



TRAINING MANUAL

Work Programs
Colorado Employment First
Kathy Mahoney, Program Administrator
1575 Sherman Street, 3rd Floor
Denver, Colorado 80203-1714
(303) 866-2629
(updated 11/02)

Links to Sections

Program Overview

Referral Process

Orientation and Assessment

Components

Closures

Reimbursements

Regulations

Forms

Accounting Codes

In-Kind

OVERVIEW OF THE EMPLOYMENT FIRST PROGRAM

The goal of the federal Food Stamp Employment and Training Program as stated in the legislation establishing the program is: "Assist food stamp recipients in gaining skills, training or experience that will increase their ability to obtain regular employment."

In Colorado, the Employment First Program goals are to (1) get people to work and (2) reduce individuals' dependence on public assistance. Progress toward these goals is measured by the number of job placements, number of individuals successfully completing an education component, and the number of sanctions imposed for failure to comply.

The methods employed in Colorado to meet both the federal and State goals are based on several key beliefs about our mission. Basically, the philosophy which underlies our program design and emphasis includes the following beliefs.

Every intervention makes a difference.

Research done for several years before implementation of the Food Stamp Employment and Training Program nationwide showed clearly that any efforts made to emphasize the importance of looking for work resulted in an increase in employment and a decrease in the length of time on food stamps.

Every person deserves an opportunity/No one can predict what a person can accomplish.

Many individuals on food stamps are not served by other employment and training programs. This may happen because the programs are targeted to single parents, or to individuals with fewer barriers to employment. Many people on food stamps do not know what employment and training services or supportive services are available to them in their community. The Employment First Program should provide both information and direct services. Although a local Employment First program may exempt a limited number of people, the majority of people referred will receive services.

Everyone has a choice and all choices have consequences.

The Employment First Program emphasizes that each work registrant has an obligation to work at becoming self-sufficient. If they choose to accept food stamps, they also must agree to work with Employment First to find employment and to provide information on their own work search efforts. If they choose to forego this accountability, they accept the fact that they will not be able to continue to receive food stamps.

The Employment First program services are largely self-directed - the participant receives information and assistance, but the major responsibility for finding job openings is the participant's. The Employment First Program is not designed as a job match program, but as a competency program. Efforts are aimed at insuring that participants have the knowledge and the tools to locate job opportunities and to "sell" themselves as the best choice for the job.

Everyone must take responsibility for their choices.

The "comply" process makes it possible for a participant to reconsider actions which led to disqualification, and to undo the disqualification by re-complying with program requirements before a sanction takes effect. This puts responsibility for a disqualification firmly on the participant and not on "the system".

PROGRAM HISTORY

Public Law 99-198 (the Food Stamp Act of 1985) required that no later than April 1, 1987, every state would implement an employment and training program for food stamp work registrants. Work registrants are those individuals who are job ready or have barriers which can be addressed. They comprise approximately 10-12% of total food stamp recipients. The majority of food stamp recipients are children, elderly, or incapacitated.

The Food Stamp Employment and Training Program legislated in 1985 resulted from many years of trial and error as well as formal research and demonstration projects. A work registration requirement was first instituted in 1971, with the intent of encouraging food stamp recipients who could work to do so. This early work registration requirement received much criticism for being nothing more than a "paperwork" activity.

In 1977, in an effort to make work registration more meaningful, it became a joint function of the USDA and Department of Labor (DOL) at the national level. Locally, food stamp technicians required food stamp applicants and recipients who were judged able to work to register at the local job service center. However, penalties for failing to comply were seldom imposed and the process seemed to have little impact on the number of individuals going to work.

Between 1981 and 1984, the Food and Nutrition Service (now called Food and Consumer Service) conducted research demonstrations at eighteen sites across the country. Research results from demonstration projects that included both short term and long-term food stamp recipients, showed that **any** intervention helped to decrease time on food stamps and increase the rate of return to work. The quality and magnitude of the impact varied with the amount of time and money invested. This information was used to propose major changes in the content, structure and administration of the work requirements of the Food Stamp Program.

USDA also offered states the opportunity to participate in contractual demonstration projects. State food stamp agencies could decide how to administer the work registration and job search components. DOL was not the automatic partner. Colorado was one of 36 states choosing to participate in the demonstration. In May of 1983, programs were set up in Adams, Jefferson, and Larimer counties. The Department of Social Services in each of these counties chose to run the program themselves, rather than contracting with another agency. In 1985, the first program contracted by the local Department of Social Services to another agency, JTPA, was instituted in Arapahoe County. This established a precedent at the local level for cooperation with other local employment and training providers such as JTPA, Job Service or community based organizations such as Goodwill.

In 1992, Colorado started a workfare program allowed by legislation implemented in 1982 under President Reagan. The program known as "Section 20 Workfare" was optional for states and allowed "political subdivisions" to require recipients to work at a public or non-profit worksite for the number of hours resulting from dividing their food stamp grant by minimum wage. Those states choosing to implement a workfare program could apply to share in the food stamp savings resulting from those individuals leaving workfare for paid employment. For each person who found employment after beginning workfare, the program could apply for a one-time "enhanced reimbursement" equal to: (the reduction in the food stamp allotment due to wages) x 3/2.

In August 1996, the Personal Responsibility and Work Opportunities Act (PRWORA) was signed into law. Though the target of the legislation was primarily Aid to Families with Dependent Children (AFDC), the greatest savings were predicted from changes in the Food Stamp Program. These changes were intended to limit benefits paid to able-bodied individuals and legal immigrants. Able-bodied adults without dependents (ABAWDs) were required to work a minimum of 20 hours a week in order to qualify

for food stamps. This requirement was modified to allow “ABAWDs” to also receive food stamps if they were attending training classes 20 hours a week or participating in a workfare program. Merely **looking** for a job no longer was sufficient.

Employment First responded to the challenge of welfare reform by focusing on ways to help individuals stay eligible for food stamps while they continued to look for work. New training activities were put in place to improve participants “employability” by increased hours spent in classroom training and “homework”, improving reading, writing, communication, team work, and problem-solving skills. The workfare program was also expanded to provide more opportunities for those participants who were interested.

Program Participants

Compared to other adult food stamp recipients, the typical work registrant is more likely to be young, male, from a single-person household, from a household with no children, in a household with earnings, a non-recipient of AFDC, and a short-term recipient of food stamp benefits. A typical recipient averages 8.9 months on food stamps. A work registrant’s median receipt of benefits is 4 months.

Research has shown that certain characteristics of work registrants are associated with a long duration of participation in the food stamp program. Two of the most important of these are lack of recent labor market experience and low educational attainment. Both increased classroom training and workfare are intended to address these barriers.

THE REFERRAL PROCESS

The referral process begins at the food stamp office. When a person is applying for or being re-certified for food stamps, the food stamp technician determines whether each food stamp household member should be work registered and referred to the Employment First Program.

The food stamp technician assigns each individual in a food stamp household either an exempt or mandatory "Work Registration Code". The work registration code is data entered on the food stamp automated system (also know as the CAFFS system). The Employment First automated system also displays the work registration code on the Case Entry screen (CAE) and the ABAWD history screen (ABDH).

EXEMPT

Anyone assigned a work registration code "A" through "T" (see the Work Registration Code list on the following page) is considered "exempt" from work registration, and will not be referred to the Employment First program.

MANDATORY

Any individual between the ages of 16-60 who does not meet one of the exemption criteria is considered a mandatory work registrant and is referred to the Employment First Program. Work registrants are further divided into two groups - - ABAWDs and non-ABAWDs.

ABAWDs (Able-bodied Adults without Dependents)

Work registration codes "K" and "L" are assigned to those individuals who are considered to be Able-Bodied Adults without Dependents (ABAWDs). An individual is an ABAWD if:

- 1) They are between the ages of 18 - 50; and
- 2) There are no individuals in the food stamp household under the age of 18; and
- 3) They are not pregnant; and
- 4) They are not exempt from work registration for any other reason.

Work registration codes for ABAWDs:

- K is assigned when an ABAWD has not already received 3 months (consecutive or otherwise) of food stamps in a 36 month time period without meeting the ABAWD work requirement.
- L is assigned when an ABAWD has already received 3 months (consecutive or otherwise) of food stamps in a 36 month time period without meeting the ABAWD work requirement.

The Employment First automated system has a record of each ABAWD's 36 month start date (which may have begun as late as December 1, 1996) and end date. This may be found on either the Case Entry (CAE screen) or the ABAWD History Screen (ABDH). The EF system also tracks when an ABAWD receives a full month of food stamp benefits and does not meet the work requirement. These 3 months are referred to as the "first, second and third tickets" on the Case Entry (CAE) screen.

Non-ABAWDs

Work registration codes “U” and “V” are assigned to those individuals who are considered to be non-ABAWDs. An individual is a non-ABAWD if they are not exempt from work registration for any other reason and:

- 1) They are a 16 or 17 year old head-household; or
- 2) They are between the ages of 50-60; or
- 3) They are an 18-50 year old who lives in a food stamp household where there are individuals under the age of 18.

VOLUNTEER

An individual who fits the exemption criteria (work registration codes A – T) may choose to volunteer to participate in Employment First. These individuals are assigned work registration codes “W” or “X” instead of remaining coded the original exemption code.

ADDITIONAL INFORMATION

If a person referred to Employment First has a work registration code other than U, V, K, L, W, or X, the referral may be incorrect and the Food Stamp technician must be consulted.

A person may become exempt from work registration after being referred to Employment First. If this should occur, the person's Employment First case should be closed by the EF case manager and the information must be forwarded to the food stamp technician so they can change the work registration code from a mandatory code to an exempt code. See the "Case Closures" section for more information on closing an Employment First case to an exemption. If the person chooses to continue to participate as a volunteer, the case should be coded with a “V”, for volunteer, on the Case Entry (CAE) screen.

WORK REGISTRATION CODES

**80-E
FIELD
CODE**

EXEMPT CODES - Do not refer to Employment First

- A Person employed or self-employed working at least 30 hours per week **and/or** earning wages equal to minimum wage x 30 hours = \$154.50/week.
- B Person under 16 or over 60 years of age.
- C Person with physical/mental condition which would prevent him/her from working or person applying for SSI who has a medical statement . **An ABAWD must provide medical verification in order to be exempted under this code.**
- D Person caring for children under age 6 or caring for an incapacitated person residing in the household.
- E Rehabilitation (Vocational Rehabilitation)
- F Person **applying for or receiving** unemployment compensation. (If denied benefits and in process of appealing this decision, they are still exempt from work registration.)
- G Person subject to and complying with the requirements of a Title IV work program such as TANF.
- H Eligible student enrolled half time as defined by the institution.
- I 16 or 17 year old non-head of household. (16 and 17 year old head of household must work register unless enrolled in school or employment and training program at least half time.)
- J **Pregnancy (county option)**
- N Not included in food stamp allotment. (Do not change the work registration code to an N when imposing a sanction.)
- O Person in a drug or alcohol treatment program.
- P Register at next determination/job attached - expected to return to work within 60 days
- Q Person receiving SSI, SSA (Social Security Disability) or VA (Veteran's Benefits).
- T Registrant in Colorado Refugee Services program (CRSP).
- Z ABAWD special exemption

MANDATORY CODES - Must be referred to Employment First

- K Initial ABAWD**
- L ABAWD who has already received 3 months of food stamps in a 36-month time period without meeting the ABAWD work requirement through the EF program**
- M Striker/Register
- R Initial mandatory work registrant - affidavit (for non-Employment First counties only)
- S Subsequent work registrant - affidavit (for non-Employment First counties only)
- U Initial mandatory registration (non-ABAWD)
- V Subsequent mandatory registration (non-ABAWD)

VOLUNTEER CODES - Used for individuals who are exempt but would like to volunteer to participate in Employment First

