

DPSS/WDACS CalFresh Expansion Pilot Program (CEPP)

Provider Handbook

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**The County of Los Angeles Workforce Development, Aging and Community Services**

The County of Los Angeles Workforce Development, Aging and Community Services (WDACS) serves as an intermediary for the DPSS/WDACS CFET Expansion Pilot Program . As Los Angeles County's lead agency for workforce development, [WDACS](https://wdacs.lacounty.gov/) administers one of the largest public workforce systems in the nation. WDACS also makes comprehensive business, employment and training services available through its system of America’s Jobs Centers of California (AJCCs).

**The Department of Public Social Services**

The County of Los Angeles Department of Public Social Services (DPSS) is the state-approved local oversight entity for the DPSS/WDACS CFET Expansion Program. [DPSS](https://dpss.lacounty.gov/) is the second largest County department in Los Angeles County and the largest social service agency in the United States. DPSS serves over 10 million residents in a county larger in population than 42 states, encompassing 88 cities.

**REDF**

The Roberts Enterprise Development Fund (REDF) is providing technical assistance to operationalize core program elements and comply with federal requirements. [REDF](http://www.redf.org/) has significant expertise in implementing CFET programs across California and is subcontracting to Seattle Jobs Initiative (SJI) and AC Strategic Solutions, nationally recognized SNAP E&T experts. In line with REDF’s mission to increase the capacity of social enterprises, REDF is contributing financial resources to support program implementation.

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**Purpose of Handbook**

The purpose of the *CEPP Handbook* is to help CEPP providers understand their role, options, and responsibilities in delivering CEPP services in accordance with local, state and federal requirements. This Handbook incorporates general CalFresh and CFET policies, as well as standards developed specifically for CEPP by WDACS and DPSS. All required policies and standards in the Handbook are contractual obligations for CEPP providers, as stated in the WDACS-Provider CEPP Subaward. The policies described in the Handbook are not intended to supersede the policies of any funders, agencies, and match programs that have more restrictive fiscal and programmatic requirements.

As the CEPP model is tested and modified, the Handbook will reflect program changes in sequential addenda and versions. Please make sure you have the latest version, available at <https://redfworkshop.org/la-county-cfet/>.

**Further Information and Technical Assistance**

WDACS supports providers in understanding CEPP administrative requirements, assessing financial feasibility, deciding whether to implement CEPP, completing a proposal, preparing for implementation, optimizing CEPP operations, and preparing for program and fiscal reviews. For more information, please contact Isidro Villanueva, Director of Economic and Business Development Division, WDACS at ivillanueva@wdacs.lacounty.gov.

Table of Contents

[Introduction 4](#_Toc94794958)

[Part I. Program Model 7](#_Toc94794959)

[1. Program Basics 7](#_Toc94794960)

[A. CEPP Program Services 7](#_Toc94794961)

[B. Case Management 8](#_Toc94794962)

[C. Supportive Services 8](#_Toc94794963)

[2. New Participant Enrollment 9](#_Toc94794964)

[A. Participant Flow for Reverse Referrals and Enrollment 15](#_Toc94794965)

[3. Confidentiality and Data Security Requirements 19](#_Toc94794966)

[4. Provider Determinations 19](#_Toc94794967)

[5. Program Reporting 20](#_Toc94794968)

[Quarters of Federal Fiscal Year 20](file:///P:/kcornelious/CEPP/CEPP%20Provider%20Handbook%20Version%207_2.1.22.docx#_Toc94794969)

[A. Quarterly Progress Report 20](#_Toc94794970)

[B. Quarterly Outcome Report 20](#_Toc94794971)

[6. Continuous Quality Improvement and Staff Engagement 21](#_Toc94794972)

[7. Communications and Materials 22](#_Toc94794973)

[8. CEPP Participant Record 23](#_Toc94794974)

[9. Civil Rights and Non-Discrimination Training 23](#_Toc94794975)

[10. Participant Complaints, Injuries and Property Damage 24](#_Toc94794976)

[Part II. Funding and Financial Management 26](#_Toc94794977)

[1. CEPP Financing Mechanism 26](#_Toc94794978)

[Reasonable and Necessary Costs 26](file:///P:/kcornelious/CEPP/CEPP%20Provider%20Handbook%20Version%207_2.1.22.docx#_Toc94794979)

[2. CEPP-Allowable Costs 29](#_Toc94794980)

[3. Spending Federal Funds 30](#_Toc94794981)

[4. Supplantation Prohibitions and Precautions 30](#_Toc94794982)

[5. Budget 31](#_Toc94794983)

[Federal Fiscal Year 31](file:///P:/kcornelious/CEPP/CEPP%20Provider%20Handbook%20Version%207_2.1.22.docx#_Toc94794984)

[6. Invoices 32](#_Toc94794985)

[A. When Costs Can Be Billed 32](#_Toc94794986)

[B. Position Changes Mid-Year 33](#_Toc94794987)

[C. Invoice Submission 33](#_Toc94794988)

[D. Invoice Adjustments 34](#_Toc94794989)

[7. Cost Allocations and Indirect Guidance for Budgets and Invoices 34](#_Toc94794990)

[8. Time Records for Staff and Volunteers 35](#_Toc94794991)

[9. Program and Fiscal Monitoring, Audit, and Liability 37](#_Toc94794992)

[A. Program and Fiscal Monitoring 37](#_Toc94794993)

[B. Independent Audit 37](#_Toc94794994)

[C. Liability 37](#_Toc94794995)

[10. Fiscal Documentation Guidelines 38](#_Toc94794996)

[APPENDIX A: Service Components 40](#_Toc94794997)

[APPENDIX B: Supportive Services 45](#_Toc94794998)

[APPENDIX C: CalFresh Confirm Overview 52](#_Toc94794999)

[APPENDIX D: Quarterly Outcome Report Instructions 55](#_Toc94795000)

[APPENDIX E: Key CEPP Dates 62](#_Toc94795001)

[APPENDIX F: Glossary 63](#_Toc94795002)

[Endnotes 66](#_Toc94795003)

# Introduction

CalFresh Employment and Training (CFET) is a flexible, sustainable federal reimbursement program that can help increase the employability of recipients of CalFresh (food stamps). It can fund a wide array of training and workforce services, such as career counseling, work-based learning, job readiness training, job placement, and job retention; services related to self-sufficiency such as financial literacy training or a healthy lifestyle class; and a variety of participant supportive services, such as transportation, dependent care, uniforms, fees, textbooks, and emergency housing. The range of services and reimbursement opportunities CFET offers makes it a critical tool in expanding employment and training services to low-income Californians.

CFET is funded through the United States Department of Agriculture Food and Nutrition Service (USDA FNS) and is known nationally as the Supplemental Nutrition Assistance Program (SNAP) Employment and Training (E&T) program. The program provides up to 50% reimbursement on qualified agency funds that are spent on new and/or existing employment and training services to eligible participants. Qualified agency funds must typically be non-federal and not already used to match other federal funds.

Over the past fifteen years, a national model for meeting funding requirements—the third-party partner model—has created a significant opportunity to expand CFET services and increase the employability of CalFresh recipients. Under this model, educational and community-based providers can leverage their own qualified agency funds to secure federal funds and provide services when contracted with the local SNAP agency or its intermediary.

The Los Angeles Department of Public Social Services (DPSS) operates the County’s CalFresh Employment and Training (CFET) program. In 2021, DPSS in collaboration with the County of Los Angeles Workforce Development, Aging and Community Services Department (WDACS) launched the WDACS CFET Expansion Pilot Program (CEPP). The pilot is the first third party partner model in LA County and approved agencies contracted with WDACS will deliver employment and training services to eligible CalFresh recipients enrolled in CFET via DPSS. Under CEPP, WDACS serves as an intermediary to support DPSS (the CalFresh oversight agency) in partnering with selected third-party providers.

Under CEPP, third-party providers receive 45 cents in federal reimbursement for every dollar of qualified agency funds. CEPP makes it easy for providers to access CFET dollars by: (1) providing much of the infrastructure needed to administer the program at a county level, including functions such as provider selection, training, billing, contracting and monitoring; and (2) creating economies of scale and standards of compliance that reduce the burden on providers and government oversight entities.

The CEPP program targets low-income CalFresh recipients with barriers to living wage jobs. Typically, CalFresh recipients are citizens or legal residents with gross incomes at or below 200 percent of the federal poverty level, unless otherwise qualified. CEPP providers can increase the number of CalFresh recipients amongst their new and existing participants through outreach efforts, CalFresh application assistance, and a program designed to encourage CalFresh enrollment. **To qualify for CFET, CalFresh recipients cannot receive CalWORKs or be recipients of the California Food Assistance Program (CFAP), a state-funded program parallel to CalFresh.**

Providers may leverage the CEPP reimbursement by billing for existing services (using qualified agency funds), provided that a portion of the federal reimbursement is used to fund new services, increased quantities of services, increased supportive services, or increased numbers of participants.

Ultimately, CEPP helps move participants out of poverty by:

* **Improving skills**: CEPP is a critical funding stream that can be braided with other funding to support employer-valued education and skills training, work experience, job readiness and placement, and retention services to unemployed, part-time, and low-wage workers in Los Angeles County.
* **Creating jobs**: CEPP can help fund transitional employment opportunities that increase readiness for permanent jobs. Federal rules allow CEPP to reimburse providers for the cost of subsidized wages for CEPP participants. Employment social enterprises such as the first pilot providers are excellent examples of the potential for increased transitional employment opportunities through CEPP.
* **Increasing participation in CalFresh:** Many Californians experience food insecurity. CalFresh helps to ameliorate the harmful impacts of poverty, food insecurity, and poor nutrition on health and well‐being, yet California has one of the lowest enrollment rates in the country for eligible persons. CEPP increases food security by aligning employment and training provision with CalFresh enrollment.

# **Part I. Program Model**

## Program Basics

Individuals can receive CEPP services by meeting the following criteria:

**CEPP/CFET eligibility:**

* **Eligible individuals are 16 years and older**
* **Reside in Los Angeles County,**
* **Wish to work, are physically fit to work**
* **Receive CalFresh and not CalWorks**.

As long as a participant remains on CalFresh and remains CFET eligible there is not a time limit to participation and program enrollment.

### **CEPP Program Services**

CEPP services are called “components” and listed below. They are described in detail in Appendix B.

* Supervised Job Search
* Workfare
* Work Experience
* Education
* Self-Employment Training
* Job Retention.

**CEPP providers must offer at least one component not including job retention which is reserved for participants who have completed a component prior to transitioning to employment.**

**All E&T participants must receive case management services as part of the E&T program and each component must also be accompanied and supported by case management**.

CEPP services can be tailored to meet the needs of each community. Services must be allowable under CEPP and be described within an approved CEPP Proposal, which must be updated annually. WDACS encourages providers to offer service components that align with CEPP and organizational priorities, organizational resources, the needs of local participants, and best practices in workforce development and education include:

A variety of training and workforce services may fit within these broad categories, such as adult-basic education, GED, ESL programs, vocational training, career navigators, mentor-protégé programs, sector initiative activities, job readiness and soft skills training, job placement, employer liaisons, transitional employment, On-the-Job Training, apprenticeship and pre-apprenticeship, job shadowing, peer counseling, and academic tutoring.[[1]](#endnote-2)

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### **Case Management**

**Providers must offer individualized, ongoing case management services that help participants overcome challenges to CEPP program completion and employment success**. **Case management services are included as a part of each component offered by providers**.

Case management may include activities to remove employment barriers as well as to provide comprehensive intake assessments, individualized service plans, progress monitoring, and coordination with other service providers to connect individuals to programs and activities that best meet their CEPP participation and employment needs. CEPP providers may also adopt different modes for the delivery of these services (e.g., virtual, over the telephone, in-person, or hybrid approaches) and may employ different staffing arrangements for case managers. Case management services should only be provided when there is a clear connection between the services and supporting the participant to succeed in CEPP or become more employable and should never create an obstacle or burden for the participant.

CEPP providers have flexibility in the types of services offered through case management but can only use E&T funds for allowable components, activities, and participant reimbursements. For instance, a case manager may conduct an employability assessment and determine an individual likely struggles with substance use disorder. The case manager can identify helpful resources in the community and refer the individual to substance use disorder services as part of E&T case management, but, E&T funds cannot be used to pay for substance use disorder treatment services, as substance use disorder treatment services are not an allowable activity in the E&T program.

An effective method for documenting the delivery of case management services and related participant progress is through the use of regular case notes at a suggested frequency of at least once a month. Participation in required case management should not create an impediment to participation in CEPP or continued program eligibility

### **Supportive Services**

Supportive services address specific barriers to employment and assist with successful program participation, job attainment and retention. All CEPP participants must be made aware of and offered supportive services beginning with an initial screening and assessment as a part of ongoing case management. Supportive services need to be reasonable, necessary, and directly tied to employment and training services. CEPP providers describe their supportive services within their annual CFET plan proposal based on their capacity to offer supportive services.

Supportive services, also referred to as participant reimbursements, can include—but are not limited to—dependent care, transportation, and ancillary items such as books and supplies, tools, clothing and uniforms, and personal safety items. Other examples are emergency housing, background and TB testing for potential jobs, union dues, personal hygiene purchases, training materials, and testing fees. Participants can either pay their own supportive service expenses and be reimbursed, or the provider may pay a vendor up front or in arrears.

**The provider must document the case file that the participant’s supportive services needs are addressed**. Acase note is suggested to document and describe the provision of a supportive service which is particularly helpful when there is a need to clarify why a specific supportive service is necessary, reasonable, and directly tied to employment.

S**ee Appendix A for a detailed description of Supportive Services.**

## New Participant Enrollment

As noted, **CEPP eligibility includes the following**:

* **Eligible individuals are 16 years and older**
* **Reside in Los Angeles County,**
* **Wish to work, are physically fit to work**
* **Receive CalFresh and not CalWorks**.

The CEPP program is being rolled out by WDACS and DPSS in two phases. Phase 1 includes reverse referrals only, in which eligible CalFresh recipients are first identified and referred by the CEPP provider. Phase 2 will include both direct referrals from DPSS and reverse referrals. When Phase 2 begins, the process for making direct referrals and any changes to the process for reverse referrals will be updated in the Handbook.

