

WTW Reengagement

Number: 230

Approved: Signature on file

Date 8/2013

PURPOSE

This policy provides instructions on the process for reengagement of individuals who are currently exempt from WTW participation due to the temporary young child exemptions originally implemented in August 2009. Under this exemption, parents or caretaker relatives caring for a child 12 through 23 months of age, or two or more children under six years of age were exempt from Welfare-to-Work (WTW) participation.

These temporary WTW exemptions ended on December 31, 2012.

POLICY

Individuals who were exempt as of December 31, 2012 are not required to participate in WTW activities, and will not have months count against their CW 48-month Time on Aid (TOA) clock, until they are reengaged.

All previously exempt individuals are required to participate in WTW activities unless they meet criteria for a different WTW exemption. Refer to Policy 100 F1 WTW Exemptions.

Reengagement is defined as the development of a WTW plan and the provision of necessary supportive services. For information regarding the WTW plan, refer to Policy 211 WTW Plan.

The order of clients contacted to begin the reengagement process follows an established sequence. In Orange County the reengagement sequence will begin with clients whose RRR is scheduled for September 2013 and will continue each month until all clients are reengaged at the time of their scheduled RRR.

Reengagement should be structured to minimize the disruption of any employment or training activity in which an individual is already participating.

WTW Reengagement Processing Guidelines were developed to provide specific at-a-glance information for line staff and management regarding the reengagement process. Refer to Attachment I of this policy.

REENGAGEMENT

Multiple notices, which follow a prescribed timeline, must be provided to individuals during the reengagement process. Failure to follow the

NOTICING REQUIREMENTS

prescribed timeline will necessitate that the notification/reengagement process start over. Ongoing communication between staff is critical. Individual responsibilities are outlined below.

OSW:

First Notice:

Beginning July 1, 2013, and monthly thereafter, the OSW will review their Temporary Exemption Report (TER) for their caseload for clients with RRRs due in the second future month. The TER is located on the P Drive P:\Family Self Sufficiency\Reengagement Temporary Young Child Exemptions

Example: In July 2013 OSWs will review their TER to identify recipients whose RRR is due in September 2013.

To initiate the reengagement process, the OSW will mail each identified recipient a Reengagement Informing Notice (CW 2206) notifying him/her that his/her exemption has ended as of December 31, 2012.

The Reengagement Informing Notice:

- Must be mailed at least **60 days** before the client can be reengaged, **and 30 days** before the second notice is mailed,
- Informs individuals that they will be contacted by a Case Manager (CM) to discuss participation in WTW activities,
- Must include the Notice of Language Services GEN 1365.

The OSW will initiate a WTW referral per current business processes unless the individual is currently participating as an exempt volunteer and already has an assigned CM.

The OSW will file a copy of the Reengagement Informing Notice (CW 2206) in OnBase in the recipient's CaWORKs case in the Admin Acco.

The OSW will forward a copy of the Reengagement Informing Notice (CW 2206) to the current or new CM and the CM will file a copy of the CW 2206 in OnBase in the Employment Services case in the WTW 24 Month Clock Acco.

Note: If it has been more than six months since an individual received the first Reengagement Informing Notice, the OSW is required to reissue the Reengagement Informing Notice at least 60 days prior to beginning the individual's reengagement process.

CM:

Second Notice:

After the client receives the Reengagement Informing Notice (CW 2206), the CM must mail a second customized CW 2206 to the individual to schedule the Reengagement Evaluation.

Based on the family's circumstances, the CM will select **one** of the following customized notices, CW 2206-1, 2, 3 or 4 to notify client of the Reengagement Evaluation process.

- CW 2206-1: Individual not participating, including if other parent in two-parent household is not participating.
- CW 2206-2: Individual partially participating, including if other parent in two-parent household is not participating or two parents sharing hours, but not fully meeting requirements
- CW 2206-3: Individual fully participating, including fully participating while other parent in two-parent household is not participating and two-parent households that are fully meeting requirements by sharing hours.
- CW 2206-4: Two-parent household, one parent already participating.

The CM will file a copy of the customized Reengagement Evaluation Notice (CW 2206-1, 2, 3 or 4) in OnBase in the recipient's Employment Services case in the WTW 24 Month Clock Acco.

The Reengagement Evaluation may be conducted in person, by mail or by phone depending on the individual's specific circumstances.

- If the Reengagement Evaluation is done face-to-face, the CW 2206-1 must be mailed at least **30 days** prior to the date of the scheduled appointment.
- If the Reengagement Evaluation is done by phone or mail, the customized Reengagement Evaluation Notice CW 2206-2, 3, or 4 must be sent **30 days** prior to the date documentation is required from the individual if he/she is currently participating in a WTW activity

The following must be mailed with the customized CW 2206-1, 2, 3, or 4:

- A copy of the original Reengagement Informing Notice (CW 2206), (Filed in OnBase in the Employment Services case in the WTW 24-Month-Clock acco by CM after received from OSW)

- and
- A CalWORKs Exemption Request form ([CW 2186A](#)).
- Notice of Language Services [GEN 1365](#)

CM:

Third contact

A subsequent contact must be initiated by the CM to ensure that the individual is able to attend his or her Reengagement Evaluation appointment or submit the necessary verification requested by the CM. This contact may be made verbally or in writing.