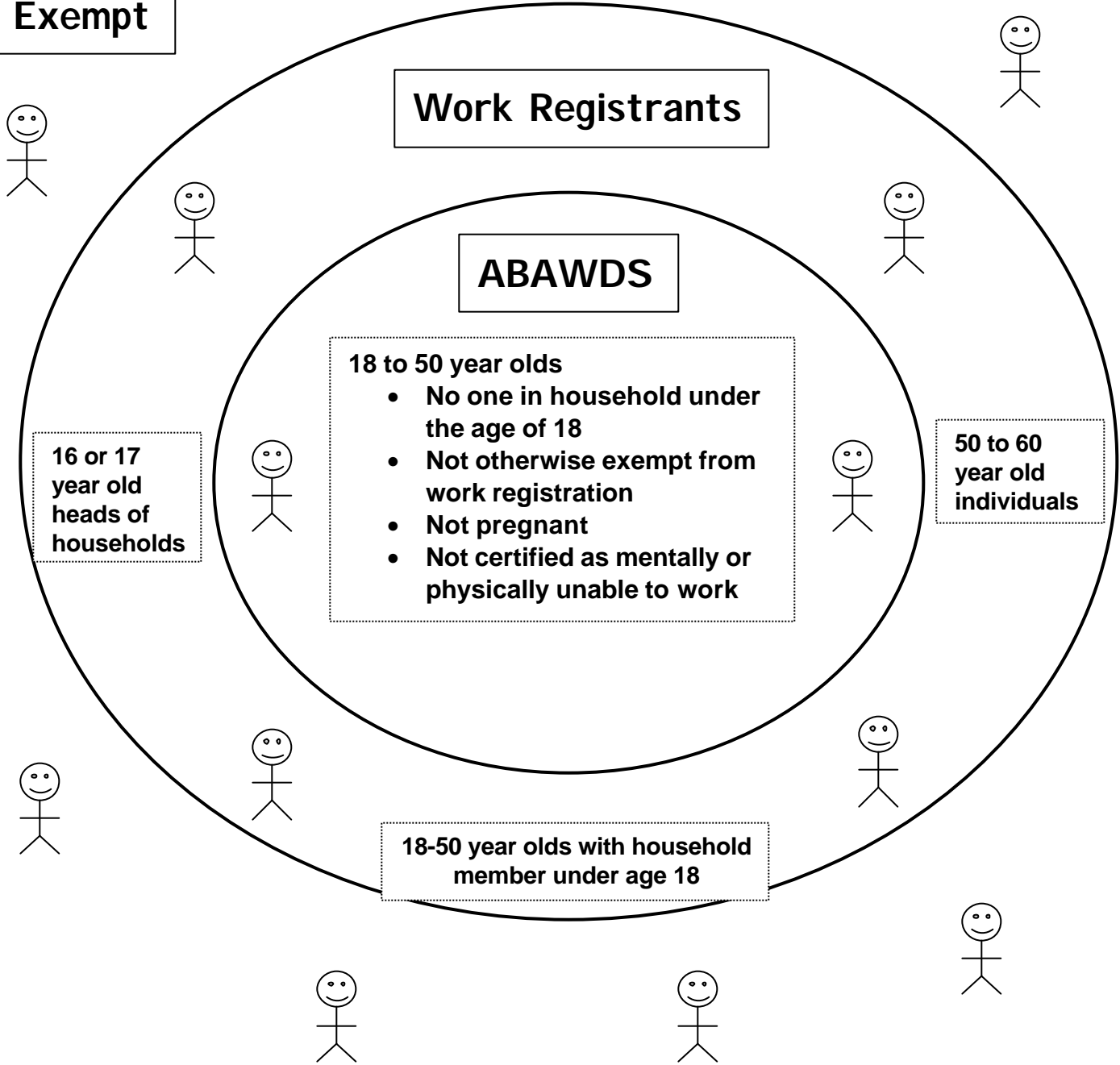
- W Initial voluntary registration
- X Subsequent voluntary registration

GENERAL REFERRAL PROCEDURES:

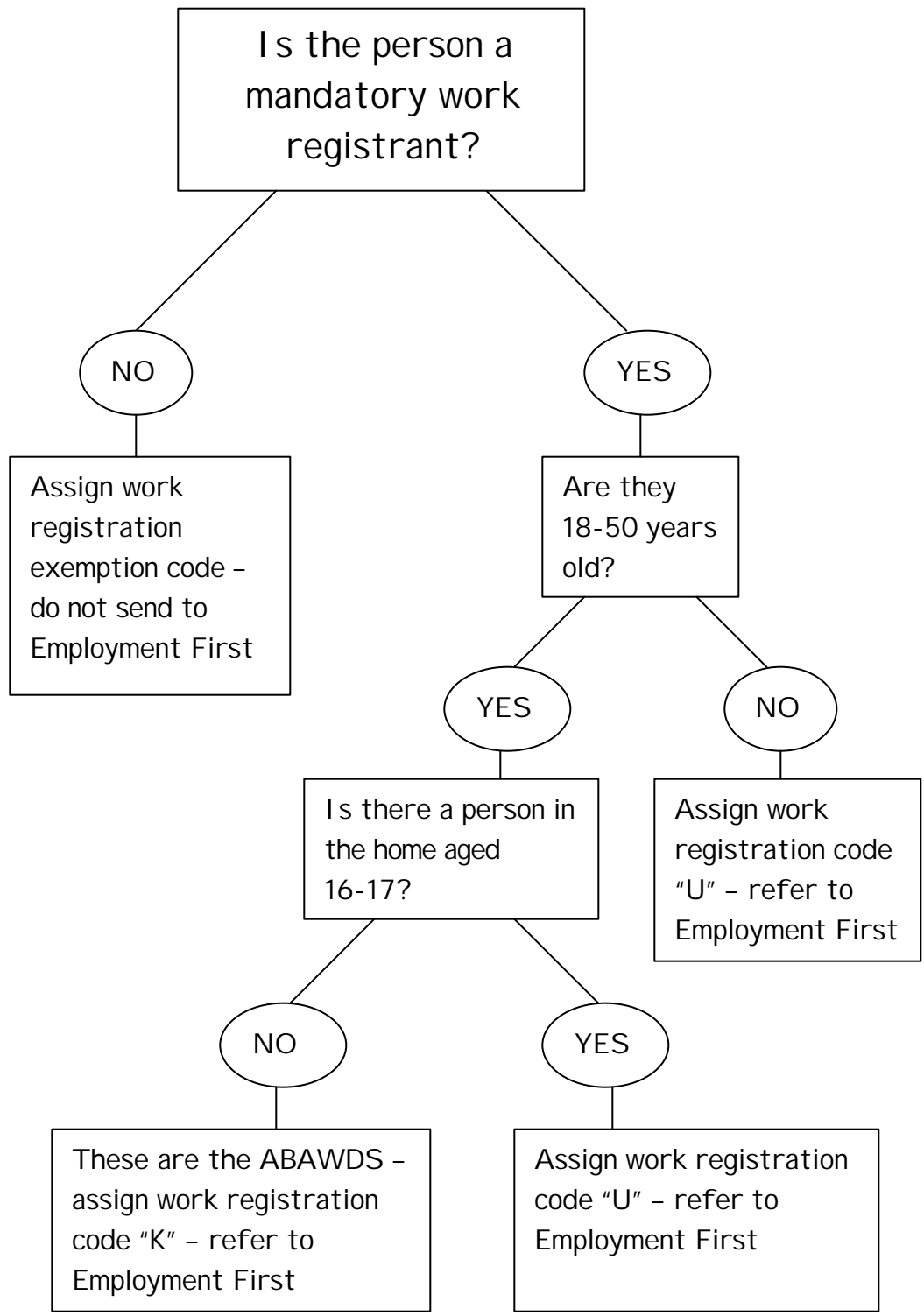
1. For every food stamp applicant and recipient determined to be a mandatory work registrant, the food stamp technician completes the **Work Registration/Employment First/Colorado Workfare Enrollment Form (EF-102)**.
2. Both applicants and recipients will be scheduled for their first orientation depending on the procedures agreed upon by the food stamp office and the local EF unit. The bottom portion of the EF-102 may be completed by the food stamp technician to indicate the date, time, and location of the scheduled appointment. The first appointment with Employment First must be scheduled for no more than 14 days from the date of referral from the food stamp office.
3. The food stamp technician gives the pink copy of the EF-102 to the work registrant, keeps the yellow copy for the food stamp file, and sends the white copy to the EF unit.
4. In order to be valid, the EF-102 must be signed by the participant or other adult household member.
5. The food stamp technician also gives a copy of the Colorado Food Stamp Job Search Work Registration--Rights and Responsibilities Form (FS-62) to each person being referred to Employment First.
6. EF will create a paper case file for every individual referred from the food stamp office which will contain all signed documents between EF and the participant. They will also data enter the information from the EF-102 onto the EF automated system using the Work Registration (WR) screen.

All Food Stamp Recipients

Exempt



Sorting Process for ABAWDS



How to Complete the Employment First Enrollment Form (EF-102)

Use the following link to view the EF-102 form:

<http://www.cdhs.state.co.us/oss/FAP/EF/Forms/ef-102.pdf>

1. **Participant SS#** - Clearly write in the social security number of the person who is being referred to Employment First.
2. **Today's Date** - Write in the date you are completing this form.
3. **Food Stamp Case SS# if different from Participant SS#** - Clearly write in the head of household's social security number if different from the person being referred to Employment First. If they are the same person, leave blank.
4. **GEO/ADMIN** - Write in the appropriate Geo Admin code for your food stamp office.
5. **Circle One: Mandatory/Volunteer** - Circle "Mandatory" if the individual being referred is being assigned a work registration code "U", "V", "K", or "L". Circle "Volunteer" if the individual is being assigned a work registration code "W" or "X".
6. **First/Middle/Last Name, Address, City, State Zip** - Clearly print this information.
7. **Birth Date** - Write the month, date and year of birth of the participant.
8. **ABAWD? Yes/No** - Circle "Yes" if the person being referred is an ABAWD. Circle "No" if they are not an ABAWD.
9. **Area Code and Phone Number** - Please write in the person's phone number or message number, if applicable.
10. **Food Stamp Case Name if different from Participant Case Name** - Write in head of household's First/Middle/Last name if different than the person being referred to Employment First. (optional)
11. **Date Last Worked** - Fill in the month and year the person last worked.
12. **Highest Grade Completed** - Write in the highest grade completed. If the person received their GED, please write in 12. If they completed trade school, community college or have received a 2-year or 4-year degree, please add the number of years completed onto 12.
13. **Currently Working - Yes/No** - Since Employment First will be working with individuals who work part-time, please circle "yes" if this is the case. If the person is not currently working, circle "no".
14. **Household Number** - If applicable, write in the household number for individuals who are receiving TANF and food stamps.
15. **TANF** - Please indicate if this person is jointly enrolled in the TANF program.
16. **UI** - Please check for individuals who are being referred to workfare who are also applying for or receiving unemployment insurance.
17. **F.S. Tech Number** - Write in the number of the food stamp technician who will be handling this food stamp case.
18. **Employment First/Colorado Workfare Address** - Write in or stamp the address of the EF office where the participant should report for their appointments.
19. **Appointment: Day/Date; Time; Case manager Name; Employment First Phone Number** - Provide all this information to schedule the participant for their first appointment with Employment First.
20. **Participant Signature and Date** - This form must be signed by the participant or another adult household member in order to be valid.

ORIENTATION/ASSESSMENT

The goals of the orientation/assessment process are:

- to build rapport with participants;
- to explain what the Employment First Program has to offer them;
- to explain program options and mandatory requirements;
- to ensure participants understand the consequences of not following through with program requirements;
- to begin the process of identifying participants' strengths, work history, skills, and employment barriers;
- to ensure that all ABAWD referrals understand the work requirement provisions;
- to determine the next step for the participant(s) in the program.

GENERAL PROCEDURES:

1. Following the SUGGESTIONS FOR AN EMPLOYMENT FIRST ORIENTATION attached in this section, the EF case manager facilitates either a group or individual orientation.
2. As a part of the orientation, individual(s) are asked to complete the Employment First Assessment Form (EF-910).
3. The EF case manager reviews the completed assessment form with the participant **to ensure that all questions have been answered**. At a minimum, during this first appointment, the case manager ensures that all the mandatory questions (the ones that require a response in the "Staff Only Use" section) are addressed on the assessment form. Depending on the amount of time and number of individuals in the orientation, the case manager may decide to continue a more in-depth assessment at the next appointment. Confidential issues that are brought up in a group situation may best be handled during an individual appointment, if the schedule permits.
4. Based on the information gathered from the assessment form and after briefly interviewing the participant during this process, the EF case manager, in mutual agreement with the participant, determines the next step.
5. The choices for the next step include:
 - a. Assignment to begin a component activity with Employment First (e.g. Job Overview, Employability, Workfare). Should this decision be made, a component contract is completed and signed by the participant and the EF case manager. A copy is placed in the participant's file. (See the Components/Contracts section for more details.)
 - b. Assignment to participate in a component where the services are provided by another program or agency (e.g. any of the education components, Vocational Rehabilitation, WIA or any other community based organization that may be providing services to EF

participants that meet the EF component criteria). If the participant is assigned to work with another program or agency, then the EF case manager instructs the participant to contact the agency or program to which the individual is being referred. The address, phone number and any other pertinent information about the enrollment process should be described to the participant. The participant then signs a Follow-Up Appointment Letter (EF-111) instructing them to return to EF (usually within 10 days - - the date and time of the next appointment are written on the letter) with documentation of their enrollment and participation with the other agency. A copy of the Follow-Up letter is placed in the participant's file. (See the Components/Contracts section for more details.)

*******IMPORTANT*******

The EF case manager must know whether a person is an ABAWD or not. Individuals with a work registration code “K” or “L” must be assigned to a component that meets the ABAWD work requirement. Please see the Components/Contract section for more specific information.