**Phase 1. Reverse Referral:**

With reverse referrals the enrollment process begins when a participant requests E&T services with the CEPP provider. CEPP providers screen participants for CEPP eligibility with participants typically falling into one of the following statuses:

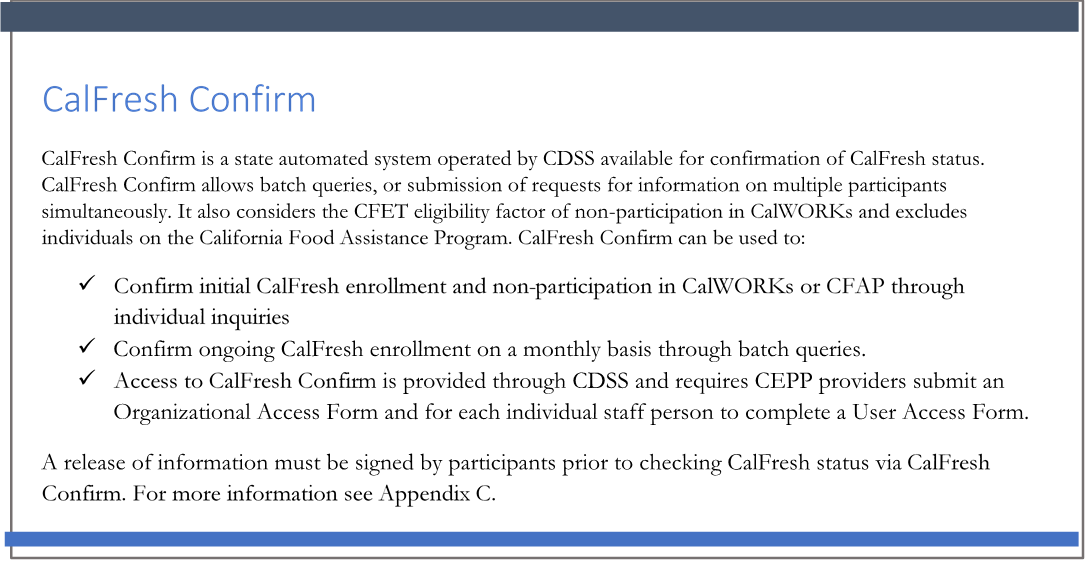
* On CalFresh and meet CEPP eligibility criteria listed above;
* Not on CalFresh but likely eligible for CalFresh and CEPP but need to apply and be approved; or
* Do not meet CEPP criteria – may be on CalWorks or not eligible for CalFresh for other reasons.

For participants that appear to be on CalFresh and meet CEPP eligibility, providers can proceed as follows:

1. CEPP provider determines whether their employment program and services are a good “fit” through its program orientation, screening, intake, and assessment processes. Participants also decide if the program is a good match and agree to participate.
2. CEPP enrollment starts with checking on CalFresh status and CFET eligibility using one of the following approaches:

* Asking participant if receiving CalFresh, not CalWorks
* Checking CalFresh Confirm to verify eligibility
* Asking participant to check CalFresh status via Your Benefits Now

1. CEPP provider enters eligible participant (CalFresh/not CalWorks) on CFET Referral and Enrollment Roster and submits the roster to WDACS & DPSS for CEPP/CFET eligibility confirmation and enrollment
2. Provider informs participant of CEPP enrollment following DPSS confirmation



**Is the participant on CalFresh already?** A question on CalFresh status can be asked during orientation or intake. If the participant is unsure of their status or states that they are enrolled in CalFresh, their status should be formally confirmed and documented via CalFresh Confirm as soon as possible (see CalFresh Confirm sidebar below) or via Your Benefits Now (YBN). Non-CalWORKs status may also be confirmed in similar manner at this time.

If the participant is not on CalFresh:

**Is the participant willing to apply for CalFresh?** Participants may be encouraged to enroll following an explanation of CalFresh benefits and offered assistance if the CEPP provider is able to do so.

**Is the participant likely to be eligible?** Questions on household income level can help identify applicants who are likely eligible for CalFresh. A more comprehensive screening for CalFresh eligibility, along with information on the steps needed to apply, may further increase enrollment.

**Is the participant interested in receiving support for the application process?** Application assistance has proven to significantly increase the likelihood of a successful CalFresh enrollment. Another key factor in increased enrollment is stationing computers onsite that link to YBN, the county portal for CalFresh enrollment. CalFresh application assistance may not be billed to CFET.

If the participant is not on CalFresh, the provider may elect to assist the participant apply for CalFresh. This assistance, while important, is not a reimbursable CEPP service.

Once a participant is approved for CalFresh and appears to meet CEPP criteria via CalFresh Confirm or YBN, the CEPP provider can enter the participant on the roster and follow the Reverse Referral steps describes above.

Service providers have the option to begin serving participants that are in the process of applying for CalFresh. Once the participant is approved for CalFresh and is determined CEPP/CFET eligible, the participant is entered onto the CFET Referral and Enrollment Roster. Service providers are encouraged to use CalFresh Confirm or Your Benefits Now to verify CFET eligibility. The CEPP program start date can be the date the participant was approved for CalFresh,

It is highly recommended that CEPP staff become familiar with CalFresh eligibility rules and processes. Please refer to the CEPP CalFresh Manual for further information on eligibility.

**Phase 2. Direct Referral**

Direct referrals occur when DPSS refers an eligible CalFresh recipient to a specific service provider for services. In this case, DPSS will screen the CalFresh recipient typically as a part of the CalFresh application process to determine CFET appropriateness and “fit” with the service provider program. With direct referrals, service providers do not need to confirm initial CEPP/CFET eligibility as this task is completed by DPSS.

***Orientation, Intake and Assessment***

**Providers must conduct orientation intake, and assessment for each applicant as a part of the CEPP enrollment but have flexibility on how this will be offered**. These activities can be scheduled independently or combined seamlessly and conducted in group settings or one-on-one. CEPP providers are encouraged to integrate CEPP elements into existing orientation, intake and assessment processes as practicable.

**Orientation/Intake**:

Orientation is an opportunity to inform participants about CEPP, explain program requirements, and provide brochures or other program materials. The orientation should describe the provider organization, program and services provided, and basics of CEPP such as eligibility and supportive services offered. Orientation may be provided either individually or in a group setting, virtually and incorporated within the CEPP providers program orientation for all program participants including non-CEPP participants. Participants should have the opportunity for face-to-face interaction with program staff and providers should have participants document completion of orientation via a participant signature. Intake is a time for collection and review of required applicant information. At a minimum, the intake process must include a set of standardized intake questions, a Consent for Release of Confidential Information, and an applicant signature confirming their completion of orientation, provision of accurate information during intake, and willingness to participate in CEPP if approved. If a signature cannot be obtained, another method of documentation may substitute. If desired, CEPP staff can provide applicants with forms for completion prior to an intake appointment.

**Assessment**

**CEPP participants are required to be assessed prior to placement in a specific E&T component**. Assessment should include an in-depth evaluation of employability coupled with employment goals and skills assessments. This can be done by an E&T counselor, case manager, or an E&T service provider. The results of the assessment should be matched with criteria for participation for individual components and specific activities offered by the provider

Assessment may take the form of an interview with notes, an assessment checklist, an educational plan, or another approach. The assessment can be comprehensive or basic, with more comprehensive assessments that follow enrollment if desired. The assessment should consider the applicant’s fit for services in the approved CEPP Proposal. The following are sample topics:

* Education, including literacy level;
* Communication skills, including English-language proficiency;
* Employment history
* Employment skills, abilities, and interest; and
* Barriers to employment and steps necessary to overcome these barriers.

Provider staff should develop a common understanding about the assessment process and what constitutes a good fit for CEPP. Documentation should be maintained for all applicants for a minimum of three federal fiscal years plus the current federal fiscal year (or longer if requested by county agencies) and made available for review by oversight agencies as requested. This includes those not ultimately enrolled in CEPP.

**Employment Plan**

**Providers are expected to complete an Employment Plan with CEPP participants, and the plan can take a variety of formats.** Providers do not need to create a different employment plan for CEPP participants as long as their current format covers the topics listed below. WDACS and DPSS can provide guidance on employment plans and formats as needed. Plans should include the following:

* Employment objective (should be consistent with assessment).
* Activities to be undertaken (i.e. E&T components, case management) to achieve objective.
* Tentative dates, times, and locations for each activity.
* Anticipated hours of activity
* Supportive Services provided by agency (e.g. child care, transportation).
* Statement of participant’s responsibilities and consequence of failing to comply
* Signature of participant and CEPP provider

Plans can be updated as needed to reflect new components and activities.

***Provider Decision on CEPP Enrollment***

Following orientation, intake, and assessment, the provider decides whether to enroll the participant into CEPP. In making the CEPP enrollment decision, the provider must consider whether an individual is a good fit for the program and is being matched to a program in which they are likely to be successful.

If the person is not a good fit, the provider should assist the individual in finding a more appropriate program. WDACS can provide a list of referral resources if desired. For all program activities, including participant enrollment, providers are prohibited from discriminating against an individual for reasons of age, race, color, sex, disability, religious creed, national origin, or political beliefs.

For participants confirmed to already be on CalFresh and not-CalWORKs, formal CEPP enrollment can take place as soon as the decision is made.

**CEPP providers need to confirm CEPP eligibility on a monthly basis following enrollment.**

**Service providers are expected to confirm ongoing CFET/CEPP eligibility on a monthly basis** using either CalFresh Confirm or Your Benefits Now. It is recommended that providers maintain documentation of continued eligibility via screen shot, printed copies or other suitable other format. Since an ongoing participant’s CalFresh and CalWORKs status may change and make them ineligible for CEPP, CEPP staff must review their status on a monthly basis prior to claiming costs for that participant or entering their information into a report. When participants lose CalFresh eligibility, CEPP services cannot be billed or included in reports. However, participants should not be officially terminated, and their effective date should remain in place until the 90-day look back period has passed, as described in Appendix F, Quarterly Outcome Report. Providers may wish to continue to provide services to the participant outside of CEPP.

**CFET Referral and Enrollment Roster**

* Providers send monthly CFET Referral and Enrollment Rosters to DPSS (via County) to communicate information on active CEPP participants such as participant name and other identifying information, program start date, components, program status, reasons for stopping, and other key data for required reports. New names on the roster trigger DPSS to enroll CEPP participants in CFET. Unless DPSS finds the applicant ineligible for CFET, DPSS will use the effective date supplied by the provider on the roster as its date of CFET enrollment. Only participants who have completed the CEPP enrollment process, been found to be a good fit for CEPP, and have been confirmed to be on CalFresh and not CalWORKs should be entered on the roster. The program Start Date for participants should be the same date as the Orientation/Assessment. If the Orientation/Assessment are conducted on different dates, enter the **first** date attended.

Following roster review, DPSS will communicate back about any discrepancies in participant eligibility in CalFresh or CFET. CEPP providers can reach out to DPSS on behalf of individuals DPSS has determined ineligible in order to remedy any errors.

The roster is submitted monthly by the 10th calendar day to County secure portal folder, where it will be retrieved by DPSS. The monthly roster will exclude data for the current month.  For example, a roster due to DPSS by June 10th will include participants served between May 1st through May 31st. It will also include ongoing participants who have participated in CEPP or a component in May.

The roster will include multiple rows for each component a participant receives. A row can be removed the month after the component completion date has been shared in the roster, and the last row can be removed the month after the program completion date has been shared.

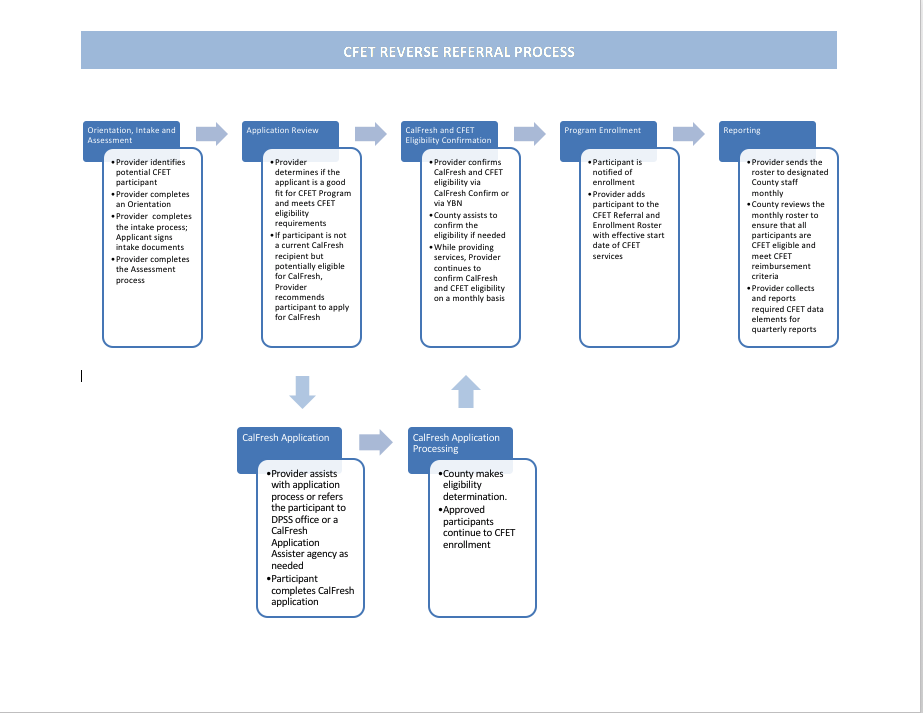
*Communication to Participant about Enrollment or Ineligibility in CEPP Program (by Provider)*

Each participant must be made aware of their enrollment in CEPP and effective date once the effective date has been determined. This can be in the form of a Participant Enrollment Letter, documented verbal confirmation or other means. A case note in the participant’s record should be included to reflect enrollment. An individual should also be made aware of any initial ineligibility or change in eligibility and be referred to a more suitable placement, if applicable. Sample forms for these communications are available at <https://redfworkshop.org/la-county-cfet/>.

### Participant Flow for Reverse Referrals and Enrollment

The participant flow chart below reflects the *CFET Reverse Referral Process* in Phase 1.

In Phase 1, the CFET Referral and Enrollment Roster will be used as a tool for reverse referral to communicate CEPP enrollment by the provider and initiate CFET enrollment by DPSS. As CEPP transitions to Phase 2, the roster and charts below will be updated to reflect the process for DPSS to directly refer eligible CFET participants to CEPP providers (direct referrals).



**Collaboration**

CEPP providers are encouraged to collaborate with available employment and training partners including American Job Centers of California (AJCC), community and technical colleges, adult education providers, and CFET partners and other available employment services. When beneficial to a participant, CEPP providers can co-enroll and mutually serve participants in coordination with local partners. Careful collaboration is needed to ensure that services are not being duplicated or offered in a way that becomes burdensome or confusing to the participant.

There is a great interest in strong coordination with local Workforce Boards, AJCCs and community and technical colleges to offer meaningful career pathways and access to living wage jobs.

