
Colorado SNAP E&T State Plan

Federal Fiscal Year
2017



COLORADO
Office of Economic Security
Division of Employment & Benefits

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A. Authorized Signatures

State: Colorado

State Agency: Colorado Department of Human Services

Federal FY: 2017

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Certified By:

Katie Griego, Director

Date

Certified By:

B. Assurances

Assurance Statement	
1. The state agency is accountable for the content of the State E&T plan, and will provide oversight of any sub-grantees.	<input type="checkbox"/>
2. The state agency is fiscally responsible for E&T activities funded under the plan is liable for repayment of unallowable costs.	<input type="checkbox"/>
3. State education costs will not be supplanted with Federal E&T funds.	<input type="checkbox"/>
4. Cash or in-kind donations from other non-federal sources have not been claimed or used as a match or reimbursement under any other federal program.	<input type="checkbox"/>
5. If in-kind goods and services are part of the budget, only public in-kind services are included. No private in-kind goods or services are claimed.	<input type="checkbox"/>
6. Documentation of state agency costs, payments and donations for approved E&T activities are maintained by the state agency and available for USDA review and audit.	<input type="checkbox"/>
7. Contracts are procured through competitive bid procedures governed by state procurement regulations.	<input type="checkbox"/>
8. Program activities are conducted in compliance with all applicable federal laws, rules and regulations including Civil Rights and OMB regulations governing cost issues.	<input type="checkbox"/>
9. E&T education activities directly enhance the employability of the participants; there is a direct link between the education activities and job readiness.	<input type="checkbox"/>
10. Program activities and expenses are reasonable and necessary to accomplish the goals and objectives of SNAP E&T.	<input type="checkbox"/>
11. The E&T program is implemented in a manner that is responsive to the special needs of American Indians on Reservations. State shall: consult on an ongoing basis about portions of the state plan which affect them; submit for comment all portions of the state plan that affect the ITO; if appropriate and to the extent practicable, include ITO suggestions in the state plan.	<input type="checkbox"/>

By signing on the cover page of this document, the Director and financial representative certify the above assurances are met.

C. State E&T Program, Operations and Policy

[Narrative in lieu of Table 1: State E&T Program, Operations and Policy Overview]

1) Summary of SNAP E&T Program

In Colorado, the Supplemental Nutritional Assistance Program, Employment & Training program (SNAP E&T), as required by 7 CFR 273.7(e), and the Section 20 Optional Workfare program allowed under the provisions of 7 CFR 273.7(M), operate together as the “Employment First” program. Employment First has operated in the state since the program’s inception in 1985; Employment First endeavors to help SNAP recipients in Colorado find support in looking for work, connect to meaningful employment, and succeed in pursuit of economic well-being. Employment First is administered at a state level by the Colorado Department of Human Services, Office of Economic Security, Employment and Benefits Division. The mission of the Colorado Department of Human Services (CDHS) is “to design and deliver high-quality human services and healthcare that improves the safety, independence and well-being of the people of Colorado.” CDHS pursues this mission across a breadth of state and federal programming, including oversight of the state’s mental health system, child welfare and childcare systems, youth correction system, disability determination, and administration of child support and public assistance programs, among others.

Colorado is a county-administered state with 64 counties, as is among the most localized of the 13 states nationwide that operate a state-supervised, county-administered model. Federal regulations, state statute, and codified regulations provide the administrative code of operation for all human service programs in the state, including Employment First. County administrations of human services programs, and the parameters of state-supervision and county-administration, are outlined in Colorado statute (C.R.S. Title 26). This statutory framework provides for local control where feasible, and prioritizes county-level operation of programs that allow for such delegation, including issuance of food and public assistance, and their associated work programs.

Regulations for the Employment First program are promulgated by the State Board of Human Services; additional guidance is provided through the dissemination of policy, training, and technical assistance. As defined in state regulations, county departments that do not have

unemployment above 10% or an insufficient number of jobs (i.e. qualify for a federal waiver or are appropriate for an exemption due to economic circumstances) must operate mandatory SNAP E&T programming for all work-registrants, including able-bodied adults without dependents (Colorado Code of Regulations 4.310.9). In calendar year 2016, 44 counties operated an Employment First program; this included several counties that met the criteria to preclude them from mandatory program operation, but who voluntarily opted in. Counties that operate Employment First, by mandate or by choice, are required to submit a plan for program operation to CDHS for review and approval on an annual basis; plans must adhere to all applicable rules and regulations, and within those parameters, may be locally tailored based upon local capacity, resources and community needs. As an ABAWD Pledge state, all Employment First counties operate as Pledge Programs. County departments may sub-contract portions of their Employment First program, but they retain all fiscal and oversight responsibilities regardless of contractual delegations.

2) Program Changes

As the economy continues to recover from the impacts of the 2008 recession, Colorado, like many states, has experienced a precipitous decline in the ability to meet ABAWD waiver criteria, due to improving unemployment rates statewide. While the unemployment rate in Colorado is below pre-recession levels, at 3.7% at the time of this report, the same cannot be said for SNAP uptake. The number of distinct clients receiving SNAP benefits in Colorado for FFY15 was more than double that in FFY 2008; this is a strong indicator that while the economy is improving, wages and/or hours of work available are not sufficient to ameliorate the need for public assistance for thousands of Coloradans. In short, while jobs are available, they are inadequate to meet basic needs. This in turn places an increased emphasis on the SNAP employment and training program, and the critically important role it plays. Unfortunately, funding of this program remains flat, while volume has increased substantially. This has required Colorado to make programmatic adjustments going into FFY 2017, including the utilization of 15% ABAWD exemptions to exempt whole counties from operation due to high unemployment and other economic factors, when waiver criteria cannot be met.

In the coming fiscal year, forty (40) of sixty-four (64) Colorado counties will operate a mandatory E&T program for all work-registrants, including ABAWDs. All counties with an E&T program will operate as ABAWD Pledge counties. Counties that do not operate an E&T program

either qualify for a federal ABAWD waiver, or will have the ABAWDs residing in their county exempted using the state's 15% exemptions.

