

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

**Program/Area:** CalWORKs/Welfare-To-Work  
**Title:** Vocational Education – Privately Funded Postsecondary Educational Institutions  
**Number:** 223 **Status:** Signature on File  
**Effective Date:** 08/14/2001 **Date:** 09/06/2022  
**Approved:**

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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 a Vocational Education (Voc Ed) activity.

Note: For participants enrolled in publicly funded or non-profit postsecondary educational institutions, refer to [Policy 223 A – Vocational Education – Publicly Funded Postsecondary Educational Institutions](#).

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**VOCATIONAL EDUCATION**

**Vocational Education (Voc Ed) includes:**

**Vocational Education and Training (Voc Ed– Private for Profit)** is a post-Assessment Voc Ed activity that provides employment-focused training programs based on the Assessment result that will lead to entry-level employment and self-sufficiency. Participants may start their Voc Ed with an undeclared major, then transfer to a college/university as appropriate and remain in school during their CalWORKs (CW) time limit while meeting the participation requirements.

**Self-Initiated Program (SIP)** is a Voc Ed activity where participants are self-enrolled in an educational program at a private institution prior to their WTW Appraisal date.

- Pre-SIP is a placeholder to issue necessary supportive services to the participants while SIP is under evaluation and approval. Refer to Pre-SIP Activity section in [Policy 315 Ancillary Supportive Services](#) for specific details.
- If SIP is denied, the participant may finish the current school term before being assigned to a different WTW activity unless the participant has changed to an approved educational program that begins the next semester.

**Note:** The [WTW SIP Denial](#) (F063-41-623) Notice of Action (NOA) must be issued to the participant when the SIP is denied.

Refer to [Worker Tool 59 - Self-Initiated Program and Vocational Education Comparison Chart](#).

**Adult Basic Education (ABE)** is a post-Assessment Voc Ed activity which includes reading, writing, math, high school proficiency or General Education Development (GED) certificate instruction, English-As-A-Second Language

(ESL) and Vocational ESL. As appropriate and necessary for the removal of the individual's barriers to employment, a participant lacking basic literacy or mathematics skills, a high school diploma or GED, or English language skills, shall be assigned to participate in ABE. Adult Basic Education can be a stand-alone activity.

All provisions in this policy would apply to Voc Ed activities, including Voc Ed – Private for Profit/SIP/ABE.

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**BOOKMARKS**

- [VOC ED EVALUATION](#)
- [ADDING EDUCATIONAL INSTITUTIONS TO PROVIDER LIST](#)
- [ENTERING SCHOOL INFORMATION IN CASE RECORD](#)
- [SUPPORTIVE SERVICES](#)
- [VOLUNTARY PARTICIPANTS](#)
- [WELFARE-TO-WORK PLAN](#)
- [SELECTION OF ALLOWABLE ACTIVITIES AND CLASSES](#)
- [SPECIAL CLASSES AND LEARNING DISABILITY EVALUATION](#)
- [ALLOWABLE WORK PARTICIPATION HOURS](#)
- [SCHOOL BREAKS](#)
- [ACADEMIC SATISFACTORY PROGRESS EXPECTATIONS](#)
- [FAILURE TO MAINTAIN SATISFACTORY PROGRESS](#)
- [VOC ED INTERRUPTION](#)
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**VOCATIONAL  
EDUCATION (VOC  
ED) EVALUATION**

The CM will meet with the participant to discuss the Voc Ed activity and utilize the [Summary of Vocational Education \(Voc Ed\) Approval Process](#) for guidance.

Utilizing the results of the Online CalWORKs Appraisal Tool (OCAT) and Assessment Report as appropriate, the CM will collaborate with the participant to develop the [WTW Plan Activity Assignment](#) (WTW 2) with appropriate training programs, service providers, and supportive services.

If the participant obtained a bachelor's degree of any kind, including a degree from outside the USA, prior to entering the WTW program, the participant is not eligible to participate in a Voc Ed activity unless the participant is pursuing a California teaching credential.

