

STATE OF COLORADO



Colorado Department of Human Services

people who help people

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August 15, 2012

Philip Fraley, Acting Regional Director
Supplemental Nutrition Assistance Program
USDA, FNS, MPRO
1244 Speer Blvd., Suite 903
Denver, CO 80204-3585

Extended Benefits Trigger Waiver Request

Dear Mr. Fraley,

This letter accompanies the updates to the Supplemental Nutrition Assistance Program - Employment and Training Plan for the State of Colorado for federal year 2013. At this time Colorado also wishes to request the statewide waiver of the ABAWD work requirements under the guidance that provides that states that meet the Department of Labor and Employment extended unemployment insurance benefits (EB) criteria can qualify for a 12-month statewide ABAWD waiver. The Department of Labor's Emergency Unemployment Compensation Trigger Notice 2011-52, effective January 8, 2012, indicates Colorado met the emergency unemployment compensation.

Colorado intends to continue operating the ABAWD program in Arapahoe, Denver, and El Paso counties, imposing the ABAWD work requirement in those counties. We are applying once again to be a pledge state and will provide an opportunity to every at-risk ABAWD to meet the work requirement.

If you have any questions regarding this request, please contact me at 303-866-2629

Sincerely,

A handwritten signature in black ink that reads "Kathleen Mahoney".

Kathleen Mahoney, Manager
Colorado SNAP E&T Program
Colorado Department of Human Services



EMPLOYMENT AND TRAINING PROGRAM PLAN

October 1, 2012 through September 30, 2013

PART I:

SUMMARY OF STATE SUPPLEMENTAL NUTRITION ASSISTANCE

EMPLOYMENT AND TRAINING PROGRAM

A. Abstract of the State E&T Program

In Colorado, the “Employment First” Program includes both the Supplemental Nutrition Assistance E&T program required by 7CFR273.7 (f) and the optional workfare program operated under the provisions of 7CFR273.7 (m). At the state level, “Employment First” is co-located with the Supplemental Nutrition Assistance Program (SNAP) within the Colorado Department of Human Services.

In Colorado, as in 10 other states nationwide, social services programs are state-supervised and county administered. The services are delivered by local agencies but the State provides oversight and monitoring. Colorado is a “Pledge State” and guarantees every at-risk Able-Bodied Adult Without Dependents (ABAWD) a qualifying education, training, or workfare opportunity to meet the work requirement through the Colorado Employment First (EF) Program. In FFY 2011, 2012, and 2013, Colorado applied for the statewide ABAWD waiver based on the high unemployment rate, but chose to continue to operate an ABAWD program in the three largest counties.

The State allocates E&T grant funds to the counties and establishes clear statewide parameters, including the directive that all mandatory work registrants be referred to EF, where they receive information, referrals, and assistance with job search and employability until they find a job. Each county social services agency chooses their Employment First service provider. The state provides a detailed program structure, staff training, tools to use in designing and delivering services, and on-going technical assistance, including a daily phone help desk. Information is also provided to counties through the state portal:

<https://my-cdhs.state.co.us/portal/group/EmploymentFirst>

Colorado counties experienced a dramatic increase in food assistance applicants with the economic downturn in 2009; this subsequently increased referrals to the Employment First program. The greater number of able-bodied food assistance recipients nationwide was not accompanied by an increase in the national allocation for the SNAP E&T Program. However, Colorado chose to maintain, as much as possible, the number of participating counties and the level of service. The State requested and received additional funds unspent by other states, and used these funds to provide job search materials and to enhance county efforts to reorganize their service delivery systems to serve much larger numbers of participants, as well as to reinstate a more robust job seeking skills competency system.

The ABAWD Pledge funds were used to support efforts to refine the management and integrity of the ABAWD tracking system and to redesign the ABAWD 30 day workfare job search to include instruction in job seeking skills on top of a workfare assignment.