In addition, CEPP providers are encouraged to pursue and establish beneficial relationships with local employers who may be able to offer quality employment and wage progression opportunities for participants who have acquired desired in demand technical skills.

**Able Bodied Adults Without Dependents (ABAWD)**

ABAWDs are individuals who receive CalFresh and are:

* Age 18-49
* Have no dependent children
* Able to work
* Do not have a physical or mental condition

ABAWDs have a work requirement and can receive CalFresh benefits for only three months in a 36-month period unless they work at least 80 hours per month, participate in qualifying work activities such as workfare or selected CEPP components, or live-in areas that have ABAWD waivers.

Los Angeles County currently has an ABAWD waiver but still needs to collect CFET data by ABAWD status. The CFET Referral and Enrollment Roster includes a column for indicating ABAWD status which is the responsibility of DPSS to complete and communicate to the CEPP provider.

**Student Eligibility**

In general, students between the ages 18-49 enrolled at least half time at an institution of higher education are *not* eligible for CalFresh although the following exemptions exist:

* Students with a disability
* Receiving CalWorks(TANF)
* Working 80+hours/ month
* Approved for work study
* Placed in education activity through SNAP E&T or another E&T program meant for low-income individuals

If a CEPP provider wants to serve a student that does not quality for exemptions and is therefore ineligible for CalFresh, the provider may complete a Pre-Enrollment Form with the student and ask the student to submit (upload) it as a part of their CalFresh application. The form is available at: <https://redfworkshop.org/la-county-cfet/>

## Confidentiality and Data Security Requirements

CEPP staff are responsible for maintaining the confidentiality and security of an individual’s personally identifiable information (PII). Examples of PII include social security number, birth date, participation in CEPP, and CalFresh status. Applicants must sign a form permitting release of confidential information to selected parties prior to enrollment in CEPP.

CEPP providers must protect against unauthorized or unlawful access, use, disclosure, accidental loss, destruction, or damage to any County Information including PII, and implement privacy practices and protocols including a response plan to address incidents/breaches and ongoing privacy assessments.

Funding for confidentiality and security costs can be included in the CEPP Proposal budget. Please see the Subaward for more information. Highlights include:

* Screening and conducting background investigations (including fingerprint checks through the state Department of Justice) on all staff and subcontractors with access to County Information (requirement is currently waived due to COVID-19)
* Providing annual training to all staff on a series of predefined topics such as information security procedures, risks and threats
* Encrypting all workstations, portable devices and removable media that store County Information in accordance with Federal Information Processing Standard (FIPS) 140-2, and password-protecting all devices
* Placing paper documents containing County Information in a locked drawer or locked cabinet when not in use; when printing, immediately removing documents with PII from the printer, and shredding paper (using cross-cutting shredder) to dispose of it
* Keeping data onsite unless for the purpose of transfer to an authorized location (and properly secured)

Provider staff should not send PII over email but should instead use protocols established by WDACS. Staff that wish to access the WDACS secure system must sign the WDACS Confidentiality Agreement Form, available on <https://redfworkshop.org/la-county-cfet/> and submit the form to the WDACS Data Management & Analytics Section contact person.

## Provider Determinations

If a provider determines that a participant is not a good fit for CEPP after participation has begun, it must issue what is known as a “provider determination,” which involves communicating with DPSS about the participant’s suitability for their CEPP program. Examples of lack of fit can be an inability to meet minimum participation requirements, lack of physical or mental fitness for work, or a change in assessment of skills and interests. A provider must notify DPSS within 10 days of making a provider determination and inform DPSS of the reason for the provider determination. The provider may offer DPSS a suggestion on the most appropriate next step for the individual. Further information on provider determinations is pending state guidance.

## Program Reporting

Reporting on CEPP participants, services, and outcomes is crucial to demonstrating both the efficacy of CEPP and the quality of program administration. Two quarterly reports are required by state and federal oversight entities. CEPP providers may use existing internal tracking tools or Customer Relationship Management (CRM) technology to collect data for program reporting. Reports must be collected based on quarters of the federal fiscal year. WDACS may also request data at different time intervals, as necessary.

#### Quarters of Federal Fiscal Year

*Quarter 1:* October 1 – December 31

*Quarter 2:* January 1 – March 31

*Quarter 3:* April 1 – June 30

*Quarter 4:* July 1 – September 30

The report due dates listed below refer to calendar days. If the due date falls on a holiday or weekend, the due date is moved to the previous business day.

### Quarterly Progress Report

The Quarterly Progress Report requires a short narrative regarding challenges, opportunities, and technical assistance needs. It also asks for numbers of projected participants annually and participants served year-to-date. The report must be submitted to WDACS by the 10th calendar day of the month following each quarter via email. A copy of the report form is available on <https://redfworkshop.org/la-county-cfet/>. Prior to submission, please name the Quarterly Progress Report (QPR) using the naming standard of provider name QPR\_ submission date.

### Quarterly Outcome Report

The Quarterly Outcome Report asks for data on demographics, eligibility categories, and program/component entry and completion for all participants of CEPP. Participants to include in the report are those who are currently participating in CEPP, those who have terminated the CEPP program within the current federal fiscal year, and those who have terminated the program in the prior federal fiscal year but are still in the look back period (as defined in Appendix F) in the current federal fiscal year. The data from this report will be matched at the state level with Employment Development Department (EDD) data on employment and median wages. Data must be submitted to County via secure portal by the 15th calendar day of the month following each quarter. For more information, please see Appendix F.

## Continuous Quality Improvement and Staff Engagement

Providers are encouraged to strive for continuous quality improvement. Using prior reports as a baseline, staff can monitor changes in enrollment, completion, and if available, employment and earnings.

Active engagement of staff can help to support improvement and ensure compliance with complex rules and regulations. As a best practice, providers may wish to schedule regular meetings of planning and program staff to encourage buy-in, discuss improvements to work processes and outcomes, and provide education on program rules, language and expectations. The entire staff should be familiar enough with CEPP to be able to make internal referrals as needed.

WDACS requires each CEPP provider to prepare and implement a written internal staff training and succession plan policy, updated annually, including the provision of an orientation to all new staff, information sharing when only a designee attends a training, and staff training when new CEPP policies are enacted.

Identifying Potential Participants

Outreach/Enrollment Tips

1. Create outreach materials such as posters, brochures, flyers, websites, social media messages, press releases, or videos. Target your outreach messages to attract people who are eligible for CalFresh:
   1. Modify your language to build hope for future employment, tell a story, etc. If your participants tend to be sensitive to stigma, try to reduce words such as CalFresh or low-income.
   2. Highlight the benefits of the new program such as funding for participant costs.
2. Increase your existing outreach efforts in areas/forums where CalFresh recipients are more likely to be found, such as clinic health fairs.
3. Increase referrals from other agencies serving a large number of CalFresh recipients, such as CalFresh Outreach organizations and food banks.
4. Prioritize CalFresh participants for outreach and enrollment or serve CalFresh participants exclusively.
5. Set internal goals for enrollment. Ensure that all staff conducting intake are fully committed to enrolling more participants in CFET and discussing the program during each intake. Consider friendly ways to recognize staff that enroll the most people. Update staff regularly on progress toward goals and discuss enrollment strategies during staff meetings.
6. Fine-tune application assistance using tips from CEPP CalFresh Manual and CalFresh Outreach partners.
7. Ask staff to ask participants why they are not enrolling; is it due to being ineligible, stigma, lack of incentives, inability to complete the interview process, etc. Troubleshoot the problems identified.
8. Offer a more attractive package for participants that enroll in CalFresh, such as additional gas cards.
9. Use CFET dollars to add new services such as job readiness training, which may allow you to expand outreach to a larger participant pool.
10. If you serve many participants from an adjacent county, consider working with that county as well.
11. Expand CEPP to as many programs as possible within your organization.

Many providers seek to draw down additional CEPP dollars by increasing the proportion of CalFresh eligible participants served using targeted outreach. See the sidebar above for tips on increasing CEPP enrollment. Providers may *not* charge CEPP for outreach to potential participants.

Should a provider wish to increase referrals from DPSS, it may ask WDACS to cohost a presentation/training for DPSS workers on topics such as the CEPP program, services, success stories, and the referral process.

## Communications and Materials

*Website and Brochure Content*

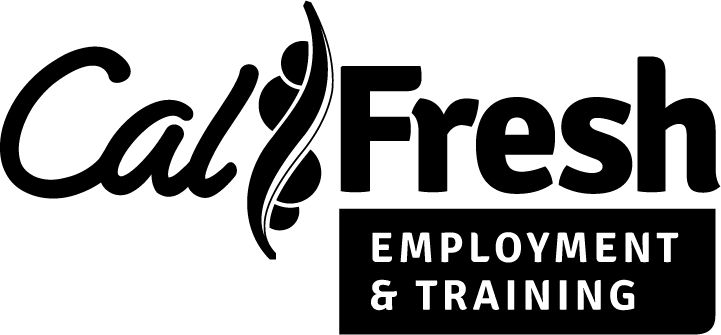
Providers are strongly encouraged to share CEPP website and brochure narrative with WDACS prior to publishing, so that WDACS can ensure the language is consistent with federal guidelines.

*Participant Stories and Media Placement*

Providers may wish to collect stories about participants whose lives have been positively impacted by CEPP and share them with WDACS for potential media placement.

*Materials*

**All materials provided to participants or the public and charged to CEPP (such as CEPP handouts, brochures, forms, and informational materials) must include the State CalFresh E&T logo in black and white or color, available from WDACS upon request**:

 Logo, company name

Description automatically generated

Materials must also contain both a USDA funding statement and nondiscrimination statement as follows:

|  |  |
| --- | --- |
| *Funding Statement* | |
| Standard | * This project has been funded at least in part with Federal funds from the U.S Department of Agriculture. The contents of this publication do not necessarily reflect the view or policies of the U.S. Department of Agriculture, nor does mention of the trade names, commercial products, or organizations imply endorsement by the U.S. Government. |
| Publications with Minimal Text or Limited Space | * Funding provided by United States Department of Agriculture; or * Funding for this project was provided by the United States Department of Agriculture. |
| *Nondiscrimination Statement* | |
| Standard | * In accordance with Federal law and U.S. Department of Agriculture policy, this institution is prohibited from discrimination on the basis of race, color, national origin, sex, age, or disability. To file a complaint of discrimination, write USDA, Director, Office of Civil Rights; Room, 326-W, Whitten Building, 1400 Independence Avenue, SW, Washington, DC 20250-9410 or call (202) 720-5964 (voice and TDD). USDA is an equal opportunity provider and employer. |
| Publications with Minimal Text or Limited Space | * USDA is an Equal Opportunity Provider, Employer, and Lender. |

## CEPP Participant Record

**CEPP providers are required to maintain a case file or similar documentation for each participant. Participant files (a combination of paper and electronic) should contain the following information**:

* Orientation
* Intake and Assessment
* Required Consent Forms
* (For example, CalFresh Confirm consent, consent to share information with referral partners)
* Employment Plan
* Case notes reflecting case management activities, reporting on participant activities and progress
* Participant Reimbursements and receipts
* Any Certificates received/obtained
* Wage verification if receiving retention services

WDACS offers guidance, templates and sample forms to meet CEPP program requirements at <https://redfworkshop.org/la-county-cfet/>. Please see Appendix E for a list of CEPP forms and documents.

Program documentation shall be maintained for a minimum of three federal fiscal years plus the current federal fiscal year (or longer if requested by county agencies) and made available for review by oversight agencies as requested.

## Civil Rights and Non-Discrimination Training

Staff and volunteers must abide by provisions of Title VI and Title VII of the Federal Civil Rights Act of 1964. Section 504 of the Rehabilitation Act of 1973, as amended, the Age Discrimination Act of 1975, the Food Stamp Act of 1977, the Americans with Disabilities Act (ADA) of 1990, Welfare and Institutions Code (WIC) Section 10000, California Department of Social Services Manual of Policies and Procedures, Division 21, and other applicable federal and state laws to ensure that employment practices and the delivery of social service programs are nondiscriminatory.  Under this requirement, CEPP providers shall not discriminate based on race, color, national origin, ancestry, political affiliation, religion, marital status, sex, age, gender, or disability.

All staff and volunteers working with CEPP participants must complete civil rights training within 30 days of a new staff hire date, or every two years for existing staff. It is recommended that the training be offered yearly for existing staff.  Providers must document the completion of this training and retain it for future monitoring visits. The WDACS Contracts Compliance Division will monitor providers to ensure Civil Rights Training is completed as well as ensure the appropriate complaints of discriminatory policies and procedures are developed and implemented.

If CEPP providers have an established Civil Rights training, the curriculum will need prior approval by WDACS.  If not, Civil Rights Training can be delivered online throughout the year through the County’s Learning Net. Provider staff will complete forms and receive a Contractor’s ID Number which will enable access to the Learning Net. Please contact WDACS to coordinate ongoing access to this training.

## Participant Complaints, Injuries and Property Damage

The CEPP provider must maintain procedures for receiving, investigating, and responding to CEPP participant complaints and handling injuries/property damage.  The following complaints should be submitted to the Economic and Business Development Department at bizdev@wdacs.lacounty.gov:

* Any accident or incident relating to CEPP services that involves injury or property damage that could result in filing of a claim or lawsuit against the provider or County.
* Any third-party claim or lawsuit filed against the provider related to CEPP services.
* Any injury to a CEPP provider employee that occurs on County property.
* Any loss, disappearance, destruction, misuse or theft of property or funds obtained through CEPP.

Within 15 business days after the Subaward effective date, the provider will need to submit to WDACS its policy for receiving, investigating and responding to CEPP participant complaints.

If WDACS requests changes in the Provider’s policy, the provider will need to make such changes and resubmit the plan within five business days for County approval.   Any changes to the provider’s policy should be submitted for review before implementation.

When participant complaints, injuries or property damage occur, the provider should:

* Maintain a log of all occurrences.
* Investigate and resolve participant complaints and notify WDACS of the status of the investigation within five business days of receiving the complaint.
* When participant complaints cannot be resolved, forward the complaint within five business days to WDACS for disposition.
* Send copies of all written responses to the participant to WDACS within three business days of transmission.

If the participant wishes to appeal the department’s decision, they may visit the California Department of Social Services link at: <https://www.cdss.ca.gov/hearing-requests>.