All major and/or school change requests must be submitted to FSS-AS Policy & Quality Assurance (PQA) for approval. Refer to the [Summary of Vocational Education \(Voc Ed\) Approval Process](#) for more details.

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

institutions from a certifying organization (must include the organization's website).

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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 complete the [Request for Non Supportive Services/Vendors](#) form, and forward to FSS-AS Policy & Quality Assurance (PQA) via chain of command for approval.

Refer to the [Add WTW School Provider to the WTW Educational Provider List Processing Guide](#) (PG) for further instructions.

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**ENTERING  
SCHOOL  
INFORMATION IN  
CASE RECORD**

All school information must be entered into the case record. Refer to page 10 of the [CalOAR Detail Window Desk Guide](#).

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

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**SUPPORTIVE  
SERVICES**

The CM will evaluate the participants' need for any supportive services necessary to participate in their assigned Voc Ed activity.

**Note:** Tuition is not a reimbursable expense. CMs need to advise participants of allowable supportive services prior to assigning participants to Voc Ed activity.

Refer to [Policy 301 – CalWORKs Child Care Program](#), [Policy 310 – Transportation Supportive Services](#), and [Policy 315 – Ancillary Supportive Services](#) for additional information.

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**VOLUNTARY  
PARTICIPANT**

Voluntary participants may be approved and receive supportive services if they meet all conditions as stated in the [Vocational Education \(Voc Ed\) Evaluation 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 the WTW activity, participation hours, and/or supportive services.

Voluntary participants may end their participation at any time without penalty but will lose their supportive services. Refer to the Exempt Volunteer section in [Policy 240 - Noncompliance Process](#) for more information.

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**WELFARE-TO-  
WORK PLAN**

Voc Ed activity must be reflected in the [WTW Plan Activity Assignment](#) (WTW 2). If the participant does not meet the minimum average of 20/30/35 required hours per week of participation in the Voc Ed activity, the WTW Plan must include concurrent activity(ies). Refer to [WT 15 - WTW Activities Matrix](#).

The CM Shall:

- Clearly indicate the final training goal on the WTW Plan, and be as specific as possible (e.g., Voc Ed - 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.

- Review the school's website to determine the length and dates of school breaks. The CM should anticipate school breaks and design the WTW Plan so the participant can comply with the minimum hourly participation requirements during the school breaks by advising the participant of the individual's bridging activity options. Refer to [School Breaks](#) section below for more information.
- Assist the participant to identify concurrent activities as appropriate.

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 Noncompliance Process](#) for more information.

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 are not limited to:

- General Education classes: may be outside the primary area of study but are required to complete the Voc Ed goal.
- Elective classes: may also be outside the primary area of study for the Voc Ed 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 Contact List](#) 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 Voc Ed 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 if the provider will not complete the attendance report. The reported class and laboratory hours must be verified with the class schedule.

**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. Exceptions will be allowed for a learning disability with appropriate documentation.

**Participation Documentation:**

By the 10th 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 site.

**Required documentation:**

- A course syllabus, catalog, etc. with the expected number of study hours for a specific course.
- Additional email, phone contact, etc. between the education provider, internship site supervisor and the Case Manager may be used to support documentation. Contact must be narrated in Case Comments.

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**SCHOOL  
BREAKS**

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 Plan Activity Assignment](#) (WTW 2).

- During breaks of one week or less, the participant's normally scheduled

WTW activity counts as participation.

- For school breaks longer than one week, an appropriate bridging WTW activity must be included in the WTW Plan to cover school breaks that last up to six weeks.
- For school breaks more than six weeks (i.e., summer or winter break), a new WTW Plan shall be developed **before** the break begins. The school break activities should be collaborated with, and mutually agreed to by, the participant and CM 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 weeks prior to the begin date of the bridging activity.

Refer to [WT 15 - WTW Activities Matrix](#) 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 Voc Ed and bridging activities are recorded in case record and narrated in Case Comments.

