



A Tradition of Stewardship  
A Commitment to Service

NAPA COUNTY HEALTH AND HUMAN SERVICES AGENCY  
Self Sufficiency Services Division

**POLICY AND PROCEDURE:**

**24 Month WTW Timeclock**

**REVIEW FREQUENCY:**

Every two years

POLICY # 2000601-2026-19

**DISTRIBUTION:**

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

EFFECTIVE DATE: January 1, 2013  
 ORIGINAL DATE OF ISSUE: January 12, 2016  
 LAST REVISION DATE: March 29, 2019

APPROVAL: *Janice Bancheta* 4/9/19  
 Eligibility Services Manager Date

APPROVAL: *Teresa Brown* 4/8/19  
 Employment Services Manager Date

APPROVAL: *Lynn Perry* 4/8/19  
 SSSD Deputy Director Date

APPROVAL: *Julie Harms* 4-9-19  
 HHSA Director Date

**POLICY STATEMENT:**

It is the policy of the Napa County Health and Human Services Agency (NCHHSA) to ensure that participants receive the proper services to assist in his/her path to self-sufficiency and to notify these participants of the amount of time they have left on their Welfare-to-Work 24-month time clock (WTW 24-MTC).

**ADMINISTRATION:**

Eligibility Worker (EW)  
Employment Services Worker (ESW)

**DEFINITIONS:**

**WTW Plan** - The WTW Plan, when referenced, refers to the post-assessment plan developed with the participant. In C-IV it is identified as the Action Plan.

**END OF POLICY**

## PROCEDURE

### **I. Time Limit Requirements**

- A. The WTW 24-MTC was established for the following purposes
  - 1. Remove core/non-core activity requirements to increase flexibility in WTW activities
  - 2. Allow opportunities for barrier removal services
- B. The WTW 24-MTC is cumulative, not consecutive.
- C. If a participant reaches his/her 48-month CalWORKs (CW) time clock prior to reaching their WTW 24-MTC, they are not entitled to continue to receive WTW services as they will be removed from CW.
- D. All participants who are required to participate in the WTW program are subject to the WTW 24-MTC.
  - 1. This includes drug felons effective April 1, 2015.
  - 2. Aided adults that are not subject to the WTW 24-MTC include:
    - a. Non Cal-Learn 19 year old custodial parents who have not obtained a high school diploma or its equivalency
    - b. Non-Minor dependents.
- E. Unaided adults who are ineligible for the WTW program are not subject to the WTW 24-MTC. This includes adults who have:
  - 1. Exceeded the 48-month CW time limit.
  - 2. Drug Felons
    - a. Drug Felons will be required to participate in WTW and have time count towards their time limit effective April 1, 2015.
  - 3. Fleeing felons
  - 4. Ineligible non-citizens
  - 5. Non-needy caretaker relatives
  - 6. SSI recipients
  - 7. Permanently disqualified due to an IPV
- F. 16 or 17 year old non-parenting dependent teen is not subject to the WTW 24-MTC, regardless of his/her school attendance.
- G. Each parent in a two-parent household will have an individual WTW 24-MTC.
- H. The participant must meet California federal standards once the WTW 24-MTC has been exceeded in order to not be removed from aid.

### **II. Determining Months of Aid**

- A. A month in which a participant meets any one of the following conditions does not count towards the WTW 24-MTC:
  - 1. Any month prior to January 1, 2013
  - 2. A WTW exemption applies
  - 3. The ESW/SW determines that the participant has good cause for not participating in WTW for at least 50 percent of his/her hourly work participation requirement for the month.
  - 4. The participant is removed from the Assistance Unit (AU) due to a WTW sanction.
  - 5. The participant is participating in WTW appraisal, assessment, or otherwise in the process of developing a WTW plan.
    - a. When a participant completes a WTW plan and does not have a new/amended plan to sign, he/she is considered to be in the process of developing a WTW plan.

6. The participant is participating in job search when any of the following conditions are met:
    - a. The participant is participating in activities, including job search and job readiness, that meet California federal standards.
    - b. The participant is participating in job search as part of the development of his/her WTW plan.
    - c. The participant is participating in a WTW plan where job search is at least 50 percent of the participant's participation hours in the month. This is allowed for two (2) months in a twelve (12) month period and the participant must first exhaust his/her federally countable job search allowance.
      - 1) To determine if the adult(s) meet(s) this condition to stop the WTW 24-MTC, the ESW must determine the percentage of the AU's participation hours in job search using the following calculation:
        - i. Determine the AU's Hours
          1. Total combined scheduled hours in job search in the month and
          2. Total number of required participation hours for the month based on their average per week hourly requirement
        - ii. Divide the AU's total number of scheduled participation hours in job search in the month by the AU's total number of required participation hours in the month.
        - iii. Calculate percentage – multiply that number by 100 to get a percentage
        - iv. Round to the nearest whole number.
      - 2) If the calculated percentage of job search hours is at least 50 percent of the AU's total required participation hours, then the condition to stop the WTW 24-MTC is met.
      - 3) For two-parent AUs sharing a 35-hour requirement, when combined job search hours of parents sharing hours equals 50 percent or more of the AU's total requirement, both parents' WTW 24-MTC stop.
        - i. A parent in a two-parent AU who has no job search hours will not qualify for this condition to stop the WTW 24-MTC when the 50 percent threshold is met for the AU solely by the other parent.
  7. The participant is meeting California federal standards.
    - a. In a two-parent household, if one parent is participating and meeting the California federal standards, both parents will receive this 24-Month exemption.
    - b. When a participant who was meeting these standards is no longer meeting these standards, the ESW would begin counting months toward the clock prospectively.
      - 1) ESW shall begin counting months toward the WTW 24-MTC the first of the month following the date the ESW received information that the participant was not meeting California federal standards.
  8. The participant was in the reengagement process.
    - a. Reengagement from the temporary exemption of caring for a young child 12-23 months of age or two children under six years of age.
  9. The participant is eligible for the Cal-Learn program.
  10. The participant has been granted a domestic abuse waiver to the WTW 24-MTC.
  11. Excused parent in a two-parent family, regardless if that parent chooses to volunteer.
- B. ESW will use scheduled hours for purposes of calculating the WTW 24-MTC.
- C. If the ESW receives information that a month that was previously counted towards the WTW 24-MTC met the criteria for not counting, the ESW should retroactively untick that month.

