WTW 24-MONTH TIME CLOCK | INDIVIDUALS NOT SUBJECT TO THE WTW 24-MONTH TIME CLOCK | MONTHS THAT DO NOT COUNT TOWARD THE WTW 24-MONTH TIME CLOCK | COMPREHENSIVE DISCUSSION | TRANSITIONING EXISTING PARTICIPANTS | INDIVIDUALS WHO HAVE MORE THAN 24 MONTHS REMAINING ON THEIR CALWORKS 48-MONTH CLOCK: | WTW SANCTIONED INDIVIDUALS | NEW CALWORKS RECIPIENTS | FEDERAL PARTICIPATION REQUIREMENTS | DETERMINING FEDERAL TIME LIMITS FOR JOB SEARCH AND JOB READINESS (JSR) ACTIVITIES | DETERMING FEDERAL EXCUSED ABSENCES/ HOLIDAYS | PARTICIPATION IN EDUCATIONAL ACTIVITY | TWO-PARENT HOUSEHOLDS | PARTICIPANT NOTIFICATION REQUIREMENTS | WTW 24-MONTH TIME CLOCK TRACKING | CALWIN CASE COMMENTS | FORMS AND ATTACHMENTS | REFERENCES

WTW 24-Month Time Clock	Policy 207
Approved: **Signature on File**	Date: 4/13

PURPOSE

The purpose of this policy is to provide guidelines for implementation and ongoing application of the Welfare-to-Work (WTW) 24-Month Time Clock.
This policy includes general information about the WTW 24-Month Time Clock, how to count months toward the clock, how to exempt months from the clock, and how to transition individuals into the new WTW 24-Month Time Clock.
An informing notice “New Rules for CalWORKs Welfare-to-Work Activities” (CW 2205) was sent in November 2012 to inform all non-excluded WTW participants and WTW sanctioned participants of the WTW 24-Month Time Clock and new hourly participation requirements.

WTW 24-MONTH TIME CLOCK

Effective January 1, 2013, Senate Bill (SB) 1041 created a new WTW 24-Month Time Clock.
The WTW 24-Month Time Clock is a 24-month period in which individuals have flexibility to participate in the WTW activities and barrier removal services they need that are consistent with their Assessment and without core/non-core hourly requirements.
Two conditions must be met for the WTW 24-Month Time Clock to begin:
1. A comprehensive discussion with the participant; **and**
2. The participant makes a choice in regards to his/her WTW plan.
Note: Participants with 24 months or less remaining on their CalWORKs 48-month clock are exempt from this rule as their WTW 24-Month Time Clock began January 1, 2013.
Months that count toward the WTW 24-Month Time Clock are cumulative and not necessarily consecutive, during an individual’s lifetime on CalWORKs assistance.
The WTW 24-Month Time Clock does not affect a participant’s 48-month CalWORKs time limit; each clock ticks independently.
The number of hours individuals are required to participate in WTW activities has been aligned with federal hourly participation requirements as follows:
• 20 hours per week for single parents with a child under six years old,
• 30 hours per week for single parents without a child under six years old,
• 35 hours per week for two-parent families. Both parents in a two-parent family may contribute toward the weekly 35-hour requirement.
Refer to Policy 202 Work Participation Hours and Activities.

INDIVIDUALS NOT SUBJECT TO THE WTW 24-MONTH TIME CLOCK

The WTW 24-Month Time Clock does not apply to unaided adults who are not required to participate in WTW, including:
• Timed-out individuals,
• Drug and fleeing felons,
• Ineligible non-citizens,
• Non-needy caretaker relatives,
• Individuals receiving Supplemental Security Income (SSI).

