Services, Client Self-Support Services--
Program Policy Division, Employment Services Unit.

DHS has contracted with the Texas Employment Commission (TEC) to provide E&T program services in 53 counties and the Texas Association of Private Industry Councils (TAPIC) to provide services to an additional 3 counties.

Local Agency Responsible for the E&T Program

Texas Employment Commission offices in Texas City and Galveston under a statewide contract between the Department of Human Services and the TEC.

¹ The Food Stamp Employment and Training program in Texas will be referred to as "E&T" throughout this descriptive profile.

State and Local Roles and Responsibilities

Food Stamp E&T in Texas is state administered. State DHS staff determine which counties will provide E&T services, which agency in each county will be contracted to provide services, and the content and sequence of E&T components. DHS state staff monitor contracted service providers and provide technical assistance and training as needed. A state-level TEC program coordinator and field liaison staff also oversee the provision of E&T services in local TEC offices.

In Galveston County, the local DHS office identifies mandatory E&T work ~~registrants through the eligibility intake and recertification process and~~

Types of Service Providers Used

The local office of TEC in Galveston County operates orientation and provides job search services under a financial agreement between the state DHS and the state TEC. TEC case workers also make referrals to education and training services, which are provided through nonfinancial coordination linkages. Providers of education and training include Galveston Community College, the local public school system, and the local JTPA contractor, SER, a community-based organization.

State and Federal Funding

Texas' statewide budget for the E&T program in FY 91 totaled \$13.4 million. Of the total budget, federal formula funds accounted for \$6.9 million and 50% state/50% federal funds for program operations totaled \$2.6 million. Transportation and dependent care costs were budgeted at \$3.9 million (also shared 50% state/50% federal). Overall, 76% of the budget was federally funded from Department of Agriculture Food Stamp E&T funds.

According to the state plan, the component cost per placement for job search is \$66.24 and for job search training (not provided in Galveston County) \$128.20. Supportive service payments are prorated on the basis of actual participation required by the specific component assignment. For example, participants in job search are advanced \$24 to complete 24 employer contacts, while individuals participating in educational activities may receive up to \$25 based on the number of classes attended during a month.

I. FOOD STAMP EMPLOYMENT AND TRAINING PROGRAM PARTICIPATION REQUIREMENTS

Mandatory Participants and Exemption Categories

In PY 91, Texas claimed categorical exemptions for registrants in 198 counties because of geographic remoteness. As a result, 23.5% of the state's work registrants were categorically exempt.

DHS eligibility workers also implement individual exemptions for the following reasons: physical or mental disability, lack of transportation, lack of child care, remoteness, following the work stream (migrant workers), and language barriers. According to the FY 91 state plan, individual exemptions were projected to be applied to 2.2% of the work registrant population. Starting in May 1991, the state implemented a new criterion for individual exemptions: those with less than an eighth-grade education and no skills training who have not worked full time for 6 of the past 12 months. This exemption is expected to apply to an additional 10% to 15% of the work registrant caseload.

Participant Volume and Extent of Participation by Volunteers

In the 56 counties offering E&T services, exempt Food Stamp-only recipients are not permitted to volunteer for contracted E&T services. However, they may volunteer for services through a nonfinancial agreement with the state agency administering JTPA. Although they do not receive services funded by E&T, they are reported by the state as E&T placements and identified through matching data tapes of Food Stamp-only recipients and JTPA participants enrolled in JTPA in the 56 counties operating E&T services. These data tape "matches" are reported as E&T participants in two categories, JTPA mandatory and JTPA volunteer. JTPA mandatorics are mandatory work registrants participating in JTPA services, and JTPA volunteers are exempt E&T participants receiving JTPA services.

Galveston County E&T participation data from the E&T tracking system for the period October 1, 1990, through June 1991 indicated the following service component placements:

Job search	1,091	(96.0%)
Vocational training	4	(0.3%)
Education	42	(3.7%)

The JTPA data tape "matches" for Galveston County for the period October 1, 1990, through June 1991 indicated 885 JTPA placements, including 123 mandatory and 762 voluntary matches that are reported by the state to FNS as additional E&T placements.