# **Part II. Funding and Financial Management**

## CEPP Financing Mechanism

CalFresh Employment & Training (CFET) is a sustainable, flexible federal reimbursement program that can fund CEPP planning, administration, and evaluation as well as a wide range of employment and training services and supportive services. CFET funding is also known as CEPP funding, since CEPP has a somewhat unusual finance mechanism for the pot known as 50 percent reimbursement funding. When a CEPP provider submits an invoice for allowable costs, also known as qualified agency funds, federal funds pass through multiple oversight entities and WDACS receives a 50 percent reimbursement on the provider’s costs, also known as WDACS’ “Federal Share” of the invoice. WDACS holds back 10 percent of the Federal Share for its administrative costs, and pays the remainder to the provider. The remaining 90 percent of the Federal Share, which is 45 percent of total provider costs, is known as the Federal Reimbursement. The reimbursement can be seen in this example:

Receive $45k Federal Reimb

Provide $100k in Qualified Agency Funds

Invoice Check-Cutting

Qualified agency funds must be tracked, integrated into the CEPP invoice, and meet strict compliance standards even though only some of the funds are reimbursed. Qualified agency funds must be spent on allowable costs on behalf of enrolled participants within the federal fiscal year, and costs must be necessary and reasonable to accomplish the program goals.

#### Reasonable and Necessary Costs

According to the *FNS SNAP E&T Toolkit,* “A cost is reasonable if, in its nature and amount, it does not exceed that which a prudent person would pay under the circumstances prevailing at the time the decision was made to incur this cost. Thus, *reasonable* costs provide a program benefit generally commensurate with the costs incurred, and are in proportion to other program costs for the function that the costs serve.

A cost is necessary if it is needed in the performance of the program. Thus, *necessary* costs are incurred to carry out essential functions, cannot be avoided without adversely affecting program operation, are a priority expenditure relative to other demands on availability of administrative resources and do not duplicate existing efforts.”

The federal government does not typically cap the number of people that can be served or the maximum budget that can be proposed. The budget is as large as the amount of qualified agency funds that a provider anticipates being able to spend on allowable costs.

Providers must have sufficient cash flow to pay qualified agency funds up front prior to the 45 percent reimbursement. They also must have sufficient financial stability for the reimbursement to vary from month to month, as only actual expenditures may be billed (for public entities, in-kind and donated costs can also be counted.)

Qualified agency funds can be new or from existing programs provided that funds meet program guidelines. The provider invoices WDACS monthly and certifies that it has met requirements for qualified agency funding. While the CEPP provider may enter into a subaward with WDACS for more than one year, federal funding is approved through a county CFET Plan for no more than one year at a time, and all subawards are contingent upon those annual approvals.

All qualified agency funds must come from allowable funding sources and be spent on allowable activities on behalf of enrolled participants as follows:

Qualified Agency Funds

To increase the amount of qualified agency funds available to invoice, some providers choose to prioritize CEPP-allowable activities in their program design, seek additional non-federal funding, provide CalFresh application assistance, or increase the proportion of CalFresh participants through outreach. Some providers may also choose to repurpose existing spending; for example, a provider may repurpose funds that were used for monthly incentives to fund monthly gas cards.

The following section describes allowable funding sources.

CEPP-Allowable Funding Sources

Qualified agency funds must be:[[2]](#endnote-3)

* From non-federal funding sources unless specifically allowable under federal law – Community Development Block Grant (CDBG) and Indian Tribal Organization funding are the only federal funding currently allowed.
* Not already used to meet cost sharing or matching requirements for another federal program or counted toward a Maintenance of Effort (MOE) that qualifies the state for federal funds in either the current or a prior period. For example, the funds cannot be included in the expenditures reported to meet the historical level of spending (MOE) for the Temporary Assistance to Needy Families (TANF) program.
* Not restricted to uses outside of CEPP-allowable activities.

Funding sources can include:[[3]](#endnote-4)

* Local government funds (e.g., City and County Measure H dollars).
* State government funds (e.g., AB 109 Public Safety Realignment).
* Unrestricted funds (e.g., agency general funds, earned revenue, and unrestricted donations).
* Grants and contracts (e.g., philanthropic, corporate, and government grants).
* Private donations and event revenue.
* Donated goods and services (for public agencies only).[[4]](#endnote-5)
* Goods and services from industry and non-profit partners.
* Reinvested federal funds.

All funding sources must be specifically named in each CEPP Proposal (specific funding sources as well as general categories should be listed) and may be confirmed during monitoring visits. If the original source of any government grants or contracts is not known, it is important to inquire about whether it is derived from federal dollars. Providers with current or past federal grants or contracts (other than CEPP) should ensure that any funds used to fund CEPP activities or indirect costs are separated out.

Providers may already have a variety of funding sources that can be used for qualified agency funding for CEPP. In addition, providers may be able to attract new philanthropic and corporate grants due to the opportunity for federal leveraging.

## CEPP-Allowable Costs

In addition to the requirement that qualified agency funds must be from allowable funding sources that are spent on allowable activities on behalf of enrolled participants, costs must:

* Be spent only for planning, implementing, operating, and evaluating a CEPP program.
* Be clearly described in an approved CEPP Proposal in conformity with the WDACS-Provider CEPP Subaward.
* Be reasonable and necessary to carry out the goals and objectives of the program.
* Not be charged to CEPP at a higher rate than that of other funders. For example, if a philanthropic grant allows an agency to provide a workshop for $1,000, a similar workshop cannot be charged to CEPP for $1,500. In another example, it would not be allowable for a service provider to charge CEPP for a service that is offered at no cost to non-CEPP participants if that cost is not allocated to any other grant. A program serving both CEPP and non-CEPP participants must ensure that equivalent services are charged at the same or lower rate for CEPP participants. However, differences in service packages for one funder versus another, or for CEPP vs. non-CEPP participants, may result in allowable cost variations.
* Be incurred for CEPP participants only when they are actively participating. For example, a participant cannot receive transportation costs if he or she has stopped participating in CEPP activities, because these costs are no longer necessary.
* Not be charged for non-CEPP participants. For example, a computer lab used by CEPP and non-CEPP participants cannot be fully charged to CEPP. To ensure that services to non-CEPP participants are not charged to CEPP, providers should code or otherwise identify participants as CEPP or non-CEPP, and only claim costs associated with active CEPP participants (for more information, see Part II Section 10, Time Records for Staff and Volunteers.) Costs may only be claimed for participants that are enrolled in CEPP or are in the orientation, intake and assessment phase.
* Be clearly demarcated from any unallowable costs through cost allocation or other methods described in the CEPP Provider Invoice Template.
* Not be spent on services or goods that are already available to the participant through another government program or a private source at no cost, e.g., a philanthropic grant. These costs are considered unnecessary. However, if a service or good is available but the participant cannot use it (for example, the service is not available at a time and place that the participant can attend) then this prohibition may be inapplicable.
* Follow documentation guidelines in the CEPP Provider Invoice Template and this Handbook.
* Be accorded consistent treatment. A cost must not be assigned to a federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the federal award as an indirect cost.
* Be claimed only for the federal fiscal year in which they are incurred.
* Conform to the Office of Management and Budget (OMB) Circular “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards,” 2 CFR 200, hereinafter referred to as the [OMB 2 CFR 200 Uniform Guidance](http://www.ecfr.gov/cgi-bin/text-idx?SID=d4f3d988a003c362c4ce04d6dbdb8e54&mc=true&node=pt2.1.200&rgn=div5.).
* Follow all other federal, state, and local CFET and CEPP rules, e.g., invoiced in a timely manner using the cash claiming method described below.

The use of CEPP funds is limited to those in accordance with an approved CEPP Proposal. Please see Appendices A and B and the Invoice Template for additional information on limitations of the use of CEPP Funds.

## Spending Federal Funds

While federal rules strictly define what counts as qualified agency funds, it has no restrictions whatsoever on how the provider can spend the federal reimbursement. CEPP rules apply only to costs invoiced, not reimbursed. On a local level, the federal reimbursement is expected to be spent in a way that benefits CEPP.

When the CEPP provider “reinvests” a portion of the federal reimbursement into new allowable activities and then claims costs on these new activities, the initial investment of qualified agency funds leverages federal dollars once again. The reimbursement can be reinvested in the current fiscal year and/or carried over to future fiscal years, and there is no limit to the frequency of reinvestment.

The more federal funds that are reinvested in new allowable activities, the greater the return on the original investment. If all qualified agency funds are reinvested each year, the return on investment can grow over five years to more than three times the amount when funds are not reinvested. This significant leveraging potential leads many providers to prioritize adding new allowable costs. Please see the Spending Federal Funds handout at <https://redfworkshop.org/la-county-cfet/> for more information.

## Supplantation Prohibitions and Precautions

If existing funders decide to change their current level of funding due to the availability of CEPP funding, the funding source will be disallowed. For example, if a county agency reduces a grant to a CEPP provider because it expects CEPP dollars to replace a portion of the grant, the remaining grant cannot be counted for CEPP purposes.

In addition, services cannot be charged to CEPP if they are described as available to all community members in need, regardless of whether providers have enough capacity to meet such a need. Services described as such are considered an entitlement. For example, if a community-based organization states that GED classes are available for free to all community members, the cost of providing that instruction is not allowable.

Federal rules have additional supplantation restrictions for education components. Federal funds can only be used to pay for education and supportive services offered by educational institutions if those services are above and beyond those offered to the general student body or are offered at cost. In addition, CEPP funds cannot be used to fund educational services and activities unless the costs exceed the normal cost of services to non-CEPP participants.[[5]](#endnote-6)

To confirm that supplantation has not taken place:

* The CEPP Proposal must clearly describe the funding sources for qualified agency funds.
* The provider must certify, via a signature at the bottom of each invoice, that federal funding is not supplanting existing funds.
* The full allocation of program funds must be made available for inspection during monitoring visits.

## Budget

A new line-item budget (along with budget narrative, funding sources and other calculations) is required annually for the CEPP Proposal. Once approved, it is appended to a new or continuing WDACS-Provider Subaward. Please use the templates provided by WDACS in preparing these materials.

The budget is an “up to” amount. Costs that exceed the “up to” amount will not be reimbursed, and reimbursement up to the budget amount requires allowable costs to be incurred and documented. Carryover of expenses to the next fiscal year is not allowed. Budgets must be reasonable and not an overstated projection of costs, as significant underspending may lead to increased scrutiny. If expenses are much less than anticipated over the course of the federal fiscal year and the provider expects significant underspending by the year’s end, providers should let WDACS know as soon as possible.

#### Federal Fiscal Year

The Federal Fiscal Year (FFY) begins on October 1 and runs through September 30. Fiscal years are designated by the year in which they end, rather than the one in which they begin. Fiscal Year 2022, for example, begins October 1, 2021 and ends September 30, 2022.

All budget modification requests must be submitted as soon as possible to the contract analyst no later than May 1 for each contract fiscal year.

The Line-Item Instructions tab of the CEPP Provider Invoice Template contains comprehensive information on budget line-items. See Section 9 below for guidance on cost allocations and indirect rates.

## Invoices

Providers submit monthly invoices to WDACS using the CEPP Provider Invoice Template. All CEPP costs submitted for invoice are subject to the invoice guidelines in the template, Handbook and Subaward, and must be allowable under federal and state fiscal rules, including the OMB 2 CFR 200 Uniform Guidance. CEPP providers are required to substantiate all expenses claimed on invoices upon request with accurate, detailed financial records documenting all direct expenses.

### When Costs Can Be Billed

All costs submitted for reimbursement in a month must have been paid, not simply incurred, prior to submission of the invoice. (An incurred cost is a cost for which an organization has become liable but may not have yet paid.) The one exception to this rule is payroll and benefits, which can be incurred but not paid.

Prior to billing CEPP for goods and services, the goods and services must have been received. For example, a deposit to hold a conference room for training cannot be billed until the room is actually used for the training.

Similarly, supportive services cannot be billed to CEPP until they have actually been issued to participants, as that is the point when supportive services are considered received. For example, if gas cards are purchased in bulk up front, they can only be billed after being issued to participants even though they were paid in advance. [[6]](#endnote-7) Every effort should be made to purchase bulk items in quantities that are likely to be issued within the federal fiscal year, because items that are not issued cannot be billed. For more information on Supportive Services, see Appendix A.

Individuals must maintain CalFresh and CFET enrollment to be eligible for CEPP. Invoicing for new CEPP participants may begin following determination of their CEPP effective date, which is determined after CalFresh and non-CalWORKs status is confirmed. However, these costs may later be disallowed in the unlikely event that DPSS determines the individual ineligible for CalFresh or CFET after receiving the CFET Referral and Enrollment Roster, and the provider cannot supply backup documentation from CalFresh Confirm demonstrating that the confirmation was completed correctly.

Individual participants must be enrolled in CEPP at the time that individual’s costs were incurred, not paid. Using a supportive services example, an individual can buy a textbook at a bookstore in May, the provider can reimburse the individual in June, and WDACS can be billed in July. The costs are allowable as long as the participant was enrolled in CEPP in the month of May, whether or not the individual loses eligibility in June.

If an individual’s CalFresh enrollment and non-CalWORKs status is not known prior to an invoice deadline, their costs can be billed later in the federal fiscal year. This is most likely to occur for new participants who are not yet on CalFresh but have begun the application process. These participants’ costs can be billed retroactive to their CEPP effective date (as defined in Part I Section 2B, Orientation, Intake and Assessment) once the status is confirmed. Providers may wish to designate a temporary “pending status” for such individuals to best track their costs. Care must be taken to not bill retroactively for costs that were paid in a previous federal fiscal year.

One allowable methodology for capturing costs retroactively is to simply track actual costs tied to that individual while in pending status, and bill for those costs following confirmation of status. Another method is applicable to organizations using the participant ratio approach to cost allocations, which is described below in Part II Section 10, Time Records and in the CEPP Provider Invoice Template instructions. In creating the participant ratio formula for the invoice month in which the pending status ends, the provider can count the individual as a CEPP participant more than once (once for the current month and once for each previous month in pending status following their CEPP effective date.) Cost allocation documentation for the month should clearly indicate the multi-month count in the list of names of CEPP participants in comparison to total participants. See “Sample CEPP Participant Ratio Documentation” for sample documentation.

While costs paid in the federal fiscal year may be invoiced in any month within the year, providers are strongly encouraged to invoice for all paid costs in a timely manner. Following each year’s closeout period, costs paid in that year can no longer be invoiced. However, costs incurred in the previous year can be invoiced if the costs are paid in the current year and fall within activities described in the approved CEPP Proposals or proposal revisions for both years. For example, if a copier is repaired in the month of September but the repair is paid in the month of October, the cost must be invoiced in the new FFY.

### Position Changes Mid-Year

Subject to the review and approval of WDACS, position titles that were not included in the budget narrative may be invoiced without a formal budget amendment. Providers should submit information in the cover email to the CEPP Provider Invoice Template describing the added position title and responsibilities under CEPP. Added positions must not increase the total allocated budget amount for Personnel Salary and Employee Benefits.