In 2013, Colorado will have 29 counties operating a SNAP E&T Program, having added two medium counties to the total. These counties are Chaffee and Rio Grande. The number of counties delivering services through their social services agency totals seventeen (17). Eleven (11) counties contract with their Workforce Centers for service delivery including seven (7) of the ten (10) largest counties; two (2) medium and two (2) small Community Based Organizations (CBO) operate the Workforce Center in three (3) of the eleven counties. One county contracts with a community-based organization that is not part of the local Workforce Center. Regardless of which agency delivers the E&T services, all use CBMS to record and track E&T activities. Eligibility workers and Employment First workers data-enter information on three common screens: (1) employment, (2) case comments, and (3) non-compliance. The programs share "view" access so they can read information on CBMS that pertains to mutual clients.

1. Program Changes:

Colorado has introduced a new system for handling greater numbers of people in a more efficient way. The system entails much more group work for counties in which the caseload exceeds 150 cases per case manager. All participants, ABAWD and non-ABAWD alike, are required to attend orientation within 14 days, attend a "competency in job seeking skills" class within a week, and do 8 hours of workfare in the following week. After the first 30 days, participants are assigned to permanent workfare sites and attend monthly support groups where they turn in their time sheets. The biggest hurdle to smooth implementation of this design is the need for rooms in which to hold group meetings. Most counties struggle to provide sufficient space for the number of group activities going on at a given time. The State will be working with counties to identify and secure additional space, as well as increasing the number of workfare worksites in order to handle more workfare placements.

In program year 2012, Colorado created a state-level specialist position charged with creating resources and linkages to more effectively serve the ex-offender population in SNAP E&T. Colorado used reallocated funds to provide training to an existing state E&T position to link the E&T program to existing community resources targeted at ex-offenders, a group that is heavily represented among the SNAP E&T participants. The state E&T unit also created specialized training materials, information on local organizations providing supportive services for ex-offenders, and guidance for local Employment First workers on identifying "felon-friendly" workfare worksites and employers. Additionally, Colorado created "re-entry specialists" within local EF units and will provide on-going training and technical assistance to these workers to keep the information on "re-entry" resources current.

Reallocated funds were also used to create a bank of job seeking skills training materials and to fund facilitation training for local case managers. Colorado continues to emphasize the importance of the job seeking skills competencies for each EF participant and skilled facilitation enhances the learning experience for participants, resulting in more documented positive outcomes.

The Colorado Department of Human Services, Office of Economic Security (OEC), has established an Employment Work Group that brings together the four programs within OEC that have employment as one of their target outcomes. The SNAP E&T program (Employment First) is included in this work group along with CO Works, Vocational Rehabilitation, and the Colorado Refugee Services program. The intent of the work group is to coordinate training and information sharing within CDHS and with employment and training providers in other state departments, as well as in local communities.

The State SNAP E&T program continues to work on identifying and disseminating new software applications to utilize CBMS reports more efficiently to help with case management. Employment First is also moving toward utilizing the internet to disseminate training materials and information to local EF staff and eventually to program participants. New tools have been developed to measure both process and outcomes and will be used to set performance goals and standards and reward those counties showing success in meeting Employment First performance expectations.

Colorado utilized reallocation dollars to develop and deliver training for local Employment First workers, including case management training, job seeking competency skills training, reports training, and supervisor training. We are renewing our efforts to coordinate and work in concert with Food Assistance eligibility, focusing on areas in CBMS that cause the most confusion for both eligibility and Employment First workers relative to clients they have in common. Reallocated funds were used to provide implementation training for the revitalization of the liaison program, which creates a local team of Food Assistance and Employment First staff to trouble-shoot and problem-solve shared case actions as noted below.

- We continue to seek a way to create an automated appointment list from CBMS. Denver County constructed such a process within their county "workload management system" and find it increases efficiency and accuracy in tracking individuals referred for EF services.
- We have increased the weight we give to case comments in our case file review process and remind workers during technical assistance calls that they must case comment all actions they are taking on a case.
- Decision tables, rather than individual eligibility workers, now determine who is an ABAWD or non-ABAWD as well as who is mandatory or exempt from participation in EF, based on federal exemption criteria. This requires constant communication between eligibility and Employment First to insure that information is entered correctly on the Food Assistance side to exempt participants. It also requires constant vigilance to insure that exempt ABAWDs are coded correctly so that they do not lose eligibility.