Description of Sanctioning Procedures

Mandatory nonexempt work registrants are subject to sanctioning at a number of different points in the client flow process. Clients who fail to respond to two orientation notices or the job search follow-up interview are noncompliant. TEC counselors inform DHS of noncompliance through an inter-agency communication form. DHS is then responsible for issuing the NOAA. TEC workers are responsible for curing sanctioned participants who want to reenter the program.

In Galveston County, 1,226 registrants were issued NOAAs for the period October 1, 1990, through June 1991. During this same time, 198 cures were authorized.

II. CLIENT TARGETING POLICIES AND CLIENT FLOW SEQUENCE

Client Targeting Policies

In May 1991, Texas instituted client targeting priorities through procedures established to exclude from E&T participation the least employable work registrants, those with less than an eighth-grade education and no skills training, who have not worked full time for 6 of the past 12 months. Statewide, this new individual exemption criterion has resulted in approximately 10% to 15% of the 30,000 monthly referrals being excluded from participation.

Additionally, in the 56 counties operating E&T, volunteers are not allowed to participate in services funded by the E&T program.

By concentrating E&T resources in 56 counties, the state is attempting to provide more intensive services to E&T participants and operate the program with greater cost efficiency. The new exemption for those hardest to serve reflects the state's recognition that these individuals require more intensive services than the E&T program resources can provide.

Client Flow and Service Sequencing

Exhibit 14-1 details the client flow through Galveston County's E&T program. Step 1 is work registration that occurs at DHS before the client is referred to TEC. Step 2 begins with referral of the mandatory work registrant to TEC and orientation. Step 3 involves receipt of E&T services--job search, education, or vocational training.

Mandatory E&T participants are required to complete one program component to fulfill their E&T program obligation for the year. Participants choosing education or vocational training as a first component may opt to participate in job search on component completion. Although technically volunteers in job search, these participants are considered mandatory participants for data collection purposes.

III. E&T SERVICE COMPONENTS

Texas' E&T component options described in the State Plan include directed job search, job search training, vocational training, education, work experience, and refugee services. Galveston County offers directed job search, vocational training, and education services to E&T participants.

Services Required for Some or All Work Registrants

All mandatory work registrants are required to attend an orientation session and to complete one service component each year. Mandatory participants interested in education and training services may choose these program options over job search (and fulfill their E&T program obligations for the year). However, participants who fail to complete these options are reassigned to job search.

Job search participants (who represent 96% of actual placements in Galveston) are required to make 24 in-person employer contacts in a 1-month period and to provide documentation of job search contacts in a face-to-face