- D. MEDS (WDTIP) shall be checked to assist in determining months of aid used in Napa County and other counties.

### **III. California Federal Standards**

- A. In order to be considered meeting the California federal standards the participants must meet the following criteria:
  - 1. The participant's activity or activities meet one of the activities listed below. Definition of these activities is listed in Attachment #2. This includes the flexibility the federal government allows for counting barrier removal activities toward employment or job search/job readiness.
    - a. Unsubsidized Employment
    - b. Subsidized Public and Private Sector Employment
    - c. Work Experience
    - d. On-the-Job Training
    - e. Job Search and Job Readiness
    - f. Community Service
    - g. Vocational Education
    - h. Job Skills Training Directly Related to Employment
    - i. Education Directly Related to Employment
    - j. Satisfactory School Attendance
    - k. Providing child care services to an individual who is participating in community service
  - 2. The participant has not exceeded the limitations on the amount of time that vocational education and job search/job readiness can be counted toward meeting the federal work participation rate (WPR).
  - 3. The client is meeting the federal core and non-core activity requirements. See Attachment #1
  - 4. The number of hours the participant is scheduled to participate in each week meets the minimum average weekly number of core and non-core hours in an activity or activities that meet the California federal standards
    - a. ESW would calculate the total average number of weekly participation hours in federal activities for each participant by dividing the total number of core and non-core hours in the month by 4.33.
- B. ESW will use scheduled hours for purposes of determining if a participant is meeting the California federal standards.
- C. Deemed hours can be used to determine if meeting the California federal standards.
  - 1. Single Teen heads of household, married teens, 19 years old or younger who maintain satisfactory attendance at secondary school or equivalent, or participate in education directly related to employment for an average of at least 20 hours, are considered meeting California standards.
  - 2. Participant's participating in community service at full Fair Labor Standards Act (FLSA) hours are deemed to be meeting the California federal standards.

### **IV. Initiate the WTW 24-MTC**

- A. The ESW/SW will develop a post-assessment WTW plan or a Family Stabilization Program (FSP) Plan.
- B. The ESW/SW must have and document a comprehensive discussion with the participant. The ESW will have the participant review and complete the SSSD 3056 – WTW 24 MTC Comprehensive Discussion Guide. This discussion must include at minimum:

1. The participation flexibility during the WTW 24-MTC period, including the scope of activities that they may participate in;
  2. The number of hours the participant is required to participate in;
  3. The criteria for WTW exemptions;
  4. The conditions that allow a month not to count toward the WTW 24-MTC; **and**
  5. The post WTW 24-Month time clock participation requirements.
- C. Once the WTW or FSP plan is developed and the comprehensive discussion has occurred, the WTW 24-MTC will begin the first of the following month.
- D. Participants with a break in aid longer than 30 days, upon returning shall have a new WTW plan developed.
1. The WTW 24-MTC will begin the first of the month following the month in which the new WTW plan was developed.
- E. Participants with a break in aid of less than 30 days, who had an active WTW plan developed when went off of aid shall continue in his/her plan if the WTW plan is still appropriate.
1. The WTW 24-MTC will begin or resume the first of the month following the date the participant's aid resumed.

#### **V. Time Limit Informing**

- A. Participants must receive the CW 2208 – Your WTW 24-Month Time Clock Informing Notice at the following times regarding the status of their WTW 24-MTC:
1. At application for CW aid
  2. At annual redetermination
- B. ESW will review all WTW cases in the month prior to the annual redetermination month to ensure the WTW 24-MTC is correct
- C. Participants must receive the WTW 43 – Notice of your WTW 24-Month Time Clock Ending Soon at least once between month 18 and 21.
1. The following forms must be sent along with the WTW 43:
    - a. CW 2186A – CalWORKs Exemption Request
    - b. WTW 44 – WTW 24-Month Time Clock Extension Request
- D. When the participant is participating in California Federal Standard activities that do not count towards the WTW 24-MTC, and is no longer meeting the criteria to not count the WTW 24-MTC, the ESW must send the WTW 38 – WTW 24-Month Time Clock Notice, within thirty (30) days of receiving verification or making the determination the clock will start counting again.
1. The issuance of this notice does not control whether time counts or not.
- E. Participants must be informed in the last month of the WTW 24-MTC that his/her clock will expire. The NA 1276 – End of WTW 24-Month Time Clock Notice of Action must be sent to the client prior to ten day notice.
1. C-IV will batch send this notice of action to all participant's in his/her 24 month of the WTW 24-MTC.
  2. ESW must verify that this notice was sent automatically.