- Employment First cases are automatically created on-line, based on a person's work registration status. This means that CBMS creates a case for a mandatory or ABAWD work registrant even if the person does not receive a referral to Employment First from the eligibility worker. This necessitated the creation of a twice-monthly case list that highlights CBMS cases without a scheduled appointment so that EF appointment letters are mailed to the mandatory individual immediately.
- There is an automated batch process that runs each month to determine which ABAWDs have not met the monthly work requirement. For those who received a full month of benefits, and who did not meet the work requirement, the system records the month and year as one of their 3 months in 36 months where they can receive benefits without meeting the work requirement.
- When an ABAWD uses up their 3 eligible months, the system automatically creates a non-compliance record and stops benefits for the 4th month.
- CBMS identifies when an ABAWD qualifies for the 3 Regain months required by law and posts the Regain months.
- CBMS creates a non-compliance record when the ABAWD has received benefits for their 3 Regain months without meeting the work requirement and denies benefits for the 4th month.

Some of the problems we are still addressing are: (1) making sure that the eligibility worker gives each mandatory work registrant a hard copy appointment letter for an EF orientation; (2) insuring that information is entered as required for CBMS to recognize exempt work registrants; (3) providing sufficient case comments to explain what actions have been taken in working with program participants; (4) creating tickler files so no participant falls through the cracks.

Participant Reimbursement

When the 2002 Farm Bill removed the \$25 per person per month cap on federal matching funds, counties were given the flexibility to buy bus passes and other needed job search assistance without worrying about exceeding the cap. Limited matching state funds have been appropriated by the legislature (an amount unchanged in 12 years) and counties are setting aside additional county-only funds as match to increase funds for participant reimbursement.

Each county creates their own reimbursement policy addressing when they use allowances and when they do reimbursements, as well as what the limits are. All participant reimbursement is for costs incurred as a result of participating in a required activity. Most expenditures for participant reimbursement and allowances are for transportation related costs in the form of bus passes or gas vouchers. There is no attempt to align E&T reimbursement policy with TANF policy.

With the upsurge in referrals to the EF program, counties experienced an equivalent and dramatic increase in the need for participant supportive services for transportation. Consequently, most counties instituted allowance programs that limit assistance to the minimum amount calculated as necessary to make the trips required to participate in either training or workfare.

2. ABAWD Population:

The mandatory ABAWD population is expected to remain fairly stable in 2013 even though Colorado is initially only going to apply the ABAWD requirements in the three largest counties, which contain approximately 20% of the total ABAWD caseload. In 2013, we expect 2,000 ABAWDs at any given point in time to be receiving benefits and subject to the ABAWD work requirements. This represents approximately 732 new individuals and 1,268 on-going each month. There is more turnover in the mandatory ABAWD population due to the participation requirements and the 3-month certification period.

The balance of the counties will be waiving the ABAWD work requirements under a statewide waiver based on federal regulations at 7 CFR 273.24(f)(2), that allow a State to qualify for a 12-month statewide ABAWD waiver if the Department of Labor's Unemployment Insurance Service determines it meets the criteria for extended unemployment benefits. The number of ABAWDs to be covered by waivers is estimated at 8,177 each month and this number represents a fairly stable group of individuals from month to month with about a 70% turnover annually.

In 2013 we expect to use the 15% ABAWD exemption to exempt ABAWDs who are not job ready but lack the medical verification that would exempt them or who are violent or dangerous. The 15% is also used for situations where an individual is temporarily not job ready. A count is taken monthly of individuals 15% exempted for the month. This number is reported on the FNS-583.

ABAWDs and non-ABAWDs share significant barriers which may include: (1) no high school diploma, (2) no significant work history, (3) felony convictions, (4) substance abuse, (5) mental and physical health problems, (6) housing problems, and (7) transportation problems.

