

DWP/MFIP ES POLICY

DATE ISSUED: November 4, 2016

FROM: Kate Probert Fagundes, DWP/MFIP/SNAP ES Division Manager

SUBJECT: MFIP and DWP Employment Plan (EP) Expectation

BACKGROUND:

The Ramsey County Workforce Solutions (WFS) philosophy is to realize **each individual's hope and dreams and enhance participant self-determination through use of coaching and participant driven goal setting tools**. The Ramsey County Workforce Solutions philosophy moved from the MFIP and counselor prescription of countable "core hours only" activities to investing in activities that are meaningful to the participant and which support the goal of sustained financial independence.

The process is increasingly driven by participant dreams and ideas about solutions to his or her problems, rather than core activity requirements being the driver. This shift away from a Work Participation Rate (WPR) focus requires clarity regarding employment plan selection and minimum hour requirements.

A participant invests in his or her goals of through activities and the time spent on them. Pursuit and achievement of a goal requires time and effort. The counselor helps the participant plan and allocate time that she/he will need to invest to achieve her or his goals. The WFS valued philosophy of guided self-determination puts the participant "in the driver's seat" with the primary role in identifying and creating a desired future. The employment counselor supports the participant in this process.

Embracing a participant driven goal setting philosophy does not relinquish adherence to DHS expectations about employment plan options, therefore WFS has established guidelines for the employment plan development and use.

PURPOSE:

The purpose of this policy memo is to provide clarity regarding how the DHS MFIP ES Manual employment plan expectations fit with the Workforce Solutions participant-driven goal setting philosophy.

POLICY/GUIDELINES:

Workforce Solutions expects that the correct plan be used at the outset; and that EPs are used in the way described in the ES Manual. The default should be a Regular EP which outlines activities and minimum participation hours or more. If warranted and/or documented, use of a Reduced Hours for Good Cause EP, or a Family Stabilization Services (FSS) EP should be the exception. When creating a Reduced Hours EP, case note the reason. Review the file and EP every three months for the opportunity to increase investing hours and/or shift up to a Regular EP. WFS is not promoting the increased use of Reduced Hours for Good Cause or FSS EPs as a default strategy. WFS is promoting the accurate use of the three EP options described below. Through the use of MI and Coaching strategies and tools, it's expected that the participant's hours in a plan would increase over time to mimic that of full-time employment.

DHS ES Manual Section 7.15 states that employment counselors have the discretion and should make a determination of the appropriate number of hours for each case. It is expected that this discretion conform to the hour requirements of each plan type.

Section 7.3.3 of the ES Manual identifies three types of employment plans: 1) a Regular EP; 2) an FSS EP; and, 3) a Reduced Hours for Good Cause EP.

Workforce Solutions believes that these types of EPs provide the participant with the necessary structure and flexibility to move toward their employment goals. Employment and education should be considered in any of these plans.

WFS Hour Selection Guidelines

EP Type	“At least” Hours Per Week
Regular	<ul style="list-style-type: none"> ▪ At least 21 a week based on the age of youngest child or number of parents on case ▪ At least 31 a week based on the age of youngest child or number of parents on case ▪ 55 a week (combined for both parents in a two parent household as described in Section 7.3.3)
FSS (Start where the participant is at, over time move them to increased activities and hours)	<ul style="list-style-type: none"> ▪ A participant who is ill and incapacitated should have a plan for at least 1 hour per month to reflect follow-up and periodic contact with counselor to provide update on the situation ▪ At least 1-5 hours based on medical appointment, medical opinion form or equivalent ▪ At least 6-10 based on medical appointment, medical opinion form or equivalent ▪ At least 11-19 or more based on medical appointment, medical opinion form or equivalent ▪ 20 hours or more a week based on medical appointment, medical opinion form or equivalent and participant goals
Reduced Hours for Good Cause (Start where the participant is at, over time move them to increased activities and hours)	<ul style="list-style-type: none"> ▪ 1-5 hours per week based on participant situation and goals ▪ 6-10 per week based on participant situation and goals ▪ 11-19 hours per week based on participant situation and goals ▪ 20 hours or more a week based on participant goals

WFS Guidance For Use Of Regular Employment Plan

- No regular employment plan should be written for less than 21 or 31 hours per week (87 or 130 monthly, respectively). If, for reasons covered under good cause, the situation prohibits the participant from doing 21, 31, (or for a 2-parent family, 55 hours), per week, respectively, use the Reduced Hours with Good Cause EP.
- If there is no good cause, use Regular Plan for hours listed in the box above.