#### **VI. Time Limit Extensions**

- A. 20 percent of cases are eligible to receive a WTW 24-MTC extension if they meet the extension criteria.

1. Upon making a determination that a participant meets the extension criteria, the ESW will contact the WTW Staff Services Analyst, who will be tracking the 20 percent target, if any extensions are available.
  2. The California Department of Social Services (CDSS) sends a letter every six months with the 20 percent target.
- B. An ESW shall grant an extension to a participant who presents evidence that he/she meets any of the extension criteria, unless the ESW determines that the evidence presented does not support the existence of the specified circumstance.
1. ESW must document in detail the reason for approving or denying an extension.
- C. A participant may qualify for an extension if they meet any of the following criteria:
1. Employment – Participant is likely to obtain employment within six (6) months. This extension may apply when the following situation(s) occur:
    - a. Participant is waiting for a license or certificate to be approved and issued.
    - b. Participant’s employer requires a period of time as a volunteer prior to employment.
    - c. Participant is waiting for a background check to be completed on an offered job.
    - d. Participant must complete an English as a Second Language or language class as part of the hiring process in order to start employment.
    - e. Participant has a job offer at the completion of a training / schooling.
    - f. Participant has been offered a job through an employer that has not yet opened.
  2. Labor Market – Participant has encountered unique labor market barriers temporarily preventing employment, and therefore needs additional time to obtain employment. This extension may apply when the following situation(s) occur:
    - a. Participant’s temporary disability (not qualifying for an exemption) is preventing the participant from returning to their normal type of employment.
    - b. An employer, with a specific job trade, closes business or relocates and that job trade is not available through another employer in the vicinity.
    - c. A local natural disaster has caused a disruption to the labor force. Examples, Drought, Freeze, or Earthquake. The participant may be unable to participate in their labor market employment during these times of disaster.
  3. Education – Participant has achieved satisfactory progress in an educational program, including adult basic education, vocational education, or a self-initiated program that has a known graduation, transfer, or completion date that would meaningfully increase the likelihood of his/her employment.
    - a. A high school education or its equivalent is presumed to meaningfully increase the likelihood of employment.
  4. Treatment – Participant has achieved satisfactory progress in a treatment program that has a known completion date that would meaningfully increase the likelihood of his/her employment.
  5. Disability – Participant needs an additional period of time to complete a WTW activity specified in his/her WTW case plan due to a diagnosed learning or other disability, so as to meaningfully increase his/her likelihood of employment.
  6. SSI Application – Participant has submitted an application to receive SSI disability benefits, and a hearing date has been established.
    - a. If a participant is applying for this extension and provides evidence that a hearing date has been established, the ESW must approve the extension request.

7. Participant obtained their high school diploma or its equivalent as an activity during the WTW 24-MTC and an additional period of time to complete an educational program or other WTW activity which the participant is currently participating in would meaningfully increase the likelihood of their employment.
  8. Two Parent – Participant is a member of a two-parent assistance unit where the other parent has yet to exhaust his/her WTW 24-MTC on the condition that both parent’s combined participation will meet CW minimum standards.
    - a. This extension is limited to the duration of the second parent’s WTW 24-MTC.
- D. An extension shall be granted for an initial period of up to six months. The extension shall be reevaluated by the ESW at least once every six months.
1. An extension can never be granted for a period of time longer than the number of months remaining on the participant’s 48-Month CW time clock, including any CW 48-Month time clock extender months.
  2. Prior to the participant reaching the last month of an extension period, the ESW must review the participant’s circumstances and reevaluate whether the participant’s circumstances continues to meet one of the extension criteria.
    - a. A C-IV task shall be set at month 5 to review for continued extension.
    - b. A new WTW 45 – WTW 24-Month Extender Determination form must be sent to approve or deny continued extension.
  3. If an extension is approved for longer than the initial six (6) months, the ESW shall document in the C-IV Journal the reason for another extension and any supporting documentation that was collected to approve a longer extension.
- E. The participant who receives an extension is required to participate for the number of hours required for the activities that he/she needs to be consistent with his/her assessment.
1. If the participant fails to participate as required, the ESW shall begin the remove from aid process. (See Section VII).
- F. If an ESW identifies that a participant meets one of the extension criteria as a result of information already available to the ESW, including the participant’s WTW plan and verification of satisfactory participation, the ESW may approve an extension without requiring additional information or a formal request from the participant.
- G. A participant may request an extension from the WTW 24-MTC. When a request is made, the ESW shall provide the participant with the WTW 44 – WTW 24-Month Time Clock Extension Request.
1. The ESW may request additional information or evidence of the specified circumstance to be provided by the participant.
- H. The ESW shall make a determination if the participant qualifies for an extension and send the WTW 45 – WTW 24-Month Time Clock Extension Determination form to the participant that includes an explanation of the ESW extension determination.
- I. When a participant, who is currently on a WTW 24-MTC extension, transfers into Napa County from another County, the ESW shall review the participant’s case information and the extension approval determination made by the previous County in order to determine whether the extension circumstance still exists and the related evidence presented is still valid and is consistent with Napa County’s written procedure.
1. ESW cannot ask for verification of the extension criteria until the ESW has reviewed information documents from the prior County and determination that information and documentation is insufficient.

2. If the circumstance still exists and is consistent with Napa County's policies, the ESW would not need to go through the extension request and determination process again and the participant may continue with the remaining extension period.
3. If the circumstance no longer exists and/or the ESW determines that the extension criteria do not apply based on Napa County's policies, the ESW would proceed with transitioning the participant to meet CW Federal Standards or review for another applicable extension.