All contacts must be documented in CalWIN Case Comments.

**REENGAGEMENT
PROCESS**

Individuals are considered required to participate in WTW upon receiving a customized Reengagement Evaluation Notice (CW2206-1, 2, 3 or 4) The individual's time clocks will not begin until the first of the month after he/she signs a WTW plan and the necessary supportive services are in place.

The Reengagement process is completed when the CM conducts a Reengagement Evaluation and a WTW plan is signed. WTW activity assignment will be based on the individual's unique circumstances which may or may not follow the normal WTW flow. Refer to the CalWORKs/WTW Reengagement Program Flow, [Worker Tool 10](#).

Example: An individual who never attended a WTW Orientation or Appraisal may benefit from entering the WTW flow at the beginning, while an individual who was already assessed and who is partially participating may only need to increase his or her weekly hours of participation.

If an individual fails to attend an appointment or otherwise participate in the reengagement process, without good cause, he/she will be subject to non-compliance and possible sanction. When these individuals are in the non-compliance process, time is not counted against the WTW 24-Month Time Clock and CalWORKs 48-month time limit.

Note: Individuals currently participating in WTW as exempt volunteers should be allowed to continue in their current activity if they are meeting the new participation requirements. However, a new WTW plan must be signed to reflect the change in status from a volunteer to a mandatory participant.

REENGAGEMENT EVALUATION The Reengagement Evaluation includes the following:

- A case-by-case determination of an individual's status and needs,
- Determining whether the individual qualifies for another exemption or has good cause for not participating in WTW,

- Informing the individual of the number of months left on his/her CalWORKs 48-month time limit,
- Determining which stage in the WTW flow is appropriate to begin reengaging the individual,
- Identifying possible barriers to participation,
- Evaluating, if applicable, Self-Initiated Program (SIP) eligibility. An individual is eligible if:
 - He/she never attended a WTW appraisal prior to reengagement,
 - He/she participated in a SIP prior to becoming exempt if making satisfactory progress through the exemption period,
 - The SIP activity was interrupted for a reason that meets good cause criteria. Refer to Policy 240 Good Cause Sanction

- A Comprehensive Discussion with the individual which includes the following information:
 - The new WTW 24-Month Time Clock and an explanation that the new WTW 24-Month Clock will tick every month the participant does not meet federal work participation requirements,
 - Participation flexibility during the WTW 24-Month Time Clock period, including elimination of the core and non-core hourly requirements and the different WTW activities he/she may participate in,
 - Change in the number of hours he/she is required to participate in,
 - Individual's ability to change his/her participation in WTW according to the new rules (hours, or activities, or both),
 - WTW exemption criteria, including the new once-in-a-lifetime young child exemption and how to request a WTW exemption. Refer to CalWORKs Exemption Request Form CW 2186A,
 - Months that do not count toward the WTW 24-Month Time Clock,
 - Participation requirements after the 24-Month Time Clock is exhausted, including that in order to remain eligible for cash assistance, the participant will have to meet federal work participation requirements,
 - Description of supportive services available and advance payment options.

For more information regarding the Comprehensive Discussion and WTW 24-Month tracking, refer to Policy 207 WTW 24-Month Time Clock.

**TEMPORARY
WTW EXEMPT
INDIVIDUALS**

If an individual, who was not already a volunteer in December 2012, makes a request to volunteer in advance of his/her scheduled RRR, the OSW must either:

- Offer to fully reengage the individual, OR,
- Honor the new request to volunteer. The individual must be reengaged when he/she would have been normally selected for reengagement as part of the County's sequencing plan.

Individuals who choose to reengage prior to the County reengagement sequence, must be informed of the following:

- The WTW temporary exemption will end if the individual chooses to reengage in advance,
- Other exemptions the individual may qualify for,
- Information regarding the WTW 24-Month Time Clock and the CalWORKs 48-month time limit,
- The number of participation hours required,
- The consequences for not meeting participation requirements including the non-compliance process and possible sanction,
- When the individual would otherwise be required to be reengaged under the County's normal reengagement sequencing.

If an individual chooses to reengage prior to the County's reengagement sequencing, the individual must be informed of the reengagement process. The individual must be provided a Reengagement Informing Notice (CW2206) if he/she has not been informed or if it has been more than six months since he/she received the notice.

Individuals may request to waive the 60-day (CW 2206) and 30-day (2206-1, 2, 3, or 4) noticing requirements. The CM must clearly document the request in CalWIN case comments and note the date the 2206 and 2206-1, 2, 3, or 4 were provided to the participant.

**TWO-PARENT
ASSISTANCE
UNIT**

The reengagement process for the two-parent household will depend on the status of the first parent.

