



A Tradition of Stewardship
A Commitment to Service

NAPA COUNTY HEALTH AND HUMAN SERVICES AGENCY
Self Sufficiency Services Division

POLICY AND PROCEDURE:

Good Cause Status Determination

REVIEW FREQUENCY:

Every two years

POLICY # 2000601-2004-20

DISTRIBUTION:

- | | |
|---|--|
| <input checked="" type="checkbox"/> Employment Services | <input type="checkbox"/> Eligibility Services |
| | <input checked="" type="checkbox"/> Quality Mgmt |

EFFECTIVE DATE: February 7, 2001

ORIGINAL DATE OF ISSUE: February 7, 2001

LAST REVISION DATE: July 17, 2020

APPROVAL: Teresa Brown 7/21/20
 Employment Services Manager Date

APPROVAL: Lynn Perez 7/23/20
 SSSD Deputy Director Date

APPROVAL: Quinn Smith 7-24-2020
 HHSA Director Date

POLICY STATEMENT:

It is the policy of the Napa County Health and Human Services Agency to review if good cause exists for a participant who is not participating in Welfare-to-Work (WTW) to ensure a participant is not being sanctioned inappropriately.

ADMINISTRATION:

Employment Services Worker (ESW)

DEFINITIONS:

None

END OF POLICY

PROCEDURE

I. Good Cause Due To Lack of Necessary Child Care Supportive Services

- A. Good Cause due to lack of child care exists when one of the following occurs:
1. Licensed or license-exempt child care is not reasonably available during the participant's hours of training or employment, including commute time.
 2. Child care arrangements have broken down or have been interrupted for a child 10 years of age or younger.
 3. Child care arrangements have broken down or have been interrupted for a child who is in foster care or is an SSI recipient and who is not included in the assistance unit.
 4. Child care arrangements have broken down or have been interrupted for a child 11 years of age or older who meets one of the following conditions:
 - a. Child requires child care because he/she is physically or mentally incapable of caring for him/herself based on a written statement of a physician or licensed/certified psychologist or in receipt of SSI/SSP
 - b. Child is under court supervision as specified in W & I code section [300](#), [301](#), [601](#), [602](#)
- B. Good cause for lack of child care for any of the above reasons includes the lack of suitable special needs child care for children with identified special needs including, but not limited to, disabilities or chronic illness.
- C. Reasonably available means that:
1. There is at least one appropriate, suitable and affordable child care arrangement that is commonly available in the participant's community to a person not receiving aid, and
 2. The child care is within a reasonable distance from the participant's home or work site, and
 3. The child care is available to parents during the hours that they are required to participate in county approved activities or employment,
 - a. For participants who work a night shift or split shift, child care is not considered available if the participant cannot locate a provider for their work hours
- D. Appropriate and suitable child care is child care that meets the needs of the child and parent and meets one of the following requirements:
1. Child care that is licensed for the appropriate age group or special needs category.
 2. License exempt child care that meets the Trustline clearance requirements unless exempt from Trustline.
 3. Suitable child care provided by the parent, legal guardian, other member of the assistance unit, or an eligible provider as defined in MPP Section [47-260](#).
 - a. Payment shall not be made for child care when it is provided by the parents, legal guardians, or members of the assistance unit.
 - b. Informal child care is unsuitable where the individual(s) providing the care cannot be Trustline registered (MPP Section [47-600](#)) or who would otherwise be denied payment for child care services that are exempt from licensure, due to a violent felony conviction. (MPP Section [47-620.2](#))
- E. Affordable child care is child care where the unreimbursed cost to the family does not exceed the family fees established by the state, per MPP Section [47-401.7](#) and [.8](#).
- F. Reasonable distance means the distance customarily traveled by working families in accessing child care services in the community.
1. The reasonable distance between the participant's home and the child care provider for residents of Napa County is up to 20 miles one way.