**VII. Transitioning Participants to Post WTW 24-MTC – Remove from Aid Process**

- A. The participant must meet California federal standards once the WTW 24-MTC clock has been exceeded in order to not be removed from aid.
- B. When one parent in a two-parent household has exhausted the WTW 24-MTC, the parent that reached the time limit must modify his/her participation to meet the California federal standards to avoid being removed from aid, unless the other parent changes his/her participation. (Refer to Attachment #3)
  1. If the family does not meet California federal standards, the other parent or both parents combined would then need to participate a total of 35 hours per week in CW activities.
- C. When both parents in a two-parent household have exhausted the 24-Month time clock, the parents must meet the California federal standards for two-parent families to not be removed from aid.
- D. The ESW will schedule an End of WTW 24-MTC Review appointment with the participant in month 23 of the WTW 24-MTC. C-IV will automatically send the WTW 46 – End of the WTW 24-Month Time Clock Review Appointment Letter if an appointment is in C-IV. The ESW will send the WTW 46 – End of WTW 24-Month Time Clock Review Appointment Letter manually along with the WTW 44 – WTW 24-Month Time Clock Extension Request Form if the appointment was not previously scheduled. This appointment must consist of:
  1. A review of the participant's WTW 24-MTC for accuracy. This will require the participant and ESW to assess any months that should be retroactively restored or "un-ticked" on the clock, as well as assess the participant's expected participation in the remaining month(s) to determine when his/her WTW 24-MTC will be exhausted.
  2. A discussion of criteria and determination, to the extent possible, of whether the participant qualifies for an exemption from WTW participation.
  3. A discussion of criteria and determination, to the extent possible, of whether the participant qualifies for an extension to the WTW 24-MTC, as well as providing the WTW 44 - WTW 24-Month Time Clock Extension Request Form.
    - a. Complete the WTW 45 – WTW 24-MTC Extension Determination Form if the WTW 44 is completed.
  4. Informing the participant about any changes needed in his/her WTW plan to align with California federal standards and when the changes would take effect. The signed WTW 2 will serve as the written notice of any changes and may be effective when the client exhausts his/her WTW 24-MTC.
    - a. Any changes needed for this review is not considered developing a WTW plan for the purposes of stopping the WTW 24-MTC.
  5. Document in the C-IV Journal all information provided and actions taken.
- E. Participants who have exhausted his/her WTW 24-MTC and any extensions, and who are not meeting California federal standards, must have his/her needs removed from the family grant. This is referred to as the "Remove from Aid" process.



1. The remove from aid process is identical to the sanction process, however cannot be called "sanction."
- F. In order to remove the aid from the participant, the ESW shall:
1. Send an NA 840 (first parent) or NA 845 (second parent) providing 20 days from the issuance of the NOA for the participant to discuss the participation problem and agree to a compliance plan to correct the participation problem in month 24 of the participant's 24-Month time clock.
    - a. The WTW 27 – Request for Good Cause Determination must be sent with the NA 840 and with the NA 845.
    - b. The WTW 44 - WTW 24-Month Time Clock Extension Request must be sent with the NA 840 and with the NA 845.
    - c. The WTW 4 – Notice to Other Parent must be sent at the same time as the NA 840 when the case is a two-parent household.
  2. A good cause determination must be made if the participant requests good cause in writing or verbally. Determination must be provided to the participant on an NA 840A – Notice of Action – Determination of Good Cause / No Good Cause
  3. Complete a WTW 32 – WTW Compliance Plan with the participant, if he/she agrees to comply during the compliance appointment.
  4. Send the NA 817 – Sanction or Removal of Participant from Aid after Failed Compliance or the NA 816 – Sanction or Removal of Other Parent from Aid After Failed Compliance Plan if the participant fails to complete the compliance plan.
    - a. A WTW 31 – Request to Meet WTW Rules and Get My Cash Aid Back for must be attached to the NA 817/NA 816.
  5. Document all actions taken and timeframes in the C-IV Journal.
  6. Inform the EW that aid must be stopped for the participant and provide the date action should be taken.
- G. In order to have aid restored the current sanction curing process shall be used. Refer to WTW Non-Compliance Procedure.
1. The WTW 29 – Plan to Meet WTW Rules and Get My Cash Aid Back must include a plan that meets California federal standards.
  2. Signing the WTW 29 to have aid restored will allow the participant access to supportive services while he/she participates in accordance with the plan.

## **VIII. Time Clock Review**

- A. The ESW shall review the accuracy of the WTW 24-MTC at all of the following times:
1. In the month prior to the month of annual renewal.
  2. Prior to sending the WTW 43 = Notice of your WTW 24-Month Time Clock Ending Soon.
  3. Prior to sending the WTW 46 – End of WTW 24-Month Time Clock Review Appointment Letter.
  4. Prior to transferring the case to another county.
  5. Prior to transferring the case to another ESW.
  6. When closing a WTW case due to CW discontinuance.
- B. Complete a C-IV Journal Entry that review has been completed.
1. Journal Category = Employment
  2. Journal Type = Narrative
  3. Short Description = WTW 24-MTC Review
  4. Long Description shall include at minimum:

- a. Months ticked or unticked.
- b. C-IV updates made, if any.
- c. Total number of months used.