3) Workforce Development System

The various state agencies in Colorado that support economic development, either through engagement with job-seekers, industry, or both, are all aligned under the Colorado Blueprint (www.advancecolorado.com). This guiding framework provides resources, direction, and integration across a spectrum of organizations, all unified in supporting six (6) core objectives:

1. Build a Business-Friendly Environment
2. Retain, Grow and Recruit Companies
3. Increase Access to Capital
4. Create & Market a Stronger Colorado Brand
5. Educate & Train the Workforce of the Future
6. Cultivate Innovation & Technology

Employment First is particularly concerned with objective 5, Educate & Train the Workforce of the Future. Employment First recognizes that SNAP recipients are a vital component of the talent pipeline, and are critical in filling middle skills jobs in the marketplace. The Employment First program supports this goal through providing robust internship (workfare) opportunities, and connecting program participants with education, training and credentialing opportunities. While less than a 4-year degree, these educational opportunities equip participants with the credentials to access career pathways in the labor market. Colorado has been a national leader in the development of sector-based strategies, and prioritizes industry-led training and credentialing across our fourteen (14) key industries:

- Advanced Manufacturing
- Aerospace
- Bioscience
- Creative Industries
- Defense & Homeland Security
- Electronics
- Energy & Natural Resources
- Financial Services
- Food & Agriculture
- Health & Wellness

- Infrastructure Engineering
- Outdoor Recreation
- Technology & Information
- Tourism & Outdoor Recreation
- Transportation & Logistics

Colorado's workforce development system is overseen by the Colorado Workforce Development Council (CWDC), and the Colorado Department of Human Services is a council member. Our workforce system is comprised of 10 federally recognized development areas, made up of one or more counties. These workforce areas are governed by local workforce development boards, which ensure compliance with federal regulation and state rule, and the administration of local workforce development services, including Titles I and II of the Workforce Innovation and Opportunity Act (WIOA), Adult Education, and Vocational Rehabilitation services. Programs are supervised at the state level by the Colorado Department of Labor and Employment (CDLE), and at the local level may be operated by state or county employees, or their subcontractors. Many local area workforce systems are embedded within the larger umbrella of the county human service department, though this is not the case for all.

Changes to the workforce development system through the enactment of WIOA has allowed for increased collaboration across a variety of employment service programs, including SNAP E&T. As a county-administered state, Colorado encourages local level partnerships between Employment First and the workforce system, and many local areas operate the Employment First program through the workforce development system. This model of full integration works particularly well in areas with a robust workforce presence, and where administrative structures allow for ease of operation. As a state with large rural areas, Colorado has 22 counties with no physical workforce presence. In these areas, alignment with the workforce development system and Employment First may be limited by physical accessibility, but includes sharing of best practices for job-seekers, dissemination of labor market information, and access to virtual workforce centers and job-search online.

Employment First participants are encouraged to engage with the workforce development system, and Colorado ensures that components associated with job search and training through WIOA count towards mandatory participation as allowable under federal regulations. In local areas where Employment First is imbedded in the American Job Center, Employment First customers benefit from an array of services available to them, including resume writing workshops, career development and job coaching, access to labor market information, adult

education and vocational rehabilitation services, and much more. In areas where geography limits access to the full array of services, county human service departments and their local partner organizations fill the gaps; by leveraging economic development resources, community colleges and local chambers of commerce, among others, to ensure alignment with emerging markets and that sector-based training opportunities are maximized for SNAP E&T participants.

4) Other Employment Programs

Colorado does not operate a state general assistance program. Colorado's TANF program (Colorado Works) and the SNAP E&T program, Employment First, are overseen by the same Division within CDHS, and these programs share one manager and a supervisor. As such, SNAP E&T staff are cross-trained on TANF, and vice versa. This structure supports and reflects the structure at the operational level for our counties, where public assistance work programs align administratively, to meet common goals and serve similar populations. While these programs are distinct in their funding, mandates, programmatic rules, and outcome requirements, Colorado has found a great deal of commonality, and in those common areas, leverages expertise in workforce development and employment opportunities across both program areas.

Colorado does not utilize SNAP E&T funding on TANF programming, or vice versa, and staff must complete 100% time reporting across all programs in which they work. However, Colorado is one of few states with the ability to spend SNAP E&T funds on TANF purposes and populations, per CFR 7273.3 (d) (ii) (D) (1). At this time, however, Colorado does not use funds in this manner. At the participant level, individuals participating in Title IV-A programming are exempted from participation in Employment First (per federal regulations) but may choose to voluntarily participate if they so desire.

5) State Options in E&T Participants

Colorado does not serve categorically eligible, zero benefit households; individuals in these households meet the standard Federal exemptions or the Colorado exemptions. SNAP applicants are referred to the Employment First Program before determination of benefits, if they cannot otherwise be found exempt. This ensures the State engages the ABAWD population as quickly as possible, to ensure work-requirements are met.

6) Screening Process

Mandatory work-registrant status is determined by decision tables in the Colorado Benefits Management System (CBMS). Status determination is based upon information entered by eligibility technicians for new and renewal applications for SNAP. In counties that operate an Employment First program, the eligibility technician completes the enrollment form *and* provides the appointment letter at the time of application. The technician provides one copy to the participant, retains one for the SNAP case file, and sends one to the Employment First program. In counties that do not operate the program, work-registration is satisfied through signing of the SNAP application alone.

Eligibility technicians determine federal exemptions from work registration based on the data entered into CBMS. Individual exemptions from activities are determined by the Employment First program, after the referral has been completed. Employment First program staff are responsible for working with work-registrants, to ensure compliance with program requirements, or the identification of new exemptions or deferrals, as appropriate.

7) Conciliation Process

When a participant does not comply with mandated work requirements, either Employment First program staff or eligibility technicians may make an initial finding of good cause; final good cause determination is made by the eligibility technician. If good cause is determined, the non-compliance will be stopped. All participants are given the opportunity to complete a compliance activity prior to the disqualification period beginning. If this activity is completed, the non-compliance will be overruled.