- c. Possible Exemption - If the individual provides either verbal or written information that would lead the EF case manager to believe that the person may be exempt from work registration, the following steps should be followed:
 - If the person does not have sufficient written documentation with them at orientation to justify closing the EF case on an exemption, then the participant is instructed to return to EF (typically within 10 days) with the appropriate documentation. The date and time of the next appointment, along with a description of the documentation needed, is written on a Follow-Up Appointment Letter (EF-111) and signed by both the EF case manager and the participant. A copy of the Follow-Up letter is placed in the participant's file.
 - If the participant has the appropriate documentation with them at orientation to justify an exemption, the EF case manager puts a copy of the documentation in the EF case file and closes the automated system case with the corresponding closure code. (See the Closure Section for more information.)
6. If additional information is needed to make an appropriate component assignment, schedule the participant for a follow-up appointment, usually within 10 days. The date and time of the follow-up appointment is given to the participant using the Follow-Up Appointment Letter (EF-111) or other approved form. It is signed by the participant and a copy is placed in the participant's file.
7. Always establish a date and time for the participant's next appointment with the Employment First unit using either a Component Contract (EF-205A) or Follow-Up Appointment Letter (EF-111), signed by the participant. Participants should always leave Employment First meetings with a clear understanding of what they are expected to do next, when their next appointment is, and the consequences of not following through with these requirements.

8. If an ABAWD is returning to the EF program, the case manager should be aware of how many months they may have already received food stamp without meeting the work requirement. This information may be obtained by either looking at the Case Entry screen (CAE) or the Appointment List (APPT). Both screens will show the months or number of months that the ABAWD already received a full month of food stamps without meeting the work requirement. This is helpful in determining the next step for the ABAWD.
9. After orientation, the EF case manager updates the automated system, including data entering component commencements, status changes, reimbursements, and employment information. ROC notes must also be updated. Copies of contracts, follow up appointment letters, and any other documentation must be placed in the participant's file.
10. If the participant did not attend the orientation, a Notice of Adverse Action (NOAA) must be sent to the participant within 5 calendar days of the act of non-compliance. (Schedule permitting, the case manager may give the participant up to 5 days to make-up the activity that they missed before sending the NOAA.) The case status must be changed to a status "5" on the Case Entry (CAE) screen as soon as the NOAA is sent to the participant.
11. The following section titled "Suggestions for an Employment First Orientation" provides some ideas for what might be said during the orientation.

SUGGESTIONS FOR AN EMPLOYMENT FIRST ORIENTATION

The following outline should be used as a guide when creating an Employment First orientation. All of the basic points in this outline should be included in your orientation, but you will want to add and subtract specific items of information according to what your county EF offers. For example, you should eliminate any component descriptions that your county does not offer, and add some specific details about your program.

INTRODUCTION

Welcome participants and introduce yourself. Explain how long the orientation will last and go over the agenda:

- What is Employment First?
- What does Employment First offer?
- What is expected of you?
- What happens if you don't participate?
- What happens next?

WHAT IS EMPLOYMENT FIRST?

Discuss the goal of the Employment First program, which is to assist individuals in the process of becoming employed. It is our job to enhance the skills that they already possess so that they can get the job they really want (give examples of past participants, if possible).

Also discuss what your role is in this process. (Will you be their case manager throughout the entire process? If not, what role do you have in this process? Who will they be working with?)

WHAT DOES EMPLOYMENT FIRST OFFER?

Job Finding Skills

The purpose of Job Finding Skills training is to assist you in finding a job as soon as possible, and to give you a chance to look for work.

It is our job and your job to understand what employers are looking for. (Discuss with group: Does anyone have any examples of what employers are looking for? What are you currently experiencing as you are applying for work?) We are going to spend a great deal of time making sure that you do not get screened out of the hiring process. We will be:

- working on a master job application which will organize your employment information to date and present your skills in the best way possible;
- practicing interviewing skills - it is important that you relate your skills to the type of work you are applying for, therefore, we will spend time identifying those skills and learning how to relate that information to a potential employer;
- assisting you in the process of determining what your skills are; some of your skills are job related, some are part of your personality. We'll take a look at what's important in

today's labor market -- which is rapidly changing and requiring us to have a variety of skills.

Education and Vocational Training

- If you did not finish high school, we can offer you the opportunity to do so now. It is extremely important to complete this step for your own career path. The number and kinds of jobs that you can apply for will also increase substantially (give some kind of statistics, examples, etc.).
- We can provide training that will update your basic job skills and increase your employability.
- We can assist you in finding vocational training if you are interested in a specific career.

Workfare

When you are out of work it is important to keep your skills and experience sharp. If you are interested in gaining new skills, learning about different organizations, or getting some recent work experience in the area, workfare may be your best option.

In the workfare program you would work a certain number of hours per week at a work site. (Give examples of worksites, if possible.)

Advantages to doing this are:

- Getting a good, local reference.
- Get to meet other individuals who may work in jobs that you are interested in doing.
- Gives you a structured activity to do while you are looking for work.
- Learn new skills.

Employers tend to hire people who are working (or doing volunteer work) rather than not working at the time of application.

Support Services

The following is a list of support services that are available to you through the Employment First program or elsewhere in the community to assist you during this time. Talk about monthly reimbursements available through your program. Also mention any other services available in the community for job referrals, clothing, food, haircuts, resume writing, etc.

WHAT IS EXPECTED OF YOU?

The recent Welfare Reform law states that able bodied adults who are receiving food stamps must be working at least 20 hours per week, or involved in a work or education program for at least 20 hours per week. After today's orientation, we will sit down together and decide what program option or combination of options will be best for your particular situation.

If you are already working part-time, your work hours count towards the 20 hours.

The Employment First options that will meet the 20-hour per week work requirement include:

- Education
- Vocational Training
- Workfare

The law allows for some exceptions to the work requirement. We will discuss this when we meet with you individually. Those people who do not have to meet the work requirement may participate in the Job Finding Skills component for a longer period of time.

WHAT HAPPENS IF YOU DON'T PARTICIPATE?

It is not acceptable to miss an appointment unless you have written verification of good cause. (Give examples: doctor's appointment, court appointment, etc.) If you do not have written verification of good cause, a notice of non-participation will be sent to your food stamp technician and the process will begin to deny your portion of food stamp benefits.

- If this is your **first violation** with the program, you will lose food stamps for one full month;
- If this is your **second violation** you will lose them for 3 full months;
- If it is your **third or subsequent violation**, you will lose benefits for 6 full calendar months.

If this should happen to you, you will need to return to Employment First and comply with program requirements (review specific county comply policy), before you can receive food stamps again. Complying with the program during the sanction period will not stop the sanction--the entire sanction period must be served. However, complying during the sanction period may enable you to be eligible for food stamps as soon as the sanction period ends.

WHAT HAPPENS NEXT?

Depending upon which program option is selected, you will be required to report (daily, weekly, every two weeks, monthly) to classes or appointments with your case manager on a regular basis until you are working at least 30 hours per week, you are exempt from participation, or you are no longer receiving food stamps.

If you have reason to believe that you should not be participating in Employment First, we will discuss this during your individual meeting. You may be exempt from participation if you can provide written verification that:

- you are already working and earning at least \$154.50/week
- you are under the age of 16 or over the age of 60
- you have medical verification that you are physically or mentally unable to work
- you are legally responsible for the care of a dependent child in the household under the age of 6 or an incapacitated person
- you are applying for or receiving unemployment insurance (unless your county offers a workfare program for individuals who are UI/food stamp recipients)
- you are applying for or receiving Temporary Assistance for Needy Families (TANF)
- you are pregnant
- you are a regular participant in a drug/alcohol rehabilitation program
- you have written verification that you are expected to return to work within 60 days
- you are applying for or receiving SSI, SSA or VA benefits
- you are currently working with the Colorado Refugee Services Program

CONCLUSION

We at Employment First want to ensure that you know your options and responsibilities with the program. Our goal is to assist you through this process. Again, we will be meeting with each of you individually to discuss your particular situation. Before we do, what general questions do you have?

HOW TO COMPLETE THE ASSESSMENT FORM

Use the following link to view the Assessment form:

<http://www.cdhs.state.co.us/oss/FAP/EF/Forms/assess.pdf>

The Employment First Program requires that an assessment form be completed for each participant at the first appointment or orientation. The purpose of the assessment is to get an accurate picture of the person's skills, work experience and barriers they may face in gaining employment. It is the job of the case manager to ensure that any barriers are addressed by supplying available supportive services either provided directly by the Employment First Program or through another community based organization.

Section I:

The box at the top of the form asks for basic information about the Employment First participant including their name, social security number, date of birth, address, phone number, mailing address (if different than home address), message phone number, and today's date (which is the date they are completing the form). The Employment First worker should fill in their name under "Employment First Case Manager" and ensure that all other spaces are completed.

Section II:

This section is divided into three columns:

- * *"Personal Data"* - 16 questions the participant responds to by either checking one of the given choices or by writing in an answer.
- * *"Staff Use Only"* - space for the case manager to respond to the answers given by the participant.
- * The far right-hand column contains a *"Key"* which corresponds to the first letter of one of the answers to the question to the immediate left under the Personal Data column. For example, the first box in the key column is a "Y". It corresponds to the answer "yes" to question #1, "Are you working?". If a participant responds to a question by checking the answer whose first letter corresponds to the letter in the "key" **then it is mandatory that the case manager write in a response in the "Staff Use Only" section. The response should include information about referral and resource information that is provided to overcome employment barriers, or, if not a barrier, how this information may or may not affect continued participation with Employment First.**

The following is a listing of all the questions, the answer the "key" response refers to, and an example of how the case manager may respond in the "Staff Use Only" section if the key answer is selected by the participant.

Personal Data:

Question #1: Are you currently working? __ "Yes" __ "No"

* **"Key"** response requiring a case manager explanation: **"Y" for "Yes"**

* **"Staff Use Only"** response(s):

If YES, please complete the following:

The case manager must ensure that the information is complete.

Orientation/Assessment-Page 11

a. Full / Part-time / Temporary / Day Labor (circle one):

Following these general guidelines, the case manager assists in determining what type of employment the participant currently has and whether or not this would exempt them from participation. (Please see the Employment part of the Closure Section for further information.)

Full-time - the person is working at least 30 hours per week and/or earns at least \$154.50/week. There is no end date to the job.

Part-time - the person is working less than 30 hours per week and/or earns less than \$154.50/week. There is no end date to the job.

Temporary - the person is working either full or part-time, and was (typically) assigned this job through a temporary agency. There is a definite end date to the job, or it appears that the job is not intended to continue indefinitely.

Day Labor - the person usually reports each morning to a place that assigns people to one day jobs. Sometimes the job lasts more than one day, but typically does not exceed 5 days. These are usually manual labor positions.

b. Start date:

This question is asked to determine whether or not the participant was working prior to the referral date. If the start date is **after** the referral date, credit can be taken for the employment information. The case may or may not be closed at this time depending on the number of hours, earnings and the situation.

Credit should not be taken on the automated system for employment begun **prior** to the referral date unless the food stamp technician was not aware that the participant was working when they referred them.

c. # Hrs per week:

Participants working 30 hours a week in a non-volunteer position and/or earning at least \$154.50/week are exempt from participation in Employment First. Case managers may decide to exempt those working less than 30 hours week and/or earning less than \$154.50/week (non-ABAWDs only) depending upon the circumstances of the case. For example, a 59 year old woman who has little work experience outside the home is only working 20 hours a week and earning less than \$154.50/week. The case manager may decide to close her case on

part-time employment since this may be the best she can do given her overall circumstances.

- d. Hrly wage:
Combined with the number of hours worked per week, the hourly wage will be used in determining whether or not an individual is earning enough income to exempt them from participation in the program. (Remember, however, that a person may be working 30 hours/wk, earning no income, and still be exempt.)
- e. Company Name:

Needed to verify and data enter employment information onto the Employment Entry (EME) screen. Also used to report employment information to the food stamp technician.
- f. Kind of Work:

Again, used to verify and report employment. May also be used to gain understanding of the type of work the individual is able to do and willing to perform.
- g. Phone Number:

Same as above (f).

In general, the case manager must make notes in the "Staff Use Only" section pertaining to whether the person may be exempted from participation or whether they will be assigned to a component or combination of components. The person's work schedule, and how often they are paid should also be noted if they are not going to be exempted.

Question #2: Circle Highest Grade Completed:

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16

Check any degree earned:

- High School Diploma
- GED
- Vocational Training Certificate
- 2 yr College Degree
- 4 yr College Degree

* **"Key"** response requiring case manager explanation: **"U 12" for "Under 12th grade"**

* Possible **"Staff Use Only"** response:

The case manager must encourage participants to take Adult Basic Education/GED classes if they have not received their high school diploma or GED certificate. If the participant agrees to do so, the case manager indicates that the participant has been referred to a GED program. For example, "Referred to community college for GED classes to begin 10/1/97." However, the participant may either refuse to go to GED classes or they may feel desperate to find work. If this is the case, the case manager needs to indicate this on the assessment form by either

writing, " Participant refused to go to classes," or "Participant expressed that he really needs to work right now and will not participate in GED at this time."

Question #3: Are you currently taking classes? _ Yes _ No

• **"Key"** response requiring case manager explanation: **"Y" for "Yes"**

• Possible **"Staff Use Only"** response:

The case manager must ensure that the participant has completed all the information to this question in the Personal Data section including the Name of the school or program, start and anticipated end date, days and hours of training and the kind of training.

The case manager must then determine whether the training classes alone will fulfill the required participation with Employment First program. If the case manager determines this may be sufficient, they will require documentation of enrollment and participation with the other agency to be brought to the next follow-up appointment (usually within 10 days). Please see the Component/Contract Section for more detail.

