

**County of Orange Social Services Agency  
Family Self-Sufficiency & Adult Services Division**

**Program/Area:** CalWORKs/Welfare-To-Work  
**Title:** Vocational Education and Training – Privately Funded Postsecondary Educational Institutions  
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**PURPOSE**

This policy provides guidelines when approving and monitoring Welfare-To-Work (WTW) PARTICIPANTs enrolled in privately funded or for-profit postsecondary educational institutions for WTW activities. In this policy, “PARTICIPANT(s)” refers to participant(s) enrolled in privately funded postsecondary educational institutions.

The private institutions must be accredited by the Department of Consumer Affairs, such as the [Bureau for Private Postsecondary Education – Department of Consumer Affairs](#) or [Western Adult Senior College and University Commission](#).

**Note:**

- For participant enrolled in publicly funded or non-profit postsecondary educational institutions, refer to [Policy 223 A VTC/VTR – Publicly Funded Postsecondary Educational Institutions](#).
- Participant who already enrolled in an approvable educational program prior to their WTW Appraisal will be evaluating for Self-Initiated Program (SIP). Refer to [Policy 220 Self-Initiated Program](#) and [Worker Tool 59 - Self-Initiated Program and VTC/VTR Comparison Chart](#).

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**VOCATIONAL EDUCATION AND TRAINING**

Vocational Education and Training (VTC/VTR) is a Post-Assessment activity provides short-term, employment-focused training programs based on the Assessment result that will lead to entry-level employment and self-sufficiency.

VTC/VTR is limited to 12 months as core activity in a lifetime; however, training may be allowed beyond 12 months as non-core activity.

VTC/VTR programs offer trainings in employer-specific job skills, in classroom or jobsite setting, and lead to entry-level employment.

WTW PARTICIPANTS may start their VTC/VTR with a generic major, then transfer to a four-year college/university and remain in school during their CalWORKs (CW) time limit while meeting the participation requirements.

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## VOCATIONAL EDUCATION AND TRAINING DETERMINATION

The Case Manager (CM) will meet with the PARTICIPANT to discuss the VTC/VTR activity, and utilize the [Summary of the VTC/VTR Approval Process](#) (Attachment 1) for guidance.

Utilizing the results of the Online CalWORKs Appraisal Tool (OCAT) and Assessment Report, the CM will collaborate with the PARTICIPANT to develop the [WTW 2 - WTW Plan Activity Assignment](#) with appropriate training program, service provider(s), and supportive services.

VTC/VTR activity consists of:

- **Vocational Education and Training Core (VTC):** 12-month lifetime limit of participation in vocational or educational training as core activity.
- **Vocational Education and Training (VTR):** Additional months of participation in vocational or educational training beyond the 12-month lifetime limit as non-core activity.

The CM will utilize the [Federal Time Limited Activities Worksheet \(F063-41-329\)](#) to track the Vocational Education 12-month lifetime limit.

Note: Tuition is not a reimbursable expense, CMs need to advise PARTICIPANTs of allowable supportive services prior to assigning PARTICIPANTs to VTC/VTR provided by private institutions. Refer to [Policy 315 Ancillary Supportive Services](#).

To approve in a VTC/VTR activity, the CM needs to evaluate the following:

1. The training goal on the [Welfare-To-Work Education/Training Plan \(F063-41-05\)](#) would lead to self-supporting employment. Staff may utilize the [EDD website](#) to obtain wage information and verify if the occupation is on high demand. The Occupation profile obtained from EDD website will be imaged into OnBase and narrated in Case Comments. Refer to the [How to Obtain Labor Market Information](#) (Attachment 4) for guidance.
2. The PARTICIPANT complies with all program regulations and makes satisfactory progress.
3. Evaluate availability of educational loans and grants: the CM shall review the [WTW 8 - Student Financial Aid Statement Welfare-To-Work Supportive Services](#) with the PARTICIPANT. The PARTICIPANT has options whether to use their educational loans/grants to pay for educational expenses or utilize supportive services available to them through WTW. The completed WTW 8 will be imaged into case record.
  - A new WTW 8 is not needed at the beginning of each school term, unless the PARTICIPANT is changing school systems (i.e., private institution to public institution or vice versa). If there is a change to the PARTICIPANT's decision, Section B of the WTW 8 needs to be completed. The PARTICIPANT's updated decision and completion of the form must be documented in case record.
  - If the educational loans and grants are dispersed directly to the school (for most private schools), and the PARTICIPANT does not have the option to decline the use of educational loans or grants for educational expenses, then only the PARTICIPANT's "out-of-pocket" expenses are covered by Ancillary.