8) Disqualification Policy

Upon determination that no good cause can be determined, non-compliance information is entered into CBMS within seven working days of the non-compliance. Eligibility technicians are electronically notified of this information through an automated system alert. The SNAP program notifies the participant via a Notice of Adverse Action (NOAA) of the pending action on their SNAP allotment due to non-compliance; the NOAA is automatically mailed to the participant and is available as an electronic file, accessible by both Employment First program and eligibility staff. After proper notification of non-compliance and NOAA, CBMS will process the disqualification through the batch process.

In Colorado, only the non-compliant participant is disqualified from SNAP for failing to comply with work program requirements; the rest of the household can continue to receive SNAP benefits if eligible. For the first instance of non-compliance, the individual is disqualified from receiving SNAP benefits for one month. For a second occurrence, the individual is disqualified for three months. All subsequent disqualifications are for six months. In all instances, the individual will be disqualified until compliance has been resumed or the individual becomes exempt from participation. Counties have the flexibility to determine their process for participants to resume compliance, with approval by the State. When individuals complete the compliance process, it is entered into CBMS and shared with eligibility. These regulations are outlined in the Code of Colorado Regulations (CCR), Food Assistance Program, 4.310.6 Disqualification Period for Employment First.

ABAWDs who have received two months of SNAP benefits without meeting a work requirement will receive a system-generated Notice of Adverse Action in the third month; if requirements are not met and there is no determination of good cause. In the event the participant does not complete the program requirement prior to the end of the month, the case will be closed before the fourth months of benefits are issued. If the ABAWD does complete the required hours by the end of the third month, benefits will be restored for the fourth month. Each month thereafter, this process is continued to ensure that the ABAWD meets the monthly work requirement, or benefits are suspended. If requirements are not met, SNAP benefits are lost in the next month. If an ABAWD has been disqualified from three months of benefits without meeting the work requirement, the individual must complete 80 hours of an education or work component, or participate in Workfare for a prescribed number of hours within a 30-day time period, in order to regain benefits.

9) Participant Reimbursement

The General Assembly has appropriated \$78,435 in state funds for participant reimbursements for the current state fiscal year, beginning July 1, 2016. Funds are allocated to county human service departments. Participant reimbursement is paid either with those state funds to the degree available, or through local county funds. These expenditures are reimbursed Federally at 50%, up to the state's maximum award. Participants may not be exempted from participating due to insufficient funds for participant reimbursement. Participants will be served to the greatest extent possible; if monthly expenses are anticipated to exceed the E&T

program limits, participation may be exempted or the participant may be placed in other suitable components that fit within available resources.

For transportation, participants generally receive bus tickets or passes to cover the round-trip transit from their home to location where their component is offered. Participants may also receive gas vouchers for the estimated cost of travel and/or bus passes to participate in a program component or make job contacts. Participants are reimbursed for allowable costs including work tools, boots or uniforms for work. Reimbursements may also include clothing for job interviews; school books and course registration fees. Each county is able to identify what they will reimburse and to set their own caps, as funding is limited locally. Items eligible for reimbursement, and county maximums, are submitted through county plans, and approved by the State.

Participant reimbursement funds are allocated to counties based upon the county's share of work-registrant caseload across all Employment First counties; expenditures are tracked at the local and state levels against available allocations on a monthly basis. County expenditures are monitored through the County Financial Management System (CFMS), which is an Oracle platform for financial management of county programs. County expenditure data is invoiced monthly for all Employment First cost categories by the 5th business day of the month. State program and settlement accounting staff then review monthly charges, and direct adjustments as needed, prior to approving reimbursements. County management evaluations and oversight also include reviews of source documentation associated with supportive services, and the mechanisms for distribution to the participants.

10) Work-registration Data

The initial count of work-registrants is provided by the Colorado Benefits Management System, (CBMS) through a work registration status assigned by decision tables for each Food Assistance applicant and recipient. CBMS runs an annual verification of names and social security numbers of all work-registrants in the system on October 1st, which is reported to FNS. Every subsequent month, logic programmed into CBMS runs verification against the list submitted to FNS on Oct, 1 against the work registration codes, social security numbers, and names on the last day of the month. All new work-registrants are tallied throughout the year; duplicated names or social security numbers are not counted again.

11) Outcome Reporting Measures

Many data elements identified through the interim final rule that would amend the SNAP regulations in 7 CFR 273 pertaining to the administration of SNAP Employment & Training programs (Employment First) are currently collected through CBMS. However, other elements are either not available, are incomplete as fields, are not presently mandatory, or are beyond the original scope of system interfaces, and thus will require system changes, system enhancements, or manual requests for data from other systems. Colorado has provided comment through the Federal Register on the challenges and concerns related to each identified measure, as requested by the Food and Nutrition Service. Current reports and reports listed below will be utilized to ensure state systems meet outcome reporting requirements. In addition, Colorado will continue to explore development of other reports as informed by FNS.

- FNS-583 Quarterly Report: Quarterly and annual report that presents all data required for the federal 583 report
- EF Active Client List (bi-weekly): Report by county and case manager of all individuals receiving Food Assistance and having a mandatory work registrant code along with their status in the program (EF-102 Sent, EF-Deferred, EF-Exempt, EF-Sanction, No Plan Status, EF-Active).
- Monthly Activity Report: Provides information for total caseload, number of full-time jobs, full-time average wage, number of part-time jobs, placement rate, number of sanctions, and numbers of individuals beginning components of Education/Training, Workfare 30-day Job Search, Workfare, Working Part-time, and Job Seeking Skills activities. All information is presented by county and statewide.