If the number of hours does not seem sufficient, the case manager may enroll the participant in another component as well as a training component -- as long as their participation for the month does not exceed 120 hours.

If the person is assigned to participate in more than one component, the case manager notes whether classes will interfere with any other EF participation. If case manager does not feel the classes are helpful or pertinent in contributing to the eventual self-sufficiency of the participant, they may require the person to participate in a component activity other than training.

Question #4: Are you currently working with another agency to find employment?

_ Yes _ No

• **"Key"** response requiring case manager explanation: **"Y" for "Yes"**

• Possible **"Staff Use Only"** response:

If the participant indicates that they are currently working with another agency or program, it would be important to know more about their involvement. Do they need to report regularly for classes or appointments? Is this on a voluntary basis or are they expected to fulfill requirements with this other program? Do they check in weekly just to look at their job board?

Depending upon their level of involvement, the case manager may ask the participant to provide verification of enrollment from the other agency. The case manager may sign a component contract with the participant to continue working with this agency.

If their level of involvement with the other program is not sufficient to fulfill the requirement of the Employment First Program, the case manager would assign them to another component in the EF program.

Question #5: Circle any of the following benefits you are currently receiving or applying for:

- **TANF (Temporary Assistance for Needy Families)**
- **AND (Aid to Needy Disabled)**
- **SSI (Supplemental Security Income)**
- **UI (Unemployment Insurance)**

- Other

"Key" response requiring case manager explanation: **"Any"**

- Possible **"Staff Use Only"** response:

AFDC

If the person is already receiving AFDC, they are automatically exempt with verification. If they indicate that they are applying for AFDC, they are exempt from participation with verification unless they are under a sanction period for non-compliance with EF. If they are under non-compliance with EF they must serve the remainder of the sanction and comply or regain with EF before they can receive food stamps again. However, they can qualify for and receive AFDC while they are under an EF sanction.

AND

It must be determined why the person is applying for or receiving AND before they can be exempted from participation. If they are receiving AND for disability purposes, they are exempt with verification. An ABAWD must have medical proof that they are unable to work, before they can be exempted.

SSI

Any individual (except ABAWDs) who are applying for SSI are exempt with verification. Anyone receiving SSI is exempt with verification. If a person is appealing a previous SSI denial, they are mandatory to participate with EF until a determination is made that they qualify for benefits.

UI

Individuals applying for or receiving UI are exempt with verification, unless the county has a workfare program which mandates their participation.

Other:

If the participant lists any other assistance, the EF case manager must determine whether this exempts them from participation. They should refer to the list of work registration codes in the Referral Section in making this decision.

Question #6: Do you have valid I.D.?

* **"Key"** response requiring case manager explanation: **"N" for "No"**

- * Possible **"Staff Use Only"** response:

Employers are required to complete an I-9 form for each new employee to verify citizenship. Employment First participants may not be hired for work if they cannot produce identification. In order to remove this barrier, the case manager may refer the person to an agency that can help them obtain either a Colorado I.D. or driver's license; or the program may be able to pay for such I.D.s with their participant reimbursement fund. Call your local Motor Vehicle Department to determine the cost.

Question #7: How will you get to work/classes?

* **"Key"** response requiring case manager explanation: **"DK" for "Don't Know"**

- * Possible **"Staff Use Only"** response:

If the person responds by checking "don't know" the case manager should ask a series of questions to help resolve this issue including: Can they car pool with someone or is there a car they can borrow? Can someone drop them off? Are things within walking distance? Is there a van pool or free shuttle system available? The case manager may also offer bus tokens, bus passes or gas vouchers depending upon what is available in their county.

Question #8: Are you currently homeless?

- * **"Key"** response requiring case manager explanation: **"Y" for "Yes"**

- * Possible **"Staff Use Only"** response:

Many people are in varying degrees of homelessness so the case manager needs to clarify the situation by asking the following questions:

- Are they currently staying in a local shelter or are they living on the street? If they are currently staying in a shelter ask how long they can stay there? What will they do when their time runs out? If they are currently living on the street the case manager should provide them with the names and addresses of shelters and other services available for the homeless in their community.
- If they are not in a shelter or living on the street, are they staying with friends or relatives? How long will they be able to do so? Do they have a back-up plan if things change and they are no longer able to stay there?

Question #9: Are you responsible for the care of a dependent under age 13 in the household?
___ **"Yes"** ___ **"No"**

- * **"Key"** response requiring case manager explanation: **"Y" for "Yes"**

- * Possible **"Staff Use Only"** response:

It is important for the case manager to look at the ages of the children, if any. If they are under the age of six, was the person referred in error?

Any children under the age of 13 require adequate day care. Does the person have day care arrangements made? If no, can a friend, relative or neighbor provide this service? The case manager must assist the individual in handling this barrier by providing day care money under participant reimbursement or by referring them to a local agency that can help.

Question #10: Health information related to working:

- * **"Key"** response requiring case manager explanation: **"Y" for "Yes"**

- * Possible **"Staff Use Only"** response:

If the participant answers "yes" to questions A, B, and/or C the case manager needs to gather additional information to determine whether the individual should be exempted from participation or not.

Remember, ABAWDs may only be exempted from participation with medical verification.

Individuals with severe disabilities that are not readily visible should be exempted from the program if appropriate medical verification can be obtained. Those who are not exempted because their restrictions are not severe enough to prevent them from working may either be referred to a vocational rehabilitation program or the case manager may work with them directly to place them in a component that can accommodate their restrictions. If the person is not exempted these are some important questions to be considered:

What are the work restrictions? Given the restrictions, what type of work can be considered? Does the person have the skills or experience to perform the duties required? Do they need additional training? What other alternatives are there?

Question #11: Are you currently involved with the court system?

* **"Key"** response requiring case manager explanation: **"Y" for "Yes"**

* Possible **"Staff Use Only"** response:

The case manager should ask for more details if the person checks "yes", or if they check that they are on probation or parole. Do they have specific court dates set? How many? Is this going to be a long-term or short-term process?

How long will the probation or parole period last? Does this require regular appointments with a probation or parole officer? Will these appointments interfere in any way with them attending classes or Employment First appointments?

Question #12: Have you ever been convicted of a felony? Does the conviction interfere with your job search?

* **"Key"** response requiring case manager explanation: **"Y" for "Yes"**

*Possible **"Staff Use Only"** response:

Assist the individual in handling some tough questions they may face on their applications and in their interviewing. They need to be prepared for potential employers to feel uncomfortable about the fact that they have been convicted of a felony. Most experts in the employment and training field recommend that they be honest during the interview rather than going into detail on the application. In an interview, the person should answer all questions honestly, but briefly. They should also focus on the fact that they have learned from their mistakes and that they have gained valuable work skills or achieved their GED while serving time. They should also express that they are motivated and ready to successfully work in a position where their skills can be utilized.

Depending on the kind of work they are seeking, the nature of the felony may be important. For example, an embezzlement conviction would affect the suitability of an accounting or bookkeeping position.

Question #13: Do you have a drug or alcohol dependency? Are you currently in treatment?

* **"Key"** response requiring case manager explanation: **"Y" for "Yes"**

* Possible **"Staff Use Only"** response:

If the person responds "yes" to this question, the case manager should provide the individual with information on where they can obtain treatment and help. This may also result in the case manager requiring participation in a treatment program as the primary EF component.

Question #14: Are you a veteran?

* **"Key"** response requiring case manager explanation: **No response required - optional question**

* Possible **"Staff Use Only"** response:

This is an optional question. If the participant indicates they are a veteran, it would be helpful for the case manager to give them information on Veteran's services available in the county.

Question #15: Are you registered with JOB SERVICE CENTER?

* **"Key"** response requiring a case manager explanation: **No response required - optional question**

• Possible **"Staff Use Only"** response:

This question does not require a response from the case manager, however, several, but not all counties require participants to enroll with the Job Service Center. The case manager may use the "Staff Use Only" section to determine if the participant is fully registered, as well as the registration and follow up dates.

Question #16: What kinds of jobs are you applying for?

* **"Key"** response requiring a case manager explanation: **No response required - optional question**

* Possible **"Staff Use Only"** response:

It is helpful to the case manager to know what type of work the individual is applying for. If an individual is unsure or if they answer "anything", it is a good indication that they need help identifying their skills and matching this information to the types of jobs they may be able to perform.

Last Question:

Is there any additional information you would like us to know, in order to serve you better?

Depending on whether the person answered this question, the case manager should discuss any other information the person would like to share. If they leave this answer blank, the case manager should ask anyway. Additional questions such as, "What type of work do you like?", "What are you good at?", "If you could have any job tomorrow, what would it be?" may also be asked just to get a better idea of the persons skills and abilities.

COMPONENTS AND CONTRACTS

As long as a participant is enrolled in the Employment First program, they must be actively participating in a component. The only exceptions to this may be:

- If you are requesting an individual to provide you with written documentation that will exempt them from participation. In general, participants are given 10 days to provide this information; or
- If the participant never showed for an appointment and is in the process of being sanctioned.

There are no "holding bins" or waiting lists.

GENERAL PROCEDURES:

1. After gathering information from the assessment form about a person's work history, skills, strengths, and barriers a decision must be made on a component assignment.
2. The component assignment should be beneficial to the participant, with the goal of increasing his/her ability to secure employment.
3. When making a component assignment, the case manager must know whether the individual is an ABAWD (work registration codes "K" and "L") or a non-ABAWD (work registration codes "U" and "V").
4. It is up to the county to decide which components to offer depending on the size of the caseload, available space and the number of staff. However, all counties must offer some components that meet the ABAWD work requirement discussed in this section.

NON-ABAWD COMPONENT ASSIGNMENT (For individuals coded "U" or "V"):

Non-ABAWDs may be assigned to participate in any approved EF component for a minimum of 3 hours per week, up to a maximum of 120 hours per month. **Component options are listed in the "Employment First Components" part of this section.**

ABAWD COMPONENT ASSIGNMENT (For individuals coded "K" or "L"):

According to the federal regulations, an ABAWD must meet the ABAWD work requirement in order to receive food stamps for more than 3 months (consecutive or otherwise) in a 36 month time period.

Specific component options that meet the ABAWD work requirement include:

WORKING	
Component Code:	Description:
WK or WF	Workfare (work at least the number of hours equal to the household's food stamp allotment divided by minimum wage)
WO	Work or do volunteer work an average of 80 hours per month

ATTENDING CLASSES AT LEAST 20 HOURS PER WEEK:

Component

Code:

Description:

EB	Adult Basic Education
EC	Post-secondary Education
EE	English as a Second Language
EG	GED Classes
EL	Literacy Classes
EM	Employability Classes
JA	Enroll and participate in any WIA (Workforce Investment Act) program
VT	Vocational Training
VR	Vocational Rehabilitation

All components except Workfare and Job Overview – (please see “Employment First Components” in this section for more information on the Job Overview component) may be combined to meet the ABAWD work requirement. For example, a person may work 10 hours per week and participate in GED the remaining 10 hours, for a total of 20 hours weekly participation. A person may work 11 hours per week and do 9 job contacts per week (the 11/9 Formula) for a total of 20 hours weekly participation.

ABAWDs with work registration code “K” or “L” must participate in a component that meets the ABAWD work requirement. They do not have the option to participate in Job Overview. They must continue to meet the ABAWD work requirement monthly in order to remain eligible for food stamps.

COMPONENT CONTRACTS

1. Each individual assigned to participate in a component must have a signed component contract on file. If a person is assigned to more than one component, there must be a corresponding contract on file for each component. In addition, each time a person is assigned to begin a new component, or if the timeframe of an existing contract expires, a new contract must be completed.
2. By regulation, the number of hours of participation combined with the number of hours worked for compensation (cash or in-kind) may not exceed 120 hours per month for any ABAWD or non-ABAWD.
3. Every contract must:
 - a. clearly define the requirements of the component - including dates and times of appointments or classes, as well as what is expected at each appointment or during each class;

EXAMPLE:

- "Participant will attend three classes on July 1,2, and 3 from 9:00 a.m. - 12:00 p.m.
- Participant is required to be on time - if later than 10 minutes they will be rescheduled and they will be counted as "absent".

- Participant is required to complete all homework.
- Participant may not attend class under the influence of alcohol or drugs.
- Any disruptive individuals will be asked to leave and their attendance will not be counted."

b. spells out the exact period of participation;

EXAMPLE:

"You will be required to participate in this component until you find full-time employment, you become exempt from participation, or until you are no longer receiving food stamps."

c. defines what non-compliance with the component would be:

EXAMPLE: "Non-compliance includes:

- Not attending class;
- Arriving late for class;
- Not completing the required number of job contacts;
- Not completing homework;
- Attending under the influence of alcohol or drugs;
- Disrupting class.

4. Commencement of a Component

Each component must be "commenced" by taking the first action required of that component. Once verification of commencement is received, the two letter component code is data entered on the Component Entry (COE) screen. Verification of commencement must also be recorded on the ROC Record of Contact (ROC) Screen.