- G. Participants shall meet with the child care resource and referral agency, Community Resources for Children (CRC) and explore all potential child care providers that meet the above criteria.
 - 1. If after exploring all childcare options it is determined by the participant and the ESW that no appropriate, suitable, affordable and available childcare can be located and the determination is documented in the C-IV journal then good cause for not participating in Welfare-to-Work (WTW) activities may be allowed.
 - a. Determination by the ESW shall only be made after CRC has informed the ESW of no available childcare and the ESW has explored all other available options with the participant.
 - 1) WTW Analyst shall be notified when there is no available childcare through CRC.

II. Good Cause Due To Lack of Transportation Supportive Services

- A. Participants shall have good cause for not participating in WTW activities if transportation is not available for any of the following reasons:
 - 1. Participant has no vehicle and there is no public transportation available.
 - 2. No other mode of transportation is available, such as ride sharing, biking, walking, or carpooling.
 - 3. The time to commute roundtrip to assigned WTW activities, using private or public transportation, exceeds 2 hours excluding the time necessary to transport family members to school or a place providing care.
- B. A work experience placement at a site that is accessible to the participant shall be considered before allowing good cause due to lack of transportation.

III. Good Cause Due To Domestic Abuse

- A. Domestic abuse means assaultive or coercive behavior which includes physical abuse, sexual abuse, psychological abuse, economic control, stalking, isolation, and threats or other types of coercive behaviors occurring within a domestic relationship.
- B. Certain program requirements may be waived for victims of domestic abuse. These include:
 - 1. 48 month CalWORKs time limit
 - 2. WTW activity participation requirements
- C. Program requirements are waived on a case-by-case basis and only for as long as the domestic abuse prevents the participant from obtaining employment or participating in WTW activities. (see Domestic Abuse Procedure)
- D. In allowing good cause due to domestic abuse, the following criteria are considered:
 - 1. Participants who are past or present victims of abuse are not placed at further risk or unfairly penalized by the CalWORKs WTW requirements and procedures.
 - 2. Program requirements are not created or applied in such a way as to encourage a victim to remain with the abuser, and
 - 3. Participation by CalWORKs recipients in WTW activities is encouraged, to the full extent of their abilities, including participation in counseling and treatment programs, as appropriate, to enable the participant to obtain unsubsidized employment.
- E. Situations that may constitute good cause for victims of domestic abuse include, but are not limited to:
 - 1. The participant is fleeing the abuser and is in temporary housing or is homeless,
 - 2. The participant has entered a shelter,
 - 3. The participant is concerned about the safety of their children,

4. The participant is a party to a restraining order or divorce action against the abuser,
 5. The participant and/or the children are undergoing counseling to cope with the effects of the abuse,
 6. Attending WTW activities, such as Job Search, that take place at public facilities would expose the participant to danger,
 7. The participant must be available to accompany children to and from school in order to avoid contact of the abuser with the children.
- F. All participants being reviewed for good cause due to domestic violence, shall be reviewed for referral to the Family Stabilization program.

IV. Other Potential Good Cause Reasons

- A. Other Conditions that may be considered good cause for not participating in WTW activities include, but are not limited to, the following:
1. Illness/Injury
 - a. A participant may be temporarily excused from participation if the ESW determines that the participant is temporarily ill or injured.
 - b. A pregnant person may be given good cause from participating for temporary illness.
 - 1) Example may include a pregnant person unable to ride a bus to attend an activity or attend an activity due to severe morning sickness.
 2. Court / Incarceration
 - a. The participant is required to appear in court or is temporarily incarcerated
 3. Family Crisis
 - a. The individual is experiencing a family crisis or change of individual or family circumstances, such as:
 - 1) Death of a spouse, parent, grandparent, sibling, or child
 - i. When the ESW is notified that a child in the Assistance Unit has deceased, the ESW shall provide automatic good cause to the parent(s) for the month of the death and the month following the death.
 - 2) Illness of a spouse, parent, grandparent, or child which requires the participant's immediate attention.
 4. Job Loss
 - a. Refer to the WTW Program Non-Compliance procedure to review for good cause reasons for Job Quit.
 - b. Review for good cause for not participating, temporarily, in WTW when the following occurs:
 - 1) The job loss affects the participant's physical or mental health; **and**
 - 2) The affected physical or mental health issue significantly impacts the participant's ability to participate in WTW; **and**
 - 3) It lasts for thirty (30) calendar days or less.
 5. Homelessness
 - a. Participants' shall be reviewed for a referral to the Family Stabilization program prior to being reviewed for good cause.
 - b. A participant may qualify for good cause while homeless when the following occurs:
 - 1) The participant is staying in a shelter, vehicle, or is street homeless; **and**
 - 2) The participant does not qualify to participate in the Family Stabilization program or opts to not participate in the Family Stabilization program; **and**

