



A Tradition of Stewardship
A Commitment to Service

NAPA COUNTY HEALTH AND HUMAN SERVICES AGENCY
Self Sufficiency Services Division

POLICY AND PROCEDURE:

Satisfactory Progress in WTW

REVIEW FREQUENCY:

Every two years

POLICY # 2000601-2029-19

DISTRIBUTION:

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

EFFECTIVE DATE: January 26, 2017
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APPROVAL: Teresa [Signature] 6/4/19
 Employment Services Manager Date

APPROVAL: [Signature] 6/11/19
 SSSD Deputy Director Date

APPROVAL: [Signature] 6-12-19
 HHS Director Date

POLICY STATEMENT:

It is the policy of the Napa County Health and Human Services Agency (NCHHSA) to ensure that all participants meet his/her Welfare-to-Work (WTW) requirements and maintain satisfactory progress in those WTW activities.

ADMINISTRATION:

Employment Services Worker (ESW)

DEFINITIONS:

None

END OF POLICY

PROCEDURE

I. Criteria

- A. All WTW participants who are required to participate in WTW or volunteer to participate in WTW must fully participate in WTW approvable activities as outlined in the WTW 2 – WTW Plan Activity Assignment and/or the WTW Action Plan and make satisfactory progress to meet:
 - 1. The 20/30/35 hourly participation requirement, **and**
 - 2. The attendance requirements as set by the ESW, other service provider, and/or school being attended, **and**
 - 3. The specific criteria set in this procedure, **and**
 - 4. The final employment goal.
- B. The ESW must inform the participant of the standards for meeting regular attendance and satisfactory progress requirements for the activity(ies) to which the participant is assigned.
 - 1. This must be included in the WTW 2 and WTW Action Plan.

II. Determining Satisfactory Progress

- A. Job Search / Job Readiness
 - 1. To make satisfactory progress in the Job Search / Job Readiness Activity, the participant must:
 - a. Create or update an employment résumé.
 - b. Post résumé on an employment site on the Internet.
 - c. Actively seek employment by submitting résumé and/or job application(s) to suitable employers listed on the Internet or in any other job listings.
 - d. Pursue any employment possibilities encountered by means of interviewing for positions when possible, making calls on job leads, and actively making themselves available for employment opportunities.
 - 1) This includes securing transportation and child care if needed, and exploring all possibilities for employment such as evening or weekend shifts.
- B. Education or Training
 - 1. Satisfactory participation in an undergraduate or certificate program is determined by both the ESW and school or training site, with the ESW having the final decision for determining satisfactory progress.
 - 2. The participant must meet scholastic and attendance requirements to the degree that the education or training provider determines that satisfactory progress is met.
 - 3. The provider's evaluation/determination will be considered by the ESW, along with hourly participation requirements to determine if a participant is making satisfactory progress.
- C. Work Experience
 - 1. The skills which need to be developed or enhanced, along with the other performance expectations by the provider, will be clearly outlined in the WTW 2 and/or work experience contract.
 - 2. Participation progress will be evaluated by work experience providers.
 - 3. The evaluation made by work experience providers, attendance requirements, along with the participant's own evaluation of progress will be considered by the ESW when making the final determination of satisfactory progress.
- D. Unsubsidized / Subsidized Employment
 - 1. To make satisfactory progress in an unsubsidized and/or subsidized employment activity, the participant must:

- a. Meet required participation hours in the activity
 - b. Be obtaining skills and/or experience that will lead to employment that provides for self-sufficiency.
 - c. Continue Employment unless the employer or employment meets one of the below issues:
 - 1) The employment, offer of employment, activity, or training discriminates in terms of age, sex, race, religion, national origin, or physical or mental disability.
 - 2) Employment or offer of employment exceeds the daily or weekly hours of work customary to the occupation.
 - 3) The employment, offer of employment, activity, or training is remote from the participant's home because either:
 - i. Round trip travel time exceeds a total of two hours, exclusive of the time necessary to transport family members to school or child care, **or**
 - ii. Walking is the only available means of transportation and the round trip is more than two miles, exclusive of the distance necessary to transport family members to school or child care.
 - 4) The employment, offer of employment, activity, or training involves conditions that are in violation of applicable health and safety standards.
 - 5) The employment, offer of employment, or work activity does not provide worker's compensation insurance.
 - d. Continue employment at same level of earnings, or greater, as when employment was accepted.
 - 1) Participant is excluded from this requirement if the employer was the reason for the decrease in earnings.
- E. Treatment / Counseling Services
- 1. When it is determined that participation in Mental Health, Substance Abuse, and/or Domestic Violence services will be the only, or concurrent activity, the ESW will work closely with the service provider(s) to determine that satisfactory progress is occurring.
 - 2. The evaluation of the service provider(s), the participant's own evaluation of progress, and the ESW's evaluation will all be considered to make the final determination of satisfactory progress.