- ABAWD 1st and 2nd Ticket Report: Lists, by county, social security numbers of all ABAWDs who had a 1st or 2nd ABAWD month posted against them in the current month.
- ABAWD 3rd Ticket Report: Lists, by county, social security numbers of all ABAWDs for whom a 3rd month was posted against them in the current month.
- ABAWD Regain Report: Lists, by county, social security numbers of all ABAWDs who are in their three regain months.
- EF 15% Exempt and Deferred Status Report: Monthly Report, by County and Case manager, of individuals in the 15% Exempt or Deferred status (i.e. mandatory work registrants exempted from EF participation by the case manager).
- EF 18 Report: Monthly list by county of individuals turning 18-years-old in the month who became ABAWDs.
- EF Component Activity Report: Monthly report, by county and case manager, of individuals who started a component or reported hours in a component.
- EF Employment Report: Monthly list, by county and case manager, of individuals reporting employment.
- EF Monthly Caseload Report: Monthly Report of cases that started, closed, or recorded hours during the month, reported by county and case manager.
- EF Turning 6 Report: Monthly list, by county, of households with the youngest child turning 6-years-old.
- EF Workfare Report: Monthly list, by county and case manager, of individuals starting Workfare or reporting Workfare hours.
- EF Exemption report: Details clients who have become exempt from the Employment First program for a given month. The report is broken by client, case manager, county, and exemption reason.

At this time, Colorado does not intend to pursue sampling, but will provide the universe of data across each variable requested. However, as system design changes are further developed, sampling may be reconsidered. To the degree available, Colorado will derive all data from our benefits management system administrative data tables. Other data, such as that requested for quarterly earnings post-exit, or completion of educational components, may require manual extraction from other source systems such as the Department of Labor and Employment, and

Colorado Department of Education's system, and merger with CBMS administrative records by a data analyst.

D. Pledge to Serve All At-Risk ABAWDs

1) Pledge to Serve all At-Risk ABAWDs

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. In FFY 2017, 12 counties of 64 are expected to qualify for an ABAWD waiver under the provisions of 7 CFR 273.24(f) (2). In counties that are waived or can be exempted underneath the State's 15% exemptions, operation of the Employment First program is voluntary. In all other counties, program operation is mandatory. Each county that operates a program must meet the work requirement for ABAWDs, and a qualifying activity will be provided each month for all at-risk ABAWDs who report for services. On-site program reviews are done each year and CBMS reports allow continual state oversight of ABAWD services.

Colorado operates a broad-based program intended to serve every eligible work-registrant, including ABAWDs. Employment First is capable of serving a diverse population of participants in a variety of activities. The system offers an array of resources to help the ABAWD population meet the participation requirements. Education and training components are available for those who benefit from these services. Colorado operates a robust workfare program, and through these "internship" opportunities, enables many ABAWDs to meet federal work requirements at a reduced number of hours, while providing recent work history and contextualized job training.

Colorado uses the "fixed" clock method of measuring the three-year period for the ABAWD time limit. The current ABAWD three year clock will end on September 30, 2016 and will be reset with a new clock on October 1, 2016. All ABAWDs in Colorado will begin with a new 36-month clock on October 1, 2016 with no countable months or any ABAWD disqualifications in place.

2) Size & Need of ABAWD Population

Many ABAWDs in Colorado present with significant challenges in attaching to employment including, 1) lack of a high school diploma or its equivalent, 2) no significant/relevant work history, 3) felony convictions, 4) substance abuse, 5) mental and physical health problems, 6) housing problems, and 7) transportation problems. Among the ABAWD population, the following issues are proportionately higher: 1) recent incarceration, 2) lack of a permanent address and/or homelessness, and 3) health problems.

Based upon guidance issued by FNS in the fall of 2015, Colorado is pursuing an expanded definition of physically or mentally unfit for work, that includes chronic homelessness. This proposed change to Colorado's regulations would allow for increased exemptions of ABAWDs dealing with homelessness, and the shoring up of E&T resources for those who stand to benefit from them most. It is projected that this change will be implemented within the first quarter of FFY17.