MONTHS THAT DO NOT COUNT TOWARD THE WTW 24-MONTH TIME CLOCK

The WTW 24-Month Time Clock applies to all individuals who are required to participate in the WTW program.
Months prior to January 1, 2013 will not count toward the WTW 24-Month Time Clock. After January 1, 2013, any month in which the individual meets one of the following conditions does not count toward the WTW 24-Month Time Clock:

- WTW sanctioned,
- WTW exempt,
- Granted Good Cause for not participating in WTW,
- Participating in Orientation, Appraisal, Assessment, or is otherwise in the process of developing a WTW plan, or re-developing an existing WTW plan,
- Participating in Job Search activities as long as the activities are in the WTW plan and the hours account for at least 50 percent of the client's required participation hours,
- Eligible to Cal-Learn,
- Granted a Domestic Abuse Waiver (DAW) of the WTW 24-Month Time Clock,
- Has not been engaged after his/her temporary young child WTW exemption ended on 12/31/12,
- Meeting federal work participation requirements.

Worker Tool 7, WTW 24-Month Time Clock Exemption/Good Cause provides information regarding the WTW 24-Month Time Clock exemptions and good cause for not participating, and what impact each has on the CalWORKs 48-month clock.

COMPREHENSIVE DISCUSSION

A comprehensive discussion is one of the two conditions that must be met for the WTW 24-Month Time Clock to begin.
A comprehensive discussion between the CM/ISW and participant will cover:

- The new WTW 24-Month Time Clock and an explanation that the WTW 24-Month Time Clock will tick every month the participant does not meet federal work participation requirements,
- Flexibility the participant has during this 24-month period to participate in WTW activities he/she needs in accordance with his/her Assessment, including the elimination of core/non-core requirements and reduced hours for single parent families,
- The participant's ability to change participation in WTW in accordance with the new rules (hours/activities, or both),
- WTW exemptions, including the new young child exemption and how to request a WTW exemption. Refer to the CalWORKs Exemption Request Form CW 2186A,
- Months that do not count toward the WTW 24-Month Time Clock,
- Participation requirements after the 24-Month Time Clock is exhausted, including that in order to remain eligible for cash assistance, the participant will have to meet federal work participation requirements.

Refer to Attachment F063-41-330 Comprehensive Discussion Checklist

After the comprehensive discussion takes place, the participant will choose one of the following options in regards to his/her WTW plan:

- Continue in his/her existing WTW plan
  - The CM must narrate the participant's decision in CalWIN Case Comments
  - The WTW 24-Month Time Clock begins the first of the following month
  - A new WTW plan must be signed at the next scheduled appointment.

OR

- Change his/her existing plan
  - The participant signs a new WTW plan
  - The WTW 24-Month Time Clock begins the first of the following month after the WTW is signed.

Note: To best accommodate the participant's needs, CMs have the option to complete the comprehensive discussion either face- to-face or by phone. If the comprehensive discussion is conducted by phone, mail the WTW2 with form F063-41-333 WTW Plan Cover Letter to the participant for his/her signature.
For additional information about the WTW 2, including inability to contact participants for the comprehensive discussion, deadline for the return of the WTW2 and the development of a new WTW plan, please refer to Policy 211 WTW plan.
Narrate action taken in CalWIN Case Comments.

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TRANSITIONING EXISTING PARTICIPANTS

INDIVIDUALS WHO HAVE MORE THAN 24 MONTHS REMAINING ON THEIR CALWORKS 48-MONTH CLOCK:

Months will not count toward the WTW 24-Month Time Clock until the Case Manager (CM) contacts the participant and the two conditions which start the plan have been met.

Individuals who have 24 months or less remaining on their CalWORKs 48-month clock:

Participants with 24 months or less of CalWORKs eligibility will likely exhaust their time on aid prior to becoming subject to the post WTW 24-Month Time Clock federal work participation requirements. Therefore, all months on cash aid beginning **January 1, 2013**, will be counted toward the WTW 24-Month Time Clock, unless the individual meets one of the conditions for not ticking the WTW 24-Month Time Clock.

The CM will:

- Contact the participant, complete the comprehensive discussion, and
- Strongly encourage the individual to engage in WTW activities and take advantage of the new flexibility he/she has during the 24-month period by modifying his/her WTW plan.

