

COUNTY OF LOS ANGELES

Family and Social Services

FESIA A. DAVENPORT
Chief Executive Officer



DATE: Wednesday, April 21, 2021
TIME: 2:00 PM Public Meeting

DUE TO THE CLOSURE OF ALL COUNTY BUILDINGS, MEETING PARTICIPANTS AND MEMBERS OF THE PUBLIC WILL NEED TO CALL IN TO PARTICIPATE:

Teleconference Call-In Number: (323) 776-6996/ Conference ID: 599 009 090#

AGENDA

Members of the Public may address agenda item. Two (2) minutes are allowed for each item.

I. NOTICE OF CLOSED SESSION

CS-1 CONFERENCE WITH LEGAL COUNSEL – Existing Litigation
Government Code Section 54956.9, subdivision (d)(1)
Tillman v. County of Los Angeles
Department of Children and Family Services **1:30 PM**

CS-2 CONFERENCE WITH LEGAL COUNSEL – Anticipated Litigation
Government Code Section 54956.9, subdivision (d)(2)
Department of Children and Family Services **2:30 PM**

II. Call to Order

III. **Presentation/Discussion Items:**

a. **Workforce Development, Aging and Community Services/ Department of Public Social Services:** Recommendation for Delegated Authority to Execute Sole Source Subawards for the County's CalFresh Employment and Training Expansion Pilot Program

IV. Items continued from a previous meeting of the Board of Supervisors or from a previous FSS Agenda Review meeting.

V. Public Comment

VI. Adjournment



May 4, 2021

BOARD OF SUPERVISORS

- Hilda L. Solis
- Holly J. Mitchell
- Sheila Kuehl
- Janice Hahn
- Kathryn Barger

The Honorable Board of Supervisors
 County of Los Angeles
 383 Kenneth Hahn Hall of Administration
 500 West Temple Street
 Los Angeles, CA 90012

Dear Supervisors:

EXECUTIVE LEADERSHIP

- Otto Solórzano
Acting Director
- Paul Goldman
Contract & Administrative Services
- Jose R. Perez
Workforce Development
- Lorenza C. Sánchez
Aging & Adult Services
- Robin S. Toma
Human Relations

RECOMMENDATION FOR DELEGATED AUTHORITY TO EXECUTE SOLE SOURCE SUBAWARDS FOR THE COUNTY’S CALFRESH EMPLOYMENT AND TRAINING EXPANSION PILOT PROGRAM

(ALL SUPERVISORIAL DISTRICTS) (3 VOTES)

SUBJECT

County of Los Angeles (“County”) Workforce Development, Aging and Community Services (“WDACS”) seeks approval to enter into sole source Subawards with three organizations – Goodwill Industries Southern California (“Goodwill”), the Chrysalis Center (“Chrysalis”), and the Roberts Enterprise Development Fund (“REDF”) - to provide services under the Los Angeles County Department of Public Social Services (“DPSS”) and WDACS’ CalFresh Employment and Training (“CFET”) Expansion Pilot Program (“CEPP”). CEPP is one of several statewide efforts underway to engage with third-party partnering agencies to provide CFET services to CalFresh participants. The approval of the sole source Subawards will allow the organizations to provide workforce-related services, technical assistance, and training/preparation to populations that face barriers to employment, such as individuals experiencing homelessness, foster youth, and justice-involved individuals. These Subawards consist of new funding from the United States Department of Agriculture (“USDA”) Food and Nutrition Service (“FNS”), which is leveraged by partnering agencies’ own non-federal funding resources. The federal funding is passed through the California Department of Social Services to DPSS and then to WDACS, at no additional cost to the County.