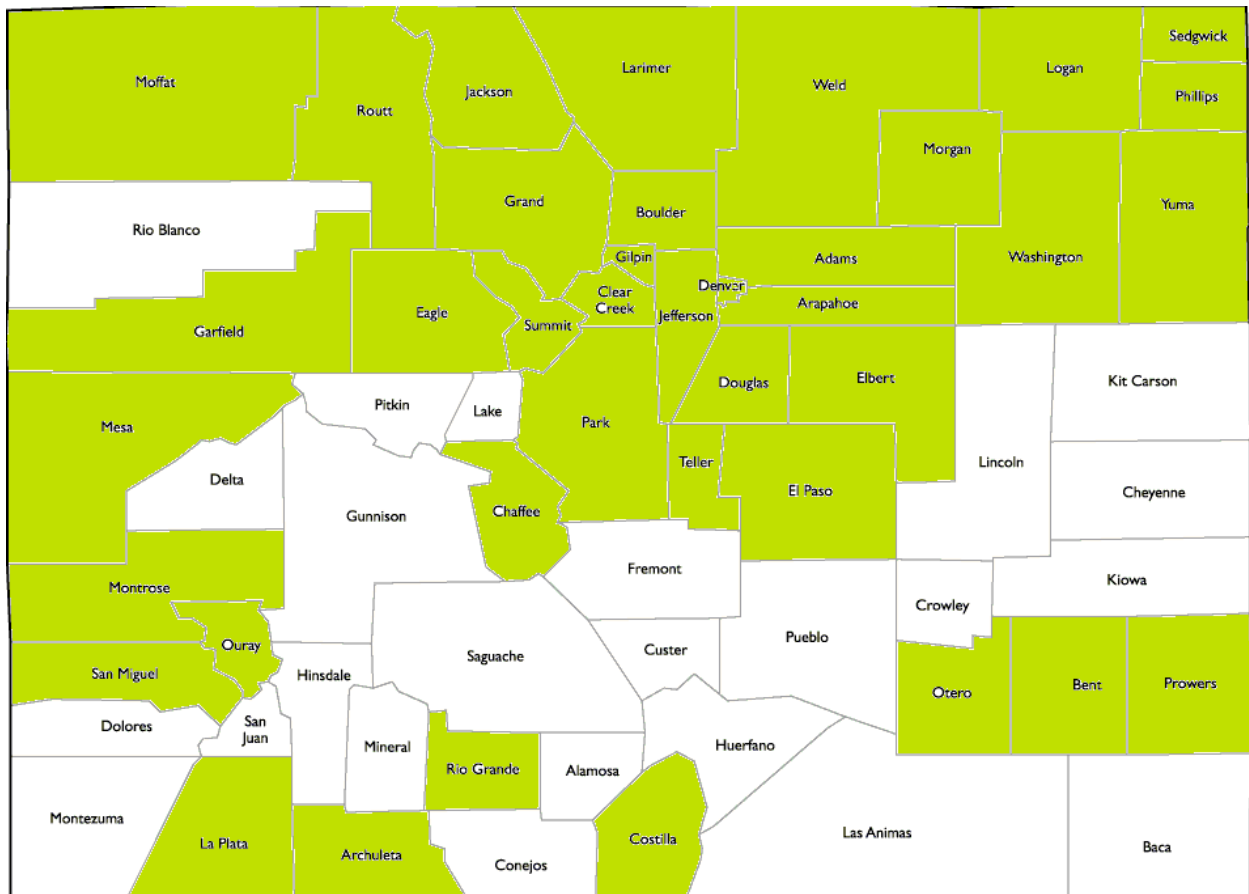
The expansion of Colorado's Medicaid eligibility through implementation of the Affordable Care Act mitigated some of the acute medical problems resulting from homelessness and substance abuse, and provided much-needed resources to ensure medical care and treatment as warranted. However, ongoing health issues resulting from long-term, strenuous physical labor can be problematic for many older adults. These individuals, while not meeting disability criteria, are nonetheless highly unlikely to successfully find work in their previous occupations, where the need for physical strength and stamina is requisite. Colorado has found that these individuals may benefit considerably from exposure to other types of work through workfare sites, particularly those that combine training with work experience. Colorado regulations allow for individual use of 15% exemption slots based upon established criteria, at county determination. Situations which may justify an exemption include: lack of transportation, a pending legal action, non-English speaking, serious lack of job readiness/employability, job attached (60 day exemption), lives more than one hour away from the EF office, transitional living situation including domestic violence shelters, mental health concerns (documented), working part-time at maximum capacity, child care problems interfere with availability for work, already doing mandatory community service work for another agency, or sex offender restrictions.

The ABAWD population served in Colorado is totaled approximately 41,276 individuals referred for service during FFY 2016. As 5 counties (Montezuma, Dolores, Fremont, Pueblo and Kit

Carson) will be standing down programs in FFY 17 (utilizing waivers or 15% exemptions to protect impacted ABAWDs) we expect that number to decrease slightly in FFY 2017, to an estimate of 38,336 distinct ABAWDs.

3) Geographic Areas

Colorado will operate the Employment First program in the following counties, shaded below in green: Adams, Arapahoe, Archuleta, Bent, Boulder, Broomfield, Chaffee, Clear Creek, Costilla, Denver, Douglas, Eagle, Elbert, El Paso, Garfield, Gilpin, Grand, Jackson, Jefferson, La Plata, Larimer, Logan, Mesa, Moffat, Montrose, Morgan, Otero, Ouray, Park, Phillips, Prowers, Rio Grande, Routt, San Miguel, Sedgwick, Summit, Teller, Washington, Weld and Yuma.



4) Estimated Cost to Fulfill Need

Colorado's Employment First program is structured to ensure all ABAWDs are provided with an opportunity to meet the work requirements, primarily through engagement in a workfare component. However, additional resources made available through ABAWD Pledge Funds help support more robust and individualized programming for ABAWDs, including the provision of training for in-demand occupations. The foundational element of workfare ensures Colorado is able to meet the Pledge; the elastic and responsive program is then able to offer additional services as resources allow. Because the amount of Pledge funding varies, the cost of operating the program is based upon a workfare model, and increases as funding allows.

5) Description of State Agency Capacity

As a county-administered state, human services are available in all 64 counties across Colorado, through at least one physical office. County-level administration allows for a high degree of community integration, and strategies tailored to local economies, capacity, and need. Colorado's counties are well-equipped to support at-risk ABAWDs in all counties making the ABAWD Pledge, through access to at least one qualifying component.

To address the transitory nature of both the ABAWD and non-ABAWD work registrant population, the Employment First program starts participants in a program component within two weeks of being determined a mandatory participant. This ensures the State is engaging at risk ABAWDs as early as possible, and fulfills the pledge to serve at-risk ABAWDs, ideally mitigating the likelihood that they become "at-risk".

6) Management Controls

Colorado carefully tracks ABAWDs in all areas that do not meet federal waiver criteria or are not under a county-wide 15% exemption. As a mandatory state for all work-registrants, including ABAWDs, Colorado is able to identify and serve work-registrants immediately upon SNAP certification. Through immediate referral to the Employment First program, and the ability to impose occurrence-level sanctions for those that do not engage with the program within required timeframes, the Employment First program is well-equipped to quickly identify and track ABAWDs statewide.

The Colorado Benefits Management System, (CBMS) has management controls built into the system to ensure county supervisors and the state office are able to monitor and ensure

individuals are being scheduled for activities to meet the work requirement. Every month, CBMS generates a list (by county) of ABAWDs who used 1, 2, or 3 of their countable months; the system also creates the disqualification for the month following the 3rd countable month. Ongoing monitoring of these reports is performed at both the county- and state-level.