**IX. C-IV Entry**

1. ESW must manually review and update any 24-Month time limit exemptions or exceptions in order to stop the WTW 24-MTC. This is done on the Cash Aid Time Limit Detail Page.
2. Until C-IV is automated, WTW 24-MTC exemptions and exceptions must be updated each month in order for the month to not count.
3. ESW shall pull the Time Limit Report from Reports/Case Activity in C-IV at the beginning of each month to identify the cases that need to have informing done.
4. To enter the Removal of Aid the EW will:
  - a. Update the Eligibility Non-Compliance Detail Page with the following information
    - 1) Program = Cash
    - 2) Type = WTW
    - 3) Reason = Post WTW 24 MTC CW Fed Requirements Not Met
    - 4) Begin Date = Effective Date
  - b. Run EDBC and confirm the EDBC removed the appropriate client from aid and the AU unit. Accept and save EDBC
  - c. Create a Journal Entry
  - d. Add a Case Flag to the case. Select “WTW 24-MTC”

**REFERENCES:**

- ACIN [I-47-15](#) – Emergency Regulations Implementing SB 1041
- ACL [12-53](#) – 24-Month Time Clock Informing Notice Language (CW 2205)
- ACL [12-53E](#) – Errata to 24-Month Time Clock Informing Notice Language (CW 2205)
- ACL [12-67](#) – New CW WTW 24-Month Time Clock
- ACL [13-12](#) – 24-Month Time Clock Informing Notice (CW 2208)
- ACL [13-15](#) – Questions and Answers #1
- ACL [13-37](#) – Questions and Answers #2
- ACL [13-59](#) – Questions and Answers #3
- ACL [13-68](#) – Questions and Answers #4
- ACL [14-09](#) – Extensions to the WTW 24-Month Time Clock
- ACL [14-16](#) – Questions and Answers #5
- ACL [14-48](#) – Release of WDTIP Codes associated with WTW 24-Month Extensions
- ACL [14-65](#) – New WTW 24-Month Time Clock Informing Notice (WTW 43)
- ACL [15-01](#) – Additional Guidance and WDTIP Codes for 24-Month Extensions
- ACL [15-03](#) – Participation Requirements for Participants who have Exhausted 24-Month Time Clock.
- ACL [15-09](#) – WTW Flow Changes
- ACL [15-21](#) – Questions and Answers #6
- ACL [15-62](#) – Post WTW 24-Month Time Clock Remove from Aid Process
- ACL [16-13](#) – Same-Sex Marriage and Registered Domestic Partnerships
- ACL [16-99](#) – WTW Participation Requirements for Teens
- ACL [17-78](#) – Questions and Answers #7
- ACL [18-41](#) – New and Expanded WTW 24 MTC Education Extension Reasons

C-IV CIT 0072-15 – SCR 1137: Post WTW 24-Month Time Clock Remove From Aid Process  
 EAS [42-708](#) – WTW 24-Month Time Clock  
 EAS [42-709](#) – CalWORKs Federal Standards  
 Napa County Bulletin #[13-04](#) – New WTW 24-Month Time Clock Informing Notice – CW 2208  
 Napa County Bulletin #[14-15](#) – WTW 24-Month Time Clock Informing – WTW 43  
 WTW Program Non-Compliance Procedure

**FORMS**

CW 2186A – CalWORKs Exemption Request  
 CW 2208 – Your WTW 24-Month Time Clock  
 NA 840 – Notice of Action – WTW Plan  
 NA 845 – Sanction and Removal of the Other Parent’s Needs  
 WTW 4 – Notice to Other Parent  
 WTW 27 – Request for Good Cause Determination  
 WTW 29 – Plan to Meet WTW Rules and Get My Cash Aid Back  
 WTW 38 – WTW 24-Month Time Clock Notice  
 WTW 43 – Notice of your WTW 24-Month Time Clock Ending Soon  
 WTW 44 – WTW 24-Month Time Clock Extension Request  
 WTW 45 – WTW 24-Month Time Clock Extension Determination  
 WTW 46 – End of WTW 24-Month Time Clock Review Appointment Letter

**CONTACT PERSON(S):**

Shanna Gardner, Staff Services Analyst

**END OF PROCEDURE**

**REVISION HISTORY:**

Revision	Date	Description of Change	Requested By
0.0	01-12-16	Procedure Created. Released in Working Draft	S. Gardner, SSA
0.1	04-28-16	Finalized procedure. Included new information from C-IV as well as documentation requirements.	S. Gardner, SSA
1.0	03-29-19	Biennial Review. Included ACL 17-78 and ACL 18-41	S. Gardner, SSA

## CalWORKs WTW Participation Requirements

CalWORKs Activities for 24-Month Time Clock	CalWORKs (Federal) Activities Outside 24-Month Time Clock
<i>No Core Activity Requirement</i> <sup>3</sup>	Core Activities
Unsubsidized employment	Unsubsidized employment <ul style="list-style-type: none"> <li>• Self-employment</li> </ul>
Subsidized private or public sector employment	Subsidized private or public sector employment <ul style="list-style-type: none"> <li>Grant-based OJT</li> <li>Work study</li> </ul>
Work experience	Work experience
Community service	Community service
Vocational education	Vocational education (12-month lifetime limit)
On-the-job training (OJT) Grant-based OJT <sup>4</sup>	OJT <ul style="list-style-type: none"> <li>• Job search and job readiness<sup>6</sup></li> <li>• Mental health services</li> <li>• Substance abuse services</li> </ul>
Job search	Providing child care to a community service program participant
Job readiness Self-employment <sup>4</sup> Supported work and transitional employment <sup>4</sup> Work study <sup>4</sup>	• •
Mental health, substance abuse, domestic violence services	Non-Core Activities
Job skills training directly related to employment	Job skills training directly related to employment
Education directly related to employment	Education directly related to employment (for individuals with no high school diploma or equivalent)
Satisfactory attendance in a secondary school or in a course leading to certificate of general equivalence (GED)	Satisfactory attendance in a secondary school or in a GED course
Adult basic education (reading, writing, arithmetic, high school proficiency or GED, and English-as-a-Second-Language)	
Participation required by school to ensure child's attendance	
Other activities necessary to assist in obtaining employment <ul style="list-style-type: none"> <li>• Non-credited study time<sup>5</sup></li> </ul>	

<sup>1</sup>Unless one parent is exempt because of a disability, in which case the remaining parent is required to participate 30 hours per week.