CONTACT INFORMATION

3175 West Sixth Street
 Los Angeles, CA 90020
 WDACS (888-211-0644)
 APS hotline (1-877-477-3646)
 info@wdacs.lacounty.gov
 WDACS.LACOUNTY.GOV



IT IS RECOMMENDED THAT THE BOARD:

1. Approve and authorize WDACS' Acting Director, or designee, to enter into sole source Subawards with Chrysalis, Goodwill, and REDF to provide CFET services for an initial one year term from May 2021 through May 2022, at \$538,113, \$601,430, and \$123,750 respectively, for a total program annual sum of \$1,263,293, with the option to extend the Subawards for four (4) additional one year terms (not to exceed five years) upon approval from DPSS and inclusion in a State CFET Plan.
2. Approve and authorize WDACS' Acting Director, or designee, to work with DPSS to execute sole source Subawards with additional eligible providers during the next five (5) years provided that: (a) such agencies meet CFET program requirements, have the administrative capacity to operate a CFET program, and can provide sustainable, qualified funds from allowable non-federal funding sources to spend on eligible participants for allowable activities; (b) WDACS obtains County Counsel approval as to form; and (c) WDACS notifies the Board in writing within 30 business days after execution.
3. Approve and authorize WDACS' Acting Director, or designee, to execute amendments with Subrecipients as follows: 1) add new, relevant or updated federal, State and/or County Subaward terms; and 2) increase or decrease the Subaward amounts that may exceed 10% based on the availability of funds and/or based on Subrecipient's performance provided that: (a) the total allocation does not exceed available funding; and b) WDACS obtains County Counsel approval as to form of the amendment prior to any such amendment. These actions will ensure expenditure of CEPP funds and is consistent with your Board's policy of requiring review of each service provider's performance. WDACS shall provide written confirmation to the CEO within thirty (30) working days of executing such amendments.
4. Approve and authorize WDACS' Acting Director, or designee, to suspend or terminate Subawards on behalf of the County in accordance with the applicable provisions in the respective Subaward. The approval of County Counsel as to form will be obtained prior to executing suspensions or terminations. The Acting Director of WDACS will notify the Board at least ten (10) days in advance of executing terminations.

PURPOSE/JUSTIFICATION OF RECOMMENDED ACTIONS

On February 28, 2017, the County of Los Angeles Board of Supervisors ("Board") approved a motion requesting the creation of a County Alignment Plan to encourage alignment between the County's various workforce development programs and maximize services to workers and jobseekers, especially those with significant barriers to employment. On July 25, 2017, following the review of a July 14, 2017 response to the February motion, the Board further instructed DPSS and WDACS to develop, to the extent possible under federal, State, and local laws, a plan for increasing CFET funds to expand workforce development services across the County, including to General Relief participants through the County's America's Job Centers of California ("AJCCs"). After exploring

several opportunities, WDACS and DPSS identified a strategy to leverage CFET and expand and align workforce development services across the County.

The requested actions will allow DPSS/WDACS to:

1. Further support the alignment of workforce development service delivery across the County.
2. Allow DPSS and WDACS to expand service delivery to communities within the County by increasing the capacity of our service providers.
3. Leverage federal funding in the County to deliver workforce development services to DPSS/WDACS' shared participants and expand CalFresh access through its existing employment and training infrastructure, as directed by the Board.
4. Comply with the intent of California AB 415, which encourages CFET counties to partner with Social Enterprises ("SEs"). SEs are competitive, revenue-generating businesses with a social mission that have access to non-federal funding that can be invested in providing CFET.
5. Comply with a statewide effort to align CFET with State and local Workforce Innovation and Opportunity Act ("WIOA") activities and help meet WIOA policy objectives such as fostering demand-driven skills attainment, enabling upward mobility for all Californians, and aligning, coordinating, and integrating programs and services.
6. Allow the County to draw down up to \$1,263,293 (first program year) in federal reimbursement funds for SEs for the delivery of services to communities most in need.