WFS Guidance For Use Of Family Stabilization Services (FSS) EP

- The activity requirements, largely influenced/determined by a qualified professional regarding activities and hour limits, medical appointments and participant goals, may differ from other EP type requirements.
- FSS plans are to be written only for the hours approved by medical forms unless the participant agrees to voluntarily increase the hours (document in case notes). However, even if a medical documents recommends 0 hours, the plan should be written to 1 hour to reflect expectation for regular monthly contact
- Employment counselors, through use of MI and coaching are expected to build on the participant's abilities and potential to move forward.
- While all activities must put the participant on the most direct path to employment, the FSS EP exists to support the participant to address education and other barriers prior to being on a direct pathway toward employment.
- In many situations, employment is not feasible without first addressing barriers and issues in the family.
- Remember, employment and/or job search and the FSS employment plan are compatible, not mutually exclusive.
- There may also be situations where "obtaining SSI" or other overall goal may be more appropriate.

WFS Guidance For Use Of Reduced Hours For Good Cause EP

- If there is good cause for not complying with the required minimum hours in a Regular EP, use Reduced Hours for Good Cause EP.
- Again, if, for reasons covered under good cause, the situation prohibits the participant from doing 21, 31, 55 hours, per week, respectively, case note the reason, and write a Reduced Hours For Good Cause EP. See the matrix above for hour selection option.
- WFS believes that the most number of hours of activity is, for many participants, often the most results producing. Start where the participant is at and, over time, and the EP revision opportunity arises, explore the benefits of increased activities and hours.
- Keep in mind that Reduced Hour for Good Cause EPs are to be reviewed every 90 days (three months), or as needed if activity or situation changes.
- In many cases, continuation of the Reduced Hours for Good Cause EP will remain an option at the time of the review, but many may benefit from return to a Regular plan and activities for at least the minimum required hours.

- A Reduced Hours for Good Cause EP should be written based on the participants goals, the good cause reason, participant's abilities, potential, and counselor analysis of the participants current situation.
- Section 7.15 allows the counselor to use the Reduced Hours EP if the counselor determines that it meets good cause.
- WFS suggests, in addition to the good cause information in Section 7.15, that counselors use the following criteria (from Sections 7.6 and) for determining good cause.
- A Reduced Hours EP could be based on the participant's personal and family circumstances that impact or restrict the participant's ability to obtain or retain employment. This could include but is not limited to:
 - any assessment results,
 - the participant's performance,
 - observations of the participant,
 - any special needs of the participant or children, family violence issues,
 - the level of English proficiency,
 - participant's involvement with social services or legal issues when the FSS EP does not apply.
 - Appropriate child care is not available.
 - The job does not meet the definition of suitable employment.
 - The participant is ill or injured.
 - A member of the unit, a relative in the household, or a foster child in the household is ill and needs care by the participant that prevents the participant from complying.
 - The participant is unable to secure needed transportation.
 - The participant is in an emergency situation that prevents compliance with the Employment Plan.
 - The schedule of compliance with the Employment Plan conflicts with judicial proceedings.
 - A mandatory MFIP meeting is scheduled during a time that conflicts with a judicial proceeding or a meeting related to a juvenile court matter, or a participant's work schedule.
 - The participant is already participating in acceptable work activities.
 - Activities identified in the Employment Plan are not available.
 - The participant is willing to accept suitable employment, but employment is not available.
 - The participant documents other verifiable impediments to compliance with the Employment Plan beyond the participant's control.
 - The documentation needed to determine if a participant is eligible for family stabilization services is not available, but there is information that the participant may qualify and the participant is cooperating with the county or employment services provider's efforts to obtain the documentation necessary to determine eligibility.

Other WFS Points

Child Care

Recognize that finding child care for less than 20 hours a week may be problematic due to limited capacity at many daycare providers to serve families less than part-time. Therefore, Reduced Hours or FSS EPs may not be the most aligned with the participant's child care needs.

Monitoring

As described in the WFS Monitoring Guide, Supervisors are expected to periodically review employment plans, and corresponding case notes, to spot check and confirm correct plan use and effort made increase hours and activities by employment counselor,

Sanction

The ES Manual provides guidance on the use of sanction in FSS and non-FSS (participants with a Regular Employment Plan or a Reduced Hours for Good Cause Plan) cases. Sanction can be an effective tool. WFS believes that a counselor's creativity in fostering participant engagement is the more effective tool. Counselors are encouraged to explore alternates of engagement. Counselors are expected to regularly attempt to re-engage even while involved in the sanction process.

Do not sanction participants who are in school and showing progress. Do not sanction participants who are working and submitting required information to FAS. If in either instance the participant is unable to come in to meet with the counselor, sanction is not an option. The counselor must find a way to accommodate the participant.

If an exception to this policy is to be made, the Supervisor should inform or consult the WFS Planner liaison before sanctioning the participant.

EFFECTIVE DATE:

Recognizing that counselors and participants will require sufficient time to rewrite the EP, any nonconforming cases are to be transitioned toward this policy expectation by December 31, 2016. The expectation is that any new or reviewed cases are to conform to this requirement immediately.

CONTACT PERSON: Agency Lead Planner