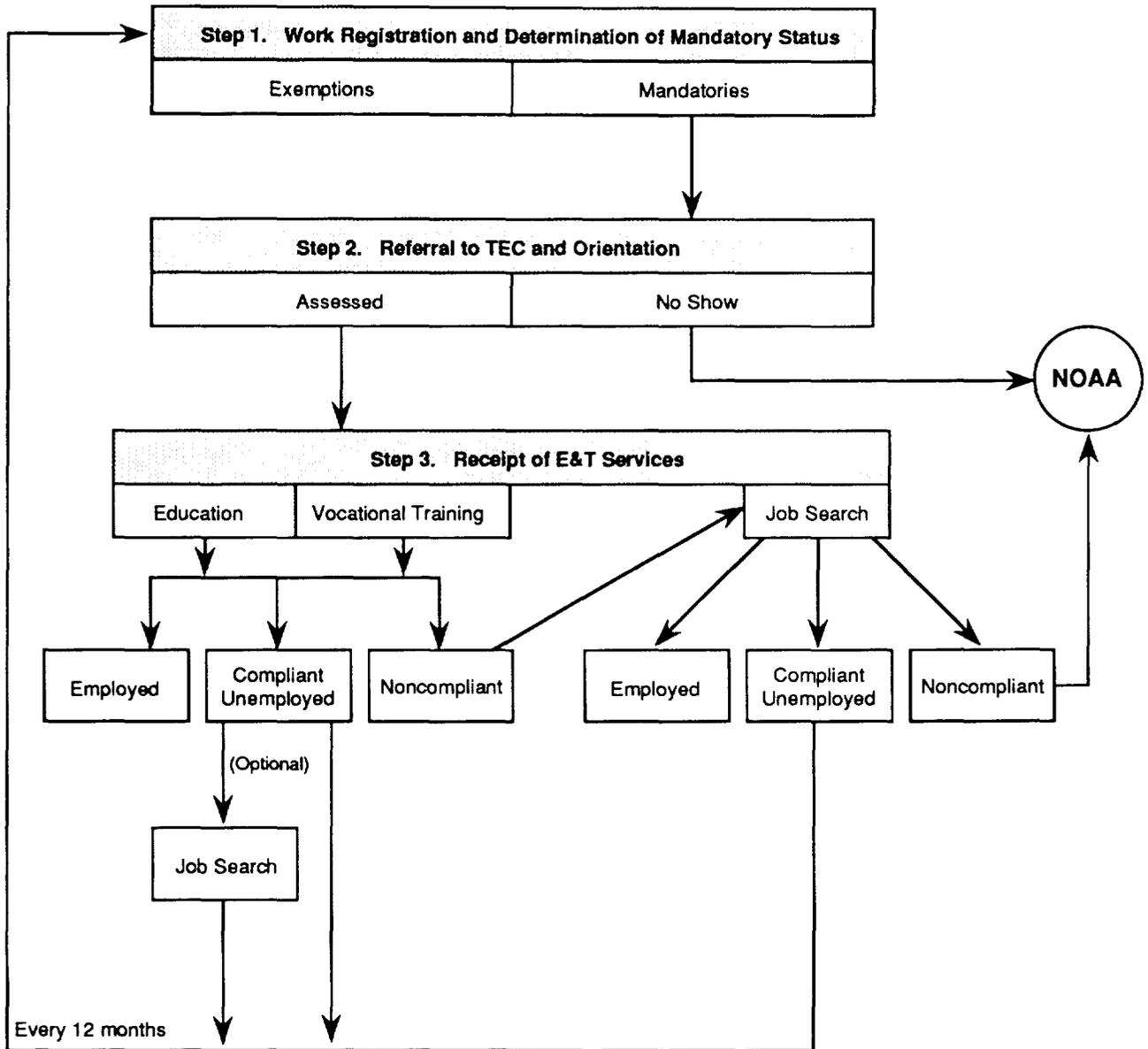


EXHIBIT 14-1 CLIENT FLOW: GALVESTON COUNTY, TEXAS

session with a TEC case worker at the conclusion of the job search period. TEC also provides job referrals for individuals through a computerized process that matches TEC job listings to data on client work histories and job skills.

Additional Services That Can Be Requested by Mandatory Registrants or Volunteers

In the 56 counties operating E&T in Texas, volunteers are not allowed to participate in E&T-funded services. Participants opting for education or vocational training services as a first program component may volunteer for job search training on program completion.

IV. HOW COORDINATION/CONSOLIDATION AFFECTS THE OPERATION OF THE FOOD STAMP E&T PROGRAM

Consolidation Linkages

At the state level, the DHS administration of the E&T and JOBS programs are consolidated in the Employment Services Unit within the Program Policy Division of Client Self-Support Services. However, the two programs are distinct, so services to JOBS and E&T clients are not integrated at the local level.

In Galveston, E&T services are provided by a local TEC office under contract from the state DHS office. JOBS services in Galveston are provided by local DHS case managers through referral to local community agencies for education and JTPA-funded services, and through a DHS contract with a community-based organization for preemployment services for the most job-ready clients.²

² The state DHS planned a demonstration of consolidated JOBS and E&T services in one county during FY 91. If successful, this may ultimately lead to integration of the two programs across the state.

Financial Coordination Linkages

Texas DHS has a financial contract with TEC and TAPIC to provide employment and training services to Food Stamp E&T participants. TAPIC serves three counties, while TEC serves 53. These contracts are intended to build on the existing expertise of the contractor in providing directed job search and job search training, as well as to take advantage of TEC's ability to provide computer matches between employer job listings and participants' job skills.

Nonfinancial Coordination Linkages

At the state level, a nonfinancial agreement exists between DHS and the Department of Commerce (which administers JTPA) for the provision of job services through the JTPA service delivery system in all 56 counties. Additionally, a nonfinancial interagency agreement has been developed with the Texas Rehabilitation Commission for referral of appropriate clients to the vocational rehabilitation system.