All communication between the CM and the participant must be narrated in CalWIN Case Comments.

The comprehensive discussion and signing a new WTW plan must be completed at the next scheduled appointment.

Note: To best accommodate the participant's needs, CMs have the option to complete the comprehensive discussion either face- to-face or by phone. If the comprehensive discussion is conducted by phone, mail the WTW2 with form F063-41-333 WTW Plan Cover Letter to the participant for his/her signature.

For additional information about the WTW 2, including inability to contact participants for the comprehensive discussion, deadline for the return of the WTW2 and the development of a new WTW plan, please refer to Policy 211 WTW plan.

Narrate action taken in CalWIN Case Comments.

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WTW SANCTIONED INDIVIDUALS

Individuals who are in a WTW sanction may be meeting participation requirements under the new rules.

Individuals who are currently WTW sanctioned and have reported earnings

OSW

Upon discovery that a sanctioned individual has reported earnings the OSW must complete a WTW referral utilizing form F063-41-70 CalWORKs Communication Document .

CM

The CM will contact the participant to:

• Discuss changes to the WTW program, including the new WTW 24-Month Time Clock, new hourly requirements and the elimination of core/non-core requirements (comprehensive discussion).

• Request, if needed, additional information that may help to determine the participant's weekly hours of participation.

• Calculate hours to determine if the participant meets the new hourly participation requirements.

Calculating hours of participation:

The following calculations are to be used only for the purposes of determining hours of participation for WTW sanctioned individuals:

• If the hours and earnings reported on the QR7 meet new requirements and verification is provided, accept this documentation as verification of participation.

• If verification reflects the hourly wage and gross earnings, calculate hours by dividing the gross earnings by the hourly wage.

• If verification only reflects gross earnings, determine hours of participation by dividing gross earnings by the state minimum wage ($8.00 per hour).

I**f meeting participation in the current month (based on calculation above)**:

• The sanction is lifted retroactively to January 1, 2013 or the date participation was met, whichever is later.

• Aid is restored for the individual only for the months in which participation was met.

• Refer to WTW Sanction Case Instructions and CalWIN Entries when lifting a sanction for consecutive months in which the client is meeting the new participation requirements effective 1/1/2013 of the date participation was met.

• The CalWORKs 48-Month Clock ticks for all months in which the WTW sanction is lifted and the participant is added back to the Assistance Unit.

• A sanction curing plan is not signed.

• A new WTW plan must be signed. If the participant refuses or fails to sign a new WTW plan he/she is subject to the WTW sanction process. Refer to Policy 240 Good Cause/Compliance/Sanction.

• The WTW 24-Month Time Clock starts the first of the month after the new WTW plan is signed.

• A Notice of Action (M44-209 CW/RCA Change-Person Added To HH/AU) created by CalWIN must be sent to the participant to inform him/her of restoration of aid and that months restored will be counted toward his/her CalWORKs 48-month clock.

If not meeting participation in the current month (based on calculation above):

• The CM determines if participation was met in any months after **January 1, 2013**.

• Aid is restored for the individual only for the months in which participation was met. Because the individual is not currently meeting participation, do not lift the WTW sanction.

Refer to WTW Sanction Case Instructions and CalWIN Entries when restoring aid for a prior month in which the client met participation requirements and is currently not meeting required participation hours.

• The CalWORKs 48-Month Time Clock ticks for all months the participant was added back to the Assistance Unit.

• A Notice of Action (M44-209 CW/RCA Change-Person Added To HH/AU) created by CalWIN must be sent to the participant to inform him/her of restoration of aid and that months restored will be counted toward his/her CalWORKs 48-month clock.

• Encourage the individual to cure his/her sanction (through the normal curing sanction process) and sign a WTW plan. Refer to Policies 240 Good Cause/Compliance/Sanction and 211 WTW Plan.