- 3) The participant's homeless situation significantly and directly impacts the participant's ability to participate in WTW activities.
- B. Prior to issuing good cause for any of these above listed reasons, the ESW should determine whether or not the "Excused Absence" criterion was met. Excused absences, if applicable, should be used prior to issuing a good cause due to "Other Reasons." (Refer to Work Verification Procedure for information on Excused Absences).

V. Determination, Verification and Review of Good Cause

- A. The ESW shall evaluate the participant's circumstance for good cause when:
1. The participant indicates that an issue exists and requests a good cause determination.
 2. The participant is not fully participating in their assigned WTW activity.
 3. The ESW learns of issues the participant has not formerly divulged.
 4. The ESW believes that good cause may exist and confirms and verifies with the participant.
- B. The participant is required to cooperate in providing verification, including written documentation, of the circumstance being considered for good cause.
- C. ESW will assist the participant in obtaining any verification that is not readily accessible by the participant and cannot be pursued by the participant due to the circumstance under consideration.
- D. A sworn statement may be accepted in the situation that verification is unable to be obtained after all attempts in Section V.A-C. have been attempted.
- E. All good cause determinations will have a review date which corresponds with the verified or expected duration of the circumstance.
1. Participants in good cause status shall be contacted at least monthly to see if they are making progress in addressing the good cause circumstance and to determine if a change in the participant's situation has occurred which impacts the good cause determination.
 2. When the household reports any change, the ESW will evaluate the change to determine if it impacts the reason that good cause was allowed.
 3. All contacts and determinations shall be documented in the C-IV journal.

VI. C-IV Input

- A. The ESW will make all appropriate C-IV entries to record the participant's good cause status, the date of review and to document the good cause determination.
- B. Update the WTW Status to Good Cause
1. All activities must be closed on the Customer Activities List page before the Program Status is changed to a good cause status
 2. On the WTW Status List, click "Add Status" under the "Program" section.
 - a. On the WTW Status Detail Page
 - 1) Status = Good Cause
 - 2) The specific good cause criteria is selected in the status reason field.
 - 3) Pregnant or Parenting Teen = Only answer if the person is Cal-Learn
 - 4) Enter begin date of the good cause
 - 5) Click Save and Return
 3. Update the good cause review date by clicking "Edit" on the WTW Status List Page
- C. Complete a journal entry
1. Short Description = Good Cause Determination
- D. Currently if a participant is participating in any activity, the WTW Status will need to be changed to "Active" in order to allow for an activity to be created and supportive services issued.

REFERENCES:

[ACL 09-46](#) – Short Term Changes Implementation

[ACL 10-37](#) – Emergency Regulations for Short Term Good Cause Due to Lack of Supportive Services
Family Stabilization Procedure

MPP [42-302.2\(k\)](#)

MPP [42-713](#)

MPP [42-721.3](#)

SDT Newsflash – WTW Pregnancy Exemption

Work Verification Procedure

WTW Program Non-Compliance Procedure

FORMS

None

CONTACT PERSON(S):

Shanna Gardner, Staff Services Analyst

END OF PROCEDURE

REVISION HISTORY:

Revision	Date	Description of Change	Requested By
1.0	12-08-11	Biennial review. Updated with C-IV input information	S. Gardner, SSA
2.0	03-26-15	Biennial review. Updated to include Good Cause for "Other" reasons.	S. Gardner, SSA
3.0	11-28-17	Biennial review. Added ACIN I-13-16. Renamed to Good Cause Status Determination	S. Gardner, SSA
4.0	07-17-20	Biennial Review. Added SDT Newsflash on pregnancy	S. Gardner, SSA