At the local level, TEC has informal agreements with local education agencies for the referral of E&T participants to their services.

**FOOD STAMP EMPLOYMENT AND TRAINING PROGRAM DESCRIPTIVE PROFILE
NORFOLK CITY, VIRGINIA**

Case Study Site: Norfolk City, Virginia.

Name of Program: Food Stamp Employment and Training.

The Food Stamp Employment and Training program¹ in Virginia is a state supervised, locally administered program for individuals receiving Food Stamp benefits who are not subject to any other work program requirements. The Job Opportunities and Basic Skills/Employment Services Program (JOBS/ESP) is a separate work program operated by Virginia for individuals receiving AFDC, with or without Food Stamp benefits. In Norfolk City, General Relief (GR) assistance is available only to unemployable individuals, hence, GR recipients are not required to participate in employment and training services. The three localities in Virginia that do provide GR assistance to employable adults require those GR recipients also receiving Food Stamps (FS) benefits to participate in the Food Stamp E&T program.

State Agency Responsible for the E&T Program

Virginia Department of Social Services, Division of Service Programs,
Employment Services Unit.

Local Agency Responsible for the E&T Program

City of Norfolk, Division of Social Services.

¹ The Food Stamp Employment and Training program in Virginia will be referred to as "E&T" throughout this descriptive profile.

State and Local Roles and Responsibilities

The Commonwealth of Virginia, Department of Social Services, determines statewide work registration/exemption policies, allocates Food Stamp E&T funds to local welfare departments, and requires local FSAs to operate front-end independent job search components for all participants.

State E&T specialists located in regional offices provide technical assistance to local welfare agencies and monitor local program operations.

Local welfare agencies may operate E&T programs in-house or, with state approval, use outside contractors. In addition to the independent job search component required by the state, local welfare agencies are responsible for the design and delivery of a variety of additional service components, including group job search, work experience, education, and vocational training services.

Although Norfolk Division of Social Services offers the full range of available service components, the program primarily emphasizes independent job search, which accounted for 94% of its service placements from July 1990 through April 1991.

Location of Program Responsibility Within Local FSA

Work registration and referral of voluntary and mandatory work registrants to the E&T program are performed by cash assistance intake/eligibility workers in each of the local welfare offices in the City of Norfolk.

Determination of work registration status is conducted by the Food Stamp eligibility workers. Provision of orientation/assessment and case management of E&T services are performed by staff assigned to a separate Food Stamp Employment and Training program unit, which is located in the Self-Sufficiency Services Division in a central service site.

Dependent care for E&T participants is administered by the Daycare Program unit, also located in the Self-Sufficiency Services Division, which oversees the direct reimbursement of day care providers for expenses incurred up to \$160 per dependent per month.

Types of Service Providers Used

The service provider in the City of Norfolk is the Food Stamp E&T Program unit, which administers the independent job search component. Another service component operated "in-house" is work experience (although very few participants are assigned to this component), facilitated by the JOBS/Community Work Experience Program (CWEP) counselor located in the JOBS/ESP unit of the Self-Sufficiency Services Division.

In addition, small numbers of E&T enrollees participate in education and training services under nonfinancial or low-cost individual referral linkages to a variety of service providers. Providers include the local community college, the public school system, and the JTPA service delivery area.

State and Federal Funding

The statewide budget for Virginia's Food Stamp E&T program in FY 1991 totaled \$4.1 million. Of the total budget, federal formula funds accounted for \$1.3 million and 50% state/50% federal funds for program costs totaled an additional \$1.2 million. Transportation and dependent care costs were budgeted at \$1.6 million (also shared 50% state/50% federal). Overall, 66% of the budget was federally funded from Department of Agriculture Food Stamp E&T funds, and 34% from state and local contributions.

The City of Norfolk received a total budget of just over \$250,000 from the state to operate the E&T program. The City contributed an additional \$29,000 to cover city related administrative costs not covered by the state. In Norfolk, federal formula funds and 50% state matched additional program funds are used exclusively for in-house program operations. Tuition payment to outside providers for additional services are made from the supportive services budget.