- If your county offers workfare, then the "WE" component is commenced immediately by having the participant sign the EF-102 at the food stamp office. When a case is created on the EF automated system work registration screen (WR), the component WE will also be entered immediately on the component entry screen (COE). The commencement date of the WE component is the date the EF-102 was signed at the food stamp office. A participant may not be in the WE component for more than 30 days from the date of referral from the food stamp office. Please see page 13 in the Components section for more information on the "WE" Component.
- "JO" and "EM" components require documented attendance of the first appointment or class (if applicable). This component may also be commenced from documented attendance at the EF orientation.
- All other components require documented attendance of the first day of class or first day on the job.

EMPLOYMENT FIRST PROGRAM COMPONENTS

The following is a list of components that counties may offer Employment First participants. It is best to offer a variety of components to fit the various needs of the Employment First population. This, of course, will depend on the number of staff, amount of space, and available resources within the community.

All non-ABAWDs (work registration codes U or V) may participate in any combination of components for a minimum of 3 hours per week and a maximum of 120 hours per month. However, to meet the work requirement, ABAWDs (work registration codes K or L) must participate in a component or combination of components (except Job Overview) for a minimum of 20 hours per week.

Any participant assigned to workfare, whether an ABAWD or not, may be required to work up to the number of hours equal to their food stamp allotment divided by minimum wage. A participant may not be mandated to participate in both workfare and another component. However, participants who are enrolled in Workfare may volunteer to participate in another component at the same time. Please see the Colorado Workfare program manual for more information.

A component contract must be in each individual's casefile for each component assignment. If a person is participating in a combination of components, a single contract which outlines all the requirements may be used.

Credit for component commencement may not be entered onto the automated system Component Entry screen (COE) until the first step of the component has been taken and verified.

EDUCATION COMPONENTS:

- **EB - - Adult Basic Education**

For participants who test between the 5.5 and 8.5 grade level. Participants attend remedial education classes weekly. Homework may also be assigned.

- **EC - - Post Secondary Education**

For participants who are enrolled at least half time in school and working towards an Associate or Bachelors Degree.

- **EG - - G.E.D. Preparation**

For participants who test at or above the 8.5 grade level. Students attend pre-GED classes weekly in preparation to take the GED test. Homework may also be assigned.

- **EL - - Literacy**

For participants who test at or below the 5.5 grade level. Students attend remedial education classes weekly. Homework may also be assigned.

- **EE - - English-as-a-Second-Language**

English language classes for participants whose primary language is other than English and whose lack of basic language skills presents a barrier to employment.

Case management procedures for EB, EC, EG, EL & EE:

Participants sign a follow-up letter or contract agreeing to sign up with the local program or school and return with verification of enrollment within 10 days. Once verification of enrollment is received, a component contract is signed which specifically defines the classroom days and hours the participant is required to attend. Completion of all homework and classroom assignments may also be added to the contract. Employment First requires receipt of attendance every two weeks for ABAWDs and non-ABAWDs. Attendance verification may be obtained by scheduling an appointment with the participant, or Employment First may make other arrangements with the education provider to obtain attendance records. All of these components may be combined with Job Search (the 11/9 Formula) to meet the 20 hours weekly requirement. For example, a person may attend Literacy classes 11 hours per week and make 9 Job Contacts per week to meet the 20 hour weekly requirement.

ABAWDs may combine EB, EC, EG, EL, EE with any other component, except workfare or JO, to meet the 20 hours per week work requirement. They may also use the 11/9 Formula: 11 hours of component and 9 hours of Job Contacts.

Verification of commencement: Once enrollment verification is received for EB, EC, EG, EL or EE, the first day of enrollment with the program is the commencement date. Verification may be received in writing or by phone. If verified by phone, the name and phone number of the education staff person must be noted in the case file or on the automated system ROC (Record of contact) note screen.

- **EM - - Employability**

Participants are required to attend classes or receive individual instruction on basic skills that increase employability. Instruction may include, but is not limited to: improving writing, reading, math, communication skills and customer service training. The competencies (completing a master application, mock interview and job search plan) must also be incorporated into this component.

Case management procedures:

Participants sign a contract agreeing to attend classes or appointments with Employment First or other site that holds the classes at least every two weeks. Classroom or individual instruction combined with homework assignments must equal 20 hours per week of participation. The 11/9 Formula : 11 hours of class & homework and 9 Job Contacts per week can be used to meet the 20 hour requirement.

ABAWDs may combine this component with any other component, except workfare or JO, to meet the 20 hour per week work requirement. The 11/9 Formula: 11 hours of class & homework and 9 Job Contacts per week can be used to meet the 20 hour requirement.

Verification of commencement: May be commenced by attending the Employment First orientation if an activity was facilitated or if an assignment was given. Otherwise commencement would occur when the next appointment or class was attended.

WORKING

- **WO - - Working part-time**

For participants who are already working at least 20 hours per week and earning at least minimum wage (or receiving documented remuneration equal to minimum wage). Also for participants who are currently volunteering for a non-profit or public business. The 11/9 Formula can also be used: 11 hours of work per week and 9 Job Contacts per week to meet the required 20 hours per week.

Case management procedure:

Once employment or volunteer information has been verified with the employer, a contract is signed by the participant, requiring them to bring in verification of continued employment or volunteer status to the Employment First office. The information must contain the total number of hours worked and the total wages earned. Enter the volunteer's information as a job on the EME screen but there will be no hourly wage to enter. There will be no sponsor contract for the volunteer. Information may be brought into the Employment First office in person or it may be mailed or faxed. A participant would continue in this component until they are working at least 30 hours per week (averaged over at least 30 days) and/or earning at least \$154.50/week. ABAWDs and non-ABAWDs must be seen every two weeks in this component.

ABAWDs may combine this component with any other component, except workfare or JO, to meet the 20 hour per week work requirement.

Verification of commencement: Once employment or volunteer information has been verified with the employer the date of commencement would be the first day of employment or the first day of volunteer work. If the employment or volunteer status began prior to being referred to Employment First, the commencement date would be the date the component contract was signed.

- **WORKFARE**

Any participant assigned to workfare, whether an ABAWD or not, may be required to work up to the number of hours equal to their food stamp allotment divided by minimum wage. The worksite must be at a non-profit or public worksite.

Case management procedures:

EF signs an Employer Agreement with the worksite. Participants sign a contract agreeing to work at the worksite for a specified number of hours per week. Bi-weekly attendance must be submitted to EF. Please see the Colorado Workfare program manual for additional procedures and information.

ABAWDs may not be mandated to combine this component with any other component to meet the work requirement.

Verification of commencement: The first day of work at the worksite must be verified and documented in the case file or on the automated system.

JOB FINDING

- **JA - - Workforce Investment Act (WIA)**

For participants who are enrolled and participating in any WIA program.

Case management procedure:

Participants sign a follow-up letter or contract requiring that within 10 days they contact the local WIA program and either attend a first appointment or WIA orientation or they provide proof of their first appointment with WIA if it cannot occur within the 10 days. Once verification of enrollment with WIA is received, a component contract is signed which specifically requires the participant to attend all WIA appointments or workshops and to complete all assignments required by WIA. Employment First requires verification of continued attendance with WIA which may be obtained by scheduling an appointment with the participant, or Employment First may make other arrangements with WIA to obtain attendance records. ABAWDs and non-ABAWDs must have attendance records verified every two weeks. The

11/9 Formula may also be used: 11 hours of WIA per week and 9 Job Contacts per week to meet the 20 hour per week requirement.

ABAWDs may combine this component with any other component, except workfare or JO, to meet the 20 hour per week work requirement. WIA must provide 20 hours per week of activity for this component to meet the ABAWD work requirement. If 20 hours cannot be guaranteed, then this component must be combined with another component to meet the work requirement.

Verification of commencement: The first day of enrollment with WIA is the commencement date. Verification may be received in writing or by phone. If obtained by phone, the name and phone number of the WIA staff person must be documented either in the case file or on the automated system ROC notes (Record of contact screen).

- **JB - - Self-Employment Classes**

For participants who are interested in taking classes to learn how to start their own business. Classroom attendance is required as well as completion of all homework assignments and attendance at any individual appointments. The provider is usually the Leading Edge Program through the Small Business Development Center. This component must equal 20 hours of participation for an ABAWD to meet the work requirement. The 11/9 Formula can also be used: 11 hours per week of classes and 9 Job Contacts per week to meet the 20 hours per week requirement.

Case management procedure:

Participants sign a follow-up letter or contract requesting that the individual sign up with the local provider of self-employment classes and return with verification of enrollment in 10 days. Once verification of enrollment is received, a component contract is signed which specifically requires the participant to attend all classes, appointments or workshops and to complete all assignments required by the program provider. Employment First requires verification of continued attendance which may be obtained by scheduling an appointment with the participant, or Employment First may make other arrangements with the provider to obtain attendance records. ABAWDs and non-ABAWDs must provide attendance verification every two weeks.

ABAWDs may combine this component with any other component, except workfare or JO, to meet the 20 hours per week work requirement.

Verification of commencement: The first day of attendance at the self-employment classes would be the commencement date. Verification may be received in writing or by phone. If obtained by phone, the name and phone number of the staff person must be documented either in the case file or on the automated system ROC notes (Record of contact screen).

- **JO - - Job Seeking Skills – for non-ABAWDs only**

Job seeking skills instruction provided either individually or in a classroom setting that includes progressive work on completing a master application, interview and job search plan (otherwise known as the competencies). May also include, but is not limited to instruction on other job finding topics such as goal setting, skills identification, job retention, resume writing, etc.

Case management procedure:

A contract must be signed for the JO component. At a minimum, participants must be seen at least every two weeks. At each appointment, there should be documentation contained in the file that at

least one of the competencies was worked on until competency has been achieved in all 3 areas. Activities leading up to the completion of a competency may include: handouts, reading assignments, watching instructional videos, etc. that pertain to the skills needed to find employment. Once a competency has been mastered, documentation must be made on the automated system ROC notes (Record of Contact) screen. Example: "Achieved competency on the master application." The 11/9 Formula: 11 hours of JO Class & Homework and 9 Job Contacts per week can be used to meet the 20 hour requirement.

ABAWD note: This component does not meet the 20 hour per week work requirement for ABAWDs. Therefore, ABAWDs may not participate in this component.

Verification of commencement: Attendance at the Employment First orientation or at a JO class or appointment.

VOCATIONAL ASSISTANCE

- **VR - - Vocational Rehabilitation**

For participants who want to work, but have some physical or mental limitations. Vocational rehabilitation must offer 20 hours per week of activity in order for this component to meet the ABAWD work requirement.

Case management procedure:

Participants sign a follow-up letter or contract requiring documentation within 10 days that the individual has a first appointment scheduled or has attended the first appointment with vocational rehabilitation. (In some areas it may take longer than 10 days for the first appointment to occur.) Once verification of enrollment is received, a component contract is signed which requires the participant to continue working with vocational rehabilitation. This may include attending appointments or providing information to the vocational rehabilitation office. Employment First requires verification of continued participation with vocational rehabilitation which may be obtained by scheduling an appointment with the participant, or Employment First may make other arrangements with the vocational rehabilitation office to verify this information. ABAWDs and non-ABAWDs must provide attendance verification every two weeks.

The process with vocational rehabilitation may vary depending on what information may be needed to properly assess a person's ability to work. Therefore, it may be necessary to combine this component with another in order to meet the ABAWD work requirement.

Verification of commencement: Attendance at the first appointment or orientation with vocational rehabilitation is the date of commencement. This may be verified either in writing or a phone call to the vocational rehabilitation office is acceptable. If a phone call is made, the name and phone of the staff member must be documented in the case file or on the automated system ROC (Record of contact) note screen.

- **VT - - Vocational Training**

For participants who are enrolled and participating in skills training related to a specific occupation (i.e. welding, word processing, auto mechanics, truck driving school, data entry). Usually offered in cooperation with a WIA program, the local community college, or trade or vocational schools. This component must equal 20 hours of activity in order to meet the ABAWD work requirement. The 11/9 Formula can be used: 11 hours of VT and 9 Job Contacts per week to meet the 20 hours per week requirement.

Case management procedure:

Participants sign a follow-up letter or contract to return to EF in 10 days with verification of enrollment in the vocational training program, or that a first appointment has been set. Once verification of enrollment is received, a component contract is signed which specifically defines the classroom days and hours the participant is required to attend. Completion of all homework and classroom assignments may also be added to the contract. Employment First requires verification of continued attendance which may be obtained by scheduling an appointment with the participant to provide verified attendance, or Employment First may make other arrangements with the education provider to obtain attendance records. ABAWDs and non-ABAWDs must verify attendance every two weeks.

ABAWDs may combine VT with any other component, except workfare or JO, to meet the 20 hour per week work requirement.

Verification of commencement: Once enrollment verification is received for VT, the first day of enrollment with the program is the commencement date. Verification may be received in writing or by phone. If verified by phone, the name and phone number of the education staff person must be made in the case file or on the automated system ROC (Record of contact) note screen.