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**ACADEMIC  
SATISFACTORY  
PROGRESS  
EXPECTATIONS**

Meeting academic standards is necessary to ensure the participants' future success in achieving their educational goal.

The CM will:

- Review the [Academic and Progress Expectations](#) (F063-41-202) with the participant when completing or revising the WTW Plan, and when a potential failure to make satisfactory progress exists.
- Assess whether the participants have a learning or physical disability that might contribute to participants' failure of satisfactory progress. Refer to [Policy 210A Learning Disability Screening and Evaluations](#).
- Identify any barriers that are interfering with the participants' satisfactory progress and make appropriate referrals to assist them with needed barrier-removal services. This includes when the participants receive a Withdrawal, Incomplete, or No Credit. Refer to [Policy 401 Behavioral Health Services](#), [Policy 402 Domestic Abuse Services](#) and [Policy 407 Family Stabilization Program](#).

The participant must:

- Complete and sign the [Academic and Progress Expectations](#) (F063-41-202)
- Submit grade reports or other documentation from the institution to verify satisfactory progress.

**Note:** Schools may have different policies when grades are available therefore, the CM should review school’s website to determine when grades will be posted.

**FAILURE TO MAINTAIN SATISFACTORY PROGRESS OR MEETING PARTICIPATION**

The CM shall evaluate for good cause determination and initiate the noncompliance process according to [Policy 240 Noncompliance Process](#) when the participants:

- Do not meet participation requirements
- Fail to make satisfactory progress or provide proof of satisfactory progress

The participants may be removed from their Voc Ed activity and be re-evaluated for a more appropriate activity if necessary.

**VOCATIONAL EDUCATION INTERRUPTION**

Voc Ed activity is paused or interrupted, the participant may resume the originally approved Voc Ed goal if all the following are met:

- Good cause criteria are met. Refer to [Policy 240 Noncompliance Process](#).
- The participant was in good standing at the time of interruption.
- Sanctioned participant may resume the Voc Ed activity if the sanction is cured, and the participant is verified to be in good standing in their Voc Ed activity.

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

**COMPLETION OF THE VOCATIONAL EDUCATION GOAL**

The Voc Ed is completed when the educational goal is achieved and verified by the provider. Upon completing Voc Ed goal, the participant returns to the regular flow of WTW activities. The 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 Voc Ed 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 Document](#) (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 activities, 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 a primary and a back-up [SSA Regional Office Educational Liaison Contact List](#) to work with the CMs, providers, and to assist with vocational education 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 supportive services.

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**REFERENCES**

ACL 00-08; ACL 04-41; ACL 06-09, ACL 14-27, ACL 15-09; ACL 15-21, ACL 15-80, ACL 19-48, ACIN I-84-06, ACIN I-13-11; 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 210 Assessment](#)  
[Policy 210A Learning Disability Screening and Evaluation](#)  
[Policy 211 WTW Plan](#)  
[Policy 223A Vocational Education and Training – Public Funded Postsecondary Educational Institutions](#)  
[Policy 240 Noncompliance Process](#)  
[Policy 301 CalWORKs Child Care Program](#)  
[Policy 310 Transportation Supportive Services](#)  
[Policy 315 Ancillary Supportive Services](#)  
[Policy 401 Behavioral Health Services](#)  
[Policy 402 Domestic Abuse Services](#)  
[Policy 407 Family Stabilization Program](#)

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**ATTACHMENTS**

[Add WTW School Provider to the WTW Educational Provider List Processing Guide](#)  
[CW Program Community College Contact List](#)  
[Major and/or School Change Request – Private \(For Profit\) Postsecondary Institutions Processing Guide](#)  
[SSA Regional Office Educational Liaison Contacts List](#)  
[Summary of Voc Ed Approval Process](#)  
[Worker Tool 15 - WTW Activities Matrix](#)  
[Worker Tool 59 - Self-Initiated Program and Vocational Education Comparison Chart](#)

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**FORMS**

[F063-41-05 Welfare-To-Work Vocational 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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OCCSSA