Two-parent household – One Parent Temporary Exempt

- If one parent meets the two-parent household's participation requirement, the second parent is excused from further participation.
- The second parent will receive the Reengagement Evaluation Notice (CW 2206-4) asking if he/she would like to voluntarily participate.
- Time begins to count against his/her CalWORKs 48-month time limit 30 days after the CW 2206 was sent if there is no response.
- If both parents in the two-parent household wish to share hours to meet the participation requirements:
 - Both parents are required to attend the Reengagement Evaluation appointment.
 - The second parent is considered reengaged **and** time begins to count against his/her CalWORKs 48-month time limit the first of the month after he/she signs the WTW plan and supportive services are in place.
- If the second parent does not respond to the County's request to provide additional information or attend an appointment, the County will:
 - Automatically document the individual as "having good cause as an excused second parent" without initiating the non-compliance process as long as the first parent continues in a WTW plan that meets the 35-hour weekly requirement,
 - The second parent is considered reengaged **and** time begins to count against his/her CalWORKs 48-month time limit **30 days** after the CW 2206 was mailed.
- If the first parent was sanctioned, the second parent is required to meet the family's 35-hour requirement unless the first parent cures his or her sanction.

Two-parent household – Both Parents Exempt (one parent temporarily exempt and second parent otherwise WTW exempt)

In a two-parent household if both parents are exempt, only the parent granted the temporary exemption is required to attend the Reengagement Evaluation appointment.

The mandatory parent must meet the two-parent participation requirement of 35 hours per week unless the exempt parent chooses to volunteer and contributes to the family's 35-hour per week participation requirement.

NOTE: If the exempt parent's exemption is based on a disability, the mandatory parent would be required to participate for the applicable number of single-parent hours (20 or 30), based on the age of the children.

**INTERCOUNTY
TRANSFER**

An individual who has completed the reengagement process in the sending county is considered a mandatory participant who has been reengaged in any county to which he or she transfers.

If the client has not been reengaged by the sending county, the client becomes part of Orange County's reengagement sequencing which is at RRR. Orange County will use the sending county's RRR date for purposes of the reengagement sequence.

It is the responsibility of the ISW to determine the sending county's RRR date.

Refer to ICT Reengagement Guidelines, Attachment II.

If the reengagement process was initiated in the sending county but the individual has not signed a new WTW 2, the reengagement process will continue in Orange County with the ISW.

If the individual was non-compliant with the reengagement process in the sending county, then Orange County will continue the non-compliance process until the individual is reengaged, determined to be exempt, or sanctioned.

**REENGAGEMENT
DATA TRACKING
AND REPORTING**

Counties must ensure that reengaged individuals are identified and appropriately tracked on the Welfare Data Tracking Implementation Project (WDTIP) Tracking Recipients Across California (TRAC) system.

The TRAC system will be modified in the future to track the reengagement process for individuals once they receive the Reengagement Evaluation Notice (CW 2206-1, 2, 3, or 4).

**COMMUNICATION
/ CASE
COMMENTS**

Ongoing communication between the OSW/ISW and the CM is essential to ensure the reengagement process for all individuals formerly granted a WTW temporary exemption is completed correctly. Communication is also critical to ensure that supportive

services are provided appropriately.

CalWIN Case Comments must be updated to reflect information obtained, and actions taken, during the reengagement process.

**FORMS AND
ATTACHMENTS**

Attachment I	<u>WTW Reengagement Processing Guidelines</u>
Attachment II	<u>ICT Reengagement Guidelines</u>
CW 2206	<u>Reengagement Informing Notice</u>
CW 2206-1	<u>Reengagement Evaluation Notice: <i>Individual Not Participating</i></u>
CW 2206-2	<u>Reengagement Evaluation Notice: <i>Individual Partially Participating</i></u>
CW 2206-3	<u>Reengagement Evaluation Notice: <i>Individual Fully Participating</i></u>
CW 2206-4	<u>Reengagement Evaluation Notice: <i>Individual Fully Participating</i></u>
CW 2186A	<u>Reengagement Evaluation Notice: <i>Individual Fully Participating</i></u>
GEN 1365	<u>Reengagement Evaluation Notice: <i>Two-Parent Household, One Parent already Participating</i></u>
Worker Tool 10	<u>CalWORKs Exemption Request Form</u>
	<u>Notice of Language Services</u>
	<u>CalWORKs/WTW Reengagement Program Flow</u>

REFERENCES

ACL 13-01	Reengagement of CalWORKs Short-Term Exempt
ACL 13-59	Individuals
ACL 12-67	Third Set of Questions and Answers for SB 1041
ACL 12-72	CalWORKs WTW 24-Month Time Clock
ACL 12-69	CalWORKs SB 1041 Extension of Short Term
Policy 211	Changes and The New Young Child Exemption
Policy 100-F1	Alignment of CalWORKs Hourly Work Participation
Policy 240	Requirements to Federal TANF Requirements
Policy 207	Welfare to Work Plan
	WTW Exemptions
	Good Cause/Compliance/Sanction
	WTW 24-Month Time Clock