- **WE – 30 Day Job Search**

The “WE” component is part of the Workfare Regulations. Those regulations state that a person can be assigned to complete up to 30 days in Job Search before being assigned to a permanent worksite. The 30 days begin with the signing of the EF-102

Case management procedures for WE:

The food stamp technician will have all work registrants sign the EF-102 (revision date 11/01). This form contains the statement:

“I agree to begin the Workfare Program by making three (3) job contacts per week until I am assigned to begin work in a public service capacity or until I am assigned to participate in another activity.”

The EF-102 serves as the “Component Contract” for the “WE” component. By signing the EF-102, the person agrees to begin looking for work. After the EF-102 is data entered, the scheduled start date of the WE Component can be entered on COE. The scheduled start date for COE is the same date as the “Today’s Date” field on the EF-102. If a Master Job Application, a 511 Form (explained below), Job Contacts or other completed job search exercises are attached with the signed EF-102 then the actual start date which is the date the client started the job search activity is entered on COE. A pop-up window will then appear requesting hours and a brief ROC note telling how the component was commenced.

The following are some strategies for commencing individuals at the point they are signing the EF-102:

- 1) Staple a job search activity to the EF-102 such as a Master Job Application, Skills Identification Exercise, etc. The applicant is asked to complete the Master Job Application along with the EF-102. Both are forwarded to the EF office.
- 2) Staple the 511 Form (The enrollment form for the Workforce Development Center) to the EF-102. The applicant is asked to complete the 511 Form and the EF-102 at the Food Stamp Office and both are forwarded to the Employment First office.
- 3) If the individual has applied for a job the same day that they are completing the EF-102, the FS worker would ask them to record that job contact on the back of the EF-102.

You do not have to leave the person in “WE” for the full 30 days. Your ultimate goal after “WE” is workfare. It is advantageous to Initial Site the applicant at Orientation. Once you Initial Site the client, you close the “WE” component and enter the Workfare Site on the COEW screen.

The “WE” component can be commenced at Orientation. Having the client complete any of the job search activities mentioned above would serve as commencement. Commence “WE” at Orientation only if you do not Initial-Site a person, commence any other component or if you are waiting for exemption verification to be turned in.

(COMP.EF - Rev. 11/02)

CASE CLOSURES

An Employment First case may be closed for one of the following reasons:

- Employment
- Sanction
- Exemption
- Automatic closure caused by an action on the food stamp automated system
- Closure when the EF referral date is more than one year in the past
- ABAWD disqualification (this should only be done in consultation with State Employment First staff)

If a case needs to be closed as “opened in error” (the “02” closure code), the case manager must call a state staff person to do this closure for you.

A description of each closure process is given on the following pages.

EMPLOYMENT

When the EF unit is informed that a participant is working, the information is verified with the employer and entered into the Employment First automated system employment entry (EME) screen. Employment information can only be entered on the EME screen if the employment was obtained after the person was referred to Employment First or if the person was working prior to referral to Employment First, but failed to inform the food stamp technician. Employment information must be forwarded to the food stamp office, using the EF 123 form or any other acceptable means of communication between the offices.

Categories of Employment::

- "A" Jobs - Full-time employment is considered any employment that equals 30 hours per week times minimum wage or \$154.50 in weekly earnings, and which is expected to last 30 days or more.
- "B" Jobs - Any employment with weekly earnings less than \$154.50 per week, that lasts at least one eight hour day; or permanent part-time work; or a job that lasts less than 30 days.
- "C" Jobs - Typically temporary or "day labor" employment which is equal to or less than eight hours of work in a single day.

Closing the EF Case for Employment:

Full-time Employment

When a person begins working and is earning at least \$154.50 per week and the job is expected to be on-going (at least more than 30 days), they are considered exempt from work registration under federal guidelines and are no longer required to participate in the Employment First Program. After entering the employment information on the EME screen, the case is closed on the Employment First Case Entry screen (CAE), using the closure code:

29 - full-time employment

When this information is shared with the food stamp technician, he/she will change the participant's work registration code to an "A" on the food stamp automated system.

Part-time Employment

If a person obtains a category "B" job, (earning less than \$154.50 per week) and they are not an ABAWD, the EF unit may decide to close the participant's case to part-time employment. Closing a case on a "B" job is not mandatory, but the local EF unit may decide that this is appropriate in certain cases. After entering the job on the EME screen, the case is closed by the EF unit, using the closure code:

79 - part-time employment

When closing a case for part-time employment that is less than 20 hours per week, an explanation of why the person is not required to continue to look for full time work or otherwise participate in Employment First must be included in the ROC notes for the case.

If an individual who is working part-time does not meet the exemption criteria, that is, they are not working at least 30 hours per week, or they do not earn at least \$154.50 per week, then the

employment information is forwarded to the food stamp office, but the work registration code is not changed to an exempt code; it will remain a mandatory work registration code (either “U” or “V”).

ABAWDs Who Work Part-time

If an ABAWD obtains part-time employment equal to less than 30 hours per week, the EF unit must commence the WO component and track the person’s monthly hours and earnings (see the Employment First Component section for more information). If the employment is less than 20 hours per week, the WO component may be commenced and combined with another component that meets the work requirement (see the Component Section.)

SANCTIONS

A "sanction" occurs when an ABAWD or work registrant refuses to participate or fails to comply with program requirements. In general:

1. The same sanction process applies to all work registrants regardless of whether they are an ABAWD or non-ABAWD.
2. Only the individual who non-complied is disqualified from receiving food stamps.
3. Length of sanctions:
1st violation - 1 month loss of food stamps;
2nd violation - 3 month loss of food stamps;
3rd and all subsequent violations - 6 month loss of food stamps
4. An individual remains sanctioned until they serve the specified time period and comply or regain with Employment First.
5. The only way to stop a sanction once it has started is to become exempt from work registration by meeting the exemption criteria.
6. Before the start date of a sanction, a sanction may be stopped if:
 - The individual produces good cause verification for non-complying; or
 - The individual completes the comply or regain process before the start of the sanction.
7. There are two instances in which the food stamp technician will initiate a sanction. They are:
 - Refusal by a participant to sign the Work Registration form.
 - Voluntarily quitting a job.

When the sanction is for voluntarily quitting a job, the EF case will close. When the sanction is for refusing to sign the Work Registration form, there will not be an EF case. In both situations, the sanction will be recorded in the participant's "sanction history" on the ABDH screen of the EF automated system.

8. All sanctions other than those mentioned in #7 above are initiated by the Employment First program.

EMPLOYMENT FIRST SANCTION PROCEDURES

Within 5 calendar days from when a mandatory participant fails to comply with the Employment First program, the following steps must be taken by the EF staff:

1. Change the participant's case status to status "5" on the Case Entry (CAE) screen.
2. **Immediately** after entering the status 5, complete the Notice of Adverse Action form (NOAA) and mail it to the participant.
 - a. Enter the participant's name and address, social security number, the head of household's social security number (if applicable), and the name, address, and telephone number of the Employment First office under "Office Name, Address, and Phone #".
 - b. Check the appropriate box to indicate the reason for non-compliance.
 - c. Determine the length of the sanction by checking the Case Entry screen (CAE) and the Record of Contact screen (ROC) to determine if this client has been previously sanctioned under the new Welfare Reform regulations (since December 1996). If no previous sanctions exist, then this is a 1st violation. If one previous sanction exists since 12/96, then this is a 2nd violation, and so on. On the NOAA, check the box located next to the correct number of months that the person is being sanctioned (either one, three, or six months).
 - d. Write in the exact months of disqualification in the "You will be ineligible for food stamps for the month(s) of ____" section. For example, "January 1998 - March 1998". Sanctions always begin on the first of a designated month. To determine the start date, you must know the z-guard date for the particular month you are putting the case in status 5. (The state EF office sends out a Broadcast Message monthly to remind staff of the exact z-guard date for the month).
 - If the case is put in status 5 before the z-guard date, the disqualification will begin the following month. After data entering status 5 and pressing <enter>, the 80K field on CAE will change from a code "I" for included, to a code "G" for a sanction.

Example: The z-guard date for June is June 17th. If the case is put in status 5 before June 17th, the disqualification will begin July 1st.

- If the case is put in status 5 on or after the z-guard date, then the disqualification cannot begin until the month after the following month. After changing the status to 5 and pressing <enter>, there will be no change to the 80K field; it will remain a code "I" for included. The system will automatically change the 80K field to a "G" on the 1st of the following month, to allow the individual to still receive food stamps that month. (Food stamp issuance screens are automatically created on the last day of the month for the next month's issuance.)

Example: If the case is put in status 5 on or after June 17th, then the disqualification period will not begin until August 1st. The 80K field will automatically be changed to a "G"

on July 1st, but the individual will receive food stamps for July because their issuance screen was created on June 30th.

- e. On the bottom left-hand side of the NOAA, write in the date of noncompliance, which is the date of the missed appointment or missed action.
- f. On the bottom right-hand side of the NOAA, write in the date you are sending a copy of this form to the food stamp technician.
- g. Sign your name in the Signature line, and enter the date you are completing the form.
- h. Mail the top copy directly to the participant.
- i. Place a copy of the NOAA in the participant's file.
- j. Forward a copy of the NOAA to the food stamp technician.
- k. The day that the case is entered in status 5 determines the start date of the sanction, regardless of when the person non-complied.

Example: A participant non-complies on Wednesday, June 4th. The EF case manager does not take action on the case and goes on vacation. Upon returning on June 19th, the EF case manager puts the case in status 5. Because the status 5 is not being entered until June 19th (and after the z-guard date for June – which was June 17th) the sanction cannot begin until August 1st.

- l. It is crucial that the sanction period written on the NOAA match the system action. Otherwise we will be misinforming the participant of the action that is being taken on their food stamp case.

What to do when the case is NTON, or the food stamp certification period has ended

There is an edit in the system to prevent the sanctioning of people who are applying for food stamps, but have not yet been approved for them. These cases will have "NTON" on the CAE screen in the field where there would be a food stamp work registration code, or they will have a certification period that has expired.

1. When a status 5 is being data entered on a case that has either an NTON status or an expired food stamp certification period, the system will prevent the status 5 from being accepted and will automatically change the status to a 1 instead.
2. The case will then come up on the AGED report at the end of three weeks. By that time, the case manager must decide whether to continue with the sanction or not. (You should monitor the case and take action sooner if possible.)
3. When determining whether to continue with the sanction at the end of three weeks, you must look back at the original date of non-compliance. If the case has been certified in the meantime, check to see that the certification period covers the date of non-compliance. If it does, you may proceed with sanctioning the case. If the certification does not cover the date of non-compliance, or if the person was never certified for benefits, you may not sanction the case. See the examples of each below.

Example #1: the participant is scheduled to attend orientation on 3/2/99. The participant does not report for orientation. When attempting to put the EF case in status 5 the system gives you a message that it won't accept the status 5, since the case is in an NTON status.

The system puts the case in a status 1. Do not send the NOAA to the client at this point because it is uncertain as to whether you will be able to sanction this case.

In 3 weeks, which is 3/23/99, this case comes up on your AGED report. You check the CAE screen. The NTON status is gone and the client shows a cert thru 5/99. Since the certification began in the same month you are checking for compliance, you must look at the current month issuance screen, or EKEB on the food stamp system, to determine the date this case became authorized for benefits. If the authorization date is on or before 3/2/99, we can continue with the sanction. (If the case was authorized after 3/2/99, we cannot continue with the sanction.) To continue with the sanction, put the case in status 5 on 3/23/99. The effective date of the sanction would be 5/99 since the Z-guard date has already passed. The date of non-compliance at the bottom of the NOAA is still 3/2/99, even though the form is being sent 3/23/99.

Example #2: Following the same beginning as scenario #1, you find at the end of the three weeks that this case does not come up on your AGED report. This is because the food stamp case was denied and no benefits were authorized. The food stamp system swept and closed the EF case when this happened. No further action will be taken to sanction the case or work with the client since the client was never certified for benefits.

Example #3: Again, following the same beginning scenario in #1, on 3/23/99 this case comes up on your AGED report. You check CAE and see that the case is still in the NTON status. Create a tickler file to check case on 4/2/99 (since food stamps has 30 days to make determination of eligibility). If case certified on 4/2/99, follow steps in Example #1. If case is denied by that time, follow steps in Example #2.

Example #4: When putting the case in a status 5 you get the error message that the cert thru period has expired and the system automatically changes the status to a status 1. To determine

whether or not to continue with the sanction, you must go back to the date of non-compliance. If the client was certified for benefits on the date of non-compliance, you must request the assistance of the food stamp worker to sanction the case. The EF system will not create the "G" in the 80K field, so ask the food stamp worker to do so. This will create the sanction in our system and the action will sweep and close the EF case. The EF worker is still required to complete and send the NOAA to the client and forward a copy to the food stamp worker.

Example #5: Following the same beginning as #4 directly above, you determine that the client was not certified for benefits on the date of non-compliance. No further action is taken to sanction the case or to work with the client since they are not currently certified for stamps. Their food stamp case should sweep and close the EF case at the end of the month for failure to recertify.

THE COMPLY PROCESS

Non-ABAWDS (individuals with work registration codes U or V) and ABAWDs (with a work registration code K only) who have been sanctioned or who are in the process of being sanctioned may comply with program requirements in order to either stop a sanction from going into effect, or to receive food stamps again once the sanction period has been served.