The barriers that seem proportionately higher in the ABAWD population are: (1) recent prison time, making service to them more complicated, especially if they are sex-offenders, (2) lack of a permanent address. ABAWDs, because they are in households without children, are more transient and move in and out of geographic areas more frequently, (3) health problems. Lacking health coverage, physical problems go uncorrected and result in frequent emergency medical procedures. Substance abuse usually accompanies other health problems.

To address the transitory nature of both the ABAWD and non-ABAWD work registrant population, our program is designed to get participants started in a program component within two weeks of being determined mandatory. To the extent possible, we expect the eligibility worker to give them a referral to Employment First during the meeting in which they are determined mandatory to the program. After that initial referral, the Employment First case managers are required to give the participant their next appointment letter at the end of each appointment, rather than mailing them. This deals with the often temporary nature of their housing, reduces the costs of postage, and saves the time required to handle returned mail.

3. Additional Allocation for “Pledge” States

Colorado requests continuation of its status as a Pledge State and commits to offering a qualifying activity to all at-risk ABAWD applicants and recipients. Initially this will be ABAWDs in the three largest counties, Arapahoe, Denver, and El Paso. A qualifying activity will be provided through the Employment First Program for all ABAWDs who report for services. It costs Colorado approximately \$2.5 million to fulfill its pledge.

All counties not under an ABAWD waiver must operate an E&T program that provides activities that meet the work requirement for ABAWDs, and offer every ABAWD the opportunity to participate monthly. On-site program reviews are done each year and CBMS reports allow continual state oversight of ABAWD service.

Management controls are built into CBMS to help ABAWDs maintain their eligibility for benefits. Every month, CBMS generates a list by county, of ABAWDs who have used 1, 2, or 3 of their eligible months. These lists allow local supervisors and the State office to insure that individuals are being scheduled for activities to meet the work requirement. Additional monthly and every-other week reports have been created to help identify and schedule ABAWDs for service as soon as possible. These reports include: a list by county of individuals who will turn 18 during the month and become ABAWDs; and a weekly report of individuals receiving Food Assistance and identified as work registered mandatory ABAWDs. The report allows the Employment First units to identify ABAWDs who do not have a current open E&T case and contact them with a scheduled appointment.

In CBMS, EF cases are created at the same time as the Food Assistance case based on decision table results, which also determine work registration status and categorize each Food Assistance applicant or recipient as an ABAWD or non-ABAWD. CBMS will not allow a case manager to place an ABAWD in a component that does not meet the work requirement. EF case managers are required to verify attendance for ABAWDs monthly and to record participation hours in CBMS. There is a monthly report of individuals enrolled in components who have not had hours entered for their case. If the ABAWD is not fulfilling the work requirement by the middle of their third month, an automatic process will send a Notice of Adverse Action to the client and they will be disqualified at the end of the month if hours are not submitted.

Colorado operates a broad-based program intended to serve every eligible work registrant. Over the past 20 years the state E&T program has built up a network of resources and a service delivery system capable of serving a diverse population of participants in a variety of ways. The system is elastic, and multi-faceted, relying on both EF case managers and Workforce center employment and training resources to help the ABAWD meet the participation requirements.

The ABAWD population served in the 3 largest counties is expected to total approximately 12,200 individuals referred for service during FFY 13. They tend to be a transient group whose labor market participation is intermittent and temporary. They work often but do not maintain employment and lack job benefits such as health insurance and/or disability coverage. They do not have the resources to support themselves while in training or education so they seldom take advantage of chances to improve their employability.

ABAWDs need access to employers, education in changing self-defeating job search behaviors, and support and encouragement to look for better jobs. The primary component used to meet the work requirement is workfare. However, all program components are open to ABAWDs and include the necessary elements to meet the work requirement. Job search and job seeking skills training are provided as part of participation in workfare.