Additional monthly reports have been created to help identify and schedule ABAWDs for service as soon as possible. These reports include a list (by county) of households wherein the youngest member will be turning 18 the following month, potentially changing the status of household members from non-ABAWD to ABAWD. County offices are also provided a bi-monthly report of individuals receiving Food Assistance who are identified as work-registered mandatory ABAWDs, but for whom a plan is not currently in place. This report facilitates proactive outreach by Employment First staff to those individuals with a current open E&T case, in order to contact them to schedule an appointment. The following reports are available through CBMS for oversight and quality assurance related to ensuring service to ABAWDs:

- FNS-583 Quarterly Report: Quarterly and annual report that presents all data required for the federal 583 report
- EF Active Client List (bi-weekly): Report by county and case manager of all individuals receiving Food Assistance and having a mandatory work registrant code along with their status in the program (EF-102 Sent, EF-Deferred, EF-Exempt, EF-Sanction, No Plan Status, EF-Active).
- Monthly Activity Report: Provides information for total caseload, number of full-time jobs, full-time average wage, number of part-time jobs, placement rate, number of sanctions, and numbers of individuals beginning components of Education/Training, Workfare 30-day Job Search, Workfare, Working Part-time, and Job Seeking Skills activities. All information is presented by county and statewide.
- ABAWD 1st and 2nd Ticket Report: Lists, by county, social security numbers of all ABAWDs who had a 1st or 2nd ABAWD month posted against them in the current month.
- ABAWD 3rd Ticket Report: Lists, by county, social security numbers of all ABAWDs for whom a 3rd month was posted against them in the current month.
- ABAWD Regain Report: Lists, by county, social security numbers of all ABAWDs who are in their three regain months.

- EF 15% Exempt and Deferred Status Report: Monthly Report, by County and Case manager, of individuals in the 15% Exempt or Deferred status (i.e. mandatory work registrants exempted from EF participation by the case manager).
- EF 18 Report: Monthly list by county of individuals turning 18-years-old in the month who became ABAWDs.
- EF Component Activity Report: Monthly report, by county and case manager, of individuals who started a component or reported hours in a component.
- EF Employment Report: Monthly list, by county and case manager, of individuals reporting employment.
- EF Monthly Caseload Report: Monthly Report of cases that started, closed, or recorded hours during the month, reported by county and case manager.
- EF Turning 6 Report: Monthly list, by county, of households with the youngest child turning 6-years-old.
- EF Workfare Report: Monthly list, by county and case manager, of individuals starting Workfare or reporting Workfare hours.
- EF Exemption report: Details clients who have become exempt from the Employment First program for a given month. The report is broken by client, case manager, county, and exemption reason.

7) Description of Components Offered

a) Workfare 30-Day Job Search

In the 30-day period commencing with referral to Employment First, individuals are required at minimum to 1) attend an orientation/assessment meeting where they may also complete a workfare screening activity; 2) attend four to six hours of job search skills training; and 3) complete an 8 hour course of Soft Skills training. Additional requirements (e.g. job contacts) may be included depending on the individual's circumstances. After the 30 day period, participants may select from a current network of workfare sites or opt for a self-identified site and be placed at the site for ongoing workfare.

b) Workfare

Participants are required to work a specific number of hours each month (not to exceed the household monthly food assistance allotment divided by the state minimum wage of

\$8.31/hour) at a public or private non-profit work site, not to exceed 30 hours per week. Individuals with significant barriers or other needs determined by their assessment may be referred to another program or component instead of being placed on a workfare site.

c) Self-Initiated Workfare

Self-initiated workfare includes the same requirements as workfare; a participant must work a specified number of hours at a worksite to satisfy the ABAWD work requirement. The required hours are determined in the same manner as workfare, and are not to exceed 30 hours per week. The sole distinction is that through self-initiated workfare, the participant voluntarily finds his/her own work assignment and arranges to have participation reported to the Employment First program. Self-initiated workfare is an option to allow for more flexibility to ABAWDs. In the event that a county does not have an existing site agreement where a participant would like to perform their workfare activity, they are able to opt for a self-initiated site. Additionally, if an ABAWD in or 15% exempt county choose to participate they may opt to self-initiate a workfare site.

d) Work Experience

Work Experience is comparable to workfare, however, job experience may be provided in the private sector, in comparable working conditions as paid employees. Participation hours are determined by the food assistance allotment divided by the state minimum wage up, not to exceed 30 hours per week.

e) Job Retention

Job Retention provides supportive services for up to 90 days to participants who have secured employment. Participants can be reimbursed for expenditures directly related to maintaining employment. Typical job retention reimbursements include clothing, equipment or tools, relocation expenses, transportation and childcare.

The cap for job retention support is the available supportive services monies that is set at the county level, but often carries the distinction that the dollar amount can be overridden by supervisor authorization dependent on participant need. Job retention supports can be provided for up to 90 days to participants who have secured employment, and participants can be reimbursed for expenditures directly related to maintaining employment. Typical job

retention reimbursements include clothing, equipment, tools, relocation expenses, transportation and childcare.

The state does not set a cap, as this is 50/50 county money; however, there is an overall state target cap that is set based on the projected reimbursement level provided by FNS.

f) All Other Components (Additional Options)

A variety of additional components are available to ABAWDs to satisfy the work requirement. Federal law requires participation of at least 20 hours per week to meet the work requirement; nine of those hours may be comprised of job contacts when combined with other components. Additional components (excluding Workfare 30-Day Job Search) can be combined in order to meet the ABAWD work requirement, as follows:

- English as a Second Language
- Vocational Rehabilitation
- Basic Skills/Adult Basic Education
- GED preparation
- Post-Secondary Education
- Employability Services
- WIOA activities
- Vocational Training
- Literacy instruction
- Entrepreneurship
- Work

Employment First program components for non-ABAWDs are the same as for ABAWDs. Workfare required hours are determined in the same manner for non-ABAWD and ABAWD households alike (SNAP allotment divided by the state minimum wage). All Employment First participants begin the process by attending orientation and completing an assessment; most counties include a one-hour work assignment at the local office in conjunction with the assessment, as a first step in the workfare component. Participants are assigned to complete a series of job search competencies, which can be done individually or as part of a 4-6 hour job seeking skills class. Participants may also receive 8 hours of Soft Skills Training to complete the 30-Day Workfare Job Search component.