The comply process does not apply to ABAWDS with a work registration code L. These individuals must follow the regain process defined on the next pages.

The county EF program must define a comply policy which describes in detail the actions that must be taken by the non-compliant individual. This policy may be the same for all individuals or it may vary according to any or all of the factors listed below:

- ABAWD or non-ABAWD complying
- Complying before or after a sanction has started
- Different actions are expected to be taken depending on the component the person was in when they non-complied.

Counties must have a clear comply policy in writing that is approved by the State Employment First office as part of their county plan.

COMPLETING THE COMPLY PROCESS

Before the sanction period begins:

If the participant begins the comply process before the start date of a sanction, the EF unit changes the case status on the Case Entry (CAE) screen from status 5 to any other status. This action will cause the code "G" in the 80K field to change to a code "I" and the person will not be sanctioned. The sanction will also not be recorded on the sanction history section of the CAE screen.

During the last two months of the sanction period:

If the participant begins the comply process during the sanction period and completes it before the end of the sanction, the participant serves the remainder of the sanction period. EF notifies the food stamp office that they have complied, but that they should not receive benefits until the rest of the sanction is served. The person's next appointment with EF will be scheduled for a date and time in the month following the end of the sanction.

After the sanction period has ended:

If the person completes the comply process after the sanction period has ended, EF notifies the food stamp office of the date of completion. In general, once the participant completes the entire comply process, the EF case manager sends a Comply/Regain notification form (EF-410) to the food stamp technician. It is then up to the food stamp technician to put the participant back on the food stamp system, following food stamp regulations. Once the food stamp technician removes the code "G" from the 80K field, the EF automated case can be reopened.

THE REGAIN PROCESS

Regain procedures only apply to ABAWDS with the work registration code "L". These individuals must "regain" rather than "comply."

An ABAWD will need to regain for one of the following reasons:

1. They became ineligible for food stamps because they received 3 months of food stamps in a 36-month period without meeting the work requirement and they are not currently being cited for non-compliance. There is no one, three, or six month period associated with this process. The person is just ineligible for food stamps until they complete the regain process; OR
2. They have already received 3 months of food stamps in a 36-month period and they are being cited for non-compliance with EF. In this case, they will need to serve the one, three, or six month sanction period and regain before they can qualify for food stamps again. The person may complete the regain process:
 - Before the sanction period begins. Should this occur the sanction will not be recorded in the Sanction History section of the CAE screen. The EF unit should change the case status from "5" to another status. This will cause the "G" in the 80-OK field on the food stamp system to change to an "I", and the person will not be sanctioned.
 - During the last two months of the sanction period. If the person begins the regain process during the sanction period and completes it before the end of the sanction, the participant serves the remainder of the sanction period. Once completed, the EF unit notifies the food stamp technician (using the Comply/Regain form, EF-410) that the regain has been completed but that the participant should not receive benefits until the rest of the sanction is served. The person's next appointment with EF will be scheduled for a date and time in the month following the end date of the sanction.
 - After the sanction period has ended. If the person completes the regain process after the sanction period has ended, EF notifies the food stamp office of the date of completion.

In order to regain, an ABAWD must complete **80 hours of a Non-Workfare Component** (working part-time, education, etc) or **12 hours of Workfare** within a 30-day period before food stamps can be reinstated. If a regain and sanction occur at the same time, the participant must complete the 80 hours of a Non-Workfare component or 12 hours of Workfare in a 30-day time period and serve the sanction months before they can receive food stamps again.

Once an ABAWD regains, they must continue to meet the 80-hour per month work requirement or participate in workfare monthly, in order to continue receiving food stamps. If they do not, they are sanctioned again for non-compliance, another sanction is imposed (for 3 or 6 months) and they must sit out the sanction period and regain before they can receive food stamps again in the 36 month time period.

Entering Component Information for Complies and Regains

When a case is in either a status 5 or 9, or when the case is closed on either a "20" or "89" closure code, the system will now allow you to go to the COE screen to enter component information. No matter what activity the client is participating in, including workfare, the component code "CR" (to signify comply/regain) is used. This component code is automatically entered by the system when you choose to go to COE.

Instructions for using "CR":

1. Type COE. Press <enter>. (system will give a pop up message asking you to confirm that you want a comply/regain component).
2. Type "Y" for yes. Press <enter>. (If you type "N" for no, you will be taken to the CAE screen).
3. System takes you to COE and automatically displays a "CR" component code and a "Y" under the EF column. (The system will not accept any other component code when it is in the comply/regain status).
1. Type in scheduled and actual start dates as applicable.
5. Hit <enter> for the system to accept all component information entered.
6. The CAE screen displays a ****COMPLYING**** or ****REGAINING**** message when a CR component is active on a sanctioned or disqualified case.
7. The CR component credits the ABAWD Unfilled/Filled counts while an ABAWD is in the comply or regain process.
8. A total count of all CR components data entered with Actual Start Dates is displayed on the hashmark screen.
9. A total count of all CR components closed with a "CS" (completed satisfactorily) component closure code is displayed on the hashmark screen.
10. If a participant becomes exempt after you have entered a CR component with a scheduled start date, close the component with a "CS" closure code. Don't enter an actual start date unless the person started the comply activity. The system will count the closure as a comply, but will not count a filled ABAWD slot since the person never actually commenced the activity.
11. All "CR" components that are more than 30 days old and still open in the system on the 7th of each month will be closed with an "IU" component closure code.

EXEMPTIONS

An ABAWD or work registrant may be exempted from the Employment First program if they can verify that they fall into one of the following categories. A copy of the written verification is placed in the EF file.

Closure Reason:	Closure Reason Code:
⇒ Institutionalized	12
⇒ Colorado Refugee Services Program	61
⇒ Dependent Care	62
⇒ Disabled (SSA, SSI, VA)	63
⇒ Disabled (other)	64
⇒ Pregnancy	65
⇒ Rehabilitation (drug, alcohol)	66
⇒ Unemployment Insurance	67
⇒ Under 16/Over 60 years of age	68
⇒ JOBS	69
⇒ Job attached	73
⇒ Legal action pending	74
⇒ Temporary medical	77
⇒ Vocational Rehabilitation	82

All of the closure reason codes that may be used by the EF unit may be found on the Employment First Desk Aide. This list may also be accessed by going to the CAE screen on SAM, and pressing the F1 key while on the "Closure Reason Code" field. These are the only closure codes that are available for use by EF staff, and are entered into the automated system by the EF unit. Any closure information that may affect the household income or size of the household is reported to the food stamp office using the EF 123 form or through other arrangements agreed upon by EF and the food stamp office.

If the person was an ABAWD, it is very important that the food stamp technician be notified immediately, so that the work registration code is changed. This is important because the ABAWD tracking process depends on the accuracy of the work registration code.

The following closure codes may be used only for a non-ABAWD. These typically cannot be verified but must be documented and justified in the EF file. Annually, no more than 10% of the total number of the county's EF referrals may be closed to one of these codes. They include:

Closure Reason:	Closure Reason Code:
⇒ Case opened or referred in error*	02
⇒ Completed program - no employment	70
⇒ Determined not job ready	71
⇒ More than 1 hour from the EF unit	75
⇒ Non-English speaking**	78
⇒ Temporary living situation**	80
⇒ Transportation problems**	81

* You must call one of the state field staff to have a case closed for this reason.

* Most EF units try to assist individuals with these barriers.

Closures for EF Cases Older Than One Year

If the referral date on an EF case is more than one year in the past, the EF case must be closed with the closure code "76." A new Work Registration Form (102) should be obtained if the person is still participating, and a new case is then started on the EF system with the new referral date. A closed case with a referral date more than one year in the past may not be reopened.

AUTOMATIC CLOSURES

Food Stamp Closures

If a participant's food stamp case closes, they are no longer required to participate in the Employment First program. The EF automated system "sweeps" the food stamp automated system nightly and picks up any changes. If a case has been closed by the food stamp office, the EF case will automatically be closed, and the closure reason code will appear on CAE and ROC. The last two digits of the code identify the reason that the case was closed. Please see the following page for a list of food stamp closure codes.

Cases closed as a result of a sweep of the food stamp system will be reported on the CLOS screen on SAM II. If the food stamp case is reopened, the EF case will reopen.

The exception to cases closed on the nightly "sweep" are cases that are in a status "5". These cases, which are scheduled to be closed for a sanction, will close:

- on the last day of the month, if the status "5" was entered prior to 14 days before the end of the month, **or**
- on the last day of the next month, if the status "5" was entered within the last 14 days before the end of the month.

The purpose of postponing the closure of these cases is to allow for the sanction notification required by law.

FOOD STAMP REJECTION/CLOSURE CODES

(REVISED 7/02)

- 01 - Residence (out of state only)
- 02 - Residence (out of county only)
- 03 - Failed to keep appointment
- 04 - Expedited household fails to provide verification
- 05 - Excess net income
- 06 - Household composition ineligibility
- 07 - Net income exceeds benefit level
- 08 - Excess gross income
- 09 - Excess resources
- 10 - Refused to cooperate with providing information
- 11 - Requested withdrawal
- 12 - Institutionalized
- 13 - Unable to locate client
- 14 - Failed to provide verification for application process
- 15 - Ineligible striker
- 16 - Application opened in error
- 17 - Case pending over 60 days
- 18 - Originally ineligible for recertification
- 19 - Failed to cooperate with QC
- 20 - Refused to cooperate with work/job search requirements
- 21 - Failed to cooperate with subsequent review
- 22 - Transfer of resources
- 23 - Ineligible alien household
- 24 - Death - FS-4A not sent
- 25 - Failed to reapply
- 26 - Used when no other Rej/Closure code appropriate
- 28 - Ineligible student
- 29 - Excess gross income
- 30 - Excess net income
- 31 - Recall closed case
- 32 - Ineligible for benefits
- 33 - RESERVED
- 34 - Greater than 165% poverty guidelines
- 35 - RESERVED
- 36 - household refused to comply with social security number requirements
- 37 - RESERVED
- 38 - non-continuing circumstance suspense
- 39 - RESERVED
- 40 - RESERVED

REIMBURSEMENTS

Participants must be reimbursed for expenses incurred while participating in the Employment First Program. Arrangements must be made ahead of time between the EF unit and the county to pay 20% of the total cost. There are two reimbursement categories:

1. \$25/month for costs associated with seeking employment. This may include reimbursement for transportation in the form of bus tokens, bus passes, gas vouchers; reimbursement for hair cuts, licenses, I.D.'s, motor vehicle records, shoes or work clothes, etc...
2. \$200/month for day care for each dependent under age 2 and \$175/month for each other dependent.

ADDITIONAL INFORMATION:

The EF unit must keep a record of all reimbursements. At a minimum, a log should be kept showing the participant's name, social security number and signature, along with the date of reimbursement, the dollar amount, and what the reimbursement is for (example transportation, hair cut, etc.).

COLORADO EMPLOYMENT FIRST FORMS

<u>Commodity #:</u>	<u>EF or FS#</u>	<u>Form Title</u>
615-82-22-8021	EF-102	Work Registration/Employment First/CO Workfare Enrollment Form
615-82-18-6203	FS-62	CO Food Stamp Job Search Work Registration Rights and Responsibilities
615-82-22-1232	EF-123	Notice of Change Form
615-82-18-0495	FS-4J	Notice of Adverse Action
615-82-22-8062	EF-106	(First) Appointment Letter
615-82-22-1117	EF-111	Follow-Up Appointment Letter
615-82-22-2511	EF-205-A	Participant Component Contract
618-82-19-0370		Works/Workfare Component Contract
615-82-19-0375		Works/Workfare Sponsor Agreement
615-82-22-2115	EF-211	CO Workfare Program Contract
615-82-22-2446	EF-224	FS Workfare Program Agreement
615-82-0000-16-190	EF-213	CO Workfare Initial Site Contract
615-82-22-3089	EF-308	Employer Contact Report
615-82-22-4103	EF-410	CO EF Comply/Regain Notice
615-82-22-9102	EF-910	Employment First Assessment
615-82-22-0010	EF-001	Master Application \$ 0.17/ea
615-82-22-0028	EF-002	Job Search Plan \$ 0.06/ea
615-82-22-0036	EF-003	Interview Analysis Sheet \$ 0.06/ea
615-82-22-2339	EF-233	Time Sheet and Evaluation Sheet

All forms come in packets of 50 except for the Master Application, Interview Analysis Sheet, and Job Search Plan which are sold individually.

For information on ordering forms, contact the Colorado State Forms and Publication Center (303) 321-4164 or the State Employment First Office at (303) 866-3391.

Work Registration/Employment First/Colorado Workfare Enrollment Form

(EF-102)

[Link to EF-102](#)

Purpose: To work register mandatory and volunteer participants.

Completed: By the food stamp technician

Copies: White: Employment First
Yellow: Food Stamp Case File
Pink: Participant

Special Instruction: There must be a work registration form completed for each participant. It is preferred that all participants have their first appointment with EF set before they leave the Food Stamp office. The work registration form can be signed by the person who came in for the food stamp interview, even if they are not the work registrant.