Refer to [Policy 315 Ancillary Supportive Services](#) for more information.

If the school/program is not available as a provider in the County's Provider resource, the request to approve the school as a provider must be submitted

to PQA through the chain of command **before** approving the VTC/VTR activity. Refer to the [Adding Schools Not on an Approved List](#) section below.

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**ENTERING SCHOOL INFORMATION IN CASE RECORD** The CM does not have capability to update certain information in a case record as it belongs to the eligibility functionality. This may include school, employment, and financial aid information.

When information needs to be added to case record, the CM will send request to the Eligibility Worker via the [Employment Services Communication](#) (F063-41-211) to update case record.

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**ADDING EDUCATIONAL INSTITUTIONS TO PROVIDER LIST** If the PARTICIPANT's selected school is not approved as a provider, the CM will need to discuss the educational plan with the PARTICIPANT to determine if the selected school or program could lead to employment in a high demand occupation in the local labor market.

The CM will complete the [Request for Non Supportive Services/Vendors](#) form, and forward to FSS-AS Program & Quality Assurance (PQA) via chain of command for approval. Refer to [Steps on How to Complete the Request for Non Supportive Services/Vendors](#) (Attachment 2) and [Example of a completed Non Supportive Services/Vendors](#) (Attachment 3).

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**VOLUNTARY PARTICIPANT** Voluntary PARTICIPANTs (exempt volunteers) may be approved and received supportive services if they meet all conditions as stated in the [VTC/VTR Determination](#) section above.

There is no minimum participation hour requirement for voluntary PARTICIPANTs. They may volunteer for as many hours as desired and may change them at any time. A new WTW Plan must be completed when there are changes to WTW activity, participation hours, and/or supportive services.

Voluntary PARTICIPANT may end their participation at any time without penalty but will lose their supportive services. Refer to the Exempt Volunteer section in [Policy 240 Good Cause/ Compliance/ Sanction](#) for more information.

Months participating in VTC/VTR activity while exempt does not count towards the Vocational Education 12-month lifetime limit.

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**MONTHS THAT WILL NOT COUNT TOWARDS THE VOCATIONAL EDUCATION 12-** Any month in which the family meets the required core hours in a concurrent activity, other than VTC/VTR, **or** the individual is a voluntary PARTICIPANT will not be counted toward the Vocational Education 12-month lifetime limit.

**Example 1:** PARTICIPANT is a single parent with a child under 6 months of age and is a voluntary PARTICIPANT and assigned to VTR activity. The

## MONTH LIFETIME LIMIT

month does not count towards the Vocational Education 12-month lifetime limit.

**Example 2:** PARTICIPANT is a single parent with no child under 6 years of age and is required to meet a minimum of 20 core hours per week. PARTICIPANT is working (Unsubsidized Employment) part-time 22 hours per week, and concurrently participating in 18 hours in VTR. PARTICIPANT meets the core hourly participation requirements with Unsubsidized Employment hours; therefore, the month does not count towards the Vocational Education 12-month lifetime limit.

**Example 3:** PARTICIPANT is a single parent with a child under 6 years of age and is required to meet a minimum of 20 core hours per week. PARTICIPANT is assigned to 18 hours in VTR and 4 hours of Job Skills (non-core activity). Since PARTICIPANT does not meet core hours requirements, the month does not count towards the Vocational Education 12-month lifetime limit.