Communication between the OSW and CM is essential to ensure the new WTW rules have been properly applied to WTW sanctioned individuals.

Sanctioned individuals participating in any of the activities allowed with the new WTW 24-Month Time Clock as well as those verified through earned income, will need to be evaluated prior to or during the next RRR to determine if participation was met effective January 2013 or the date participation began whichever is later.

Clients who have a WTW sanction cured retroactively as a result of meeting the new WTW requirements will receive additional months of supportive services, if needed, after they have reached their CalWORKs 48-month time limit. These months must be tracked utilizing the attached form F063-41-335 Sanctioned Months Restored Retroactively Tracking Form.

NEW CALWORKS RECIPIENTS

Months do not count toward the WTW 24-Month Time Clock for individuals who are approved for CalWORKs on or after January 1, 2013, until a comprehensive discussion takes place and a WTW plan is signed. Once the WTW plan is signed, the WTW 24-Month Time Clock begins to tick the first of the following month. Supportive services are to be made available to every individual in order to participate in WTW activities.
Initial Services Worker (ISW)
For employed individuals who are approved for CalWORKs on or after January 1, 2013, the ISW is required to develop and sign a WTW plan if the employed individual meets federal participation requirements. Months will not count toward the WTW 24-Month Time Clock; however, the ISW is required to have a comprehensive discussion with individuals before the WTW plan is signed.
For comprehensive discussion requirements, refer to the Comprehensive Discussion section of this policy.

FEDERAL PARTICIPATION REQUIREMENTS

Months in which an individual meets federal participation requirements do not count toward the WTW 24-Month Time Clock. To determine if the participant met federal work participation for purposes of not counting months towards the WTW 24-Month Time Clock, the following conditions must be met:

- The participant's activities meet federal standards. Refer to Attachment A
- The participant has not exceeded the federal limitations on Vocational Education (lifetime maximum of 12 months) and Job Search and Job Readiness activities (4-6 weeks in the preceding 12-month period).
- The participant meets federal hours and core/non-core requirements:

  Participation of 20 hours average per week, of which all 20 hours must be in core activities, for a single parent with a child under 6 years old

  Participation of 30 hours average per week, of which 20 hours must be in core activities, for a single parent without a child under 6 years old

  Participation of 35 hours average per week, of which 30 hours must be in core activities, for a two-parent family.

  Refer to Policy 202 Work Participation Hours and Activities for additional information regarding core/non-core activities.

Note: To calculate the average number of weekly participation hours in federal activities, the total actual participation hours in the month are divided by 4.33. Refer to Policy 203 Work Participation – Federal Review Process

DETERMINING FEDERAL TIME LIMITS FOR JOB SEARCH AND JOB READINESS (JSR) ACTIVITIES

Participation in JSR activities is limited to no more than four consecutive weeks, and up to six weeks total in the preceding 12-month period. The six-week limit is converted to hours based on the individual's federal work participation requirement:

- 120 hours for a single custodial parent with a child under six years old, (1 week = 20 hours; 6 weeks = 120 hours),
- 180 hours for all other families, including two-parent families (1 week = 30 hours; 6 weeks = 180 hours).

Actual participation hours are deducted until the appropriate limit (120/180 hours) is exhausted.
The six-week limit applies to the preceding 12-month period. This is defined as the current month and the eleven previous months.
After four consecutive weeks, there must be a break of at least seven consecutive days before additional JSR hours can be counted. Hours in every fifth consecutive week of JSR are deducted from the six-week limit, but they do not count toward the participation requirement.
Activities that can be counted as participation in JSR include, but are not limited to:

- Substance abuse and mental health treatment, and other rehabilitation activities.
- Domestic abuse services that address barriers to employment (not Domestic Abuse Waiver).
- Orientation, Appraisal and Assessment.
- Online tasks such as job searching, job applications and resume preparation, interviewing skills, and life skills training.