Program Components for ABAWDs

Workfare

- Requires a participant, each month, to work a specified number of hours (not to exceed the number resulting from the household monthly allotment divided by the State minimum wage) on a public or private non-profit worksite in order to satisfy the ABAWD work requirement.
- In general, individuals displaying any of the following characteristics will not be placed on a worksite, but assigned to another component.
 - Physical or mental limitations that would put them or the worksite at risk, or previous history of worker's compensation claims.
 - Attitudinal or substance abuse issues.
 - Assessment indicating the participant would be better served by another component such as education, Voc. Rehab, or WIA.

Workfare 30-Day Job Search

- In the 30 day period commencing with referral to EF, individuals are required, at a minimum, to: (1) attend an orientation/assessment meeting where they may also perform a workfare screening activity, (2) attend job seeking skills training of 4-6 hours and (3) perform 8 hours of workfare. Additional requirements such as job contacts may be included. The participant will be placed on a permanent workfare site at the end of the 30 days,

All Other Components

ABAWDs must participate at least 20 hours per week. Nine (9) of the 20 hours may be made up of job contacts. Components (excluding Workfare 30-Day Job Search) can be combined in order to meet the ABAWD work requirement.

- English as a Second Language
- Literacy
- Basic Skills/Adult Basic Education
- GED
- Employability Education
- Working
- Post Secondary Education
- WIA
- Vocational Training
- Business
- Vocational Rehabilitation

4. Program Components for non-ABAWDs

Program components for non-ABAWDs are the same as for ABAWDs except for the requirement that participation in non-workfare employment or training activities equal 80 hours a month. Additionally, non-ABAWDs can participate in the job seeking skills overview component as their only component assignment.

Workfare

Workfare 30-Day Job Search

All other components share a common participation requirement

Non-ABAWDs are required to participate at least 3 hours per week but not more than 120 hours per month in any of the components listed.

- Job Seeking Skills Overview (Does not meet the ABAWD work requirement; may be offered to ABAWDs in addition to another component activity that meets the work requirement.)
- English as a Second Language
- Basic Skills/Adult Basic Education/Literacy

- GED
- Employability Education
- Working
- Post Secondary Education
- WIA
- Vocational Training
- Business
- Vocational Rehabilitation

Counties have been encouraged to improve the quality of job seeking skills assistance that participants receive while enrolled in any Employment First component, including workfare. As a timesaver in working with higher caseloads, we have provided training on how to use groups as the instructional vehicle for job seeking skills training, as well as a way to maintain connection with participants, instead of individual appointments.

5. Sequencing of Components:

All participants begin with orientation and assessment, followed in most counties by a system to test an individual's ability to follow directions and complete a one-hour work assignment at the Employment First office as a first step in the workfare component. They are then assigned to complete a series of job search competencies, which may be done individually or as part of a 4-6 hour job seeking skills class. They are then assigned to an 8-hour workfare assignment to finish out the 30-day workfare job search component and placed on a permanent workfare site. Unless they exhibit problematic behaviors, they are considered a good workfare candidate and placed on a permanent workfare site within 25 days of the completion of this assignment. This is true for all cases, unless there are compelling reasons for assignment to another educational or training component. Such reasons cannot include lack of a worksite, but must be based on specific needs or barriers of the participant.

6. Other Employment Programs:

Relationships with other employment and training programs include the following: Optional Workfare, Colorado Department of Labor and Employment, Workforce Development Centers, including Workforce Investment Act (WIA); Community College and Occupational Education system (CCOES); Colorado Works Program (TANF); Community Based Organizations (CBOs); and Vocational Rehabilitation.

The Employment First program coordinates with the other employment and training programs listed above in a variety of ways, depending on local program design and operation. Very often the E&T/EF program is co-located with other employment and training providers in the Workforce Development Centers. E&T funds in Colorado are used to insure services to Food Assistance applicants and recipients not being served by another employment and training agency. This is done by providing services directly or by monitoring client participation in activities delivered by other agencies.

Workforce Development Centers may - (1) contract with the county to operate the program; (2) function as a partner under a non-financial agreement to provide employment information or client job referrals.