**Example 4:** Same PARTICIPANT in example 3. The CM receives verification that the PARTICIPANT added a class (6 hours per week). The PARTICIPANT is now meeting core hours requirements with VTC activity, the month counts towards the Vocational Education 12-month lifetime limit.

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## WELFARE-TO-WORK PLAN

VTC/VTR must be reflected in the [WTW 2 - WTW Plan Activity Assignment](#). If the PARTICIPANT does not meet the minimum average of 20/30/35 required hours per week of participation in a VTC/VTR activity, the WTW Plan must include concurrent activity(ies). Refer to [WT 15 - WTW Activities Worker Tool](#). The CM shall:

- Assist the PARTICIPANT to identify concurrent activities as appropriate.
- Review the school's website to determine the length and dates of school breaks. The CM should anticipate the school break(s) and design the WTW Plan to have the PARTICIPANT comply with the minimum hourly participation requirements by advising the PARTICIPANT of his/her bridging activity options. Refer to [School Breaks](#) section below for more information.
- Clearly indicate the final training goal on the WTW Plan, and be as specific as possible (i.e., VTC - AA in Business Administration with intention to transfer to obtain a BA degree). Hours should be consistent with the class schedule and allowable study time.

Prior to the start of each new school semester, the PARTICIPANT must meet with the CM to sign a new WTW Plan. The final training goal will remain unchanged. PARTICIPANTs who fail or refuse to sign a new WTW Plan each semester without good cause will be subject to the noncompliance

process. Refer to [Policy 240 Good Cause/Compliance/Sanction](#) for more information regarding noncompliance process.

To avoid interruption, the new WTW Plan needs to be completed prior to the start of the new semester.

The CM may need to meet with the PARTICIPANT on campus to sign the WTW Plan if an office appointment is not feasible and would interrupt participation.

Refer to [Policy 211 WTW Plan](#) for information on developing the WTW Plan.

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### **SELECTION OF ALLOWABLE ACTIVITIES AND CLASSES**

The CM should verify with PARTICIPANTs if work-study, internships, or other approvable activities are available. Allowable classes/courses include, but not limited to:

- General Education classes: classes may be outside the primary area of study but are required to complete the VTC/VTR goal.
- Elective classes: classes may also be outside the primary area of study for the VTC/VTR goal and should be reasonable to meet the educational requirements in order to receive supportive services.
- Online and Distance Learning classes: virtual classes in place of in-person classes. Refer to [Policy 315 Ancillary Supportive Services](#) for allowable ancillary list.
- Telecourses: televised classes. **Note:** If the PARTICIPANT selected a telecourse, WTW Ancillary Supportive Services would not cover the expense of purchasing a television or other related equipment required for the class.

The CM should consult with the [SSA Regional Office Educational Liaison](#) for assistance as needed.

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### **SPECIAL CLASSES AND LEARNING DISABILITY EVALUATION**

PARTICIPANTs may enroll in special classes or tutorials to address learning disabilities. The time spent in these classes and tutorials are to be allowed toward the hourly participation if the educational institution determines them to be necessary. A letter from the educational institution or the learning disability evaluation report must be on file.

When a PARTICIPANT needs to be tested for a learning disability related to his/her educational plan, it is expected that the institution will complete the testing. However, if the institution cannot provide the testing timely, the CM shall refer the PARTICIPANT to the Learning Disability Evaluation (LDE). Refer to [Policy 210A Learning Disability Screening and Evaluations](#) for more information.

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**ALLOWABLE WORK PARTICIPATION HOURS** Allowable participation hours in VTC/VTR activity may include:

- Class time
- Supervised study time
- Unsupervised study time
- Laboratory time, as required by instructor
- Internships

**Attendance**

Monthly attendance reports are required. Self-reporting by the PARTICIPANT is acceptable. Self-reporting class and laboratory hours must be verified with the class schedule if the provider will not complete the attendance report.

**Study time**

PARTICIPANTs are allowed study time hours. Hours spent in supervised study time and up to one hour of unsupervised study time for each class hour may be allowed as participation hours. However, the total study time (supervised and unsupervised) shall not exceed the study time recommended by the educational program. Exception will be allowed for a learning disability with appropriate documentation.