III. Evaluating Satisfactory Progress

- A. The ESW is responsible for continuous review and evaluation of a participant's progress in the assigned activity(ies).
 - 1. All new activities must be reviewed within three (3) working days of the activity start.
 - a. Activity should be moved from referred "RE" status to the actual status of the activity participation.
 - 2. Job Search activities must be reviewed for satisfactory progress a minimum of once per week.
 - 3. Employment activities, in which hours are being projected, must be reviewed at minimum by the next reporting period.
 - 4. All other activities must be reviewed for satisfactory progress a minimum of once per month.
- B. If applicable, participation in concurrent WTW activities will be considered in deciding whether adequate participation is occurring.
- C. The review of satisfactory progress shall be documented in the C-IV Journal Entry.
 - 1. Information to be included in the C-IV Journal Entry shall include, but is not limited to:

- a. Information obtained to make determination
- b. Determination outcome (satisfactory progress or not)
- c. Action taken, if applicable
- d. Next review date

IV. Lack of Satisfactory Progress

- A. If the participant is not making satisfactory progress, the ESW will:
1. Determine if the participant should be exempt from the WTW program.
 - a. Provide the participant with a CW 2186A - CW Exemption Request Form and CW 61- Authorization to Release Medical Information if participant requests an exemption review or the ESW determines the lack of satisfactory progress is due to a medical problem
 2. Determine if the participant was not making satisfactory progress due to a learning problem.
 - a. ESW will discuss and refer the participant to the Learning Disabilities (LD) Evaluation, if not already completed.
 - b. If the participant has previously been determined to have a learning disability and the disability cannot be remediated with learning disability services or physical disability accommodations and the participant does not meet any of the good cause provisions, the participant should be considered for an alternate activity, consistent with the participant's assessment and employment goal.
 - c. If participant refuses to complete an LD evaluation, the ESW will review for another appropriate activity, and if none available initiate non-compliance.
 3. Determine if the participant was not making satisfactory progress due to English language barriers.
 - a. ESW will discuss and refer the participant to English as a Second Language (ESL) classes as appropriate.
 4. Determine if the participant shall be excused from WTW participation due to good cause.
 - a. Refer to the Good Cause Determination Procedure.
 5. Determine if the participant is currently experiencing a crisis and review for referral to the Family Stabilization Program.
 - a. Refer to the Family Stabilization Program procedure.
 6. Engage the participant to assess whether additional resources are needed or an alternate activity is required. Revise the WTW 2 and/or WTW Action Plan to reassign the participant to a more suitable activity based upon the identified strengths of the participant using information received.
 - a. When applicable and if appropriate, with the permission of the participant, obtain input from the work site supervisor or school counselor regarding the suggestions or options that may enhance the likelihood of the participant's success.
 - 1) An ABCDM 228 – Release of Information must be on file to talk to a provider.
 - b. Example: Jane has very good attendance and effort when she works for a small graphics art business and 75 percent of the time is spent typing. Despite additional typing training, Jane is unable to type 65 words per minute, as the job requires. As a result, she is laid off by her employer. Although she is considered to not have made satisfactory progress, this would not trigger non-compliance. Rather, the ESW will reassess Jane's skill set and abilities to see what appropriate activity she would be assigned to help her become successful.

- B. If the participant does not meet any of the above criteria, then non-compliance shall be initiated upon determination of lack of making satisfactory progress.
1. Refer to the WTW Program Non Compliance procedure

REFERENCES:

ACIN [I-13-11](#) – CW Supportive Services, Satisfactory Progress, and Financial Aid
 ACL [15-80](#) – CW Program Requirements: Satisfactory Progress Determination
 Good Cause Determination Procedure
 MPP [42-711.8](#)
 WTW Program Non-Compliance Procedure

FORMS

ABCDM 228 – Applicant’s Authorization for Release of Information
 CW 2186A - CW Exemption Request Form
 CW 61 - Authorization to Release Medical Information
 WTW 2 – WTW Plan Activity Assignment
 WTW Action Plan

CONTACT PERSON(S):

Shanna Gardner, Staff Services Analyst

END OF PROCEDURE

REVISION HISTORY:

Revision	Date	Description of Change	Requested By
0.0	01-26-17	Procedure Created. Sent out for 60 day working draft	S. Gardner, SSA
0.1	05-02-17	Procedure Finalized & Released. No process changes made.	S. Gardner, SSA
1.0	05-30-19	Biennial Review. Updated to review for Family Stabilization in the instance of not making satisfactory progress.	S. Gardner, SSA