WIA may - (1) provide access to training under non-financial agreements; (2) provide educational training and job search assistance under non-financial agreements.

CCOES may - (1) provide space and equipment for job search activities and training; (2) provide tuition waivers for vocational or educational training including ABE or GED preparation, (3) provide ABE/GED instruction targeted for only E&T participants.

Community Based Organizations may- (1) contract with the county to operate the program, (2) provide various kinds of specialized job search assistance or supportive services under financial and non-financial agreements.

Vocational Rehabilitation - under non-financial agreements, provides a broad range of assistance to E&T participants who qualify for VR services.

Colorado Works Program (TANF) may - (1) share educational training services; (2) refer clients to E&T for training or workfare.

7. Workforce Development System:

In most cases, the large counties' E&T Programs are involved in the Workforce Development System through co-location with the primary employment, education, and training providers. In most medium and small counties, the Workforce Development System is not available or is not large enough to accommodate co-location so coordination occurs through referral and cooperative agreements.

Most workforce providers are not prepared to monitor E&T clients for compliance with participation requirements or to provide the level of service needed to assist ABAWDs in meeting the work requirement, as Colorado has pledged to do. The Workforce Centers can provide job search assistance or job seeking skills classes on a drop-in basis, as they would for the general population, but few would be able to provide component activities that meet the 80-hour per month ABAWD work requirement. The options available through the Workforce Center do not include workfare.

The local E&T programs are working within the Workforce Development System framework to combine or enhance services whenever and wherever possible. Typically, the decision is made to maintain, within the Workforce Center, a separate E&T unit responsible for providing and tracking all services to the E&T population.

8. Outcome Data

Outcome data for July 1, 2011 through June 30, 2012 is shown below.

Total for 12 Months

Total Cases Handled (Duplicate Count)	171,399
Full Time Jobs	13,877
Full Time Avg. Wage	\$11.71
Part Time Jobs	9,544
Sanctions	22,539

PART II

PROGRAM PARTICIPATION AND EXEMPTIONS

A. Work Registrant Population

1. Number of Work Registrants

- a) The number of work registrants expected on October 1, 2012 in Colorado is 49,970.
- b) The anticipated number of new work registrants to be added between October 1, 2012 and September 30, 2013 is 93,925.
- c) The total number of work registrants in the State between October 1, 2012 and September 30, 2013 ($a + b = c$) is 143,895.

2. Unduplicated Work Registrant Count

CBMS has been designed to identify and delete, from the work registration count, duplicate work registrations that occur in the course of the federal fiscal year. On October 1, a list is created of the social security numbers of all mandatory work registrants on Food Assistance. Each month thereafter, the system compares the social security number of each new work registrant with the list created in October and updated monthly. If a social security number appears on the list of previous work registrants, it is not counted as new.

3. Characteristics of Work Registrants

A look at data from CBMS for the state fiscal year ending 6-30-07 produced the following information on the work registrant population in Colorado.

Gender	
Female	51.31%
Male	48.68%
Age	
18-19	9.5%
20-29	26.44%
30-39	25.42%
40-49	24.74%
50+	13.79%

ABAWD Status	
ABAWD	33.99%
Non-ABAWD	66.01%
Household Size	
Single person	46.41%
2-person HH	18.59%
3 person HH	14.77%
4 person HH	10.88%
5 or more	9.35%

B. Exemption Policy

Colorado is currently choosing to exempt from participation in the Food Assistance employment and training program Food Assistance applicants/recipients in counties that have high unemployment or a small number of mandatory work registrants and ABAWDs. The decision on which counties are exempt from participation is made at the state level.

Employment First county workers have the authority to grant individual exemptions under guidelines issued by the State; exemption status is reviewed at recertification.

Personal characteristics or situations which would justify exempting an individual otherwise required to participate in E&T include:

- lack of transportation
- pending legal action
- non-English speaking
- serious lack of job readiness/employability
- job attached (60 day exemption)
- more than 1 hour from Employment First Unit
- transitional living situation including domestic violence shelters
- Working part-time at maximum capacity
- Child care problems interfere with availability for work
- Already doing mandatory community service work for another agency
- Sex offender restrictions

The criteria used to determine an exemption will include:

- the severity of the barrier
- the length of time before employability will be established
- the resources available for removing the barrier
- the availability of other options for assisting the individual.