Food Stamp Workfare Participant Agreement: This section should only be checked, by the food stamp technician, for people receiving Unemployment Insurance or those in the JOBS program who are being referred to Food Stamp Workfare. This section is only used by counties that operate the Food Stamp Workfare program.

Employment First Participant Agreement: This box should be checked by the food stamp technician for all people other than those listed above.

**Colorado Food Stamp Job Search Work Registration - -
Rights and Responsibilities**

(FS-62)

Purpose: Inform participant(s) of Employment First Rules and Responsibilities.

Handed Out: By food stamp technicians to participant(s) when they are work registered.

File Change Form

(EF-123)

[Link to EF-123](#)

Purpose: Can be used as a communication form between the Food Stamp office and Employment First. Can be used as a data entry form.

Completed by: Food stamp technicians and/or Employment First staff.

Copies: Varies among counties.

Special
Instructions:

When Do I Notify the Technician? When Does the Technician Notify the Employment First Unit?

When a change occurs that may affect the size or income of a household, such as:

- Client institutionalized
- Client working
- Client caring for a dependent
- Client disabled or applying for SSI, SSA, AND or VA
- Client in drug or alcohol rehabilitation
- Client applying for or receiving UI
- Client under 16/over 60
- Client job attached
- Client temporarily disabled
- Client moves out of county/state
- Member leaves food stamp household
- Client requests withdrawal from food stamps

Notice of Adverse Action

(FS-4J)

Purpose: To advise Food Stamp Office of participant non-compliance.

Completed by: EF staff & food stamp staff.

Copies: White: Sent to participant
Yellow: Sent to Food Stamp Technician
Pink: Kept by EF
Goldenrod: Kept by EF

Special Instructions: For Section I - non-compliance for both ABAWDs and non-ABAWDs:

1. Fill in the participant's name and address, social security number, the head-of-household's social security number (if applicable), the Employment First office address, and phone number.
2. Check the appropriate box to indicate the reason for non-compliance.
3. Check the box for Section I.
4. Circle the correct sanction length - one month, three months or six months.
5. Write in the sanction month(s).
6. At the bottom of the form write in the date of non-compliance which is the date of the first missed appointment.
7. Write in the date that the NOAA is being sent to the food stamp office. This date should be no later than 5 days from the date of non-compliance.
8. Sign and date the form.
9. Send the top copy of the form to the participant. Keep a copy in the EF file. Put the case in status 5 immediately on the CAE screen.
10. Send a copy of the form to the food stamp technician.
11. If the EF case is in a status 5 on the last day of the month and a "G" is in the 80-K field, the EF case will sweep the food stamp system and close the EF case on a sanction closure code. It will also record on the CAE screen the start and end date of the sanction and whether it is a one, three or six month sanction.

Notice of Adverse Action

(FS-4J)

Special
Instructions
(continued..):

For Section II - - ABAWD Ineligibility

This section is only used when an ABAWD (who is not otherwise being cited for non-compliance) uses their third and last month of eligibility without meeting the ABAWD work requirement.

1. Check Section II.
2. Write the month that ineligibility will begin.
3. At the bottom of the form write in the month and year that the ABAWD received their third month of food stamps without meeting the work requirement on the "Date of non-compliance" line.
4. Write in the date that the FS-4J is being sent to the food stamp office.
5. Sign and date the form.
6. Send the top copy of the form to the participant. Send a copy to the Food Stamp Technician, and keep a copy in the EF file.

Appointment Letter
(First Appointment Letter)

(EF-106)

Purpose: Schedule participant for initial assessment appointment/orientation in special circumstances when scheduling the appointment on the EF-102 OR EF-103 is inappropriate.

Completed by: Employment First Staff.

Copies: Participant, case file.

Follow-up Appointment Letter

(EF-111)

[Link to EF-111](#)

Purpose: To inform participant of follow-up appointment.

Completed by: Employment First staff.

Copies: Original given to participant, copy to case file and copy for tickler file.

Component Contracts and Workfare Sponsor Contracts

(EF-205-A, EF-211, EF-224, EF-213 and Commodity numbers 618-82-19-0370 and 615-82-19-0375 respectively for Works/Workfare Component Contract and Works/Workfare Sponsor Agreement)

[Link to EF211](#)

[Link to EF213](#)

- Purpose:** To outline the responsibilities of participants assigned to any component
- Employment First units may create component contracts that apply specifically to components used in their program. These contracts must be approved by the State Employment First Office before being put into use.
- Completed by:** Employment First staff. If Site Contracts, the Site Sponsors must also sign the Agreement.
- Copies:** Participant and EF file and Sponsor if Workfare
- Special Instructions:** Should be fully explained at time of assignment to a component. Participant should not sign until he/she understands everything involved. Must spell out the requirements of the component, the timeframe or length of the component assignment, and the penalties for non-compliance.
- See Section 4 of the Training Manual, Components and Contracts for specific details.**

Record of Participant Reimbursement

(EF-718)

Record individual participant reimbursements. Establishes an audit trail.

Completed by: Employment First staff.

Special

Participant must sign in space provided for reimbursement received.

Employer Contact Report

(EF-308)

[Link to EF-308](#)

To record employer contacts made by participant. Job contacts may be required as part of Job Overview. They may also be required as a part of the Employability component, but they will not count towards meeting the ABAWD work requirement. Therefore, an ABAWD in the Employability component must fulfill their 20 hours per week with activities other than job contacts. The job contacts would actually be required in addition to the 20 hours per week. Under no circumstances can job contacts be required while a person is in the workfare component.

Completed: By participant.

Copy is kept in the case file; original is returned to participant.

Monitored: By case manager on random basis to check accuracy.

Operational

Disallowed contact - any employer contact the Case manager feels is not suitable or incomplete (i.e. no address or phone number listed for an employer).

Sanction Lift/Cure Form

(EF-410)

[Link to EF-410](#)

To inform the Food Stamp technician that a participant has complied or regained, or that the participant was sanctioned in error, and that the sanction should be lifted.

Use of this form is optional. The Food Stamp office may be notified of a comply or regain with the EF-123 form, or other method agreed upon by the Food Stamp office and the Employment First unit. The information should be transmitted in writing.

Employment First staff.

Original - Food Stamp office

Copy - EF file

Copy - Participant

Employment First Assessment

(EF-910)

[Link to EF-910](#)

To assist the Employment First unit in determining the participant's barriers to finding employment, and to obtain other useful information about the participant's employment situation.

Participant and Employment First case manager.

Special

The participant will usually complete this form unless they are unable to do so. The case manager must ensure that the form is filled out completely.

The case manager must insert appropriate comments, indicating action on the part of the EF unit, in the "staff use only" boxes that have a code letter in the column on the far right. The code is the first letter of the participant answer that requires a response by the case manager. Specifically, the codes are:

2. DK = DON'T KNOW
3. N = NO
4. Y = HOMELESS
5. A = AGES OF CHILDREN
6. Y = YES
7. Y = YES
8. Y = YES
9. Y = YES
10. (no case manager response required)
11. **Comment required if grade completed is less than 12 and GED box is not checked.**
12. Y = YES

For questions #13 - 18, no case manager response is required.

The "Staff Use Only" box must include the "Next Step for Participant," which is the component in which the client will be enrolled, or other probable case action.

A copy of this form must be included in the participant's case file, and will be monitored by state staff for completeness.

Employment First CFMS Codes

Function	Program	Funding Source	What Can It be Used For?
6150	F700	100% Federal Funds	Any allowable program expenditure, except workfare and participant reimbursement expenditures.
6350	F800	80/20% Employment First Operating	Any allowable program expenditure, except workfare and participant reimbursement expenditures. Do not use with Acct Code 65791
6250	F925	80/20% Workfare Operating	Any allowable workfare expenditure except participant reimbursement. Do not use with Acct Code 65791
6375	F800	80/20% Employment First Participant Reimbursement	Non-workfare participant reimbursement expenditures. (May be used to reimburse participants for expenditures incurred in looking for work. May also be used to pay for child care costs incurred while participating in EF. These are charged through the CHATS system, and the reimbursement rate is up to \$175/month per child over the age of 2, and up to \$200 /month per child under the age of 2.) *must only use ACCT code 65791
6275	F925	80/20% Workfare Participant Reimbursement	Workfare participant reimbursement expenditures. (May be used to reimburse workfare participants for expenditures incurred in looking for work and for work and for working at the workfare worksite.) *must only use ACCT code 65791
6300	F750	50/50% Employment First	Any allowable non-workfare expenditure. Enhanced funding may be used to cover the county share.
6200	F900	50/50% Workfare	Any allowable workfare expenditure. Enhanced funding may be used to cover the county match.
6380	F850	In-Kind Employment First	Any allowable non-workfare program expenditure, except participant reimbursement expenditures. Documentation of accrued in-kind must be on file before it can be expended. Documentation of in-kind accrued must be sent to the state office quarterly.
6400	F950	In-Kind Workfare	Any allowable workfare expenditure except participant reimbursement. Documentation of accrued in-kind must be on file before it can be expended. Documentation of in-kind accrued must be sent to the state office quarterly.

CFMS close is always the fifth working day of the month.

Basic Guidelines for Determining In-Kind Contributions

Possible Sources of In-Kind Match

Goods and services, such as space, furniture and staff from non-federal publics are possible sources of in-kind match. An example of a non-federal public would be a state, a county, a city, a town or a local school district. In order for these goods and/or services to be allowable, they must directly benefit the Employment First program **AND** not be paid with federal funds **AND** not be used to match any other federal funds.

Allowable Items For In-Kind Match

Employment First staff salaries – only the actual percentage of time they spend working on the EF program

Employment First staff bonuses

Direct and necessary overhead costs for the Employment First program, i.e. accounting

Office, meeting room and common areas based on the fair rental value in your community **AND** only the percentage of time utilized by Employment First or their participants

Rent, utilities, maintenance and janitorial

Furniture

Postage, supplies and printing

Staff development

Office, computer and audio/visual equipment

Telephone/computer/Internet charges

Staff travel

Workers' compensation insurance

Volunteers from a non-federal public provided it is during their regular work hours that are directly benefiting the Employment First program. Only salary may be claimed, no fringe or overhead.

How space is calculated:

Example 1

Conference room used for Employment First orientations twice a week paid for with county only funds

600 square feet X \$15 per square foot = \$9,000 per year
\$9,000/12 months = \$750 per month
\$750/20 working days per month = \$37.50 per day of use
Used twice per week for 26 days per quarter = \$975 per quarter

Example 2

Workspace of case manager assigned 100% of time to Employment First paid for with county only funds

150 square feet X \$15 per square foot = \$2,250 per year
\$2,250/4 = \$562.50 per quarter

How furniture and equipment is calculated:

Furniture and equipment in conference room used for Employment First orientations twice a week purchased with county only funds

5-8 foot conference tables @ \$37.25 per month = \$298 per month
\$298/20 working days per month = \$14.90 per day

30 armed chairs @ \$9.00 per month = \$270 per month
\$270/20 working days per month = \$13.50 per day

TV/VCR daily rental rate = \$50 per day

Daily rate total = \$78.40

The above conference room example would yield \$115.90 per day. If used twice weekly @ 26 times per quarter there would \$3,013.40 generated each quarter or \$12,053.60 per year.

Unallowable Sources of In-Kind Match

Goods or services from private for profit or private non-profit agencies are unallowable, even if used directly for the operation of the Employment First program. An example of a private for profit organization is Walmart. Goodwill is an example of a private non-profit agency.

Any of the following items, even if provided by a non-federal public without matching federal funds, are unallowable.

Unallowable Items For In-Kind Match

Office decorations, plants, pictures, motivational posters

Workfare work site supervisor's salary

Tools used by participants on their work site

Expenditures on non-EF staff

Supportive services for non-EF participants

Refreshments for participants or staff

Incentives to participants for reporting employment

Background checks on participants

Pre-placement physicals for workfare participants

Refrigerators, coffee pots, microwave ovens

MEMORANDUM

SUBJECT: Certification/Accountability of
Non-Federal/In-Kind Matching Share

GRANT OR
PROJECT: Employment First

EFFECTIVE DATE: April 1, 1987

The following are examples of the Certification Statement to be included with Grants or Projects when seeking reimbursement and certifying Matching Funds for Federal Reporting purposes.

Example #1:

"I hereby certify that the Non-Federal Matching Share of expenditures reported herein are correctly stated and have been made in accordance with the terms and conditions of the Grant and Federal and State Regulations."

Example #2:

"I hereby certify that Non-Federal Matching Share/In-Kind expenditures are as stated above and that records are being maintained for audit purposes. I also certify that none of these expenditures have been used to match other Federal funds."

The program project personnel are responsible for the accountability of Non-Federal/In-Kind Matching Share and for reporting to the Division of Accounting and Purchasing two (2) weeks before the required Financial Status Report is due for the Grant or Project. They are responsible for the documentation and reports to support the Non-Federal/In-Kind Matching Share if an audit is performed.

The Non-Federal/In-Kind Matching is required for Federal Reporting purposes and must be reported throughout the project period and not at the completion of the grant or project.

The Division of Accounting and Purchasing is responsible for the expenditures recorded in the Central Accounting System.