E. E&T Component Detail (Substitute for County-run Programs)

Table 2: E&T Component Detail

All E&T Components are available statewide in counties that are not otherwise exempted, and services are not targeted to specific cohorts, but are based upon individualized plans and suitability. Education costs are not charged to the E&T program; however, qualifying expenditures may be identified for 50% federal reimbursement.

Component	Description	Annual Count	Annual Cost	Provider	Reporting Measures
Workfare 30-Day Job Search	Orientation/assessment, workfare screening activity, job seeking skills and soft skills instruction	20,952	\$7,764,572	In-house	% of participants to gain employment
Workfare	Specified number of hours worked at a private non-profit or public organization	4,253	\$1,576,262	Public or private non-profit organization	% of participants to gain employment
Self-Initiated Workfare	Specified number of hours worked at a private non-profit or public organization as selected by participant	29	\$10,747	Determined by participant	<100
Work Experience	Specified number of hours worked at a private organization	0	0	For-profit organization	<100
Job Retention	Supportive services up to 90 days post-employment	0	0	In-house	<100
Employability Services	Basic/soft skill instruction that meets the ABAWD work requirement	201	\$74,488	Aztec Ready to Work Workbooks	% of participants to gain employment
Entrepreneurship	Self-employment instruction	0	0	Workforce Development	<100

ESL	English language instruction	35	\$12,970	Local education providers	<100
GED Prep	Preparation for the General Equivalency Diploma examination	108	\$40,023	Local education providers	% of individuals to gain GED
Adult Basic Education	Pre-GED basic skills education	11	\$4,076	Local education providers	<100
Vocational Rehabilitation	Vocational training for those with disabilities preventing employment	2	\$741	State Vocational Rehabilitation	<100
Post-secondary Education	Education beyond high school insufficient to meet exemption standards	365	\$135,264	Local education providers	% of individuals to gain credential
Literacy	Participants who require basic literacy education	2	\$741	Local education providers	<100
WIOA	Workforce-based training for qualifying participants	4	\$1481	Workforce development one-stops	<100
Vocational training	Job-based training for qualifying participants	35	\$12,970	Vocational training providers	<100

F. Estimated Participation Levels

Table 3: Estimated Participation Levels

A.	Anticipated number of work-registrants in the State during the FFY (unduplicated count)	162,118
B.	Total number of planned state option exemptions from E&T participation	20,480
	State option exemption categories	
	1. Residing in a county w/o an E&T program	6,000
	2. Lack of transportation	300
	3. Pending legal action	100
	4. Non-English speaking	1,000
	5. Serious lack of job readiness/employability	6,000
	6. Job attached (60 days)	300
	7. Lives more than 1 hour from EF office	1,500
	8. Transitional living, including DV shelter	300
	9. Working part-time at max capacity	2,800
	10. Child care issues	2,000
	11. Performing mandatory community service for another agency	500
	12. Sex offender restrictions	400
C.	Percent of work-registrants exempt from E&T	12.6%
D.	Anticipated number of E&T mandatory participants	141,638
E.	Anticipated number of voluntary E&T participants	0
F.	Anticipated number of ABAWDs in the state during FFY	38,336
G.	Anticipated number of ABAWDs in waived areas	4,112
H.	Anticipated number of ABAWDs 15% exempted	3,600

I.	Number of potential at-risk ABAWDs expected during the FFY	30,624
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G. Partnership/Contracts

Table 4: Partnerships/Contracts

The State of Colorado will explore implementing contracts with 3rd party agencies to enhance employment opportunities in FFY 2017. Discussions are taking place with Community College of Aurora (CCA). The state must approve partnerships established at the county level No individual county receives more than 10% of the E&T operating budget.

H. Contractor Detail Addendum

N/A

I. Operating Budget and Budget Narrative

Table 5: State Operating Budget

	<i>State Cost</i>	<i>Federal Cost</i>	<i>Total</i>
<i>I. State Direct Costs</i>			
1110 - Statutory Personnel System - Regular Employee Wages	\$ 72,891	\$ 217,289	\$ 290,181
1120 - Statutory Personnel System - Temporary Employee Wages	\$ 294	\$ 10,163	\$ 10,457
1210 - Contractual Employee - Regular	\$ 2,608	\$ 2,608	\$ 5,215

Employee Wages			
1510 - Statutory Personnel and Payroll - Group Insurance	\$ 8,815	\$ 34,245	\$ 43,060
1520 - Statutory Personnel and Payroll - Retirement Contributions	\$ 14,891	\$ 44,581	\$ 59,472
1530 - Statutory Personnel and Payroll - Other Employee Benefits	\$ 1,120	\$ 3,816	\$ 4,936
1910 - Personal Services Purchased Services	\$ -	\$ 584	\$ 584
2210 - Maintenance and Repair Services	\$ 75	\$ 247,001	\$ 247,076
2250 - Rentals	\$ -	\$ 6,466	\$ 6,466
2510 - In-State Travel	\$ -	\$ 17,643	\$ 17,643
2630 - Communications	\$ 2,733	\$ 2,878	\$ 5,611
2660 - Insurance, Other Than Employee Benefits	\$ 337	\$ 1,175	\$ 1,512
2680 - Printing and Reproduction	\$ -	\$ 368	\$ 368
2810 - Other Purchased Services	\$ -	\$ 8,750	\$ 8,750
3110 - Supplies and Materials	\$ 33	\$ 33	\$ 66
3210 - Office Supplies	\$ -	\$ 3,347	\$ 3,347
3230 - Postage	\$ 13	\$ 32	\$ 45
3300 - Noncapitalizable -	\$ -	\$ 25	\$ 25