C. Number of Work Registrants Exempt from the E&T Program

Total Number of individual work registrants exempt from E&T 35,048

D. Planned E&T Program Participation

Colorado expects 13,770 ABAWD applicants and recipients to begin a qualifying ABAWD component. The number of all other applicants and recipients (including ABAWDs involved in non-qualifying activities) expected to begin a component is 19,260. Counting each individual participant only once, an estimated 26,134 individuals are expected to participate in the E&T Program during the fiscal year.

E. A BAWD Information

Based on data from last fiscal year, Colorado estimates:

1. 12,200 ABAWDs in the state subject to the work requirements during FFY 2013
2. 22,080 ABAWDs in waived areas of the State during FFY 2013
3. 2,020 ABAWDs included in the 15% ABAWD exemption allowance.

ABAWD component placements will be primarily workfare with simultaneous or alternative enrollment for a smaller number in employment and training where appropriate and/or requested. The number of ABAWDs expected to commence: 1) workfare is 12,524; and 2) qualifying education and training components is 1,246.

TABLE 1

ESTIMATED PARTICIPANT LEVELS - FISCAL YEAR 2013

A. Anticipated number of work registrants in the State during the fiscal year **143,895**

B. List planned exemption categories and the number of work registrants expected to be included in each during the fiscal year.

1. residing in a county without an E&T program	27,260
2. lack of transportation	130
3. legal action pending	11
4. non-English speaking	188
5. serious lack of job readiness/employability	5,044
6. job –attached (60 day exemption)	497
7. more than 1 hour from Employment First	46
8. working part-time at maximum capacity	605
9. child care problems interfere with availability for work	768
10. already doing mandatory community service work for another agency	24
11. transitional living situation including domestic violence shelters	120
12. sex offender restrictions	355

TOTAL EXEMPTIONS: **35,048**

C. Percent of all work registrants exempt from E&T (B/A) **24%**

D. Number of E&T mandatory participants (A–B) **108,847**

E. Anticipated number of ABAWDs in the State during the fiscal year **36,300**

F. Anticipated number of ABAWDs in waived areas of the State during the fiscal year **22,080**

G. Anticipated number of ABAWDs to be exempted under the State's 15 percent ABAWD exemption allowance during the fiscal year **2,020**

H. Number of at-risk ABAWDs expected in the State during the fiscal year (E–(F+G)) **12,200**

TABLE 2

**^{1.} ESTIMATED E&T PLACEMENTS
FISCAL YEAR 2013**

1.	Number of ABAWD applicants and recipients expected to participate in a qualifying ABAWD component each month. 1,732/mo. * 12	<u>20,784</u>
2.	Number of all other applicants and recipients (including ABAWDs involved in non-qualifying activities) expected to participate in a component each month. 2,909/mo * 12	<u>31,416</u>
3.	Total number of applicants and recipients the State agency expects to participate in a component each month during the fiscal year. 4,350/mo * 12	<u>52,200</u>

**^{2.} ESTIMATED INDIVIDUAL PARTICIPATION
FISCAL YEAR 2013**

Number of individuals expected to participate in the E&T Program during the fiscal year	<u>19,833</u>
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^{1.} Estimate the numbers that will participate in components each month and total them on line 3. This information represents a duplicate count of participants over the course of the fiscal year and corresponds to lines 3 and 4 on the FNS-583, E&T Program Activity Report.

^{2.} Estimate the unduplicated numbers of individuals who will participate during the fiscal year. This information corresponds to line 7 on the FNS-583.

Regardless of the service delivery agent, the state monitors service delivery performance through on-site reviews and automated system reviews. If an agency is not meeting the E&T requirements laid out by the state rules, a corrective action plan is required and payment will be suspended if no action is taken to correct the problem. The social services agency is ultimately responsible for satisfactory delivery of E&T services. If their selected provider is not meeting the service requirements, the local DSS must bring them into compliance or find another provider.