### Invoice Submission

For invoice submission instructions please see the CEPP Provider Invoice Template. All invoices must be reviewed and approved for payment by WDACS, which will in turn submit aggregated invoices to DPSS for its review and approval. WDACS will generally take up to 30 days to review a provider invoice and pay. CEPP providers must be prepared to pay for program costs up front, with a time delay for reimbursement.

### Invoice Adjustments

Any changes to prior paid invoices will require an adjustment, as described in the CEPP Provider Invoice Template instructions.

## Cost Allocations and Indirect Guidance for Budgets and Invoices

**Cost Allocations**

For costs that are incurred jointly by CEPP and non-CEPP programs or activities, a reasonable methodology must be developed to allocate a portion of the costs to CEPP. Costs that are commonly prorated in this way include the line-items of Building/Space, Personnel, and Non-Capital Equipment and Supplies. A Cost Allocation Plan must be pre-approved by WDACS as described in the Subaward. The cost allocation will likely change each month as the ratio of FTE or participants varies. Providers must enter any cost allocations in the Cost Allocation Methodology table in each monthly tab of the Invoice Template.

**Indirect Guidance**

Indirect costs vary by provider but typically include payroll services, accounts payable and receivable services, benefits administration, liability insurance, data services, etc. These costs may be charged to CEPP as indirect costs if they meet indirect cost guidelines. Alternatively, these costs can be treated as direct costs if they are properly cost-allocated, and in the case of staff time, if time records are submitted. Once a provider treats a given cost as direct or indirect, it must apply that treatment consistently and may not change during the federal fiscal year. For more information on indirect rates, please refer to the OMB 2 CFR 200 Uniform Guidance.

There are three federally allowable methods for determining an indirect rate:

1. **Federally-Negotiated Indirect Cost Rate Agreement:** If a CEPP provider has a current federally-negotiated indirect cost rate agreement with any cognizant federal agency, it may apply that rate in the agreement. The CEPP provider must submit the approval with the CEPP Proposal. If the indirect cost rate is provisional at that time, once the rate becomes final, the provider will need to remit any overpayment of funds to WDACS, and subject to the availability of funds WDACS agrees to remit any underpayment to the provider.
2. **De Minimis Rate:** If the provider does not have a federally-negotiated indirect cost rate agreement, has not had one in the past, *and* is not an Indian Tribal organization or agency of the state, the provider may qualify for a De Minimis rate of 10 percent of all Modified Total Direct Costs. Modified Total Direct Costs should exclude costs associated with capital equipment, building/space, subcontract amounts above the first $25,000 per subcontract per subcontract term, and supportive services. If the provider chooses to use the De Minimis rate, it must do so consistently for all federal awards until it chooses to negotiate a rate.
3. **Rate Negotiated with WDACS:** This option is not yet available in Los Angeles.

**Federal Terminology**

The USDA FNS term for all costs other than supportive services is “Administrative Costs”.

## Time Records for Staff and Volunteers

The accounting of staff costs in CEPP is quite distinct from most grant funds, in which a pre-determined cost is apportioned at regular intervals. Since CEPP is a reimbursement program, staff costs typically vary each month, due in part to the changing proportion of CEPP to non-CEPP participants as well as the varying amount of time spent on CEPP-allowable activities. For example, staff may incur more hours during monitoring visits.

All staff (and volunteers, for public agencies) must submit time records to invoice for their time, unless their time is included in an indirect rate. Invoiced time must only be for allowable activities. Staff and volunteers must be made aware of allowable activities to facilitate correct time allocations. A best practice is to create a list of allowable and unallowable activities each year based on the approved CEPP Proposal for all staff completing time records.

Time worked on CEPP should be reported in hours, and not percentage of time on the project. When accounting for salary costs, paid time off (including vacation, holiday, and sick leave) may be prorated according to the hours spent on CEPP versus total working hours.

Time records may include daily timesheets, weekly timesheets, or federally-approved Random Moment Time Studies (RMTS). RMTS require that time records be completed for one week per month or one month per quarter instead of daily or weekly. The RMTS method may only make sense for programs with consistency in staffing hours over the course of time.

Please see <https://redfworkshop.org/la-county-cfet/> for a sample Time Records Workbook with forms and instructions. The provider may use their own timesheets if they conform to the guidelines in this section and the Workbook. A timesheet template does not need pre-approval with the exception of RMTS, which needs approval by a federal agency. Providers may employ existing federally-approved RMTS templates following WDACS review.

Completed time records must be signed by the staff person. They also must be signed by their supervisor or the CEPP Program Director/Coordinator either individually or in bulk using an electronic signature.

Hours spent on CEPP may be calculated via the actual hours method, participant ratio method, or another method defined in the Cost Allocation Plan.

1. **Actual Hours:** Under this method, staff record each hour spent on allowable activities on behalf of enrolled participants. Activities that are for non-CEPP participants should not be included in the time record.To facilitate direct service staff’s inclusion of hours spent only on CEPP participants, the provider may wish to clearly delineate CEPP participants from non-CEPP participants and consider changes in CEPP status that may occur each month.

Staff using the actual hours method may prorate specific hours for joint activities, such as when planning for and providing trainings to groups that include both CEPP and non-CEPP participants. The proration should be calculated based on the percentage of CEPP participants to total participants in the group. Sign-in sheets for such events should be maintained to justify the proration.

1. **Participant Ratio** for Single Programs: Providers may choose to prorate personnel costs in one or more programs that serve CEPP and non-CEPP participants on a regular basis. Providers may wish to prorate all allowable staff time and associated benefits within a single relevant program, including time spent in management, planning and administration, individual services, and group services. The following is a best practice on cost allocations for personnel using the Participant Ratio method:

The proration used would be the same percentage for all personnel costs within the program, and would be calculated at the end of each month based on the number of CEPP participants to total participants served by the program during the month. The names of actively participating CEPP participants must be documented and kept on file for purposes of fiscal monitoring, and the proration must be entered into the invoice template.

To use the participant ratio methodology, each applicable staff person’s time record would include solely hours spent on CEPP-allowable activities, even if not conducted on behalf of CEPP participants. For example, a case manager’s time record would include all the hours spent in case management, an allowable activity, and exclude the time spent in purchasing meal tickets for participants, an unallowable activity.

All allowable hours recorded on the time record would then be prorated by fiscal staff at the time of invoice preparation to ensure that only time spent on behalf of CEPP participants is included. For example, if 50 percent of participants in the program are in CEPP, and a staff person works 38 hours on allowable activities in the program in a week, the CEPP time sheet records would report 38 hours and the proration would be done by accounting staff on the back end to claim 19 hours in personnel costs.

The participant ratio method maximizes hours on an aggregate basis only if all staff that conduct allowable activities in the relevant program submit time records. Proration of staff time on the back end ensures that the costs of staff who spend little time on CEPP is averaged out with that of staff who spent most of their time on CEPP.

For providers with more than one program that serves at least some unique participants and that wish to use the participant ratio on both, each program would calculate a distinct participant ratio as described above, as a best practice. Staff whose time is split between programs would separate the hours spent on one program from another on their time records. For example, an organization might calculate a participant ratio of 53 percent for its job readiness training and a ratio of 30 percent for its computer skills program. However, if the participants in the job readiness training are the same ones that will enter the computer skills program, the same ratio could be used.

Only one method, actual hours or participant ratio, would ideally be selected for all staff time within a single program. However, staff time outside of that program could be billed using a different method. For example, staff time within the computer skills program could be billed using a participant ratio method while time for agency-wide staff (e.g., fiscal staff, data analysts, development staff, planners, and agency leadership), could be billed using the actual hours method.

## Program and Fiscal Monitoring, Audit, and Liability

### Program and Fiscal Monitoring

The CEPP provider will receive regular program and fiscal reviews by WDACS and the County Auditor-Controller to ensure that the program is in compliance. These reviews may occasionally involve DPSS, CDSS, USDA FNS, or other oversight entities. To support programs in preparing for reviews, WDACS will provide a monitoring schedule, a sample review manual, a set of questions in advance of the review, and a process to report and resolve compliance issues.

During the review, WDACS reviewers will determine if providers have a thorough understanding of their roles and responsibilities, operate according to the established Subaward, adhere to regulations, establish adequate contractual and fiscal controls, claim reasonable costs per participant, and produce the results intended by the program.

WDACS also will monitor CEPP activities between reviews. For example, WDACS may conduct occasional site visits, and will review each invoice bundle carefully. WDACS will review provider processes to assess calculation of reimbursement funding, tracking and billing of supportive services, and other billing procedures.

### Independent Audit

CEPP providers that expend more than $750,000 in federal funds per year on CEPP and other programs combined must have a single or program-specific independent audit conducted each year in accordance with the provisions of the OMB 2 CFR 200 Uniform Guidance.

### Liability

CEPP providers are expected to follow policies that have been described in the following guidelines:

* Approved CEPP Subaward (including the federal and state requirements cited)
* Approved CEPP Proposal/Revisions and DPSS CFET plan
* CEPP Provider Handbook and Appendices
* CEPP Provider Invoice Template
* Sample CEPP Time Records Workbook
* Additional current and forthcoming guidance
* OMB 2 CFR 200 Uniform Guidance

It is recommended that CEPP providers review any amendments or addenda to these documents carefully, as CEPP activities may need to change following their release. WDACS’s required trainings will help providers maintain familiarity with policies as they evolve.

CEPP staff may nevertheless make mistakes that could result in non-reimbursable costs. In such circumstances, disallowed costs that have been reimbursed must be returned to WDACS. It is recommended that CEPP providers set aside a small amount of the federal reimbursement as a cash reserve to fund any disallowed costs.

There are three primary reasons why a cost might not be reimbursable:

* **Costs for an ineligible purpose.** The documents listed above include details of what costs may be billed. Internal staff training on these guidelines is essential, both for fiscal staff and for staff who will be making determinations about services and supportive services. Note that CEPP guidelines may not account for all possible situations. It is vital that the program develop a good line of communication with WDACS, to ask any questions that arise.
* **Costs for ineligible participants.** If a participant is not enrolled in CalFresh, CFET and CEPP, any related services or supportive services will be considered an overpayment. Therefore, checking eligibility in the manner and intervals described in this Handbook is extremely important. The provider will not be responsible for an overpayment related to enrollment if it can show documentation that enrollment was confirmed correctly and is consistent with the provider invoice—even if DPSS had been mistaken in determining CalFresh eligibility.
* **Costs not properly documented and submitted for reimbursement.** As with any funding source, CEPP costs must be documented to show that they were invoiced correctly, in accordance with program and fiscal requirements, and submitted in a timely manner. The documents listed above explain these requirements, and any additional questions can be directed to WDACS. Communication with WDACS about documentation requirements, especially early in the program, can minimize any potential problems.

## Fiscal Documentation Guidelines

Please see Appendix E and the invoice template for more information on fiscal documentation. Documentation shall be maintained by CEPP providers in accordance with requirements and guidelines of WDACS, DPSS, CDSS, and FNS. They shall also be maintained in accordance with generally accepted accounting principles such as those of the Financial Accounting Standards Board (FASB) Accounting Standards Codification, Public Company Accounting Oversight Board(PCAOB) Accounting Standards Codification, or Governmental Accounting Standards Board (GASB) Accounting Standards Codification, as applicable, and any related AICPA Industry Audit and Accounting guides.

Fiscal documentation shall be made available for program and fiscal reviews by any of these entities as requested. Documentation shall be maintained for a minimum of three years following the final payment in a given federal fiscal year (or longer if requested by county agencies).

# APPENDIX A: Service Components

A wide range of services can fit within most of these components and should align with the following. The FNS SNAP E&T Tool Kit includes a helpful description of the [components](https://redfworkshop.org/wp-content/uploads/2021/09/SNAPemployment-training-toolkit-june-2021.pdf):

* Providers must describe all services and supportive services by component in the CEPP Proposal.
* Case management must be offered to all CEPP participants as a part of each component and its costs and description should be integrated into one or more service components in the CEPP Proposal.
* CEPP providers can choose the number and type of components to offer but must offer at least one component. The Job Retention component can only be included if at least one other component is selected.
* Individual participation, start date and completion date must be tracked by component as described in the Reports section.

*CEPP Component List* The following list describes allowable components. Not all FNS defined components are available to CEPP providers and the Supervised Job Search and Job Search Training components have been merged and are now covered solely by Supervised Job Search.

Supervised Job Search

Supervised Job Search (SJS) covers a range of job search services delivered by the CEPP service provider as well as job search efforts carried out by the participant which are directly linked to increasing employment opportunities. For example, CEPP providers can offer soft skill classes, labor market information, job search training and assistance with mock interviews, resume development and master applications. Participants can attend job fairs, review job listings, apply and interview for jobs and keep a record of employer contacts.

**SJS requires at least one meeting a month with a qualified staff member to review job search activities, get feedback, troubleshoot issues, and discuss next steps**. This monthly meeting may be conducted remotely, in-person, or through a combination of both. Documenting this meeting with a case note is a best practice to confirm that the requirement is being met.

SJS may be offered independently or within a group setting at locations approved by WDACS and DPSS. Services should be tailored to the particular needs of participants and offer access to necessary participant reimbursements required for SJS participation (e.g. laptops and hotspots as needed for remote job search conducted on the internet or transportation vouchers for in-person job search).

CEPP service providers have flexibility in how they design and individualize their SJS program and should strive to offer a combination of activities that are comparable to approximately 12 hours a month of job contacts. SJS should be offered for a period of less than a year and providers should assess the option to offer a different component in cases that do not result in employment.

Workfare

Workfare is a component in which CalFresh recipients work off the value of their household’s monthly CalFresh allotment through an assignment at a private or public nonprofit agency, including community-based organizations. In lieu of wages, workfare participants receive compensation in the form of their household’s monthly benefit allotment. The primary goal of workfare is to improve employability and encourage individuals to move into regular employment while improving the community. Workfare assignments cannot replace or prevent the employment of regular employees. Workfare assignments must provide the same benefits and working conditions provided to regular employees performing comparable work for comparable hours

As part of the workfare component, a provider may establish a job search period of up to 30 days prior to sending the participant to a workfare site

In Los Angeles County, the primary goal of workfare is to ensure that ABAWDs subject to time limits once the ABAWD waiver expires will have a choice to work a more limited number of hours compared to other components to maintain CalFresh.

Self-Initiated Workfare

CEPP can fund the development and maintenance of programs for participants who locate their own workfare placements. Participants do not receive wages and are responsible for arranging to have their participation reported to their caseworkers and for verifying their workfare hours.