<sup>2</sup>Any month in which the adult meets federal participation requirements does not count toward the WTW 24-Month Time Clock. Adults who have received 24 countable months of CalWORKs WTW activities and have not reached the 48-month time limit for cash aid must meet state standards that mirror federal work participation requirements to remain on or restore aid.

<sup>3</sup>There is no core hourly requirement during the WTW 24-Month Time Clock.

<sup>4</sup>These activities are not identified in federal law, but are forms of subsidized or unsubsidized employment.

<sup>5</sup>At county option, non-credited study time is a countable activity in conjunction with any approved education activity.

<sup>6</sup>Job search and job readiness is federally countable for four consecutive and six total weeks in a 12-month period. This limitation can be extended to 12 weeks if California is determined to be a needy state in accordance with Temporary Assistance for Needy Families (TANF) regulations.

## Welfare-To-Work Activities That Meet California Federal Standards

### **Unsubsidized Employment**

“[U]nsubsidized employment is full- or part-time employment in the public or private sector that is not subsidized by TANF or any other public program. Unsubsidized employment includes self-employment as well as recipients whose employers claim a tax credit for hiring economically disadvantaged workers. Apprenticeship programs that allow participants to earn money while they practice the trade under the supervision of a journey person and attend classes are also considered unsubsidized employment. Only the hours that are paid by the employer are counted as unsubsidized employment. The determination of whether employment is subsidized, or not, depends on whether the employer, rather than the recipient, receives a subsidy.”

Hours of participation in various barrier removal activities, such as mental health, substance abuse, and/or rehabilitative services, can count under this activity if they are integrated parts of unsubsidized employment. In order to count, the individuals must be paid for all of the hours they participate in such activities that are counted as unsubsidized employment. If the individuals are not paid while participating in these activities, the participation will be reported as a blend of unsubsidized employment and another appropriate activity such as job search and job readiness assistance.

**Subsidized private sector employment and subsidized public sector employment** “[S]ubsidized private sector employment and subsidized public sector employment means employment in the private and public sectors, respectively, for which the employer receives a subsidy from TANF or other public funds to offset some or all of the wages and costs of employing a work-eligible individual. Subsidized work may include (1) work supplementation where TANF funds that would otherwise be paid as assistance are paid to the employer or to a third-party contractor, like a temporary staffing agency, which serves as the employer of record and is paid a fee to cover salary, expenses and success in placing employees; (2) supported work for individuals with disabilities in an integrated setting, (3) work study activities or (4) paid barrier removal and educational activities. Subsidized employment is distinguished from work experience in that the participant in subsidized employment is paid wages and receives the same benefits as an employee with no subsidy who performs similar work.

Hours of participation in various barrier removal activities, such as mental health, substance abuse, and/or rehabilitative services, can count under this activity if they are integrated parts of subsidized employment. In order to count, the individuals must be paid for all of the hours they participate in such activities that are counted as subsidized employment. If the individuals are not paid while participating in these activities, the participation will be reported as a blend of subsidized employment and another appropriate activity such as job search and job readiness assistance.

### **Work experience**

“[W]ork experience is a training activity performed in the public or private sector, as well as a nonprofit, community- or faith-based setting, that helps provide basic job skills, enhances existing job skills in a position related to the participant’s experience, or provides a needed community service that shall lead to unsubsidized employment. The recipient is receiving compensation in the form of the cash aid grant for time spent in the activity.

Core hours shall be limited as follows:

- When the assistance unit includes food stamp recipients, the individual shall participate for no more than the number of hours each month, determined collectively for the assistance unit, equal to the CalWORKs grant plus the food stamp allotment divided by the State or federal minimum wage, whichever is higher; or
- When the assistance unit does not include food stamp recipients, the individual shall participate for not more than the number of hours each month, determined collectively for the assistance unit, equal to the CalWORKs grant divided by the State or federal minimum wage, whichever is higher.”

Hours of participation in various barrier removal activities, such as mental health, substance abuse, and/or rehabilitative services, can count under this activity if they are integrated parts of work experience.

### **On-the-job training**

“[O]n-the-job training is training in the public or private sector that is given to a paid employee while he or she is engaged in productive work. On-the-job training provides knowledge and skills that are essential to the full and adequate performance of the job. The employer is subsidized to offset training costs.

Supported work may be counted as on-the-job training if it includes significant training in the skills and knowledge essential to job performance. On-the-job training may also include orientation and classroom instruction required by the recipient’s employer and/or case manager. In some instances, training (e.g., tax preparation) or continuing education (e.g., nursing) is a necessary and regular element of employment. On-the-job training may include participation in these types of activities when the individual is reimbursed for the training costs. When the individual is not reimbursed for training costs, the participation counts as job skills training directly related to employment, education directly related to employment, vocational educational training, or job search and job readiness assistance, as appropriate.”