Refer to Attachment A for more information about JSR.
Counting JSR hours toward the federal limit
Example:
An individual with a 20-hour requirement participates seven hours per week in JSR and 13 hours per week in Vocational Education for a total of four weeks. The 28 hours of JSR (seven hours per week for four weeks) are deducted from the participant's 120 hour limit leaving a balance of 92 available hours.

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DETERMING FEDERAL EXCUSED ABSENCES/ HOLIDAYS

Excused absences are specific situations in unpaid activities, where scheduled hours can be reported as actual hours even though the individual did not participate. Excused absences can be allowed for semester breaks, school appointments, medical appointments for a parent of a child, caseworker appointments, breakdown in transportation and/or child care arrangements and other similar situations.

In addition, the following state holidays are allowed as excused absences:

1. New Year's Day
2. Martin Luther King Jr. Day
3. President's Day (Washington's Birthday)
4. Memorial Day
5. Independence Day
6. Labor Day
7. Veteran's Day
8. Thanksgiving Day
9. Day after Thanksgiving Day
10. Christmas Day

Excluding the ten allowable state holidays, excused absences are limited to 80 hours in any 12-month period, with no more than 16 hours occurring in a single month during the preceding 12 month period. In order to count an excused absence as actual countable hours of participation, the individual must have been scheduled to participate in a countable work activity for the period of the absence that is reported as participation. Documentation of the reason the absence was excused and verification of all excused absences must be maintained in the case file.

Refer to Federal Time Limited Activities Worksheet F063-41-329 to record JSR hours and Holidays and Excused Absences.

PARTICIPATION IN EDUCATIONAL ACTIVITY

Vocational Education can count as a federal core activity for a lifetime maximum of 12 months, which stops the WTW 24-Month Time Clock for up to one year. For federal participation, SIPs are included under Vocational Education.

After 12 months, the participant may continue in his/her educational activity under Education Directly Related to Employment or Job Skills Training Directly Related to Employment utilizing the WTW 24-Month Time Clock flexibility. After the 12-month lifetime limit of participation in Vocational Education and the WTW 24-Month Time Clock are exhausted, any additional approved Vocational Education is counted as a non-core activity.

Refer to Policy 223 Vocational Training

Participants who have used months toward the 12-month lifetime limit, **do not** get a new 12-month period for Vocational Education beginning January 1, 2013.

Example:

A single mom has been receiving CalWORKs and participating in a SIP activity since 12/2011. As a result she has used her 12-month Vocational Education lifetime limit (federal participation). She can continue participating in her SIP activity under the WTW 24-Month Time Clock for 24 additional months. After mom's WTW 24-Month Time Clock is exhausted, any additional Vocational Education is counted as a non-core activity.

TWO-PARENT HOUSEHOLDS

Each parent has an individual WTW 24-Month Time Clock. An individual's clock does not tick for any month in which a clock-stopping condition is met.

The WTW 24-Month Time Clock stops for both parents if the family meets federal work participation requirements.

If the family does not meet federal work participation requirements, the WTW 24-Month Time Clock ticks for both parents. However, if one of the parents meets a WTW 24-Month Time Clock-stopping condition in that month (other than meeting federal work participation), the clock will not tick for that parent only.