According to the state plan, the cost of serving an individual participant under the state E&T program is estimated at \$78 per service placement (excluding reimbursement for dependent care and/or transportation costs).

I. FOOD STAMP EMPLOYMENT AND TRAINING PROGRAM PARTICIPATION REQUIREMENTS

Mandatory Participants and Exemption Categories

Federal policies exempt FS recipients from E&T participation if they are exempt according to federal exemption criteria, e.g., participating in other public assistance work programs, or, exempt according to state categorical or individual exemption criteria.

Virginia's exemption categories resulted in approximately 37% of all mandatory work registrants being exempted from participation in the E&T program. First, the state implemented categorical exemptions for localities with over ten percent unemployment and/or less than 500 work registrants. The state FY 91 plan projected that 9% of the work registrants in the state (in 4 localities) would be categorically exempt from E&T participation due to high unemployment rates and 27% (in 75 localities) due to less than 500 registrants in the locality.

Second, in addition to the federal exemption criteria, the state specifies the following individual exemptions for those in localities that are not categorically exempt: (1) individuals residing an unreasonable distance from potential employers; (2) medical problems that will last longer than 60 days that make participation impractical; (3) individuals for whom day care and transportation is not available in the area; and (4) pregnancy during the second and third trimesters. The state's FY 91 plan projected that only 1% of work registrants would be individually exempt for the reasons stated above.

In the city of Norfolk, the eligibility worker is responsible for determining individual exemptions according to the federal exemption criteria. During the assessment process the E&T case workers determine which work registrants are individually exempt according to the four categories identified above. These individuals are placed into an inactive status. Inactive statuses are reevaluated annually or sooner, if the E&T or eligibility worker learns of a change in circumstance.

Participant Volume and Extent of Participation by Volunteers

Based on the local FY 91 plan and on actual numbers for October 1990 to April 1991, the E&T program in Norfolk is expected to serve about 2000 mandatory nonexempt work registrants during FY 1991, out of a total Food Stamp caseload of 6000. Between October 1990 and April 1991, only 14 volunteers were referred to the E&T program. A small number of volunteers was projected in the local FY 91 plan.

Description of Sanctioning Procedures

The E&T case worker initiates sanctioning procedures by sending a request for sanctioning to the eligibility unit for individuals who fail to meet participation requirements such as keeping assessment appointments or submitting documentation of required job search activities. The eligibility worker is responsible for actually sending the Notice of Adverse Action (NOAA) to the client. Although a substantial number of requests for sanctioning are issued, most NOAAs are "cured" before sanctions are actually imposed. (During October to April, 1668 NOAA requests were sent but only 349 or 21% resulted in sanctions being imposed.) This sanctioning rate comprises approximately 25% of the mandatory nonexempt pool required to participate in the E&T program.

II. CLIENT TARGETING POLICIES AND CLIENT FLOW SEQUENCE

Client Targeting Policies

There are no client targeting policies within the mandatory registrant pool in this locality. In addition, all mandatory and voluntary work registrants are treated equally. However, mandatory registrants may be temporarily placed into inactive status by E&T case workers, if their particular circumstances appear to be serious barriers to successful participation in E&T activities. Examples of those who may be placed on inactive status include substance abusers, non-English speakers, and those who do not have any work experience. Clients are placed on inactive status when participation in an independent job search is unrealistic since the likelihood of securing employment is essentially nonexistent. Inactive status clients remain on the E&T caseload; when their circumstance change, they are required by their E&T case worker to participate.

Client Flow and Service Sequencing

In the Norfolk E&T program, as in all programs in the state, all mandatory registrants and volunteers are required to conduct an up-front independent job search lasting 4 weeks. Exhibit 15-1 details the client flow through the E&T program. Once Food Stamp recipients are determined to be mandatory or voluntary work registrants by the eligibility worker, they are referred to the E&T Unit for orientation/assessment. Currently, the Norfolk program emphasizes group assessments involving up to 60 participants. Except in a few cases, all clients are required to conduct an initial independent job search. (Waivers of this requirement may be obtained from state staff for those who are already enrolled in an educational or training activity.) For those who do not obtain full-time employment through the initial independent job search, a reassessment session is conducted and clients are placed into other program components, depending on interest and availability.