**Participation Documentation**

By the 10<sup>th</sup> of each month, the PARTICIPANT must submit:

- [WTW Attendance/Progress Report](#) (F063-41-06) along with the [WTW/Self-Certification of Unsupervised Study Time](#) (F063-41-413)
- Internship participation hours must be verified by the institution or internship sites

Refer to [Worker Tool 60 - Study Time and Acceptable Documentation Guidelines](#) for more information.

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**SCHOOL BREAKS**

During breaks of one week or less, the PARTICIPANT's WTW activity that would normally be scheduled counts as participation.

Unless there is good cause, PARTICIPANTs must continue to meet the required WTW participation hours during school breaks of more than one week according to the terms of their [WTW 2 - WTW Plan Activity Assignment](#).

- If the school break is longer than one (1) week, appropriate WTW activity(ies) must be included in the WTW Plan to cover school breaks that last up to six weeks.
- If the school break is more than six weeks (i.e., summer or winter break), a new WTW Plan shall be developed **before** the break begins. The school break activity(ies) should be collaborated and

mutually agreed with the PARTICIPANT, to ensure the PARTICIPANT knows what is expected of them during the school break.

Note: If the PARTICIPANT is assigned to a bridging activity that requires a referral to be submitted, the referral shall be sent to the provider no earlier than four (4) weeks prior to the begin date of the bridging activity.

Refer to [WTW 15 - WTW Activities Worker Tool](#) for a list of approved bridging activities.

**Example 1:** There is a break of one week. Bridging activity is not required. Actual hours attended during the month are recorded in case record, and the additional hours allowed for the break are narrated in Case Comments. The PARTICIPANT should be encouraged to participate in a bridging activity during school breaks.

**Example 2:** There is a break of more than one week. The PARTICIPANT must participate in a bridging activity for the required minimum average hours per week during the length of the break. Actual hours for VTC/VTR and bridging activities are recorded in case record and narrated in Case Comments.

Note: Although voluntary PARTICIPANTS are not required to meet the weekly participation hours, the CM should strongly encourage the PARTICIPANT to participate during the school breaks.

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**ACADEMIC  
SATISFACTORY  
PROGRESS  
EXPECTATIONS**

The CM shall stress that the academic standard is necessary to ensure the PARTICIPANT's future success when achieving his/her program goal. Refer to [Policy 208 Satisfactory Progress in Educational Activities](#) for more information.

PARTICIPANTS must submit grade reports, or other documentation from the institution to verify satisfactory progress at the end of each grading period.

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**SCHOOL AND/OR  
MAJOR CHANGE**

All school and/or major change for PARTICIPANTS enrolled in private postsecondary institutions require FSS-AS PQA approval.

Upon receiving a major change request from PARTICIPANTS, CMs will complete the [Private School Major Change Checklist \(F063-41-443\)](#) and:

1. Review PARTICIPANT's current progress (i.e., report card and/or the [WTW Attendance/Progress Report F063-41-06](#)) to ensure the PARTICIPANT is currently making satisfactory progress in VTC/VTR activity.
2. Review the Assessment report to ensure the change is in alignment with the academic levels and employment recommendations.

3. Gather Wage, Employment Projected Growth, and Average Annual Job Opening information for both occupations. Refer to the [How to Obtain Labor Market Information](#) (Attachment 4) for guidance.

The completed checklist and EDD information will be submitted to FSS-SA PQA for approval via chain of command.

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## **VTC/VTR INTERRUPTION**

If VTC/VTR participation is paused or interrupted, the PARTICIPANT may resume in the originally approved VTC/VTR career goal if all the following are met:

- Good cause criteria are met. Refer to [Policy 240 Good Cause/Compliance/Sanction](#).
- The PARTICIPANT was in good standing at the time of interruption.
- Sanctioned PARTICIPANT may resume the VTC/VTR activity if the sanction is cured, and the PARTICIPANT is verified to be in good standing in their VTC/VTR activity.