Information Technology			
4170 - Miscellaneous Fees and Fines	\$ -	\$ 107	\$ 107
4180 - Official Functions/Customer Workshops	\$ -	\$ 3	\$ 3
4220 - Employee Training	\$ -	\$ 875	\$ 875
5880 - Distributions to Nongovernmental Organizations	\$ 14,200	\$ 14,200	\$ 28,400
7300 - Operating Transfer Indirect Costs	\$ 28,814	\$ 54,046	\$ 82,860
Total Direct Costs	\$118,010.27	\$616,188.17	\$734,198.43
II. Indirect Costs			
Actual rate, 1.5%	\$ 28,814	\$ 54,046	\$ 82,860
III. In-Kind Contribution			
6000 - In-Kind Match	\$ 43,223	\$ 43,223	\$ 86,446
IV. Participant Reimbursement			
a) Dependent care	\$0	\$0	\$0
b) Transportation & other	Reimbursed at the federal reimbursement rate	Reimbursed at the federal reimbursement rate	Reimbursed at the federal reimbursement rate
c) SA cost for dependent care services	\$0	\$0	\$0
V. Total Costs	\$190,047.09	\$713,456.99	\$903,504.07

J. Budget Narrative and Justification

[Narrative in lieu of Table 6: Budget Narrative and Justification Table]

1. Direct Costs

State direct costs are provided across identified cost categories, based upon state object code.

a. Salary/Wages

Total represents FFY 16 actuals, as approximation for FFY 17 costs. 5 FTE @ 100%, as well as 2 FTE @ 50%. Pro-rata costs to Director and Executive staff and Department support staff.

b. Fringe

Fringe includes group insurance, retirement contributions, and other employee benefits. Represents FFY 16 actuals, 35% of salary/wages.

c. Contractual Costs

Contract costs do not include intergovernmental grants to county human service agencies; no other contractual costs are anticipated for FFY 17.

d. Non-capital Equipment and Supplies

Computer leases, technical equipment, office supplies, etc. for 5 FTE, and pro-rata share of costs for .5 and .5 FTE.

e. Materials

Postage, supplies, printing and reproduction, miscellaneous fees.

f. Travel & Staff Training

In-state travel to support 40 counties, including TA and monitoring.

- g. Building/Space**
- h. Equipment & Other Capital Expenditures**

2. Indirect Costs

The Colorado Department of Human Services does not use an indirect cost rate, but charges actual costs based upon Federal approval. An approximate rate based upon historic actuals has been provided for the purposes of this budget.

3. State In-Kind Contributions

4. Participant Reimbursements

a. Dependent Care

The State does not contribute to dependent care costs for participants.

b. Transportation & Other Costs

The State contributes \$78,435 in General Fund appropriations toward participant reimbursements for transportation and other cost. These funds are allocated to counties for utilization.

c. State Agency Cost for Dependent Care Services

N/A

Table 7: Summary of Federal FY Costs

Funding Category	Approved FFY 16 Budget	FFY 17 Planned Budget
1. 100% Federal E&T Grant	\$2,973,196	\$1,106,706
2. ABAWD Grant	\$2,302,158	\$849,598
3. Additional E&T Administrative Expenditures		
a. 50% Federal	\$2,068,897	\$4,269,269
b. 50% State	\$2,068,897	\$4,269,269
4. Participant Expenses		

a. Transportation/Other		
50% Federal	\$225,759	\$624,738
50% State	\$225,759	\$624,738
b. Dependent Care		
50% Federal	\$250	\$0
50% State	\$250	\$0
5. Total E&T Program Costs (1+2+3a+4b+4a+4b)	\$9,865,166	
6. 100% SA Cost for Dependent Care	\$0	
7. Total Planned FFY Costs	\$9,865,166	\$10,894,720
8. Optional Workfare	\$2,351,722	\$2,351,722

K. County Cost Table

County	County Administration	Contractors	# of Contracts	Participant Reimbursements	Total Budget
Adams	\$907,995		0	\$139,453	\$1,047,448
Arapahoe		\$843,432	1	\$135,723	\$979,155
Archuleta		\$21,822	1	\$3,124	\$24,946
Bent	\$41,423		0	\$3,528	\$44,951
Boulder		\$302,524	1	\$42,630	\$345,154
Broomfield	\$40,697		0	\$5,373	\$46,070
Chaffee	\$30,705		0	\$4,411	\$35,116
Clear Creek	28,695		0	\$2,380	\$31,075
Costilla	\$48,506		0	\$3,962	\$4,011
Denver	\$1,653,610		0	\$250,365	\$1,903,975
Douglas		\$191,296	1	\$16,523	\$207,819
Eagle	\$38,079		0	\$3,031	\$41,110
Elbert	\$37,685		0	\$3,241	\$40,926
El Paso		\$1,499,961	1	\$227,010	\$1,726,971

Garfield	\$152,866		0	\$12,289	\$165,155
Gilpin	\$18,536		0	\$1,589	\$20,125
Grand	\$24,581		0	\$2,101	\$26,682
Jackson	\$4,311		0	\$387	\$4,698
Jefferson	\$716,792		0	\$102,932	\$819,724
La Plata		\$78,614	1	\$11,367	\$89,981
Larimer		\$415,890	1	\$67,683	\$483,573
Logan	\$57,820		0	\$6,552	\$64,372
Mesa		\$415,890	1	\$57,383	\$473,273
Moffat	\$57,820		0	\$4,776	\$62,596
Montrose	\$108,801		0	\$15,833	\$124,634
Morgan	\$50,778		0	\$7,854	\$58,632
Otero	\$153,445		0	\$13,452	\$166,897
Ouray	\$6,147		0	\$837	\$6,984
Park	\$52,649		0	\$4,404	\$57,053
Phillips	\$13,369		0	\$1,186	\$14,555
Prowers	\$93,147		0	\$7,893	\$101,040
Rio Grande	\$46,232		0	\$7,056	\$53,288

Routt	\$40,512		0	\$3,497	\$44,009
San Miguel	\$7,834		0	\$1,046	\$8,880
Sedgwick	\$6,153		0	\$1,031	\$7,184
Summit	\$33,393		0	\$2,163	\$35,556
Teller	\$55,206		0	\$4,342	\$59,548
Washington	\$7,796		0	\$1,116	\$8,912
Weld	\$471,672		0	\$67,737	\$539,409
Yuma	\$13,513		0	\$2,217	\$15,730
TOTAL	\$4,972,311	\$3,769,429		\$1,249,477	\$9,991,217