### **Job search and job readiness assistance**

“[J]ob search is an activity in which the participant’s principal activity is to seek employment. Job search includes looking for suitable job openings, making contact with potential employers, applying for vacancies, and interviewing for jobs.

Job readiness assistance is an activity that provides a recipient with training to learn basic job seeking and interviewing skills, to understand employer expectations, and to learn skills designed to enhance an individual’s capacity to move toward self-sufficiency. Job readiness assistance also comprises the following activities:

- a. Preparing an individual to obtain or retain employment, such as preparing a resume or job application, interviewing skills, instruction in work place expectations, and life skills training.
- b. Substance abuse treatment, mental health treatment, or rehabilitation activities. Treatment or rehabilitation services can include residential treatment, group or individual therapy, support group, or participation in Alcoholics Anonymous, and Narcotics Anonymous. [Note: Substance abuse treatment, mental health treatment and rehabilitation programs that include integrated hours of unsubsidized employment, subsidized employment, work experience, or another activity may count as another activity during the hours of the integrated component, as long as the component meets a common sense definition of that other activity.]
- c. On a case-by-case basis, domestic abuse services that address barriers to employment. Treatment and services for domestic abuse victims include the following activities when needed to seek or prepare for employment: individual counseling of the participant and children; group counseling; substance abuse services; medical and public health services; mental health services; independent living skills; financial planning and life skills

training.

The criteria professionals use for assigning these services is that they must be necessary to prepare an individual to obtain or maintain employment or participate in welfare-to-work activities and must be verified and documented in the WTW plan and/or case file. If a portion of the treatment or rehabilitation activities meets a common-sense definition of another work activity, such as community service or work experience, then the hours associated with the "work" will count under that activity and the actual treatment hours will count in job search and job readiness assistance.

- d. Drug testing for a specific job classification and taking tests to qualify for specialized certificates. These activities will be assigned to the extent they are determined necessary for the participant to obtain or prepare for employment or participate in other welfare-to-work activities.

Participation in orientation, appraisal, or assessment. Orientation is an introduction to the welfare-to-work program, including a general description of CalWORKs activities, participation requirements, consequences for failing to meet requirements, available supportive services, and exemptions from participation. Appraisal is an evaluation of an individual's employment history and skills, necessary supportive services, and any other relevant information needed to assign an individual to welfare-to-work activities, as well as informing the individual of his or her rights and responsibilities as pertains to the program.

Assessment is a thorough individual review of the recipient's work history, employment skills, educational history, competency levels, need for supportive services, physical limitations or mental conditions, available resources, all in comparison to local labor market conditions, in order to complete a welfare-to-work plan.

- e. Time spent online in distance learning activities. Online tasks could include searching for job vacancies, submitting résumés and completing applications.

Hours spent in these activities will be verified and documented in the WTW plan. Job interviews may be obtained from participating in this activity. Reasonable transportation time between job interviews, but not to the first interview or from the last one of the day, will count toward job search and job readiness hours. A county may require additional verification of activities, which may include such documents as job contact logs that provide sufficient information to verify the job search activity, mileage logs, or other documentation included in the case file."

### **Community service programs**

"[C]ommunity service is training that is temporary and transitional, is performed in the public or private nonprofit sector, and provides basic job skills that may lead to employment while meeting a community need. Other activities may be included within the community service programs. In these situations, short-term training or equivalent activities will be included if they are of limited duration (usually no longer than six months) and are necessary for participation in the community service activity."

### **Vocational educational training**

"[V]ocational educational training is organized educational programs that are directly related to the preparation of individuals for employment in current or emerging occupations. Vocational education must be provided by vocational-technical schools, postsecondary institutions or proprietary schools. Vocational educational training placements are documented on a list developed by each California county. The list, which is revised annually, includes programs that lead to jobs in the local labor market and is used by the county welfare department to

approve vocational educational training and/or to assign activities as a result of assessment. For programs not on the county's list, the county welfare department determines if the program is directly related to job preparation.

In some instances, the vocational educational training will be completed as part of distance learning. Participation will count toward vocational educational training hours only when the time spent can be monitored by the service provider and reported to the county welfare department. Participation in vocational educational training beyond the 12-month limit may count as job skills training directly related to employment or education directly related to employment, whichever definition is applicable, only after the core hourly requirement has been met from participation in other core activities.

Basic and remedial education and English as a Second Language will be counted as part of vocational educational training activity on a case-by-case basis when the participant's educational history and present educational competency level assessment shows a need for such activities to be included in the vocational education program for the participant to be successful.

Actual hours spent in supervised homework time and up to one hour of unsupervised homework time for each hour of class time will be counted. A statement from the educational program indicating the amount of homework required must be included in the case file. Total homework time counted for participation will not exceed the hours required or advised by the educational program."

### **Job skills training directly related to employment**

"[J]ob skills training directly related to employment is training or education for job skills required by an employer to provide an individual with the ability to obtain employment or to advance or adapt to the changing demands of the workplace. The activity may include either customized or general training to prepare an individual for employment, including literacy and language instruction and other remedial education. Job skills training directly related to employment may include four-year bachelor degree programs at any State-certified college or university. Activities may include vocational educational training that has been extended beyond 12 months.

In some instances, the job skills training will be completed as part of distance learning. Participation will count toward job skills training directly related to employment only when the distance learning program otherwise meets the definition of job skills training directly related to employment and the time spent in the distance learning component can be monitored by the service provider and reported to the county welfare department and documented in the case file.