A new [Welfare-To-Work Education/Training Plan \(F063-41-05\)](#) is required if there is any change due to interruption.

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## **COMPLETION OF THE VTC/VTR GOAL**

Upon completing the educational training program goal, the PARTICIPANT returns to the regular flow of WTW activities. The VTC/VTR is completed when the educational training goal is achieved and verified by the provider. A PARTICIPANT is not allowed to remain in school with a new goal simply because they have not exhausted the CW time limit. They may independently remain in school and pursue other goals outside the WTW program.

The CM will:

- Update case record and Case Comments to show the VTC/VTR training is completed.
  - Obtain verification and confirm that the training goal has been completed and upload verification in OnBase. Note: CM will send request to the Eligibility Worker via the [Employment Services Communication](#) (F063-41-211) to update case record, include the school information and completion date.
  - Complete an in-depth Re-Appraisal with the PARTICIPANT to determine the most appropriate WTW activity(ies), including Subsidized Employment. Refer to [Policy 201 Appraisal/Re-Appraisal](#) for more information.
  - Make an effort to acknowledge the PARTICIPANT's milestone accomplishment upon their graduation.
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## REGIONAL EDUCATIONAL LIAISONS

Each Regional Office has selected a primary and a back-up [SSA Regional Office Educational Liaison](#) to work with the CMs, providers, and to assist with vocational educational related case questions.

The Regional Educational Liaison will work with the provider and regional staff to handle complex or unusual case situations related to educational and related supportive services.

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## REFERENCES

ACL 04-41, ACL 06-09, ACL 14-27, ACL 15-21, ACL 15-09, ACIN I-84-06, EAS 42-701.2, EAS 42.711, EAS 42-714, EAS 42-716.1

[Policy 100-F1 Welfare-To-Work Exemptions](#)

[Policy 201 Appraisal/Re-Appraisal](#)

[Policy 202 Work Participation Hours and Activities](#)

[Policy 208 Satisfactory Progress](#)

[Policy 210 Vocational Assessment](#)

[Policy 210A Learning Disability Evaluation](#)

[Policy 211 WTW Plan](#)

[Policy 221-A Orange County List of Approved Educational Providers and Programs](#)

[Policy 221-B Orange County List of Approved Educational Providers and Programs](#)

[Policy 221-C Orange County List of Approved Educational Providers and Programs](#)

[Policy 223-A VTC/VTR –Public Postsecondary Educational Institutions](#)

[Policy 240 Good Cause/Compliance/Sanction](#)

[Policy 301 Child Care Eligibility and Application Process](#)

[Policy 310 Transportation Supportive Services](#)

[Policy 315 Ancillary Supportive Services](#)

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## ATTACHMENTS

[CW Program Community College Contact List](#)

[SSA Regional Office Educational Liaison Contacts](#)

[Worker Tool 15 - WTW Activities Worker Tool](#)

[Worker Tool 59 - Self-Initiated Program and VTC/VTR Comparison Chart](#)

[Worker Tool 60 - CW Study Time Guidelines and Acceptable Documentation](#)

[WTW Plan Example 1](#)

[WTW Plan Example 2](#)

[WTW Plan Example 3](#)

Attachment 1: [Summary of the VTC/VTR Approval Process](#)

Attachment 2: [Steps on how to complete the Request for the Non Supportive Services/Vendors form](#)

Attachment 3: [Example of a Completed Non-Supportive Services/Vendors form](#)

Attachment 4: [How to Obtain Labor Market Information](#)

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## FORMS

[F063-41-05 Welfare-To-Work Education/Training Plan](#)

[F063-41-06 WTW Attendance/Progress Report](#)

[F063-41-121 Supportive Services Referral & Information](#)

[F063-41-202 Academic and Progress Expectations](#)

[F063-41-211 Employment Services Communication Document](#)

[WTW 2 Welfare-To-Work Plan Activity Assignment](#)

[WTW 8 Student Financial Aid Statement Welfare-To-Work Supportive Services](#)

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OCSA