CFET allows states to be reimbursed from the FNS for 50 percent of eligible funds (typically non-federal funds) spent on employment, training, and related supportive services to CalFresh participants. A way for a county to leverage these "50/50" funds is by partnering with third-party providers that use their own non-federal funding to deliver services and receive a partial reimbursement. WDACS and DPSS are partnering with Goodwill, Chrysalis, and REDF to implement the CEPP, which is the first third-party partnership program to be offered under CFET in the County. The pilot phase will last at least one year, during which WDACS and DPSS will continually improve operational protocols and assess the extent to which services are being provided and eligible funds leveraged.

To implement CEPP, WDACS and DPSS must select providers that meet criteria tied to federal CFET funding, which include serving CalFresh eligible participants, providing eligible employment and training services, availability of eligible funding that can be leveraged, and sufficient administrative capacity. Doing so will enable WDACS and DPSS to ensure compliance with Federal and State requirements and provide the conduit to draw down FNS funds. Accordingly, during the initial pilot phase, WDACS and DPSS sought to identify service providers that meet the four (4) conditions above from among the three (3) SEs that currently participate in the County's LA:RISE program, which provides supported employment services through SEs to individuals experiencing homelessness. WDACS and DPSS limited the initial pilot phase to SEs part of LA:RISE because these agencies are the only known pool of providers that meet all conditions identified above.

To ensure the three (3) SEs meet the criteria tied to federal CFET funding and have sufficient capacity, WDACS and DPSS evaluated the SEs based on budget size (at least \$2 million in overall

SE expenses), qualified agency funds available for leveraging, quality of direct services, low-income participants likely eligible for CalFresh, and ability to meet deliverables. WDACS and DPSS also surveyed the SEs to assess their interest and capacity for participation. Based on these criteria, WDACS identified Goodwill and Chrysalis for the initial pilot phase. The third SE decided not to participate in the initial pilot phase.

After considering the results of the initial pilot success (increased revenue through CEPP reimbursement), WDACS plans to work with DPSS to expand CFET services to additional community-based organizations (“CBOs”) and AJCCs across the County that meet the CFET/CEPP qualifying criteria. FNS is planning to expand eligible services under CFET to include subsidized employment; in addition, WDACS and DPSS hope to identify additional local funds beyond Measure H that can be leveraged through CFET. As eligible activities and local funding increases, it will enable WDACS to increase the pool of participating agencies that qualify. WDACS will submit a Memo updating the Board on the initial pilot phase and plans for future expansion of the CEPP.

WDACS also intends to enter into a sole source subaward with REDF to enable the County to seek federal reimbursement for eligible activities REDF performs in its role as the CEPP technical assistance provider. REDF was previously selected as the technical assistance provider through a competitive Request for Proposals released on December 13, 2020. The current request in this letter is to issue a sole source Subaward with REDF for the sole purpose of CEPP reimbursement.

IMPLEMENTATION OF STRATEGIC PLAN GOALS

The recommended action supports Countywide Strategic Plan *Goal 1: Make Investments that Transform Lives* by supporting job readiness and increasing employment opportunities; and Strategic Plan *Goal 2: Foster Vibrant and Resilient Communities* by aligning workforce development programs to increase employability of high-need, priority populations.

FISCAL IMPACT/FINANCING

The maximum Subaward amount for the first program year is \$1,263,293. The maximum annual amount for each Subrecipient for one year is \$538,113 for Chrysalis, \$601,430 for Goodwill, and \$123,750 for REDF, respectively. Should WDACS exercise all four one-year optional extensions, the estimated Subaward total for the initial year and the extensions is \$6,316,460. CEPP is funded by the USDA’s CFET (Assistance Listing Number 10.561) funds, which leverage existing qualified agency non-federal funds from WDACS (including City of Los Angeles and County Measure H funds, Youth Services Net County Costs funds, and State INVEST funds), Chrysalis (including City and County Measure H funds, County Brilliant Corners funds, event revenue, philanthropic and corporate grants, individual donations, and Chrysalis general fund/earned revenue), Goodwill (including County Measure H funds, County Youth@Work funds, State INVEST funds, philanthropic and corporate grants, and Goodwill general funds/earned revenue), and REDF (including philanthropic and individual donor funds). DPSS will reimburse WDACS for eligible CFET costs with CFET federal funds. The USDA funds are included in DPSS’s Fiscal Year (“FY”) 20-21 budget.