Actual hours spent in supervised homework time and up to one hour of unsupervised homework time for each hour of class time will be counted. A statement from the educational program indicating the amount of homework required must be included in the case file. Total homework time counted for participation will not exceed the hours required or advised by the educational program."

**Education directly related to employment, in the case of a recipient who has not received a high school diploma or a certificate of high school equivalency** "[E]ducation directly related to employment is education related to a specific occupation, job, or job offer. The activity is primarily for adults and includes adult basic education and ESL and, where required as a prerequisite for employment, education leading to a General Educational Development (GED) credential or high school equivalency diploma. Activities may include vocational educational training that exceeds the 12-month limit.

In some instances, the education directly related to employment will be completed as part of distance learning. Participation will count toward education directly related to employment only when the distance learning program



otherwise meets the definition of the activity and the time spent in distance learning can be monitored by the service provider and is reported to the county welfare department.

Actual hours spent in supervised homework time and up to one hour of unsupervised homework time for each hour of class time will be counted. A statement from the educational program indicating the amount of homework required must be included in the case file. Total homework time counted for participation will not exceed the hours required or advised by the educational program.”

**Satisfactory school attendance at secondary school or in a course of study leading to a certificate of general equivalence in the case of a recipient who has not completed secondary school or received such a certificate**

“[S]atisfactory school attendance is regular attendance, in accordance with the requirements of the secondary school or course of study, at a secondary school or in a course of study leading to a certificate of general equivalence, in the case of a work-eligible individual who has not completed secondary school or received such a certificate. Satisfactory school attendance is primarily an activity for minor parents and will only include other related educational activities, such as adult basic education or language instruction, when they are required for completion of a General Educational Development (GED) credential. Hours of participation attending high school in a vocational education track may be counted under this activity.

In addition, case management services are provided to minor parents in this activity. Case management involves directing and coordinating a recipient’s educational, health, and social services and may include ESL, career training, alternative school, tutoring, dropout prevention, and teen pregnancy or parenting programs. The case management programs are essential to this work category in that they address the special social service needs of minor parents. Meeting these specific needs helps this group of recipients attain GED credential or attend secondary school, which helps minor parents achieve self-sufficiency.

In some instances, participation will be completed as part of distance learning and will count toward satisfactory school attendance only when the distance learning program otherwise meets the definition of the activity and the time spent can be monitored by the service provider and is reported to the county welfare department on a monthly basis. Actual hours spent in supervised homework time and up to one hour of unsupervised homework time for each hour of class time will be counted. A statement from the educational program indicating the amount of homework required must be included in the case file. Total homework time counted for participation will not exceed the hours required or advised by the educational program.”

**Providing child care services to an individual who is participating in a community service program**

“[P]roviding child care services is providing child care to enable another TANF recipient to participate in a community service program. The activity does not allow for one parent in a two-parent case to care for their own children in the home.”

**Two-Parent AU Post WTW 24-Month Time Clock Participation Options  
(For Both Parents to Remain on Aid)**

Participation Option		Clock Status
<i>One Adult (Parent 1) Exhausted the WTW 24-Month Time Clock (Assumes neither adult is exempt)</i>		
1)	➤ Parent 1 alone meets CW federal standards	<ul style="list-style-type: none"> <li>• Parent 2 remains excused, but may volunteer to participate</li> </ul>
2)	➤ Parents 1 and 2 combine hours to meet California federal standards.	<ul style="list-style-type: none"> <li>• Parent 2's WTW 24-Month Time Clock does not tick</li> </ul>
3)	➤ Parents 1 and 2 combine hours to meet CalWORKs minimum standards to use Parent 2's WTW 24-Month Time Clock. <ul style="list-style-type: none"> <li>▪ (Parent 1 receives extension)</li> </ul>	<ul style="list-style-type: none"> <li>• Parent 1 receives an extension while Parent 2 has time remaining on the WTW 24-Month Time Clock.</li> <li>• Parent 2's WTW 24-Month Time Clock ticks.</li> </ul>
4)	➤ Parent 2 alone meets CalWORKs minimum standards to use the WTW 24-Month Time Clock. <ul style="list-style-type: none"> <li>▪ (Parent 1 is excused from participation)</li> </ul>	<ul style="list-style-type: none"> <li>• Parent 1 is excused from participation while Parent 2 alone meets requirements to use his or her WTW 24-Month Time Clock.</li> <li>• Parent 1 may volunteer to participate additional hours beyond the family's minimum hourly requirement.</li> <li>• Parent 2's WTW 24-Month Time Clock ticks.</li> </ul>
5)	➤ Parent 2 alone meets California federal standards.	<ul style="list-style-type: none"> <li>• Parent 2's WTW 24-Month Time Clock does not tick.</li> <li>• Parent 1 is excused and may volunteer to participate additional hours beyond the family's minimum hourly requirement.</li> </ul>
<i>Participation Options When Both Adults Exhaust the WTW 24-Month Time Clock (Assumes neither adult is exempt)</i>		
1	<ul style="list-style-type: none"> <li>• Parent 1 alone meets CalWORKs federal standards.</li> </ul>	
2	<ul style="list-style-type: none"> <li>• Parent 2 alone meets CalWORKs federal standards.</li> </ul>	
3	<ul style="list-style-type: none"> <li>• Parents 1 and 2 combine hours to meet CalWORKs federal standards.</li> </ul>	