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Example 1: Both parents participating (sharing hours)
Family meets federal requirement:
Parent one participates 18 hours per week in employment (federal core); parent two participates 17 hours per week in Vocational Education within the 12 month lifetime limit (federal core). Combined total hours of participation are 35 (all core).
Both parents participate and meet the family's federal requirement. Both clocks **do not** tick.
Family does not meet federal requirements:
Parent one participates 18 hours per week in employment (federal core); parent two participates 17 hours per week in job skills training (federal non-core). Hours of participation are 18 core hours and 17 non-core hours with a combined total of 35 hours per week.
Both parents participate but do not meet federal requirement of 30 core hours per week. The clocks tick for both parents.
Example 2: One parent participating and one parent is excused (SMP)
Family meets federal requirements
Parent one participates 35 hours per week in employment (federal core); parent two is excused (SMP). Total hours of participation are 35 (all core). One parent meets federal requirements for the family. Both clocks **do not** tick.
Example 3: One parent participating and one parent is excused (SMP)
Family does not meet federal requirements
Parent one participates 20 hours per week in employment (federal core) and 15 hours per week in job skills training (federal non-core); parent two is excused (SMP). Total hours of participation are 35 but only 20 hours are core. **Clocks tick** for both parents.
Example 4: One parent participating and one parent is exempt
Family does not meet federal requirements
Parent one participates 20 hours per week in employment (federal core) and 15 hours per week in job skills training (federal non-core); parent two is exempt from WTW participation because he/she meets a clock-stopping condition. Total hours of participation are 35 but only 20 hours are core. The participating parent does not meet federal requirements therefore, his/her **clock ticks**. The clock **does not** tick for the exempt parent.
Example 5: Both parents participating (one parent exempt)
Family meets federal requirements
Parent one participates 30 hours per week in employment (federal core); parent two participates 5 hours per week in a GED program as an exempt volunteer. Total hours of participation are 30 core and 5 non-core hours with a total of 35 hours. Both clocks **do not** tick.

PARTICIPANT NOTIFICATION REQUIREMENTS

Participants must receive an Informing Notice CW 2208 "Your WTW 24-Month Time Clock" at the following intervals:

- At application
- At annual redetermination

Copies of the completed CW 2208 must be filed in OnBase in the participant's Employment Services case in the WTW 24-Month Clock acco, and in the participant's CalWORKs case in the Admin acco.
Communication between ISW, OSW and/or CM is essential to ensure the CW 2208 is completed correctly.
A Notice of Action must be provided at least once between months 18 and 21 on the WTW 24-Month Time Clock. A final Notice of Action must be sent to the participant prior to the end of the 24th month notifying him/her that his/her WTW 24-Month Time Clock has been exhausted and that the family's grant will be reduced if the family is not meeting federal participation requirements. (NOA pending from the State)

WTW 24-MONTH TIME CLOCK TRACKING

CalWIN will be updated to automate tracking of the WTW 24-Month Time Clock. Until automation occurs, CMs will use form F063-41-328 WTW 24-Month Tracking to manually track the months on the WTW 24-Month Time Clock for all individuals.
This form must be filed in OnBase in the participant's Employment Services case in the WTW 24-Month Clock acco.

CALWIN CASE COMMENTS

CalWIN case comments must be updated to reflect information obtained during contact with the client and actions taken as a result of the comprehensive discussion.

CCSA

FORMS AND ATTACHMENTS

1. CW 2205 New Rules for CalWORKs WTW Activities
2. Worker Tool 7 WTW 24-Month Time Clock Exemption/Good Cause
3. CalWORKs Exemption Request Form CW 2186A
4. F063-41-330 Comprehensive Discussion Checklist
5. F063-41-333 WTW Plan Cover Letter
6. F063-41-70 CalWORKs Communication Document
7. WTW Sanction Case Instructions and CalWIN Entries
8. F063-41-335 Sanctioned Months Restored Retroactively Tracking Form
9. Attachment A: WTW Activities That Meet Federal Standards
10. F063-41-329 Federal Time Limited Activities Worksheet
11. CW2208 Your WTW 24-Month Time Clock
12. F063-41-328 WTW 24-Month Tracking

REFERENCES

ACL 12-53E Revised WTW 24-Month Time Clock Informing Notice (CW 2205)
ACL 12-67 New WTW 24-Month Time Clock
ACL 12-69 Alignment of CalWORKs Hourly Work Participation Requirements to TANF Requirements
ACL 13-12 New CalWORKs WTW 24-Month Time Clock Informing Notice (CW 2208)
Policy 202 Work Participation Hours and Activities
Policy 203 Work Participation Federal Review Process
Policy 211 Welfare to Work Plan
Policy 240 Good Cause/Compliance/Sanction

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