Work Experience

The work experience component is designed to improve the employability of household members through actual work experience or training, or both, and to enable individuals employed or trained under such programs to move promptly into regular public or private employment.

CEPP providers can develop and maintain work experience programs in the public, non-profit and private sectors. The work experience component activities must be planned, structured learning experiences that take place in a workplace for a limited period of time as appropriate to the occupation for which the participant is being trained.

Work experience may include paid or voluntary time-limited jobs that are designed to improve employability and move promptly into regular unsubsidized employment. Examples of work experience are apprenticeships, pre-apprenticeships, subsidized employment, paid or unpaid internships, work-based learning, and job-shadowing programs. Employment social enterprises are prime examples of mission-driven businesses that provide work-based learning for individuals who face barriers to work.

Work must be consistent with laws such as the [Fair Labor Standards Act](https://www.dol.gov/agencies/whd/compliance-assistance/handy-reference-guide-flsa), where work experience may not replace the employment of a regularly employed individual, and must provide the same benefits and working conditions provided to regularly employed individuals performing comparable work for comparable hours.

Work Experience is divided into two sub-components: Work Activity and Work-Based Learning:

The **Work Activity** subcomponent is performed in exchange for CalFresh benefits and provides an individual with an opportunity to acquire the general skills, knowledge, and work habits necessary to obtain employment.

The **Work-based Learning** subcomponent involves sustained interactions with industry or community professionals in real world settings to the extent practicable, or simulated environments that foster in-depth, firsthand engagement with the tasks required in a given career field. Work-based learning emphasizes employer engagement, includes specific training objectives, and leads to regular employment. Work-based learning programs may include customized training; incumbent worker training (as defined under WIOA); and internships that are part of a non-graduate school curriculum. Work-based learning can include both subsidized and unsubsidized employment models whereby E&T funds are used to subsidize the participant’s wage.

**Subsidized Work-based Learning (SWBL)**

Subsidized work-based learning (SWBL) is defined as employment in the private for-profit sector, the non-profit sector, or the public sector where a portion of an E&T participant’s wages are subsidized. These subsidized wages may or may not be reimbursed with E&T funds. SWBL activities must:

* Improve employability and enable participants to move promptly into regular public or private employment.
* Be a planned, structured learning experience that takes place in a workplace or simulated environment.
* Include sustained interactions with industry or community professionals in a real world or simulated environment.
* Foster in-depth firsthand engagement with the tasks required in a given career field.
* Be aligned with a curriculum (i.e., an instructor’s plan for providing training and skill development) and instruction.
* Emphasize employer engagement in the development and/or execution of the training.
* Have specific training objectives (i.e., goals for what a participant is expected to learn and be able to do by the completion of the training).
* Follow an articulated and documented path that leads to regular, unsubsidized employment.
* Pay the individual a wage at least equal to the State or Federal minimum wage, whichever is higher. Note this refers to the wage including the subsidy.
* Operate in compliance with all applicable labor laws
* Not displace or replace existing employment of individuals not participating in E&T.
* Provide the same benefits and working conditions as non-E&T participants doing comparable work for comparable hours.
* In addition, SWBL activities should:
* Follow an evidence-based training plan with a clearly defined skills element that aligns with the participant’s training plan.
* Be limited to six months (with exceptions for registered apprenticeships and other compelling programs).
* Permit individuals to participate only once per twelve-month period with some exceptions as described on page seven.
* Not constitute more than three percent of the workforce for private, for-profit employers and E&T providers.

Education and Vocational Training

CEPP providers can offer education programs, classes or activities that improve basic skills and literacy as well as vocational education or Career Technical Education programs and classes designed to improve the employability of participants by providing training in a skill or trade. Training topics may include but are not limited to Adult Basic Education (ABE), basic literacy, English as a Second Language (ESL), high school equivalency (such as GED, TASC, and HiSET) or high school diploma, vocational training, integrated education and training (IET) and bridge programs, and Career and Technical Education (CTE). CEPP can also fund programs that provide training in setting up and operating a small business or other self-employment venture.

Finally, CEPP can include work readiness programs that include skill assessment and educational remediation services that prepare individuals for the workplace. Work readiness skills may include both foundational and cognitive skills such as reading for information, applied mathematics, locating information, problem solving, and soft skills, which are defined as personal characteristics and behavioral skills that enhance an individual’s interactions, job performance, and career prospects.

Programs that involve articulated career pathways or stackable credentials that ultimately lead to employment are encouraged. Vocational education should ideally be employer-driven, provide the skills necessary to prepare for further education and careers in current or emerging employment sectors, and lead to industry-recognized certificates or credentials.

Examples of education activities include classes, trainings, tutoring, homework labs, academic counseling, academic support groups, workshops on study habits, and academic monitoring.

*Note:* Community colleges cannot claim the costs of classroom instruction, because classes are available to everyone through open enrollment. However, tuition and fees may be billable.

Job Retention Services

CEPP can fund job retention services designed to help achieve satisfactory performance, retain employment or increase earnings over time. Retention services must be provided for at least 30 days and no more than 90 days for those individuals who secure employment, **provided they have (a) participated in another component as part of CEPP; and (b) secured employment during or after participation in CEPP. Job retention services can include counseling, job coaching, and case management, along with optional supportive services.**

If a participant does not participate for a full month, providers may demonstrate that they have made a good faith effort to provide 30 days of service. For example, the provider may make attempts to contact and engage the participant which should be reflected case notes.

. Job retention services may be offered to households who are no longer enrolled in CalFresh (unless the individual is leaving CalFresh due to a disqualification); however, in such cases job retention services must begin no later than the month after losing CalFresh. There is no limit to the number of times an individual may receive job retention services following job turnover, as long as the individual has re-engaged with other CEPP services prior to obtaining new employment.

# **APPENDIX B: Supportive Services**

Supportive services are intended to assist participants with overcoming barriers that prevent participation in CalFresh E&T. Providers of CalFresh E&T services are required to pay directly or reimburse CalFresh E&T participants for expenses that are reasonable, necessary, and directly related to participation in CalFresh E&T upon presentation of appropriate documentation. Allowable supportive services are eligible for reimbursement at the same rate as administrative and other program related costs.

Supportive services are one of the more unique and flexible aspects of CEPP funding. Providers can choose to offer a robust package of additional supportive services or a more modest range of services based on the organization’s capacity. Supportive services cannot be held back to incentivize completion of a CEPP activity.Supportive services must be:

* Described in the approved CEPP Proposal, including the type, methodology for distribution, and any caps on cost, for the specific CEPP component an individual is participating in.
* For the direct benefit of a CEPP participant that continues to be enrolled in CalFresh and participating in the activity requiring supportive services.
* Clearly marked for the designated purpose. A gift card or similar card that can be used for other purposes is not an allowable cost.
* Reasonable in cost. See Reasonableness section below.
* Necessary for successful participation in a CEPP component. See Necessity section below.
* Properly documented and invoiced. See Documentation section below.

*Allowable Supportive Services List*

The following list describes allowable supportive services (also known as participant reimbursements or barrier removals) under CEPP. There are three categories of supportive services: dependent care, transportation, and ancillary services.

*Note:* Post-employment supportive services are allowable only if a participant has received other CEPP services prior to employment.

1. Dependent Care

Dependent care can be billed up to the actual cost of the dependent care or the Regional Market Rate, whichever is lowest.[[7]](#endnote-8) Dependent care must not include CalWORKs Stage 2 or 3 subsidies or any other federal or federally-matched funding source. Dependent care beyond what is required for participation in CEPP is not eligible for reimbursement. Dependent care may be provided for all dependents requiring care under the age of 13 unless the dependent is physically and/or mentally incapable of caring for himself or herself or is under court supervision. A participant is not entitled to the dependent care supportive service if a member of the participant’s CalFresh household provides the dependent care services.

*Note:* CalFresh regulations provide that any portion of dependent care costs that is reimbursed under this section may not be used in calculating the dependent care deduction for determining CalFresh benefits for CEPP participants.[[8]](#endnote-9)

1. Transportation

Participants may receive assistance with transportation costs such as gas cards or mileage reimbursement, bus passes, parking (including parking permits), tolls, and other relevant transportation costs. Transportation to and from jobs may also be allowed for up to 90 days following employment as a part of job retention services.

Minor automobile repairs may be allowable if the costs are reasonable and necessary, and the participant is not receiving a standard federal mileage rate of reimbursement for travel. (The standard mileage rate already includes costs for minor repairs.)

1. Ancillary Costs

Clothing and Tools

Participants may receive assistance with clothing and tools if necessary for training, work experience, interviewing, and other requirements of CEPP. Clothing and tools to maintain employment may be also allowed for up to 90 days following employment.

Driver’s License or State ID

Participants may receive help in paying for the costs of a driver’s license or State ID if it is necessary to participation in CEPP or supports increased employment opportunities for participant.

Fees

Participants may receive assistance with lab fees, permits, and other fees and costs necessary for CEPP services or employment.

Housing

Participants may receive awards no more than two months per federal fiscal year for rental assistance when the costs are necessary for participation in CEPP or work.

Internet Services

Participants may receive assistance with Internet services if necessary for participation in an approved CEPP activity or work. For example, Internet services might be necessary for a participant enrolled in an online training course through CEPP. Supportive services needed to support remote learning and other CEPP activities have been in larger demand during the pandemic.

**Computers, tablets, hot spots or cellular phones**

CEPP providers may purchase and either lend or give these items to participants when reasonable and necessary to their participation in CEPP (e.g., supervised job search or distance learning). Equipment with a per unit cost of more than $5,000 that is loaned to participants must be purchased, tracked, distributed, and disposed in accordance with federal regulations [2 CFR §200.313](https://www.law.cornell.edu/cfr/text/2/200.313).

Legal Services

Participants may receive assistance with limited legal services that are reasonable and necessary to resolve issues that would prevent CEPP recipients from participating in approved CEPP activities or work if not resolved (i.e. obtaining a work visa). Legal services may also be allowed for up to 90 days following employment.

Medical and Dental Expenses

Participants may receive assistance with the cost of eye examinations, vision correction, and purchase of eyeglasses that are reasonable and necessary, and that assist them in participating in CEPP activities or work. Costs associated with emergency or minor dental work (such as teeth cleaning) are also allowed. Medical costs required for a job, such as TB testing or physicals, are also allowed.

*Note:* Only expenses that are *not* covered by Medi-Cal or other insurers may be billed.

Personal Hygiene

Participants may receive assistance with limited personal hygiene products and services necessary to meet the appearance standards of a provider or prospective employer.

Personal Protective Equipment

Participants may receive assistance with personal protective equipment (PPE) necessary to engage in approved CEPP activities or work, when not already provided by an employer. This may include, but is not limited to, hard hats, non-slip shoes, and appropriate precautionary items, such as face coverings/shields and protective gloves, for use during the pandemic emergency as consistent with public health guidance.

Telephone Services

Participants may receive assistance with telephone services that are necessary for CEPP participation and work. For example, a participant may be required to communicate with potential employers via telephone in order to participate in the CEPP supervised job search component. The use of existing telephone service resources is highly encouraged. The California Lifeline Program is a state program that provides discounted home phone and cell phone services to eligible households and may be leveraged for CEPP participants.

Test and Course Registration Fees

Participants may receive assistance with the cost of class registration for certain courses and testing (such as CPR).

Textbooks, Training Materials, and Supplies

Participants may receive assistance with required textbooks, training materials, and reasonable school supplies necessary for participation in CEPP.

*Note:* Only those textbooks and training materials that are required, not recommended, can be claimed.

Union Dues, Licensing, and Bonding Fees

These costs may be allowable for participants before or within the first 90 days of employment.

*Unallowable Supportive Services*

The following are examples of supportive services that cannot be funded through CEPP:

* Meal tickets, food, or refreshments for individual participants or participant events.
* Incentives, gifts, or gift cards for participants.
* Payment of outstanding indebtedness, mortgages, or other repayment of loans, including previous student loans.
* Purchase of an automobile, automobile tags, other vehicles (including bicycles), or insurance.
* Stage 1 CalWORKs dependent care costs above regional market rate, or any CalWORKs Stage 2 and 3 subsidies.[[9]](#endnote-10)

*Supportive Services Caps*

The provider may wish to limit or cap the dollar amount that can be offered to participants for selected supportive services due to budget restrictions. Caps should be set with any potential rate increases in mind, such as increases in the cost of bus passes in the upcoming year.

*Supportive Services Purchase Options*

Supportive services may be purchased in bulk or individually, in advance or in arrears, through a voucher or a direct purchase, as a reimbursement directly to a provider, as a reimbursement to the participant, or as some combination of these approaches. Supportive services purchased in bulk should be charged in the fiscal year with the intent to distribute all of the items within that year.

*Timing of Disbursement of Supportive Services*

Required supportive services (described below) must be offered within the first month of participation in CEPP if indicated. For participants that begin services while in the process of applying for CalFresh, supportive services should be provided retroactive to their first month of participation once their CalFresh enrollment and non-CalWORKs status is confirmed.

The provider may issue supportive services to a participant in advance of an anticipated need, e.g., by purchasing textbooks in advance for a required course. For supportive services that are ongoing, such as transportation costs or childcare, it is recommended that a maximum of one month’s worth of supportive services be distributed in advance, so that continued eligibility and participation for each month can be confirmed before the supports are distributed.

Supportive services may be paid after a cost is incurred by the participant, e.g., as a reimbursement for a background check. Every effort should be made to make swift payments for reimbursements.

Please see Part II Section 8A, When Costs Can Be Billed, for considerations about purchasing supportive services in bulk.

*Necessity for Supportive Services*

Supportive services must be necessary to participation in CEPP or work. Supports are **not** considered necessary if:

* The participant is already receiving the support services for free.
* The supports are being paid by another program.
* The supports are optional or recommended but not required.
* The specific supports needed are not offered by the CEPP provider.
* The participant opts out.
* The participant does not need the supportive services (e.g., a bus pass is not needed if the participant lives one block from the destination site.)

*Reasonableness of Costs*

Reasonableness should be determined on a case-by-case basis by staff members. In the event of a costly support service where reasonableness may be unclear, please contact WDACS for guidance.

CEPP staff should determine the least costly fare when issuing transportation services. This may include working with MTA and other cross carriers to obtain information on reduced fares and working with participants on development of a reduced fare transportation plan. This may also include offering MTA SV TAP cards in the least costly denominations considering the number of average trips per month. The MTA customer service number is 800-464-2111. Transportation services such as limousines or bicycle purchases are generally not allowed.

*Documentation for Supportive Services*

CEPP providers should have a system and process for documenting supportive services.