Funding for future FYs will be included each Department's annual budget request. There is no impact on County General Funds.

FACTS AND PROVISIONS/LEGAL REQUIREMENTS

WDACS will administer CEPP in accordance with the Federal Supplemental Nutrition Assistance Program Employment & Training Guidance (7 Code of Federal Regulations (Part 273.7 and 277)), State CDSS Manual of Policies and Procedures ("MPP") (Division 63, Section 63-407), and Section 4005 of the Agriculture Improvement Act of 2018 (PL 115-334), which was enacted on December 20, 2018. CFET endeavors to help CalFresh participants gain the skills and credentials they need to obtain good jobs leading to economic self-sufficiency.

Counties that wish to participate in CFET are required to submit an annual plan to CDSS for approval. CDSS then compiles all County plans into a California CFET Plan, which is submitted to FNS each year for approval. CDSS and FNS have approved the County's federal FY 2020 CFET Plan, which includes the CEPP.

The Subawards will not result in the unauthorized disclosure of confidential information and will be in full compliance with federal, State, and County regulations and requirements.

All Subrecipients, current and prospective, are, and will be, in compliance with all Board, CEO, and County Counsel requirements.

CONTRACTING PROCESS

The USDA FNS allows states and counties to enter into Subawards governed by state and local procurement regulations where a third-party provider can share in the cost of providing employment and training services to CalFresh recipients. By entering into sole source Subawards with third-party providers, the provision of CFET services is streamlined and fully leveraged. Consistent with the Board's policy on sole source contracts (Board Policy 5.100), WDACS has included a completed sole source checklist approved by the CEO with this Board Letter (Attachment). DPSS and WDACS will also establish departmental Memorandums of Understanding ("MOUs") to describe the roles and responsibilities of each department within the partnership.

Additionally, the California Code, Welfare and Institutions Code - WIC § 18926.7 states that "a county may contract with an employment social enterprise or designated intermediary to provide services to its CalFresh E&T program participants." This language was added to the code as a result of California Assembly Bill AB 415, enacted September 28, 2017, with the aim to increase partnerships between CFET counties and social enterprises.

After considering pilot results, WDACS plans to work with DPSS to expand CFET services to additional community-based organizations and AJCCs across the County.

MONITORING REQUIREMENT

Administrative, programmatic, and fiscal monitoring of all CEPP Subrecipients will be conducted on an annual basis to ensure Subaward compliance.

IMPACT ON CURRENT SERVICES

Approval of the recommended actions will allow for increased efficiencies in meeting the Board's mandates and provide employment and training services to the hardest to place populations of Los Angeles County, our CalFresh recipients. The federal government requires CalFresh recipients who are Able-Bodied Adults Without Dependents ("ABAWDs") to work or participate in a work or training program for 20 or more hours a week as a condition for receiving CalFresh benefits beyond three months. The ABAWD requirement is currently waived in LA County. However, once the waiver expires, ABAWDs in Los Angeles County will be subject to the work requirement, and the CFET program is one way for ABAWDs to meet that requirement.

The recommended actions will not infringe on the role of the County relationship to its residents, and the County's ability to respond to emergencies will not be impaired. There is no change to risk exposure to the County.

CONCLUSION

Should you have questions, please contact me directly, or your staff may contact Mr. Kevin Anderson, Special Assistant, at (213) 738-2593 or kanderson@wdacs.lacounty.gov.

Respectfully submitted,

OTTO SOLÓRZANO
Acting Director

Enclosure

c: Executive Office, Board of Supervisors
Chief Executive Office
County Counsel
Department of Public Social Services