Contract payment is reimbursement for actual cost, and the service delivery agency is expected to provide services to every eligible person. Contracts are competitively awarded if the providers are not other government agencies.

In some cases, the county contracts with providers for specific component services for participants in the county's Employment First program. These contracts are reimbursement for actual costs as defined in the contract for service.

PART IV:

PROGRAM COSTS AND FINANCIAL MANAGEMENT

A. Planned Costs of State E&T Program

The E&T Program in Colorado for FFY 2013 will cost approximately \$6.1million for the enhanced workfare/job search program. When additional funds are available, they are used for enhancements to the service delivery system, including upgraded computer equipment, additional local staff training, additional job search and job seeking skills materials and additional staff to provide enhanced job seeking and job retention skills. The Employment First program also incorporates the optional workfare program, which serves most of the non-ABAWDs and a small portion of the ABAWDs at a cost of approximately \$2.2 million.

The Employment First Program received limited matching State funds from the legislature for program administration and participant reimbursement for the state fiscal year July 1, 2012 through June 30, 2013. In addition, counties will be encouraged to identify and document local in-kind match that meets the requirements of the Food Assistance Act. County programs are also receiving cash donations and county funds.

Operating Budget

Table 4 shows the personnel and operating costs for counties operating the E&T Program. This information comes from budgets submitted annually by the local E&T program operators prior to the allocation of E&T funds. The contract column contains costs for programs operated by another agency on behalf of the county Food Assistance program. These costs are based on budgets for staff and operating costs that are submitted and approved by the State Employment First Unit. All budgets are reviewed to insure that costs are allowable and reasonable. Any costs that do not meet those criteria are denied.

B. Contracts

As previously noted, most contracts for E&T services are between local county agencies. E&T funds are allocated to county departments of social services. In turn some of these departments contract with a local employment and training provider to operate the program. Every county E&T program must submit a plan of operation to the State Employment First Unit for review and approval prior to the beginning of the federal fiscal year. If a county is contracting, all contracts must be submitted to the State for review and approval prior to implementation. The contractor must provide the same information required from the social services programs, including an operating budget. The State office reviews the operational plans, contracts, and budgets. Budgets are not approved until all questions are answered and costs are determined to be reasonable and allowable. All local programs are held to the same requirements regardless of the operator. Payment is based on the contractor's agreement to operate in accordance with rules established by the State Board of Human Services and monitored by the State Employment First Unit.

C. Participant Reimbursement:

Due to increasing fuel costs, affecting both public transportation and personal vehicle use, the State is anticipating an increase in participant reimbursement expenditures for travel related costs, which is our biggest need. Due to limited State general fund, the burden of finding match funding will be on the counties. Dependent care services continue to be an area of low demand in Employment First.

Funds have been appropriated by the State legislature for the State Fiscal Year beginning July 1, 2012 for participant reimbursement. Participant reimbursement is paid with either state or local cash match and 50 percent federal cost sharing up to the actual cost of the participant expenses. Lack of reimbursement funds is not a legitimate reason for exempting an individual from participation. If participants anticipate monthly expenses that exceed the amounts and limits of the E&T program, their participation requirements are modified to reduce their costs.

Method of Reimbursement: Colorado uses an allowance for transportation costs and reimbursement for actual expenses for other participation costs. Participants generally receive bus tokens for round trips from home to the Employment First office. They may also receive gas vouchers for the estimated cost of travel to meet component requirements or make job contacts. Bus passes are purchased when possible for participants who must report to worksites or classes.

Procedure for Reimbursement:

Colorado provides both up-front allowances for expected/estimated costs and reimburses participants after expenses have been incurred. Procedures for providing the funds to the participant vary from county to county. Hard copy documentation is kept at the local level and is required by state regulation. It includes the participant's name, social security number, the purpose and amount of the reimbursement or allowance, and the participant's signature.