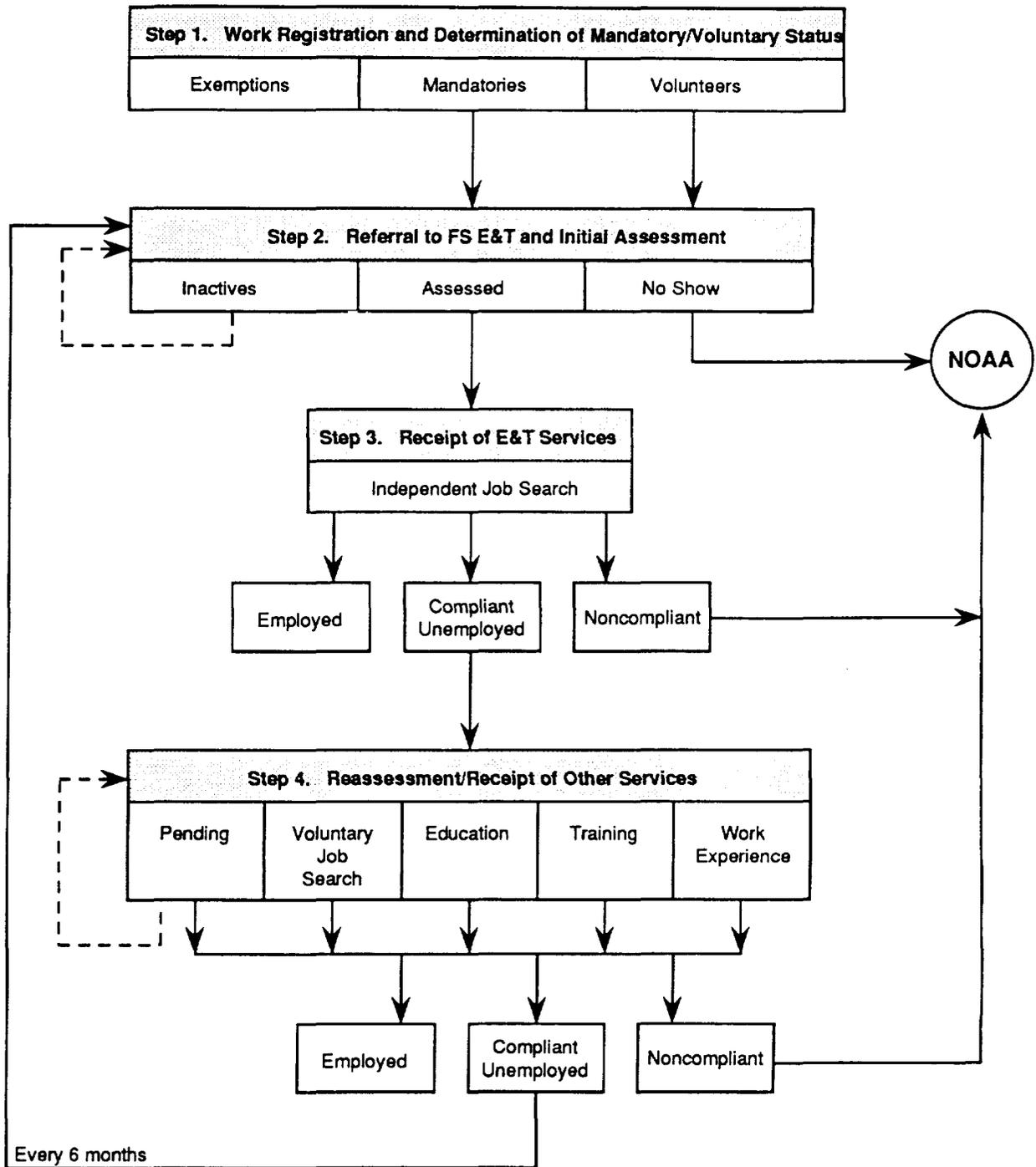


EXHIBIT 15-1 CLIENT FLOW: NORFOLK CITY, VIRGINIA

Additional service options in Norfolk include: a repeat of independent job search (on a voluntary basis), participation in a 13-week community work experience component, participation in a two-day Human Potential Seminar operated at a local community college for AFDC and Food Stamps clients, and individual referral to community education and training options.