Documentation can include the following for each participant:

Documentation for All Supportive Services

* Participant name.
* Item, amount, and if applicable, receipt.
* Vendor, date of purchase and name of purchaser.
* Date of issuance.
* Justification of necessity. The confirmation depends on the supportive service; for example an eviction notice, shelter documentation or hotel receipts will suffice for emergency housing purchases; a formal list of required (vs. optional) textbooks, supplies, tools or clothing will suffice for vocational training purchases; and a letter from an employer on the requirement for a TB test, uniforms, parking, or fingerprinting will suffice for subsidized or permanent employment purchases.
* Name, date and signature of authorized staff.
* Signature of participant indicating necessity, confirming that the supportive service was not already available or received elsewhere and will only be used for CEPP purposes, and confirming receipt. A copy should be made available to the participant upon request.
* Documentation that can link supportive services costs with individual participant documentation to ensure that only supportive services issued to CEPP participants are charged to CEPP. For example, an invoice charge for a bulk purchase of gas cards should be able to be verified by reviewing individual gas card documentation.

Documentation for Dependent Care Only

* Address of the dependent care provider and hours of service.

Documentation for Supportive Services Offer

* Date of offer and either documentation on the provision of supportive services or lack of need.

Documentation for Transportation Supportive Services Only

* Documentation of the need for transportation:
* For transportation costs that vary based on the number of trips, such as mileage reimbursement, gas cards, tolls, parking meters, MTA daily/weekly/monthly bus passes, or similar costs, the cost must be justified by calculating the number of required trips in advance of each new activity and developing a transportation plan accordingly. There are two methods for calculating roundtrip mileage costs:
* **Proxy Method:** For activities that occur an average of four times per month, providers may offer gas cards or a reimbursement of up to $25 per month. For activities that occur an average of eight times per month or more, providers may offer gas cards or a reimbursement of up to $50 per month. The proxy method may not be used for gas cards or reimbursement above $50 per month. Gas card amounts must be prorated for months where the activity begins or ends mid-month. Documentation is not required for mileage per trip; however, documentation of the number of trips required for participation (such as class/work schedule or employment letter), purpose of trip, and origin/destination points must be in the file.
* **Map Program:** Under this method, providers must determine and document mileage from the original and destination points through an online map (e.g., through a map program printout), and multiply that mileage by the average number of trips per month and cost per mile using up to the maximum mileage reimbursement in the CEPP Subaward. These calculations, along with documentation on the required number of trips (such as a class/work schedule or employment letter) and purpose of travel, must be documented. If more than one activity occurs in close succession on the same day, only one roundtrip may be counted. The map program only needs to be consulted once if origin and destination points remain the same throughout the CEPP program.

If the provider wishes to reimburse one-time trips separately, such as those to a job interview, documentation will be required per trip.

Invoiced travel expenses must not exceed the rates found in [www.calhr.ca.gov/‌employees/Pages/travel-reimbursements.aspx](http://www.calhr.ca.gov/employees/Pages/travel-reimbursements.aspx). The standard mileage reimbursement builds in costs such as repairs and maintenance; no supportive services may be given for repairs or maintenance if this methodology is used. The round-trip mileage method may be used for all participants, or just those with higher transportation costs, up to the maximum in the CEPP Proposal.

* If a vendor charges a fixed fee for transportation costs, such as fixed-fee parking permits or a minor vehicle repair, the need for transportation must be documented but the number of trips to CEPP activities does not need to be calculated since the cost will not change.

Please see <https://redfworkshop.org/la-county-cfet/> for sample CEPP forms for supportive services.

# APPENDIX C: CalFresh Confirm Overview

Introduction to CalFresh Confirm for SNAP E&T Providers can be found here:<https://redfworkshop.org/wp-content/uploads/2021/03/CalFresh-ET-Intro-to-CalFresh-Confirm.pdf>

CalFresh Confirm allows CalFresh E&T service providers to confirm CalFresh E&T eligibility for the current and previous twelve months. Users have the option to search for an individual or perform a batch search of multiple individuals at once. CEPP service providers must obtain an individual’s written consent before conducting a search. Consent may be collected at the time of CalFresh E&T enrollment and used over the length of the individual’s receipt of CalFresh E&T services, or until the date which the individual chooses to end consent, whichever comes first.

In order to utilize the CalFresh Confirm tool, the following information must be entered to conduct an individual or batch search:

• First and last name;

• Last four digits of Social Security Number (SSN);

• Birthdate; and

• Timeframe for results (months which should be searched).

If the information entered matches a record, the tool will return a “confirmed” result.

A “confirmed” result means that the individual is currently eligible to participate in CalFresh E&T or was previously eligible depending on the months searched.

If the tool is unable to match the individual based on the information provided, or if the recipient is ineligible, the user will receive a “cannot confirm” result and the cause will not be identified.

A “cannot confirm” result may be due to any of the following reasons:

1. The individual is not eligible for CalFresh E&T due to not being a CalFresh recipient;
2. The individual is not eligible for CalFresh E&T due to participation in California Work Opportunity and Responsibility to Kids (CalWORKs) per 7 CFR 273.7(b)(iii);
3. The individual is a CalFresh recipient, but their eligibility was only recently determined and CalFresh Confirm records have not yet been updated
4. Multiple records contained matching indicators and the individual cannot be confirmed CalFresh E&T eligible based on the information provided; or
5. The information provided is inaccurate or entered incorrectly by the user.

CalFresh Confirm data will initially be uploaded on a weekly basis beginning August 2021. Therefore, to address reason three highlighted above, it is recommended that the service provider perform another search after seven calendar days before determining that an individual is not eligible for CalFresh E&T.

CalFresh Confirm is available to the following:

1. **CWD**: A county government agency responsible for determining eligibility for public assistance programs, including CalFresh, and that voluntarily administers CalFresh E&T.
2. **Tribal Organization**: An organization who is a governing body of any Indian Tribe or legally established organization of Indians, per 34 United States Code (U.S.C) § 12291 (a)(38) and that voluntarily administers CalFresh E&T.
3. **State Partner**: An organization who has contracted with CDSS to provide CalFresh E&T services in multiple locations within California. Current state partners include the Foundation for California Community Colleges, Fresh Success Program (Fresh Success) and Center for Employment Opportunities (CEO).
4. **Contracted Partner**: An organization that contracts with a CWD, tribal organization, or state partner to provide CalFresh E&T services on its behalf and is paid by the CWD, tribal organization, or state partner to do so.
5. **Third-Party Partner (TPP)**: An organization that contracts with a CWD, tribal organization, or state partner to provide CalFresh E&T services on its behalf and provides their own non-federal funding to do so.

Contracted and Third-Party Partners

Contracted and TPPs who are seeking access to CalFresh Confirm must complete the Organization Access Form and User Access Form(s). All completed forms must be approved prior to submission to CDSS by the CWD, state partner, or tribal organization which they have an agreement with to offer CalFresh E&T services. CEPP service providers are considered Third-Party Partners (TPP) and submit completed access forms to DPSS via WDACS.

To access CalFresh Confirm, contracted and TPPs must agree to:

• Designate a CalFresh Confirm liaison

• Perform eligibility verifications for prospective and existing CalFresh E&T program participants

• Assist in user and organization usage reviews, as needed

• Submit completed CalFresh Confirm Organization Access Forms and CalFresh Confirm User Access Forms to the CWD (DPSS), state partner, or tribal organization for approval and submission to CDSS.

CalFresh Confirm Organization Access Form: https://redfworkshop.org/wp-content/uploads/2021/07/CalFresh-Confirm-Organization-Access-Form-ADA.pdf

CalFresh Confirm User Access Form: <https://redfworkshop.org/wp-content/uploads/2021/07/CalFresh-Confirm-User-Access-Form-ADA.pdf>

• Contact the CalFresh E&T CWD, state partner, or tribal organization if unexpected results are received when using CalFresh Confirm; and

• Inform the CWD, state partner, or tribal organization and immediately contact CDSS at [CalFreshConfirm@dss.ca.gov](mailto:CalFreshConfirm@dss.ca.gov) if a user account must be terminated or suspended.

# APPENDIX D: Quarterly Outcome Report Instructions

*Participants to Include in Report*

Participants must be included in the Quarterly Participant Outcome Report if they are currently enrolled in CEPP, have terminated the CEPP program within the current federal fiscal year, or have terminated the program in the prior federal fiscal year but are still in the look back period (as defined below) in the current federal fiscal year.

An individual is considered enrolled only if they have participated in CEPP orientation/assessment, been enrolled in the provider’s CEPP program, and been enrolled by DPSS in CFET. Participants that have been successfully enrolled by DPSS in CFET but have left CEPP after orientation/assessment are still considered participants and must be tracked. Conversely, individuals that have been enrolled in the provider’s CEPP program pending confirmation of CFET enrollment but have not received such confirmation are not yet considered enrolled.

*Data Records*

A data record is a collection of related classes of data (e.g., an individual’s gender, race and age) that often appear as a single row of a table. For purposes of this outcome report, a row signifies a different data record with various information on a specific participant. Every participant included in the report will have at least one data record during a given quarter, with a new data record created for that participant whenever a new component begins. For purposes of this outcome report only, orientation/assessment is considered a component (as long as CEPP enrollment has been completed). Some fields of data, such as *Name* and *Date of Birth*, are repeated when there are multiple records for the participant.

In one example, an individual has participated in orientation and assessment, and has been enrolled in CEPP by the provider. They are enrolled in work experience at enrollment. The individual will have two rows of data records, one that lists orientation/assessment in the *Component* data field and one that lists work experience in the field. In the second quarter, they begin a supervised job search component and end the work experience component. The individual will now have three data records with orientation/assessment, work experience, or supervised job search listed in the *Component* field. Once a data record is entered, it should be carried forward in each following quarter until the end of the federal fiscal year. If the “program completion date” and “program successfully completed” fields are still blank at the end of the federal fiscal year, that specific data record should be carried forward again into the next fiscal year.

*Program Start Date and Completion Date*

Providers must develop tracking systems that clearly distinguish between participation in their CEPP and non-CEPP programs. CEPP program participants must meet CalFresh and CFET eligibility requirements in order to be counted in the outcome report. For example, if a participant has been participating in a provider’s work experience program as of January but has only been enrolled in CalFresh and CEPP as of March, the start date of the CEPP work experience program is March. If an individual loses eligibility for CalFresh or CEPP in the third month of a CEPP training program, even if they continue to participate in the provider’s training program for seven months, they have ended both the component and the CEPP program in that third month.

If the participant has not been enrolled in the CEPP program for at least 90 days and either returns to the program or has simply enrolled in CalFresh once again while having consistently participated in the program outside of CEPP, a new data record must be started with a new program start date. The individual must also undergo a new CEPP orientation/assessment.

*90-Day Look Back Rule*

*Component End Date* and *Program End Date* fields indicate the last date of participation in a component and the last date of participation in the provider’s entire CEPP program. A Look Back rule was developed by USDA FNS to ensure that these two end dates are not final for 90 days in case services begin again in the interim, e.g., the person decides to come back, regains CalFresh eligibility, etc. The “look back” period begins after a participant has stopped participating in any CEPP services for any reason, e.g., they have completed the program, completed the component, lost eligibility, found a job, have unexplained absences, decided to leave, and so on. During the 90-day look back period, the completion date should remain blank. At that point, the completion date is finalized and entered as a date 90 days earlier, unless services have begun again within that period. The program end date does not include the time a participant may spend in job retention services; it is the last date of service prior to job retention services. If services begin again after the 90-day look back period, the participant would be considered new to CEPP again.

The *Program End Date* isthe last date of service prior to job retention services, and the 90-day look back should be applied to that date. Therefore, the *Component End Date* for job retention services may be later than the *Program End Date.*

Staff must set up an auditable procedure for tracking component and program completion.

*Employment and Wage Data*

Every quarter, CDSS completes a data match between the data in this outcomes report and the State of California Employment Development Department’s employment and wage data. CDSS reports to FNS annually on the results of the data match, including:

* The number of CEPP participants and former participants who are in unsubsidized employment during the second quarter after completion of participation in CEPP.
* The number and percentage of CEPP participants and former participants who are in unsubsidized employment during the fourth quarter after completion of participation in CEPP.
* The quarterly earnings of all the CEPP participants and former participants who are in unsubsidized employment during the second quarter after completion of participation in CEPP. This information should be de-identified for confidentiality purposes.
* Component and program completion

CEPP providers may be able to access provider-specific results of the data match in the future.

*Submission Instructions*

Submit the Quarterly Participant Outcome Report to WDACS as follows:

1. **Format:** Excel or Comma-Separated Values (csv) file format following the table structure shown in the form template at <https://redfworkshop.org/la-county-cfet/>.
2. **File Name:** Please use the following naming convention:

Organization name\_QOR\_submission date

*Example:* Chrysalis\_QOR\_1-15-22

1. **Date:** By the 15th of the month following the end of each quarter
2. **Secure File Transfer Protocol:** Contact WDACS Program Manager for access to secure portal and further instructions.

*Data Elements*

The following are the required data elements to be collected for every CEPP participant and recent former participant during the previous quarter.

Note: These data definitions are subject to change. Where there are conflicts between federal and state rules, federal rules take precedence unless specifically expressed below.