Clients who do not enter one of these activities are placed in "pending" status until a desired component becomes available or until their next required independent job search. An independent job search is required every 6 months unless a client is participating in another program component.

The service design in Norfolk includes few opportunities for individualized service planning or counseling regarding employment or training options. Although brief assessment forms may be completed at initial orientation/planning meetings, they are not generally used to match the client to services. Client preference and client initiative determine whether individuals will participate in any program component beyond the initial job search. The E&T case workers have limited input into this process, and few enrollees actually participate in any services beyond the required independent job search. Constraints on participation in additional components include limited program funding for outside service providers and limited enrollee initiative in pursuing these services.

Clients terminate from the E&T program when they become exempt or are no longer Food Stamp recipients.

III. E&T SERVICE COMPONENTS

Services Required for Some or All Work Registrants

Independent job search is a mandatory service component that must be performed every 6 months. In the City of Norfolk, independent job search is an in-house component managed by the E&T case worker which requires 18 employer contacts within a four week period. Clients are required to record

information regarding their contacts and return this information to their E&T case worker. Between July 1990 and April 1991, about 94% of Norfolk's E&T work registrants who entered a program component entered independent job search, for a total of 1,534 participants in this component.

Once the initial up-front independent job search is completed, a group or individual reassessment is conducted by the E&T case workers. At reassessment, clients may receive services in other program components (subject to sanctions unless the client is a voluntary exempt client).

During participation in job search and other program components, clients are eligible for supportive services; up to \$160/month for dependent care and \$25/month for other expenses such as transportation, work tools, or tuition.

Additional Services That Can Be Requested by Mandatory Registrants or Volunteers

Mandatory nonexempt work registrants who complete independent job search as required and are still unemployed may volunteer for another independent job search or for education or training services. Additionally, clients who are exempt from work registration may volunteer for program services and are allowed to participate in all E&T program components offered by Norfolk City.

Very few E&T participants receive other services because participation is voluntary and the high E&T caseload prevents case workers from working closely with participants to develop individual employability plans. Between July 1990 and April 1991, 2 individuals (less than 1%) participated in job club, 20 (1%) entered a work experience component, about 3% entered educational programs available in the local community after referral from the E&T program, and about 2% participated in community training opportunities such as JTPA (some of these activities were supported from the supportive services budget line).

The intensity of these other service components depends on the component and the requirements of the service provider. Examples of outside service providers are the JTPA program, the Educational Opportunity Center--a local program federally funded by the U.S. Department of Education, the public school system, and the community college system. In most cases the service referrals are nonfinancial; in other cases the local E&T program is able to pay tuition in monthly installments of up to \$25 per client per month.

IV. HOW COORDINATION/CONSOLIDATION AFFECTS THE OPERATION OF THE FOOD STAMP E&T PROGRAM

Consolidation Linkages

Although the state administration and oversight of the E&T Program and the JOBS program are consolidated, the operation of these programs is kept almost completely separate. Case workers in the E&T unit manage only E&T clients. However, one effort at consolidated program design and operation has resulted in an activity in which both E&T and JOBS clients participate. Local E&T and JOBS staff joined with a community college to design and operate a 2-day seminar on human potential skills that focuses on motivation, goal setting, and increasing self-esteem. The regular community college tuition for a 1 credit course is paid for each client referred to this program.

Coordination Linkages

In Norfolk City 52 people were placed into education and 26 into training components through individual referrals to existing community resources. Most coordination arrangements are nonfinancial referrals although a few financial coordination arrangements exist for GED and the Human Potential Seminar provided by the local community college. Providers include public schools, community college, JTPA, and the Education Opportunity Center.

Nevertheless, coordination efforts among different agencies in the local area occur mainly at the administrative levels, i.e., administrators from different agencies serve together on boards and committees that promote local activities. The different agencies are aware of the needs of E&T clients and the E&T program is aware of the services available in the community. However, without a greater investment in individualized service planning and financial arrangements between E&T and these other services, few clients are able to take advantage of community resources as a result of participating in the Food Stamp E&T program.