**Participant Outcome Reporting: Data Elements and Reporting Instructions**

| Data Field Name | Format | Can Leave Blank? Y/N | Repeat Across Participant’s Records? | Definitions | Additional Reporting Instructions and Alignment with CFET Referral and Enrollment Roster |
| --- | --- | --- | --- | --- | --- |
| SSN | 9-digit without spaces or dashes | N | Y | Numerical identifier used to track a person’s identification | *Same as Roster.* |
| County Code | 19 | N | Y | Code that signifies the County of Los Angeles |  |
| Date of Birth | MM/DD/YYYY | N | Y | The date of the participant’s birth | *Same as Roster.* |
| Sex | 01=Female, 02=Male, 98=Unknown, 99=Declined to State | N | Y | Gender of participant |  |
| E&T Component | |  | | --- | | * Supervised Job Search * Workfare * Work Experience * Education * Self-Employ. Training * Job Retention * Orientation and   Assessment | |  |  | | N | N List only one component per record. Use a second record, repeating the relevant fields from elsewhere, if the individual is participating in another component. | The component that the participant is currently participating in, or has been participating in during the 90-day look back period. | *Same as Roster except that Orientation/Assessment is not an option on the Roster and the Roster only lists components that are currently in use in the County.*  The component must be (a) one of the components from the Format column to the left that is also described in your approved CEPP Proposal as one of the component you will offer; or (b) orientation/assessment.  Orientation/assessment is a program requirement but is not an official CalFresh E&T component. However, orientation/assessment should be captured in the report using this data field.  If an individual has been unable or unwilling to begin a component but has been enrolled in your CEPP program, please count the individual in the outcome report by including a single data record that captures orientation/assessment. |
| Program Start Date | MM/DD/YYYY | N | Y unless participant leaves and returns at least 90 days later | The date the participant starts participation in your CEPP program | *Same as Roster.*  The Program Start Date should be the same date as the Program Start Date (CEPP effective date) on the CFET Referral and Enrollment Roster. If the orientation, assessment and CEPP effective date occurred on different dates, enter the last date. |
| Component Start Date | MM/DD/YYYY | N | N | The date the participant begins the component listed in this record | *Same as Roster.*  If the orientation/assessment occurs earlier than the CEPP effective date, enter the CEPP effective date. |
| Component End Date | MM/DD/YYYY | Leave blank if actively participating or within a 90-day look back period | N | The last date of participation for the component listed in this record | *Roster does not have a Look Back Period.*  Do not submit the Component End Date until at least 90 days have elapsed without any services (please refer to instructions above on the Look Back Period.) |
| Component Successfully Completed | 0=No, 1=Yes | Leave blank if actively participating or within a 90-day look back period | N | Indication of successful completion of the component listed in this record, after 90-day look back | *Roster’s “Component Status” does not have a Look Back Period or an option to leave blank. It includes an option for “active” and it does not use the “0” and “1” choices.*  Only enter “1” if the participant has completed all program requirements following a 90-day look back period. The service provider may decide what component completion entails; for example, completion of an 8-week training program might occur if the participant remained in the training for 8 weeks. If there are no specific requirements for component completion, then use “1” for all who attend. If the individual has not successfully completed and is no longer participating in the component, enter “0” following a 90-day look-back period.  Examples of successful component completion:   * Completion of all component requirements: 1 * Temporary or permanent leave: 0 * Termination of component without having met requirements because obtained a job: 0 |
| Program End Date | MM/DD/YYYY | Leave blank if actively participating or within a 90-day look back period | Y unless participant leaves and returns at least 90 days later | The last day of participation in the entire CEPP program, with the exception of job retention which is not counted in the end date | *Roster does not have a Look Back Period.*  CEPP providers may provide services to an individual following completion of a particular component only if the individual is enrolled in another component.  Do not enter this Program End Date until at least 90 days have elapsed without any services (please refer to instructions on the Look Back Period.) Once the 90-day Look Back Period has passed, each participant should have an end date whether they successfully completed or not.  If a participant has more than a 90-day gap in service, enter data as if they have completed the program and begun again. |
| Program Successfully Completed | 0=No, 1=Yes | Leave blank if actively participating or within a 90-day look back period | Y unless participant leaves and returns at least 90 days later | Indication of successful completion of the CEPP program | *Roster’s “Program Status” does not have a Look Back Period or an option to leave blank. It includes an option for “active”, “completed”, and “terminated” instead of successful completion using “0” and “1” choices. The definition of successful completion below is based in part on State guidance. Federal guidance does not have a category of successful program completion.*  Enter “1” if the participant has met all program requirements or has obtained employment, after a 90-day look back period. Otherwise enter “0”. Leave blank until the 90-day look back period is over.  Examples of program completion:   * Completion of all program requirements: 1 * Temporary or permanent leave: 0 * Termination of program because obtained a job: 1 |
| ABAWD (do not complete) | 0=No, 1=Yes | N | Y | ABAWD status at time of entry into CEPP | ABAWD status is determined by DPSS and will be completed by DPSS. |
| HSD/GED | 0=No, 1=Yes, 2=Unknown | N | Y | High School Diploma or General Education Diploma status at the time of entry into CEPP | Participant can self-report. |
| ESL | 0=No, 1=Yes | N | Y | English as a Second Language status | An individual can be ESL even if fluent in English. |
| Mandatory/ Voluntary | 0=Mandatory, 1=Voluntary | N | Y | Mandatory or voluntary status of CFET participation | In California, all participants are enrolled in CFET on a voluntary basis. Therefore, all CFET participants must be reported as a “1”. |

# APPENDIX E: Key CEPP Dates

It is recommended that the following key dates in each federal fiscal year be calendared.

October 1: Beginning of federal fiscal year and new CEPP services. Provider may wish to create/renew lists, forms and procedures based on approved proposal revision.

October 10: Quarterly Progress Report (QPR) due for last quarter of previous federal fiscal year

October 15: Quarterly Outcome Report (QOR) due for last quarter of previous federal fiscal year

January 10: Quarterly Progress Report (QPR) due for first quarter of current federal fiscal year

January 15: QOR due for first quarter of current fiscal year

April 10: Quarterly Progress Report (QPR) due for second quarter of current federal fiscal year

April 15: QOR due for second quarter of current fiscal year

April 30 (approx.): CEPP Proposal Revision (and budget template) due to WDACS for next federal fiscal year

July 10: Quarterly Progress Report (QPR) due for third quarter of current federal fiscal year

July 15: QOR due for third quarter of current federal fiscal year

September 30: End of federal fiscal year

The following are monthly requirements:

Monthly: Confirmation of ongoing enrollment in CalFresh and non-CalWORKs status

10th of each month: Submission of CFET Referral and Enrollment Roster to DPSS

15th of each month: Submission of invoice bundle to WDACS

End of each month: Submission of CEPP and non-CEPP participant list to provider fiscal staff for purposes of cost allocations (if relevant)

End of each month: Submission of staff time records to provider fiscal staff

The timeline of these annual activities may vary:

* WDACS-Provider CEPP Subaward renewal date
* Program and fiscal monitoring date

# APPENDIX F: Glossary

**ABAWD:** A CalFresh recipient in the eligibility category known as Able-Bodied Adult without Dependents.

**Applicant:** An individual who applies for CalFresh or CEPP.

**Assessment:** A non-standardized inquiry that provides information to determine whether an applicant has the required interest, skills, and capacity to benefit from Subrecipient’s CEPP program and obtain employment within a reasonable time following completion. Sample topics for assessment may include education, including literacy level; communication skills, including English-language proficiency; employment history; employment skills, abilities, and interest; and barriers to employment and steps necessary to overcome these barriers.

**CalFresh:** SNAP, as it is known in California (formerly known as Food Stamps).

**CalFresh Recipient:** An individual who receives nutrition benefits under CalFresh. All CEPP participants must be CalFresh recipients.

**CalFresh Confirm:** A state automated system for confirmation of CalFresh enrollment and non-CalWORKs status.

**CalSAWS:** The California Statewide Automated Welfare System (CalSAWS), a web-based case management and eligibility system that will be implemented for DPSS public assistance caseworkers.

**CalWORKS:** California Work Opportunity and Responsibility to Kids, also known nationally as Temporary Assistance to Needy Families (TANF).

**CDSS:** The California Department of Social Services. The CDSS CalFresh Branch is the oversight entity for CalFresh Employment & Training within California.

**CEPP:** The County of Los Angeles DPSS/WDACS CFET Expansion Pilot Program, a voluntary third-party CFET program in which WDACS serves as an intermediary for third-party partners to provide CEPP services.

**CEPP Participant:** An eligible individual who is enrolled in CalFresh, CFET and the CEPP program and is receiving allowable services.

**CEPP Pilot:** A CEPP program that operates during the pilot years of CEPP implementation.

**CEPP Program:** A program that includes CEPP services and supportive services.

**CEPP Provider:** An entity that operates a CEPP program.

**CEPP Provider Invoice Template:** An Excel document with instructions and a template to submit monthly invoices.

**CFAP:** The California Food Assistance Program, a state-funded program parallel to CalFresh for certain qualifying immigrants.

**CFET:** The CalFresh Employment & Training (CFET) program, a program within CalFresh. CFET offers flexible, sustainable federal funding designed to increase the employability of CalFresh recipients. CEPP is a program of CFET. All CEPP participants must be enrolled in CEPP, CFET, and CalFresh.

**CEPP Component:** A service, activity, or program defined under CFET rules that is designed to help participants gain skills, training or work experience that will increase their ability to obtain regular employment and achieve self-sufficiency. CEPP programs must offer at least one CEPP component.

**CEPP Reimbursement:** The reimbursement of 45 percent of total invoiced costs to the CEPP provider after a WDACS hold back of 10% of the Federal Share.

**CEPP Proposal:** A proposal submitted by a CEPP provider that will be integrated by DPSS into its CFET Plan to CDSS for approval.

**CFET Plan:** A plan submitted by DPSS to CDSS and CDSS to USDA FNS which, if approved, provides authority to all entities named within the plan to provide services described and budgeted within the plan, as long as funding has been allocated and other requirements are met.

**Child-Only TANF:** A TANF case is one in which no adult is included in the cash grant.

**Component:** A service, activity, or program designed to help participants gain skills, training or work experience that will increase their ability to obtain regular employment and achieve self-sufficiency.

**DPSS:** The County of Los Angeles Department of Public Social Services (DPSS), which serves asthe county oversight entity for the DPSS/WDACS CFET Expansion Pilot Program.

**Enrollment:** A process of formal designation by oversight entities that permits an individual to participate in one of three programs: CalFresh, CFET, or CEPP.

**Federal Share:** The federal 50 percent reimbursement of the CEPP invoice prior to the WDACS hold back.

**MOU:** Memorandum of Understanding.

**Provider Determination:** A determination by a CEPP provider that a participant is not a good fit for a particular component. The provider may make a Provider Determination from the time a participant is referred to or enrolled in CEPP until completion of the program and must inform DPSS.

**Qualified Agency Funds:** Agency funds from allowable funding sources that are spent on allowable activities on behalf of CEPP participants and meet other federal qualification rules.

**Supportive Services:** Goods and purchased services (also known as barrier removals or participant reimbursements) that are necessary for a participant to successfully engage in or complete a CEPP activity. Examples include transportation to trainings and tools necessary to engage in or complete a vocational skills class.

**SNAP:** Supplemental Nutrition Assistance Program, known as CalFresh in California, a federal program through the United States Department of Agriculture (USDA) Food and Nutrition Service (FNS) that provides nutrition benefits in the form of an EBT card.

**TANF:** Temporary Assistance for Needy Families, a federally funded program that provides cash assistance to very low-income families that include at least one child under the age of nineteen (19) and at least one parent who is unemployed, disabled, not around to care for the child, incarcerated, or deceased. CalWORKs in California is a TANF program.

**Third-Party Partner or Third-Party Provider:** A service provider which is not the CFET oversight agency and provides its own qualified agency funds to support CFET service provision.

**WDACS:** The County of Los Angeles Department of Workforce Development, Aging and Community Services (WDACS), which serves as the intermediary for the DPSS/WDACS CFET Expansion Pilot Program.

**USDA FNS:** United States Department of Agriculture Food and Nutrition Service (USDA FNS), which serves as the oversight entity for CalFresh Employment & Training nationally.

**YBN:** The online application portal for CalFresh and other public benefits in Los Angeles County, which links to the predecessor for CalSAWS known as the Leader Replacement System.

# Endnotes

1. Information about service component guidelines can be found under 7 CFR 273.7 (e)(1), or go to [Electronic Code of Federal Regulations](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=3a1f1d42053b492345d778ffdc96085d&mc=true&n=pt7.4.273&r=PART&ty=HTML#se7.4.273_17). [↑](#endnote-ref-2)
2. For more information about allowable sources of qualified agency funds, please see part 7 of the Code of Federal Regulations (CFR), Section 277 – Payments of Certain Administrative Costs of State Agencies (7 CFR 277). [↑](#endnote-ref-3)
3. As specified under 7CFR 277.4(e), the value of services rendered or the value of goods donated by private, third parties, including volunteer services, are not allowable for reimbursement purposes under the Food Stamp Program (CalFresh). However, under federal regulations described under 7CFR 272.3, California has secured a waiver from the provisions of 7 CFR 277.4(e) and permits the sources of funding described in this section. [↑](#endnote-ref-4)
4. Please refer to the USDA Q&A of May 2006 at <http://www.fns.usda.gov/sites/default/files/052306_0.pdf> for more information. [↑](#endnote-ref-5)
5. Federal regulations regarding the use of federal funds to operate educational components can be found in the Code of Federal Regulations under 7 CFR 273.7(d)(1)(ii)(C) and 7 CFR 273.7(e)(1)(vi). For more information, go to [Electronic Code of Federal Regulations](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=3a1f1d42053b492345d778ffdc96085d&mc=true&n=pt7.4.273&r=PART&ty=HTML). [↑](#endnote-ref-6)
6. Department of Social Services County Fiscal Letter (CFL) Numbers [06/07-06](file:///C:/Users/Aimee%20Chitayat/Desktop/Dropbox/SNAP%20E%26T%20Umbrella%20for%20TA/Handbooks/Handbook%20DPSS-WDACS/(http:/www.dss.cahwnet.gov/lettersnotices/entres/getinfo/cfl06/pdf/06-07_06.pdf) and [CFL 19/20-05](https://www.cdss.ca.gov/Portals/9/Additional-Resources/Letters-and-Notices/CFLs/2019/19-20-05_ES.pdf?ver=2019-10-04-140941-067). [↑](#endnote-ref-7)
7. For information about the regulations related to child care costs as part of Supportive Services, go to 7 CFR 273.7(d)(4)(i) at [Electronic Code of Federal Regulations](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=3a1f1d42053b492345d778ffdc96085d&mc=true&n=pt7.4.273&r=PART&ty=HTML). [↑](#endnote-ref-8)
8. Federal regulations regarding the reimbursement of dependent care costs, and the rules regarding the calculation of dependent care deductions for determining Food Stamp benefits can be found under 7 CFR 273.7(d)(4)(iv) and 7 CFR 273.9(d)(4). For more information, go to [Electronic Code of Federal Regulations](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=3a1f1d42053b492345d778ffdc96085d&mc=true&n=pt7.4.273&r=PART&ty=HTML). [↑](#endnote-ref-9)
9. The CalWORKs Child Care Program is administered in three stages. Stage One is administered by DPSS. Stages Two and Three are administered by Alternative Payment Program (APP) agencies under contract with the California Department of Education (CDE). The three stages of CalWORKs child care are defined as follows:

   Stage One begins with a family's entry into the CalWORKs program. Participants leave Stage One after six months or when their situation is stable, and when there is a slot available in Stage Two or Three. Stage Two begins after six months or after a recipient's work or work activity has stabilized, or when the family is transitioning off aid. Participants may continue to receive child care in Stage Two up to two years after they are no longer eligible for aid. Stage Three begins when a funded space is available and when the participant has acquired the 24 months of child care, after transitioning off aid (for former CalWORKs recipients). [↑](#endnote-ref-10)